

APPENDIX

J

## **Summary of Changes to the SNRAMP**



Edwin M. Lee, Mayor  
Philip A. Ginsburg, General Manager

August 24, 2011

Bill Wycko, Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

Re: Clarification of Changes to the SNRAMP Project Description

Dear Mr. Wycko,

The San Francisco Recreation and Parks Department (SFRPD) published the Draft Significant Natural Resource Area Management Plan (SNRAMP) for environmental review and the following describes the modifications made to the Plan for one or more of the following reasons:

- The activity was determined to be infeasible
- The activity has been completed under separate environmental review
- The activity was incorrectly described
- The activity has been reassessed as contrary to policy
- Additional details and specificity have been developed for the activity

1. Prescribed Burning. While General Recommendation GR-3b of the February 2006 Final Draft San Francisco Natural Areas Management Plan (SNRAMP) mentions prescribed burning, no burning is proposed as part of the project. The following text has been added to the project description (Section III.H of the EIR):

*(Note: The SNRAMP no longer is proposing prescribed burning. 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.)*

2. Dog Play Areas. While General Recommendation GR-8b of the SNRAMP mentions consideration of new dog play areas, no new dog play areas are proposed as part of the project. The following text has been added to the project description (Section III.H of the EIR):

*(Note: An underlying assumption of this EIR is that there would be no new DPAs because there is direction from the Recreation and Park Commission not to establish new DPAs until systemwide DPA planning is completed. For the purposes of this EIR, this is considered a moratorium in that no new DPAs are reasonably foreseeable. This direction 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.)*



3. Bayview Park Key Avenue Modifications. While Recommendation VP-8a of the SNRAMP mentions modifying the Key Avenue roadway, some of those modifications have been completed and are not proposed as part of the project. The following text has been added to the project description (Section III.F.2 of the EIR):

*(note that portions of this management action have been completed)*

4. Lake Merced Dog Play Area. While Recommendation LM-7a of the SNRAMP mentions relocating a dog play area, no relocation of dog play areas is proposed as part of the project, in compliance with the current moratorium on dog play areas. The following text has been added to the project description (Section III.I.18 of the EIR):

*(Note: The SFRPD determined following completion of the final draft SNRAMP that, due to ongoing disturbance of breeding birds, this DPA should be closed, rather than monitored. This DPA would be closed in accordance with the SFRPD Final Dog Policy (SFRPD 2002) and SFPUC's Lake Merced Watershed Report (SFPUC 2011). Due to the San Francisco 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.)*

5. Lake Merced Environmental Education Center. While Recommendation LM-8b of the SNRAMP mentions development of an environmental education center, no such center is proposed as part of the project. The following text has been added to the project description (Section III.I.18 of the EIR):

*(Note: Constructing and operating an environmental education center is no longer proposed as part of the SNRAMP. The SNRAMP will be updated to reflect this change. 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.)*

6. Former Sharp Park Rifle Range. While Recommendation SP-12a of the SNRAMP mentions cleanup and remediation of the former rifle range, those activities are not proposed as part of the project. Remediation of the rifle range is complete, and the CEQA lead agency for this project is the California Department of Toxic Substances Control. The following text has been added to the project description (Section III.I.23 of the EIR):

*(Note: Because these cleanup and remediation activities are part of a separate process led by the SFRPD Capital Division, are complete, and have been evaluated under a separate CEQA review, they are not addressed as part of the SNRAMP in this EIR.)*

7. Additional Management Details. To provide additional details for analysis of the potential environmental effects, the following text has been added to the project description regarding best management practices, program-level activities, and routine maintenance activities:

*(Section III.E.5 of the EIR)*

*Depending on site conditions, trails may or may not be created in previously inaccessible areas, as opposed to improving existing social trails. Trail placement would be designed to avoid sensitive vegetation and habitat to the extent possible. Trail alignments in the SNRAMP are conceptual and require further refinement and site-by-site evaluation to confirm the best alignment to provide access and minimize effects on surrounding natural resources.*

*The Natural Areas Program gardeners would continue to carry fire extinguishers in their trucks and would use appropriate fire prevention and suppression measures for more extensive tree and shrub 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.*

*Tree Removal and Replacement. Invasive trees removed in San Francisco would be replaced with native tree species at a ratio of roughly one-to-one, although not necessarily at the same location or within the same Natural Area. The SFRPD would take into consideration the views from Natural Areas when locations are being selected for new trees; locations of replacement trees in San Francisco Natural Areas would be selected to preserve views from important points. Tree removal and other activities conducted at the edges of Natural Areas may require temporary closure of sidewalks and roads. For Sharp Park in Pacifica, many of the trees would be replaced not with trees but with more appropriate native vegetation, specifically coastal scrub. 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 could remove trees that have a diameter at breast height (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, surveys would be conducted before tree removal to determine the presence or absence of breeding birds, in accordance with GR-4b. Typically, trees would be removed limb-by-limb, rather than felling an entire tree; limb-by-limb removal techniques would always be applied in areas adjacent to other trees or sensitive habitat unless this technique is not feasible or practical from a safety perspective. Minimally impacting tree removal techniques would be employed and would involve removing the individual limbs of a tree, then cutting the trunk into individual sections. Tree removal would be conducted manually by someone climbing the tree or someone on a mechanical cherry picker next to the tree. If tree removal occurs in an area that is roadway-accessible, the limbs and trunk sections typically would be transported from the area by a flatbed truck; in other areas, the limbs and trunk sections would be left in place on the ground. Tree removal would leave the tree stump and root ball intact to hold the soil and minimize subsurface disturbance; stumps may be ground to below grade where necessary to avoid tripping hazards. The SFRPD would spread tree removal across targeted portions of Natural Areas and would not concentrate it in a particular location. Larger-scale tree removal (that exceeds half an acre or on average more than 20 trees), identified and analyzed as long-term programmatic projects in this EIR, would remove trees within urban forests (MA-2 and MA-3) over time and not simultaneously in one portion of a Natural Area. The SFRPD's Tree Removal Procedures require that all trees 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 thinning both individual trees and small clusters of trees. In most cases, some trees within the area would be left, and the surrounding forest would remain intact. Removal of other vegetation in MA-1 areas would primarily affect individual plants within roughly half-acre plots.*

(Section III.F.1 of the EIR)

*Programmatic projects would include the following:*

- *Rerouting or constructing trails, using heavy equipment (such as bobcats, backhoes, and excavators) at an average or maximum grading depth of two feet. This activity is typically conducted by contractors.*
- *Stabilizing hillsides, using erosion control measures that require heavy equipment and grading and possible installation of structures, such as gabions. This activity is typically conducted by contractors.*
- *Undertaking initial invasive weed or tree removal projects that typically exceed half an acre (or on average 20 trees) at any one time. Trees will be removed manually and limb-by-limb, as described previously. This activity can be conducted by contractors or SFRPD staff.*

*While the SNRAMP may identify additional types of programmatic projects, the environmental effects of those projects are anticipated to be similar to or less than the above categories of program-level projects.*

(Section III.F.2 of the EIR)

**Routine Maintenance**

*Routine maintenance would include the following:*

- *Removing invasive weeds by hand, either as follow-up on a previously treated site or as initial treatment in small areas (less than half an acre). This activity mostly involves the use of hand tools and volunteers, with some use of power equipment by SFRPD staff, such as brush blades or chainsaws. Ground disturbance from this activity is typically within the top inch or so of ground around the root zone.*
- *Installing plants using hand tools and plants in one-gallon containers or smaller. In addition to planting, volunteers also may assist Natural Areas Program staff with installation of erosion control materials, including coir rolls, straw bales, wattles, jute netting, and straw matting. These materials are installed with pins or two- to three-foot-long wooden stakes. This activity typically disturbs up to 12 inches of surface soil.*
- *Removing invasive trees (mostly eucalyptus), as well as overhanging tree limbs. This activity typically occurs in places where trees are expanding into or threatening a native habitat or presenting a safety concern. Following removal, stumps are left in place, resulting in little, if any, ground disturbance. Typically, no more than 20 trees (or half an acre) are treated at one time. This removal covers saplings and any tree over 15 feet high. Trees over six inches dbh are typically removed by tree crews at a rate of one to a few trees at a time. Trees will be removed manually and limb-by-limb, as described above.*

- *Maintaining trails, which includes clearing deposited soil from steps, replacing or installing steps or trail edging, and rerouting and benching trails. Ground disturbance for this activity is usually six inches or less.*
- *Maintaining catchment basins and sediment dams through hand removal of accumulated materials.*

(Section III.G of the EIR)

*When the San Francisco Recreation and Park Commission approved the SNRAMP for environmental analysis under CEQA, it passed the following two amendments:*

- *MA-3 areas would be maintained by the SFRPD Urban Forestry staff and may be reforested with native or nonnative species. Weed and brush removal and erosion control in MA-3 areas would be undertaken in accordance with the SNRAMP.*
- *Where appropriate in the SNRAMP, feral cat relocation would be implemented only on a determination by the San Francisco Recreation and Park Commission that other methods of population reduction failed to adequately reduce cat populations in the Natural Areas.*

8. General Recommendation GR-4b. The bird breeding season was changed from April to September 1 to February 1 to August 31. (Section III.H of the EIR)

9. General Recommendation GR-15c. The following language was added to the end of the description: "retain snags and dead branches on live trees, unless they are a hazard to public safety or contain significant harmful insect or disease infestations." (Section III.H of the EIR)

10. Recommended management action VP-7b. The following text was added: "(note that this new entryway may not be feasible given the steepness of the slopes)." (Section III.I.2 of the EIR)

11. Recommended management action CH-1e. The following text was added: "(note that a portion of these trees on the north side of Corona Heights were removed in August 2010 because they were determined to be hazardous)." (Section III.I.7 of the EIR)

12. Recommended management action DP-1b. The number of existing eucalyptus trees was changed from 120 to 100. (Section III.I.8 of the EIR)

13. Recommended management action DP-2a. The text was changed so that tree removal is prohibited within 150 feet of an occupied bird nest, rather than within 500 feet. (Section III.I.8 of the EIR)

14. Recommended management action GC/OH-4a. The text was changed so that tree removal is prohibited within 150 feet of an occupied bird nest, rather than within 500 feet. (Section III.I.12 of the EIR)

15. Recommended management action IG-2a. The following text was added: "(note that this work is underway and is expected to be completed in June 2011)." (Section III.F.16 of the EIR)

16. Recommended management action LM-3a. The text was changed so that tree removal is prohibited within 150 feet of an occupied bird nest, rather than within 500 feet. (Section III.I.18 of the EIR)

17. Recommended management action LM-3b. Heron nesting areas were added to the list of areas that could require closure of social trails to reduce disturbance of such areas. (Section III.I.18 of the EIR)

18. Sharp Park. The bulleted text under SP-4a was modified and deleted. The bulleted text under SP-4b was modified to match current restoration design. Under SP-4c, language was added indicating that the goal is to ensure that red-legged frog egg masses remain hydrated. Recommended actions SP-4e, SP-6a, SP-6b, and SP-9ca were deleted and the remaining measures were re-labeled. SP-10a was modified to specify that the subject trenches are located north of Sharp Park Road. The following detailed description of the Laguna Salada wetland complex restoration activities was added, as presented below (Section III.F.2 of the EIR):

#### **Sharp Park Restoration**

*As part of the Sharp Park restoration activities, the following measures from the SNRAMP would be implemented. The full set of Sharp Park SNRAMP measures are presented in Section III.I.23 and include additional measures that may fall under either programmatic projects or routine maintenance.*

- *SP-4a—Implement improvements to protect and enhance the habitat for the California red-legged frog and San Francisco garter snake at Laguna Salada, including the following:*
  - *Create upland mounds for foraging, resting, and escape cover for the California red-legged frog and the San Francisco garter snake;*
  - *Dredge excess sediments and accumulated organic matter, including stands of invasive tules, to maintain open water and fringe habitat in the wetlands complex and use appropriate dredged material on site to create or enhance upland habitat or to increase the elevation of certain golf course fairways;*
  - *Continue monitoring for California red-legged frogs and San Francisco garter snakes; and*
  - *Install and maintain signs and barriers to prevent disturbance of sensitive habitat in Horse Stable Pond and Laguna Salada by dogs or other possible nuisances.*
- *SP-4b—Construct upland mounds in the area directly south and southeast of Laguna Salada and plant with native grasses and herbs to provide snake and frog basking sites, and to provide nesting habitat for riparian birds; and*
- *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.*

*The improvements to protect and enhance the California red-legged frog and San Francisco garter snake at Laguna Salada under measure SP-4a are focused on restoring the marsh complex and associated uplands. These restoration activities are intended to establish conditions that more resemble previous conditions and allow for thriving populations of these listed species. Figure 2 shows the restoration project footprint and the current vegetation communities, and Figure 3 shows the conceptual plan for restoring these areas. The goals of the Sharp Park restoration are to restore or enhance the wetland and upland habitat for the benefit of the San*

*Francisco garter snake and California red-legged frog, which will contribute to the recovery of these species, and to reduce the potential recurrence of the conditions that negatively affect the wetland complex and habitat for these species, including sedimentation, eutrophication due to the accumulation of dead and decaying vegetation, and loss of open water habitat due to accumulation of sediment and the proliferation of invasive plant species. Although the primary restoration features discussed in this section are not likely to change, some modification may occur during consultation with the USFWS and/or CDFG pursuant to the state and federal Endangered Species Acts and during other regulatory approval processes. The main components of the restoration to achieve recovery of the California red-legged frog and San Francisco garter snake populations are as follows:*

- Dredging up to 60,000 cubic yards of material to remove sediment, encroaching plant species, and decaying vegetation in Laguna Salada, Horse Stable Pond, and the channel that connects the two water bodies, resulting in the conversion of freshwater marsh, willow scrub, and wet meadow wetland habitat to open water habitat;*
- Recontouring freshwater marsh wetland and ruderal (disturbed) habitat along the Laguna Salada, Horse Stable Pond, and channel shorelines to create shallow water wetland habitat;*
- Creating an upland and wetland habitat corridor between Horse Stable Pond and Laguna Salada;*
- Converting about half an acre of wet meadow/freshwater marsh wetland to upland habitat, creating an upland refuge in the middle of Laguna Salada to provide snakes and frogs with refugia from feral cats and other terrestrial predators, and creating about an acre of replacement wetland along the northern and western edges of the lagoon in place of coastal scrub habitat; and*
- Constructing up to four acres of upland mounds on landscaped grass on the east side of the lagoon and between Laguna Salada and Horse Stable Pond. These mounds would be placed in the area currently occupied by part of the Hole 13 fairway, which would be narrowed and reconfigured.*

*Some areas that are currently open water within Laguna Salada and Horse Stable Pond would be deepened by one to three feet, and parts of the eastern portions of the lagoon and pond shorelines, as well as the connector channel, would be excavated to restore open water habitat and to ensure that ample edge habitat consisting of open water/emergent vegetation interface would persist for the foreseeable future. This deepening would be conducted using excavating equipment positioned along the shore of the two water bodies. Up to 60,000 cubic yards of material would be excavated; of this, approximately 40,000 cubic yards would be used on-site and approximately 20,000 cubic yards would be stockpiled or spread at the Sharp Park rifle range site or disposed of at the Sharp Park organic dump. Excavated dredge spoils appropriate for use as golf course substrate materials would be used on-site to raise the elevation of Holes 10, 14, 15, and 18 and to create the upland habitat on the east edge of Laguna Salada. Prior to on-site use of dredged material, the sediments to be removed as part of the wetland restoration*



*project would be tested for elevated concentrations of sulfides and other characteristics to determine whether the sediments would serve as soils suitable for supporting desired vegetation. If the sediment proves unsuitable, it would be placed in a nonsensitive location or treated to render it capable of supporting the desired vegetation. Treatment may include spreading and mixing the dredged material with native soil to avoid concentrating acidic soils or adding lime to neutralize acidic soils. Excavation of the eastern portions of the lagoon, pond and the connector shoreline would convert up to six acres of freshwater marsh, willow scrub, and wet meadow wetland habitat to open water habitat.*

*To facilitate deepening of Laguna Salada, Horse Stable Pond, and the channel that connects them, as well as removal of encroaching bulrushes and tules, the water levels would be lowered temporarily to allow equipment to access the shoreline for removal of accumulated vegetation and sediments. This would be accomplished by operating the pumps at Horse Stable Pond to draw water through the wetland complex and out to the Pacific Ocean. It is anticipated that the water level in the wetland complex would be lowered from an approximate elevation of 7.5 feet above mean sea level (msl) to an elevation of approximately 4.5 feet msl, a decrease of 3 feet. Following lowering of the water levels, a qualified USFWS-approved biologist would survey the entire project area for California red-legged frogs and San Francisco garter snakes. If individuals are found during the survey, the biologist would relocate them to appropriate aquatic habitat, such as that near Mori Point, located south of Horse Stable Pond (or other suitable location as agreed to as part of consultation with the USFWS and/or CDFG); these activities would be conducted in coordination with the USFWS and CDFG.*

*An upland and wetland habitat corridor between the lagoon and the pond would be constructed with upland features designed to support the San Francisco garter snake; this action would necessitate permanently closing Hole 12 of the Sharp Park Golf Course. Sediment basins would be installed in two locations, one where Sanchez Creek enters a culvert to pass under Highway 1 and the other at the northern boundary of Sharp Park; the former sediment basin would be developed on about half an acre of the golf course (primarily upland Monterey pine habitat), and the latter sediment basin would be expanded onto about half an acre of ruderal and upland Monterey pine habitat. A post and rail fence would also be installed along the seawall to the west of the lagoon, with additional fencing around the wetland complex, to discourage human and pet intrusion into the restored habitat area.*

*Creating an upland refuge in the middle of the lagoon would require filling approximately half an acre of wet meadow and freshwater marsh wetlands. To compensate for this and other incidental loss of vegetated wetlands during construction, in-kind creation of approximately one acre of wetlands would occur in several upland locations around the northern and western edges of the lagoon. The newly created wetlands would cover the same or a greater amount of area as the wetlands that would be converted to upland habitat.*

*During the restoration activities, temporary equipment staging and materials storage would occur at the northwest corner of Sharp Park, at or near Hole 17 of the golf course. Equipment access to the project area from the north would be from Clarendon Street, which runs along the north side of Sharp Park. Access to the southern part of the project area would be from the sea wall levee road and the dirt road near the Horse Stable Pond pump house. Following completion*

*of each season's restoration activities (anticipated between May 1 and October 15), those staging and storage areas that are not permanently modified would be scarified, recontoured, and hydroseeded with native vegetation to approximate their pre-disturbance condition.*

*Creating, restoring, and enhancing California red-legged frog and San Francisco garter snake habitat at Laguna Salada would also involve a reconfiguration of some holes of Sharp Park Golf Course and converting a portion of the area currently occupied by the course to Natural Area. Approximately 13 acres of the golf course would be modified to create important upland habitat adjacent to the wetlands for the endangered San Francisco garter snake, to discourage frogs from depositing egg masses in locations where the resulting tadpoles may end up being stranded, and to allow for creation of new wetlands to compensate for those filled during restoration. In order to create a habitat corridor between Horse Stable Pond and Laguna Salada, Holes 10 and 13 would be slightly shortened or narrowed, and the existing Hole 12 would be permanently closed and relocated to another area. The habitat corridor would cover approximately six acres, bringing the total of modified area at the golf course to about 19 acres.*

*To protect the frogs and snakes during restoration work, the SFRPD anticipates conducting the restoration activities between May 1 and October 15 and would continue to coordinate the planning and undertaking of those activities with the USFWS and CDFG; this activity period avoids the breeding season for California red-legged frog and the season when San Francisco garter snakes are inactive in their winter burrows. The SFRPD would coordinate with the San Mateo County Mosquito and Vector Control District on the proposed changes to Laguna Salada to minimize the potential for development of mosquito breeding habitat.*

*While management options for the Sharp Park sea wall, including a naturally managed sea wall and shoreline, have been considered by the SFRPD, those options are not proposed as part of the SNRAMP.*

*Following completion of the restoration activities, the SFRPD would conduct maintenance to ensure the success of those activities. The scope of the maintenance is subject to modification during consultation with the USFWS pursuant to the ESA and through other regulatory approval processes. Maintenance would include weeding and maintaining the restored areas. Maintenance of the wetland areas may include removal of invasive plant species and additional planting of wetland plant species. As needed, the SFRPD also would conduct small-scale dredging of accumulated sediments from the wetlands using a backhoe. Maintaining the sediment basins would involve the periodic removal of accumulated sediment. Needed surveys would be coordinated with the USFWS and CDFG to ensure compliance with endangered species laws and regulations (SFRPD 2009a). Wetland functionality would be assessed using ecologically based criteria to determine success of the project objectives.*

*The most recent restoration plan for which the Laguna Salada restoration plan is based upon are shown in figure 3 of the EIR.*

*Added a discussion of the ongoing management measures at Horse Stable Pond, as presented below (Section III.I.23 of the EIR):*

*SFRPD would continue to use pumps to manage water levels in Horse Stable Pond to conserve the California red-legged frog by conducting post-rainfall inspections of the pond for California red-legged frog egg masses and making any pumping changes necessary to prevent stranding and other impacts to egg masses, if found to be present.*

19. Everson/Digby. The Everson/Digby Natural Area was added as the 32nd Natural Area in the Natural Areas Program, as detailed in Attachment 1. (Section III.I.27 of the EIR)
20. General Recommendation GR-8a. Lake Merced was removed from the list of Dog Play Areas whose boundaries and locations would be retained. (Section III.H of the EIR)
21. Recommended management action IB-1c. California seablite (*Suaeda californica*) was added to the list of plants whose populations should be augmented. (Section III.I.15 of the EIR)
22. Recommended management action IG-2b. Language was added that only appropriate social trails would be formalized and inappropriate trails would be eliminated. (Section III.I.16 of the EIR)
23. Recommended management action MP-9b. Monitoring was expanded to include the Geneva Avenue dog play area. (Section III.I.19 of the EIR)
24. Recommended management action PL-1b. The phrase associated with the Pine Lake Park Improvement Project was removed, as that project has been completed. (Section III.I.22 of the EIR)
25. Recommended management action PL-7a. The number of dedicated access points to Pine Lake was changed from two to one. (Section III.I.22 of the EIR)
26. Recommended management action TK-2a. Language was added indicating that installed vegetation would include oaks. (Section III.I.24 of the EIR)
27. Recommended management action TP-3a. The following text was added: "Explore options with the San Francisco Municipal Transit Agency to convert a portion of Twin Peaks Boulevard to a multi-use trail." (Section III.I.25 of the EIR)

SFRPD intends to implement the recommended measures from the SNRAMP in our management of the Recreation and Park's Natural Areas, including the work practices related to integrated pest management and best management practices, as detailed in Section III.E.5 of the EIR, in a site appropriate manner.

Sincerely,



Dawn Kamalanathan  
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