

APPENDIX **A**

**Notice of Preparation, Initial Study, and  
Scoping Report**



# SAN FRANCISCO PLANNING DEPARTMENT

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## Notice of Preparation of an Environmental Impact Report

*Date:* April 22, 2009  
*Case No.:* 2005.1912E  
*Project Title:* Natural Areas Management Plan  
*Project Size:* 1,105 acres  
*Project Sponsor:* Daniel LaForte, San Francisco Recreation and Park Department  
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*Lead Agency:* San Francisco Planning Department  
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### PROJECT DESCRIPTION

Fragments of unique plant and animal habitats within San Francisco and Pacifica, known as Significant Natural Resource Areas (Natural Areas), have been preserved within parks that are managed by the San Francisco Recreation and Park Department (SFRPD). In the late 1990s, the SFRPD developed a Natural Areas Program to protect and manage these Natural Areas for the natural and human values they provide. The Natural Areas Program mission is to preserve, restore, and enhance the remnant Natural Areas and to promote environmental stewardship of these areas. On January 19, 1995, the San Francisco Recreation and Park Commission approved the first Significant Natural Resource Areas Management Plan (SNRAMP).

Over the course of several years, the SFRPD developed a new SNRAMP, with the final draft plan published in February 2006 and based on the 1995 plan. This SNRAMP contains detailed information on the biology, geology, and trails within 31 Natural Areas, 30 of which are in San Francisco and one (Sharp Park) is in Pacifica. The SNRAMP is intended to guide natural resource protection, habitat restoration, trail and access improvements, other capital projects, and maintenance activities over the next 20 years.

A detailed project description can be found in the Initial Study attached to this Notice of Preparation.

### FINDING

**This project may have a significant effect on the environment and an Environmental Impact Report is required.** This determination is based upon the criteria of the State CEQA Guidelines, Sections 15063 (Initial Study), 15064 (Determining Significant Effect), and 15065 (Mandatory Findings of Significance), and for the reasons documented in the Environmental Evaluation (Initial Study) for the project, which is attached.

### PUBLIC SCOPING PROCESS

Pursuant to the State of California Public Resources Code Section 21083.9 and California Environmental Quality Act Guidelines Section 15206, two public scoping meeting will be held to receive oral comments concerning the scope of the EIR. These meetings will be held on **Tuesday, May 12, from 6:30 pm to 9:30 pm** at **County Fair Building Auditorium in Golden Gate Park (9th Avenue and Lincoln Way)** and

Thursday, May 14, from 6:30 pm to 9:30 pm at Pedro Point Firehouse in Pacifica (1227 Danmann Avenue). Written comments will also be accepted at this meeting and until the close of business on May 26, 2009. Written comments should be sent to Bill Wycko, San Francisco Planning Department, Natural Areas Management Plan, 1650 Mission Street, Suite 400, San Francisco, CA 94103.

If you work for a responsible State agency, we need to know the views of your agency regarding the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR when considering a permit or other approval for this project. Please include the name of a contact person in your agency.

April 20, 2009  
Date

  
Bill Wycko  
Environmental Review Officer

# **INITIAL STUDY**

Case No. 2005.0912E

## **SIGNIFICANT NATURAL RESOURCE AREAS MANAGEMENT PLAN**

April 2009



By:  
San Francisco Planning Department  
San Francisco, California

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## ACRONYMS AND ABBREVIATIONS

BA	Balboa
BAAQMD	Bay Area Air Quality Management District
BG	Billy Goat Hill
BH	Bernal Hill
BMP	best management practice
BP	Brooks Park and Lakeview/Ashton Mini Park
BV	Buena Vista Park
C-APE	CEQA area of potential effects
CARB	California Air Resources Board
CCSF	City and County of San Francisco
CDFG	California Department of Fish and Game
CDMG	California Division of Mines and Geology
CEQA	California Environmental Quality Act
CH	Corona Heights
CNPS	California Native Plant Society
CRHR	California Register of Historical Resources
CRLF	California red-legged frog
DC	Duncan-Castro
DP	Dorothy Erskine
DPA	Dog Play Area
EIR	Environmental Impact Report
EM	Edgehill Mountain
EPA	US Environmental Protection Agency
ERO	Environmental Review Officer
FARR	Final Archaeological Resources Report
FEMA	Federal Emergency Management Agency
FI	15th Avenue Steps
FIRM	Flood Insurance Rate Map
FP	Fairmount Park

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## ACRONYMS AND ABBREVIATIONS

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GC/OH	Glen Canyon Park and O'Shaughnessy Hollow
GGNRA	Golden Gate National Recreation Area
GGRH	Golden Gate Heights Park, Grandview Park, Hawk Hill, and Rock Outcrop
GHG	greenhouse gas
GIS	Geographic Information System
GR	General Recommendations
IB	India Basin Shoreline Park
IG	Interior Greenbelt
IPM	Integrated Pest Management
KH	Kite Hill
LM	Lake Merced
LS	locally sensitive
MA	management area
MD	Mount Davidson
MEA	Major Environmental Analysis
MLD	Most Likely Descendant
MP	McLaren Park
MRZ	Mineral Resource Zone
NAHC	Native American Heritage Commission
Natural Areas	Significant Natural Resource Areas
NFIP	National Flood Insurance Program
NPS	National Park Service
NWIC	Northwest Information Center
OSHA	Occupational Safety and Health Administration
OW	Golden Gate Park Oak Woodlands
PL	Pine Lake
PM <sub>10</sub>	inhalable particulate matter
PM <sub>2.5</sub>	fine particulate matter
PP	Palou-Phelps
SFGS	San Francisco garter snake
SFHA	special flood hazard area
SFPUC	San Francisco Public Utilities Commission
SFRPD	San Francisco Recreation and Park Department
SNRAM	Significant Natural Resource Areas Management Plan
SP	Sharp Park
TK	Tank Hill
TP	Twin Peaks
TSS	total suspended solids
UCMP	University of California Museum of Paleontology
USACE	US Army Corps of Engineers
USFWS	US Fish and Wildlife Service
VP	Bayview Park

# INITIAL STUDY

## (Case No. 2005.0912E—Natural Areas Management Plan)

### A. PROJECT DESCRIPTION

#### A.1 INTRODUCTION

While San Francisco is by and large a densely developed urban area, fragments of unique plant and animal habitats within San Francisco and Pacifica, known as Significant Natural Resource Areas (Natural Areas), have been preserved within the parks that are managed by the San Francisco Recreation and Park Department (SFRPD). In the late 1990s, the SFRPD developed a Natural Areas Program to protect and manage these Natural Areas for the natural and human values they provide. The Natural Areas Program mission is to preserve, restore, and enhance the remnant Natural Areas and to promote environmental stewardship of these areas. On January 19, 1995, the San Francisco Recreation and Park Commission approved the first Significant Natural Resource Areas Management Plan.

Over the course of several years, the SFRPD developed a new Significant Natural Resource Areas Management Plan (SNRAMP, SFRPD 2006), with the final draft plan published in February 2006 and based on the 1995 plan. This SNRAMP contains detailed information on the biology, geology, and trails within 31 Natural Areas, 30 of which are in San Francisco and one (Sharp Park) is in Pacifica. The SNRAMP is intended to guide natural resource protection, habitat restoration, trail and access improvements, other capital projects, and maintenance activities over the next 20 years. The proposed project is the SFRPD's implementation of the SNRAMP.

The Major Environmental Analysis Division of the San Francisco Planning Department has prepared this Initial Study in accordance with the California Environmental Quality Act (CEQA) (California Public Resources Code, Sections 21000-21177) and the Guidelines for Implementation of the California Environmental Quality Act (California Code of Regulations, Title 14, Sections 15000-15387). It evaluates environmental impacts associated with the project, identifies feasible mitigation measures to reduce these impacts to a less than significant level, and includes improvement measures to further reduce impacts identified as less than significant.

This Initial Study provides a preliminary evaluation of the proposed project. Potentially significant environmental impacts of the proposed project will be addressed in detail in an Environmental Impact Report to be prepared for this project.

#### A.2 PROJECT OBJECTIVES AND GOALS

The objectives of the SNRAMP are as follows:

- To present the inventory of biological resources in Natural Areas, which will inform planning, restoration, and management activities;

- To develop a geographic information system database containing baseline information for each of the Natural Areas;
- To identify issues and impacts adversely affecting ecosystem functions and biological diversity;
- To identify and prioritize restoration and management actions designed to promote the functioning of San Francisco’s native ecosystem, including the maintenance of native biodiversity;
- To identify and prioritize monitoring activities of natural resources to support an adaptive management<sup>1</sup> approach;
- To provide guidelines for passive recreational<sup>2</sup> uses compatible with the San Francisco’s natural resources; and
- To provide guidelines for educational, research, and stewardship programs.

Summarized below are the goals of the SNRAMP.

**Conservation and Restoration Goals**

- To identify existing natural resources;
- To maintain viable populations of all special status species;<sup>3</sup>
- To maintain and enhance native plant and animal communities;
- To maintain and enhance local biodiversity;
- To reestablish native community diversity, structure, and ecosystem function where degraded;
- To improve natural area connectivity; and
- To decrease the extent of invasive exotic species cover.

**Education Goals**

- To provide services that will enable all age groups to better understand the values of the Natural Areas, including ecosystem functions and socioeconomic values;
- To provide opportunities for service learning to students in the San Francisco Unified School District; and

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<sup>1</sup>Adaptive management—a flexible, learning-based approach to managing complex ecosystems.

<sup>2</sup>Passive recreation—recreational activities that occur in a natural setting and that require minimal site development or facilities. Under passive recreation, the importance of the environment or setting for the activities is greater than in developed or active recreation settings.

<sup>3</sup>Special status species—species that are accorded special status because of their recognized rarity or vulnerability to habitat loss or population decline. Some of these species receive specific protection in federal or state endangered species legislation. Others have been designated sensitive species or species of special concern on the basis of adopted policies of federal, state, or local resource agencies. These species are referred to collectively as special status species.

- To provide diverse outdoor classroom opportunities.

#### **Research Goals**

- To provide a research framework and research opportunities to schools and universities that will lead to an enhanced understanding of the natural systems and an informed adaptive management approach;
- To contribute to the scientific understanding of local natural systems; and
- To contribute to the field of restoration ecology and other applied sciences.

#### **Stewardship Goals**

- To develop and support opportunities for public stewardship of Natural Areas;
- To foster neighborhood stewardship and volunteer groups; and
- To provide diverse opportunities for participation by stewardship groups.

#### **Recreation Goals**

- To provide opportunities for passive recreational uses (e.g., hiking, nature observation) that are compatible with conservation and restoration goals and
- To improve and develop a recreational trail system that provides the greatest amount of accessibility while protecting natural resources.

#### **Monitoring Goals**

To establish a long-term monitoring program to:

- Identify the species on which monitoring should focus;
- Detect increases and declines in abundance, distribution, or health of special status species;
- Detect significant changes in acreage of native communities, wildlife habitats, and invasive species;
- Detect significant increases and declines in native species richness;
- Assess success of restoration activities in achieving conservation and restoration goals; and
- Provide an adaptive management framework for evaluating changes (e.g., conceptual model).

#### **Design and Aesthetic Goals**

- Where possible, to develop aesthetically pleasing landscapes that are consistent with surrounding landscapes and that create natural transitions, especially where adjacent parklands and traditionally landscaped areas abut Natural Areas;
- To maintain and develop viewpoints and viewsheds<sup>4</sup> to enhance park experiences; and

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<sup>4</sup>Viewshed—the landscape that can be directly seen under favorable atmospheric conditions, from a viewpoint or along a transportation corridor.

- Where possible, to design and maintain landscapes to discourage the accumulation of trash and illegal encampments.

#### **Safety Goal**

- To design and maintain landscapes that promote public safety.

### **A.3 PROJECT LOCATION**

The 31 Natural Areas are scattered mostly throughout the central and southern portions of San Francisco and constitute approximately four percent of the total city area; one Natural Area is in Pacifica. The areas range in size from less than one acre to almost 400 acres and include such popular locations as Twin Peaks and portions of Glen Canyon Park. Many of these areas support sensitive plant and animal species and habitats. Others include striking geologic formations. Most are used as recreational open spaces by residents and visitors. While mostly owned by the SFRPD, some remnant Natural Areas are managed by other public and private entities. Some of these properties may eventually be transferred to the SFRPD. Figure 1 is an overview map of the Natural Areas. Detailed maps of each Natural Area depicting the designated management areas described below can be found in Appendix A.

### **A.4 PROJECT OVERVIEW**

The Significant Natural Resource Areas Management Plan, Final Draft (SFRPD 2006) is incorporated by reference into this description of the project.

As envisioned, the SNRAMP will provide the framework for long-term management of the Natural Areas. One goal is to provide the resource managers with a framework that can be used for the next 20 years. During this period, restoration actions will be taken within the framework of an evolving urban fabric, and monitoring will determine the success of those actions and influence future actions.

The management areas (MAs) addressed in the SNRAMP represent differing levels of sensitivity, species presence, and habitat complexity within the 31 Natural Areas. Three levels of MAs have been defined as MA-1, MA-2 and MA-3, and the acreage of each Natural Area is divided among these three categories. MA-1, MA-2, and MA-3 areas make up approximately 18, 39, and 43 percent of the total Natural Areas, respectively. In general, MA-1 represents the priority areas for conservation and management activities, where management actions provide the greatest conservation benefit. As additional resources become available, management activities may shift to MA-2 or MA-3 areas. Individual maps of the Natural Areas showing the designated management areas are included in Appendix A.

Portions of Natural Areas designated MA-1 are those that:

- Support listed species or special status species;
- Support habitat for a significant number of sensitive species of plants or animals;
- Contain a relatively high portion of native plants or plant richness;



- Contain unique remnant native vegetation (such as native grasslands or wetlands<sup>5</sup>);
- Contain habitats or species most likely to be impacted by human use;
- May support vegetation assemblages of limited distribution (locally or regionally); or
- Contain erosion-prone areas.

Management actions within areas designated MA-1 may include:

- The most focused restoration work, possibly to the degree of manipulating individual plants and vegetation series;
- Reintroduction of sensitive species;
- Tree removal in conformance with forestry statements;
- Implementation of erosion-control measures as problems arise, including the closure of informal and social trails;<sup>6</sup> and
- Prohibition of planting nonnative species.

Areas designated MA-2 areas are comparatively more resilient to human disturbance than MA-1 areas, and their criteria for designation include:

- Important habitats, such as coastal scrub, wetlands, native grasslands;
- Remnant native vegetation of otherwise widespread plant communities, such as coyote brush, scrub, blackberry scrub;
- Habitats or species moderately susceptible to human impact;
- Habitat for local native wildlife species, such as resident and migratory bird species;
- Native vegetation with some nonnative elements; or
- Buffer areas for MA-1s.

Management actions within areas designated as MA-2 may include the following:

- Management focused on maintaining native plant communities;
- Reintroduction of sensitive plants;

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<sup>5</sup>Wetland—a zone periodically or continuously submerged or having high soil moisture, which has aquatic or riparian vegetation components and is maintained by water supplies significantly in excess of those otherwise available through local precipitation.

<sup>6</sup>Social trail—an undesignated user-developed pathway through a Natural Area.

- Tree removal that is limited to a prescribed number of acres or trees in compliance with forestry statements;
- Implementation of erosion control measures as problems arise, including closing informal and social trails; and
- Prohibition on planting nonnative species.

The remaining lands within the Natural Areas are those designated as MA-3, which are the least sensitive. Specific criteria for areas to be designated MA-3 include:

- Absence (current or historic) of sensitive plants or animals but where there are some native plants and habitat for wildlife species;
- Predominance of nonnative vegetation that serves as a buffer for MA-1 and MA-2 from surrounding developed recreational and other land uses; or
- Unusual geological features.

Management actions within areas designated as MA-3 include:

- Activities to promote the health and diversity of urban forests<sup>7</sup> and the wildlife habitat they provide;
- Prohibition on (re)introduction of sensitive species;
- Few restrictions on recreational use (subject to the standard park rules and codes); and
- Implementation of erosion control measures as problems arise, including the closure of informal and social trails.

The Natural Areas Program staff of up to ten gardeners would continue to conduct the management actions at the Natural Areas. The Natural Areas Program also uses groups of volunteers that range in size from 10 to 50 people. The Natural Areas Program staff is composed of biologists and natural resource managers.

For larger projects, the Natural Areas Program staff would hire a contractor and would oversee the contractor's work. The Natural Areas Program staff would require a work plan addressing erosion control, species awareness and management, and other environmental considerations.

Implementation of the SNRAMP would prioritize activities at MA-1 areas, then MA-2 areas, then MA-3 areas.

Generally, 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. For

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<sup>7</sup>Urban forest—a significant stand of nonindigenous trees.

Sharp Park in Pacifica, many of the trees would be replaced not with trees but with more appropriate native vegetation; the SFRPD would coordinate with the California Department of Fish and Game to determine the appropriate types of replacement vegetation. Tree removal is discussed in detail in Appendix F of the SNRAMP. For accounting purposes, the SNRAMP defines a tree as any plant having a dominant vertical trunk that is over 15 feet tall; tree species less than 15 feet tall are considered seedlings or saplings in the SNRAMP. Natural Areas Program staff would remove any tree that has a diameter at breast height<sup>8</sup> (dbh) of six inches or less; Natural Areas Program staff would coordinate with the SFRPD arborist, who would evaluate the removal of larger trees. Tree work would generally be limited to the nonbreeding season for bird species. Where tree work is required during the breeding season, trees would be disturbed initially before breeding to discourage nesting; alternately, surveys would be conducted before tree removal to determine the presence of breeding birds. Typically, trees would be removed limb-by-limb, rather than felling an entire tree. Tree removal would leave the tree stump and root ball intact; stumps would be ground to below grade where necessary to avoid tripping hazards. The SFRPD's tree posting policy requires that all trees over six inches dbh and designated for removal be posted at least 30 days before removal. The public is invited to comment about the proposed removal, and the SFRPD may or may not modify its plans based on public input.

Implementing the SNRAMP would involve removing both individual trees and small clusters of trees that could at a maximum range from 0.25 and 0.5 acre to create openings, leaving the surrounding forest intact. Vegetation removal in MA-1 areas would be focused on individual plants within roughly half-acre plots.

Trails typically would be created in previously inaccessible areas, as opposed to improving social trails. For tree removal and other activities conducted at the edges of Natural Areas, sidewalks and roads may have to be closed temporarily.

Wherever possible, Natural Areas Program staff would avoid undeveloped areas that are not planned for restoration or other management actions.

#### A.4.1 Management Approach

The primary management concerns relate to restoring and enhancing the remaining natural communities that have been adversely impacted by human activities. Human-generated impacts on natural areas include loss of native habitat, fragmentation of the natural landscape, introduction of nonnative plants and animals, and increased pressures from human use.

Specific management issues include:

- Loss of special status or unusual native species or habitats;

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<sup>8</sup>Diameter at breast height—a standard means of tree measurement, with the diameter of the trunk measured at breast height, defined as 4.5 feet above the forest floor on the uphill side of the tree.

- Loss of diversity and components of a healthy ecosystem;
- Effect of nonnative invasive species on the local native flora and fauna;
- Erosion of natural areas from inappropriately located or constructed trails and access roads;
- Effect of human uses (recreation, poor trail location or too many trails, and a general increase in use) that conflict with conservation values; and
- Effects of feral animals and domestic pets on native flora and fauna.

Toward achieving the plan's goals, the restoration methods and practices below would be used.

### **Adaptive Management**

The strategy for managing Natural Areas is based on adaptive management, which is a flexible learning-based approach to managing complex ecosystems. Adaptive management recognizes that some uncertainty exists about the nature of ecosystems and the organisms and processes that define them. Adaptive management, as applied to natural systems, involves a continuous cycle of systematically monitoring biodiversity and other ecosystem goals, and reassessing the plans, strategies and goals, methods, and questions that underlie the management approach. Land managers then use this information to evaluate successes and failures of management actions and to refine techniques and approaches. In this approach, adaptive management is executed in three phases. First, site-specific issues and recommendations are developed. Second, a plan based on these recommendations and on priorities assigned by the Natural Areas Program is implemented. Third, a monitoring program is implemented to evaluate the plan's site-specific success and, based on the information gathered, the implementation strategies, priorities, and methods are modified, as necessary.

### **A.4.2 Integrated Pest Management**

Integrated Pest Management (IPM) is the use of multiple treatment methods to control undesirable weeds and other pests. While IPM has a range of meanings and is subject to various interpretations, the Natural Areas Program defines it as the optimal integration of management methods to control pests with the least possible hazard to people, property, and the environment. The Natural Areas Program uses a least toxic decision making model in its vegetation management. Although the IPM process has been formally adopted by many public and private organizations, it continues to evolve as management strategies are fine-tuned and innovative new pest control methods are found to be effective.

IPM is a multistep ecologically based approach that enables staff to make decisions about where, when, and how resources should be best allocated to control pests. Conventional pest control methods attempt to control the symptoms of a pest problem, but IPM is a proactive strategy that focuses on identifying and reducing, or eliminating, the root cause of a pest problem. IPM implements effective, long-term management solutions through

the use of a broad range of expertise, a combination of treatment methods, and comprehensive monitoring and evaluation.

In accordance with Chapter 39 of the San Francisco Administrative Code, the Natural Areas Program employs IPM as its strategy for preventing new and managing existing pest infestations. The Natural Areas IPM program has:

- Identified management goals, such as preserving biodiversity;
- Identified pests and the environmental conditions that favor their spread;
- Identified gaps in the knowledge of species biology and habitats and made efforts to increase understanding and fill these gaps;
- Established a monitoring program to determine pest population, size, occurrence, and rate of change in each ecosystem;
- Set injury levels and treatment thresholds;
- Employed effective, least-toxic pest control methods if feasible, using combinations of methods as necessary; and
- Implemented pilot programs to experiment with alternative pest control methods.

#### A.4.3 General Recommendations (GR)

This section presents management recommendations common throughout the various Natural Areas. For use while reading this Initial Study, a fold-out list of the general recommendations is included at the end of this document. Site-specific recommendations are presented in Section A.5.

##### **Invasive Plant Control and Revegetation**

- GR-1a—reduce invasive plant populations;
- GR-1b—where native plant seed banks do not exist or have diminished, appropriate native species may be used for revegetation. Plant native species to approximate the diversity, cover, and density of adjacent habitats or of reference sites in similar habitats;
- GR-1c—conduct restoration during the appropriate time of the year and at an appropriate scale to avoid impacts on wildlife and to minimize erosion;
- GR-1d—in areas where it may not be feasible to reduce large infestations of invasive vegetation immediately, conduct containment actions along the interface between native and nonnative habitats;
- GR-1e—annually monitor MAs, restoration areas, and other sensitive habitats for undesired plant species.

##### **Sensitive Plant Species**

- GR-2a—prioritize invasive weed reduction and management in areas supporting sensitive species or other vegetation series;

- GR-2b—give sensitive species priority in revegetation and reintroduction activities throughout Natural Areas;
- GR-2c—protect areas of sensitive species and vegetation series of limited distribution from human disturbance;
- GR-2d—closely monitor plant populations and vegetation series of limited distribution;
- GR-2e—continue to work with the scientific community to better understand key biological factors affecting the survival and reproduction of sensitive species and to better inform adaptive management decision making.

#### **Native Grasslands**

- GR-3a—monitor annually, if feasible, native grasslands and control invasive species;
- GR-3b—explore alternative methods of grassland management for large grassland expanses, such as prescribed burning, livestock grazing, and use of motorized equipment.

(Note: The SNRAMP no longer is proposing prescribed burning would not occur. The SNRAMP will be updated to reflect this change. Should the SFRPD determine prescribed burning to be a desirable, feasible method for managing native grasslands, a separate environmental review would be required to comply with CEQA, and applicable permits and other regulatory agency approvals would be obtained.)

#### **Breeding Bird Habitat**

- GR-4a—conduct annual breeding bird surveys, if resources are available, using the standard point count or transect method, to develop a list of species nesting in Natural Areas;
- GR-4b—conduct vegetation management activities outside the breeding season (April 1 to September 1) if breeding birds could be affected, unless the following specific conditions are met: projects begun before the breeding season have already disturbed the area, or a breeding bird survey is conducted first. If active nests (or large abandoned stick nests) of a sensitive species are discovered, a 150-foot-radius avoidance buffer would be centered on the nest site(s) to prevent the nesting birds from being disturbed by power tools. Weeds may be pulled by hand no closer than 50 feet from the nest;
- GR-4c—if surveys indicate that parasitism by brown-headed cowbirds is a significant problem, consult with the California Department of Fish and Game and the US Fish and Wildlife Service to determine proper protocols to minimize the negative effects of this species on breeding birds;

- GR-4d—use material from brush and tree trimming to increase nesting or escape habitat<sup>9</sup> for ground-dwelling birds and to mitigate any loss of habitat from other vegetation clearing;
- GR-4e—create corridors of shrubs between landscaped areas and Natural Areas to provide cover and transitional habitat for birds and other wildlife.

#### **Avian Foraging Habitat**

- GR-5a—prevent invasive shrubs and trees from colonizing grasslands.

#### **Avian Cavity Nesting Habitat**

- GR-6a—leave snags and dead branches on live trees, unless they are a hazard to public safety or contain significant harmful insect or disease infestations;
- GR-6b—provide nest boxes where natural cavities are absent or in limited supply;
- GR-6c—provide nest boxes for wood ducks at Impound Lake (a sub-lake of Lake Merced), Sharp Park, and Pine Lake.

#### **Predators**

- GR-7a—implement the feral cat control policy from the Quail Recovery Plan approved by the San Francisco Commission on the Environment;
- GR-7b—develop outreach materials to educate neighbors and users of Natural Areas about feral cats;
- GR-7c—undertake control of non-cat predators only where they are concentrated in such a manner that they are having a substantial effect on native wildlife populations.

#### **Dog Use**

- GR-8a—retain the boundaries and locations of eight Dog Play Areas (DPAs) in Natural Areas (Corona Heights, Pine Lake Park, Golden Gate Park Southeast, McLaren Park Crocker Amazon, McLaren Park Geneva, Golden Gate Park Northeast, Buena Vista Park, and Lake Merced) and modify two DPAs (Shelley Drive Loop at McLaren Park and Bernal Hill) to protect sensitive habitat areas;
- GR-8b—match on-leash and off-leash dog use with the sensitivity of the habitat when considering new DPAs within or next to Natural Areas;

(Note: An underlying assumption of this Initial Study is that there would be no new DPAs because there is a moratorium on them until system-wide DPA planning is completed. This moratorium was announced at the October 10, 2006, meeting of the San Francisco Dog Advisory Committee. Should new DPAs be proposed at some point, the appropriate level of CEQA analysis would be undertaken, and applicable permits and other regulatory agency approvals would be obtained.)

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<sup>9</sup>Escape habitat—natural or man-made features that allow animals to avoid predators or other threats.

- GR-8c—restrict dogs from three sensitive habitat areas (a portion of Gray Fox Creek at McLaren Park, habitat used by the San Francisco garter snake or California red-legged frog at Sharp Park, and the water at Pine Lake).

#### **Small Mammal Habitat**

- GR-9a—preserve during vegetation management activities any brush, logs, rocks, and other natural elements that function as habitat for small mammals and place them at appropriate locations within the Natural Areas.

#### **Invertebrate Habitat**

- GR-10a—as invasive plants are removed, install native plants or seeds that are beneficial to local insects;
- GR-10b—in MA-3 grasslands, maintain some invasive plant species that are host plants for local butterflies and other native insects.

#### **Trails and Views**

- GR-11a—maintain and improve primary designated trails;
- GR-11b—encourage users to stay on the trails in all Natural Areas;
- GR-11c—routinely monitor Natural Areas for new social trails and close or reroute any trails that impact sensitive species or sensitive habitat or that contribute to erosion;
- GR-11d—maintain viewsheds to maintain and enhance public recreation;
- GR-11e—consider adding amenities, such as overlooks and seating areas, when evaluating overall trail use.

#### **Erosion Control**

- GR-12a—revegetate steep slopes that have very thin vegetation to promote general soil stability;
- GR-12b—reduce erosion risk during the transition between removing invasive species and growth of native species that replace them, including gradual implementation of restoration efforts.

#### **Safety**

- GR-13a—discourage establishment of vegetation with high fire hazard ratings, such as French broom and eucalyptus stands, next to homes and other structures;
- GR-13b—maintain clear passageways by removing encroaching vegetation and maintaining sight lines to increase safety on trails.

#### **Education**

- GR-14a—continue to network with local schools and research institutions to provide environmental education resources and opportunities for school children in San Francisco and Pacifica;
- GR-14b—develop appropriate signage that explains the importance of natural resources, ecosystem functions, management activities and goals, and public involvement contacts;

- GR-14c—develop education materials that discuss the impacts of feeding wildlife and wild animals and the problems with releasing unwanted pets into Natural Areas;
- GR-14d—conduct special outreach to adjacent property owners about the impacts mentioned in GR-14c.

#### **Urban Forests**

- GR-15a—maintain urban forests within the MA-3 areas with a basal area<sup>10</sup> per acre of between 200 and 600 square feet;
- GR-15b—maintain a stocking rate that will perpetuate the urban forest and promote forest health;
- GR-15c—to promote forest health, focus tree removal on dead or dying trees, trees with disease or insect infestations, storm-damaged or hazardous trees, and trees that are suppressed because of overcrowding;
- GR-15d—do not plant sensitive species in MA-3 urban forests;
- GR-15e—remove invasive Cape, English, and Algerian ivy and Himalayan blackberry to promote and maintain urban forest health in MA-3 areas;
- GR-15f—consult the SFRPD arborist when tree removals or plantings are proposed in MA-3 urban forests;
- GR-15g—plant trees and shrubs in the urban forests that promote species diversity and improve wildlife habitat; and
- GR-15h—use San Francisco-approved insecticides to treat cut stumps.

#### **A.4.4 Best Management Practices**

The SNRAMP identifies best management practices (BMPs) for erosion control, pathogen<sup>11</sup> control, and West Nile virus.

#### **Erosion Control**

The erosion control BMPs applicable and appropriate to managing the Natural Areas include the following:

- Straw mulch—this method can be applied quickly in areas where long-term erosion protection is not required;
- Rolled erosion control products—these materials are supplied in rolls and are used to protect exposed soil areas from water and wind erosion;
- Wood mulch—this material is typically broadcast by hand onto exposed soil to prevent wind and water erosion;

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<sup>10</sup>Basal area—a measure, typically in square feet per acre, of the area covered by trees within a given urban forest. Basal area is used as an index of tree production.

<sup>11</sup>Pathogen—a disease-causing agent, especially a living microorganism such as a bacterium or fungus.

- Silt fences—this method involves staking a permeable geotextile fabric along the contours of a slope. The bottom of the silt fence is typically trenched into the soil, allowing the fence to intercept and reduce the velocity of sediment-laden sheet flow;
- Fiber rolls—these roll materials are shaped into tubes that can be placed along the contour of a slope to intercept sediment-laden sheet flow and can also be placed around storm drain inlets; and
- Straw bales—these can be applied in much the same way as the fiber rolls, but they are taller and sturdier.

### **Pathogen Control**

The SNRAMP identified the following BMPs to control the spread of pathogens from one area to another. For work conducted in a known site of sudden oak death infestation, tools should be cleaned and disinfected after use on infected trees and should be sanitized before use on healthy trees. Generally, to prevent the spread of aquatic pathogens, dirt and debris should be removed from equipment, and the equipment should be disinfected.

### **West Nile Virus**

To control the spread of this mosquito-borne disease, the following BMPs are recommended:

- Educate staff about the most effective ways to avoid being bitten by mosquitoes;
- Remove small water features that contain standing water or treat those features with BT (*Bacillus thuringiensis israelensis*), a biological control agent for mosquito larvae, if the features are to remain and Public Health Services identifies a potential health hazard; and
- Encourage staff to drain any standing water that is caused by stored equipment or by temporary depressions.

#### **A.4.5 Monitoring Plan**

Monitoring activities will be designed within the conceptual framework to address the following questions:

- What is the population status of selected special status species? Where are these populations located? What are the growth trends for each of these populations and for the species as a whole within the Natural Areas?
- How successful are restoration and enhancement projects in terms of project goals? What are the best ways to measure success criteria? How do selected management activities, including restoration and conservation projects, affect the diversity and abundance of native species in relation to the diversity and abundance of invasive species within the project areas?

The following standardized protocols have been developed to address those questions:

### **Monitoring Populations of Special Status Species**

- Monitoring special status plant species
  - Locate populations,
  - Map populations,
  - Estimate population/cover, and
  - Assess population/cover change.
- Monitoring Special Status Wildlife Species
  - Locate populations and
  - Assess population change.

### **Measuring the Success of Restoration and Conservation Programs**

- Qualitative methods for assessing project success
  - Timing of photo-monitoring and
  - Location of photo-monitoring.
- Quantitative Methods for Assessing Project Success
  - Map project area,
  - Randomize samples,
  - Conduct point intercept sampling, and
  - Record and analyze.
- Tracking changes in avian and butterfly diversity and abundance
  - Qualitative methods for avian species monitoring,
  - Quantitative methods for avian species monitoring,
  - Qualitative methods for monitoring butterfly species, and
  - Quantitative methods for monitoring butterfly species.

A monitoring program can be successful only if it is applied uniformly and consistently. Once a monitoring effort has begun, the methods for collecting data must continue in the manner that they were initially implemented, or the data will not be comparable over time and between sites. The protocols associated with this monitoring plan should not be altered in any significant way.

#### **A.5 NATURAL AREAS**

The Significant Natural Resource Areas Management Plan, Final Draft (SFRPD 2006) is incorporated by reference into this description of the proposed project. The information presented below for each of the Natural Areas is grouped into sections on general description, management areas, and recommended management actions. The system-wide recommendations that apply to the entire Natural Area are presented first, followed by site-specific recommendations, including an alphabetical code unique to each Natural

Area. As presented in the SNRAMP, a number of the Natural Areas have been grouped in this section; as a result, the 31 Natural Areas are addressed in 26 subsections below. Table 1 is an overview of the management activities proposed for each of the Natural Areas. Figure 1 is an overview of the Natural Areas, and individual maps of the Natural Areas are included in Appendix A.

#### A.5.1 Balboa (BA)

##### **General Description**

The 1.8-acre Balboa Natural Area, also referred to as Parcel 4, is at the corner of Balboa Street and the Great Highway in western San Francisco. The National Park Service (NPS) maintains the Balboa Natural Area for the City and County of San Francisco (CCSF) under the terms of a Cooperative Management Agreement approved in 2007. It is in the southern corner of the Sutro Heights Park and is across the Great Highway from Ocean Beach and the Pacific Ocean. This all-sand area has one of the few foredune communities in San Francisco. An elevated boardwalk provides public access and keeps people out of the sensitive sand dune vegetation. The SFRPD and the NPS jointly administer the Balboa Natural Area for the CCSF. This Natural Area is public land that the CCSF has dedicated for recreation and sewer system operations. It is next to NPS lands administered by the Golden Gate National Recreation Area (GGNRA).

##### **Management Areas**

The 1.1-acre MA-1 area of the Balboa Natural Area includes restored dune scrub habitat and sensitive species. The 0.7-acre MA-2 area is a sandy substrate area with potential for expansion of the dune community. There is no MA-3 area at the Balboa Natural Area.

##### **Recommended Management Actions**

At Balboa, GR-1, GR-2, GR-4, GR-7, GR-9, and GR-11 through GR-14 would be implemented to address management issues. In addition, the following site-specific management actions are recommended for the Balboa Natural Area:

- BA-1a—contain and reduce herbaceous<sup>12</sup> invasive plants and prevent invasive tree species from becoming established;
- BA-1b—revegetate using appropriate native plants in those areas where invasive plants have been removed;
- BA-1c—augment existing populations of sensitive plant species; and
- BA-1d—reintroduce rare plants.

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<sup>12</sup>Herbaceous—having the texture, color, and other characteristics of an ordinary foliage leaf. Herbaceous vegetation is not woody. having the texture, color, and other characteristics of an ordinary foliage leaf. Herbaceous vegetation is not woody.

**Table 1  
Summary of Natural Areas Management Plan**

Natural Area Site	Park Acreage	Natural Area Acreage <sup>*</sup>	Management Area (acres)				Invasive Trees			Trails (feet)				Dog Play Areas (acres)			
			MA-1	MA-2	MA-3	Total MA <sup>1</sup>	Existing	To Remove	To Remain	Existing	To Close/ Relocate	To Create	Resulting	Existing	To Remove	To Remain	Monitor <sup>**</sup>
Balboa Natural Area	1.8	1.8	1.1	0.7	0	1.8	0	0	0	637	90	0	547				
Bayview Park	43.9	43.9	8.2	15.8	19.7	43.7	6,000	511	5,489	8,496	1,439	1,020	8,077				
Bernal Hill	24.3	24.3	7.6	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	0.6	1.1	1.6	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	4,856	0.4	0	0.4	No
Dorothy Erskine Park	1.5	1.5	0.2	0.3	1.0	1.5	120	14	106	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				
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 <sup>***</sup>	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	0.8	30	0	30	559	390	188	357				
Golden Gate Park Oak Woodlands	1,021.0	26.2	0.7	25.5	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	409	0	1,313				
Hawk Hill	4.5	4.5	1.4	3.0	0	4.4	10	0	10	1,609	692	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	1.8	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	1,957	398	0	1,559				
Lake Merced	614.0	395.0	60.8	101.8	231.5	394.1	12,000	134	11,866	11,106	3,319	365	8,152	5.0	5.0	0	Yes
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	68.3	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	496	1,018				
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	2.9	2.9	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				
15th Avenue Steps	0.3	0.3	0	0.2	0	0.2	0	0	0	0	0	0	0				
<b>San Francisco Subtotal</b>	<b>2,311.7</b>	<b>868.3</b>	<b>158.1</b>	<b>305.0</b>	<b>401.3</b>	<b>864.4</b>	<b>63,453</b>	<b>3,448</b>	<b>60,005</b>	<b>196,562</b>	<b>53,758</b>	<b>4,105</b>	<b>146,909</b>	<b>95.2</b>	<b>19.3</b>	<b>75.9</b>	
Sharp Park (Pacifica)	411.0	237.2	35.0	125.1	76.5	236.6	54,000	15,000	39,000	14,741	653	1,792	15,880				
<b>Total</b>	<b>2,722.7</b>	<b>1,105.5</b>	<b>193.1</b>	<b>430.1</b>	<b>477.8</b>	<b>1,101.0</b>	<b>117,453</b>	<b>18,448</b>	<b>99,005</b>	<b>211,303</b>	<b>54,411</b>	<b>5,897</b>	<b>162,789</b>	<b>95.2</b>	<b>19.3</b>	<b>75.9</b>	

<sup>\*</sup>The total acreages for the management areas do not exactly match the Natural Areas acreages. The Natural Areas acreages are based on vegetation series within each Natural Area where the geographic information system data was precisely clipped to the Natural Area boundary. Management areas were created by mapping their boundaries in the field with a GPS unit. This data was then edited by Natural Areas Program staff to match Natural Areas boundaries. This process created minor errors when the management area appeared to line up with the Natural Area boundary but in fact was off by a small amount. The average error is about 0.1 acre and never more than 0.8 acre. As would be expected, the error is largest in the larger Natural Areas because they have relatively longer boundaries.

<sup>\*\*</sup>The SFRPD would monitor dog use and impacts on oak woodlands at Buena Vista and Golden Gate Park Oak Woodlands and impacts on small wildflower meadows in McLaren Park. Until the Dog Play Area at Lake Merced is removed, the SFRPD would monitor that area for impacts.

<sup>\*\*\*</sup>Glen Canyon Park and O'Shaughnessy Hollow are two different Natural Areas; they are grouped together in this table, as they are in the SNRAMP.

## A.5.2 Bayview Park (VP)

### **General Description**

Bayview Park is in southeast San Francisco and is east of Candlestick Point State Park and Candlestick Park. Developed areas within the 43.9-acre Natural Area are limited to paved trails, which are also used as access roads. This is one of the more diverse Natural Areas with vegetation that includes grasslands, scrub, tree-dominated areas, and a large number of sensitive plant species. The vegetation provides suitable habitat for resident and migratory bird species, reptiles, mammals, and amphibians. The extensive grasslands provide habitat for butterflies and other insects, including the endangered mission blue butterfly (*Icaricia icarioides missionensis*). It also contains historic Works Progress Administration features.

### **Management Areas**

The 8.2-acre MA-1 area is native grassland and scrub habitats that support the highest numbers of sensitive species. The 15.8-acre MA-2 area also may contain sensitive species and habitats and may act as buffers for the more sensitive areas. The 19.7-acre MA-3 area includes urban forests and invasive scrub.

### **Recommended Management Actions**

At Bayview Park, GR-1 through GR-4, GR-6, GR-7, and GR-9 through GR-15 would be implemented to address management issues. In addition, the following site-specific management actions are recommended:

- VP-1a—reduce and contain herbaceous and woody invasive plants;
- VP-1b—remove approximately 511 of the estimated 6,000 invasive trees (primarily blue gum eucalyptus) to enhance sensitive species habitats;
- VP-1c—protect and maintain existing native habitats;
- VP-1d—augment existing sensitive plant populations;
- VP-1e—reintroduce populations of sensitive plant species to help prevent extinctions of these species in San Francisco;
- VP-2a—install coast live oak seedlings and other native plants in gaps and openings in the eucalyptus forest;
- VP-3a—construct a small berm to create a seasonal wetland and detention basin, if capital funds are made available;
- VP-4a—maintain and improve habitat for the pinion mouse;
- VP-5a—augment existing silver bush lupine populations;
- VP-6a—install signs and temporary barriers along the roadway to discourage off-road motorcycle riding;
- VP-7a—construct a pedestrian trail connecting to the historic Works Progress Administration trail;

- VP-7b—develop a new entryway on the southern side of the park;
- VP-8a—remove the berm on the downhill side of Key Avenue and regrade the entire roadway so that the uphill side is higher than the downhill side, if funds are made available;

(Note: portions of this management action have been completed. Those that have not been undertaken will be addressed in the EIR.)

- VP-8b—remove material in major downslope gullies and replace it with brush that is highly compacted;
- VP-8c—build a small berm south of Key Avenue at the base of the main soil slip;
- VP-9a—create a detailed and complete erosion control plan before beginning work on the large gully near the summit; work would include the following:
  - Installing a minimum of two check-dams within the upper portion of the gully,
  - Creating soil berms and troughs between these two structures,
  - Removing soil from the upper edges of the gully to create a 1:1 slope,
  - Installing a staked brush pile or brush box immediately below the upper edge of the gully,
  - Installing one or two staked brush bundles in the vegetated swale leading into the gully from the direction of the radio tower,
  - Installing rice straw bales along all edges of the gully, and
  - Hand broadcasting the entire area with the appropriate native grass seed once construction is complete and before the fall rains; and
- VP-10a—restrict access to sensitive mission blue butterfly habitat if these habitat areas continue to be damaged.

### A.5.3 Bernal Hill (BH)

#### **General Description**

Bernal Hill is in the Bernal Heights neighborhood in central San Francisco. A microwave radio transmission station, not owned by the SFRPD, is in a fenced enclosure at the hill's summit. Other than a paved access road, the 24.3-acre Natural Area is primarily grassland. A designated DPA is on and above Bernal Heights Boulevard, which circumnavigates the Natural Area.

#### **Management Areas**

The 7.6-acre MA-1 area includes the slopes of Bernal Hill where native grasslands and sensitive species are found. The 5.8-acre MA-2 area serves as a buffer between the MA-1 area and urban forest. The 10.7-acre MA-3 area is that portion of the Natural Area that does not support sensitive species or native grasslands.

### **Recommended Management Actions**

At Bernal Hill, GR-1 through GR-4 and GR-7 through GR-14 would be implemented to address management issues. In addition, the following site-specific management actions are recommended for the Bernal Hill Natural Area:

- BH-1a—reduce and contain herbaceous and woody invasive plants;
- BH-1b—revegetate using appropriate native plants where invasive plants have been removed;
- BH-1c—focus sensitive plant species management and conservation on existing habitat areas;
- BH-1d—maintain the urban forest-grassland mosaic;
- BH-2a—encourage people and dogs to stay on designated trails and discourage them from climbing the steep slopes and causing erosion on the north side of the Natural Area; and
- BH-3a—retain on- and off-leash dog use of the entire Natural Area and limit off-leash activities to the relatively flat areas, reducing the off-leash DPA from 21 to 15 acres.

#### **A.5.4 Billy Goat Hill (BG)**

### **General Description**

The 3.5-acre Billy Goat Hill Natural Area is in the Diamond Heights area, east of Glen Canyon Park. The Natural Area is composed mainly of grasslands. Billy Goat Hill provides important habitat for native plants and populations of sensitive plant species, grassland habitat, and suitable habitat for a variety of bird species and special-status butterfly species.

### **Management Areas**

The MAs have been delineated based on the presence of rich native grasslands. The 0.6-acre MA-1 area supports the richest array of species, as well as more intact habitat than the 1.1-acre MA-2 area, which surrounds the MA-1 and buffers it. The MA-2 area is itself surrounded on three sides by the 1.6-acre MA-3 area, which includes tree and grassland communities.

### **Recommended Management Actions**

At Billy Goat Hill, GR-1 through GR-4, GR-7, and GR-9 through GR-14 would be implemented to address management issues. In addition, the following site-specific management actions are recommended for the Billy Goat Hill Natural Area:

- BG-1a—reduce and contain woody and herbaceous invasive plants;
- BG-1b—revegetate using appropriate native plants, enhance and diversify existing grasslands as appropriate, augment the existing rare or uncommon grassland plant species, slowly replace the nonnative grassland with a grassland

dominated by native species, maintain and enhance the native scrub community, and plant native grassland and scrub species into the appropriate areas using diversity, cover, and density targets generated from reference sites around San Francisco;

- BG-1c—maintain a periphery of tall trees and diversify areas at the grassland interface with wildlife-enhancing species, and design, maintain, and enhance a grassland-scrub-tree mosaic; and
- BG-2a—create and protect a complex mosaic of grassland and scrub with a variety of plant species that will provide shelter, food, and nesting areas for local wildlife.

#### A.5.5 Brooks Park and Lakeview/Ashton Mini Park (BP)

##### **General Description**

Brooks Park and Lakeview/Ashton Mini Park (also informally known as Orizaba Rocks) are in southwestern San Francisco in the Merced Heights and Ingleside Heights neighborhoods. Brooks Park, which fronts on Shields Street between Victoria and Vernon Streets, is a 3.5-acre park, two acres of which are part of the Natural Area. The 0.5-acre Lakeview/Ashton Mini Park Natural Area is a rocky outcrop at the dead ends of Ashton and Orizaba Avenues and Lakeview and Shields Streets. Both of these Natural Areas contain grasslands.

##### **Management Areas**

The Brooks Park and Lakeview/Ashton Mini Park Natural Areas are dominated by grasslands, and the relative quality of the grasslands define the MA-1, MA-2, and MA-3 areas. The 0.9-acre MA-1 areas encompass two grasslands at Brooks Park and one area at Lakeview/Ashton Mini Park. The 1.1-acre MA-2 areas are the grasslands surrounding the MA-1 areas and serve as buffers between the MA-1 and the MA-3 areas. The 0.5-acre MA-3 areas are on the periphery in both parks and represent the least sensitive grassland areas.

##### **Recommended Management Actions**

At Brooks Park and Lakeview/Ashton Mini Park, GR-1 through GR-4, GR-7, and GR-10 through GR-14 would be implemented to address management issues. In addition, the following site-specific management actions are recommended for the Brooks Park and Lakeview/Ashton Mini Park Natural Areas:

- BP-1a—contain and reduce herbaceous and woody invasive plants;
- BP-1b—remove three cypress trees and prevent establishment of invasive trees in all areas;
- BP-1c—revegetate with appropriate native plants using diversity, cover, and density targets generated from reference sites within and around San Francisco; and

- BP-1d—consider augmenting sensitive species at Lakeview/Ashton Mini Park and introducing sensitive species within suitable locations at Brooks Park.

#### A.5.6 Buena Vista Park (BV)

##### **General Description**

The 36.1-acre Buena Vista Park is in central San Francisco, just north of Corona Heights, and is bounded in part by Haight Street on the north; Buena Vista Avenue East and Buena Vista Avenue West loop around the park and form the eastern, southern, and western boundaries. The 6.1-acre Buena Vista Park Natural Area is on the northern side of the park and supports one of the most extensive coast live oak forests within San Francisco. The remainder of the park is covered almost exclusively by mixed exotic forest. There is a designated DPA in the northwest corner of Buena Vista Park in the oak woodland.

##### **Management Areas**

The 6.1-acre MA-2 area includes coast live oak woodlands in the northern portion of the park. There are no MA-1 or MA-3 areas.

##### **Recommended Management Actions**

At Buena Vista Park, GR-1, GR-2, GR-4, GR-6, GR-7, GR-9, GR-11, GR-13, and GR-14 would be implemented to address management issues. In addition, the following site-specific management actions are recommended for the Buena Vista Park Natural Area:

- BV-1a—reduce woody and herbaceous invasive plants and understory<sup>13</sup> plants and prevent invasive trees from becoming established;
- BV-1b—remove approximately 10 eucalyptus and acacia trees out of 140 invasive trees, revegetate areas with appropriate dune scrub and oak trees to promote creation of a multi-aged stand, and use diversity, cover, and density targets generated from reference sites around San Francisco to develop planting plans;
- BV-1c—consider reintroducing rare or uncommon plant species;
- BV-2a—create complex multistoried habitat by removing invasive species in the understory and planting species that provide food and nesting resources and increase structural diversity by planting native vegetation that is different in height at maturity than vegetation in the existing habitats;
- BV-2b—install a permanent water source within or next to the Natural Area in an area that would not be easily accessible to off-leash dogs or subject to undesirable human use and ensure that artificial water sources can be drained periodically to remove bullfrogs;
- BV-3a—augment winter and late-fall fruiting shrubs; and

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<sup>13</sup>Understory—the shrubs and plants growing beneath the main canopy of a forest or stand of trees.

- BV-4a—consider implementing protective measures or relocating the DPA outside of oak woodlands if necessary to protect nesting bird habitat.

#### A.5.7 Corona Heights (CH)

##### **General Description**

Corona Heights is in the central portion of San Francisco and is bounded roughly by Flint Street, Roosevelt Way, and 16th Street. The Corona Heights Playground and the Randall Museum are within the southern portion of the park. Of the park's 12.6 acres, the Natural Area covers approximately 9.6 acres and is composed of grasslands, with scrub and tree-dominated areas around its edges. A fenced DPA is next to the northwest portion of the Natural Area.

##### **Management Areas**

The 2.9-acre MA-1 areas include three areas with sensitive species and habitats. The 2.5-acre MA-2 areas are buffers around the MA-1 areas. The 4.2-acre MA-3 areas include urban forest and grasslands around the Natural Area perimeter.

##### **Recommended Management Actions**

At Corona Heights, GR-1 through GR-4, GR-7, GR-9 through GR-13, and GR-15 would be implemented to address management issues. In addition, the following site-specific management actions are recommended for the Corona Heights Natural Area:

- CH-1a—contain and reduce herbaceous and woody invasive plants and prevent invasive tree species from becoming established;
- CH-1b—augment existing populations of sensitive plant species through seeding or planting;
- CH-1c—reintroduce populations of rare plant species to help prevent local extinctions of these species in San Francisco;
- CH-1d—maintain diverse native grassland in areas where invasive plants have been removed. Maintain and enhance oak woodlands;
- CH-1e—remove 15 Monterey pines;
- CH-2a—create complex multistoried habitat that provides food sources and nesting, roosting, and escape habitat for a variety of species;
- CH-2b—increase the extent of oak woodland habitat to create habitat for wildlife, particularly birds; and
- CH-3a—install signs and temporary barriers at access points to discourage people and dogs from going off the trails into erosion-prone areas. If signs and temporary fencing prove ineffective, install permanent fences at the base of the hill.

#### A.5.8 Dorothy Erskine (DP)

##### **General Description**

Dorothy Erskine Park is near the southern end of Glen Canyon Park at the intersection of Baden Street and Martha Avenue in central San Francisco. The 1.5-acre Natural Area is mostly forested. Most remnant plant areas and important wildlife habitat are associated with the grassland and mixed exotic forests on the steep north-facing slopes, which are inaccessible due to the presence of a safety fence at the top of the slope. There is one main trail and access route through the Natural Area.

##### **Management Areas**

The 0.2-acre MA-1 areas contain remnant grassland and wildflower habitats. The 0.3-acre MA-2 areas include remnant scrub habitat and serve as buffers to the MA-1 areas. The 1.0-acre MA-3 areas are composed of urban forests.

##### **Recommended Management Actions**

At Dorothy Erskine, GR-1, GR-2, GR-4, GR-7, GR-9, GR-13, and GR-15 would be implemented to address management issues. In addition, the following site-specific management actions are recommended for the Dorothy Erskine Natural Area:

- DP-1a—reduce and contain herbaceous and woody invasive plants and prevent invasive trees from becoming established;
- DP-1b—remove approximately 14 of the estimated 120 eucalyptus trees;
- DP-1c—revegetate with appropriate native plants those areas where invasive plants have been removed to maintain and enhance the native grassland and scrub communities;
- DP-1d—reintroduce silk tassel bush to prevent the countywide extinction of this sensitive plant species; and
- DP-2a—survey the site for red-tailed hawk nests before tree removal. If an occupied nest is found, conduct tree removal activities no closer than 500 feet from the nest.

#### A.5.9 Duncan-Castro (DC)

##### **General Description**

Duncan-Castro is in the central portion of San Francisco and is northeast of the intersection of Castro and Duncan Streets. The 0.5-acre Natural Area is predominantly grassland, with an ornamental planting area along Duncan Street.

##### **Management Areas**

The 0.3-acre MA-1 area includes rock outcrops, red fescue prairie, and portions of the annual grassland with sensitive plant species populations. The 0.1-acre MA-2 area has less diverse grasslands and rock outcrops on the south and west sides of the Natural

Area. The 0.1-acre MA-3 area includes ornamental vegetation and forest along the eastern edge of the Natural Area.

#### **Recommended Management Actions**

At Duncan-Castro, GR-1 through GR-4, GR-7, GR-9, GR-10, GR-13, and GR-14 would be implemented to address management issues. In addition, the following site-specific management actions are recommended for the Duncan-Castro Natural Area:

- DC-1a—contain and reduce herbaceous and woody invasive plants and prevent invasive tree species from becoming established;
- DC-1b—maintain and diversify grasslands and maintain and enhance tree cover in the northeast part of the Natural Area;
- DC-1c—enhance the native scrub community; and
- DC-2a—determine whether two pipelines crossing the Natural Area are still in service or abandoned, then bury, reroute, or remove them, as appropriate.

#### **A.5.10 Edgehill Mountain (EM)**

##### **General Description**

Edgehill Mountain is northwest across Portola Drive from Mount Davidson in central San Francisco. The 2.3-acre, forested Natural Area is bordered by Kensington and Edgehill Ways. The area is accessed from Shangrila Way and Knockash Hill. Edgehill Mountain is a blue gum eucalyptus forest that supports small populations of sensitive plants and provides habitat for sensitive bird species.

##### **Management Areas**

The 0.9-acre MA-2 areas are at the center of the Natural Area and include coastal scrub and prairie grassland habitats. The 1.4-acre MA-3 areas include the remaining urban forests. There are no MA-1 areas.

##### **Recommended Management Actions**

At Edgehill Mountain, GR-1, GR-2, GR-4, GR-7, GR-9, and GR-11 through GR-15 would be implemented to address management issues. In addition, the following site-specific management actions are recommended for the Edgehill Mountain Natural Area:

- EM-1a—reduce and contain herbaceous and woody invasive plants and prevent invasive trees from becoming established;
- EM-1b—replace dead and dying trees with native species typical of coastal bluff scrub and oak woodland habitats;
- EM-1c—revegetate with appropriate native plant species in those areas where invasive plants have been removed to maintain and enhance existing scrub and grassland habitats;

- EM-1d—augment existing sensitive plants to prevent extinction of rare or uncommon plant species; and
- EM-2a—develop two new entrances and trails through the Natural Area, one entering at Kensington Way and one entering at Edgehill Way.

#### A.5.11 Fairmount Park (FP)

##### **General Description**

Fairmount Park is southeast of Billy Goat Hill in central San Francisco. The 0.7-acre Natural Area is mostly forested and is at the intersection of Fairmount and San Miguel Streets.

##### **Management Areas**

The 0.7-acre MA-3 area is an urban forest. There are no MA-1 or MA-2 areas.

##### **Recommended Management Actions**

At Fairmount Park, GR-1, GR-3, GR-4, GR-7, GR-11, GR-12, GR-13, and GR-15 would be implemented to address management issues. In addition, the following site-specific management actions are recommended for the Fairmount Park Natural Area:

- FP-1a—contain and reduce herbaceous and woody invasive plants and
- FP-1b—focus tree regeneration on the north and south sides, leaving fewer trees on the east side and helping to screen existing homes from view.

#### A.5.12 Glen Canyon Park and O’Shaughnessy Hollow (GC/OH)

##### **General Description**

Glen Canyon Park and O’Shaughnessy Hollow are south of Twin Peaks, between the Diamond Heights and Miraloma neighborhoods, in an area formally referred to as the San Miguel Hills. The approximately 70-acre Glen Canyon Park has 60 acres designated as a Natural Area. O’Shaughnessy Hollow is a 3.8-acre Natural Area. O’Shaughnessy Boulevard separates the two Natural Areas, with Glen Canyon Park to the east and O’Shaughnessy Hollow to the west. Recreation facilities in Glen Canyon Park include the Silver Tree Day Camp, a community recreation center, ball fields, playgrounds, and formal and informal trails. There are no developed areas within O’Shaughnessy Hollow.

##### **Management Areas**

The 8.1-acre MA-1 areas contain high concentrations of native plants within the grasslands or sensitive species at Glen Canyon Park. The O’Shaughnessy Hollow MA-1 areas include sensitive plant species habitat. The 33-acre MA-2 areas include the scrub-covered western slopes and the riparian<sup>14</sup> corridor in Glen Canyon Park, and areas are

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<sup>14</sup>Riparian—land next to a natural watercourse such as a river or stream. Riparian areas support vegetation that provides important wildlife habitat, as well as important fish habitat when it overhangs the bank.

designated to provide buffers around the grassland MA-1 areas. The O'Shaughnessy Hollow MA-2 areas support a mix of native-dominated scrub and grassland habitats. MA-3 areas (22.4 acres) include portions of Glen Canyon Park covered with urban forest, the invasive annual grassland in the extreme northern corner, and a corridor along the gravel access road.

### **Recommended Management Actions**

At Glen Canyon Park and O'Shaughnessy Hollow, GR-1 through GR-7, GR-8c, GR-9, and GR-11 through GR-15 would be implemented to address management issues. In addition, the following site-specific management actions are recommended for the Glen Canyon Park and O'Shaughnessy Hollow Natural Areas:

- GC/OH-1a—reduce woody and herbaceous invasive plants and understory plants and prevent invasive trees from becoming established;
- GC/OH-1b—revegetate with appropriate native plants to approximate the diversity, cover, and density of adjacent habitat;
- GC/OH-1c—augment existing rare or uncommon species to maintain these species and enhance their chances of survival;
- GC/OH-1d—consider reintroduction of sensitive species;
- GC/OH-1e—remove approximately 120 of the estimated 6,000 invasive blue gum eucalyptus trees in Glen Canyon Park to maintain and enhance native habitats;
- GC/OH-2a—thin sections of the overstory within the riparian corridor and reduce invasive plants in the understory;
- GC/OH-2b—prevent willows from encroaching on open water and create new and stable pool habitats;
- GC/OH-3a—to protect sensitive habitats and prevent erosion, close social trails to the northwestern rock outcrop in Glen Canyon Park, discontinue rock climbing, and close social trails in O'Shaughnessy Hollow;
- GC/OH-4a—avoid removing trees with red-tailed hawk or great horned owl nests and prohibit tree removal within 500 feet of occupied nests;
- GC/OH-4b—protect and preserve open grassland habitat through vegetation management and control of invasive species;
- GC/OH-5a—remove invasive species bordering native coastal scrub;
- GC/OH-5b—plant native vegetation of differing heights to increase structural diversity of coastal scrub habitats;
- GC/OH-5c—manage open pools as in GC/OH-2a-b and GC/OH-7e and make these pools inaccessible to the public;
- GC/OH-6a—consider the requirements of amphibians when creating open pools under GC/OH-2;

- GC/OH-7a—document the presence or absence of forktail damselfly in Glen Canyon Park;
- GC/OH-7b—reintroduce forktail damselfly in Glen Canyon Park if it is not observed in the next five years;
- GC/OH-7c—remove and trim vegetation along the asphalt channel to create appropriate habitat for the forktail damselfly, if it is observed or reintroduced;
- GC/OH-7d—remove willows along the asphalt channel to reduce shading of water, if the forktail damselfly is observed or reintroduced;
- GC/OH-7e—control vegetation within the asphalt channel to create open water and emergent vegetation, if the forktail damselfly is observed or reintroduced;
- GC/OH-7f—consider requirements of the forktail damselfly when creating new pools in Islais Creek;
- GC/OH-8a—annually evaluate the populations of sensitive butterflies within the park;
- GC/OH-8b—install larval host plants and nectar sources as part of revegetation;
- GC/OH-9a—monitor the dog impact on wetlands and Islais Creek channel and consider appropriate restrictions (including fencing) to keep dogs out of the creek channel and wetlands;
- GC/OH-9b—install boardwalks in wet marshy locations along the Islais Creek loop trail to prevent damage to resources and increased sedimentation<sup>15</sup> in the creek;
- GC/OH-9c—trim willows along formal trails to allow ease of access, thereby limiting the perceived need to create new trails;
- GC/OH-10a—fill gullies in the access road with gravel to help minimize the input of sediment from the gravel access road, outslope the road the next time it is graded or resurfaced to allow uniform flow of runoff from the hillside across the road to the creek and to eliminate ponding and reduce gullying in the road, evaluate and replace the culverts as necessary, and consider paving the access road;
- GC/OH-10b—close and revegetate social trails that are next to or crossing the creek, in accordance with GR-11, and install bridges or stabilize stream banks with well-designed steps that lead to stepping-stones to cross the creek for any creek crossings that would remain in use;
- GC/OH-10c—maintain the sediment dam and consider installing new sediment traps on the lower reach of the creek; and

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<sup>15</sup>Sedimentation—the deposition of material suspended in a stream system, whether in suspension (suspended load) or on the bottom (bedload).

- GC/OH-10d—consider a long-term solution for the unstable and eroding bank of Islais Creek immediately below Silver Tree Day Camp.

### A.5.13 Golden Gate Heights Park, Grandview Park, Hawk Hill, and Rock Outcrop (GGRH)

#### **General Description**

The Natural Areas at Grandview Park, Rock Outcrop, Golden Gate Heights Park, and Hawk Hill all belong to a remnant ridgetop sand dune system in the western portion of San Francisco, in the mid-Sunset or Sunset Heights area. Because these sites have similar characteristics and management issues, they have been combined into this single section. The 4-acre Grandview Park is at 15th Avenue and Moraga Street. Just south of Grandview Park is the 1.6-acre Rock Outcrop, between 14th and Funston Avenues. Continuing south, Golden Gate Heights Park, which contains a 0.8-acre Natural Area, is between Funston, 12th, and 14th Avenues. Of the four parks, the 4.5-acre Hawk Hill at the intersection of Rivera Street and Funston Avenue is the farthest south. These parks are surrounded by dense urban development.

#### **Management Areas**

The 3.3-acre MA-1 areas include sensitive species, rich dune habitats, and grasslands. Three areas on Grandview, two areas on Rock Outcrop, one area at Golden Gate Heights, and one area at Hawk Hill have been designated as MA-1. The 6.6-acre MA-2 areas contain less-sensitive but important habitat, and they usually surround the MA-1 areas, providing buffers to the more sensitive habitats within MA-1 areas. The 0.8-acre MA-3 areas designated at Grandview and Golden Gate Heights contain areas of invasive tree species.

#### **Recommended Management Actions**

At the Natural Areas at Grandview Park, Rock Outcrop, Golden Gate Heights Park, and Hawk Hill, GR-1 through GR-4, GR-7, and GR-11 through GR-14 would be implemented to address management issues. In addition, the following site-specific management actions are recommended for these sites:

- GGRH-1a—contain and reduce herbaceous and woody invasive plants, removing them in such a way that avoids erosion, and then plant native species;
- GGRH-1b—augment existing sensitive plants to maintain these species and enhance their chances of survival;
- GGRH-1c—reintroduce populations of sensitive plant species to help prevent county-wide extinctions of these species;
- GGRH-1d—prevent invasive trees from becoming established and remove trees only at Grandview Park, where approximately five trees will be removed from the upper slope;
- GGRH-1e—reduce invasive vegetation, plant native species to approximate the diversity, cover, and density of adjacent habitat or reference plots in similar habitats at other parks and target habitat types as follows:

- At Grandview, maintain and enhance dune scrub, a dune scrub mosaic, and cypress tree-scrub mosaic,
- At Rock Outcrop, maintain and enhance the dune scrub-rock outcrop plant communities,
- At Golden Gate Heights, maintain and enhance dune scrub, maintain a diversified understory and plant forest gaps with wildlife friendly species within the urban forest, consider removing the asphalt pad at the entryway and installing a native plant demonstration garden, and
- At Hawk Hill, maintain and enhance the dune scrub communities with scattered open sand for annual plant recruitment;
- GGRH-1f—remove vegetation and replant with native species in small noncontiguous patches where soil erosion could occur;
- GGRH-2a—limit access to the 917 linear feet of designated trails to protect sensitive habitat and consider installing fencing at Hawk Hill if necessary;
- GGRH-2b—consider using the dune-step system as a biotechnical control measure to help control soil movement and allow for revegetation that would better withstand foot traffic on the steep dune slopes;
- GGRH-3a—route users away from eroding areas and sensitive habitats to the 1,313 linear feet of designated trails and install temporary or permanent fencing at Grandview Park if necessary;
- GGRH-3b—install soil retaining boxes on the downhill side of the landings to help minimize erosion at Grandview Park; and
- GGRH-4a—develop a new approximately 188-foot trail at the edge of the forest to replace the trail that is causing erosion and close the 390-linear-foot social trail through the dunes (Golden Gate Heights).

#### A.5.14 Golden Gate Park Oak Woodlands (OW)

##### **General Description**

The 26.2-acre Oak Woodlands Natural Area is in the northeast corner of the 1,021-acre Golden Gate Park, between Fulton Street and Lincoln Way. In addition to the large oak woodland bounded by Stanyan Street, Fulton Street, and 6th Avenue, the Natural Areas in Golden Gate Park include Whiskey Hill, Strawberry Hill, and Lily Pond. The individual areas that compose this Natural Area represent the few places where native trees persist in the Natural Areas Program system. Two DPAs are within or next to the Natural Area, one where North Willard Street intersects with Fulton Street (Golden Gate Park Northeast DPA) and one next to Whiskey Hill (Golden Gate Park Southeast DPA).

##### **Management Areas**

The 0.7-acre MA-1 areas contain sensitive plant species. The 25.5-acre MA-2 areas are oak woodlands. There are no MA-3 areas.

### **Recommended Management Actions**

At Oak Woodlands, GR-1, GR-2, GR-4, GR-6, GR-7, GR-9, and GR-11 through GR-14 would be implemented to address management issues. In addition, the following site-specific management actions are recommended for the Oak Woodlands Natural Area:

- OW-1a—contain and reduce herbaceous and woody invasive plants and prevent invasive tree species from becoming established;
- OW-1b—reduce invasive vegetation within the oak woodlands to increase and diversify the native understory;
- OW-1c—augment and reintroduce native plant species;
- OW-1d—remove approximately 82 of the approximately 900 invasive blue gum eucalyptus trees;
- OW-2a—redesign the organic material dump site and install traffic barricades at the edge of the slope to reduce damage to downslope oak trees;
- OW-3a—remove invasive understory vegetation and replace it with native species typical of an oak woodland understory; and
- OW-4a—monitor use of Golden Gate Park Northeast DPA and install signs to delineate the boundaries of both DPAs.

#### **A.5.15 India Basin Shoreline Park (IB)**

### **General Description**

India Basin Shoreline Park is in southeast San Francisco next to Hunters Point Boulevard at the shore of San Francisco Bay. Comprising 6.2 of the park's 11.8 acres, the Natural Area is the only one that borders San Francisco Bay. It contains a segment of the Bay Trail, shoreline access for fishing and water-dependent recreation, tidal salt marsh wetlands, and suitable habitat for shore birds and foraging raptors.

### **Management Areas**

The 3.2-acre MA-1 area consists of salt marsh wetland. The 2.8-acre MA-2 areas include a buffer between restored wetlands and upland habitat, annual grasslands, scrub, and oak habitat areas under development. There are no MA-3 areas.

### **Recommended Management Actions**

At India Basin Shoreline Park, GR-1 through GR-4, GR-7, and GR-13 would be implemented to address management issues. In addition, the following site-specific management actions are recommended for the India Basin Shoreline Park Natural Area:

- IB-1a—monitor the salt marsh for smooth cordgrass and other invasive species and reduce and contain infestations of upland invasive species;
- IB-1b—remove invasive species from wetland and upland areas and maintain and enhance upland areas as a grassland-coastal scrub mosaic;

- IB-1c—augment populations of alkali heath and marsh gumplant by direct seeding or planting;
- IB-2a—maintain and enhance existing grassland-scrub mosaic;
- IB-2b—install low-growing plants to create a partially vegetated screen between the trail and the buffer area;
- IB-3a—increase vegetation density in the area of the trail to reduce erosion on the face of the levee; and
- IB-4a—restrict access to sensitive salt marsh habitat if damage to these areas occurs, including installing low trailside fencing.

#### A.5.16 Interior Greenbelt (IG)

##### **General Description**

Interior Greenbelt is on Mount Sutro, south of Golden Gate Park and north of Twin Peaks in central San Francisco. Of the two parcels that make up the 16.5-acre Natural Area, the northern parcel (owned by the University of California San Francisco) is accessed at the end of Edgewood Street and at the corner of Stanyan Street and Belgrave Avenue. The southern parcel is south across Clarendon Street from the northern parcel and is accessed at the ends of Mt. Spring and Saint Germain Streets. Both parcels are urban forests.

##### **Management Areas**

The 1.8-acre MA-2 areas are in the northern parcel and support sensitive plants. The 14.7-acre MA-3 areas include the urban forests outside the MA-2 areas. There are no MA-1 areas.

##### **Recommended Management Actions**

At Interior Greenbelt, GR-1, GR-2, GR-4, GR-7, GR-9, GR-11 through GR-15 would be implemented to address management issues. In addition, the following site-specific management actions are recommended for the Interior Greenbelt Natural Area:

- IG-1a—reduce and contain herbaceous invasive plants and prevent invasive trees from becoming established;
- IG-1b—remove approximately 140 of the estimated 5,800 blue gum eucalyptus trees;
- IG-1c—revegetate using appropriate native plants in those areas where invasive plants have been removed to maintain and enhance the existing scrub mosaic communities;
- IG-1d—augment existing populations of sensitive plants;
- IG-1e—reintroduce rare plants to reduce the potential for local extinction of sensitive species in San Francisco;
- IG-2a—develop a new trail linking existing secondary trails with trails on the University of California property; and

- IG-2b—formalize existing social trails.

#### A.5.17 Kite Hill (KH)

##### **General Description**

Kite Hill is a grassy knoll in the central portion of San Francisco, near the intersection of 19th and Yukon Streets. Most of the 2.7-acre Natural Area is grassland, with an ornamental garden north of the corner of 19th and Yukon Streets.

##### **Management Areas**

The 0.6-acre MA-1 area has native scrub series, rock outcrops, and annual grasslands with high native species diversity. The 0.5-acre MA-2 area buffers the MA-1 area and includes native landscaping along the Yukon Street frontage. The 1.6-acre MA-3 area has grasslands in the eastern portion of the Natural Area.

##### **Recommended Management Actions**

At Kite Hill, GR-1 through GR-4, GR-7, and GR-9 through GR-14 would be implemented to address management issues. In addition, the following site-specific management actions are recommended for the Kite Hill Natural Area:

- KH-1a—contain and reduce herbaceous and woody invasive plants and prevent invasive tree species from becoming established;
- KH-1b—maintain and diversify grasslands, with the initial focus on areas where native species are dominant;
- KH-1c—install showy native vegetation near the road and access points;
- KH-1d—reintroduce populations of rare plant species to help prevent local extinctions of these species in San Francisco;
- KH-1e—maintain and enhance the grassland-scrub oak woodland ecotone<sup>16</sup> to increase habitat diversity and value to wildlife; and
- KH-2a—revegetate a large area of exposed soil surrounding a small group of apple trees by hand-broadcasting the appropriate seed mixture and by applying mulch to the area. Install signs explaining the benefits of this revegetation.

#### A.5.18 Lake Merced (LM)

##### **General Description**

Lake Merced is in the southwest portion of San Francisco and is roughly bordered by John Muir Drive, Skyline Boulevard, and Lake Merced Boulevard. The San Francisco Public Utilities Commission (SFPUC) owns Lake Merced, and the SFRPD maintains the recreational uses under the terms of a memorandum of understanding between the two

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<sup>16</sup>Ecotone—a transitional zone between two vegetation communities that contains the characteristic species of each community.

departments. Recreation at the lake includes boating, fishing, golfing, jogging, bicycling, skeet shooting, and picnicking. Lake Merced is made up of four connected sub-lakes: North, East, South, and Impound. A designated DPA on the north side of East Lake is in an area informally known as the Mesa. The Natural Area covers approximately 395 of the lake's 614 acres and generally encompasses the lake, the bordering freshwater marsh wetland, and upland vegetation.

### **Management Areas**

The 60.8-acre MA-1 areas include double-crested cormorant rookeries,<sup>17</sup> a portion of the Mesa that supports sensitive plant species, Impound Lake and its associated wetlands, and tule marsh around East, North, and South Lakes. The 101.8-acre MA-2 areas include the water of East Lake, which supports western pond turtles, and the habitat between the marshes and the Natural Area boundary. The 231.5-acre MA-3 areas include urban forests and North and South Lakes.

### **Recommended Management Actions**

At Lake Merced, GR-1, GR-2, GR-4, GR-6, GR-7, GR-9, and GR-11 through GR-15 would be implemented to address management issues. In addition, the following site-specific management actions are recommended for the Lake Merced Natural Area:

- LM-1a—contain and reduce herbaceous and woody invasive plants and plant native species;
- LM-1b—remove approximately 134 of the estimated 12,000 invasive blue gum eucalyptus trees, a little more than one percent of the total inventory, to maintain and enhance native habitats;
- LM-1c—prevent the establishment of invasive tree species to maintain and enhance coastal wetland scrub;<sup>18</sup>
- LM-1d—maintain and enhance sensitive habitats;
- LM-2a—augment existing sensitive plants to maintain these species and enhance their chances of survival;
- LM-2b—reintroduce populations of rare plant species to help prevent county-wide extinctions of these species;
- LM-3a—remove trees in such a way as to avoid removing those used by raptors, cormorants, and herons and remove no trees within 500 feet of occupied nests;
- LM-3b—consider closing social trails near cormorant nesting colonies or hawk nests if trail usage appears to disrupt nesting. Install signs at rental boat launch locations asking boaters to remain at least 30 feet from the edge of the marsh between February 1 and August 31;
- LM-3c—remove invasive understory vegetation when bird nests are not active;

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<sup>17</sup>Rookery—colony or aggregation of animals of the same species.

<sup>18</sup>Scrub—low trees or shrubs collectively.

- LM-3d—locate and map raptor nests during inactive periods;
- LM-4a—maintain and enhance important bird nesting and foraging habitat to include removal of invasive species and natural recruitment of preferred species;
- LM-5a—create more open grassland habitat through vegetation management and control of invasive species;
- LM-5b—remove iceplant to create openings where native grasslands and grassland/scrub mosaics could be established;
- LM-6a—remove invasive vegetation and enhance native scrub and grassland species in upland sandy soils next to East Lake to allow for western pond turtle nesting. Create piles of logs or rocks to increase and improve basking habitat;
- LM-6b—periodically trap and remove nonnative turtle species;
- LM-6c—restrict public access to the East Lake water and shoreline from April 1 to August 31 to avoid disturbing breeding turtles;
- LM-7a—relocate the DPA to a different area to avoid disturbing breeding birds in the current location;

(Note: Due to the CCSF moratorium on new DPAs, the Lake Merced DPA couldn't be relocated to a new location, so it would only be removed. Restoration of the site would continue, following removal of the DPA.)

- LM-8a—implement GR-14;
- LM-8b—consider participating in the development of an environmental education center;

(Note: Constructing and operating an environmental education center are not proposed as part of the SNRAM and the project. Should those activities be proposed at some point, the appropriate level of CEQA analysis would be undertaken, and applicable permits and other regulatory agency approvals would be obtained.)

- LM-8c—maintain existing interpretive signs at key locations;
- LM-9a—treat small-scale erosion gullies with such measures as gully plugs, brush boxes, energy dissipaters, and water bars and plant these areas with native vegetation to prevent soil erosion;
- LM-9b—coordinate with the San Francisco Department of Public Works and other agencies about programs to address large-scale erosion gullies;
- LM-10a—create an educational program for golf course staff; and
- LM-10b—install informational and interpretive signs next to Lake Merced, along the periphery of Harding Park Golf Course, indicating that the area is sensitive wildlife habitat and install temporary barriers along sensitive areas during large golf tournaments.

## A.5.19 McLaren Park (MP)

### **General Description**

McLaren Park covers 312.6 acres near the southeast corner of San Francisco and is bisected by Mansell Street. Sunnydale and Visitacion Avenues cross the southern half of the park, while John F. Shelley Drive crosses the northern half. Recreational facilities within the park include over 11 miles of trails, tennis courts, ball fields, a golf course, picnic areas, and an amphitheater. Three designated DPAs are within the park, two within and one next to the Natural Area. The Natural Area covers 165.3 acres and is made up of grassland, scrub, and tree-dominated vegetation series.

### **Management Areas**

The 34.9-acre MA-1 areas include sensitive riparian habitat, grassland habitat, marsh habitat, and an area of diverse grasslands supporting sensitive plant species. The 68.3-acre MA-2 areas may also contain sensitive species<sup>19</sup> and habitats and act as buffers between the MA-1 areas and the adjacent urban forest. These areas are being restored, and trees and shrubs are being removed, and native species are being planted. The 61.4-acre MA-3 areas include urban forests, grasslands, and forest-grassland mosaics.

### **Recommended Management Actions**

At McLaren Park, GR-1 through GR-4, GR-6, GR-7, and GR-9 through GR-15 would be implemented to address management issues. In addition, the following site-specific management actions are recommended for the McLaren Park Natural Area:

- MP-1a—reduce and contain herbaceous and woody invasive plants;
- MP-1b—remove approximately 809 of the estimated 19,500 invasive blue gum eucalyptus trees to enhance sensitive species habitats;
- MP-1c—revegetate, using appropriate native plants in those areas where invasive plants have been removed;
- MP-1d—augment existing sensitive plants to prevent the extinction of rare or uncommon grassland plants in McLaren Park;
- MP-1e—reintroduce rare plant species to help prevent local extinction of sensitive species in San Francisco;
- MP-2a—increase the patch size of willow and coastal scrub by removing invasive species that border these areas and allowing natural recruitment into the newly opened areas;
- MP-2b—increase the structural diversity of habitats by planting native vegetation that is different in height from the existing plants;
- MP-2c—restrict foot traffic in the Gray Fox Creek area;

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<sup>19</sup>Sensitive species—species that are listed on the California Native Plant Society plant list or *Inventory of Rare and Endangered Vascular Plants*.

- MP-3a—remove fruiting plants only in the very early spring before nesting starts but after wintering birds have left;
- MP-4a—install spring boxes or small artificial pool habitats associated with springs and seeps to enhance amphibian habitat;
- MP-5a—continue to control emergent vegetation in Yosemite Marsh to prevent cattails from completely clogging the open water areas;
- MP-5b—continue to allow the development of an unmowed grass buffer along the channel between Yosemite Marsh and the recreation area;
- MP-5c—routinely monitor the San Francisco forktail damselfly population;
- MP-5d—create an environmental education program for all SFRPD personnel that work at McLaren Park;
- MP-5e—to protect the existing population of the San Francisco forktail damselfly at Yosemite Marsh, do not add any fish to the pond;
- MP-6a—conduct an annual evaluation of the mission blue butterfly population;
- MP-6b—install larval host plants and nectar sources as part of revegetation efforts;
- MP-7a—install signs and temporary barriers along the roadway to protect sensitive areas from off-road vehicles;
- MP-8a—restrict access to sensitive habitat areas if damage continues;
- MP-9a—eliminate dog access to a portion of Gray Fox Creek and convert the area around the creek to an on-leash area, resulting in the loss of 8.3 acres of DPA; and
- MP-9b—monitor native grassland and wildflower areas within the remaining off-leash area of the Shelley Loop DPA.

#### A.5.20 Mount Davidson (MD)

##### **General Description**

Mount Davidson is in south-central San Francisco just south of Portola Drive and partly next to Juanita Avenue, Dalewood Way, and Molimo Drive in the Miraloma neighborhood. Forests dominate the landscape, covering three-quarters of the 40.2-acre Natural Area. Developed facilities are minimal. Mount Davidson is a highly visible focal point within San Francisco and supports a diverse array of habitats, plants, and animals.

##### **Management Areas**

The 8.8-acre MA-1 areas include two areas on the east-facing slope where the native Franciscan coastal scrub (huckleberry and reed grass) and grasslands are found and another area in the understory of the eucalyptus forest where populations of Pacific reed grass persist. The 11-acre MA-2 areas may also contain sensitive species, and its habitats serve as buffers between the extensive urban forests and the MA-1 areas. At Mount Davidson, the 20.1-acre MA-3 area is composed entirely of urban forest.

### **Recommended Management Actions**

At Mount Davidson, GR-1, GR-2, GR-4, GR-6, GR-7, GR-9, and GR-11 through GR-15 would be implemented to address management issues. In addition, the following site-specific management actions are recommended for the Mount Davidson Natural Area:

- MD-1a—reduce woody and herbaceous invasive plants, prevent invasive tree species from establishing, and reduce understory plants;
- MD-1b—remove approximately 1,600 invasive blue gum eucalyptus trees of the estimated 11,000 invasive trees to maintain and enhance native habitats;
- MD-1c—revegetate using appropriate native plants, enhance and diversify existing grasslands and coastal scrub habitats, and plant the understory and forest gaps, in accordance with GR-15;
- MD-1d—augment existing rare or uncommon species to maintain these species and enhance their chances of survival;
- MD-1e—reintroduce populations of rare plant species to help prevent county-wide extinctions of these species;
- MD-2a—remove invasive species bordering native scrub, and connect isolated patches of shrubs with plantings and brush piles;
- MD-2b—plant native species of differing heights to increase structural diversity;
- MD-3a—remove fruiting invasive plants after breeding season and after native replacements mature to fruiting stage; and
- MD-4a—consider establishing a permanent water source for birds and other native animals and provide breeding habitat for amphibians.

#### **A.5.21 Palou-Phelps (PP)**

### **General Description**

Palou-Phelps Park covers 2.5 acres near the intersection of Palou and Phelps Streets in southeastern San Francisco. The park has a playground area at the northern entry. The 2.1-acre Natural Area has a vegetated slope made up primarily of grasslands.

### **Management Areas**

The 0.8-acre MA-1 area is rich grassland above the playground that includes purple needlegrass prairie. The 0.4-acre MA-2 area supports natural resources and serves as a buffer for the MA-1 area. The MA-3 0.8-acre area contains invasive scrub series and trees in the eastern portion of the Natural Area.

### **Recommended Management Actions**

At Palou-Phelps, GR-1 through GR-4, GR-7, and GR-9 through GR-14 would be implemented to address management issues. In addition, the following site-specific management actions are recommended for the Palou-Phelps Natural Area:

- PP-1a—reduce and contain herbaceous and woody invasive plants and prevent invasive trees from becoming established;
- PP-1b—revegetate with appropriate native plants those areas where invasive vegetation has been removed;
- PP-1c—reintroduce sensitive plants;
- PP-1d—maintain the existing mosaic of urban forest and grassland; and
- PP-2a—close an unsafe social trail segment leading southeast from the playground and investigate the best possible route to reach the southern portion of the Natural Area.

#### A.5.22 Pine Lake (PL)

##### **General Description**

The 8.4-acre Pine Lake Natural Area is within the 30.3-acre Pine Lake Park. The Natural Area is bounded in part by Wawona Way on the north and Crestlake Drive on the west and south sides. The eastern edge of Pine Lake abuts the Stern Grove Park Recreation Area. Surrounded on three sides by an urban forest, Pine Lake (or Laguna Puerca), with a water surface area of approximately 1.7 acres, is one of the few natural lakes in San Francisco. Most of Pine Lake's undeveloped areas are covered with nonnative blue gum eucalyptus forest. A designated DPA exists in the meadow to the east of the Natural Area.

##### **Management Areas**

The one-acre MA-1 area at Pine Lake is associated with the wetland habitat in the lake. The 3.8-acre MA-2 area includes the bulk of the open water, willow habitat, and buffer area around the MA-1 area. The 3.6-acre MA-3 areas are those that are less sensitive and not a priority for direct management; they include the urban forest on the slopes that surround Pine Lake.

##### **Recommended Management Actions**

At Pine Lake, GR-1, GR-2, GR-4, GR-6, GR-7, GR-9, and GR-11 through GR-15 would be implemented to address management issues. In addition, the following site-specific management actions are recommended for the Pine Lake Natural Area:

- PL-1a—reduce populations of invasive plants, including understory plants, periodically remove water primrose to preserve the open water of Pine Lake, prevent invasive trees from becoming established, and prune invasive trees to create light windows to encourage plant growth in the understory;
- PL-1b—revegetate with appropriate native plants that are consistent with the planting plans for the Pine Lake Park Improvement Project (now underway) and with the diversity, cover, and density of reference plots in similar habitats around San Francisco, enhance and diversify existing wetlands and willow riparian areas, and develop and maintain a continuous riparian corridor to Pine

Lake at the base of the slope on the south side of the Natural Area to increase available habitat for birds;

- PL-2a—locate and map raptor nests during inactive periods, avoid removing trees used by raptors, and prohibit tree removal activities within 500 feet of occupied nests;
- PL-3a—remove invasive species to increase the patch size of willows and coastal scrub and create larger habitat units by encouraging willows to form a continuous riparian corridor to the lake;
- PL-3b—install native plants of different height from existing habitats to increase structural diversity;
- PL-3c—install native hydrophytic vegetation that provides cover and foraging habitat for resident and migratory waterfowl along the degraded shoreline of Pine Lake;
- PL-4a—determine the presence, population, and reproduction status of western pond turtles at Pine Lake;
- PL-4b—relocate any western pond turtles to the higher-quality habitat at Lake Merced;
- PL-5a—consider reintroducing Pacific chorus frogs into Pine Lake;
- PL-5b—consult with the California Department of Fish and Game before introducing any species;
- PL-6a—reopen the concrete trail on the western end of the Natural Area if it allows safe public access, otherwise close the concrete trail and develop a nearby alternate route; remove old concrete and revegetate the site;
- PL-6b—maintain and improve 2,144 linear feet of primary trails throughout the Natural Area and reroute or close degraded areas and social trails;
- PL-7a—in accordance with the Sigmund Stern Grove and Pine Lake Park Improvement Plan, provide two dedicated access points to Pine Lake (one at the beach at the east end and one overlooking the lake at the west end) and reduce uncontrolled shoreline access;
- PL-7b—restrict dog access to the lake; and
- PL-7c—post signs at the lake regarding prohibitions against dog access in the lake.

#### A.5.23 Sharp Park (SP)

##### **General Description**

The 411-acre Sharp Park is in the town of Pacifica in San Mateo County. The park borders the Pacific Ocean and is bisected by Highway 1. The Sharp Park Golf Course and Laguna Salada are on the western side of Highway 1. An archery range and extensive canyon are on the eastern side. Sharp Park Road cuts through the northern edge of Sharp Park, east

of Highway 1. Sanchez Creek originates in the upper canyon of Sharp Park and approximately bisects the park in an east-west direction. Sharp Park is one of the largest SFRPD parks and is surrounded by significant open spaces. Mori Point, recently acquired by the GGNRA, borders the southwestern edge, and the Sweeney Ridge GGNRA borders the park on the southeastern and eastern edges. The northern side of Sharp Park is bordered by undeveloped areas within the cities of Pacifica and San Bruno.

The Natural Areas account for 237.2 acres within Sharp Park and encompass the upper canyon areas, portions of Sanchez Creek, and the Laguna Salada wetlands and associated vegetation. The vegetation of Sharp Park is dominated by invasive forest and a golf course, but the park also contains significant areas of wetlands and scrub vegetation.

### **Management Areas**

The Sharp Park management areas include the wetlands associated with Laguna Salada and Horse Stable Pond, grassland and scrub areas, and the urban forests of the canyon. The 35-acre MA-1 areas include three areas in the upper canyon and three in the Laguna Salada area. The 125.1-acre MA-2 areas surround each MA-1 in the upper canyon, may also contain sensitive species and habitats, and provide buffers between the extensive urban forests and the MA-1 areas. Many of the MA-2 areas in the upper canyon also support diverse assemblages of scrub vegetation that provide important structural diversity. The 76.5-acre MA-3 areas at Sharp Park include most of the areas that are dominated by invasive trees but that are lacking the understory complexity found in the MA-2 areas.

### **Recommended Management Actions**

At Sharp Park, GR-1, GR-2, GR-4, and GR-6 through GR-15 would be implemented to address management issues. In addition, the following site-specific management actions are recommended for the Sharp Park Natural Area:

- SP-1a—reduce woody and herbaceous invasive plants, prevent invasive tree species from being established, and reduce invasive understory plants;
- SP-1b—remove approximately 15,000 invasive blue gum eucalyptus of the estimated 54,000 invasive trees to maintain and enhance native habitats;
- SP-1c—revegetate using appropriate native plants, enhance and diversify existing wetlands, creek grasslands, and coastal scrub habitats to approximate the diversity, cover, and density of reference sites around San Francisco, and plant the understory and forest gaps in accordance with GR-15;
- SP-1d—augment existing rare or uncommon grassland species to maintain these species and enhance their chances of survival;
- SP-1e—consider reintroducing sensitive species;
- SP-2a—implement a control program for feral pigs;
- SP-3a—preserve natural or biodegradable elements (branches, trees, and logs) during vegetation management and remove other materials;

- SP-4a—implement improvements to protect and enhance the California red-legged frog and San Francisco garter snake at Laguna Salada, including the following
  - Create shallow pools within existing wetlands,
  - Continue monitoring California red-legged frogs and San Francisco garter snakes,
  - Remove tires from Horse Stable Pond,
  - Install signs and barriers to keep dogs out of Horse Stable Pond,
  - Separate the small peninsulas within Laguna Salada from the mainland by small canals, and
  - Restore Sanchez Creek by deepening the channel, expanding the creek corridor upstream, and buffer zones to limit human disturbance;
- SP-4b—create low mounds, planted with willows, on the western edge of Laguna Salada to serve as a visual barrier, to provide snake and frog basking sites, and to provide nesting habitat for riparian birds;
- SP-4c—reduce draw-down of Horse Stable Pond when California red-legged frog egg masses are present or maintain a stable water level during red-legged frog breeding season;
- SP-4d—remove any bullfrogs that are found in Laguna Salada;
- SP-4e—stop all golf course vehicles from using the service road from Moose Lodge to Horse Stable Pond;
- SP-5a—work with golf course staff to minimize use of chemicals;
- SP-6a—coordinate with the golf course to remove aquatic vegetation within the channel every spring and fall;
- SP-6b—remove and trim vegetation along the edges of the channel between Laguna Salada and Horse Stable Pond to allow forktail damselfly perching within sight of the water;
- SP-7a—develop a plan for safe public access for San Francisco archers to the upper canyon and nearby GGNRA lands;
- SP-8a—make 33.3 acres of Arrowhead Pond, Laguna Salada, and Horse Stable Pond off limits to dogs to prevent access to sensitive habitats; if this is not effective, use fencing to close social trails in these areas;
- SP-9a—educate golf course staff about the importance of identifying California red-legged frogs, San Francisco garter snakes, and forktail damselflies and their habitats;
- SP-9b—establish a vegetation management plan for the canal connecting Laguna Salada and Horse Stable Pond that would allow channel maintenance without affecting the forktail damselfly, California red-legged frog, or San Francisco garter snake;

- SP-9c—create a buffer zone between the Laguna Salada wetlands and the golf course fairways;
- SP-9d—work with golf course maintenance staff to incorporate native plants within bank stabilization efforts along Sanchez Creek where it flows through the golf course;
- SP-10a—backfill trenches with nearby loose soil, replant with appropriate native vegetation;
- SP-11a—develop and implement a comprehensive plan to control the erosion in the extensive area of eroded badlands in the isolated northern portion of the park bounded by the loop in Sharp Park Road; and
- SP-12a—work with other divisions of the SFRPD as necessary to facilitate cleanup and remediation of the former rifle range.

(Note: Because these cleanup and remediation activities are part of a separate process lead by the SFRPD Capital Division, they are not addressed as part of the SNRAMP in this Initial Study.)

#### A.5.24 Tank Hill (TK)

##### **General Description**

Tank Hill is in central San Francisco on Twin Peaks Boulevard near Golden Gate Park. The Natural Area is a 2.9-acre grassy knoll rich in local plant species. The property is publicly accessible via a wooden stairway from Twin Peaks Boulevard and a retained-earth stairway at the end of Belgrave Street.

##### **Management Areas**

The 1.5-acre MA-1 areas are grassland and rock outcrops that support sensitive species. The 0.6-acre MA-2 areas buffer the MA-1 areas. The 0.7-acre MA-3 areas include tree-dominated habitats and steep slopes in the southern portion of the Natural Area.

##### **Recommended Management Actions**

At Tank Hill, GR-1, GR-2, GR-4, GR-7, and GR-9 through GR-14 would be implemented to address management issues. In addition, the following site-specific management actions are recommended for the Tank Hill Natural Area:

- TK-1a—contain and reduce herbaceous and woody invasive plants;
- TK-1b—augment populations of sensitive plant species;
- TK-1c—reintroduce sensitive plant species;
- TK-1d—revegetate areas where invasive plants have been removed with appropriate native species;
- TK-1e—prevent establishment of invasive tree species; and
- TK-2a—following control of invasive species, install native scrub.

## A.5.25 Twin Peaks (TP)

### **General Description**

The 31.1-acre Twin Peaks Natural Areas are north of Mount Davidson and south of Buena Vista Park and Corona Heights. To the north of Twin Peaks are Sutro Tower, a San Francisco Fire Department reservoir, and a parking lot for one of the most popular vista points in San Francisco (popularly known as Christmas Tree Point). The Fire Department property, Christmas Tree Point, and other open space to the north contain Natural Areas, which, when combined with SFRPD property, make a much larger and more viable habitat area. The Natural Areas at Twin Peaks essentially encompass the entire area, except for the roads, viewpoints, and the reservoir.

Twin Peaks has a north-south orientation and is divided into several discontinuous sections by Twin Peaks Boulevard, which winds along its slopes. Twin Peaks' west-facing slopes receive substantial fog and strong winds, while the east-facing slopes receive more sun and warmth. The vegetation is primarily a mix of intergrading patches of grassland and scrub. Twin Peaks offers spectacular views of the surrounding Bay Area and is a world-famous tourist attraction. Twin Peaks receives a high level of recreational use and contains a segment of the Bay Ridge Trail.

### **Management Areas**

Four management areas have been designated at Twin Peaks. The 12.6-acre MA-1a areas include rich native grasslands and sensitive species habitat, including mission blue butterfly habitat. Much of the 14.3-acre MA-2 areas are coastal scrub areas. There are two 3.8-acre MA-3 areas, most of which are along the boundary of the Twin Peaks Natural Area, next to the surrounding residential neighborhoods.

### **Recommended Management Actions**

At Twin Peaks, GR-1, GR-2, GR-4, GR-6, GR-7, GR-9, and GR-11 through GR-14 would be implemented to address management issues. In addition, the following site-specific management actions are recommended for the Twin Peaks Natural Area:

- TP-1a—contain and reduce woody and herbaceous invasive plants;
- TP-1b—augment existing rare or uncommon plant species to help ensure the continued presence of these species, and consider reintroducing sensitive species;
- TP-1c—maintain and enhance existing grassland habitats using diversity, cover, and density targets generated from reference sites around San Francisco, plant native grassland and scrub species, and maintain toyon, oak, and coastal scrub in the tree-dominated areas on the park's edges;
- TP-1d—prevent invasive tree species from becoming established and remove three pine trees out of 88 existing invasive trees;
- TP-2a—continue to monitor the mission blue butterfly population;
- TP-2b—augment host plant populations whenever possible;

- TP-3a—maintain existing fences to route park users to safe and designated trails and develop safe pedestrian access along Twin Peaks Boulevard, including developing approximately 500 feet of new trails, if they are required;
- TP-3b—install signs at all formal access points to show that trails are for foot use only, monitor the use of trails within the area, and install appropriate fencing to prevent wheeled-vehicle access to sensitive habitats if necessary;
- TP-3c—install signs at known habitat areas of the mission blue butterfly indicating on-trail and on-leash access only and consider lining the trail with fences; and
- TP-4a—consider restricting access to or fencing 5.9 acres of mission blue butterfly habitat next to or surrounding the trails.

#### A.5.26 15th Avenue Steps (FI)

##### **General Description**

The 0.3-acre 15th Avenue Steps Natural Area is in the Golden Gate Heights area of San Francisco and is the extension of 15th Avenue, between Kirkham and Lawton Streets. Access is via a set of concrete stairs bisecting the Natural Area, which supports native oak trees and habitat for a variety of resident and migratory bird species.

##### **Management Areas**

The 0.2-acre MA-2 area includes coast live oak trees and California blackberry scrub on both sides of the concrete stairs. There are no MA-1 and MA-3 areas.

##### **Recommended Management Actions**

At 15th Avenue Steps, GR-1, GR-2, GR-4, GR-7, GR-9, GR-11, and GR-12 would be implemented to address management issues. In addition, the following site-specific management actions are recommended for the 15th Avenue Steps Natural Area:

- FI-1a—allow for recruitment of native plants, enhance existing habitats, contain and reduce herbaceous and woody species, remove invasive plants and replace with appropriate dune species; and
- FI-1b—maintain and enhance oak woodland and coastal scrub communities.

#### A.5.27 Everson/Digby Lots

A portion of the Everson/Digby Lots park was recently determined to be a Natural Area. This Natural Area was not addressed in the SNRAMP. The Environmental Impact Report will present information on the recommended management actions for this Natural Area and will analyze the potential environmental impacts associated with those actions.

## B. PROJECT SETTING

CCSF covers the northern portion of the San Francisco Peninsula and encompasses an area of 49 square miles. Small fragments of a unique ecosystem called the Franciscan landscape, part of the larger Bay/Delta region, still exist in San Francisco. The Franciscan landscape developed in the wildlands that once extended from San Bruno Mountain to the Golden Gate Headlands. Its unusual combination of climatic, floristic, and geologic features supported the development of a biologically diverse assemblage of plants and animals, some of which were unique to the area. Most of the remnant fragments of the Franciscan landscape are within the Natural Areas.

The proposed project occurs across 31 Natural Areas totaling approximately 1,105 acres. Of the total Natural Areas acreage, 868 acres are in San Francisco, and 237 are in Pacifica (Sharp Park). The Natural Areas range in size from 0.3 acres (15th Avenue Steps) to 395 acres (Lake Merced). The MA-1 areas cover roughly 193 acres (17 percent), with 430 acres (39 percent) for MA-2 areas and 478 acres (43 percent) for MA-3 areas. Within the Natural Areas are approximately 117,453 trees and 211,303 linear feet of trails.

Descriptions of the project setting for each Natural Area can be found in Section A.5.

**C. COMPATIBILITY WITH EXISTING ZONING AND PLANS**

	<i>Applicable</i>	<i>Not Applicable</i>
Discuss any variances, special authorizations, or changes proposed to the Planning Code or Zoning Map, if applicable.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Discuss any conflicts with any adopted plans and goals of the City or Region, if applicable.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Discuss any approvals and/or permits from City departments other than the Planning Department or the Department of Building Inspection, or from Regional, State, or Federal Agencies.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

This section identifies and discusses applicable regional and local land use plans and policies relevant to the proposed project. The focus of this section is the CCSF land use plans and policies. CCSF land use plans and policies are primarily applicable to projects within the jurisdictional boundaries of San Francisco, although in some cases they may apply to projects outside San Francisco. This information is relevant to the evaluation of impacts of the proposed project with respect to specific significance criteria under CEQA that require analysis of the compatibility of a proposed project with certain aspects of local land use plans and policies.

The Natural Areas are scattered throughout the central and southern portions of the CCSF and constitute four percent of the total city area. Sharp Park is in the city of Pacifica. Most Natural Areas are owned and managed by the SFRPD; Balboa is owned by CCSF and is managed by the National Park Service, while the San Francisco Public Utilities Commission owns, and SFRPD manages, Lake Merced.

The SFRPD is guided by the San Francisco City Charter along with other city plans and policies. These plans include the *San Francisco General Plan*, which sets forth the comprehensive, long-term land use policy for the CCSF, and the *San Francisco Sustainability Plan*, which addresses the long-term sustainability of the City. In addition the SFRPD has created the Natural Areas Program to support and develop a community-based habitat restoration program. These plans and policies, as applicable to the proposed project, as well as other relevant plans and policies, are discussed herein.

**C.1 APPLICABLE PLANS AND POLICIES**

**CCSF Plans and Policies**

**San Francisco General Plan**

One of the basic goals of the *San Francisco General Plan* is “coordination of the growth and development of the City with the growth and development of adjoining cities and counties and of the San Francisco Bay Region.” The general plan consists of ten issue-oriented plan elements—Air Quality, Arts, Commerce

and Industry, Community Facilities, Community Safety, Environmental Protection, Housing, Recreation and Open Space, Transportation, and Urban Design. The plan elements relevant to the proposed project are briefly described below.

Air Quality Element. This element promotes the goal of clean air planning through objectives and policies aimed at adherence to air quality regulations, focusing development near transit services, and advocating alternatives to the private automobile.

Environmental Protection Element. This element addresses the impact of urbanization on the natural environment. The element promotes the protection of plant and animal life and freshwater sources and speaks to the responsibility of San Francisco to provide a permanent, clean water supply to meet present and future needs and to maintain an adequate water distribution system.

Recreation and Open Space Element. This element promotes the goal of preserving and protecting open spaces. Policy 2.13 of the General Plan requires the City to preserve and protect the Significant Natural Resource Areas. Policy 13 includes natural resource areas and naturalistic areas as potential protection and preservation areas. The policy identifies the following criteria used to determine a Significant Natural Resource Area: (1) sites that are undeveloped, relatively undisturbed remnants of San Francisco's original landscape that either support diverse and significant indigenous plant and wildlife habitats or contain rare geologic formations or riparian zones; (2) sites that contain rare, threatened, or endangered species or areas likely to support these species; and (3) areas that are adjacent to other protected natural resource areas. The policy further stipulates that management plans be developed for each of the Natural Areas. Specifically, the policy describes the need to:

- Identify Natural Areas and inventory them;
- Identify the presence of natural resources;
- Describe practices such as exotic plant species removal; and
- Identify policies governing access and recreational uses to ensure that natural resource values are not diminished by public use.

Urban Design Element. This element concerns the physical character and order of the City and the relationship between people and their environment. It provides a general plan, responding to issues relating to City pattern, conservation, major new development, and neighborhood environment.

Western Area Shoreline Plan. The policies of the CCSF Local Coastal Program were incorporated into the general plan as part of this area plan. Applicable area plan policies include the following:

- Objective 3: Enhance the recreational connection between Golden Gate Park and the beach frontage.
  - Policy 3.1: Strengthen the visual and physical connection between the park and beach. Emphasize the naturalistic landscape qualities of the western end of the park for visitor use. When possible eliminate the Richmond-Sunset sewer treatment facilities.
  - Policy 3.2: Continue to implement a long-term reforestation program at the western portion of the park.
  - Policy 3.3: Develop and periodically revise a master plan for Golden Gate Park to include specific policies for the maintenance and improvement of recreational access in the western portion of the park.
  - Policy 3.4: Rehabilitate the Beach Chalet for increased visitor use.
- Objective 5: Preserve the recreational and natural habitat of Lake Merced.
  - Policy 5.1: Preserve in a safe, attractive and usable condition the recreational facilities, passive activities, playgrounds and vistas of Lake Merced area for the enjoyment of citizens and visitors to the city.
  - Policy 5.2: Maintain a recreational pathway around the lake designed for multiple use.
  - Policy 5.3: Allow only those activities in Lake Merced area which will not threaten the quality of the water as a standby reservoir for emergency use.
  - Policy 5.4: As it becomes obsolete, replace the police pistol range on the southerly side of South Lake with recreational facilities.
- Objective 6: Maintain and enhance the recreational use of San Francisco's Ocean Beach shoreline.
  - Policy 6.1: Continue Ocean Beach as a natural beach area for public recreation.
  - Policy 6.2: Improve and stabilize the sand dunes where necessary with natural materials to control erosion.
  - Policy 6.3: Keep the natural appearance of the beach and maximize its usefulness by maintaining the beach in a state free of litter and debris.

- Policy 6.4: Maintain and improve the physical condition and appearance of the esplanade between Lincoln Way and the Cliff House.
- Policy 6.5: Enhance the enjoyment of visitors to Ocean Beach by providing convenient visitor-oriented services, including take-out food facilities.
- Policy 6.6: Extend the seawall promenade south to Sloat Boulevard as funds become available.

Consistency Evaluation. As described above, the *San Francisco General Plan* addresses such elements as air quality, community safety (including protection from geologic and seismic hazards), and environmental protection (including protection of water resources and biological resources and addressing recreation and open space).

The project proposes to restore and manage the Natural Areas. Although the project could impact natural systems, mitigation measures would minimize potential impacts. Implementation of the project would identify natural resources and maintain and preserve native plant and animal communities and local biodiversity. The project would, on the whole, be consistent with the *San Francisco General Plan*.

### **San Francisco Priority Policies**

In November 1986, the voters of San Francisco approved Proposition M, the Accountable Planning Initiative, which added Section 101.1 to the City Planning Code to establish eight Priority Policies. These policies, and the sections of this Environmental Evaluation addressing the environmental issues associated with the policies, are: (1) preservation and enhancement of neighborhood-serving retail uses; (2) protection of neighborhood character (Question 1c, Land Use); (3) preservation and enhancement of affordable housing (Question 3b, Population and Housing, with regard to housing supply and displacement issues); (4) discouragement of commuter automobiles (Questions 5a,b,f and g, Transportation and Circulation); (5) protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership (Question 1C, Land Use); (6) maximization of earthquake preparedness (Questions 13a-d, Geology, Soils, and Seismicity); (7) landmark and historic building preservation (Question 4a, Cultural Resources); and (8) protection of open space (Questions 8a and b, Wind and Shadow, and Questions 9a and c, Recreation). Prior to issuing a permit for any project which requires an Initial Study under CEQA, prior to issuing a permit for any demolition, conversion, or change of use, and prior to taking any action which requires a finding of consistency with the *San Francisco General Plan*, the City is required to find that the proposed project or legislation would be consistent with the Priority Policies. As noted above, the consistency of the proposed project with the environmental topics associated with the Priority Policies is discussed in the

Evaluation of Environmental Effects, providing information for use in the case report for the proposed project. The case report and approval motions for the proposed project would contain the Planning Department's comprehensive project analysis and findings regarding consistency of the proposed project with the Priority Policies. In addition to the *San Francisco General Plan*, some areas of the city are also addressed in specific area plans.

### **Sustainability Plan for San Francisco**

The *Sustainability Plan for San Francisco* (CCSF 1996b) was endorsed by the San Francisco Board of Supervisors in 1997, although the Board of Supervisors has not committed the City to perform the actions addressed in the plan. The plan serves as a blueprint for sustainability, with many of its individual proposals requiring further development and public comment. The underlying goals of the plan are to maintain the physical resources and systems that support life in San Francisco and to create a social structure that will allow such maintenance. It is divided into 15 topic areas, 10 that address specific environmental issues (Air Quality; Biodiversity; Energy, Climate Change and Ozone Depletion; Food and Agriculture; Hazardous Materials; Human Health; Parks, Open Spaces and Streetscapes; Solid Waste; Transportation; and Water and Wastewater), and five that are broader in scope and cover many issues (Economy and Economic Development; Environmental Justice; Municipal Expenditures; Public Information and Education; and Risk Management). Each topic area in the plan has a set of indicators that are to be used over time to determine whether San Francisco is moving in a sustainable direction in that particular area. The Biodiversity section, which includes 39 specific actions, addresses the goals of increased ecological understanding, protection, and restoration of remnant natural ecosystems; increased habitat value in developed and naturalistic areas; and collection, organization, and development of historic information on habitat and biodiversity.

The *Sustainability Plan for San Francisco* was developed to address San Francisco's long-term environmental sustainability, and it adopted many of the goals and objectives of the 1995 Significant Natural Resource Areas Management Plan. As such, the project would be consistent with the *Sustainability Plan for San Francisco*.

### **Natural Areas Program**

The mission of the Natural Areas Program is two-fold: to restore and enhance remnant Natural Areas and to develop and support community-based stewardship of these areas (CCSF 2008c). Recognizing the functions and value of these Natural Areas and the need to protect and restore them, SFRPD agreed to support and develop a community-based habitat restoration program, today known as the Natural Areas Program.

### **San Francisco Dog Policy**

The SFRPD is the steward of wide-ranging unique landscapes and makes decisions on land management practices. The dog policy reflects the SFRPD Strategic Plan, input from community stakeholder groups, San Francisco Municipal Codes, the 1998 Dog Task Force recommendations, and the best and most relevant efforts of established dog park designs and policies (SFRPD 2002). The SFRPD welcomes dogs on leashes in most of its parks; dogs are allowed off-leash in 19 designated areas. Existing and proposed sites will need to be evaluated in the context of this policy. Dogs are not allowed in some areas, as noted in Section 3.1 (Location) of the policy. The policy supports continued and increased education about how to be a responsible park user with a pet.

### **Laguna Salada Resource Enhancement Plan**

The *Draft Laguna Salada Resource Enhancement Plan* was developed to enhance the Laguna Salada wetlands (Philip Williams & Associates, et al. 1992). While providing valuable wetland habitat for a variety of vegetation and wildlife species, the site represents critical habitat for the San Francisco garter snake, San Francisco forktail damselfly, California red-legged frog, and salt marsh yellowthroat (a bird species). The main element of the enhancement plan involves dredging to remove accumulated sediments and to provide open water in areas choked by emergent vegetation.

### **San Francisco Bay Basin (Region 2) Water Quality Control Plan**

Water for recreation and habitat is associated with the Natural Areas. The San Francisco Bay Basin (Region 2) Water Quality Control Plan contains water quality regulations adopted by the San Francisco Bay Regional Water Quality Control Board. It has been approved by the State Water Resources Control Board, the Office of Administrative Law, and US Environmental Protection Agency (EPA) (San Francisco Bay Regional Water Quality Control Board 2007). It also contains statewide regulations adopted by the State Water Resources Control Board and other state agencies that refer to activities regulated by the board.

### **San Francisco Bay Plan**

The San Francisco Bay Plan guides the protection and development of the bay and its tributary waterways, marshes, managed wetlands, salt ponds, and shoreline (San Francisco Bay Conservation and Development Commission 2008). A major plan proposal is to develop waterfront parks and recreation facilities. New shoreline parks, beaches, marinas, fishing piers, scenic drives, and hiking or bicycling pathways should be provided in many areas. The bay and its shoreline offer particularly important opportunities for recreational development in urban areas where large concentrations of people live close to the water but are shut off from it. Highest priority should be given to recreational development in these areas as an important means of helping to immediately relieve urban tensions.

### **General Land Use Plans and Policies of Other Jurisdictions**

Although the SFRPD is not legally bound to the land use plans and policies of other jurisdictions, non-CCSF land use plans are discussed in this section to the extent that they provide land use planning information for the jurisdictions in which the proposed project is located. This information is relevant to evaluate the impacts of the proposed project with respect to the specific significance criteria under CEQA that require an analysis of the compatibility of a proposed project with certain aspects of local land use plans and policies. These particular significance criteria are listed below along with the location in this document where the reader can find the impact evaluation:

- Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan (analyzed in Section E.16, Mineral and Energy Resources, page 131);
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (analyzed in Section E.12, Biological Resources, page 98);
- Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan (analyzed in Section E.12, Biological Resources, page 98);
- Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., conflict with policies promoting bus turnouts, bicycle racks, etc.), or cause a substantial increase in transit demand that cannot be accommodated by existing or proposed transit capacity or alternative travel modes (analyzed in Section E.5, Transportation and Circulation, page 74);
- Expose people to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies (analyzed in Section E.6, Noise, page 76);
- For a project located within an area covered by an airport land use plan (or, where such a plan has not been adopted, within two miles of a public airport or public use airport), expose people residing or working in the project area to excessive noise levels (analyzed in Section E.6, Noise, page 76); and
- Conflict with existing zoning for agricultural use or a Williamson Act<sup>20</sup> contract (analyzed in Section E.17, Agriculture Resources, page 132).

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<sup>20</sup>Williamson Act—also known as the Land Conservation Act of 1965, provides for lowered property taxes for lands maintained in agricultural and certain open space uses. Under a Williamson Act contract, generally the landowner agrees to limit the use of the land to agriculture and compatible uses for a period of at least 10 years. In return, the land is taxed at a rate based on the agricultural production of the land, rather than its real estate market value.

## C.2 OTHER COMPLIANCE AND PERMITTING REQUIREMENTS

In addition to compliance with CEQA, the proposed project may be subject to additional compliance and permitting requirements administered by various federal, state, and local resource agencies. These agencies include:

- The US Fish and Wildlife Service (USFWS), which enforces regulations regarding the health of wildlife and wildlife habitat, particularly in accordance with Section 7 of the Endangered Species Act (ESA) and the Migratory Bird Treaty Act (MBTA);
- The US Army Corps of Engineers (USACE), which regulates wetlands and Waters of the United States under Section 404 of the Clean Water Act;
- The California Department of Fish and Game (CDFG), which protects special status species listed under the California Endangered Species Act and regulates streambed alteration under Section 1602 of the California Fish and Game Code;
- The Bay Area Regional Water Quality Control Board (RWQCB) for a National Pollutant Discharge Elimination System general construction activity permit (and associated stormwater pollution prevention plan) and Water Quality Certification under Section 401 of the Clean Water Act. The RWQCB regulates regional water bodies and wetlands, particularly in terms of water quality, in accordance with Section 401 of the Clean Water Act;
- National Marine Fisheries Service, under Section 7 of the Endangered Species Act;
- California Air Resources Board and Bay Area Air Quality Management District;
- California Office of Historic Preservation;
- California Native American Heritage Commission;
- California Coastal Commission; and
- Bay Conservation and Development Commission.

**D. SUMMARY OF ENVIRONMENTAL EFFECTS**

The proposed project could potentially affect the environmental factor(s) checked below. The following pages present a more detailed checklist and discussion of each environmental factor.

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> Land Use                                 | <input type="checkbox"/> Air Quality                     | <input type="checkbox"/> Geology and Soils                        |
| <input checked="" type="checkbox"/> Aesthetics                    | <input type="checkbox"/> Wind and Shadow                 | <input checked="" type="checkbox"/> Hydrology and Water Quality   |
| <input type="checkbox"/> Population and Housing                   | <input checked="" type="checkbox"/> Recreation           | <input type="checkbox"/> Hazards/Hazardous Materials              |
| <input checked="" type="checkbox"/> Cultural and Paleo. Resources | <input type="checkbox"/> Utilities and Service Systems   | <input type="checkbox"/> Mineral/Energy Resources                 |
| <input type="checkbox"/> Transportation and Circulation           | <input type="checkbox"/> Public Services                 | <input type="checkbox"/> Agricultural Resources                   |
| <input type="checkbox"/> Noise                                    | <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Mandatory Findings of Signif. |

**E. EVALUATION OF ENVIRONMENTAL EFFECTS**

Under the proposed project, the SFRPD would implement the SNRAMP for 31 diverse Natural Areas, as summarized in Section A. Impacts on the Natural Areas from the proposed project vary, depending upon the type of activity proposed and the Natural Area management needs. For a given significance criterion, the project may have “Less Than Significant Impacts” in several Natural Areas and “Less Than Significant Impacts with Mitigation Incorporated” in other Natural Areas at the same time. For a given significance criterion, the highest impact level applicable to any of the Natural Areas is applied to the project as a whole for that criterion. The impact discussions for each criterion describe the general effects that would occur across the combined Natural Areas or to groups of Natural Areas, followed by discussion of impacts unique in nature or magnitude to specific Natural Areas. A general assumption that is made for the impact analysis is that increased use of the Natural Areas would result from implementing the SNRAMP, due to improved recreation resources and anticipated increases in the general population of San Francisco.

**E.1 LAND USE AND LAND USE PLANNING**

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>1. LAND USE AND LAND USE PLANNING— Would the project:</b>					
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial impact upon the existing character of the vicinity?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

For informational purposes, this topic area will be discussed in the Environmental Impact Report.

a) Because all project activities would occur within the Natural Areas, this criterion is not applicable to the proposed project.

b) In California, land use is regulated through local plans and policies.

In San Francisco, the overall planning framework is set by the San Francisco General Plan, which consists of ten plan elements. General plans are intended to identify features that are unique to each region and identify policies that preserve and reinforce unique values of the community. Each element identifies

objectives and is supported by policy statements and explanations. In addition, eleven neighborhoods have area plans, which recognize unique characteristics and strengths of neighborhoods and introduce objectives and policy statements at the neighborhood level. The concepts of the General Plan are implemented through the zoning code and administrative review processes.

An important value of San Franciscans is represented by Objective 7 of the Environmental Protection Element (CCSF 2004): “Assure that the land resources in San Francisco are used in ways that both respect and preserve the natural values of the land and serve the best interests of all of the city’s citizens.”

Another policy statement is Objective 1 of the Environmental Protection Element: “Achieve a proper balance among the conservation, utilization, and development of San Francisco’s natural resources.”

These principles recognize the need to balance natural resources, conservation, and programming concerns. As such, there is recognition of the logic of removing nonnative species to allow for growth of indigenous plant material and preservation of the natural character of a habitat.

The Recreation and Open Space Element (CCSF 2007a) guides policies over hiking and bicycle trails and advocates developing additional trails along San Francisco Bay (The Bay Trail), on ridgelines, and along the coast, and linking these trails with those in adjacent counties. It defines various classes of open space, including city-serving (Golden Gate Park, McLaren Park), district-serving (larger than 10 acres), neighborhood-serving (less than 10 acres and more than 4 acres), and subneighborhood-serving.

Objective 2 of that element states “Develop and maintain a diversified and balanced citywide system of high quality public open space.” It is supported by Policy 2.8: “Develop a recreational trail system that links city parks and public open space, ridge lines and hilltops, the Bay and ocean, and neighborhoods, and ties into the regional hiking trail system.” The plan identifies several city parks where future segments of these trails should be developed.

The Bay Trail is a resource for pedestrians and bicyclists and passes through the India Basin Natural Area. Of the San Francisco Natural Areas, trails would increase at Edgehill Mountain and Interior Greenbelt. New trails would be created at an additional seven San Francisco Natural Areas.

Policy 2.9, “Maintain and expand the urban forest,” acknowledges the role of urban forests in enhancing the quality of life in San Francisco. The text clarifies the need for replacement of mature trees, and promotes the need for a “major reforestation effort” in the larger city parks. It calls for a systematic inventory of the urban forest, tree replanting, and plant material diversification.

Policy 2.13 is to: "Preserve and protect significant natural resource areas." It specifically addresses the natural resource area management plan and calls for preservation of native plant habitats, inventorying natural areas, and protecting natural areas "to ensure that the natural resource values are not diminished or impacted by public use."

Under Policy 3.5, this element calls for extending the reforestation program within Golden Gate Park "throughout the park to ensure vigorous forest tree growth . . ." Regarding Bayview Park, this section calls for better pedestrian access, which is echoed in the proposed project.

Policy 4.3, "Renovate and renew the City's parks and recreational facilities," acknowledges the need for ongoing assessment and renewal of the City's open space resources.

The Recreation and Park Commission has adopted additional policies pertaining to certain parks, such as the master plans for Buena Vista Park, Glen Canyon Park, Golden Gate Park, McLaren Park, and Pine Lake Park.

The Golden Gate Park Master Plan (SFRPD 1998) identifies three policies that are relevant to the proposed removal of invasive trees. Policy A addresses naturalistic parkland as follows: "Naturalistic parkland comprises the largest land category in Golden Gate Park, and must be preserved to protect the pastoral character of the park and to ensure the retention of park open space. Naturalistic parkland is the predominant landscape of the park and gives the park its visual character."

Policy E focuses on forested indigenous oak preserves and calls for them to be carefully managed to promote their preservation.

The second objective of the plan mandates protection and renewal of the park landscape. Policy B places priority on preservation and renewal of the park's forestry. It calls for "Removal of hazardous, diseased and dying trees; replacement with appropriate tree species." Another goal is "Maintain the designated indigenous oak preserves for their natural and historical values as the only remaining indigenous woodlands in the park, and preserve existing oak trees in other areas."

The proposed project would not conflict with any land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. There would be no change in land uses and no impact under the project, which would serve the objectives of the applicable plans and policies.

c) The proposed project considers changes to vegetation and trails at 31 different Natural Areas. At some parks, the change in tree coverage would be minimal

(two percent of trees), while in others it would be more noticeable (20 percent of trees). In Natural Areas, where large numbers of trees would be removed, the removal would occur gradually and would return the vegetation to a state more consistent with the area's original character. Overall, areas identified for tree removal would result in the removal of 18,448 invasive trees, representing 16 percent of the invasive trees in the parks. At all of the Natural Areas except Sharp Park, invasive trees would be replaced with native trees (3,448 trees replaced). At Sharp Park, 15,000 invasive trees would be removed and replaced with native vegetation; approximately 39,000 invasive trees would remain. Because tree removal in portions of the Natural Areas would not be great enough to substantially alter the overall natural, unique character of the project areas, the impacts would be less than significant.

Although land use impacts would be less than significant, the Environmental Impact Report will include a discussion of land use and land use planning for background purposes.

## E.2 AESTHETICS

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>AESTHETICS—Would the project:</b>					
a) Have a substantial adverse effect on a scenic vista?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and other features of the built or natural environment which contribute to a scenic public setting?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area or which would substantially impact other people or properties?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

In this Initial Study, the Potentially Significant Impact designation is being used solely to identify those topics that will be addressed in detail in the Environmental Impact Report for this project and does not reflect the findings of any preliminary impact analysis. Those topics are being included in the Environmental Impact Report because there is not sufficient information available at this time on the potentially affected resources or site conditions.

A visual quality analysis is somewhat subjective and considers the project in relation to the surrounding visual character, heights and building types of surrounding uses, its potential to obstruct public scenic views or vistas, and its potential for light and glare. A proposed project would have an effect on the visual landscape if it were to cause a noticeable change. The amount of change may be characterized as temporary or permanent or as adverse or beneficial, and it may range from minor to major. With respect to scenic resources involving changes to vegetation, long-term impacts would involve the permanent loss of vegetation or the relatively long time needed for newly planted trees to reach the size of the trees they replaced; short-term impacts would involve the relatively short time needed for replacement shrubs, bushes, and grasses to mature.

a) A scenic vista is a visually appealing view of the distant broad landscape. The San Francisco General Plan does not identify protected scenic vistas in the Recreation and Open Space Element or the Transportation Element (CCSF 2007a and CCSF 2005b). The City of Pacifica General Plan does not identify protected scenic vistas in the Scenic Highways Element, the Conservation Element, the Open Space Element, or the Community Design Element (City of Pacifica 1980).

Also, there is no designated state or county scenic highway<sup>21</sup> near the proposed project (California Department of Transportation 2008).

The following principles for city pattern relating to parks are found in the Urban Design Element of the San Francisco General Plan:

- “Where large parks occur at tops of hills, lowrise buildings surrounding them will preserve views from the park and maintain visibility of the park from other areas of the city. Comment: Areas around Mount Davidson and Twin Peaks have a pattern of low development. The hilltops are therefore citywide focal points of natural landscape, functioning much as Telegraph Hill’s summit does in the North Beach area.”
- “Landscaped pathways can visually and functionally link larger open spaces to neighborhoods. Comment: The roadside planting of Park Presidio and Sunset Boulevard, and the landscape connections between Mount Sutro, Twin Peaks, Laguna Honda and Glen Canyon are examples of a system that links parks and other open spaces to one another. Such linkages, creating strong defining features, can be extended to other parts of the city.”

The plans note the importance to residents and visitors of general scenic vistas, such as those involving ridgelines and beaches. Also, almost all of the Natural Areas include trails, most of which provide general scenic views of San Francisco.

Map 1 in the Urban Design Element in the San Francisco General Plan identifies important vista points to be protected (CCSF 2005a). These points are throughout the City and include, for example, Mount Davidson and Buena Vista Park.

The proposed project does not include permanent human-made structures that would obstruct general scenic vistas, such as those involving ridgelines or vistas of San Francisco from Natural Area trails. The proposed project would not permanently restrict access to important viewpoints (identified in Map 1 in the Urban Design Element in the San Francisco General Plan) from which general vistas are available. Invasive tree removal in San Francisco would be followed by replacement of those trees with native species at a roughly 1:1 replacement ratio, to ensure that views from important points are preserved. In some locations, trees would be replaced by native scrub or grassland species.

The potential impacts on this topic will be analyzed in the Environmental Impact Report.

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<sup>21</sup>Scenic highway—a highway from which a high quality scenic natural landscape can be seen by travelers and with little intrusion by development.

**b)** Scenic resources are the visible physical features on a landscape (e.g., land, water, vegetation, animals, structures, and other features). The scenic resources in the Natural Areas are described in the SNRAMP (SFRPD 2006).

The proposed project would alter scenic resources within the Natural Areas. This would involve, for example, contouring the topography of an area differently and removing certain invasive vegetation to enhance habitat and establish native vegetation. The large-scale removal of vegetation in Natural Areas, such as Sharp Park, Mount Davidson, McLaren Park, and Bayview Park, would occur over time. Initially, impacts on scenic resources<sup>22</sup>, such as diminished vegetation and altered composition and structure of vegetation, would be noticeable. The intensity of the impact would depend on the viewer and their sensitivity to changes to scenic resources at a Natural Area.

Although scenic resources would be altered, they would be altered to restore the natural integrity of the areas by removing and altering resources that are not historically consistent with the local area. Revegetation and the progression of natural processes would gradually reduce the magnitude of impacts. Generally, trees removed would be replaced with native tree species at a roughly 1:1 replacement ratio, although not necessarily at the same location. In some locations, trees would be replaced by native scrub or grassland species. All removed vegetation would be replaced with native vegetation. Promoting the natural integrity of the areas would ultimately reestablish the natural scenic resources typical of the local Natural Area. Note that no Landmark Trees would be removed or altered.

The potential impacts on this topic will be analyzed in the Environmental Impact Report.

**c)** The general setting of the Natural Areas is characterized as being undeveloped, being used for various designated purposes, and being surrounded by an urban environment. The setting of the areas is described in greater detail in the SNRAMP (SFRPD 2006).

As described in Section A.2, the design and aesthetic goals for the Natural Areas are as follows:

- Where possible, to develop aesthetically pleasing landscapes that are consistent with surrounding landscapes and that create natural transitions, especially where adjacent parklands and traditionally landscaped areas abut Natural Areas;
- To maintain and develop viewpoints and viewsheds to enhance park experiences; and

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<sup>22</sup>Scenic resource—the visible physical features on a landscape.

- Where possible, to design and maintain landscapes to discourage the accumulation of trash and illegal encampments.

Policy 1.5 in the Urban Design Element in the San Francisco General Plan emphasizes the special nature of each district through distinctive landscaping and other features. This involves preserving landscaping and installing or encouraging new landscaping. The proposed project would be required to comply with the policies in the Urban Design Element.

During implementation of the proposed project, equipment, such as trucks and bulldozers, would be visible in and around the Natural Areas. The presence of the equipment and project activities would detract from the setting of the areas, resulting in impacts. However, equipment and project activities would be limited in duration and would not occur every day.

Following implementation of the proposed project's activities, the setting of the areas would generally resemble the current setting. One important aspect of the general setting that would be altered by the project's activities involves the vegetation. Initially, impacts on the general setting's vegetation, such as diminished vegetation and altered composition and structure of vegetation, would be noticeable, resulting in impacts. However, vegetation is only one aspect of the general setting. Following implementation of the proposed project's activities, the setting of the areas would ultimately resemble the existing undeveloped setting. While it would be altered, the general setting of the Natural Areas would still resemble an undeveloped area used for various purposes and surrounded by an urban environment.

The potential impacts on this topic will be analyzed in the Environmental Impact Report.

**d)** The proposed project does not include outdoor or indoor lighting or other components that would create new sources of light or glare and would have no impact.

This topic will not be discussed in the Environmental Impact Report.

E.3 POPULATION AND HOUSING

<u>Topics:</u>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>3. POPULATION AND HOUSING— Would the project:</b>					
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing units or create demand for additional housing, necessitating the construction of replacement housing?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a - c) The project does not propose the construction of new homes or businesses and therefore would not result in any direct impacts related to growth inducement. Furthermore, the project would not result in increased use of roadways or extend new infrastructure, such as water and sewer systems, to any undeveloped areas. No new businesses or houses would be constructed or demolished under the proposed project. Workers for the proposed project include up to ten Natural Areas Program gardeners and groups of volunteers of up to 50 people. Any persons that relocate to fill vacant gardener positions would have a negligible effect on the City’s population. Because it is assumed that volunteers reside in the San Francisco Bay Area, the project would not induce substantial population growth, displace substantial numbers of housing units or residents, or create demand for additional housing. The project would have no impacts on population and housing.

These topics will not be discussed in the Environmental Impact Report.

E.4 CULTURAL AND PALEONTOLOGICAL RESOURCES

<u>Topics:</u>	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>	<u>Not Applicable</u>
<b>4. CULTURAL AND PALEONTOLOGICAL RESOURCES—Would the project:</b>					
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5, including those resources listed in Article 10 or Article 11 of the San Francisco Planning Code?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

In this Initial Study, the Potentially Significant Impact designation is being used solely to identify those topics that will be addressed in detail in the Environmental Impact Report for this project and does not reflect the findings of any preliminary impact analysis. Those topics are being included in the Environmental Impact Report because there is not sufficient information available at this time on the potentially affected resources or site conditions.

Under CEQA, cultural resources<sup>23</sup> listed on, or determined to be eligible for listing on, the California Register of Historical Resources (CRHR) or a local register are those that must be given consideration in the CEQA process. The CRHR is in the California Code of Regulations Title 14, Chapter 11.5. According to this code, properties listed on or formally determined eligible for listing on the National Register of Historic Properties (NRHP) are automatically eligible for listing on the CRHR. A resource is generally considered to be historically significant under CEQA if it meets the criteria for listing on the CRHR.

A resource is considered eligible for inclusion on the CRHR, and therefore a historical resource under CEQA, if it is at least 45 years of age. To be eligible for listing to the CRHR under Criteria 1, 2, or 3, a resource must contain artifact assemblages, features, or stratigraphic relationships associated with important events, or important persons, or be exemplary of a type, period, or method of construction. To be eligible under Criterion 4, a resource need only show the *potential* to yield important information.

<sup>23</sup>Cultural resource—a generic term that may be used to refer to architectural resources, archaeological resources, and/or traditional cultural properties.

CEQA requires that the effects of a project on an archeological resource shall be taken into consideration. CEQA recognizes archeological resources as being potential instances of a “unique archaeological resource” or of a “historical resource”. However, it must first be determined if the archeological resource is a historical resource, that is, if the archeological resource meets the criteria for listing in the CRHR. An archeological resource that qualifies as a historical resource under CEQA generally, qualifies for listing under Criterion 4 of the CRHR. An archeological resource may qualify for listing under Criterion 4 when it can be demonstrated that the resource has the potential to significantly contribute to questions of scientific/historical importance. The research value of an archeological resource can only be evaluated within the context of the prehistoric/historical background of the site of the resource and within the context of prior archeological research related to the property type.

Archaeological artifacts, objects, or sites that do not meet the above criteria are not considered unique archaeological resources. Impacts on archaeological resources that are not unique and those that do not qualify for listing on the CRHR or a local register receive no further consideration under CEQA.

Paleontological resources<sup>24</sup> include fossilized remains or traces of animals, plants, and invertebrates, including their imprints, from a previous geological period. Collecting localities and the geologic formations containing those localities are also considered paleontological resources. They represent a limited, nonrenewable, and impact-sensitive scientific and educational resource.

Impacts on Native American burials are considered under PRC 15064.5(d)(1). When an initial study identifies the existence of, or the probable likelihood of, Native American human remains within the project, the lead agency is required to work with the appropriate Native Americans, as identified by the California Native American Heritage Commission (NAHC). The CEQA lead agency may develop an agreement with the appropriate Native Americans for treating or disposing of, with appropriate dignity, the human remains and any items associated with Native American burials. By implementing such an agreement, the project becomes exempt from the general prohibition on disinterring, disturbing, or removing human remains from any location other than a dedicated cemetery (Health and Safety Code Section 7050.5) and the requirements of CEQA pertaining to Native American human remains.

The SFRPD’s treatment of human remains and of associated or unassociated funerary objects discovered during any soils-disturbing activity would comply with applicable state laws. This would include immediate notification of the CCSF Coroner for discoveries in San Francisco County Natural Areas or the San

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<sup>24</sup>Paleontological resource—fossilized remains or traces of animals, plants, and invertebrates, including their imprints, from a previous geological period.

Mateo County Coroner for discoveries at Sharp Park. If the Coroner were to determine that the remains are Native American, the NAHC would be notified and would appoint a Most Likely Descendant (PRC 5097.98). The archaeologist, SFRPD, and the Most Likely Descendant would make all reasonable efforts to develop an agreement for the dignified treatment of human remains and funerary objects (CEQA Guidelines Sec. 15064.5[d]). The agreement would take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and funerary objects. State law allows 24 hours to reach agreement on these matters. If the Most Likely Descendants do not agree on the reburial method, the SFRPD would follow Section 5097.98(b) of the California PRC, which states “the landowner or his or her authorized representative shall reinter the human remains and items associated with Native American burials with appropriate dignity on the property in a location not subject to further subsurface disturbance.”

Different CEQA areas of potential effects (C-APEs) were used to determine the potential impacts on historical architectural and archaeological resources that could result from the proposed project. The C-APE used here for archaeological resources is considered preliminary. The C-APE for both categories of resources was defined for the proposed project as the surface and subsurface areas that would be directly affected by ground disturbance and project activities and is generally considered to be the boundary of each Natural Area. The architectural C-APE was established to also address nearby historical resources that could be indirectly affected. In general, the architectural C-APE includes historical resources from which the Natural Areas and their associated activities would be audible and/or visible.

To determine project impacts on the various types of cultural resources, a records search was requested in June 2008 from the California Historical Resources Information System’s Northwest Information Center (NWIC) at Sonoma State University (File No. 07-1792). The records search indicated there are various types of cultural resources within or next to six of the 31 Natural Areas. One historic building, the Golden Gate Park Conservatory (CA-SFR-37H [P-38-0037]), is adjacent to the Golden Gate Park Oak Woodland Natural Area (oak woodland, Lily Pond, and Whiskey Hill). Historic canal features associated with the Spring Valley Water Company’s water system (CA-SFR-102H [P-38-0093]) are within the Lake Merced Natural Area. The Pine Lake Natural Area is part of the historic district of Stern Grove and Pine Lake Park (P-38-4472). An archaeological site (CA-SMA-114 [P-41-116]) containing “shell midden with some bone, chert chippage<sup>25</sup>, and fire fractured rock” (Humphreys 1969) as well as some noted historic-era glass bottles is adjacent to the Sharp Park Natural Area. At the time

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<sup>25</sup>Chippage—flakes resulting from the process of human modification to lithic materials.

of its recording, it was remarked that the site was almost entirely destroyed by erosion and construction.

Through coordination with SFRPD and the CCSF Historic Preservation Division, additional cultural resources, primarily architectural in nature, were identified that were not found through the NWIC records search. This includes the Golden Gate Park Historic District, which incorporates oak woodland, Lily Pond, Whiskey Hill, and Strawberry Hill. The historic district was listed on the NRHP in October 2004 (NRIS 2008; Nelson 2004) and is therefore included on the CRHR as well. Geographic information system (GIS) data provided by the SFRPD indicate that numerous historic-aged buildings and structures are known to be immediately adjacent to almost all of the Natural Areas. The Mount Davidson Cross is one of these resources, and it is mapped as within Mount Davidson. The absence of this resource and other resources in the GIS database in the NWIC records search indicates that the resource has not yet been formally documented and submitted to the California Office of Historic Preservation. Because of its historic age (45 years or older), the Mount Davidson Cross is considered a potential historical resource. To be formally determined a historical resource, the cross would need to be recorded and evaluated for eligibility for listing on the CRHR, in consultation with the CCSF Historic Preservation Division. Mount Davidson is also the location of Works Progress Administration stairs and retaining walls (SFRPD 2006). Seven Natural Areas contain documented cultural resources (archaeological and/or architectural); no cultural resources were documented within or adjacent to any of the remaining 24 Natural Areas (NWIC File No. 07-1792).

No surveys for architectural, archaeological, or paleontological resources have been conducted for this project. All of the Natural Areas were covered by a study of pre-Spanish ecology of the Bay Area (Mayfield 1978). Several cultural resources overviews and pedestrian surveys have been conducted within 8 of the 31 Natural Areas (NWIC File No. 07-1792). The Balboa Natural Area has been partially addressed in two overviews (Mayer 1995; Olmsted and Olmsted 1979) and one linear field survey (Chavez and Ramsey 1979). Bayview Park has been completely covered by a regional overview (Hupman and Chavez 2001) and partially covered by a linear field survey (Hupman and Chavez 2004). Hawk Hill has been fully covered by an archaeological field survey (CCSF 1987). India Basin Shoreline Park has been addressed by one cultural resource overview (Gualtieri and Wall 1987), one archaeological field survey (Praetzellis et al. 1994), and one linear archaeological field survey (Hupman and Chavez 1995). Lake Merced has been partially addressed in one regional cultural resource overview (Shoup and Baker 1981), three field surveys (David Chavez and Associates 1993; Heid 1964; Willer and Albee 1957), and one subsurface testing project (Chavez 1988). Palou-Phelps has been partially covered by three linear archaeological field surveys (BioSystems Analysis 1989; Nelson et al. 2002; Sawyer et al. 2000). Pine Lake has been entirely covered by a cultural landscape report with register evaluations

that included both archaeological and architectural field surveys (Bradley and Corbett 2004) and partially covered by a separate archaeological field survey (EDAW and Ward and Associates 2006). Sharp Park has had nine overviews and surveys within and adjacent to it. The Natural Area itself has been partially covered by three archaeological field surveys (Cartier 1984; Melandry 1977; Orlins and Schwaderer 1994), two linear archaeological field surveys (Clark 2006; Moratto 1974), and one archaeological field survey with a historic study and register evaluation (Clark 2007). The rest of the Natural Areas have not been covered by any field survey or a cultural resource overview specific to those areas.

The NAHC was contacted to determine the presence of sacred sites<sup>26</sup> within or near the project areas that could qualify as historical resources or unique archaeological resources or contain human burials. The NAHC responded on June 19, 2008 that no such resources were identified by their files. However, the NAHC did provide a list of five Ohlone/Costanoan groups and individuals traditionally affiliated with the region that may be able to identify undocumented resources. SFRPD mailed consultation letters to the suggested contacts on July 16, 2008 (Appendix B). At the time of this publication, no responses had been received.

A paleontological records search was requested through the University of California Museum of Paleontology (UCMP). The records search results indicated the presence of five vertebrate localities within two miles of Sharp Park (Holroyd 2008). There are also a number of invertebrate fossil localities recorded for in San Francisco, but none within or adjacent to the Natural Areas. No known paleontological resources are within or adjacent to any of the Natural Areas (Holroyd 2008).

Architectural resources are addressed under topic a) in this Initial Study, and archaeological resources are addressed under topic b).

**a) Architectural Resources.** Several historical architectural resources not yet evaluated for CRHR- or NRHP-eligibility were identified through the abovementioned NWIC records search and correspondence with CCSF Historic Preservation Division staff. No historical architectural resources listed in Article 10 or Article 11 of the San Francisco Planning Code are within the architectural C-APE (CCSF 2003a; CCSF 2003b). One San Francisco Landmark Tree, a blue elderberry tree, is in the Bernal Hill Natural Area at the corner of Folsom Street and Bernal Heights Boulevard. The overwhelming majority of the proposed project's architectural C-APE has not been previously surveyed for historical architectural resources. As such, the presence of historical architectural resources within the architectural C-APE of the proposed project is unknown at this time.

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<sup>26</sup>Sacred site—locality of traditional significance or importance to a Native American community.

Several of the proposed general and site-specific management activities proposed in the SNRAMP could adversely affect historical architectural resources, where present. In general, these primarily include vegetation changes that may alter possible historic landscapes.

Therefore, significant impacts on historical architectural resources are possible. With implementation of Mitigation Measure M-CP-1, impacts on historical architectural resources would be reduced to less than significant. Historical architectural resources will not be discussed in the Environmental Impact Report.

**b) Archaeological Resources.** No archaeological resources were identified by the NWIC records search as within or immediately adjacent to any of the Natural Areas. However, the overwhelming majority of the archaeological C-APE has not been previously surveyed. Additionally, MEA staff have indicated that archaeological remains not on record at the NWIC, such as the 1894 Midwinter Fair and the Sharp Park Internment Camp, are known to exist within some of the Natural Areas. As such, the presence of archaeological resources within the archaeological C-APE (surface and subsurface) of the proposed project is unknown at this time. Given that the archaeological C-APE encompasses the majority of the remaining undeveloped land in the city, there is an increased possibility that intact archaeological deposits exist within the Natural Areas. Additionally, many of the Natural Areas are located in archaeologically sensitive areas (for both prehistoric and historic-era resources) based on their proximity to productive historic habitats and resource procurement locations (such as creeks, lacustrine environments, marshes, and rock outcrops). Several of the general and site-specific management activities proposed in the SNRAMP could adversely affect archaeological resources. In general, these activities primarily include ground-disturbing activities, such as tree and weed removal, livestock grazing, and activities associated with trail development and maintenance and erosion control.

The potential impacts on this topic will be analyzed in the Environmental Impact Report.

**c) Paleontological Resources and Unique Geological Formations.** The UCMF records search results indicated that there are no known paleontological resources within or adjacent to the Natural Areas, and no further studies are needed (Holroyd 2008). Many of the Natural Areas are on shallow or exposed bedrock and project activities may affect those geologic features. In general, ground-disturbing activities, such as those identified above with regard to archaeological resources, that reach bedrock could possibly impact unknown paleontological resources.

The potential impacts on this topic will be analyzed in the Environmental Impact Report.

**d) Human Remains.** The NWIC records search did not indicate that human remains have previously been encountered within the Natural Areas, nor did it indicate the presence of any modern or historic cemeteries (Humphreys 1853; GLO 1863, 1864a, 1864b; San Mateo County Chamber of Commerce 1931; USACE 1942a 1942b; USGS 1896, 1899, 1915a, 1915b; US Surveyor General 1856, 1857, 1859, 1864, 1868, 1871, 1886). The overwhelming majority of the archaeological C-APE has not been previously surveyed for archaeological resources that may include human remains. As such, the presence of human remains within the archaeological C-APE of the proposed project is unknown at this time. Given that the archaeological C-APE encompasses the majority of the remaining undeveloped land in the City, there is a possibility that intact burials exist within the Natural Areas. As with the archaeological resources discussed above, the location of many of the Natural Areas make them sensitive for prehistoric deposits, including human burials. Ground-disturbing activities, such as those identified above under archaeological resources, would have the possibility to impact burials as well.

The potential impacts on this topic will be analyzed in the Environmental Impact Report.

E.5 TRANSPORTATION AND CIRCULATION

<u>Topics:</u>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>5. TRANSPORTATION AND CIRCULATION— Would the project:</b>					
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume-to-capacity ratio on roads, or congestion at intersections)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways (unless it is practical to achieve the standard through increased use of alternative transportation modes)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels, obstructions to flight, or a change in location, that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Result in inadequate parking capacity that could not be accommodated by alternative solutions?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., conflict with policies promoting bus turnouts, bicycle racks, etc.), or cause a substantial increase in transit demand which cannot be accommodated by existing or proposed transit capacity or alternative travel modes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**a, b)** While vehicles would be used during project implementation, the frequency of road trips by those vehicles would be minimal. Workers for the proposed project would either be the ten Natural Areas Program gardeners or periodic groups of volunteers of up to 50 people, with an average group size closer to 10 people. It is assumed that volunteers reside in the San Francisco Bay Area. Also the number and frequency of volunteer groups is expected to be similar to current levels. While visitor numbers may increase, most of the visitors would be locals who would walk or bike to the Natural Areas. As a result, the project would not exceed any level of service standard and would have less than significant impacts on traffic load and capacity of the street system.

These topics will not be discussed in the Environmental Impact Report.

c) The project sites are not in the vicinity of any airports, and the proposed project does not include any activities that would affect air traffic patterns, so there would be no impacts on air traffic.

This topic will not be discussed in the Environmental Impact Report.

d) The proposed project involves the long-term management of the Natural Areas. The proposed project does not include road designs, and therefore the increase in hazards due to design features is not applicable to this project.

This topic will not be discussed in the Environmental Impact Report.

e) Implementation of the proposed project would be within the existing Natural Areas and would not disrupt the access to any adjacent facility or residence. Therefore, no impact on emergency access would result from the proposed project.

This topic will not be discussed in the Environmental Impact Report.

f) The minimal number of trucks or other motor vehicles that would be used during the implementation of the proposed project would either park within the boundaries of the Natural Areas or in available parking spaces in the vicinity. However, the number of trucks or other vehicles that would be used is negligible (typically no more than one vehicle per day at a given Natural Area), and one public parking space at a given Natural Area may be used for a short duration during the day. The demand for parking would increase on those days when volunteer groups are involved in management activities. Impacts on parking as a result of the proposed project would be less than significant.

This topic will not be discussed in the Environmental Impact Report.

g) The proposed project does not include any activities that would affect alternative transportation facilities or use, so it would have no impacts on alternative transportation.

This topic will not be discussed in the Environmental Impact Report.

E.6 NOISE

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>6. NOISE—Would the project:</b>					
a) Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan area, or, where such a plan has not been adopted, in an area within two miles of a public airport or public use airport, would the project expose people residing or working in the area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project located in the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Be substantially affected by existing noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a, d) The project would not generate noise that would exceed standards established in the local general plan or noise ordinance or applicable standards of other agencies. Equipment anticipated to be used during the project includes chain saws, power hedge trimmers, power pruners, gas-powered water pumps, augers, power drills, and cherry pickers<sup>27</sup>. Vehicles would primarily be pickup trucks. During project implementation, equipment operation associated with the management of the Natural Areas, such as weeding and tree removal, would temporarily increase noise levels in the immediate vicinity of the management areas. Although most of the Natural Areas are located within residential districts, the project's implementation would not require extensive use of heavy equipment. Individual pieces of equipment used would comply with the noise limits of the San Francisco Noise Ordinance (Article 29 of the San Francisco Police Code) for the Natural Areas within San Francisco and the San Mateo County noise ordinance for management activities in Sharp Park. Further, potential noise impacts are expected to be discontinuous and of very short

<sup>27</sup>Cherry picker—a maneuverable vertical boom with an open bucket or cage at the end from which a worker can perform aerial work such as pruning trees or repairing electrical lines.

duration during the day time. As a result, the impacts associated with noise exposure and temporary ambient noise<sup>28</sup> levels would be less than significant.

These topics will not be discussed in the Environmental Impact Report.

**b)** The project would not add to the permanent groundborne vibration resulting from the regular traffic in the vicinity of the management areas. Temporary use of the anticipated mechanical equipment would not result in significant groundborne vibration. Because trees would typically be removed limb by limb, tree removal would not cause groundborne vibrations. Additionally, trees would be removed within restricted areas, away from the visitors and nearby residents. Therefore, the project would not result in groundborne vibration or noise impacts.

This topic will not be discussed in the Environmental Impact Report.

**c)** Using mechanical equipment would increase noise levels, but this noise would be temporary and discontinuous, associated with tree removal, trail creation, and invasive vegetation removal. Because the noise levels are expected to be low and the project would be required to comply with the San Francisco Noise Ordinance (Article 29 of the San Francisco Police Code), the project would not result in substantial permanent increases in ambient noise levels.

These topics will not be discussed in the Environmental Impact Report.

**e, f)** There would be no impact on noise levels around an airport/airstrip because there are no airports/airstrips in the vicinity of the project site.

These topics will not be discussed in the Environmental Impact Report.

**g)** The project sites are within urbanized areas of San Francisco and Pacifica. The management of the Natural Areas would not be affected by the existing noise levels.

This topic will not be discussed in the Environmental Impact Report.

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<sup>28</sup>Ambient noise—the background noise in an area or environment, being a composite of sounds from many sources near and far.

E.7 AIR QUALITY

<u>Topics:</u>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>7. AIR QUALITY</b>					
Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. <b>Would the project:</b>					
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal, state, or regional ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the state goal of reducing greenhouse gas emissions in California to 1990 levels by 2020, as set forth by the timetable established in AB 32 (California Global Warming Solutions Act of 2006), such that the project's greenhouse gas emissions would result in a substantial contribution to global climate change or conflict with the San Francisco Local Greenhouse Gas Ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) The project involves management of the Natural Areas and includes reintroduction of sensitive species, tree removal in conformance with forestry statements, and erosion-control measures. None of those activities would generate air pollutants that would conflict with applicable air quality plans or standards and conflict with or obstruct implementation of current air quality plans. Therefore, no impacts related to conflicting with or obstructing implementation of the applicable air quality plan would result from the project.

This topic is not discussed in the Environmental Impact Report.

b) The proposed project is within the San Francisco Bay Area Air Basin (SFBAB) and is under the jurisdiction of the Bay Area Air Quality Management District (BAAQMD). Within the SFBAB, ambient air<sup>29</sup> quality standards for ozone (O<sub>3</sub>), carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), inhalable

<sup>29</sup>Ambient air—outside air; any portion of the atmosphere not confined by walls and a roof.

and fine particulate matter<sup>30</sup> (PM<sub>10</sub> and PM<sub>2.5</sub>), and lead (Pb) have been set forth by both the State of California and the federal government. California has also set standards for sulfate and visibility. Because SFBAB is designated nonattainment for ozone, PM<sub>10</sub>, and PM<sub>2.5</sub>, the BAAQMD developed the 2000 Clean Air Plan and adopted the 2005 Ozone Strategy, in January 2006, as the air quality management plan for achieving the state ozone standards. No formal air quality plans are required for the state PM<sub>10</sub> or PM<sub>2.5</sub> standards, but the BAAQMD has identified an implementation schedule for new rules and regulations to reduce particulate matter emissions.

### **Long-Term (Operational) Emissions**

Long-term air emissions impacts are typically associated with a change in permanent use of the project site by on-site stationary sources and off-site mobile sources that substantially increase vehicle trip emissions. There are no stationary sources associated with the proposed project, and potential pollutant emissions resulting from motor vehicles accessing the project sites would be similar to what occurs currently as part of ongoing management activities and visitors to the Natural Areas. As discussed in the transportation and circulation section of this document, visitor numbers may increase, but most visitors would be local residents who walk or bike to the Natural Areas; as such, vehicle trips are not expected to increase. Therefore, no additional long-term emissions would result from implementing the proposed project, and long-term emissions impacts would be less than significant.

### **Short-Term (Implementation) Emissions**

Air pollutant emissions associated with implementation of the proposed project would occur over the short term. Management of the Natural Areas could generate exhaust emissions that would affect local air quality and emit greenhouse gases (GHGs).

Management activities could generate combustion emissions from use of chain saws, power hedge trimmers, power pruners, gas-powered water pumps, augers, power drills, cherry pickers, brush blades, string trimmers, mowers, and motor vehicles. Exhaust emissions during implementation would vary daily as management activity levels change. The use of motorized equipment would result in localized exhaust and GHG emissions; however, those equipment types are currently used, and levels of use are expected to be similar to current levels. Due to this and the limited extent of management activities, the projected short-term emissions of criteria pollutants as a result of project activities are expected to be below emissions thresholds established by the BAAQMD, resulting in less than significant impacts. Similarly, because GHG emissions from management activities would be similar to current levels, emissions of GHGs from the project would have less than significant impacts.

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<sup>30</sup>Particulate matter—tiny solid or liquid particles, generally soot and aerosols.

This topic is not discussed in the Environmental Impact Report.

c) Implementation of the project's components would result in minimal emissions (motor vehicles and equipment used during the management activities) and particulate matter (from fugitive dust). The project's activities in the San Francisco Natural Areas could cause a temporary increase in particulate matter emissions associated with the management activities, such as removal of trees and other invasive species and the use of light equipment and motor vehicles. Emissions associated with the management activities would vary, depending on the level of activity and specific operation. Because proposed management activities would be similar to current activities and, due to the limited nature of those activities, emissions of criteria pollutants would have less than significant impacts. The San Francisco Board of Supervisors approved a series of amendments to the San Francisco Building and Health Codes, generally referred hereto as the Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008). The amendments would reduce the quantity of dust generated during site preparation, demolition, and construction in order to protect the health of the general public and of on-site workers and to minimize public nuisance complaints. It specifies that construction managers comply with specified dust control measures during site preparation, demolition, or other construction within San Francisco that could create dust or expose or disturb more than 10 cubic yards or 500 square feet of soil. Examples of dust control are wetting down areas near soil improvement operations and limiting the areas subject to excavation and grading at any one time. The proposed project would comply with this ordinance. Therefore, impacts of fugitive dust emissions that would result from management activities at the San Francisco Natural Areas would be less than significant.

Fugitive dust emissions in Sharp Park would be similar to those in the San Francisco Natural Areas and could cause a temporary increase in particulate matter emissions. To reduce the impact of particulate matter emissions during management activities, the SFRPD would implement, as applicable and depending on the level of activity, the BAAQMD recommendations, as detailed in Mitigation Measures M-AQ-1.

Additionally, to further control exhaust in all Natural Areas, the SFRPD would implement M-AQ-2. Compliance with the San Francisco Dust Control Ordinance and implementation of the Mitigation Measures M-AQ-1 and M-AQ-2 would reduce impacts of particulate matter and exhaust to less than significant levels.

This topic is not discussed in the Environmental Impact Report.

d) Land uses such as schools, children's day care centers, hospitals, and convalescent homes are considered to be more sensitive to poor air quality than the general public because the population groups associated with these places

have increased susceptibility to respiratory distress. Persons engaged in strenuous work or exercise also have increased sensitivity to poor air quality. Residential areas are considered more sensitive to air quality conditions than commercial and industrial areas because people generally spend longer periods of time at their residences, resulting in greater exposure to ambient air quality conditions. Recreational areas are also considered sensitive receptors, due to the greater exposure of users to ambient air quality conditions and because the presence of pollution detracts from the user's recreational experience. The project would be within and/or adjacent to residential, school, and recreational areas, as well as commercial areas. The SFRPD would comply with Section 93115, Title 17, California Code of Regulations, Airborne Toxic Control Measure for Stationary Compression Ignition Engines, which specifies fuel and fuel additive requirements, emission standards for operating any stationary, diesel-fueled, compression-ignition engines, and operation restrictions within 500 feet of school grounds when school is in session.

Fugitive dust<sup>31</sup> emissions are associated with land clearing, trail creation, and tree removal. Dust generated daily during implementation would vary substantially, depending on the level of activity, the specific operations, and weather conditions. Nearby sensitive receptors<sup>32</sup> and on-site workers may be exposed on a limited basis to blowing dust, depending on the prevailing wind. The BAAQMD emphasizes implementing effective and comprehensive control measures rather than detailed quantification of construction emissions. It recommends implementing all feasible control measures based on the size of the construction area and nature of activities that would occur.

Where applicable, the project proponents would comply with the Construction Dust Control Ordinance. For Sharp Park, the SFRPD would implement BAAQMD recommendations, outlined in Mitigation Measure M-AQ-1 during management activities, such as land clearing, trail creation, and tree removal. Further, the SFRPD would implement Mitigation Measure M-AQ-2 to limit exhaust emissions during applicable management activities in all the Natural Areas. By implementing these mitigation measures, fugitive dust emissions from management activities would be reduced to less than significant.

This topic will not be discussed in the Environmental Impact Report.

e) Organic material in soil can decompose through anaerobic processes<sup>33</sup> and generate methane and hydrogen sulfide gases, which can then be released into

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<sup>31</sup>Fugitive dust—fugitive emissions generally refer to those emissions that are released to the atmosphere by some means other than through a stack or tailpipe.

<sup>32</sup>Sensitive receptors—people or institutions with people that are particularly susceptible to illness from environmental pollution, such as the elderly, very young children, people already weakened by illness (e.g., asthmatics), and persons engaged in strenuous exercise.

<sup>33</sup>Anaerobic processes—a process which only occurs in the absence of molecular oxygen.

the environment when the soil is exposed. Soil excavation associated with the management activities would be minimal and temporary, and therefore would not generate odors that would affect a substantial number of people. Equipment exhaust could occasionally emit odors attributed to gasoline combustion, but these odors would not be significant. Implementation of Mitigation Measure M-AQ-2 would further reduce the magnitude of this less than significant impact.

This topic will not be discussed in the Environmental Impact Report.

f) Gases that trap heat in the atmosphere are referred to as GHGs because they capture heat radiated from the sun as it is reflected back into the atmosphere, much like a greenhouse does. The accumulation of GHGs has been implicated as a driving force for global climate change. Definitions of climate change vary between and across regulatory authorities and the scientific community, but in general can be described as the changing of the earth's climate caused by natural fluctuations and anthropogenic activities that alter the composition of the global atmosphere.

Individual projects contribute to the cumulative effects of climate change by emitting GHGs during demolition, construction, and operational phases. The principal GHGs are carbon dioxide, methane, nitrous oxide, ozone, and water vapor. (Ozone also contributes to the retention of heat, though it is not directly emitted but is formed from other gases in the troposphere, the lowest level of the earth's atmosphere.) While the presence of the primary GHGs in the atmosphere are naturally occurring, carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and nitrous oxide (N<sub>2</sub>O) are largely emitted from human activities, accelerating the rate at which these compounds occur within earth's atmosphere. Carbon dioxide is the "reference gas" for climate change, meaning that emissions of GHGs are typically reported in "carbon dioxide-equivalent" measures. Emissions of carbon dioxide are largely by-products of fossil fuel combustion, whereas methane results from off-gassing associated with agricultural practices and landfills. Other GHGs, with much greater heat-absorption potential than carbon dioxide, include hydro fluorocarbons, perfluorocarbons, and sulfur hexafluoride, and are generated in certain industrial processes. There is international scientific consensus that human-caused increases in GHGs have contributed to global warming and will continue to do so, although there is uncertainty concerning the magnitude and rate of the warming. Potential global warming impacts in California may include loss in snow pack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years.<sup>34</sup> Secondary effects are likely to include a global rise in sea level, impacts on agriculture, changes in disease vectors, and changes in habitat and biodiversity.

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<sup>34</sup>California Air Resources Board (ARB), 2006a. Climate Change website (<http://www.arb.ca.gov/cc/120106workshop/intropres12106.pdf>) accessed December 4, 2007.

The California Energy Commission (CEC) estimated that in 2004 California produced 500 million gross metric tons (about 550 million US tons) of carbon dioxide-equivalent GHG emissions.<sup>35</sup> The CEC found that transportation is the source of 38 percent of the state's GHG emissions, followed by electricity generation (both in-state and out-of-state) at 23 percent, and industrial sources at 13 percent.<sup>36</sup> In the Bay Area, fossil fuel consumption in the transportation sector (on-road motor vehicles, off-highway mobile sources, and aircraft) is the single largest source of GHG emissions, accounting for just over half of the 85 million tons of GHG emissions in 2002 in the Bay Area. Industrial and commercial sources were the second largest contributors of GHG emissions, with about one-fourth of total emissions. Domestic sources (e.g., home water heaters and furnaces) account for about 11 percent of the Bay Area's GHG emissions, followed by power plants at 7 percent. Oil refining accounts for approximately 6 percent of the total Bay Area GHG emissions.<sup>37</sup>

### Statewide Actions

In 2005, in recognition of California's vulnerability to the effects of climate change, Governor Schwarzenegger established Executive Order S-3-05, which sets forth a series of target dates by which statewide emissions of GHG would be progressively reduced, as follows: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels; and by 2050, reduce GHG emissions to 80 percent below 1990 levels.<sup>38</sup>

California passed the California Global Warming Solutions Act of 2006 (Assembly Bill No. 32; California Health and Safety Code Division 25.5, Sections 38500, et seq., or AB 32), which requires the California Air Resources Board (CARB) to design and implement emission limits, regulations, and other measures, such that feasible and cost-effective statewide GHG emissions are reduced to 1990 levels by 2020 (representing a 25 percent reduction in emissions).

AB 32 establishes a timetable for the CARB to adopt emission limits, rules, and regulations designed to achieve the intent of the act. CARB staff is preparing a scoping plan to meet the 2020 GHG reduction limits outlined in AB 32. In order to meet these goals, California must reduce its GHG by 30 percent below

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<sup>35</sup>Because of the differential heat absorption potential of various GHGs, GHG emissions are frequently measured in "carbon dioxide-equivalents," which present a weighted average based on each gas's heat absorption (or "global warming") potential.

<sup>36</sup>California Energy Commission, *Inventory of California Greenhouse Gas Emissions and Sinks: 1990 to 2004 - Final Staff Report*, publication # CEC-600-2006-013-SF, December 22, 2006; and January 23, 2007 update to that report. Available on the internet at: <http://www.arb.ca.gov/cc/ccei/emsinv/emsinv.htm>.

<sup>37</sup>BAAQMD, *Source Inventory of Bay Area Greenhouse Gas Emissions: Base Year 2002*, November 2006. Available on the internet at: [http://www.baaqmd.gov/pln/ghg\\_emission\\_inventory.pdf](http://www.baaqmd.gov/pln/ghg_emission_inventory.pdf).

<sup>38</sup>California Air Resources Board (CARB), *Climate Change Draft Scoping Plan: A Framework for Change*, June 2008 Discussion Draft. Available on the internet at: <http://www.climatechange.ca.gov/index.php>. Accessed July 29, 2008.

projected 2020 business as usual emissions levels, or about 10 percent from 2006's levels. In June 2008, CARB released its Draft Scoping Plan, which estimates a reduction of 169 million metric tons of CO<sub>2</sub>-equivalents (MMTCO<sub>2</sub>-eq). Approximately one-third of the emissions reductions strategies fall within the transportation sector and include the following: California Light-Duty Vehicle GHG standards, the Low Carbon Fuel Standard, Heavy-Duty Vehicle GHG emission reductions and energy efficiency, and medium and heavy-duty vehicle hybridization, high speed rail, and efficiency improvements in goods movement. These measures are expected to reduce GHG emissions by 60.2 MMTCO<sub>2</sub>-eq. Emissions from the electricity sector are expected to reduce another 49.7 MMTCO<sub>2</sub>-eq. Reductions from the electricity sector include building and appliance energy efficiency and conservation, increased combined heat and power, solar water heating (AB 1470), the renewable energy portfolio standard (33 percent renewable energy by 2020), and the existing million solar roofs program. Other reductions are expected from industrial sources, agriculture, forestry, recycling and waste, water, and emissions reductions from cap-and-trade programs. Local government actions and regional GHG targets are also expected to yield a reduction of 2 MMTCO<sub>2</sub>-eq.<sup>39</sup> Measures that could become effective during implementation of the SNRAMP pertain to construction-related equipment and sustainable forest practices. Some proposed measures will require new legislation to implement, some will require subsidies, some have already been developed, and some will require additional effort to evaluate and quantify. Additionally, some emissions reductions strategies may require their own environmental review under CEQA or the National Environmental Policy Act. Applicable measures that are ultimately adopted will become effective during implementation of proposed project and the proposed project could be subject to these requirements, depending on the proposed project's timeline.

### **Local Actions**

San Francisco has a history of environmental protection policies and programs aimed at improving the quality of life for residents and reducing impacts on the environment. The following plans, policies, and legislation demonstrate San Francisco's continued commitment to environmental protection.

#### **Transit First Policy**

In 1973, San Francisco instituted the Transit First Policy, which added Section 16.102 to the City Charter with the goal of reducing the City's reliance on freeways and meeting transportation needs by emphasizing mass transportation. The Transit First Policy gives priority to public transit investments, adopts street capacity and parking policies to discourage increased automobile traffic, and encourages the use of transit, bicycling, and walking rather than use of single-occupant vehicles.

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<sup>39</sup>Ibid.

### **San Francisco Sustainability Plan**

In July 1997 the Board of Supervisors approved the Sustainability Plan for the City of San Francisco, establishing sustainable development as a fundamental goal of municipal public policy.

### **The Electricity Resource Plan (Revised December 2002)**

San Francisco adopted the Electricity Resource Plan to help address growing environmental health concerns in San Francisco's southeast community, home of two power plants. The plan presents a framework for ensuring a reliable, affordable, and renewable source of energy for the future of San Francisco.

### **The Climate Action Plan for San Francisco**

In February 2002, the San Francisco Board of Supervisors passed the Greenhouse Gas Emissions Reduction Resolution (Number 158-02), committing the City and County of San Francisco to a GHG emissions reduction goal of 20 percent below 1990 levels by the year 2012. In September 2004, the San Francisco Department of the Environment and the Public Utilities Commission published the Climate Action Plan for San Francisco: Local Actions to Reduce Greenhouse Gas Emissions.<sup>40</sup> The Climate Action Plan provides the context of climate change in San Francisco and examines strategies to meet the 20 percent GHG reduction target. Although the Board of Supervisors has not formally committed the City to perform the actions addressed in the plan, and many of the actions require further development and commitment of resources, the plan serves as a blueprint for GHG emission reductions, and several actions have been implemented or are now in progress.

### **San Francisco Municipal Transportation Agency's Zero Emissions 2020 Plan**

The SFMTA's Zero Emissions 2020 plan focuses on the purchase of cleaner transit buses, including hybrid diesel-electric buses. Under this plan hybrid buses will replace the oldest diesel buses, some dating back to 1988. The hybrid buses emit 95 percent less particle matter (or soot) than the buses they replace, they produce 40 percent less oxides of nitrogen (NOx), and they reduce GHG by 30 percent.

### **LEED Silver for Municipal Buildings**

In 2004, the City amended Chapter 7 of the Environment code, requiring all new municipal construction and major renovation projects to achieve LEED Silver Certification from the US Green Building Council.

### **Greenhouse Gas Reduction Ordinance**

In May 2008, San Francisco adopted an ordinance amending the San Francisco Environment Code to establish City GHG emission targets and departmental

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<sup>40</sup>San Francisco Department of the Environment and San Francisco Public Utilities Commission, *Climate Action Plan for San Francisco*, Local Actions to Reduce Greenhouse Emissions, September 2004.

action plans, to authorize the Department of the Environment to coordinate efforts to meet these targets and to make environmental findings. The ordinance establishes the following GHG reduction limits and the target dates to achieve them:

- Determine 1990 City GHG emissions by 2008, the baseline level with reference to which target reductions are set;
- Reduce GHG by 25 percent below 1990 levels by 2017;
- Reduce GHG by 40 percent below 1990 levels by 2025; and
- Reduce GHG by 80 percent below 1990 levels by 2050.

The ordinance also specifies requirements for City departments to prepare departmental Climate Action Plans and report to the Department of the Environment GHG emissions associated with the department's activities and activities that they regulate and to prepare recommendations to reduce emissions. As part of this, the San Francisco Planning Department is required to: (1) update and amend the City's applicable General Plan elements to include the emissions reduction limits set forth in this ordinance and policies to achieve those targets; (2) consider a project's impact on the City's GHG reduction limits specified in this ordinance as part of its review under CEQA; and (3) work with other City departments to enhance the "transit first" policy to encourage a shift to sustainable modes of transportation thereby reducing emissions and helping to achieve the targets set forth by this ordinance.

#### **GoSolarSF**

On July 1, 2008, the San Francisco Public Utilities Commission (SFPUC) launched its "GoSolarSF" program to San Francisco's businesses and residents, offering incentives in the form of a rebate program that could pay for approximately half the cost of installation of a solar power system, and more to those qualifying as low-income residents.

#### **City of San Francisco's Green Building Ordinance**

On August 4, 2008, Mayor Gavin Newsom signed into law San Francisco's Green Building Ordinance for newly constructed residential and commercial buildings and renovations to existing buildings. The ordinance specifically requires newly constructed commercial buildings over 5,000 square feet, residential buildings over 75 feet in height, and renovations on buildings over 25,000 sq. ft. to be subject to an unprecedented level of LEED and green building certifications, which makes San Francisco the city with the most stringent green building requirements in the nation. Cumulative benefits of this ordinance include reducing CO<sub>2</sub> emissions by 60,000 tons, saving 220,000 megawatt hours of power, saving 100 million gallons of drinking water, reducing wastewater and stormwater by 90 million gallons of water, reducing construction and demolition waste by 700 million pounds, increasing the valuations of recycled materials by

\$200 million, reducing automobile trips by 540,000, and increasing green power generation by 37,000 megawatt hours.<sup>41</sup>

The Green Building Ordinance also continues San Francisco's efforts to reduce its GHG emissions to 20 percent below 1990 levels by 2012, a goal outlined in the City's 2004 Climate Action Plan. In addition, by reducing emissions, this ordinance also furthers California's efforts to reduce GHG emissions statewide, as mandated by the California Global Warming Solutions Act of 2006.

The City has also passed ordinances to reduce waste from retail and commercial operations. Ordinance 295-06, the Food Waste Reduction Ordinance, prohibits the use of polystyrene foam disposable food service ware and requires biodegradable/compostable or recyclable food service ware by restaurants, retail food vendors, City Departments, and City contractors. Ordinance 81-07, the Plastic Bag Reduction Ordinance, requires stores in the City and County of San Francisco to use compostable plastic, recyclable paper, and reusable checkout bags.

The San Francisco Planning Department and Department of Building Inspection have also developed a streamlining process for Solar Photovoltaic (PV) Permits and priority permitting mechanisms for projects pursuing LEED Gold Certification.

The City's Planning Code reflects the latest smart growth policies and includes electric vehicle refueling stations in City parking garages, bicycle storage facilities for commercial and office buildings, and zoning that is supportive of high density mixed-use infill development. The City's more recent area plans, such as Rincon Hill and the Market and Octavia Area Plan, provide transit-oriented development policies. At the same time there is also a community-wide focus on ensuring San Francisco's neighborhoods as "livable," including the Better Streets Plan that would improve streetscape policies throughout the city, the Transit Effectiveness Plan, that aims to improve transit service, and the Bicycle Plan, all of which promote alternative transportation options. The CCSF also provides incentives to its employees to use alternative commute modes, and the CCSF recently introduced legislation that would require almost all employers to have comparable programs.

Each of the policies and ordinances discussed above include measures that would decrease the amount of GHG emitted into the atmosphere and decrease San Francisco's overall contribution to climate change.

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<sup>41</sup>These findings are contained within the final Green Building Ordinance, signed by the Mayor on August 4, 2008.

## Impacts

As previously discussed, implementing the SNRAMP would generate GHGs from the use of chainsaws, power hedge trimmers, power pruners, gas-powered water pumps, augers, power drills, cherry pickers, brush blades, string trimmers, mowers, and motor vehicles. However, the SFRPD uses these equipment types, and future levels of use for managing the Natural Areas are expected to be similar to current levels. Therefore, GHG emissions from implementing the SNRAMP would be relatively similar to current levels.

Similarly, while visitor use is generally expected to increase slightly from management activities identified in the SNRAMP, most visitors would be local residents who would walk or bike to the Natural Areas. Therefore, GHGs from vehicles used to access the Natural Areas would be relatively similar to current levels. As such, impacts of GHG emissions generated by implementing the management activities and the increased number of visitors would be less than significant.

Urban trees can help mitigate climate change by sequestering atmospheric carbon in tissue and by reducing energy use in buildings, consequently reducing carbon dioxide emissions from fossil fuel-based power plants. However, net carbon sequestration<sup>42</sup> can be negative if carbon emissions from decomposition is greater than the amount sequestered by healthy trees. There are an estimated 64,000 trees within the project area. The project includes the removal and replacement of approximately 3,448 trees, 97 percent of which are within the MA-1<sup>43</sup> and MA-2<sup>44</sup> urban forests. Trees would be removed to promote forest health and would focus on dead or dying trees, trees with disease or insect infestations, storm-damaged or hazardous trees, and trees whose growth is suppressed by overcrowding. Large tree trunks may be left on-site if they provide habitat value, or they may be used for recreation or maintenance within the Natural Area. Unless it can be used to create wildlife habitat, all large woody debris generated by the Natural Areas Program would be composted in Golden Gate Park. Although old large trees are good at storing carbon, they are not as effective as young trees at taking up carbon (Oxarart et al. 2007). Replacing dead, dying, and diseased trees that have limited capability to sequester carbon with young saplings that have long-term carbon sequestration capabilities would result in a net GHG benefit.

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

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<sup>42</sup>Carbon sequestration—the removal and storage of carbon from the atmosphere in carbon sinks (such as oceans, forests, and soils) through physical or biological processes, such as photosynthesis.

<sup>43</sup>MA-1 represents the priority areas for conservation and management activities.

<sup>44</sup>Areas designated MA-2 are comparatively more resilient to human disturbance than MA-1 areas.

long-term goal in MA-1 and MA-2 is to slowly convert those areas to native scrub, grassland habitats, or oak woodlands. According to an urban forest assessment for San Francisco, the total number of trees in San Francisco is 669,000. San Francisco trees and shrubs remove an estimated 260 tons of air pollution (CO, NO<sub>2</sub>, O<sub>3</sub>, PM<sub>10</sub>, SO<sub>2</sub>) per year. San Francisco trees sequester 5,200 tons of carbon dioxide annually, which is equivalent to the annual amount of carbon emitted by 3,100 cars (USDA 2007). San Francisco trees are estimated to store 196,000 tons of carbon, or the annual amount of carbon emitted by 118,000 cars (USDA 2007).

As trees die and decay, they release much of the stored carbon to the atmosphere. Thus, carbon storage is an indication of the amount of carbon that can be lost if trees are allowed to die and decompose. Of all the species in San Francisco, eucalyptus trees store and sequester the most carbon (approximately 24.4 percent of the total carbon stored and 16.3 percent of all sequestered carbon). Trees removed in the Natural Areas in San Francisco would be replaced on a one-to-one ratio, although not necessarily in the same location. Eucalyptus trees would be replaced with native trees. Although the net effect on carbon sequestration capacity is unknown for the proposed replacement of mature eucalyptus with native saplings, replacing dying trees with healthy trees typically enhances the carbon sequestration process. In fact, one of the urban forest management strategies to help improve air quality is to increase the number of healthy trees. Further, among mitigation measures recommended by the Intergovernmental Panel on Climate Change is forest management and in particular tree species selection that sequester the most carbon (IPCC 2007). As such, tree replacement is expected to result in a net increase in the amount of carbon sequestered within the Natural Areas. The total number of trees would not change within the Natural Areas of San Francisco and the amount of carbon sequestered would increase in the long term from replacing dead, dying, or diseased trees. Therefore, the project would not conflict with San Francisco's Greenhouse Gas Ordinance, which would result in less than significant individual and cumulative impacts from GHG emissions and the associated carbon sequestration impacts.

Trees removed in Sharp Park would be replaced with native grassland and scrub species. According to a study presented at the American Geophysical Union's meeting, grasslands above 50 degrees latitude reflects more sun than forest canopies, thereby keeping temperatures lower by an average of 0.8 degree Celsius. However, in the tropics, forests cool the planet by an average of 0.7 degree Celsius (Jha 2006). Research studies have concluded that grassland and scrub habitat could act as a significant carbon sink (Hu 2001; Conant 2001). Therefore, replacing the trees to be removed in Sharp Park with grassland and scrub habitat would not result in a substantial increase in GHG emissions, and impacts from GHG emissions would be less than significant.

The project would not conflict with California's goal of reducing GHG emissions set forth by the timetable established in AB32. Additionally, the project would not conflict with San Francisco's Climate Action Plan such that it would impede implementation of the local GHG reduction goals established by San Francisco's Greenhouse Gas Reduction Ordinance.

This topic will not be discussed in the Environmental Impact Report.

E.8 WIND AND SHADOW

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>8. WIND AND SHADOW—Would the project:</b>					
a) Alter wind in a manner that substantially affects public areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) The project does not propose any aboveground structures that would alter wind. The project involves the preservation and restoration of the existing Natural Areas. While the CCSF has not established wind standards for recreational areas and open spaces, such as the Natural Areas, the San Francisco Planning Code has established a hazard level of 26 miles per hour for a single hour of the year for certain downtown areas. A total of 18,424 trees would be incrementally removed as part of the management activities. Of these, approximately 15,000 trees would be removed from Sharp Park. Tree removal of wind-toughened edge trees<sup>45</sup> could expose the interior of a stand of trees to unusual wind conditions. Trees removed within San Francisco would be replaced at a one-to-one ratio, although not necessarily in the same location. Within Sharp Park, trees would be removed in the upper canyon in an inaccessible area and would be replaced with native grassland and scrub species. Trees would be removed in accordance with the Urban Forestry Statements in Appendix F of the SNRAMP. In general, removal within the Natural Areas are planned to take individuals or very small groups of trees within existing forest and scrub habitats to avoid altering the wind conditions. As such, tree removal would not include wind-toughened edge trees and would not result in increased wind hazards or expose trees within a stand to high winds. Therefore, the potential wind hazard or windthrow<sup>46</sup> that would result from the project is expected to be less than significant.

This topic will not be discussed in the Environmental Impact Report.

b) Because the project does not propose any aboveground structures that would create new shadows, it would not result in shadow impacts.

This topic will not be discussed in the Environmental Impact Report.

<sup>45</sup>Wind-toughened edge trees—trees in a stand that have become tough or resistant to the wind.

<sup>46</sup>Windthrow—the effects of wind on a stand of trees.

E.9 RECREATION

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>9. RECREATION—Would the project:</b>					
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Physically degrade existing recreational resources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

In this Initial Study, the Potentially Significant Impact designation is being used solely to identify those topics that will be addressed in detail in the Environmental Impact Report for this project and does not reflect the findings of any preliminary impact analysis. Those topics are being included in the Environmental Impact Report because there is not sufficient information available at this time on the potentially affected resources or site conditions.

Recreation in the Natural Areas is generally considered to be passive recreation, that which requires no developed sites or facilities. Types of passive recreation include walking, hiking, running, dog walking, and nature watching. Almost all of the Natural Areas include trails, and most provide scenic views of San Francisco. Walking and biking trails were identified as one of the most important recreation facility needs for San Francisco residents according to the 2004 SFRPD Recreation Assessment (SFRPD 2004). Of the individuals surveyed for that assessment, 67 percent participated in running or walking, the highest percentage for any of the 26 activities identified in the survey. Other activities that San Francisco residents participate in included visiting nature areas (61 percent, second on the activities list), bicycling (38 percent, fifth on the activities list), volunteering (22 percent, tenth on the activities list), and dog walking (20 percent, twelfth on the activities list).

Because trails and trail-related activities are a main component of recreation in Natural Areas, the SNRAMP provides recommendations to develop site-stewardship and recreational uses compatible with natural resource protection. Two of the major actions proposed by the SNRAMP that would affect recreation are the modification and closure of trails and the reduction in space allotted for DPAs.

a) The project has the potential to increase the use of existing neighborhood and regional parks. According to the SFRPD Recreation Assessment, the condition of many SFRPD facilities is deteriorating, and the recreation facilities most important to residents are walking and biking trails (SFRPD 2004). The SNRAMP calls for the closure of 54,411 feet (10.31 miles) of trail. Trails could be closed because they are unsafe, because they are social trails, to protect sensitive species or habitat, or to prevent soil erosion. While some new trails would be created, the proposed project would cause a net decrease of 48,514 feet (9.2 miles), or 23.0 percent, of the trails within the Natural Areas. However, primary trails would be improved to provide a more manageable trail system with greater access and easier navigation through the parks. The Natural Areas could experience increased use because of the improved trail system.

The project calls for closing 19.3 acres (20.3 percent) of DPAs within the Natural Areas (Recommendations GR-8a, GR-8b, and GR-8c), which accounts for 16.4 percent of the total acres of SFRPD-maintained DPAs. Under the SNRAMP, the SFRPD would remove the Lake Merced DPA and would decrease the area of two DPAs, one on Bernal Hill and the other in McLaren Park. At least 2.5 acres of the proposed closures are largely inaccessible due to slopes of between 45 and 90 degrees. The possibility for the DPAs in McLaren Park and on Bernal Hill to degrade due to use being concentrated in a smaller area depends on the current and reasonably foreseeable future use of the areas. Through the SFRPD Final Dog Policy (SFRPD 2002), DPAs are to be reviewed every three years for, among other things, degradation of the area.

The potential impacts on this topic will be analyzed in the Environmental Impact Report.

b) The SNRAMP promotes passive recreation, or recreation that doesn't require the use of developed sites or facilities. Types of passive recreation include walking, hiking, running, dog walking, and nature watching. Approximately 211,303 feet (40.0 miles) of trail currently exist within the Natural Areas. This includes primary and secondary trails officially designated as routes and social trails that have not been officially designated and are usually user-created trails. The SNRAMP calls for the creation of 5,897 feet (1.1 miles) of new trails and the closure or rerouting of 54,411 feet (10.31 miles) of existing trails. As discussed above, trails could be closed because they are unsafe, because they are social trails, to protect sensitive species or habitat, or to prevent soil erosion. This is a net decrease of 48,514 feet (9.2 miles), or 23.0 percent, of trails within the Natural Areas.

The SFRPD would create new trails primarily in MA-2 and MA-3 areas. Trail placement in these areas would avoid sensitive vegetation and habitat. However, clearing trails for public use could involve removal of vegetation and cause short-term soil erosion.

Of the 95.2 acres of DPAs within the Natural Areas, 19.3 acres (20.3 percent) are proposed for closure (Recommendations GR-8a, GR-8b, and GR-8c). This accounts for 16.4 percent of the total acres of SFRPD-maintained DPAs. Under the SNRAMP, SFRPD would remove the Lake Merced DPA and would decrease the area of two DPAs, one on Bernal Hill and the other in McLaren Park. These DPAs are in areas with sensitive vegetation or habitat that require additional protection. The Lake Merced DPA would be closed in accordance with the SFRPD Final Dog Policy (SFRPD 2002). The SNRAMP also calls for the monitoring of DPAs for impact on oak woodlands at Buena Vista, Golden Gate Park Northeast, and MA-1 areas of the McLaren Park Shelley Loop.

The potential impacts on this topic will be analyzed in the Environmental Impact Report.

c) To address degradation of trails, the project proposes regular maintenance of these resources (Recommendation GR-11a). Posting interpretive signs that educate the public about the sensitive species and habitat in the area and that inform users about why off-trail use is discouraged (Recommendations GR-11c, GR-14b, and GR-14c) would prevent users from creating new social trails.

In the short-term, recreational resources, including trails, DPAs, and scenic viewing areas, could be temporarily closed for restoration efforts if necessary.

The potential impacts on this topic will be analyzed in the Environmental Impact Report.

E.10 UTILITIES AND SERVICE SYSTEMS

<u>Topics:</u>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>10. UTILITIES AND SERVICE SYSTEMS—Would the project:</b>					
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Have sufficient water supply available to serve the project from existing entitlements and resources, or require new or expanded water supply resources or entitlements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider that would serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Disrupt operation of or require relocation of local utilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a – c, e) The project would not generate wastewater and would not result in the construction of new water, wastewater, or stormwater facilities or the expansions of existing facilities. Therefore, those criteria are not applicable to the project.

These topics will not be discussed in the Environmental Impact Report.

d) Reintroducing native species and replacing trees would require irrigation until they become established. However, irrigation needs would be met by existing water supply capacity and would not require new or expanded water supply resources. Therefore, impacts on water supply would be less than significant.

This topic will not be discussed in the Environmental Impact Report.

f) Minor quantities of solid waste and recyclable material would be generated during the management of the Natural Areas. Unless it can be used to create

wildlife habitat, all large woody debris generated by the Natural Areas Program would be composted in Golden Gate Park. The wood chips may be used to suppress understory invasive vegetation or could be used as beneficial mulch on other revegetation projects in the Natural Areas. Also, large tree trunks may be left on site if they provide habitat value, or they may be used for recreational or maintenance purposes within the Natural Area. As such, the project would not impact landfill capacity.

This topic will not be discussed in the Environmental Impact Report.

**g)** Solid waste and recyclable material would continue to be managed in accordance with federal, state, or local regulations, resulting in no impacts.

This topic will not be discussed in the Environmental Impact Report.

**h)** With the exception of two pipelines that cross the Duncan-Castro Natural Area and may need to be removed, relocated, or buried, no other disruption or relocation of utilities is required as part of this project. The two Duncan-Castro pipelines are at the ground surface and currently pose a safety hazard. Because any actions taken regarding these pipelines would be done in such a way as to minimize service disruptions, the project would have less than significant impacts with regards to the operation of local utilities.

This topic will not be discussed in the Environmental Impact Report.

E.11 PUBLIC SERVICES

<u>Topics:</u>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>11. PUBLIC SERVICES— Would the project:</b>					
a) Result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any public services such as fire protection, police protection, schools, parks, or other services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) The project would restore and manage the Natural Areas. The project does not propose any new on-site structures that would bring new residents to the project area, requiring new schools, parks, or other services. No new public services would be required. Workers for the proposed project would either be the ten Natural Areas Program gardeners or groups of volunteers of up to 50 people. The assumption is that the volunteers already reside in the San Francisco Bay Area. Potential increases in visitor use levels, as a result of improved Natural Areas and population growth, would be adequately served by the existing capabilities of service providers. Therefore, the project would not affect public services or public service providers.

This topic will not be discussed in the Environmental Impact Report.

E.12 BIOLOGICAL RESOURCES

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>12. BIOLOGICAL RESOURCES—</b>					
<b>Would the project:</b>					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

In this Initial Study, the Potentially Significant Impact designation is being used solely to identify those topics that will be addressed in detail in the Environmental Impact Report for this project and does not reflect the findings of any preliminary impact analysis. Those topics are being included in the Environmental Impact Report because there is not sufficient information available at this time on the potentially affected resources or site conditions.

a)

**Special Status Species**

For this Initial Study, special status and/or sensitive species are defined as species that are legally protected by the California Department of Fish and Game (CDFG) or the US Fish and Wildlife Service (USFWS). Special status species

typically include species that are 1) federally listed as endangered, threatened, or candidate species (US Fish and Wildlife Service [USFWS] 2008a) or 2) state-listed as endangered, rare, threatened, California fully protected, or species of special concern (California Department of Fish and Game [CDFG] 2008). Sensitive species also include those listed on the California Native Plant Society (CNPS) plant list, i.e. the 1A list (plants presumed extinct in California) or 1B list (plants that are rare or endangered in California and elsewhere), or those that are found within the CNPS *Inventory of Rare and Endangered Vascular Plants* (CNPS 2008).

Special status species known to occur or that have been recorded historically in Natural Areas are listed in Table 2. In addition, a number of locally sensitive (LS) species may be found in San Francisco's Natural Areas, including species on the National Audubon Society's Watch List or those under threat of local extirpation as determined by the Yerba Buena chapter of the CNPS or the Golden Gate chapter of the National Audubon Society. The SFRPD has worked closely with such groups as the USFWS, CNPS, and the Audubon Society to appropriately manage special status species and to develop a list of LS species. The list of LS species from the CNPS and Golden Gate Audubon Chapter are in draft form at this time and are presented in Appendix C. All species from all lists are important for local conservation efforts and thus are analyzed in this Initial Study. However, impacts on federal, state, and CNPS 1B listed species are of greater concern because they are more likely to reduce populations, which could lead to species extinction.

### **Habitat Types**

Habitat types within the Natural Areas include annual grassland, perennial grassland, wetland, other herbaceous vegetation, northern Franciscan coastal scrub, central dune scrub, central coast riparian scrub, nonnative scrub, mosaic, native forest, nonnative forest, and "other," which is a general category for areas that either are not dominated by vegetation or are dominated by ornamental vegetation. These correspond roughly to the classification system of Sawyer and Keeler-Wolfe (1995). Special status species that may use these habitat types are presented in Table 2.

### **Impacts on Special Status Species**

Most project activities would benefit special status species and their habitats over the long-term. Management actions would aim to:

- Maintain viable populations of all special status species,
- Maintain and enhance native plant and animal communities,
- Maintain and enhance local biodiversity,
- Re-establish native community diversity, structure, and ecosystem function where degraded,

**Table 2  
Special Status Species That May Occur Within the Natural Areas**

Common Name	Scientific Name	Federal/ State/ CNPS Status	Habitat	Likelihood of Occurrence/Notes on Occurrence
<b>Invertebrates</b>				
Bay checkerspot butterfly	<i>Euphydryas editha bayensis</i>	FT/--/--	Native grasslands on outcrops of serpentine soil. Primary host plant is <i>Plantago erecta</i> . Secondary host plants are <i>Orthocarpus densiflorus</i> and <i>O. purpurscens</i> .	P/Reported from Mt. Davidson and Twin Peaks in 1980. Not currently present at either Natural Area.
Mission blue butterfly	<i>Icaricia icarioides missionensis</i>	FE/--/--	Grasslands. Larval host plants include <i>Lupinus albifrons</i> , <i>L. variicolor</i> , and <i>L. formosus</i> .	C/Reported at Sharp Park and McLaren Park in 1988 and from Bayview Park in 2001. Currently breeds on Twin Peaks
San Francisco silverspot butterfly	<i>Speyeria callippe callippe</i>	FE/--/--	Coastal scrub. Host plant is <i>Viola pedunculata</i> .	P/Historical population on Twin Peaks that is presumed extirpated. <sup>47</sup>

**Federal Status**

FE = Endangered. Species in danger of extinction throughout all or significant portion of its range.

FT = Threatened. Species likely to become endangered within foreseeable future throughout all or a significant portion of its range.

FPD = Proposed delisting.

**California State Status**

SE = Endangered. Species whose continued existence in California is jeopardized.

ST = Threatened. Species, although not presently threatened with extinction, that is likely to become endangered in the foreseeable future.

CSC = Species of Concern.

SFP = State Fully Protected under Sections 3511 and 4700 of the Fish and Game Code.

SR = State Rare

**California Native Plant Society**

1A = Plants presumed extinct in California

1B = Plants that are rare or endangered in California and elsewhere.

**Occurrence**

P = Potential

C = Confirmed

U = Unlikely

<sup>47</sup>Extirpate—to remove or destroy totally.

**Table 2**  
**Special Status Species That May Occur Within the Natural Areas** *(continued)*

Common Name	Scientific Name	Federal/ State/ CNPS Status	Habitat	Likelihood of Occurrence/Notes on Occurrence
<b>Reptiles and Amphibians</b>				
California red-legged frog	<i>Rana aurora draytonii</i>	FT/CSC/--	Lowlands and foothills in or near permanent sources of deep water with dense, shrubby, or emergent riparian vegetation. Requires 11-20 weeks of permanent water for larval development.	C/Historically observed at Lake Merced. Recently observed at Sharp Park.
San Francisco garter snake	<i>Thamnophis sirtalis elegans</i>	FE/SE, SFP/--	Freshwater marshes, ponds, and slow moving streams. Prefers dense cover and water depths of at least one foot.	P/Historically reported from Sharp Park.
Western pond turtle	<i>Clemmys marmorata</i>	--/CSC/--	Ponds, marshes, rivers, streams, and irrigation ditches with aquatic vegetation. Needs basking sites and upland habitat for egg-laying.	C/Presently occurs at Lake Merced. Presumed extant at Pine Lake but not recently observed.
<b>Fish</b>				
Tidewater goby*	<i>Eucyclogobius newberryi</i>	FPD (FE)/CSC/--	Shallow lagoons and lower stream reaches. Need fairly still, but not stagnant, water and high oxygen levels.	P/Historically collected (1895), not recently observed in San Francisco.
Central California coast steelhead*	<i>Oncorhynchus mykiss irideus</i>	FT/--/--	Cold, flowing freshwater.	P/Not available.
<b>Birds</b>				
Bank swallow	<i>Riparia riparia</i>	--/ST/--	Requires vertical banks/cliffs with fine-textured, sandy soils near streams, rivers, lakes and the ocean to dig a nesting hole.	C/Currently nests at Fort Funston and forage over Lake Merced.
California black Rail	<i>Laterallus jamaicensis coturniculus</i>	--/ST/--	Freshwater marshes, wet meadows, and shallow margins of saltwater marshes bordering larger bays.	P/Historically reported, not recently observed in San Francisco.
Double-crested Cormorant	<i>Phalacrocorax auritus</i>	--/CSC/-	Nests on coastal cliffs and in trees.	C/Presently nests at Lake Merced.
Salt marsh common yellowthroat	<i>Geothlypis trichas sinuosa</i>	--/CSC/--	Salt and freshwater marshes. Requires thick cover for foraging and dense vegetation for nesting.	C/Presently occurs at Lake Merced and Sharp Park.
Yellow warbler	<i>Dendroica petechia</i>	--/CSC/--	Riparian woodlands.	C/Observed at Lake Merced in spring 2000, breeding undocumented.
<b>Mammals</b>				
American badger	<i>Taxidea taxus</i>	--/CSC/--	Most abundant in drier, open stages of most shrub, forest, and herbaceous habitats, with friable soils. Digs burrows and preys on burrowing rodents.	P/Not available.

**Table 2**  
**Special Status Species That May Occur Within the Natural Areas** *(continued)*

<b>Common Name</b>	<b>Scientific Name</b>	<b>Federal/ State/ CNPS Status</b>	<b>Habitat</b>	<b>Likelihood of Occurrence/Notes on Occurrence</b>
Big free-tailed bat*	<i>Nyctinomops macrotis</i>	--/CSC/--	Needs high cliffs or rocky outcrops for roosting sites. Feeds principally on large moths.	P (foraging habitat)/Not available.
Pallid bat*	<i>Antrozous pallidus</i>	--/CSC/--	Deserts, grasslands, shrublands, woodlands, and forests.	P (foraging habitat) /Not available.
San Francisco dusky-footed woodrat*	<i>Neotoma fuscipes annectens</i>	--/CSC/--	Forest habitat of moderate canopy and moderate to dense understory.	C/Observed in Sharp Park.
Western red bat	<i>Lasiurus blossevillii</i>	--/CSC/--	Roosts primarily in trees, 2-40 feet above the ground. Prefers habitat edges and mosaics with trees that are protected from above and open below for foraging.	P/Recorded in Golden Gate Park (2000).
<b>Plants</b>				
Adobe sanicle	<i>Sanicula maritima</i>	--/SR/1B	Meadows and seeps, grasslands, chaparral, and coastal prairie.	P/Not available.
Alkali milk-vetch	<i>Astragalus tener</i> var. <i>tener</i>	--/--/1B	Low ground, alkali flats, and flooded lands; in annual grassland, playas, or vernal pools between 1 and 170 meters elevation.	P/Not available.
Beach layia	<i>Layia carnosa</i>	FE/SE/1B	On sparsely vegetated, semi-stabilized coastal dunes, usually behind foredunes, between 0 and 75 meters elevation.	P/Historically reported from San Francisco, location not well mapped, presumed extirpated.
Bent-flowered fiddleneck*	<i>Amsinckia lunaris</i>	--/--/1B	Woodlands and grasslands between 50 and 500 meters elevation.	P/Not available.
California seablite	<i>Suaeda californica</i>	FE/--/1B	Restricted to the upper intertidal zone of coastal salt marsh along the perimeter of a bay.	C/Recorded at India Basin.
Choris' popcorn-flower	<i>Plagiobothrys chorisianus</i> var. <i>chorisianus</i>	--/--/1B	Chaparral, coastal scrub, coastal prairie. On mesic sites between 15 and 100 meters elevation.	P/Not available.
Coastal marsh milk-vetch*	<i>Astragalus pycnostachyus</i> var. <i>pycnostachyus</i>	--/--/1B	Mesic sites in dunes or along streams or coastal salt marshes between 0 and 30 meters elevation.	P/Not available.
Coastal triquetrella	<i>Triquetrella californica</i>	--/--/1B	Coastal bluff scrub or coastal scrub habitats. Grows on moss growing on soil between 10 and 100 meters elevation.	C/Recorded on Tank Hill and several other locations within San Francisco.
Coast yellow leptosiphon*	<i>Leptosiphon croceus</i>	--/--/1B	Coastal bluff scrub and coastal prairie between 10 and 150 meters elevation.	P/Not available.

**Table 2**  
**Special Status Species That May Occur Within the Natural Areas** *(continued)*

Common Name	Scientific Name	Federal/ State/ CNPS Status	Habitat	Likelihood of Occurrence/Notes on Occurrence
Coastal marsh milk-vetch*	<i>Astragalus pycnostachyus</i> var. <i>pycnostachyus</i>	--/--/1B	Mesic sites in dunes or along streams or coastal salt marshes between 0 and 30 meters elevation.	P/Not available.
Compact cobwebby thistle	<i>Cirsium occidentale</i> var. <i>compactum</i>	--/--/1B	On dunes and on clay in chaparral; also in grassland, coastal prairie, and coastal scrub. Found between 5 and 155 meters elevation.	P/Historically recorded near Lake Merced.
Crystal Springs lessingia*	<i>Lessingia arachnoidea</i>	--/--/1B	Coastal sage scrub, grasslands, and woodlands. Found on grassy slopes on serpentine; also along roadsides. Between 60 and 200 meters elevation.	P/Not available.
Dark-eyed gilia	<i>Gilia millefoliata</i>	--/--/1B	Coastal dunes between 2 and 20 meters elevation.	P/Historically recorded within San Francisco.
Dune gilia	<i>G. capitata</i> ssp. <i>chamissonis</i>	--/--/1B	Coastal dunes and coastal scrub between 2 and 200 meters elevation.	C/Presently occurs at Hawk Hill and Lake Merced.
Fragrant fritillary	<i>Fritillaria liliacea</i>	--/--/1B	Coastal scrub, grassland, and coastal prairie between 3 and 410 meters elevation.	C/Presently occurs at Bernal Heights.
Franciscan onion*	<i>Allium peninsulare</i> var. <i>franciscanum</i>	--/--/1B	Woodlands and grasslands, on dry hillsides. Found on clay soils or serpentine between 100 and 300 meters elevation.	P/Not available.
Franciscan thistle	<i>C. andrewsii</i>	--/--/1B	Coastal bluff scrub, broadleaved upland forest, coastal scrub. Sometimes serpentine seeps. Between 0 and 135 meters elevation.	P/Historically recorded within San Francisco.
Hairless popcorn flower	<i>Plagiobothrys glaber</i>	--/--/1A	Alkali meadows, seeps, coastal salt marshes, and swamps between 5 and 180 meters elevation.	P/Not available.
Hickman's cinquefoil*	<i>Potentilla hickmanii</i>	FE/SE/1B	Freshwater marshes, seeps, and small streams in open or forested areas along the coast. Found between 5 and 125 meters elevation.	P/Not available.
Kellogg's horkelia	<i>Horkelia cuneata</i> ssp. <i>sericea</i>	--/--/1B	Closed-cone coniferous forest, coastal scrub, chaparral, old dunes, coastal sandhills. Between 10 and 200 meters elevation.	P/Recorded within San Francisco.
Marin western flax	<i>Hesperolinon congestum</i>	FT/ST/1B	In serpentine barrens and in serpentine grassland and chaparral at 30 and 365 meters elevation.	U/Historically recorded on Mount Davidson.
Marsh microseris	<i>Microseris paludosa</i>	--/--/1B	Closed-cone coniferous forest, woodlands, and grasslands between 5 and 300 meters elevation.	P/Not available.

**Table 2**  
**Special Status Species That May Occur Within the Natural Areas** *(continued)*

Common Name	Scientific Name	Federal/ State/ CNPS Status	Habitat	Likelihood of Occurrence/Notes on Occurrence
Marsh sandwort	<i>Arenaria paludicola</i>	--/--/1B	Grows up through dense mats of <i>Typha</i> spp., <i>Juncus</i> spp. and <i>Scirpus</i> spp. in freshwater marshes and swamps between 10 and 170 meters elevation.	P/Not available.
Pappose tarplant *	<i>Centromadia parryi</i> ssp. <i>parryi</i>	--/--/1B	Vernally mesic, often alkaline sites in coastal prairie, meadows, seeps, coastal salt marshes, and grassland. Found between 2 and 420 meters elevation.	P/Not available.
Point Reyes bird's-beak	<i>Cordylanthus maritimus</i> ssp. <i>palustris</i>	--/--/1B	Coastal salt marsh with <i>Salicornia</i> spp., <i>Distichlis</i> spp., and <i>Spartina</i> spp. between 0 and 15 meters elevation.	P/Habitat exists at India Basin Park.
Point Reyes horkelia *	<i>Horkelia marinensis</i>	--/--/1B	Sandy flats and dunes near the coast, in grassland or scrub plant communities between 5 and 30 meters elevation.	P/Not available.
Robust spineflower *	<i>Chorizanthe robusta</i> var. <i>robusta</i>	FE/--/1B	Sandy terraces and bluffs or in loose sand in coastal habitats between 3 and 120 meters elevation.	P/Not available.
Rose leptosiphon	<i>Leptosiphon rosaceus</i>	--/--/1B	Coastal bluff scrub between 0 and 100 meters elevation.	P/Not available.
Round-headed Chinese houses	<i>Collinsia corymbosa</i>	--/--/1B	Dunes and coastal prairie between 10 and 30 meters elevation.	P/Not available.
San Francisco Bay spineflower	<i>Chorizanthe cuspidata</i> var. <i>cuspidata</i>	--/--/1B	Coastal scrub and coastal dunes on sandy slopes and terraces between 5 and 550 meters elevation.	C/Presently occurs at Fort Funston, Golden Gate Heights, and Lake Merced.
San Francisco campion	<i>Silene verecunda</i> ssp. <i>verecunda</i>	--/--/1B	Coastal scrub, grassland, coastal bluff scrub, chaparral, coastal prairie at elevations between 30 and 645 meters.	C/Presently occurs at Mt. Davidson and Rock Outcrop.
San Francisco collinsia	<i>Collinsia multicolor</i>	--/--/1B	Closed-cone coniferous forest and coastal scrub between 30 and 250 meters elevation.	C/Presently occurs at Bayview Hill.
San Francisco gumplant	<i>Grindelia hirsutula</i> var. <i>maritima</i>	--/--/1B	Coastal scrub and grasslands between 15 and 400 meters elevation.	C/Presently occurs at Mount Davidson, Twin Peaks, Corona Heights, and Balboa Natural Area.
San Francisco lessingia	<i>Lessingia germanorum</i>	FE/SE/1B	Open sandy soils relatively free of competing plants, between 20 and 125 meters elevation.	P/Historically recorded at Lake Merced. Only current population found on the Presidio.
San Francisco owl's-clover	<i>Triphysaria floribunda</i>	--/--/1B	Coastal prairie and grassland between 10 and 160 meters elevation.	P/Historically recorded near Lake Merced.

**Table 2**  
**Special Status Species That May Occur Within the Natural Areas** *(continued)*

Common Name	Scientific Name	Federal/ State/ CNPS Status	Habitat	Likelihood of Occurrence/Notes on Occurrence
San Francisco popcorn-flower	<i>Plagiobothrys diffusus</i>	--/SE/1B	Grassland and coastal prairie with marine influence between 60 and 485 meters elevation.	P/Not available.
San Mateo woolly sunflower*	<i>Eriophyllum latiobum</i>	FE/SE/1B	Woodlands between 45 and 150 meters elevation. Found on and off serpentine.	P/Not available.
Santa Cruz microseris	<i>Stebbinsoseris decipiens</i>	--/--/1B	Broadleaved upland forest, closed-cone coniferous forest, chaparral, coastal prairie, coastal scrub. Found in open areas in loose or disturbed soils between 10 and 500 meters elevation.	P/Not available.
Western leatherwood*	<i>Dirca occidentalis</i>	--/--/1B	On mesic, brushy slopes. Mostly in mixed evergreen and foothill woodland communities between 3 and 550 meters elevation.	P/Not available.
White-rayed pentachaeta	<i>Pentachaeta bellidiflora</i>	FE/SE/1B	Open, dry, rocky slopes and grassy areas, often on soils derived from serpentine bedrock. Found between 35 and 620 meters elevation.	P/Not available.

Sources: CDFG 2008; USFWS 2008; CNPS 2008

**Federal Status**

FE = Endangered. Species in danger of extinction throughout all or significant portion of its range.  
 FT = Threatened. Species likely to become endangered within foreseeable future throughout all or a significant portion of its range.  
 FPD = Proposed delisting.

**California State Status**

SE = Endangered. Species whose continued existence in California is jeopardized.  
 ST = Threatened. Species, although not presently threatened with extinction, that is likely to become endangered in the foreseeable future.  
 CSC = Species of Concern.  
 SFP = State Fully Protected under Sections 3511 and 4700 of the Fish and Game Code.  
 SR = State Rare

**California Native Plant Society**

1A = Plants presumed extinct in California  
 1B = Plants that are rare or endangered in California and elsewhere.

**Occurrence**

P = Potential  
 C = Confirmed  
 U = Unlikely

\*Indicates species that may occur at Sharp Park only.

- Improve natural area connectivity, and
- Decrease the extent of invasive exotic species cover.

Vegetation management actions would improve structural and habitat diversity, and if feasible, special status species populations would be augmented and/or re-introduced. However, certain actions would disturb special status species and/or their habitats either directly or indirectly over the short-term. These include routine maintenance, small restoration projects, capital projects, invasive plant removal, vegetation management, visitor use, dog use, and dog play areas, and tree removal. In addition to these impacts, management actions to restore the Laguna Salada wetland at Sharp Park would disturb special status species and their habitats over the short term.

The potential impacts on this topic will be analyzed in the Environmental Impact Report.

**b)**

#### **Riparian and Sensitive Habitats**

Riparian habitat within the Natural Areas consists of willow scrub as described in the central coast riparian scrub vegetation type under criterion a). This habitat type occurs at Glen Canyon Park, Lake Merced, McLaren Park, and Sharp Park.

Several types of sensitive habitat exist within the Natural Areas, including California sagebrush scrub, dune habitat, oak woodlands, and native grasslands. These were all conspicuous components of the historic San Franciscan landscape, and are considered regionally sensitive due to acreage lost to urban development, high value to special status species, and for oak woodlands, lack of recruitment. Table 3 shows the locations of riparian and sensitive habitat types in the Natural Areas.

#### **Impacts on Riparian and Sensitive Habitats**

Overall, plan actions would improve riparian and sensitive habitats throughout the Natural Areas. However, habitat restoration projects, off-lease dog use, and the wetland restoration at Sharp Park could disturb riparian and sensitive habitats either directly or indirectly over the short term.

The potential impacts on this topic will be analyzed in the Environmental Impact Report.

**Table 3  
Riparian and Sensitive Habitat Types Within the Natural Areas**

	Natural Area																						
	Lake Merced	Glen Canyon Park	Sharp Park	McLaren Park	O'Shaughnessy Hollow	Twin Peaks	Hawk Hill	Strawberry Hill	Golden Gate Park Oak Woodlands	Balboa	Buena Vista	Corona Heights	Lily Pond	Whiskey Hill	15th Avenue Steps	Mt. Davidson	Rock Outcrop	Brooks Park	Duncan-Castro	Bayview Park	Palou-Phelps	Bernal Hill	
Habitat Type																							
Riparian	x	x	x	x																	x		
California sagebrush scrub	x	x	x			x																	
Dune	x						x	x	x	x							x						
Oak woodland	x	x		x		x		x	x		x	x	x	x	x								
Native grasslands	x	x	x	x								x				x	x	x	x	x	x	x	x

Source: SFRPD 2006

c)

#### **Wetland Habitat**

Several different types of wetlands are present within the Natural Areas. A wetland delineation has been conducted at Sharp Park. Although wetland delineations have not been conducted for other wetlands within the Natural Areas, they likely fall under the jurisdiction of Section 404 of the Clean Water Act.

Wetland types within the Natural Areas include free flowing creeks (Glen Canyon Park and Sharp Park), tidal salt marsh wetland (India Basin), open water (Lake Merced, Pine Lake, and Sharp Park), wet meadow (Bayview Park, Lake Merced, McLaren Park, and Sharp Park), and freshwater marsh (Lake Merced, McLaren Park, Pine Lake, and Sharp Park). These areas are likely jurisdictional wetlands or waters of the US and are thus regulated by the US Army Corps of Engineers (USACE). Typical actions that trigger the need for Clean Water Act Section 404 compliance include dredging or filling of wetlands or portions of a wetland or bank alteration.

#### **Impacts on Wetland Habitat**

Overall, project activities would protect and enhance wetlands within the Natural Areas. However, certain actions would disturb wetlands either, directly or indirectly, over the short-term through direct removal, filling, hydrological interruption, or other means. These include habitat enhancement at Sharp Park and Glen Canyon.

The potential impacts on this topic will be analyzed in the Environmental Impact Report.

d)

#### **Native Resident and Migratory Fish**

Native resident and migratory fish are limited in the Natural Areas, but do exist at Lake Merced and Pine Lake. Native resident fish at Lake Merced include hitch (*Lavinia exilicauda*), hardhead (*Mylopharodon conocephalus*), Sacramento blackfish (*Orthodon microlepidotus*), Sacramento sucker (*Catostomus occidentalis*), threespine stickleback (*Gasterosteus aculeatus*), prickly sculpin (*Cottus asper*), and Sacramento perch (*Archoplites interruptus*). Rainbow trout (*Oncorhynchus mykiss*) are present in Lake Merced, but there is no spawning habitat for them in the lake, so they cannot reproduce. Ongoing stocking would be required to maintain that fishery. Threespine stickleback are found at Pine Lake. The one migratory fish found in the Natural Areas is coho salmon (*O. kisutch*), which was recorded at Lake Merced.

## Migratory Birds

Many migratory birds use the Natural Areas for foraging, nesting, and perching habitat, as the Natural Areas provide habitat in an area that is otherwise highly urbanized and provides little habitat. Migratory birds that use the Natural Areas are presented in Appendix C.

Some of the larger Natural Areas, such as Lake Merced, McLaren Park, and Sharp Park, provide a complex mosaic of habitats that are used for foraging, nesting, and roosting by migratory and resident birds, and thus are more important bird habitat compared with the smaller natural areas. In particular, Lake Merced provides open water, freshwater marsh, riparian, and upland habitats that are heavily used by bird species. This location serves as an important resting area for migratory birds, and is a nesting area for approximately 50 species of resident birds (SFRPD 2006). Almost 70 species of birds have been documented nesting within the Lake Merced area, and several of these are of special concern, locally rare, or neotropical migrants.

Among the Natural Areas, India Basin is the only one that borders San Francisco Bay and provides the only habitat for migratory shorebirds. There are ten species of birds that are considered locally sensitive that have been observed at India Basin, and several of these are found at no other Natural Area: black oystercatcher (*Haematopus bachmani*), pelagic cormorant (*Phalacrocorax pelagicus*), Brandt's cormorant (*P. penicillatus*), and pigeon guillemot (*Cepphus columba*). None of the LS species that have been observed are known to breed at India Basin. The restored wetlands and mudflats support nesting American avocet (*Recurvirostra americana*) and killdeer (*Charadrius vociferus*). If restored, the more extensive saltgrass/pickleweed area could provide habitat for California black rail (*Laterallus jamaicensis coturniculus*) and California clapper rail (*Rallus longirostris obsoletus*), both protected under the state and federal Endangered Species Acts.

Smaller Natural Areas, such as Hawk Hill and Grandview Park, may provide suitable nesting and foraging habitat for small songbirds, and may support a prey base for foraging raptors.

## Wildlife Corridors

Overall, the Natural Areas provide a mosaic of habitats that are accessible to mobile wildlife species, particularly birds. They offer foraging, nesting, and roosting habitats for many species as they travel within San Francisco and beyond.

Lake Merced is the largest freshwater coastal lake and wetland system between the Pescadero Marsh in south San Mateo County and the Point Reyes Peninsula in Marin County. As such, it provides refuge for many migratory birds, as described above.

Sharp Park is bordered by undeveloped areas, including Sweeny Open Space and Milagra Ridge, which allows it to serve as a relatively undisturbed corridor for wildlife, particularly birds. Sharp Park's connectivity to high-quality natural habitats also allows it to support medium size and large mammals, including numerous general wildlife species such as the black-tailed deer (*Odocoileus hemionus columbianus*), bobcat (*Lynx rufus californicus*), common porcupine (*Erethizon dorsatum epixanthum*), coyote (*Canis latrans*), and mountain lion (*Felis concolor californicus*).

#### **Native Wildlife Nursery Sites**

All of the Natural Areas support potential and/or confirmed nesting native bird habitat. Native birds that may nest within the Natural Areas include shorebirds, songbirds, and raptors, and include habitats such as nonnative forests, grasslands, and riparian scrub.

#### **Impacts on Native Resident and Migratory Fish, Migratory Birds, Wildlife Corridors, and Native Wildlife Nursery Sites**

Overall, plan activities would improve and connect habitats, thereby improving the ability of native resident or migratory fish or wildlife species to migrate. However, certain actions could disturb these species either directly or indirectly over the short term. These include disruption from visitor use, invasive tree removal, use of DPAs, and habitat restoration activities. In addition, management actions to restore the Laguna Salada wetland at Sharp Park could disturb native resident fish and migratory fish and wildlife species over the short term.

The potential impacts on this topic will be analyzed in the Environmental Impact Report.

e) The SFRPD would comply with all local policies and ordinances protecting biological resources. These include tree protection ordinances, such as the San Francisco Urban Forestry Ordinance. Several Landmark Trees are found in or near the Natural Areas. These include a blue elderberry tree (*Sambucus mexicana*) within Bernal Hill, a Canary Island Date Palm (*Phoenix canariensis*) near Palou-Phelps, and a New Zealand Christmas Tree (*Metrosideros excelsus*) adjacent to the Interior Greenbelt. Other applicable ordinances include the Significant Tree Ordinance of San Mateo County and Ordinance 636-C.S., which limits logging within Pacifica and applies to tree removal at Sharp Park. Management actions would not conflict with these or other applicable ordinances. As a result, there would be no impact due to conflicts with local policies or ordinances.

f) There are no adopted Habitat Conservation Plans or Natural Community Conservation Plans that apply to management of the Natural Areas. Species recovery plans have been finalized for the Bay checkerspot butterfly, mission blue butterfly, CRLF, SFGS, beach layia, Marin western flax (*Hesperolinon congestum*), San Francisco lessingia (*Lessingia germanorum*), and white-rayed

pentachaeta (*Pentachaeta bellidiflora*). These plans are ultimately designed and created to recover the species and the ecosystems on which they depend. This includes protecting and often restoring the habitat in which the species can thrive. These recovery plans would apply to some of the Natural Areas, including those where the species have been documented, including Bayview Park, Lake Merced, McLaren Park, Mount Davidson, Sharp Park, and Twin Peaks. The SFRPD's goal of species preservation and recovery is in accord with these recovery plans. Management actions in the SNRAMP would improve special status species habitat and avoid, protect, and monitor special status species (GR 1-10). As a result, there would be no impact due to conflicts with any of the approved species recovery plans.

E.13 GEOLOGY AND SOILS

<u>Topics:</u>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>13. GEOLOGY AND SOILS—</b>					
<b>Would the project:</b>					
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:					
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Change substantially the topography or any unique geologic or physical features of the site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The main activities in the proposed project that might impact geology and soils include the following:

- Implementing erosion control measures in gullies that have formed due to erosion, including regrading the gullies, emplacing compacted and staked brush, building check dams and small swales, and putting straw bale barriers in place alongside the gullies;
- Implementing erosion control measures for streambank protection, including thinning vegetation to improve riparian habitat, replanting streambanks with native and special status species, and placing erosion control blankets, mats, mulch, or wood chips on the streambank while the new vegetation establishes root;

- Removing nonnative trees and other vegetation and replacing them with native and special status species; and
- Regrading, recontouring, or repaving roads.

The overall scale of the proposed project is relatively small, and while these activities may result in some increased erosion and loss of topsoil in the Natural Areas, these impacts are generally considered less than significant.

**a) i)** The proposed project would not expose people or structures to potential substantial adverse effects involving rupture of a known earthquake fault. The proposed project does not involve the construction of any residences or structures that would be occupied. Ground rupture most commonly occurs along preexisting faults. No known active faults cross the Natural Areas, and the sites are not within an Alquist-Priolo Earthquake Hazard Zone (State of California 1982). Therefore, this criterion is not applicable to the proposed project.

This topic will not be discussed in the Environmental Impact Report.

**a) ii)** The proposed project would not expose people or structures to potential substantial adverse effects involving strong seismic shaking. The proposed project does not involve the construction of any residences or structures that would be occupied. While there is a potential for strong ground shaking at all 31 of the Natural Areas due to a nearby earthquake, the proposed project would not increase the likelihood that people or structures would experience adverse effects from strong ground shaking. As discussed in Section A, some of the goals of the SNRAMP that may impact geology and soils are a) to maintain and enhance native plant and animal communities, b) to re-establish native community diversity, structure, and ecosystem function where degraded, and c) to decrease the extent of invasive exotic species cover. The proposed project may result in increased visitor use of the Natural Areas due improvements in the Natural Areas, and in this regard, may increase the exposure of people to strong seismic shaking. Because the proposed project would not increase the potential for ground failure in these areas, it would not expose people to potential substantial adverse effects involving strong seismic shaking and would have less than significant impacts.

This topic will not be discussed in the Environmental Impact Report.

**a) iii)** The proposed project would not expose people or structures to potential substantial adverse effects involving seismic-related ground failure, including liquefaction<sup>48</sup>. According to the most current Hazard Zones Map for the City and

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<sup>48</sup>Liquefaction—the process of changing soil and unconsolidated sediments into water mixture immediately following an earthquake; often results in foundation failure, with sliding of the ground under buildings and structures.

County of San Francisco, India Basin Shoreline Park and Lake Merced are the only two Natural Areas that are in areas where there has been a historic occurrence of liquefaction (State of California 2000). Because none of the proposed activities would expose people or structures to potential substantial adverse effects from seismic-related ground failure, the proposed project would have no impact with regard to this criterion.

This topic will not be discussed in the Environmental Impact Report.

**a) iv)** The proposed project would not expose people or structures to potential substantial adverse effects involving landslides. According to the most current Hazard Zones Map for the City and County of San Francisco, many of the Natural Areas are in areas where there has been a previous occurrence of landslides, or local information indicates the potential for permanent ground displacements (State of California 2000). However, none of the activities in the proposed project would expose people or structures to potential substantial adverse effects from landslides because most of the proposed activities are related to improving natural habitat and minimizing erosion and loss of topsoil. While there may be some short-term impacts related to additional erosion and loss of topsoil from the proposed management activities (removing nonnative vegetation, regrading land, maintaining and improving riparian corridors, paving or regrading roads, and creating new trails), the long-term effects of the proposed project would minimize erosion and reduce the risk from potential landslides. Therefore, the proposed project would have a less than significant impact with regard to this criterion.

**b)** The proposed project includes some regrading work, tree and vegetation removal and replacement, construction of a detention basin, and possibly some road modifications. All of these activities have the potential to result in erosion. Continued use of DPAs in many of the Natural Areas would result in loss of vegetation, causing topsoil to be exposed; however, the magnitude of this impact is not expected to result in significant erosion. Use of erosion control measures under GR-12b, such as fiber rolls, silt fences, and straw mulch/wood chips, may be appropriate for these areas to ensure that there are minor erosion impacts from the DPAs. The Natural Areas that have the potential to experience substantial soil erosion because of project activities include Bayview Park, Glen Canyon Park and O'Shaughnessy Hollow, India Basin Shoreline Park, and Lake Merced. Each of these is discussed below.

The proposed project also incorporates measures to address these potential impacts, resulting in less than significant impacts with regard to substantial soil erosion and topsoil loss. The general approaches that are included as part of the proposed project and would be utilized at the Natural Areas to minimize erosion include the following:

- Large-scale restoration, such as regrading, recontouring, or repaving roads, constructing a detention basin, or building check dams and swales, would be conducted during the appropriate time of year (generally during the dry season) and at an appropriate scale to minimize erosion. At any one time, the area of vegetation removal would be relatively small to minimize the potential for erosion. (GR-1c). Smaller-scale activities, such as removing weeds and invasive species and replanting, may be conducted year-round but would be conducted at a scale that is appropriate to minimize erosion.
- Work that involves exposure of large areas of soil would be completed during the dry season whenever possible. (GR-12b)
- BMPs would be implemented to reduce the erosion risk during the transition period between removal of vegetation and the establishment of replacement vegetation (GR-12b). Erosion-control BMPs incorporated into the proposed project include fiber rolls, straw bales, silt fences, and straw mulch, wood chips, and rolled erosion control products.

The SNRAMP is intended to be an active living document, using an adaptive management approach in the Natural Areas. As such, adaptations in the management approach would be made in response to changing conditions. For example, if tree replantings were not to take hold, substitute vegetation may be installed. Additionally, if management activities such as tree removal were to result in erosion within a Natural Area, best management practices, such as wood mulch, fiber rolls, and silt fences, would be implemented to minimize erosion.

### Bayview Park

Activities outlined in the SNRAMP that might result in erosion or loss of topsoil include removing nonnative vegetation and replacing it with native and special status species (VP-1a through VP-1e<sup>49</sup> and VP-2a<sup>50</sup>), constructing a small berm for water storage (VP-3a<sup>51</sup>), and implementing erosion control measures in

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<sup>49</sup> VP-1a—reduce and contain herbaceous and woody invasive plants;  
 VP-1b—remove approximately 511 of the estimated 6,000 invasive trees (primarily blue gum eucalyptus) to enhance sensitive species habitats;  
 VP-1c—protect and maintain existing native habitats;  
 VP-1d—augment existing sensitive plant populations;  
 VP-1e—reintroduce populations of sensitive plant species to help prevent extinctions of these species in San Francisco.

<sup>50</sup> VP-2a—install coast live oak seedlings and other native plants in gaps and openings in the eucalyptus forest.

<sup>51</sup> VP-3a—construct a small berm to create a seasonal wetland and detention basin, if capital funds are made available.

gullies (VP-9a<sup>52</sup>). While these activities are intended to provide long-term erosion control and natural resources diversity benefits, short-term impacts may occur during their implementation. Erosion or loss of topsoil may occur as soil is moved during regrading activities. Topsoil may be lost as trees and other vegetation are removed, and during the planting of native species. However, the general recommendations that are incorporated into the proposed project would ensure that impacts from these activities are less than significant.

### Glen Canyon Park and O'Shaughnessy Hollow

Activities outlined in the SNRAMP that might result in erosion or loss of topsoil include trimming and removing willows in the wet meadow (GC/OH-1e)<sup>53</sup>; maintaining and improving the riparian corridor for Islais Creek by thinning willow trees, removing invasive plants, and revegetating with appropriate species (GC/OH-2a)<sup>54</sup>; installing instream structures, such as wingwalls to create scour and maintain pools (GC/OH-2b)<sup>55</sup>; removing nonnative trees and other vegetation and replacing them with native and special status species (GC/OH-1e); installing boardwalks in wet marshy locations along Islais Creek and at creek crossings (GC/OH-9b)<sup>56</sup>; filling gullies that have formed along the gravel access road due to erosion with gravel, maintaining water bars along the gravel access road, and if funds are available, paving or regrading the gravel access road (GC/OH-10a)<sup>57</sup>; maintaining the existing sediment dam or installing new sediment traps on the lower reaches of the creek, and if funds are available, excavating the soil behind the dam and repairing or replacing the dam (GC/OH-10c)<sup>58</sup>.

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<sup>52</sup> VP-9a—create a detailed and complete erosion control plan before beginning work on the large gully near the summit; work would include 1) installing a minimum of two check-dams within the upper portion of the gully, 2) creating soil berms and troughs between these two structures, 3) removing soil from the upper edges of the gully to create at 1:1 slope, 4) installing a staked brush pile or brush box immediately below the upper edge of the gully, 5) install one or two staked brush bundles in the vegetated swale leading into the gully from the direction of the radio tower, 6) install rice straw bales along all edges of the gully, and 7) hand broadcast the entire area with the appropriate native grass seed once construction is complete and before the fall rains.

<sup>53</sup> GC-OH-1e—remove approximately 120 of the estimated 6,000 invasive blue gum eucalyptus trees in Glen Canyon Park to maintain and enhance native habitats.

<sup>54</sup> GC-OH-2a—thin sections of the overstory within the riparian corridor and reduce invasive plants in the understory.

<sup>55</sup> GC-OH-2b—prevent willows from encroaching on open water and create new and stable pool habitats.

<sup>56</sup> GC-OH-9b—install boardwalks in wet marshy locations along the Islais Creek loop trail to prevent damage to existing resources and increased sedimentation in the creek.

<sup>57</sup> GC-OH-10a—fill existing gullies in the access road with gravel to help minimize the input of sediment from the gravel access road, outslope the road the next time it is graded or resurfaced to allow uniform flow of runoff from the hillside across the road to the creek and to eliminate ponding and reduce gullying in the road, evaluate and replace the existing culverts as necessary, and consider paving the access road.

<sup>58</sup> GC-OH-10c—maintain the existing sediment dam and consider installation of new sediment traps on the lower reach of the creek.

While these activities are intended to provide long-term erosion control, improved habitat, and other natural resources diversity benefits, short-term impacts may occur during their implementation. Topsoil may be eroded or lost as soil is moved during regrading, road modification, and gully filling. Topsoil may be lost as trees and other vegetation are removed and when native species are planted. Much of the work at this park would occur along Islais Creek, which can carry eroded soil away, exacerbating the problem. Streambank soil can be easily disturbed during construction, including boardwalks, dams, and sediment traps. However, the general recommendations that are incorporated into the proposed project ensure that impacts from these activities would be less than significant.

#### **India Basin Shoreline Park**

Activities outlined in the SNRAMP that might result in erosion or loss of topsoil include removing invasive species from the salt marsh and upland areas (IB-1a)<sup>59</sup>. While these activities are intended to provide long-term erosion control, improved habitat, and other natural resources diversity benefits, short-term impacts may occur during their implementation. Minor erosion or loss of topsoil during activities on the levee may result in negligible sedimentation of San Francisco Bay. Removal of invasive species within the salt marsh can mobilize sediment, impacting water quality in the Bay. However, the general recommendations that are part of the proposed project would ensure that impacts from these activities would be less than significant.

#### **Lake Merced**

Activities outlined in the SNRAMP that might result in erosion or loss of topsoil include removing trees that are on the slopes and encroaching into wetlands that surround North, South, and East Lakes (LM-6a)<sup>60</sup> and treating small-scale erosion gullies with gully plugs, brush boxes, energy dissipaters, and water bars, and planting these areas with the appropriate native vegetation to restore habitat and create future erosion barriers (LM-9a)<sup>61</sup>. While these activities are intended to provide long-term erosion control, improved habitat, and other natural resources diversity benefits, short-term impacts may occur during their implementation. Erosion or loss of topsoil may occur as the small-scale gullies are repaired. Furthermore, tree removal along the slopes of North, South, and East Lakes has the potential to cause additional erosion in these areas. However, the general recommendations that would be implemented as part of the

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<sup>59</sup> IB-1a—monitor the salt marsh for smooth cordgrass and other invasive species; reduce and contain infestations of upland invasive species.

<sup>60</sup> LM-6a—remove invasive vegetation and enhance native scrub and grassland species in upland sandy soils adjacent to East Lake to allow for western pond turtle nesting. Create piles of logs or rocks to increase and improve basking habitat.

<sup>61</sup> LM-9a—treat small-scale erosion gullies with measures such as gully plugs, brush boxes, energy dissipaters, and water bars, and plant these areas with native vegetation to prevent soil erosion.

proposed project would ensure that impacts from these activities would be less than significant.

This topic will not be discussed in the Environmental Impact Report.

**c)** The proposed project would not cause a geologic unit or soils to become unstable and would not result in on- or off-site landslide, lateral spreading<sup>62</sup>, subsidence<sup>63</sup>, liquefaction, or collapse. The proposed project includes some road modifications, tree and vegetation removal, construction of a detention basin, and possibly channel widening and other habitat improvement activities in creek and wetland environments. None of these activities would cause a geologic unit or soil to become unstable, and none would result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

This topic will not be discussed in the Environmental Impact Report.

**d)** The proposed project would not create substantial risks to life or property because no buildings would be constructed on expansive soil<sup>64</sup>. The proposed project includes road modifications, tree and vegetation removal, construction of a detention basin, and possibly channel widening and other habitat improvement activities in creek and wetland environments. Because none of these activities would involve the construction of buildings on expansive soil, which could expose people or structures to risks, this significance criterion is not applicable.

This topic will not be discussed in the Environmental Impact Report.

**e)** The proposed project does not include any work with sewers or septic tanks, and sewers and septic tanks would not likely be installed in the Natural Areas in the future; therefore, this significance criterion is not applicable.

This topic will not be discussed in the Environmental Impact Report.

**f)** The proposed project would not substantially change the topography or any unique geologic or physical features of the sites. Unique geologic features of the Natural Areas include picturesque rock outcrops and some of the last remaining sand dune systems in San Francisco. Franciscan rock, associated with the tectonic margin at the western edge of California, forms outcrops at Bayview Park, Glen

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<sup>62</sup>Lateral spreading—landslides that commonly form on gentle slopes and that have rapid fluid-like flow movement, like water.

<sup>63</sup>Subsidence—a lowering of the land surface in response to subsurface weathering, collapse or slow settlement of underground mines, or the production of subsurface fluids such as ground water or oil.

<sup>64</sup>Expansive soil—soils or rocks characterized by clayey material that shrinks and swells as it dries or becomes wet, respectively. Expansive soils are subject to changes in volume and settlement in response to wetting and drying, often resulting in severe damage to structures.

Canyon Park, O'Shaughnessy Hollow, McLaren Park, Grandview Park, Rock Outcrop, Golden Gate Heights Park, and Duncan-Castro. Rock types that occur in these areas include chert, sandstone interbedded with shale, greenstone, and serpentine. The sand dune systems are most prominent in the Grandview Park, Rock Outcrop, Golden Gate Heights Park, and Hawk Hill group of parks but also occur in Buena Vista Park, Lakeview/Ashton Mini Park and Balboa Natural Area. While the proposed project includes road modifications and some regrading and filling of gullies to minimize erosion and topsoil<sup>65</sup> loss, none of the project activities would substantially change the topography or any unique geologic or physical features of the Natural Areas.

This topic will not be discussed in the Environmental Impact Report.

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<sup>65</sup>Topsoil—surface soil usually including the organic layer in which plants have most of their roots and which a farmer turns over in plowing.

E.14 HYDROLOGY AND WATER QUALITY

<u>Topics:</u>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>14. HYDROLOGY AND WATER QUALITY— Would the project:</b>					
a) Violate any water quality standards or waste discharge requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion of siltation on- or off-site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other authoritative flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j) Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

In this Initial Study, the Potentially Significant Impact designation is being used solely to identify those topics that will be addressed in detail in the Environmental Impact Report and does not reflect the findings of any preliminary impact analysis. Those topics are being included in the Environmental Impact Report because there is not sufficient information available at this time on the potentially affected resources or site conditions.

Many of the Natural Areas do not have water bodies, and none of the maintenance activities in these Natural Areas are intrusive enough to have significant impacts on hydrology and water quality through stormwater effects. The following Natural Areas currently have or will have water bodies and are the focus of the impact analysis in this section: Bayview Park (proposed detention basin/seasonal wetland), Lake Merced, Pine Lake, India Basin Shoreline Park (San Francisco Bay), Golden Gate Park Oak Woodlands (Stow Lake), McLaren Park, Glen Park and O'Shaughnessy Hollow (Islais Creek), and Sharp Park (Sanchez Creek and Laguna Salada).

The main activities in the proposed project that might impact water quality and flooding include the following:

- Implementing erosion control measures in gullies that have formed due to erosion, including regrading the gullies, emplacing compacted and staked brush, building check dams and small swales, and putting straw bale barriers in place along side the gullies;
- Implementing erosion control measures for streambank protection, including thinning vegetation to improve riparian habitat, replanting streambanks with native and special status species, and placing erosion control blankets, mats, mulch, or wood chips on the streambank while the new vegetation is established;
- Removing nonnative trees and other vegetation and replacing them with native and special status species; and
- Regrading, recontouring, or repaving roads.

The overall scale of the proposed project is relatively small, and while these activities may result in some increased erosion and loss of topsoil in the Natural Areas (see Section E.13, Geology and Soils), it is unlikely that these activities would cause significant impacts on hydrologic processes or water quality in most of the Natural Areas. The one exception to this is at Sharp Park, where the water bodies provide important natural habitat, and management activities may impact the hydrology and water quality of Sanchez Creek and Laguna Salada. Hydrologic and water quality impacts on Sharp Park will be fully analyzed in the Environmental Impact Report. To further lessen impacts of the management activities, the SFRPD would limit large-scale management activities, such as building check dams, regrading, recontouring, repaving roads, or constructing a detention basin to the dry season, which would minimize the potential for erosion and topsoil loss (GR-12b). Smaller scale activities, such as removing weeds and invasive species and replanting, may be conducted year-round but would be conducted at a scale that is appropriate to minimize erosion. Additionally, if such management activities as tree removal were to result in erosion within a Natural Area, best management practices, such as wood mulch,

fiber rolls, and silt fences, would be implemented to minimize erosion and to limit or eliminate associated water quality impacts.

The following sections discuss each of the significance criteria for hydrology and water quality.

**a)** The proposed project would have no impact with regard to violating water quality standards or waste discharge<sup>66</sup> requirements at most of the Natural Areas but could have a potentially significant impact by violating water quality standards or waste discharge requirements at Sharp Park; impacts on Sharp Park will be fully analyzed in the Environmental Impact Report. The few water bodies that are present in the Natural Areas are described above. The primary project activities that might impact water quality involve removal of invasive, nonnative trees and other vegetation, erosion control work performed in gullies, and stream improvement work. Any management activities that require a Section 404 permit would comply with the BMPs that are made a condition of the permit and BMPs that are proposed as part of the SNRAMP. The primary impact these activities could have on water quality would be to increase the sediment load<sup>67</sup>, typically measured as total suspended solids (TSS). While these activities may contribute some sediment to water bodies in or near the Natural Areas, the scale of proposed activities is too small to have a substantial impact on water quality or to cause a violation of a waste discharge requirement, with the exception of Sharp Park, where project activities could have a potentially significant impact.

**b)** The proposed project would have a less than significant impact on groundwater supplies and groundwater recharge<sup>68</sup> in most of the Natural Areas but could have a potentially significant impact on groundwater supplies and groundwater recharge in Sharp Park; impacts on Sharp Park will be fully analyzed in the Environmental Impact Report. There is no removal of water, either from groundwater or any surface water bodies near the Natural Areas included in the proposed project. The proposed activities may actually increase groundwater recharge in the Natural Areas, by minimizing surface runoff and allowing more of this water to infiltrate into the ground.

**c)** The proposed project would have a less than significant impact from drainage pattern alterations that result in substantial erosion in most of the Natural Areas, but the project could have a potentially significant impact at Sharp Park. This impact will be fully analyzed in the Environmental Impact Report. There are no

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<sup>66</sup>Discharge—the flow of surface water into a stream or canal or the outflow of groundwater from a flowing artesian well, ditch, or spring. Also refers to the discharge of liquid effluent from a facility.

<sup>67</sup>Sediment load—the total quantity of sediment, as measured by dry weight or volume, that moves past a site during a given time.

<sup>68</sup>Groundwater recharge—inflow to aquifers from precipitation, infiltration, through-flow, or other means that replaces groundwater lost through pumping or other forms of discharge. The process of water being added to the saturated zone *or* the volume of water added by this process.

activities included in the proposed project that would significantly alter the existing drainage pattern of the sites, and there is no significant streambed or riverbed alteration proposed in this project, with the exception of the proposed improvements to Sanchez Creek and Laguna Salada. Some of the proposed project activities, such as repairing gullies, recontouring or repaving roads, and implementing streambank erosion control measures, might initially cause some additional erosion or siltation<sup>69</sup> on- or off-site. Additionally, some of the vegetation removal/replacement activities and trail creation may slightly alter drainage patterns at the different Natural Areas and might cause a small increase in the rate of stormwater flow. However, these activities would not cause substantial erosion or siltation and would not significantly alter the existing drainage patterns of the sites. Over time, the proposed project is expected to reduce the amount of erosion and siltation occurring on-site and off-site and may reduce stormwater flows. Reduced erosion, siltation, and stormwater flows would result from increased vegetative cover due to the proposed plantings, erosion control measures implemented for streambank protection and gullies, and regrading and recontouring roads.

**d)** The proposed project would have a less than significant impact with regard to drainage pattern alterations that result in flooding in most of the Natural Areas, but the project could have a potentially significant impact at Sharp Park. This impact will be fully analyzed in the Environmental Impact Report. There are no activities included in the proposed project which would significantly alter the existing drainage pattern of the sites, or substantially increase runoff such that flooding occurs, with the exception of the proposed improvements to Sanchez Creek and Laguna Salada. Some of the proposed project activities, such as repair of gullies, recontouring or repaving roads and streambank erosion control measures might initially cause some additional surface runoff. However, these activities would not cause substantial additional surface runoff, and would not cause flooding. Over time, the proposed project is expected to reduce the amount of surface runoff by dispersing water more widely over the ground surface, thereby increasing infiltration rates.

**e)** The proposed project would have a less than significant impact with regard to stormwater drainage systems and polluted runoff in most of the Natural Areas but the project could have a potentially significant impact at Sharp Park. This impact will be fully analyzed in the Environmental Impact Report. The proposed project activities, such as repair of gullies, recontouring or repaving roads, and implementing streambank erosion control measures, are designed to reduce erosion, improve water quality, and improve wildlife habitat. While these activities might initially cause some additional surface runoff, with TSS as the primary pollutant, the quantity of additional runoff caused by the project

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<sup>69</sup>Siltation—sediment influx from either erosion or from sediment carried into a water body by inflowing rivers and tributaries.

activities would not cause the capacity of existing or planned stormwater drainage systems to be exceeded, and would not be large enough to be considered a substantial source of polluted water. Additionally, the use of gasoline-powered equipment to perform some of the activities described in the SNRAMP may result in small discharges of gasoline to the ground surface. While this would be a minor source of pollution, as discussed in Section E.15, the SFRPD would implement Mitigation Measure HZ-1, which requires that if any vehicles or equipment required refueling, they would be refueled at least 100 feet from any stream or water body. Mitigation Measure HZ-1 also requires an emergency response plan to be prepared in order to address accidental release of hazardous materials. Implementation of Mitigation Measure HZ-1 would reduce potential impacts from equipments to less than significant.

f) The proposed project would have a less than significant impact with regard to otherwise degrading water quality in most of the Natural Areas, but the project could have a potentially significant impact at Sharp Park. This impact will be fully analyzed in the Environmental Impact Report. As discussed under the prior significance criteria in this section and the Geology and Soils section, the primary pollutant for the project activities would be TSS. Impacts on water quality would be concentrated locally within each Natural Area, and these impacts would be less than significant. The following water bodies might have water quality impacts due to the proposed project:

- Lake Merced;
- Islais Creek (Glen Canyon Park);
- SF Bay (India Basin Shoreline Park);
- Pine Lake;
- Two small creeks in McLaren Park;
- Stow Lake;
- Sanchez Creek (Sharp Park);
- Laguna Salada (Sharp Park); and
- A small irrigation pond, known as Arrowhead Lake, in Sharp Park.

While project activities may increase water flows in some of the creeks and water bodies located in the Natural Areas (Lake Merced, Pine Lake, Islais Creek in Glen Park), these activities would also have a less than significant impact with regard to this criterion.

g) Because there are no houses or other significant structures planned as part of the proposed project, this criterion is not applicable. The only Natural Areas within a 100-year flood hazard area are India Basin, Bayview Park, and Sharp Park, which are discussed under topic h) below.

This topic will not be discussed in the Environmental Impact Report.

**h)** Development in San Francisco must account for flooding potential. Areas on fill or bay mud can subside to a point at which the sewers do not drain freely during a storm (and sometimes during dry weather), and there can be backups or flooding near streets and sewers. The only Natural Areas that fall within a flood-prone area during storms are India Basin, a small portion of Bayview Park, and Sharp Park, which is outside of San Francisco. However, no structures are proposed in these areas. As required, the sponsor for the proposed project would coordinate a review with SFPUC, to determine if the project would result in ground-level flooding during storms, and would incorporate any required design measures. Therefore, the project would result in less than significant impact on flood flows.

Flood risk assessment and some flood protection projects are conducted by federal agencies, including the Federal Emergency Management Agency (FEMA) and the USACE. The flood management agencies and cities implement the National Flood Insurance Program (NFIP) under the jurisdiction of FEMA and its Flood Insurance Administration. CCSF does not participate in the NFIP, and no flood maps are published for the city. However, FEMA is preparing Flood Insurance Rate Maps (FIRMs) for San Francisco for the first time, and there is a FIRM for Sharp Park, which is outside of San Francisco. FIRMs identify areas that are subject to inundation during a flood having a one percent chance of occurrence in a given year (also known as a base flood or 100-year flood). FEMA refers to the floodplain that is at risk from a flood of this magnitude as a special flood hazard area (SFHA).

Because FEMA has not previously published a FIRM for San Francisco, there are no identified SFHAs within San Francisco's geographic boundaries. Portions of Laguna Salada and Sanchez Creek in Sharp Park are within an SFHA and are designated as Zone A (areas with a one percent annual chance of flooding and a 26 percent chance of flooding over the life of a 30-year mortgage). FEMA has completed the initial phases of a study of San Francisco Bay. On September 21, 2007, FEMA issued a preliminary FIRM of San Francisco for review and comment by CCSF, which has submitted comments on the preliminary FIRM to FEMA. FEMA anticipates publishing a revised preliminary FIRM in 2009, after completing the more detailed analysis that Port of San Francisco and CCSF staff requested in 2007. After reviewing comments and appeals related to the revised preliminary FIRM, FEMA will finalize the FIRM and publish it for flood insurance and floodplain management purposes.

FEMA has tentatively identified SFHAs along San Francisco's shoreline in and along San Francisco Bay, consisting of Zone A (in areas subject to inundation by

tidal surge) and Zone V (areas of coastal flooding subject to wave hazards).<sup>70</sup> On June 10, 2008, the San Francisco Board of Supervisors introduced legislation to enact a floodplain management ordinance to govern construction and substantial improvements in flood prone areas of San Francisco and to authorize the City's participation in NFIP. Specifically, the proposed floodplain management ordinance includes a requirement that any construction or substantial improvement of structures in a designated flood zone must meet the flood damage minimization requirements in the ordinance. The NFIP regulations allow a local jurisdiction to issue variances to its floodplain management ordinance under certain narrow circumstances, without jeopardizing the local jurisdiction's eligibility in the NFIP. However, the particular projects that are granted variances by the local jurisdiction may be deemed ineligible for federally backed flood insurance by FEMA.

Once the Board of Supervisors adopts the Floodplain Management Ordinance, the Department of Public Works will publish flood maps for the City, and applicable City departments and agencies may begin implementing construction and substantial improvements in areas shown on the Interim Floodplain Map.

According to the preliminary map, the only Natural Area within a preliminary SFHA is India Basin, which is within Zone V (an area of coastal flooding subject to wave hazards). However, there are no structures proposed for India Basin. Additionally, the Floodplain Management Ordinance is expected to require, in general, that the first floor of structures in flood zones be constructed above the base flood elevation, or flood-proofed. Similarly, although there are portions of Sharp Park that are within an SFHA, there are no structures planned for these areas. Therefore, the project would result in less than significant impacts from structures within a 100-year flood zone.

This topic will not be discussed in the Environmental Impact Report.

i) The proposed project would have a less than significant impact with regard to exposing people or structures to a significant risk of loss, injury, or death involving flooding. Most of the Natural Areas do not have water bodies and are not located near water bodies. There are no dams near the proposed project sites, and, while India Basin Park has levees that mark the shoreline along San Francisco Bay and proposed activities for Sharp Park include constructing canals to isolate portions of Laguna Salada, none of the proposed management activities (removing nonnative vegetation, implementing erosion control BMPs on the levees, or constructing the canals) would cause failure of levees or expose people or structures to flooding. Because of the distance to structures and residences and the likely force of flow from such a release, the detention basin proposed for

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<sup>70</sup>City and County of San Francisco, Office of the City Administrator, National Flood Insurance Program Flood Sheet, [www.sfgov.org/site/uploadedfiles/risk\\_management/factsheet.pdf](http://www.sfgov.org/site/uploadedfiles/risk_management/factsheet.pdf).

Bayview Park has a small enough capacity (65,000 gallons) that even a failure of the basin and release of the water would have a less than significant impact with regard to this criterion.

The bulk of the proposed activities involve removal of invasive, nonnative trees and other vegetation, with subsequent replacement of vegetation with native and special status species. Vegetation removal will be short term, and while removal of the vegetation might increase water flows in some of the creeks and water bodies in the Natural Areas (Lake Merced, Pine Lake, and Islais Creek in Glen Park), these activities would also have a less than significant impact with regard to this criterion. See additional discussion of flooding under criterion d).

This topic will not be discussed in the Environmental Impact Report.

j) The proposed project would have a less than significant impact with regard to exposing people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow. The City of San Francisco General Plan Community Safety Elements describes tsunamis as follows:

Tsunamis are large waves in the ocean generated by earthquakes, coastal or submarine landslides, or volcanoes. Damaging tsunamis are not common on the California coast. Most California tsunamis are associated with distant earthquakes (most likely those in Alaska or South America), not with local earthquakes. Devastating tsunamis have not occurred in historic times in the Bay Area. Because of the lack of reliable information about the kind of tsunami run-ups that have occurred in the prehistoric past, there is considerable uncertainty over the extent of tsunami run-up that could occur.

India Basin is the only Natural Area that is considered to be within a tsunami hazard zone in San Francisco (CCSF 1997), but the level of risk is expected to be minor. Sharp Park is within a tsunami hazard zone, and the level of risk in that area is also expected to be minor. While the management activities included in the proposed project may result in increased use of the Natural Areas, none of the proposed project activities would increase the likelihood that people or structures would be exposed to a significant risk of loss, injury, or death due to inundation by seiche, tsunami, or mudflow. Therefore, the proposed project has a less than significant impact with regard to this criterion.

This topic will not be discussed in the Environmental Impact Report.

E.15 HAZARDS AND HAZARDOUS MATERIALS

<u>Topics:</u>	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>	<u>Not Applicable</u>
<b>15. HAZARDS AND HAZARDOUS MATERIALS</b>					
<b>Would the project:</b>					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The cleanup and remediation activities for the former rifle range at Sharp Park that are referenced in Recommendation SP-12a are part of a separate process lead by the SFRPD Capital Division; therefore, those activities are not addressed as part of the SNARMP in this Initial Study.

a) Project implementation would require the use of motor vehicles and motorized equipment for the management activities such as tree removal, weeding, erosion control, and trail construction. Additionally, pesticides would be used under the integrated pest management plan. In addition to pesticides,

hazardous materials<sup>71</sup> used during project implementation include fuel, oil, solvents, and lubricants used for equipment maintenance. Hazardous materials would be used in marginal quantities and would be stored off-site. Any activities involving hazardous materials and hazardous waste<sup>72</sup> would be conducted in accordance with strict health and safety standards mandated by the Occupational Safety and Health Administration (OSHA) and included in the integrated pest management plan, reducing the potential hazards to workers, the public, and the environment from the use, transport, and disposal of those materials and wastes. The potential release of these substances to the environment and nearby water bodies is considered a significant impact. The SFRPD would implement Mitigation Measure M-HZ-1, which requires that equipment be refueled at least 100 feet from a water body. It also requires preparation of an emergency response plan for accidental release of hazardous materials, to reduce potential impacts from the transportation, disposal, or release of hazardous materials to less than significant.

This topic will not be discussed in the Environmental Impact Report.

**b)** Hazardous materials would be used as part of the project implementation and integrated pest management plan, and there would be a potential for incidental spill or release of hazardous materials. Considering the scale of the management activities, incidental spills or releases of hazardous materials would be in minor quantities. However, the potential release of these substances to the environment and nearby water bodies is considered a significant impact. The SFRPD would implement Mitigation Measure M-HZ-1 to reduce potential impacts from the incidental spills of hazardous materials to less than significant.

This topic will not be discussed in the Environmental Impact Report.

**c)** There are 45 schools within one-quarter mile of the Natural Areas. Project activities would involve the handling of hazardous materials, such as petroleum products, pesticides, and fertilizers. Although hazardous materials would be used in small quantities and the impact from incidental release would be minor, this would be further reduced with the implementation of the Mitigation Measure M-HZ-1. Potential air pollutant emissions from the proposed project are

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<sup>71</sup>Hazardous materials—defined in Section 25501(h) of the California Health and Safety Code, are materials that, because of their quantity, concentration, or physical or chemical characteristics, pose a substantial present or potential hazard to human health and safety or to the environment if released to the workplace or environment.

<sup>72</sup>Hazardous waste—any material that is relinquished, recycled, or inherently waste-like and falls under Title 22 of the California Code of Regulations, Division 4.5, Chapter 11 contains regulations for the classification of hazardous wastes. A waste is considered a hazardous waste if it is toxic (causes human health effects), ignitable (has the ability to burn), corrosive (causes severe burns or damages materials), or reactive (causes explosions or generates toxic gases) in accordance with the criteria established in Article 3. Article 4 lists specific hazardous wastes, and Article 5 identifies specific waste categories, including hazardous wastes, as defined by the Resource Conservation and Recovery Act (RCRA), non-RCRA hazardous wastes, extremely hazardous wastes, and special wastes.

addressed in Section E.7, Air Quality. To reduce potential impacts from air pollution emissions on sensitive receptors such as schools, the SFRPD would comply, as applicable, with the San Francisco Construction Dust Control Ordinance and Mitigation Measures M-AQ-1 and M-AQ-2, as described in Section E.7. Because of the minimal use of hazardous materials, potential impacts on schools from hazardous materials would be less than significant.

This topic will not be discussed in the Environmental Impact Report.

**d)** The project is not within any sites on the hazardous materials sites list compiled pursuant to State of California Government Code Section 65962.5 (Cortese List), nor is it within one-quarter mile of such a site (DTSC 2008). Therefore, project implementation would not create a hazard to the public or the environment.

This topic will not be discussed in the Environmental Impact Report.

**e, f)** Because the airport closest to the project sites, San Francisco International Airport, is approximately eight miles south of San Francisco and six miles east of Pacifica, these criteria do not apply.

These topics will not be discussed in the Environmental Impact Report.

**g)** Because the project implementation would be inside the boundaries of the Natural Areas, it would not impair implementation of or interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, the project would have no impacts on emergency plans.

This topic will not be discussed in the Environmental Impact Report.

**h)** Most of the Natural Areas are in fire hazard areas that are classified as Urban Unzoned. Glen Canyon Park, Mount Davidson, Bayview Park, and Lake Merced are in areas with a fire hazard severity rating of moderate. Management of the Natural Areas would include removing trees, including those that are diseased and dying, thereby reducing easily combustible fuel loads. Also implementing recommendation GR-13a should reduce the presence of vegetation with high fire hazard ratings, such as dense and aging French broom and eucalyptus. Tree removal would reduce the amount of available fuel for fires. More importantly, timber thinning would increase the space between trees, reducing the ability of a fire to rapidly spread. Additionally, the management activities would result in healthier trees that are less susceptible to stress from drought; healthy trees are less likely to catch fire than dying trees with dead limbs and needles. However, chain saws and other motorized equipment would increase the risk of fire. Natural Areas Program gardeners would carry fire extinguishers in their trucks, and would use appropriate fire prevention and suppression measures for larger scale tree removal. The SFRPD would continue to hold regular meetings with the San Francisco Fire Department and would coordinate management activities,

such as tree removal, with that department. Therefore, implementing the management activities at the Natural Areas would have less than significant impacts on the Natural Areas.

This topic will not be discussed in the Environmental Impact Report.

E.16 MINERAL AND ENERGY RESOURCES

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>16. MINERAL AND ENERGY RESOURCES—</b>					
<b>Would the project:</b>					
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a, b) All land in San Francisco, including the project site, is designated Mineral Resource Zone 4 (MRZ-4) by the California Division of Mines and Geology (CDMG) under the Surface Mining and Reclamation Act of 1975 (CDMG undated). This designation indicates that there is inadequate information available for assignment to any other MRZ, and thus the Natural Areas are not designated areas of significant mineral deposits. Further, implementation of the project would not result in the loss of known mineral resources or affect an important mineral resource recovery site.

These topics will not be discussed in the Environmental Impact Report.

c) During the project implementation phase, fuel (diesel and gasoline) would be consumed by motorized equipment, such as two-stroke engines, and by trucks. Use of these fuels by the project work crews are expected to be minor. Improved Natural Areas may also encourage more local, nonmotorized forms of recreation, potentially resulting in minor reductions in motorized vehicle miles traveled, thus reducing fuel consumption. Use of energy and fuels by the proposed project is expected to be less than significant. Additionally, implementing Improvement Measure I-ME-1 to increase energy efficiency and Mitigation Measure M-AQ-2 to limit idling of diesel-fueled vehicles would lessen this impact.

This topic will not be discussed in the Environmental Impact Report.

E.17 AGRICULTURE RESOURCES

<u>Topics:</u>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>17. AGRICULTURE RESOURCES</b>					
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland.					
<b>Would the project:</b>					
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland of Statewide Importance, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a – c) The project sites are located in the CCSF and Pacifica, which are urban areas and therefore not agricultural in nature. The California Department of Conservation does not designate any land within San Francisco or Pacifica as Williamson Act properties or important farmland.<sup>73</sup> The proposed project would not convert farmland to a nonagricultural use, would not conflict with agricultural zoning or Williamson Act contracts, and would not cause other changes that would lead to the conversion of Farmlands of Statewide Importance<sup>74</sup> to nonagricultural use. Therefore, these criteria are not applicable to the proposed project.

These topics will not be discussed in the Environmental Impact Report.

<sup>73</sup>San Francisco is identified as "Urban and Built-Up Land" on the California Department of Conservation *Important Farmland of California Map, 2004* (California Department of Conservation 2004). This map is available at the Department of Conservation ftp site (<ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/statewide/>).

Pacifica is identified as "Built-Up Land or Incorporated City Land" on the map of San Mateo County Williamson Act 2006. This map is available at the Department of Conservation ftp site ([ftp://ftp.consrv.ca.gov/pub/dlrp/WA/Map%20and%20PDF/San%20Mateo/san\\_mateo\\_2006.pdf](ftp://ftp.consrv.ca.gov/pub/dlrp/WA/Map%20and%20PDF/San%20Mateo/san_mateo_2006.pdf)).

<sup>74</sup>Farmland of Statewide Importance—land other than Prime Farmland that has a good combination of physical and chemical characteristics for crop production.

E.18 MANDATORY FINDINGS OF SIGNIFICANCE

<u>Topics:</u>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>18. MANDATORY FINDINGS OF SIGNIFICANCE—</b>					
<b>Would the project:</b>					
a) Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have impacts that would be individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

In this Initial Study, the Potentially Significant Impact designation is being used solely to identify those topics that will be addressed in detail in the Environmental Impact Report for this project; it does not reflect the findings of any preliminary impact analysis. Those topics are being included in the Environmental Impact Report because there is not sufficient information available at this time on the potentially affected resources or site conditions.

**a)** In the short-term, the proposed project would result in temporary disturbance of upland and aquatic habitat, potentially degrading the quality of that habitat. The proposed project may also affect archaeological and paleontological resources within the Natural Areas. The potential impacts on this topic will be analyzed in the Environmental Impact Report.

**b)** Cumulative impacts will be analyzed in the Environmental Impact Report.

**c)** The proposed project’s impacts on human beings are primarily related to noise, air quality, and hazards and hazardous materials. The potential impacts on this topic will be analyzed in the Environmental Impact Report.

## F. MITIGATION MEASURES AND IMPROVEMENT MEASURES

This section identifies mitigation measures to reduce significant impacts to less than significant levels and improvement measures to further reduce less than significant impacts.

### F.1 MITIGATION MEASURES

The SFRPD would implement the following measures to reduce significant impacts to less than significant levels.

#### M-CP-1

The SFRPD would conduct an architectural field survey of the Natural Areas using a qualified historian or architectural historian. California Department of Parks and Recreation 523A forms would be prepared for any historical architectural resources within the APE that have not been surveyed within five years. Completed 523A forms would be submitted to the CCSF Historic Preservation Division for review and to the California Office of Historic Preservation for inclusion in the California Historic Resource Information Database. Findings of the survey would be reported in a professional survey document that meets the Secretary of the Interior's *Standards for Historical Documentation*. The SFRPD would maintain close coordination with the CCSF Historic Preservation Division staff to ensure all historical architectural resource concerns were addressed. MEA and the SFRPD would adhere to recommendations made in the report, in consultation with the CCSF Historic Preservation Division staff. Avoiding historic architectural resources is the preferred option and may require modifying the proposed activities, for example, to avoid planting new vegetation species that are dissimilar to historic landscapes.

#### M-AQ-1

The BAAQMD has determined that implementation of the following control measures would mitigate PM<sub>10</sub> impacts to a less than significant level. Depending on the level of activities and as applicable, the SFRPD measures to reduce PM<sub>10</sub> impacts at Sharp Park may include the following:

##### **BAAQMD Basic Control Measures**

- Soil, sand, or loose materials transported on the trucks would either be covered or at least two feet of freeboard<sup>75</sup> would be maintained.
- All unpaved access roads, parking areas, and staging areas at the management areas would either be paved, watered three times daily, or nontoxic soil stabilizers would be applied.
- If visible soil material is carried onto adjacent public streets, adjacent streets would be swept daily (with water sweepers).

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<sup>75</sup>Freeboard—the space between the top of the transported materials and the top of the truck that is transporting said materials.

**BAAQMD Enhanced Control Measures (also applies to sites over four acres)**

- As feasible, traffic speeds on unpaved roads would be limited to 15 miles per hour.
- Disturbed areas would be replanted as quickly as possible.

**M-AQ-2**

To limit exhaust emissions, the SFRPD would implement the following BAAQMD exhaust controls, where applicable:

- Limit the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) to five minutes at any location.
- Use low-sulfur fuels in all stationary and mobile equipment.

**M-HZ-1**

To reduce impacts from accidental release of hazardous material, the SFRPD would prepare an emergency response plan for each capital project before the project began. The plan would include emergency procedures for hazardous materials releases. These procedures would include requirements for the necessary personal protective equipment, spill containment procedures, and worker training to respond to accidental spills and releases. The plan would also require equipment to be refueled at least 100 feet from any streams or water bodies. A general emergency response plan also would be prepared to address daily management activities. During the project, all hazardous materials, including any hazardous wastes, would be used, stored, transported, and disposed of in accordance with local, state, and federal hazardous materials regulations.

**F.2 IMPROVEMENT MEASURES**

SFRPD may implement the following measures to further reduce less than significant impacts.

**L-ME-1**

Consistent with the 2005 California Energy Action Plan II priorities for reducing energy use, the SFRPD would ensure that energy-efficient equipment is used to the extent practicable during project implementation.

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## H. GLOSSARY

**A zone**—A FEMA Flood Zone designation for high risk zones, with a 1% annual chance of flooding and a 26% chance of flooding over the life of a 30-year mortgage. Because detailed analyses are not performed for such areas; no depths or base flood elevations are shown within these zones on the FEMA Flood Insurance Rate Map.

**Adaptive management**—A flexible, learning-based approach to managing complex ecosystems.

**Ambient air**—Outside air; any portion of the atmosphere not confined by walls and a roof.

**Ambient noise**—The background noise in an area or environment, being a composite of sounds from many sources near and far.

**Anaerobic process**—A process which only occurs in the absence of molecular oxygen.

**Architectural resource**—The preferred term to refer to a building or structure.

**Attainment**—A designation used when an area meets an air quality standard.

**Basal area**—A measure, typically in square feet per acre, of the area covered by trees within a given urban forest. Basal area is used as an index of tree production.

**Carbon sequestration**—The removal and storage of carbon from the atmosphere in carbon sinks (such as oceans, forests, and soils) through physical or biological processes, such as photosynthesis.

**CEQA area of potential effects (C-APE)**—The geographic area or areas within which the proposed project may directly indirectly cause alterations in the character or use of historical resources, if any such properties exist. The C-APE is influenced by the scale and nature of a proposed project and may be different for different kinds of effects caused by the project. The C-APE is likely to be the location physically inspected for cultural resources.

**Cherry picker**—A maneuverable vertical boom with an open bucket or cage at the end from which a worker can perform aerial work such as pruning trees or repairing electrical lines.

**Chippage**—Flakes resulting from the process of human modification to lithic materials.

**Cultural resource**—A generic term that may be used to refer to architectural resources, archaeological resources, and/or traditional cultural properties.

**Diameter at breast height (dbh)**—A standard means of tree measurement, with the diameter of the trunk measured at breast height, defined as 4.5 feet above the forest floor on the uphill side of the tree.

**Discharge**—The flow of surface water into a stream or canal or the outflow of groundwater from a flowing artesian well, ditch, or spring. Also refers to the discharge of liquid effluent from a facility.

**Ecological restoration**—The process of repairing damage caused by humans to natural systems.

**Ecotone**—A transitional zone between two vegetation communities that contains the characteristic species of each community.

**Escape habitat**—Natural or man-made features that allow animals to avoid predators or other threats.

**Expansive soils**—Soils or rocks characterized by clayey material that shrinks and swells as it dries or becomes wet, respectively. Expansive soils are subject to changes in volume and settlement in response to wetting and drying, often resulting in severe damage to structures.

**Extirpate**—To remove or destroy totally.

### **Farmlands of Significance**

Prime Farmland is land that has the best combination of physical and chemical characteristics for crop production. It has the soil quality, growing season, and moisture supply needed to produce sustained high yields of crops when treated and managed.

Farmland of Statewide Importance is land other than Prime Farmland that has a good combination of physical and chemical characteristics for crop production.

Unique Farmland does not meet the criteria for Prime Farmland or Farmland of Statewide Importance but has been used for the production of specific high-economic-value crops.

Farmland of Local Importance is either currently producing crops or has the capability of production but does not meet the criteria of the categories above.

Grazing Land is land on which the vegetation is suited to the grazing of livestock.

**Floodplain**—Land adjacent to a watercourse over which water flows in times of flood. The limits of the floodplain are defined by the peak level of a 1-in-100-year return period flood.

**Fossil fuel**—A general term for subsurface combustible geologic deposits of organic materials, formed from decayed plants and animals that have been converted to crude oil, coal, natural gas, or heavy oils by exposure to heat and pressure in the Earth's crust over hundreds of millions of years.

**Freeboard**—The space between the top of the transported materials and the top of the truck that is transporting the materials.

**Fugitive dust**—Fugitive emissions generally refer to those emissions that are released to the atmosphere by some means other than through a stack or tailpipe.

**Greenhouse gas**—A gas which traps solar radiation, such as carbon dioxide.

**Ground-Borne vibration**—The noise that is manifested inside a building or structure as a result of vibrations produced by a source located outside the building (and its foundations) and transmitted as vibration through the ground between the source and the building.

**Groundwater recharge**—Inflow to aquifers from precipitation, infiltration, through-flow, or other means that replaces groundwater lost through pumping or other forms of discharge. The process of water being added to the saturated zone *or* the volume of water added by this process.

**Hazardous materials**—Defined in Section 25501(h) of the California Health and Safety Code, are materials that, because of their quantity, concentration, or physical or chemical characteristics, pose a substantial present or potential hazard to human health and safety or to the environment if released to the workplace or environment.

**Hazardous waste**—Any material that is relinquished, recycled, or inherently waste-like and falls under Title 22 of the California Code of Regulations, Division 4.5, Chapter 11 contains regulations for the classification of hazardous wastes. A waste is considered a hazardous waste if it is toxic (causes human health effects), ignitable (has the ability to burn), corrosive (causes severe burns or damages materials), or reactive (causes explosions or generates toxic gases) in accordance with the criteria established in Article 3. Article 4 lists specific hazardous wastes, and Article 5 identifies specific waste categories, including hazardous wastes, as defined by the Resource Conservation and Recovery Act (RCRA), non-RCRA hazardous wastes, extremely hazardous wastes, and special wastes.

**Herbaceous**—Having the texture, color, and other characteristics of an ordinary foliage leaf. Herbaceous vegetation is not woody.

**Historic landscape**—Landscapes or areas that are either 1) associated with an event or series of events of historical note; or 2) represent the visual perception of a particular period of civilization, a way of life, or patterns of living.

**Historic resource**—An ambiguous term that is sometimes used to refer to architectural resources or archaeological resources of the historic era.

**Historical resource**—Any property that is either listed in or eligible for listing in the California Register of Historical Resources.

**Hydrology**—The science that deals with the waters above and below land surfaces; their occurrence, circulation, and distribution, both in time and space; their biological, chemical, and physical properties; and their reaction with their environment, including their relation to living beings.

**Integrated pest management**—The use of multiple treatment methods to control undesirable weeds and other pests.

**Integrity (archaeological or architectural)**—A resource's "intactness" and the extent to which it resembles its original form.

**Lateral Spreading**—landslides that commonly form on gentle slopes and that have rapid fluid-like flow movement, like water.

**Liquefaction**—The process of changing soil and unconsolidated sediments into water mixture immediately following an earthquake; often results in foundation failure, with sliding of the ground under buildings and structures.

**Neotropical migrant**—A bird that breeds in North America and spends the nonbreeding season in warmer climates, often in Central and South America.

**Paleontological resource**—Fossilized remains or traces of animals, plants, and invertebrates, including their imprints, from a previous geological period.

**Particulate matter**—Tiny solid or liquid particles, generally soot and aerosols.

**Passive recreation**—Recreational activities that occur in a natural setting and that require minimal site development or facilities. Under passive recreation, the importance of the environment or setting for the activities is greater than in developed or active recreation settings.

**Pathogen**—A disease-causing agent, especially a living microorganism such as a bacterium or fungus.

**Riparian**—land next to a natural watercourse such as a river or stream. Riparian areas support vegetation that provides important wildlife habitat, as well as important fish habitat when it overhangs the bank.

**Rookery**—Colony or aggregation of animals of the same species.

**Roosting habitat**—Natural or man-made features on which birds perch to rest or sleep.

**Sacred site**—Locality of traditional significance or importance to a Native American community.

**Scenic highway**—A highway from which a high quality scenic natural landscape can be seen by travelers and with little intrusion by development.

**Scenic resource**—The visible physical features on a landscape.

**Scenic vista**—A visually appealing distant view.

**Scrub**—Low trees or shrubs collectively.

**Sediment Load**—The total quantity of sediment, as measured by dry weight or volume, that moves past a site during a given time.

**Sedimentation**—The deposition of material suspended in a stream system, whether in suspension (suspended load) or on the bottom (bedload).

**Sensitive receptor**—People or institutions with people that are particularly susceptible to illness from environmental pollution, such as the elderly, very young children, people already weakened by illness (e.g., asthmatics), and persons engaged in strenuous exercise.

**Sensitive species**—Species that are listed on the California Native Plant Society plant list or *Inventory of Rare and Endangered Vascular Plants*.

**Siltation**—Sediment influx from either erosion or from sediment carried into a water body by inflowing rivers and tributaries.

**Social trail**—An undesignated, user-developed pathway that has developed through use of a Natural Area.

**Special status species**—Species that are accorded special status because of their recognized rarity or vulnerability to habitat loss or population decline. Some of these species receive specific protection in federal or state endangered species legislation. Others have been designated sensitive species or species of special concern on the basis of adopted policies of federal, state, or local resource agencies. These species are referred to collectively as special-status species.

**Subsidence**—A lowering of the land surface in response to subsurface weathering, collapse or slow settlement of underground mines, or the production of subsurface fluids such as ground water or oil.

**Suspended particulates (PM<sub>10</sub> and PM<sub>2.5</sub>)**—Particulate matter is a class of air pollutants that consists of solid and liquid airborne particles in an extremely small size range. Particulate matter is measured in two size ranges: PM<sub>10</sub> for particles less than 10 microns in diameter, and PM<sub>2.5</sub> for particles less than 2.5 microns in diameter.

**Topsoil**—Surface soil usually including the organic layer in which plants have most of their roots and which a farmer turns over in plowing.

**Understory**—The shrubs and plants growing beneath the main canopy of a forest or stand of trees.

**Unique archaeological resource**—An archaeological property that meets the criteria listed in Section 21083.2 of the California Public Resources Code. An archaeological artifact, object, or site about which it can be clearly demonstrated that without merely adding to the current body of knowledge there is a high probability that it meets one of a set of criteria.

**Urban forest**—A significant stand of nonindigenous trees.

**V zones**—A FEMA Flood Zone designation for high risk zones that consist of coastal areas with a 1% or greater chance of flooding and an additional hazard associated with storm waves. These areas have a 26% chance of flooding over the life of a 30-year mortgage. No base flood elevations are shown within these zones on the FEMA Flood Insurance Rate Map.

**Viewshed**—The landscape that can be directly seen under favorable atmospheric conditions, from a viewpoint or along a transportation corridor.

**Wetland**—A zone periodically or continuously submerged or having high soil moisture, which has aquatic or riparian vegetation components and is maintained by water supplies significantly in excess of those otherwise available through local precipitation.

**Williamson Act**—Also known as the Land Conservation Act of 1965, this act provides for lowered property taxes for lands maintained in agricultural and certain open space uses. Under a Williamson Act contract, generally the landowner agrees to limit the use of the land to agriculture and compatible uses for a period of at least 10 years. In return, the land is taxed at a rate based on the agricultural production of the land, rather than its real estate market value.

**Windthrow**—The effects of wind on a stand of trees.

**Wind-toughened edge trees**—Trees in a stand that have become tough or resistant to the wind.

**I. DETERMINATION**

On the basis of this initial study:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, no further environmental documentation is required.



Bill Wycko  
Environmental Review Officer  
for  
John Rahaim  
Director of Planning

DATE April 20, 2009

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# **SCOPING REPORT**

**for**

**San Francisco Natural Areas Management Plan  
Environmental Analysis Services**

**Contract No. #4043-06/07**

**November 2009**

Prepared for:

**San Francisco Recreation and Park Department**

**And**

**San Francisco Planning Department, Major Environmental Analysis**

Prepared by:

**Tetra Tech, Inc.  
San Francisco, California**

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- A Scoping Notices
- B Scoping Meeting Materials
- C Scoping Meeting Transcripts
- D Written Scoping Comments

# SECTION 1

## INTRODUCTION AND SCOPING OVERVIEW

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The San Francisco Planning Department is the lead agency for implementing California Environmental Quality Act (CEQA) requirements for all projects sponsored by the City and County of San Francisco or conducted within San Francisco. The San Francisco Planning Department is preparing an Environmental Impact Report (EIR) to evaluate the environmental and socioeconomic effects of implementing the San Francisco Recreation and Park Department's (SFRPD) Significant Natural Resource Areas Management Plan (SNRAMP).

As part of the EIR process, the San Francisco Planning Department undertook a scoping process from April 22 to May 26, 2009. This report includes a description of the scoping process and a summary of the public and regulatory agencies' comments received during scoping.

### 1.1 PROJECT DESCRIPTION AND LOCATION

Fragments of unique plant and animal habitats within the City and County of San Francisco have been preserved within parks known as Significant Natural Resource Areas (hereon referred to as Natural Areas). In the late 1990s, SFRPD developed the Natural Areas Program to protect and manage these Natural Areas for the natural and human values they provide. The Natural Areas Program mission is to preserve, restore, and enhance remnant Natural Areas and to promote environmental stewardship of them.

Over the course of several years, SFRPD developed the SNRAMP. The draft final plan, published in February 2006, contains detailed information on the biology, geology, and trails within 31 Natural Areas. Thirty of those Natural Areas are in San Francisco, and one is in Pacifica (Sharp Park). The plan is intended to guide natural resource protection, habitat restoration, trail and access improvements, other capital projects, and maintenance activities over the next 20 years.

### 1.2 NOTICE OF PREPARATION

On April 22, 2009, the San Francisco Planning Department issued a Notice of Preparation (NOP) (see Appendix A) and distributed an Initial Study (IS) to provide more detailed information on the proposed project and the issues to be considered in the EIR. Forty-five copies of the NOP/IS were sent to interested parties. An Environmental Review Notice (see Appendix A) associated with the NOP was published in the *San Francisco Examiner* and *Pacifica Tribune* on April 22, 2009. The NOP

Notice of Availability (NOP NOA) (see Appendix A) was sent to over 2,400 interested parties. The California State Clearinghouse assigned the project the number 2009042102.

### **1.3 SCOPING MEETINGS**

The San Francisco Planning Department held a public scoping meeting on May 12 and May 14, 2009, to solicit input from the public on the appropriate scope of the EIR, mitigation measures, and potential alternatives to the SNRAMP. The May 12 meeting was held in the County Fair Building Auditorium in Golden Gate Park, San Francisco, and was attended by 33 individuals. On May 14, the meeting was held at the Pedro Point Firehouse in Pacifica and was attended by 54 individuals.

The meetings included a presentation on the proposed project and the environmental review process, followed by a formal public comment period. Copies of the meeting materials are presented in Appendix B; transcripts of the meetings are provided in Appendix C.

### **1.4 WRITTEN COMMENTS**

Throughout the scoping process, 45 sets of scoping comments were received. These comments are summarized in Section 2 and are reproduced in Appendix D.

# SECTION 2

## SCOPING COMMENTS

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This section briefly summarizes the received comments and includes recommendations for addressing the comments in the EIR.

### 2.1 SHARP PARK GOLF COURSE

#### Comments

- The golf course is not harming the frogs. The number of frogs should have increased as result of ceasing pumping of ponded water and ceasing application of pesticides a few years back. (George Ambrosio)
- Will the EIR be used to satisfy CEQA review requirements for the Sharp Park Golf Course plan? (San Francisco Public Golf Alliance)
- Will the Sharp Park Golf Course plan be subject to an EIR under CEQA? If so, when? (San Francisco Public Golf Alliance)
- What permits and permitting agencies would be involved in a change of use at Sharp Park Golf Course? (San Francisco Public Golf Alliance)
- To what extent at Laguna Salada, Horse Stable Pond, and their associated wetlands created, recharged, or enhanced by irrigation at Sharp Park Golf Course? (San Francisco Public Golf Alliance)
- Over the past five years, what is the monthly volume of irrigation water used at Sharp Park Golf Course (in gallons)? (San Francisco Public Golf Alliance)
- Over the past five years, what is the monthly volume of Sharp Park Golf Course irrigation water that enters the ponds and their associated wetlands (in gallons)? (San Francisco Public Golf Alliance)
- How would complete cessation of irrigation at Sharp Park Golf Course affect the habitat of the California red-legged frog? What are the effects in low-rainfall months vs. high-rainfall months? (San Francisco Public Golf Alliance)

- How would reduced irrigation at Sharp Park Golf Course affect the habitat of the California red-legged frog? What are the effects in low-rainfall months vs. high-rainfall months? (San Francisco Public Golf Alliance)
- How would complete cessation of irrigation at Sharp Park Golf Course affect the habitat of the San Francisco garter snake? What are the effects in low-rainfall months vs. high-rainfall months? (San Francisco Public Golf Alliance)
- How would reduced irrigation at Sharp Park Golf Course affect the habitat of the San Francisco garter snake? What are the effects in low-rainfall months vs. high-rainfall months? (San Francisco Public Golf Alliance)
- How would complete cessation of irrigation at Sharp Park Golf Course affect the salinity of Laguna Salada, Horse Stable Pond, and their associated wetlands? (San Francisco Public Golf Alliance)
- How would reduced irrigation at Sharp Park Golf Course affect salinity of Laguna Salada, Horse Stable Pond, and their associated wetlands? What are the effects in low-rainfall months vs. high-rainfall months? (San Francisco Public Golf Alliance)
- What effect does groundwater generated by Sharp Park Golf Course irrigation have on the hydrostatic pressure affecting the seawall? How would complete cessation of irrigation at Sharp Park Golf Course affect the strength and/or integrity of the seawall? How would reduced irrigation at Sharp Park Golf Course affect the strength and/or integrity of the seawall? What are the effects in low-rainfall months vs. high-rainfall months? (San Francisco Public Golf Alliance)
- How is the habitat for the California red-legged frog affected by the continued existence of the seawall? (San Francisco Public Golf Alliance)
- What is the current structural condition of the seawall? Its useful life expectancy? At what point will it need to be repaired or replaced to protect the freshwater habitat of the California red-legged frog? (San Francisco Public Golf Alliance)
- Would replacing the Sharp Park Golf Course fairways with freshwater ponds increase flood dangers to residential neighborhoods north and south of the golf course in the event of storm surges that overtop the seawall? (San Francisco Public Golf Alliance)
- Would replacing the Sharp Park Golf Course fairways with freshwater ponds increase the breeding habitat for mosquitoes? If so, what measures would be necessary to protect residential neighborhoods north and south of the golf course from West Nile Virus? (San Francisco Public Golf Alliance)
- As of May 2009, what aerial spraying is permitted by law for control of mosquito larvae and adults? What aerial spraying is conducted at Sharp Park for control of mosquito larvae and adults, including timing and seasonality? Describe any other mosquito control measures used at Sharp Park. What is the effect of mosquito control measures on the California red-legged frog population? What is the effect of mosquito control measures on residential neighbors of Sharp Park? (San Francisco Public Golf Alliance)
- Would closure and regrading of the Sharp Park Golf Course to create new freshwater ponds and wetlands affect habitat for the California red-legged frog or San Francisco garter snake? Would these actions require take permits from the US Fish and Wildlife Service and the California

- Department of Fish and Game? How likely is it that these agencies would grant such permits? (San Francisco Public Golf Alliance)
- What would be the source of water for the proposed freshwater ponds and wetlands at Sharp Park? (San Francisco Public Golf Alliance)
  - If the Sharp Park Golf Course is closed or reduced in size, would San Francisco still purchase water from Pacifica's Calera Creek Water Recycling Plant? (San Francisco Public Golf Alliance)
  - The Sharp Park Golf Course should be recognized as a significant historic architectural and cultural resource in the EIR. (San Francisco Public Golf Alliance)
  - How would closure of the Sharp Park Golf Course affect its recreational users? (San Francisco Public Golf Alliance)
  - If anything less than the full 18-hole golf course at Sharp Park is retained, the economic and environmental impact on my family will be great. We'll need to ferry Andrew to HMB or elsewhere to play his golf. Others will be similarly impacted. Please don't take away my golf course. (Laurie Frater)
  - So as far as Sharp Park goes, I think it just needs to be dredged, cleaned out, let those frogs and snakes do their thing, allow the golfers to go around it as it has for last 70 years. (Reiner Binsfeld)
  - I see no reason why we just can't coexist down at Sharp Park. (Reiner Binsfeld)
  - The Sharp Park Golf Course can be retained and preserved while the environment is simultaneously enhanced. (San Francisco Public Golf Alliance)
  - As Sharp Park's owner, San Francisco has a stewardship obligation to the golf course, an international masterwork. (San Francisco Public Golf Alliance)
  - Maintain all of the remaining Alister McKenzie golf holes at Sharp Park. (San Francisco Public Golf Alliance)
  - The easiest solutions can also be the cheapest: dredge and direct water if you're trying to save a species. Keep the golf course intact, keep the history intact. And do minimal amount of impact to the environment. (Steve Rush)
  - Planning commission should look into thinning the reeds that are choking the lagoon, which would give the water more area and prevent overflowing in the golf course. This would protect the flow and keep the course playable during the wet season and enhance revenue actually for the course. (George Ambrosio)
  - Is there any consideration if SFRPD is not interested in maintaining an 18-hole course in Pacifica, would they consider selling it or doing a long-term lease to the City of Pacifica so we could have some economics in the town of Pacifica? (Chuck Egiziano)
  - Consider the possible partnerships with the City of Pacifica on the golf course. (Mike Pacelli)
  - Keep the Golden Gate National Recreation Area out of Sharp Park. (Mitch Monroe)
  - Alternatives should include leaving, modifying, or removing the Sharp Park golf course to best ensure recovery of the San Francisco garter snake and California red-legged frog. (California Native Plant Society, Yerba Buena Chapter)

- We need the maximum alternative in Sharp Park, and I think that would be a no-golf alternative. (California Native Plant Society, Yerba Buena Chapter)
- Since it was made known that public overflow of water off the course was detrimental to the frogs and the—the pesticides we’re using, this has been stopped over the last two or three years. I’m sure the frogs are increasing. If they’re not, it’s not because of the golf course. (George Ambrosio)
- The land at Sharp Park was donated San Francisco for recreational purposes by the Murphy family and others, and I think it should continue that way. (Jack Rauch)
- Consider the impact of the decrease of golfers visiting West Sharp Park and the area, and the potential economic impact to the City of Pacifica and the impact of a loss of a public golf course serving northern San Mateo County’s recreation needs as well that of San Francisco’s? (Rabine Runneals)
- Consider the economic impacts of both golf and other recreational uses into the City of Pacifica. (Mike Pacelli)
- Look at how much the golf course contributes to Pacifica’s economy. (Steve Sinai)
- From the socioeconomic standpoint, I think it is important that Sharp Park be kept as it is for the general community. (Allan Eisenberg)
- Would replacing the Sharp Park Golf Course fairways with freshwater ponds increase the breeding habitat for mosquitoes? If so, what measures would be necessary to protect residential neighborhoods north and south of the golf course from West Nile Virus? (San Francisco Public Golf Alliance)
- Sharp Park is designed by one of the most famous golf course architects in the world, Alister MacKenzie, one of only four architects in the Golf Hall of Fame. Would be tragic and criminal to destroy one of San Francisco’s finest athletic recreation venues unnecessarily. (George Ambrosio)
- Consider the impact of the loss of a golf course, which is a historical attraction to the City of Pacifica also, and how that would affect and tie into the City of Pacifica’s current efforts to take the Palmetto Avenue business district and emphasize upon the historic characteristics of that neighborhood and develop that into Pacifica’s historical district, which is a current plan being developed in Pacifica here. And all of the historical references that Pacifica is attempting to draw upon for the work done in this neighborhood is all linked to the golf course and everything that the City had in that neighborhood, which is the original downtown, prior to the City’s incorporation. (Rabine Runneals)
- How would closure of the Sharp Park Golf Course affect its recreational users? (San Francisco Public Golf Alliance)
- There are nine golf courses in San Francisco; there is one in Pacifica. And this is their community venue. It’s the only place you can go and have a banquet just about in the entire city. Yes, you need to work to restore habitat. I believe that. Any solution to this that doesn’t include golf, lacks vision. (Tony Belway)
- Keep golf in Sharp Park. There needs to be a lot of different uses in that park, more than just native plants. (Nancy Stafford)

- The deed transferring Sharp Park to San Francisco will be voided if the golf course is destroyed to create wetlands habitat. Any court reviewing those documents would find the proposed property change in violation of the transfer documents, and therefore Sharp Park would revert to the State of California. (Suzanne Valente)
- Recommend that measures around the most environmentally sensitive Sharp Park Golf Course areas (holes 12-15) consider creating native plant/no-golf areas surrounding “island” greens, relocating portions of the holes, incorporating raised causeways, restricting golf cart use, raising fairways, and temporarily closing fairways. (San Francisco Public Golf Alliance)

### **EIR Recommendations**

Because redesigning or eliminating the Sharp Park Golf Course is a separate proposal being studied by SFRPD, it will not be included or evaluated as part of the proposed SNRAMP project analyzed in the EIR. Should changes to the Sharp Park Golf Course be proposed, they would undergo a separate regulatory review, including CEQA environmental review.

## **2.2 GENERAL PROJECT**

### **Comments**

- New areas should not be opened up for trail use; existing trails should be improved or closed. (Nature in the City)
- The plan should be revised to change the beginning of the nesting season from April 1 to February 15 (through July 15). The plan’s practices for nesting birds should be applied to the February 15 to July 15 nesting season. Vegetation removal between January 1 and February 15 or July 15 to September 1 should be preceded by surveys for nests and nesting activity. (Golden Gate Audubon Society)
- Regarding GR-6b and c, nest boxes for cavity-nesting birds may be appropriate for woodlands with large trees, but would not be for other Natural Areas. Nest boxes should not be used to enhance nesting for nonnative species. (Golden Gate Audubon Society)
- Tree removal as described under GR-15c is not consistent with the leaving of snags and dead branches under GR-6a. This should be resolved and alternatives to guide the treatment of snags and standing dead trees should be addressed in the EIR. (Golden Gate Audubon Society)
- Regarding A5.15, India Basin Shoreline supports a large and multispecies collection of waterfowl from fall through spring. (Golden Gate Audubon Society)
- Regarding A5.18, Great Blue Herons should also be mentioned in this section. (Golden Gate Audubon Society)
- Regarding PL-2a, this measure should apply to all Natural Areas and include great horned owl, Western screech owl, and barn owl nests. (Golden Gate Audubon Society)
- The Natural Areas Management Plan and the EIR should acknowledge and be consistent with all approved San Francisco resolutions related to this project, including Resolution Number 0608-012 (and the two amendments addressing MA-3 areas and feral cats) and Resolution Number 0608-013. (Nancy Wuerfel)

- Request adding to the SNRAMP the recommendations approved by the Recreation and Park Commission on August 21, 2006, to Resolution Number 0608-012, which states “that where appropriate in the plan that feral cat relocation shall be implemented only upon a determination by the Commission that other methods of population reduction failed to adequately reduce cat populations in natural areas.” (Society for the Prevention of Cruelty to Animals San Francisco)
- MA-3 areas should be treated in a manner similar to MA-2 areas. (Marnie Dunsmore)
- Discard the MA-1, MA-2, MA-3 approach to the SNRAMP. (Nature in the City)
- Our natural areas should be managed in a coherent and consistent plan for wildlife, rare plants, and ecosystem processes. The areas are already fragmented between different agencies or institutions. Further fragmentation by designing portions MA-1, MA-2, and MA-3, and allowing fewer restrictions on MA-3 will only speed up the destruction of what’s left. (Nancy Rosenthal)
- If the Natural Areas Program does not embrace our forests, then cut them loose. Take them out of the natural areas. Let them be guided by the Urban Forestry Department or a division within SFRPD. (Nancy Wuerfel)
- MA-3 areas should be managed by the Natural Areas Program, not by the Bureau of Urban Forests. (Marnie Dunsmore)
- Regarding GR-15b, replant MA-3 areas with Bay Area native coast live oak savannah trees, rather than eucalyptus, Monterey pine, and Monterey cypress. (Marnie Dunsmore)
- Native grasslands, rather than eucalyptus and other trees, should be the focus of efforts to maximize carbon sequestration. (Marnie Dunsmore)
- The management plan should include development of a trail plan that interconnects Natural Areas where possible, connects Natural Areas to public transit, and maps walking routes through open spaces, parks, and urban areas. Suggested trails could connect Glen Canyon Park to Twin Peaks or to Walter Haas Park and Billy Goat Hill. (Marnie Dunsmore)
- Further evaluate the environmental impact of off-leash dog use. Natural areas cover only 27 percent of park lands. There should be room in the other 73 percent of some dog play areas. (Nancy Rosenthal)
- There is no scientific consensus to support the basic premise behind the GR-8 recommendations. (San Francisco Dog Owners Group)
- Allowing dog access to Natural Areas should be reassessed because dogs are rarely on leash and diminish the Natural Area experience. Dog play areas in Natural Areas should be reconsidered because of the lack of dog control and environmental impacts. (Marnie Dunsmore)
- Ninety percent of the off-leash dog areas in San Francisco are in the natural areas. We need to reduce some of the off-leash dog areas. (Greg Gaar)
- Sharp Park was donated to San Francisco for recreational purposes, and I’m glad to see that. I’d like to see that as a foremost consideration. (Jack Rauch)
- Somebody said 90 percent of the dog play areas on SFRPD land are in Natural Areas, and what the hell is this program for? We’re supposed to be preserving our heritage, our natural heritage, and yet we’re letting this stuff go on. (California Native Plant Society, Yerba Buena Chapter)

- The modification or loss of existing off-leash areas is not acceptable unless you're going to identify replacement property. (Nancy Stafford)
- Because they created the problem, the Army Corps of Engineers should fix the flooding problems at Laguna Salada. The creek at the north end of Laguna Salada should be redirected to empty into the ocean. Sanchez Creek, at the south end of Laguna Salada, should be redirected to the north end of Mori Point to benefit frogs and snakes. (Frankie Franck)
- Add bicycle trails, single-track trails, and bicycle skills areas to the trail plans for the Natural Areas. (Mitch Monroe)
- The plan should include thinning the reeds that choke Laguna Salada, which would prevent overflow on the golf course, benefiting the frogs and the course. (George Ambrosio)
- The cost of tree removal at Mount Davidson would divert limited resources from the basic maintenance of the park, degrading the public experience. (Miraloma Park Improvement Club)
- Tree removal and trail closure should be mitigated through documentation of all trees removed or felled by storms, removal of any downed trees, quarterly removal of poison oak within 10 feet of trails, maintenance and protection of Works Progress Administration trails and retaining walls, and prohibiting any Natural Areas Program activities that restrict public use or access to Mount Davidson for more than 30 consecutive days. (Miraloma Park Improvement Club)
- Alternatives that cause take of fully protected species are not feasible and cannot be assessed under CEQA; only alternatives that reduce take to zero with reasonable certainty may be assessed as feasible alternatives under CEQA. (Brent Plater)
- Restoration planning for Laguna Salada must consider the effects of climate change and likely modification of the seawall. (Brent Plater)
- A restoration proposal that creates a community-centered model of natural flood control, outdoor recreation, environmental education, and endangered species recovery has been developed and must be considered a feasible alternative in the EIR. (Brent Plater)
- The project cannot consider closing the Lake Merced dog play area (LM-7a) because the SF Recreation and Park Department made this an official off-leash area years ago and promised it to the dog-owning community. Monitoring and mitigation can be proposed, but closure cannot because it was not mentioned in the Management Plan. (San Francisco Dog Owners Group)
- The Management Plan has already been heavily compromised. (Greg Gaar)
- The Natural Areas Program is responsible for 31 natural areas, and the EIR should weigh the values of restoring the areas for maximum biodiversity enhancement, and the effect of this enhancement on the citizens, who have little chance to be exposed to other biological riches. All the natural areas within the City of San Francisco should be evaluated for their natural assets. (California Native Plant Society, Yerba Buena Chapter)
- The Natural Areas falling under Management Area-3 should not be separated from the Management Areas-1 and -2, as suggested by one commissioner. The lands under Management Area-3 are interwoven with Management Areas-1 and -2 and separating them would create administrative confusion. (California Native Plant Society, Yerba Buena Chapter)

- The impacts on Sharp Park should be analyzed separately and not as part of other public lands that lie within the City and County of San Francisco borders and land use authority. (Sierra Club Loma Prieta Chapter)
- The tri-level designation of the Natural Areas as Management Areas-1, -2, and -3 undermines the mandate of Natural Areas to regulate, restore, and steward these places and could result in a fragmented management. (Robert Bakewell)
- The cats indoors program from the American Bird Conservancy is not approved by the San Francisco Society for the Protection of Cruelty to Animals, as it is indicated in GR-7b. (Martha Hoffman)
- There is no feral cat control policy stated in the Quail Recovery Plan, as indicated in GR-7a. Any control program must be developed in coordination with San Francisco Society for the Protection of Cruelty to Animals. (L-Danyielle Yacobucci; Society for the Protection of Cruelty to Animals San Francisco)
- GR-7 continues to be very flawed and should either be removed or completely revised, in cooperation with San Francisco Animal Care and Control and San Francisco Society for the Protection of Cruelty to Animals. Alley Cat Allies (alleycat.org) should be consulted as a resource regarding feral cats. (Martha Hoffman; L-Danyielle Yacobucci; Susan Wheeler)
- There have been no scientific studies to determine the impacts of feral cats or any other predator in San Francisco natural areas. It is unacceptable to say that predators, including feral cats, play a major role, much less an “urgent” role, impacting wildlife in San Francisco parks and open spaces. (Society for the Protection of Cruelty to Animals San Francisco; L-Danyielle Yacobucci)
- Eliminating the release of cats into the wild, as indicated in GR-7b, is unrealistic. The trap-neuter-return programs, coupled with the adoption of tame cats and kittens, will decrease the population of feral cats. (Society for the Protection of Cruelty to Animals San Francisco)
- The language in GR-7c that states “minimal suffering and harm” is too subjective to be protective of animals and must be removed from the General Recommendations. (Society for the Protection of Cruelty to Animals San Francisco)
- Identify and prove the scientific measures that would be used to determine if a predator is negatively impacting a natural area. (Society for the Protection of Cruelty to Animals San Francisco)
- The proposed project is experimental and the results are unpredictable. (Morley Singer)
- The Natural Areas Program should address public safety issues in detail at every park, especially at Sharp Park. (Suzanne Valente)
- Restrictions on off-leash dogs must be enforced in natural areas and other groomed areas. (Golden Gate Audubon Society)
- I’m concerned that there be any further compromises with regards to the number of areas within the environmental review. I would hope at the end of the environmental review, we would continue to have 32 areas for consideration and for inclusion in the Natural Areas Program. (Pat Swain)

- There have been a lot of compromises made in the course of developing the master plan, and I'm hoping at this point, as you move forward, you'll try to hold yourself to that document as much as possible. (Pat Swain)
- Many of the project questions are a result of the very powerful mistrust that the neighbors have of the Natural Areas Program and skepticism of the Planning Department. We've had previous battles with the Natural Areas Program over the past 10 years, and they've demonstrated a striking indifference and callousness to neighborhood interests, to try to cut down all the trees on Tank Hill, and some years ago, trying to cut down all the trees—all the trees in Sutro Forest. (Morley Singer)
- While I think saving native plants is very important, and I support the program, I think the program is too large to be successful. I don't think it's cost-effective or practical in its current situation. One-third of park land is a lot to take away from such a large urban area. (Nancy Stafford)
- Find middle ground, instead of chopping down all the trees and replacing them all with natives. (Ethan Elias)
- Provide information on public education for plan. (L-Danyielle Yacobucci)
- I do support this plan. I don't support the scope, and I would support it if this program was more amenable to working with the neighbors and the public. (L-Danyielle Yacobucci)
- Protect the lagoon area. Remove a couple of golf holes roaming around. Focus on pulling golf away from that lagoon. And also I'd like to see some emphasis on the creek. It's a beautiful creek. It's been channelized over the years, and it was been negatively impacted when they developed the golf course. There are a lot of trees that create kind of a dead zone: eucalyptus, pine, and cypress. I would like to see you guys look at possibly some fixing up the creek, too, that Sanchez Creek. (Ron Maykel)
- We have a ton of trails here in Pacifica. When the tunnel comes in, that whole area is going to open up into trails. (Reiner Binsfeld)
- There's a big volunteer component. So in my experience with what goes on in the Oak Woodlands in Golden Gate Park, there's a big feedback that takes place between the community, school kids, environmentalists, stakeholders of all kinds, and the natural areas staff. So it's not only an adversarial situation. There isn't—there isn't some big hand coming down and telling us what to do, when to do it and how to do it. There's a lot of feedback. There's a lot of community participation. (Rob Bakewell)
- So as far as Sharp Park goes, I think it just needs to be dredged, cleaned out, let those frogs and snakes do their thing, allow the golfers to go around it as it has for last 70 years. (Reiner Binsfeld)
- People say the golfers are predators of the frogs and snakes, but really it's more like the raccoons, 'possums, and red-tailed hawks. (Daniel Lim)
- Stop using the word restore and substitute the word preserve. We already have something good. Let's just preserve what we have. (Dave Diller)
- I hear the argument about using this location for children environmental education, but this lagoon has a large area to the south of the course that is easily accessible to the public for this cause. But I see it hardly ever used by the public. There is plenty of open space area surrounding

- the golf course and Mori Point, hiking, nature studies, et cetera. Not like the golf course is in the middle of urban San Francisco. (George Ambrosio)
- The Planning Commission should look into thinning the reeds that are choking the lagoon, which would give the water more area and prevent overflowing in the golf course. This would protect the flow and keep the course playable during the wet season and enhance revenue actually for the course. (George Ambrosio)
  - The plan for Sharp Park is the worst of any of the San Francisco park system. It is clearly in violation of the mission statement. They do not take into consideration public safety, which includes West Nile Virus and the need to control mosquitoes, and the recent ruling by the court indicates that they no longer can spray pesticides to control adult mosquitoes. They can only drop larvicide. Clearly we cannot ensure that the public will be safe if you expand the wetlands. (Suzanne Valente)
  - It's important to link that lower area, like, particularly the archery range and also where the shooting range is, that you guys clean that up, up to the upper ridges so that you can access the southern parts of Pacifica. (Mitch Monroe)
  - You guys talked about volunteerism, the stewardship was part of this plan, and a group I represent is called San Francisco Urban Riders, and we've merged with Craig Dawson Mount Sutro, and we logged over 500 collected hours—man hours of volunteerism. And we plan to do a lot more. So if you guys do end up getting a project up there and want to open up a multi-use trail that's a bicycle lane, I think you'll have a lot of manpower to help get that done, and you won't have to pay for labor. (Mitch Monroe)
  - The alternatives analysis should include two or three alternatives in addition to the no project alternative. Other alternatives should consider retaining all 18 holes of Sharp Park Golf Course, installing environmental sensitive habitat areas and educational panels along existing trails, and restoring temporary wetlands to prevent them from drying before tadpoles develop into adults. (Todd M. Bray)
  - Include in the analysis the spread impact of certain trees, such as the Tasmanian blue gum, and the possibility of removing all the weed (nonnative) trees. (California Native Plant Society, Yerba Buena Chapter)
  - Consider avoiding construction of new trails and soil disturbance where native plants exist. (California Native Plant Society, Yerba Buena Chapter)
  - The decision to convert existing forest adjacent to neighboring homes to a sensitive plant museum has been made without proper scientific study or input from residents. Studies prepared by forest experts are needed to assess the impacts of forest conversion. (Denise Lapins)
  - The environmental must include an alternative that analyzes the full ecological restoration of Sharp Park. The City and County of San Francisco should select the full ecological restoration alternative for Sharp Park in order to provide suitable habitat for listed species at the site and avoid legal liability to San Francisco for illegal "take" of listed species. The full ecological alternative should prioritize endangered species protection and recovery, natural flood control, outdoor recreation, and sustainable land use. The full ecological alternative should include elimination of the golf course holes that are incompatible with maximizing suitable habitat for listed and sensitive species at Sharp Park; elimination of all lawn-mowing activities and restriction

of the use of pesticides that would impact the San Francisco garter snake and the California red-legged frog; inclusion of buffer areas to prevent runoff of pesticides into aquatic habitats; ceasing all use of inorganic fertilizers and monitoring the extent of pollution from the use of nitrogen and phosphorous; ceasing existing animal burrow management policies; restriction or ceasing at a minimum between September 1 and May 31 all water pumping at Horse Stable Pond; creation of basking and hibernating/estivating habitat for the snake, frog, and western pond turtle within Laguna Salada, Horse Stable Pond, and Arrowhead Lake; controlling invasive species in Laguna Salada, Horse Stable Pond, and Arrowhead Lake, installing unobtrusive fencing along the length of the sea wall; posting interpretive signs around Sharp Park regarding the important habitat areas; removing invasive exotic plants and lawn and replanting the park and Sanchez Creek with appropriate native species. (Center for Biological Diversity)

- Select a full restoration alternative at Sharp Park. (Celeste Langille)
- We would like to see what we call a “maximum ecological restoration alternative” for the SNRAMP. (Nature in the City)
- The SFRPD must consider full restoration of Sharp Park through the CEQA process and cannot assume that the golf course will exist indefinitely. (Brent Plater)
- The EIR must address scaling back the Natural Areas Program to a few Natural Areas that can be well maintained. (San Francisco Dog Owners Group)
- The EIR should study a maximum restoration alternative for each Natural Area. (Sierra Club San Francisco Group)
- The lead criterion for Sharp Park alternatives should be protection of habitat for listed species. (Sierra Club San Francisco Group)
- The potential impacts of the proposed project are a great concern. The SFRPD should not approve this project. (Annemarie A. Donjacour)
- Additionally, the Natural Areas Program park proposal ignores the serious public safety issues that should be addressed, especially at Sharp Park. An EIR must cover the public safety issues for humans at every park in detail, as well as provide substantial, reliable, scientific evidence to justify the proposed ecosystem changes. (Suzanne Valente)
- The EIR should study the effects of unchecked growth of nonnative forests, as well as alternative management scenarios for these forests, including managing for biodiversity, thinning, and allowing the natural succession of native plant communities. (Sierra Club San Francisco Group)
- Preserve the Sutro Forest area. (Martha Hoffman).
- I think it is a great idea to look at how to divert some of that water coming off Sharp Park Road. It’s just a big spillway right now, and Highway 1 and all that—and I think that could be done without damaging the creek. (Dan Briesach)
- The Natural Areas Program has its place, and it needs to be kept in that place. It cannot be allowed to trump the clear preferences of the vast majority of park land users in San Francisco. I think that the Natural Areas Program proposal for Sharp Park, as well the other park locations, intends to make major changes in the ecosystems, sometimes with no apparent benefit to wildlife and perhaps detrimental to important wildlife. (Suzanne Valente)

- Closure of the park or the entire golf course to create a natural areas wetlands restoration to benefit the red-legged frog and San Francisco garter snake is the latest proposal under consideration by SFRPD. This is pointless. US Fish and Wildlife did not designate Sharp Park as a critical habitat for the red-legged frog or San Francisco garter snake. Therefore, by the US Fish and Wildlife's own definition, whatever happens to either species in this area will have no impact upon the ultimate survival or failure of the species. There is no legal imperative for expansion of the habitat to benefit these two species. Environmental attorneys explained that there is critical habitat and everything else. So Sharp Park has the same requirements as a habitat as your home's driveway does. The Natural Areas Program report acknowledges that the quality of the habitat at Laguna Salada, Horse Stable Pond, and the adjacent wetlands remains excellent. Make the minor alterations biologists recommend and leave the rest of Sharp Park alone. (Suzanne Valente)
- Support off-road cycling in the other areas of Sharp Park, particularly up to the archery range, also up there beyond the archery range where it connects up to—up beyond the ridge. (Mitch Monroe)
- The Mount Davidson park and monument are important historic entities and should be recorded and documented in preparation for listing on the California Register of Historical Resources. Any historical trails created and enhanced as Works Progress Administration projects should be maintained and remain open. (Miraloma Park Improvement Club)
- Consider closing surfeit trails. (California Native Plant Society, Yerba Buena Chapter)
- In the event that dog activities in places such as Oak Woodlands cause significant impacts, the Natural Areas Program will have the right to require limited dog use. (Robert Bakewell)
- The eastern canyon areas of Sharp Park should be off-limits to dogs. (Celeste Langille)
- Selected alternative should not include an increase in recreational activities in Sharp Park that would result in increased vehicle traffic. (Celeste Langille)
- Consider developing multi-use trails and bicycle skill parks as sustainable uses for the open spaces and parks. (Dayton Crites; Tom Borden; Dan Schneider)
- The proposed project severely limits access to public space to protect endangered species where those species either do not exist or coexist peacefully with other uses. (Lisa Vittori)
- Restriction or elimination of dog play areas has several issues. To name a few: This decision should not be within the Natural Areas Program's jurisdiction because there has been arrangements made over time through the Dog Advisory Committee and the Dog Policy to add more dog play areas; the Natural Areas Program had initially the intention to work with the dog community when a management would be prepared and to continue using the areas for dog walking; the management plan stipulation that environmental studies should be conducted when new dog play areas are planned suggests that the existing heavy use of an area would be ignored and the analysis would consider starting with a pristine area that would be impacted by a new use. Instead of integrating native species into public spaces, the proposed project introduces threatened species and restricts access. (Lisa Vittori)
- Evaluate the impact of trails. Currently, hundreds of miles of trails criss-cross the Natural Areas. Any decision for improving or closing existing trails should be based on a comprehensive approach to trail planning. New trails through natural areas are not necessary. (Nancy Rosenthal)

- I'd like to say I'm particularly interested in McLaren Park because it's the best off-road riding in the City, and I agree with the McLaren Trail Plan in terms of closures and whatnot, except for the fact that bicycles are excluded. And I'd like to especially take issue with this issue MP-7 in the McLaren Park plan that lumps off-road motorcycles and mountain bikes together. We want to work with Natural Areas, we appreciate Natural Areas, we don't think trails—especially narrow trails going through natural areas—are damaging. (Tom Borden)
- It does scare me to have a dog just come up and rush a kid in the face. So, a de facto off-leash policy in our Natural Areas really needs to be looked at carefully. (Marnie Dunsmore)
- In the Oak Woodlands, large canopy trees are very problematic and should be removed in some places. (Robert Bakewell)
- Communicate and coordinate with the San Francisco Animal Care and Control and San Francisco Society for the Prevention of Cruelty to Animals on all policies concerning animals in San Francisco. (Martha Hoffman)
- Educational materials must address respect for all animals and plants and include the input of the San Francisco Animal Care and Control and San Francisco Society for the Prevention of Cruelty to Animals, Department of Recreation and Parks Services, and local wildlife expert Ms. Jamie Ray. (Martha Hoffman; Evan Elias)
- The restoration of Sanchez Creek should be added as a goal. The conservation and restoration goals for Sharp Park should maintain all viable populations of special status species, improve habitat and natural connectivity, and prevent introduction as well as decrease the existing amount of nonnative invasive species. (Celeste Langille)
- Evaluate management alternatives for Sharp Park. The report should provide information for making a selection that maximizes ecological and endangered species management and promotes the recovery of the San Francisco garter snake and the red-legged frog. (Nancy Rosenthal)
- The tree removal is necessary. We only support it during the non-nesting season, and we believe trees such as those used by colonial birds like herons and cormorants should be preserved. So should trees used by hawks and owls for nesting. We urge that habitat that's necessary for birds, such as California quail, spotted towhee, wren-tit, and other species restricted to coastal scrub should be established and maintained with the specific goal of continuing those specific habitat systems. (Golden Gate Audubon Society)
- We support restoration and appropriate management practices at Sharp Park that will ensure it as a viable habitat for red-legged frogs and San Francisco garter snakes. (Golden Gate Audubon Society)
- In terms of Sharp Park, we need to select the restoration alternative that maximizes the probability of protecting the snakes, that they will recover, so that the protection by the Endangered Species Act won't be necessary. The red-legged frog used to be the Jumping Frog of Calaveras County. A lot of plants and animals are becoming endangered because their habitat is strange. (California Native Plant Society, Yerba Buena Chapter)
- With feral cats, how will you implement what's described in the Quail Plan? (L-Danyielle Yacobucci)

- Replacement of the plants on the steep sand-covered areas of the Rock Outcropping at 14th Avenue, Ortega, and Pacheco Streets should be conducted in phases to avoid impacts on sand retention. (Lydia Cassorla)
- An objective study should be prepared in the future to evaluate the positive and negative impacts of feral cats in the urban environment of San Francisco. (Society for the Prevention of Cruelty to Animals San Francisco)
- Urges extra penalties for camping in Natural Areas. (Robert Bakewell)
- The management plan for Sharp Park violates the following mission statement of the SFRPD: “The San Francisco Recreation and Park Department’s Mission is to provide enriching recreational activities, maintain beautiful parks and preserve the environment for the well-being of our diverse community.” (Suzanne Valente)
- The management plan for Sharp Park intentionally disregards the following performance standard established in the SFRPD’s Operational Plan: “The Department shall consider, among other matters, the following issues: Public safety, which shall include the reduction of environmental and other hazards, safe equipment operations, and safe pesticide use.” (Suzanne Valente)
- Include new bike trails and a bicycle-specific park in the Archery Range and Shooting Range area of Sharp Park. (Mitch Monroe)
- Address motorcycles separately from bicycles. (Mitch Monroe)
- Consider the Trail Master Plan of the San Francisco Riders when planning trail closures and constructing new trails. (Mitch Monroe)
- Although the plan for the Interior Greenbelt does not indicate trail closures in that Natural Area, the Natural Areas Program is apparently closing this Natural Area to the public. The EIR must acknowledge what has actually happened and presently exists in the Natural Areas. These are omissions in the Initial Study that must be corrected in the EIR. (Karin Hu, Mary McAllister, Nancy Wuerfel)
- Everson/Digby Lots was not subjected to a lengthy public process and therefore should not be included in this EIR. (Karin Hu, Mary McAllister, Nancy Wuerfel)
- San Francisco’s large mature trees are truly an endangered species and need to be preserved. (San Francisco Tree Council)
- The IS is mistaken that any commitment has been made to replace all removed trees with native trees. Nor would such a commitment be advisable, given that planting native trees in most of the natural areas would not be successful because they are adapted to sheltered areas that are not representative of the Natural Areas. If they were planted, they would be unlikely to survive. The EIR must evaluate the impact of proposed tree removal, based on the accurate premise that most of the trees will not be replaced. (Karin Hu, Mary McAllister, Nancy Wuerfel)
- There is no basis upon which the IS may assume that nonnative trees designated for removal are dead or dying trees, as stated in GR-15. Tree removal designated by the SNRAMP is within Management Areas-1 and -2 areas for which GR-15 does not apply. (Karin Hu, Mary McAllister, Nancy Wuerfel)

- Removing invasive species does not necessarily enable the survival of native plants if they are no longer adapted to the conditions that have been altered by man. (Karin Hu, Mary McAllister, Nancy Wuerfel)
- What are the details of the plan for dredging Laguna Salada and removing bulrushes, including the permitting requirements? (San Francisco Public Golf Alliance)
- What are the details of the planned creation of a buffer zone between Laguna Salada and the golf course, including the permitting requirements? (San Francisco Public Golf Alliance)

### **EIR Recommendations**

The EIR will address these comments by modifying the project description and including in the analysis a Maximum Restoration Alternative, Maximum Recreation Alternative, and a Maintenance Alternative.

## **2.3 GENERAL CEQA**

### **Comments**

- In accordance with Resolution Number 0710-011, the CEQA documents must analyze impacts at all 31 Natural Areas, including quantification of effects at each Natural Area and cumulative effects on each Natural Area. (Nancy Wuerfel)
- The Initial Study does not address in Sections C.1 and C.2 the requirements of Administrative Code Chapter 63, including reporting, planning, and approval from the San Francisco Public Utilities Commission. The Initial Study does not quantify the capacity of the existing irrigation system, the amount of water needed by the project, or the square footage of land to be irrigated. It also does not include installation of water meters and San Francisco Public Utilities Commission approval of those meters. (Nancy Wuerfel)
- The Initial Study does not acknowledge that the Natural Areas Management Plan has not been approved for implementation and may be subject to further amendments and mitigation measures before approval for implementation. (Nancy Wuerfel)
- The project as outlined in the public meeting seems to ignore many of the 18 items that should be analyzed in the EIR. (Morley Singer)
- A certified arborist should evaluate impacts on trees in Mount Sutro Forest. (Morley Singer)
- Address geology and soils in the EIR. (Nancy Stafford)
- There's so many totally cockamamie things, that to leave out wind effects in the environmental impact report is striking. (Morley Singer)
- As we have in all environmental impact reports, I would like to know what the environmental impacts of a no-management plan alternative. I mean, I think that's required in the plan. (Greg Gaar)
- Address prescribed burning dangers in the EIR. High winds can cause a fire to get out of control. (San Francisco Dog Owners Group)
- Address the impact of poor maintenance in the EIR. Most areas are poorly maintained and plants die. So, that may affect future plans, too. (San Francisco Dog Owners Group)

- This is an EIR on the SNRAMP, not the Natural Areas Program. (Nature in the City)
- If you come up with a good way here to do the things that you're doing, can one of those other proposals override what you're already going to come up with? (Dave Diller)
- The EIR must reanalyze any data provided by the Natural Areas Program regarding environmental impacts of dogs to avoid misrepresentation of data and conclusions. (San Francisco Dog Owners Group)
- The impact analysis should distinguish between the effects of "free-roaming" dogs, those without human oversight, and "off-leash" dogs, those with human oversight. (San Francisco Dog Owners Group)
- The EIR needs to look at the effects of the immediate closures of the off-leash areas that are called for in this management plan, plus the effects of future closures that might be affected by an expansion of the natural areas into the off-leash areas. (San Francisco Dog Owners Group)
- The EIR must address the adverse traffic, air pollution, and global warming impacts associated with the closure of off-leash dog areas and the resulting vehicle trips to the remaining off-leash areas. (San Francisco Dog Owners Group)
- The EIR must address the impacts of overuse of remaining off-leash areas if some of the current off-leash areas are closed. If the Golden Gate National Recreation Area restricts off-leash access to its lands, this also could increase overuse of the remaining off-leash areas. (San Francisco Dog Owners Group)
- The EIR should study the effects of unchecked growth of nonnative forests, as well as alternative management scenarios for these forests, including managing for biodiversity, thinning, and allowing the natural succession of native plant communities. (Sierra Club San Francisco Group)
- Evaluate the impact of leaving 95 percent of the invasive trees in the natural areas. On Mount Davidson, where ground space is open after last winter's storm knocked down some trees, several native plants once again sprouted. Removing more of these understory-killing trees can bring back native plants and reestablish a healthy and diverse ecosystem. (Nancy Rosenthal)
- What are the environmental impacts of leaving 95 percent of the invasive trees in our natural areas? If you go to areas where you have dense eucalyptus, dense cypress, and pine, you'll find there's no biological diversity in the understory because the shading, the fog drift, it destroys the native plants that have been there for hundreds of thousands of years. (Greg Gaar)
- Identify the environmental impacts of the no action alternative. (Greg Gaar)
- The decision to convert existing forest adjacent to neighboring homes to a sensitive plant museum has been made without proper scientific study or input from residents. Studies prepared by forest experts are needed to assess the impacts of forest conversion. (Denise Lapins)
- I just want our questions on the record. They have to do with the relationship between this EIR process and the process that the Board of Supervisors asked the SFRPD to look into, a possible change of use of the golf course when we have a serious environmental question relating to that, and she may have ran through that area, but if they do anything to the golf course, that in itself will be subject to a completely separate EIR than this. (San Francisco Public Golf Alliance)

- I do favor the idea of restoring Sharp Park and restoring the city water corridor as well, and how it connects with other green spaces in the area. I would like to ask that we consider the impact of leaving as many trees as you're suggesting leaving. In my view, 95 percent is an awful lot of trees. I would like to encourage consideration of the trails and the impact that the trails have on hiking, which is increasing in importance by many studies of recreational activities, whereas other activities have gone down on the list. Consider the impact of hiking and environmental education on students and other people regarding the bigger picture, to see where humans fit into the larger frame of things. (Ellen Edelson)
- Further evaluate the environmental impact of off-leash dog use. Natural areas cover only 27 percent of park lands. There should be room in the other 73 percent of some dog play areas. (Nancy Rosenthal)
- I'd like to say I'm particularly interested in McLaren Park because it's the best off-road riding in the city, and I agree with the McLaren Trail Plan in terms of closures and whatnot, except for the fact that bicycles are excluded. And I'd like to especially take issue with this issue MP-7 in the McLaren Park plan that lumps off-road motorcycles and mountain bikes together. We want to work with Natural Areas, we appreciate Natural Areas, we don't think trails—especially narrow trails going through natural areas—are damaging. (Tom Borden)
- As of May 2009, what aerial spraying is permitted by law for control of mosquito larvae and adults? What aerial spraying is conducted at Sharp Park for control of mosquito larvae and adults, including timing and seasonality? Describe any other mosquito control measures used at Sharp Park. What is the effect of mosquito control measures on the California red-legged frog population? What is the effect of mosquito control measures on residential neighbors of Sharp Park? (San Francisco Public Golf Alliance)
- Address environmental impacts of leaving 95 percent of invasive trees in the Natural Areas. (Greg Gaar)
- Identify the impacts of periodic tree removal on the forest in its entirety. (Denise Lapins)
- The Initial Study dismisses the environmental impacts and safety issues that have been experienced in the past. (San Francisco Tree Council; Karin Hu, Mary McAllister, Nancy Wuerfel)
- The Initial Study demonstrates that the author has not understood the SNRAMP, has not visited the natural areas, and ignored basic scientific principles such as carbon sequestration. (San Francisco Tree Council; Karin Hu, Mary McAllister, Nancy Wuerfel)
- A comprehensive EIR represents an opportunity to resolve some of the controversies that the program has generated in the last 10 years of its operation. The EIR should be expanded to include several environmental issues for which the Initial Study is inadequate, inaccurate, or is inconsistent with the reality of past actions of the Natural Areas Program. (Karin Hu, Mary McAllister, Nancy Wuerfel)
- The EIR must fully analyze the tree removal issues. (Karin Hu, Mary McAllister, Nancy Wuerfel)
- The IS assumes that native plants would survive in the long term. The study does not acknowledge that the ranges of native plant populations are changing in response to global warming. (Karin Hu, Mary McAllister, Nancy Wuerfel)

- Tree removal cannot be done piecemeal. Felling one tree will impact those in the close proximity. (Karin Hu, Mary McAllister, Nancy Wuerfel)
- At Lake Merced, over 100 trees would be removed from the eastern shore of the South Lake. This would expose an old population of huge cypress trees to wind blows at the Harding Park Golf Course. Massive tree failure could result. The EIR should indicate that the PGA Tour has been informed of the tree removal adjacent to the golf course and that the management actions in the SNRAMP will not violate the terms of the contract between the PGA Tour and the City. (Karin Hu, Mary McAllister, Nancy Wuerfel)
- The IS makes no mention of Pine Lake tree removals, nor the consequences of those removals. (Karin Hu, Mary McAllister, Nancy Wuerfel)
- The EIR must evaluate the potential for windthrow resulting from the removal of 18,500 trees. This evaluation must be done by a qualified consultant with expertise in forestry management. (Karin Hu, Mary McAllister, Nancy Wuerfel)

### **EIR Recommendations**

The EIR will address these comments by revisiting the environmental impact analysis included in the IS.

## **2.4 GENERAL ENVIRONMENTAL**

### **Comments**

- What's the definition of "substantial effect"? (L-Danyielle Yacobucci)
- It's important that the SFRPD and Planning Department keep in mind the mission of the Natural Areas Program, and that's another project program, which is to preserve, restore, and enhance the remnants of Natural Areas of the city. (Paul Koski)
- What's the definition of "environment"? Let's go back to the CEQA law and find out what it intends to protect. (Nancy Wuerfel)
- Why do we possibly acquire that many nonnative trees and put them in the middle of a Natural Areas Program if indeed natural areas were defined only as remnants? (Nancy Wuerfel)
- I just want to point out—first, I want to answer some questions about Laguna Salada, you know, and the flooding. You have two things that took place there. You had where the berm blew out, pushed tons and tons of sand that came in there, and there's like a two- to three-foot-wide area where the lake is extremely shallow where the sand came in. This took place back in 1983, I think. So that is a factor that has caused—contributes to the flooding. (Ron Maykel)
- And also the tules and the cattails, these are deciduous plants. You know, they die off and then all of the thatch from these plants creates—basically assists in the build-up, which creates—makes the lake become shallower and shallower over years and years. The debris just builds up. And that's a big part of the siltation there. And I think that's one of the bigger—bigger reasons why that's happening. (Ron Maykel)
- The Corps of Engineers built the wall. When they built the wall, they blocked a natural stream that was on the north end of the park. The Corps of Engineers then changed it so that the drainage went into the Laguna Salada. They then attached all the drainage to the freeway and

everything else to that drain. So the Corps of Engineers actually put all that silt in there. Now, it's full and backing up because San Francisco hasn't done anything about it. They haven't either replaced the stream or exited the north end or anything else, which means the City of Pacifica then has to spend money pumping out the water, which doesn't make any sense to me. I don't know why Pacifica doesn't just send San Francisco a bill. (David Marshall)

- The second thing is that there's another issue, which is the recycled water. San Francisco Public Utilities Commission is supposed to kick in some money for recycled water, which will help keep the pond in a more consistent level, but as part of this new study, it's my impression that they're trying to just renege on the whole deal. (David Marshall)
- We need to get together and work to solve our common problems, which I think is painfully evident now, Laguna Salada is dysfunctional. (Dan Briesach)
- There's an overflow pipe at Horse Stable Pond that used to function, and now it's silted in. (Dan Briesach)
- I love the golf course. I want to thank the people trying to preserve the frogs and the snakes. (Chuck Egiziano)
- Consider the berm, the conditions of the berm. (Mike Pacelli)
- The City and County of San Francisco must comply with the California Coastal Act. The City of Pacifica has a certified Local Coastal Program (LCP) and the portion of Sharp Park west of Highway One is within the LCP. Therefore, a Coastal Development Permit (CDP) should be obtained for project activities affecting west Sharp Park. (City of Pacifica)
- The proposed project is subject to Pacifica's Logging Operations Ordinances, Ordinance Numbers 636 C.S. and 673 C.S. Any tree removal, destruction, or harvesting of twenty or more trees within one year is prohibited unless considered in the CDP or unless the Pacifica Public Works Director makes specific findings regarding the tree removal operations. (City of Pacifica)
- Given that Sharp Park is not listed by the US Department of the Interior Fish and Wildlife Service as critical habitat for threatened or endangered species, what is San Francisco's liability concern with respect to compliance with the Endangered Species Act conservation requirements? (Juanita Mercado; Suzanne Valente)
- Removing the 15,000 trees in Sharp Park will jeopardize the habitat of 20 special status species. The citizens of Pacifica intend to demand their city officials hold the SFRPD to the terms of Pacifica's anti-logging ordinance. (Suzanne Valente)
- The EIR should address compliance with the Pacifica Logging Ordinance. (Karin Hu, Mary McAllister, Nancy Wuerfel)
- The EIR should address compliance with the San Francisco General Plan, specifically Policy 2.9 of the Recreation and Open Space Element. (Karin Hu, Mary McAllister, Nancy Wuerfel)

### **EIR Recommendations**

The EIR will address these comments by revisiting the environmental impact analysis included in the IS.

## 2.5 CUMULATIVE IMPACTS

### Comments

- The EIR should analyze the cumulative impacts on the Mount Sutro Forest and the neighboring properties and residents associated with the SNRAMP and the University of California/Federal Emergency Management Agency grant proposal. (Denise Lapins; Morley Singer; Evan Elias)

### EIR Recommendations

The EIR will address this comment by including this project in the cumulative impact analysis.

## 2.6 LAND USE AND LAND USE PLANNING

### Comments

- Request that the Environmental Impact Report include an analysis of the project's consistency with the Pacifica local coastal land rules and policies and any pertinent Pacifica land use regulations. We also believe that a local coastal development permit may be required and ask that the EIR include an analysis of that requirement. (City of Pacifica)
- Pacifica is in the process of updating its general plan and local coastal plan, which could alter or modify existing land use policies or result in new policies that could impact the areas covered in the proposed Natural Areas Management Plan. (City of Pacifica)
- Contrary to what is stated in the Initial Study, the SNRAMP changes land use by restricting access to the Natural Areas. The SNRAMP has the potential to eliminate all forms of recreation other than walking on a designated path as it implements its goals. The proposal to transfer or develop joint management of Sharp Park with the Golden Gate National Recreation Area indicates the potential for ownership of Natural Areas to change in the pursuit of restoration goals. These changes in land use must be acknowledged and evaluated in the EIR. Recreation access not identified by the IS must also be evaluated by the EIR. (Karin Hu, Mary McAllister, Nancy Wuerfel)

### EIR Recommendations

The EIR will address these comments by including analysis of the project's consistency with the Pacifica local coastal program and the Pacifica general plan and addressing indirect change in land use within the Natural Areas.

## 2.7 AESTHETICS

### Comments

- Address the effects of tree removal at Mount Davidson on the quality of the human experience and the hill's viewpoint, including increased noise, altered wind and fog patterns, growth of poison oak, and increased erosion. (Miraloma Park Improvement Club)
- Preserve the beautiful forest. (Morley Singer)
- Use a scientific evaluation process with respect to recreation and aesthetics. (Andrea O'Leary)

- How would views from the surrounding residences be impacted by the three scenarios, views into the park as well as our views to the beach and the ocean? (Rabine Runneals)
- The EIR must address the adverse aesthetic impacts from poor maintenance of the Natural Areas. (San Francisco Dog Owners Group)

### **EIR Recommendations**

The EIR will address how tree removal affects views at Mount Davidson and Sharp Park. The San Francisco Planning Department approves of the evaluation process used to analyze potential impacts. The EIR assumes proposed actions would be implemented correctly, but it cannot assume poor maintenance would occur.

## **2.8 POPULATION AND HOUSING**

No comments were received on this topic.

## **2.9 CULTURAL AND PALEONTOLOGICAL RESOURCES**

### **Comments**

- The Sharp Park Golf Course should be recognized as a significant historic architectural resource in the EIR. (San Francisco Public Golf Alliance)
- The Mount Davidson park and monument are important historic entities and should be recorded and documented in preparation for listing on the California Register of Historical Resources. Any historical trails created and enhanced as Works Progress Administration projects should be maintained and remain open. (Miraloma Park Improvement Club)
- One of the things about Sharp Park is that Alister MacKenzie designed the course. That has a lot of history involved with it. Goes back to a lot of the famous golf courses that are currently being used, and I think that should be taken into consideration. (Steve Rush)
- Looking at the historical and cultural part of the environment, it is a famous golf course. Also, the clubhouse was done by the Willis Polk firm. (Kathleen Manning)

### **EIR Recommendations**

To address these comments, a Historical Resource Evaluation Report will be prepared to evaluate the Sharp Park Golf Course and Mount Davidson. The results of that report will be incorporated into the EIR. The EIR will also address these comments by stating that redesign or elimination of the Sharp Park Golf Course is not part of the proposed project. Proposals for redesign/elimination of the golf course would be addressed in the cumulative setting.

## **2.10 TRANSPORTATION AND CIRCULATION**

### **Comments**

- If you close off-leash areas, people will have to drive to a park across town in order to get to a legal off-leash area. This will affect traffic, air pollution, and global-warming. (San Francisco Dog Owners Group)

**EIR Recommendations**

The EIR will address this comment by assessing the impacts of increased vehicle trips resulting from project implementation.

**2.11 NOISE****Comments**

- Address the effects of tree removal at Mount Davidson on the quality of the human experience and the hill's viewpoint, including increased noise, altered wind and fog patterns, growth of poison oak, and increased erosion. (Miraloma Park Improvement Club)

**EIR Recommendations**

The EIR will address noise impacts on sensitive receptors that would result from removing trees at Mount Davidson.

**2.12 AIR QUALITY****Comments**

- Suggesting that native plants would be more effective in the removal of carbon dioxide is absolute nonsense. (Morley Singer)
- Address global warming from tree removal. (Morley Singer)
- Closing off-leash areas will force people to drive to a park across town in order to get to a legal off-leash area. This will affect traffic, air pollution, and global warming. (San Francisco Dog Owners Group)
- Removing trees will necessarily have a negative impact on global warming. (Marnie Dunsmore)
- The author of the IS does not provide a full reference to the claim that young trees have long-term carbon sequestration, which results in a net greenhouse gas benefit. (Karin Hu, Mary McAllister, Nancy Wuerfel)
- The release of carbon stored in the 18,500 trees that would be removed would certainly swamp whatever benefit there may be in replacing some of the trees. (Karin Hu, Mary McAllister, Nancy Wuerfel)
- Because of the cumulative effect of all the sources of carbon release predicted by the SNRAMP, the effect of prescribed burns on carbon release and air pollution must be considered by the EIR. Consideration of prescribed burns by a separate and later environmental review is not acceptable. (Karin Hu; Mary McAllister; Nancy Wuerfel)
- Carbon sequestration by trees and plants is directly proportional to their size. Therefore, a small sapling is incapable of sequestering as much carbon as a large tree, whether it is healthy or not. The US Department of Agriculture reports that tree cover is less than 12 percent of San Francisco's area, yet trees remove about 19 percent more air pollution than shrubs in San Francisco. This finding refutes the claim that converting many acres of trees into grassland will benefit air quality in San Francisco. (Karin Hu, Mary McAllister, Nancy Wuerfel)

- The removal of seedlings and saplings is incremental to the designated removal of 18,500 trees. This would result in additional reduction in carbon sequestration that should be quantified. (Karin Hu, Mary McAllister, Nancy Wuerfel)
- The IS does not consider the potential for the death of many native trees if sudden oak death continues to spread. (Karin Hu, Mary McAllister, Nancy Wuerfel)
- The author of the IS does not provide a full citation of the claim that grassland above 50 degrees latitude reflects more sun than forest canopies. (Karin Hu, Mary McAllister, Nancy Wuerfel)
- The reflected light argument is based on the comparison between dark forests and the reflected light of snow in northern latitudes. It is clearly a stretch to apply this concept to the local climate where there is no snow. (Karin Hu, Mary McAllister, Nancy Wuerfel)
- Increased temperature on the forest does not reduce the carbon sequestering abilities of the forest that are a by-product of photosynthesis. (Karin Hu, Mary McAllister, Nancy Wuerfel)
- If nonnative plants and trees are removed from 25 percent of all park acreage in San Francisco and it proves impossible to successfully grow native plants in those locations, there will clearly be no carbon sequestration benefit from these efforts. (Karin Hu, Mary McAllister, Nancy Wuerfel)

### **EIR Recommendations**

The EIR will analyze the impacts on global warming and greenhouse gases that would result from removing trees, replacing mature trees with young native trees or with grassland, and the potential risk of native trees dying. Additional air pollutant emissions associated with increased vehicle trips also will be assessed, if necessary.

## **2.13 WIND AND SHADOW**

### **Comments**

- Address the effects of tree removal at Mount Davidson on the quality of the human experience and the hill's viewpoint, including increased noise, altered wind and fog patterns, growth of poison oak, and increased erosion. (Miraloma Park Improvement Club)
- The Sutro Forest is always damp. It sucks out water from the fog, and it's always wet in there. I sail on the bay, and maybe two days out of the year, the wind comes from the east; 363 days a year, it comes from the west. The forest is a windbreak for all of the structures east of the forest, from Parnassus Street all the way to up to the top of Twin Peaks, and if you take down the trees, then the westerly winds would just fan a fire that's coming from the forest area. (Morley Singer)
- Investigate wind patterns. (Nancy Stafford)
- When you get to the impact of removing trees, you have to look at wind, increased wind, and you have to look beyond the park itself. (San Francisco Dog Owners Group)
- The EIR must address the adverse wind impacts resulting from the removal of trees and nonnative plants. (San Francisco Dog Owners Group)
- Include in the EIR the virtues of eucalyptus trees. Those trees are unique in that they actually grow in the sandy soil and withstand the fierce winds blowing off the Pacific. Studies have

shown that eucalyptus trees slow the wind down at least 30 percent in the Presidio. (San Francisco Tree Council)

### **EIR Recommendations**

The EIR will analyze the wind effects of removing trees, including those effects on residential neighborhoods near the Natural Areas. The analysis will also assess the ability of the replacement native trees to act as wind barriers, compared to the eucalyptus trees.

## **2.14 RECREATION**

### **Comments**

- Address the effects of tree removal at Mount Davidson on the quality of the human experience and the hill's viewpoint, including increased noise, altered wind and fog patterns, growth of poison oak, and increased erosion. (Miraloma Park Improvement Club)
- The cost of tree removal at Mount Davidson would divert limited resources from the basic maintenance of the park, degrading the public experience. (Miraloma Park Improvement Club)
- Consider biking trails and their impacts within the archery range and other hilly areas. More public and legal bike trails are needed. (Adam LaBarge)
- This analysis should address the whole issue of designated off-leash areas within the Natural Areas. (California Native Plant Society, Yerba Buena Chapter)
- Address the impacts of restricting public access for the protection of sensitive habitat plantings within the interior greenbelt and at the Belgrave trailhead in particular. (Denise Lapins)
- You also have to look at the impact on recreation of the introduction of the especially threatened native species. What we see at Sharp Park is that if there's a threatened or endangered species, or even a sensitive species, suddenly the federal government just gets involved, and we lose all local control of those areas, and that's not something we necessarily want to do. We have to make sure that we retain local control of our local parks. (San Francisco Dog Owners Group)
- Use a scientific evaluation process with respect to recreation and aesthetics. (Andrea O'Leary)
- Glen Park has so much urine from dogs in it that it's hard to go there. (Marnie Dunsmore)
- Introducing endangered or threatened species into areas where there are none would threaten active recreational opportunities when open space is at a premium. (Nancy Stafford)
- Contrary to what is stated in the IS, the SNRAMP changes land use by restricting access to the Natural Areas. The SNRAMP has the potential to eliminate all forms of recreation other than walking on a designated path as it implements its goals. The proposal to transfer or develop joint management of Sharp Park with the Golden Gate National Recreation Area indicates the potential for ownership of Natural Areas to change in the pursuit of restoration goals. These changes in land use must be acknowledged and evaluated in the EIR. Recreation access not identified by the IS must also be evaluated by the EIR. (Karin Hu, Mary McAllister, Nancy Wuerfel)

**EIR Recommendations**

The EIR will address the effects that removing and replacing trees at Mount Davidson will have on the recreational experience. The EIR will discuss funding sources for the activities proposed under the SNRAMP and any potential issues with bike trails and other recreation within the Natural Areas, including the archery range. The EIR will discuss the impacts of dog play areas on recreation and measures to minimize those impacts. The EIR will address the policies of general public access and trail access in the Natural Areas and the protection of sensitive habitats within all of the Natural Areas, including the Interior Greenbelt. The EIR will address whether the proposed management actions would restrict or otherwise affect recreation opportunities within the Natural Areas. The EIR will address the adaptive management approach, which will equally evaluate the management of recreation and any potential impacts on aesthetics within the natural areas. The EIR will address the operation and maintenance of dog play areas and its impact on Natural Area visitors.

**2.15 UTILITIES AND SERVICE SYSTEMS****Comments**

- The Initial Study does not address in Sections C.1 and C.2 the requirements of Administrative Code Chapter 63, including reporting, planning, and approval from the San Francisco Public Utilities Commission. The Initial Study does not quantify the capacity of the existing irrigation system, the amount of water needed by the project, or the square footage of land to be irrigated. It also does not include installation of water meters and San Francisco Public Utilities Commission approval of those meters. (Nancy Wuerfel)
- The EIR must include the analysis of additional water use. Any irrigation in Natural Areas is new and incremental. (Karin Hu, Mary McAllister, Nancy Wuerfel)

**EIR Recommendations**

The EIR will address these comments by including information on the capacity of the existing irrigation water system, the increase in water demand from the project, and the projected increase in the size of the areas to be irrigated. Also included will be a discussion of Administrative Code Chapter 63 and additional San Francisco Public Utilities Commission requirements.

**2.16 PUBLIC SERVICES**

No comments were received on this topic.

**2.17 BIOLOGICAL RESOURCES****Comments**

- Regarding A4.4, Best Management Practices, Erosion Control, use of wood chips for erosion control should be evaluated for impacts on wildlife, including bees and birds, some of which use dirt areas for dust baths. (Golden Gate Audubon Society)
- Regarding A5.15, India Basin Shoreline supports a large and multispecies collection of waterfowl from fall through spring. (Golden Gate Audubon Society)
- Regarding A5.18, Great Blue Herons should also be mentioned in this section. (Golden Gate Audubon Society)

- Regarding LM-6c, access to the East Lake shoreline between September 1 and March 31 would affect several nesting species, including the “San Francisco” common yellowthroat. (Golden Gate Audubon Society)
- Table 2 should not be limited to breeding birds, but include species dependant on Natural Areas during some part of the year: tri-colored blackbirds in Lake Merced during the fall and winter and brown pelicans and peregrine falcons occasionally present at Lake Merced and India Basin. (Golden Gate Audubon Society)
- The EIR should include an updated, comprehensive biological inventory of all species of concern in San Francisco, their distributions, and their population conditions. If not for the entire city, then at least for the Natural Areas. (Golden Gate Audubon Society)
- How is the habitat for the California red-legged frog affected by the continued existence of the seawall? (San Francisco Public Golf Alliance)
- As of May 2009, what aerial spraying is permitted by law for control of mosquito larvae and adults? What aerial spraying is conducted at Sharp Park for control of mosquito larvae and adults, including timing and seasonality? Describe any other mosquito control measures used at Sharp Park. What is the effect of mosquito control measures on the California red-legged frog population? What is the effect of mosquito control measures on residential neighbors of Sharp Park? (San Francisco Public Golf Alliance)
- The proposed level of tree removal at Mount Davidson would significantly impair the habitat for birds and animals. (Miraloma Park Improvement Club)
- The importance of Sharp Park for the long-term survival and recovery of the San Francisco garter snake cannot be overstated. It is the northernmost population within the species, and as climate change shifts species habitats northward, this population is the most likely to successfully adapt to changing conditions. Because it is the most genetically intact of any population, it would best serve as a source for reintroduction of the species into historic habitats. (Brent Plater)
- The EIR should include an assessment of dog impacts on plants and wildlife based on scientific studies done for urban parks, not for wilderness areas (San Francisco Dog Owners Group)
- Extensive clearing of underbrush and blackberry removal must be studied in terms of potential impacts on wildlife, such as raccoons, skunks, possums, etc. In this regard, Jamie Ray, Director of the San Francisco Wildlife Rehabilitation Program, must be consulted. (Martha Hoffman)
- A listing of all the animals present within the Natural Areas must be added to the environmental document. (Martha Hoffman)
- There are many predators other than feral cats in the Natural Areas of San Francisco, such as the western scrub-jay, common raven, American crow, Cooper’s, sharp-shinned, and red-tailed hawk, owl, gray fox, striped skunk, northern raccoon, domestic cat, California ground squirrel, red fox, coyotes, feral pigs, frogs, snakes, cormorants, herons, turtles, badger, mice, rats, bobcats, and humans. (L-Danyielle Yacobucci)
- Cats in the Natural Areas of San Francisco are sterilized, fed, and monitored. (L-Danyielle Yacobucci; Susan Wheeler)
- Replacing eucalyptus trees with native plants might not be successful in a modern urban setting. (Morley Singer)

- The nonnative blackberry bushes are great habitat for many animals. Carefully consider any changes that could impact the animals living in the City parks. (Annemarie A. Donjacour)
- The IS is inaccurate with the statement that “. . . no important bird habitat has been designated in the Interior Greenbelt.” The following birds were observed: yellow warblers, Steller’s jays, bush-tits, song sparrows, owls, and red-tailed hawks. There are potentially more sensitive bird species living in or utilizing the Interior Greenbelt that would be negatively impacted with the removal of the eucalyptus trees and brush. (Evan Elias)
- The IS identified “no site specific wildlife related areas” within the Interior Greenbelt. This area is home to skunks, raccoons, opossums, and feral cats. The Himalayan blackberry provides nesting area and protection for these local mammals. (Evan Elias)
- The feral cats within the Interior Greenbelt behave as part of the ecosystem, not as a top predator. They are cautious and on guard in this environment, and their territory is small. The birds and mammals do not fear them, and the cats do not exhibit hunting behavior. (Evan Elias)
- What are the environmental impacts of leaving 95 percent of the invasive trees in our natural areas? If you go to areas where you have dense eucalyptus, dense cypress, and pine, you’ll find there’s no biological diversity in the understory because the shading, the fog drift; it destroys the native plants that have been there for hundreds of thousands of years. (Greg Gaar)
- What are the environmental impacts of cutting new trails through sensitive natural areas/wildflower fields? (Greg Gaar)
- The issue of trees, you mentioned 64,000 trees in the Natural Areas. Adolph Sutro did not plant that many trees. They have been increasing by reseeding reproduction for many decades now, and so much so that they’re imperiling their own health. They’re way too crowded; for their own benefit, they need thinning. And I think that the EIR ought to consider the impact both on the trees themselves, but more particularly on the biodiversity. Every year that passes, there are fewer and fewer native plants and more and more weeds. And trees can be weeds, too. (California Native Plant Society, Yerba Buena Chapter)
- What would be the impact of no nonnative animals—raccoons, possums, cats. If you remove them all, what will be that impact? How will the rodent population be affected? (L-Danyielle Yacobucci)
- What’s the definition of a “native animal plant,” “weed,” “predator”? (L-Danyielle Yacobucci)
- What’s the effect of keeping the natives—nonnatives, what will the effect be of removing all those eucalyptus trees? (L-Danyielle Yacobucci)
- Protect the animals. (Martha Hoffman)
- Look at the endangered species that use Sharp Park and how they also use those contiguous lands. (Mary Keitelman)
- Address the beach areas being used for the western snowy plover threatened under the Endangered Species Act, black oyster catcher, which I think is just not even of concern. It’s on the edge, maybe being threatened. And other birds that use that beach for roosting, as well as breeding. (Mary Keitelman)

- On East Sharp Park, there's a large population of newts in the pond that drains under the freeway, and it's of concern to me and to a lot of other people that those newts are free of chloramine and able to survive and thrive. (Mary Keitelman)
- Do some kind of study on populations of San Francisco garter snake, red-legged frog. (Steve Sinai)
- The Natural Areas Program proposal would result in major changes to the ecosystem without apparent benefit to wildlife or even detriment to important wildlife. The EIR should provide scientific evidence of the benefits of the proposed ecosystem changes. (Suzanne Valente)
- Address the effects of tree removal at Mount Davidson on the quality of the human experience and the hill's viewpoint, including increased noise, altered wind and fog patterns, growth of poison oak, and increased erosion. (Miraloma Park Improvement Club)
- Address environmental impacts of off-leash dog areas and new trails within sensitive natural areas. (Greg Gaar)
- Address the impacts of herbicide application on people, animals, and insects. (Denise Lapins)
- Address chloramine in the water affecting amphibians. (Mary Keitelman)
- Removing the 15,000 trees in Sharp Park will jeopardize the habitat of 20 species of special status species. The citizens of Pacifica intend to demand their city officials hold the SFRPD to the terms of Pacifica's antilogging ordinance. (Suzanne Valente)
- Leaving tree stumps on the ground would create an ideal breeding medium for treehole mosquitoes as well as other types of mosquitoes. The western treehole mosquito is the primary vector of dog and cat heartworm in California. (Suzanne Valente)
- The EIR should analyze the impacts of herbicide use on wildlife in the Natural Areas. (Karin Hu, Mary McAllister, Nancy Wuerfel)

### **EIR Recommendations**

The EIR will address these comments by including additional information and analysis of the suggested sensitive, invasive, and pest species, where appropriate and feasible. Further, the EIR will carefully consider the effects on biological resources caused by trail creation, herbicide application, and dog use areas.

## **2.18 GEOLOGY AND SOILS**

### **Comments**

- Regarding E.13, Geology and Soils, impacts once the projects are in place should be addressed in the EIR. At Pine Lake, off-leash dogs cause erosion that destroys restoration sites. Dog and feral cat waste causes soil and water contamination. These impacts also likely occur at Buena Vista Park, Lake Merced, and McLaren Park. (Golden Gate Audubon Society)
- Regarding E.13, Geology and Soils, Lake Merced, impacts of leaving cypress and pine trees along steep banks that can't support them and resulting soil removal and erosion caused by them falling should be evaluated. (Golden Gate Audubon Society)

- Address the effects of tree removal at Mount Davidson on the quality of the human experience and the hill's viewpoint, including increased noise, altered wind and fog patterns, growth of poison oak, and increased erosion. (Miraloma Park Improvement Club)
- Assess the erosion impacts on neighboring homes that would result from tree removal. (Denise Lapins)
- Address erosion impacts of the removal of 54,000 trees in Sharp Park. (City of Pacifica)
- Address landslides and earth movement that would result from tree removal at Mount Sutro Forest. (Morley Singer)
- Erosion is a significant problem in Golden Gate Heights area, the natural areas, and Grandview, and sand is a significant problem when ice plant's been removed and it goes into the neighbors' yards. (San Francisco Dog Owners Group)
- A forester should evaluate the erosion impacts from cutting trees down. (Nancy Wuerfel)
- The EIR must address the adverse erosion impacts resulting from the removal of trees and nonnative plants. (San Francisco Dog Owners Group)
- Include in the EIR the virtues of eucalyptus trees. Those trees are unique in that they actually grow in the sandy soil and withstand the fierce winds blowing off the Pacific. Studies have shown that eucalyptus trees slow the wind down at least 30 percent in the Presidio. (San Francisco Tree Council)
- Erosion in Sharp Park is a very serious issue and should be addressed immediately, especially with the plan to remove 15,000 trees. (Suzanne Valente)
- The removal of nonnative trees and vegetation prescribed by the SNRAMP is likely to exacerbate the erosion situation. The analysis should evaluate the impacts on the surrounding neighborhoods that would result from tree removal from and destabilization of sand hills. (Karin Hu, Mary McAllister, Nancy Wuerfel)
- The EIR must study past erosion sites in the Natural Areas and evaluate the SNRAMP for its potential to cause further erosion in the future. (Karin Hu, Mary McAllister, Nancy Wuerfel)

### **EIR Recommendations**

The EIR will address these comments by including information on the measures outlined in the SNRAMP that are intended to minimize erosion during tree and vegetation removal activities, such as the Best Management Practices that are proposed in the SNRAMP. Additionally, we will incorporate our assessment of erosion effects that was presented in the Initial Study.

## **2.19 HYDROLOGY AND WATER QUALITY**

### **Comments**

- Regarding E.13, Geology and Soils, impacts once the projects are in place should be addressed in the EIR. At Pine Lake, off-leash dogs cause erosion that destroys restoration sites. Dog and feral cat waste causes soil and water contamination. These impacts also likely occur at Buena Vista Park, Lake Merced, and McLaren Park. (Golden Gate Audubon Society)

- To what extent are Laguna Salada, Horse Stable Pond, and their associated wetlands created, recharged, or enhanced by irrigation at Sharp Park Golf Course? (San Francisco Public Golf Alliance)
- How would complete cessation of irrigation at Sharp Park Golf Course affect the salinity of Laguna Salada, Horse Stable Pond, and their associated wetlands? (San Francisco Public Golf Alliance)
- How would reduced irrigation at Sharp Park Golf Course affect salinity of Laguna Salada, Horse Stable Pond, and their associated wetlands? What are the effects in low-rainfall months vs. high-rainfall months? (San Francisco Public Golf Alliance)
- What effect does groundwater generated by Sharp Park Golf Course irrigation have on the hydrostatic pressure affecting the seawall? How would complete cessation of irrigation at Sharp Park Golf Course affect the strength and/or integrity of the seawall? How would reduced irrigation at Sharp Park Golf Course affect the strength and/or integrity of the seawall? What are the effects in low-rainfall months vs. high-rainfall months? (San Francisco Public Golf Alliance)
- Address the proposed project impacts on drainage patterns and flood hazards within the Sharp Park area. Analyze the risk of flood hazard on Sharp Park and adjacent residential areas. (City of Pacifica)
- Address the impacts of sea-level rise on the western portion of Sharp Park. (Celeste Langille)
- Address runoff impacts that would result from tree removal at Mount Sutro Forest. (Morley Singer)
- Consider flooding in the EIR—flooding impact, including out into the neighborhood and proposed methods to prevent flooding in all three of the scenarios. (Rabine Runneals)
- Consider the impacts of the storm drainage system off Sharp Park Road, you know, the golf course area. (Mike Pacelli)
- Address the impacts of herbicides on groundwater. (Morley Singer)
- Address the increase in water consumption that would be required for the native plantings. (Morley Singer)
- The removal of 18,500 nonnative trees has the potential to significantly change drainage patterns in many Natural Areas because many are steep hills and canyons. The EIR must evaluate the impact of tree removal on existing drainage patterns in all Natural Areas. (Karin Hu, Mary McAllister, Nancy Wuerfel)
- Provide details on the drainage from Horse Stable Pond to the beach, including water level of the outflow pipe, pump capacity, pump condition, water level and capacity of the gravity outflow line, and the operational status of the gravity outflow line. (San Francisco Public Golf Alliance)

### **EIR Recommendations**

The EIR will address these comments by including information from the Laguna Salada hydrology study in the EIR and including information on expected sea level rise related to global climate change. Additionally, available information on the amount and type of herbicides used in the Natural Areas will be used to evaluate potential groundwater impacts from herbicides.

## 2.20 HAZARDS AND HAZARDOUS MATERIALS

### Comments

- As of May 2009, what aerial spraying is permitted by law for control of mosquito larvae and adults? What aerial spraying is conducted at Sharp Park for control of mosquito larvae and adults, including timing and seasonality? Describe any other mosquito control measures used at Sharp Park. What is the effect of mosquito control measures on the California red-legged frog population? What is the effect of mosquito control measures on residential neighbors of Sharp Park? (San Francisco Public Golf Alliance)
- Address the impacts of herbicide application on people, animals, and insects. (Denise Lapins)
- The EIR must address the adverse impacts of herbicide application needed to control the spread of nonnative plants that results from poor maintenance of the Natural Areas. (San Francisco Dog Owners Group)
- Address the use of hazardous materials for controlling mosquitoes and what you use to keep the mosquitoes down when you increase the number and size of ponds and things like that. (San Francisco Dog Owners Group)
- The proposed activities at Laguna Salada, such as changes to the depth, shape, and vegetation, would result in the development of mosquitoes, which would necessitate the application of pesticides. The staff of the San Mateo Mosquito and Vector Control District would like to work with the Planning Department during the design phase to ensure that changes at the Laguna Salada minimize the potential for mosquito development. (San Mateo Mosquito and Vector Control District)
- The EIR must address the adverse impacts of creating habitat that encourages mosquito breeding, increasing the public health risk from West Nile Virus. (San Francisco Dog Owners Group)
- How will mosquitoes be controlled? (Rabine Runneals)
- Address the impact of increasing mosquito breeding in EIR. That's a real problem at Sharp Park. (San Francisco Dog Owners Group)
- Expanding the wetland will enhance mosquito breeding and will create an uncontrollable situation, knowing that a recent court ruling bans the San Mateo County Mosquito and Vector Abatement District from spraying pesticides to kill adult mosquitoes. (Suzanne Valente)
- Leaving tree stumps on the ground would create an ideal breeding medium for treehole mosquitoes, as well as other types of mosquitoes. The western treehole mosquito is the primary vector of dog and cat heartworm in California. (Suzanne Valente)
- Address the impacts of prohibiting pesticides use on mosquito populations, especially the mosquito carrying the West Nile Virus. The EIR should analyze the impacts of herbicide use on wildlife in the Natural Areas. (Karin Hu, Mary McAllister, Nancy Wuerfel)
- There is no evidence of significant advantage of native trees to resist fire. The Mount Sutro Forest captures moisture from the fog, and tree removal has the potential to dry out this area and alter the wind patterns. Tree removal has the potential to increase fire hazard on the homes near the Mount Sutro Forest. (Morley Singer)

- The restored landscape of native grassland and dune scrub is not less flammable than the nonnative that would be removed. (Karin Hu, Mary McAllister, Nancy Wuerfel)
- The EIR must address the adverse impacts on adjacent homes should prescribed burning escape control. (San Francisco Dog Owners Group)
- The track record for the use of prescribed burns to support restoration efforts indicates that they can burn out of control. The EIR should analyze fire hazards and the use of prescribed burns. (Suzanne Valente)
- The Natural Areas Program should address public safety issues in detail at every park, especially at Sharp Park. (Suzanne Valente)
- Additionally, the Natural Areas Program park proposal ignores the serious public safety issues that should be addressed, especially at Sharp Park. An EIR must cover the public safety issues for humans at every park in detail, as well as provide substantial, reliable, scientific evidence to justify the proposed ecosystem changes. (Suzanne Valente)
- Consider hazardous waste in the EIR. Hazardous waste and materials should be considered because the Natural Areas Program has used pesticides to control invasive species. (Nancy Stafford)
- Toxic lead in the soil east of Highway One is a concern and should be addressed. The possibility of the lead leaching into the groundwater, the stream in the canyon, and flowing to Laguna Salada wetlands would result in the contamination of the sites that the Management Plan intends to restore. (Suzanne Valente)
- Removal of nonnative plants and trees would enhance habitat for small mammals that carry ticks and cause the spread of Lyme disease in the residential neighborhood. (Suzanne Valente)

### **EIR Recommendations**

The EIR will address the potential increase in mosquitoes as a result of the proposed project. Further, the analysis will include the recommendations of the staff of the San Mateo Mosquito and Vector Control District, following consultation on the best measures to limit potential growth of the mosquito population in Laguna Salada. Impacts of using herbicides on the local population, on wildlife, and on groundwater will also be analyzed. The EIR will also address the potential fire hazards that would result from removing trees. Public safety within the Natural Areas will also be addressed. The level of toxic lead in the soil east of Highway One and the potential of lead flowing to Laguna Salada will be analyzed in the EIR. The EIR will also assess the potential spread of lime disease from enhancing the habitat for small mammals that carry ticks.

#### **2.21 MINERAL AND ENERGY RESOURCES**

No comments were received on this topic.

#### **2.22 AGRICULTURAL RESOURCES**

No comments were received on this topic.

**Appendix A**  
**Scoping Notices**



# SAN FRANCISCO PLANNING DEPARTMENT

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## Notice of Preparation of an Environmental Impact Report

*Date:* April 22, 2009  
*Case No.:* 2005.1912E  
*Project Title:* Natural Areas Management Plan  
*Project Size:* 1,105 acres  
*Project Sponsor:* Daniel LaForte, San Francisco Recreation and Park Department  
(415) 831-2742  
*Lead Agency:* San Francisco Planning Department  
*Staff Contact:* Jessica Range – (415) 575-9018  
[jessica.range@sfgov.org](mailto:jessica.range@sfgov.org)

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Suite 400  
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Planning  
Information:  
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### PROJECT DESCRIPTION

Fragments of unique plant and animal habitats within San Francisco and Pacifica, known as Significant Natural Resource Areas (Natural Areas), have been preserved within parks that are managed by the San Francisco Recreation and Park Department (SFRPD). In the late 1990s, the SFRPD developed a Natural Areas Program to protect and manage these Natural Areas for the natural and human values they provide. The Natural Areas Program mission is to preserve, restore, and enhance the remnant Natural Areas and to promote environmental stewardship of these areas. On January 19, 1995, the San Francisco Recreation and Park Commission approved the first Significant Natural Resource Areas Management Plan (SNRAMP).

Over the course of several years, the SFRPD developed a new SNRAMP, with the final draft plan published in February 2006 and based on the 1995 plan. This SNRAMP contains detailed information on the biology, geology, and trails within 31 Natural Areas, 30 of which are in San Francisco and one (Sharp Park) is in Pacifica. The SNRAMP is intended to guide natural resource protection, habitat restoration, trail and access improvements, other capital projects, and maintenance activities over the next 20 years.

A detailed project description can be found in the Initial Study attached to this Notice of Preparation.

### FINDING

**This project may have a significant effect on the environment and an Environmental Impact Report is required.** This determination is based upon the criteria of the State CEQA Guidelines, Sections 15063 (Initial Study), 15064 (Determining Significant Effect), and 15065 (Mandatory Findings of Significance), and for the reasons documented in the Environmental Evaluation (Initial Study) for the project, which is attached.

### PUBLIC SCOPING PROCESS

Pursuant to the State of California Public Resources Code Section 21083.9 and California Environmental Quality Act Guidelines Section 15206, two public scoping meeting will be held to receive oral comments concerning the scope of the EIR. These meetings will be held on **Tuesday, May 12, from 6:30 pm to 9:30 pm** at **County Fair Building Auditorium in Golden Gate Park (9th Avenue and Lincoln Way)** and

Thursday, May 14, from 6:30 pm to 9:30 pm at Pedro Point Firehouse in Pacifica (1227 Danmann Avenue). Written comments will also be accepted at this meeting and until the close of business on May 26, 2009. Written comments should be sent to Bill Wycko, San Francisco Planning Department, Natural Areas Management Plan, 1650 Mission Street, Suite 400, San Francisco, CA 94103.

If you work for a responsible State agency, we need to know the views of your agency regarding the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR when considering a permit or other approval for this project. Please include the name of a contact person in your agency.

April 20, 2009  
Date

  
Bill Wycko  
Environmental Review Officer

**PLANNING DEPARTMENT  
ENVIRONMENTAL REVIEW NOTICE**

Notice is hereby given to the general public of the following actions under the Environmental Review Process. Review of the documents concerning these projects can be arranged by calling (415) 558-6378 and asking for the staff person indicated.

**NOTICE OF PREPARATION OF EIR**

The initial evaluation conducted by the Planning Department determined that the following project(s) may have significant effects on the environment and that an Environmental Impact Report (EIR) must be prepared.

**Case No. 2005.1912E: Significant Natural Resources Areas Management Plan**

In February 2006, the San Francisco Recreation and Parks Department developed the Significant Natural Resource Areas Management Plan (SNRAMP), addressing 31 Natural Areas in San Francisco and Pacifica. The SNRAMP guides natural resource protection, habitat restoration, trail and access improvements, other capital projects, and maintenance over the next 20 years.

The SNRAMP delineates Natural Areas into management area categories and proscribes both general management activities for all Natural Areas and activities for each Natural Area [RANGE].

Notice is hereby given to the general public as follows:

- 1) A Notice of Preparation of an EIR was published on April 22, 2009 by the Planning Department in connection with this project.
- 2) An Initial Study in connection with this project has now been prepared by the Planning Department. A copy of the report can be obtained for public review and comment at the Planning Department offices at 1660 Mission Street, 1<sup>st</sup> Floor Planning Information Center. The report can also be viewed on-line starting April 22, 2009 at [www.sfgov.org/planning](http://www.sfgov.org/planning). Referenced materials are available for review by appointment at the Planning Department's office at 1650 Mission Street, 4<sup>th</sup> Floor. (Call 575-9018 to schedule an appointment.)
- 3) Public scoping meetings will be held to receive oral comments concerning the scope of the EIR on **Tuesday, May 12, from 6:30 pm to 9:30 pm at County Fair Building Auditorium in Golden Gate Park (9th Avenue and Lincoln Way) and Thursday, May 14, from 6:30 pm to 9:30 pm at Pedro Point Firehouse in Pacifica (1227 Danmann Avenue).**
- 4) Public comments concerning the scope of the EIR will be accepted from April 22, 2009 to 5:00 p.m. on May 26, 2009. Mail written comments to the San Francisco Planning Department, Attn. Bill Wycko, Environmental Review Officer, Significant Natural Areas Management Plan NOP/IS, 1650 Mission Street, Suite 400, San Francisco, CA 94103.

**SAN FRANCISCO EXAMINER**

This space for filing stamp only

450 MISSION ST 5TH FL, SAN FRANCISCO, CA 94105  
Telephone (415) 359-2723 / Fax (415) 359-2659

VIRNA BYRD  
S.F. PLANNING DEPT  
1650 MISSION ST #400  
SAN FRANCISCO, CA - 94103

**PROOF OF PUBLICATION**

(2015.5 C.C.P.)

State of California )  
County of SAN FRANCISCO ) ss

Notice Type: GPN - GOVT PUBLIC NOTICE

Ad Description: ENVIRONMENTAL REVIEW NOTICE - PRELIMINARY  
MITIGATED NEGATIVE DECLARATION

I am a citizen of the United States and a resident of the State of California; I am over the age of eighteen years, and not a party to or interested in the above entitled matter. I am the principal clerk of the printer and publisher of the SAN FRANCISCO EXAMINER, a newspaper published in the English language in the city of SAN FRANCISCO, county of SAN FRANCISCO, and adjudged a newspaper of general circulation as defined by the laws of the State of California by the Superior Court of the County of SAN FRANCISCO, State of California, under date 10/18/1951, Case No. 410667. That the notice, of which the annexed is a printed copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to-wit:

04/22/2009

Executed on: 04/22/2009  
At Los Angeles, California

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Signature

EXM#: 1574645

**PLANNING DEPARTMENT  
ENVIRONMENTAL  
REVIEW NOTICE**

Notice is hereby given to the general public of the following actions under the Environmental Review Process. Review of the documents concerning these projects can be arranged by calling (415) 575-9025.

**PRELIMINARY MITIGATED  
NEGATIVE DECLARATION**

The initial evaluation conducted by the Planning Department determined that the following projects could not have a significant effect on the environment, and that no environmental impact report is required. Accordingly, a Preliminary Mitigated Negative Declaration has been prepared.

Public recommendations for amendment of the text of the finding, or any appeal of this determination to the Planning Commission (with \$500 filing fee) must be filed with the Department within 20 days following the date of this notice. In the absence of an appeal, the Negative Declaration shall be made final, subject to any necessary modifications, 20 days from the date of this notice.

**2007.1464E : 1036 - 1040 Mission Street** - The 15,192 square foot (sf) project site at 1036 - 1040 Mission Street (Assessor's Block 3703, Lots 79 and 80) in the South of Market neighborhood is zoned C-3-G (Downtown Commercial District) and is within a 120-F height and bulk district. The proposed project includes demolition of an existing surface parking lot, and construction of a thirteen-story, 120-foot-tall building with up to 132 affordable housing units (130,000 gross square feet (gsf)), ground-floor retail/non-profit space (up to 1,300 gsf), and about 7,450 square feet of open space in a ground-floor podium-level courtyard and roof deck. No off-street parking is proposed. (CONTRERAS)

**NOTICE OF  
PREPARATION OF EIR**

The initial evaluation conducted by the Planning Department determined that the following project(s) may have significant effects on the environment and that an

Environmental Impact Report (EIR) must be prepared.

**2005.1912E : Significant Natural Resources Areas Management Plan** In February 2006, the San Francisco Recreation and Parks Department developed the Significant Natural Resource Areas Management Plan (SNRAMP), addressing 31 Natural Areas in San Francisco and Pacifica. The SNRAMP guides natural resource protection, habitat restoration, trail and access improvements, other capital projects, and maintenance over the next 20 years.

The SNRAMP delineates Natural Areas into management area categories and proscribes both general management activities for all Natural Areas and activities for each Natural Area [RANGE].

Notice is hereby given to the general public as follows:

- 1) A Notice of Preparation of an EIR was published on April 22, 2009 by the Planning Department in connection with this project.
- 2) An Initial Study in connection with this project has now been prepared by the Planning Department. A copy of the report can be obtained for public review and comment at the Planning Department offices at 1660 Mission Street, 1<sup>st</sup> Floor Planning Information Center. The report can also be viewed on-line starting April 22, 2009 at [www.sfgov.org/planning](http://www.sfgov.org/planning). Referenced materials are available for review by appointment at the Planning Department's office at 1650 Mission Street, 4<sup>th</sup> Floor. (Call 575-9018 to schedule an appointment.)
- 3) Two public scoping meetings will be held to receive oral comments concerning the scope of the EIR on **Tuesday, May 12 at 6:30 p.m. at the County Fair Building Auditorium in Golden Gate Park (9<sup>th</sup> Ave and Lincoln Way) and on Thursday, May 14 at 6:30 p.m. at Pedro Point Firehouse in Pacifica (1227 Danmann Ave.).**
- 4) Public comments concerning the scope of the EIR will be accepted from April 22, 2009 to 5:00 p.m. on May 26, 2009. Mail



\* A 0 0 0 0 0 1 1 1 4 1 6 1 \*

written comments to the San  
Francisco Planning Depart-  
ment. Attn: Bill Wycko.  
Environmental Review  
Officer. Significant Natural  
Areas Management Plan  
NOP/IS. 1650 Mission  
Street, Suite 400. San  
Francisco, CA 94103.

**AFFIDAVIT OF PUBLICATION  
OF LEGAL NOTICE**

in the



**STATE OF CALIFORNIA** }  
**County of San Mateo** } **SS.**

**PUBLIC NOTICE**

**SAN FRANCISCO  
PLANNING  
DEPARTMENT  
ENVIRONMENTAL REVIEW  
NOTICE**

Notice is hereby given to the general public of the following actions under the Environmental Review Process. Review of the documents concerning these projects can be arranged by calling (415) 558-6378 and asking for the staff person indicated.

**NOTICE OF PREPARATION OF EIR**

The initial evaluation conducted by the Planning Department determined that the following project(s) may have significant effects on the environment and that an Environmental Impact Report (EIR) must be prepared.

**Case No. 2005.1912E: Significant Natural Resources Areas Management Plan**

In February 2006, the San Francisco Recreation and Parks Department developed the Significant Natural Resource Areas Management Plan (SNRAMP), addressing 31 Natural Areas in San Francisco and Pacifica. The SNRAMP guides natural resource protection, habitat restoration, trail and access improvements, other capital projects, and maintenance over the next 20 years.

The SNRAMP delineates Natural Areas into management area categories and prescribes both general management activities for all Natural Areas and activities for each Natural Area [RANGE].

Notice is hereby given to the general public as follows:  
1) A Notice of Preparation of an EIR was published on April 22, 2009 by the Planning De-

**ELAINE LARSEN declares under penalty of perjury:**

That she is and at all times hereinafter mentioned was a citizen of the United States, over the age of eighteen years and a resident of Pacifica, California, and was at and during all said times the printer, Editor and Publisher of PACIFICA TRIBUNE, a newspaper published weekly in the City of Pacifica, County of San Mateo, State of California; that said newspaper is and was at all times herein mentioned, a newspaper of general circulation as that term is defined by Section 6000, 6001, and 6008 of the Government Code of the State of California, and that a judicial decree establishing the newspaper as one of general circulation has been obtained, as provided in Title 1, Division 7, Chapter 1, of said Government Code, and as provided by said sections is and was at all times herein mentioned in compliance with the requirements of Title 1, Division 7, Chapter 1, of said Government Code; that at all said times said newspaper has been established and published in said City of Pacifica, County of San Mateo, State of California, at regular intervals for more than one year preceding the first publication of the Legal Notice herein mentioned; that said Notice was set in type not smaller than nonpareil and was preceded with words printed in black face type not smaller than nonpareil describing and expressing in general terms and purport and character of the Notice intended to be given; that the Legal Notice in the above entitled matter, of which the annexed is a true printed copy, was published in said newspaper on the following dates, to wit:

\_\_\_\_\_  
April 22, 2009  
\_\_\_\_\_

**that the date of the first publication of said Notice in said newspaper is**

\_\_\_\_\_  
April 22, 2009  
\_\_\_\_\_

Executed on April 22, \_\_\_\_\_ 20 09 at Pacifica, California

\_\_\_\_\_  
Elaine Larsen



# SAN FRANCISCO PLANNING DEPARTMENT

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## PUBLIC NOTICE

### Availability of a Notice of Preparation of an Environmental Impact Report for Natural Areas Management Plan Planning Department Case No. 2005.1912E

1650 Mission St.  
Suite 400  
San Francisco,  
CA 94103-2479

Reception:  
**415.558.6378**

Fax:  
**415.558.6409**

Planning  
Information:  
**415.558.6377**

A Notice of Preparation (NOP) has been issued by the San Francisco Planning Department in connection with this project. A copy of the NOP is available for public review at the Planning Department offices at 1660 Mission Street, 1<sup>st</sup> Floor Planning Information Counter. The NOP is also available at the Planning Department web site: <http://www.sfgov.org/planning/mea>.

#### **Project Description:**

Fragments of unique plant and animal habitats within San Francisco and Pacifica, known as Significant Natural Resource Areas (Natural Areas), have been preserved within the parks that are managed by the San Francisco Recreation and Park Department (SFRPD). In the late 1990s, the SFRPD developed a Natural Areas Program to protect and manage these Natural Areas for the natural and human values they provide. The Natural Areas Program mission is to preserve, restore, and enhance the remnant Natural Areas and to promote environmental stewardship of these areas. On January 19, 1995, the San Francisco Recreation and Park Commission approved the first Significant Natural Resource Areas Management Plan (SNRAMP).

Over the course of several years, the SFRPD developed a new SNRAMP, with the final draft plan published in February 2006 and based on the 1995 plan. This SNRAMP contains detailed information on the biology, geology, and trails within 31 Natural Areas, 30 of which are in San Francisco and one (Sharp Park) is in Pacifica. The SNRAMP is intended to guide natural resource protection, habitat restoration, trail and access improvements, other capital projects, and maintenance activities over the next 20 years.

The SNRAMP delineates the acreage within each Natural Area into management area categories based on the management priority—MA-1, MA-2, and MA-3. The management area categories represent differing levels of sensitivity, species presence, and habitat complexity. The SNRAMP proscribes both general management activities that apply to all Natural Areas and management activities specific to each Natural Area.

A detailed project description can be found in the Initial Study that is attached to the NOP.

#### **Public Scoping Process:**

Pursuant to the State of California Public Resources Code Section 21083.9 and California Environmental Quality Act Guidelines Section 15206, two public scoping meetings will be held to receive oral comments concerning the scope of the EIR. These meetings will be held on **Tuesday, May 12, from 6:30 pm to 9:30 pm** at **County Fair Building Auditorium in Golden Gate Park (9th Avenue and Lincoln Way)** and **Thursday, May 14, from 6:30 pm to 9:30 pm** at **Pedro Point Firehouse in Pacifica (1227 Danmann Avenue)**. Written comments will also be accepted at this meeting and until the close of business on **May 26, 2009**. Written comments should be sent to Bill Wycko, San Francisco

Planning Department, Natural Areas Management Plan, 1650 Mission Street, Suite 400, San Francisco, CA 94103.

If you work for a responsible State agency, we need to know the views of your agency regarding the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR when considering a permit or other approval for this project. Please include the name of a contact person in your agency.

If you have any questions about the **environmental review** of the proposed project, please call Jessica Range at 415-575-9018.

## **Appendix B**

### **Scoping Meeting Materials**

## **May 12 Scoping Meeting**



# SAN FRANCISCO PLANNING DEPARTMENT

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## Agenda Natural Areas Management Plan Environmental Impact Report Public Scoping Meeting

**County Fair Building Auditorium, Golden Gate Park  
Tuesday, May 12, 6:30 PM**

### **I. Introduction**

- Meeting logistics
- Introductions to EIR Preparers and Project Sponsor
  - Jessica Range – SF Planning Department (EIR Coordinator)
  - Sarah Jones- SF Planning Department (EIR Supervisor)
  - Daniel LaForte – San Francisco Recreation and Park Department (Project Sponsor)
  - John Bock – Tetra Tech (EIR Consultant)
- Purpose of meeting
- Meeting format

### **II. Brief Overview of Proposed Project**

- Questions on the proposed project

### **III. Summary of California Environmental Quality Act (CEQA) Process**

- Notice of Preparation/IS (30-day public review period)
- Scoping Meeting
- Draft EIR (45-day public review period, Planning Commission hearing)
- Comments and Responses Document (approx. 14-day review)
- Final EIR Certification (Planning Commission hearing)
- Questions on the CEQA Process

### **IV. Public Comment**

- Comments on environmental review issues from speakers who fill out a speaker card
- Time limit for each speaker

### **V. Final Reminders**

- Submit written comments to **Environmental Review Officer, San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA 94103**, by close of business, **May 26, 2009**.
- If you have questions or comments regarding the proposed project and the environmental process, please contact **Jessica Range** at **(415) 575-9018**.

**San Francisco Planning Department  
EIR Public Scoping Meeting Written Comment Form  
Natural Areas Management Plan  
Case # 2005.1912E**

If you wish to submit written comments on the above project, you may do so on this sheet (although use of this form is not required). Please submit written comments at today's public scoping meeting, or by mail to Bill Wycko, San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA 94103. **All comments must be submitted no later than 5 P.M., May 26, 2009.**

*Write your comments regarding the environmental review for the project here. Use the back of the sheet or additional pages if necessary.*

Name: \_\_\_\_\_

Organization (if any): \_\_\_\_\_

Address: \_\_\_\_\_

E-mail Address: \_\_\_\_\_

## San Francisco Planning Department Speaker Card

To aid in the preparation of minutes or a transcript, you are requested, but not required, to provide this information:

Please **PRINT** then give to meeting moderator

Please provide a phonetic pronunciation guide to your name if necessary

Name: \_\_\_\_\_

Organization (if any): \_\_\_\_\_

Address: \_\_\_\_\_

E-mail Address: \_\_\_\_\_

## San Francisco Planning Department Speaker Card

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Please provide a phonetic pronunciation guide to your name if necessary

Name: \_\_\_\_\_

Organization (if any): \_\_\_\_\_

Address: \_\_\_\_\_

E-mail Address: \_\_\_\_\_



**SAN FRANCISCO  
PLANNING DEPARTMENT**

**EIR Public Scoping Meeting  
Natural Areas Management Plan  
May 12, 2009**

1650 Mission St.  
Suite 400  
San Francisco,  
CA 94103-2479

Reception:  
415.558.6378

Fax:  
415.558.6409

Planning  
Information:  
415.558.6377

PRINT NAME	ORGANIZATION	ADDRESS	E-MAIL ADDRESS	FUTURE NOTIFICATION METHOD
✓ PATRICK SKAIN	PINELAKE PARK NEIGHBORHOOD ASSOC.	300 CRESTLAKE DR SF CA 94132	patskain@aatt.net	<input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> E-mail
✓ SALLY STEPHENS	SFDGG, GOLDEN GATE HEIGHTS NEIGHBORHOOD ASSOC.	127 QUINTARA ST SF CA 94116	STEPHENSFW@MINDSPRING.COM	<input type="checkbox"/> Regular Mail <input checked="" type="checkbox"/> E-mail
MARY ALLEN	Forest Knolls neighborhood	377 Oak Park Dr	cyder@mac.com	<input type="checkbox"/> Regular Mail <input checked="" type="checkbox"/> E-mail
BARRY Lee	self-city Resident	677-12th Ave SF CA 94118	blcsfo@gmail.com	<input type="checkbox"/> Regular Mail <input checked="" type="checkbox"/> E-mail
✓ MORLEY SINGER	CITY RESIDENT.	177 BELGRAVE AVE, SF.	mzinger1@comcast.net	<input checked="" type="checkbox"/> Regular Mail <input checked="" type="checkbox"/> E-mail
David Rea	City Resident	6647 - CALIFORNIA ST SF CA 94121	drea@gmwest.com	<input type="checkbox"/> Regular Mail <input checked="" type="checkbox"/> E-mail
✓ Craig Dawson	Mt. Diablo Stewards	1128 Irving St. SE 94122		<input type="checkbox"/> Regular Mail <input type="checkbox"/> E-mail
✓ Karin Hu			branz_ca@yahoo.com	<input type="checkbox"/> Regular Mail <input checked="" type="checkbox"/> E-mail
Judith Waide	NPE	451 Hayes St 94102	jwaide@sfnpe.org	<input type="checkbox"/> Regular Mail <input checked="" type="checkbox"/> E-mail
Paul Koski	SF. Resident, OMS member	20 Shields St 94132	pkoski7@netscape.net	<input type="checkbox"/> Regular Mail <input checked="" type="checkbox"/> E-mail
PAM HEMPHILL	DOLORES HEIGHTS IMPROVEMENT CLUB, ANIMAL COMMISSION	423 Hill St SF 94114	PAM.HEMPHILL@GMAIL.COM	<input type="checkbox"/> Regular Mail <input type="checkbox"/> E-mail
Andrea O'Leary	E-QUP.	DOB 31304 94131	EQUP@aol.com	<input type="checkbox"/> Regular Mail <input checked="" type="checkbox"/> E-mail
✓ NANCY ROSENTHAL				<input type="checkbox"/> Regular Mail <input type="checkbox"/> E-mail
✓ Susan Wheeler	volunteer SF BECA Feral Cat Team	230 Moncada Way SF. Ca 94127	wappwheeler@aol.com	<input type="checkbox"/> Regular Mail <input type="checkbox"/> E-mail
✓ Dan Murphy	Golden Gate Audubon	2945 Ulbra St SF. CA 94116	murphst@yahoo.com	<input type="checkbox"/> Regular Mail <input checked="" type="checkbox"/> E-mail



**SAN FRANCISCO  
PLANNING DEPARTMENT**

**EIR Public Scoping Meeting  
Natural Areas Management Plan  
May 12, 2009**

1650 Mission St.  
Suite 400  
San Francisco,  
CA 94103-2479

Reception:  
415.558.6378

Fax:  
415.558.6409

Planning  
Information:  
415.558.6377

PRINT NAME	ORGANIZATION	ADDRESS	E-MAIL ADDRESS	FUTURE NOTIFICATION METHOD
Marnie Dunsmore	California Native Plant Society	118 College Ave, SF 94112	marniedunsmore@earthlink.net	<input checked="" type="checkbox"/> Regular Mail <input checked="" type="checkbox"/> E-mail
Jake Sigg	" "	338 Ortega St SF 94122	jakesigg@earthlink.net	<input type="checkbox"/> Regular Mail <input checked="" type="checkbox"/> E-mail
L. Yacobucci	SFSPCA	PO Box 2067 Daly City	harris.rose@att.net	<input type="checkbox"/> Regular Mail <input checked="" type="checkbox"/> E-mail
A. Belway	—	631-35th Ave SF 94121	apbelway@pacbell.net	<input checked="" type="checkbox"/> Regular Mail <input checked="" type="checkbox"/> E-mail
E. Elias	SFSPCA - NATURE IN THE CITY	575 Belvedere St SF 94117	eeliasmail@yahoo.com	<input checked="" type="checkbox"/> Regular Mail <input checked="" type="checkbox"/> E-mail
Greg Gaar	NATURE IN THE CITY	440 Hazelwood SF 94127	dunetansy@yahoo.com	<input type="checkbox"/> Regular Mail <input checked="" type="checkbox"/> E-mail
Linda Pomerantz			lindapomerantz@gmail.com	<input type="checkbox"/> Regular Mail <input checked="" type="checkbox"/> E-mail
JOHN R. RAUCH	SAN FRANCISCO ARCHERS	1156 VALENCIA WAY PACIFICA CA.	JNCR2@AOL.COM	<input checked="" type="checkbox"/> Regular Mail <input checked="" type="checkbox"/> E-mail
Nancy Wuerfel	SF SPCA	2516 23rd Ave, SF. 94116	Nance number 1@aol.com	<input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> E-mail
Martha Hoffman	SF SPCA	1750 Waller SF 94117	—	<input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> E-mail
Richard Harris	SF PUBLIC GOLF ASSOCIATION	220 WASHINGTON ST # 303 SF CA 94102	richard@erstkiinstalley.com	<input type="checkbox"/> Regular Mail <input checked="" type="checkbox"/> E-mail
Charon Vilnai	—	260 Cresta Vista Drive SF, CA 94127	charon.vilnai@yahoo.com	<input type="checkbox"/> Regular Mail <input checked="" type="checkbox"/> E-mail
ROBERT BLASDELL	—	260 Cresta Vista DR SF, CA 94127	rcblasdell@yahoo.com	<input type="checkbox"/> Regular Mail <input checked="" type="checkbox"/> E-mail
Jan Longwell	self	1584 Shrader St. SF 94117	jan@janlongwell.ca	<input type="checkbox"/> Regular Mail <input checked="" type="checkbox"/> E-mail
Peter Bastow	Nature in the City	PO BOX 170088 94117	petere@natureinthecity.org	<input type="checkbox"/> Regular Mail <input type="checkbox"/> E-mail





## **May 14 Scoping Meeting**



# SAN FRANCISCO PLANNING DEPARTMENT

---

## Agenda Natural Areas Management Plan Environmental Impact Report Public Scoping Meeting

**Pedro Point Firehouse, Pacifica  
Thursday, May 14, 6:30 PM**

### **I. Introduction**

- Meeting logistics
- Introductions to EIR Preparers and Project Sponsor
  - Jessica Range – SF Planning Department (EIR Coordinator)
  - Sarah Jones- SF Planning Department (EIR Supervisor)
  - Daniel LaForte – San Francisco Recreation and Park Department (Project Sponsor)
  - John Bock – Tetra Tech (EIR Consultant)
- Purpose of meeting
- Meeting format

### **II. Brief Overview of Proposed Project**

- Questions on the proposed project

### **III. Summary of California Environmental Quality Act (CEQA) Process**

- Notice of Preparation/IS (30-day public review period)
- Scoping Meeting
- Draft EIR (45-day public review period, Planning Commission hearing)
- Comments and Responses Document (approx. 14-day review)
- Final EIR Certification (Planning Commission hearing)
- Questions on the CEQA Process

### **IV. Public Comment**

- Comments on environmental review issues from speakers who fill out a speaker card
- Time limit for each speaker

### **V. Final Reminders**

- Submit written comments to **Environmental Review Officer, San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA 94103**, by close of business, **May 26, 2009**.
- If you have questions or comments regarding the proposed project and the environmental process, please contact **Jessica Range** at **(415) 575-9018**.

**San Francisco Planning Department  
EIR Public Scoping Meeting Written Comment Form  
Natural Areas Management Plan  
Case # 2005.1912E**

If you wish to submit written comments on the above project, you may do so on this sheet (although use of this form is not required). Please submit written comments at today's public scoping meeting, or by mail to Bill Wycko, San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA 94103. **All comments must be submitted no later than 5 P.M., May 26, 2009.**

*Write your comments regarding the environmental review for the project here. Use the back of the sheet or additional pages if necessary.*

Name: \_\_\_\_\_

Organization (if any): \_\_\_\_\_

Address: \_\_\_\_\_

E-mail Address: \_\_\_\_\_

## San Francisco Planning Department Speaker Card

To aid in the preparation of minutes or a transcript, you are requested, but not required, to provide this information:

Please **PRINT** then give to meeting moderator

Please provide a phonetic pronunciation guide to your name if necessary

Name: \_\_\_\_\_

Organization (if any): \_\_\_\_\_

Address: \_\_\_\_\_

E-mail Address: \_\_\_\_\_

## San Francisco Planning Department Speaker Card

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Please provide a phonetic pronunciation guide to your name if necessary

Name: \_\_\_\_\_

Organization (if any): \_\_\_\_\_

Address: \_\_\_\_\_

E-mail Address: \_\_\_\_\_



**SAN FRANCISCO  
PLANNING DEPARTMENT**

**EIR Public Scoping Meeting  
Natural Areas Management Plan  
May 14, 2009**

1650 Mission St.  
Suite 400  
San Francisco,  
CA 94103-2479

Reception:  
415.558.6378

Fax:  
415.558.6409

Planning  
Information:  
415.558.6377

PRINT NAME	ORGANIZATION	ADDRESS	E-MAIL ADDRESS	FUTURE NOTIFICATION METHOD
Kathleen Manning	PACIFICA HISTORICAL Soc		MANNINGSBK@aol.com	<input type="checkbox"/> Regular Mail <input checked="" type="checkbox"/> E-mail
JERRY BRIESACH	SHARP PARK GOLF		JTBREEZE@GMAIL	<input type="checkbox"/> Regular Mail <input checked="" type="checkbox"/> E-mail
JACKIE FOSBERG	S.P. WOMENS GOLF CLUB	120 LOMITAS AV. SO.S.F.		<input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> E-mail
Tom Clifford		1122 Sheila Lane	TKCLIFFORD@COMCAST.NET	<input type="checkbox"/> Regular Mail <input type="checkbox"/> E-mail
Laurie Frater	Father of avid golfer		laurie.frater@sbcglobal.net	<input type="checkbox"/> Regular Mail <input checked="" type="checkbox"/> E-mail
Anden Frater	avid golfer	251 Berendos Avenue		<input type="checkbox"/> Regular Mail <input type="checkbox"/> E-mail
Steve Sinai	Pacific resident	450 San Pablo Terrace Pacifica	SSinai@yahoo.com	<input type="checkbox"/> Regular Mail <input checked="" type="checkbox"/> E-mail
Merrill Bobele	Loma Prieta Chapter Sierra Club	P.O. Box 2486 El Granada 94018		<input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> E-mail
JACK RAUCH	SAN FRANCISCO ARCHERS	1156 VALENCIA WAY PACIFICA CA 94044	JNCR2@AOL.COM	<input checked="" type="checkbox"/> Regular Mail <input checked="" type="checkbox"/> E-mail
Glen E. Sievert	Sharp Park Golf Club	233 Charing Cross Wy, Pacifica, Ca.	glsievert@yahoo.com	<input type="checkbox"/> Regular Mail <input checked="" type="checkbox"/> E-mail
NORM REGNART	sharp Park Golf Club		nregnart@nccwd.com	<input type="checkbox"/> Regular Mail <input type="checkbox"/> E-mail
ALLAN EISENBERG	SHARP PARK G.C.	2519 44th AVE 3F 94116	ALAN EISENBERG@MSN.COM	<input type="checkbox"/> Regular Mail <input type="checkbox"/> E-mail
STEVE PUGH	Sharp Park GC	461 ALTA Vista Dr Ssf	av-site@pacbell.net	<input type="checkbox"/> Regular Mail <input checked="" type="checkbox"/> E-mail
Ron Francis	Sharp Park Golf		pacfam5@pacbell.net	<input type="checkbox"/> Regular Mail <input checked="" type="checkbox"/> E-mail
Robert Petty	SPGC	20 Cranham Ct Pac		<input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> E-mail



**SAN FRANCISCO  
PLANNING DEPARTMENT**

**EIR Public Scoping Meeting  
Natural Areas Management Plan  
May 14, 2009**

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415.558.6377

PRINT NAME	ORGANIZATION	ADDRESS	E-MAIL ADDRESS	FUTURE NOTIFICATION METHOD
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**SAN FRANCISCO  
PLANNING DEPARTMENT**

**EIR Public Scoping Meeting  
Natural Areas Management Plan**

May 12, 2009

14

1650 Mission St.  
Suite 400  
San Francisco,  
CA 94103-2479

Reception:  
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**SAN FRANCISCO  
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Natural Areas Management Plan  
May 14, 2009**

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## **Appendix C**

### **Scoping Meeting Transcripts**

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SAN FRANCISCO PLANNING DEPARTMENT

TRANSCRIPT OF  
NATURAL AREAS MANAGEMENT PLAN  
ENVIRONMENTAL IMPACT REPORT  
PUBLIC SCOPING MEETING

COUNTY FAIR BUILDING AUDITORIUM, GOLDEN GATE PARK  
TUESDAY, MAY 12, 2009, 6:30 P.M.

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FOR THE PLANNING DEPARTMENT:

JESSICA RANGE, EIR COORDINATOR

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FOR THE RECREATION AND PARK DEPARTMENT:

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DAWN KAMALANATHAN, PLANNING DIRECTOR

LISA WAYNE

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JOHN BOCK, EIR CONSULTANT

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FOR 3D VISIONS:

KATE GILLESPIE

NICOLE WEST

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TUESDAY, MAY 12, 2009, 6:30 P.M.

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MS. RANGE: All right. Good evening, ladies and gentlemen. Welcome to the Significant Natural Areas Management Plan Environmental Impact Report Scoping Meeting.

Tonight, let me just start with the logistics. We have restrooms located right there to your left, and then we also have a drinking fountain. We also have beverages in the back. And there's four exits, and that's in case we need to leave quickly.

So, tonight I hope when you came in you signed in and got a copy of -- we have an agenda. We also have the Notice of Preparation, the one-page notice that we sent out. We also have a CEQA Process Flow Chart; that will help you when we give our presentation on CEQA. We also have a comment form so that you can make written comments to us tonight. We are accepting comments until May 26th at 5:00 p.m., close of business.

We also have a speaker card. So, if you have not done so, and you would like to speak tonight, please get a speaker card from our ladies over there, and fill it out and give it back to them, and we'll be calling people by the speaker card.

All right. I'm going to introduce myself. I'm

1 Jessica Range. I'm the EIR Coordinator with the  
2 San Francisco Planning Department.

3 This is Sarah Jones. She's the EIR Supervisor.  
4 She's also with the Planning Department.

5 Then we have Dawn Kamalanathan. She's with Rec &  
6 Park. We also have Daniel LaForte with Rec & Park, and  
7 we have Lisa Wayne with Rec & Park. And we have Kate  
8 Gillespie helping us with the scoping meeting this  
9 evening.

10 The purpose of this meeting is to take public  
11 comment on the scope of the environmental review for the  
12 Natural Areas Management Plan, and we'll get a little  
13 bit more into what "environmental review" means. We'll  
14 talk to you about the CEQA process.

15 Tonight, we're going to present a brief overview  
16 of the proposed project, the Natural Areas Plan, and  
17 we'll take comments at that time on -- or not comments,  
18 questions. If you have some questions on what the  
19 project is, we'll take questions then. We will then  
20 give you an overview of the CEQA process, explain where  
21 we are, and we'll take questions on CEQA at that time.  
22 Then, we will open it up to public comment.

23 And we do have a court reporter here to take  
24 public -- to help record the comments, so if you can  
25 please state your name when you speak, that would really

1 be helpful for us.

2           And then just a reminder: We'll be taking public  
3 comments until May 26th, close of business, and if you  
4 have any questions, you can contact myself, Jessica  
5 Range. We will have my contact information up there, or  
6 I also have business cards.

7           So, with that, I'm going to turn it over to Lisa  
8 Wayne, who will be giving you the overview of the  
9 project.

10           MS. WAYNE: Can everybody hear me okay? Great.

11           Thanks, everyone, for coming out.

12           Again, My name is Lisa Wayne, from the Recreation  
13 and Park Department Natural Areas Program.

14           Here we are again, and it's kind of unusual to not  
15 have an overflow room when Natural Areas is on the  
16 agenda, but we're glad you're all here today.

17           So, I'm tasked with basically talking about the  
18 management plan: a little bit of the history and a  
19 little bit of the conclusions. For those of you who  
20 haven't been involved in this process for a while, it  
21 will give you some background information.

22           Do I have some kind of clicker or --

23           Okay. So, natural areas -- natural areas are  
24 remnants of San Francisco's heritage -- natural  
25 heritage, and they contain wetlands, and creeks, and

1 sand dunes and oak woodlands, as well as urban forests,  
2 and scrub environments, and grasslands. They contain  
3 rare, and endangered, and unique species. They also  
4 have a habit for wildlife: a number of common wildlife  
5 species -- birds, butterflies, lizards, snakes, and  
6 things like that; and they also offer recreational  
7 amenities, so benches, viewing, a respite from the city,  
8 nature trails, and opportunities for environmental  
9 stewardship.

10           There are 32 natural areas in -- that are going to  
11 be covered by the EIR. The management plan covers 31,  
12 but since the time of the publication of the Management  
13 Plan in February 2006, we discovered another very small  
14 natural area, known as the Everson/Digby Lots, kind of  
15 near -- in the central part of the city near Billy Goat  
16 Hill and Fairmount Park. And these places range from  
17 under an acre to a few hundred acres, and as you can see  
18 all of the green spots around the map there, they're  
19 spread throughout the city, as well as in Sharp Park in  
20 the city of Pacifica in San Mateo County.

21           Natural areas acreage, there's some 1,105 acres  
22 covered under the Natural Areas Management Plan. About  
23 237 of those are in Pacifica, the remainder of those are  
24 in San Francisco. And you can see the breakdowns of  
25 land versus water mass, and then the proportions of

1 Recreation and Park Department land that is made up of  
2 these natural areas.

3         The Natural Areas Program began in 1997 when a  
4 number of civic, and environmental, and community  
5 organizations lobbied the Recreation and Park  
6 Department, and then General Manager Joel Robinson, to  
7 initiate a community-based restoration program. And  
8 essentially, since that time, the staff has grown from  
9 one to nine at this point in time with a mission to  
10 preserve, and restore, and enhance remnant natural areas  
11 through community-based stewardship.

12         So, part of the initial selling the program to our  
13 department was to say: You can get lots and lots of  
14 volunteers and community members involved in this work.  
15 And, on average, we work with about 13,000 volunteer  
16 hours per year doing habitat restoration, erosion  
17 control, trail maintenance, and everything else you can  
18 imagine in natural areas.

19         The background now on the plan itself, you could  
20 almost see it back to 1991 with the adoption of the open  
21 space element of the General Plan, which is Policy 2.13,  
22 which is now being actually revised to some extent, and  
23 that plan identifies some basic policy decisions around  
24 natural areas: that they should be preserved, that they  
25 should be managed, that they should be -- you know,

1 recreational opportunities should be allowed as long as  
2 they're in keeping with the natural environment.

3         In 1995, our commission adopted the Significant  
4 Natural Resource Areas Management Plan, and the  
5 development of the plan that we're discussing today as  
6 the project for the environmental review really began in  
7 1998, and it was a -- it's a refinement of that 1995  
8 plan. So, as you can see, we've been working on this  
9 for a good long decade now as a department.

10         There's a number of other relevant plans that are  
11 also considered, and you can read more about them in the  
12 plan itself.

13         So, the -- did he get the keys -- no, I'm sorry.  
14 Before. One more. Okay, yeah.

15         So, actually, when this slide was done, it was  
16 eight years to develop. Now, I guess, we can say 10  
17 years to develop.

18         There's been a number of drafts. In 2002, the  
19 citizen task force draft was released, and there are a  
20 number of advisory committees that evaluated it.

21         In June 2005, the public draft -- hit it again, if  
22 you would, John -- the public draft was released in  
23 2005, and there was a six-week comment period, three  
24 major workshops that took place around this plan, and  
25 2,700 comments were received on that plan. And from

1 those comments then, the final draft was prepared in  
2 February 2006, and it was approved by our commission as  
3 the project to receive environmental review. So, now,  
4 that's essentially where we are today.

5         The "Management Plan Goals" -- there's a number of  
6 goals that are outlined in there. There are kind of the  
7 general categories: conservation and restoration,  
8 education, research, stewardship, on down the line. And  
9 essentially, there are then different objectives within  
10 those categories. So, for example, it identifies in the  
11 "Restoration and Conservation" category to prioritize  
12 restoration work, to identify important wildlife areas,  
13 and protect and improve them, for example, working with  
14 local universities and schools to foster environmental  
15 education, and research, and so on.

16         So, more specifically, some of the Management Plan  
17 objectives -- I won't read through all these here,  
18 because I think I only have 10 minutes -- but  
19 essentially, develop an inventory, which we've done.  
20 It's all in a geographic information system -- looks at  
21 the plants that are found in that area, the wildlife,  
22 the soils, the trails; develop recommendations for  
23 improving wildlife habitat and sensitive species,  
24 prioritize restoration activities, develop guidelines  
25 for recreational uses, et cetera.

1           The organization of the plan, it's -- I forgot to  
2 bring a copy -- it's about that big (indicating), and  
3 it's organized by these chapters and numbers, and the  
4 parenthesis give the chapter numbers. So, the  
5 introductory chapters really deal with: What's the  
6 setting right now? What's it look like on the ground in  
7 these various places?

8           And then general recommendations that apply to  
9 many different natural areas, so having to do with, say,  
10 for example, preserving breeding-bird habitat by  
11 avoiding particular times of year for vegetation  
12 removal.

13           And then what may be of most interest to everyone  
14 is in Section 6, is every single natural area broken  
15 down with recommendations. And again, it has to do with  
16 plants, and animals, and trails, and other related  
17 features.

18           And as a way to prioritize the work for the  
19 natural areas, we broke down each natural area into  
20 management areas -- Management Areas 1, 2 and 3. And  
21 the Management Area 1 are the most sensitive, so they  
22 would contain your rare, and endangered, and unique  
23 species; Management Area 3 would be your least  
24 sensitive. So, this is a way to prioritize, again, nine  
25 staff, 1100 acres, 13,000 volunteer hours. You can kind

1 of do the math. It's really important to have a  
2 prioritization, so that's built into the plan.

3         And so, if you look in the naturalist plan at the  
4 end of each chapter, you'll find what's known as the  
5 "Management Area and Trail Plan Map." And so -- it's a  
6 little bit hard to see in this, but you can see this is  
7 Mount Davidson. The whole land mass is broken down into  
8 those red, gold and green colors that correspond to  
9 those MA1's, MA2's, and MA3's.

10         And each of the charts themselves that are on this  
11 page will outline a summary of the actions that would  
12 happen in each one of those specific polygons.

13         So, what I like to say to people is, "If you don't  
14 want to read the" -- I forgot what it is -- "800-page  
15 report, and you're interested in a particular set of  
16 natural areas, this is the place you want to go, the  
17 last page of each chapter."

18         So, in general, just kind of summarizing overall  
19 what the plan talks about, particularly focusing in on  
20 impact areas and summaries of more, say, controversial  
21 items, if you will, in the category of trees and  
22 vegetation, the plan identifies places for the  
23 reintroduction of sensitive species for local  
24 conservation purposes, and those are listed species as  
25 well as locally significant ones; reduction of invasive

1 plant cover, revegetation and replacement of trees and  
2 vegetation where invasive species are removed.

3         So, in the category of invasive trees, this is  
4 primarily the Tasmanian Blue Gum, and we've estimated  
5 that there's something like 64,000 invasive trees in  
6 these natural areas. Again, that's an estimate.

7         The plan identifies approximately 3400 of those to  
8 be removed. These numbers are rounded, and so, 95  
9 percent of them, essentially, to remain. And in  
10 Pacifica, in the upper watershed, where you've got much  
11 higher, in many ways, conservation value, the  
12 recommended numbers of trees to remove are much higher,  
13 so 28 percent of the trees in the upper watershed.

14         In the category of "Animals and Wildlife," there's  
15 "Improving Habitat for Sensitive Species." So, I know  
16 there's people from Pacifica here, and we have a couple  
17 of very important sensitive species down there, but,  
18 also, it talks about more common species that we really  
19 don't find anymore in San Francisco or in very few  
20 places, like the Pacific Horse Frog.

21         Improving wildlife habitat, protecting nesting  
22 sites, and, to a certain extent, to modify -- to  
23 maintain but modify the off-leash dog use in parks.

24         Then "Trails and Access," we mapped approximately  
25 40 miles of trails in a one-square-mile land mass, if

1 you can put your head around that. And the plan  
2 identifies roughly 30 miles of those trails to remain,  
3 and about -- you can't see it very well, but the red  
4 says, "Social trails to close 10.3 miles." So, about 25  
5 percent of the social trails to close.

6 And social trails are shortcuts off of major  
7 trails, maybe they lead from people's backyards. They  
8 often go straight up and down hills and have issues  
9 about erosion and -- and whatnot. And then 1.1 miles of  
10 new trail.

11 So, that is kind of the quick-and-dirty in my ten  
12 minutes.

13 The Management Plan is online on our website on  
14 SFNAP.org. You click on "Natural Areas 20-Year  
15 Management Plan," and it's broken down by chapter, so if  
16 you're interested in a particular natural area, say like  
17 Glen Canyon, you can just click on "Glen Canyon" and see  
18 what the recommendations are, including the maps.

19 That's it. Are there any questions about my  
20 presentation or the Management Plan?

21 MS. KAMALANATHAN: Good evening, everyone. My  
22 name is Dawn Kamalanathan. I'm the Planning Director  
23 for the Recreation and Park Department, and I'm actually  
24 here today just to give a brief update on some  
25 legislation that many of you, or some of you, might be

1 aware of and have some questions on that's been working  
2 its way through the Board of Supervisors over the past  
3 week and actually passed at its second reading at the  
4 full Board of Supervisors.

5         This legislation that was introduced by Supervisor  
6 Mirkarimi directs the Recreation and Park Department  
7 over the next three months to develop three concept  
8 plans for the golf course at Sharp Park, and those three  
9 concept plans, one is keeping the existing 18-hole golf,  
10 the second is a partial -- a 9-hole golf course, and  
11 then some partial restoration of natural habitat, and  
12 the third concept plan is the elimination of golf as a  
13 use at Sharp Park.

14         The legislation further directs that the  
15 Department continue to explore with the GGNRA, and also  
16 consult with the City of Pacifica and County of San  
17 Mateo, to explore options for transferring the property  
18 to one of those entities over the long term.

19         So, I wanted to just kind of give an update on  
20 that legislation and where we are with it.

21         We are moving forward with this analysis, and we  
22 hope to present to the Rec/Park Commission and the Board  
23 of Supervisors our findings at the end of the summer.  
24 But it's important, I think, for folks to understand  
25 that any direction that the Board of Supervisors or

1 Rec/Park Commission gave to the Department with respect  
2 to converting the golf course in whole or in part would  
3 be addressed through a separate environmental review  
4 process from this Significant Natural Resource Areas  
5 Management Plan. So, just to make that clear, those  
6 issues will be addressed through a separate  
7 environmental review process should the Board and/or  
8 Rec/Park Commission feel it's appropriate to give us  
9 direction to pursue a change of use at the golf course.

10           So, I wanted to make that announcement. Okay.  
11 Great.

12           MS. JONES: Sara Jones. I think I'll keep going  
13 without the microphone.

14           Hi, I'm Sarah Jones. I work for the Planning  
15 Department, and the reason that we are involved with  
16 this process right now in Planning is that the  
17 San Francisco Planning Department is charged with  
18 conducting environmental review on all projects, public  
19 and private, within the city of San Francisco or under  
20 the jurisdiction of San Francisco.

21           So, we're moving on now into the discussion about  
22 why we're here tonight, which is the environmental  
23 impact report being prepared on the Natural Areas  
24 Program.

25           We'll go -- and what I'm going to describe to you

1 is just a little bit about what the California  
2 Environmental Quality Act is meant to accomplish and  
3 what you can expect to see out of this process.

4         So, the reason that CEQA exists, the purpose of  
5 CEQA, is to provide information to decision-makers about  
6 potential environmental effects of any kinds of  
7 projects. It is meant to be an informational document,  
8 and it is meant to provide the information that  
9 decision-makers need.

10         Completing a document, an environmental document,  
11 under CEQA, does not indicate any type of approval or  
12 disapproval of a project; it is simply providing  
13 information and public disclosure of the environmental  
14 effects of a project.

15         So, what do we look at under CEQA? What topics  
16 are we going to analyze?

17         You see here a list of 18 -- or 17, separate topic  
18 areas that we are required to analyze. The State sets  
19 this out for us in their guidelines that -- called the  
20 "California Environmental Quality Act Guidelines," the  
21 CEQA guidelines, and that is the State document that  
22 guides us in our work.

23         We have, I believe, some copies of our checklist  
24 that we use. Basically, within each of these topic  
25 areas that are covered, we have several questions that

1 we need to answer on -- in terms -- in order to identify  
2 the potential areas in which a project might have  
3 impact.

4         Some of you might have seen the initial study that  
5 was prepared for the Natural Resource Area Program.  
6 Several of these topic areas were what we call, "scoped  
7 out" in that initial study. What that document allows  
8 us to do is say -- we go through our entire checklist  
9 and determine what areas do not have potential  
10 significant environmental effects, and, you know, put  
11 out the disclosure about that, and then that allows us  
12 to then focus the actual environmental impact report on  
13 the significant impact, so we don't have to get into the  
14 issues that really aren't pertinent to a particular  
15 project.

16         This is an interesting process -- just as a side  
17 note, this is an interesting process for those of us in  
18 the Planning Department, because, I'm sure, as you can  
19 imagine, most of the projects we're looking at are  
20 buildings and projects where we're not too concerned  
21 about things like biological resources or other topics  
22 that are generally not pertinent in San Francisco, so,  
23 that has been an interesting project for us to be  
24 working on.

25         UNIDENTIFIED SPEAKER: I have a quick question on

1 that slide.

2 MS. JONES: Uh-huh.

3 UNIDENTIFIED SPEAKER: Is that what an EIR does,  
4 looks all of those 18 issues?

5 MS. JONES: Yes.

6 UNIDENTIFIED SPEAKER: And answers them?

7 MS. JONES: And answers a number -- there's  
8 several questions within each of those issue areas.

9 UNIDENTIFIED SPEAKER: What about the initial  
10 study? Does that still -- does that go over those 18  
11 items?

12 MS. JONES: It does go over the 18 items, but for  
13 some of the items, it says there are potentially  
14 significant impacts. We're looking at that in the EIR.  
15 So, for some of the items -- and you can see our initial  
16 study either online, we have a copy here, and you can  
17 get copies from us, and you'll see --

18 UNIDENTIFIED SPEAKER: But if they don't do an  
19 EIR, we don't get that. You could stop now.

20 MS. JONES: No, we can't stop now. We can't -- we  
21 can't because we've determined that there are  
22 potentially significant environmental impacts from this  
23 project, so, under CEQA, we are required to analyze  
24 those in the EIR.

25 UNIDENTIFIED SPEAKER: So you'll be doing a full

1 EIR?

2 MS. JONES: Yes.

3 UNIDENTIFIED SPEAKER: And not a mitigated?

4 MS. JONES: Not a mitigated negative declaration.

5 In a mitigated negative declaration, you go  
6 through the same initial study, but under one of those,  
7 you determine that all potentially-significant impacts  
8 can be mitigated to a level of less-than-significant.  
9 So, you have specific measures that you put into place  
10 to say, you know, "This will reduce these impacts."

11 If you can come to that conclusion in your initial  
12 study, then you can go ahead and issue what's called a  
13 "mitigated negative declaration."

14 We did not come to that conclusion in this initial  
15 study, so that is why we put out a notice that said we  
16 are preparing an environmental impact report on this  
17 project.

18 UNIDENTIFIED SPEAKER: And that's here today.

19 MS. JONES: Yeah, that's what we're doing here.

20 UNIDENTIFIED SPEAKER: And you mentioned that some  
21 things were eliminated for consideration. Which of  
22 those 17 things were eliminated?

23 MS. JONES: I am going to let Jessica answer that  
24 question, or John. I don't remember off the top of my  
25 head, so I don't want to say something incorrect.

1 UNIDENTIFIED SPEAKER: And on the list that is  
2 there, where is forestry?

3 MS. JONES: Forestry would come under "Biological  
4 Resources."

5 MR. BOCK: So, actually, most of the resource  
6 areas, because of things like public services, and  
7 mineral and energy resources, just aren't even germane  
8 to the topic. So, the six areas that are right now  
9 being carried forward into the EIR are land-use and  
10 land-use planning.

11 UNIDENTIFIED SPEAKER: Can you speak up?

12 MS. JONES: Yeah. Why don't you --

13 MR. BOCK: So, the first topic area that's being  
14 carried forward into the EIR is number one on the list,  
15 land-use and land-use planning, and that provides some  
16 of the general context for these actions that are taking  
17 place both for the property itself as well as  
18 surrounding land uses for each of the natural areas.

19 We're also carrying forward cultural and  
20 paleontological resources, and further down the list  
21 we're looking at recreation, because that is a central  
22 component of the management of the natural areas; also  
23 looking at biological resources, hydrology, and water  
24 quality. And then, I believe, cumulative impacts is one  
25 of the other topic areas that wasn't a focus of the

1 initial study that will be addressed in detail in the  
2 EIR.

3 MS. JONES: I also want to add that if, upon  
4 review of the initial study, you feel that we have, you  
5 know, missed something or come to -- you know, if you  
6 don't agree with the conclusion, or you think that we do  
7 need to address a point in more detail, that's part of  
8 the purpose of this scoping process. We are scoping out  
9 this next step in the analysis.

10 So, that's what -- you know, this is not set --  
11 what we've said in the initial study is not the last  
12 word on the topic.

13 MR. BOCK: I would just add to what I said. I  
14 skipped over "Esthetics"; that's another one that we're  
15 looking at, particularly with regard to the issue of  
16 tree removal. So, we've been doing an initial  
17 simulation to show where there are some of the  
18 large-scale tree removals scheduled that will be part of  
19 the EIR analysis as well.

20 MS. JONES: But these are questions  
21 specifically -- or, generally, about the CEQA process --

22 UNIDENTIFIED SPEAKER: There are questions, yes --

23 MS. JONES: -- but if they're specific to the  
24 environmental review on the project, I'd rather take  
25 them in the scoping time, so --

1 UNIDENTIFIED SPEAKER: Well, my question is: When  
2 you say "we" are doing this environmental review, in the  
3 time the Department normally reviews the scope of  
4 structures, this is an enormously complex subject --

5 MS. JONES: Right.

6 UNIDENTIFIED SPEAKER: -- so when you say "we,"  
7 who's doing it? Is there a consultant or --

8 MS. JONES: We have a consultant. Tetra Tech is  
9 the consultant, and John --

10 UNIDENTIFIED SPEAKER: Who hired them, and what  
11 are their qualifications -- special qualifications?

12 MS. JONES: John Bock, who just spoke, is the  
13 project manager from the consultant, and we reviewed  
14 their qualifications and selected them for the work,  
15 and, you know, you can -- we have detailed information  
16 on their qualifications, and we have their proposal that  
17 is available for review if you'd like to arrange to do  
18 that.

19 UNIDENTIFIED SPEAKER: Was there a competitive  
20 search for other consultants or --

21 MS. JONES: The consultant is actually chosen by  
22 the Recreation and Park Department. The Planning  
23 Department had input into it, but the consultants  
24 are -- -- that's the responsibility of the project  
25 sponsor, so that was -- so they managed that process.

1 UNIDENTIFIED SPEAKER: Did you give any specific  
2 instructions to the consultant?

3 MS. JONES: We gave specific -- once the  
4 consultant is hired, we give specific direction. We  
5 work -- once the consultant is hired, then they're  
6 essentially consulting to us, to the Planning  
7 Department, and we give the direction to them as to the  
8 scope and content of their work.

9 UNIDENTIFIED SPEAKER: And you tell them you'd  
10 like to get through, and you want to cut down acres of  
11 trees, and "You make this happen for us"?

12 MS. JONES: No, that's not what -- that's not our  
13 purpose here. What we're doing is, we say, "Here's the  
14 project that was defined that is being proposed by" --  
15 in this case, a public agency. We say, "This is the  
16 project that is being proposed. Will you give us the  
17 analysis of what the environmental impact of that would  
18 be?"

19 UNIDENTIFIED SPEAKER: And how much does that  
20 cost?

21 MS. JONES: I don't recall the amount of the --

22 UNIDENTIFIED SPEAKER: Who pays for it?

23 MS. JONES: The Recreation and Park Department.

24 UNIDENTIFIED SPEAKER: 800,000.

25 UNIDENTIFIED SPEAKER: Rec & Park is sponsoring

1 it, and they're hiring a consultant?

2 MS. JONES: This is how the consultant contracts  
3 are managed for the Planning Department. We have an  
4 agreement with the consultants that they are reporting  
5 to us and not to the project sponsor.

6 UNIDENTIFIED SPEAKER: Someone just said that it  
7 cost \$800,000. Is that --

8 MS. JONES: That sounds about right.

9 UNIDENTIFIED SPEAKER: And that's coming from the  
10 Park & Rec's budget?

11 MS. JONES: Yes.

12 UNIDENTIFIED SPEAKER: And then you're cutting and  
13 firing gardeners in Golden Gate Park?

14 MR. LA FORTE: Sir, if you have no specific  
15 questions about the content --

16 UNIDENTIFIED SPEAKER: No, sir, I have a specific  
17 question.

18 MR. LA FORTE: My name's Daniel LaForte. I'm a  
19 planner with the Recreation and Park Department. I  
20 manage the RFP process for the Tetra Tech contract. In  
21 their RFP, we did look for special qualifications.

22 MS. JONES: What's a RFP?

23 MR. LA FORTE: Request for Proposals.

24 So, we did go through that process, and we did bid  
25 out this project, and we did -- the Recreation and Park

1 Commission did award the contract to Tetra Tech in  
2 October of 2007. The amount of the contract that was  
3 awarded was, I believe, \$722,000.

4 I'd be happy to share that information with any of  
5 you who ask for it.

6 Again, in the RFP, we did a request for specific  
7 qualifications, and we were looking for specific  
8 consultants that had a background in these kind of  
9 issues. And we felt that after reviewing Tetra Tech's  
10 proposal, that they had met those qualifications and  
11 were certainly qualified to do this work.

12 UNIDENTIFIED SPEAKER: Thank you.

13 MS. JONES: Next?

14 UNIDENTIFIED SPEAKER: At this point, I just  
15 wanted to clarify -- number 13 is "Geology and Soils."  
16 One of the concerns in this program is about the erosion  
17 that happens to be a part of the program, not because it  
18 of it, but it just happens to be a part of it. And I  
19 was really shocked to see that there's nothing  
20 specifically checked off. It is my understanding that  
21 that does not rise to the level in doing all of the  
22 proposed work, that geology doesn't have any --

23 MS. JONES: Well, that's actually -- that comment  
24 is one to raise in the -- when we actually take the  
25 scoping comments.

1 UNIDENTIFIED SPEAKER: Obviously, it hasn't been  
2 raised in any other way; is that correct?

3 MS. JONES: It was analyzed in the initial study.  
4 I don't recall off the top of my head what the  
5 conclusion in the initial study was, as to whether it  
6 was a --

7 UNIDENTIFIED SPEAKER: I want to make sure,  
8 because I'm curious.

9 MS. JONES: The initial study reached the  
10 conclusion that geology would not result in significant  
11 impact. Again, if you disagree with that conclusion,  
12 then raise it in the scoping comments, and we'll revisit  
13 the topic in the context of the EIR.

14 Yes?

15 UNIDENTIFIED SPEAKER: Was number 15, the  
16 "Hazardous Materials" --

17 THE REPORTER: I can't hear her.

18 MS. JONES: You know what? Again, this is just  
19 about the general CEQA process right now, because -- the  
20 reason that I'm trying to hold it to that is that  
21 there's a certain -- once the comments are made on the  
22 scoping, that's what's in our record and that's what  
23 we're dealing with, and we have to make sure we capture  
24 everything, and also, that's a comment period.

25 So, I want to give people an opportunity to ask

1 questions about the general environmental review  
2 process, but if you have specific issues about the  
3 review for this project, the next item on the agenda  
4 will be the opportunity to raise that.

5 UNIDENTIFIED SPEAKER: I'm sorry. Could you tell  
6 us what numbers you're going to be covering? Is it  
7 going to be mentioned again?

8 MS. JONES: Yeah. You know what --

9 MR. BOCK: Yeah, so there are -- the six topic  
10 areas that are being carried forward in the EIR are  
11 number one, land-use and land-use planning, number two,  
12 esthetics, number four, cultural and paleontological  
13 resources, number nine, recreation, number 12,  
14 biological resources, number 14, hydrology and water  
15 quality. And then outside of those specific resource  
16 topics, we'll also be looking at the cumulative impact,  
17 which will be looking at the impact of this project on  
18 what other projects are happening around the natural  
19 areas, and looking at the -- this total impact resulting  
20 from this combined action.

21 UNIDENTIFIED SPEAKER: Wind and shadow is not  
22 covered?

23 MR. BOCK: Wind and shadow, and all the other ones  
24 that I didn't mention, have all been screened out  
25 through the initial study process as being less than

1 significant for -- less than significant and mitigable  
2 impact through the -- that initial CEQA review process.

3 UNIDENTIFIED SPEAKER: Okay. Thank you.

4 MS. JONES: Just to -- you know, just to add, it  
5 is -- you know, if you want to take the opportunity, we  
6 still have about two weeks left in the scoping process.  
7 If you want to take the opportunity between now and the  
8 end of the scoping period to review the initial study, I  
9 know it's kind of onerous because it's a fairly thick  
10 document, but the best way to -- the most effective way  
11 to comment on the EIR scope is to review what the  
12 conclusions were in the initial study, and if you do  
13 that, you can submit your comments in writing. There's  
14 no different weight given to written versus oral  
15 comment, and you can -- you know, you can submit us a  
16 dissertation in written comments, and -- there's no  
17 limit.

18 So, I definitely encourage people to take the full  
19 opportunity that the scoping period offers to do that.

20 I'm going to move on and finish up this part, and  
21 then we can get to your comments.

22 This outlines the steps in the CEQA process. This  
23 is a brief version of this handout, which is available  
24 up at the front.

25 We are at the -- at the top bullet, there's a

1 "Notice of Preparation and Initial Study," and we are  
2 holding this scoping meeting to provide people the  
3 opportunity to comment orally if they wish to do so. We  
4 will take all of the comments that we receive during  
5 this scoping period, both written and oral, and take  
6 them into account in our preparation of the next  
7 document that we're preparing, which is the draft  
8 environmental impact report, and that's the document  
9 where we go into detail on those potentially-significant  
10 impacts, and discuss them, and look at alternatives to  
11 the project that would reduce or avoid, you know, some  
12 or all of the potentially-significant impacts.

13           We also have to look at a no-project alternative  
14 in terms of what would result if this project does not  
15 go forward.

16           We will publish that draft document, and everybody  
17 will get notice when it's available, and there will be a  
18 public hearing before the Planning Commission on that  
19 document, and, again, another opportunity to submit  
20 written comments, and then we take all of those comments  
21 that are submitted on the draft EIR and respond to them  
22 in writing in a comments and responses document, make  
23 whatever changes to the EIR are needed, and that is --  
24 that modified document with the responses is what is  
25 brought to, again, the Planning Commission for

1 certification.

2           And by certifying an environmental document, what  
3 the Planning Commission is declaring is that the  
4 document is full, and complete, and prepared in  
5 accordance with the requirements of CEQA. So, again,  
6 it's not saying that it's a good project, or a bad  
7 project, or a project that they think should be  
8 approved; they're saying: We did the environmental  
9 review.

10           So, those are the steps that we will be going  
11 forward with over the next several months.

12           Here are some of the logistics. I think all of  
13 this information is available in one way or another up  
14 at the front, but, again, you have until May 26th to  
15 submit your comments. The Notice of Preparation is  
16 available online. If you don't have access to it that  
17 way, you can get in touch with Jessica. She can get you  
18 a copy or let you know where you can go to review one.

19           Also, as Lisa mentioned, you can go to the Natural  
20 Area Program website to actually look at the plan  
21 itself.

22           Your comments are sent to Bill Wyko. He is the  
23 Environmental Review Officer, so he's in charge of the  
24 Major Environmental Analysis Division of the Planning  
25 Department. Send him your comments. If you have any

1 questions, call Jessica.

2         And I think that about covers it.

3         Oh, and we'll just go over the -- how we'll  
4 conduct the public comment period.

5         Again, the purpose of this public comment is to  
6 get your comments onto the record, so we're not  
7 responding to the comments; we're just taking them at  
8 this time, and we'll respond to them in the  
9 environmental document. So, please, you know,  
10 obviously, general sort of kindergarten rules -- be  
11 respectful. Also, speak clearly.

12         We noted here that it's optional to state your  
13 name. Actually, we need you to state your name. That's  
14 the only way we know to be able to follow up with you,  
15 if necessary, and to make sure you get all the future  
16 documents.

17         We're going to have a three-minute time limit  
18 tonight, so if you could adhere to that, that would be  
19 great. And again, if you have more to say, you know,  
20 please submit it in writing.

21         And again, this is about what should be included  
22 in the environmental review document, so it's not about  
23 the merits of the Natural Resources Area Management  
24 Plan; it's about what you think we need to be analyzing  
25 on the environmental side.

1           So, that's it, and we'll get to your comments now.

2           Oh, I'm sorry.

3           UNIDENTIFIED SPEAKER: We still get to ask

4 questions after this or what?

5           MS. JONES: Well, again, if you have any more

6 questions about the general environmental review

7 process, ask them now; otherwise, if you want to talk to

8 me afterwards, that's fine, too.

9           MR. LA FORTE: I'll be coming around, also, with

10 the microphone so that everyone can hear the comments,

11 so I'll be passing around the microphone.

12           UNIDENTIFIED SPEAKER: This is a general question.

13 In terms of the biological resources, will Tetra Tech be

14 relying on information from, I guess, 1995, or will they

15 be doing their own measurements, or what?

16           MS. JONES: They were -- I believe their scope

17 involves -- excuse me, independent information gathering

18 as well.

19           UNIDENTIFIED SPEAKER: What?

20           MS. JONES: Independent information gathering.

21           Since what they're analyzing is the Natural

22 Resources Area Plan, they need to, you know, look into

23 the issues in a different way than they did. But if you

24 have detailed questions about that, you can definitely

25 ask John afterwards.

1 UNIDENTIFIED SPEAKER: One more general question.  
2 What is the percentage of time in the EIR -- final EIR,  
3 that say you have actually incorporated public comment?  
4 Would you know a general percentage?

5 MS. JONES: I'm sorry?

6 UNIDENTIFIED SPEAKER: When people make comments,  
7 it might be worthy of being considered affecting your  
8 final recommendation. Can you tell us what that  
9 percentage of that frequency might be? Five percent of  
10 the time for incorporating public comments? 50 percent  
11 of the time?

12 UNIDENTIFIED SPEAKER: Would you repeat the  
13 question? I'm sorry.

14 MS. JONES: She wanted to know how often we  
15 actually incorporate what is said by members of the  
16 public, and I think it's more -- if there are -- you  
17 know, if there are issues that are relevant to the  
18 environmental analysis that we are not otherwise  
19 addressing, then we incorporate them. You know, it's --  
20 I think probably every EIR we prepare is -- is directed  
21 to some degree by -- to one degree or another by issues  
22 raised by the public.

23 MR. BOCK: And just to build on what Sarah  
24 presented, and what's going to come out of the general  
25 presentation, the purpose for the scoping period of what

1 we're actually trying to do is to scope out the issues  
2 that should be addressed in the EIR.

3         So, we've already gone through that initial  
4 internal process. By comparing the initial study to  
5 that process, we've identified what we think are the  
6 important issues to carry forward into the full EIR  
7 analysis. If you disagree with that, or think we missed  
8 something, or there's additional information that we  
9 didn't incorporate into that analysis that we didn't  
10 identify in reviewing the initial study, then those are  
11 some of the topics that we want to hear about today and  
12 over the next couple of weeks through the period that  
13 Sarah mentioned.

14         As Sarah mentioned, we're not here to vote for or  
15 against implementing the plan. We're really trying to  
16 focus on the environmental issues. That's one of the  
17 reasons we were presenting that slide with those 18  
18 topic areas. If you can make your comments either  
19 specific to those or specific to one individual natural  
20 area, that will focus our analysis on what you wanted to  
21 be addressed in the EIR.

22         And so, as we mentioned, we're going to start off  
23 with the first speaker. If you haven't turned in a  
24 yellow comment -- speaker comment card, please turn it  
25 in to one of the women manning the sign-in table. We've

1 got probably about 15 or 20 folks right now in hand, so  
2 we're going to go through this list, and please, if you  
3 can, keep it to three minutes, and speak as clearly and  
4 slowly as you can so the court reporter can report  
5 accurately all the things you're saying so we can make  
6 our documentation on that.

7           And so, our first speaker will be Richard Harris,  
8 and he'll be followed by Patrick Swain.

9           MR. HARRIS: I'm Richard Harris. I'll be speaking  
10 for the San Francisco Public Golf Alliance.

11           We have questions that I put in an eight-page  
12 letter that I've submitted, and so if any of the  
13 participants here are interested in those questions, see  
14 me, and I'll give you a copy of the letter.

15           I just want our questions on the record. They  
16 have to do with the relationship between this EIR  
17 process and the process that the Board of Supervisors  
18 asked the Park & Rec to look into a possible change of  
19 use of the golf course when we have a serious  
20 environmental question relating to that, and she may  
21 have ran through that area, but if they do anything to  
22 the golf course, that in itself will be subject to a  
23 completely separate EIR than this.

24           So, with that, I will submit my letter, put it on  
25 the record, and thank you very much.

1 MR. SWAIN: Good evening. My name's Pat Swain.  
2 I'm a member of the Pine Lake Park Neighborhood  
3 Association. I was on the Advisory Committee for the  
4 Natural Areas Program, so I met quite a few people who  
5 are here tonight, and I've heard quite a few comments  
6 with regard to the Natural Areas Program over the years.

7 One comment I do have to make is, I'm concerned  
8 that there be any further compromises with regards to  
9 the number of areas within the environmental review. I  
10 would hope at the end of the environmental review, we  
11 would continue to have 32 areas for consideration and  
12 for inclusion in the Natural Areas Program.

13 I specifically live close to Pine Lake Park. This  
14 is a rather large area under consideration. It has had  
15 a capital improvement project take place within its  
16 boundaries in the last three years, and as a result of  
17 that, a lot of the issues that were brought up in the  
18 environmental review were also at least discussed with  
19 the community over the years. Unfortunately, at the end  
20 of that process, not all of them, indeed, have been  
21 maintained, or a lot of the comments or promises made by  
22 Rec & Park lived up to. This has to do with staffing,  
23 but also the result of conflicts within various user  
24 groups.

25 I find the problem with the Recreation and Parks

1 Department, which can be problematic, particularly as to  
2 the Natural Areas Program. I would like it to be the  
3 Parks and Recreation Department in terms of dealing with  
4 natural areas, but that's not necessarily the case.

5 So, there have been a lot of compromises made in  
6 the course of developing the master plan, and I'm hoping  
7 at this point, as you move forward, you'll try to hold  
8 yourself to that document as much as possible.

9 Neglect has taken place, unfortunately, with  
10 regard to enforcement. A lot of the outcome of your  
11 review may not reach fruition in the future. There are  
12 problems with other agencies interfacing with Recreation  
13 & Parks. Last year in Pine Lake Park alone there were  
14 instances where people came in and stole ducks. We've  
15 had problems with off-leash dogs in the lake. The  
16 entire west end of the lake -- the west end of the park  
17 is supposed to be on-leash.

18 We've all tried to mitigate these things and work  
19 together, but the environmental review really does -- it  
20 needs to be tough on some of these issues and realistic.  
21 There's a lack of enforcement on the part of the police  
22 department. So, there are certain agencies that will  
23 fail this process. Rec & Park may be one of them. The  
24 police department certainly will be with regards to  
25 enforcement from historic perspectives.

1           So, I'm hoping in terms of the environmental  
2 impact report you'll be realistic, you'll be strict in  
3 terms of adhering yourself to the management plans that  
4 currently exist, and I'm really hoping at the end of  
5 this what we can find ourselves a way to move forward.  
6 All of us have interests in seeing that these areas are  
7 better. Our off-leash dog friends have interests. They  
8 have activities they want to participate in. They also  
9 have areas they want to see restored, maintained, and  
10 improved.

11           So I'm hoping you can pull all that together in  
12 the context of the environmental impact report. We need  
13 to have significant efforts made to try to improve these  
14 areas.

15           Thank you.

16           MR. BOCK: As I mentioned earlier, if you can keep  
17 to the time limit, that will be appreciated. We want to  
18 make sure everyone that's interested in speaking tonight  
19 gets a chance. Obviously, the speaking forum this  
20 evening is not your only opportunity to comment. You  
21 can fill out one of the comment cards and turn that in  
22 at the sign-in table, or you can send in your written  
23 comments any time over the next two weeks before the end  
24 of the comment period on May 26th.

25           So, our next speaker is Nancy Rosenthal followed

1 by Morley Singer.

2 MS. ROSENTHAL: Hi, I'm Nancy Rosenthal, a 27-year  
3 resident of San Francisco. The last five years I  
4 volunteered with the Natural Areas Program. I came  
5 before you two years ago to promote the NAP, and I'm  
6 here again to encourage you to proceed with the  
7 environmental impact report.

8 The following are concerns I would like the report  
9 to address:

10 Number 1, the fragmentation of natural areas. Our  
11 natural areas should be managed in a coherent and  
12 consistent plan for wildlife, rare plants, and ecosystem  
13 processes. The areas are already fragmented between  
14 different agencies or institutions. Further  
15 fragmentation by designing portions MA1, 2, and 3, and  
16 allowing less restrictions on MA3, will only speed up  
17 the destruction of what's left.

18 Two, evaluate the impact of leaving 95 percent of  
19 the invasive trees in the natural areas.

20 On Mount Davidson, where ground space is open  
21 after last winter's storm knocked down some trees,  
22 several native plants once again sprouted. Removing  
23 more of these understory-killing trees can bring back  
24 native plants and reestablish a healthy and diverse  
25 ecosystem.

1           Three, further evaluate the environmental impact  
2 of off-leash dog use. Ninety percent of dog play areas  
3 are in our significant natural areas. Natural areas  
4 cover only 27 percent of park lands. There should be  
5 room in the other 73 percent of some dog play areas.

6           Number 4, evaluate the impact of trails.  
7 Currently, hundreds of miles of trails criss-cross the  
8 natural areas. Any decision for improving or closing  
9 existing trails should be based on a comprehensive  
10 approach to trail planning. New trails through natural  
11 areas are not necessary.

12           Number 5, evaluate management alternatives for  
13 Sharp Park. The report should provide information for  
14 making a selection that maximizes ecological and  
15 endangered-species management and promotes the recovery  
16 of the San Francisco garter snake and the red-legged  
17 frog.

18           MR. BOCK: Thank you.

19           Our next speaker is Morley Singer, followed by Dan  
20 Murphy.

21           MR. SINGER: I'm speaking for a substantial number  
22 of the neighbors around the Sutro forest, and I will  
23 submit detailed comments in writing subsequently, but  
24 I'm just astounded by some of this process. I don't  
25 mean to malign the good people who are doing a complex

1 job up there, but is global-warming a secret, and the  
2 effect of trees? They take up carbon dioxide and give  
3 off oxygen.

4         There are several organizations around the city  
5 devoted to having more trees in San Francisco. Trees  
6 are precious in any city. It's a beautiful forest. The  
7 light is beautiful, it's full of birds, it's full of  
8 animals, it's full of places to walk. Why not just  
9 relax and enjoy the unique beauty of it? I don't  
10 understand any thought of cutting down trees and  
11 destroying this magnificent forest.

12         The second major item which I'd like to have on  
13 the record is that much of the questions here are a  
14 result of the very powerful mistrust that the neighbors  
15 have of the Natural Areas Program and skepticism of the  
16 Planning Department. We've had previous battles with  
17 the Natural Areas Program over the Past 10 years, and  
18 they've demonstrated a striking indifference and  
19 callousness to neighborhood interests, to try to cut  
20 down all the trees on Tank Hill, and some years ago,  
21 trying to cut down all the trees -- all the trees in  
22 Sutro forest.

23         Just in case some of you neighbors were doubtful  
24 or think I'm extreme, I have a picture here that two  
25 weeks ago a sign was put up at the Belgrave entrance to

1 Sutro forest that says "No Public Access." I have a  
2 picture of it if you're doubtful. Now, why would that  
3 sign go up without talking to the neighbors? There's  
4 hundreds of people in the neighborhood walk in there  
5 every day with their dogs and cause no harm in the  
6 forest.

7         The third major item I want to address is using  
8 the threat of fire to instill fear in people. That  
9 forest is always damp. It sucks out water from the fog,  
10 and it's always wet in there. I sail on the bay, and  
11 maybe two days out of the year, the wind comes from the  
12 east; 363 days a year, it comes from the west. The  
13 forest is a windbreak for all of the structures east of  
14 the forest, from Parnassus Street all the way to up to  
15 the top of Twin Peaks, and if you take down the trees,  
16 then the westerly winds would just fan a fire that's  
17 coming from the forest area.

18         There's so many totally cockamamie things, that to  
19 leave out wind effects in the environmental impact  
20 report is striking. It makes me skeptical about the  
21 qualifications and the charts given to the consultants,  
22 like "Get this through at any cost."

23         I don't want to take any more of my time. I'll  
24 submit a detailed comment that the neighborhood is going  
25 to oppose this project. I suggest, to save the taxpayer

1 money, you abort the project now. It's amazing that you  
2 spent \$800,000 on the project when the city is cutting  
3 back on all kinds of essential services.

4 MR. BOCK: Thank you, Mr. Singer.

5 Our next speaker is Dan Murphy, followed by Tony  
6 Belway.

7 MR. MURPHY: I'm Dan Murphy, and I represent  
8 Golden Gate Audubon Society.

9 Golden Gate Audubon supports restoration of  
10 habitat for wildlife, particularly birds. The tree --  
11 I'll just make a number of points here, basically.

12 The tree removal is necessary. We only support it  
13 during the non-nesting season, and we believe trees such  
14 as those used by colonial birds like herons and  
15 cormorants should be preserved. So should trees used by  
16 hawks and owls for nesting. We urge that habitat that's  
17 necessary for birds, such as California quail, Spotted  
18 Towhee, Wrentit, and other species restricted to coastal  
19 scrub should be established and maintained with the  
20 specific goal of continuing those specific habitat  
21 systems.

22 We support restoration and appropriate management  
23 practices at Sharp's Park that will ensure it as a  
24 viable habitat for red-legged frogs and San Francisco  
25 garter snakes.

1           And finally, we certainly agree that restrictions  
2 on off-leash dogs must be enforced in natural areas and  
3 other groomed areas as the earlier speakers mentioned.

4           Thank you.

5           MR. BOCK: Thank you.

6           The next speaker is Tony Belway, followed by Greg  
7 Gaar.

8           MR. BELWAY: My name is Tony Belway. I think I  
9 have a kind of unique perspective to this. I'm a native  
10 to San Francisco. I've lived here for more than 50  
11 years. My wife is a school teacher at Terra Nova High  
12 School in Pacifica. We consider ourselves  
13 environmentalists: Members of the San Francisco  
14 Beekeepers, organic gardeners.

15           I'm also an avid golfer. I believe that we should  
16 not be making choices of golf versus the environment;  
17 that lacks vision.

18           What we do know is that 75, 80 years ago, an  
19 artificial ecosystem was created at Sharp Park. In that  
20 80 years, they built housing surrounding that park for  
21 35,000 people. The golf course and the property around  
22 there is the singlemost important community venue in  
23 that city.

24           Also in those 75 years, we know that frogs,  
25 salamanders, and snakes, that is where they survived, is

1 on the golf course in this artificial ecosystem that was  
2 created with the construction of the golf course.

3         We know that the property was given to the City of  
4 San Francisco specifically for this golf course. It's  
5 not nature. Golf at its best embraces nature, but it's  
6 not nature.

7         So, if you close Sharp Park and tear down 13,000  
8 trees, and tear -- you'll need to also tear down the  
9 seawall if you want to make it nature -- are you going  
10 to have more lizards? Are you going to have more frogs?  
11 You're going to have another artificial ecosystem that  
12 will be different, but you can't tell nature what to do,  
13 and if you go into this thinking that you are going  
14 to -- that golf is an obstacle to make way for nature,  
15 you're just short-sighted.

16         There's room for everybody here. Right now  
17 there's room for the lizards, and the frogs, the  
18 salamanders, and the golfers. I know. I was out there  
19 this weekend. They worked -- the Recreation and Park  
20 Department has done a great job in reducing the use of  
21 pesticides on golf courses, working around the nesting  
22 areas. There can be more that can be done.

23         But I think when you look at the issues that you  
24 brought up about cultural issues, you talked about this  
25 being a community-based deal, have you talked to the

1 community of Pacifica? Believe me, they have their own  
2 very strong points about this. There are nine golf  
3 courses in San Francisco; there is one in Pacifica.

4         And this is their community venue. I know this  
5 weekend there was the major fundraiser for the Terra  
6 Nova High School athletic programs, which was a golf  
7 tournament. Next week there's one for the Cabrillo  
8 School middle school, a music program, another golf  
9 tournament at Sharp Park. It's the only place you can  
10 go and have a banquet just about in the entire city.

11         Yes, you need to work to restore habitat. I  
12 believe that. But I don't think that golf is an  
13 obstacle, and any solution to this that doesn't include  
14 golf, lacks vision.

15         MR. BOCK: Thank you for your comments.

16         Our next commentor is Greg Gaar, followed by Jack  
17 Rauch.

18         MR. GAAR: My name is Greg Gaar. I'm with Nature  
19 in the City, and I've been volunteering for the Natural  
20 Areas Program since it started in 1997. And when you go  
21 out and work with the Natural Areas Program, you learn  
22 about the impact of the invasive trees, the off-leash  
23 dogs, the non-native plants, and you realize that we're  
24 running out of time to save San Francisco's natural  
25 areas.

1           So, my concerns may be similar to other people who  
2 will speak here tonight, but I would like to know what  
3 the environmental impacts are of leaving 95 percent of  
4 the invasive trees in our natural areas. If you go to  
5 areas where you have dense eucalyptus, dense cypress and  
6 pine, you'll find there's no biological diversity in the  
7 understory because the shading, the fog drift, it  
8 destroys the native plants that have been there for  
9 hundreds of thousands of years.

10           Ninety percent of the off-leash dog areas in San  
11 Francisco are in the natural areas. We need to reduce  
12 some of the off-leash dog areas.

13           I love dogs. I get along better with dogs than  
14 people, as a matter of fact, but if we're going to save  
15 the less cuddly critters, like the alligator lizards,  
16 the native birds, the garter snakes, we need to reduce  
17 the off-leash dog areas in our sensitive natural areas.

18           I'm concerned about the cutting of new trails  
19 through sensitive natural areas -- a mile and a half of  
20 new trails to be constructed. I would like to know the  
21 environmental impact of cutting new trails through  
22 wildflower fields and how that will have an  
23 environmental impact.

24           The management plan has already been heavily  
25 compromised during a process over the last three or four

1 years, and you need to take that into consideration.

2           And finally, as we have in all environmental  
3 impact reports, I would like to know what the  
4 environmental impacts of a no-management plan  
5 alternative. I mean, I think that's required in the  
6 plan.

7           Thank you very much.

8           MR. BOCK: Next up is Jack Rauch, followed by Jake  
9 Sigg.

10          MR. RAUCH: I don't think I'll need that. Thanks.

11          My name is Jack Rauch -- that's spelled  
12 R-a-u-c-h -- and I live in Pacifica, and I'm also a  
13 member of San Francisco Archers, which has an archery  
14 range there in the Sharp Park property that  
15 San Francisco has in the Sharp Park area.

16          I'd like to say a number of things, but, first of  
17 all, thanks for the coffee this evening. That was very  
18 nice of you.

19          Another is that I'm encouraged by the fact that  
20 you got an outside organization to look at this closely.  
21 It saves us from pseudoscience, and people with their  
22 own agendas, and people who never saw a piece of land  
23 they think didn't belong to them and they should have  
24 control over it.

25          Sharp Park was donated to San Francisco for

1 recreational purposes, and I'm glad to see that the  
2 focus -- some focus will be there. I'd like to see that  
3 as a foremost consideration. Obviously, I'm an archer  
4 and not a golfer, but the people who donated it to San  
5 Francisco wanted it to continue in that fashion; that's  
6 why they gave the land to San Francisco, for  
7 recreational purposes.

8         There's no reason why changes can't be made that  
9 will accommodate the preservation of species and also  
10 the preservation of golfers. Archery, by its very  
11 nature has a very low impact on the environment, and so  
12 our ox isn't being gored here, but I think that, you  
13 know, really, recreation ought to be something that's  
14 very closely looked at. The benefits of it to all of us  
15 are enormous.

16         I want to thank you very much.

17         MR. BOCK: Next is Jake Sigg, followed by Nancy  
18 Stafford.

19         MR. SIGG: Jake Sigg, California Native Plant  
20 Society.

21         The issue of trees, you mentioned 64,000 trees in  
22 the natural areas.

23         UNIDENTIFIED SPEAKER: I can't hear you, Jake.

24         MR. SIGG: Adolph Sutro did not plant that many  
25 trees. They have been increasing by reseeding

1 reproduction for many decades now, and so much so that  
2 they're imperiling their own health. They're way too  
3 crowded; for their own benefit, they need thinning. And  
4 I think that the EIR ought to consider the impact both  
5 on the trees themselves, but more particularly on the  
6 biodiversity. Every year that passes, there are fewer  
7 and fewer native plants and more and more weeds. And  
8 trees can be weeds, too.

9           So, you know, most of that is lack of funding, but  
10 we need to reverse that trend, and we need to consider  
11 cutting far more than the minuscule amount of trees.  
12 64,000 is really absurd.

13           Somebody said 90 percent of the dog-play areas on  
14 RP land are in natural areas, and what the hell is the  
15 this program for? We're supposed to be preserving our  
16 heritage, our natural heritage, and yet we're letting  
17 this stuff go on.

18           So, that should be addressed.

19           In terms of Sharp Park, we need to select the  
20 restoration alternative that maximizes the probability  
21 of protecting the snakes, that they will recover, so  
22 that the protection by the Native Species Act won't be  
23 necessary.

24           The red-legged frog used to be the Jumping Frog of  
25 Calaveras County. A lot of plants and animals are

1 becoming endangered because their habitat is strange.  
2 We need the maximum alternative in Sharp Park, and I  
3 think that would be a no-golf alternative.

4 MR. BOCK: Thank you. Our next speaker is Nancy  
5 Stafford, followed by Sally Stephens.

6 MS. STAFFORD: My name is Nancy Stafford. I'm  
7 with the San Francisco Professional Dog Walkers'  
8 Association.

9 To modify or -- or loss -- I mean, the  
10 modification or loss of existing off-leash areas is not  
11 acceptable unless you're going to identify replacement  
12 property. 35 to 40 percent of households have dogs  
13 nationwide. In San Francisco, I suspect that number is  
14 closer to 40 percent. As many as 150,000 dogs reside in  
15 San Francisco, and the number continues to grow. How  
16 are you going to accommodate them?

17 Introducing -- I want to address -- the reason  
18 such a large percentage of off-leash areas are next to  
19 natural areas is because dog owners used the land when  
20 no one else wanted to use it. It wasn't good for  
21 building on, no one wanted to go up in the hills, and  
22 the dog owners used it, and now you want to prevent us  
23 from using these areas.

24 Introducing endangered or threatened species into  
25 areas where there are none would threaten active

1 recreational opportunities when open space is at a  
2 premium. The esthetics of tree removal is only part of  
3 the equation when talking about trees. The effects of  
4 the wind patterns, existing species, erosion, all needs  
5 to be investigated; geology and soils need to be part of  
6 the equation; and hazardous waste should be considered  
7 because -- hazardous waste and materials should be  
8 considered because the Natural Areas Program has used  
9 pesticides to control invasive species.

10 I think that, overall, while I think saving native  
11 plants is very important, and I support the program, I  
12 think the program is too large to be successful. I  
13 don't think it's cost-effective or practical in its  
14 current situation. One-third of park land is a lot to  
15 take away from such a large urban area.

16 Thank you.

17 Oh, and I support golf in Sharp Park. I think  
18 there needs to be a lot of different uses in that park,  
19 more than just native plants.

20 MR. BOCK: Next is Sally Stephens, followed by  
21 Ethan Elias.

22 MS. STEPHENS: Hi, my name is Sally Stephens,  
23 S-t-e-p-h-e-n-s, and I'm from San Francisco Dog Owners'  
24 Group, and also Golden Gate Heights Neighborhood  
25 Association.

1           Several quick comments: When you talk about -- if  
2 you close areas that are currently off-leash and close  
3 them, you have to look at the environmental impact on  
4 traffic, air pollution, and global-warming, the reason  
5 being that most people walk to their neighborhood park  
6 with their dog. If you close off those neighborhood  
7 parks, they're going to have to drive to a park across  
8 town in order to get to a legal off-leash area. And  
9 Muni and public transit is not an option because you  
10 can't have dogs on the Muni during rush hour. Before  
11 and after work is the normal time for walking your dog.

12           In addition, the EIR needs to look at the effects  
13 of the immediate closures of the off-leash areas that  
14 are called for in this management plan, plus the effects  
15 of future closures that might be affected by an  
16 expansion of the natural areas into the off-leash areas.

17           The 90 percent number, by the way, is wrong. I  
18 believe the management plan is at 80 percent. Still,  
19 it's a significant amount of off-leash that's going to  
20 be lost.

21           In addition, I think that when you look at  
22 recreation as one of your things, you also have to look  
23 at the impact on recreation of the introduction of the  
24 especially threatened native species. What we see at  
25 Sharp Park is that if there's a threatened or endangered

1 species, or even a sensitive species, suddenly the  
2 federal government just gets involved, and we lose all  
3 local control of those areas, and that's not something  
4 we necessarily want to do. We have to make sure that we  
5 retain local control of our local parks.

6         When you get to the impact of removing trees, you  
7 have to look at wind, increased wind, and you have to  
8 look beyond the park itself. All of our parks are  
9 surrounded by densely-populated areas, lots and lots of  
10 trees. In the Golden Gate Heights area, the natural  
11 areas, and Grandview in particular, have lots of houses  
12 right around there. You have to look at the impact on  
13 the homes and the people who live around there of  
14 removing trees on wind. Also erosion is a significant  
15 one in that area, and sand is a significant problem when  
16 ice plant's been removed and it goes into the neighbors'  
17 yards.

18         I think you also have to look at -- the initial  
19 study said that you're going to proscribed burning. You  
20 have you to look at the impact -- potential impact on,  
21 again, these neighboring houses if you have a wildfire  
22 that goes out of control. We get really high winds  
23 there in the afternoon. Any kind of proscribed burning  
24 down there, it can be potentially quite disastrous.

25         And finally, if you actually look at the impact on

1 the -- the impact of increasing mosquito breeding.  
2 That's a real problem at Sharp Park, and that gets into  
3 the issue of these hazardous materials and what you use  
4 to keep the mosquitoes down when you increase the number  
5 and size of ponds and things like that.

6         And finally, just look at the impact of poor  
7 maintenance on a lot of these problems. If you look at  
8 most of these areas now, maintenance is extremely poor,  
9 lots of plants die. So, that may affect future plans,  
10 too.

11         Thank you very much.

12         MR. BOCK: Next is Ethan Elias, followed by  
13 L-Danyielle Yacobucci.

14         MR. ELIAS: Hi, I'm a neighbor near the Mount  
15 Sutro forest.

16         There seem to be a couple of groups that are  
17 clearing, but I think the natural area the Rec people  
18 have already started clearing near the Belgrave entrance  
19 where that "No Public Access" sign is posted, if it's  
20 any indication of what's to come, it looks terrible.  
21 Esthetically, it's a mess. There are stumps left.  
22 Everything's been clearcut. And the neighbors weren't  
23 notified at all.

24         There's a thriving biodiversity of birds in that  
25 area, and it's literally become quite silent now. It

1 was shocking. It was very shocking to go up there and  
2 see it, and the neighbors were completely shocked.

3 It also took away any privacy from one of the  
4 houses right next to the park.

5 I believe in native plants, and I believe in  
6 restoration, but I also believe in a middle ground, and  
7 if these eucalyptus trees were maintained and perhaps  
8 thinned, because some of them are dying, you know, we  
9 might be able to work out something where everybody  
10 could get their needs met a little bit. It seems very  
11 Draconian to me to chop down all the trees and replace  
12 them all with natives.

13 To be truthful, none of us are natives here. If  
14 we wanted to give San Francisco back to the Miwoks, then  
15 I'd understand, but I just think a compromise is  
16 necessary.

17 Thank you.

18 MR. BOCK: Thank you. L-Danyielle Yacobucci  
19 followed by Tom Borden.

20 MS. YACOBUCCI: Hi. Thanks for having us at the  
21 meeting tonight.

22 It's quite shocking you can cut down a tree if  
23 birds aren't nesting in it. I just think that's just  
24 outrageous. I would like the EIR to -- you need to look  
25 into that. If you take these trees down, where are the

1 birds going to nest?

2           Calling a tree a "weed" is another outrageous  
3 statement, with all due respect, I have to say. Maybe  
4 we need to include in the EIR what is a weed and what is  
5 not. That's part of my definitions problem with this  
6 document. The definitions are really lacking.

7           I'm glad to hear that there's going to be a full  
8 EIR. I didn't realize that.

9           I'd like to know what would be the impact of no  
10 non-native animals -- raccoons, possums, cats. If you  
11 remove them all, what will be that impact? How will the  
12 rodent population be affected?

13           Before I forget, habitat loss for humans is being  
14 lost for recreation. It's not just wild animals, native  
15 animals, non-native animals; it's humans, also.

16           I would like the definition of "native." What's  
17 the definition of a "native animal plant"? Is it  
18 determined by when the animal came here, started living  
19 here, transported here?

20           I'd really like the definition of "substantial  
21 effect." It's really important. The study, to me, was  
22 lacking -- very lacking, and I'm -- you know, we need  
23 more.

24           What's the definition of a "predator"?

25           We need definitions. We need all this stuff. We

1 need a really full impact study.

2           With feral cats, how you will implement what's  
3 described in the Quail Plan? It cannot be one person;  
4 it's got to be all the stakeholders.

5           We were told the plan would be left as is in 2006,  
6 and the EIR would answer all our questions, so my  
7 comment was we need a full EIR, so I'm really glad we're  
8 getting that.

9           I already mentioned one person in charge of the  
10 feral cat recovery, or they're calling it the "Control  
11 Plan" now? I don't think it was called the "Control  
12 Plan" and the "Quail Plan." I'll have to go back and  
13 look that up.

14           All's we need is clarity of what the NAP is going  
15 to do, and I don't get it in this study, and the effect  
16 of those actions. Just like somebody said they want to  
17 know what's the effect of keeping the natives --  
18 non-natives, what will the effect be of removing all  
19 those eucalyptus trees? I mean, if they're not healthy,  
20 let's make them healthy. Why do we have to remove them?

21           We need potential impacts of all topics analyzed.

22           Education of the public. That's eventually going  
23 to be done. These materials need to be approved by  
24 public meetings to encourage stakeholders' support so  
25 you'll get support from the public. It can't be

1 materials only from Rec & Park. There are no good  
2 versus bad, which is usually what we hear when the  
3 educational materials come out. Respect for all plants  
4 and animals needs to be nourished and developed.

5 And I do support this plan. I don't support the  
6 scope, and I would support it if this program was more  
7 amenable to working with the neighbors and the public;  
8 that would be great, too.

9 Oh, I'm L-Danyielle Yacobucci, which you probably  
10 can't spell.

11 MR. BOCK: Okay, next is Tom Borden, followed by  
12 Andrea O'Leary.

13 MR. BORDEN: Hi, I'm Tom Borden. I'm here  
14 representing San Francisco Urban Riders. We're a  
15 bicycle advocacy group.

16 We'd like to see bicycle riding off paved roads in  
17 San Francisco parks decriminalized. And I am a criminal  
18 like so many other people in San Francisco. Since I  
19 moved here from 1979 from Palo Alto, I have been riding  
20 my bicycle off the paved roads in San Francisco parks.

21 And my point is that this is a reality, and, you  
22 know, this should really -- bicycle riding off-road  
23 should be decriminalized and managed rather than just  
24 sort of pretending like people don't do it or shouldn't  
25 do it. And that's where we've been working: We've

1 submitted a plan to Park & Rec.

2           And we're responsible people. We like to ride our  
3 bikes in the dirt, and we want to work with Park & Rec  
4 and not be antagonistic.

5           I'd like to say I'm particularly interested in  
6 McLaren Park because it's the best off-road riding in  
7 the city, and I agree with the McLaren Trail Plan in  
8 terms of closures and whatnot, except for the fact that  
9 bicycles are excluded. And I'd like to especially take  
10 issue with this issue MP7 in the McLaren Park plan that  
11 lumps off-road motorcycles and mountain bikes together,  
12 and that's really just -- you know, an off-road  
13 motorcycle has more than a hundred times the power than  
14 a person on a bicycle, and yet an off-road motorcycle on  
15 one pass through the park can leave a rut that you can  
16 follow without even having an Eagle Scout badge.

17           So, I really would like to see those two  
18 separated. Motorcycles do a tremendous amount of  
19 damage. Most of the trails that are marked for closure  
20 that appear on the map are due to motorcycle hill  
21 climbs, and we totally agree with that. We want  
22 sustainable trails that aren't damaged by people riding  
23 their bikes or walking on them.

24           So, really, my -- what I'd like to say is: We  
25 want to work with natural areas, we appreciate natural

1 areas, we don't think trails -- especially narrow trails  
2 going through natural areas, are damaging. And  
3 bicyclists will stay on the trails.

4 Bicyclists will work to maintain the trails. We  
5 have a high level of volunteerism. We've got 500 hours  
6 in on trails so far this year. So, we just hope that we  
7 can work with Park & Rec on this plan.

8 Thank you.

9 MR. BOCK: Thank you.

10 Andrea O'Leary, followed by Peter Brastow.

11 MS. O'LEARY: I'm Andrea O'Leary, Environmental  
12 Quality of Urban Parks.

13 And this has been a long time coming. I'm really  
14 happy to see this finally coming about, and I'm really  
15 glad to see that Rec & Park has selected somebody who  
16 seems to have all the professionalism that we need,  
17 because I think one of the things that's been driving  
18 the whole process has been pseudoscience. Everybody is  
19 an expert here. And so, one thing in this whole  
20 process, which is that whole advisory process, it's  
21 getting so bogged down with this whole thing about  
22 define, define, define. Well, you defined it, now start  
23 all over again, and keep defining it, and define it the  
24 way I want to hear it. And it's just madness. It's  
25 absolute madness.

1           So, it's really good that we are at this point  
2 here.

3           One of the big sticklers on this whole thing is  
4 this whole thing about, well, define "recreation." If  
5 we have 120,000 dogs, then we should have 120,000 acres  
6 for the dogs and dog activities. Well, if that's the  
7 claim, then we should have more playgrounds in some of  
8 these natural areas. We should take some of those areas  
9 that are not being respected by off-leash dog owners,  
10 where boundaries are absolutely irrelevant -- Pine  
11 Lake's a perfect example -- to design berms,  
12 naturalistic-type elements so that dogs know that's a  
13 berm and not go beyond it -- it absolutely does not  
14 work. But a playground has a defined area, which, for  
15 the most part, lots of people recognize. So, if that's  
16 the criteria, then maybe we should really think about a  
17 lot of other recreation. I'm being silly here, but  
18 that's the point, is that has to be scientific.

19           I think that another issue that has to be really  
20 closely looked at are some of the sort of weird things  
21 called esthetics. Well, when I look at Mount Davidson  
22 and I see all that fuzz up there, I don't think that's  
23 esthetically pleasing. When I compare it to the hills,  
24 the natural rolling hills right nextdoor to where some  
25 of our friends on Mount Davidson have been working for

1 years, that's beautiful. You see the contours. You see  
2 the subtleties of that hill that I think are quite  
3 beautiful and quite esthetic.

4 So, once again, what does that mean? Seeing dogs  
5 roaming up there on Mount Davidson may be a beautiful  
6 sight for somebody who likes that activity, but it's not  
7 going to be so beautiful for a lot of other people who  
8 are being displaced because of that.

9 So, I really think that we have to get out of the  
10 emotion of this, and the politics of this, and get down  
11 to the real science.

12 Thank you.

13 MR. BOCK: Thank you. Next will be Peter Brastow,  
14 followed by Marnie Dunsmore.

15 MR. BRASTOW: Thank you very much.

16 Good evening, everybody. I'm Peter Brastow, and  
17 I'm a director of Nature in the City. I also used to  
18 work at the National Park Service and the GGNRA for many  
19 years.

20 So, I wanted to thank the Planning Department and  
21 the Recreation and Park Department for keeping this  
22 critical environmental public process moving forward,  
23 and also I want to thank the Recreation and Park  
24 Commission for authorizing this process in 2006 and  
25 2007.

1 I want to make a quick comment on something you  
2 said, Sarah.

3 A lot of people say this is about an EIR on the  
4 program. It's an EIR on the plan, not on the program.  
5 I often hear people say that. The program's here to  
6 stay; it's not going to go anywhere over my dead body.  
7 The program has been around for a long time, it's  
8 budgeted, and it's wonderful resource for  
9 San Franciscans. So, what we're talking about is  
10 studying the environmental impact of the plan. I just  
11 want to make that clear.

12 So, I want to focus some of my comments around the  
13 science to underscore some of the comments that have  
14 been already made. The Significant Natural Areas  
15 Management Plan is a scientific document by definition.  
16 One of the primary goals is to utilize all the  
17 biological data on the natural areas.

18 THE REPORTER: Could you slow down, please?

19 Could you slow down, please?

20 MR. BRASTOW: I've only got 16 seconds.

21 UNIDENTIFIED SPEAKER: We'll give you time.

22 MR. BRASTOW: Unfortunately, the process is  
23 anything but simple or scientific. Under the guise of  
24 desiring science, back in 2000, when the Department  
25 created a green-ribbon panel of scientific experts, it

1 included people who were experts in ecological  
2 restoration.

3 THE REPORTER: Slow down.

4 MR. BRASTOW: Scientists on that panel explained  
5 that the native non-species increased biodiversity  
6 because they decreased the number of species. They  
7 actually totally homogenized the whole landscape. Then,  
8 under the guise of inserting science into the process,  
9 we have this ad hoc working group who creates this  
10 management framework of MA1's, MA2's and MA3's. Well,  
11 in my opinion, this severely curtails the ability of the  
12 Natural Areas Program to manage the natural areas. I'll  
13 give you one example: Tank Hill, where, by the way,  
14 they weren't proposing to remove all the trees. It was  
15 two trees they were proposing to remove back in the  
16 1990's.

17 UNIDENTIFIED SPEAKER: Actually, four trees were  
18 taken down. There were two more --

19 MS. JONES: Could we give the people an  
20 opportunity to comment?

21 MR. BRASTOW: Where was I?

22 So, Tank Hill, one of the areas identified as MA3,  
23 has still mostly non-native trees and some other  
24 non-native plants. And if we just sort of say this MA3  
25 is essentially off-limits to any kind of ecological

1 management activity, other than sitting there, then  
2 that's not managing the hill in a conservative  
3 biological kind of way to really take care of that  
4 place.

5         So, I urge you strongly to discard the MA1, MA2,  
6 MA3 approach to the Natural Areas Management Plan.

7         And in fact, furthermore, and nobody -- I need to  
8 dispel the myth that we want to return Golden Gate Park  
9 back to the dunes. We're not going to restore that.  
10 But we would like to see what we call a "maximum  
11 ecological restoration alternative" for the Natural  
12 Areas Plan. That doesn't mean removing every single  
13 tree, but that means truly managing other areas of the  
14 plan.

15         Thank you.

16         MR. BOCK: Okay. Our next speaker is Marnie  
17 Dunsmore, followed by Martha Hoffman.

18         MS. DUNSMORE: I'm Marnie Dunsmore with the  
19 California Native Plant Society.

20         I'd just like to comment on the idea that removing  
21 trees will necessarily have a negative impact on  
22 global-warming. A lot of the results on global-warming  
23 and cutting of trees, if those trees are, in fact,  
24 replaced by grassland or another type of ecosystem, then  
25 that effect of global-warming is often nil or, in fact,

1 improved, so we do need to look carefully at that.

2           And I'd also like to comment on -- I love dogs,  
3 I've had dogs all my life, but I am a little bit -- I  
4 live near Glen Park, and I do get a little bit upset  
5 when -- by the end of the summer, in August and  
6 September, especially Glen Park, has so much urine in it  
7 that it's hard to go there, and it really detracts from  
8 the experience for dog-walkers and human beings to go  
9 there.

10           I do think we need to think about kids when we  
11 talk about dogs. Especially when she was small, I  
12 can't -- I've lost count of the hundreds of times that  
13 dogs have been off-leash and just -- often they're very  
14 friendly, and I love dogs and I don't really mind it,  
15 but it does scare me to have a dog just come up and rush  
16 a kid in the face. It just happened to me last week,  
17 actually, in Glen Park. And I have known children that  
18 have been attacked by dogs. They are scarred with  
19 hundreds of stitches on their face. And if you look at  
20 the statistics, it's far greater than you -- you would  
21 be shocked at the number of times that happens.

22           So, a de facto off-leash policy in our natural  
23 areas really needs to be looked at carefully.

24           Thank you.

25           MR. BOCK: Thank you. Next is Martha Hoffman,

1 followed by Paul Koski.

2 MS. HOFFMAN: My thoughts are not too organized.  
3 Basically, I'd like to share the comments of three  
4 people: Ethan Elias, Morley Singer, and L-Danyielle  
5 Yacobucci.

6 I live near the green -- I forget what it's  
7 called. I think it's called the "Interior Greenbelt,"  
8 Sutro forest area, and so that's one of my main areas of  
9 concern. I'm a landscape gardener, and I'm a volunteer  
10 with the San Francisco SPCA, and I've worked up in that  
11 area on feral cat colony management for about the last  
12 six years, and I really don't want to lose that forest.

13 I think one of the concerns I'd like to put in for  
14 your thinking is just animal welfare. And people talk  
15 about wildlife, and I don't know what one person -- or  
16 they probably don't know what I mean when we talk about  
17 wildlife. I have a hunch we may not be talking about  
18 the same thing, like what are good animals, what are bad  
19 animals, et cetera.

20 I think the animals need to be protected, and that  
21 the plan needs to be very sensitive to that, and I think  
22 organizations with expertise about animals, like San  
23 Francisco Animal Care and Control and San Francisco SPCA  
24 need to be very involved in discussions that relate to  
25 any animal issues in the plan. Thanks.

1 MR. BOCK: Thank you.

2 Our next and last speaker is Paul Koski.

3 If you haven't filled out a speaker card and wish  
4 to speak, please fill one out and provide it to me.

5 Thank you.

6 MR. KOSKI: Hi, my name is Paul Koski, and I'm a  
7 30-plus-year resident of San Francisco currently living  
8 in the Merced Heights neighborhood, and I occasionally  
9 volunteer with the Natural Parks Area site where I live  
10 in the City. I've come to enjoy, appreciate and value  
11 these areas in the City. And listening to the comments  
12 that were made tonight, I think it's important that the  
13 Rec & Park and Planning people keep in mind the mission  
14 of Natural Parks Program, and that's another project  
15 program, which is to preserve, restore, and enhance the  
16 remnants of natural areas of the city.

17 And to compromise -- well, to yield to the wishes  
18 of local interests or individuals to the degree that it  
19 compromises the Natural Park Program's mission, I think,  
20 is a serious thing, so I would encourage you, when you  
21 review all of these comments and suggestions, that you  
22 keep in mind the mission of the Natural Areas Program  
23 to -- to maintain these remnants that are so vital in  
24 this very urban environment we live in.

25 Thank you.

1 MR. BOCK: I did miss a couple of comment cards,  
2 so we have next Nancy Wuerfel, followed by Susan  
3 Wheeler.

4 MS. WUERFEL: Good evening. My name is Nancy  
5 Wuerfel.

6 And I'd like to introduce a topic that hasn't been  
7 discussed today. We have not even defined the word  
8 "environment." When I looked up CEQA, I saw that there  
9 was a definition. I don't have it memorized right now,  
10 but I'd like to bring back to the fact that my  
11 recollection says that it's what is there now. And if  
12 we start looking at the fact that what's there now, this  
13 plan is pretty dramatic in changing what we've got.

14 So, number 1, let's go back to the CEQA law and  
15 find out what it intends to protect.

16 Second of all, I'd like to talk about the 340  
17 acres of trees out of the 1100 acres in the Natural  
18 Areas Program. This is extremely important because  
19 you'd have to say to yourself, Why do we possibly  
20 acquire that many non-native trees and put them in the  
21 middle of a Natural Areas Program if indeed natural  
22 areas was defined only as remnants?

23 I read Policy 13. I understand what we're talking  
24 about here, but I've always questioned the need to have  
25 our forests inside of the Natural Areas Program that did

1 not consider those trees natural. They're not made out  
2 of plastic. For Pete's sakes, they weren't here back at  
3 some arbitrary point in time, but they're here now.

4         So, I think we've got a major issue. If the  
5 natural areas does not embrace our forests, then cut  
6 them loose. Take them out of the natural areas. Let  
7 them be guided by the Urban Forestry Department or a  
8 division within Rec & Park; then we'll end up having  
9 just a reduction down to a mere remnants, and then we  
10 won't have the arguments we've got here today.

11         But when you look at taking the Natural Areas  
12 Program and having the trees reduced so that they can  
13 become grassland, that's where this conflict starts with  
14 the trees. And I'd like to recommend that Tetra Tech  
15 very quickly start adding to the budget, if you need to,  
16 and you get a forester out there so we can start looking  
17 at erosion impacts.

18         And we're not just talking about esthetics. We're  
19 talking about a lot of very important issues, starting  
20 with what I just said, which is why you think that it's  
21 important to have the forests under the jurisdiction of  
22 people that don't like them.

23         Thank you.

24         MR. BOCK: Thank you.

25         And I understand that Susan Wheeler is not

1 present. So, if there are any other comment cards that  
2 I missed, please bring them up now; otherwise, we'll  
3 move forward with concluding our presentation this  
4 afternoon -- or this evening.

5       Okay. I want to thank everyone for coming out. I  
6 know it's a weeknight and not the easiest location to  
7 get to, but we appreciate your coming out with comments.

8       You still have two weeks to submit comments. You  
9 have address information on your agenda.

10       Your comment cards will go out.

11       There's also another meeting Thursday night down  
12 in Pacifica, so if you didn't get a chance to say all of  
13 your comments this evening, you can appear there as  
14 well.

15       And goodnight.

16       (Meeting concluded at 8:30 p.m.)

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STATE OF CALIFORNIA )  
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ss.

I, Katherine A. Cuellar, CSR No. 3164, a  
Certified Shorthand Reporter in and for the State of  
California, hereby certify:

That the foregoing proceedings were taken  
before me at the time and place therein stated and  
thereafter transcribed into typewriting under my  
direction; and I hereby certify that the foregoing is a  
true record to the best of my ability.

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KATHERINE A. CUELLAR, CSR No. 3164  
DATED: May 12, 2009

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SAN FRANCISCO PLANNING DEPARTMENT

NATURAL AREAS MANAGEMENT PLAN

ENVIRONMENTAL IMPACT REPORT

PUBLIC SCOPING MEETING

PEDRO POINT FIREHOUSE

PACIFICA, CALIFORNIA.

THURSDAY, MAY 14, 2009

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FILE NO.: A303FA7

1 MS. RANGE: We will attempt to start. Welcome to  
2 the Natural Areas Management Plan Environmental Impact  
3 Report Public Scoping Meeting.

4 I see most of you have found the refreshments in  
5 the back. There's also the restrooms located back over  
6 there. As you came in, I hope you picked up an agenda. We  
7 have an agenda, and on the back is a map showing the  
8 significant natural resource areas, 31 in San Francisco, and  
9 then we have Sharp Park.

10 Also is the notice of preparation of the  
11 Environmental Impact Report. This is a one-page notice that  
12 we sent out. We also have for your -- for your information  
13 an overview of the CEQA process and as well as a written  
14 comment form. We encourage you to provide written comments.

15 We also have a speaker card form. We will be --  
16 we will be letting you give public comments, so please fill  
17 out a speaker card and hand it over to the ladies in the  
18 back over here, and when we open it up for public comment,  
19 we will call you by the speaker cards.

20 My name's Jessica Range. I'm with the  
21 San Francisco Planning Department, and I am the EIR  
22 coordinator for this project. With me tonight is  
23 Sarah Jones, the supervisor for this project, as well as  
24 Lisa Wayne with the Recreation and Parks Department, and  
25 Daniel LaForte also with Recreation and Parks Department.

1                   We also have John Bock. Where is he? Right there  
2                   in the front. He's the consultant working on the  
3                   Environmental Impact Report.

4                   So the purpose of this meeting tonight is to get  
5                   public comment on the scope of the environmental analysis to  
6                   be within the Environmental Impact Report. What we're going  
7                   to do tonight is we're going to present to you a brief  
8                   overview of the project, and we'll take questions on the  
9                   project at that time. And then we'll give an overview of  
10                  the CEQA process, and we'll give you time to ask private  
11                  questions on the CEQA process, and then we'll open it up to  
12                  public comment.

13                  Please note we do -- we would like you to please  
14                  abide by some ground rules. They're listed over there.  
15                  Just to be respectful. We do have a court reporter here  
16                  tonight to record your comments, so please state your name  
17                  carefully, and it's not optional. Although it does say it  
18                  is optional, we would like to have your name in the record  
19                  so that we can respond. And we'd like you to adhere to the  
20                  time limit and focus the comments on the environmental  
21                  issue.

22                  Also we would like to welcome Julie Lancelle, the  
23                  mayor. Thank your for coming.

24                  MS. LANCELLE: Sure. Thank you. Thank you for  
25                  coming to Pacifica. Thank you very much.

1 MS. RANGE: And with that, I'll turn it over the  
2 Lisa Wayne, who will give you an overview of the project.

3 MS. WAYNE: Can you all hear me?

4 FROM THE FLOOR: No.

5 MS. WAYNE: No. Okay. I think maybe I'll just  
6 stand up and project.

7 My name is Lisa Wayne, and I work for the  
8 San Francisco Recreation and Parks Department, and I'm the  
9 manager of the Natural Areas Program for the City and County  
10 of San Francisco Recreation and Parks Department.

11 What I'm going to do in the next 10-or-so minutes is  
12 give you a really brief overview of this Natural Areas  
13 Management Plan, which I don't have a copy of it. It's  
14 about 800 pages, okay, covers a lot of land, and so bear  
15 with me. We're going to go on a real quick ride through the  
16 nuts and bolts of the plan. And then after my 10 or  
17 15 minutes, I can answer questions about the plan.

18 So natural areas are not unusual, I'm sure, for  
19 Pacificans, what they look like. For San Francisco, they're  
20 remnants of the natural landscape, wetlands and creeks and  
21 oak woodlands and sand dunes. They're habitat for rare,  
22 unique, and endangered species, as well as habitat for other  
23 more common wildlife: butterflies, lizards, salamanders,  
24 et cetera. And they also offer obviously important  
25 recreational benefits, like trails and views and

1 stewardship --

2 FROM THE FLOOR: And golf.

3 MS. WAYNE: -- as well as shoreline access.

4 One of the things I'll mention -- just because I  
5 think I know the crowd here a little bit -- the  
6 Natural Areas Management Plan, as has been defined, is  
7 exclusive of the golf course. And I can show you maps  
8 afterwards if you're interested. They're in the initial  
9 study. So it wouldn't be one of the recreational amenities  
10 that would be recognized in the plan, but we can -- I can  
11 answer questions about that for sure.

12 So here are the natural areas of San Francisco,  
13 the green areas. There's 32 of them overall, including down  
14 here at Sharp Park. There's one that was recently added.  
15 There was 31 when we did the plan, but there's one that had  
16 been recently added here in the middle of the city called  
17 Everson/Digby lots, and they range in size from less than  
18 one acre to a few hundred acres.

19 Here's just some acreage statistics. Overall  
20 there's 1105 acres of these natural areas in both  
21 San Francisco and Pacifica. So about 237 acres essentially  
22 includes the wetlands on the western edge of Sharp Park near  
23 the levy, and lots and lots of acreage past the archery  
24 range and the rifle range up in the canyon east of  
25 Highway 1.

1                   The Natural Areas Program is essentially the  
2                   management group that is responsible for overseeing these  
3                   environmentally sensitive areas. It started in 1997. We  
4                   have a modest staff of seven gardeners, myself, and a  
5                   volunteer coordinator, and the mission of the program is to  
6                   preserve, restore, and enhance natural areas through  
7                   stewardship and volunteerism. And we work with about 13- --  
8                   we have about 13,000 volunteer hours every year. We've  
9                   actually worked with the -- the archers in the last year  
10                  several times. And once we get through all the permitting,  
11                  we look forward to actually working with you folks as well  
12                  on some of this habitat restoration activities.

13                  So the program itself was envisioned as a -- as  
14                  really a volunteer and community-based program and was  
15                  essentially kind of sold to the Recreation and Parks  
16                  Department management in a sense to say, look, if you -- if  
17                  you staff this with a modest number of people, you can bring  
18                  lots and lots of volunteers in to manage these areas. And  
19                  that's -- that is the fact that has turned out to be the  
20                  case.

21                  Just a real brief overview. The plan itself, as I  
22                  said, is an 800-page document, a lot of information.  
23                  Actually, there are many events that happened before the  
24                  preparation of this plan, so I'll briefly go through that.  
25                  The general plan for the City of San Francisco has an open

1 space element that defined the protection of these natural  
2 areas and some general objectives around how to manage them.

3 Our Recreation and Park Commission in 1995 adopted  
4 significant Natural Resource Areas Management Plan, which is  
5 kind of further flushed out those initial objectives in the  
6 policy to 2.13. And then in 1998 we began this process of  
7 developing this -- this big plan that is the subject today,  
8 that is basically the subject that we're going to talk about  
9 today.

10 So actually this is an old slide. So it's been  
11 about now 10 years to develop. The -- in June, 2002, there  
12 was a citizen task force draft and was reviewed by an  
13 advisory committee, couple of advisory committees. They  
14 gave input. Then in 2005, created another draft, which had  
15 a six-week comment period. We held three workshops, of  
16 which I know that there was Pacificans that came to those as  
17 well, and we had 2,700 comments on this plan.

18 And what came out of that is what we're talking  
19 about today, this final draft plan that was published in  
20 February of 2006 in our commission. Basically our governing  
21 body, our board, adopted this plan as the project to undergo  
22 environmental review, which essentially brings us to today.  
23 We are initiating this environmental review today.

24 The management plan goes through a number of  
25 goals. There's conservation, restoration, education,

1 research, stewardship, all the way down to design,  
2 aesthetics, and safety. So it covers a broad range of  
3 topics and goals. So in the conservation arena, for  
4 example, it identifies, you know, the need to control  
5 invasive species and restore wildlife habitat, as an  
6 example, where to promote environment education with school  
7 groups and with universities to conduct research, for  
8 example.

9 So more specifically what the management plan did  
10 was we inventoried all these lands, looked at all of their  
11 biological resources, so all the plants and animals, what  
12 was there, whether they were sensitive or just common  
13 species. We looked at the geology, the hydrology, where the  
14 water bodies were, for example. And those are the main  
15 topic areas. And then I think -- sorry -- trails and sort  
16 of social uses.

17 Then among the kind of objectives that are  
18 attempted to achieve in the management plan is to develop  
19 recommendations for improvement of wildlife habitat,  
20 sensitive species, to prioritize these areas because, of  
21 course, it's 1100 acres. It's a lot of land with a modest  
22 number of people trying to achieve these -- these  
23 objectives.

24 So this plan helps to prioritize activities,  
25 identify impacts to natural resources, guides recreational,

1 you know, development and encouragement of recreational uses  
2 of these lands.

3 So the plan is organized into essentially six  
4 chapters, but Chapter 6 has many, many subchapters. One of  
5 each for each one of the 32 -- 31 natural areas. So there's  
6 a number of sort of characterization chapters, introductory  
7 chapters, that really describe the biology, that describe  
8 the soil conditions.

9 So general recommendations in this Chapter 5, and  
10 then site specific recommendations in Chapter 6, and try  
11 to -- I can maybe even give you the citation for where you  
12 find Sharp Park, if you're interested in that. So in that  
13 Section 6 is where the -- you would go if you wanted to see  
14 exactly what would be proposed for Sharp Park, within that  
15 subchapter.

16 So as I said, the natural areas, there's  
17 1100 acres of subdivided by priority, basically based on  
18 their sensitivity or conservation importance. So the most  
19 important areas are characterized as Management Area 1. The  
20 least important from the standpoint of conservation are  
21 Management Area 3's.

22 So for example, endangered species habitat here in  
23 Sharp Park, for example. So the wetlands of Horse Stable  
24 Pond and Laguna Salada on the western edge of the golf  
25 course would be a Management Area 1 because, of course, it's

1 habitat for San Francisco garter snake and the California  
2 red-legged frog. Similarly, up in the canyon we have a  
3 little bit of grassland habitat that's -- that's habitat for  
4 mission blue butterfly, also an endangered species.

5 Management Area 2 is kind of the middle road.  
6 These would be the creek system that runs through the  
7 archery range and all the way back into the canyon, as well  
8 as some of these nice woodlands and scrub areas in the upper  
9 canyons. And for example, Management Area 3, for -- and the  
10 purposes for Sharp Park really are the -- the large, dense  
11 stands of eucalyptus that are pretty devoid of biological  
12 diversity, and we don't have endangered species or rare  
13 species associated with them.

14 So if -- if you are interested in kind of just a  
15 snapshot view of a particular natural area and what is  
16 recommended, I try to point people to this plan, which is  
17 in -- it's the last -- the last map, the last page of each  
18 natural areas chapter in the plan, and breaks up the natural  
19 areas into these coded red, the gold, and the green, based  
20 on those priority areas that what we call management areas  
21 or MA 1's, 2's, and 3's. And then down here in the box it  
22 has a code so that each one of those boxes corresponds to a  
23 place on the map. It will give you a description of what is  
24 proposed for that particular area.

25 So I'm going summarize just a few -- a few of the

1 many, many recommendations of this plan. So in the category  
2 of Trees and Vegetation, the plan identifies the  
3 re-introduction of sensitive species for local conservation  
4 purposes. So these would be listed species as well as  
5 locally significant species. They're reduction in the plant  
6 cover, including the -- the invasive blue gum Tasmanian  
7 eucalyptus tree, and revegetation or replacement, planting  
8 with native plants where the invasive species have been  
9 removed.

10 So in San Francisco the recommendations for tree  
11 removal are this -- so these are, again, this is all the --  
12 the Tasmanian blue gum eucalyptus. There would be  
13 approximate -- there's approximately 64,000 blue gum  
14 eucalyptus in San Francisco. These are, again, approximate  
15 numbers. We would be proposing to remove about 5 percent of  
16 those, leaving about 60,000 trees.

17 At Sharp Park in the upper canyons, there's a  
18 proposal, much more aggressive proposal on eucalyptus tree  
19 removal at about 28 percent. And one of the things I want  
20 to say about that is we defined trees in this regard as any  
21 tree over 15 feet tall, which for a blue gum eucalyptus can  
22 mean a three-year-old tree that's about this big around in  
23 diameter. So many of these trees are really, by most  
24 accounts, saplings.

25 Also on this, you know, there's no identified

1 funding for this kind of scale of restoration at this point  
2 in time for -- for the management plan. So the idea here on  
3 the tree removal would be a very gradual replacement of  
4 those eucalyptus trees over -- over time, like over, like,  
5 say, a 20-year period.

6 So in Animals and Wildlife, improve habitats for  
7 sensitive species, some re-introductions. For example, the  
8 common Pacific chorus frog, which is dwindling all over the  
9 Bay Area, is not a listed species or anything, but it is  
10 disappearing in all these natural areas. Improving habitat  
11 for local wildlife, protecting nesting sites by not doing  
12 vegetation during breeding -- breeding season for birds. So  
13 these are a number of recommendations to help support  
14 wildlife.

15 And then in Trails and Access, the plan identifies  
16 a total of existing trails of 40 miles of trails, and that  
17 is essentially 40 miles of trails within one square mile  
18 area land mass. So quite a lot of trails, and many of  
19 those -- or at least a quarter of them are identified as  
20 social trails. So these are minor trails. They're  
21 shortcuts. They tend be, you know, straight up and down  
22 slopes, difficult to access. If you have been involved in  
23 sort of the Mori Point Trails Forever program, you're  
24 probably familiar with what a social trail is. So the idea  
25 here would be as these main trails are improved, the social

1 trails would be removed.

2 And to view the whole plan, we have the entire  
3 plan on line on our website. We'll show this again later  
4 down -- later down in the presentation.

5 And I guess one thing I forgot to mention was that  
6 within -- because this is covering such a broad area, it's  
7 hard for me to get all the slides of everything for  
8 Sharp Park.

9 So the -- in the category of Wildlife, the  
10 recommendations within the Natural Areas Management Plan  
11 really deal with trying to improve -- to dredge the  
12 sedimented channels within the wetlands to improve the water  
13 flow, to solve the flooding problems and also provide, you  
14 know, the benefit to the -- particularly the California  
15 red-legged frog.

16 Because one of the situations there is that  
17 because the waterways are clogging up with sediment, the  
18 cattails are those reeds, those reed-looking plants, are  
19 becoming more and more prevalent, and we're losing the open  
20 water around -- at Horse Stable Pond and Laguna Salada. And  
21 that is -- that is a potential negative effect on the frogs  
22 because the frogs need open water breeding sites.

23 So the plan has a number of recommendations like  
24 dredging the channels, creating upland habitat within and  
25 around Horse Stable Pond and Laguna Salada, restoration of

1 some of the ice plant areas with native habitat. Those are  
2 the kinds of things that you'll find in the recommendations  
3 for the biological restoration of Sharp Park.

4 Can I answer any questions on the plan? Yes, sir.

5 FROM THE FLOOR: Talking about the dredging and  
6 getting the cattails -- whatever you want to call them out  
7 there -- it's taken 10 years to get to this stage. How long  
8 do you project when things like that will actually happen?

9 MS. WAYNE: Well, that's hard to say. The  
10 question was how long -- you know, it's taken us 10 years to  
11 get to this point, and how long will it take to actually  
12 address the cattails.

13 This process, the environmental process, will take  
14 about a year-and-a-half and, you know, because there's so  
15 many sensitive resources down there at the lagoon, we have  
16 to be very careful about our permitting. We essentially  
17 can't touch that ground until we get clearance from the  
18 federal and state government that -- that oversees those --  
19 that protects essentially those species. So once we have  
20 those things in place, we do have mechanism, we do have  
21 heavy equipment, we do have resources within our department  
22 to address some of these things.

23 Can we address them all at once? No, because some  
24 of them are going to be bigger than our current capacity --  
25 you know, our current staffing and our current resources.

1 But if you get to that point, Coastal Conservancy has been  
2 interested in that property for a while. I think there will  
3 be other resources that we can bring to bear down the road.  
4 Sorry. It's --

5 FROM THE FLOOR: Why can't the pond be dredged and  
6 still remain a golf course?

7 MS. WAYNE: The pond can't be dredged until we go  
8 through permitting with the federal --

9 FROM THE FLOOR: Right. But if that's on the  
10 table to do that, and there are advocates to close the golf  
11 course because the pond is a natural area, why can't it be  
12 dredged and returned back to more of its natural state, and  
13 the golf course still be allowed to be there?

14 MS. WAYNE: And you know, Daniel LaForte will  
15 maybe take that comment because he's going to actually talk  
16 about the relationship between the current resolution on our  
17 board of supervisors and this plan.

18 But I will say that as it stands now, the project  
19 in the Natural Areas Plan presupposes -- it assumes that the  
20 golf course will stay. So that's the current  
21 recommendation. Now, you know, I can't guarantee that that  
22 will stay.

23 FROM THE FLOOR: Right.

24 MS. WAYNE: If you have questions about the  
25 current activities of our board of supervisor, if you can

1 hold those questions until after Daniel does his --

2 FROM THE FLOOR: Okay.

3 MS. WAYNE: -- but I'll answer any other  
4 questions. Might defer some of them back.

5 FROM THE FLOOR: One question, will a lot of the  
6 environmental work you're doing with heavy equipment --  
7 dredging, pulling down trees -- wouldn't it have more of an  
8 impact on the environment than leaving the natural habitat  
9 the way it is?

10 MS. WAYNE: Well, that's why we need to do the  
11 Environmental Impact Report, to make that assessment.

12 FROM THE FLOOR: But isn't this the plan?

13 MS. WAYNE: There is a plan which is subject to  
14 and --

15 FROM THE FLOOR: We have not undergone  
16 environmental impact at this time?

17 MS. WAYNE: Right. That's what we're starting  
18 right now. That's why we're here today. So hang on. I  
19 think we have some other questions in the back. Yes, sir.

20 FROM THE FLOOR: What is the -- where is the  
21 funding coming from and what is the cost factor?

22 MS. WAYNE: We don't have a full cost assessment  
23 of -- for the whole plan. We have -- currently, I have my  
24 staff, which is those nine folks plus our minions of  
25 volunteers, and we're funded through our Open Space funding.

1 FROM THE FLOOR: Is this to going to cost the  
2 taxpayer money for your project?

3 MS. WAYNE: Is it going to cost the taxpayer money  
4 for my project?

5 FROM THE FLOOR: Everything's taxes.

6 MS. WAYNE: The Natural Areas Program is funded --  
7 it has been funded since the mid 1990's by a -- I think it's  
8 a one-quarter of one cent taxation for every hundred dollars  
9 assessed value property tax. So -- so property owners in  
10 San Francisco pay a very small amount of money to fund the  
11 Open Space fund, of which our program is a very, very  
12 small --

13 FROM THE FLOOR: Is that a definite amount or --  
14 what you're proposing now, or is it going to increase later?  
15 Are we going to get taxed more for -- do you see increasing  
16 of a cost factor?

17 MS. WAYNE: There's a certain baseline that the  
18 Natural Areas Program has funded that's mandated through  
19 Prop C, which passed several years ago for voters of  
20 San Francisco. So there is a baseline support for this  
21 program.

22 FROM THE FLOOR: Will we have any say-so on it,  
23 the taxpayer?

24 MS. WAYNE: On --

25 FROM THE FLOOR: On any increase that you're going

1 to come in with later.

2 MS. WAYNE: We're not bringing forth any tax  
3 increases from this directly. There's no -- I'm not sure --  
4 yeah, if it's going to be an increased taxing, it will be  
5 voter approved, yeah.

6 FROM THE FLOOR: Yeah, I was -- like dredging, how  
7 do you protect the species that are there now when going in  
8 to dredge?

9 MS. WAYNE: Well, that's part of what's going to  
10 be fleshed out.

11 FROM THE FLOOR: What was the question?

12 MS. WAYNE: The question was, if you go in and  
13 dredge, how do you protect the species that are there now?

14 So that's part of what would be detailed in this  
15 Environmental Impact Report. So there's -- you know,  
16 depends on the species you're talking about, but there's  
17 fencing --

18 FROM THE FLOOR: So if you go in and -- like you  
19 say, kind of a map -- if you go in and you take so many  
20 frogs and snakes with you during the project, it's just at  
21 the other side of that they'll gain by doing that?

22 MS. WAYNE: Yeah. Yeah.

23 FROM THE FLOOR: So if you take one on the chin  
24 first, and then down the road it has --

25 MS. WAYNE: That's the only way we would be

1 allowed to do any of the work, if there's a net benefit to  
2 the species.

3 Yes, sir.

4 FROM THE FLOOR: Just got couple of questions.  
5 One, this study that you have, this is as a result of the  
6 over the 100,000-dollar Tetra Tech study --

7 MS. WAYNE: Yes.

8 FROM THE FLOOR: -- their recommendations?

9 MS. WAYNE: So tetra Tech is our current  
10 consultant, and I think the planning department can answer  
11 this more thoroughly for you. But Tetra Tech is our current  
12 consultant, and we had a previous consultant that worked on  
13 this plan.

14 FROM THE FLOOR: And just my follow-up question  
15 is, now that that study has been pretty well completed -- it  
16 was started, I believe, back in 2007 -- is it your  
17 recommendation after having studied that report, looking at  
18 all these things that you're going to do, that by your  
19 recommendations of dredging the pond and doing some simple  
20 things, keeping the golf course intact as an 18-hole golf  
21 course, that this will satisfy the needs of protecting the  
22 red-legged frog and snake?

23 MS. WAYNE: Well, you know, that -- that will be  
24 evaluated in this Environmental Impact Report.

25 FROM THE FLOOR: But you wouldn't be going forward

1 with all these things unless you thought this would be  
2 sufficient to --

3 MS. WAYNE: Yeah.

4 FROM THE FLOOR: -- accomplish those two things?

5 MS. WAYNE: We have been trying to work closely  
6 with Fish and Wildlife and Fish and Game to -- so that we're  
7 on the same page with the regulatory agencies so we're not  
8 proposing things that are way out of whack from what they  
9 would like to see in terms of protections.

10 FROM THE FLOOR: But, again, I'm just asking. So  
11 If you accomplish these things you set forth today and keep  
12 the golf course as basically an 18-hole course, it should  
13 satisfy the needs to protect what we're to trying to  
14 protect?

15 MS. JONES: Okay. Uhm, I'll see if I can answer  
16 that question. I'm with the planning department, and I'm  
17 the supervisor on Environmental Impact Report. The  
18 Environmental Impact Report, which is what we're here about  
19 today is on the Natural Resources Area Management Plan,  
20 which does assume the presence of a golf course.

21 So the golf course issue was not one that was on  
22 the table in the context of that plan. So that -- so this  
23 plan is meant to achieve the objectives that Rec and Park  
24 set out in terms of managing those areas that exist that are  
25 habitat areas. It is not meant to necessarily conclude that

1 those are the ideal conditions in which to maintain a  
2 habitat. That's not the question that's being answered.

3 FROM THE FLOOR: What this plan is making a  
4 recommendation and -- is there a specific recommendation to  
5 keep the 18-hole golf course or not? It's a pretty simple  
6 question.

7 MS. JONES: This plan does not recommend one way  
8 or another. It assumes that a golf course is there.

9 MS. WAYNE: Maybe if you can hold that -- if  
10 there's any more about the plan itself, Daniel will explain  
11 about the relationship to -- the concept that we're looking  
12 at as well.

13 Go ahead.

14 FROM THE FLOOR: What is the primary driver of the  
15 plan?

16 MS. WAYNE: So the primary driver is that our  
17 commission back in 1995 directed our department to come up  
18 with more detailed plans for all these natural areas.

19 FROM THE FLOOR: Why? What objective are you  
20 trying to address?

21 MS. WAYNE: Why do they want us to do a more  
22 detailed plan?

23 FROM THE FLOOR: Right. What --

24 MS. WAYNE: Well --

25 FROM THE FLOOR: -- is the end result that we're

1 driving at?

2 MS. WAYNE: Well, yeah, it's essentially a  
3 conservation document, recreation oriented document. How to  
4 manage -- how to -- what's the future look and use of all  
5 these 31 natural areas.

6 FROM THE FLOOR: Okay. But why are we trying  
7 to conserve?

8 MS. WAYNE: Well, from the City of San Francisco  
9 we have policies in place. I mean, I can throw a few of  
10 them on the slide here. We're required -- we, the city, you  
11 know, city citizenry through, you know, there's the general  
12 plan to protect these places. There's the sustainability  
13 plan from department of the environment. There's a number  
14 of plans and policies in place that the City of San  
15 Francisco says yes, it's important to protect and preserve  
16 and to restore these natural areas. Now come up with a plan  
17 for it.

18 FROM THE FLOOR: There must be an underlying  
19 reason for that, and here's what I'm driving at. People --  
20 Supervisor Mirkarimi, that April 30th meeting, mentioned  
21 that the driver for these arguments was because he was  
22 primarily concerned about the liability that puts  
23 San Francisco -- or that San Francisco incurs if it's not in  
24 compliance with the Endangered Species Act.

25 Now, I did my research, and I said okay, what does

1 the Endangered Species Act ask us to comply with? It has  
2 asks us to comply with concerning threatened or endangered  
3 species on critical habitat. Okay? So next question: Is  
4 Sharp Park -- does it fall under applicable habitat?

5 MS. WAYNE: Okay.

6 FROM THE FLOOR: Looking at -- looking at  
7 documents from the Department of the Interior, it is not.  
8 There are only two units in the San Mateo County --

9 MS. WAYNE: Yeah.

10 FROM THE FLOOR: -- that qualify as natural  
11 habitat. So why are we going through the effort?

12 MS. WAYNE: Okay. So just one thing. This  
13 planned effort is nearly 10 years old. It way predates any  
14 of the recent -- any of the recent meetings or any of the  
15 recent resolutions.

16 FROM THE FLOOR: But there isn't any underlying  
17 reason why we're doing it.

18 MS. WAYNE: And, yes --

19 FROM THE FLOOR: I still don't get what that is.

20 MS. WAYNE: Well, I think I tried to explain that  
21 to you. Maybe we can have a -- a separate conversation  
22 about that afterwards, and I can try to explain more to  
23 you --

24 FROM THE FLOOR: If you tell me you have a policy,  
25 you have to tell me why do you have that policy.

1 MS. WAYNE: Because our decision makers and our  
2 planning department and a lot of people have come forward  
3 and said these places are valuable, and you need to manage  
4 them for their natural resources and their values.

5 FROM THE FLOOR: But there has to be something  
6 that defines its value, and that's what I'm driving at.  
7 What is that?

8 MS. WAYNE: Well, I can show you the -- I can give  
9 you references to those policies and those plans and maybe  
10 that will help you a little bit more.

11 FROM THE FLOOR: Yes.

12 MS. WAYNE: And I think the other thing to just  
13 keep in mind is that the Endangered Species Act is one  
14 driver here, but the other driver here is that the  
15 San Francisco garter snake is a fully protected species by  
16 the State of California. So what that means is that we  
17 cannot touch, we cannot dredge, we cannot solve any flooding  
18 problems, we can't do anything out there in that lagoon  
19 until we have a permission from the State. And the State  
20 will not grant that permission unless it is in the -- it is  
21 in the effort to recover or help that species.

22 FROM THE FLOOR: I think one more point is that  
23 it's a two-pronged criteria. One is that it's a threatened  
24 or endangered species, and second that species exists in a  
25 critical habitat, and that's my point.

1 MS. WAYNE: Yeah. Okay. It's -- you're right.  
2 It does not -- it's not designated as a critical habitat,  
3 but that does not negate what we have to do in terms of --  
4 if we need to do anything on that golf course, we need to do  
5 a recovery effort. And I can -- again, I can explain the  
6 kind of detail that probably other people's eyes are glaring  
7 over -- I would be happy to talk to you about that after.

8 Any other questions on the plan? I'd like to have  
9 Daniel actually talk about --

10 MR. LAFORTE: Can I just mention one thing on that  
11 point. You know, the actions that we're taking in --  
12 related to the Natural Areas Plan, the recommendations of  
13 Natural Areas Plan will actually ultimately benefit the golf  
14 course too. I mean, it will enable us to manage the golf  
15 course better and reduce -- by making improvements to the  
16 hydrology and dredging it out will actually reduce the  
17 incidences of flooding.

18 FROM THE FLOOR: Sure.

19 MR. LAFORTE: So it's a secondary -- a very real  
20 secondary benefit here to what we're doing.

21 Yes?

22 FROM THE FLOOR: Thank you. Where in the process  
23 of looking at these adoptions to the EIR or do -- will it --  
24 will the conversation move around the impact on the  
25 immediate neighborhood to the golf course, especially north

1 of the golf course? The original ancient lake bed of Laguna  
2 Salada extends up into the neighborhood along Palmetto  
3 Avenue (unintelligible) opened floods and insufficient  
4 drainage. It's part of the drain. So we're concerned about  
5 at what point are you addressing the impact to the  
6 neighborhood in these three scenarios and how the EIR  
7 affects it and where when we input those concerns.

8 MS. WAYNE: So I'll answer that in two ways. So  
9 the three scenarios -- that's a good segue, and Daniel's  
10 going to give everyone some background, and we'll come back  
11 to that.

12 The other issue that you mentioned is, you know,  
13 related to flooding, and that's the kind of -- that's the  
14 kind of things that would be evaluated through this  
15 environmental impact.

16 MS. JONES: So when we get to the comment portion  
17 later on, that would be a great comment to make or write it  
18 down and submit it in writing.

19 FROM THE FLOOR: It's specifically what methods of  
20 preventing flooding to the neighborhood would be utilized in  
21 those three scenarios also? Is that part of this  
22 discussion?

23 MS. JONES: That's -- that's -- that's what Daniel  
24 is going to talk about. That's not part of this project.  
25 So that's what Daniel is going to discuss.

1 MS. WAYNE: I think I'll turn it over to Daniel,  
2 and I can answer more questions about the plan, but maybe  
3 this is a good time to have Daniel answer.

4 FROM THE FLOOR: I did have one more question.  
5 It's sort of a two-part question about the plan. That is,  
6 when is the lead contamination at the old rifle range going  
7 to be dealt with? And two, is the archery range going to be  
8 left untouched? Or is that -- that also on the table in  
9 terms of something happening to it as part of this --

10 FROM THE FLOOR: Can you repeat the question?

11 MS. WAYNE: Yeah, the question was -- if I can  
12 paraphrase -- so are there any recommendations for the  
13 archery range, and what's going to happen with the lead  
14 contamination at the rifle range?

15 So those -- so the lead contamination is a  
16 separate project that the -- that our department is working  
17 on, and actually actively working on. I don't know if you  
18 know the timeframe.

19 MR. LAFORTE: Yeah, so -- so our capital  
20 division -- Daniel LaForte. I'm a planner with the -- thank  
21 you, everyone, for coming out tonight.

22 My name's Daniel LaForte. I'm with the  
23 San Francisco Recreation and Parks Department. And just to  
24 comment on that, our capital division has prepared a draft  
25 removal action work plan, and we are -- that is going very

1 well. They are working with various state agencies in the  
2 final stages of getting their permits to implement that work  
3 plan. And I can get you some more information on when that  
4 effort will begin. I believe it's in the near future. So I  
5 think that's going very well, but I can get you more  
6 information on that.

7 FROM THE FLOOR: And the work in the archery  
8 range?

9 MS. WAYNE: Yeah, and the archery range. The  
10 Natural Areas Plan does cover the lands within and around  
11 the archery range. They're -- except, you know, sort of  
12 trail improvements and invasive plant removal and  
13 restoration, there's no -- there are no other  
14 recommendations that would directly affect the archery  
15 range.

16 The pond up there is an important place. As you  
17 probably know, salamanders and -- there's other -- other  
18 important species that use that area. So we do want to be  
19 sensitive on, you know, that area and what happens there.  
20 But in terms of -- there's no plans to change that land use  
21 in any way.

22 FROM THE FLOOR: Thank you.

23 MR. LAFORTE: Excuse me. If there's anyone who is  
24 standing, there are seats up front here if you need to find  
25 a seat.

1 Thank you, Lisa, for that presentation.

2 Again, my name is Daniel LaForte. I'm a planner  
3 with the Recreation and Parks Department. And as many of  
4 you know, there's been a lot of discussion of late on  
5 looking at possible scenarios to the reconfiguration of the  
6 Sharp Park golf course. And I'd like to say a few words on  
7 that and how it relates to why we're here today on the  
8 environmental analysis for the -- the significant  
9 Natural Resource Areas Management Plan.

10 The department was given a mandate by the City and  
11 County of San Francisco Board of Supervisors to -- which  
12 basically says that they mandated three things: one is to  
13 look at possible co-management of the golf course with --  
14 with the GGNRA, and two is to look at possible -- to develop  
15 three concept plans.

16 One -- the one concept plan would look at an  
17 18-hole golf course with maybe slight modifications to the  
18 golf course to improve hydrology as Lisa mentioned. And  
19 that is -- we are looking at that. That is a project  
20 description for the environmental document.

21 The other two concept plans that we are mandated  
22 to develop is, one, to look at a limited golf concept, where  
23 possibly a 9-hole golf course. And then the third, the  
24 concept plan would be to look at no-golf scenario. There  
25 would be no golf there.

1                   And we are undertaking that effort now. We just  
2 begun. We look forward to working with the City of Pacifica  
3 and GGNRA and other stakeholders on the development of those  
4 concept plans. And we should have them developed in the  
5 next few months.

6                   I want to make clear that any action related to  
7 those -- implementing those concept plans, with the  
8 exception of the 18-hole scenario, would require a separate  
9 environmental review. They are not going to be covered in  
10 this environmental review that we're undertaking currently.

11                  And with that -- so I understand there's a lot of,  
12 you know, concern about the future, you know, uses of the  
13 golf course, but I wanted to make that clear that that --  
14 that is -- would be a separate a -- separate process, and we  
15 look forward to working with the City of Pacifica on that.  
16 So thank you.

17                  MS. JONES: Okay. Uhm, now we're going to move on  
18 to talking about what we are actually working on, doing here  
19 under the environmental review process.

20                  My name is Sarah Jones. I work with the planning  
21 department in the major environmental analysis division.  
22 Our division of the planning department is charged with  
23 doing environmental review under the California  
24 Environmental Quality Act for basically all projects that  
25 occur on any lands within the jurisdiction of the City and

1 County of San Francisco. So that is where planning comes  
2 into this -- into this effort.

3 We have a few slides that discuss the California  
4 Environmental Quality Act, or CEQA, as it's commonly called,  
5 analysis process. So I will go through those with you, and  
6 it will also be a little bit of an idea of the documents  
7 that we prepared so far for this project.

8 CEQA is for the purpose of public information. It  
9 is required to conduct analysis under CEQA of the potential  
10 environmental impacts of any projects, you know, whether it  
11 be a new building or whether it even be, you know, some of  
12 the actions that are anticipated under the Natural Resource  
13 Area Management Plan. And the purpose is to inform the  
14 public and decision makers of these potential environmental  
15 effects of their projects.

16 Preparing a CEQA document and certifying that that  
17 document is complete does not constitute approval of any  
18 project. It is simply a required step that one needs to  
19 take in order to make sure that decisions are occurring in  
20 an informed way.

21 We look at a lot of topic areas under our CEQA  
22 analysis. These are spelled out by the State law that  
23 governs CEQA. There are, as you can see, 18 -- or really  
24 17 different types of topic areas that are looked at, and  
25 within each of those topic areas we have several questions

1 that we need to answer.

2 I don't know if anybody here has gotten a chance  
3 to really review the initial study that we prepared, but  
4 you'll see that each of these topic areas is addressed.  
5 Each of the questions within these topic areas are  
6 discussed, and what we have prepared so far for this project  
7 is an initial study. What that is is that we have analyzed  
8 each topic area and identified those topics for which there  
9 are potentially significant environmental effects where we  
10 think there could be substantial adverse effects on the  
11 environment.

12 As you can see, we highlighted the -- and just  
13 to -- back to that -- the areas where we do think there  
14 might be substantial adverse effects are the ones that we go  
15 on to study in the Environmental Impact Report.

16 In the case of National Resource Area Management  
17 Plan, we are going to talk about land uses, land use  
18 planning, aesthetics. That's primarily tied to the issues  
19 around the tree removal that's proposed. We're looking at  
20 cultural and paleontological resources, historic resources,  
21 archeological. That's what's covered under that.

22 Recreation, again, since we're focusing on the  
23 content of the plan itself, that's going to look at dog play  
24 areas. That's going to look at trails, the recreational  
25 activities that occur within the areas now. Biological

1 resources, obviously, is a big topic here. Hydrology and  
2 water quality, where we'll start getting into some of those  
3 flooding issues. And then we also look at cumulative  
4 impacts of this project in association with related, you  
5 know, past, present or reasonably foreseeable future  
6 projects. So that is -- that's what we'll cover in the  
7 Environmental Impact Report.

8 One thing to note right now in the process we're  
9 in the scoping period for this Environmental Impact Report.  
10 Particularly upon reviewing the initial study you feel that  
11 there might be a topic area for which there are additional  
12 issues to discuss or you see a different conclusion, you  
13 know, that's the purpose of this meeting, is to take those  
14 comments, and you can also submit them in writing.

15 So we'll just walk through the process. We  
16 actually have some handouts that go through all the steps in  
17 the CEQA process and maybe help to explain why it always  
18 takes so long. We are right here at the beginning, the  
19 notice of preparation, saying we intend to prepare an EIR,  
20 and the initial study where we do that first read of all the  
21 potential impacts of a project. And today we're having a  
22 scoping meeting, which is required for certain projects of  
23 regional significance like this one.

24 After we get through this process and we conduct  
25 some more detailed analysis of those topic areas I

1 mentioned, we will put out our draft Environmental Impact  
2 Report. That report is circulated to the public. We have a  
3 public hearing before our planning commission. We take all  
4 of those comments that we receive on the draft Environmental  
5 Impact Report, and we prepare a comments and responses  
6 document where we address each of those comments in writing  
7 and also make any changes to the text of the EIR that are  
8 necessary. At that point we are ready to bring a final  
9 Environmental Impact Report to the planning commission to be  
10 certified as being adequate and complete and accurate.

11 Is that the last slide, John?

12 Oh, of course, this is the -- details a little  
13 more how to participate in this current process that we're  
14 in right now. We are in the scoping period. You have until  
15 May 26 to make your comments. Make them orally tonight,  
16 although we have a time limit, but -- so if you have more  
17 lengthy comments to make, then please submit them in  
18 writing. There's no different weight given to anything  
19 that's said versus written. So please feel free to submit  
20 anything in writing.

21 You can actually review the document that we  
22 prepared on our website. You can also, as Lisa mentioned,  
23 review the actual plan on the website that's maintained by  
24 Recreation and Parks.

25 Here's the address to which you can send your

1 written comments, and if you want any more information, you  
2 can contact Jessica. She's the coordinator for the  
3 Environmental Impact Report, and you can also e-mail your  
4 comments to her as well. So that's it.

5 If you have general comments or questions about  
6 the CEQA process, I'm happy to answer them now. If you have  
7 comments specifically about what you think should be  
8 addressed in the context of this EIR, then save them for the  
9 actual scoping period. During that time we just take  
10 comments. We don't respond to questions. So that's --  
11 that's just a tip.

12 I see a woman in the back.

13 FROM THE FLOOR: Thank you, Madam Planner.  
14 General question. I'm sorry. I'm still confused. Must be  
15 a blond moment. Is flooding going to be addressed in the  
16 EIR?

17 MS. JONES: Any flooding that's resulting from the  
18 project would be addressed as an impact in the EIR. The  
19 existing condition of flooding, if there's existing  
20 flooding, that's part of the existing setting, and it would  
21 be described, but it's not an impact of the project.

22 FROM THE FLOOR: What role --

23 MS. JONES: I'm sorry. Did that help? Do you  
24 want to talk more afterwards so -- okay.

25 FROM THE FLOOR: It's just really important that I

1 understand that the issues of flooding, whether it be -- I  
2 mean, the existing flooding and how that originated or not,  
3 and I don't know that -- how that's going to work, just that  
4 flooding is an annual issue out here.

5 MS. JONES: Sure. Well -- and we would look at --  
6 we would look at anything that resulted from the project  
7 that affected that flooding.

8 FROM THE FLOOR: Okay. And the problem as a  
9 result of that flooding extends far beyond defining the golf  
10 course.

11 MS. JONES: Sure. And that's, again, a scoping  
12 comment to make.

13 FROM THE FLOOR: What role does the  
14 coastal commission or County of San Mateo play?

15 MS. JONES: We circulate our environmental review  
16 to those agencies, and they have -- one of the purposes of  
17 this whole process is to provide information to agencies  
18 like that, some of which are decision making agencies, and  
19 some of which are interested agencies. We provide them  
20 information, and they have the opportunity to comment on  
21 what they feel they need to be addressing.

22 Yes?

23 FROM THE FLOOR: Ask you, all the things in the  
24 planning, one thing I notice is missing and -- when do you  
25 do a cost analysis of how to accomplish these things?

1 MS. JONES: Socioeconomic impacts are impacts  
2 under CEQA only to the degree that they result in physical  
3 impacts. So one of the areas where we often address those  
4 kinds of issues is in land use or in population and housing,  
5 although that's not such an issue here, obviously, but  
6 socioeconomic impacts in and of themselves and costs are not  
7 considered physical environmental effects. That's one thing  
8 I didn't make clear earlier on, is that CEQA is looking at  
9 the physical environmental impacts of a project.

10 Yes?

11 FROM THE FLOOR: You mentioned agencies that might  
12 be interested and that you do communicate with. Do you also  
13 communicate with the City of Pacifica in terms of the  
14 Sharp Park area?

15 MS. JONES: Yeah, certainly we do that.

16 Yes?

17 FROM THE FLOOR: Does the EIR incorporate climate  
18 change or global warming?

19 MS. JONES: Yes, that's one of the -- that's one  
20 of the topics we address in all the EIR's -- I'm sorry -- in  
21 all the environmental review processes.

22 FROM THE FLOOR: I wasn't going to speak up, but I  
23 just have one question from what Daniel had stated.

24 MR. LAFORTE: Yes.

25 FROM THE FLOOR: Daniel, you said that the board

1 of supervisors -- the direction that had been provided by  
2 the board of supervisors was to develop the concept plan in  
3 and work with the GGNRA, but I didn't hear -- I know you  
4 said that you work with the city of Pacifica, but I thought  
5 that ordinance had been approved by the board of supervisors  
6 last week said both the GGNRA and the city of Pacifica  
7 and/or the County of San Mateo, so --

8 MR. LAFORTE: Yes.

9 FROM THE FLOOR: -- I wanted to clarify that.

10 MR. LAFORTE: I left that out, yes.

11 FROM THE FLOOR: Okay. Worked very hard for that.

12 MR. LAFORTE: Yes, that was in the legislations.

13 Thank you for mentioning that. Thank you.

14 FROM THE FLOOR: No problem. No problem.

15 MS. JONES: Yes?

16 FROM THE FLOOR: You said you had something like  
17 31 natural areas that you were looking at. How many of  
18 those are CEQA -- are under CEQA that we have to do this  
19 kind of review for?

20 MS. JONES: We -- this environmental review is  
21 looking at all of the natural areas. They're all affected  
22 by the project. But we do CEQA review for everything in  
23 San Francisco. We look at downtown skyscrapers. We look at  
24 every -- everything.

25 FROM THE FLOOR: Of course, what are we looking at

1 for a timeline, then, for what's going to happen in  
2 Sharp Park and, like, McClaren Park? There's so many  
3 different areas to work with, some of them are really big  
4 and some of them are small. You know, when should we expect  
5 the draft EIR?

6 MS. JONES: That's partially going to depend on  
7 what -- what we hear in this scoping process because of  
8 issues are raised that take more analysis than we had  
9 originally anticipated, and that would affect the timeline,  
10 and we are working with the consultant. It's partially --  
11 partially driven by the amount of time that they would take.  
12 I don't -- I can't -- I can't say off the top of my head  
13 what I expect the schedule to be.

14 MR. LAFORTE: I can comment on that. We have a  
15 draft -- a draft schedule, subject to change, as Sarah  
16 noted, but we expect to have a draft Environmental Impact  
17 Report in October, 2010.

18 FROM THE FLOOR: Year-and-a-half?

19 MS. JONES: Yes.

20 FROM THE FLOOR: Yeah, then the question I had,  
21 you're saying that you're responsible for part of the  
22 project you're doing, but then you've been working at this  
23 since 1995. There was no flooding in 1995. So the pond's  
24 been soaking in and getting worse, and so the lack of action  
25 is what's creating the flood. So -- but then you don't have

1 any responsibility for that as long as you're doing studies?

2 MS. JONES: We are looking at the effects of the  
3 project on the setting as it is now. Our baseline condition  
4 is basically what it -- what it is as of April or May, 2009,  
5 but we would certainly as part of that discussion of the  
6 setting discuss what led to that condition.

7 FROM THE FLOOR: It was in 1995 they actually were  
8 doing some dredging, and they stopped. So -- and there was  
9 no flooding at that time. So what I'm saying is that you  
10 let the pond soak in long enough, it's going to fill up the  
11 whole basin eventually. If you haven't finished the study,  
12 then apparently you're not responsible for that  
13 (unintelligible).

14 MS. JONES: That might be either a comment in the  
15 context of the scoping as to something that you think we  
16 need to address, or I think something maybe to discuss with  
17 Recreation and Parks.

18 FROM THE FLOOR: I have something to say with  
19 respect to this point, right. As a geologist, I understand  
20 hydrologic patterns, right. That area that you're talking  
21 about is a drainage area. It's the lowest point where water  
22 will naturally collect. And with water, it brings with it  
23 silt, and that's what's settling inside the pond. With all  
24 of the -- they've developed areas surrounding that point,  
25 water has nowhere to go. But there --

1 MS. JONES: Okay. I'm not trying to cut you off,  
2 but that is -- the comment that you're making right now is  
3 exactly the -- when we're done with the general questions  
4 about the environmental process, that's something to raise  
5 in the -- you know, as soon as we get everyone's questions,  
6 this is something to raise once we open the public scoping  
7 comments.

8 FROM THE FLOOR: Okay. What I don't understand is  
9 how are you going to say that the influence of the project  
10 with respect to water is this, with respect to existing  
11 conditions is this. I don't know how you can make that  
12 demarcation.

13 MS. JONES: I think that my understanding is that  
14 one of the purposes of the project is to address that --  
15 that existing condition. So it would -- to the degree -- to  
16 the degree -- what we are looking at is whether the actions  
17 under the project would result in a substantial adverse  
18 effect, and that is, in this case, an increase in the  
19 flooding. So -- but again, you know, please raise this  
20 issue when we get to the next step.

21 Yes?

22 FROM THE FLOOR: Is CEQA and the management plans'  
23 definition of recreation, does it now include watching a  
24 polliwog develop into a frog, watching a snake slither along  
25 the fork, watching a piece of grass grow as the native

1 species? Does that part now -- is that part of the term  
2 "recreation?"

3 MS. JONES: The term recreation in the context of  
4 CEQA isn't -- that's not specifically defined. What we look  
5 at in terms of recreation in our analysis has to do with  
6 whether -- whether we are affecting or removing some  
7 recreational resource, whether -- whatever -- you know,  
8 whatever -- whatever we may define that to be. And, again,  
9 if you -- if you feel that those -- that that passive  
10 recreation that you mentioned should be considered within  
11 that, then please raise that in the scoping comments.

12 We also look at whether a project would result in  
13 greater use of a recreation area that would -- that would  
14 deteriorate -- that would hasten its deterioration.

15 FROM THE FLOOR: Yeah, maybe I wasn't clear. I  
16 was asking what CEQA's definition is.

17 MS. JONES: CEQA doesn't particularly define  
18 recreation in terms of the specific activities that it  
19 involves.

20 FROM THE FLOOR: Okay. Thank you.

21 MS. JONES: Yes.

22 FROM THE FLOOR: I think the point was well -- the  
23 point there that before 1995, before the reeds were thinned  
24 out, there was dredging there. It's really the city's fault  
25 that we're in this predicament to begin with right now

1 because they dragged their feet for the last 15 years  
2 towards this. What's happening, if the city would have kept  
3 doing what they were doing, we wouldn't be having this  
4 problem.

5 MS. JONES: Okay. And I'm not trying to minimize  
6 any of that commentary. I just -- you know, I think that  
7 that's -- if you feel that that's something that we should  
8 be addressing, then when we open the public scoping  
9 comments, please mention that. I'm sorry.

10 FROM THE FLOOR: Of course, it should be  
11 addressing that. You just brought it up here addressing.

12 MS. JONES: Okay.

13 MS. WAYNE: Maybe I can just chime in there a  
14 little bit. I know there are others in the crowd that have  
15 had a lot of history with the Recreation and Parks  
16 Department here at Sharp Park, and what happened, you know,  
17 within relatively recent -- in the last decade or so is that  
18 a lot of regulatory agencies began to look closely at what  
19 was happening at Sharp Park and the things that we were  
20 doing were in violation of the Endangered Species Act, and  
21 so to do dredging, to -- it affects wetlands, and that's  
22 permitted by the Corps of Engineers through the Clean Water  
23 Act, to do dredging, it potentially harms and kills  
24 endangered species.

25 And in 2005, in fact, our general manager was

1 served with basically a letter that, you know, was  
2 essentially -- what would you say? -- a notice of violation  
3 of the Endangered Species Act, and he and our department  
4 were basically, you know, threatened with severe fines  
5 and/or, you know, imprisonment.

6 So the protection's out there. I know for many,  
7 many years things were done differently, but in recent years  
8 more attention has been brought to that place and -- and we  
9 received, you know, direct communications from these  
10 regulatory agencies that we need to stop what we were doing  
11 out there.

12 FROM THE FLOOR: The point here is  
13 that (unintelligible) San Francisco, this created the  
14 endangered species, not -- the endangered species wasn't  
15 endangered to this extent when they were doing this. It's  
16 only become endangered since they've stopped doing that. So  
17 it was hampered by the -- going by the bureaucratic  
18 regulations really created -- further created the problem.

19 MS. WAYNE: Well, yeah, undoubtedly, the  
20 sedimentation is a real future threat to -- particularly to  
21 red-legged frogs, but -- but those species were categorized  
22 by the federal and state governments as endangered and  
23 threatened many, many decades ago, like, in the seventies,  
24 and, you know, since then. So -- so they have -- they were  
25 identified as, you know, in periled state long, long ago.

1 MS. JONES: One thing also to note is that under  
2 CEQA, we also are required to look at what's called a  
3 no-project alternative, which is a -- what would happen --  
4 what would be the impacts of the project not taking place,  
5 or what would the scenario be if the project did not take  
6 place. So -- just so you're aware of it, we'll be looking  
7 at that as well.

8 FROM THE FLOOR: Actually, that was the -- seem to  
9 be contradictory to what you're proposing. The three  
10 scenarios: leaving the park alone, making a 9-hole course,  
11 or doing other dredging is actually much more harmful to the  
12 environment than leaving it as is.

13 MS. JONES: Well, as Daniel mentioned, the three  
14 scenarios that were -- that were discussed under that  
15 legislation, under Supervisor Mirkarimi's legislation, those  
16 are not part of the project. They are subject to a separate  
17 environmental review project request.

18 FROM THE FLOOR: One last question. If it all  
19 becomes part of the project, where does Sharp Park fit in in  
20 priority versus the other park areas of the group? Is that  
21 priority number one, or where does that fall in the list?

22 MS. JONES: That would be a question for  
23 Recreation and Parks.

24 MR. LAFORTE: That's a good question. There are  
25 really two paths there. There's the EIR, and then there's

1 the separate permitting path that we have to go through  
2 extensive steps to obtain the necessary permits to clean out  
3 and dredge the Laguna Salada, which will -- in the end will  
4 help the flooding problems that have occurred out there.  
5 And once we receive those permits from the government  
6 agencies, we can begin to do that work. It's dependent on  
7 our resources, and I can project -- you know, as we develop  
8 this process and move through the permitting process, we can  
9 have a better understanding of the conditions that we have  
10 to abide by that may, for example, escalate the cost  
11 associated with that work.

12 We can't -- as Sarah alluded to, it's very  
13 difficult at this time to provide estimates on the cost for  
14 a lot of this work, but as we move through the process and  
15 learn what we need to do in terms of protection of the  
16 species, barriers, relocations, you know, we don't know the  
17 full extent of the cost at this time, but we may have a  
18 better -- better answer for you as we move along this  
19 process.

20 MS. WAYNE: One more thing that I'll just add to  
21 that, you know, as you probably know, the golf course at  
22 Sharp Park is, you know, flooded for a good three months of  
23 the year, and you know, a lot of that is related to the  
24 protection of the red-legged frog that, you know, lays their  
25 eggs in Horse Stable Pond. And, you know, what that means

1 is that it's a very difficult situation for us because, of  
2 course, it's -- reduces our revenues.

3 So, you know, when we do get through all of this  
4 permitting, I would think that -- that attempting to solve  
5 some of the flow problems, the hydrologic and sedimentation  
6 problems are going to be relatively high on the Recreation  
7 and Parks Department's radar and priorities because, of  
8 course, you know, the flooding is somewhat related to that  
9 sedimentation and how the water flow happens. And we don't  
10 like the fact that the course closes, you know, for as long  
11 as it does over these periods of time.

12 So of course, our agency is just as, you know,  
13 under siege by all the economic conditions, but it's -- it's  
14 been something that we have been trying to find a solution  
15 to for a long, long time. So I can't guarantee that we  
16 would be out there the next day with our backhoes, but it  
17 is -- it is a high priority for our parks.

18 FROM THE FLOOR: Well, that's what I'm saying.  
19 Seems to me now that Sharp Park has become an issue, that's  
20 becoming priority of this whole project, is now let's do  
21 something with Sharp Park versus all the other wetlands, all  
22 the other areas that are in San Francisco. Now because  
23 Sharp Park has become the focal point, it's now a priority  
24 on all the rest of the projects, which I think is  
25 ridiculous. Why wouldn't the other projects be taken care

1 of before Sharp Park became an issue? Why is this now all  
2 become Sharp Park's priority?

3 MS. JONES: Is the question related to  
4 that Sharp Park is more of a priority than the other  
5 31 natural areas in San Francisco?

6 FROM THE FLOOR: That is the perception.

7 MS. JONES: Oh, I don't think that's necessarily  
8 the case. I don't think -- you know, we -- we're trying to  
9 accomplish a lot of things on an -- on many different fronts  
10 all at once. You know what would be required at Sharp Park  
11 is, you know, can happen -- it would need to happen  
12 independent of, say, the Natural Areas Program staff because  
13 we're not backhoe drivers and, you know, heavy equipment  
14 operators. We're doing other priorities in San Francisco.

15 San Francisco's got a trails bond that is supposed  
16 to fund a lot of trails improvements within the city, and so  
17 they're is that motivating factor there. So it's really --  
18 you know, tempting to go where the resources are. You know,  
19 try to maximize what we can do right now or in the near  
20 future.

21 FROM THE FLOOR: Well --

22 MS. JONES: I think this permitting for Sharp Park  
23 is somewhat more complicated than the permitting that would  
24 be required in other areas.

25 FROM THE FLOOR: When in your timeline do you

1 consider consequences of health issue and safety issues and  
2 compare them with the Environmental Impact Report?

3 MS. JONES: I guess you're going to have to --

4 FROM THE FLOOR: I mean, the isolation of any  
5 health considerations when you are in a group environment.

6 MS. JONES: Certainly --

7 FROM THE FLOOR: And also there's safety issues,  
8 those -- when do all those come together?

9 MS. JONES: Those issues fall under the topic  
10 areas that we discussed.

11 FROM THE FLOOR: We have some blank checklists,  
12 don't we?

13 MS. JONES: If you look at our checklist of all  
14 of -- all of the questions that we're answering or that  
15 we're trying to answer, a lot of them are related to human  
16 health and safety types of issues. So that's -- human  
17 health and safety is an issue under CEQA as much as the  
18 health and safety of non-human --

19 FROM THE FLOOR: So what's a reasonable timeline  
20 to expect?

21 MS. JONES: Well, again, as Daniel mentioned, we  
22 are anticipating publishing our draft EIR around October.  
23 I'm sorry, October of 2010.

24 MR. LAFORTE: I'm sorry. I misspoke earlier. We  
25 are expecting a draft EIR October, 2009.

1 MS. JONES: Okay. I was thinking that's an  
2 awfully long time.

3 Yes?

4 FROM THE FLOOR: One of the things I'm wondering  
5 is that idea that, say, the process is finished and can't do  
6 anything about the dredging in the pond, but we know from  
7 several reports that San Francisco's already done that, the  
8 silting problem, mainly throughout the north end, which  
9 takes all the moss from the highway and roadway and feeds it  
10 into the pond. So why instead of worrying about the frog  
11 and dredging don't you just take care of getting that water  
12 to go somewhere else, get it pumped out.

13 MS. JONES: That would be a question --

14 FROM THE FLOOR: Has nothing to do with frogs.

15 MR. LAFORTE: All of these issues are going to be  
16 looked at in the Environmental Impact Report. We're  
17 performing, you know, hydrologic studies, sedimentation  
18 budgets, imaging maps, a lot of technical studies that will  
19 evaluate the flooding issues at Sharp Park.

20 FROM THE FLOOR: I'm not talking about flooding  
21 issues. I'm just talk back sedimentation --

22 MR. LAFORTE: Run-off sediment.

23 FROM THE FLOOR: -- sedimentation's a problem.  
24 You know where the problem is coming from, the north end of  
25 the park where streets and everything are emptying all their

1 sediment into the pond.

2 MR. LAFORTE: We'll identify the inputs and --  
3 possibly, and, again, that would be analyzed in the EIR and  
4 mitigated for.

5 I should mention that the Natural Areas Plan --  
6 the recommendations in the Natural Areas Plan call for --  
7 call for dredging and clearing out the Laguna Salada. Once  
8 EIR is completed, that will allow us to begin that work. So  
9 we are, you know, taking the necessary steps to take action  
10 at Laguna Salada.

11 FROM THE FLOOR: I'm not talking about dredging,  
12 just talking stopping the water that's going into the lake.

13 MS. JONES: That would be something to suggest in  
14 the context of your comments on the scope of the EIR,  
15 something to look at in our alternatives analysis.

16 Are these still general CEQA questions, or should  
17 we move on to the --

18 FROM THE FLOOR: My question, I think, is more for  
19 Daniel. In terms of the permitting process and the EIR  
20 process, are they on parallel tracks, or do you have to  
21 finish EIR before you can go asking for your permits?

22 MR. LAFORTE: They are on parallel tracks. So we  
23 are -- our goal is to complete them around the same time.

24 FROM THE FLOOR: Okay.

25 MR. LAFORTE: Again, there's a lot of variables

1 involved in that, but that is how we began this effort, and  
2 that is our goal, to have permits in hand around the time of  
3 the EIR is certified.

4 FROM THE FLOOR: Thank you.

5 MS. JONES: In the back.

6 FROM THE FLOOR: If GGNRA comes on board here, do  
7 their rules -- are they -- are their rules going to render  
8 your hard work redundant?

9 MS. JONES: Uhm, other agencies would rely on the  
10 environmental analysis that we are conducting. Uhm, I don't  
11 know what you mean exactly by GGNRA coming on board. What  
12 exactly you're referring to in terms of --

13 FROM THE FLOOR: I see them as kind of a predatory  
14 group.

15 MS. JONES: Oh, in terms of whether they take over  
16 the -- they would -- they would basically need to, you know,  
17 to adopt independently certify the environmental work that  
18 we do.

19 Any more? Oh, hi.

20 FROM THE FLOOR: Yeah, is Supervisor Mirkarimi  
21 aware that you've done all this that work on the natural  
22 areas, and if so, why is he asking now to do it again? It's  
23 already taken 10 years. And is he intending to use this  
24 information in his request for habitat restoration.

25 MS. WAYNE: Well, I can't speak to the motivations

1 of the supervisor, but I can tell you that we -- he is aware  
2 of this plan. He has been for a long, long time, and we're  
3 trying to keep him apprised of our moving forward with this  
4 environmental review and its relationship to the cost  
5 benefit analysis of these three scenarios.

6 MS. JONES: Yes?

7 FROM THE FLOOR: Just again to clarify, so in your  
8 estimation, the planning department, when you complete the  
9 EIR in October of '09, does that in essence satisfy  
10 Objective 1, how to keep Sharp Park golf course with all of  
11 the recommendations that you make in order to keep our  
12 species? Does that satisfy that first part of this?

13 MS. JONES: Well, first of all, October of '09  
14 would be the publication of draft EIR, and then there's a  
15 comment period, so that's for clarification. That's just  
16 the details.

17 FROM THE FLOOR: All right.

18 MS. JONES: My understanding is that the policy  
19 analysis that's going to be done of the 18-hole, 9-hole, no  
20 golf course options is looking at issues that go beyond the  
21 scope of our CEQA analysis, and they are looking into some  
22 of these socioeconomic issues that may even be covering  
23 that. Somebody asked about a few minutes ago. So to that  
24 degree, I think that this EIR is not fully going to answer  
25 those questions that need to be explored in the context of

1           that --

2                         FROM THE FLOOR:   Just the one.   Just the first one  
3           now.   Not -- because we're not talking about your study of  
4           the EIR destroying anything.   We're not really talking  
5           about -- we're talking about protecting what we have  
6           basically, and enhancing it as such, but by keeping it an  
7           18-hole golf course.   The other two, which will come later  
8           on, that's a different issue.   We'll talk about a later.

9                         But right now we're just talking about doing the  
10           things that you studied and keeping the 18-hole golf course  
11           would satisfy the first objective.   What else is going to be  
12           studied?

13                        MS. JONES:   Well, I really -- you know, our  
14           purpose here is not to satisfy any of the objectives having  
15           to do with the golf course analysis, so I don't -- that's  
16           not something that is in our scope of our environmental  
17           analysis on the Natural Areas Program.   So that's -- that's  
18           a separate process, and, obviously, the information that's  
19           gained in this will help inform that, but we are not making  
20           any effort to satisfy any of the objectives of that effort.

21                        FROM THE FLOOR:   So it's not an integrated effort  
22           at all?

23                        MS. JONES:   This is a separate project.   So we  
24           have to look at the overall setting, and we have to look at  
25           cumulative factors, but this is its own project.

1 MR. LAFORTE: As just -- just add a little bit to  
2 that. You know, there will be some -- some what comes out  
3 of this will be some improvements to the wetlands that will  
4 ultimately benefit the species in keeping -- under the  
5 scenario of 18-hole golf course. That is part of this  
6 effort, yes.

7 FROM THE FLOOR: Is that more to keep that than to  
8 try to get rid of it?

9 MS. JONES: There's no intent either way under  
10 this EIR about the golf course. It's assuming that golf  
11 course exists. Yes?

12 FROM THE FLOOR: Does the CEQA have intention to  
13 turn around and make a 9-hole golf course?

14 MS. JONES: I'm sorry. I need everybody to keep  
15 quiet so I can hear.

16 FROM THE FLOOR: Does the city of San Francisco  
17 have an intention to turn around and build 9-hole golf  
18 course down the line?

19 FROM THE FLOOR: Can you repeat the question,  
20 please?

21 MR. LAFORTE: Your question was, so if something  
22 changes down the line, how would that affect the golf  
23 course?

24 FROM THE FLOOR: To make it 9-hole instead of 18.

25 MR. LAFORTE: Yeah, okay. So I should make clear

1           that, you know, things change, anything can happen. I mean,  
2           projects can change, and if that's the case, then we would  
3           take the necessary steps to address a change in the project,  
4           and we would -- we would look at -- you know, we would need  
5           to look at how that affects the environmental review  
6           process.

7                         And Sarah, maybe you could address in the event  
8           that the project would change, how would you address that.

9                         MS. JONES: Well, it sounds like your question's  
10          whether the city intends to change it to a 9-hole golf  
11          course, and that's -- you know, I don't believe there is an  
12          intent one way or another with regard to the golf course.  
13          That's why there's a policy study that's being conducted by  
14          the park department.

15                        If a project does change during the course of the  
16          environmental review, which is sort of a separate issue --  
17          if a project were to change, we would -- you know, we need  
18          to address the impact of the changed projects. You know,  
19          we're not going to rely on an out-of-date project  
20          description essentially, although we would basically need to  
21          talk about whether the changes were covered under the scope  
22          of our review. But, again, the number of holes on the golf  
23          course is not something that is being driven by this EIR in  
24          any way.

25                        FROM THE FLOOR: Because, you know, if they want

1 to make a 9-hole golf course, it's going to cost them a lot  
2 of money. Instead the problem they got to date, it's minor.  
3 They cannot address Sharp Park golf course. Very simple,  
4 the problem they got today is something only that maybe  
5 somebody over there tell them what to do, how to do it, and  
6 let them do it, and won't be no more problem. The water  
7 they got that come on the golf course, it can be cured. It  
8 can be adjusted, and they will have no more problem like  
9 they have years and years and years ago. Why all the ones  
10 in the last few years that we have these problem.

11 MS. JONES: Okay.

12 FROM THE FLOOR: We never had those problems  
13 before.

14 MS. JONES: Okay. It sounds --

15 FROM THE FLOOR: Why now?

16 MS. JONES: It sounds like maybe it's time to move  
17 on to the scoping comments on the scope of this EIR because  
18 people seem to want to talk about that. So let's start, and  
19 if anybody has any more questions about CEQA, Jessica and I  
20 will be around afterwards.

21 Let's just go over how we want to run this part of  
22 it. Please be respectful. People might say something you  
23 don't agree with, but that's -- you know, that's why  
24 everybody gets a chance to speak. State your name so that  
25 the court reporter can accurately get it, and also we can

1 keep up with you in the future and get you information as we  
2 go along.

3 Speak clearly. Stick with our time limit. We  
4 have a three-minute time limit and we have a very visible  
5 clock up there for you to see. And most of all, focus your  
6 comments on what you think should be in the scope of this  
7 EIR, on the Natural Resource Area Management Plan, not the  
8 golf course.

9 So that is the -- that's the story. And has  
10 anybody who wants to speak turned in their speaker cards?  
11 Okay. Great. So John will get that going. Thanks a lot.

12 MR. BOCK: Great. Thank you, Sarah. So as we  
13 mentioned, in order to speak tonight we ask you to fill out  
14 a card. I've got just under 20 cards filled out already.  
15 So if you haven't filled one out and you're interested in  
16 speaking, please drop one at the sign-in table.

17 And we are going to keep it to a three-minute  
18 limit. We ran a little bit long in the opening  
19 presentations and questions and answers, so we're trying to  
20 give everyone an opportunity to speak tonight, so we're  
21 going ask you to adhere to that.

22 I do have one gentleman who was unable to stick  
23 around, so he asked me to read his comments into the record.  
24 That's Mr. Laurie Frater.

25 "If anything less than the full 18-hole golf

1 course is retained, the economic and environmental impact on  
2 my family will be great. We'll need to ferry Andrew to HMB  
3 or elsewhere to play his golf. Others will be similarly  
4 impacted. Please don't throw out the baby with the bath  
5 water. Andrew says please don't take away my golf course.  
6 Thank you."

7 So our first public commenter will be  
8 Mary Keitelman, followed by Ron Maykel. Mary Keitelman.

9 MS. KEITELMAN: Thank you. I don't think this is  
10 on. Testing. It's not on. Test. Test. Test.

11 Thank you for having this here in Pacifica. I  
12 just want to make a couple of comments and hope that they  
13 are addressed. My guess is, from what I've heard, you're  
14 already addressing them, regarding the Sharp Park, one of  
15 the 31 areas that you're looking at. I live here in  
16 Pacifica. My name is Mary Keitelman, and I'm interested in  
17 Pacifica aspect of it particularly. Okay.

18 Number one, chloramine in the water affecting  
19 amphibians. If it's there -- and I don't know if it is, and  
20 I would like that that be addressed so that there is no  
21 chloramine affecting them.

22 Number two, and I think you're probably doing this  
23 already as well, however the property gets looked at, the  
24 other properties that are abutting it, such as Mori Point or  
25 anything else that's near it, I hope that you will look at

1 the endangered species that use Sharp Park and how they also  
2 use those contiguous lands and think of it as a whole  
3 picture. My guess is you probably do.

4 And let's see, third thing is I hope that the  
5 beach will be looked at for the western snowy plover  
6 threatened under the Endangered Species Act, black oyster  
7 catcher, which I think is just not even of concern. It's  
8 just a very -- it's on the edge maybe being threatened. And  
9 other birds that use that beach for roosting, as well as,  
10 you know, well, breeding.

11 And then let's see. The last item, on  
12 East Sharp Park there's a large population of newts in the  
13 pond that drains under the freeway, and it's of concern to  
14 me and to a lot of other people that those newts are free of  
15 chloramine and able to survive and thrive. There are a lot  
16 of other animals there as well, but I think those newts are  
17 very vulnerable.

18 Thank you. That's it.

19 MR. BOCK: Thank you.

20 And I apologize if I misstate anyone's name, but  
21 Ron Maykel is next, followed by Reiner Binsfeld.

22 MR. MAYKEL: Yeah. Hi. My name is Ron Maykel.  
23 I've lived in Pacifica for many, many years, almost  
24 30 years, as a matter of fact. First I want to thank  
25 San Francisco Natural Areas for making the city program

1 (unintelligible). You guys have a good program going in the  
2 city. As a matter of fact, I'd like to see the city council  
3 members spend some time in your program. Could use a little  
4 bit of education in that area.

5 I just want to point out -- first, I want to  
6 answer some questions about the lagoon, you know, and the  
7 flooding. You have two things that took place there. You  
8 had where the berm blew out, pushed tons and tons of sand  
9 that came in there, and there's like a two- to three-foot  
10 wide area where the lake is extremely shallow where the sand  
11 came in. This took place back in 1983, I think. So that is  
12 a factor that has caused -- contributes to the flooding.

13 And also the tules and the cattails, these are  
14 deciduous plants. You know, they die off and then all of  
15 the thatch from these plants creates -- basically assists in  
16 the build-up, which creates -- makes the lake become  
17 shallower and shallower over years and years. The debris  
18 just builds up. And that's a big part of the siltation  
19 there. And I think that's one of the bigger -- bigger  
20 reasons why that's happening.

21 The other -- you know, I really want to see this  
22 lagoon area protected. I would like to see -- there's a  
23 couple of golf holes roaming around. I would like to see  
24 those removed. I think that we really need to focus on  
25 pulling golf away from that lagoon. And also I'd like to

1 see some emphasis on the creek. It's a beautiful creek.  
2 It's been channelized over the years, and it has been  
3 negatively impacted when they developed the golf course.  
4 There's a lot of trees that create kind of dead zone:  
5 eucalyptus, pine, and cypress. I would like to see you guys  
6 look at possibly some fixing up the creek, too, that  
7 Sanchez Creek.

8 At any rate, that's all I have to say. Thank you  
9 very much for your time.

10 MR. BOCK: Thank you for your comments.

11 Reiner Binsfeld followed by Steve Rush.

12 MR. BINSFELD: I just like to say I appreciate you  
13 guys coming today. And you know, I think we're all for the  
14 environment. We all are. And I see no reason why we just  
15 can't co-exist down at Sharp Park. There's no reason to get  
16 in there, and the lagoon's huge. You know, you can clean it  
17 out, and snakes and frogs can do what they do. Just making  
18 it environmentally, you know, protected area. Nobody goes  
19 in there. Golfers don't go there. Environmentalists,  
20 scientists, everybody stay out.

21 There's no reason why we can't co-exist. As he  
22 said, we had a big storm in '83, and those frogs and snakes  
23 took a hit, and they still be able to come back to the  
24 numbers that they have today on their own.

25 I'd also to like to address -- you're saying

1 trails. The park is absent in trails. We have a ton of  
2 trails here in Pacifica. I use them all. They're  
3 fantastic. I go up old Higgins Road here yesterday, which  
4 is our old Highway 1. It's a fantastic walk. I was up for  
5 almost two-and-a-half hours, and I barely scratched that  
6 whole area.

7 We also have Sweeney Ridge, which is just vast.  
8 It's huge. Of course, Mori's Point, which is fantastic.  
9 Rockaway Beach. And also let you know that when the tunnel  
10 comes in, that whole area is going to open up into trails.

11 So come 2012, my God, we're just going to get  
12 miles and miles of new trails. So as far as Sharp Park  
13 goes, I think it just needs to be dredged, cleaned out, let  
14 those frogs and snakes do their thing, allow the golfers to  
15 go around it as it has for last 70 years, and I think  
16 there's no reason why we just can't co-exist and, you know,  
17 make this thing work.

18 MR. BOCK: Great. Thank you for your comments.

19 Steve Rush followed by Rob Bakewell.

20 MR. RUSH: Hello. Thank you. My last name is  
21 Rush. I come from a history of Americans. Two of my family  
22 members are Declaration of Independence signers, and I'm a  
23 history buff. And one of the things about Sharp Park is  
24 that Alister MacKenzie designed the course. That has a lot  
25 of history involved with it. Goes back to a lot of the

1 famous golf courses that are currently being used, and I  
2 think that should be taken into consideration.

3 Secondly, I have -- my profession is an inspector,  
4 and a lot of what I teach people when I go around inspecting  
5 their homes is drainage. Drainage, how to maintain their  
6 property, and sometimes the easiest thing -- the most  
7 simplest things are the most correct ways to correct a  
8 problem, which too much time and effort into something, it  
9 can actually cause much more problems.

10 So I think that the easiest solutions can also be  
11 the cheapest: dredge and direct water if you're trying to  
12 save a species. Keep the golf course intact, keep the  
13 history intact. And do minimal amount of impact to the  
14 environment and do the things that it takes minimally, and  
15 it won't cost the taxpayer a lot of money doing it.

16 MR. BOCK: Next is Rob Bakewell, followed by  
17 Elizabeth Claycomb.

18 MR. BAKEWELL: Hi, everybody. Nice to see you,  
19 Lisa. A whole lot of stepping here in front of me.

20 I'm currently the volunteer steward, the volunteer  
21 steward for the Oak Woodlands in Golden Gate Park, and I'm  
22 involved in Natural Areas Program for several years. And I  
23 submitted written comments, but I'd just like to say one  
24 thing, which is natural areas, there's a big volunteer  
25 component. So in my experience with what goes on in the Oak

1 Woodlands in Golden Gate Park, there's a big feedback that  
2 takes place between the community, school kids,  
3 environmentalists, stakeholders of all kinds, and the  
4 natural areas staff. So it's not only an adversarial  
5 situation. There isn't -- there isn't some big hand coming  
6 down and telling us what to do, when to do it, and how to do  
7 it. There's a lot of feedback. There's a lot of community  
8 participation. So I just want to make that clear.

9 The Oak Woodlands is somewhat of a different  
10 situation than Sharp Park, but you know, we've had -- we  
11 have tree issues. We have trail issues. We have dog issues  
12 and so on, and so far we've been able to work those out and  
13 added a lot of value to Golden Gate Park and really improve  
14 the public safety. That's been a big issue in Oak  
15 Woodlands, and public safety is improved dramatically.

16 I spoke to the Richmond District police captain  
17 today, and he thanked us for our efforts. So if any one of  
18 you want to talk to me about what it's like to participate  
19 in the natural areas, you can talk to me after the meeting.

20 Thank you.

21 MR. BOCK: Thank you.

22 Elizabeth Claycomb followed by Daniel Lim.

23 MS. CLAYCOMB: Good evening, Lisa, Jessica, Sarah,  
24 Daniel, John, Mayor Lancelle, Council Member Nyhart,  
25 Brayland, Planning Commissioner Clifford and members of the

1 public. Thank you very much for the opportunity to speak  
2 tonight.

3 The City of Pacifica is pleased that the initial  
4 study acknowledges that the City of Pacifica has land use  
5 policies and regulations that may be germane to the proposed  
6 Natural Areas Management Plan. We respectfully request that  
7 the Environmental Impact Report include an analysis of the  
8 project's consistency with the Pacifica local coastal band  
9 rules and policies, and any pertinent Pacifica land use  
10 regulations. We also believe that a local coastal  
11 development permit may be required and ask that the EIR  
12 include an analysis of that requirement.

13 In addition, it might be of interest to note that  
14 Pacifica is in the process of updating its general plan and  
15 local coastal plan, which could alter or modify existing  
16 land use policies or result in new policies that could  
17 impact the areas covered in the proposed Natural Areas  
18 Management Plan.

19 Thank you very much.

20 MR. BOCK: Thank you, Elizabeth.

21 Daniel Lim followed by Dave Diller.

22 MR. LIM: Thank you for hearing us. My name is  
23 Daniel Lim.

24 Sharp Park golf course was built in the early  
25 1920's, designed by Alister MacKenzie, as you may know. The

1 areas in dispute are the brackish marsh that floods every  
2 January through April. As a matter of fact, the area is  
3 still closed today, but the area is open when the frogs  
4 hatch and the water recedes. When the sea wall was put in  
5 it created a (unintelligible) the marsh. Prior to that was  
6 a saltwater lagoon, very similar to some of the beaches  
7 along the California coast like San Gregorio Beach, which is  
8 one example of salt water kind of lake. It's a good place  
9 right now for the frogs and snakes from Mori Point to move  
10 up.

11 The golfers have co-existed for over 70 years with  
12 the frogs and the snakes. Why do you insist on fixing  
13 something that isn't really broken? I'm sure it can be  
14 improved, most definitely. Every year the rains flood the  
15 course and many of the holes are flooded, and those holes  
16 are closed, and the pots that are usually there removed --  
17 aren't used until frogs hatchery -- has hatched their eggs  
18 and moved on.

19 People say the golfers are predators of the frogs  
20 and snakes, but really it's more like the raccoons, 'possums  
21 and red tailed hawks. I beg you, please let the Sharp Park  
22 continue so we can co-exist with nature.

23 Thank you.

24 MR. BOCK: Thank you.

25 Next we'll have Dave Diller, followed by

1 David Marshall.

2 FROM THE FLOOR: Can you hold the mic really  
3 close.

4 MR. DILLER: That's all right. I'll speak loud  
5 enough. you'll be able to hear me.

6 Good evening. Thank you for allowing me to speak  
7 to you. One thing that I wished would stop, and that is the  
8 use of the word restore and substitute the word preserve.  
9 We want to preserve what we have. Every time I hear the  
10 word restore, it says to me taking something that we have,  
11 getting rid of it, and restoring. We already have something  
12 good. Let's just preserve what we have.

13 The one question that I still have not gotten  
14 answered, and I think there still is a lot of confusion, we  
15 have one proposal which you are studying -- however you want  
16 to phrase it -- it's going to study how to -- I know you  
17 don't want to talk about the golf course, but with what's  
18 there, how to preserve what's there and then to enhance our  
19 red-legged frog and San Francisco garter snake by dredging,  
20 by doing some of the things that you were talking about.

21 There are two other proposals on the table, and  
22 what's confusing to me -- and I know to a lot of people --  
23 which of these proposals will take precedence? If you come  
24 up with a good way here, which I know you're going to, how  
25 to do the things that you're doing, can one of those other

1 proposals override what you're already going to come up  
2 with? That's what we're concerned about because you are  
3 doing a very careful study. It's been studied since 2007.  
4 We're almost to the conclusion of it, as I understand it.  
5 You're going to come up with some great ideas, great ways to  
6 preserve what we have, and then we're going to come up with  
7 two other possible studies, such as nine holes or close the  
8 golf course. Could one of those take priority over what  
9 you've already done? And that's what I would like addressed  
10 and answered because that's, I think, why most of the people  
11 are here.

12 We want to work in cooperation with you to do the  
13 things that you're doing now. But the other alternatives --  
14 you already have a good plan, you don't need to come up with  
15 another one. That's what we're getting at.

16 Already over \$400,000, as I understand it, has  
17 been spent. I know you don't want to talk about how much  
18 these continued studies with Tetra Tech are going to cost,  
19 but I suspect it's going to be another 400-, 500-, 600- or  
20 whatever it's going come up to. So I just hope that at some  
21 point when you finish this study, those can be addressed  
22 because we want to know where we go from here.

23 Thank you.

24 MR. BOCK: Thanks for your comments.

25 David Marshall followed by George Ambrosio.

1 MR. MARSHALL: Hi. My name is David Marshall.

2 Couple of things. First of all, I heard some  
3 people earlier talking about how rains came in 1983 and  
4 filled in the pond. It's not true. Indeed, waves did come  
5 up, but the problem was that when that happened, the  
6 Corps of Engineers built the wall. When they built the  
7 wall, they blocked a natural stream that was on the north  
8 end of the park.

9 I have pictures of it from 1941, and the flow is  
10 natural all the way down. The Corps of Engineers then  
11 changed it so that the drainage went into the Laguna Salada.  
12 They then attached all the drainage to the freeway and  
13 everything else to that drain. So the Corps of Engineers  
14 actually put all that silt in there.

15 What happens is that that gets full, and it's  
16 starts backing up and flooding the streets of Pacifica.  
17 Now, it's full in backing up because San Francisco hasn't  
18 done anything about it. They haven't either replaced the  
19 stream or exited the north end or anything else, which means  
20 the city of Pacifica then has to spend money pumping out the  
21 water, which doesn't make any sense to me. I don't know why  
22 Pacifica doesn't just send San Francisco a bill.

23 I understand that these studies take a long time,  
24 and I -- you know, I think that lot of the work that you're  
25 doing is very good. But I think that one of the problems

1           that I have with this is you have a study -- that pro study  
2           or 93 pages -- it says the north end is silting up, and  
3           that's what's causing the silt and cattails and things in  
4           the pond. And I think they got that from part of your  
5           800 pages of -- 93 pages you got of 800 pages. So we're  
6           getting around a thousand pages of absolute no action.  
7           Nobody has done anything, and the problem is getting worse  
8           and worse.

9                         Now we get people coming out on the golf course  
10           going, well, the water level's here. I'm making a mark  
11           there. That's where the pond goes to. Pretty soon the  
12           pond's going to be all the way down to City Hall. So I  
13           think that that's one thing.

14                        The second thing is that there's another issue  
15           which is the recycled water. San Francisco PUC is supposed  
16           to kick in some money for recycled water, which will help  
17           keep the pond in a more consistent level, but as part of  
18           this new study, it's my impression that they're trying to  
19           just renege on the whole deal. So I think San Francisco's  
20           got some serious responsibility for taking care of some of  
21           these things and don't have to wait until the end of this  
22           report.

23                        Thank you.

24                        MR. BOCK: Thank you for your comments.

25                        Next we have George Ambrosio followed by

1 Dan Briesach.

2 MR. AMBROSIO: Thank you. By the way, I'm a  
3 32-year Park and Rec employee. I'm a golfer and an  
4 environmentalist. A member of the Loma Prieta chapter of  
5 the Sierra Club and the Greenpeace society. If I thought  
6 the golf course was detrimental to the frogs and snakes, I  
7 would be in the forefront of opposition to the golf course.  
8 But I know differently.

9 Since it was made known that public overflow of  
10 water off the course was detrimental to the frogs and the --  
11 the pesticides we're using, this has been stopped over the  
12 last two or three years. I'm sure the frogs are increasing.  
13 If they're not, it's not because of the golf course. The  
14 golf course is not what's harming the frogs. This is a red  
15 herring argument. Many golf course goes through  
16 environmental sensitive areas. Bodega Bay, Teal Bend in  
17 Sacramento, Modern Bay in San Lorenzo and Stonebrae in  
18 Hayward, which has been -- just got built over a little over  
19 a year ago, which is prime red-legged frog territory. Still  
20 built the golf course.

21 I hear the argument about using this location for  
22 children environmental education, but this lagoon has a  
23 large area to the south of the course that is easily  
24 accessible to the public for this cause. But I see it  
25 hardly ever used by the public. There is plenty of open

1 space area surrounding the golf course and Mori Point,  
2 hiking, nature studies, et cetera. Not like the golf course  
3 is in the middle of urban San Francisco.

4 The planning commission -- I wrote this before I  
5 came here, but I'm glad you're on the same page. The  
6 planning commission should look into thinning the reeds,  
7 choking the lagoon, which would give the water more area and  
8 prevent overflowing in the golf course. This would protect  
9 the flow and keep the course playable during the wet season  
10 and enhance revenue actually for the course.

11 Sharp Park is a -- is an art, is a work of art,  
12 designed by one of the most famous golf course architects in  
13 the world, Alister MacKenzie, one of only four architects in  
14 the Golf Hall of Fame. Would be tragic and criminal to  
15 destroy one of San Francisco's finest athletic recreation  
16 venues unnecessarily.

17 Thanks for the three minutes. We usually only get  
18 two, and I really appreciate being here.

19 MR. BOCK: Thanks for your comments.

20 Dan Briesach followed by Kathleen Manning.

21 MR. BRIESACH: Good evening, everybody. Thank  
22 you, folks for coming down to Pacifica. We appreciate it.  
23 We like to be involved in the situation. I like to thank  
24 you especially. I know how much hard work you've put in the  
25 Natural Areas Plan -- you and probably everybody else, but I

1 know how long you've worked on it.

2 I'm glad that the EIR is coming out now, at least  
3 there's an effort right now because it ties in with  
4 Supervisor Mirkarimi's three-option plan, which I think a  
5 lot of the people here thought we were going to discuss  
6 tonight. But it works -- it ties in anyway with the Natural  
7 Areas Management Plan, and I'm very glad to see, and I want  
8 to repeat that I think the most important part of this --  
9 well, I'd like to say that the environmental people that are  
10 here tonight and the golf people that are here tonight  
11 really need to get together and work to solve our common  
12 problems, which I think is painfully evident now, is the  
13 lagoon is dysfunctional. And that's where the efforts  
14 really need to go. If we can solve the lagoon problems,  
15 that in itself will improve the habitat and will improve the  
16 golf course, and it will solve some of Pacifica's flooding  
17 problems down at that end. So I think that's where the main  
18 focus should be. And certainly it fits in here because that  
19 certainly would improve the natural area and, you know,  
20 improve California natives and all those kinds of things  
21 you're working on.

22 And I'd also like to say that -- one man was  
23 saying that the drainage coming in down off the road -- ever  
24 since they put in Sharp Park Road, I guess about 1985, the  
25 drainage has just been ripping through that golf course and

1           they're just dumping it in there. I think it is a great  
2           idea to look at how to divert some of that water coming off  
3           Sharp Park Road. It's just a big spillway right now, and  
4           Highway 1 and all that -- and I think that could be done  
5           without damaging the creek.

6                         We don't want to just turn the whole thing into an  
7           underground pipeline. So the creek is very viable. It's  
8           working fine for that watershed that's there, but the  
9           drainage coming off the road is really something, and it's  
10          causing silt problems and of course flooding.

11                        So I hope that also if you look at -- there's an  
12          overflow pipe at Horse Stable Pond that used to function,  
13          and now it's silted in, and with the tules and -- the whole  
14          thing is dysfunctional. But there is an overflow pipe  
15          there. It used to work so that we didn't have to pump. It  
16          used to just flow.

17                        Anyway, thanks a lot for coming down. People in  
18          Pacifica appreciate being involved. Thank you.

19                        MR. BOCK: Thanks for your comments.

20                        Kathleen Manning followed by Cliff Smethers.

21                        MS. MANNING: Hi, thank you. I'm from the --  
22          Kathleen Manning from the Pacifica Historical Society. And  
23          we have a long history in Pacifica of caring for the  
24          environment and for protecting and really cherishing the  
25          environment. The history the last -- since the city was

1           founded in '59, we've done tons of things to keep the hills  
2           green and to do wonderful things.

3                         Now, the historical society is very proud of the  
4           wonderful golf course we have here. Looking at the  
5           historical and cultural part of the environment, it is a  
6           famous golf course, and we've heard from people all over the  
7           world that have said, "Please keep that golf course. Keep  
8           the Alister MacKenzie golf course." And we've heard from  
9           different societies, and it's been very, very interesting to  
10          see the number of people that care about that.

11                        And also I wanted to mention that the clubhouse  
12          was done by the Willis Polk firm. So those are some of our  
13          reasons that we care about that part of the environment.

14                        Thank you.

15                        MR. BOCK: Great. Our next speaker will be  
16          Mitch Monroe followed by Chuck Egiziano. So we'll have  
17          Chuck Egiziano.

18                        MR. EGIZIANO: Hi. My name is Chuck Egiziano, and  
19          I'm a retiree in Pacifica, and I love the golf course. And  
20          if you -- if it disappears, I guess I'd have to leave  
21          Pacifica. I want to thank the people trying to preserve the  
22          frogs and the snakes on behalf -- excuse me -- on behalf of  
23          all the bird life out there because they sure make a feast  
24          out of all the little frogs as soon as they start coming  
25          out. And the hawks and ravens and seagulls really enjoy

1           them full life.

2                       I had a question is -- and you said that this is  
3 really not the Parks and Recs end of the spectrum, that is  
4 Parks and Recs motivated by dollars in this whole scenario  
5 in considering changing the golf course, the size of it or  
6 limiting it, and the -- I guess eventually we'll get around  
7 to that.

8                       And the second question I had is, is there any  
9 consideration if the Parks and Rec is not interested in  
10 maintaining an 18-hole course in Pacifica, would they  
11 consider selling it or doing a long-term lease to the city  
12 of Pacifica so we could have some economics in the town of  
13 Pacifica? We don't have a lot of money being generated in  
14 this little town, so that's basically all I wanted to ask.

15                      MR. BOCK: Thank you.

16                      Our next speaker is Jack Rauch followed by  
17 Suzanne Valente. Suzanne is the last speaker card I have.  
18 So if anyone else is interested in speaking, please turn in  
19 your cards now.

20                      MR. RAUCH: My name is Jack Rauch, and I am a  
21 resident of Pacifica and also a San Francisco archer. I  
22 want to thank you very much for coming here and explaining  
23 this to us today the way this process is going to go. I'm  
24 encouraged by the fact that recreation is a focal point for  
25 discovery.

1 I want to remind everybody that the land at  
2 Sharp Park was donated to the city -- to San Francisco for  
3 recreational purposes by the Murphy family and others, and I  
4 think it should continue that way. I look forward to the  
5 report.

6 I'm also encouraged by the fact that you've  
7 retained an outside firm to do the study. I'm very much  
8 concerned about the pressures put on people by environmental  
9 groups, many of whom don't know what they're talking about.  
10 I find it quite distressing when I read things in the  
11 newspaper that are simply not true. So I welcome Tetra Tech  
12 and the studies that you're -- that you're doing. Again, I  
13 want to reiterate that this is recreational land, and I  
14 think it should continue in that vein.

15 Thank you very much.

16 MR. BOCK: Next up will be Suzanne Valente  
17 followed by Robine Runneals.

18 MS. VALENTE: Good evening. There is a widespread  
19 perception that the Natural Areas Program is spinning out of  
20 control and it has overreached far beyond its goal of  
21 preserving the remnants of natural vegetation still left  
22 standing at SF park lands, and now engaging in a campaign of  
23 restoration ecology in which overwhelmingly human modified  
24 or created landscapes are being removed to allow for the  
25 recreation of -- re-creation of natural ones, or more

1 accurately, a small from thereof. The Natural Areas Program  
2 has its place, and it needs to be kept in that place. It  
3 cannot be allowed to trump the clear preferences of the vast  
4 majority of park land users in San Francisco.

5 That's not my rhetoric. That's the rhetoric of  
6 Arthur M. Shapiro, professor of evolution, ecology, and  
7 entomology from the center of population biology at  
8 U.C. Davis. He -- I think he echos the thoughts of many  
9 people in this audience and outside this room, but we just  
10 don't have the credentials to say it. But what I can say  
11 tonight is that I think that the NAP proposal for Sharp Park  
12 as well the other park locations intends to make major  
13 changes in the ecosystems, sometimes with no apparent  
14 benefit to wildlife and perhaps detriment to important  
15 wildlife.

16 Additionally, the NAP park proposal ignores the  
17 serious public safety issues that should be addressed,  
18 especially at Sharp Park. And EIR, if it intends to conform  
19 to the precautionary principles, which was adopted in 2003  
20 by the City of San Francisco, must cover the public safety  
21 issues for humans at every park in detail, as well as  
22 provide substantial, reliable, scientific evidence to  
23 justify the proposed ecosystem changes.

24 Closure of the park or the entire golf course to  
25 create a natural areas wetlands restoration to benefit the

1 red-legged frog and San Francisco garter snake is the latest  
2 proposal under consideration by SFRPD. This is pointless.  
3 U.S. Fish and Wildlife did not designate Sharp Park as a  
4 critical habitat for the red-legged frog or SF garter snake.  
5 Therefore, by the U.S. Fish and Wildlife's own definition,  
6 whatever happens to either species in this area will have no  
7 impact upon the ultimate survival or failure of the species.  
8 There is no legal imperative for expansion of the habitat to  
9 benefit these two species.

10 Environmental attorneys explained that there is  
11 critical habitat and everything else. So Sharp Park has the  
12 same requirements as a habitat as your home's driveway does.  
13 The NAP report acknowledges that the quality of the habitat  
14 at Laguna Salada, Horse Stable Pond, and the adjacent  
15 wetlands remains excellent. Make the minor alterations  
16 biologists recommend and leave the rest of Sharp Park alone.

17 The plan for Sharp Park is the worst of any of the  
18 SF park system. It is clearly in violation of the mission  
19 statement. Uhm, they do not take into consideration public  
20 safety, which includes West Nile Virus and the need to  
21 control mosquitoes and the recent ruling by the court  
22 indicates that they no longer can spray pesticides to  
23 control adult mosquitoes. They can only drop larvicide.  
24 Clearly we cannot ensure that the public be will be safe if  
25 you expand the wetlands.

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Thank you.

MR. BOCK: Our next speaker is Rabine Runneals,  
followed by Mike Pacelli.

MS. RUNNEALS: My name is Robine Runneals from  
West Shore Park here in Pacifica, and I'd like to thank you  
for coming down and doing this here in town. A lot of  
meetings in San Francisco, a lot of people have been  
attending. So thank you for bringing it here.

And West Sharp Park and that golf course and  
Palmetto Avenue, that is the center of our city. So this is  
very important to all of us. Thank you.

Things that I'd like you to please consider in the  
EIR or CEQA is flooding impact -- flooding impact including  
out into the neighborhood and proposed methods to prevent  
flooding in all three of the scenarios.

Mosquito impact. If there is more fresh water --  
well, if there's more fresh water, they're going to come,  
and how that will be controlled.

How would views from the surrounding residences be  
impacted by the three scenarios, views into the park as well  
as our views to the beach and the ocean.

Impact of the decrease of golfers visiting  
West Sharp Park and the area, and the potential economic  
impact to the city of Pacifica and the impact of a loss of a  
public golf course serving northern San Mateo County's

1 recreation needs as well that of San Francisco's. And the  
2 impact of the loss of a golf course, which is a historical  
3 attraction to city of Pacifica also, and how that would  
4 affect and tie into the city of Pacifica's current efforts  
5 to take the Palmetto Avenue business district and emphasize  
6 upon the historic characteristics of that neighborhood and  
7 develop that into Pacifica's historical district, which is a  
8 current plan is being developed in Pacifica here.

9 And all of the historical references that Pacifica  
10 is attempting to draw upon for the work done in this  
11 neighborhood is all linked to the golf course and everything  
12 that the city had in that neighborhood, which is the  
13 original downtown, prior to the city's incorporation.

14 Thank you.

15 MR. BOCK: Next we'll have Mike Pacelli followed  
16 by Mitch Monroe.

17 MR. PACELLI: Mike Pacelli, Pacifica resident.

18 I'd like to consider the impacts of the storm  
19 drainage system off Sharp Park Road, you know, the golf  
20 course area, the possible partnerships with the City of  
21 Pacifica on the golf course, the economic impacts of both  
22 golf and other recreational uses into the city of Pacifica  
23 and consideration of the berm, the conditions of the berm  
24 that are there right now.

25 MR. BOCK: Next we'll have Mitch Monroe followed

1 by Allan Eisenberg.

2 MR. MONROE: Hello, my name's Mitch Monroe. I'm  
3 here to support off-road cycling in the other areas of  
4 Sharp Park, particularly up to the archery range, also up  
5 there beyond the archery range where it connects up to -- up  
6 beyond the ridge. That used to be a fun trail coming off of  
7 there up through the archery range.

8 One of your -- one of your proposals in your  
9 plan -- I can't remember which part -- that says trails  
10 would be created in previously inaccessible areas. I think  
11 it's important to link that lower area, like, particularly  
12 the archery range and also where the shooting range is, that  
13 you guys clean that up, up to the upper ridges so that you  
14 can access the southern parts of Pacifica.

15 I also think it's important to keep GGNRA out of  
16 Sharp Park because they seem to be taking over all the city  
17 open spaces and kind of going over them with a fine tooth  
18 comb and sanitizing everything and turning everything into,  
19 you know, basically paved fire roads, and it's getting  
20 pretty boring out there.

21 You guys talked about volunteerism, the  
22 stewardship was part of this plan, and a group I represent  
23 is called SF Urban Riders and we've merged with Craig Dawson  
24 Mt. Sutro, and we logged over 500 collected hours -- man  
25 hours of volunteerism. And we plan to do a lot more. So if

1           you guys do end up getting a project up there and want to  
2           open up a multi-use trail that's bicycle lane, I think  
3           you'll have a lot of manpower to help get that done, and you  
4           won't have to pay for labor.

5                         That's all I got. Thanks.

6                         MR. BOCK: Thank you for your comments.

7                         Allan Eisenberg followed by the Steve Sinai.

8                         MR. EISENBERG: Hello. My name's Allan Eisenberg.  
9           I live in San Francisco. I belong to the Sharp Park golf  
10          club by choice, obviously.

11                        In your presentation you talked about the  
12          socioeconomic issues that go to every park and facilities  
13          with -- throughout the general population to use. I'd like  
14          to point out that Sharp Park is -- is a community golf  
15          course. As a community, you can go down there almost any  
16          evening and find fellows who want to talk over there,  
17          constantly enjoying themselves with their friends, which is  
18          something that does not exist at the other two courses that  
19          are run by the City of San Francisco, 18-hole courses, which  
20          would be Harding and Lincoln.

21                        Also Sharp Park offers the opportunity for high  
22          school teams to play golf. They cannot play golf at Harding  
23          because it's cost prohibitive. So from the socioeconomic  
24          standpoint, I think it is important that it be kept as it is  
25          for the general community.

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Thank you.

MR. BOCK: Up next is Steve Sinai followed by Ellen Edelson, which is currently the last speaker card that I have. So if you haven't gotten a chance yet, please fill out a card.

MR. SINAI: Hi, everyone.

Two questions or things I'd like to look at. One's already mentioned, which is take a look at how much the golf course contributes to Pacifica's economy versus how much the (unintelligible) how much that contributes to Pacifica's economy.

Second, if you could do some kind of study on populations of San Francisco garter snake, red-legged frog. I'm hearing from the group that wants to shut down the golf course that Sharp Park is basically the only habitat for the two animals. I just can't believe that, but nobody really seems to know. So take a look at throughout San Mateo County and see what the different habitats are and how the dropping of the population of the frog, what the causes might be. Appreciate that.

Thanks.

MR. BOCK: Next up is Ellen Edelson.

MS. EDELSON: Ellen Edelson from San Francisco, and I'm with the (unintelligible). And I hate speaking in front of a group. Makes me nervous.

1                   But I do favor the idea of restoring Sharp Park  
2                   and restoring the -- I'm too nervous -- but city water  
3                   corridor as well, and how it connects with other green  
4                   spaces in the area. I would like to ask we consider the  
5                   impact of leaving as many trees as you're suggesting  
6                   leaving, see what that impact would be. That we would --  
7                   95 percent is an awful lot of trees in my view.

8                   I would like to encourage consideration of the  
9                   trails and the impact that the trails have on hiking, which  
10                  is increasing in importance by many studies of recreational  
11                  activities, whereas other activities have gone down on the  
12                  list. But consider the use of hiking and environmental  
13                  education that would have on the students -- on the students  
14                  and other people out there to see the bigger picture, to see  
15                  where humans fit into the larger frame of things. I think  
16                  we're very egocentric in our use of the land, and we need to  
17                  use space for (unintelligible).

18                  MR. BOCK: Thank you. That's our last speaker for  
19                  the evening. So unless there's anyone else who is  
20                  interested in speaking, I'll encourage you to take advantage  
21                  of -- in roughly two weeks between now and the end of the  
22                  public comment period that's May 26th, you're welcome to  
23                  turn in any written comments you had tonight, send in a  
24                  letter. We'll keep this period open until the 26th and use  
25                  those comments to help frame the environmental analysis we

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do in the EIR, which public review we anticipate in the fall  
of this year.

Thank you, everyone, for coming out, and have a  
good night.

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CERTIFICATE

I, the undersigned, a Certified Shorthand Reporter for the state of California, hereby certify that the foregoing proceedings were reported by me, a disinterested person, and were thereafter transcribed under my direction into typewriting; that the foregoing is a full, complete, and true record of said proceedings.

Executed this 27th day of May, 2009.



*Laura Axelsen*  
-----  
LAURA AXELSEN, CSR NO. 6173

## **Appendix D**

### **Written Scoping Comments**

Lydia Cassorla, MD,  
1801 14<sup>th</sup> Ave  
San Francisco, CA 94122

May 2, 2009

Bill Wycko  
S.f. Planning Dept  
Natural Areas Management Plan  
1650 Mission St, Suite 400  
SF, CA 94103

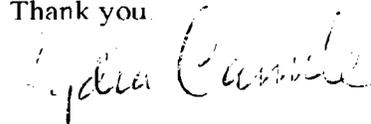
Dear Mr. Wycko:

I am writing concerning the SNRAMP as it relates to the steep sand covered areas of the Rock Outcropping at 14<sup>th</sup> Ave between Ortega and Pacheco Sts. I cannot attend the meeting on on May 12. Therefore I take this opportunity to express concern regarding the very unstable nature of these areas. I have no objection to modifying a different flora in this area, however as a long-term resident of the neighborhood I wish to inform you that any significant denuding of areas in preparation for this will likely have a disastrous effect on sand retention.

Also, the City does a very poor job of clearing sand in the roadway below, and this causes a traffic hazard on a narrow stretch of 14<sup>th</sup> Ave that cannot accommodate crossing traffic as is, despite being a two-way street.

If you wish to change the plants on the steep portions, it should be done very slowly over a number of years, verifying that new plants are in fact being established. Please do not allow areas more than a few feet across to be denuded of existing plants each year

Thank you.



Lydia Cassorla

PLEASE CONFIRM  
RECEIPT:

lydiacassorla.com

SAN FRANCISCO  
**PUBLIC  
GOLF**  
  
**ALLIANCE**

220 MONTGOMERY ST., #303  
SAN FRANCISCO, CA. 94104  
(415) 392-5431, ext. 203  
E-MAIL: RICHARD@ERSKINETULLEY.COM

May 11, 2009

San Francisco Planning Department  
Attn: Bill Wycko, Environmental Review Officer  
1650 Mission St., #400  
San Francisco, CA. 94103-2479

Re: Natural Areas Management Plan EIR  
"Scoping Meetings," May 12 and 14, 2009  
Case No. 2005.1912E  
Sharp Park Golf Course

Dear Mr. Wycko,

On behalf of the San Francisco Public Golf Alliance (the "Golf Alliance"), and in response to the Planning Department's Notice of Preparation of an Environmental Impact Report, dated April 22, 2009, I submit the following comments and questions relating to Sharp Park, and in particular to the Sharp Park Golf Course.

Some, but not all of my questions will relate to an Ordinance, adopted by the San Francisco Board of Supervisors on May 5, 2009 (the "Ordinance"), amending Article 3 of the San Francisco Park Code by adding Section 3.20, to read as follows:

Sec. 3.20 SHARP PARK. (a) No later than July 31, 2009, the Recreation and Park Department shall develop a plan, schedule and budget for restoring the habitat for the California red-legged frog (*Rana draytonii*) and the San Francisco garter snake (*Thamnophis sirtalis tetrataenia*) in conformance with the Endangered Species Act, 16 U.S.C. 1531, et seq., and all other regulatory requirements; and

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Attn: Bill Wycko, Environmental Review Officer  
May 11, 2009  
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for transferring Sharp Park to, or developing a joint management agreement with the Golden Gate National Recreation Area, and the City of Pacifica and/or the County of San Mateo, in accordance with the deed granting Sharp Park to the City and County of San Francisco and San Francisco Administrative Code Section 23.41. The Department shall base such restoration plans on the best scientific information available, and shall include alternatives that (1) retain or redesign the golf course and (2) eliminate the golf course.  
(b) No later than August 31, 2009, the Department shall provide to the Clerk of the Board of Supervisors a report detailing the steps taken, and the progress made, to achieve the goals set forth in subsection (a), above."

#### **QUESTIONS**

##### **1. Question Relating to the Ordinance and Possible Alternative Use Plans For the Sharp Park Golf Course.**

1.1. To the extent that the Ordinance, adopted by the San Francisco Board of Supervisors on May 5, 2009, would result in a "plan" to "eliminate the golf course" at Sharp Park, will the Tetra-Tech Environmental Impact Report that was publicly noticed by the Planning Department's April 22, 2009 Notice of Preparation afford the environmental impact review required by CEQA?

1.2. Will any "plan" to "eliminate the golf course" that the Recreation and Park Department comes up with be subject to an EIR under CEQA? If so, when will such environmental review occur?

1.3. To the extent that the Ordinance, adopted by the San Francisco Board of Supervisors on May 5, 2009, would result in a "plan" to "redesign... the golf course" at Sharp Park, will the Tetra-Tech Environmental Impact Report that was publicly noticed by the Planning Department's April 22, 2009

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Attn: Bill Wycko, Environmental Review Officer  
May 11, 2009  
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Notice of Preparation afford the environmental impact review required by CEQA?

1.4. Will any "plan" to "redesign... the golf course" that the Recreation and Park Department comes up with be subject to an EIR under CEQA? If so, when will this occur?

1.5. Which governmental entity or entities have permit-granting authority for any change of use at the Sharp Park Golf Course: City of San Francisco, City of Pacifica, County of San Mateo, California Coastal Zone Commission, Army Corps of Engineers, California Fish and Game, U.S. Department of the Interior, and/or other entities? For each governmental entity with permit-granting authority over the property, please state which permits are within which entity's authority.

**2. Questions Relating to golf course irrigation and its effects on the ponds and associated wetlands.**

2.1. To what extent are Laguna Salada and Horse Stable Pond, and their associated wetlands, created and/or recharged and/or enhanced by irrigation at the Sharp Park Golf Course?

2.2. Over the past five (5) years, what have been the amounts of irrigation water (measured in gallons) used each month by the Golf Course?

2.3. How much of the Golf Course irrigation water, measured in gallons, and measured month-by-month over the past five (5) years, enters the ponds and their associated wetlands?

2.4. What would be the effect on the habitat of the California Red-legged Frog at Laguna Salada, and/or Horse Stable Pond, and/or their associated wetlands, of complete cessation of irrigation at the Golf Course? Does the effect differ as between low-rainfall months and high-rainfall months, and

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Attn: Bill Wycko, Environmental Review Officer  
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if so, what are the effects in the different months?

2.5. What would be the effect on the habitat of the California Red-legged Frog at Laguna Salada, and/or Horse Stable Pond, and/or their associated wetlands, of reduction of irrigation at the Golf Course? Would the effect differ as between low-rainfall months and high-rainfall months, and if so, what would be the effects in the different months?

2.6. What would be the effect on the habitat of the San Francisco Garter Snake at Laguna Salada, and/or Horse Stable Pond, and/or their associated wetlands, of complete cessation of irrigation at the Golf Course? Would the effect differ as between low-rainfall months and high-rainfall months, and if so, what would be the effects in the different months?

2.7. What would be the effect on the habitat of the San Francisco Garter Snake at Laguna Salada, and/or Horse Stable Pond, and/or their associated wetlands, of reduction of irrigation at the Golf Course? Would the effect differ as between low-rainfall months and high-rainfall months, and if so, what would be the effects in the different months?

2.8. What would be the effect of complete cessation of irrigation at the Golf Course on the salinity of the water in Laguna Salada, and/or Horse Stable Pond, and/or their associated wetlands?

2.9. What would be the effect of reduction of irrigation at the Golf Course on the salinity of the water in Laguna Salada, and/or Horse Stable Pond, and/or their associated wetlands? Would the effect differ as between low-rainfall months and high-rainfall months, and if so, what would be the effects in the different months?

**3. Questions relating to the Seawall.**

3.1. Does the groundwater generated by irrigation at the Golf Course have any effect on the hydrostatic pressures affecting the seawall? If so, what is that effect? And if so, what would be the effects on the strength and/or integrity of the seawall of (a) complete cessation of irrigation at the Golf Course, or alternately (b) reduction in the amount of irrigation at the golf course? Would these effects differ as between low-rainfall months and high-rainfall months, and if so, what would be the effects in the different months?

3.2. Is the habitat for the California Red-legged Frog in and around Laguna Salada and/or Horse Stable Pond and/or their related wetlands affected by the continued existence of the seawall? If so, how?

3.3. What is the current structural condition of the seawall? What is its useful life expectancy? At what point will it need to be repaired or replaced in order to protect the current freshwater habitat of the California Red-legged Frog in and around Laguna Salada and/or Horse Stable Pond and/or their related wetlands?

**4. Questions Relating to Potential Flooding, Disease, and Other Effects Of Alternative Uses at the Golf Course.**

4.1. Would the creation of new freshwater ponds in place of existing fairway areas at the Golf Course result in increased flood-endangerment to residents of the neighborhoods north and/or south of the Golf Course, in the event of storm surges that overtop the seawall, as has happened in the past?

4.2. Would replacement of golf fairways at Sharp Park west of Highway 1 by newly-created freshwater ponds and wetlands result in increased breeding areas for mosquitoes? If so, what measures would

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be necessary to protect residential neighbors north and south of the Golf Course from West Nile Virus?

4.3. As of May, 2009, what aerial spraying for mosquito larva and adult mosquito control is permitted by law, and what aerial spraying for mosquito larva and adult mosquito control is actually performed at Sharp Park; describe generally the seasons and times of this spraying. Are other measures besides aerial spraying used for mosquito and mosquito larva control at Sharp Park, and if so, please describe them. What is the effect of such mosquito and mosquito larva control on the red-legged frog population at Laguna Salada and Horse Stable Pond? What is the effect of such mosquito and mosquito larva control on residential neighbors of the Sharp Park Golf Course?

4.4. Would closure of the Golf Course, and regrading of some or all of the fairways and greens to the west of Highway 1 to create new freshwater ponds and wetlands (as has been proposed by some advocates of "habitat restoration"), disturb the current habitat for the California Red-legged Frog and/or San Francisco Garter Snake at Laguna Salada, and/or Horse Shoe Pond, and/or their currently-existing associated wetlands? Would such work require "take permits" from California Fish & Game and/or the U.S. Fish & Wildlife Service? What are the prospects that these entities would grant any such "take permits" that may be required.

4.5. Without the groundwater generated by irrigation at the Golf Course, what would be the source of water for the proposed newly-created freshwater ponds and wetlands at Sharp Park west of Highway 1?

#### **5. Question Relating to Recycled Water Project.**

5.1. It is our understanding that San Francisco has near-term future plans to replace its current freshwater irrigation of the Golf Course with

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recycled water to be purchased by the City from the City of Pacifica's Calera Creek Water Recycling Plant. In the event the Golf Course were to be closed or reduced in size pursuant Recreation and Park Department plans pursuant to the Ordinance, would the City of San Francisco follow-through on its plans to purchase the recycled water? Would San Francisco have anyplace else to use that amount of recycled water in the Pacifica area? Would recycled water from the Calera Creek Water Recycling Plant be used as the water source for expanded freshwater ponds and wetlands to enhance habitat for the Red-legged Frog and San Francisco Garter Snake under an alternate-use plan for Sharp Park developed by the City of San Francisco? If not recycled water, then what would be the water source for expanded freshwater ponds at Sharp Park, in the event the golf course irrigation were to be discontinued or reduced?

**6. Comment and Question Relating to Effects  
On Cultural and Recreational Resources.**

6.1. The Initial Study of Significant Natural Resource Areas Management Plan, at page 71, states the EIR will not discuss impacts on significant architectural resources. It is the position of the San Francisco Public Golf Alliance that Sharp Park Golf Course is a significant historic architectural resource because of its age (opened in 1932), and the fact that it is one of the very few municipal golf courses designed by the preeminent golf architect Alister Mackenzie, whose adopted home was the San Francisco Bay Area. This golf course gives public course golfers the opportunity to experience and appreciate landscape architectural genius at a reasonable price in a beautiful natural setting. The golf course is accessible as well, visually, to neighbors and strollers. Moreover, there are ways to increase the public access to the golf course, by boardwalks and/or viewing platforms, that would further increase public access to the site without interfering with either the golf or the protected

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species habitat. The Mackenzie heritage of this classic golf course is a point that should be addressed in the EIR.

6.2. The Sharp Park Golf Course provides public recreation and healthful outdoor exercise to over 50,000 paying customers annually, youth sports opportunities to high school team golfers, and other public recreational benefits. What would be the effect of loss of this recreational facility on its current users? How far would current users have to drive to find comparably-priced, comparable-quality golf recreational opportunities? For what percentage of current Sharp Park Golf Course users would closure of the golf course mean the end of their ability to play golf?

Thank you for your attention to these matters.

Very truly yours,



Richard Harris  
San Francisco Public Golf Alliance

cc: City of Pacifica Mayor Julie Lancell  
California Department of Fish and Game  
U.S. Fish and Wildlife Service  
Sierra Club, Loma Prieta Chapter  
Committee for Green Foothills  
Dawn Kamalanathan, Rec & Park Department  
Sharp Park Golf Club, Dave Diller, President  
San Francisco Golf Task Force  
Supervisor Sean Elsbernd  
Supervisor Ross Mirkarimi

**CALIFORNIA NATIVE PLANT SOCIETY**  
**Yerba Buena Chapter**  
338 Ortega Street, San Francisco, California 94122

To San Francisco Planning Department: Planning Case No. 2005.1912E

I spoke at the Scoping Meeting at the San Francisco County Fair Building on May 12, but I don't speak well at public meetings and wasn't able to articulate my thoughts. I ask that these written comments supersede my verbal remarks.

The City's Natural Areas Program (NAP) is responsible for 31 natural areas, but many of those areas have been severely compromised by conflicting uses. The City has made political compromises in some areas, such as Bernal Heights, and do not enforce laws in any of the 31 areas. Nevertheless, the EIR should weigh the values of restoring the areas for maximum biodiversity enhancement, and the effects of this enhancement on citizens of the city, who have little chance to be exposed to our biological riches. This review should look at the whole issue of off-leash in our natural lands. Currently 90% of dog-play-areas are on natural lands, a shocking state of affairs. Regardless of the City's ability to enforce laws, all our natural areas—ie, the remnants of the original landscape--should be evaluated for their natural assets.

For prioritization purposes the NAP divided its lands into management areas: MA-1, -2, -3. All three categories have the potential to be restored to diverse richness. One Commissioner has proposed divorcing MA-3 areas from the NAP and charge another entity with their management. This makes no sense at all. These lands are interwoven with MA-1 and MA-2 areas in a jigsaw-puzzle pattern and separating MA-3s would create administrative confusion. There is nothing to argue in favor of doing this and everything to be said against it. Fragmenting the natural lands only adds to the burdens of this already overburdened, insufficiently funded, program.

Tree plantations, such as on Mt Davidson, Glen Canyon, Lake Merced, Pine Lake, Sharp Park, Dorothy Erskine Park, and Bayview Hill have proliferated well beyond their original plantings and have had severe negative impacts on the City's biodiversity and biological health. Plan proposals for thinning are politically-motivated and absurdly low and should be reconsidered. The term "weed" as used by those engaged in ecological restoration, does not distinguish between plant life form: It can apply to a tiny annual plant as well as to trees and anything in between. Certain trees—in this case primarily the Tasmanian blue gum, *Eucalyptus globulus*—have aggressively spread beyond the original plantings and have had devastating impacts on our natural heritage. Those impacts should be analyzed, and the analysis should include the possibility of removing all of the weed trees.

There are a surfeit of trails, some of which should be closed. New trails should not be built where native plants exist, for the reason that soil disturbance is very

damaging. When soil is disturbed weeds move in to pre-empt the space, and it becomes forever after a weed patch.

Sharp Park golf course should be analyzed to ensure that the plans are scientifically-based and that they ultimately select the alternative that will ensure that the San Francisco garter snake and California red-legged frog recover. The golf alternatives should include analysis of the environmental impacts of no golf, golf, and a modified golf course.

Jake Sigg, Chair  
Conservation Committee  
415-731-3028

N.B. Your Public Notice states that “The SNRAMP ***proscribes*** both general management activities that apply to all Natural Areas and management activities specific to each Natural Area.”

I have interpreted this as a typo for *prescribes*, and my remarks are based on that.

San Francisco Planning Department  
EIR Public Scoping Meeting Written Comment Form  
Natural Areas Management Plan  
Case # 2005.1912E

If you wish to submit written comments on the above project, you may do so on this sheet (although use of this form is not required). Please submit written comments at today's public scoping meeting, or by mail to Bill Wycko, San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA 94103. All comments must be submitted no later than 5 P.M., May 26, 2009.

Write your comments regarding the environmental review for the project here. Use the back of the sheet or additional pages if necessary.

What are ENV. IMPACTS OF:  
- Leaving 95% of INVASIVE trees in Natural areas?  
~~What~~ - 90% of OFF-LEASH dog areas in Natural areas?  
- Cutting new trails through Sensitive Natural areas?

Management Plan has already been heavily COMPROMISED

What are ENV. IMPACTS OF a NO Management Plan alternative?

Name: Greg Gaar

Organization (if any): Nature in the City

Address: 440 Hazelwood SF 94127

E-mail Address: dunetansy@yahoo.com

My comments will focus with reference to my experience in Oak Woodlands - GG Park Natural Area.

I suggest that EIR of NAP management Plan take seriously the boots on the ground experience of local habitat restoration volunteers.

The removal of trees and dog issue seem to be big deals in the agenda.

My view is that Oak Woodlands are about 3 % of GG P and represent a fraction of what remains of original coast scrub/Oak Woodland habitat that predates the Park.

Our experience with tree canopy ( blue gum eucs' and monterey pine/cypress and ) and varieties of invasive tree species indicates that Natural Areas mandate to protect these remnant habitats trumps the often misguided attempts to " protect " trees.

In fact , in the Oak Woodlands, as far as I know , very few if any of the large canopy trees have been cut ( altho they are very problematic in some place and should be thinned ) , BUT a lot of the invasive ' monocultural ' shrubs and trees have been cut to enable healthy growth of original natural habitat and in fact we plant native shrubs and trees to restore aesthetic and habitat balance.

We also have cut the invasive monoculture to reduce the danger of fire ( we have had fires in the OW caused by vagrant campers ) and also to clear overgrown areas that provide cover for illegal camping and trash accumulation. The overlapping GG P jurisdiction ( RPD - GG P management is not always on board due bureaucratic squabbling ) has had a mixed record in coping with this issue.

This indicates to me that Natural Areas must have the clear authority to regulate the core of the natural area AND adjacent ' supporting ' zones, i.e. MA-1 , MA-2 , MA-3. Therefore, I think that this ' tri - level ' natural area designation could be a recipe for undermining the mandate of Natural Areas to regulate, restore and steward these places based on science, factual evidence and, really, common sense.

In regard to dogs - as of now everyone is free to use such restored places as Oak Woodlands Coon Hollow - but if it becomes obvious that dogs digging, pooping and peeing in this place force out everybody else then Natural Areas and the majority community must have the right to require limits to dog play.

It doesn't rain for 5 months and eventually ( even if dog doo is picked up ) the place begins to smell like a dog toilet.

Overall, the Natural Areas mandate to restore and steward the tiny remnants of our ' original' natural habitats in this regional urban environment require some sacrifice on the part of narrow interests that don't put natural habitat front and center.

I think it is quite obvious that we continue to lose planetary biodiversity and our hands are not clean on this score - we must do better.

ROB BAKEWELL

Volunteer Steward for SFRPD Natural Areas Program

Oak Woodlands - GG Park

415-710-9617



May 14 . 2009

Concerns for Sharp Park Golf Course.

May 14, 2009

To whom it may concern,

I'd like to address what I feel should be the alternatives for your scoping efforts.

I think the no project alternative should be followed by two or three alternatives with various degrees of mitigation, ESHA restoration and educational panels along existing trails retaining all 18 holes of the Sharp Park golf course in some form or fashion.

There are currently plenty of access trails that can support educational displays leading up to and including Mori Point that make moot the need to reclaim large area's of the golf course to facilitate this worthy need.

The alternatives should have and include restoration/repair elements to safe guard against egg sacks being laid in temporary wetlands that are known to dry before tadpoles can develop into adults. The seasonal ponds should be mitigated to alleviate this unfortunate natural behavior if deemed necessary.

I think the golf course can be mitigated, retaining all 18 holes in some form and that restoration(s), as yet to be identified and agreed to by agencies such as the US Fish and Wildlife Service and the California Coastal Commission will insure the existing ESHA(s) will be best able to support listed species.

In closing I see no need to have an alternative with less than 18 holes, that has trustee agency approved mitigations and some sort of educational element such as properly placed panels along existing trails. Thank you for your attention to this matter.

Yours,

A handwritten signature in black ink that reads "TODD M. BRAY". The signature is written in a cursive, slightly slanted style with a long horizontal stroke at the end.

Todd M. Bray  
468 Donaldson  
Pacifica CA 94044  
650 355 6788

**San Francisco Planning Department  
EIR Public Scoping Meeting Written Comment Form  
Natural Areas Management Plan  
Case # 2005.1912E**

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*Write your comments regarding the environmental review for the project here. Use the back of the sheet or additional pages if necessary.*

Please take into account  
taking trail in the archery range  
and other hilly areas. Single  
track and bike impacts in that  
area. We need more public  
and legal bike trails.  
Also - the land is in Pacifica - not SF  
give it back B N O G G N R A

Name: Alan H. Borge

Organization (if any): Pacifica Freeride

Address: \_\_\_\_\_

E-mail Address: hi-word@hotmail.com

**San Francisco Planning Department  
EIR Public Scoping Meeting Written Comment Form  
Natural Areas Management Plan  
Case # 2005.1912E**

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The Endangered Species Act identifies 'critical habitat' of 'threatened or endangered species' as the focus of requiring compliance to conservation efforts. The Dept of the Interior, Fish & Wildlife Service lists the criteria for determining what is 'critical habitat' and what is excluded. From this set of criteria the DOI identified 2 units of critical habitat zones w/in San Mateo Co: approx 34,000 acres in the Cabill Ridge area south of Pacific & another similar sized acreage in Pescadero. None of these units include SP. In fact, characteristics of Sleep Park, such as its relatively small size with respect to acreage, its location w/in a developed urban area, qualifying it to be excluded from being a 'critical habitat'.

→ flip

Name: Juanita Mercado

Organization (if any): SPGC

Address: \_\_\_\_\_

E-mail Address: juanitamercado@earthlink.net

In his opening statements in the Apr 30 meeting, Supervisor Mirkarimi stated that the driver for introducing the ordinance to return Shays Park is to protect SF from the liability it incurs by not protecting the threatened or endangered species. Given that Shays Park is not listed as a critical habitat for the threatened or endangered species, what would be the basis of a liability concern with respect to compliance to ESA conservation requirements?

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*Write your comments regarding the environmental review for the project here. Use the back of the sheet or additional pages if necessary.*

- PLEASE CONSIDER TRAIL MASTER PLAN SUBMITTED BY SF URBAN RIDERS WHEN PLANNING TRAIL CLOSURES AND THE BUILDING OF NEW TRAILS.
- PLEASE MAKE NEW TRAILS OPEN TO BIKES
- PLEASE CONSIDER MOTOR CYCLES SEPARATE FROM BICYCLES
- CONSIDER A BICYCLE SPECIFIC PARK IN THE ARCHERY RANGE AND SHOOTING RANGE AREA OF SHARP PARK.

Name: MITCH MONROE

Organization (if any): SF URBAN RIDERS

Address: 565 TALBOT AVE 94104

E-mail Address: MITCH@SFDIRTLAB.COM

**COMMENTS UPON THE SCOPE OF THE EIR FOR SFRPD'S NAP  
(as submitted by Dr. Suzanne Valente, a resident of Pacifica; May 14, 2009 )**

The NAP proposal for Sharp Park as well as the other park locations intends to make major changes in the ecosystems with no apparent benefit to wildlife, and perhaps detriment to important wildlife. Additionally, the NAP parks proposals ignore the serious public safety issues that should be addressed, especially at Sharp Park. An EIR, if it intends to conform with the Precautionary Principle (adopted in 2003 by the City of San Francisco) *must* cover the public safety issues for humans at every park in detail, as well as provide substantial verifiable scientific evidence to justify the proposed ecosystem changes.

Closure of part or the entire golf course to create a "Natural Areas wetland restoration" to benefit the red-legged frog and San Francisco garter snake is the latest proposal under consideration by SFRPD. This is pointless. **US Fish and Wildlife did NOT designate Sharp Park as critical habitat for the red-legged frog or SF Garter snake; therefore by the USFWS' own definition, whatever happens to either species in this area will have no impact upon the ultimate survival or failure of either species. There is NO legal imperative for expansion of the habitat to benefit these two species.** Environmental attorneys explain that there is "critical habitat" and everything else, so Sharp Park has the same requirements as a "habitat" as your home's driveway does. The NAP report acknowledges that the quality of habitat at Laguna Salada, Horse Stable Pond and the adjacent wetlands remains excellent--make the minor alterations biologists recommend and leave the rest of Sharp Park alone.

This plan for Sharp Park is the worst of any in the SF Parks System. It is clearly in violation of the Mission Statement for SFRPD which follows:

*"The San Francisco Recreation and Park Department's Mission is to provide enriching recreational activities, maintain beautiful parks and preserve the environment for the well-being of our diverse community."*

Further, the plan for Sharp Park intentionally disregards the performance standards established in the SFRPD's own Operational Plan. The Operational Plan states *"the Department shall consider, among other matters, the following issues: Public safety, which shall include the reduction of environmental and other hazards, safe equipment operations and safe pesticide use"*. Public safety should always be a first priority, and this proposal ignores public safety in three circumstances.

### **1) VECTOR-BORNE DISEASES**

Experts say "Biohazards are the greatest threat to humankind", and among them are the diseases mosquitoes carry and pass on to the victims of their bite. The mosquito has caused more human suffering than any other organism known to mankind. One million people die from mosquito-borne diseases every year, and about half of the world's population is at risk. World history is replete with reports of the life threatening diseases transmitted by mosquitoes including West Nile Virus, Eastern Equine Encephalitis, Malaria and Dengue.

The Centers for Disease Control (CDC) cites West Nile virus as the biggest mosquito-borne threat facing Americans, just a few years after being detected in the United States. The Centers for Disease Control reports West Nile virus is spread by infected mosquitoes, and can cause serious, life-altering and even fatal disease. In 2008, CDC records show California reported a total of 445 serious West Nile cases, 15 of which resulted in deaths. California reports fully a third of all West Nile virus cases and deaths reported in the entirety of the United States. On August 15, 2005, San Francisco health officials confirmed the City's first human case of West Nile virus.

The threat of mosquito breeding in the wetlands at Sharp Park which support the red-legged frog and San Francisco garter snake is currently severe enough to warrant treatment by helicopters with larvicide, as well as

spraying with pesticides on the ground every three weeks during the mosquito "season". California Health and Safety Code mandates San Francisco pay for this mosquito control. On January 7 of this year, a court ruling effectively bans the San Mateo County Mosquito Abatement District and 45 other mosquito abatement districts in the state of California from spraying pesticides to kill adult mosquitoes. Therefore, if any mosquito larvae survive the larvicide treatment (which they have in past years with no exception) SMCMAAD is helpless to protect the public from any diseases they may carry, including West Nile virus. **There is no dispute expanding the wetlands will create a situation where mosquito breeding is clearly impossible to reliably control.** Changing pesticide regulations as well as the genetic evolution of pesticide-resistant species of mosquitoes are but two reasons that this is the case.

In fact, San Francisco Recreation and Park Department acknowledges the mosquito problem in their "**System Wide Management Actions and Practices**" document pertaining to significant natural areas. Section 5, page 22 of that document states:

*"First detected in the United States in 1999, West Nile virus (WNV) is a mosquito-borne disease that is common in Africa, west Asia and the Middle East. In 2004, there were a total of 829 WNV human infections, from 23 counties in California. West Nile virus activity has been detected in all counties, but there have been no cases reported from San Francisco (DHS 2005). Although it can be fatal to birds (and even humans), most of the people infected with WNV do not exhibit any symptoms. The San Francisco Health Department currently participates in the statewide IPM program targeting WNV. In Natural Areas, two types of BMPs [Best Management Practices] are recommended:*

*1. Staff should be provided education regarding the most effective way to avoid contracting WNV, which is to not get bitten by mosquitoes. Clothing such as long pants, long-sleeved shirts, and application of a mosquito repellent may all be helpful in this regard. Volunteers and site stewards working with the program should also be informed.*

*2. Some Natural Areas contain small water features such as abandoned tires and other refuse that holds water. These features could provide breeding habitat for mosquitoes. At times it may be feasible to remove the water from these areas or to treat the features with BT (*Bacillus thuringiensis israeliensis*), a safe and ready to use biocontrol treatment for mosquitoes. In other cases, removal of water cannot occur without damaging a sensitive resource."*

The NAP plans for Sharp Park include cutting down 15,000 mature eucalyptus trees on the east side of Highway One in Sharp Park. Additionally, destruction of eucalyptus saplings and seedlings (these are by common definition trees) in areas designated by NAP shall be in total. NAP officials do not believe they need to be accountable to the public for the number of seedlings or saplings they remove.

These trees are targeted merely because they are defined by NAP as non-native, yet they provide habitat for 20 species of special status birds. The eucalyptus are to be cut down to create more scrub habitat. Scrub habitat exists on the hillsides all around Sharp Park! It is in abundance on Milagra and Sweeney Ridges, where it is protected and enhanced by the GGNRA (National Park Service). Why would you jeopardize the only habitat in the area for these special status birds? Also, the pattern and velocity of the winds in this area will be altered by the destruction of 15,000 mature trees as well as all others. This may well negatively affect the conditions in the remaining tree stands for those same birds should they attempt to relocate due to their displacement due to NAP. Additionally, the City of Pacifica has the ability to block this ideologically driven destruction of the ecosystem by virtue of the City of Pacifica's anti-logging ordinance and the citizens of Pacifica intend to demand their City officials hold the SFRPD to the terms of this ordinance.

## CITY OF PACIFICA TREE ORDINANCES AND PERMITS

### **Logging Operations in Pacifica**

Logging operations within the City of Pacifica are defined as any removal, destruction or harvesting of 20 or more trees within one year from any parcel or contiguous parcel in the same ownership. In reference to logging regulations, a tree is defined as any tree six inches in diameter as measured 12 inches from the ground. City of Pacifica Ordinance No. 636-C.S. prohibits logging operation unless one of the following conditions is met:

- \* (a) Said operations are in conjunction with a city permit(s) requiring planning commission and/or city council approval, at which time said operations shall be evaluated and approved or denied at a duly noticed public hearing by the commission and /or council, concurrently with the other permit(s).
- \* (b) Said operations are necessary immediately for the safety of life or property, as determined by the director of public works or his/her designee.
- \* (c) Said operations occur on city-owned property and are necessary immediately to maintain public health and safety.

Refer to Ordinance No. 673-c.s. for more information concerning logging operations within the City of Pacifica.

### **The NAP proposal for the east side of Highway One is not without its biological hazards to humans, wildlife and our pets.**

Excerpts from San Francisco's "Natural Areas Program" (NAP) state:

"Issue: Important elements within natural habitats for the survival of small mammals as well as reptiles and amphibians include underbrush, fallen logs...debris such as lumber, brush piles...piles of abandoned lumber may be aesthetically unpleasing but provide important refuge habitat for many species...

Recommendation: The natural or biodegradable (branches trees and logs) elements shall be preserved during vegetation management activities or replaced with brush piles."

The Western Treehole Mosquito is the primary vector of Dog and Cat Heartworm in California. The Western Treehole Mosquito is so named because its immature stages frequently develop in rot holes of tree stumps such as oaks, laurels, eucalyptus, sycamores, etc. Unfortunately, because NAP cuts down 15,000 mature eucalyptus trees and fails to remove their stumps, they have created an ideal breeding ground for the Treehole Mosquito, as well as additional breeding grounds for the aforementioned mosquitoes which carry West Nile virus.

Many dogs and cats show the first visible indications of heartworm infection only after the disease has progressed to the point where treatment is no longer feasible and death becomes imminent.

**Unfortunately, there's more.** Locally, urban residents are noting for the first time ticks which can transmit Lyme and other diseases upon their own person, even if they have not been outside of their immediate neighborhood. They have also noted a dramatic increase in the number of the same ticks found on their dogs and cats as compared to previous years.

*"The District was contacted from residents of Belmont (near Water Dog Lake) and Pacifica with concerns about ticks in their neighborhoods. In Pacifica, questing ticks can be found in the open spaces between homes. In Belmont, western black-legged ticks were found inside a home adjoining the open space around Water Dog Lake, presumably brought in by the family cat. These instances illustrate the need to watch out for ticks even if one does not engage in outdoor activities at this time of year."*

(Excerpted from SMCMA Entomology Report, January, 2007)

A study conducted at the Institute of Ecosystem Studies in New York and published in 2006, concludes that the risk of Lyme disease is correlated positively with the prevalence of small mammal hosts and the abundance of

their food supply, not the number of deer or fluctuations in climate. The small mammal hosts carry the ticks into residential neighborhoods when they search for food and/or shelter.

CDC recommends the use of landscaping techniques to create a tick-safe zone around homes, parks, and recreational areas:

- Removal leaf litter, brushpiles and woodpiles.
- Clear tall grasses and brush.
- Place wood chips or gravel between lawns and wooded areas to restrict migration to recreational areas.

**The environmental features the CDC instructs you to remove to protect you, your family and your community from ticks are precisely the environmental features these Park managers are proposing to enhance habitat for small mammals and to satisfy their obsession with the removal of non-native plants and trees.**

The CDC reports that Lyme disease is the most common vectorborne disease in the United States. Since Lyme disease became nationally notifiable in 1991, the annual number of reported cases has more than doubled.

## **2) EROSION**

The safety concern posed by erosion on the portion of Sharp Park east of Highway One is acknowledged in the NAP proposal as being serious, but is specifically designated as a problem that will be addressed as a last priority “when capital funds are made available”. This is absolutely unacceptable. The erosion problems should be addressed immediately, before funds are spent on habitat creation. Further, the removal of 15,000 mature eucalyptus trees as outlined in this proposal could certainly make the erosion problem worse.

## **3) TOXIC LEAD IN THE SOIL**

The serious safety concern posed by toxic lead in the soil (way in excess of environmental screening levels) east of Highway One has been ignored for many years, and is briefly mentioned in this report. No time table has been set for cleanup and the promise to complete cleanup has been made and broken many times before. Prior communications with the Health Department of San Mateo County have cited the cost of the cleanup as being an impediment to its undertaking.

The impact of the lead upon the wildlife in that area is another concern. The perimeter fencing around the toxic lead area is not an impediment to the entry of many small forms of wildlife which are subsequently harmed by the toxic effects of the lead.

The possibility of the lead leaching into the groundwater, the stream in the canyon and flowing to Laguna Salada wetlands across the freeway would result in the contamination of the very sites this plan spends huge amounts of money to restore. Erosion and lead contamination present clear and present dangers to the human and wildlife population living adjacent to and frequenting that area. The failure to implement NAP at Sharp Park would minimize the risk of vector-borne diseases, and the money intended for NAP would be best utilized to address the public safety issues; the erosion and the toxic lead soil and water contamination.

This EIR should not ignore the opinions of experts who do not agree with the implementation of NAP as it is currently proposed. Take for example, the following letter from an ecologist and Professor from UC Davis, Arthur M. Shapiro:

UNIVERSITY OF CALIFORNIA, DAVIS

Division of Biological Sciences  
Section of Evolution and Ecology  
Fax (530) 752-1449

7 May 2002

The Hon. Gavin Newsom  
Chairman, Neighborhood Services Committee  
San Francisco County Board of Supervisors  
City Hall, 1 Carlton B. Goodlett Place  
San Francisco, CA 94102

Dear Supervisor Newsom:

Re: Natural Areas Program (Rec. & Parks)

Because of both personal friendship and professional contacts in The City, I have been following the controversy over native plants and natural areas management and the removal of exotic tree species from public lands in San Francisco. I am a professional ecologist and have been teaching at U.C. Davis for over 30 years. During that time I have trained many professional environmental scientists and consultants. My former students are scattered over a variety of government agencies at several levels, firms in the private sector, and colleges and universities from Massachusetts to Texas to Florida, as well as California. I began teaching a course on the community concept in ecology at UCD in 1972, which has always contained a section on introduced, exotic and naturalized species in community context, with examples drawn from California - long before it became fashionable. I was on the phthisis committee of James Carlton, the foremost US authority on weedy marine invertebrates. I have led California Native Plant Society and Sierra Club field trips in the Sierra Nevada and Central Valley for many years and do frequent presentation on butterfly gardening. I am telling you all this to try to establish credibility, because what I am about to say will be controversial - to say the least.

There is a widespread perception that the Natural Areas Program is spinning out of control: that it has overreached far beyond its goal of preserving the remnants of natural vegetation still extant in SF parklands and is now engaged in a campaign of restoration ecology in which overwhelmingly human-modified or - created landscapes are being removed to allow for the recreation of natural ones, or - more accurately - a simulacrum thereof.

The management of public open space necessarily involves a variety of tradeoffs. In a spatially highly constrained area like San Francisco, public open space is precious, and many members of the public are very strongly committed to its well - being. My emeritus colleague Seymour Gold at Davis, as well as other researchers, long ago demonstrate that urban open-spaces users have distinct psychological needs and preferences in landscapes - and that mature trees in specific spatial configurations tend to dominate those preferences. The anthropogenic landscapes we associate with SF parklands are in fact very close to the ideal. It is not surprising that they are so loved by their users.

As a teacher of conservation biology, I know it is important. I also know that it can be carried to extremes. In an urban setting - and San Francisco is such a setting! - it has its place, but it cannot be the dominant value in open-space management. It has to be integrated into a broader context that will be not only politically palatable but in fact pleasing to the public. With a graduate student, I have recently conducted and published a study showing that regulatory styles perceived as arbitrary and authoritarian can and have pushed groups of people normally friendly to environmentalism and conservation - in our study, butterfly collectors - into anti-government positions within the so-called "Wise Use" movement. I see the same process at work in San

Francisco, where a highly educated, sophisticated, politically liberal urban population is being needlessly turned against what it perceives as "environmentalism" run amok. Sierra Club members and butterfly gardeners are beginning to talk like the ranchers I interact with in Siskiyou and Lassen Counties.

The Natural Areas Program has its place, and it needs to be kept in that place. It cannot be allowed to trump the clear preferences of the vast majority of parkland users in San Francisco. The hatred of "exotic" trees, some of which are California natives anyway, is not only ideological but sometimes verges on the pathological, and has strong overtones of xenophobia and racism (look at the anti-"exotic" rhetoric yourself!). Senile, decadent, hazardous trees are numerous and pose a public-safety and fire problem that needs to be addressed. Healthy trees in pleasing, integrated landscapes are another story. "Native" nature can be preserved and augmented without damaging the peace of mind of San Franciscans. And should be.

Sincerely,

Arthur M. Shapiro  
Professor of Evolution, Ecology and Entomology  
Center for Population Biology, UC Davis

Further, the deed transferring Sharp Park to San Francisco will be voided should any part of the golf course be destroyed to create wetlands habitat. The documents that transferred the land to San Francisco control state: "This grant is made upon and subject to and in consideration of the express condition that the premises hereinabove described and hereby conveyed shall be used by said City and County of San Francisco only for a public park, or public playground, to be known as the 'Sharp Park', without right to sell or dispose of the same or any part thereof for private use, or any use other than as a public park, or public playground".

Some may claim that converting Sharp Park into wildlife habitat fulfills the "public park" requirement. But the rule of law demands that the interpretation of the words in a contract be guided by the intent of the parties to the contract at the time the contract was signed. It is pretty clear what a public playground was, but what did they mean by a "public park" in 1917 when the deed was transferred? Consider the 11th Edition of the Encyclopaedia Britannica (published 1911) in which the term PARK is defined as follows:

**PARK** (Fr. *part*; Ital. *parco*; Sp. *parque*; O.Eng. *pearroc*; connected with Ger. *pferch*, *fold*, and *pfarrei*, district, translating med. Lat. *parochia*, parish), a word ordinarily used in two senses: (a) an enclosed tract of ground, consisting of grass-land, planted with trees and shrubs, and surrounding a large country house; (b) a similar space in or near a town, laid out ornamentally, and used by the public as an "open space" for health or recreation.

It is clear that the parties to this contract would have approved of a golf course, but NOT a wetlands habitat for the express purpose of supporting frogs and snakes.

If you go to the City of San Francisco Real Estate Department and review the correspondence leading up to the transfer of the property, it is clear that the imposition of this "public park" restriction was not a whim. On the contrary, it was an adamant demand without which the property owner refused to transfer the property.

It is clear that any Court reviewing these documents would find the proposed property change to be in violation of the transfer documents and therefore Sharp Park would revert to the State of California (as specified in the deed), who would be bound by the same restrictions. Should the State fail to meet these restrictions, the property would revert to the heirs or legal representatives of the original grantor, Samuel G. Murphey. This issue should be addressed seriously as a part of this EIR as legal challenges to any decision to remove all or a portion of the golf course will be promulgated and likely be successful.



350 O'Shaughnessy Boulevard • San Francisco, California 94127  
Telephone: (415) 281-0892

## Miraloma Park Improvement Club

May 16, 2009

**RECEIVED**

Bill Wycko  
Environmental Review Officer  
San Francisco Planning Department  
Natural Area Management Plan  
1650 Mission St  
San Francisco, CA 94103

MAY 19 2009

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
M.F.A.

Re: Initial Study, Significant Natural Resource Areas Plan: Mount Davidson Park

Dear Mr. Wycko,

While the Miraloma Park Improvement Club supports the creation of a natural area plan (NAP) for Mt. Davidson to help preserve the natural area on the east side of the park, we are concerned about the environmental impact of the planned tree removal and trail closure in the historic forest area. We therefore support the finding of the initial study that the proposed project may have a significant potential negative impact on Mt. Davidson Park, which is an important example of a major period of California history, and may have environmental effects that would cause substantial adverse effects on human beings. We ask that a full environmental impact report be completed and that it address the following potential impacts:

1. Clearing of the trees to the great extent proposed in the NAP would significantly reduce the quality of human experience of this unique forest and viewpoint atop San Francisco's highest hill by: (1) eliminating a buffer from substantial noise pollution from the 280 freeway, BART, and Portola Drive; (2) altering the wind and fog pattern in the park and adjoining neighborhoods, because the trees provide protection from the prevailing westerly wind and fog; (3) promoting the growth of poison oak along trails, which fills in the areas where the trees are cut down and makes the trails unsafe for public use; and (4) promoting erosion and landslides onto trails and adjoining homes, environmental damage that is prevented by the existing trees.
2. The substantial cost of removing and replacing the trees would divert limited Recreation and Parks Department resources for providing basic maintenance of Mt. Davidson Park, including litter and graffiti removal, trail maintenance, and signage. Diversion of these funds would degrade the public's experience of the park.

3. Removal of as many trees as proposed in the NAP would significantly impair the current habitat for birds and animals provided by the forest.

Additionally, we believe that the NAP should also be assessed for the appropriateness of its proposals with respect to the status of both the Park and the Mt. Davidson Cross as important historical entities. The park and monument are important examples of a major period of CA history, as the historic trees were planted on Mt. Davidson over a century ago by Mayor Adolph Sutro to celebrate the nation's first Arbor Day. Naturalist poet, Joaquin Miller, inspired the planting of the trees. The forested hill was named for George Davidson at the request of the Sierra Club. The park's creation was a three-year community effort in 1929 in order to protect the trees as a scenic resource for enjoyment by the public. If not for this historic effort to protect the trees from destruction to make way for housing, there would not be a natural area left undeveloped on the east side of Mt. Davidson. Therefore, the NAP should record and document the existing resources in preparation for listing on the California Register of Historical Resources. Furthermore, any historical trails created and enhanced as Works Progress Administration projects during the Great Depression proposed for closure by the NAP should be maintained and should remain open to the public.

Mitigation measures for any approved NAP tree removal and trail closure should include documentation of all trees removed or fallen from storm in the park; advanced public notice of any further tree removal; removal of any downed trees to maintain the aesthetic quality of the forest and park; quarterly removal of all poison oak within 10 feet of trails; and maintenance and protection of WPA trails and retaining walls. Any activity for implementation of the NAP should not restrict public use of the park or access to the historic area or viewpoints for more than 30 days at a time.

Thank you for your attention to this matter.



Dan Liberthson, Corresponding Secretary

c: Supervisor Elsbernd

San Francisco Planning Department  
EIR Public Scoping Meeting Written Comment Form  
Natural Areas Management Plan  
Case # 2005.1912E

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MAY 18 2009  
CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
MEETING

If you wish to submit written comments on the above project, you may do so on this sheet (although use of this form is not required). Please submit written comments at today's public scoping meeting, or by mail to Bill Wycko, San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA 94103. **All comments must be submitted no later than 5 P.M., May 26, 2009.**

*Write your comments regarding the environmental review for the project here. Use the back of the sheet or additional pages if necessary.*

I AM A GOLFER AND AN ENVIRONMENTALIST (A SIERRA CLUB + WILDERNESS SOCIETY MEMBER), IF I THOUGHT THE GOLF COURSE WAS HARMING THE FROGS AND SNAKES I WOULD BE AT THE FOREFRONT OF OPPOSITION TO THE GOLF COURSE. BUT I KNOW DIFFERENTLY.

SINCE IT WAS MADE KNOWN THAT PUMPING-OVERFLOWING WATER OFF THE GOLF COURSE WAS DETRIMENTAL TO THE FROGS AND THAT PRACTICE AS WELL AS PESTICIDE USE ENDED A FEW YEARS BACK, I'M SURE THE FROG NUMBERS HAVE INCREASED. IF THEY HAVEN'T I'M SURE ITS NOT BECAUSE OF THE GOLF COURSE. THE GOLF COURSE IS NOT HARMING THE FROGS. THIS IS A RED HERRING ARGUMENT

MANY GOLF COURSES GO THROUGH ENVIRONMENT SENSITIVE AREAS. BODEGA BAY, TEAL BEND (SACRAMENTO) MONARCH BAY (SAN LEANDRO) AND STONEBRAE (HAYWARD) (WHICH JUST OPENED IN PRIME RED LEGGED FROG HABITAT, ARE JUST A FEW OF MANY SUCH COURSES THAT COME TO MIND.

I HEARD THE ARGUMENT ABOUT USING THE GOLF COURSE AREA BY THE LAGOON FOR CHILDREN'S ENVIRONMENT EDUCATION AND OPEN SPACE, BUT THIS LAGOON EXTENDS BEYOND THE SOUTHERN BOUNDARY OF THE GOLF COURSE THAT IS EASILY ACCESSABLE TO THE PUBLIC FOR THIS CAUSE, BUT I HARDLY EVER SEEN IT USED FOR THESE ACTIVITIES.

THERE IS PLENTY OF OPEN SPACE AREA SURROUNDING THE GOLF COURSE AND MORAY'S POINT FOR HIKING, BIKING, NATON'S STUDY ETC IT'S NOT LIKE THE GOLF COURSE IS IN THE MIDDLE OF DOWNTOWN SAN FRANCISCO.

(OVER)

Name: George Ambrosio

Organization (if any): SAN FRANCISCO JUNIOR GOLF (32 year RECEPTION & PARK EMPLOYEE RETIRED)

Address: 2491 WHITMAN WAY, SAN BRUNO 94066

E-mail Address: \_\_\_\_\_

THERE IS NO REASON TO ALTER OR DESTROY THIS GREAT RECREATION FACILITY, THE PLANNING COMMISSION SHOULD LOOK INTO THINNING THE REEDS CHOKING THE LAGOON WHICH WILL GIVE MORE ROOM FOR THE WATER IN THE LAGOON, THIS WOULD PREVENT OVERFLOW ON THE GOLF COURSE WHICH WILL HELP THE FROG AND THE GOLF COURSE, MAKING IT MORE PLAYABLE DURING THE WET SEASON AND ATTRACTING MORE GOLFERS AND IMPROVING REVENUE.

SHARP PARK GC IS A WORK OF ART CREATED BY ONE OF MOST FAMOUS GOLF COURSE ARCHITECTS. MR. ALISTER MACKENZIE, ONE OF ONLY FOUR GOLF ARCHITECTS ENSHRINED IN THE GOLF HALL OF FAME.

SHARP PARK IS AND SHOULD BE ONE OF SAN FRANCISCO'S GREAT ASSETS.

IT WOULD BE TRAGIC AND CRIMINAL TO ALTER OR DESTROY ONE OF SAN FRANCISCO'S FINEST ATHLETIC RECREATIONAL VENUES UNNECESSARILY.

RECEIVED

San Francisco Planning Department  
EIR Public Scoping Meeting Written Comment Form  
Natural Areas Management Plan  
Case # 2005.1912E

MAY 19 2009

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
M E A

If you wish to submit written comments on the above project, you may do so on this sheet (although use of this form is not required). Please submit written comments at today's public scoping meeting, or by mail to Bill Wycko, San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA 94103. **All comments must be submitted no later than 5 P.M., May 26, 2009.**

*Write your comments regarding the environmental review for the project here. Use the back of the sheet or additional pages if necessary.*

It is my understanding that prior to the seawall being built Laguna Salinas Pond & Horse Stable Pond were flooded with seawater an unfriendly habitat for both the frog & the snake. Then came the mother of all floods, the creek engineers (Army) and the sea wall with no drainage allowed for both creeks at the north end & south end of L.S. Hence today's problem. Formerly both creeks emptied directly to the ocean now the water collects and creates the flooding & habitat for frogs & snakes.

The city has no \$ to fix this problem. Since the Army Corps of E created the problem they should be made to rectify the situation. Since the creeks are the problem the north creek should be made to empty into the ocean. The south creek (Sanchez end) should be redirected to the N end of Merri Point and used to help grow frogs & snakes (Diversity Group has a half a dozen ponds on site and I'm sure would welcome the freshwater).

Name: FRANKIE E FITZGERALD

Organization (if any): Preserve Startup Park 18 Hole Golf Course

Address: 1064 PK Pacific Ave, Pacific CA 94044

E-mail Address: f + frankie @ earthlink . net

Thank You

SNRAMP -  
NOP



Dayton Crites  
<dayton@surbanriders.org>  
Sent by:  
daytoncrites@gmail.com

To Jessica.Range@sfgov.org

cc

bcc

05/20/2009 02:31 PM

Subject Consider off-road bicycle use in SF's open space EIR.

Ms. Jessica Range,

I am writing you to address the EIR that will analyze various needs and uses of San Francisco natural areas. I feel that too often, the needs of recreational trail users are overlooked, especially those of mountain bike users.

I urge the government of San Francisco to consider the development of multi-use trails, and bicycle skills parks to be considered as sustainable uses of our open spaces and parks. I work closely with SF Urban Riders, a non-profit committed to working with the city to provide these resources to her citizens.

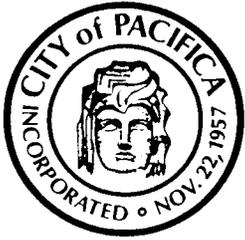
Off road cycling is a fast growing sport that already enjoys a diverse and large following in the bay area. Besides its healthy benefits to the community and users, Mountain bikers are a largely untapped resource of volunteer labor and stewardship for our public lands, as has been demonstrated in the successful partnership between sfurbanriders and mt. sutro stewards in creating San Francisco's first true multi-use trail system.

Lastly, Mountain Biking has been shown to be of equal or less detriment to trail systems than hiking, and less damaging than equestrian use. Resources that back this claim can be found [here](#).

Please let me know you have any questions, and thank you for your time.

Sincerely,

Dayton Crites  
[sfurbanriders.org](http://sfurbanriders.org)



*Scenic Pacifica*

**CITY HALL**

170 Santa Maria Avenue • Pacifica, California 94044-2506

www.ci.pacifica.ca.us

**MAYOR**  
Julie Lancelle

**MAYOR PRO TEM**  
Sue Digre

**COUNCIL**  
Peter DeJarnatt  
Mary Ann Nihart  
James M. Vreeland, Jr.

**RECEIVED**

**MAY 26 2009**

**CITY & COUNTY OF S.F.**  
PLANNING DEPARTMENT  
M E A

May 22, 2009

Mr. Bill Wycko  
San Francisco Planning Department  
Natural Areas Management Plan  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

Re: Notice of Preparation of an Environmental Impact Report  
dated April 22, 2009 Project Title: Natural Areas Management Plan (aka Natural  
Resources Areas Management Plan)

Dear Mr. Wycko:

Thank you for providing this initial study and Notice of Preparation (“NOP”) and for conducting a scoping meeting in our community. We appreciate the acknowledgement that since the Sharp Park property is located within the boundaries of the City of Pacifica, we are naturally very attentive to any changes or alterations proposed for this site. Upon reviewing the NOP, we noted several items related to our Land Use regulations that were not included in the NOP and that should be acknowledged in the EIR documents.

This letter serves as the response of the City of Pacifica (“Pacifica”), a Responsible Agency as defined in California Public Resources Code Section 21080.4(a) and 14 California Code of Regulations Section 15082(b), to the above referenced Notice of Preparation (“NOP”).

The NOP does not identify discretionary approvals required by Pacifica for the Natural Area identified as “Sharp Park”, which is located in the jurisdiction of the City of Pacifica. The City and County of San Francisco (“San Francisco”) must comply with the California Coastal Act. Pacifica has a certified Local Coastal Program (“LCP”) pursuant to which Pacifica enforces Coastal Act regulations in the Coastal Zone within Pacifica’s boundaries. That portion of Sharp Park west of Highway One is within the Coastal Zone, and is identified in the LCP. Thus, for projects affecting west Sharp Park such as this, San Francisco needs to obtain a Coastal Development Permit (“CDP”) and comply with it. Please include the CDP in the list of discretionary approvals required to be analyzed in the EIR and throughout the discussion in the document.

**CITY MANAGER'S OFFICE**  
TEL (650) 738-7301  
FAX (650) 359-6038

**CITY ATTORNEY**  
TEL (650) 738-7409  
FAX (650) 359-8947

**CITY CLERK**  
TEL (650) 738-7307  
FAX (650) 359-6038

**CITY COUNCIL**  
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FAX (650) 359-6038

**ENGINEERING**  
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FAX (650) 738-3003

**FINANCE**  
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FAX (650) 738-7411

**FIRE ADMINISTRATION**  
TEL (650) 991-8138  
FAX (650) 991-8090

**HUMAN RESOURCES**  
TEL (650) 738-7303  
FAX (650) 359-6038

**PARKS, BEACHES  
& RECREATION**  
TEL (650) 738-7381  
FAX (650) 738-2165

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ECONOMIC DEVELOPMENT**  
TEL (650) 738-7341  
FAX (650) 359-5807  
• **Building**  
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• **Code Enforcement**  
TEL (650) 738-7343

**POLICE DEPARTMENT**  
TEL (650) 738-7314  
FAX (650) 355-1172

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TEL (650) 738-3760  
FAX (650) 738-9747

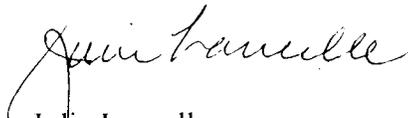
Further, the proposed project is subject to Pacifica's Logging Operations Ordinances, Ordinance Numbers 636 C.S. and 673 C.S. Any tree removal, destruction or harvesting of twenty or more trees within one year is prohibited unless in conjunction with a Pacifica permit (such as the CDP) or unless the Pacifica Public Works Director makes specific findings regarding the tree removal operations. Again, please include these regulations in the environmental discussion.

In addition, Topic 14, "Hydrology and Water Quality", subsections (a), (c), (d), (e) and (h) reference the need for the EIR to study the proposed project's impacts on drainage patterns and flood hazards within the Sharp Park area. Pacifica concurs that the EIR must study those potential impacts, and emphasizes the need to study the risk of flooding not only within Sharp Park itself, but whether the proposed project will result in flooding of the adjacent residential areas, and, if so, propose appropriate mitigation. In addition, the EIR should address the effect that removing 54,000 trees will have on erosion and drainage patterns.

Pacifica reserves its rights to comment in greater detail on the contents of the initial study until the City has the opportunity to review a full draft EIR.

We appreciate your attention to these matters.

Sincerely,



Julie Lancelle  
Mayor

Cc: City Council  
City Manager  
City Attorney  
City Planner

May 21<sup>st</sup>, 2009

Bill Wycko, Environmental Review Officer  
SF Planning Department  
Natural Areas Management Plan  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

Dear Mr. Wycko,

Thank you so much for the enlightening Public Scoping meeting last May 14<sup>th</sup>. I very much appreciated being presented with Lisa Wayne's Management Plan and with the CEQA objectives.

My family frequently uses Glen Canyon Park and Bernal Hill for walking and enjoying the outdoors as well as introducing our daughter to the wildflowers, plants, rocks, birds and bugs that can still be found in these exceptional areas. We also enjoy exploring Billy Goat Hill, Tank Hill, Duncan-Castro and McLaren Park.

I have reviewed the SNRA Management Plan. I was encouraged to see that in the MA-1 and MA-2 areas described in the Management Plan, there will be a comprehensive effort to attempt to restore natural areas to their original state.

I would like to suggest that the MA-3 areas be treated in a manner similar to the MA-2 areas. I understand that it is imperative to move quickly to preserve the native plants and geology in the MA-1 and MA-2 areas. The MA classifications are obviously meant to prioritize this. However, in order to create a congruent landscape in the long run, the MA-3 areas should be managed congruently with the other areas.

### **Replant MA-3 Areas with Bay Area Native Oak Savannah Trees**

As the SNRA Management Plan now stands, there is no plan to gradually replace the eucalyptus groves with native trees such as coast live oak:

**Recommendation GR-15b:** In order to maintain the forest as it ages, it is necessary to maintain a stocking rate that will perpetuate the urban forest and promote forest health. Over time, it will be necessary to grow a new age class of trees, which will eventually replace the existing mature canopy. This will be accomplished through natural and artificial regeneration methods. Natural regeneration refers to the seedlings and saplings that establish naturally. Blue gum eucalyptus is likely to be the primary species that regenerates naturally although the other invasive species also regenerate. Artificial regeneration refers to the planting of trees by people for management purposes. California native trees that offer the greatest value to wildlife such as Monterey cypress, Monterey pine and Douglas fir (*Pseudotsuga menziesii*) will be used. Tree planting can take advantage of openings in the urban forest canopy that are created either naturally or from other management activities.

I would ask that the decision to include Eucalyptus, Monterey Pine and Monterey Cypress in the reforestation of these GR-15b areas be reconsidered. These trees discourage the growth of an understory in the forest. Coast Live Oak savannah, so prevalent in the savannah areas of Yerba Buena Island and Palo Alto, obviously were also prevalent in San Francisco. It would be a shame not to feature these beautiful, drought tolerant, fire resistant trees and grasses in replanting efforts.

## **Carbon Sequestration**

A concern for maximizing carbon sequestration in order not to further contribute to climate change has been expressed. I share this concern.

I would like to mention that it is increasingly apparent that deeply rooted grasslands sequester carbon permanently underground while rapidly growing trees such as eucalyptus sequester carbon temporarily and not as efficiently as native bunch grasses.

I would ask that the CEQA look carefully at this. The 2008 Hohhot World Temperate Grasslands Declaration, sponsored by the World Conservation Union, a United Nations affiliate, states:

“Considering that temperate indigenous grasslands provide critical ecological goods and services essential for life on earth as a source of food, fibre, human livelihoods and well being, cultural and biological diversity, the recharge of aquifers and the sequestration of carbon, particularly in the face of global climate change . . . we the participants of the Hohhot World Temperate Grasslands Conservation Initiative Workshop from five continents and 14 countries, declare that temperate indigenous grasslands are critically endangered and urgent action is required to protect and maintain the services they provide to sustain human life. We call upon all sectors of society to collaborate towards this goal.”

The United States is a signatory of this declaration. According to the signatories of this declaration, the relative sequestration of eucalyptus forest versus native grassland is not well understood. However, it is becoming increasingly clear that native grasslands play a key role not only in carbon sequestration, but in the preservation of the world’s biodiversity. It seems that the indigenous grasslands of San Francisco are critically endangered as are most of the world’s grasslands.

## **Maintain Management of MA-3 areas in NAP**

I would also ask that the MA-3 areas be managed, along with the MA-2 and MA-2 areas, in the Natural Areas Program. This will allow for management economies in the use of labor and forestry resources. The suggestion that the MA-3 areas be managed by the Bureau of Urban Forestry would be disastrous for the overall goal of the Natural Areas program.

If there is any doubt that the Bureau of Urban Forests is terribly under resourced, I would ask CEQA and the Bureau of Urban Planning to consider this example: The Bureau of

Urban Forests repeatedly claims that they do not have the funds to fix a College Avenue city sidewalk in their jurisdiction which poses a tripping and liability hazard to the city.

Again, a partitioning of the management of MA-3 areas would be disastrous for the overall goal of restoring esthetic and biological continuity to the city's natural areas.

### **Work toward Walkability in and between the City's Natural Areas**

I was encouraged to see that the Management Plan included a vision of trail building. There are many beautiful trails in the city. Some of these are in the process of being rebuilt. I was lucky enough to be on a trail building crew in Glen Park last year.

I would suggest that an overall plan be made for the Natural Area trails. The plan should extend beyond the boundaries of the natural areas, interconnect natural areas where possible, and connect natural areas to public transit. An attempt should be made to map trails or walking routes that exist through open spaces, city parks and urban areas. They should incorporate the city's neglected stairways. Such a plan might take many years to execute, but it would mean that there are not wasted efforts with trails built to nowhere.

Some examples of potential trails that I can think of are to connect Glen Canyon Park to Twin Peaks or Glen Canyon Park with Walter Haas Park and Billy Goat Hill.

### **Reconsider the Impact of Off Leash Dogs**

As the parent of a small child and as a life long owner of dogs, I have spent quite a while considering how the city's dog policy works in practice, rather than theory.

First, I would suggest that San Francisco does not have the rain that most North American cities have. In fact, it is a highly populated area in a near desert. Virtually all of the rain the city gets is in the winter. The rest of the year, the city has no rain. By August, I find myself avoiding going to areas such as Bernal Hill and Glen Canyon Park because of the dog urine and general dirtiness of these areas. It is always a great relief to get the first rain.

I have also observed that most dogs are not walked on leash, even in leash areas such as Glen Park. I try to be considerate toward dogs and their owners on this matter. However, I find myself carefully assessing the breed and disposition of dogs as to their risk to my child. Many people are not as comfortable or knowledgeable with dogs. I know many people who avoid natural areas for this reason, especially parents of young children. This does represent a lost opportunity for children. They are less likely to be taken into natural areas due to the ubiquitous presence of off leash dogs.

Research does indicate that children are more likely to be bitten by a dog than an adult. Children are often at eye level to a dog. Many dog attacks are unprovoked and can result from something as simple as the dog misinterpreting eye contact or an outstretched hand.

In dog play areas, such as the road on Bernal Hill, I have found that I am increasingly uncomfortable going there. There almost always seems to be a dog fight or a dog rushing me in the legs. Many dogs are walked by dog walkers with multiple dogs and these dogs are thus poorly under control.

Again, if the intent is to allow people to experience natural areas, the current behavior of dogs and their owners is limiting this experience. The policy of allowing dogs, who are almost never on leash, access to natural areas should be reassessed. Dog Play areas should be reexamined in light of the lack of control of dogs and the environmental impact. The need to allow children to experience natural areas should be considered, not just the needs of dogs and dog owners.

I thank the Planning Department for the opportunity to express my appreciation for this planning process as we work toward a management plan of the natural areas in our beautiful city.

Most sincerely,

Marnie Dunsmore  
118 College Avenue  
San Francisco, California  
94112

May 21, 2009

Bill Wycko  
San Francisco Planning Department  
Natural Areas Management Plan  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

RE: Comments on Notice of Preparation of an EIR for  
The Natural Areas Management Plan (SNRAMP)  
Case Number 2005-1912E

**RECEIVED**

MAY 21 2009

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
M E A

Dear Mr. Wycko:

Enclosed are our comments on the notice of preparation of an EIR for the Natural Areas Management Plan (SNRAMP). We are a team of park advocates with a vision of the Natural Areas Program (NAP) that acknowledges the co-existence of recreation and urban natural areas, which is guided by science, that embraces a diverse biophilia, and that ensures the public's safety in our parks. Our combined experience to achieve these objectives includes:

- 2002 SF Recreation and Park Department, Green Ribbon Task Force for NAP plans
- 2002 – present CC of San Francisco, Parks, Recreation, Open Space Advisory Committee
- 2003 - 04 SF Department of Environment, Task Force for Quail Recovery Plan
- 2003 SF Board of Supervisors, NAP Citizen Advisory Committee
- 2004-05 SF Recreation and Park Department, members of negotiation team to revise  
NAP plans and plan public process in preparation for approval of plan in 2006
- 2007-08 SF Mayor's Open Space Task Force

The Natural Areas Program enjoys the passionate support of many citizens, as well as equally passionate citizens who question some of the strategies and methods of the program. A comprehensive Environmental Impact Report (EIR) represents an opportunity to resolve some of the controversies that the program has generated in the past 10 years of its operation. Our comments are intended to help those who prepare the EIR to answer the many questions that have been raised about the management plan. In answering those questions, we believe it will be necessary to conduct independent studies of the potential impacts on recreation, the loss of thousands of trees, exposure to hazards such as herbicides, fire, erosion and other concerns that originate with past experience with native plant restorations in the area. Since the Initial Study has not conducted such studies or taken into consideration present conditions in the natural areas, the EIR must do so now.

You have been assigned an important task, to put to rest years of concern and disappointing experiences with the Natural Areas Program. We urge you to take this task as seriously as the public does. This is the final opportunity to do so, as we have no desire to resort to legal means (as provided by CEQA) of achieving the necessary assurance of the public's safety and enjoyment in our parks.

Sincerely,  
Karin Hu  
Mary McAllister  
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**Comment on the Notice of Preparation of an EIR for  
The Natural Areas Management Plan (SNRAMP)  
Case Number 2005.1912E  
May 21, 2009**

The Initial Study of the environmental impacts of SNRAMP is inadequate in many respects:

- It dismisses as “insignificant” environmental impacts that have been experienced in the natural areas in the past and that caused considerable damage as well as public concern.
- It makes sweeping statements, dismissing environmental and safety issues without providing any evidence to support these dismissals
- It demonstrates that the author has either not read SNRAMP or has not understood important portions of it
- It demonstrates that the author has ignored basic scientific principles needed to analyze potential impacts, such as carbon sequestration and release
- It demonstrates that the author has not visited the natural areas and is unaware of the 10-year history of environmental and safety problems and public concern since the Natural Areas Program began to operate

**The Initial Study (IS) proposes further study and analysis by an EIR of only a few environmental issues for which there “is not sufficient information available at the time on the potentially effected resources or site conditions” (IS page 61). The following comments request that the proposed EIR be expanded to include several environmental issues for which the Initial Study is inadequate, inaccurate, or is inconsistent with the reality of past actions of the Natural Areas Program both in the present and in the past 10 years of its existence.**

**E.1 Land Use and Land Use Planning  
E.9 Recreation**

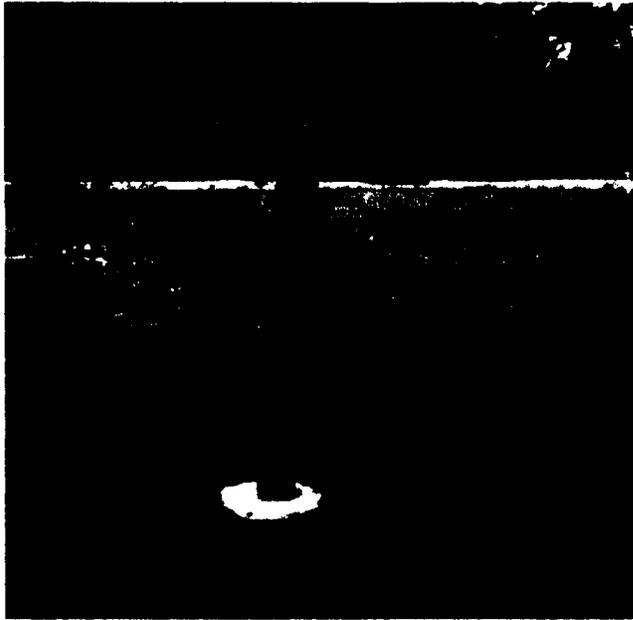
**A. Changes in land use by the Natural Areas Program**

*“There would be no change in land uses and no impact under the project...” (IS page 59)*

SNRAMP changes land use by restricting access to the natural areas:

- “Public use in all Natural Areas, unless otherwise specified, should encourage on-trail use...park signs should...include ‘Please Stay on Trails...If off-trail use continues...permanent fencing shall be considered...” (SNRAMP, Recommendation GR-11, page 5-14)
- “Recreation goals: To provide opportunities for passive recreational uses (e.g., hiking, nature observation) compatible with conservation and restoration goals.” (SNRAMP, Management Approach, page 2-2)
- “Some MA-1 areas may require installation of elevated boardwalks or permanent fences.” (SNRAMP, page 1-5)
- 10.3 miles of 40 miles of trails within the natural areas will be closed (SNRAMP, Table 3-6)

The Recreation and Park Department has recently restricted bicycles to paved roads. There are few paved paths within the natural areas, which effectively bans bicycles from the natural areas. Plans to improve trails within the natural areas will not include paving.



*Recently installed sign at the Overlook Parking lot on Mansell Street in McLaren Park*

On November 19, 2008, the following comment was posted to the Natural Areas blog: “San Francisco’s Significant Natural Resource Areas are now being assaulted by a new menace: mountain bikes... One thing needs to be perfectly clear: **Rec & Park Department policy prohibits bicycles in the parks except on PAVED surfaces...**The RPD should place signage at all entrances to all parks clearly prohibiting bike riding in any Significant Natural Resource Area.” (sfnaturalareas.org)

*“Of the San Francisco Natural Areas, trails would increase at Edgehill Mountain and Interior Greenbelt.” (IS, page 58)*

On April 27, 2009, the Natural Areas Program installed this sign at the only entrance to the Interior Greenbelt, one of the natural areas: **“No Public Access”**



The site-specific plan for the Interior Greenbelt does not indicate any trail closures in that natural area. In fact, the plan indicates the expansion of the existing trail (SNRAMP, page 6.23-2). Yet, the reality is that the Natural Areas Program is apparently closing this natural area to the public.

Both of these new signs in the natural areas cite Park Code 3.02 as the authority for these access restrictions. Park Code 3.02 provides: “Signs To Be Obeyed. No person shall willfully disobey the notices, prohibitions or directions on any sign posted by the Recreation and Park Commission of the Recreation and Park Department.” In other words, the Natural Areas Program apparently gives itself the right to put ANY prohibition on a sign and the public is obligated to observe their prohibition.

When there is a conflict between the plans as stated in SNRAMP and the reality of what is happening in the natural areas, the latter should trump the former in the EIR evaluation. The EIR must acknowledge what has actually happened and presently exists in the natural areas.

None of these restrictions on recreational access are mentioned in E.9 Recreational element of the IS. These are omissions that must be corrected by the full EIR of the Recreational element.

### **B. Everson/Digby Lots should not be included in this EIR**

The Initial Study announces the existence of a new natural area: “A portion of the Everson/Digby Lots park was recently determined to be a Natural Area” (IS, page 46). The Initial Study provides no information about this new natural area or what is planned for its future. Neither the Natural Areas Program website (sfnap.org) nor the Recreation and Park Department website (sfgov.org) acknowledge the existence of this new natural area, let alone provide any information about it. The Initial Study does not inform the reader if the Recreation and Park Commission has approved the designation of this natural area. Nor do we know if the visitors to and neighbors of this park are aware of this designation.

SNRAMP was subjected to a lengthy public process, including public meetings and hearings by the Commission that eventually resulted in its approval. Everson/Digby Lots have not been through this process and are therefore not ready for an EIR until this process is complete. A management plan must be written for this new natural area. After the public has considered this proposal and if the Commission approves it, it will be ready for environmental impact review.

### **C. Changes in land use resulting from existence/reintroduction of legally protected species**

One of the objectives of the SNRAMP is the protection, enhancement, and reintroduction of sensitive species of plants and animals: “Augmenting existing populations and (re)establishing or (re)introducing additional populations where they once occurred (or were likely to have occurred) will help to ensure their continued survival in the City” (SNRAMP, page 5-3). Management actions in the MA-1 and MA-2 areas include “reintroduction of sensitive species” (SNRAMP, page 1-5). MA-1 and MA-2 areas are 623.0 acres (58%) of all natural areas. The definition of “sensitive species” includes federal and state legally protected species (SNRAMP, Table 3-6).

Consistent with that mission, the Natural Areas Program and its volunteers have successfully lobbied the Board of Supervisors to develop Sharp Park as habitat for legally protected species to be managed by the GGNRA: “This Thursday, April 30, [2009]...you’ll have the opportunity to tell the Board of Supervisors to stop wasting our tax dollars operating the money-losing Sharp Park golf course. The Government Audit and Oversight Committee will consider legislation ‘to develop a plan, schedule and budget for restoring Sharp Park habitat for the California red-legged frog and the San Francisco garter snake in conformance with the requirements of the Endangered Species Act, and transferring Sharp Park to, or developing a joint management agree with, the Golden Gate National Recreation Area and

making environmental findings.” (sfnaturalareas.org) On May 5, 2009, the San Francisco Board of Supervisors unanimously approved this proposal verbatim as an “ordinance amending San Francisco Park Code Article 3 by adding Section 3.20...”

There are legally protected species in many other natural areas (SNRAMP Table 3-5), which could lead to similar changes in land use. For example, access restrictions will be required at Lake Merced to protect the Western Pond Turtle (WPT): “Recommendation LM-6c: To prevent native turtles from being disturbed during breeding season, restrict public access to the waters and shoreline of East lake between April 1 and August 31. It may be possible to achieve these access restrictions through signage. If not, temporary barriers that would prevent boat access to East Lakes could be installed.” (SNRAMP, Lake Merced, page 6.1-17)

In Oregon, where the WPT is an endangered species, the recovery plan for the WPT requires restrictions on all human access—recreational and agricultural—within 500 feet of the water to protect the potential nesting range of the turtle. The recovery plan also requires that the entire potential nesting range be unshaded in order to maintain the optimal temperature for the turtle’s eggs. This would require removal of all trees—native and non-native—within 500 feet of the perimeter of the East Lake and North Lakes, where the turtles have been found.

The Natural Areas Program is presently reintroducing the Mission Blue Butterfly to Twin Peaks (Oakland Tribune, 5/1/09). The Mission Blue Butterfly is a federal endangered species. The Xerxes Society lists as one of the management actions required to preserve populations of the Mission Blue, “protection from excessive recreational use.” It also suggests that suppression of fire may have reduced habitat quality and negatively affected the historic population. In other words, the reintroduction of the Mission Blue on Twin Peaks has the potential to reduce recreational access and require periodic prescribed burns. The Endangered Species Act legally obligates management actions required to maintain a legally protected species, whether it has been reintroduced artificially or occurs naturally.

In addition to access restrictions defined by SNRAMP, the Natural Areas Program has identified new restrictions on recreational uses needed to protect natural areas and their resident wildlife. Therefore, the Initial Study is inaccurate to claim that the Natural Areas Program will not change land use. SNRAMP has the potential to eliminate all forms of recreation other than walking on a designated path as it implements its goals “To maintain viable populations of all special-status species” and “To maintain and enhance native plant and animal communities.” (SNRAMP, Management Approach, page 2-1) The proposal to “transfer” or develop “joint management of” Sharp Park with the GGNRA, indicates the potential for ownership of natural areas to change in the pursuit of restoration goals. These changes in land use must be acknowledged and evaluated in the EIR. Recreational access restriction not identified by the Initial Study, must also be evaluated by the EIR.

## **E.2 Aesthetics**

### **Most trees designated for removal will NOT be replaced with native trees**

*“Generally, trees removed would be replaced with native tree species at a roughly 1:1 replacement ratio, although not necessarily at the same location. In some locations, trees would be replaced by native scrub or grassland species.” (IS page 63)*

SNRAMP contains no such commitment to replace all trees designated for removal with native trees in the same location or any other location. In most cases, SNRAMP says specifically that the trees

designated for removal will **not** be replaced by trees, but rather with grassland and dune scrub. All designated tree removals are in MA-1 and MA-2 areas (see Attachment A).

- “The long-term goal of urban forest management in MA-1 and MA-2 areas is to slowly convert those areas to native scrub, and grassland habitats or oak woodlands.” (SNRAMP, Forestry Statement, page F-1)
- “The goal in most of the MA-1 and MA-2 stands at Sharp Park is the same as for the Natural Areas within San Francisco: eventual conversion of invasive forest into grasslands and scrub.” (SNRAMP, Forestry Statement, page F-6)
- Most site-specific recommendations regarding tree removal say specifically that the trees will be replaced by scrub or grassland (SNRAMP, Forestry Statement, pages F-8-F-11):
  - Lake Merced: “These openings will remain as the forests in these areas are gradually converted to low-growing coastal scrub.”
  - Mt. Davidson: “...tree removal will result in the conversion of some areas of forest to scrub and grasslands.”
  - Glen Canyon: “...gradually converted into scrub habitat...”
  - Bayview Park: “Tree removal will focus on the existing edge of forests to preserve existing scrub and grassland.”
  - McLaren: “Grasslands will increase in magnitude and the area...will support...diverse coastal scrub.”
  - Interior Greenbelt: “...these areas will be converted to coastal scrub...”
  - Dorothy Erskine: “...scrub will fill in where trees have been removed.”

Only the site-specific Forestry Statement for Corona Heights predicts long-term conversion to oak woodland. And, “Within MA-1 and MA-2, these sites [of tree removals] would then be replanted with native shrub and grassland species. Within MA-3, urban forest species would be planted or encouraged (see Section 5, GR-15)” (SNRAMP, Forestry Statement, page F-3)

These long-term goals for the conversion of the urban forest to scrub and grassland are consistent with the natural history of San Francisco: “Prior to the colonization and the stabilization of dunes and introduction of invasive species, trees were not a dominant feature of the San Francisco peninsula. It is likely that scrubby coast live oaks grew on north-facing slopes in moist drainages and that buckeyes, bays, and oaks lined creek channels that flowed to the bay or ocean. However, much of the area probably resembled the coastal scrub habitats of San Bruno Mountain or the grassland-scrub mosaics of the Marin Headlands. Management of MA-1 and MA-2 is focused on the gradual conversion of these areas into native scrub and grassland habitats. This is the long-term goal.” (SNRAMP, Forestry Statement, page F-1)

As one might expect, given the treeless nature of the native landscape, most native plants are not adapted to shade, as there was little shade in native San Francisco. For that reason, attempts to restore the native landscape would not be served by planting native trees. Trees create shade whether they are native or non-native. A related issue also predicts that native trees will not be a conspicuous feature in the restored natural areas: “In many Natural Areas, trees capture moisture from the coastal fog. The moisture drips onto the ground creating artificially wetter than normal conditions which favor invasive weed species.” (SNRAMP, Forestry Statement, page F-1)

Because most of the natural areas are rock outcrops and sand hills that were treeless prior to the arrival of Europeans, there is little acreage within the natural areas that is capable of supporting trees that are native to San Francisco: “Two native forest series...comprise approximately 17 acres, 2 percent of total vegetation [in the natural areas]” (SNRAMP, Setting, page 3-11). Obviously, it would not be

physically possible to plant 18,500 native trees in the small areas in which they would be able to survive.

The Natural Areas Program has also demonstrated in the past that it cannot successfully replace with native trees those non-native trees that it has already removed. Nearly 10 years ago, the Natural Areas Program removed approximately 12 of the 24 non-native trees on the top of Tank Hill. The neighbors of Tank Hill were angry about their removal. The Natural Areas Program planted native trees in an attempt to satisfy the angry neighbors. These native trees did not survive, as one might expect given the windy, rocky conditions on Tank Hill to which native trees are not adapted. Alders were also planted to replace the healthy non-natives removed from the western end of Pine Lake. The Alders did not survive one year.

The Initial Study is mistaken that any commitment has been made to replace all removed trees with native trees. Nor would such a commitment be advisable, given that planting native trees in most of the natural areas would not be successful because they are adapted to sheltered areas that are not representative of the natural areas. If they were planted, they would be unlikely to survive.

Therefore, the EIR must evaluate the impact of proposed tree removal, based on the accurate premise that most will NOT be replaced.

## E.7 Air Quality

### **A. Trees designated for removal have NOT been selected because they are not healthy**

*“Trees would be removed to promote forest health and would focus on dead or dying trees, trees with disease or insect infestations, storm-damaged or hazardous trees, and trees whose growth is suppressed by overcrowding.” (IS page 87)*

This statement is also inaccurate. A generous interpretation of this misstatement of fact is that the author of the Initial Study has confused General Recommendation GR-15 with the site-specific plans for tree removals in MA-1 and MA-2 areas. General Recommendation GR-15 says, “To promote forest health, removal of trees shall focus on the removal of dead or dying trees, trees with disease or insect infestation, storm-damaged or hazardous trees, and trees that are suppressed because of overcrowding.” (SNRAMP, General Recommendations, Page 5-19) However, General Recommendation GR-15 applies **only** to non-native trees in MA-3 areas: “Urban forest stands that contain significant native plant understory and are planned for native plant and animal habitat restoration are classified as MA-1 or MA-2 and are **not considered here**. Recommendations for MA-1 and MA-2 areas are described in individual chapters in Section 6 and Appendix F [Forestry Statement] describes the species to be removed, removal methodology...and other tree removal impacts.” (SNRAMP, General Recommendations, page 5-18).

Recall that all tree removals designated by SNRAMP are within MA-1 and MA-2 areas. Recommendations for their removal described within Section 6 and the Forestry Statement do **not** state that recommendations for their removal were based on their health or lack thereof. Rather they were selected for removal if their removal would enhance or expand an adjacent native plant habitat. There is no basis upon which the Initial Study may assume that the non-native trees designated for removal are anything but healthy. Some may not be healthy, but that is not why they were selected for removal.

Removal of non-native trees within MA-3 areas are not specifically identified or quantified by SNRAMP. If they are removed, they would be incremental to the 18,500 trees that have been designated for removal. However, SNRAMP states clearly that management of MA-3 areas is a low

priority. Given the limitations on NAP resources, it is unlikely that any trees will be removed in MA-3 areas unless they fall down, as they do frequently.

## **B. SNRAMP implementation will NOT increase carbon sequestration or decrease global warming**

*“Although old large trees are good at storing carbon, they are not as effective as young trees at taking up carbon. Replacing dead, dying and diseased trees that have limited capability to sequester carbon with young saplings that have long-term carbon sequestration capabilities would result in a net GHG benefit.” (IS page 87)*

The author of the Initial Study does not provide a complete reference for this claim. A name is provided in parenthesis, but the complete citation does not appear in the list of references, so the reader is unable to verify its accuracy.

The USDA’s “Urban Forest Effects Model” includes an assessment of San Francisco’s urban forest. It reports that, “The amount of carbon annually sequestered is increased with healthier trees and larger diameter trees” (UFORE, page 8). In other words, a study by the US government specifically written for the City of San Francisco refutes the claim that young saplings have greater capabilities to sequester carbon than larger trees. Recall that the trees designated for removal by SNRAMP are not necessarily unhealthy. Clearly saplings are smaller than the mature trees over 15 feet tall that have been designated for removal.

Furthermore, the release of carbon stored in the 18,500 trees that would be removed would certainly swamp whatever benefit there may be in replacing some of the trees. Trees release their stored carbon as they decay. SNRAMP states that the trees would be left in place to slowly decay if they provide habitat or chipped, composted and used throughout the parks. In other words, all of the removed trees will release their sequestered carbon over time, as they decay in San Francisco’s parks.

Finally, the Initial Study announces (page 11) that prescribed burns will occur in the natural areas and that the SNRAMP will be “updated to reflect this change.” Fires release the stored carbon of the burned plants into the atmosphere as well as releasing particulate matter into the air. This is yet another source of increased carbon release and increased air pollution that may result from implementation of SNRAMP. Because of the accumulative effect of all the sources of carbon release predicted by the SNRAMP, the effect of prescribed burns on carbon release and air pollution must be considered by the EIR. Consideration of prescribed burns by a separate and later environmental review (as the Initial Study announces its intentions on page 11) is not acceptable.

*“Although the net effect on carbon sequestration capacity is unknown for the proposed replacement of mature eucalyptus with native saplings, replacing dying trees with healthy trees typically enhances the carbon sequestration process...As such tree replacement is expected to result in a net increase in the amount of carbon sequestered within the Natural Areas” (IS page 88)*

Even if it were true that only dying trees were being removed or that they would be replaced—and as noted above, neither is true—this statement is inaccurate. Carbon sequestration by trees and plants is directly proportional to their size (UFORE, Appendix III). Therefore, a small sapling is incapable of sequestering as much carbon as a large tree, whether it is healthy or not.

Furthermore, even if this statement were true, it does not take into account that within the MA-1 and MA-2 areas, the SNRAMP proposes to remove all seedlings and saplings (defined by SNRAMP as trees less than 15 feet tall) of non-native trees in order to convert these areas over time to scrub and

grassland (SNRAMP, Forestry Statement, page F-4). The removal of these seedlings and saplings are not quantified by SNRAMP because they are not defined by SNRAMP as trees (SNRAMP, Forestry Statement, page F-2). Therefore, their removal is incremental to the designated removal of 18,500 trees over 15 feet tall. In other words, countless small, young trees will be removed, reducing carbon sequestration in the natural areas further than can be quantified because their numbers are unknown.

Finally, the Initial Study assumes that all native trees—both those that presently exist and those that are planted in the future—will survive and continue to sequester carbon. The author of the Initial Study does not consider the potential for the death of many native trees if Sudden Oak Death continues to spread. It kills many species of tree that are native to San Francisco. It presently exists in Golden Gate Park. It is spreading throughout coastal California. The Nature Conservancy recently reported that more than one million trees have been killed by SOD in California.

*“...grassland above 50 degrees latitude reflects more sun than forest canopies, thereby keeping temperatures lower by an average of .8 degree Celsius...grassland and scrub habitat could act as a significant carbon sink.” (IS page 88)*

Once again, the author of the Initial Study does not provide a complete citation for this claim, so the reader is unable to verify its accuracy. However, this reader is familiar with this claim, which will enable a response.

Ken Caldeira of Stanford University is one of the proponents of the so-called “reflected light” argument that forests might actually increase global warming by absorbing light. Caldeira’s argument is based on the comparison between dark forests and the reflected light of snow in northern latitudes. The contrast between forest and snow is much greater than the contrast between forest and grass and scrub. It is clearly a stretch of the concept to apply it to the local climate where there is no snow.

Caldeira also makes it clear in his New York Times oped of January 2007 that he is not advocating for the destruction of forests: “Clear-cutting mountains to slow climate change is, of course, nuts...preserving and restoring forests is a valuable activity, regardless of its impact on climate—we need more trees, not fewer.”

The Initial Study makes an illogical connection between increased temperature on the forest floor resulting from the absorption of light and the ability of the forest to sequester carbon. There is no such connection. Increased temperature on the forest floor does not reduce the carbon sequestering abilities of the forest that are a by-product of photosynthesis.

The USDA’s “Urban Forest Effects Model” for the city of San Francisco also reports that the “tree cover” is less than 12% of the city’s land. Yet, “Trees remove about 19 percent more air pollution than shrubs in San Francisco” (UFORE, page 7). This finding refutes the claim that converting many acres of trees into grassland will benefit air quality in San Francisco.

Furthermore, even if this argument can be applied to the local situation, it assumes that the native plant populations will survive in the long-term. The author of the Initial Study does not acknowledge that the ranges of native plant populations are changing in response to global warming: “Two-thirds of California’s unique plants, some 2,300 species that grow nowhere else in the world, could be wiped out across much of their current geographic ranges by the end of the century because of rising temperatures and changing rainfall patterns according to a new study...California oaks could disappear from Central California in favor of cooler weather in the Klamath Mountains...” (Los Angeles Times, June 25, 2008)

Other researchers find that invasive weeds are frequently better adapted to conditions that are altered by man. For example, CO2 levels are higher in urban settings and promote the growth of invasive weeds that thrive in higher concentrations of CO2. Fire suppression is another means of promoting weed growth at the expense of native plant populations. “New research...suggests that invasive species, at least in some instances, aren’t so much the causes of environmental degradation as eco-opportunists taking advantage of disturbed habitats.” (“Can Weeds Help Solve the Climate Crisis,” New York Times, June 29, 2008) In other words, simply removing invasive species does not necessarily enable the survival of native plants if they are no longer adapted to the conditions that have been altered by man.

These studies would explain the singular lack of success of the “restorations” of the Natural Areas Program for the past 10 years. Many natural areas have been planted repeatedly, only to fail repeatedly. It may not be possible to reestablish native plant populations in an urban setting that has been significantly altered by hundreds of years of human habitation.

If non-native plants and trees are removed from 25% of all park acreage in San Francisco (the size of the natural areas in SF) and it proves impossible to successfully grow native plants in those locations, there will clearly be no carbon sequestration benefit from these efforts.

Since the Initial Study has made mistaken assumptions in evaluating the impact of proposed tree removal and has not considered the question of whether or not a “restored” landscape will survive, the EIR must now fully analyze these issues. Since the author of the Initial Study has demonstrated a stunning lack of scientific knowledge regarding carbon sequestration, air quality, and global warming, a consultant with the necessary expertise must conduct the EIR.

## **E.8 Wind and Shadow**

### **Tree removal HAS altered wind conditions in the natural areas resulting in windthrow hazard**

*“...removals within the Natural Areas are planned to take individuals or very small groups of trees within existing forest and scrub habitats to avoid altering the wind conditions. As such tree removal would not include wind-toughened edge trees and would not result in increased wind hazards or expose trees within a stand to high winds. Therefore, the potential wind hazard of windthrow that would result from the project is expected to be less than significant. (IS page 90)*

It is patently false that tree removals “are planned to take individuals or very small groups of trees within existing forest and scrub habitats to avoid altering the wind conditions.” Here are a few examples of the large number of trees that will be removed from small areas (SNRAMP, Forestry Statement, Appendix F-14-F-17):

- Mt. Davidson: 1,000 trees will be removed from MA-1c (3.5 acres)
- Glen Canyon: 100 trees will be removed from MA-2e (.6 acres)
- Sharp Park: 1,476 trees will be removed from MA-2j (5.6 acres)
- Corona Heights: 10 trees will be removed from MA2C (less than .01 acre)
- Bayview Park: 140 trees will be removed from MA-1d (.02 acres)
- McLaren Park: 600 trees will be removed from MA-2b (9.9 acres)
- Interior Greenbelt: 100 trees will be removed from MA-2a (1 acre)

Tree removal on this scale cannot be done piecemeal, taking only a few individual trees on separate occasions. The game of “pick-up-sticks” is a good metaphor to understand the problem. Felling one

tree will impact those in close proximity. Whether intended or not, neighboring trees are likely to be felled by the falling tree.

Removing that individual tree will not be possible unless its neighbors are also removed. One can't pick up that felled tree when other standing trees surround it. Felled trees must be dragged out. As a qualified arborist said, when expressing his opinion of the proposed selective method of tree removal, "I don't have tweezers to pick these trees out of the forest."

Leaving the felled trees on the ground until they are all destroyed is not an option because the restoration objective is to plant the bared ground with native plants, which can't be accomplished if the ground is covered with dead trees.

Even if it were true that only "very small groups of trees" will be removed, it does not follow that "tree removal would not include wind-toughened edge trees" nor that removals "would not result in increased wind hazards or expose trees...to high winds." In fact, most of the tree removals will occur on the edge of the existing forest, which is consistent with the stated goal of the removals to expand the adjacent native scrub and grassland (SNRAMP, Forestry Statement, pages F-8-F-11):

- Mt. Davidson: "Additional removals will occur...on the eastern edge of the forest."
- Bayview Park: "Tree removal will focus on the existing edge of forests..."
- McLaren Park: "...removal will occur along forest edges..."
- Interior Greenbelt: "Tree removal will focus on the eastern border and the western tip of this Natural Area..."

In addition to these narrative descriptions of the location of tree removals, SNRAMP contains detailed maps of the natural areas in Section 6 that indicate the location of the tree removals. These maps reveal the vulnerability of the remaining trees as a consequence of some of the tree removals.

We will use Lake Merced only as an example, although identical logic could be applied to many other natural areas in which large tree removals are planned. Over 100 trees will be removed from the eastern shore of the South Lake. The Harding Park Golf Course is adjacent to this shore, to the east of the lake. The wind blows from the west. The golf course is presently sheltered from the wind by the trees that will be destroyed on the eastern shore of the lake. There is an old population of huge Cypress trees on the golf course that are nearing the end of their life span of about 100 years. These trees will be exposed to wind from which they were previously sheltered. Massive tree failure could result. One hopes it will not occur during a PGA TOUR golf tournament when there are thousands of spectators on the course.

The City of San Francisco has contracted with PGA TOUR, Inc, "for certain golf tournaments at Harding Park over the 15 year period beginning 1/1/05." The contract requires strict course maintenance standards be met as an obligation to hold any tournaments at this facility. The EIR should indicate that the PGA TOUR has been informed of the tree removal adjacent to the golf course and that the management actions in SNRAMP will not violate the terms of the contract between PGA TOUR and the City.



*The eastern shore of the South Lake at Lake Merced. The western edge of Harding Golf Course.*

San Franciscans have had a preview of the tree failure that could be precipitated by the removal of thousands of trees in the natural areas. Pine Lake and Stern Grove Parks are contiguous parks that essentially form one park of approximately 70 acres. It has been undergoing extensive capital improvement, beginning in 2000. There is a natural area at the western end of the park, including and surrounding Pine Lake. The wind enters this park from the western end. The entire park is a narrow, upwardly sloping canyon that funnels and accelerates the wind as it travels from the western to the eastern end of the park.

In 2003, in connection with the capital project, a survey of all trees in Pine Lake/Stern Grove was conducted by a certified arborist, resulting in a Tree Management Plan identifying hundreds of hazardous trees recommended for removal.

In early 2004 approximately 20 healthy non-native trees were removed from the western end of the park to accommodate the expansion of a native plant garden that requires full sun. This removal was documented and acknowledged by RPD at an RPD Commission hearing on 5/5/2004. A few Alders were planted to replace the trees that were removed. The Alders did not survive.

The concert meadow renovation in Stern Grove was the first phase of the capital project. In connection with that project, many trees were removed to accommodate that renovation. Some had been identified by the arborist's report as hazardous. Most had not. Funding was not sufficient to remove all of the 363 hazardous trees in Stern Grove recommended for immediate "priority removal" in 2003. Most hazardous trees in Stern Grove were left in place while many healthy trees were removed to accommodate renovation of the concert meadow.

Pine Lake was the second phase of the project. In 2007 hundreds of trees—of which most were considered hazardous--were removed during the Pine Lake Project. Recall that Pine Lake is west of Stern Grove, the windward side of Stern Grove. The removal of hundreds of trees from Pine Lake exposed Stern Grove to wind from which it had previously been sheltered. Recall that hundreds of the trees remaining in Stern Grove had been deemed hazardous in 2003. Shortly after removal of hundreds of trees in Pine Lake Park trees began to fail throughout the park at an alarming rate.

On April 14, 2008, a park visitor to Stern Grove was killed by a Redwood branch about 20 feet long that fell on her and her car, destroying her car (SF Examiner, 4/30/08). The Tree Management Report of 2003 had specifically identified this branch as potentially hazardous. The Redwood tree had been topped in the past, creating an unsupported “horizontal branch with poor taper and weight” (Tree Management Report). The branch extended over a heavily used parking lot, in which the park visitor was killed. Her family has sued the City of San Francisco for the negligence that caused her death because the dangerous branch had been identified 5 years earlier and hundreds of trees to its windward side had been removed, making the branch even more vulnerable to failure (SF Examiner, 9/24/08).

About two weeks earlier, an equally large branch fell onto the road that leads to the same parking lot. Park visitors were trapped in the parking lot. They called RPD, using their cell phones, but no one came to their rescue. They finally freed themselves by dragging the branch out of the road, using a rope and a truck of one of the visitors. These visitors notified RPD of this incident and recorded the incident in a weblog created for park visitors. This was the wake-up call that could have prevented the death on April 14, 2008.

Since then there have been approximately seven major tree failures in Pine Lake/Stern Grove.





*Two of the tree failures in Stern Grove/Pine Lake in the past year.*

SNRAMP mentions the removal of hazardous trees at Pine Lake, noting that these removals have not been quantified by SNRAMP (Forestry Statement, page F-2). The author of the Initial Study was therefore alerted to this opportunity to evaluate the potential for dangerous windthrow subsequent to large tree removals. The Initial Study makes no mention of Pine Lake tree removals, nor the consequences of those removals.

Given this experience with large tree removals in natural areas, the conclusion of the Initial Study that, *“Therefore, the potential wind hazard of windthrow that would result from the project is expected to be less than significant”* is irresponsible and potentially tragic. There is no basis upon which the Initial Study can dismiss the potential for significant tree failure in this cavalier manner.

SNRAMP makes similar efforts to dismiss the potential for windthrow in the Forestry Statement (page F-11-F-13). It states repeatedly, “potential windthrow hazard to people is minimal because there are no residential areas near the stands where tree removals will occur.” In other words, SNRAMP’s sole concern is for property, not for the people visiting the parks. Some of these parks are heavily used by people. The golf course at Lake Merced and the concert meadow in Stern Grove both have thousands of people in them during special events.

Of all the many issues in this Initial Study, this refusal to consider the seriousness of tree failure and consequent danger to the public is perhaps the most egregious. After a park visitor paid with her life for this failure to mitigate the consequences of massive tree removal, RPD appears to have learned nothing from this needless loss. The EIR must evaluate the potential for windthrow resulting from the removal of 18,500 trees. This evaluation must be done by a qualified consultant with expertise in forestry management.

## **E.10 Utilities and Service Systems**

### **Native plant restoration WILL require new irrigation and water use**

*“Reinstating native species and replacing trees would require irrigation until they become established. However, irrigation needs would be met by existing water supply capacity and would not require new or expanded water supply resources. Therefore, impacts on water supply would be less than significant. (IS page 94)*

Natural areas have been established in previously undeveloped portions of the park. It is simply not true that these areas were irrigated prior to being planted with native vegetation. The naturalized, non-native vegetation does not require irrigation. Any irrigation in natural areas is new and incremental.

An adequate Initial Study would evaluate how much water over what period of time will be required to irrigate native plants and trees until they are established. It is typical of this Initial Study that no attempt is made to evaluate that need. It merely dismisses potential impacts on water supply as “less than significant” and eliminates this question from further study in the subsequent Environmental Impact Report, as it does with virtually every controversial issue. The EIR must now include the analysis of additional water use not provided by the Initial Study.

## **E.12 Biological Resources**

### **A. Impact on wildlife of herbicide use by Natural Areas Program must be evaluated**

*“...certain actions could disturb these (wildlife) species...” (ID page 109)*

The potential for management actions of the Natural Areas Program to impact wildlife is one of the few controversial issues that the Initial Study proposes to study further in the Environmental Impact Report. The impact of herbicide use in the natural areas on wildlife must be considered in that EIR. Herbicide use by the Natural Areas Program is not even mentioned by the Initial Study.

SNRAMP reports its use of “chemical control” as one of its “management methods:” “chemical control, which involves the use of herbicides to suppress wildland weeds” and “...herbicides are used to control invasive weeds in Natural Areas.” (SNRAMP, Integrated Pest Management, page 4-4). However, it downplays the significance of that usage: “on a per-acre basis pesticide usage in the Natural Areas is significantly less than usage rates in other park maintenance programs.” (page 4-5)

This apology is ineffective for two reasons:

- The natural areas are, by definition, undeveloped areas of the park. Clearly developed areas of the park, such as lawns and landscaped areas, make greater demands for pest and weed control. Any herbicide use in previously undeveloped areas of the park is new to these areas, which prior to the establishment of the Natural Areas Program, were left untended.
- The removal of thousands of eucalyptus trees will require application of herbicides such as Garlon and Round-Up to prevent resprouting of the trees: “Tree stumps of some exotic species may be treated (hand painted or sprayed) with herbicide to prevent re-growth.” (SNRAMP, Forestry Statement, page F-4) This will substantially increase the use of herbicides by the Natural Areas Program as the SNRAMP is implemented.

The affect of many herbicides (including the active ingredients in Garlon and Round-up) on declining amphibian populations is well known and documented in the literature (e.g., Tyrone Hayes, UC Berkeley). In fact, the Center for Biological Diversity sued the US Department of Fish and Wildlife regarding the use of these chemicals in the proximity of populations of the legally protected, endangered red-legged frog (“EPA to limit use of 66 pesticides,” SF Chronicle, 10/20/06). In response, Fish and Wildlife has prohibited their use within a certain distance of these animals. Based on research, these chemicals are equally likely to be harmful to other amphibians such as salamanders and newts that are ubiquitous in the natural areas.

The Environmental Impact Review must evaluate the impact on wildlife of herbicide use in the natural areas on wildlife.

## **B. The potential impact of West Nile Virus must be evaluated**

The planned expansion of wetlands at Sharp Park to support the red-legged frog may increase the mosquito population, and the potential for West Nile Virus (WNV). This raises several questions that should be addressed by the EIR. Will spraying of pesticides to control the mosquito population be prohibited to protect the red-legged frog population? If so, is there potential for an increased mosquito population to spread WNV to birds and humans? These questions should be analyzed and evaluated by the EIR.

## **C. Do tree removals at Sharp Park violate the Pacifica logging ordinance?**

*“...Significant Trees Ordinance of San Mateo County and Ordinance 636-CS, which limits logging within Pacifica and applies to tree removal at Sharp Park. Management actions would not conflict with these or other applicable ordinances. (IS page 109)*

The meaning of this statement is not clear. The first sentence seems to say that the Pacifica ordinance that limits logging, applies to the removal of 15,000 trees designated by SNRAMP. The second sentence seems to say “management actions” (that is, the removal of 15,000 trees at Sharp Park) do **not** violate this ordinance. This is an unsubstantiated claim that requires explanation. The ordinance requires permits for removing more than 20 trees per year. At that rate the removal of 15,000 trees would take 750 years. Has a permit been obtained, as required by this ordinance, to remove more than 20 trees per year? The reader deserves some explanation for how the requirements of this ordinance have been satisfied, IF they have been satisfied.

## **D. Conflict with the General Plan**

*“Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? No Impact” (IS, page 87)*

Tree removals designated in SNRAMP are in conflict with Policy 2.9 of the General Plan to “maintain and expand the urban forest.” As we have noted earlier, 18,500 trees will be removed in the natural areas. Most will not be replaced. Most are presumed to be healthy, mature trees. In addition, countless trees less than 15 feet tall will also be destroyed to prevent the regeneration of the urban forest. The EIR must acknowledge this conflict.

## **E.13. Geology and Soils**

### **Potential for further erosion problems requires further study**

*“The overall scale of the proposed project is relatively small, and while these activities may result in some increased erosion and loss of topsoil in the Natural Areas, these impacts are generally considered less than significant...This topic will not be discussed in the Environmental Impact Review.” (IS page 112)*

Once again, the Initial Study dismisses a serious, controversial issue with a cavalier wave of its invisible hand. The removal of non-native plants has caused erosion in many natural areas, and the increased removal of non-native trees and vegetation prescribed by SNRAMP is likely to exacerbate the situation.

Many of the natural areas are on sandy hills that are surrounded by residential housing. As these residential neighborhoods were developed, the sand was stabilized with non-native vegetation, such as ice plant. When the Natural Areas Program began removing the ice plant from these sandy hills, the destabilized sand inundated the surrounding neighborhoods.

On July 26, 2006, Jeff Eng, President of the Golden Gate Heights Neighborhood Association testified to the Recreation and Park Commission regarding the adoption of SNRAMP (Attachment B). One of the concerns he expressed on behalf of his association was, "That the NAP continue to protect the remnants of native vegetation without damaging surrounding private properties, for example, causing erosion and resulting blowing sand."

NAP has repeatedly denied that the removal of ice plant has destabilized sand in Golden Gate Heights. I have heard them claim in public hearings that ice plant is actually less capable of stabilizing sand than the plants that are native to the sand dunes. However, the reality of the experience of the neighbors of natural areas in Golden Gate Heights contradicts this claim. An adequate Initial Study would evaluate this concern and respond to it in a meaningful way, rather than merely wave it away, as it attempts to do.

There are also several natural areas that have experienced serious erosion in the past, although I will focus only on Lake Merced in my comments. During a heavy rain year (2004), the eastern and southern shores of the Impound Lake (one of the lakes of Lake Merced) collapsed, undermining paved trails and roads. This is just one of several areas on the shore of all four lakes of which Lake Merced is composed that have collapsed into the lake in the past.



*East shore of Impound Lake at Lake Merced*

The planned removal of all trees on the steep, sandy eastern shore of South Lake has the potential to precipitate a massive collapse of that shore. The trees on that shore now help to stabilize the shore. The roots of trees are responsible for holding soil in place, particularly on steep slopes. As the roots decay slowly over time, their ability to hold the soil in place slowly declines. Certified Arborist, Ray Moritz, explained the process in the context of a question about the clear-cutting of bay laurels on a steep slope: "If the stumps have been killed with an herbicide, the root matrix, and its contribution to soil cohesion will only persist for approximately five years, generally diminishing over that period. So, in that case, you have only a short time to get another soil binder established." (Ray Moritz, SF

Chronicle, 7/5/08) In a personal email communication he confirmed that the same considerations apply to eucalyptus.

Recall that the eastern shore of South Lake is the western boundary of the Harding golf course. The collapse of that shore has the potential to undermine the western side of the golf course.

The removal of 18,500 non-native trees from the natural areas has the potential to cause significant erosion in many natural areas. SNRAMP proposes the use of “wood mulch, fiber rolls, and silt fences to minimize erosion.” These strategies have not been successful in preventing erosion in the past. An adequate Initial Study would either analyze this potential or recommend that it be included in the Environmental Impact Review. It does neither. The EIR must now study past erosion sites in the natural areas and evaluate the SNRAMP for its potential to cause further erosion in the future.

#### **E.14 Hydrology and Water Quality**

##### **Potential for drainage problems requires further study**

*There are no activities included in the proposed project which would significantly alter the existing drainage pattern of the sites, or substantially increase runoff such that flooding occurs.” (IS page 122)*

It seems very unlikely that 15,000 trees can be removed from a steep canyon wall in Sharp Park without “significantly altering the existing drainage pattern.” Water and sediment will drain down from this canyon into the water features on the western side of Sharp Park, where endangered species make their home.

The eucalyptus tree is notorious for its ability to absorb water. It was used early in the development of Australian agriculture to drain swamps and wetlands. Ray Moritz, Certified Arborist, says of the eucalyptus and the role it plays in erosion and drainage, “Trees, particularly Eucalyptus trees, reduce erosion in several ways. Eucalypts not only help hold the soil in place with their roots, sheltering canopies and deep ground litter, they are tremendous water pumpers. So much so that they were used throughout the world to dry out wet areas for malaria control, and got one of their mid-1800’s nicknames, “the fever tree.” [If Eucalypts are removed] the replacement plants [must be] well-established within five years.” (private communication)

The removal of 18,500 non-native trees from the natural areas has the potential to significantly change drainage patterns in many natural areas because many are steep hills and canyons. An adequate Initial Study would either analyze this potential or recommend that it be included in the Environmental Impact Review. It does neither. The EIR must evaluate the impact of tree removals on existing drainage patterns in ALL natural areas. .

#### **E.15 Hazards and Hazardous Materials**

*“Management of the Natural Areas would include removing trees, including those that are diseased and dying, thereby reducing easily combustible fuel loads. Also implementing recommendation GR-13a should reduce the presence of vegetation with high fire hazard ratings, such as dense and aging French broom and eucalyptus.” (IS, page 129)*

As previously noted in this comment, the 18,500 trees that have been designated for removal are not necessarily “diseased and dying.” They have been selected for removal insofar as they enhance and expand native plant populations.

Secondly, the restored landscape of native grassland and dune scrub is not less flammable than the non-native that will be removed. Here are comparison data from the Hills Emergency Forum, which is a group of East Bay agencies and organizations such as UC, EBRPD, and EBMUD.

Flame lengths: the distance from the average flame tip to the middle of the burning zone at the base of the fire.

<u>Type of Vegetation</u>	<u>Flame Length</u>
Grassland	12 to 38 feet
Brush and Scrub	14 to 69 feet
Hardwoods forest (e.g., Oak)	1 to 34 feet
Monterey pine forest	2 to 7 feet
Eucalyptus forest	6 to 21 feet

Whether a plant or tree is native or non-native has nothing to do with how easily it ignites or how readily it will be burn. Here are a few quotes from experts about the flammability of grasslands and scrub:

“The more critical concern for this vegetation type [grassland] is the rate at which grassland fires can spread and the ease of ignition. This is one of the most dangerous types of fires for fire fighter safety due to its rapid frontal speed.” (Management Recommendations of Hills Emergency Forum)

“Shrublands with their enhanced fuel loads produce more intense fires that are more difficult to suppress and result in somewhat larger fires.” (“Fire History of the San Francisco East Bay Region and Implications for Landscape Patterns” (John E. Keeley, USGS)

It is a popular myth that eucalyptus is more flammable than other trees and native landscapes. Here are a few quotes from experts about that myth:

“...many trees are highly fireproof, like redwoods and eucalypts...” (The Tree: A Natural History of What Trees Are, Colin Trudge)

“Fire fuels (those with a diameter of ¼ inch or less) and not tree trunks are what contribute to the intensity of wildfire...the university [UC] has not reduced but compounded its wildfire danger problem in the UC hill area by replacing groves of eucalyptus trees with grassland.” (Evaluation of Fire Management Plan for UC hill area by Alexander Kerr)

SNRAMP also acknowledges the important role that fire plays in the native landscape: “...fires may help native species germinate...” (SNRAMP, page 5-4). For this reason (and also to help control non-native vegetation) SNRAMP includes fires as a possible management action in Recommendation GR-3b (page 5-4).

The Initial Study announces the intention to use prescribed fires to manage the natural areas: “SNRAMP no longer is proposing prescribed burning would not occur. The SNRAMP will be updated to reflect this change.” (IS, page 11) However, the Initial Study has not considered the potential hazard of employing fire as a management tool: “Should the SFRPD determine prescribed burning to be a desirable, feasible method for managing native grasslands, a separate environmental review would be required to comply with CEQA...” In other words, this Initial Study does not include the potential environmental impacts of prescribed burns.

Restoration efforts on San Bruno Mountain provide a test case for the use of prescribed burns to support restoration efforts. San Bruno Mountain has been undergoing extensive restoration efforts for many years. The focus of those efforts has been to increase the population of the Mission Blue Butterfly. As noted earlier in this comment, the San Francisco Natural Areas Program is reintroducing the Mission Blue to Twin Peaks. In 2003, a prescribed burn on San Bruno Mountain raged out of control, nearly destroying the adjacent residential neighborhoods:

“The fire was lit Tuesday morning by the California Department of Forestry to burn off dry vegetation and restore natural habitat in San Bruno Mountain State Park...The blaze, fed by 25 mph afternoon winds, spread rapidly out of control, jumping across Guadalupe Canyon Parkway and moving southeast toward a couple of hundred homes along the mountain’s eastern approach. At one point, it crossed a steep ravine and threatened the Mission Blue Drive neighborhood, where firefighters stopped the flames just spitting distance from some homes and condominiums under construction...state firefighters called for mutual aid and received dozens of reinforcements from fire departments, including Daly City, San Bruno, Brisbane, Burlingame and South San Francisco...The fire was supposed to be contained within three to five acres in the Wax Myrtle Ravine area, but it spread to about 50 acres before it was contained...said CDF Capt. Claire Frank.” (San Francisco Chronicle, July 9, 2003)

In other words, the track record for the use of prescribed burns to support restoration efforts indicates that they can burn out of control. Therefore, fire hazards and the use of prescribed burns must be analyzed by this EIR. It cannot be delayed to a later date because it is inextricably related to other issues, such as air pollution and increased carbon release, contribution to global warming.

### **In Conclusion**

The Initial Study has failed to meet the most minimal standards of CEQA. All environmental issues should be included in the Environmental Impact Review, including those not identified by the Initial Study.

There are many important environmental issues that are not mentioned in the Initial Study that must be acknowledged and analyzed:

- The increased use of herbicides required to prevent resprouting of vegetation and trees that are removed and the potential impact of that use on wildlife
- The prohibition against bicycles on unpaved trails in the natural areas
- The intention to close the golf course at Sharp Park to benefit endangered species and the potential for similar closures in other natural areas in San Francisco
- The fact that scientists have recently determined that the ranges of native plants have moved and will continue to move in response to climate change. The Environmental Impact Review must answer these questions to the public’s satisfaction: “Is it still possible to sustain in San Francisco the same plants that were native to this area over 200 years ago?” and “Have the changes in air, soil and other conditions in San Francisco changed to the extent that they no longer support the plants that were native to this area over 200 years ago?”
- The EIR must acknowledge the existence of Sudden Oak Death and assess its potential to kill native trees in the natural areas.
- The EIR must acknowledge plans for prescribed burns and evaluate their impact on carbon release, air pollution, and fire hazards.

ATTACHMENT A

Tree Removals Designated by SNRAMP(over 15 feet tall)

Park	MA-1	MA-2	Total	
San Francisco				
Lake Merced	29	105	134	some trees already girdled
Mt. Davidson	1200	400	1600	about 50 trees already girdled
Glen Canyon	20	100	120	25 trees already destroyed
Grandview		5	5	
Rock Outcrop			0	
GG Hts			0	
Hawk Hill			0	
Brooks			0	
Pine Lake			0	many trees already destroyed
Twin Peaks		3	3	
Billy Goat			0	
Buena Vista		10	10	
Corona Hts	1	14	15	
Duncan-Castro			0	
Kite Hill			0	
Tank Hill			0	about 12 trees already destroyed
GG Park	32	50	82	
15th Ave Steps			0	
Bayview	355	156	511	hundreds of trees already destroyed or girdled
India Basin			0	
McLaren	135	670	805	
Palou Phelps		2	2	
Balboa			0	
Interior Greenbelt		140	140	
Erskine	5	9	14	
Edgehill			0	
Fairmont			0	
Total	1777	1664	3441	
Percent	51.64%	48.36%		
Pacifica				
Sharp Park	50	14950	15000	

## Attachment B

### Special Hearing on Management Plan for Natural Areas Program

Recreation and Park Commission Wednesday, July 26, 2006

8:30 am

Room 416, City Hall

The Recreation and Park Commission will decide on Wednesday, July 26, whether to accept the Management Plan drafted by the Natural Areas Program (NAP). NAP originated out of concerns about protecting remnants of plants and wildlife that were native to the San Francisco peninsula and whose numbers were dwindling. The program, however, expanded to take as a main mission the re-creation of what San Francisco looked like before "white men" came and altered the landscape by planting non-native plants. In our neighborhood, the San Francisco that existed several hundred years ago was a windy, largely treeless areas with dunes of drifting sand, with areas of "dune scrub."

NAP claims nearly one-third of all city-managed parklands as "natural areas," although the term "native areas" is really more accurate. NAP park areas are currently quite "natural," filled with plants and trees, most of which are not native to the San Francisco peninsula. NAP wants to remove many non-native trees and plants (and animals) from these areas, and replace them with dune scrub vegetation (in our neighborhood).

NAP has claimed all of Grandview Park, the Rock Outcrop (14th and Ortega), and Hawk Hill (hillside above Hoover Middle School). They have claimed an area along the western end of Golden Gate Heights Park (above 14th Ave). The Management Plan calls for areas of "scattered, open sand" in all four parks within or adjacent to the Golden Gate Heights neighborhood. NAP plans to remove all iceplant and other non-natives that had been planted on the steep slopes of these parks to stabilize the sand and keep it from drifting and blowing. Even with the iceplant, drifting sand frequently blocks 14th Ave near the Rock Outcrop, clogs sewers, and impacts neighboring property. Property owners adjacent to these parks have told us of hard-fought battles over the years to find the right mix of plants to keep the sand in place, and of their concerns that NAP plans to remove those non-native plants could destabilize the hills, with the potential for damage to their property.

The Management Plan also calls for the removal of 3,400 healthy, non-native trees in San Francisco city parks (and an additional 15,000 trees in Sharp Park in Pacifica). The total number of trees slated for destruction is actually higher because the Management Plan defines a tree as being over 15 feet tall, and therefore doesn't include any young trees that will be removed. These trees were planted, in many cases, to provide needed windbreaks and help stabilize areas, and their loss will increase erosion and wind problems in the parks and in the surrounding neighborhoods.

The Golden Gate Heights Neighborhood Association has asked the Recreation and Park Commission to revise the NAP Management Plan to better reflect the needs of San Francisco neighborhoods. Note that the GGNHA is not calling for the end of the NAP program. We just want changes to accommodate the following concerns:

- 1) That the NAP continue to protect the remnants of native vegetation without damaging surrounding private properties, for example, causing erosion and the resulting blowing sand, and
- 2) That the proposed plans for the natural areas in San Francisco be revised so that the urban forest is maintained and increased and is not sacrificed to facilitate the introduction of native plants, and
- 3) That the Recreation and Park Department be responsible for developing the natural areas in a manner that is consistent with the health and safety, as well as the recreational and aesthetic preferences, of the citizens of San Francisco, and
- 4) That the cost of implementing a management plan for the natural areas not be at the expense of other responsibilities of the Recreation and Park Department to provide recreational programs and clean, well-maintained facilities and parks for the people of San Francisco.

GGHNA encourages all of its members to let the Recreation and Park Commission know what you think about the Management Plan for the Natural Areas Program (to see the plan, go to: [http://www.parks.sfgov.org/site/recpark\\_index.asp?id=1896](http://www.parks.sfgov.org/site/recpark_index.asp?id=1896) ).

If possible, try to attend the Wednesday meeting and tell them of your concerns about the program's impact on our neighborhood.

Or write the Commission at:

Rec and Park Commission President **Gloria Bonilla** at: [gloria.bonilla@sfgov.org](mailto:gloria.bonilla@sfgov.org)  
Commission Vice-President **Lawrence Martin** at: [lawrence.martin@sfgov.org](mailto:lawrence.martin@sfgov.org)  
The Natural Areas Program Manager, **Lisa Wayne** at: [Lisa.Wayne@sfgov.org](mailto:Lisa.Wayne@sfgov.org)

or send snail mail to the  
Recreation and Park Commission  
501 Stanyan Street, San Francisco, CA 94117.

Thank you,

Jeff Eng

President, Golden Gate Heights Neighborhood Association

NANCY WUERFEL, 2516 23<sup>RD</sup> AVENUE, SAN FRANCISCO, CA 94116

May 21, 2009

TO: Mr. Bill Wycko  
FROM: Nancy Wuerfel   
RE: Notice of Preparation of an Environmental Impact Report  
Natural Areas Management Plan, Case # 2005.1912E

RECEIVED

MAY 21 2009

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
RECEPTION DESK

The project that is the subject of this Initial study is not in compliance with the approved resolutions from the Recreation and Park Commission (Commission).

1. The following resolutions have not been recognized or implemented in the Natural Areas Management Plan:

**At the Special Meeting of the Recreation and Park Commission held on July 26 and continued on August 21, 2006, the Commission unanimously voted to approve Resolution Number 0608-012 as follows:**

***RESOLVED, That this Commission does approve the Natural Resources Management Plan as amended as the proposed project to be considered under the California Environmental Quality Act (CEQA).***

Prior to the vote on Resolution Number 0608-012 two amendments were passed by the Commission to the Natural Resources Management Plan. Those amendments were:

- ***The MA3 areas shall be maintained by parks and squares and urban forestry Departments and may be reforested with native or non-native species. Weed and brush removal and erosion control in MA3 areas shall be undertaken in accordance with the Natural Areas Plan.***
- ***That where appropriate in the plan that feral cat relocation shall be implemented only upon a determination by the Commission that other methods of population reduction failed to adequately reduce cat populations in natural areas.***

The Commission also voted unanimously to approve Resolution Number 0608-013 as follows:

***RESOLVED, That this Commission does approve the Request for Proposals for consultant services to perform the necessary environmental analyses pursuant to the***

**California Environmental Quality Act on the Final Draft Significant Natural Resources Areas Management Plan as amended by Resolution Number 0608-012.**

The staff have not done due diligence to determine that the project, submitted for environmental review, was the project approved by the Commission that includes the amendments as noted above. This violates the CEQA requirement for the project to comply with the San Francisco City Charter. Sections 4.102 and 4.113, of the Charter authorize the Recreation and Park Commission to approve plans and set policies for the Recreation and Park Department.

In your cover letter, you referred to the Commission's approval in 1995 of the original management plan, but you do not mention the Commission action that brought this project to the attention of your department for CEQA review. All resolutions by the Commission referable to this project should be cited, complied with, and included as reference documents.

The amended project requires changes in the draft Management Plan of 2006 that have not been made or evaluated by the consultants, since the amendments were never acknowledged. Before the scoping for the EIR is completed, the Management Plan itself must be amended according to the Commission's resolution.

The following issues must be acknowledged in the revised Management Plan and any environmental impacts evaluated in the EIR:

- that the MA 1, MA 2, and MA 3 zones are an integral part of the project
- that the maintenance of the MA 3 zone, 43% of the natural areas, is not the responsibility of the Natural Areas Program
- that GR 15 governs the activities in the MA- 3 zone
- that GR-7 referencing feral cat control must now include the Commission's amendment.

2. The following resolution has not been referenced in the Initial Study.

**At the Regular Meeting of the Recreation and Park Commission on October 4, 2007, the Commission unanimously voted to approve Resolution Number 0710-011**

***RESOLVED, That this Commission: 1) accepts the recommendation of staff and the general manager and does approve the award of a professional contract in the amount of \$800,000 to Tetra Tech for the environmental analysis in support of the Draft Significant Natural Resource Areas Management Plan and to satisfy the requirements of CEQA guidelines, NEPA, and City, State and Federal regulations and 2) requests the a full EIR be conducted for the Natural Areas Plan and all 31 Natural Areas sites be analyzed.***

From reading the Initial Study, it is not clear to me that "all 31 natural areas sites" were analyzed as specified. There has been no quantification of the environmental effects to be experienced at each of the 31 natural areas sites as a result of the implementation of the

Management Plan. There is no evaluation of the cumulative effects on each natural area site of the proposed project. I believe it is incumbent on the Planning Department to ensure the Commission's request is complied with.

3. The Initial Study failed to discuss, in Sections C.1 and C.2 of the report, the CEQA requirement concerning "approvals and permits from City departments other than the Planning Dept..." . Specifically, the Administrative Code CHAPTER 63: LIMITATIONS ON WATER USE FOR LANDSCAPING IN NEW DEVELOPMENTS AND LANDSCAPING RENOVATIONS was not acknowledged or discussed.

Chapter 63 requires a report, plan and approval from the SFPUC for "landscaping renovation" defined as "renovations of landscaping larger than 1,000 square feet involving the installation of a new irrigation water meter to serve landscaping that has not been served by the San Francisco Water Department in the previous five years." Page 94 of the Initial Study states "Reintroducing native species and replacing trees would require irrigation until they become established." The authors claim the irrigation needs would be met by existing water supply capacity, but do not state what that capacity amount is, or quantify the amount of water needed for implementing the Management Plan, or the define the square footage of land to be irrigated. They also seem unaware that SFPUC is now required by law to charge city departments for water that once was free, which requires meters in the parks, which requires permission from the SFPUC to install the new meters.

4. The Initial Study failed to acknowledge that the Recreation and Park Commission, so far, has only approved of the project with amendments to have an environmental review under CEQA. The Commission did not give its approval of the project to be implemented as presented in the Natural Areas Management Plan. It has reserved this decision until after the completion of the CEQA review, at which time the Commission will decide if there will be further amendments to the project and what, if any, mitigations it requires to be done. This final authority must be acknowledged.

In conclusion, the Initial Study failed to include the rulings of the Recreation and Park Commission to amend the project and to direct the analysis of all 31 natural areas, and it does not recognize the Commission's authority to render the final approval of the project. The project description must be modified to reflect the authorized amendments. Compliance with Chapter 63 must be discussed. The oversights enumerated above must be corrected, and the scope of the Environmental Impact Report sufficient to address these issues.

Cc: Recreation and Park Commission  
Jared Blumenfeld, Interim General Manager, Recreation and Park Department



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**LOMA PRIETA CHAPTER**

San Mateo • Santa Clara • San Benito Counties

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**MAY 27 2009**

**CITY & COUNTY OF S.F.**  
PLANNING DEPARTMENT  
M E A

San Francisco Planning Department  
Attn. Mr. Bill Wyko, Environmental Review Officer  
1650 Mission St.  
San Francisco, CA 94103

May 24, 2009

Re: Natural Areas Management Plan EIR  
Pacifica Scoping Meeting for Sharp Park Golf Course  
Case No. 2005.1912 E

Dear Mr. Wycko:

The Sierra Club's Loma Prieta Chapter encompasses the Counties of San Benito, Santa Clara and San Mateo - and the Chapter's Coastal Issues Committee has particular focus on issues involving the Coastal Zone as defined in the California Coastal Act. The Sharp Park Golf Course is situated within the City of Pacifica within San Mateo County and, additionally, within Pacifica's Coastal Zone Local Coastal Program, certified by the California Coastal Commission. The Coastal Issues Committee supports San Francisco Planning Department's recognition of Pacifica in its role as the permitting authority for any work requiring a Coastal Development Permit at Sharp Park, and that that be duly considered as part of the EIR process.

Previously, the Loma Prieta Executive Committee passed a resolution that states in pertinent part:

“THEREFORE LET IT BE RESOLVED that the Sierra Club urges the City and County of San Francisco and the San Francisco Recreation and Parks Department to fully consider habitat protection and enhancement measures within Sharp Park Golf Course that could increase and stabilize California Red-legged Frog and San Francisco Garter Snake populations.”

Given the extraordinary jurisdictional issues attendant to Sharp Park, we support this particular public recreation property being evaluated by the City of San Francisco in an entirely separate manner, and not in the aggregate of the City's other golf courses and public lands that lie within San Francisco's borders and land use authority. We look forward to reviewing the completed Draft EIR analysis after the input of all of the other oversight agencies is gathered.

Thank you for providing this opportunity for comment.

Sincerely,

Merrill Bobele  
Sierra Club Loma Prieta Coastal Issues Committee



The San Francisco Tree Council

May 25, 2009

Bill Wycko, Environmental Review Officer  
**San Francisco Planning Department**  
1650 Mission Street, Suite 400  
San Francisco, CA 94103-2479

**Re: Expand the scope of the EIR on the Natural Areas Management Plan**

Dear Mr. Wycko,

Please expand the scope of the EIR to include a proper scientific study of virtues of Eucalyptus forest as described in today SF Chronicle, by Mr. Peter Ehrlich, the foremost knowledgeable expert on Eucalyptus.

**"Peter Ehrlich**, the head of forestry for the Presidio Trust, which manages the interior 80 percent of the park for the Golden Gate National Recreation Area. Mr. Ehrlich came to the Presidio in 2000 after serving as the forester for Golden Gate Park.

*"Without **eucalyptus** I don't think they could have stopped the winds or the moving sands in the Presidio," Ehrlich said. "The sea foam green canopies seen as one approaches the Presidio from Marin County are a significant part of the cultural landscape of San Francisco."*

*Blue gum eucalyptus trees were unique in that they would actually grow in the sandy soil and withstand the fierce winds blowing off the Pacific. They were used to establish Golden Gate Park, and in 1886, the Army began planting them on the ridges of the Presidio.*

Eucalyptus trees also are very effective wind breaks, Ehrlich said. Studies have shown that they slow the wind down at least 30 percent in the Presidio.

**Presidio branches out with eucalyptus swap**

<http://sfgate.com/cgi-bin/article.cgi?f=/c/a/2009/05/25/MNU717JSAI.DTL>

Peter Fimrite, Chronicle Staff Writer

Monday, May 25, 2009

Sincerely,

*Carolyn Blair*, Executive Director  
San Francisco Tree Council  
Member SF Urban Forest Council  
2310 Powell Street, Suite 305  
San Francisco, CA 94133  
[sftreecouncil@dslextreme.com](mailto:sftreecouncil@dslextreme.com)  
415-982-8793

*Working Together To Preserve & Protect Our Community Urban Forest,  
For Nourishment for the Soul, Consolation for the Heart  
And Inspiration for the Mind*

.....



Tom Borden  
<tom@intrinsicdevices.com>

05/26/2009 04:17 PM

To jessica.range@sfgov.org, bill.wycko@sfgov.org,  
dawn.kamalanathan@sfgov.org, lisa.wayne@sfgov.org

cc

bcc

Subject Please include off-road cycling in the NAP Recreational Trail  
EIR

Attention SFRPD, NAP, SF Planning Dept. and other parties involved in  
the Recreational Trails process:

I am a cyclist and member of SFBC and SF Urban Riders. I would like to  
urge you to include off-road bicycling in the scope of the Natural Areas  
Plan EIR. There are already lots of recreational cyclists riding in our  
parks and many more who would welcome the opportunity to ride on  
officially sanctioned trails. It is safer and more pleasurable to ride  
on trails in a natural setting, than on the streets where cars are an  
ever present danger.

I would like to see through-trails in the parks to allow cyclists to  
transit the city off-street as much as possible. Systems of loop riding  
trails should be implemented in some of the larger parks. Also, I would  
like to see at least one bicycle skills park built in the city. This  
would be an area of concentrated technical features analogous to a  
skateboard park, but made of wood, earth and rock. These things could  
be built cheaply and sustainably, largely with volunteer effort.

SF Urban Riders is a cyclist group working to promote off-road cycling  
venues within San Francisco. We are here to represent the interests of  
off-road cyclists, provide input to the city, volunteer labor, provide  
technical support, whatever it takes to get legitimate places to ride in  
the city.

Sincerely,

Tom Borden



Sent via e-mail on May 26, 2009 to bill.wycko@sfplanning.org

May 26, 2009

Bill Wycko  
San Francisco Planning Department  
Natural Areas Management Plan  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

**Re: Scoping comments on Natural Areas Management Plan**

These are the comments of the Center for Biological Diversity on the Significant Natural Resource Areas Management Plan regarding lands managed as “natural areas” by the San Francisco Recreation and Park Department - specifically those lands at Sharp Park in Pacifica.

The environmental review for the management of the natural areas must include an alternative that provides full ecological restoration of Sharp Park. The City of San Francisco should select full ecological restoration of Sharp Park as the preferred alternative for the management plan, to comply with the Endangered Species Act, manage Sharp Park consistently with the goals of the Natural Areas Program, provide suitable habitat for listed species at the site, and avoid legal liability to San Francisco for illegal “take” of listed species.

The full ecological restoration alternative should:

Eliminate the golf course holes at Sharp Park that are incompatible with maximizing suitable habitat for listed and sensitive species at Sharp Park, specifically the San Francisco garter snake, California red-legged frog, western pond turtle, San Francisco forktail damselfly, and salt marsh common yellowthroat;

eliminate all lawn mowing activities that have the potential to cause take of the San Francisco garter snake or the California red-legged frog, or to adversely modify habitat for these species;

restrict the use of all pesticides, including fungicides, herbicides, and rodenticides, known or suspected to adversely affect the California red-legged frog or the San Francisco garter snake, and include adequate buffer areas to prevent runoff of these pesticides into all aquatic habitats;

cease all use of inorganic fertilizers, and implement a nitrogen and phosphorous monitoring program to discover the extent of nitrogen and phosphorous pollution in Sharp Park water bodies;

cease existing animal burrow management policies and allow development of gopher holes and other burrows within suitable habitat as refugia for the California red-legged frog and San Francisco garter snake;

restrict or cease all water pumping at Horse Stable Pond, at a minimum ceasing all pumping activities between September 1 through May 31, and screening the pump adequately to prevent entrainment of any and all life stages of California red-legged frogs and other wildlife;

create basking and hibernating/estivating habitat for the snake, frog and western pond turtle within Laguna Salada, Horse Stable Pond, and Arrowhead Lake;

control invasive species in Laguna Salada, Horse Stable Pond, and Arrowhead Lake such as invasive fish and bullfrogs, using non-toxic control methods;

install unobtrusive fencing along the length of the sea wall, on its eastern slope, to keep recreational users from entering protected areas;

post interpretive signs around Sharp Park regarding the important habitat areas at Sharp Park and the importance of the San Francisco garter snake and the California red-legged frog; and

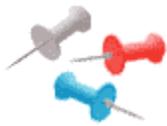
remove invasive exotic plants and lawn and replant the park and Sanchez Creek with appropriate native species.

The priority for management of Sharp Park should be to restore the park to its natural state as a coastal wetland, and provide more diverse recreational opportunities for the public at the site. The full ecological restoration alternative should prioritize endangered species protection and recovery, natural flood control, outdoor recreation, and sustainable land use.

Sincerely,



Jeff Miller  
Conservation Advocate  
Center for Biological Diversity



**Bill Wycko/CTYPLN/SFGOV**  
05/27/2009 09:30 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV  
cc  
bcc  
Subject Fw: Mountain Bicycle Recreation to be considered in NAP EIR

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 05/27/2009 09:33 AM -----



**Dayton Crites**  
<[dayton@surbanriders.org](mailto:dayton@surbanriders.org)>  
Sent by:  
[daytoncrites@gmail.com](mailto:daytoncrites@gmail.com)  
05/26/2009 11:24 PM

To  
cc  
Subject Mountain Bicycle Recreation to be considered in NAP EIR

To those it may concern,

My name is Dayton Crites, and I am one of many San Francisco citizens who values and treasures our open spaces, and does so by recreating through them on a mountain bike. I urge you to add consideration of multi-use trails and bicycle skills areas to the Natural Areas Program Environmental Impact Review.

I volunteer my time as a board member of SF Urban Riders, and as such, work with SF Urban Riders to create healthy off road cycling opportunities for all San Francisco residents. Please do not ignore this significant segment of the park users and stewards by excluding multi use trails and bicycle skills areas from the scope of the NAP EIR.

Off Road cycling is a fast-growing, healthy, and environmentally friendly recreational activity that appeals to a wide demographic. Not to mention the fiscal sense in building trails to enhance the value of our natural areas. Square foot by square foot, trails are perhaps the least expensive land value improvement that can be made due to minimal materials and maintenance costs.

There exist many federal funding sources that favor the inclusion of bicycle trails within natural areas. As a non-profit 501-c3, SF Urban Riders seeks to partner with SFRPD through identifying and procuring funding, as well as mobilizing a volunteer workforce to assist in the construction of trail systems and or bicycle parks.

To gain a sense of our vision for San Francisco's park lands, and why multi-use trails and bicycle parks offer such a wise investment for the City, please visit our website and download our proposal. Pardon the spelling error in the html link. I assure you the spelling is better in the proposal.

<http://sfurbanriders.org/wordpress/lead-story/unlease-the-proposal/>

Sincerely,

Dayton Crites  
SF Urban Riders  
415.734.7243



Donjacour family <donjaco@sbcglobal.net>

05/26/2009 11:48 PM

To jessica.range@sfgov.org

cc

bcc

Subject NAP environmental impact

Dear Ms. Range,

I just heard about the Natural Areas Program's plan to remove the current vegetation, especially Himalayan blackberry, from large areas of our city parks. As a wildlife rehabilitator and a native plant restoration volunteer, I would like to know more about this project. I understand that the proposal will be heard by the Rec and Park planning commission only. I have serious reservations about the impact that this project will have, both on the resident animals, especially mammals, and on the budget. It seems that in tough financial times Rec and Park's priorities should be on more immediate things than tearing up large swaths of animal habitat. I am very much a proponent of native plant restoration and volunteer weekly with GGNRA, but this project is misplaced and seems on a hasty path to approval. As a taxpayer I'd like to see my money spent for higher priority projects that take into account the many many animals that live in our parks. The non-native blackberry bushes are great habitat for many animals and provide food as well. We should carefully consider any changes that we make to plants that are so valuable to the animals that actually live in our city parks. We should also consider whether the money spent on a project like this could be better spent on pressing human needs. I urge you to not approve this project. I would also like to be informed of its progress.

Sincerely,

Annemarie A. Donjacour

San Francisco Planning Department  
EIR Public Scoping Meeting Written Comment Form  
Natural Areas Management Plan  
Case # 2005.1912E

If you wish to submit written comments on the above project, you may do so on this sheet (although use of this form is not required). Please submit written comments at today's public scoping meeting, or by mail to Bill Wycko, San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA 94103. **All comments must be submitted no later than 5 P.M., May 26, 2009.**

*Write your comments regarding the environmental review for the project here. Use the back of the sheet or additional pages if necessary.*

RECEIVED

MAY 26 2009

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
M E A

Name: Evan Elias

Organization (if any): neighbor and volunteer for SPCA

Address: 575 Belvedere St, SF, CA 94117

E-mail Address: eeliasmail@yahoo.com

Thank you for this opportunity to make comments on the scope of the EIR for the Natural Areas Management Plan.

I am a neighbor of the Interior Green Belt and Corona Heights Park. I volunteer with the SFSPCA to manage a Trap-Neuter-and Return feral cat colony in the area. I have spent four hours a week in the Interior Green Belt (IGB) for the past three years. During this nearly six hundred hours of being in and observing the forest there, I have learned a lot about the area and its fauna.

The initial study states that "...no important bird habitat has been designated." in the IGB. This is completely inaccurate. I have observed yellow warblers, Steller's Jays, bushtits, song sparrows, owls and Red-tailed Hawks. The yellow warbler is listed in the initial plan as a "species of concern" under CA state status. (Table 2, p.100.) Steller's

Jays and Red-tailed Hawks are listed as "species of local concern." (Table 3-5, p 3-34, p 3-33.)

I have also heard bird songs that I cannot identify, so there are potentially more sensitive bird species that live in or utilize the IGB. This is a biodiverse bird habitat that would be significantly negatively impacted by the removal of eucalyptus trees and brush.

The initial study also suggests removing fifteen Monterey Pines from the nearby Corona Heights Park. This park has a lot of Red-tailed Hawk activity. As previously mentioned, the Hawk is listed as a "species of local concern." in the initial study document. (Table 3-5, p 3-33.) Three Monterey Pines and a fourth large tree were recently removed near this area, two of the Pines because of disease. This loss of small bird habitat immediately led to a decrease in hawk activity. When their food source and perching

areas are removed, the hawks leave. Removing fifteen healthy trees in a known hawk area will significantly impact this species. These trees should not be removed.

The IGB has also been identified in the initial study as having "...no site specific wildlife related areas...." This area is home to skunks, raccoons, opossums and feral cats. The himalayan blackberry provides nesting area and protection for these local mammals. Where are they to go when their homes are destroyed?

The Natural Areas Resource group has singled out feral cats as a problem in local park areas. During my hours of observing, I have seen that the feral cats do not pose a threat to the local wildlife. The cats behave as part of the eco-system, not as top predators. The cats are cautious and on-guard in this environment, and their territory is small. The birds and mammals do not fear

them, and the cats do not exhibit hunting behaviors. Strange, but true.

I support habitat restoration and the protection of native species. But this forest is already home to many species that deserve the right to continue their existence.

In terms of Cumulative Impacts, UCSF is present applying for a FEMA grant to clear twenty three percent of the forest on Mt. Sutro and the IGB, and replant with natives. If the UCSF/FEMA plan and this Natural Areas plan both go forward, Mt. Sutro is slated to lose thirty percent of its present forest. This would be devastating in terms of lost bird and animal habitat. I strongly urge the EIR to take this other project into account when determining this plan's impact.

We are so lucky in San Francisco to have these open spaces in our midst. We need to manage them with care, taking into account all

the species that live in and depend on them. In our zeal to support and enhance some, it is important not to displace and discard others as if they are trash. All of our wildlife is valuable, and needs to be treated with respect.



May 26, 2009

Mr. Bill Wycko  
San Francisco Planning Department  
Natural Areas Management Plan  
1650 Mission St., Suite 400  
San Francisco, CA 94103

Re: Case No. 2005.1912E: Natural Areas Management Plan

Dear Mr Wycko:

The Golden Gate Audubon Society (GGAS) supports the Natural Areas Management Plan and we are pleased that an Environmental Impact Report (EIR) is being prepared for it. There are several matters of concern we wish to express, and we think that the scope of the EIR should be broadened to cover geology and soils.

Our greatest concern is not with the EIR, but with the plan itself. There is an error of fact, repeated several times, that the bird nesting season in San Francisco and Pacific begins on April 1. That is incorrect. The nesting season for most local bird species is from about February 15 through July 15. In fact Great Blue Herons, owls and hummingbirds may begin nesting in January. Most birds that nest in woodlands, scrub and marshes are on territory by early to mid March and have eggs by April 1. Should vegetation removal take place between mid February and the end of March there will be serious negative impacts to many nesting species. If the plan cannot be changed, this error must be addressed through the EIR process. A reasonable practice that would ensure the safety of almost all nesting birds would be to follow the practices outlined in the plan from February 15 to July 15. Areas that are scheduled for vegetation removal between January 1 and February 15, or July 15 and September 1, should be surveyed for bird nests and nesting activity. If nests are found the project should be modified to ensure that nesting birds are not disturbed.

A4.4 Best Management Practices, Erosion Control: Wood chips may be appropriate in some locations but the use of this erosion control method should be evaluated so that it does not negatively impact wildlife including birds and bees. This should include consideration of birds that require dirt areas for dust baths.

GR-6b and c: These sections suggest using nest boxes for cavity nesting birds and in particular Wood Ducks. This idea may be more appropriate in our "naturalistic parks". Cavity nesting birds were probably fewer prior to the introduction of large trees in San Francisco. Nest boxes may replace cavity nests in such woodlands, but they would be alien in other natural areas. The issue of introducing non-native species into the City is another matter. There are no historic nesting records for Wood Duck in San Francisco County except for one report from the San Francisco Zoo that may have involved a wild Wood Duck with one from the zoo collection. Use

**GOLDEN GATE AUDUBON SOCIETY**

2530 San Pablo Avenue, Suite G Berkeley, California 94702

phone 510.843.2222 fax 510.843.5351 web [www.goldengateaudubon.org](http://www.goldengateaudubon.org)

of nest boxes to enhance nesting for non-native species is questionable and is not supported by GGAS. Use of nest boxes as part of the natural areas plan such as this should trigger consideration in an EIR.

GR-15c: This section suggests maintaining urban forest health by removing dead and dying trees that show signs of disease or insect infestation. This is inconsistent with GR-6a, which calls for leaving snags and dead branches on live trees unless they are hazardous. The EIR should address the issue of snags and standing dead trees and perhaps even suggest alternatives to guide this plan. GGAS has long advocated for a snag policy in San Francisco and we would certainly support developing one through this EIR process.

A 5.15 India Basin Shoreline Park: India Basin Shoreline also supports a huge number and variety of species of waterfowl from fall through spring.

A 5.18 Lake Merced: The project description mentions the Double-crested Cormorant colonies at Lake Merced, but fails to mention Great Blue Herons. Though not a listed species, the herons should be mentioned in this document. In the past Great Blue Herons have shared the three colony sites with cormorants. In 2009 herons nested only in the North Lake Colony and the Mesa Colony.

LM-6c: Permitting access to the shores of the East Lake during any time of year should trigger consideration in the EIR. Such access would increase erosion and if allowed in the time frame suggested of September 1 through March 31 would be likely to impact several nesting species, including the “San Francisco” Common Yellowthroat. This certainly requires consideration in the EIR.

PL-2: This section should be applicable to all Natural Area sites and include Great Horned Owl, Western Screech Owl and Barn Owl nests.

Table 2: Special Status Species...: This should not be limited to breeding birds but should include other species that depend on natural areas during some part of the year. Tri-colored Blackbird utilize Lake Merced during the fall and winter. Brown Pelicans and Peregrine Falcons utilize both Lake Merced and India Basin on an occasional basis. A thorough search of bird records for San Francisco County would identify other species of concern that use natural areas.

### E.13 Geology and Soils

We are deeply troubled that impacts on geology and soils are not considered potentially significant. In and of themselves, we see little impact from the projects. It is impacts that result after the projects are in place that should trigger consideration in the EIR. A5.22 Pine Lake is a case in point. Erosion due particularly to off leash dogs and their owners is a significant impact that is resulting in destruction of restoration sites. An associated problem is soil and water contamination resulting from dog and feral cat waste. These are impacts that are likely at other restoration sites like Buena Vista Park, Lake Merced, McLaren Park, and other parks with sandy soils and steep terrain. These impacts need to be treated in the EIR and solutions should be considered. We urge that the EIR process be applied to Geology and Soils.

In the discussion of Lake Merced under Geology and Soils removal of trees on the lake’s banks is cited as a potential cause of erosion. The EIR should also consider the impact of not removing single cypress and pines along steep banks that cannot sustain them. Trees such as these have historically fallen and have taken significant amounts of soil with them. There are no cases of trees that were removed causing erosion. This matter in itself should trigger inclusion in the EIR.

Finally, we suggest the EIR should include an updated, comprehensive biological inventory that identifies and describes all species of concern within San Francisco County, their distributions, and their population conditions. If this exceeds the scope of this plan, then a comprehensive biological inventory should be developed specifically for the Natural Areas covered by this EIR.

Thank you for the opportunity to comment on this matter. If you would like to discuss these matters please feel free to contact me at <murphsf@yahoo.com>.

Very truly yours,  
Dan Murphy

Golden Gate Audubon Society  
Conservation Committee  
2945 Ulloa St.  
San Francisco, CA 94116  
(415) 564-0074

May 26, 2009

RECEIVED

MAY 26 2009

Martha Hoffman  
1750 Waller Street  
San Francisco Ca 94117

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
RECEPTION DESK

Bill Wycko  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street  
San Francisco, California 94103

RE: Significant Natural Resource Area Management Plan (SNRAMP),  
Environmental Impact Report, Case No. 2005.0912E

Dear Mr. Wycko:

I attended the May 12, 2009 public scoping meeting, and I want to make a brief written comment reflecting the spoken comment that I made at the meeting.

In asking you to look at issues in the Natural Areas Management Plan (NAP), I am particularly concerned with animal welfare issues.

I live next to Golden Gate Park and near the Stanyan and Belgrave Streets entrance to the Interior Green Belt. I have worked on San Francisco SPCA (SF/SPCA) projects in those areas over the years and am very familiar with the areas.

*First*, while I support restoration efforts, I do not want to lose our forests and I am especially concerned about losing protective habitat for wildlife such as raccoons, skunks, possums, etc. For example, Himalayan blackberry offers protective animal habitat. Extensive clearing of underbrush and blackberry removal must be studied in terms of potential negative impacts. Areas of its protection must be maintained (with regards to the CEQA requirement, E.12 Biological Resources, Topic d: no project shall “interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sights”). In this regard Jamie Ray, Director of the San Francisco Wildlife Rehabilitation Program, must be consulted. Ms. Ray is licensed by the California Department of Fish & Game ([sfromp.org](http://sfromp.org)).

The initial study contains tables listing sensitive species, special status species and an appendix listing bird species found within the Natural Areas. A listing of all animals found within the Natural Areas must be added to these lists.

*Second*, In regard to feral cats, G.R.7 continues to be very flawed. It must either be removed or completely revised in cooperation with San Francisco Animal Care and Control and San Francisco SPCA.

As a longtime volunteer in the SF/SPCA Feral Cat Program, I have extensive knowledge and experience in observing and working with feral cats in San Francisco. There are very few cats in San Francisco's designated Natural Areas. This is because of the SF/SPCA's Feral Cat TNR (trap, neuter, return) Program. Feral cats should not be singled out as the primary predator or some kind of urgent threat. That is very misguided. From my experience in the field, I would say that they have little impact.

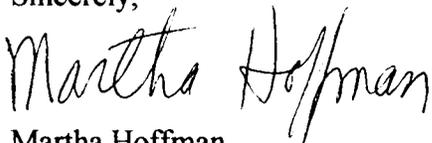
In NAP's discussion of feral cats, rather than focus on the reality in San Francisco, NAP has chosen to dwell on anti-cat and out of state studies. These studies tell us nothing about the feral cats in San Francisco. Alley Cat Allies (alleycat.org) should be consulted as a resource regarding feral cats.

All matters of policy concerning animals in San Francisco need to involve communication and working together with San Francisco Animal Care and Control and the SF/SPCA. NAP has given lip service to these agencies, but has really not shown good faith in working with them. This is not acceptable.

*Third*, Educational materials must not be about good and bad plants and animals. Respect for all plants and animals must be nourished and developed. Under G.R14, educational materials must have input from all stakeholders including San Francisco Animal Care & Control, the San Francisco SPCA, Recreation and Parks Department and local wildlife expert Ms. Jamie Ray, through the San Francisco public process. Educational materials must not be developed solely by the Recreation and Parks Department.

G.R.7b lists the Cats Indoors program from the American Bird Conservancy as a source of educational information about feral cats and states that the Cats Indoors program is approved by the San Francisco SPCA. *In fact it is NOT approved by the San Francisco SPCA* and is seen as extremely anti-cat and misinformed in its bias. That claim of approval must be removed.

Sincerely,



Martha Hoffman  
M.S.W. University of California at Berkeley  
Landscape Gardener  
San Francisco Feral Cat Program



National Park Service  
U.S. Department of the Interior

Golden Gate National  
Recreation Area

Fort Mason  
Building 201  
San Francisco, CA 94123

415-561-4930 phone  
415-561-4939 fax

## Golden Gate National Recreation Area Fax

To: Jessica Lange  
Fax number: 415-558-6409  
From: Steve Ortega  
Date: 5/26/09  
Pages to follow: 2

**Comments:**

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If there is a problem, please call: LeeAnn Ciancetti  
Telephone: 415-561-4930

EXPERIENCE YOUR AMERICA

The National Park Service cares for special places saved by the American people so that all may experience our heritage.



**United States Department of the Interior**

NATIONAL PARK SERVICE  
Golden Gate National Recreation Area  
Fort Mason, San Francisco, California 94123

IN REPLY REFER TO:

L76 (GOGA-PLAN)

May 26, 2009

Bill Wycko  
San Francisco Planning Department  
Natural Areas Management Plan  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

Subject: Comment Extension Request – Natural Areas Management Plan Initial Study

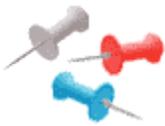
Dear Mr. Wycko:

This letter is in response to the Notice of Preparation of the Initial Study for the Natural Areas Management Plan. Due to staff shortage and vacations we were unable to gather comments regarding this plan by today's due date, May 26, 2009. We would like to request an extension of this due date to Friday, June 5, 2009 so that we may have more time to gather comments.

If you have questions or require additional information, please contact Steve Ortega, Environmental Protection Specialist, at (415) 561-2841.

Sincerely,

Nancy Hornor  
Planning Division Chief



**Bill Wycko/CTYPLN/SFGOV**  
05/26/2009 09:16 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV  
cc  
bcc  
Subject Fw: Natural Areas Management Plan scoping comments

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 05/26/2009 09:18 AM -----



**Celeste Langille**  
<cclangille@earthlink.net>

05/25/2009 11:30 PM

Please respond to  
Celeste Langille  
<cclangille@earthlink.net>

To bill.wycko@sfgov.org  
cc  
Subject Natural Areas Management Plan scoping comments

May 25, 2009

Bill Wycko  
San Francisco Planning Department  
Natural Areas Management Plan

Below are my scoping comments on the the City of San Francisco Planning Department's Natural Area Management Plan project EIR. I am a resident of Pacifica, a current City of Pacifica Planning Commissioner, and a former member of Pacifica's Open Space Committee and also a former member of the City of Pacifica's GGNRA Liaison Committee. I am submitting these comments solely on my personal behalf and my comments are focused on the Natural Area Management Plan involving Sharp Park.

I applaud the goals set forth in the Initial Study and the Natural Areas Program environmental review process.

I would like the City to review and select a full restoration alternative for Sharp Park. Also, the EIR must consider current information regarding sea-level rises and the impact on the western portion of Sharp Park.

The eastern canyon areas (east of Highway One)of Sharp Park contain especially well-preserved native habitat, important populations of special-status species, and other natural areas values. The eastern canyon areas of Sharp Park are susceptible to human impacts and should be off-limits to dogs. The EIR should not select any alternatives involving activities in Sharp Park that would increase recreation demands, including those involving increased vehicle traffic.

I fully support the Recommended Management Actions set forth in the Initial Study and would add restoration of all of Sanchez Creek as a goal. The Conservation and Restoration goals for all areas of Sharp Park in Pacifica should continue to be to maintain all viable populations of special-status species, improve habitat and natural areas connectivity, and prevent introduction of and decrease the amount of non-native invasive species.

Thank You,  
Celeste Langille



Mitch Monroe  
<[mitch@sfdirtlab.com](mailto:mitch@sfdirtlab.com)>  
05/26/2009 03:23 PM

To [jessica.range@sfgov.org](mailto:jessica.range@sfgov.org)  
cc  
bcc  
Subject NAP EIR Scoping Comments

Jessica and others,

Thank you for involving the community of Pacifica to be a part of the scoping process for the upcoming DRAFT EIRs for San Francisco's Natural Areas.

Please pass this along to your contemporaries at SFRPD, NAP, SF Planning Dept., and any other interested parties involved in the Recreational Trails process.

SF Urban Riders is a Non-Profit 501c3 whose goal is to create healthy off road cycling recreation for all users, and encourage youth opportunities. We represent a growing number of recreational cyclists who are asking in unison to Please ADD multi use trails, off road bicycle trails, single track trails, and bike skills areas to the EIR scope of any projects in our larger parks and open spaces.

Off Road cycling is a growing contemporary activity that provides healthy recreation accessible at any level of entry, and appeals to a wide demographic. Trails are also the cheapest form of recreational improvement that can be made because they are sustainably designed, then constructed of natural materials by a large volunteer effort. There are many available federal funding sources that favor the inclusion of bicycle trails. SF Urban Riders would make a good partner with SFRPD on many levels and improve the overall quality of our parks.

Please refer to our Bicycle Trail Master Plan which was submitted to SFRPD in mid-April.

In closing, please add bike trails, single track trails and bike skills areas to the NAP EIR Scope.

Best regards,

--

Mitch Monroe  
SF DIRTLAB  
[mitch@sfdirtlab.com](mailto:mitch@sfdirtlab.com)  
650-255-4323

## Nature in the City

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Tuesday, May 26, 2009

To: Bill Wycko  
San Francisco Planning Department  
Natural Areas Management Plan  
1650 Mission Street  
Suite 400  
San Francisco Ca 94103

From: **Nature in the City**  
Peter Brastow, Founding Director  
Re: *Initial Study, Significant Natural Resource Areas Management Plan*

1. The SNRAMP EIR must include a **maximum possible ecological restoration** alternative for Recreation and Park's 31 Natural Areas, so that the public has the opportunity to understand the potential for a biodiverse urban ecological future, and how that future would affect people and our environment.

The maximum possible ecological restoration alternative would include the following, for example:

- a. Eradication or thorough control of all invasive plants on the San Francisco Weed Management Area (SFMWA) priority weed list.
- b. Removal of all isolated invasive tree and shrub stands (not including ones that are serving a specific wildlife habitat function from year to year) from within natural areas to optimize continuity of native wildlife and rare plant habitat.
- c. Total enforcement of leash laws in our parks and natural areas, so that, in effect, dogs are **ONLY** off-leash in DPAs, many of which should be moved away from natural areas for this alternative.
- d. Total integration of the Cats Indoors Program ([http://www.goldengateaudubon.org/html/catsindoors/catsindoors\\_page\\_2.htm#Resources](http://www.goldengateaudubon.org/html/catsindoors/catsindoors_page_2.htm#Resources)), so that feral cats are not allowed to harm birds and other wildlife and themselves.
- e. No designation for MA1s, MA2s, MA3s. The natural landscape must be examined, planned, evaluated and managed as a whole for the benefit of San Francisco's natural heritage and biodiversity.

2. The management framework of MA1s, MA2s and MA3s presents some real problems; instead of explicitly addressing the ecological fragmentation of our natural heritage, this arrangement perpetuates it with a fragmented management approach for the natural areas. Regardless of the relative value of different pieces of our natural areas, they should be managed with coherence, continuity and consistency for wildlife, rare plants, and ecosystem processes. MA-3s should not be subject to “few restrictions on recreational use” nor the “prohibition on (re)introduction of sensitive species.” The lines between the areas are fuzzy, and so they should be managed as a whole with the highest degree of conservation protection. Discard the MA1s, MA2s, MA3s approach. If this approach is ultimately applied to Tank Hill, for example, then the unique south-facing cliff habitat will always be considered an “MA3” with no opportunity for restoration of native plant and wildlife habitat.

3. The EIR should thoroughly evaluate the environmental impacts of leaving so many – 95% - of the invasive trees in the natural areas, according to the current plan.

4. The EIR should comprehensively evaluate the impacts of off-leash dog use on San Francisco Natural Areas and the fact that 90% of Dog Play Areas are in the natural areas, according to the current plan.

5. On Page 8 of the NOP, it states, “Trails would be created in previously inaccessible areas, as opposed to improving social trails.”

In general, new areas should not be opened up for trail use. Hundreds of miles of social trails criss-cross the natural areas. These should be either improved, if appropriate or closed if appropriate, and the decisions should be based on a comprehensive approach to trail planning. Environmental impacts from trail building, restoration, and closure should be comprehensively evaluated.

6. The impact of the golf course on the natural areas and natural resources at Sharp Park should be thoroughly evaluated, particularly for the impact to the federally-listed endangered San Francisco garter snake and the federally-listed threatened California red legged frog. The preferred alternative should be the one that recovers the San Francisco garter snake to self-sustainability.

7. Geology and Soils should not be eliminated from the effects discussion in the EIR. We need to know the impact to our native geology and soils from:

- a. Rampant commercial off leash dog walking.
- b. Leaving eucalyptus and other tree species growing on steep cliffs, where they can contribute to severe bedrock erosion events.
- c. Continued deposition of cypress and eucalyptus duff into the natural chert and other Franciscan soils.

Sincerely,

Peter Brastow, Founding Director

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**INTEROFFICE MEMORANDUM**

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**TO:** SAN FRANCISCO PLANNING DEPARTMENT

**FROM:** BRENT PLATER, GOLF COURSE TASK FORCE MEMBER

**SUBJECT:** COMMENTS ON SCOPING FOR THE NATURAL AREAS MANAGEMENT PLAN AND THE FINAL PROS CONSULTING REPORT ENTITLED SAN FRANCISCO RECREATIONAL OPPORTUNITIES SUMMARY REPORT

**DATE:** 5/26/09

**CC:** SAN FRANCISCO RECREATION AND PARKS DEPARTMENT, SAN FRANCISCO RECREATION AND PARKS COMMISSION, SAN FRANCISCO BOARD OF SUPERVISORS, NANCY PELOSI, JACKIE SPIER, LEELAND YEE, MARK LENO, TOM AMMIANO

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**INTRODUCTION**

This memo provides scoping comments on the Significant Natural Resource Areas Management Plan, and the Laguna Salada Wetlands Enhancement Project at Sharp Park. It also provides comments on Pros Consulting, Inc.'s August 2008 report entitled San Francisco Recreational Opportunities Study Summary Report.

Sharp Park, located in Pacifica but owned and operated by the City and County of San Francisco, is arguably the most important natural area within the Recreation and Parks Department's jurisdiction. The status quo at Sharp Park is unsustainable: the golf course that occupies much of the property is losing money, killing two endangered species, and threatens the surrounding community every year when the golf course floods. These problems are only going to get worse as our climate warms and sea levels rise. Much of the comments I provide will address how to ensure that Sharp Park becomes a community-centered model for outdoor recreation, endangered species recovery, and natural flood control.

As a member of San Francisco's Golf Course Task Force, I was asked to provide comments on the Summary Report, and in particular, to comment on the assumptions made and analysis provided by the Summary Report. Moreover, because I was appointed to the Golf Course Task Force to represent San Francisco's environmental community, I have provided comments that address the environmental consequences of San Francisco's existing golf programs and services, as well as the likely consequences that would occur if any of the Summary Report's recommendations were implemented by San Francisco. See Exhibits AA, KK.

**COMMENTS ON THE LAGUNA SALADA WETLANDS ENHANCEMENT PROJECT,  
THE SIGNIFICANT NATURAL RESOURCE AREA MANAGEMENT PLAN, AND THE  
FINAL YOUNGER REPORT.**

The environmental review for the Significant Natural Resource Areas Management Plan includes an enormous amount of funding and work to implement site-specific measures at Sharp Park. These measures are designed to reduce the take and encourage the recovery of two protected species: the California red-legged frog and the San Francisco garter snake. To ensure that the San Francisco garter snake recovers, the City must analyze and select full restoration alternatives that redesign or eliminate the golf course at Sharp Park.

**A. SHARP PARK GOLF COURSE IS LOSING MONEY.**

Sharp Park Golf Course costs the City and County of San Francisco hundreds of thousands of dollars a year in net losses to operate, losses that are not and cannot be recovered by the revenue generated by the golf course. The drain Sharp Park places on San Francisco resources robs our other municipal golf courses of needed maintenance; delays the golf fund's repayment of monies borrowed from the open space fund; and puts San Francisco's neighborhood parks and community centers at risk of closure.

These losses have been largely hidden to the public because of an incomplete accounting system: many of the expenses that the City spends to maintain Sharp Park Golf Course are not sourced from the Golf Fund, and therefore are not directly counted against the golf operations. For example, this Fiscal Year San Francisco spent approximately \$240,000 from the Capital Fund to fix Sharp Park Golf Course's endangered species-killing pump house. See Exhibit C. San Francisco also spent \$24,000 to hire monitors from the Natural Areas Program to reduce the number of endangered species killed by the golf course's operations this fiscal year, see Exhibit D, and even the environmental review process for the Laguna Salada Wetlands Enhancement Project—which is a prerequisite for the golf course to obtain permits to kill the endangered species found at Sharp Park—costs San Francisco taxpayers over \$412,000. See Exhibit E.

But even within the Golf Fund, Sharp Park loses a staggering amount of money each year, money that could be used to provide recreational services where San Franciscan's actually live. For example, between Fiscal Year 04-05 and Fiscal Year 07-08, Sharp Park Golf Course drained between \$30,000 and \$300,000 each year from the golf fund alone. See Exhibit A. The variation in year-to-year losses is related to the number of rounds sold at Sharp Park, which in turn is driven by the wet conditions at Sharp Park that often leave the course unplayable.

Even these losses were hidden by official reports provided by the Recreation and Parks Department. See Exhibit B. The losses to the Golf Fund were hidden for three reasons. First, Exhibit B lists as revenue a subsidy to the Golf Fund from the General Fund. But the General Fund is simply a separate account that holds taxpayer monies: to a San Francisco taxpayer, this is simply another expense, not revenue generated by golf course operations. Second, Exhibit B lists as an expense funds repaid by Harding Golf Course to the Open Space Fund. But like the General Fund “revenues,” this is not a true expense to San Francisco taxpayers, but just a transfer of taxpayer funds from one account to another.<sup>1</sup> Third, Exhibit B shows that a large sum of money is placed every year in a “golf unallocated” column. These are revenues and expenses that are drawn from or paid into the upkeep and management of each golf course, and to understand how each course is doing a methodology must be used that allocates these revenues and expenses to each course. Each of these three limitations in the RPD data are corrected in Exhibit A: the general fund and open space transfers are removed from the balance sheet, and the unallocated expenses and revenues are allocated to each course using two different methodologies, for comparison. Thus, Exhibit A is the most accurate reflection available of the day-to-day course operation and maintenance costs for Sharp Park and the City’s other municipal golf courses. Combined with the subsidies provided to Sharp Park from the City’s other sources of revenue, the golf course’s drain on fiscal resources amounts to hundreds of thousands of dollars each year.

Future costs of Sharp Park Golf Course operations are predicted to be even more dire. In 2007, the Recreation and Parks Department concluded that unless changes are made at Sharp Park Golf Course, operating losses at Sharp Park Golf Course will total in the millions of dollars. See Exhibit F. Moreover, Sharp Park’s illicitly built sea wall is likely to erode away due to anticipated changes to our ocean and coast wrought by climate change. See Exhibit G. Armoring the sea wall, which will be necessary only if Sharp Park Golf Course remains, will cost upwards of \$32,000,000. See Exhibit H. Even the golf course’s water supply is likely to become more expensive: the 400,000 gallons of water needed for peak demand must be provided by recycled water if we are to address ongoing droughts, and a recycled water project for Sharp Park is expected to cost \$8,000,000. See Exhibit I.

The status quo at Sharp Park Golf Course is infeasible and simply cannot hold. The golf course operations lose too much money, money that could be spent to improve San Francisco’s other

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<sup>1</sup> It is of course a justified transfer, as Harding Park was given a large loan from the Open Space fund in order to upgrade the golf course several years ago, but to date has been unable to completely repay the funds it borrowed.

municipal golf courses, or keep our community centers open for more hours each day, or fund other essential city services.

**B. SHARP PARK PROVIDES A POOR GOLF EXPERIENCE, AND REFURBISHING THE GOLF COURSE IS NOT FEASIBLE.**

Sharp Park Golf Course provides a poor golfing experience, and improving this experience will require tens-of-millions of dollars in permitting fees and capital improvements that the City and County of San Francisco simply doesn't have, making any proposed improvements infeasible.

Sharp Park Golf Course is considered substandard by nearly any golf measure. See Exhibit M. The National Golf Foundation found that Sharp Park Golf Course has poor turf conditions, an outdated and ineffective irrigation system, inadequate drainage, flooding problems, and dangerous cart paths. See Exhibit L. Moreover, a survey of golfers indicated that Sharp Park received "F" grades for friendliness of staff, conditions of golf carts, the availability of golf amenities, on-course services, the conditions of the golf greens, and overall course conditions. *Id.*

Because of the substandard conditions, golfers exhibit "very little loyalty" to the course: they play there primarily because it is cheap, rather than because of the quality or history of the course. See Exhibit L. Indeed, the existing prices—which are some of the lowest in the Bay Area golf market—are believed to be all the market will bear by golf industry experts given the poor conditions at the course. See Exhibit L. Yet even at the existing price points, rounds played at Sharp Park have declined precipitously. Between 2000 and 2006, rounds played at Sharp Park declined by 38%. See Exhibit L. Because of this, Sharp Park currently operates at 45% of its overall capacity, about 15% below industry standards. See Exhibit M. Thus, Sharp Park cannot increase its contribution to the golf fund simply by increasing prices: if prices are raised without concomitant improvements to the golf experience golfers would choose to play elsewhere, reducing overall revenues received from the golf course.

PROs Consulting has argued that Sharp Park should nonetheless be restored to the original Alister MacKenzie design and marketed as an elite, historic golf course. See Exhibit M. Capital improvements alone for this alternative are expected to run as high as 14 million dollars. *Id.* Additional costs for permitting from the U.S. Fish and Wildlife Service, the Department of Fish and Game, and the Coastal Commission are likely to cost an additional 5-10 million dollars. PROS Consulting, the National Golf Foundation, and the Recreation and Parks Department all agree that this level of capital investment is not possible from the City and County of San Francisco. See

Exhibits L, M, F. Instead, the proposals suggest privatizing Sharp Park Golf Course operations by executing a long-term lease with a golf developer, allow the developer to raise prices to \$120 per round and up, busting the labor union that works at the course, and using these incentives to convince the golf developer to invest the capital necessary to refurbish Sharp Park Golf Course. *Id.*

None of these requirements—privatization, union busing, and raising golf prices by an order of magnitude—are likely to be palatable in San Francisco. But even if these requirements could be met by San Francisco, it is unlikely the market could support such a golf course at this time or in the future. First, the collapse of the capital market in the past year makes it highly unlikely that the type of capital necessary to refurbish Sharp Park could be obtained: particularly when it is unlikely that permitting agencies such as the U.S. Fish and Wildlife Service and the Coastal Commission would ultimately permit such an intensive use of Sharp Park. More importantly, the Bay Area golf market is already oversupplied causing courses to close and driving prices downward precisely when Sharp Park would have to raise them. Golf demand is declining nationwide, see Exhibit J, and in the Bay Area the decline is particularly acute: the Bay Area currently supplies 6,000,000 more rounds of golf each year than Bay Area golfers demand.<sup>2</sup> See Exhibit K.

Under these market conditions, golf courses will close, and increasingly golf courses that do close are not used for open space, but for urban infill and other developments. See Exhibit O. For example, a municipal golf course in Livermore has been proposed to be partially sold to developers. See exhibit N. Because Sharp Park contains a deed restriction requiring the land to be used as a “public park, or public playground,”<sup>3</sup> it cannot be developed. Because of this, if Sharp Park remains open through ongoing government subsidy, it is likely that some other, better golf course will fail, the land will be sold, and the land will be converted to a more intensive development use. Conversely, if Sharp Park were to close, this would help sustain the market for other, better golf courses and because of Sharp Park’s deed restriction we would not face concerns about development pressures impacting the existing open space landscape at Sharp Park.

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<sup>2</sup> This data, from PROs Consulting, is likely an underestimate of the excess golf capacity in the Bay Area. PROs did a regional assessment of golf supply, but based Bay Area demand for golf on national averages, rather than conducting local assessments for golf demand. This is likely to overestimate golf demand in the Bay Area: the Bay Area is blessed with a multitude of recreational opportunities that compete with golf for our recreational time and dollars, and existing data indicates that regional golf courses continue to operate below capacity because of it.

<sup>3</sup> The deed restriction does not state that the land must be used for “recreational purposes,” as is often reported. The existing golf course, which precludes entry to Sharp Park to anyone that is not golfing or obtains prior permission from the private golf concession arguably violates the deed restriction.

**C. SHARP PARK GOLF COURSE DESTROYED HISTORIC HABITAT FOR ENDANGERED SPECIES AND CONTINUES TO TAKE SPECIES WITHOUT A PERMIT.**

Sharp Park has always provided suitable habitat for the San Francisco garter snake and the California red-legged frog, but the construction of Sharp Park Golf Course and the building of Sharp Park's sea wall has destroyed the vast majority of habitat present at the site. However, the Laguna Salada enhancement plan seems to presume that Laguna Salada was a salt-water lagoon that was inhospitable to the snake and the frog. It therefore seems to presume that the golf course and sea wall somehow prevent Laguna Salada from becoming too saline for these animals to survive. This erroneous assumption hinders the ability of the Recreation and Parks Department to consider feasible restoration alternatives at Sharp Park.

As a preliminary matter, the California red-legged frog is relatively tolerant to salinity for an amphibian, which is why we have exemplary coastal populations at places like Rodeo Lagoon at Fort Cronkhite and Abbotts Lagoon in Point Reyes. See Exhibit P. Indeed, a little bit of salinity is good for the frog, because the non-native, invasive, and predatory bullfrog is less tolerant of salt, and so a little salinity actually ensures that the California red-legged frog population remains robust while the bullfrog population is constrained.

Historically, both the California red-legged frog and the San Francisco garter snake thrived at Sharp Park: until the golf course and sea wall destroyed the functioning ecosystem there. See Exhibit Q. Sharp Park once contained a backbarrier lagoon system that protected the lagoon from coastal intrusion except in the most extreme storm events. During these events, salt water intrusion would be balanced against freshwater rainfall and freshwater drainage that funneled from the large watershed into Laguna Salada, keeping salinity levels balanced and low enough for the frog to survive. This would occur until the backbarrier lagoon would "heal" itself through natural sand movement that would rebuild the barrier system. Moreover, because the golf course did not exist, there was a gradient of wetlands upland of Laguna Salada, each with higher freshwater content, that the frog and snake could use through small-scale migrations until optimum conditions returned to the lagoon. See Exhibit R.

However, when the golf course was built, these upland wetland habitats were completely destroyed. Moreover, in a great act of hubris, Alister MacKenzie destroyed the natural barrier along the ocean in order to place 7 links of golf on the beach. When MacKenzie did this, massive coastal

floods were unleashed on Sharp Park and destroyed all seven of these holes, and in one instance ocean sea waters crept inland as far as the Sharp Park golf course clubhouse. See Exhibit S.

The frog and snake populations survived this inundation. The earliest surveys for the San Francisco garter snake at Sharp Park date back to the 1940s, after the course was designed but before the illicitly-built sea wall was constructed to protect Sharp Park from further coastal storms. At that time, the snake was considered “abundant” at Sharp Park. But follow-up surveys in the 1970s found a population in decline, and then, subsequent to the construction of the sea wall, surveys indicated that the snake was near extinction. In 2006, the US Fish and Wildlife Service concluded that a lawn mower killed a San Francisco garter snake at Sharp Park. See Exhibit T. Examination of the dead San Francisco garter snake indicated lacerations consistent with lawn mower blades and grass clippings in the wounds. See Exhibit U. In 2008, one to two San Francisco garter snakes were observed all year. See Exhibit V.

Today, the frog and the snake are literally squeezed between a fairway and a hard place. The golf course has destroyed all suitable upland habitats. If the sea wall were to fail—and it will unless we invest millions of dollars to armor the sea wall or replace it with the natural barrier protections that were once there—the frog and the snake would not have any upland wetland areas to move into. Moreover, even if the sea wall does not fail, there is currently not enough habitat at the lagoon to ensure that the snake can recover: the population would remain at such a low level that a random event such as a disease or pollution spill or poaching would result in the extirpation of the population.

Moreover, the golf course’s ongoing maintenance and operations take both species. Yet the City does not have a permit to take either species; it has implemented no mitigation measures to reduce take of the snake to date; and the mitigation measures that have been implemented to reduce take of the frog are not effective in reducing take of frog egg masses and tadpoles to zero. See Exhibit V. In addition, most of the California red-legged frog egg masses are laid at Horse stable Pond, where Sharp Park Golf Course’s pump house is found. After the recent \$240,000 construction project to fix a broken pipe from the pump house through the sea wall to the ocean, biologists concluded that entrainment of frog egg masses, tadpoles, and perhaps adults could occur, pumping individuals from Laguna Salada out to sea. See Exhibit W.

Because the San Francisco garter snake is a fully protected species under California law, the golf course’s operations and maintenance can never be incorporated into a take permit for the species.

Therefore, as long as the golf course is in operation, it will be at risk for substantial civil and criminal penalties for taking the species. Take may occur directly, such as killing snakes with lawn mowers, or it may occur indirectly, through habitat modification that leads to the death or injury to individual animals, especially through the modification of habitat in ways that significantly impacts essential behavior patterns such as breeding, foraging, estivating, and other activities.

If the City were to attempt to obtain a permit for the Laguna Salada Wetlands Enhancement Project or the Natural Areas Program Management Plan that incorporates the threat to the species—the golf course ongoing maintenance and operations—into the permit, or the Department of Fish and Game were to issue such a permit, the permit would be unlawful, as only bona fide restoration and recovery efforts are eligible for fully protected species take permits under California law.

In the absence of any legal authority to continue golf course operations without violating California and federal environmental laws, alternatives that retain the golf course in its existing configuration and cause take are simply not feasible, and cannot be assessed under CEQA. Only alternatives that reduce take to zero with a reasonable certainty may be assessed as feasible alternatives under CEQA. Only alternatives that eliminate or redesign the golf course can meet this standard, and therefore these are the only alternatives that can be assessed as feasible.

The importance of Sharp Park for the long term survival and recovery of the San Francisco garter snake cannot be overstated. It is the northernmost population within the species range, and as climate change shifts the species habitats northward, this population is therefore the most likely to successfully adapt to changing conditions. See Exhibit LL. It is also the most genetically intact of any population, which means it is the population that could best serve as a source population for the reintroduction of the species into historic habitats. *Id.* And reintroduction is needed: existing recovery goals require 10 viable populations be present in the wild before the species can be considered recovered, and at present there may only be six populations, none of which are known to be viable in the long run under existing conditions. *Id.*

If San Francisco only eliminates active take of the snake at Sharp Park, but does not provide adequate new habitat for the species to recover, in the 50-year time horizon the species will be lost from Sharp Park, and probably the entire world.

**D. THE LAGUNA SALADA WETLANDS RESTORATION PROJECT MUST CONSIDER THE IMPACTS OF CLIMATE CHANGE AND THE LONG-TERM SUSTAINABILITY OF THE SITE.**

Our best predications about how global warming will impact Sharp Park indicate that existing problems with flooding, drainage, endangered species take, and the construction of the sea wall will only get worse. The City must consider alternatives that plan for the long-term adaptability of Sharp Park to these changes so that the recovery of the San Francisco garter snake can be assured at the site. See Exhibit Y.

Historically Sharp Park included a backbarrier lagoon system. This system contained a barrier sand system that separated Laguna Salada from the Pacific Ocean and protected the lagoon from massive coastal intrusions. However, Alister McKenzie's original golf course design destroyed this protection by laying seven links of golf on the beach. By destroying this protective system, the design unleashed two massive coastal storms that inundated much of Sharp Park with sea water, and destroyed much of the golf course, including the seven beach-side links.

To prevent the ocean tides from inundating Sharp Park, the City built, over time, an illicitly and poorly constructed sea wall at Sharp Park. However, in so doing the City plugged the natural freshwater outflow—Sanchez Creek—and prevented the freshwater that accumulated in the large water shed of which Sharp Park is a part from reaching the ocean. Thus, Sharp Park now annually floods with freshwater.

Sharp Park's sea wall is likely to erode away unless something is done to prepare the area for the impacts of global warming. See Exhibit G. There are essentially two alternatives: armor the sea wall at a cost of \$32 million, or attempt to recreate an adaptive barrier that will be more resilient to the changes that will occur due to climate change and that will help protect the coast from global warming.

Armoring the sea wall could affect the entire beach at Sharp Park, as it may affect beach dynamics and sand movement. An alternative is to try and recreate, after snake and frog recovery efforts have succeeded and the population is secure, the more dynamic barrier lagoon system that likely existed at Sharp Park historically. This alternative is likely to be cheaper, more effective, and more sustainable than placing an unmovable barrier across the mouth of Sanchez Creek that will not be able to adapt to the changes wrought by global warming. See Exhibit X.

Therefore, it is essential that the City consider alternatives that will provide for the long-term sustainability and recovery of the Laguna Salada ecosystem and the San Francisco garter snake. Opportunities to learn more about this possibility will be discussed at a conference in Pacifica, CA at the end of June. See Exhibit Z.

**E. FULL RESTORATION OF SHARP PARK WILL PROVIDE SAN FRANCISCANS WITH RECREATIONAL AMENITIES THAT THEY ACTUALLY DEMAND.**

Full restoration alternative must be considered at Sharp Park for another reason: San Francisco's number one recreational demand is for more hiking and biking trails, while golf finishes 16<sup>th</sup> out of 19 recreational options in the same survey. See Exhibit BB. This is direct evidence that San Francisco is not providing what modern San Franciscans demand from their recreational facilities. The primary reason this is the case is because hundreds of acres of City property are locked into exclusive golf uses created decades ago and have remained static, while San Francisco residents' recreational preferences have changed.

Moreover, the San Francisco Board of Supervisors unanimously passed a resolution ordering the Recreation and Parks Department to consider full restoration alternatives at Sharp Park. This is another indication of the overwhelming public support for San Francisco to reconsider what it supplies to its residents. Even Sharp Park's existing concessionaire has recognized that San Franciscans have little demand for the existing golf course, stating in a proposal to the City that the typical golfer at Sharp Park is a "local resident" of the course. See Exhibit FF.<sup>4</sup>

Under these circumstances, it is imperative for the City to consider and select alternatives at Sharp Park that restore the site and provide recreational opportunities that are compatible with that protection. For example, a full restoration alternative has been proposed at [www.restoresharppark.org](http://www.restoresharppark.org). See Exhibit CC. This restoration proposal would create a community centered model of natural flood control, outdoor recreation, environmental education, and

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<sup>4</sup> The Current concessionaire is on a month to month lease, and this lease should be cancelled as soon as practicable and not renewed. The concessionaire has shown outright hostility to the minimum environmental protections imposed on the golf course to date, by orchestrating a public relations campaign against the environmental protections and also be redesigning the golf course logo and emblem with a biologically inaccurate depiction of a California red-legged frog preventing a golf ball from being in play. This emblem was labeled "Sharp Park Home of the Red Legged Frog," and sold on t-shirts and other memorabilia at the golf course club house. See Exhibit GG. The existing management simply does not have the temperament or character necessary to solve the environmental problems imposed by the golf course. Moreover, as early as 1993, San Francisco's Civil Grand Jury discovered that mandatory investments in the golf course were not being made by the concessionaire. See Exhibit MM. A new concessionaire is needed to investigate and remedy these allegations.

endangered species recovery. These alternatives are feasible and must be considered during the EIR process.

**F. RPD MUST SELECT APPROPRIATE STAFF AND CONSULTANTS TO CONDUCT FULL RESTORATION ALTERNATIVES.**

Currently RPD has an enormous contract with consulting giant TetraTech to perform the Laguna Salada enhancement restoration project. However, full restoration alternatives will require that existing subcontractors with relevant expertise become more involved in the restoration planning process. For example, subcontractor Greg Kamman is the only individual named in the Laguna Salada Wetlands Enhancement Project with enough expertise to prepare serious alternatives for Sharp Park that consider the long-term sustainability of the berm, the original historic conditions of the site, and the dynamic conditions that will be imposed by global warming on the site. Additional experts such as coastal ecologist Peter Baye, coastal engineer and Pacifica resident Bob Batallio of Philip Williams and Associates, Darren Fong of the National Park Service, Carlos Davidson of San Francisco State University, and many other local individuals with site-specific knowledge of Sharp Park and tidal conditions on amphibian and reptile habitats must be consulted, because no one on the team specified by TetraTech have expertise in these areas. Indeed, Karen Swaim, the consulting herpetologist, simply does not have the expertise and understanding of dynamic coastal systems to provide full support for a project of this magnitude.

More importantly, Dennis Murphy and his colleagues are inappropriate consultants for this project. See Exhibit HH. As a preliminary matter, Dr. Murphy is not qualified to consult on these projects, as he is a butterfly expert and not an expert in herpetology, coastal ecology, and climate change. Moreover, Dr. Murphy's objectivity and reputation have come into question because of his relationship with developers. See Exhibit DD. Mr. Murphy simply should not be permitted to consult on this project when local, objective experts with site-specific knowledge of Sharp Park and with relevant expertise are available for the Department.

**G. FULL RESTORATION CAN BE FUNDED BY PRIVATE MITIGATION BANKS OR BY PUBLIC-PRIVATE PARTNERSHIPS.**

Full restoration alternatives must be considered for another reason: both private and public models indicate restoration will provide the City and County of San Francisco with net profits that are greater than any golf amenity that could be create at Sharp Park.

RPD has already received a prospectus from a wetlands mitigation banking company that has proposed to do a fully public wetlands mitigation bank at the site. For the types of wetlands that could be restored at Sharp Park, CalTrans was paying up to \$3.5 million dollars per acre as recently as last year. See Exhibit II. There are approximately 200 acres at Sharp Park that could be developed into wetlands under this model, bringing in a gross revenue of over \$700 million dollars. A portion of these funds would be held in trust to pay for ongoing maintenance and upkeep, another portion would be used to conduct the restoration work. But the remaining funds would be profit to San Francisco: and more profit that Sharp Park Golf Course could provide to the City over the next 100 years. Although mitigation banks have been controversial in the environmental community, a fully public mitigation bank with reasonable constraints on access to the bank would be met with 100% support from the Bay Area's environmental community and would allow San Francisco to be a leader in environmentally sound restoration and financing projects.

Another model is also feasible. At Crissy Field restoration was funded by a collaboration of public grants and private philanthropic donations. This model could also succeed at Sharp Park, and must be explored by the City. These restoration alternatives would also provide revenue for Pacifica. Golf courses are no longer the amenity that developers are designing projects around. See Exhibit NN. Instead, developers are looking for natural resources to use as a center piece and an attraction to their developments. Pacifica already has plans to create a new urbanism city scape at Palmetto Avenue, which currently dead-ends into a chain-link fence on Sharp Park's north side. If Sharp Park were restored and a trail created to link Palmetto Avenue with a restored trail system at Sharp Park, Pacifica would have a recreational amenity unlike any other on the California Coast, one that integrates the best of new urban design with the natural resource amenities that modern communities and tourists are willing to pay a premium for.

#### **H. RESTORING SHARP PARK TO A NATURALISTIC STATE WOULD BE GOOD FOR THE GAME OF GOLF.**

Sharp Park Golf Course is losing money, killing two endangered species, and puts the surrounding community at risk every year when it floods. The status quo simply isn't sustainable at Sharp Park: something must change there. The question is what will Sharp Park become. For the good of the game, Sharp Park Golf Course must close.

Nationwide the game of golf is in decline. See Exhibit J. This decline is more acute in the Bay Area, where we have an unparalleled diversity of recreational opportunities competing with golf for our recreational dollars. See Exhibit K. Currently the Bay Area supplies 6 million more rounds of

golf than golfers demand each year, and this is causing golf courses to close in nearly every Bay Area county. *Id.* Golf courses in Livermore, Forest Knolls, San Francisco, and in Pacifica are already up for sale or are being proposed for conversion to some other use, and the best predictions indicate that more golf courses will suffer this fate before the golf market and our entire economy stabilize.

Sharp Park, by any measure, provides a marginal golf experience. In 2007 the National Golf Foundation gave Sharp Park an “F” grade in nearly every category it measured, including friendliness of staff, conditions of golf carts, the availability of golf amenities, on-course services, the conditions of the golf greens, and overall course conditions. If we continue to subsidize Sharp Park Golf Course to keep it open, under existing market conditions other, better golf courses will close, and the game of golf in the Bay Area will be worse because of it.

Even if we only concern ourselves with San Francisco’s municipal golf courses, it would be best for the game if Sharp Park were to close. Sharp Park loses between \$30,000 and \$300,000 each year from San Francisco’s golf fund alone, and it loses millions more from other taxpayer subsidies. These are losses, not just expenses: revenues from Sharp Park doesn’t even cover the course’s operating costs, let alone the capital and open space projects that are required to keep the golf course functioning. Every dollar that Sharp Park drains from our coffers is another dollar we cannot spend improving the City’s other municipal courses. If we were to take a portion of the resources we spend at Sharp Park and instead spend those resources at Lincoln, Harding, Golden Gate, and our other courses that are in desperate need of attention, the playing conditions at these courses would improve greatly and San Francisco could truly bill itself as a premier golf destination.

There is no merit to the idea that Sharp Park Golf Course today contains some historic or architectural value that is worth preserving. The original McKenzie design was fundamentally flawed to begin with, and built in an inappropriate location to boot. The seven beach side holes were destroyed by two massive coastal storms which brought sea water to the clubhouse within a few years of opening day, and the subsequent construction of the sea wall, Highway 1, and years of deferred maintenance destroyed the rest of McKenzie’s design. In 1972, the entire course was rebuilt by Robert Muir Graves, and golf historians such as Daniel Wexler have therefore concluded that “no appreciable trace of [McKenzie’s] strategy remains in play” at Sharp Park today. See Exhibit JJ.

Some have argued that Sharp Park should be restored not to a naturalistic state, but to McKenzie’s original design. But this is not feasible. To do so would cost between 14-20 million in capital, not to mention the several millions of dollars in permitting and mitigation fees for harming

endangered species. See Exhibit AA. In today's market and in Pacifica's relatively rural, low-density location, that level of capital investment simply cannot be found for such a risky investment. Moreover, regulatory agencies wouldn't permit such an intensive use on endangered species habitats, so any such proposal would eventually be denied. And other communities with publicly owned McKenzie courses have found that the design simply cannot generate revenue: McKenzie's designs too often fail to meet the demands of the modern golfer and new golf technology, and are being redesigned to modernize the course for today's game. Exhibit OO. But most importantly, if McKenzie's original design was recreated, it would suffer the same fate as the original: it would again wash away to sea, only this time more rapidly and violently as climate change causes sea levels to rise and storm intensity and frequency to increase along California's coast. See Exhibit G.

Some golfers will disagree with all of this. Those golfers, content with the status quo, will contest the financial data San Francisco has provided (without providing any alternative financial data); they will claim that McKenzie's design still exists at Sharp Park (without pointing to a single sand trap, let alone a link, that McKenzie would recognize as his handiwork today); they will argue that a private marketing company with a clever advertizing campaign is all that is necessary to reverse the decline in Bay Area golf (even though brining the PGA tour to San Francisco has been unable to do that).

If these golfers succeed keeping Sharp Park open at any price, the game will suffer. The demand simply isn't available to support all of the Bay Area's courses, and a great course will fail to keep Sharp Park alive. It could be Harding Park, or Crystal Springs, or Lake Chabot, or some other course: we currently do not have the data available to know which marginal enterprise will fail with any certainty. But we do know that courses on the margin of profitability simply can't compete in today's market with a golf course, even a terrible one, that is subsidized with hundreds of thousands of dollars in public capital every year.

And if our good courses close because we subsidize our poor ones, how can we expect the game to thrive in the future? The competition is stiff: we have the birthplace of mountain biking (Mt. Tam), the most famous big wave surf in the world (Mavericks), and perhaps most troubling to those who'd like to see more people golfing, we have the birthplace of the iPod and the internet search engine (Silicon Valley), which the data indicates are as responsible for this past decade's decline in outdoor recreation as anything else.

To have any hope for future growth, the game of golf must put its best foot forward against this competition. That means closing golf courses that provide a marginal experience, and reinvesting in our golf courses with more promise. That is why Sharp Park must close: for the good of the game.



Loam Gnome  
<loamgnome@gmail.com>

05/26/2009 01:51 PM

To jessica.range@sfgov.org, bill.wycko@sfgov.org, Dawn  
Kamalanathan <dawn.kamalanathan@sfgov.org>,  
cc jared.blumenfeld@sfgov.org, dennis.kern@sfgov.org, Sean

bcc

Subject Request for bike friendly TRAILS in the NAP Recreational  
Trail EIR.....from SF Urban Riders

Attention SFRPD, NAP, SF Planning Dept. and any other interested parties involved in the Recreational Trails process

SF Urban Riders is a Non-Profit 501c3 whose goal is to create healthy off road cycling recreation for all users, and encourage youth opportunities.

We represent a growing number of recreational cyclists who are asking in unison to Please ADD multi use trails, off road bicycle trails, single track trails, and bike skills areas to the EIR scope of any projects in our larger parks and open spaces.

Off Road cycling is a growing contemporary activity that provides healthy recreation accessible at any level of entry, and appeals to a wide demographic. Trails are also the cheapest form of recreational improvement that can be made because they are sustainably designed, then constructed of natural materials by a large volunteer effort. There is many available federal funding sources that favor the inclusion of bicycle trails. SF Urban Riders would make a good partner with SFRPD on many levels and improve the overall quality of our parks.

For More Information on why sustainable multi use access is necessary please feel free to review our Master Plan which is available online:

<http://sfurbanriders.org/wordpress/lead-story/unlease-the-proposal/>

ADD BIKE TRAILS, SINGLE TRACK TRAILS AND BIKE SKILLS AREAS TO THE NAP EIR.

Sincerely,

Dan Schneider  
SF Urban Riders  
415-298-2504

[www.sfurbanriders.org](http://www.sfurbanriders.org)



San Francisco Dog Owners Group

RECEIVED

MAY 26 2009

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
RECEPTION DESK

**PUBLIC COMMENT ON INITIAL STUDY SIGNIFICANT NATURAL  
RESOURCE AREAS MANAGEMENT PLAN (SNRAMP)**

**May 26, 2009**

Bill Wycko  
San Francisco Planning Dept.  
Natural Areas Management Plan  
1650 Mission St, Suite 400  
San Francisco, CA 94103

Dear Mr. Wycko,

The San Francisco Dog Owners Group (SFDog) is a registered 501(c)(3) non-profit dedicated to responsible dog ownership and preserving off-leash access in our parks. We are active in our neighborhood parks, having organized park clean-ups and dog behavior/training workshops in the parks, and distributed flyers on "Park Petiquette", dog training, preventing poisoning, and emergency preparedness for pets. We have over 900 dues-paying members and our listserves and website routinely reach thousands more.

SFDog has significant concerns with the Initial Study for the EIR for the Natural Areas Program as prepared by Tetra Tech. I have outlined our requests for improving the analysis to be undertaken for a quality EIR in the following pages. Briefly, our concerns include errors and omissions in information provided, obvious environmental impacts that are not addressed, biased descriptions of research, and policies based on anecdotes rather than rigorous scientific studies. Unfortunately, because of these errors and omissions, this document reflects poorly on the SF Planning Dept, as will any EIR based solely on the recommendations in this poorly crafted Initial Study.

The Natural Areas Program and its Management Plan have been one of the Recreation and Park Department's most controversial endeavors, and you can be sure that advocates on all sides will pore over the full EIR with an eye toward possible litigation. Please expand the scope of the EIR to include the suggestions described in this public comment. If you have any questions, I would be happy to discuss this comment with you in more detail. Thank you.

Sincerely,

Sally Stephens  
Chair, SFDog

# **PUBLIC COMMENT ON INITIAL STUDY SIGNIFICANT NATURAL RESOURCE AREAS MANAGEMENT PLAN (SNRAMP)**

**San Francisco Dog Owners Group (SFDOG)  
May 26, 2009**

The Initial Study for the SNRAMP EIR has several glaring problems. These must be addressed if the full EIR is to have any validity.

SF Animal Care and Control estimates that 1/4 to 1/3 of the households in San Francisco are home to at least one dog (the national average is 1/4 of households). San Francisco consistently ranks as one of the most dog-friendly cities in the country and it is therefore likely that there are more households with dogs in San Francisco than the national average. There are therefore 130,000 to 150,000 dogs in San Francisco. People with dogs are the largest group of park users in the city; most visit parks with their dogs several times every day, rain or shine.

Dogs do not go to the parks by themselves; people bring them to parks. Attempts to restrict access by dogs to areas within or adjacent to natural areas are essentially attempts to keep a large group of people from enjoying those areas. The net effect of the Management Plan will be to deny access by a small group of people to a large group of people who simply want to visit their neighborhood parks.

Note that, of the 31 city parks with natural areas mentioned in the 2006 Management Plan, NAP claims the entire park (100%) in 17 of them. In an additional 10 parks, NAP claims over 50% of the park acreage. The four with fewer than 50% of their land claimed by NAP are: Golden Gate Park (3% of land is claimed by NAP), Pine Lake (28%), Buena Vista Park (17%), and Golden Gate Heights Park (13%). To be fair, not all NAP-claimed land will have significant restrictions on access. But a majority of NAP land (57%) will have significant restrictions (MA-1 and MA-2), with people restricted to paths only and dogs restricted to on-leash only, if allowed at all. In 8 parks, all land in the natural area will have significant restrictions on access (all the natural area is classified as MA-1 or MA-2). The NAP Management Plan keeps people out of 1/3 of the city's parkland. In some cases, this denial of access will be to the only park within easy walking distance in the neighborhood.

SFDOG has the following specific concerns about the Initial Study and the full EIR for the NAP:

**THERE IS NO SCIENTIFIC CONSENSUS TO SUPPORT THE BASIC PREMISE BEHIND GR-8 – THAT DOGS ARE HARMFUL TO PLANTS AND WILDLIFE. THERE IS THEREFORE NO REASON TO RESTRICT DOGS IN NATURAL AREAS, NO REASON FOR GR-8.**

It is a basic gospel of the Natural Areas Program and its supporters, and therefore embedded in the management plan that is the subject of this EIR, that dogs, and in particular off-leash dogs, are harmful to plants, birds, and other wildlife. These claims are often stated as fact. However, the reality is that there is **no scientific consensus that off-leash dogs have a significant impact on bird and wildlife populations**. Some studies have shown an impact. But others have found no significant effect on bird and wildlife diversity and populations.

A recent study by Forrest and Cassady St. Clair (2006) studied the effects of dogs on diversity and abundance of birds and small mammals at 56 sites in urban parks in Edmonton, Alberta. Half of the sites were visited by off-leash dogs, half were on-leash or no dogs. City officials reported the on-leash sites had high public compliance with leash laws. Before beginning the study, the researchers fully expected "that designated off-leash

areas would represent comparatively poor habitat and would negatively influence diversity and/or abundance of birds and small mammals relative to nearby habitat where dogs were required to be leashed within the same urban park system.”

To their surprise, they discovered that **whether a site was on- or off-leash had “no measurable effect on the diversity or abundance of birds and small mammals.”** This lack of difference between on- and off-leash sites was seen even when they considered only those species that appeared to be breeding, or only those species that nested on the ground or in low shrubs.

This study may be more relevant to the NAP than other studies of dog impacts on diversity because both the NAP and the parks studied in Edmonton are urban parks. Indeed, one possible explanation the researchers give for why there was no observed difference is that **“wildlife, particularly birds, in suburban and urban areas exist there because they are fairly tolerant of moderate levels of human activity.”**

Compare this to studies cited in a report, commissioned by the NAP to comment on the management plan, by Huntsinger and Bartolome (2005; available online at: [http://www.parks.sfgov.org/wcm\\_recpark/NAP/scientificreview\\_huntsinger.pdf](http://www.parks.sfgov.org/wcm_recpark/NAP/scientificreview_huntsinger.pdf)) that purports to prove negative impacts from dogs. They cite a report on dogs’ impacts on Rocky Mountain wildlife (not urban) and on gazelles (definitely not urban). It is not clear whether other studies cited refer to birds and other wildlife in urban parks or not. The city of San Francisco is the second most densely populated city in the US (only Manhattan is denser). Our parks are not remote, pristine wildernesses. **When deciding the relevance of any study of the impacts of dogs on plants and wildlife to the NAP, the full EIR must consider whether the study took place in an urban park where wildlife is likely to be more tolerant of dogs and people. If not, the study’s relevance to the NAP must be discounted.** The Huntsinger and Bartolome review makes no attempt to sort out studies done under conditions like those in NAP areas (urban parks) from those done in remote wilderness areas. Therefore, its conclusions cannot be used as a basis for the restrictions proposed in GR-8.

In addition, the sections of the Huntsinger and Bartolome review that deal with dogs are full of “anecdotal accounts” of negative impacts. The problem is that **anecdotal accounts are not reliable and cannot be used as the basis for public policy.** For example, an underlying assumption in the NAP Management Plan used to justify on-leash restrictions on trails is that off-leash dogs on trails roam widely and frequently disturb plants, wildlife, and other park visitors. However, a study by Beckoff and Meaney (1997), published in a peer-reviewed journal, tested this assumption and found that it is not true. Beckoff and Meaney observed the behavior of dogs in six parks in and around Boulder, Colorado. They positioned themselves at various vantage points along trails and recorded everything they saw. They also followed individual dogs during the entire time they were in the park, recording everything the dogs did. Finally, they gave a questionnaire to all park visitors, obtaining more responses from non-dog owners than dog owners.

Their data showed that off-leash dogs generally did not travel far off trail, and when they did, it was for short periods of time. “There is no doubt that *some* dogs go off trail for various amounts of time and that *some* dogs do occasionally disturb people, wildlife, and habitat. However, compared to people, dogs did not seem to do much damage to vegetation or bodies of water, and they only rarely chased wildlife... **People disrupt wildlife more frequently than dogs, and people cause more damage to vegetation and to bodies of water.**”

Beckoff and Meaney note that: “In Boulder and perhaps in other areas, **reports of unruly dogs seem to attract a lot of attention, but of course, people do not report when dogs are well-behaved.**” It is human nature to remember when something bad happens, but not to notice all the times nothing bad occurred. That’s not a problem unless you take a remembered bad incident and assume it is “typical.” That is the basic flaw in anecdotal accounts, which really say more about the biases of those making the reports than they say about what is really happening.

In a recent study that tested another common assumption, Warren (2007) tested whether recreational disturbances changed the feeding behavior of the Western Snowy Plover at Crissy Field and at two sites at Point Reyes. Warren admits in the study that she fully expected the data to show that as the frequency of disturbance increased, the birds would spend less time actively foraging for food and more time alert. Instead, she found no significant relationship between feeding behavior and direct disturbance by people recreating on the beach. What other assumptions about effects of disturbances by dogs and people will be similarly disproved when studies are done that put them to the test? How much bad public policy will have been set based on these erroneous assumptions?

**THE FULL EIR MUST INCLUDE A COMPLETE, UNBIASED ANALYSIS OF ANY SCIENTIFIC LITERATURE WITH REGARD TO DOGS IN PARKS. SPECIAL ATTENTION MUST BE PAID TO STUDIES OF THE IMPACTS OF DOGS CONDUCTED IN URBAN PARKS (COMPARABLE TO NAP), AS OPPOSED TO STUDIES MADE IN WILDERNESS AREAS WHERE WILDLIFE IS NOT ACCUSTOMED TO PEOPLE AND DOGS (NOT COMPARABLE TO NAP).**

**THE FULL EIR MUST CAREFULLY LOOK FOR AND CONSIDER BIAS IN DATA USED BY THE NAP TO JUSTIFY THE RESTRICTIONS IN GR-8.**

In May 2006, the Point Reyes National Seashore (PRNS) management claimed that an oyster farm in Drakes Bay was harming marine wildlife and causing significant negative impacts on the environment and, therefore, should be closed. A PRNS report stated that the oyster farm workers disturbed seals, causing a huge decline in seal population, and that sediment from oyster feces was harming eelgrass beds. Therefore, the oyster farm did not belong in a national seashore. Corey Goodman, a microbiologist at UC Berkeley, member of the National Academy of Sciences, and a former Chair of the National Research Council's Board of Life Sciences, analyzed the raw data used in the studies cited by PRNS staff and found that the data did not support nearly every negative impact claimed.

On the September 27, 2007 episode of the KQED-FM program "Quest", Goodman said, about the published claims by PRNS staff: "Essentially every one of the scientific claims that they made are refuted by their own scientific data.... They have made intentionally misleading claims, statements about data that are untrue, claims of cause and effect that are untrue. I think this is serious because they have misused science to mislead the public."

An Interior Dept's Inspector General report and a second report by the National Academy of Sciences agreed with Goodman's analysis. Yet, convinced that the oyster farm did not belong there, PRNS staff misrepresented their data to support that conclusion.

Similar concerns have been raised about government claims of impacts of dogs on wildlife in the context of native plant restoration. For example, two reports (in 1996 and 2006) by Daphne Hatch, an employee of the Golden Gate National Recreation Area, argued that off-leash dogs should be restricted to protect Western Snowy Plovers at Ocean Beach (in the context of restoration of Ocean Beach). The 1996 Report states that on 15 occasions, at least 100 plovers were "inadvertently disturbed" by dogs running on the beach, and compared that to the 48 plovers inadvertently disturbed by people on the beach. However, if you look at the data, you see that the surveys that showed disturbances by people were a subset in time of those involving dogs. Indeed, the disturbances from people were noted in about half the recording time (24 hours of observations) as that devoted to studying dogs (40 hours). Had the people been observed for an equally long period of time, the numbers of disturbances caused by dogs and people would have been nearly the same. Other data presented in both studies

show no impact of off-leash dogs on the numbers of plovers. Yet the conclusion drawn in the report is that off-leash dogs have to be restricted to “protect” the plovers.

**THE FULL EIR MUST RE-ANALYZE ANY DATA PROVIDED BY NAP (ESPECIALLY DATA NOT PUBLISHED IN A PEER-REVIEWED JOURNAL) TO ENSURE THAT CONCLUSIONS AGAINST DOGS ARE ACTUALLY SUPPORTED BY THE DATA. THE FULL EIR MUST AVOID A SITUATION SIMILAR TO THE ONE IN POINT REYES, IN WHICH GOVERNMENT RESEARCHERS MISREPRESENTED SCIENTIFIC RESULTS TO BOLSTER A CASE AGAINST AN OYSTER FARM.**

**THE FULL EIR CANNOT CONSIDER CLOSING THE LAKE MERCED DOG PLAY AREA AS CALLED FOR IN THE INITIAL STUDY (LM-7a) BECAUSE RPD MADE THIS AN OFFICIAL OFF-LEASH AREA YEARS AGO AND PROMISED IT TO THE DOG-OWNING COMMUNITY. EVEN NAP HAS ACKNOWLEDGED THIS STATUS PUBLICLY. THE FULL EIR MUST CORRECT INCORRECT STATEMENTS ABOUT THE RPD DOG POLICY MADE IN GR-8b.**

The Initial Study says (page 36): “Due to the CCSF moratorium on new DPAs, the Lake Merced DPA couldn’t be relocated to a new location, so it would only be removed. Restoration of the site would continue, following the removal of the DPA.” The Notice of Preparation of an EIR for the Natural Areas Management Plan states that the final draft plan was published in February 2006. That is the plan that will be studied in the full EIR. However, the 2006 Management Plan says about the Lake Merced DPA in Recommendation LM-7a (page 6.1-18): “The SFRPD and the Dog Advisory Committee should consider relocating the DPA to a different location. In the meantime, this DPA can remain open, but impacts should be monitored. If use levels increase during this time such that impacts to breeding bird habitat are detected, signs and other mitigations should be implemented.” There is NO mention of closing the DPA. Monitoring and mitigation can be considered in the full EIR because they are mentioned in the 2006 Management Plan. Closing the DPA is NOT an option that can be considered in the full EIR for the Management Plan because it is not mentioned in the Management Plan. This must be corrected in the full EIR.

In addition, the 2002 RPD Dog Policy sets forth a public process to create or to close a DPA, which includes evaluation by the Dog Advisory Committee (DAC). DPAs cannot be closed without that public process. It is especially true that a DPA cannot be closed because a consultant doing an Initial Study or an EIR decides it should be. The DAC was “sunset”-ed in February 2007 and no public process to replace it has been announced by RPD. Until a replacement public process to close DPAs that does not include the DAC is devised by RPD, there is no legal way to close a DPA. While there is a moratorium on creating new DPAs as RPD conducts system-wide DPA planning, there is also a moratorium on closing existing DPAs until the system-wide planning is completed. Therefore, **closing the Lake Merced DPA cannot be considered as part of the Management Plan nor as part of the full EIR.**

It is not the role of the Initial Study to CHANGE what is in the draft 2006 Management Plan as described above. Nor is it their role to add a NEW natural area, # 32 the Everson/Digby lots (page 46 of the Initial Study) that is not in the 2006 Management Plan. The public has not been informed that the area currently used as neighborhood open space is now a “natural area” with who knows what restrictions attached to its use.

**WHEN CONSIDERING ANY IMPACTS OF DOGS IN PARKS, THE FULL EIR MUST TAKE INTO ACCOUNT THE DIFFERENCE BETWEEN “FREE-ROAMING” AND “OFF-LEASH” DOGS.**

“Free-roaming” dogs are dogs that are running WITHOUT any human oversight. Examples of free-roaming dogs would be a dog whose owners did not know that it had escaped from a backyard, or a feral dog that lives without any human control. “Off-leash” dogs are dogs that are running WITH human oversight. Their guardian is nearby and controls them with voice commands. Studies that discuss impacts of free-roaming dogs CANNOT be used to indicate similar impacts from off-leash dogs. This distinction must be considered by the full EIR when considering any reported impacts of dogs in parks.

**THE EIR MUST ADDRESS THE NEGATIVE ENVIRONMENTAL IMPACT ON TRAFFIC (E-5a), AIR POLLUTION (E-7b), AND GLOBAL WARMING (E-7f) IF AREAS THAT ARE CURRENTLY OFF-LEASH ARE CLOSED TO PEOPLE WITH DOGS.**

According to the Draft Management Plan for the Natural Areas Program (NAP), approximately 80% of the currently legal off-leash areas in San Francisco city parks are located either within or adjacent to areas subsequently claimed by the NAP (note that the off-leash areas were there first). The Plan calls for the immediate closure of parts of the currently off-leash areas in two parks (a reduction of 29% in Bernal Hill and of 14% in McLaren Park; note that the plan states that some of the area in Bernal Hill to be closed is steep and inaccessible and therefore is excluded from their claimed reduction of 17%). These two closures will reduce the total acreage in city parks available for off-leash recreation by approximately 15%. In addition, the Plan calls for monitoring of off-leash areas in Buena Vista Park, Golden Gate Park, Lake Merced, and McLaren Park. Should NAP claim that dogs are causing any problems, NAP will call for the closure of all or parts of those areas. Finally, the Plan calls for expanding the most-sensitive MA-1 areas into less-sensitive MA-2 and even MA-3 areas when funding becomes available. Thus, an off-leash area that is currently adjacent to an MA-3 area, and therefore, not under any restrictions, could find itself, in the future, adjacent to an MA-2 or even an MA-1 area. Should NAP determine that dogs in the off-leash area have a negative impact on newly adjoining MA-1 and MA-2 areas (or even on an MA-3), they can call for closure of the off-leash area.

Clearly, 80% of the currently legal off-leash areas in San Francisco’s city parks are at risk of closure because of the potential activities of the NAP as outlined in the NAP Management Plan. What will happen to the hundreds of thousands of people with dogs who are shut out of their neighborhood park if any or all of the 80% of off-leash areas are closed? They will be forced to drive across town to the remaining legal off-leash areas. Public transit is not an option for people with dogs. MUNI buses and trains forbid dogs during rush hours before and after work, the primary times that people are walking and playing with their dogs in parks. Forcing large numbers of people to drive across town to use the remaining legal off-leash areas will increase traffic and air pollution, and will contribute to global warming. The negative impact on the environment of this driving must be acknowledged and addressed in the full EIR.

The full EIR must consider not only the impacts on traffic, air pollution, and global warming of the proposed closure of off-leash areas in McLaren Park and Bernal Hill, but also the impacts of closing the off-leash areas in the parks specifically slated for monitoring, as well as the impacts of closing all 80% of the legal off-leash areas within or adjacent to areas claimed by the NAP.

**THE ENVIRONMENTAL IMPACT ON THE REMAINING OFF-LEASH AREAS IF PEOPLE WITH DOGS ARE FORCED OUT OF LEGAL OFF-LEASH AREAS WITHIN OR ADJACENT TO NATURAL AREAS MUST BE CONSIDERED IN THE FULL EIR.**

Any large group of park users that is concentrated into a small area – whether it be soccer players, kids with Frisbees, or people with dogs – can cause some damage to those areas. The full EIR must look at the impact on the remaining legal off-leash areas of serious overuse if closures of current off-leash areas are demanded by NAP because of the Management Plan.

In addition, tens of thousands of people with dogs walk off-leash in the Golden Gate National Recreation Area (GGNRA) every day, including Fort Funston, Ocean Beach, and Crissy Field. Many of these people live adjacent to these areas; indeed, proximity and ease of access for dog walking is one reason people buy homes in neighborhoods adjacent to the GGNRA. However, the GGNRA is considering severely restricting off-leash access to the lands under its control. Should the GGNRA's restrictions occur, thousands more people with dogs could be forced to use the legal off-leash areas in San Francisco city parks. The cumulative impact of closing off-leash areas because of the NAP and the GGNRA must be included in the full EIR.

**THERE ARE ALSO SEVERAL NON-DOG-RELATED ISSUES THAT SHOULD BE INCLUDED IN THE FULL EIR.**

**THE FULL EIR MUST CONSIDER THE NEGATIVE IMPACTS ON WIND (E-8) AND EROSION (E-13) OF REMOVAL OF TREES AND NON-NATIVE PLANTS FROM NATURAL AREAS.**

The Management Plan calls for replacing trees removed from natural areas with other trees, but says the replacement trees may not be planted at the same site. Also, new trees will not be the same size as the ones removed, for many years, if ever. Many trees were planted in parks to provide windbreaks not only for the parks, but also for the homes immediately adjacent to the parks. Removing these trees will remove the windbreaks, with potential property damage to the homes.

Over the years, homeowners and park officials planted many non-native plants, especially ice plant, because they were the only plants that would stabilize San Francisco's sandy hills. Native plants frequently require drifting sand to thrive, and they, therefore, were not effective at stabilizing the hills. Land within many natural areas is fairly steep. Removing the ice plant and other non-native plants that have stabilized the hills for decades will result in increased erosion in city parks.

For example, NAP plans for all four parks in the Golden Gate Heights neighborhood (Grandview, Rock Outcrop, Golden Gate Heights Park, and Hawk Hill) call for "scattered, open sand". These parks are located near the top of several hills, on steep, west-facing slopes with nothing to block strong ocean winds. Even with the ice plant that has covered the areas for decades, drifting sand still blocks streets, clogs sewers, and damages nearby homeowners' property. Clearly, removing the stabilizing plants and creating areas of "scattered, open sand" will cause significantly more erosion and damage.

NAP staff have stated in public meetings that the program has no "legal" responsibility for damage to homeowners' property that result from their actions (e.g., removing ice plant that stabilized sand resulting in drifting sand damaging a park neighbor's backyard, as has happened around Grandview Park). In a scientific review of the NAP Management Plan, reviewer Peggy Fielder, one of the paid authors of the original management plan, was asked: "Have the secondary consequences of management activities been adequately identified and

addressed (e.g., effects on healthy trees, forests, plants, animals, birds, wind patterns, erosion, restrictions, use of herbicides, and the necessity of removing invasive animals)?” Fielding replied: “Probably not, but this is not a function of the plan.” These secondary consequences **MUST** be considered during the full EIR, especially the effects on windbreaks and erosion, and on the PEOPLE who live in homes next door to a city park!

Natural areas do not occur in a vacuum. Because our city parks are located within a densely populated urban city, the effects of NAP management decisions, such as removing non-native trees or plants that stabilize hillsides, extend beyond the public areas of the park itself. It is not sufficient to only consider wind and erosion within the park. The full EIR **MUST** evaluate the physical effects (not the just legal) that include erosion, sand and wind effects on homeowners and property adjacent to the parks that contain natural areas.

**THE FULL EIR MUST CONSIDER THE NEGATIVE IMPACT OF CREATING HABITAT IN NATURAL AREAS THAT ENCOURAGES MOSQUITO BREEDING, INCREASING THE PUBLIC HEALTH RISK OF WEST NILE VIRUS.**

Many of the plans for individual natural areas call for creating ponds and standing water sources. These habitats are prime mosquito breeding areas. The Initial Study only mentions “small water features” as being potential mosquito breeding sites. However, larger ponds are also important breeding sites. The impact on public health of mosquito breeding at ALL ponds in ALL natural areas **MUST** be addressed in the full EIR. The impact of increasing the size and number of ponds at each site **MUST** be considered. This is an especially important issue at Sharp Park, one of only four places in San Mateo County where the threat of mosquito breeding is high enough to warrant helicopter spraying of larvicide in addition to ground applications. Increasing the size and number of ponds for frog habitat at Sharp Park will significantly increase the threat of mosquito breeding there. The impact of an increased use of BT, a biological control agent, to control mosquito breeding in larger or more ponds must be considered in the full EIR.

**THE NEGATIVE IMPACT ON HOMES ADJACENT TO NATURAL AREAS FROM PRESCRIBED BURNING SHOULD THOSE BURNS GET OUT OF HAND MUST BE CONSIDERED IN THE FULL EIR (E-15h).**

The Initial Study states (page 11) that NAP “no longer is proposing prescribed burning would not occur. The SNRAMP will be updated to reflect this change.” The full EIR is authorized to study the 2006 Management Plan. Significant changes to the 2006 Management Plan cannot be made before the EIR is done. Therefore, the change referred to in the Initial Study cannot be made. In any event, the full EIR **MUST** consider the potentially catastrophic impact of prescribed burns on adjacent homes, as well as parkland, should a burn get out of hand.

**THE FULL EIR MUST INCLUDE THE IMPACTS ON AESTHETICS OF POOR MAINTENANCE BY NAP STAFF AND THEIR VOLUNTEERS. THE FULL EIR MUST ALSO INCLUDE THE EFFECTS OF POOR MAINTENANCE ON THE NEED FOR MORE HERBICIDES IN NATURAL AREAS.**

Any full EIR must consider whether or not the natural areas can be maintained as described in the management plan. In most parks, the 2006 Management Plan allocates fewer than 20 days/year for

planting/maintenance of the natural areas. In 16 of the 31 natural areas in the 2006 Management Plan, the total maintenance planned is 10 or fewer days each year. There are countless stories of volunteers who have spent long hours planting native plants in NAP areas, only to see absolutely no maintenance performed once the plants are there. Without maintenance, the plants die, creating unsightly vistas of dead and dying plants.

In addition, poor maintenance allows non-native vegetation to grow back, requiring repeated applications of herbicides to get rid of the unwanted non-natives.

The full EIR MUST consider the benefits of scaling back the program to a few areas that can be well maintained, as opposed to the current plans to take over one-third of San Francisco's city parkland for the program, too much area to be adequately maintained by NAP staff. The Management Plan is much more ambitious in the amount of work to be done annually, than NAP has demonstrated it has the capacity to actually DO on a consistent basis. It would be preferable to have a workable management plan that is achievable within the resources of the city and the volunteer commitment made to NAP, than to have a utopian plan including monitoring and research goals that are not attainable.

Finally, with regard to aesthetics... Who decides what is aesthetically pleasing? For many people, brush piles used in natural areas look like accumulations of trash and are aesthetically unpleasing. For many people, shaded areas with tall, non-native trees are aesthetically pleasing, while areas without tall trees are less so. People like to see their parks green, not brown half the year. How will the different aesthetics of what a park should look like be included in the full EIR? Will the full EIR include a study of what San Francisco residents want/like to see in their parks? How will people, who are part of the environment, be part of the EIR evaluation?

--end--

**THE STUDIES REFERENCED IN THIS PUBLIC COMMENT ARE:**

- 1) **“Effects of dog leash laws and habitat type on avian and small mammal communities in urban parks”, Andrew Forrest, Colleen Cassady St. Clair, *Urban Ecosyst* (2006) 9, p. 51-66**

Abstract: “Remnant natural areas within urban settings can act as important refuges for wildlife, substantially increasing local biodiversity. However, habitat suitability for these species is potentially affected by human recreational activities including the presence of free-running dogs. To compare the diversity and abundance of songbird and small mammal communities between areas with bylaws that require, or do not require, dogs to be leashed, point counts and live-trapping surveys were conducted in three habitat types (deciduous, coniferous, and meadow) in the river valley parks of Edmonton, Alberta. Among birds, there was no difference between areas with different leashing bylaws in species diversity for any of the three habitat types. Similarly, there was no difference in bird diversity for a subset of species that were plausibly breeding at these sites. However, higher bird diversity was recorded in deciduous and coniferous sites than in meadow sites, regardless of leash designation, probably as a function of the horticultural practice of mowing meadows. Among both birds and small mammals, there was no difference in the abundance of individuals as a function of leashing bylaws. Our results suggest that off-leash dogs have no effect on the diversity or abundance of birds and small mammals in urban parks, but it is also possible that other factors, such as leash law compliance, reduced or obscured the effects of off-leash dogs in this study.”

Before beginning the study, the researchers “hypothesized that designated off-leash areas would represent comparatively poor habitat and would negatively influence diversity and/or abundance of birds and small mammals relative to nearby habitat where dogs were required to be leashed within the same urban park system... [On-leash sites] were believed by city officials to have high public compliance with leash laws. Off-leash sites were either in officially designated off-leash areas or, in two cases, in areas that were designated as on-leash but were known to experience frequent use by off-leash dogs and their owners.” (p. 53)

Researchers conducted bird surveys in all 56 sites (half off-leash, half on-leash) a total of three times between May and July 2002. Each survey involved a 5-minute, 100 m, fixed radius point count, followed by a 5-minute playback of a black-capped chickadee mobbing call (known to attract several bird species and used to increase detection of less vocal species). A 5-minute post-playback point count concluded the survey. Researchers recorded all birds that were seen or heard during the 15-minute period. They only counted birds if they interacted with the environment (that is, they did not count birds flying over the survey site). Small mammals were live-trapped at a randomly selected subset of 32 of the original 56 sites.

They found that “Designation of sites for dogs to be on- or off-leash had no measurable effect on the diversity or abundance of birds and small mammals within the sites that we surveyed in the Edmonton River valley. There was a similar lack of difference in bird abundance when we restricted analyses to only those species that appeared to be breeding, only those species that nest on the ground or in low shrubs, and only the most abundant species.” (p.61)

2) **“Interactions Among Dogs, People, and the Environment in Boulder, Colorado: A Case Study”, Marc Bekoff and Carron A. Meaney, *Anthrozoos*, (1997), 10(1), p. 12-31.**

Abstract: “From September 1995 to April 1996 we studied interactions among dogs, people, and the environment in Boulder, Colorado, Data on behavioral disturbances by off-leash dogs who were accompanied by a person were collected with respect to dog-dog and dog-human interactions, dog-wildlife encounters, dogs trampling vegetation, and dogs entering and disturbing bodies of water. A questionnaire also was administered. Behavioral data showed that off-leash dogs generally did not travel far off trail, that when they did it was for short periods of time, and that they rarely were observed to chase other dogs, disturb people, chase wildlife, destroy vegetation, or enter bodies of water. Results from analyses of the questionnaire (skewed toward non-dog owners) showed that dog owners and non-dog owners agreed that people were more disruptive to the environment than dogs and that unruly people were more problematic than unruly dogs. We conclude that the well-being and interests of dogs should not summarily and dismissively be compromised when dogs and people attempt to share limited space that can be used by all parties for recreational purposes. Indeed, a higher percentage of people reported that the quality of dogs’ experience of the outdoors would be compromised more than their own enjoyment if dogs could not walk off-leash in areas where this is currently permitted. The methods used and the results from this case study can serve as a model for other locations in which dogs and people compete for limited spatial resources.”

In this study, the researchers observed the behaviors of dogs in six parks in and around Boulder. They positioned themselves at various vantage points along trails and recorded what they saw. They also followed individual dogs during the entire time they were in the park, recording everything they saw the dogs do. They administered a questionnaire they designed, with the help of professional pollsters, to all visitors entering the parks being studied. More non-dog owners (53.2%) responded to the questionnaire than did dog owners (46.8%).

“There is no doubt that *some* dogs go off trail for various amounts of time and that *some* dogs do occasionally disturb people, wildlife, and habitat. However, compared to people, dogs did not seem to do much damage to vegetation or bodies of water, and they only rarely chased wildlife... People were more disruptive than were dogs, and when dogs did go far off trails they often were lured off by people [e.g., by chasing a thrown stick]...” (p.26) “People also reported (and direct observations confirmed the fact) that people disrupt wildlife more frequently than dogs, and people cause more damage to vegetation and to bodies of water.” (p. 27)

3) **“Recreation Disturbance Does Not Change Feeding Behavior of the Western Snowy Plover”, Megan Warren, UC Berkeley Environmental Sciences 196, Senior Research Seminar, May 7, 2007**

Abstract: “The Western Snowy Plover (*Charadrius alexandrinus nivosus*) is a small shorebird that has many scattered wintering populations along the Pacific Coast of the United State, including several in the Bay Area. This species has been listed as threatened since 1993 under the federal Endangered Species Act of 1973. For this study I measured disturbance rates, types, plover responses and feeding time in three different sites in the San Francisco Bay Area to explore the link between recreation disturbance and feeding behavior. I predicted that as frequency of disturbance

increased, the birds would spend less time actively foraging and more time alert. However, data showed no significant relationship between feeding behavior and direct disturbance by human recreators. Instead, I now predict that recreation has a more indirect effect on the western snowy plover feeding behavior. Future research should focus on indirect effects of recreation, such as habitat disturbance and food source quality.”

Warren observed plover behavior at Crissy Field (high-use recreational site), Limantour Beach (medium-use recreational site), and Abbott’s Lagoon (low-use recreational site). Surveys were made of birds’ responses to recreational activity in four categories – no response, mild response (causing a resting plover to stand), moderate response (causing a plover to stand up and/or walk away), and major response (causing the plover to flush). Feeding behavior surveys quantified how the plovers budgeted their time during the dusk feeding period. Plovers were observed: 1) searching for food, defined as movement along the shoreline with its head down visually scanning for prey; 2) actively foraging, defined as head down with its beak in the sand eating the prey; and 3) time spent alert, defined as a bird standing still with its head up visually scanning the beach. A linear regression was used to test the relationship between frequency of disturbance and foraging, alert and searching time.

“The Crissy Field study did not provide any relevant results, however, the data from the two Point Reyes study sites do not support the hypothesis that western snowy plovers in more heavily disturbed areas devote less time to actively foraging and more time to being alert... These results suggest that direct recreation disturbance is not as significant as earlier thought, and that links between recreation and western snowy plover feeding behavior are more subtle.” (p. 9)

## Effects of dog leash laws and habitat type on avian and small mammal communities in urban parks

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**Abstract** Remnant natural areas within urban settings can act as important refuges for wildlife, substantially increasing local biodiversity. However, habitat suitability for these species is potentially affected by human recreational activities including the presence of free-running dogs. To compare the diversity and abundance of songbird and small mammal communities between areas with bylaws that require, or do not require, dogs to be leashed, point counts and live-trapping surveys were conducted in three habitat types (deciduous, coniferous, and meadow) in the river valley parks of Edmonton, Alberta. Among birds, there was no difference between areas with different leashing bylaws in species diversity for any of the three habitat types. Similarly, there was no difference in bird diversity for a subset of species that were plausibly breeding at these sites. However, higher bird diversity was recorded in deciduous and coniferous sites than in meadow sites, regardless of leash designation, probably as a function of the horticultural practice of mowing meadows. Among both birds and small mammals, there was no difference in the abundance of individuals as a function of leashing bylaws. Our results suggest that off-leash dogs have no effect on the diversity or abundance of birds and small mammals in urban parks, but it is also possible that other factors, such as leash law compliance, reduced or obscured the effects of off-leash dogs in this study.

**Keywords** Urban parks · Dogs · Birds · Small mammals · Wildlife · Diversity · Leashing by-laws

### Introduction

In developed countries of the world, 75% of humans already live in urban areas and the worldwide urban population is estimated to be increasing by 175 000 people each day (UN,

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2003). As urban areas expand to accommodate increases in both the human population and urbanization, remaining natural areas are giving way to further anthropogenic development (Searns, 1995). Increasing development in and surrounding cities heightens the value of remaining natural areas, which frequently occur in river valleys and ravines, and large areas of this sort may be capable of supporting several native wildlife species. In the city of Edmonton, Alberta, the North Saskatchewan River valley and several adjacent ravines comprise an enormous urban park system of 7400 ha, renowned as being the largest contiguous area of urban parkland in North America. Much of this area remains in a relatively natural state and appears to sustain a high diversity of wildlife (Mowat, 1993). In the past, city planners have developed park and trail systems within the river valley for a variety of human recreational uses. However, more recently and more generally, urban natural areas are recognised by both city planners and ecologists for their value in the conservation of biodiversity (Clergeau et al., 1998; Fernandez-Juricic and Jokimaki, 2001).

Protecting the biodiversity within urban parks requires that city planners carefully manage the variety of competing pressures on these areas. These pressures arise from high levels of human visitation associated with a number of recreational uses, the presence of both official and unofficial trail systems, and even such things as illegal garbage disposal (Tilghman, 1987). Dog-walking is one of the most common recreational activities in the Edmonton river valley and is conducted by about a quarter of park users (Edmonton Community Services, 2001). To accommodate dog-walkers, the City of Edmonton has designated certain parks and trails as 'off-leash' areas where dog owners are permitted to walk their dogs without a restraining leash. In total, there are 40 such areas in Edmonton, and 14 of these are within the North Saskatchewan River valley. Because the activity of domestic dogs may affect wildlife in urban areas, civic employees were interested in estimating diversity and abundance of small animals that might be most susceptible to dog disturbance in areas with and without leash laws.

A variety of negative effects on wildlife have been documented for domestic dogs elsewhere and these may plausibly apply to the Edmonton area. Most generally, wildlife may be chased or disturbed by dogs as a vestige of their natural hunting instincts (Sime, 1999). Flushing in response to the presence of dogs is a documented and conspicuous response shown by some city-dwelling passerines (e.g., Fernandez-Juricic and Telleria, 2000) and colonial shorebirds (e.g., Mitchell et al., 1988; Lafferty, 2001). Dogs can also cause physical injury (Doncaster, 1994; Shine and Koenig, 2001), nest disturbance (Govan, 1998), and even death (Fuller, 1990). Other effects may be more subtle and less easily observed. As examples, disturbance by dogs can cause energetic loss when it results in an evasive response, increased vigilance, or lost foraging opportunities (Burger, 1986; Fernandez-Juricic and Telleria, 2000). Domestic dogs also have the potential to introduce disease or parasites into urban wildlife populations (Sime, 1999). Finally, the presence of dogs may exert a cumulative effect with other disturbances to reduce habitat suitability (Fernandez-Juricic, 2002).

Because leashing of dogs may reduce some forms of disturbance (e.g., chasing) (Lafferty, 2001), we investigated the effect that dog leash laws have on the diversity and abundance of songbirds and small mammals. These groups are relatively unstudied in this context, yet appear to be both abundant and diverse (in the case of birds) in the Edmonton River Valley (Mowat, 1993). In general, urban bird communities appear to be more influenced by habitat features that occur at a local level than they are by large-scale landscape characteristics (Clergeau et al., 1998, 2001) and this may be true of fragmented populations more generally (Mazerolle and Villard, 1999). Therefore, off-leash dogs in the Edmonton River Valley, which are officially restricted to designated sites, may affect wildlife on a very small spatial scale. Accordingly, we hypothesized that designated off-leash areas would represent comparatively

poor habitat and would negatively influence diversity and/or abundance of birds and small mammals relative to nearby similar habitat where dogs were required to be leashed within the same urban park system.

## Methods

### Study area

All census sites were located in the North Saskatchewan River valley and adjoining ravines within the city of Edmonton, Alberta (53° 33' 00" N–113° 28' 00" W). Within the 7400 hectares of parkland are 190 kilometers of multi-use trails and 22 different park areas. The presence of these amenities attracts an estimated 2 million users annually (Anonymous, 2002).

A total of 56 separate sites were selected within the river valley with an equal number of sites located in areas designated as requiring dogs to be on-leash and off-leash. On-leash sites were defined as sites which either disallowed dogs or required that they be leashed. These areas were also believed by City officials to have high public compliance with leash laws (K. Moore, personal communication). Off-leash sites were in officially designated off-leash areas or, in two cases, were in areas that were designated as on-leash, but were known to experience frequent use by off-leash dogs and their owners (K. Moore, personal communication). Sites were further categorized into three habitat classifications according to the dominant vegetation type: deciduous-dominated, coniferous-dominated, and meadow. Aspen (*Populus tremuloides*), the dominant tree species in the North Saskatchewan River valley, was qualitatively the most common tree species in deciduous-dominated sites (Mowat, 1993) which also contained balsam poplar (*Populus balsamifera*). Coniferous sites were generally located on north-facing slopes or in steep-sided ravines, and were dominated by white spruce (*Picea glauca*). Within meadow sites, we used two habitat sub-types; those that consisted of natural unmowed vegetation (i.e. semi-natural sites) and grassy areas comprised partly or mainly by introduced grass species that are routinely mowed by the City (i.e. manicured sites). We anticipated that manicured sites may have different communities than natural ones, but too few natural sites of sufficient size were available to obtain similar numbers of sites within that habitat alone. The few natural sites that we did find were located in small patches of grassland on south-facing slopes and along the bottom of the river valley. Vegetation cover in the natural sites was comprised of several species of grass (e.g. *Bromus inermis*, *Agropyron* spp., *Festuca* spp.), thistle, and leguminous species (e.g. *Melilotus* spp.) (Mowat, 1993). The distribution of on-leash sites among habitat types was 11 deciduous, 10 coniferous, and seven meadow sites. Within off-leash areas, sampling occurred at 10 deciduous, 10 coniferous, and eight meadow sites. We used 1:10 000 locally-produced orienteering maps to place our sampling sites at the center of target habitat patches and then navigated to them using known reference points. The location of trails was not considered during site selection. The centers of the sites were placed at least 250 meters apart to minimize the possibility of double-counting individuals.

### Bird surveys

We conducted bird surveys in all 56 sites a total of three times each between May and July 2002. Surveys were conducted between sunrise and 10 AM and only under calm weather

conditions (wind less than 5 on the Beaufort scale) without significant precipitation. Each site was sampled at a different time on each visit to control for temporal variation.

Each survey involved a 5-minute, 100 m, fixed-radius point count (Bibby et al., 1992) followed by a 5-minute playback (*sensu* Gunn et al. 2000 after Desrochers and Hannon, 1997) of a black-capped chickadee (*Poecile atricapillus*) mobbing call. The chickadee mobbing call is known to attract several bird species that occur within the study area (Hurd, 1996; Gunn et al., 2000) and we used it to increase detection of less vocal species (e.g., woodpeckers) and to provide opportunities for behavioural observations (below). A 5-minute post-playback point count concluded each survey. We recorded all birds that were seen or heard during the 15 min. Birds were only counted if they interacted with the habitat, meaning that birds observed flying over the study site were not recorded. Caution was taken to minimize the chance of double counting individual birds by carefully noting their direction and apparent movement during the census. When possible, we observed individual birds carefully to collect evidence of breeding activity (after Vickery et al., 1992) by taking advantage of the close approaches that typically followed use of the mobbing call (Gunn et al., 2000). Individual bird species were considered to be breeding at a site if we recorded one of the following criteria: (a) a male was singing on at least two of the three visits, or (b) an individual of either sex was seen exhibiting breeding behavior (i.e., traveling in a pair, carrying nesting material, food, or fecal sacs) on any visit (after Gunn et al., 2000).

#### Small mammal surveys

To accommodate the greater effort that it required, small mammals were live-trapped at a randomly selected subset of 32 of the original 56 sites between mid-July and mid-August, 2002. The distribution among habitat types of the 32 sites was 10 deciduous, 10 coniferous and 12 meadow sites. Twelve meadow sites were selected to allow for equal sampling effort among meadow sub-types ( $n = 6$  of each) and among dog treatments ( $n = 3$  within each meadow sub-type).

Each site was sampled using an array of 10 Victor Tin-Cat® live-, multiple-capture traps placed approximately 20 m apart. The arrangement of traps varied between sites to accommodate local physical features, but was generally comprised by two parallel lines of traps placed greater than 3 m away from either side of a trail. When possible, all traps were placed within the site's point count radius. When this was not possible, traps were placed as close as possible to the point count center and within the same habitat type.

Each site was pre-baited for five nights then trapped for two consecutive nights to permit mark-recapture population estimation (Sutherland, 1996). Three or four sites were trapped per night and these were spread among two or more of the treatment and habitat types to control for seasonal variation in small mammal numbers. Pre-baiting was conducted using pop cans with enlarged openings that were nailed in place and baited with sunflower seeds. To maximize trapping success, traps were placed along woody debris and in other areas likely to be used by small mammals. Traps were covered with plant material to conceal their presence from the public and to provide insulation from both heat and cold. Traps were set in the evenings, baited with a handful of sunflower seeds and dry cat food, and checked the following mornings. During the day between the first and second night of trapping, each trap was locked open and left in place. Traps that were placed in manicured meadow sites were covered with wooden boards for additional protection from the elements.

Following the first night of trapping, each trapped individual was identified to species, sexed, weighed, and marked with a permanent marker at the base of its tail and then released.

The average time it took to process each animal was approximately 1 min. After the second night of trapping the same procedure was followed but no animals were marked.

### Statistical analysis

We calculated species diversity using the Shannon-Wiener diversity index (following Krebs, 1994). To examine differences in diversity and abundance among treatments and habitat types, we used parametric tests (ANOVA and *t*-tests) when the data satisfied the assumptions of normality and homogeneity of variance (Sokal and Rohlf, 1981). In some cases the data needed to be transformed to meet these assumptions so the square-root transformation ( $\sqrt{Y + \frac{1}{2}}$ ) was applied (Sokal and Rohlf, 1981). We used Tukey's honestly-significant difference (HSD) statistic to conduct post-hoc, pair-wise tests among ANOVA means (Sokal and Rohlf, 1981). When the assumptions were not met and the data could not be transformed to meet them, we used the non-parametric analogue to a *t*-test, the Mann-Whitney U test.

## Results

### Birds

In total, 2 203 birds representing 61 species (including two unidentified *picidae* and *interidae* spp.) were counted during the bird censuses. The black-capped chickadee (see Table 1 for scientific names) was the most abundant species, accounting for 30% of all observations. Other common species, each accounting for at least 5% of all observations, were the least flycatcher, red-eyed vireo, red-breasted nuthatch, and yellow warbler.

We examined bird diversity as a function of habitat type and leashing bylaw designation in two ways; by including all birds that were detected and with only those birds that exhibited evidence of breeding. Across all species, bird community diversity differed as a function of habitat (Fig. 1(A);  $F = 100.0$ ,  $df = 2, 50$ ,  $P \leq 0.001$ ), but not as a function of dog leashing bylaws ( $F = 1.5$ ,  $df = 1, 50$ ,  $P = 0.23$ ) or the interaction between leashing bylaws and habitat ( $F = 0.6$ ,  $df = 2, 50$ ,  $P = 0.53$ ). Posthoc tests revealed that bird diversity did not differ between the deciduous-dominated and coniferous habitats (Tukey's HSD  $P = 0.85$ ), but both of these were significantly more diverse than the meadow areas (Fig. 1(A); Tukey's HSD  $P \leq 0.001$  for each). These results were qualitatively identical for birds that exhibited evidence of breeding (Fig. 1(B)). Again, diversity differed as a function of habitat (Fig. 1(B);  $F = 78.9$ ,  $df = 2, 50$ ,  $P \leq 0.001$ ), but not bylaw designation (Fig. 1(B);  $F = 0.003$ ,  $df = 1, 50$ ,  $P = 0.87$ ) or the interaction between bylaw designation and habitat ( $F = 0.06$ ,  $df = 2, 50$ ,  $P = 0.60$ ). Pair-wise differences between habitats were also similar; breeding bird diversity did not differ between deciduous-dominated and coniferous habitats (Fig. 1(B); Tukey's HSD  $P = 0.21$ ), but both of these habitat types had significantly greater diversity than meadow areas (Fig. 1(B); Tukey's HSD  $P \leq 0.001$  for each).

To assess differences in the abundance of birds as a function of leash designation, we compared the maximum number of individuals of all species detected at each site. The average of these abundances differed between habitat types (Fig. 2;  $F = 106.2$ ,  $df = 2, 50$ ,  $P \leq 0.001$ ), but not between on-leash and off-leash sites (Fig. 2;  $F = 0.004$ ,  $df = 1, 50$ ,  $P = 0.95$ ) or as a function of the interaction between leashing bylaw designation and habitat type ( $F = 1.1$ ,  $df = 2, 50$ ,  $P = 0.34$ ). The effect of habitat resulted in similar differences as before, and meadow sites had approximately 80% fewer birds than deciduous and coniferous-dominated sites.

**Table 1** Summary of the number and species of birds detected during censuses

Common name	Latin name	Number of detections during surveys (% of these detections made in OFF leash sites)	
ring-billed gull	<i>Larus delawarensis</i>	8 (63)	
ring-necked pheasant	<i>Phasianus colchicus</i>	2 (100)	
sharp-shinned hawk	<i>Accipiter striatus</i>	3 (33)	
Cooper's hawk	<i>Accipiter cooperii</i>	4 (50)	
pileated woodpecker	<i>Dryocopus pileatus</i>	8 (50)	
downy woodpecker	<i>Picoides pubescens</i>	44 (50)	a
hairy woodpecker	<i>Picoides villosus</i>	3 (33)	
unidentified woodpecker	<i>Picidea</i>	6 (33)	a
northern flicker	<i>Colaptes auratus</i>	1 (0)	
yellow-bellied sapsucker	<i>Sphyrapicus varius</i>	2 (50)	
western wood-pewee	<i>Contopus sordidulus</i>	2 (50)	
eastern phoebe	<i>Sayornis phoebe</i>	5 (40)	
alder flycatcher	<i>Empidonax alnorum</i>	3 (33)	
least flycatcher	<i>Empidonax minimus</i>	114 (56)	a
American crow	<i>Corvus brachyrhynchos</i>	53 (66)	
common raven	<i>Corvus corax</i>	2 (0)	
blue jay	<i>Cyanocitta cristata</i>	14 (50)	
black-billed magpie	<i>Pica pica</i>	56 (43)	
black-capped chickadee	<i>Poecile atricapillus</i>	670 (51)	a
boreal chickadee	<i>Poecile hudsonicus</i>	2 (0)	
white-breasted nuthatch	<i>Sitta carolinensis</i>	47 (45)	a
red-breasted nuthatch	<i>Sitta canadensis</i>	148 (45)	a
house wren	<i>Troglodytes aedon</i>	12 (33)	a
ruby-crowned kinglet	<i>Regulus calendula</i>	13 (46)	a
golden-crowned kinglet	<i>Regulus satrapa</i>	8 (38)	a
American robin	<i>Turdus migratorius</i>	68 (53)	a
Swainson's thrush	<i>Catharus ustulatus</i>	7 (57)	b
hermit thrush	<i>Catharus guttatus</i>	1 (0)	b
cedar waxwing	<i>Bombycilla cedrorum</i>	10 (70)	a
blue-headed vireo	<i>Vireo solitarius</i>	27 (30)	a
red-eyed vireo	<i>Vireo olivaceus</i>	141 (57)	a
warbling vireo	<i>Vireo gilvus</i>	4 (50)	
black-and-white warbler	<i>Mniotilta varia</i>	1 (100)	
Tennessee warbler	<i>Vermivora peregrina</i>	11 (36)	b
orange-crowned warbler	<i>Vermivora celata</i>	3 (33)	
yellow warbler	<i>Dendroica petechia</i>	194 (51)	a
Magnolia warbler	<i>Dendroica magnolia</i>	1 (0)	
yellow-rumped warbler	<i>Dendroica coronata</i>	31 (19)	a
blackpoll warbler	<i>Dendroica striata</i>	7 (71)	
ovenbird	<i>Seiurus aurocapillus</i>	13 (38)	a,b
Canada warbler	<i>Wilsonia canadensis</i>	2 (100)	
American redstart	<i>Setophaga ruticilla</i>	3 (0)	
red-winged blackbird	<i>Agelaius phoeniceus</i>	1 (0)	
unidentified blackbird	<i>Icteridae</i>	9 (11)	a
northern oriole	<i>Icterus galbula</i>	7 (57)	a
western tanager	<i>Piranga ludoviciana</i>	31 (48)	a
rose-breasted grosbeak	<i>Pheucticus ludovicianus</i>	6 (50)	
purple finch	<i>Carpodacus purpureus</i>	5 (40)	a

(Continued on Next Page)

**Table 1** (Continued)

Common Name	Latin Name	Number of detections during surveys (% of these detections made in OFF leash sites)	
pine siskin	<i>Carduelis pinus</i>	56 (34)	
red crossbill	<i>Loxia curvirostra</i>	6 (100)	
white-winged crossbill	<i>Loxia leucoptera</i>	7 (100)	
savannah sparrow	<i>Passerculus sandwichensis</i>	54 (52)	a,b
le Conte's sparrow	<i>Ammodramus leconteii</i>	8 (63)	a,b
vesper sparrow	<i>Pooecetes gramineus</i>	2 (100)	a,b
dark-eyed junco	<i>Junco hyemalis</i>	39 (54)	a,b
chipping sparrow	<i>Spizella passerina</i>	69 (42)	a
clay-colored sparrow	<i>Spizella pallida</i>	63 (43)	a,b
white-throated sparrow	<i>Zonotrichia albicollis</i>	60 (55)	a,b
Lincoln's sparrow	<i>Melospiza lincolnii</i>	1 (0)	
song sparrow	<i>Melospiza melodia</i>	21 (62)	a,b
house sparrow	<i>Passer domesticus</i>	4 (50)	
Total detections		2203 (49)	

<sup>a</sup>Species considered to be breeding, within at least one study site (see methods for definition)

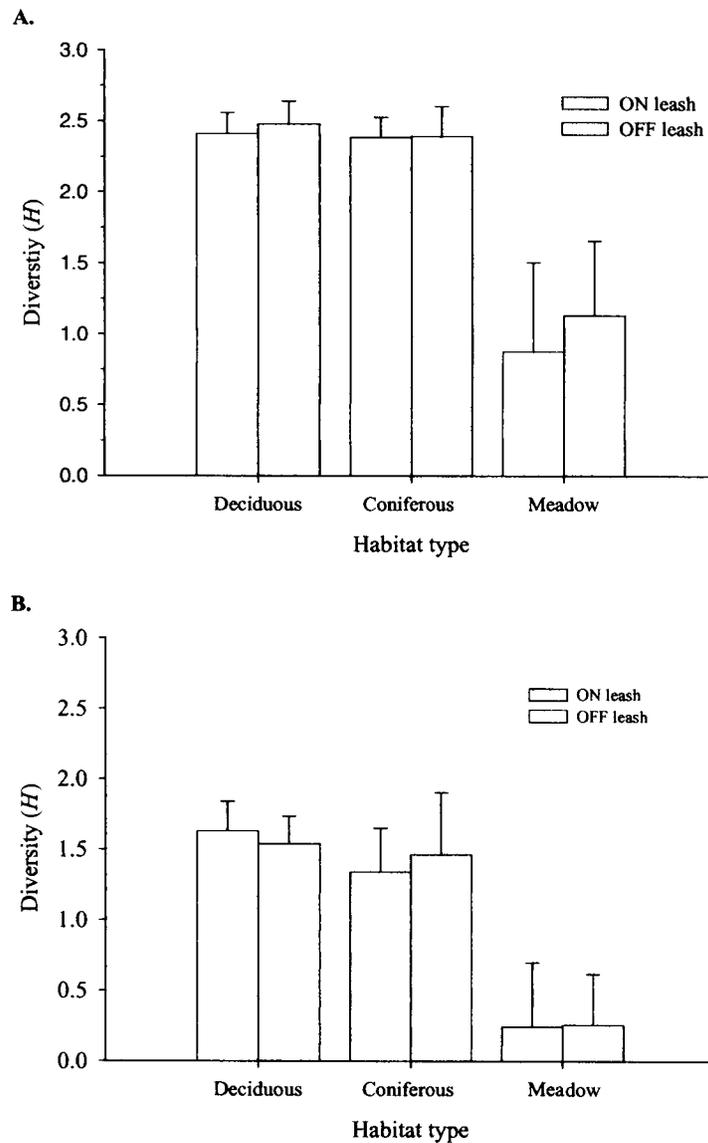
<sup>b</sup>Species that nest on the ground or in low shrubs which were thus considered to have potentially greater vulnerability to the effects of urban dogs

We considered the 11 species that nest on the ground or in low shrubs to have potentially greater vulnerability to the effects of urban dogs. Thus, we compared the abundance of these species individually as a function of dog designation and grouped birds by habitat to increase the power of the test (*sensu* Cohen, 1988). Eight species displayed clearly non-significant differences in abundance between on-leash and off-leash sites (Mann-Whitney  $U \leq 92.0$ ,  $df = 1$  to 29,  $P \geq 0.16$  for each species). The ninth species, the song sparrow, was only marginally non-significant ( $U = 9.0$ ,  $df = 7$ ,  $P = 0.08$ ), but in the unpredicted direction; almost twice as many sparrows were counted in off-leash sites as were in on-leash areas. When subjected to a Bonferroni adjustment to account for the multiple comparisons, all species-specific differences were highly non-significant (adjusted  $P$  required for significance (0.0056). There were insufficient data to analyze the two other ground-nesting species (vesper sparrow and hermit thrush) that were counted during the surveys.

In addition to these ground-nesting birds, we also examined differences in the abundance of the five most common forest species encountered during the survey period for which differences may have been more apparent owing to larger values and lower variance (again, *sensu* Cohen, 1988); black-capped chickadee, least flycatcher, red-breasted nuthatch, red-eyed vireo, and yellow warbler). Four species showed non-significant differences in abundance between on-leash and off-leash sites (Mann-Whitney  $U \leq 237.5$ ,  $df = 26$  to 42,  $P \geq 0.33$ ). Comparable to song sparrows, red-eyed vireos were 33% more abundant in the off-leash sites than they were in on-leash sites (Mann-Whitney  $U = 116.0$ ,  $df = 38$ ,  $P = 0.03$ ). However, after subjecting the data to a Bonferroni adjustment to account for the multiple comparisons made between species this difference was not significant (adjusted  $P$  required for significance (0.01).

#### Small mammals

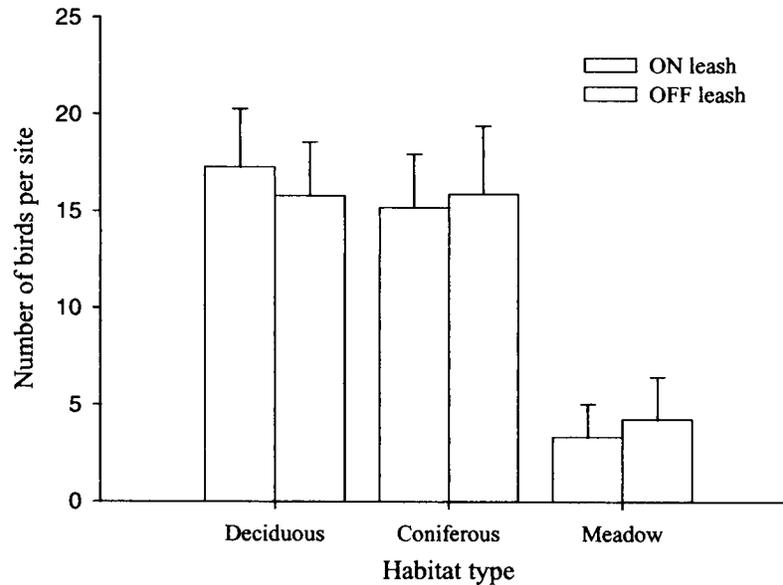
Three species were detected in the small mammal census. In order of decreasing abundance these species were the deer mouse (*Peromyscus maniculatus*), red-backed vole (*Clethrionomys*



**Fig. 1** Shannon-Wiener indices of bird diversity (mean  $\pm$  SD) across dog treatment and habitat types observed in the Edmonton river valley parks for (A) all bird species recorded during survey period and (B) only those bird species considered to be breeding at a site

*onomys gapperi*), and meadow vole (*Microtus pennsylvanicus*), comprising a total of 287 individuals. Sixty-one individuals were recaptured on the second night of trapping, bringing the total number of captures to 348.

Abundance was compared using two sources of data; the highest counts per site based on the greatest number of individuals trapped in one night and population estimates derived for each site using the Petersen mark-recapture technique (as described by Sutherland, 1996).



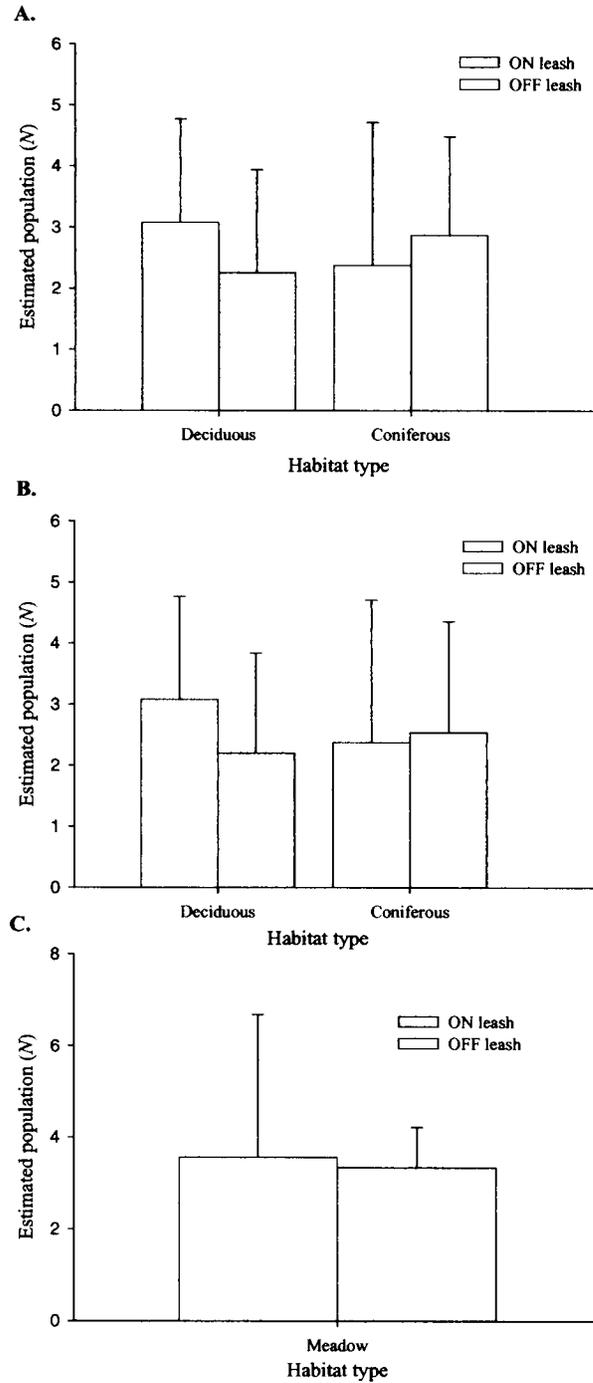
**Fig. 2** Average number of birds detected per site (mean  $\pm$  SD) across all species, treatment, and habitat types in the Edmonton River valley parks

Square-root transformation population estimates of each species were analyzed separately via two-way ANOVA (for deer mice and red-backed voles which occurred in both forested habitat types) and *t*-test (for meadow voles which occurred only in meadow habitat). For deer mice and red-backed voles, population estimates did not differ as a function of habitat (Figs. 3(A) and (B),  $F = 0.003$  and  $1.02$  respectively,  $df = 2,9$  and  $2,7$ ,  $P = 0.96$  and  $0.33$ ), leash designation ( $F = 0.04$  and  $0.64$ ,  $df = 1,9$  and  $1,7$ ,  $P = 0.85$  and  $0.43$ ) or the interaction between dog treatment and habitat type ( $F = 0.63$  and  $2.23$ ,  $df = 2,9$  and  $2,7$ ,  $P = 0.44$  and  $0.16$ ). Meadow voles also displayed a clearly non-significant difference between on-leash and off-leash sites (Fig. 3(C),  $t = -0.12$ ,  $df = 2,3$ ,  $P = 0.92$ ). Across all three species, these results were qualitatively unchanged when we made similar comparisons using the maximum one-night capture rate for each site as a measure of abundance.

#### Manicured vs. semi-natural comparisons

Because the apparent bird and small mammal diversity of meadow habitat differed so strikingly in the field as a function of horticultural practice, we examined these differences with an *a posteriori* analysis. Bird diversity was significantly greater in semi-natural sites than it was in manicured sites ( $t = 2.42$ ,  $df = 8,4$ ,  $P = 0.04$ ). However, overall, bird abundance did not differ as a function of horticultural practice ( $t = 1.20$ ,  $df = 10,9$ ,  $P = 0.26$ ), presumably because of changes in the composition of the bird community. Predictably, more typically-urban species (i.e. black-billed magpie, American crow, ring-billed gull, American robin, and house sparrow) were found in manicured sites compared to a more native composition of the bird community within semi-natural sites (i.e. savannah sparrow, Le Contes sparrow, vesper sparrow and clay-colored sparrow).

**Fig. 3** Estimates of small mammal population sizes (mean  $\pm$  SD) across treatment and habitat types observed in the Edmonton river valley parks for (A) deer mice and (B) red-backed voles and (C) meadow voles. Estimates were calculated with square root transformed data using the Petersen method of mark-recapture



Small mammal abundance was also higher in semi-natural sites. As many as 11 meadow voles were caught during one night in a single semi-natural meadow site, and the average one-night maximum capture rate was six (only meadow voles were trapped in meadow sites). This average value corresponds to an approximate and average population estimate of 11 individuals per semi-natural meadow site. In contrast, not one individual of any species was caught among all manicured sites during the entire survey period. The lack of variance in this category precludes statistical analysis.

## Discussion

Designation of sites for dogs to be on- or off-leash had no measurable effect on the diversity or abundance of birds and small mammals within the sites that we surveyed in the Edmonton River valley. There was a similar lack of difference in bird abundance when we restricted analyses to only those species that appeared to be breeding, only those species that nest on the ground or in low shrubs, and only the most abundant species. These results contrast with some other studies, which reported that many species of wildlife are affected by free-running dogs (Sime, 1999; Lafferty, 2001). We expected that an effect on diversity of leash designation would be apparent at the scale of our censuses because comparable local scales appear more generally to influence the composition of urban bird communities (Clergeau et al., 1998, 2001; Melles et al., 2003). Given that our results did not support our hypothesis that leashing bylaws affect the diversity or abundance of birds and small mammals, there are two types of interpretations for them. In the first category, several factors make it plausible that free-running dogs do not affect urban birds or wildlife, or not by the measures we employed (diversity and abundance). In a second category, our design may have precluded identifying effects of dogs that really exist.

Consistent with the first interpretation, free-running dogs may not affect birds and small mammals in the vicinity of human use trails because dog activity is restricted to such small temporal and spatial scales that its effects are negligible. Behavioral data suggests that off-leash dogs generally do not travel far off trail, and that when they do it is only for brief periods (Bekoff and Meaney, 1997). By our subjective and anecdotal assessment, dogs in our study area travelled off trail very little, especially in wooded sites, and only slightly more in semi-natural meadow sites. However, dogs did typically stray widely within the manicured meadow sites (AF, personal observation), but in those areas low habitat quality likely overwhelmed our ability to detect differences in diversity or abundance owing to dog activity.

A second biological reason that there was no apparent effect of leashing bylaws is that wildlife, particularly birds, in suburban and urban areas exist there because they are fairly tolerant of moderate levels of human activity (Cooke, 1980), including accompanying dogs. Fernandez-Juricic et al. (2001) have shown that birds can even become habituated to dogs in highly used urban parks. Bird tolerance appears to be highest once territories are established and nesting has begun (Tilghman, 1987) and this corresponds with the timing of our censuses. In fact, moderately perturbed habitats often have greater species richness than do the most natural habitats (Blair, 1996; Tilghman, 1987), perhaps as a function of greater habitat diversity. Thus, the tendency for song sparrows and red-eyed vireos to be more abundant in areas with off-leash dogs may mean that this disturbance somehow improves habitat quality for these species. This supports Mortberg's (2001) assertion that the effect of disturbance from recreation on densities of breeding birds is species-specific.

A third reason that leash designation may not affect birds and small mammals in Edmonton is because these communities may already have responded to the presence of wild coyotes (*Canis latrans*), which are abundant in Edmonton's North Saskatchewan River Valley (Mowat, 1993; Patriquin, 1992). Coyotes are a natural predator of both birds and small mammals (Pattie and Fisher, 1999) and historically occurred in the aspen parkland ecoregion that surrounds Edmonton. The presence of coyotes may reduce the novelty, and hence reaction to, free-running dogs and they may also enhance bird and small mammal communities by reducing the occurrence in ravine parks of domestic cats (Crooks and Soule, 1999).

A second category of explanation for our results is that free-running dogs had negative biological effects on wildlife in our study area, but we were not able to detect them. There are three main ways that this may have come about. The first is that the effect of leash laws was swamped by variation in one or more habitat or site characteristics that exerted greater influences on wildlife diversity or abundance. Among these potential characteristics are landscape structure adjacent to woodlands (Jokimaki, 1999; Melles et al., 2003), habitat structural complexity (e.g., Scott et al., 2003), distance to the nearest trail (Tilghman, 1987; Miller et al., 1998), distance to water (e.g., Tilghman, 1987), level of human activity (Fernandez-Juricic and Jokimaki, 2001), average canopy height (Tilghman, 1987), and the size of censused patches (Crooks et al., 2004). Trail proximity may have particular importance because trails can alter species composition in forest ecosystems (Miller et al., 1998) and both official and unofficial trails are ubiquitous in the Edmonton River Valley. Other studies have shown that bird diversity decreases along a gradient of increasing urbanization (Blair, 1996; Clergeau et al., 1998; Reynaud and Thioulouse, 2000), and such effects could obscure or contradict the potential negative effect of off-leash dogs. During site selection, we did not attempt to measure trail density, proximity to city center, patch size or any of the other habitat characteristics named above, and these may also be profitable subjects of further investigation.

A second reason that we may not have detected existing differences in the diversity or abundance of birds and small mammals is that this effect was confounded by variation in habitat quality between the two leashing designations. In contrast to the majority of the urban parks, it was our subjective impression that the designated off-leash areas within Edmonton were less developed. Parks personnel confirmed that off-leash areas are generally designated in areas where conflicts with a majority of other user types can be avoided (K. Moore and D. Frost, personal communications). Development levels may have an influence on wildlife because of its implications in both biotic and abiotic components of habitat quality. Biologically, less developed parks have increased amounts of vegetative cover (Jokimaki, 1999), and decreased occurrences of exotic species (Blair, 1996). Greater vegetation cover in particular is known to affect both birds (Jokimaki, 1999) and small mammals (Dickman, 1986). More specifically, increased cover can cause birds to show more tolerance towards human-related disturbances (Knight and Temple, 1995). Off-leash areas may also have occurred in areas with greater food availability, particularly for insectivorous species, which may generally be more sensitive to the effects of urbanization (Parsons et al., 2003; Lim and Sodhi, 2004). It would be worthwhile to subject this hypothesis, that off-leash areas occur in areas of higher habitat quality, to further investigation.

A final reason why we failed to detect an impact of leash designation within the urban parks of Edmonton may be that no difference existed in dog behaviour as a function of leashing bylaws. Via personal observation throughout the summer, and through personal communication with City of Edmonton Park Rangers, there is evidence that some people do not comply with leashing bylaws in city parks. Non-compliance may be a widespread problem as Lafferty (2001) also noted low levels of compliance with leash laws by dog

owners on a southern California beach. It is possible that the rate of non-compliance was high enough to nullify functional differences in our leash designation treatments and, consequently, differences in our response variables.

Whether or not there exist effects of off leash dogs on the diversity and abundance of birds and small mammals, dog activity may disrupt several more subtle aspects of wildlife communities that we did not measure. Most importantly, dogs may reduce nesting success (e.g., Gutzwiller et al., 1998), but not species abundance or the frequency of nesting attempts in habitats that ultimately function as sinks for regional populations (*sensu* Pulliam, 1988). For this reason, animal density and abundance may not be reliable indicators of habitat quality as we have implicitly assumed (Van Horne, 1983). In addition, domestic dogs have the potential to impose stress-related physiological effects on wildlife and may introduce diseases and parasites into populations of urban wildlife (Simes, 1999). Finally, dogs may exert greater effects on larger mammals that provide more visible targets for chase (e.g., white-tailed deer [Fuller, 1990; Ballard, 1999], red squirrel, snowshoe hare) that we did not census.

#### Manicured versus semi-natural meadow sites

Because our sample of meadow habitat included both manicured and semi-natural sites, we were able to show that meadow sites with manicured grass had significantly lower levels of avian diversity and small mammal abundance than did semi-natural sites with non-manicured grass. The abundance of birds at manicured sites also tended to be lower than it was at semi-natural sites, but not significantly so with our conservative multiple-comparison procedure. The lower diversity of birds in manicured sites is probably a function of their decreased habitat suitability as nesting or foraging sites. Because most birds do not forage far from vegetative cover, which they perceive as protection from predators (Giesbrecht and Ankney, 1998; Rodriguez et al., 2001), the lack of vegetative cover in these areas probably compromised both habitat quality and resource availability (Scheiman et al., 2003). Similar limitations of short grass would have afflicted the small mammal community (Jensen and Honess, 1995), explaining the complete lack of mammal detections in this area. Most of the native songbirds in the study area, which are insectivorous, granivorous, or fruitivorous, probably also lacked appropriate forage in the manicured sites. Instead, these sites would have contained the kind of human refuse (i.e. because they are the site of picnics, festivals, and organized sport) that is favoured by the scavenging and urbanized species we found there (e.g., ring-billed gulls, black-billed magpies, American crows, house sparrows and American robins; see also Fernandez-Juricic et al., 2002; Parsons et al., 2003). Our findings support a general expectation that more heavily modified areas are typically dominated by a few species that occur at high densities (Tilghman, 1987; Edgar and Kershaw, 1994; Melles *et al.*, 2003; Fraterrigo and Wiens, 2005), and also suggest that these practices exert far greater effects than the presence of off-leash dogs.

#### Conclusions

Although this study found no impact of dog leashing by-laws on the diversity and abundance of both birds and small mammals, it would be imprudent to conclude that dogs have no effect on wildlife for the several reasons described above. Among the results of this study, perhaps the most pertinent finding that relates directly to the management of urban parks that are assumed to have much value to resident wildlife (Fernandez-Juricic and Jokimaki, 2001) is

the issue of leash law compliance. The suspected lack of compliance indicates the need for investigation into the reasons why people ignore leashing bylaws so that steps can be taken to improve the situation. The striking effect of horticultural practices on the diversity (birds) and abundance (mammals) suggests an inexpensive solution for increasing biodiversity in urban areas. It is likely that cities could substantially increase biodiversity simply by letting existing green spaces revert to a more natural state (Crooks et al., 2004).

If future research finds that dogs do adversely affect wildlife, there are several measures that might reduce this impact. Increased enforcement and higher fines may increase the effect of leashing laws. Better visual delineation of sensitive areas might be effective to further restrict the spatial impact of dog activity. Finally, city planners might try to identify key habitat features that are elsewhere correlated with wildlife diversity (e.g., structural diversity: Linehan et al., 1967; Tilghman, 1987) and then assess and limit the impact of dogs and other recreational activity on these attributes.

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# INTERACTIONS AMONG DOGS, PEOPLE, AND THE ENVIRONMENT IN BOULDER, COLORADO: A CASE STUDY

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***"The environment is not a luxury. When political movements have faded, when economic systems have changed, when ideologies have been superseded and forgotten, the environment will still be important." (Sylvan and Bennett 1994, p. 6)***

***"That recreational activities disturb wildlife is well appreciated but poorly understood. Most popular forms of recreation in wildlands have yet to receive detailed study." (Knight and Cole 1995, p. 61)***

## ABSTRACT

From September 1995 to April 1996 we studied interactions among dogs, people, and the environment in Boulder, Colorado. Data on behavioral disturbances by off-leash dogs who were accompanied by a person were collected with respect to dog-dog and dog-human interactions, dog-wildlife encounters, dogs trampling vegetation, and dogs entering and disturbing bodies of water. A questionnaire also was administered. Behavioral data showed that off-leash dogs generally did not travel far off trail, that when they did it was for short periods of time, and that they rarely were observed to chase other dogs, disturb people, chase wildlife, destroy vegetation, or enter bodies of water. Results from analyses of the questionnaire (skewed toward non-dog owners) showed that dog owners and non-dog owners agreed that people were more disruptive to the environment than dogs and that unruly people were more problematic than unruly dogs. We conclude that the well-being and interests of dogs should not summarily and dismissively be compromised when dogs and people attempt to share limited space that can be used by all parties for recreational purposes. Indeed, a higher percentage of people reported that the quality of dogs' experience of the outdoors would be compromised more than their own enjoyment if dogs could not walk off-leash in areas where this is currently permitted. The methods used and the results from this case study can serve as a model for other locations in which dogs and people compete for limited spatial resources.

## INTRODUCTION

**A**cross the United States and in many other countries there is growing interest in how human and nonhuman animals (hereafter animals) can best share space that can be used by all parties for recreational purposes (see Knight and Gutzwiller 1995 for review). Although concern often focuses on the mutual well-being of humans and animals, when priorities have to be established, humans generally receive favor-

able treatment. Furthermore, when there are competing interests among humans, domestic dogs (*Canis familiaris*), wild animals, and "nature" in general, dogs' well-being and interests are often overridden (because they are "merely dogs" or "simply domesticated animals;" see Bekoff 1995, 1996a and Bekoff and Jamieson 1996 for discussion).

In the late 1800s, the people of Boulder, Colorado, had the foresight to set aside a large parcel of land backing into the foothills. Since then, additional land has been purchased under an Open Space program to create a greenbelt around the city, and to provide wildlife habitat and recreational opportunities. This program has been very successful and popular with the public.

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In recent years, there has been a large increase in the use of Open Space trails in Boulder. As emphasized by Roberts (1995), Boulderites who enjoy the outdoors "love their parks to death" as they pursue recreational activities. This community resource, which is shared by humans and animals, consists of about 25,000 acres and approximately 150 miles of trails. In 1993 there were about 1.3 million visits, an increase of 13% compared to previous years (Miller 1994). In one study, it was reported that 21.3% of groups visiting Boulder City Open Space participated in exercising their companion dogs (Zeller et al. 1994). In Boulder, as in other communities, companion animals such as dogs are very important to some people and problematic to others. The resulting conflicts between different groups (pro- and anti-dog factions) of people have placed the Boulder City Council in the position of having to consider various management decisions. Empirical data are necessary and can help to deal with controversial issues such as these in a more objective and straightforward manner. The development of sound management policies that attempt to maximize the well-being of all parties in recreational areas, including the possibility of placing restrictions on dogs, require detailed consideration of perceived and actual problems. Whereas there is a significant literature on human attitudes towards domestic and wild animals (e.g. Kellert 1994; Serpell 1995a,b, and references therein), there are very few data that can inform management decisions at the local level. As the number of humans and companion animals increases, existing land use problems continue to grow in Boulder (Roberts 1995; Zaslowsky 1995) and in other communities.

Among the major issues regarding land use in Boulder and other locales is the concern that off-leash dogs disturb other dogs, people, wildlife, and the environment. Some data support this claim (see Lowry and McArthur 1978, Gentry 1983, Mainini et al. 1993, Miller 1994, Knight & Gutzwiller 1995, and references therein), whereas other data suggest either that dogs have a minimal demonstrable effect on animals such as deer (e.g. Progulskis and Baskett 1958; Sweeney et al. 1971; Scott and Causey 1973) or that human impacts are equally or more invasive (e.g. Yalden and Yalden 1990). Clearly, the issues concerning the impact of dogs on wildlife and habitat require further and more detailed attention.

## METHODS

Data were collected from September 1995 through April 1996 at six different locations in and around Boulder (four Open Space locations

and on the University of Colorado, Boulder, campus and on the Pearl Street Mall). To achieve our goals of learning more about the behavior of off-leash dogs and about people's attitudes and perceptions towards dogs, we devised an original questionnaire and also collected detailed information on behavior. We felt that a combination of these two approaches should help to clarify distinctions between perceived problems and actual areas of conflict among dogs, people, and the environment.

## Questionnaires

Our questionnaire (Appendix A) characterized the respondents by place of residence, patterns of use of Open Space, whether or not they owned and had a dog with them, their attitudes toward dogs and people, their experiences with dogs and people on Open Space, their views of the impact of dogs and people on habitat and wildlife, and their concerns about Open Space in the future. The questionnaire was developed and implemented with the input of professional pollsters and administered at the same four locations on Open Space at which data were collected on behavioral disturbances (Mt. Sanitas, Bobolink Trail, Chautauqua, Doudy Draw) where dogs are allowed to be off-leash, and also at two other locations (University of Colorado, Boulder Campus and Pearl Street Mall) where dogs are required to be on a leash. (Two other areas [Sawhill and Walden Ponds] received too little use to be included in the present data set.) All visitors with and without dogs were asked to fill out the questionnaire while the researcher waited for its completion. The questionnaires were analyzed by Market Research Services, Longmont, Colorado and cross-tabulations were run so that responses to each question could be correlated with one another.

## Behavioral Disturbances

In this part of our study we were concerned with the following short-term and direct behavioral disturbances (for discussion, see Knight and Cole 1995, p. 61) by off-leash, companion dogs who were accompanied by a person. Data consisted of (i) characterization of the patterns of space use by individually observed dogs; (ii) characterization of patterns of chasing and flushing wildlife and disturbing vegetation and bodies of water; (iii) the nature of dog-dog encounters, and (iv) the nature of dog-people encounters.

Behavioral data were collected at six locations (see above). Observations were made "on trail" or from a stable vantage point, and efforts were made to minimize the effects of

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Colorado. Boulder, (1st Street Mall). To learn more about the behavior of dogs and about people's attitudes towards dogs, we developed a questionnaire and also collected behavioral data. We felt that these approaches should be used to address perceived differences between perceived levels of conflict among dog owners and dog owners.

Study A) characterized the behavior of dogs at residence, patterns of use, whether or not they were on-leash, their attitudes towards dogs, their experiences with dogs, their views on habitat and Open Space, their views on habitat and Open Space, and a questionnaire was developed to collect the input of professional dog owners at the same four locations (Mt. Sanitas, Doudy Draw, and two off-leash, and also at the University of Colorado, 1st Street Mall) where dogs were on-leash. (Two other locations [Ponds] received too little data to be included in the present data set.) The dogs were asked to complete the questionnaire while the researcher was present. The questionnaires were collected by Research Services, and the data were tabulated. The questionnaires were collected by Research Services, and the data were tabulated. The questionnaires were collected by Research Services, and the data were tabulated.

Study B) were concerned with direct behavioral observations of companion dogs who were on-leash. Data consisted of observations of space use and (ii) characterization of interactions involving wildlife and dogs; (iii) the behavior of dogs; and (iv) the nature of interactions between dogs and people.

Study C) were collected at six locations where observations were made at a distance of 100m, and to measure the effects of

researchers' presence. For example, observers sat in the same place quietly and dogs generally paid little overt attention to them. At each location, beginning at the trailhead and extending for 500 meters (m), the trail was partitioned with flagging into five linear 100m sections. Other 100m sections further along a trail were randomly sampled to see if there was any "trailhead effect."

Seven different people collected field data and administered the questionnaires. Regular meetings were held to make sure that there was consistency among the different researchers. Focal animal sampling (Altmann 1974), in which individual dogs were followed during their travels within each of the 100-meter sections, was used. All of the dog's activities and its location were recorded on prepared score sheets or read into a voice-activated tape recorder. A continuous time-base was maintained using stop watches. For each 100-meter section, we recorded the frequencies and rates with which dogs were "off trail" and "on trail," the distances from the trail that dogs travelled, and whether or not leaving the trail was owner-induced (e.g. by throwing a Frisbee or a stick). We recorded all events of flushing and chasing, including and independent of the focal animal. We recorded observed instances when a dog did not appear to flush or to chase wildlife (recognizing that unobservable physiological changes can be caused by the presence of dogs; for discussion, see Gabrielson and Smith 1995). The mammalian species with which we were concerned included mule deer (*Odocoileus hemionus*), yellow-bellied marmots (*Marmota flaviventris*), black-tailed prairie dogs (*Cynomys ludovicianus*), rock squirrels (*Spermophilus variegatus*), jackrabbits (*Lepus* spp.), cottontails (*Sylvilagus* spp.), coyotes (*Canis latrans*), and red foxes (*Vulpes vulpes*). Avian species included black-billed magpies (*Pica pica*), robins (*Turdus migratorius*), dark-eyed juncos (*Junco hyemalis*), mallard ducks (*Anas platyrhynchos*), steller's jays (*Cyanocitta stelleri*), and mountain bluebirds (*Parus gambeli*) and black-capped chickadees (*Parus atricapillus*).

Data were analyzed using proportions tests (Bruning and Kintz 1977, p. 222ff) which generate the z statistic. We used  $p < 0.05$  (two-tailed test;  $z_{crit} > 1.96$ ) to indicate significant differences between two percentages. The phrase "no significant difference" or similar terms mean that  $z \leq 1.96$  and  $p > 0.05$ . Critical values of z for other levels of statistical significance are 2.58 ( $p < 0.010$ ) and 3.30 ( $p < 0.001$ ).

## RESULTS

### Behavioral Disturbances

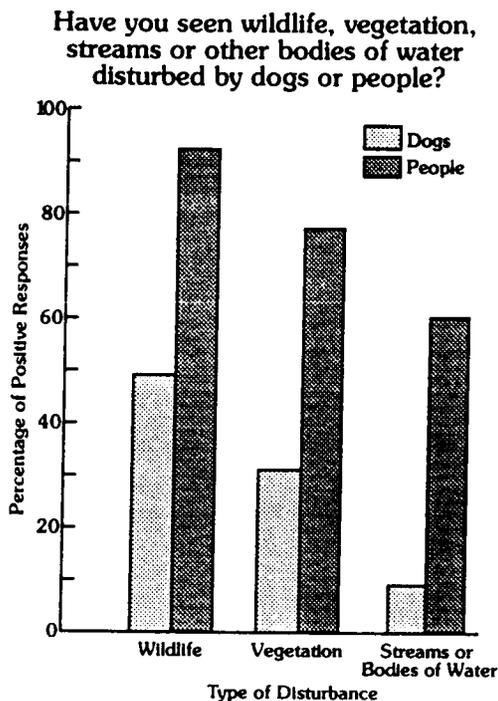
Approximately 800 different dogs were observed for about a total of 150 hours. The behavior of dogs at different locations and at the same locale did not vary significantly (detailed analyses for the different locations are presented in Bekoff 1996b). Off-leash dogs generally travelled less than 2-5 m off trail for fewer than 1-2 minutes (min). For example, in one study ( $n=100$  dogs) at Mt. Sanitas, 30 (=30%) dogs remained on the trail and 45 (=45%) dogs went off trail between 1-5m for less than 1 min. In a second study at Mt. Sanitas ( $n=80$  dogs), 80% of dogs remained within 1-3m of the trail (15% remained on trail and 40% went less than 1m off trail) and in a third study at Mt. Sanitas ( $n=100$  dogs), 93 (=93%) of dogs remained within 5m of the trail. The general impression of observers was that when dogs went far off trail, they were lured off by the people who were responsible for them (e.g. people threw sticks, Frisbees, or went off trail and then called their dogs). It is also notable that only 2 "earnest chases" of wildlife (1 deer and 1 unidentified squirrel) were observed in which it was unambiguously concluded that it was the dog who initiated and maintained the chase. Dogs also only rarely entered bodies of water. Similar behavioral data were collected at Chautauqua ( $n=272$  dogs). In addition, information on dog-dog interactions showed that 20/26 (81%) were friendly (dogs greeted, sniffed, or played with one another) or neutral (dogs passed one another with no physical contact) and 6 (23%;  $p < 0.001$ ) had aggressive (threat) components. All observers noted that dogs off leash were friendlier than dogs on leash, although no detailed data were collected on this aspect of behavior. We also observed 172 dog-people interactions of which 146 (85%) were neutral and the rest ( $n=26$ , 15%;  $p < 0.001$ ) were friendly. When sufficient data could be collected, they indicated that there were no differences in the behavior of dogs in different segments of the trail (1st 100m, 2nd 100m, 3rd 100m).

### Questionnaires

Four hundred and fifty ( $n=450$ ) questionnaires were completed. More non-dog owners (53.2%) than dog owners (46.8%) were polled. Of all respondents, 96.4% were comfortable with dogs, and there were no significant differences ( $p > 0.05$ ) among different locations or between dog owners and non-dog owners. Most people ( $p < 0.01$ ) thought it would lessen the quality of their own (68.3%) and their dog's (82.2%) out-

door experience if dogs had to be leashed. In general, people were more disturbed by large dogs; breeds singled out as threatening (n=35 respondents) included: Rottweilers (35.3%), Doberman Pinschers (20%), Pit Bull Terriers (17.1%), and Chows (14.3%). Many more people reported seeing other people disturb wildlife (92.2%), vegetation (78.0%), and bodies of water (60.5%) significantly more often ( $p < 0.001$  for all comparisons) than dogs (49.7%, 31.4%, and 9.0%, respectively; Figure 1).

**Figure 1.**



The percentage of positive ("yes") responses to the question "Have you seen wildlife, vegetation, streams, or other bodies of water disturbed by dogs or people?" (Questions 18-23, see Appendix A)

While we did not detect any seasonal differences in water use by dogs, it is possible that in the hottest months of the year (when we were not in the field; June-August) they would disturb water more than at other times of the year.

Overall responses to the question "What do you think is the biggest problem facing those who use parks and open space?" are presented in Figure 2. This question was also analyzed separately for dog owners and non-dog owners. A small, but significantly higher percentage of non-dog owners thought that there were too many dogs (10.6%) when compared to dog owners (2.9%;  $p < 0.01$ ), and a significantly higher pro-

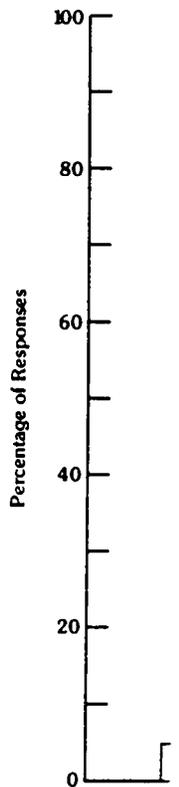
portion of non-dog owners (28.5%) thought that there were too many piles of dog feces left on or near trails when compared to dog-owners (19.5%;  $p < 0.05$ ). Similar percentages ( $p > 0.05$ ) of non-dog owners and dog owners reported that there were too many people (non-dog owners: 47.3%; dog owners: 53.4%), too many unruly dogs (15.5%; 8.0%), and too many unruly people (32.4%; 28.2%). Both groups agreed that people, and not dogs, were the major problem. Regardless of location, respondents indicated that there were far too many people when compared to the number of dogs ( $p < 0.001$ ) and too many unruly people when compared to the number of unruly dogs ( $p < 0.001$ ). Disturbance by people included talking loudly, trampling vegetation, and littering.

Non-dog owners and dog owners were also asked what they thought about a number of different issues centering on purported problems with off-leash dogs. Similar proportions ( $p > 0.05$ ) indicated that there should be standardized obedience tests for dogs (non-dog owners: 48.2%; dog owners: 42.7%), that dogs should not be banned from Open Space (93.3; 98.2%), and that additional areas where dogs could run free should be established (72.3%; 64.3%). A significantly higher percentage of non-dog owners (55.0%) when compared to dog owners (37.3%) believed that there should be an annual fee for dogs using Open Space, that dogs should be on leashes at all times (30.5%; 19.0%), and that there should be stricter enforcement of voice and sight control (76.6%; 66.0%).

## DISCUSSION

The present study was concerned with interactions among domestic dogs, people, and the environment in Boulder, Colorado. There were few noteworthy differences when data were analyzed by location. While some of the results may be specific to this area, there seems to be a more general message that deserves serious attention from those who live in other environs. There is no doubt that some dogs go off trail for various amounts of time and that some dogs do occasionally disturb people, wildlife, and habitat. However, compared to people, dogs did not seem to do much damage to vegetation or bodies of water, and they only rarely chased wildlife. Dog-wildlife encounters are very important to study; however, it is often very difficult to identify precisely what factors directly cause wildlife disturbances (Gentry 1983). People were more disruptive than were dogs, and when dogs did go far off trails they often were lured off by people. There was no trailhead effect and dogs' behavior

**Figure 2.**



Responses to the question (Question 24, see Appendix A)

differed little when they traveled in and when they came to the park.

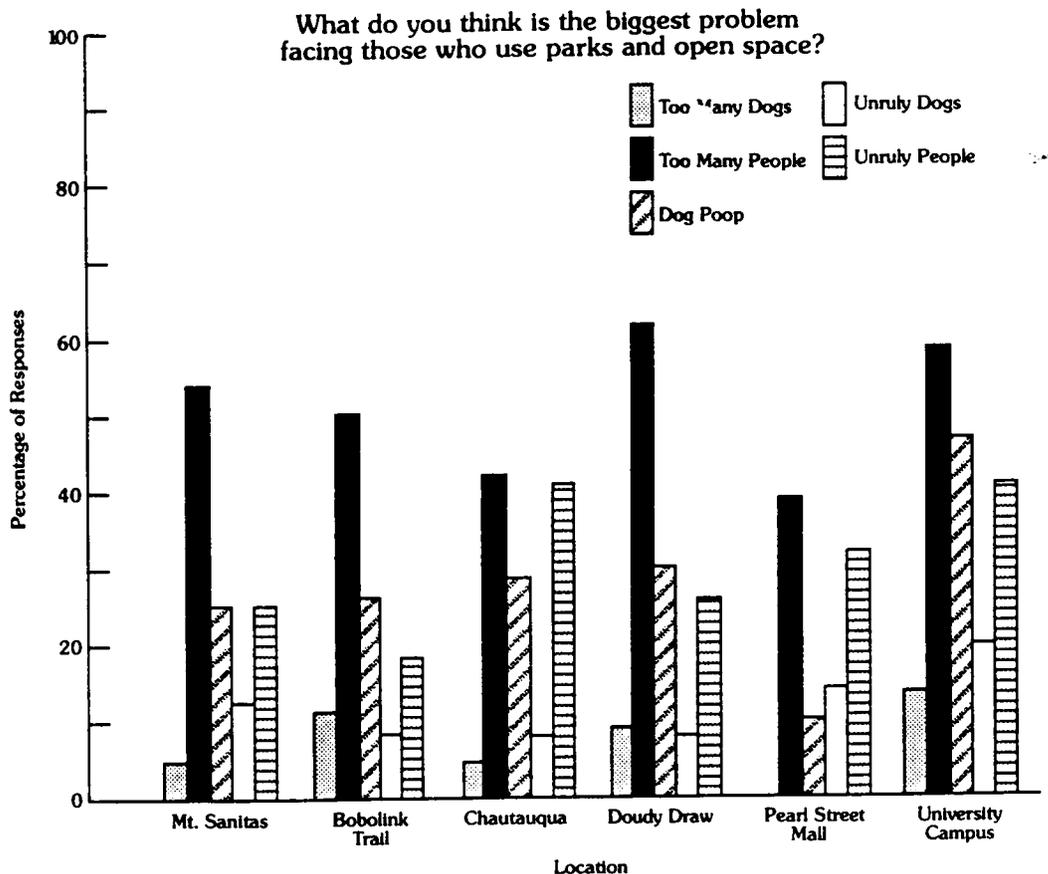
The results of the behavioral questionnaire showed that non-dog owners reported more problems of major people and too many people in Open Space in Boulder. They felt comfortable and reported (and did in fact) that people were more of a problem than dogs, and that people disturbed vegetation and trails. One-third of the respondents reported a problem. They can cause problems, aesthetic; Be more of a problem (1996) than in other areas dealing with this

5%) thought that feces left on or dog owners (19.5; >0.05) of non-dog owners: dog owners: too many unruly dogs agreed that major problem. respondents indicated people when compared to the (0.001) and too (0.001). Disturbance trampling veg-

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Figure 2.



Responses to the question "What do you think is the biggest problem facing those who use parks and open space?" (Question 24, see Appendix A) Numbers total more than 100 because of some multiple responses.

differed little when they first were let free, during their travels in intermediate segments of a trail, and when they completed their walks.

The results of the questionnaire support the behavioral data. In fact, the results of the questionnaire show clearly that dog owners and non-dog owners do not differ in their perceptions of major problems—essentially, too many people and too many unruly people using Open Space in Boulder. Almost 97% of people polled felt comfortable with dogs off-leash. People also reported (and direct observations confirmed the fact) that people disrupt wildlife more frequently than dogs, and people cause more damage to vegetation and to bodies of water. Less than one-third of the respondents reported that feces were a problem. There are many reasons why feces can cause problems (e.g. hygienic, environmental, aesthetic; Beck 1979) and perhaps they are more of a problem in urban areas (Dumont 1996) than in open recreational areas. Boulder is dealing with this problem by placing plastic bags

and trash cans near trailheads and along trails. Interestingly, non-threatening barking by dogs was not an issue for either group. Also, all observers noted that dogs off leash were friendlier than dogs on leash, although no detailed data were collected on this aspect of behavior (see also Thomas 1996).

The relationship between people and dogs has changed greatly in Boulder over the past 25 years. In the early 1970s many uncastrated dogs ran free without their owners. Dogs occasionally formed packs, chased deer and, on at least one occasion, attacked a child. Since then, there appears to have been an increased interest in having well-behaved dogs. In 1980, the Boulder Humane Society regularly offered one obedience class, and in 1996 there are 20 concurrent classes (Nana Wills, personal communication). Dog owners have become more responsible (having their dogs castrated and watching over them more conscientiously), and rarely is a dog seen without their owner or another person in attendance.

We conclude that little needs to be done to manage dogs directly in the areas where we conducted our studies. There are always going to be "problem" dogs and "problem" people. In Boulder and perhaps in other areas, reports of unruly dogs seem to attract a lot of attention, but of course, people do not report when dogs are well-behaved. Additional enforcement may solve some problems but there really are few problems that could not largely be solved by continuing serious efforts to educate people about dog behavior and matters of etiquette and responsibility (see also Beck 1996 and Dumont 1996), and by requiring people to learn more about dog behavior and control of their companions, for people and their companions essentially are a cooperative social unit (Sanders 1990).

The fact that dog owners and non-dog owners did not disagree on important issues (that standardized obedience tests should be required and that banning dogs is not a viable option) also needs to be addressed. Although standardized obedience testing is possible and equally attractive to non-dog owners and dog-owners alike, the implementation of such a practice has not been given serious attention. While the details still need to be worked out for different locations, some possibilities would entail having people attend classes, hire a professional trainer, or train their dogs themselves and then go to their local humane society for testing. A set fee would be established to cover the cost of testing and licensing; the fee might also include a donation to the society.

Further concerns could be addressed by having various stipulations that could cover different sorts of violations. The following suggestions might be helpful for implementing obedience certification. People who were first-time offenders who did not have a license would be given a certain amount of time to complete the standardized test and pay a small fine. First-time offenders who had already received their licenses would

have to pay for, and repeat, the standardized test within a certain period of time, but there would be no fine. However the obedience certification process is implemented, there seems to be little doubt that dogs and people would benefit.

It seems clear to us that the well-being and interests of dogs should not summarily be compromised when dogs and people attempt to share limited space that can be used by all parties for recreational purposes. The methods used and the results from this case study can serve as a model for other locations in which dogs and people compete for limited spatial resources.

## POSTSCRIPT

A recent study of dogs on the University of Colorado (Boulder) campus (Dwyer and Bekoff, unpublished data) showed that leashed dogs initiated contact with humans 5.5 times more than did unleashed dogs, and that people initiated contact with leashed dogs 3.8 times more than with unleashed dogs. Generally, unleashed dogs ignored humans and choose other unleashed dogs with whom to interact when they were not exploring their surroundings.

## ACKNOWLEDGMENTS

We thank Carrie Kull, Ed Leigh, Ron Hamilton, Kristen Gacek, Shelese Pratt, Gary Renne, David Fenyvesi, and Deborah Sapienza for help with data collection, and Myanna Lahsen, Rosalind Yanishevsky, Clint Miller, Ann Wichmann, and Andrew Smith for help with the development of the questionnaire. Rosalind Yanishevsky, Colin Allen, Alan Beck, Robert Eckstein, Ann Wolfe, and an anonymous reviewer provided helpful comments on an ancestral version of this manuscript. Rosalind Yanishevsky suggested how implementation of standardized testing might be initiated. We received financial support from an anonymous donor and the Department of EPO Biology, University of Colorado, Boulder.

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# APPENDIX A: QUESTIONNAIRE

## Perceptions of the Impact of Dogs on Open Space

We are interested in learning more about how dogs and people use open space so that dogs and people can maximize the pleasure that can be had by being outdoors in the limited available space. We hope that you will take the time to answer these questions.

Date: \_\_\_\_\_ Location: \_\_\_\_\_ Time: \_\_\_\_\_ Sex: \_\_\_\_\_ Age: \_\_\_\_\_ Children? \_\_\_\_\_

- (1) Do you live in Boulder? City \_\_\_\_\_  
County \_\_\_\_\_ For how long? \_\_\_\_\_ No \_\_\_\_\_
- (2) How often do you use open space? (a) daily, (b) 5 times per week, (c) 2-4 times per week, (d) 2-4 times per month, (e) less than 1 time per month, (f) 2-4 times per year or less, (g) never
- (3) How long have you used this portion of open space? \_\_\_\_\_
- (4) Why do you come to open space? (a) to exercise myself, (b) to exercise my dog, (c) to see wildlife, (d) to be alone, (e) to enjoy nature, (f) other  
Please rank your top three (3) choices by writing down the appropriate letter:  
\_\_\_\_\_
- (5) In what type of activity do you usually engage? (you can choose more than 1) (a) walk/hike, (b) jog/run, (c) bicycle, (d) equestrian, (e) exercise dog )
- (6) Are you a dog owner? Yes: \_\_\_\_\_ No: \_\_\_\_\_
- (7) Are you comfortable with dogs?  
Yes: \_\_\_\_\_ No: \_\_\_\_\_
- (8) Do you have a dog with you now?  
Yes: \_\_\_\_\_ No: \_\_\_\_\_  
On leash: \_\_\_\_\_ Off Leash: \_\_\_\_\_  
Under excellent voice control: \_\_\_\_\_  
Under control most of the time: \_\_\_\_\_  
Not well-controlled: \_\_\_\_\_
- (9) Do you think dogs should be (a) on leash always, (b) off leash always if dog not a threat to people, (c) off leash in certain areas and at certain times, (d) other?
- (10) Would it lessen the quality of your open space experience if your dog had to be on a leash? Yes: \_\_\_\_\_ No: \_\_\_\_\_  
How: \_\_\_\_\_
- (11) Would it lessen the quality of your dog's experience if your dog had to be on a leash? Yes: \_\_\_\_\_ No: \_\_\_\_\_  
How: \_\_\_\_\_
- (12) Have you ever been attacked by a dog on open space? (a) two or more times, (b) once, (c) never. What were extent of injuries?  
\_\_\_\_\_
- (13) Have you ever felt uneasy when passing someone else's dog? (a) two or more times, (b) once, (c) never.
- (14) In what ways did you feel uneasy? (a) disturbs me, (b) disturbs children, (c) disturbs my dog, (d) disturbs wildlife, (e) too many dogs, (f) dog out of control
- (15) Do certain types of dogs bother you more than others? Yes: \_\_\_\_\_ No: \_\_\_\_\_  
If YES, why: Please provide more details next to your choices  
(a) breed \_\_\_\_\_  
(b) size \_\_\_\_\_  
(c) color \_\_\_\_\_  
(d) behavior \_\_\_\_\_  
(e) sex \_\_\_\_\_  
(f) the behavior of the person with the dog?  
\_\_\_\_\_
- (16) Have you ever felt uneasy in the presence of other people on open space? (a) two or more times, (b) once, (c) never.
- (17) Have you seen other people bothered by dogs? (a) two or more times, (b) once, (c) never.
- (18) Have you seen wildlife disturbed by dogs?  
Yes: \_\_\_\_\_ No: \_\_\_\_\_  
If YES, (a) often, (b) occasionally, (c) never
- (19) Have you seen wildlife disturbed by people?  
Yes: \_\_\_\_\_ No: \_\_\_\_\_  
If YES, (a) often, (b) occasionally, (c) never
- (20) Have you seen vegetation disturbed by dogs in a harmful way?  
Yes: \_\_\_\_\_ No: \_\_\_\_\_  
If YES, (a) often, (b) occasionally, (c) never
- (21) Have you seen vegetation disturbed by people in a harmful way?

Yes: \_\_\_\_\_  
If YES, (a)

(22) Have you water distu:  
Yes: \_\_\_\_\_  
If YES, (a)

(23) Have you water distu way?  
Yes: \_\_\_\_\_  
If YES, (a)

(24) What do facing the

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Yes: \_\_\_\_\_ No: \_\_\_\_\_  
If YES, (a) often, (b) occasionally, (c) never

(22) Have you seen streams or other bodies of water disturbed by dogs in a harmful way?

Yes: \_\_\_\_\_ No: \_\_\_\_\_  
If YES, (a) often, (b) occasionally, (c) never

(23) Have you seen streams or other bodies of water disturbed by humans in a harmful way?

Yes: \_\_\_\_\_ No: \_\_\_\_\_  
If YES, (a) often, (b) occasionally, (c) never

(24) What do you think is the biggest problem facing those who use open space?

- Too many dogs: \_\_\_\_\_
- Too many unruly dogs: \_\_\_\_\_
- Too many people: \_\_\_\_\_
- Too many unruly people: \_\_\_\_\_
- Too much dog poop: \_\_\_\_\_
- Other: \_\_\_\_\_

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(25) If findings suggest that dogs are problematic, do you agree with:

- (a) requiring standardized obedience testing for dogs off leash: Yes: \_\_\_\_\_ No: \_\_\_\_\_
- (b) requiring annual fee and tags for dogs using open space: Yes: \_\_\_\_\_ No: \_\_\_\_\_
- (c) requiring all dogs to be on a leash at all times: Yes: \_\_\_\_\_ No: \_\_\_\_\_
- (d) requiring stricter enforcement for voice and sight control: Yes: \_\_\_\_\_ No: \_\_\_\_\_
- (e) banning all dogs: Yes: \_\_\_\_\_ No: \_\_\_\_\_
- (f) providing areas for dogs on leash and other areas for dogs off leash? Yes: \_\_\_\_\_ No: \_\_\_\_\_
- (g) other \_\_\_\_\_

General Comments

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## **Recreation Disturbance Does Not Change Feeding Behavior of the Western Snowy Plover**

**Megan Warren**

**Abstract** The Western Snowy Plover (*Charadrius alexandrinus nivosus*) is a small shorebird that has many scattered wintering populations along the Pacific Coast of the United States, including several in the Bay Area. This species has been listed as threatened since 1993 under the federal Endangered Species Act of 1973. For this study I measured disturbance rates, types, plover responses and feeding time in three different sites in the San Francisco Bay Area to explore the link between recreation disturbance and feeding behavior. I predicted that as frequency of disturbance increased, the birds would spend less time actively foraging and more time alert. However, data showed no significant relationship between feeding behavior and direct disturbance by human recreators. Instead, I now predict that recreation has a more indirect effect on the western snowy plover feeding behavior. Future research should focus on indirect effects of recreation, such as habitat disturbance and food source quality.

## Introduction

Outdoor recreation has increased in popularity over the years, resulting in expansion and development of designated outdoor recreation areas (Flather and Cordell 1995). Non-motorized recreation, such as hiking, nature viewing, horseback riding, beach bathing and dog-walking have increased the most in popularity (Flather and Cordell 1995). As these activities become more popular, they often disturb and displace wildlife populations, causing them to change specific behaviors and habits. Once-popular breeding sites located in popular recreation areas may be abandoned for less hospitable sites simply due to the amount of disturbance (Knight and Cole 1995).

Shorebirds are especially vulnerable to recreation, which can disrupt available habitat for nesting and foraging (Burger 1995). Recreation can be especially harmful for species already struggling to make a living in a specific area. One such species is the western snowy plover, a small shorebird found along the Pacific Coast. This species has been listed as threatened since 1993 under the Endangered Species Act of 1973 (Smith 1993). Ruhlen et al. (2003) found that on average, more snowy plover (*Charadrius alexandrinus*) chicks died or wandered away on weekends at two beaches in the Point Reyes National Seashore, possibly due to increased recreation on those days. Many other studies on plover species (*C. alexandrinus*, *C. melodus*) have shown that human disturbance leads to changes in habitat use and foraging—both when and how long birds forage, as well as decreased nest success (Lafferty 2001b, Burger 1991, Burger 1994, Lafferty et al. 2006).

Foraging success is a good indicator of nesting success. Shorebirds with habitats more prone to high levels of disturbance spend more time fleeing from and watching for potential predators, depleting fat reserves and time spent caring for their broods (Burger 1991). The western snowy plover forages for both marine and terrestrial invertebrates by visually scanning then probing with its beak in the sand, washed-up seaweed, and low vegetation. Western snowy plover are often found foraging together in small groups (Page et al. 1995). Newly-hatched chicks are precocial, and can walk around and forage for themselves shortly after hatching (Tucker and Powell 1999). Recreational use of plover foraging areas is especially harmful to these newly-hatched chicks (Ruhlen et al. 2003). This study addresses how recreation affects wintering populations of the western snowy plover by examining its feeding behavior at several more

heavily used sites in the San Francisco Bay Area, where the relationship between shorebird feeding behavior and recreation has yet to be fully explored.

Since its inception in 1972, the Golden Gate National Recreation Area (GGNRA) has become one of the most popular and heavily used urban national parks, with more than 10 million visitors per year (NPS 2006). Even before the formation of the park the area was heavily used by recreationists. Many locations within the park are prime breeding habitat for the threatened sub-species western snowy plover (*Charadrius alexandrinus nivosus*), but within the park only wintering populations can be found (Merkle 2006, pers. comm.). Western snowy plover stopped breeding on the beaches in the GGNRA, most likely due to an increase in disturbances from recreation. One of the largest disturbances to western snowy plover, as well as other shorebirds, is dog-walking, especially those off-leash (Lafferty 2001a). In 2002 GGNRA began considering changes to its dog policy. Currently, off-leash pets are allowed in many areas of the park including those important to the western snowy plover—Crissy Field and Ocean Beach (US Department of the Interior 1979). An advisory committee was formed to take place in the negotiated rulemaking, which encompasses the many interest groups with stakes in the rule changes (NPS 2006). Changes in these policies could positively impact populations of the western snowy plover currently wintering in GGNRA, and is important to understand how recreation affects all matters of their biology before making any permanent changes.

It is also important to understand what kinds of disturbances adversely affect foraging behavior. Determining these and other answers are important when deciding how western snowy plover habitat, such as that in GGNRA, should be managed in the future. The main objective of this study is to see how recreation and direct disturbance impacts western snowy plover feeding behavior, which can then be used to create appropriate wildlife management plans. I predict that western snowy plover populations in more heavily-disturbed areas will devote more of their feeding time towards avoiding disturbances than to actively searching for and eating their food.

## **Methods**

For this study, two different kinds of direct observational surveys were developed and carried out weekly for five weeks at three different study sites during February and March 2007.

**Study Sites** Three study sites were used in this research. The first study site was at Crissy Field in San Francisco, California, which is part of the Golden Gate National Recreation Area

(Fig. 1). The stretch of beach where the western snowy plover is found is 100 meters east of the Gulf of the Farallones Visitors' Center (Fig. 2). The beach is 80 meters long and its habitat is characterized by sand dunes with low vegetation. This site supports a population of four to six birds. Crissy Field is readily accessible by car, foot, bike and public transit. This site has also recently (October 2006) changed from an off-leash to on-leash dog area. For this study, Crissy Field was classified as a high-use recreational site. The second study site was the spit at Limantour Beach in the Point Reyes National Seashore (PRNS), located about 56 kilometers north of San Francisco in Marin County, California (Fig. 3).



Figure 1: Golden Gate National Recreation Area, California

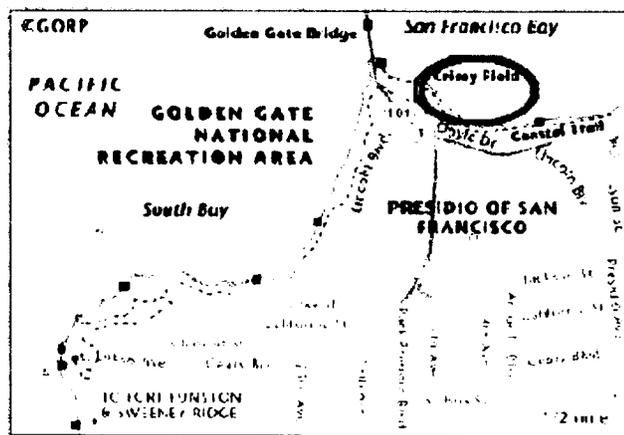


Figure 2: Crissy Field Study Site, in Golden Gate National Recreation Area, CA

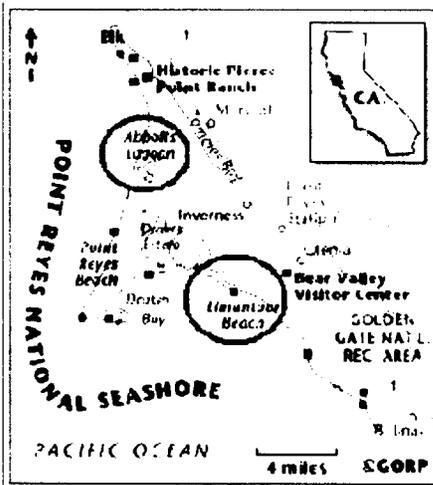


Figure 3: Limantour Beach and Abbott's Lagoon Study Sites, Point Reyes National Seashore, CA

Limantour Spit juts into Drake's Bay and is about four kilometers long, and is characterized by long stretches of beach with little vegetative cover. This site supports a population of 80-100 birds. Limantour Beach is relatively busy, as it is accessible just off a main road near the entrance of PRNS. Any type of recreation is permitted; however, dogs are restricted to the area of the beach away from the plovers. Limantour Beach was classified as a medium-use recreational site. The third study site was also located in the Point Reyes National Seashore at Abbott's Lagoon, which is 16 kilometers

northwest of Limantour Spit on the Pacific Ocean (Fig. 3). Abbott's Lagoon is characterized by low sand dunes with little vegetation, and supports a population of 45-50 birds on a two kilometer stretch of beach at the foot of the lagoon. This site is the most isolated and least accessible of the three sites, and was classified as a low-use recreational site.

**Disturbance Surveys** Disturbance surveys were conducted over a one-hour period just before dusk at each study site. The minimum population size for each survey sample period was four birds. Upon locating the population, date, time of day, general weather patterns and study site were noted at the top of the data sheet. For each instance of disturbance (defined as a recreational activity that could change behavior of the western snowy plover), time, type (individual or group), activity, distance from birds, number of birds disturbed and their response was recorded. The birds' responses were divided into four categories: no response, mild response (causing a resting plover to stand), moderate response (causing a plover to stand up and/or walk away), and major response (causing the plover to flush). The data gathered from these studies were used to create graphs showing frequency of certain types of recreation at each site.

**Feeding Behavior Surveys** Feeding behavior surveys quantified how the plovers budgeted their time during the dusk feeding period. The purpose of these surveys was to observe the percent breakdown of the plover behavior (based on time) and link behavioral changes to nearby recreational disturbances. Over the 30 minutes following the recreation disturbance surveys four different focus-animal surveys were carried out, each time on a different bird. Focus animal surveys were two minutes long. An Olympus digital voice recorder, model VN-3100, was used to measure the total amount of time the bird spent in each of three feeding behaviors. These behaviors were observed and defined during preliminary observation periods. The western snowy plover was seen (1) searching for food, defined as movement along the shoreline with its head down visually scanning for prey; (2) actively foraging, defined as head down with its beak in the sand eating the prey; and (3) time spent alert, defined as a bird standing still with its head up visually scanning the beach. Once transferred to the computer, the recorder shows exactly how many seconds were spent on each activity. A linear regression was used to test the relationship between frequency of disturbance and foraging, alert and searching time.

## Results

Recreation and foraging data were collected at the Abbott's Lagoon, Limantour Beach and Crissy Field study sites over four observation days on a Thursday, Friday or Saturday between February 1, 2007 and March 8, 2007. Western snowy plover do not feed at Crissy Field, so data on recreation disturbance and feeding behavior comes from the two Point Reyes National Seashore sites.

**Recreational Use** Accessibility is the main factor distinguishing recreational use among the three beaches. Not surprisingly, the urban study site, Crissy Field, showed the highest and most

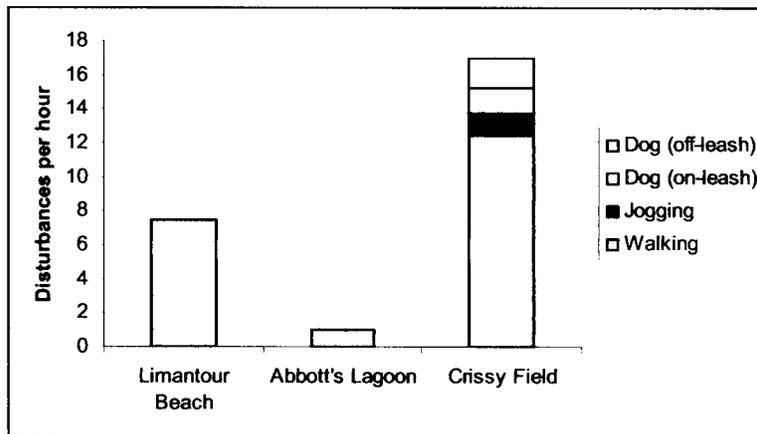


Figure 4: Recreation level and type per hour at each study site

varied recreational use of all the sites (Fig. 4). Limantour Beach, the next most accessible site had the second highest recreational use, though only walkers used the site. Finally, Abbott's Lagoon, the most isolated of the three sites, had the lowest

recreational use. Again, this site was only frequented by

walkers. Both PRNS sites were comparable in terms of type of recreation and foraging data.

**Disturbance Data** The disturbance surveys were used to determine two things. First, they were used to see how strongly resting birds responded in the presence of human recreators. Secondly, they were used in conjunction with feeding behavior surveys to infer changes in foraging, searching and alert time based on how heavily the site was used. Protocol dictated that western snowy plover response to recreators be classified as mild, causing a resting bird to stand; moderate, causing a resting bird to stand and walk away; or major, causing a resting bird to flush. The first part of the disturbance surveys showed by and large that resting plovers do not react strongly to the presence of recreators (Table 1). Since feeding behavior was not observed during any of the observation periods at Crissy Field, useful data came only from Limantour Beach and Abbott's Lagoon. A linear regression with these data shows no relationship between disturbance level and foraging time (Fig 5) ( $R^2=0.0011$ ,  $p=0.86$ ). Similarly, no relationship exists between

disturbance level and alert time (Fig 6) ( $R^2=0.0039$ ,  $p=0.73$ ). A slightly stronger positive linear relationship is found between disturbance level and searching time (Fig 7) ( $R^2=0.046$ ,  $p=0.24$ ); however, this is still an incredibly weak relationship, and cannot be considered significant.

Table 1: Proportion of plover mild, moderate or major response to recreation, by site

		% Plover Response to Recreation				Sample Size
		None	Mild	Moderate	Major	
<b>Crissy Field</b>	<i>Walking</i>	45	9	7	0	190
	<i>Jogging</i>	10	2	0	0	
	<i>Dog (off-leash)</i>	7	3	6	0	
	<i>Dog (on-leash)</i>	6	3	2	0	
<b>Limantour Beach</b>	<i>Walking</i>	59	11	15	15	81
<b>Abbott's Lagoon</b>	<i>Walking</i>	25	37.5	37.5	0	8

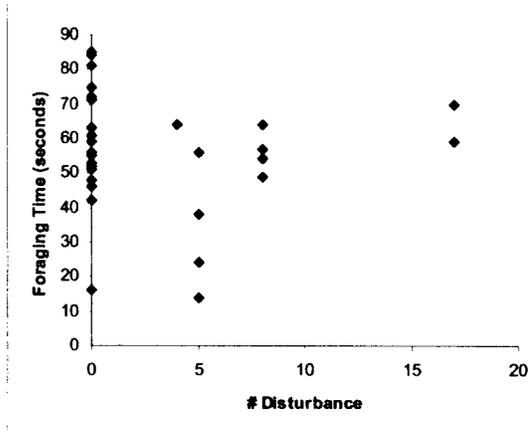


Figure 6: Disturbance level vs. alert time

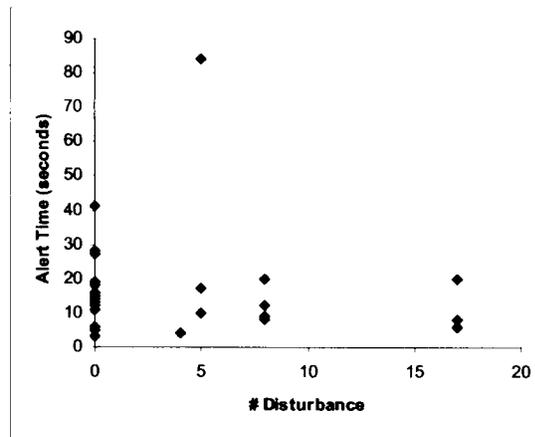


Figure 5: Disturbance level vs. foraging time

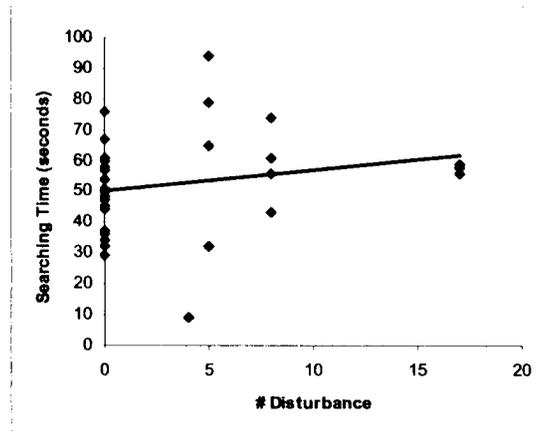


Figure 7: Disturbance level vs. searching time

**Feeding Behavior Data** Crissy Field is the only site at which the birds were not found foraging in the evening, and they are not always at the site. Of six survey dates, they were only on the beach for four of them, and not once were they foraging. When the birds are at this site, they begin to get restless around 5:45 p.m. and soon fly away, presumably to go forage in a different area. Data from Limantour Beach and Abbott’s Lagoon suggest that no significant

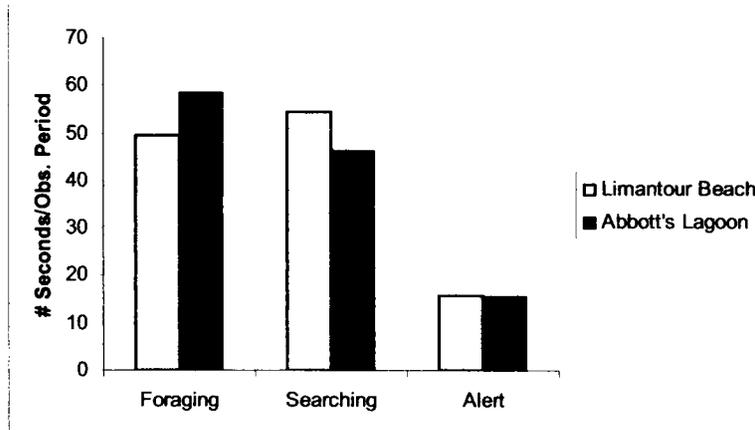


Figure 8: Average distribution of three feeding behaviors by over 2-minute focus-animal surveys

relationship exists between disturbance level and foraging behavior. Therefore, it can be assumed that the absence of foraging western snowy plover at Crissy Field is due to other factors, such as quality of the food source available at the site.

Average times for the three observed feeding behaviors are consistent between the Abbott’s Lagoon and Limantour Beach data (Fig. 8), which also suggests no relationship between disturbance level and feeding behavior. Limantour Beach was a site with medium disturbance levels, and Abbott’s Lagoon

was a site with low disturbance levels. Both sites had between 10 and 20 birds on each observation day.

### **Discussion**

This study looked at links between disturbance level and foraging behavior of the western snowy plover at three different beaches in the San Francisco Bay Area. The Crissy Field study site did not provide any relevant results, however, the data from the two Point Reyes study sites do not support the hypothesis that western snowy plovers in more heavily disturbed areas devote less time to actively foraging and more time to being alert.

Data show no significant correlation between number of disturbances and time spent actively searching or foraging, or being alert while feeding at dusk. These results suggest that direct recreation disturbance is not as significant as earlier thought, and that links between recreation and western snowy plover feeding behavior are more subtle. Several possible explanations exist for explaining these relationships. The data suggest that as more disturbances occur, more time is spent on searching than on being alert or foraging. Though not significant, this relationship does bring to mind other possible explanations of the trend indirectly related to recreational use at certain sites.

Accessibility and disturbance are two possible explanations for increased searching time at more heavily used sites. At Limantour Beach, recreational use tends to be right at the shoreline, which is also where the western snowy plover forage. With an overall higher recreation use than Abbott's Lagoon, Limantour Beach may have a more disturbed habitat at the shoreline, which could make less overall food available, or just make it harder to find. Another explanation could be absence of biological debris, such as seaweed, kelp, and dead or decaying sea birds and mammals. Since Limantour Beach is used by more people, biological debris is either displaced or removed. This debris has been proven to be an important food source for shorebird communities in southern California (Dugan et al. 2003), and its removal could force the western snowy plover to spend more time searching for food along the disturbed shoreline. Finally, poor food source quality has been linked with failed hatching of western snowy plover eggs due to high mercury levels at Point Reyes Beach (Schwarzbach et al. 2005). Pollution may be an indirect result of recreation that may cause western snowy plover to spend more time seeking out

suitable food. Quality of the food source itself is very important for the continued success of this species.

The western snowy plover is affected by recreation, albeit indirectly (such as with shoreline disturbance). Future studies should focus on both the quality of the food source and the habitat disturbance at important breeding and wintering sites for the western snowy plover. More vigorous methods should also be developed for monitoring feeding behavior in order to take into account not only the time spent doing each activity, but also where the western snowy plover choose to forage, and what they choose to eat. Studies should also focus on the relative disturbance of foraging habitats. A more careful selection of study sites must take place. It is important to find habitats with varying levels of recreation and habitat disturbance where the birds are known to spend time feeding. Though this study had a range of disturbance levels at each site, feeding habitat was not suitable at Crissy Field and therefore not observed. Furthermore, the data from Limantour Beach and Abbott's Lagoon showed extremely weak to non-existent correlations that cannot be extended to Crissy Field. It is important to keep monitoring western snowy plover populations to detect any changes in their behavior (foraging or otherwise).

This research project is perhaps more useful as an education tool. If anything, increased monitoring of bird populations will make people more aware of their presence. The snowy plovers can be difficult to see, but are really interesting to watch. If recreationists are aware of their presence, they can conduct their activities in a way that still allows them to have fun, but to decrease their affect on wintering populations of the western snowy plover.

### **Acknowledgements**

I would like to thank John Latto and the entire ES 196 crew for their support and input throughout the entire length of the project. I would also like to thank Sarah Reed, Bill Merkle from the National Park Service and Samantha Murray and Matthew Zlatunich from the Golden Gate Audubon Society for their help in putting the project together.

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Group Hotline: 415-977-5578 Fax: 415-977-5799

May 26, 2009

Bill Wycko  
Planning Dept.  
1650 Mission St., suite #400  
San Francisco, CA 94117  
Fax: 558-6409  
RE: Case Number 1912E Natural Areas Management Plan

Dear Mr. Wycko,

The Sierra Club is in general very supportive of the current iteration of the Significant Natural Areas Management Plan, and we are pleased that the process of environmental review is finally underway. The following are some technical comments regarding the scope of the review work which we feel should be addressed.

With regard to the significant natural areas located in San Francisco, we note that the plan itself adopts a hierarchical approach by dividing the natural areas into three separate categories (MA1's, MA2's and MA3's). While such an approach is useful for establishing priorities, it creates a patchwork situation which is less than ideal for planning purposes. In general, we would like to see a maximum restoration alternative studied for each of the city's natural areas. Of special concern are those areas, generally designated as MA3's, which contain stands of non-native trees. The study should address the effects of allowing unchecked growth of these non-native forests on the significant natural resources, as well as alternative scenarios for management of these sections, for instance by managing the understory for biodiversity, thinning, and allowing for a natural succession with the goal of eventual re-establishment of native plant communities.

For the treatment of Sharp Park and the Laguna Salada Enhancement plan, our understanding is that the DEIR will include the three alternatives (no-golf, 18-hole and 9-hole) approved by the city's Board of Supervisors. We believe that in each of these alternatives, the lead criterion should be the protection of habitat for the listed species. It is especially important that elaboration of these scenarios proceed according to the best available science, with the end of maximizing critical habitat for these species.

We look forward to the release of the DEIR, which we hope happens in a timely manner.

Yours truly,

  
Steven Chapman (for the San Francisco Group)

RECEIVED

TO: Bill Wycko, SF Planning Dept, Natural Areas Management Plan,  
1650 Mission St., Suite 400, San Francisco, CA 94103

MAY 26 2009

May 22, 2009

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
M E A

RE: Neighborhood comments and Criticism and Protest of Environmental  
review of Project title: Natural Areas Management Plan  
Case No. 2005.1912E

Project size: 1, 105 acres.

Attached is a General comment on the general flaws and misconceptions of the plan.

In this section we will comment on Specific Details of the plan which are false, misleading, have no scientific merit, and have potential for great harm to our City.

The Natural Areas Program , instigated by zealots who regard native plants as 'good' and non-native as 'bad', has no scientific basis. For some reason they refer to eucalyptus trees as 'weeds' and the underlying motive of this project is to kill and destroy these beautiful trees.

FIRE: The threat of fire is a transparent ruse, used to generate fear in attempt to justify killing of healthy trees.

There has not been a serious fire in Sutro forest for over a hundred years. The commonly repeated myth that eucalyptus is prone to fire and 'native trees are fire resistant is just that, a myth. All wood is flammable. There is NO evidence of significant advantage benefit of native trees, in fact there is no good definition of which trees are native. Try to burn a dry eucalyptus log in your fireplace and you will find it very difficult .

The forest is damp to wet most of the time and the winds predominantly from the West. The forest pulls moisture from the fog in vast amounts. Tree removal has potential to dry out the area. If dry native grasses replace trees, the threat of fire may increase.

WIND PATTERNS:

Cutting down trees must alter the wind patterns. Most of the homes close to the forest are protected from winds by the forest, Tree removal has potential to INCREASE fire hazard by removing this protection.

Micro climates: Belgrave Ave is a good example. The street is generally calm with mild breezes. On Tank Hill at the East end, farther from the forest and at higher altitude, the winds are often 40 knots and more as there is no wind

protection. The same situation applies up to the top of Twin Peaks and to all the neighborhoods in the lee of the forest. These strong winds would only INCREASE the risk of fire.

#### Effects on WATER COLLECTION, DRAINAGE:

The forest pulls down thousands of gallons of water from the fog bank. Without tree roots to hold the ground what might happen to run off?

Without tree roots what is the potential for landslides and earth movement ? (let us not forget earthquakes). Earth movement has potential for people and property damage.

#### CARBON DIOXIDE EFFECT:

The program dismisses the beneficial effect of the forest in carbon dioxide removal and suggests that the small native plants will do as well.

This is preposterous pseudo science at its worst. Environmentalists bristle at the destruction of the Brazilian rain forest, and here there is intent to destroy an exquisite forest in the centre of our City! To suggest that native plants would be more effective than the forest is absolute nonsense.

AN IMMEDIATELY ADJACENT PROJECT currently intends to remove trees on 14 of 61 acres, about 25% of the forest owned by UC. The natural Areas program also wants to remove trees on the portion owned by the city, so that 1/3 of the forest would be stripped. The forest does not recognize a UCSF/city boundary line. Each affects the other and is not addressed in the plan.

#### HERBICIDES:

They indicate all the cut trees and brush will be 'painted' with herbicides. This would be thousands of gallons of herbicide, which will eventually wash away and contaminate. Numerous underground springs underly these areas.

WATER USE: Any native plantings require extensive irrigation systems, costly, and consuming water which may be in limited supply. The previously planted areas with native plants required installation of expensive irrigation systems and increases water consumption.

#### MOST IMPORTANT:

The law requires a full Environmental Impact Report before huge projects like this be undertaken. The EIR requires response to 18 (eighteen) items of concern.

This project as outlined at the public meeting, chooses to arbitrarily ignore many of the 18 items. It does not require 'experts' to see the potential harm and unforeseeable risks here. It just takes residents of the neighborhood who walk the

areas daily. This leads one to question the qualifications and the motives of the "consultants". I am told they do not have a certified arborist on their staff. I believe that no consultant has actually walked through Sutro forest or the neighborhood!

Many in the neighborhood have a profound distrust of those involved in this project. There are of course well meaning people who have been misled by the propaganda of the native plant zealots and accomplished bureaucrats.

The native plant advocates are intent on destroying eucalyptus trees, and experimenting with plants that may not survive in a modern setting.

In their zealousness they are promoting misinformation and attempting to circumvent the intent of the law, ie EIR reporting of 10 issues.

The neighborhood will be watching very closely to see the Intent of EIR laws is met.

What is proposed here is an experiment, with unpredictable results and little or nothing to be gained.

#### ECONOMICS:

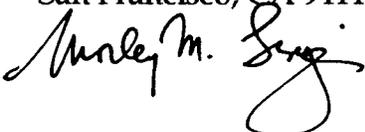
Our Country, our City and our State are in the midst of unprecedented severe economic crisis. Our National leaders have asked us to help and take some personal responsibility.

When the Mayor indicates we may fire 1000 employees, cut back on essential services, when the State has billions of deficit, when people are still homeless in New Orleans, when the University announces need to increase student fees, does it seem 'right' to spend vast amounts on a purely elective project, that is ill conceived at the start? I repeat, Purely Elective and potentially disastrous.

#### Addendum:

We, the neighborhood support the more detailed objections and criticisms submitted by Nancy Weurful and Mary McAllister . We are in the process of consolidating lists of neighbors but submit this now because of time constraints imposed with short notice.

Morley Singer M.D.  
177 Belgrave Ave.  
San Francisco, CA 94117





SAN FRANCISCO  
SPCA

RECEIVED

MAY 25 2009

CITY & COUNTY OF SAN FRANCISCO  
PLANNING DEPARTMENT  
TECHNICAL DESK

OFFICERS

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Treasurer

JAN McHUGH SMITH  
President

May 26, 2009

Mr. Bill Wycko  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street  
San Francisco, CA 94103  
RE: Significant Natural Resource Area Management Plan (SNRAMP),  
Environmental Impact Report, Case No. 2005.0912E

Dear Mr. Wycko:

As the largest animal protection organization in San Francisco, The San Francisco SPCA (SF/SPCA) has a vested interest in the Significant Natural Resource Area Management Plan and we appreciate the opportunity to offer our recommendations regarding the scoping for the Environmental Impact Report.

**Our Concerns:**

GR-7: Predators: In section 5 "GENERAL RECOMMENDATIONS" of the 2006 SNRAMP the need for feral cat control is described as 'urgent'. However, there have been no scientific studies to determine the impact of feral cats or any other predator in San Francisco's Natural Areas. We do know that the Natural Areas Program website tells us that "Pollution, habitat loss and fragmentation, and invasive species all make it difficult for native plants and animals to survive in the city." Therefore, we do not accept that predators including feral cats play a major, much less an "urgent," role impacting wildlife in our parks and open spaces.

GR-7a: Refers to the Quail Recovery Plan: While this organization is in agreement with the general premise of the Quail Recovery Plan, the Plan does not define the circumstances that would require removal of a predator, how those circumstances would be proved, and what impact removal of a predator from the location would have on the rest of the environment , prior to ordering its removal.

DIRECTORS

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GR-7b: While The SF/SPCA agrees that feral cat populations are initially generated by irresponsible breeding, the proposal to eliminate the release of cats into the wild is unrealistic and ineffective. On the contrary, Trap-Neuter- Return programs (TNR), when coupled with the adoption of tame cats and kittens, can maintain and will eventually decrease the population of feral cats (*Journal of the American Veterinary Medical Association*. 01/02/200302/2003;222(1):42-6. ISSN: 0003-1488).

GR-7c: “To the extent possible, all predator control shall be performed in a humane manner, such that harm and suffering to the animals is minimal.”

The SF/SPCA continues to oppose the premise that “minimal suffering and harm” to animals is acceptable. There is no way to determine what this phrase means, what is minimal and what is not, and who is evaluating the level of suffering. Unfortunately, this language is too subjective to be protective of animals.

#### **Our Recommendations:**

1. GR-7a: Feral cats should not be assumed to be the predator in question without clear evidence.

2. GR-7a: The SF/SPCA deeply appreciates the Recreation and Park Commission’s amendment to the Management Plan that elevates the recommendation of feral cat relocation to require their review and approval. For the record, this amendment was made on August 21, 2006 to Resolution Number 0608-012 which states; *“That where appropriate in the plan that feral cat relocation shall be implemented only upon a determination by the Commission that other methods of population reduction failed to adequately reduce cat populations in natural areas.”*

We request that the SNRAMP reflect this additional language in GR-7a.

3. GR-7a: Clarify what scientific measures will be used to determine if a predator is negatively impacting a Natural Area and require those measures to be proven prior to considering a removal plan.



SAN FRANCISCO  
SPCA

4. Please remove GR-7b. Acknowledge that eliminating the release of cats in San Francisco is an impractical objective and instead support the positive impact the SF/SPCA Feral Fix Program has had on Natural Areas and all parks and open spaces since 1993. During this time, the SF/SPCA has subsidized the sterilization, adoption, release of thousands of felines and has seen a reduction in feral cat populations throughout this community.

5. GR- 7c: This must be rewritten to remove the subjective language that allows suffering. Humane measures exercised under the control of San Francisco Animal Care and Control should be stressed.

The SF/SPCA would like to see in the future a well designed, long term, scientific, and objective study to evaluate both the positive and negative impacts of feral cats in the urban environment of San Francisco. Only then will we have a basis for a dialogue about feral cats based on facts. We recognize that the EIR process is not in a position to provide the resources and time for this study, but we do acknowledge the need for this information. The SF/SPCA continues to pledge itself to providing support for the TNR program that has contributed so greatly to the control of feral cats in San Francisco.

Sincerely,

Jan McHugh-Smith  
President

**To:**

Mr. Bill Wycko  
San Francisco Planning Dept  
Natural Areas Management PPlan  
1650 Mission St, Suite 400  
San Francisco, CA 94103

**From:**

Lisa Vittori  
P.O. Box 31897  
San Francisco, Ca. 94131  
(415) 931-3075  
lisavittori@yahoo.com

**RE:**

Natural Areas Management Plan

Dear Mr. Wycko--

I am writing to express concern about the Natural Areas Management Plan as now written. Although I could discuss each site in as much detail as the plan itself, I will spare you. In short, the plan severely limits access to, and recreation in, areas now commonly used by a wide variety of citizens. It makes inaccurate and misleading assumptions about the level of present and future use, and the impact of those uses upon natural systems. It uses the excuse of "endangered" species to restrict access to many areas in which those species either do not exist or in which they are currently co-existing peacefully with other uses.

As background, I have worked professionally as a naturalist and restorationist for the last 35+ years. I worked with the National Park Service on their restoration programs as both a crew supervisor (with the California Conservation Corps) and a field biologist. I began my career as a planner and permit appeals analyst with the California Coastal Commission, specializing in access and wildlands issues. Over the years I've volunteered on many restoration projects, usually with my dog(s) and various children in tow. I've supported both restoration and public access over my career, and am dismayed to now see restoration used as a weapon to keep people out of public lands.

Over the last 10-15 years, I've watched as one site after another was either closed to public use or severely restricted. I've also seen agreements made and broken, most notably with the dog-walking community, but with others (horse-riders, cyclists, bird-watchers, golfers, day-camps) as well. Even if access was supposed to be restricted temporarily, the restrictions almost always became permanent. In turn, recreational pressure increased in other areas, producing more calls for restrictions.

A good example is the closure of many areas for dog-walking (assume this means walking with one's well-behaved off-leash canine companion). In the early to mid 1990's many popular dog-walking places on the Peninsula were abruptly closed, ostensibly for "environmental reasons". More people started coming to Fort Funston, some from as far away as Palo Alto. At the same time the GGNRA wanted to "restore" Fort Funston, and fenced many acres off for what was supposed to be a five year period (that was 15 years ago!). Similarly, battles in many local parks led to restrictions on neighborhood dog-walking. Suddenly Bernal Heights, Glen Park, and McLaren Park became more heavily used by citizens who needed to **walk** (not just stand) daily with their dogs.

Rec and Park's solution has been to build what they call DPA's. Some are walkable; most are not. Now the Natural Areas Program wants to restrict or eliminate these, too. There are many

problems with this; I will name just five: 1) This is not in the Natural Areas Program's jurisdiction, in part because (2) there have been agreements made over time through the Dog Advisory Committee and the Dog Policy to add more DPAs. 3) The Natural Areas Program **assured** us when a management plan first came out that they would work with the dog community and ensure that we could continue to utilize these areas for dog-walking. 4) The management plan also stipulates that before new "DPA"s are added extensive environmental studies would have to be performed. Historically, this means that they will ignore the existing heavy use of an area for dog-walking and pretend that they are starting with a pristine area that would be impacted by a new use. 5) Instead of finding ways to integrate native species into public areas, they plan to instead introduce threatened species and deny access.

Thank you for your time and attention. Lisa Vittori

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Mr. Bill Wycko  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission  
San Francisco, CA 94103

May 25, 2009

MAY 26 2009

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
RECEPTION DESK

RE: Significant Natural Resource Area Management Plan (SRAMP), Environmental Impact Report # 2005,0912E

Dear Mr. Wycko:

I have been involved with working to humanely reduce feral cat populations since the late 1990s both in San Francisco and in Italy. I have participated in trapping and sterilizing feral or community cats in San Francisco for the last 9 years and during that time have witnessed a marked reduction in the number of cats in the colonies with which I have been involved. When adult cats are spayed and neutered and kittens taken for adoption a group of feral cats can be immediately reduced by 50%.

There are fewer and fewer feral cats in the areas of the city that come under the jurisdiction of the Natural Resource Area Plan. The cats that there are sterilized, fed and monitored. Any new cat that shows up is taken to be spayed/neutered. Often these are recently abandoned cats that have not yet become wary of people and they find new homes.

In San Francisco the need to remove feral cats becomes less pressing every year, yet there are numbers of people who think cats are increasing in population rather than dramatically decreasing. The SF/SPCA has been offering free feral fix since the early 1990s. As a result of this program, thousands of cats have been spayed/neutered and hundreds of thousands of cats have never been born.

I believe that because of the cat's relationship to people as a companion animal, a relationship not shared with other wild animals such as crows, skunks, possums, foxes and raccoons, feral cats have become a stand-in for humans and the problems we have caused to the environment. Feral cats are not a significant problem and should not be singled out. There is no 'urgent' need to remove them as is stated in G.R. 7a, G.R. 7b and G.R. 7c.

The G.R. section in the Environmental Impact Report needs to be removed. It is made up of unproven suppositions not based on what has been happening in San Francisco over the last 15 years.

Thank you.



Susan Wheeler

President, Friends of Roman Cats

Member of CAT that deals with feral cats issues in conjunction with the SF/SPCA

May 26, 2009

L-Danyielle Yacobucci  
845 McAllister Street, #C  
San Francisco CA 94102

Bill Wycko  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street  
San Francisco Ca 94103

RECEIVED

MAY 26 2009

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
RECEPTION DESK

Dear Mr. Wycko:

RE: RE: Significant Natural Resource Area Management Plan (SNRAMP),  
Environmental Impact Report, Case# 2005.0912E

The Initial Study states, "Topics are included in the EIR if there is not sufficient information available at this time on the potentially affected resources or site conditions."

I have considerable expertise on issues regarding feral cats. Presently no one knows what their impact is on San Francisco's environment and are only using speculation based on a lack of knowledge and expertise.

I believe that the General Recommendations for Predators G.R.7a, G.R.7b and G.R.7c as they stand are extremely flawed. The Natural Areas Program states under G.R.7 that feral cats are an urgent matter. This statement is from Ms. Huntsinger and Mr. Bartolome's review and their scientific expertise does not include feral cats.

The facts are that there are only a few feral cats in the Natural Areas in San Francisco. These feral cats are all fixed, fed, monitored and not hungry. Since 2006 because of San Francisco SPCA's Feral Cat Program there are fewer feral cats in the Natural Areas and in all of San Francisco.

What is the justification for feral cats to be described as an "urgent" matter? What exactly does this mean? What studies have been done *in San Francisco* that show and prove this? Studies that are done in other areas of the United States do not prove that feral cats are an "urgent" matter in San Francisco.

Why is the feral cat the only predator that is called an urgent matter? There is no evidence, observational material or scientific studies done in San Francisco proving that. Other predators greatly outnumber feral cats in San Francisco. Feral cats are not the primary reason for losses due to preying. Feral Cats are being singled out for no legitimate reason and possibly just for ideological bias.

Here is a list of other predators in these same natural areas as listed in The Presidio Implementation Plan, Golden Gate Audubon Society; and Save The Quail Campaign, Setting and Site Assessment, LSA Associates, Inc.:

Western Scrub-Jay, Common Raven, American Crow, Cooper, Sharp Shinned Red-Tailed Hawk, owl, gray fox, striped skunk, northern raccoon, domestic cat, California ground squirrel, and red fox.

Then there are other predators in the NAP areas such as coyotes, feral pigs, frogs, snakes, cormorants, herons, turtles, badger (potential), mice, rats, bats, bobcats and of course Humans.

To give you a few specific examples--Raccoons eat bird eggs and young and adult animals. . . Skunks will eat bird eggs and young animals. . . Possums will eat bird eggs and young animals. . . Ground squirrels will eat bird eggs and young. . . Jays, ravens and crows will kill and eat anything, including bird eggs. . . Herons will eat anything that fits in their mouth. . . Raptors and owls will kill and eat anything they can catch. . . Coyotes and fox will kill and eat anything they can catch. . . Mice and rats will eat anything, etc, etc., etc....

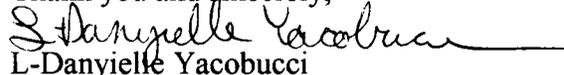
My point is that there are many more predators than feral cats in the natural areas of San Francisco. Feral cats are being inappropriately singled out as the most dangerous predator, the one that does the most harm and kills more than any other predator. There is no scientific basis for this conclusion and the impact of feral cats is not accurately understood. Their predation could even be quite limited. Keep in mind that predators also have positive impacts such as rodent control and maintaining balance in the environment. *A clear definition of what a predator is must be put in the Glossary.*

In the Initial Study under G.R. 7a, it states "implement the feral cat control policy from the Quail Recovery Plan" (QRP) passed in 2004 by the Board of Supervisors. There is no feral cat control policy mentioned in the QRP. The QRP only uses the word "predator" and states that quail recovery must be done *without killing other animals*.

The control of any predator should be undertaken only in situations where it is clearly demonstrated with hard proof that they are having a negative effect on an area. Any control program must be developed with the expertise and humane practices of San Francisco Animal Care and Control and the San Francisco SPCA.

All of G.R. 7 as it stands is unacceptable. It must either be removed or completely revised in cooperation with San Francisco Animal Care & Control and the San Francisco SPCA.

Thank you and sincerely,



L-Danyielle Yacobucci

Feral Cat Expert

Bachelor of Arts Degree, Psychology,

San Francisco Resident

Comments Re Initial Study for the SNRAMP - May 18, 2009

RECEIVED

My comments are in reference to my experience in the Oak Woodlands Natural Area.

I suggest that the EIR of NAP Management Plan take seriously the boots on the ground experience of local habitat restoration volunteers.

My view is that Oak Woodlands are about 3 % of GG P and represent a fraction of what remains of original Coast Scrub and Oak Woodland habitat that predates the Park. Our experience with very large introduced tree canopy ( blue gum eucalyptus and monterey pine/cypress ) and varieties of smaller but pervasive and invasive tree species indicates that the Natural Areas mandate to protect these remnant habitats must trump the often misguided attempts to " protect " trees.

In the Oak Woodlands, very few, if any of the large canopy trees have been cut but they are very problematic and in some places should be removed.

A lot of the invasive ' monocultural ' shrubs and trees have been cut to enable healthy growth of original natural habitat and in fact we replant more than an equivalent amount of native forbs, shrubs and trees to restore aesthetic and habitat balance.

We also have cut invasive monocultures to reduce the danger of fire ( the Oak Woodland has suffered fires caused by vagrant campers ) and also to clear overgrown areas that provide cover for illegal camping and trash accumulation.

For this reason, among others, I strongly urge extra penalties ( at least a misdemeanor arrest) for those who camp in Natural Areas.

The overlapping GG P jurisdiction ( RPD - GG P management is not always on board with Natural Areas staff due to turf and bureaucratic squabbling ) produces a less than satisfactory record in coping with these issues .

This indicates to me that Natural Areas must have the clear mandate to completely regulate the core of the natural area, MA-1 , AND adjacent zones, MA-2 , MA-3.

I think that these current ' tri - level ' natural area designations are a recipe for fragmented management and undermines the mandate of Natural Areas to regulate, restore and steward these places based on science, factual evidence and common sense.

In regard to dogs - as of now everyone is free to use such restored places as Oak Woodlands' Coon Hollow - but if it becomes obvious that dogs digging, pooping and peeing in this place produce significant impact then Natural Areas must have the absolute right to require limits to dog use.

Overall, the Natural Areas mandate to restore and steward the tiny remnants of our ' original' natural habitats in this regional urban environment require some sacrifice on the part of narrow interests that don't put sustainable natural habitat front and center.

I think it is quite obvious that we continue to lose planetary biodiversity - we must do better.

ROBERT BAKEWELL <[rcbakewell@yahoo.com](mailto:rcbakewell@yahoo.com)>  
Volunteer Steward for SFRPD Natural Areas Program  
Oak Woodlands Restoration - GG Park  
863 Arguello Blvd. # 5 , SF CA 94118  
SF CA 94118  
415-710-9617



MAY 27 2009  
CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
M.S.A.

May 25, 2009

**RECEIVED**

**MAY 27 2009**

**CITY & COUNTY OF S.F.**  
PLANNING DEPARTMENT  
M E A

To: Mr. Bill Wycko  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

From: Denise Lapins  
15 Belgrave Avenue  
San Francisco, CA 94117

Re: Project title: Natural Areas Management Plan  
Case No. 2005.1912E

Dear Mr. Wycko:

I and my family have lived immediately adjacent to Tank Hill, a so-called 'natural area', for nearly twenty years. At the opposite end of our small street lies another so-designated site, the interior greenbelt of Sutro forest, managed under the auspices of the RPD Natural Areas Program (NAP), and the subject of comments herein because of the proposed Management Plan involving clear cutting of 140 or more mature trees in that specific area. This decision to convert existing forest adjacent to neighboring homes to a sensitive plant museum has been made without proper scientific study or input from residents.

I am writing to request that the Planning Department demand more studies – assessments with forest-specific expertise on the part of the consultants, unlike the Initial Study provided by Tetra Tech. Such studies are needed in order to fully evaluate the substantial impacts that would result from the loss of the trees noted in the NAP Management Plan.

The history of this neighborhood and the NAP is rich with conflict, stemming primarily from documented clandestine clear-cutting of trees atop Tank Hill. One only need regard this site to witness an unfortunate example of the effects of wholesale tree removal. Winds blow with extreme force without the buffer of mature trees and of the native flora planted there (with the help of neighbors, I among them) few plants survive today. The total area of the site is far smaller than the interior greenbelt just 2/10s of a mile away, and the evidence from the Tank Hill experience bodes poorly for the greenbelt proposal.

While the reasons to require more studies are legion, I will focus my remarks and questions on a few key points:

Geology: How do we know that erosion problems resulting from the loss of trees will not be incurred upon the neighboring homes? What will be the effects of herbicides to immediate neighbors, animal and insect denizens of the forest, and others?

While the forest is managed under two jurisdictions it nonetheless exists as a single entity, with the university and the NAP overseeing a combined total of 61 acres of Sutro forest. The university currently proposes clear-cutting a total of 14 +/- acres of trees, which is more than 20% of total forest acreage. How have the combined effects of such significant deforestation been evaluated? How have the risks to both people and property been evaluated in light of the fact that deforestation will be upslope from residential areas adjacent to the greenbelt? How has the City evaluated the cumulative effects of the UC/FEMA grant proposal along with the NAP Management Plan?

This EIR must evaluate this cumulative effect on the entire Sutro forest of both management proposals.

Biology: What is known of the effects of removing established trees as proposed? What will be the effects of the health of the forest in its entirety with this type of periodic and spotty tree removal?

Recreation/Land Use: One of the reasons this management plan is so controversial is because of the restriction of access to the public of their own public land. The interior greenbelt contains the Belgrave trailhead into the forest from the east. Neighbors and visitors use this greenbelt area on a year-round basis. Sensitive habitat plantings will restrict use to a degree unknown. The impact of these plantings on our use has not been quantified.

As your charge to implement CEQA, which defines 'environment' as the 'existing setting', I respectfully request that the Planning Department provide for a comprehensive scientific Environmental Review to evaluate the above-stated concerns on our current environment. Such a report will address the deficiencies in the Initial Study and allow the effects of the scope of the Management Plan to be fully and scientifically evaluated.

Thank you for your attention to these important concerns. I appreciate the opportunity to contribute to this important Management Plan.

Sincerely,

  
Denise Lapins

cc: SF Recreation & Park Commission  
Supervisor Ross Mirkarimi, Dist. 5  
Belgrave Neighbors  
Twin Peaks Improvement Association



**San Mateo County  
Mosquito and Vector Control District**

1351 Rollins Rd  
Burlingame CA 94010  
(650) 344-8592 Fax (650) 344-3843  
www.smcmad.org

**RECEIVED**

MAY 27 2009

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
M E A

Date: 5/26/09 Time: \_\_\_\_\_

Deliver to: Bill Wycko

Fax Number: (415) 558-~~6278~~ 6409

From: Chindi Peavey

Number of pages including coversheet: 3

Subject or Message: Natural Areas Management  
Plan EIR

If this transmission is incomplete or you have any questions,  
Please contact sender at (650) 344-8592



**San Mateo County  
Mosquito and Vector Control District**

1351 Rollins Rd  
Burlingame CA 94010  
(650) 344-8592 Fax (650) 344-3843  
www.smcmad.org

To: Bill Wycko  
San Francisco Planning Department  
Natural Areas Management Plan  
1650 Mission St, Suite 400  
San Francisco, CA 94103

RE: Scope and Content of Environmental Impact Report and Environmental Review of the  
San Francisco Natural Areas Management Plan.

The San Mateo County Mosquito and Vector Control District would like to ensure that two things are considered in any future environmental documents for the Natural Areas Management Plan

1) The impact of changes at Sharp Park on mosquito development there.

The San Mateo County Mosquito and Vector Control District has been conducting mosquito control at Laguna Salada in the Sharp Park Golf course in Pacifica for several years. Substantial populations of vector mosquitoes develop on this property. Over the past several years, sediment has accumulated in the Laguna and encouraged the growth of cattails. The cattail stands provide ideal habitat for tule mosquitoes. Because of the broad extent of these stands, they must be treated by helicopter, a very expensive operation. If left uncontrolled, mosquitoes from this site present a significant threat to the health and safety of the residents in surrounding neighborhoods and visitors to the golf course and surrounding area. Therefore, the impact of changes to the site on mosquito development there should be one of the issues addressed in environmental documents prepared for the property. Changes to the shape, depth, and vegetation will have immediate and long term consequences on the necessity for pesticide applications, the method by which they are applied, and even the types of materials that must be used at this site. There are ways in which physical changes to the site could greatly alleviate mosquito production and reduce the need for pesticide applications. Conversely, the extent of mosquito development could be increased, if larger areas of marsh become populated with thick vegetation. District staff can offer expertise on the impact of proposed changes on mosquito production at the site. Our staff would like to work with the Planning Department during the design phase to ensure that changes at the Laguna minimize the potential for mosquito development rather than exacerbating the problem.

2) Continued access for inspection and treatment activities.

The SMCMVCD is responsible to the citizens and taxpayers of San Mateo County to provide vector control services. Because mosquito development is currently occurring at this site and may continue, the environmental review should clearly state the need for access to all mosquito development areas for inspection and control operations.

The District would like to work closely with the Planning Department in the future and can provide information on the current state of mosquito development in Sharp Park and the potential impact of any changes to the landscape there.

Thank you,

Chindi Peavey, PhD  
Vector Ecologist  
San Mateo County Mosquito and Vector Control  
(650) 344-8592  
(650) 642-4845

JOB STATUS REPORT

TIME : 05/26/2009 16:06  
NAME : SAN MATEO CO. MVCD  
FAX# : 650-344-3843  
TEL# :  
SER.# : 008100930

DATE, TIME 05/26 16:06  
FAX NO./NAME 14155586378  
DURATION 00:00:00  
PAGE(S) 00  
RESULT BUSY  
MODE STANDARD

BUSY: BUSY/NO RESPONSE



**San Mateo County  
Mosquito and Vector Control District**

1351 Rollins Rd  
Burlingame CA 94010  
(650) 344-8592 Fax (650) 344-3843  
www.smcmad.org

Date: 5/26/09 Time: \_\_\_\_\_

Deliver to: Bill Wycko

Fax Number: (415) ~~558-6378~~ 558-6409

From: Chindi Peavey

Number of pages including coversheet: 3

Subject or Message: Natural Areas Management  
Plan EIR



**San Mateo County  
Mosquito and Vector Control District**

1351 Rollins Rd  
Burlingame CA 94010  
(650) 344-8592 Fax (650) 344-3843  
www.smcmad.org

To: Bill Wycko  
San Francisco Planning Department  
Natural Areas Management Plan  
1650 Mission St, Suite 400  
San Francisco, CA 94103

RE: Scope and Content of Environmental Impact Report and Environmental Review of the San Francisco Natural Areas Management Plan.

The San Mateo County Mosquito and Vector Control District would like to ensure that two things are considered in any future environmental documents for the Natural Areas Management Plan

1) The impact of changes at Sharp Park on mosquito development there.

The San Mateo County Mosquito and Vector Control District has been conducting mosquito control at Laguna Salada in the Sharp Park Golf course in Pacifica for several years. Substantial populations of vector mosquitoes develop on this property. Over the past several years, sediment has accumulated in the Laguna and encouraged the growth of cattails. The cattail stands provide ideal habitat for tule mosquitoes. Because of the broad extent of these stands, they must be treated by helicopter, a very expensive operation. If left uncontrolled, mosquitoes from this site present a significant threat to the health and safety of the residents in surrounding neighborhoods and visitors to the golf course and surrounding area. Therefore, the impact of changes to the site on mosquito development there should be one of the issues addressed in environmental documents prepared for the property. Changes to the shape, depth, and vegetation will have immediate and long term consequences on the necessity for pesticide applications, the method by which they are applied, and even the types of materials that must be used at this site. There are ways in which physical changes to the site could greatly alleviate mosquito production and reduce the need for pesticide applications. Conversely, the extent of mosquito development could be increased, if larger areas of marsh become populated with thick vegetation. District staff can offer expertise on the impact of proposed changes on mosquito production at the site. Our staff would like to work with the Planning Department during the design phase to ensure that changes at the Laguna minimize the potential for mosquito development rather than exacerbating the problem.

2) Continued access for inspection and treatment activities.

The SMCMVCD is responsible to the citizens and taxpayers of San Mateo County to provide vector control services. Because mosquito development is currently occurring at this site and may continue, the environmental review should clearly state the need for access to all mosquito development areas for inspection and control operations.

The District would like to work closely with the Planning Department in the future and can provide information on the current state of mosquito development in Sharp Park and the potential impact of any changes to the landscape there.

Thank you,

Chindi Peavey, PhD  
Vector Ecologist  
San Mateo County Mosquito and Vector Control  
(650) 344-8592  
(650) 642-4845



*The San Francisco Tree Council*

May 23, 2009

Bill Wycko, Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103-2479

**RECEIVED**

MAY 27 2009

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
M.E.A.

**Re: Initial Study of the Natural Areas Management Plan**

Dear Mr. Wycko,

Please require a full **Environmental Impact Report of the Natural Areas Management Plan**. As director and founder of the SF Tree Council and an appointed founding member of the city's Urban Forest Council, and after attending 5 years of Natural Areas meetings -- I am greatly concerned about the past 10 years of the Natural Areas Program destroying healthy mature trees, and ignoring the tremendous loss and outrage of the majority of San Franciscans.

San Francisco's large, mature trees are truly an endangered species and need to be preserved. Only 5% of trees of the total 669,000 trees in San Francisco have diameters greater than 30 inches, according USDA 2007 report (UFORE) on the state of the urban forest in San Francisco.

I concur with Mary McAllister, Karin Hu, and Nancy Wuerfel's assessment of The Initial Study of the SNRAMP. It is flawed, incomplete, and does not provide the much needed proof that SNRAMP is sustainable, cost effective or will benefit the greater good of our citizens. The scientific communities in the United State question the value of native plants and its citizens have rejected it when requiring the removal of healthy trees.

The Initial Study of the environmental impacts of SNRAMP is inadequate in many respects:

- It dismisses as "insignificant" environmental impacts that have been experienced in the past and that caused considerable damage as well as public concern.
- It makes sweeping statements, dismissing environmental and safety issues without providing any basis for these dismissals
- It demonstrates that the author has either not read SNRAMP or has not understood important portions of it
- It demonstrates that the author has ignored basic scientific principles needed to analyze potential impacts, such as carbon sequestration and release
- It demonstrates that the author has not visited the natural areas and is unaware of the 10-year history of environmental and safety problems and public concern since the Natural Areas Program began

For the long-term health of our environment and that of the citizens of San Francisco, please require a full EIR of SNRAMP.

Sincerely yours,

*Carolyn Blair*, Executive Director  
San Francisco Tree Council  
Member SF Urban Forest Council  
2310 Powell Street, Suite 305  
San Francisco, CA 94133  
[sftreecouncil@dslextreme.com](mailto:sftreecouncil@dslextreme.com)  
415-982-8793

*Working Together To Preserve & Protect Our Community Urban Forest,  
For Nourishment for the Soul, Consolation for the Heart  
And Inspiration for the Mind*

Brent Plater  
<bplater@ggnrabitg  
year.org> To  
<jessica.range@sfgov.org>,  
06/16/2009 01:38 <bill.wycko@sfgov.org>  
PM cc

Subject  
Re: Scoping Comments on NAP EIR

Hi Jessica,

Thanks for talking to me about the Natural Areas Program/Laguna Salada Enhancement CEQA process last month. As I mentioned to you on the phone, the main purpose of the Laguna Salada Enhancement Plan is to “restore the Laguna Salada wetlands to provide suitable habitat for the San Francisco garter snake and the California red-legged frog.” p. 1-1. To do so, the purposes and objectives section expressly states that San Francisco and/or its consultants must consider restoring vegetative conditions, water quality, migration corridors, etc. in “the lagoon and the surrounding area.” Id. Thus, it seems that RPD must consider full restoration of Sharp Park through the CEQA process, and that the City may not simply presume that the golf course will continue to exist indefinitely.

I also previously sent you a copy of my comments, along with a website where you could download the comments and all the exhibits. Please let me know if you have any trouble accessing the documents. The link is posted again below.

Thank you,

Brent Plater  
415-572-6989



RECEIVED

JUN 24 2009

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
M E A

220 MONTGOMERY ST., #303  
SAN FRANCISCO, CA. 94104  
(415) 392-5431, ext. 203  
E-MAIL: RICHARD@ERSKINETULLY.COM

June 22, 2009

By U.S. mail and e-mail

Mr. Phil Ginsburg, Director  
Ms. Dawn Kamalanathan, Planning Director  
Recreation & Parks Department  
City of San Francisco  
McLaren Lodge  
501 Stanyan St.  
San Francisco, CA. 94117

San Francisco Planning Department  
Attn: Bill Wycko, Environmental Review Officer  
1650 Mission St., #400  
San Francisco, CA. 94103-2479

Re: Sharp Park Golf Course

Alternate Use Study  
Park Code, Article 3, Section 320  
File No. 090329

Sensitive Natural Resource Areas Management Plan EIR  
Case No. 2005.1912E

Dear Mr. Ginsburg, Ms. Kamalanathan, and Mr. Wycko,

In connection with your respective planning processes with regard to the Sharp Park Golf Course, the San Francisco Public Golf Alliance submits the following comments and suggestions.

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Ms. Dawn Kamalanathan  
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(1) Sharp Park Golf Course is an historic public landscape of local, national and international significance, one of the few public golf courses, and the only surviving seaside public links, designed by the historically preeminent golf architect Alister MacKenzie.

(2) The golf course is culturally significant as a popular recreational asset used and enjoyed by men, women, and children of all ages, backgrounds, races, and cultures.

(3) The golf course is also a work landscape architecture of the highest aesthetic value, by an internationally-renowned master, and is enjoyed not only by the golfers, but also by the thousands of strollers, hikers, and bikers who pass by on the seawall that overlooks the golf course.

(4) Practical, cost-effective measures are readily available to preserve the full 18-hole golf course, in its current configuration, retaining all of MacKenzie's remaining original golf holes, while simultaneously protecting and enhancing the habitat for the red-legged frog and San Francisco garter snake at the ponds and waterways on the golf course.

(5) Simultaneously preserving the golf course and protecting the frog and snake can be accomplished more quickly, and at lower cost to the city in both money and administrative time, than eliminating the golf course or reducing it to 9 holes.

(6) Because of the golf course's international status as a public seaside Alister MacKenzie course, preservation of the golf course offers the city the opportunity for significantly greater revenue, than destruction or diminution of the golf course.

#### **I. HISTORICAL, AESTHETIC, AND CULTURAL SIGNIFICANCE OF SHARP PARK GOLF COURSE.**

1. Sharp Park Golf Course, opened in 1932, is the work of the internationally preeminent golf architect, Dr. Alister MacKenzie, who was hired for the job by John McLaren, a kindred Scottish gardener and the father of Golden Gate Park. McLaren was head of the San Francisco Recreation and Park Department, and personally planted the trees on the golf course.

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2. Sharp Park Golf Course is a nationally and internationally-significant cultural landscape, and has been formally recognized as worthy of preservation by public entities and non-governmental organizations, including the City of Pacifica, County of San Mateo, and the Cultural Landscape Foundation of Washington, D.C.

3. Golf architecture is a branch of landscape architecture, and MacKenzie was a naturalist, in the tradition of Capability Brown, the 18<sup>th</sup> Century father of the English school of landscape design, which turned away from the formal geometry of French and Italian gardens. "The chief object of every golf course architect worth his salt," MacKenzie famously said, "is to imitate the beauties of nature so closely as to make his work indistinguishable from nature itself."

4. The great aesthetic value of MacKenzie's landscape architecture is enjoyed not only by golfers, but by the thousands of walkers and hikers who pass by daily on the trail atop the seawall that adjoins the golf course to the west.

5. MacKenzie was a native Englishman and Bay Area resident, and the designer of several of the world's best-known and most beloved golf courses, including Cypress Point and Augusta National, the site of the annual Master's Tournament. Sharp Park is one of only a very few public courses designed by MacKenzie, and his only remaining public seaside links. As such, Sharp Park is a world cultural resource, the only place in the world where current and future generations of the general public can experience in person the seaside work of this master artist.

6. As Sharp Park's owner, San Francisco has an obligation of stewardship, which accompanies international masterworks.

7. In its current condition and configuration, the Sharp Park Golf Course has 12 of MacKenzie's original holes, complete with their greens complexes (numbers 1, 2, 3, 9, 10, 11, 13, 14, 15, 17, and 18), parts of two other holes (numbers 12 and 16), and another original green complex at the 8<sup>th</sup> hole. Although four ocean side holes were lost to the sea years ago, and other holes have lost original bunkers and consequently some of their original strategy (which could be restored), and

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although the seawall now blocks ocean views, the course retains its seaside links character and the air, wind, sounds, and smells of the sea.

8. Sharp Park Golf Course also retains the artistry and ingenuity of Dr. MacKenzie's original design. Sharp Park's picturesque routing, the architect's trademark optical illusions, and his false-fronted, heaving and tumbling greens simultaneously entertain and challenge golfers as they walk the linksland. For example, MacKenzie's famous use of camouflage is displayed at the current 14th hole, where a large mound 30 yards in front of the right side of green creates an optical illusion that the green is closer to the player standing in the fairway than it is in fact.

9. "A golf course should be made interesting and a good test of golf," MacKenzie said, "by the tilt of the greens and the character of the undulations." (*The Spirit of St. Andrews*, 1934, at p. 75.) MacKenzie designed dramatic mounds in Sharp Park's greens and surrounds to deflect all but the very best shots away from the holes. He built "false fronts" at the greens on holes 2, 9, 13, 14, 17, and 18, to reject shots that land on the front of the greens. Likewise, MacKenzie used steep slopes off the sides of greens (for example, at the 17<sup>th</sup> green), to deflect the inexpertly-struck approach shot down an embankment to a very difficult short-side pitch.

10. Because the master's artistry can be seen and directly experienced by the public, Sharp Park has great value to the local, regional, national, and international golf communities, all of which look to San Francisco to act as a responsible caretaker of this internationally-known and beloved asset.

11. This unpretentious, old-fashioned, golf course provides golf at modest cost to the general public, and as a result the course closely resembles in spirit the seaside links of the sport's homeland, Scotland. In 2006-2007 and 2007-2008, the most recent years for which official figures are available, 56,000 and 51,000 annual rounds of golf were played at Sharp Park, according to the December 17, 2008 Report of Controller Ben Rosenfield to the San Francisco Board of Supervisors.

12. The City of San Francisco's recreational consultant Leon Younger and PROS Consulting, in its August, 2008

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Recreational Opportunities Study Summary Report, urged the city to preserve the golf course: "A historic golf course designed by the most celebrated golf architect.... It is much like having a park designed by Olmstead or a Frank Lloyd Wright building.... The golf community around the world is aware of this golf course, its past and future potential... to be one of the best public golf courses in the United States.... Because of its heritage it has the potential for private fund raising or an endowment for restoration and remodel. Probably one of the few in America.... It provides the average golfer access to design greatness.... It should be a crown jewel of the Recreation and Park Department and the city of San Francisco, a prominent fixture extolling the quality of life in this area. A proud heritage of some of the best golf in the world and its relationship to the sea.... It would also become a great revenue source (especially with private funds for restoration/remodel) for the Recreation and Park Department, as it would be a great local golf course but also a destination golf course for golfers all over America." (PROS Report, August, 2008, at p. 44.)

13. Destruction of the Sharp Park Golf Course, or its disfigurement or diminution to 9 holes, as some have suggested, would be a great loss to San Francisco, and would be fatal to the international significance and appeal of the course. The world golf and landscape architectural communities would mourn and recriminate, and would regard the city as irresponsible and folly.

14. For these reasons, San Francisco should make every effort to maintain all of the remaining MacKenzie golf holes at Sharp Park.

## **II. THE GOLF COURSE CAN BE RETAINED AND PRESERVED, WHILE SIMULTANEOUSLY ENHANCING THE ENVIRONMENT.**

1. We recognize that the Sharp Park Golf Course has over the years--and precisely because the golf course has fostered a freshwater pond ecology in place of the brackish water ecology that preexisted the golf course and the seawall--become home to the federally-protected red-legged frog and the endangered San Francisco garter snake, and that the city is under state and federal mandate to protect these species.

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2. Golf courses can be, and commonly are, operated in a manner that protects and enhances habitat for threatened and endangered species. In fact, this is done right now at the San Francisco Public Utilities Commission-owned Crystal Springs Golf Course, located on public watershed lands in Hillsborough. The golf course is leased by the city long-term to an environmental award-winning golf management company that specializes in operating municipally-owned courses. Since the lease began about 15 years ago, Crystal Springs has simultaneously provided public golf, enhanced habitat for native species including the red-legged frog and San Francisco garter snake, annually returned over \$1 Million in net lease payments to the city, while also making nearly \$5 Million in capital improvements to the property.

3. We understand from the description of the "Recommended Management Actions" at pages 43-44 of the Tetra-Tech Natural Areas Management Plan Initial Study, that the city intends to dredge Laguna Salada, and to remove some amount of the bulrushes that now fill that marsh, to create ponds of open water together with upland habitat islands. However, we have not seen any details of this dredging and tule-removal plan. How deep will the ponds be after dredging, and what will be their new dimensions and water-holding capacities? Will permits be required for such dredging and/or tule-removal operations? As between the City and County of San Francisco, the City of Pacifica, County of San Mateo, the Coastal Zone Commission, and the Corps of Engineers, where does the permitting authority for this work lie?

4. We also understand that the city's "Recommended Management Actions" include the creation of "a buffer zone between the Laguna Salada wetlands and the golf course fairways." We are unaware of any description of this buffer zone, or its dimensions or mechanics. And we have the same questions as to permit requirements and permitting authority, as described above at the end of paragraph II.3.

5. We have several questions about the drainage from Horse Stable Pond to the beach: (1) what is the water level of the outflow pipe(s); (2) what is the capacity of the pump(s); (3) what is the working condition of the pump(s); (4) what is the water level and the capacity of the gravity outflow line; and (5) what is the operational status of the gravity outflow line? We need a better understanding of how the gravity and the pump-

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assisted outflows work together, and the reasons why there have in the past been problems. We understand that the gravity outflow pipe had been clogged for many years, but that it has recently been unclogged. When was that accomplished, and who was the project officer, and what is the contact information for that project officer? Who has the best understanding of these pond hydrology issues, and has there been a comprehensive written report on these issues? Can we get a copy of such a report? We need full understanding of these issues to address the fairway drainage issues discussed below in paragraph II.7(8).

6. We also understand the Golden Gate National Recreation Area's Mori Point property, immediately to the south of Horse Stable Pond, to be upland habitat for the San Francisco Garter Snake and the red-legged frog, and that the GGNRA has encouraged the city to manage Sharp Park compatibly with the species' migration between Mori Point Mori Point, Horse Stable Pond, and Laguna Salada.

7. Subject to our need for additional site information, we suggest a combination of measures, including but not limited to the following, at what appear to be the most environmentally-sensitive areas on the course--holes Nos. 12, 13, 14, and 15.

(1) create a native plant/no-golf area surrounding an "island" green complex in the vicinity of the current 12<sup>th</sup> green;

(2) alternately, relocate the 12<sup>th</sup> green complex (which is not a MacKenzie original) to the west, closer to the seawall;

(3) alternately relocate both the tee and green complex for the 12<sup>th</sup> hole to west and north of 12<sup>th</sup> green and 13<sup>th</sup> tee, which appears to be the site of an abandoned golf hole, currently overgrown with iceplant;

(4) create an "island tee" complex at the 13<sup>th</sup> tee, also surrounded by a native plant/no-golf area;

(5) connect the 12<sup>th</sup> tee and green, the 12<sup>th</sup> green and 13<sup>th</sup> tee, and the 13<sup>th</sup> tee and 13<sup>th</sup> fairway by raised boardwalk causeways, which would be the only access to these playing areas, and reduce golf maintenance at the 12<sup>th</sup> green and 13<sup>th</sup> tee complexes to hand-mowing;

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(6) make these raised causeways at the 12<sup>th</sup> and 13<sup>th</sup> holes walking-only for both golfers and maintenance workers, and require golfers to park golf carts behind the 11<sup>th</sup> green, and retrieve them only after returning to the 13<sup>th</sup> fairway;

(7) restrict golf cart usage on the 13<sup>th</sup>, 14<sup>th</sup>, 15<sup>th</sup>, and 17<sup>th</sup> fairways to cart paths only, and move the cart paths away from Laguna Salada;

(8) raise the 14<sup>th</sup> fairway at its lowest points, and separate the fairway from the wetland area by some combination of mounds and/or low railroad-tie walls, and then follow the drainage overflow around the Laguna Salada, and contain the overflow with similar mounds and/or low walls;

(9) alternately, at times of high water at the 14<sup>th</sup> fairway, temporarily close that fairway to play, and utilize instead a new short 4-par hole that might be located running south to north alongside the seawall, behind the current 12<sup>th</sup> green and 13<sup>th</sup> tee; and

(10) connect the 15<sup>th</sup> tee and green complex with another causeway.

Similar measures to the foregoing have been taken at other courses with sensitive amphibian species, in the Bay Area and elsewhere, including at Bodega Bay and Crystal Springs.

8. The foregoing and similar measures could be accomplished consistent with and as part of the currently-ongoing Sensitive Natural Resource Areas Environmental Impact Report process. By comparison, we believe that destruction of the golf course, or significant reconfiguration with new holes in virgin areas, or reduction of the golf course from 18 to 9 holes, would require a separate, lengthy and expensive environmental review process, that would raise many complex and controversial environmental and social issues outside the scope of the current EIR process.

9. We have reviewed the Recreation and Park Department's recently-adopted Environmental Species Compliance Plan for Sharp Park. Employed in conjunction with the Recommended Management Actions listed for the Laguna Salada and Horse Stable Pond area in the Tetra Tech Initial Study, the

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measures outlined in the Compliance Plan provide for continuation of the MacKenzie golf course, in harmony with protection of the frog and snake and enhancement of their habitat.

10. We understand that the city's contract for the Harding Park project requires the Professional Golfers Association ("PGA") to provide golf design at Sharp Park and/or Lincoln Park up to \$1 Million. (See Management Audit of Recreation and Park Department, by San Francisco Budget Analyst's Office, January 12, 2006, at Section 6.) The sensitive ecology and hydrology issues at Sharp Park necessarily imply environmental and engineering study as part of golf course design, so that now would be a good time for the city to invoke the PGA's obligation to provide design at Sharp Park.

We anticipate consulting with a team including a species biologist, hydrologist, and golf architect, and we further anticipate that we may have additional or alternative suggestions aimed at finding creative, minimalist, nature-friendly solutions that will simultaneously preserve and enhance the habitats for the listed species, and preserve the legacy MacKenzie golf course at Sharp Park. And we look forward to working cooperatively with the Recreation and Park Department, Fish and Game, the Fish and Wildlife Service, and the relevant political entities and administrative agencies to this end.

We ask you to advise us as soon as possible of the details of the city's dredging plans at Laguna Salada, Horse Stable Pond, and the connecting waterway and Sanchez Creek. These plans will affect the hydrological issues of the above-discussed drainage measures. We also ask that, as soon as possible, we be allowed to meet with the city's biologist and golf architect so that we can fully understand their scientific and topographic concerns at the site.

If working cooperatively we can simultaneously save the golf course and protect the frog and snake and enhance their habitat--and we are confident this can be done--then San Francisco will have an asset that will be valuable to the environment, to the citizens of San Francisco and its neighboring communities, to the local and international golf and cultural landscape communities, and to the treasury of the Recreation and Park Department. Such an environmentally-friendly golf course

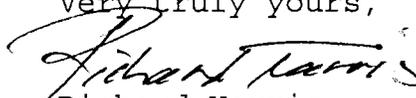
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will be a revenue-generator for the city, and an example to other communities with sensitive species issues in their parklands.

Because we would be preserving an asset of the broader golf community, we are endeavoring to obtain the support, financial and otherwise, of that community to make this possible. Initial responses to our inquiries in this regard have been very positive, on the assumption that the interrelated environmental and golf restorations, and golf at Sharp Park going forward, will require the very highest levels of biological science, engineering, stewardship, and golf operations.

We look forward to working closely with you and all of the interested political bodies and administrative agencies, and all persons of good will, on this important project.

Very truly yours,



Richard Harris  
San Francisco Public Golf Alliance

cc: Mayor Gavin Newsom  
Mayor Julie Lancelle  
Supervisor Sean Elsbernd  
Supervisor Ross Mirkarimi  
Golden Gate National Recreation Area  
George Mozingo  
Ken King  
Lennie Roberts  
Cultural Landscape Foundation  
Tim Finchem, Commissioner, PGA of America  
David Diller, President, Sharp Park Golf Club  
Lyn Nelson, CEO, Northern California Golf Association  
San Francisco Parks Trust  
Alister MacKenzie Society  
American Society of Golf Course Architects  
Sean Sweeney  
John Bock, Tetra-Tech, Inc.  
Laborers Union Local 261  
San Francisco Golf Task Force Members  
Directors, San Francisco Public Golf Alliance