

ATTACHMENTS

Significant Natural Resource Areas Management Plan (Volume IV)

CITY AND COUNTY OF SAN FRANCISCO
PLANNING DEPARTMENT
CASE NO. **2005.0912E**

STATE CLEARINGHOUSE NO. 2009042102



SAN FRANCISCO
PLANNING
DEPARTMENT

	Draft EIR Publication Date:	AUGUST 31, 2011
	Draft EIR Public Hearing Date:	OCTOBER 6, 2011
	Draft EIR Public Comment Period:	AUGUST 31, 2011, to OCTOBER 17, 2011, and APRIL 27, 2012, TO JUNE 11, 2012
	Final EIR Certification Hearing Date:	DECEMBER 15, 2016

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ENVIRONMENTAL PLANNING DIVISION | SAN FRANCISCO PLANNING DEPARTMENT

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Attachment A Responses by Commenter

Attachment A: Responses by Commenter

Comment Letter No.	Commenter	Organization	Individual Comment No.	RTC Comment/Response No.
NPS-1	Frank Dean	National Park Service	NPS-1-01	PD-26
NPS-1	Frank Dean	National Park Service	NPS-1-02	AL-7
NPS-1	Frank Dean	National Park Service	NPS-1-03	GE-1
NPS-1	Frank Dean	National Park Service	NPS-1-04	G-22
NPS-1	Frank Dean	National Park Service	NPS-1-05	G-23
NPS-1	Frank Dean	National Park Service	NPS-1-06	G-24
NPS-1	Frank Dean	National Park Service	NPS-1-07	G-1
NPS-1	Frank Dean	National Park Service	NPS-1-08	RE-13
NPS-1	Frank Dean	National Park Service	NPS-1-09	TR-2
NPS-1	Frank Dean	National Park Service	NPS-1-10	G-15
NPS-1	Frank Dean	National Park Service	NPS-1-11	G-15
NPS-1	Frank Dean	National Park Service	NPS-1-12	PD-13
NPS-1	Frank Dean	National Park Service	NPS-1-13	PD-1
NPS-1	Frank Dean	National Park Service	NPS-1-14	PD-28
NPS-1	Frank Dean	National Park Service	NPS-1-15	PD-35
NPS-1	Frank Dean	National Park Service	NPS-1-16	PD-13
NPS-1	Frank Dean	National Park Service	NPS-1-17	PD-29
NPS-1	Frank Dean	National Park Service	NPS-1-18	PD-13
NPS-1	Frank Dean	National Park Service	NPS-1-19	PD-13
CCC-1	Renee Ananda	California Coastal Commission	CCC-1-01	BI-26
CCC-1	Renee Ananda	California Coastal Commission	CCC-1-02	BI-19
CCC-1	Renee Ananda	California Coastal Commission	CCC-1-03	HY-3
CCC-1	Renee Ananda	California Coastal Commission	CCC-1-04	BI-19
NAHC-1	Katy Sanchez	Native American Heritage Commission	NAHC-1-01	CP-6
OPR-1	Scott Morgan	Office of Planning and Research	OPR-1-01	G-10
BAAQMD-1	Christine Holmes	Bay Area Air Quality Management District	BAAQMD-1-01	PD-1
City of Pacifica-1	Mary Ann Nihart	City of Pacifica	City of Pacifica-1-01	G-11
HPC-1	Charles Chase	San Francisco Historic Preservation Commission	HPC-1-01	CP-2
HPC-1	Charles Chase	San Francisco Historic Preservation Commission	HPC-1-02	CP-5
HPC-1	Charles Chase	San Francisco Historic Preservation Commission	HPC-1-03	CP-5
HPC-1	Charles Chase	San Francisco Historic Preservation Commission	HPC-1-04	CP-4
HPC-1	Charles Chase	San Francisco Historic Preservation Commission	HPC-1-05	G-14
BAGCNC-1	Nathaniel Jackson	Bay Area Golf Club of Northern California	BAGCNC-1-01	PD-14
BDunes-1	Michael Keiser	Bandon Dunes	BDunes-1-01	CP-1
CAAONC-1	Charles Pakerian	Council of Armenian American Organizations of Northern California	CAAONC-1-01	G-11
CAAONC-1	Charles Pakerian	Council of Armenian American Organizations of Northern California	CAAONC-1-02	PD-1
CBD-1	Jeff Miller	Center for Biological Diversity	CBD-1-01	PD-1
CBD-1	Jeff Miller	Center for Biological Diversity	CBD-1-02	PD-12
CBD-1	Jeff Miller	Center for Biological Diversity	CBD-1-03	PD-15
CBD-1	Jeff Miller	Center for Biological Diversity	CBD-1-04	AL-10
CFDG-1	Martha Walters	Crissy Field Dog Group	CFDG-1-01	G-25
CFDG-1	Martha Walters	Crissy Field Dog Group	CFDG-1-02	G-25
CFDG-1	Martha Walters	Crissy Field Dog Group	CFDG-1-03	G-25
CFDG-1	Martha Walters	Crissy Field Dog Group	CFDG-1-04	G-17
CFDG-1	Martha Walters	Crissy Field Dog Group	CFDG-1-05	RE-13
CFDG-1	Martha Walters	Crissy Field Dog Group	CFDG-1-06	RE-3
CFDG-1	Martha Walters	Crissy Field Dog Group	CFDG-1-07	TR-1
CFDG-1	Martha Walters	Crissy Field Dog Group	CFDG-1-08	TR-1
CFDG-1	Martha Walters	Crissy Field Dog Group	CFDG-1-09	HZ-1
CFDG-1	Martha Walters	Crissy Field Dog Group	CFDG-1-10	G-26

Attachment A: Responses by Commenter

Comment Letter No.	Commenter	Organization	Individual Comment No.	RTC Comment/Response No.
CFDG-1	Martha Walters	Crissy Field Dog Group	CFDG-1-11	PD-23
CFDG-1	Martha Walters	Crissy Field Dog Group	CFDG-1-12	G-26
CNPS-1	Jake Sigg	California Native Plant Society	CNPS-1-01	BI-27
CNPS-1	Jake Sigg	California Native Plant Society	CNPS-1-02	BI-15
CNPS-1	Jake Sigg	California Native Plant Society	CNPS-1-03	BI-22
CNPS-1	Jake Sigg	California Native Plant Society	CNPS-1-04	BI-18
CNPS-1	Jake Sigg	California Native Plant Society	CNPS-1-05	AL-10
DB-1	Janet Slissman	Doggie Business	DB-1-01	G-19
DB-1	Janet Slissman	Doggie Business	DB-1-02	AL-8
DogPACSF-1	Bruce Wolfe	Dog PAC of SF	DogPACSF-1-01	RE-3
DogPACSF-1	Bruce Wolfe	Dog PAC of SF	DogPACSF-1-02	HZ-1
DogPACSF-1	Bruce Wolfe	Dog PAC of SF	DogPACSF-1-03	G-25
DogPACSF-1	Bruce Wolfe	Dog PAC of SF	DogPACSF-1-04	G-25
DogPACSF-1	Bruce Wolfe	Dog PAC of SF	DogPACSF-1-05	G-17
DogPACSF-1	Bruce Wolfe	Dog PAC of SF	DogPACSF-1-06	RE-13
DogPACSF-1	Bruce Wolfe	Dog PAC of SF	DogPACSF-1-07	RE-3
DogPACSF-1	Bruce Wolfe	Dog PAC of SF	DogPACSF-1-08	RE-1
DogPACSF-1	Bruce Wolfe	Dog PAC of SF	DogPACSF-1-09	RE-2
DogPACSF-1	Bruce Wolfe	Dog PAC of SF	DogPACSF-1-10	G-23
DogPACSF-1	Bruce Wolfe	Dog PAC of SF	DogPACSF-1-11	RE-7
DogPACSF-1	Bruce Wolfe	Dog PAC of SF	DogPACSF-1-12	HZ-1
DogPACSF-1	Bruce Wolfe	Dog PAC of SF	DogPACSF-1-13	TR-1
DogPACSF-1	Bruce Wolfe	Dog PAC of SF	DogPACSF-1-14	G-26
DogPACSF-1	Bruce Wolfe	Dog PAC of SF	DogPACSF-1-15	PD-23
DogPACSF-1	Bruce Wolfe	Dog PAC of SF	DogPACSF-1-16	LU-3
DogPACSF-1	Bruce Wolfe	Dog PAC of SF	DogPACSF-1-17	G-26
DogPACSF-1	Bruce Wolfe	Dog PAC of SF	DogPACSF-1-18	RE-9
DogPACSF-1	Bruce Wolfe	Dog PAC of SF	DogPACSF-1-19	RE-8
DogPACSF-1	Bruce Wolfe	Dog PAC of SF	DogPACSF-1-20	G-6
DogPACSF-1	Bruce Wolfe	Dog PAC of SF	DogPACSF-1-21	AE-2
DogPACSF-1	Bruce Wolfe	Dog PAC of SF	DogPACSF-1-22	GG-1
DogPACSF-1	Bruce Wolfe	Dog PAC of SF	DogPACSF-1-23	GG-2
FOW-GGP-1	Robert Bakewell	Friends of Oak Woodlands - Golden Gate Park	FOW-GGP-1-01	G-11
FOW-GGP-1	Robert Bakewell	Friends of Oak Woodlands - Golden Gate Park	FOW-GGP-1-02	PD-1
GCSAA-1	J. Rhett Evans	Golf Course Superintendents Association of America	GCSAA-1-01	CP-1
GGAS-1	Michael Lynes	Golden Gate Audobon Society	GGAS-1-01	PD-12
GGAS-1	Michael Lynes	Golden Gate Audobon Society	GGAS-1-02	BI-23
GGAS-1	Michael Lynes	Golden Gate Audobon Society	GGAS-1-03	PD-10
GGAS-1	Michael Lynes	Golden Gate Audobon Society	GGAS-1-04	G-10
GGAS-1	Michael Lynes	Golden Gate Audobon Society	GGAS-1-05	PD-1
GGAS-1	Michael Lynes	Golden Gate Audobon Society	GGAS-1-06	PD-1
GGAS-1	Michael Lynes	Golden Gate Audobon Society	GGAS-1-07	BI-32
GGAS-1	Michael Lynes	Golden Gate Audobon Society	GGAS-1-08	PD-1
GGAS-1	Michael Lynes	Golden Gate Audobon Society	GGAS-1-09	GG-1
GGAS-1	Michael Lynes	Golden Gate Audobon Society	GGAS-1-10	GE-1
GGAS-1	Michael Lynes	Golden Gate Audobon Society	GGAS-1-11	G-4
GGAS-1	Michael Lynes	Golden Gate Audobon Society	GGAS-1-12	BI-32
GGAS-1	Michael Lynes	Golden Gate Audobon Society	GGAS-1-13	PD-24
GGAS-1	Michael Lynes	Golden Gate Audobon Society	GGAS-1-14	G-16
GGAS-1	Michael Lynes	Golden Gate Audobon Society	GGAS-1-15	G-16

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Comment Letter No.	Commenter	Organization	Individual Comment No.	RTC Comment/Response No.
GGAS-1	Michael Lynes	Golden Gate Audobon Society	GGAS-1-16	G-25
GGAS-1	Michael Lynes	Golden Gate Audobon Society	GGAS-1-17	BI-32
GGAS-1	Michael Lynes	Golden Gate Audobon Society	GGAS-1-18	PD-17
GGAS-1	Michael Lynes	Golden Gate Audobon Society	GGAS-1-19	PD-1
GGAS-1	Michael Lynes	Golden Gate Audobon Society	GGAS-1-20	G-16
GGAS-1	Michael Lynes	Golden Gate Audobon Society	GGAS-1-21	PD-2
GGAS-1	Michael Lynes	Golden Gate Audobon Society	GGAS-1-22	PD-19
GGAS-1	Michael Lynes	Golden Gate Audobon Society	GGAS-1-23	PD-1
GGAS-1	Michael Lynes	Golden Gate Audobon Society	GGAS-1-24	PD-1
GGAS-1	Michael Lynes	Golden Gate Audobon Society	GGAS-1-25	PD-25
GGAS-1	Michael Lynes	Golden Gate Audobon Society	GGAS-1-26	PD-20
GGAS-1	Michael Lynes	Golden Gate Audobon Society	GGAS-1-27	G-16
GGAS-1	Michael Lynes	Golden Gate Audobon Society	GGAS-1-28	BI-1
GGAS-1	Michael Lynes	Golden Gate Audobon Society	GGAS-1-29	BI-35
GGAS-1	Michael Lynes	Golden Gate Audobon Society	GGAS-1-30	BI-13
GGAS-1	Michael Lynes	Golden Gate Audobon Society	GGAS-1-31	BI-6
GGHNA-1	Sally Stephens	Golden Gate Heights Neighborhood Association	GGHNA-1-01	GE-2
GGHNA-1	Sally Stephens	Golden Gate Heights Neighborhood Association	GGHNA-1-02	GE-2
GGHNA-1	Sally Stephens	Golden Gate Heights Neighborhood Association	GGHNA-1-03	AE-5
GGHNA-1	Sally Stephens	Golden Gate Heights Neighborhood Association	GGHNA-1-04	RE-9
GGHNA-1	Sally Stephens	Golden Gate Heights Neighborhood Association	GGHNA-1-05	G-6
GHCC-1	Paul Grech and Joseph Michelucci	Green Hills Country Club	GHCC-1-01	CP-1
GLS-1	Various Commentors	Gay and Lesbian Sierrans	GLS-1-01	PD-1
MGSG-1	Amber Hasselbring	Mission Greenbelt Sidewalk Gardens	MGSG-1-01	PD-1
MGSG-1	Amber Hasselbring	Mission Greenbelt Sidewalk Gardens	MGSG-1-02	G-11
MPIC-1	Dan Liberthson	Miraloma Park Improvement Club	MPIC-1-01	AL-7
MPIC-1	Dan Liberthson	Miraloma Park Improvement Club	MPIC-1-02	AL-5
MPIC-1	Dan Liberthson	Miraloma Park Improvement Club	MPIC-1-03	BI-12
MPIC-1	Dan Liberthson	Miraloma Park Improvement Club	MPIC-1-04	BI-12
MPIC-1	Dan Liberthson	Miraloma Park Improvement Club	MPIC-1-05	CP-8
MPIC-1	Dan Liberthson	Miraloma Park Improvement Club	MPIC-1-06	AE-1
MPIC-1	Dan Liberthson	Miraloma Park Improvement Club	MPIC-1-07	BI-34
MPIC-1	Dan Liberthson	Miraloma Park Improvement Club	MPIC-1-08	AL-6
MPIC-1	Dan Liberthson	Miraloma Park Improvement Club	MPIC-1-09	AE-2
MPIC-1	Dan Liberthson	Miraloma Park Improvement Club	MPIC-1-10	NO-1
MPIC-1	Dan Liberthson	Miraloma Park Improvement Club	MPIC-1-11	WS-1
MPIC-1	Dan Liberthson	Miraloma Park Improvement Club	MPIC-1-12	PD-20
MPIC-1	Dan Liberthson	Miraloma Park Improvement Club	MPIC-1-13	RE-11
MPIC-1	Dan Liberthson	Miraloma Park Improvement Club	MPIC-1-14	G-4
MPIC-1	Dan Liberthson	Miraloma Park Improvement Club	MPIC-1-15	BI-14
MPIC-1	Dan Liberthson	Miraloma Park Improvement Club	MPIC-1-16	PD-20
MPIC-1	Dan Liberthson	Miraloma Park Improvement Club	MPIC-1-17	PD-20
MPIC-1	Dan Liberthson	Miraloma Park Improvement Club	MPIC-1-18	PD-30
MPIC-2	Dan Liberthson	Miraloma Park Improvement Club	MPIC-2-01	AL-10
MPIC-2	Dan Liberthson	Miraloma Park Improvement Club	MPIC-2-02	PD-3
MPIC-2	Dan Liberthson	Miraloma Park Improvement Club	MPIC-2-03	PD-30
MPIC-2	Dan Liberthson	Miraloma Park Improvement Club	MPIC-2-04	CP-8
MPIC-2	Dan Liberthson	Miraloma Park Improvement Club	MPIC-2-05	CP-9
MPIC-2	Dan Liberthson	Miraloma Park Improvement Club	MPIC-2-06	G-4
MPIC-2	Dan Liberthson	Miraloma Park Improvement Club	MPIC-2-07	PD-10

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Comment Letter No.	Commenter	Organization	Individual Comment No.	RTC Comment/Response No.
MPIC-2	Dan Liberthson	Miraloma Park Improvement Club	MPIC-2-08	WS-1
MPIC-2	Dan Liberthson	Miraloma Park Improvement Club	MPIC-2-09	CP-8
MPIC-2	Dan Liberthson	Miraloma Park Improvement Club	MPIC-2-10	LU-4
MPIC-2	Dan Liberthson	Miraloma Park Improvement Club	MPIC-2-11	PD-20
MPIC-2	Dan Liberthson	Miraloma Park Improvement Club	MPIC-2-12	BI-12
MPIC-2	Dan Liberthson	Miraloma Park Improvement Club	MPIC-2-13	BI-24
MPIC-2	Dan Liberthson	Miraloma Park Improvement Club	MPIC-2-14	GG-1
MPIC-2	Dan Liberthson	Miraloma Park Improvement Club	MPIC-2-15	CP-9
MPIC-2	Dan Liberthson	Miraloma Park Improvement Club	MPIC-2-16	GE-3
MPIC-2	Dan Liberthson	Miraloma Park Improvement Club	MPIC-2-17	AE-1
MPIC-2	Dan Liberthson	Miraloma Park Improvement Club	MPIC-2-18	PD-10
MPIC-2	Dan Liberthson	Miraloma Park Improvement Club	MPIC-2-19	PD-20
MPIC-2	Dan Liberthson	Miraloma Park Improvement Club	MPIC-2-20	PD-20
MPIC-2	Dan Liberthson	Miraloma Park Improvement Club	MPIC-2-21	RE-12
MPIC-2	Dan Liberthson	Miraloma Park Improvement Club	MPIC-2-22	NO-1
MPIC-2	Dan Liberthson	Miraloma Park Improvement Club	MPIC-2-23	HZ-1
MPIC-2	Dan Liberthson	Miraloma Park Improvement Club	MPIC-2-24	HZ-1
MPIC-2	Dan Liberthson	Miraloma Park Improvement Club	MPIC-2-25	HZ-1
MPIC-2	Dan Liberthson	Miraloma Park Improvement Club	MPIC-2-26	HZ-1
MPIC-2	Dan Liberthson	Miraloma Park Improvement Club	MPIC-2-27	BI-13
NGCOA-1	Michael K. Hughes	National Golf Course Owners Association	NGCOA-1-01	CP-1
NTC-1	Peter Brastow	Nature in the City	NTC-1-01	AL-2
NTC-1	Peter Brastow	Nature in the City	NTC-1-02	AL-10
NTC-1	Peter Brastow	Nature in the City	NTC-1-03	PD-12
NTC-2	Peter Brastow	Nature in the City	NTC-2-01	G-10
PGA-1	Allen Wronowski	Professional Golfers' Association of America	PGA-1-01	CP-1
PGA-1	Allen Wronowski	Professional Golfers' Association of America	PGA-1-02	PD-14
SCBC-1	Arthur Feinstein	Sierra Club Bay Chapter	SCBC-1-01	G-10
SFDOG-1	Sally Stephens	San Francisco Dog Owners Group	SFDOG-1-01	AL-8
SFDOG-1	Sally Stephens	San Francisco Dog Owners Group	SFDOG-1-02	RE-1
SFDOG-1	Sally Stephens	San Francisco Dog Owners Group	SFDOG-1-03	G-25
SFDOG-1	Sally Stephens	San Francisco Dog Owners Group	SFDOG-1-04	G-26
SFDOG-1	Sally Stephens	San Francisco Dog Owners Group	SFDOG-1-05	RE-13
SFDOG-2	Sally Stephens	San Francisco Dog Owners Group	SFDOG-2-01	G-10
SFDOG-2	Sally Stephens	San Francisco Dog Owners Group	SFDOG-2-02	G-10
SFDOG-2	Sally Stephens	San Francisco Dog Owners Group	SFDOG-2-03	G-25
SFDOG-2	Sally Stephens	San Francisco Dog Owners Group	SFDOG-2-04	G-19
SFDOG-2	Sally Stephens	San Francisco Dog Owners Group	SFDOG-2-05	G-25
SFDOG-2	Sally Stephens	San Francisco Dog Owners Group	SFDOG-2-06	G-17
SFDOG-2	Sally Stephens	San Francisco Dog Owners Group	SFDOG-2-07	RE-13
SFDOG-2	Sally Stephens	San Francisco Dog Owners Group	SFDOG-2-08	RE-3
SFDOG-2	Sally Stephens	San Francisco Dog Owners Group	SFDOG-2-09	RE-1
SFDOG-2	Sally Stephens	San Francisco Dog Owners Group	SFDOG-2-10	RE-2
SFDOG-2	Sally Stephens	San Francisco Dog Owners Group	SFDOG-2-11	G-23
SFDOG-2	Sally Stephens	San Francisco Dog Owners Group	SFDOG-2-12	RE-7
SFDOG-2	Sally Stephens	San Francisco Dog Owners Group	SFDOG-2-13	HZ-1
SFDOG-2	Sally Stephens	San Francisco Dog Owners Group	SFDOG-2-14	G-26
SFDOG-2	Sally Stephens	San Francisco Dog Owners Group	SFDOG-2-15	PD-23
SFDOG-2	Sally Stephens	San Francisco Dog Owners Group	SFDOG-2-16	G-26
SFDOG-2	Sally Stephens	San Francisco Dog Owners Group	SFDOG-2-17	G-26

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Comment Letter No.	Commenter	Organization	Individual Comment No.	RTC Comment/Response No.
SFDOG-2	Sally Stephens	San Francisco Dog Owners Group	SFDOG-2-18	RE-9
SFDOG-2	Sally Stephens	San Francisco Dog Owners Group	SFDOG-2-19	HZ-2
SFDOG-2	Sally Stephens	San Francisco Dog Owners Group	SFDOG-2-20	RE-8
SFDOG-2	Sally Stephens	San Francisco Dog Owners Group	SFDOG-2-21	G-6
SFDOG-2	Sally Stephens	San Francisco Dog Owners Group	SFDOG-2-22	AE-2
SFDOG-2	Sally Stephens	San Francisco Dog Owners Group	SFDOG-2-23	GG-1
SFDOG-2	Sally Stephens	San Francisco Dog Owners Group	SFDOG-2-24	GG-2
SFFA-1	Eric Miller	San Francisco Forest Alliance	SFFA-1-01	G-10
SFFA-2	Eric Miller	San Francisco Forest Alliance	SFFA-2-01	G-10
SFFA-3	Eric Miller	San Francisco Forest Alliance	SFFA-3-01	BI-33
SFFA-3	Eric Miller	San Francisco Forest Alliance	SFFA-3-02	BI-24
SFFA-3	Eric Miller	San Francisco Forest Alliance	SFFA-3-03	WS-1
SFFA-3	Eric Miller	San Francisco Forest Alliance	SFFA-3-04	GE-3
SFFA-3	Eric Miller	San Francisco Forest Alliance	SFFA-3-05	GG-1
SFFA-3	Eric Miller	San Francisco Forest Alliance	SFFA-3-06	AQ-1
SFFA-3	Eric Miller	San Francisco Forest Alliance	SFFA-3-07	HZ-1
SFFA-3	Eric Miller	San Francisco Forest Alliance	SFFA-3-08	HZ-1
SFFA-3	Eric Miller	San Francisco Forest Alliance	SFFA-3-09	HZ-1
SFFA-3	Eric Miller	San Francisco Forest Alliance	SFFA-3-10	HZ-1
SFFA-3	Eric Miller	San Francisco Forest Alliance	SFFA-3-11	HZ-1
SFFA-3	Eric Miller	San Francisco Forest Alliance	SFFA-3-12	G-3
SFFA-3	Eric Miller	San Francisco Forest Alliance	SFFA-3-13	BI-29
SFFA-3	Eric Miller	San Francisco Forest Alliance	SFFA-3-14	BI-11
SFFA-3	Eric Miller	San Francisco Forest Alliance	SFFA-3-15	RE-10
SFFA-3	Eric Miller	San Francisco Forest Alliance	SFFA-3-16	RE-10
SFFA-3	Eric Miller	San Francisco Forest Alliance	SFFA-3-17	RE-11
SFFA-3	Eric Miller	San Francisco Forest Alliance	SFFA-3-18	RE-8
SFFA-3	Eric Miller	San Francisco Forest Alliance	SFFA-3-19	RE-9
SFFA-3	Eric Miller	San Francisco Forest Alliance	SFFA-3-20	RE-13
SFFA-3	Eric Miller	San Francisco Forest Alliance	SFFA-3-21	AE-6
SFFA-3	Eric Miller	San Francisco Forest Alliance	SFFA-3-22	AL-8
SFFA-3	Eric Miller	San Francisco Forest Alliance	SFFA-3-23	AL-10
SFFA-3	Eric Miller	San Francisco Forest Alliance	SFFA-3-24	G-10
SFFA-3	Eric Miller	San Francisco Forest Alliance	SFFA-3-25	HZ-4
SFPGA-1	Richard Harris	San Francisco Public Golf Alliance	SFPGA-1-01	CP-1
SFPGA-1	Richard Harris	San Francisco Public Golf Alliance	SFPGA-1-02	CP-3
SFPGA-1	Richard Harris	San Francisco Public Golf Alliance	SFPGA-1-03	CP-3
SFPGA-1	Richard Harris	San Francisco Public Golf Alliance	SFPGA-1-04	CP-3
SFPGA-1	Richard Harris	San Francisco Public Golf Alliance	SFPGA-1-05	CP-4
SFPGA-1	Richard Harris	San Francisco Public Golf Alliance	SFPGA-1-06	CP-4
SFPGA-2	Richard Harris	San Francisco Public Golf Alliance	SFPGA-2-01	CP-1
SFPGA-2	Richard Harris	San Francisco Public Golf Alliance	SFPGA-2-02	CP-1
SFPGA-2	Richard Harris	San Francisco Public Golf Alliance	SFPGA-2-03	CP-1
SFPGA-2	Richard Harris	San Francisco Public Golf Alliance	SFPGA-2-04	CP-1
SFPGA-2	Richard Harris	San Francisco Public Golf Alliance	SFPGA-2-05	PD-14
SFPGA-2	Richard Harris	San Francisco Public Golf Alliance	SFPGA-2-06	CP-1
SFPGA-3	Richard Harris	San Francisco Public Golf Alliance	SFPGA-3-01	HY-1
SFPGA-3	Richard Harris	San Francisco Public Golf Alliance	SFPGA-3-02	LU-1
SFPGA-3	Richard Harris	San Francisco Public Golf Alliance	SFPGA-3-03	HY-4
SFPGA-3	Richard Harris	San Francisco Public Golf Alliance	SFPGA-3-04	CP-3

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Comment Letter No.	Commenter	Organization	Individual Comment No.	RTC Comment/Response No.
SFPGA-3	Richard Harris	San Francisco Public Golf Alliance	SFPGA-3-05	CP-3
SFPGA-3	Richard Harris	San Francisco Public Golf Alliance	SFPGA-3-06	CP-3
SFPGA-3	Richard Harris	San Francisco Public Golf Alliance	SFPGA-3-07	CP-4
SFPGA-3	Richard Harris	San Francisco Public Golf Alliance	SFPGA-3-08	CP-4
SFPGA-3	Richard Harris	San Francisco Public Golf Alliance	SFPGA-3-09	CP-4
SFPGA-3	Richard Harris	San Francisco Public Golf Alliance	SFPGA-3-10	CP-4
SFPGA-3	Richard Harris	San Francisco Public Golf Alliance	SFPGA-3-11	G-3
SFPGA-3	Richard Harris	San Francisco Public Golf Alliance	SFPGA-3-12	BI-7
SFPGA-3	Richard Harris	San Francisco Public Golf Alliance	SFPGA-3-13	PD-13
SFPGA-3	Richard Harris	San Francisco Public Golf Alliance	SFPGA-3-14	BI-2
SFPGA-3	Richard Harris	San Francisco Public Golf Alliance	SFPGA-3-15	PD-13
SFSPCA-1	Jennifer Scarlett	San Francisco Society for the Prevention of Cruelty to Animals	SFSPCA-1-01	G-19
SFT-1	Jennifer Clary	San Francisco Tomorrow	SFT-1-01	BI-15
SFT-1	Jennifer Clary	San Francisco Tomorrow	SFT-1-02	PD-27
SFT-1	Jennifer Clary	San Francisco Tomorrow	SFT-1-03	AL-10
SFT-1	Jennifer Clary	San Francisco Tomorrow	SFT-1-04	AL-2
SFT-1	Jennifer Clary	San Francisco Tomorrow	SFT-1-05	PD-12
SF Tree-1	Carolyn Blair	San Francisco Tree Council	SF Tree-1-01	BI-33
SF Tree-1	Carolyn Blair	San Francisco Tree Council	SF Tree-1-02	BI-33
Sierra Club-1	Arthur Feinstein	Sierra Club San Francisco Bay Chapter	Sierra Club-1-01	AL-3
Sierra Club-1	Arthur Feinstein	Sierra Club San Francisco Bay Chapter	Sierra Club-1-02	PD-12
Sierra Club-1	Arthur Feinstein	Sierra Club San Francisco Bay Chapter	Sierra Club-1-03	G-11
Sierra Club-1	Arthur Feinstein	Sierra Club San Francisco Bay Chapter	Sierra Club-1-04	AL-10
Sierra Club-1	Arthur Feinstein	Sierra Club San Francisco Bay Chapter	Sierra Club-1-05	PD-1
Sierra Club-1	Arthur Feinstein	Sierra Club San Francisco Bay Chapter	Sierra Club-1-06	PD-1
Sierra Club-1	Arthur Feinstein	Sierra Club San Francisco Bay Chapter	Sierra Club-1-07	PD-1
Sierra Club-1	Arthur Feinstein	Sierra Club San Francisco Bay Chapter	Sierra Club-1-08	PD-13
Sierra Club-1	Arthur Feinstein	Sierra Club San Francisco Bay Chapter	Sierra Club-1-09	CP-2
Sierra Club-1	Arthur Feinstein	Sierra Club San Francisco Bay Chapter	Sierra Club-1-10	G-13
Sierra Club-1	Arthur Feinstein	Sierra Club San Francisco Bay Chapter	Sierra Club-1-11	BI-4
Sierra Club-1	Arthur Feinstein	Sierra Club San Francisco Bay Chapter	Sierra Club-1-12	BI-5
Sierra Club-1	Arthur Feinstein	Sierra Club San Francisco Bay Chapter	Sierra Club-1-13	HY-2
Tank Hill Neighbors-1	Various Commentors	Tank Hill Neighbors	Tank Hill Neighbors-1-01	BI-33
Tank Hill Neighbors-1	Various Commentors	Tank Hill Neighbors	Tank Hill Neighbors-1-02	BI-33
Tank Hill Neighbors-1	Various Commentors	Tank Hill Neighbors	Tank Hill Neighbors-1-03	AL-5
Tank Hill Neighbors-1	Various Commentors	Tank Hill Neighbors	Tank Hill Neighbors-1-04	AL-8
WEI-1	Brent Plater	Wild Equity Institute	WEI-1-01	PD-12
WEI-1	Brent Plater	Wild Equity Institute	WEI-1-02	PD-10
WEI-1	Brent Plater	Wild Equity Institute	WEI-1-03	CP-2
WEI-1	Brent Plater	Wild Equity Institute	WEI-1-04	G-13
WEI-1	Brent Plater	Wild Equity Institute	WEI-1-05	PD-13
WEI-2	Brent Plater	Wild Equity Institute	WEI-2-01	G-10
WGF-1	Stephen F. Mona	World Golf Foundation	WGF-1-01	CP-7
WTPCC-1	Matt Chamberlain	West of Twin Peaks Central Council	WTPCC-1-01	PD-3
WTPCC-1	Matt Chamberlain	West of Twin Peaks Central Council	WTPCC-1-02	BI-12
WTPCC-1	Matt Chamberlain	West of Twin Peaks Central Council	WTPCC-1-03	GG-1
WTPCC-1	Matt Chamberlain	West of Twin Peaks Central Council	WTPCC-1-04	HZ-1
WTPCC-1	Matt Chamberlain	West of Twin Peaks Central Council	WTPCC-1-05	HZ-1
WTPCC-1	Matt Chamberlain	West of Twin Peaks Central Council	WTPCC-1-06	HZ-1
WTPCC-1	Matt Chamberlain	West of Twin Peaks Central Council	WTPCC-1-07	RE-10

Attachment A: Responses by Commenter

Comment Letter No.	Commenter	Organization	Individual Comment No.	RTC Comment/Response No.
WTPCC-1	Matt Chamberlain	West of Twin Peaks Central Council	WTPCC-1-08	BI-20
WTPCC-1	Matt Chamberlain	West of Twin Peaks Central Council	WTPCC-1-09	G-3
WTPCC-1	Matt Chamberlain	West of Twin Peaks Central Council	WTPCC-1-10	G-10
WTPCC-1	Matt Chamberlain	West of Twin Peaks Central Council	WTPCC-1-11	G-10
WTPCC-1	Matt Chamberlain	West of Twin Peaks Central Council	WTPCC-1-12	PD-11
WTPCC-1	Matt Chamberlain	West of Twin Peaks Central Council	WTPCC-1-13	PD-3
WTPCC-1	Matt Chamberlain	West of Twin Peaks Central Council	WTPCC-1-14	G-4
WTPCC-1	Matt Chamberlain	West of Twin Peaks Central Council	WTPCC-1-15	BI-24
Adam-1	Adam	N/A	Adam-1-01	AL-4
Adams-L-1	Lile Adams	N/A	Adams-L-1-01	G-19
Adams-S-1	Susan Adams	N/A	Adams-S-1-01	PD-4
Ahlberg-1	Todd Ahlberg	N/A	Ahlberg-1-01	G-19
Anonymous-1	Anonymous	N/A	Anonymous-1-01	CP-2
Anonymous-2	Anonymous-2	N/A	Comments noted	No response required
Anonymous-3	Anonymous-3	N/A	Comments noted	No response required
Archer-1	Donna Archer	N/A	Archer-1-01	G-8
Archer-1	Donna Archer	N/A	Archer-1-02	PD-14
Armanini-1	Mark Armanini	N/A	Armanini-1-01	PD-3
Armanini-1	Mark Armanini	N/A	Armanini-1-02	PD-4
Armanini-1	Mark Armanini	N/A	Armanini-1-03	G-25
Art-1	Catherine Art	N/A	Art-1-01	AL-9
Art-1	Catherine Art	N/A	Art-1-02	PD-4
Art-1	Catherine Art	N/A	Art-1-03	BI-13
Art-1	Catherine Art	N/A	Art-1-04	BI-21
Art-1	Catherine Art	N/A	Art-1-05	BI-24
Art-1	Catherine Art	N/A	Art-1-06	G-4
Asher-1	Poe Asher	N/A	Asher-1-01	PD-4
Asher-1	Poe Asher	N/A	Asher-1-02	PD-3
Bachmanov-1	Eugene Bachmanov	N/A	Bachmanov-1-01	BI-33
Barnsdale-1	Mary Barnsdale	N/A	Barnsdale-1-01	PD-3
Bartley-1	Eddie Bartley	N/A	Bartley-1-01	PD-1
Bartley-1	Eddie Bartley	N/A	Bartley-1-02	PD-1
Bartley-1	Eddie Bartley	N/A	Bartley-1-03	BI-32
Bartley-1	Eddie Bartley	N/A	Bartley-1-04	G-4
Bartley-1	Eddie Bartley	N/A	Bartley-1-05	PD-12
Bartley-1	Eddie Bartley	N/A	Bartley-1-06	BI-23
Bartley-1	Eddie Bartley	N/A	Bartley-1-07	G-25
Bartley-1	Eddie Bartley	N/A	Bartley-1-08	G-16
Bartley-1	Eddie Bartley	N/A	Bartley-1-09	BI-23
Bartley-1	Eddie Bartley	N/A	Bartley-1-10	Hy-6
Bartley-1	Eddie Bartley	N/A	Bartley-1-11	G-7
Bartley-1	Eddie Bartley	N/A	Bartley-1-12	BI-36
Bartley-1	Eddie Bartley	N/A	Bartley-1-13	GG-1
Bartolotta-1	Victor Bartolotta	N/A	Bartolotta-1-01	G-25
Bartolotta-1	Victor Bartolotta	N/A	Bartolotta-1-02	G-25
Bartolotta-1	Victor Bartolotta	N/A	Bartolotta-1-03	G-25
Bartolotta-1	Victor Bartolotta	N/A	Bartolotta-1-04	G-25
Bartolotta-1	Victor Bartolotta	N/A	Bartolotta-1-05	G-17

Attachment A: Responses by Commenter

Comment Letter No.	Commenter	Organization	Individual Comment No.	RTC Comment/Response No.
Bartolotta-1	Victor Bartolotta	N/A	Bartolotta-1-06	RE-13
Bartolotta-1	Victor Bartolotta	N/A	Bartolotta-1-07	RE-3
Bartolotta-1	Victor Bartolotta	N/A	Bartolotta-1-08	RE-1
Bartolotta-1	Victor Bartolotta	N/A	Bartolotta-1-09	RE-2
Bartolotta-1	Victor Bartolotta	N/A	Bartolotta-1-10	RE-7
Bartolotta-1	Victor Bartolotta	N/A	Bartolotta-1-11	HZ-1
Bartolotta-1	Victor Bartolotta	N/A	Bartolotta-1-12	TR-1
Bartolotta-1	Victor Bartolotta	N/A	Bartolotta-1-13	G-26
Bartolotta-1	Victor Bartolotta	N/A	Bartolotta-1-14	PD-23
Bartolotta-1	Victor Bartolotta	N/A	Bartolotta-1-15	G-26
Bartolotta-1	Victor Bartolotta	N/A	Bartolotta-1-16	G-5
Bartolotta-1	Victor Bartolotta	N/A	Bartolotta-1-17	RE-9
Bartolotta-1	Victor Bartolotta	N/A	Bartolotta-1-18	RE-10
Bartolotta-1	Victor Bartolotta	N/A	Bartolotta-1-19	AE-6
Bartolotta-1	Victor Bartolotta	N/A	Bartolotta-1-20	AE-2
Bartolotta-1	Victor Bartolotta	N/A	Bartolotta-1-21	GG-1
Bartolotta-1	Victor Bartolotta	N/A	Bartolotta-1-22	GG-2
Baye-1	Peter Baye	N/A	Baye-1-01	BI-25
Baye-1	Peter Baye	N/A	Baye-1-02	BI-7
Baye-1	Peter Baye	N/A	Baye-1-03	HY-5
Baye-1	Peter Baye	N/A	Baye-1-04	BI-7
Baye-1	Peter Baye	N/A	Baye-1-05	AL-11
Baye-1	Peter Baye	N/A	Baye-1-06	BI-7
Baye-1	Peter Baye	N/A	Baye-1-07	G-9
Baye-1	Peter Baye	N/A	Baye-1-08	HY-2
Baye-1	Peter Baye	N/A	Baye-1-09	HY-2
Baye-1	Peter Baye	N/A	Baye-1-10	BI-8
Baye-1	Peter Baye	N/A	Baye-1-11	BI-7
Baye-1	Peter Baye	N/A	Baye-1-12	BI-10
Baye-1	Peter Baye	N/A	Baye-1-13	BI-7
Baye-1	Peter Baye	N/A	Baye-1-14	BI-7
Beberman-1	Gary Beberman	N/A	Beberman-1-01	G-19
Beemsterboer-1	Joni Beemsterboer	N/A	Beemsterboer-1-01	AL-8
Besser-1	Ken Besser	N/A	Besser-1-01	PD-3
Betcher-1	Peter Betcher	N/A	Betcher-1-01	PD-6
Bley-1	Andrew Bley	N/A	Bley-1-01	PD-4
Blum-1	Jan Blum	N/A	Blum-1-01	PD-12
Blum-1	Jan Blum	N/A	Blum-1-02	PD-12
Blum-1	Jan Blum	N/A	Blum-1-03	G-4
Blum-1	Jan Blum	N/A	Blum-1-04	HY-2
Blum-1	Jan Blum	N/A	Blum-1-05	PD-12
Blum-1	Jan Blum	N/A	Blum-1-06	PD-12
Borden-1	Tom Borden	N/A	Borden-1-01	PD-6
Borden-1	Tom Borden	N/A	Borden-1-02	AL-8
Borden-1	Tom Borden	N/A	Borden-1-03	RE-10
Borden-1	Tom Borden	N/A	Borden-1-04	LU-2
Borden-1	Tom Borden	N/A	Borden-1-05	RE-10
Borden-1	Tom Borden	N/A	Borden-1-06	WS-2
Borden-1	Tom Borden	N/A	Borden-1-07	HZ-5
Bors-1	Margo Bors	N/A	Bors-1-01	PD-1

Attachment A: Responses by Commenter

Comment Letter No.	Commenter	Organization	Individual Comment No.	RTC Comment/Response No.
Bors-1	Margo Bors	N/A	Bors-1-02	PD-16
Bors-1	Margo Bors	N/A	Bors-1-03	PD-12
Bose-1	Rupa Bose	N/A	Bose-1-01	AL-10
Bose-1	Rupa Bose	N/A	Bose-1-02	BI-3
Bose-1	Rupa Bose	N/A	Bose-1-03	HZ-1
Bose-1	Rupa Bose	N/A	Bose-1-04	GG-1
Bose-1	Rupa Bose	N/A	Bose-1-05	GG-1
Bose-1	Rupa Bose	N/A	Bose-1-06	AE-3
Bose-1	Rupa Bose	N/A	Bose-1-07	BI-17
Bose-1	Rupa Bose	N/A	Bose-1-08	BI-24
Bose-1	Rupa Bose	N/A	Bose-1-09	BI-3
Bose-1	Rupa Bose	N/A	Bose-1-10	BI-33
Bose-1	Rupa Bose	N/A	Bose-1-11	BI-36
Bose-1	Rupa Bose	N/A	Bose-1-12	HZ-1
Bose-1	Rupa Bose	N/A	Bose-1-13	HZ-1
Bose-1	Rupa Bose	N/A	Bose-1-14	AL-8
Bose-2	Rupa Bose	N/A	Bose-2-01	BI-27
Bose-2	Rupa Bose	N/A	Bose-2-02	BI-34
Bowling-1	Alane Bowling	N/A	Bowling-1-01	G-11
Bowling-1	Alane Bowling	N/A	Bowling-1-02	PD-12
Bowman-1	Arnita Bowman	N/A	Bowman-1-01	AL-8
Bowman-1	Arnita Bowman	N/A	Bowman-1-02	PD-3
Bowman-1	Arnita Bowman	N/A	Bowman-1-03	HZ-1
Bowman-1	Arnita Bowman	N/A	Bowman-1-04	AE-4
Bowman-1	Arnita Bowman	N/A	Bowman-1-05	CP-1
Bowman-1	Arnita Bowman	N/A	Bowman-1-06	RE-13
Bowman-1	Arnita Bowman	N/A	Bowman-1-07	G-25
Bowman-1	Arnita Bowman	N/A	Bowman-1-08	G-25
Bowman-1	Arnita Bowman	N/A	Bowman-1-09	PD-5
Bowman-1	Arnita Bowman	N/A	Bowman-1-10	G-4
Bowman-1	Arnita Bowman	N/A	Bowman-1-11	HZ-1
Bowman-1	Arnita Bowman	N/A	Bowman-1-12	GG-1
Bowman-1	Arnita Bowman	N/A	Bowman-1-13	PD-31
Bowman-1	Arnita Bowman	N/A	Bowman-1-14	BI-28
Bowman-2	Arnita Bowman	N/A	Bowman-2-01	PD-9
Bowman-2	Arnita Bowman	N/A	Bowman-2-02	BI-33
Bowman-2	Arnita Bowman	N/A	Bowman-2-03	WS-1
Bowman-2	Arnita Bowman	N/A	Bowman-2-04	AE-3
Bowman-2	Arnita Bowman	N/A	Bowman-2-05	BI-30
Bowman-2	Arnita Bowman	N/A	Bowman-2-06	BI-34
Bowman-2	Arnita Bowman	N/A	Bowman-2-07	BI-33
Bowman-2	Arnita Bowman	N/A	Bowman-2-08	RE-10
Bowman-2	Arnita Bowman	N/A	Bowman-2-09	BI-16
Bowman-2	Arnita Bowman	N/A	Bowman-2-10	HZ-1
Bowman-2	Arnita Bowman	N/A	Bowman-2-11	G-5
Bowman-2	Arnita Bowman	N/A	Bowman-2-12	AQ-1
Bowman-2	Arnita Bowman	N/A	Bowman-2-13	PD-20
Bowman-2	Arnita Bowman	N/A	Bowman-2-14	PD-11
Bowman-2	Arnita Bowman	N/A	Bowman-2-15	G-12
Bowman-2	Arnita Bowman	N/A	Bowman-2-16	G-10

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Comment Letter No.	Commenter	Organization	Individual Comment No.	RTC Comment/Response No.
Bowman-2	Arnita Bowman	N/A	Bowman-2-17	G-3
Brown-1	Judith Brown	N/A	Brown-1-01	G-25
Brown-1	Judith Brown	N/A	Brown-1-02	G-17
Brown-1	Judith Brown	N/A	Brown-1-03	RE-13
Brown-1	Judith Brown	N/A	Brown-1-04	RE-3
Brown-1	Judith Brown	N/A	Brown-1-05	RE-1
Brown-1	Judith Brown	N/A	Brown-1-06	RE-2
Brown-1	Judith Brown	N/A	Brown-1-07	G-23
Brown-1	Judith Brown	N/A	Brown-1-08	RE-7
Brown-1	Judith Brown	N/A	Brown-1-09	HZ-1
Brown-1	Judith Brown	N/A	Brown-1-10	TR-1
Brown-1	Judith Brown	N/A	Brown-1-11	G-26
Brown-1	Judith Brown	N/A	Brown-1-12	PD-23
Brown-1	Judith Brown	N/A	Brown-1-13	G-26
Brown-1	Judith Brown	N/A	Brown-1-14	G-26
Brown-1	Judith Brown	N/A	Brown-1-15	RE-9
Brown-1	Judith Brown	N/A	Brown-1-16	RE-8
Brown-1	Judith Brown	N/A	Brown-1-17	G-6
Brown-1	Judith Brown	N/A	Brown-1-18	AE-2
Brown-1	Judith Brown	N/A	Brown-1-19	GG-1
Brown-1	Judith Brown	N/A	Brown-1-20	GG-2
Browne-1	Luke Browne	N/A	Browne-1-01	G-26
Browne-1	Luke Browne	N/A	Browne-1-02	G-25
Browne-1	Luke Browne	N/A	Browne-1-03	G-25
Browne-1	Luke Browne	N/A	Browne-1-04	PD-6
Browning-1	Nadine Browning	N/A	Browning-1-01	G-19
Browning-2	Nadine Browning	N/A	Browning-2-01	G-19
Browning-3	Nadine Browning	N/A	Browning-3-01	G-19
Buckley-1	Kathy Buckley	N/A	Buckley-1-01	G-26
Buckley-1	Kathy Buckley	N/A	Buckley-1-02	G-25
Buckley-1	Kathy Buckley	N/A	Buckley-1-03	RE-13
Buckley-1	Kathy Buckley	N/A	Buckley-1-04	RE-9
Buckley-1	Kathy Buckley	N/A	Buckley-1-05	AL-8
Buffa-1	Andrea Buffa	N/A	Buffa-1-01	AL-8
Buffa-1	Andrea Buffa	N/A	Buffa-1-02	G-19
Buffa-1	Andrea Buffa	N/A	Buffa-1-03	AL-8
Burgard-1	Joe Burgard and Suzanne Kirrane	N/A	Burgard-1-01	PD-4
Burgard-1	Joe Burgard and Suzanne Kirrane	N/A	Burgard-1-02	HZ-4
Burgard-1	Joe Burgard and Suzanne Kirrane	N/A	Burgard-1-03	AE-1
Burgard-1	Joe Burgard and Suzanne Kirrane	N/A	Burgard-1-04	PD-20
Butler-1	Barabara Butler and Jeffrey Beal	N/A	Butler-1-01	G-19
Butler-1	Barabara Butler and Jeffrey Beal	N/A	Butler-1-02	G-25
Butler-1	Barabara Butler and Jeffrey Beal	N/A	Butler-1-03	HZ-1
Cabada-1	Ingrid Cabada	N/A	Cabada-1-01	PD-1
Campbell-C-1	Christopher Campbell	N/A	Campbell-C-1-01	G-11
Campbell-C-1	Christopher Campbell	N/A	Campbell-C-1-02	G-11
Campbell-C-1	Christopher Campbell	N/A	Campbell-C-1-03	PD-1
Campbell-N-1	Norma Campbell	N/A	Campbell-N-1-01	GE-2
Carrington-1	Rick Carrington	N/A	Carrington-1-01	G-19
Carrington-1	Rick Carrington	N/A	Carrington-1-02	RE-13

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Comment Letter No.	Commenter	Organization	Individual Comment No.	RTC Comment/Response No.
Carrington-1	Rick Carrington	N/A	Carrington-1-03	G-6
Caskey-1	Julie Caskey	N/A	Caskey-1-01	PD-7
Caughman-1	Erin Caughman	N/A	Caughman-1-01	AL-8
Cech-1	Nancy Cech	N/A	Cech-1-01	G-19
Cerf-1	Diane Cerf	N/A	Cerf-1-01	AL-8
Cerf-1	Diane Cerf	N/A	Cerf-1-02	G-19
Cerf-1	Diane Cerf	N/A	Cerf-1-03	AL-8
Chambers-1	Thompson Chambers	N/A	Chambers-1-01	G-25
Chambers-1	Thompson Chambers	N/A	Chambers-1-02	G-17
Chambers-1	Thompson Chambers	N/A	Chambers-1-03	RE-13
Chambers-1	Thompson Chambers	N/A	Chambers-1-04	TR-1
Chambers-1	Thompson Chambers	N/A	Chambers-1-05	AL-8
Chase-1	Greg Chase	N/A	Chase-1-01	G-19
Chasnoff-1	Debra Chasnoff	N/A	Chasnoff-1-01	G-19
Child-1	Katrina Child	N/A	Child-1-01	PD-12
Chirico-1	John Chirico	N/A	Chirico-1-01	PD-6
Chirico-1	John Chirico	N/A	Chirico-1-02	AL-8
Cook-1	Elizabeth Cook	N/A	Cook-1-01	AL-9
Cook-1	Elizabeth Cook	N/A	Cook-1-02	PD-4
Cook-1	Elizabeth Cook	N/A	Cook-1-03	BI-13
Cook-1	Elizabeth Cook	N/A	Cook-1-04	BI-24
Cook-1	Elizabeth Cook	N/A	Cook-1-05	BI-21
Cook-1	Elizabeth Cook	N/A	Cook-1-06	PD-3
Cook-1	Elizabeth Cook	N/A	Cook-1-07	G-4
Corvan-1	Marianna Corvan	N/A	Corvan-1-01	G-19
Coxon-1	Michele Coxon	N/A	Coxon-1-01	AL-8
Creely-1	Elizabeth Creely	N/A	Creely-1-01	PD-1
Crouch-1	Dyer Crouch	N/A	Crouch-1-01	G-11
D'Antonio-1	Georgia D'Antonio	N/A	D'Antonio-1-01	G-19
Delacroix-1	Pierre Delacroix	N/A	Delacroix-1-01	AL-9
Delacroix-1	Pierre Delacroix	N/A	Delacroix-1-02	PD-4
Delacroix-1	Pierre Delacroix	N/A	Delacroix-1-03	BI-13
Delacroix-1	Pierre Delacroix	N/A	Delacroix-1-04	BI-21
Delacroix-1	Pierre Delacroix	N/A	Delacroix-1-05	BI-24
Delacroix-1	Pierre Delacroix	N/A	Delacroix-1-06	G-4
Demetrious-1	Amad Demetrious	N/A	Demetrious-1-01	AL-7
Demetrious-1	Amad Demetrious	N/A	Demetrious-1-02	G-19
Demetrious-1	Amad Demetrious	N/A	Demetrious-1-03	PD-23
Demetrious-1	Amad Demetrious	N/A	Demetrious-1-04	G-17
Devine-1	Deirdre Devine	N/A	Devine-1-01	G-19
DeWitt-1	Natalie DeWitt	N/A	DeWitt-1-01	G-19
DeWitt-1	Natalie DeWitt	N/A	DeWitt-1-02	AL-8
Donovan-1	Catherine Donovan	N/A	Donovan-1-01	PD-3
Donovan-1	Catherine Donovan	N/A	Donovan-1-02	G-25
Donovan-1	Catherine Donovan	N/A	Donovan-1-03	RE-13
Donovan-1	Catherine Donovan	N/A	Donovan-1-04	G-19
Dotz-1	Lawrence Dotz	N/A	Dotz-1-01	G-19
Dougherty-1	Mary Dougherty	N/A	Dougherty-1-01	G-25
Dougherty-1	Mary Dougherty	N/A	Dougherty-1-02	G-26
Dougherty-1	Mary Dougherty	N/A	Dougherty-1-03	RE-9

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Comment Letter No.	Commenter	Organization	Individual Comment No.	RTC Comment/Response No.
Dougherty-1	Mary Dougherty	N/A	Dougherty-1-04	G-26
Dougherty-1	Mary Dougherty	N/A	Dougherty-1-05	AL-8
Drechsler-1	Richared Drechsler	N/A	Drechsler-1-01	AL-8
Drechsler-1	Richared Drechsler	N/A	Drechsler-1-02	AL-5
Elkins-1	Tod Elkins	N/A	Elkins-1-01	PD-4
Elliott-1	Lisa Ruth Elliott	N/A	Elliott-1-01	PD-12
Emanuel-1	David Emanuel	N/A	Emanuel-1-01	AL-8
Emanuel-1	David Emanuel	N/A	Emanuel-1-02	G-19
Emanuel-1	David Emanuel	N/A	Emanuel-1-03	RE-3
Emanuel-1	David Emanuel	N/A	Emanuel-1-04	G-25
Emanuel-1	David Emanuel	N/A	Emanuel-1-05	G-21
Emanuel-2	David Emanuel	N/A	Emanuel-2-01	AL-8
Emanuel-2	David Emanuel	N/A	Emanuel-2-02	G-19
Emanuel-2	David Emanuel	N/A	Emanuel-2-03	RE-3
Emanuel-2	David Emanuel	N/A	Emanuel-2-04	G-25
Emanuel-2	David Emanuel	N/A	Emanuel-2-05	G-21
Enzi-1	Christopher Enzi	N/A	Enzi-1-01	PD-6
Enzi-1	Christopher Enzi	N/A	Enzi-1-02	G-26
Fasman-1	Michael Fasman	N/A	Fasman-1-01	AL-8
Fasman-1	Michael Fasman	N/A	Fasman-1-02	G-19
Fasman-1	Michael Fasman	N/A	Fasman-1-03	AL-8
Fitzer-1	Susan, Gene, and Wanda Fisher	N/A	Fitzer-1-01	G-15
Fitzer-1	Susan, Gene, and Wanda Fisher	N/A	Fitzer-1-02	RE-13
Fitzer-1	Susan, Gene, and Wanda Fisher	N/A	Fitzer-1-03	G-25
Fitzer-1	Susan, Gene, and Wanda Fisher	N/A	Fitzer-1-04	G-4
Fitzer-1	Susan, Gene, and Wanda Fisher	N/A	Fitzer-1-05	G-15
Fitzer-1	Susan, Gene, and Wanda Fisher	N/A	Fitzer-1-06	G-26
Flasher-1	Bob Flasher	N/A	Flasher-1-01	PD-1
Flasher-1	Bob Flasher	N/A	Flasher-1-02	PD-12
Fong-1	Edward Fong	N/A	Fong-1-01	AL-5
Form Letter-1	Various Commentors	N/A	Form Letter-1-01	G-25
Form Letter-1	Various Commentors	N/A	Form Letter-1-02	RE-13
Form Letter-1	Various Commentors	N/A	Form Letter-1-03	G-26
Form Letter-1	Various Commentors	N/A	Form Letter-1-04	RE-9
Form Letter-1	Various Commentors	N/A	Form Letter-1-05	AL-10
Form Letter-1	Douglas Acres	N/A	Form Letter-1-06	Comment noted; no response required
Form Letter-1	Spencer Arcieri	N/A	Form Letter-1-07	G-19
Form Letter-1	Nikki Azuma	N/A	Form Letter-1-08	G-19
Form Letter-1	Carol Bakker	N/A	Form Letter-1-09	Comment noted; no response required
Form Letter-1	Linda K. Barnes	N/A	Form Letter-1-10	PD-21
Form Letter-1	Robin Buckley	N/A	Form Letter-1-11	G-19
Form Letter-1	Terry Burkes	N/A	Form Letter-1-12	G-19
Form Letter-1	Lynette Castiglione	N/A	Form Letter-1-13	G-19
Form Letter-1	Amy Chow	N/A	Form Letter-1-14	G-19
Form Letter-1	Ivy Chu	N/A	Form Letter-1-15	G-19
Form Letter-1	Motley Jane Chusiso	N/A	Form Letter-1-16	Comment noted; no response required
Form Letter-1	Amy Clark	N/A	Form Letter-1-17	G-19

Attachment A: Responses by Commenter

Comment Letter No.	Commenter	Organization	Individual Comment No.	RTC Comment/Response No.
Form Letter-1	Michael Cohen	N/A	Form Letter-1-18	G-19
Form Letter-1	Gayle Donsky	N/A	Form Letter-1-19	RE-13
Form Letter-1	C DeBoer	N/A	Form Letter-1-20	Comment noted; no response required
Form Letter-1	Cindy Declorto	N/A	Form Letter-1-21	G-19
Form Letter-1	Corinne Dowling	N/A	Form Letter-1-22	AL-7
Form Letter-1	Jeff Faning	N/A	Form Letter-1-23	Comment noted; no response required
Form Letter-1	Joe P. Frey	N/A	Form Letter-1-24	PD-17
Form Letter-1	Jeannette Funcke	N/A	Form Letter-1-25	PD-21
Form Letter-1	Joell Hallowell	N/A	Form Letter-1-26	Comment noted; no response required
Form Letter-1	Arlene Handzel	N/A	Form Letter-1-27	Comment noted; no response required
Form Letter-1	Lee Heidhues	N/A	Form Letter-1-28	G-19
Form Letter-1	Mary Kennedy	N/A	Form Letter-1-29	Comment noted; no response required
Form Letter-1	Yuchun Ku	N/A	Form Letter-1-30	Comment noted; no response required
Form Letter-1	Gilian Ladd	N/A	Form Letter-1-31	G-19
Form Letter-1	Ricardo Lagos	N/A	Form Letter-1-32	G-19
Form Letter-1	Evelyn Lee	N/A	Form Letter-1-33	G-19
Form Letter-1	Jenny Leung	N/A	Form Letter-1-34	Comment noted; no response required
Form Letter-1	Triston McLaughlin	N/A	Form Letter-1-35	G-19
Form Letter-1	Sonja Ohldag	N/A	Form Letter-1-36	Comment noted; no response required
Form Letter-1	George E. Paphitis	N/A	Form Letter-1-37	G-19
Form Letter-1	Derek Park	N/A	Form Letter-1-38	G-19
Form Letter-1	Julianne Reidy	N/A	Form Letter-1-39	G-19
Form Letter-1	Judy Richardson	N/A	Form Letter-1-40	G-19
Form Letter-1	Maia Scott	N/A	Form Letter-1-41	Comment noted; no response required
Form Letter-1	Morley M. Singer	N/A	Form Letter-1-42	Comment noted; no response required
Form Letter-1	Tania Storti	N/A	Form Letter-1-43	Comment noted; no response required
Form Letter-1	Zoe Strauss	N/A	Form Letter-1-44	G-25
Form Letter-1	Teresa Swift	N/A	Form Letter-1-45	Comment noted; no response required
Form Letter-1	Natalie Tondelli	N/A	Form Letter-1-46	Comment noted; no response required
Form Letter-1	Ryan Tuozzolo	N/A	Form Letter-1-47	G-19
Form Letter-1	Sunny Walters	N/A	Form Letter-1-48	Comment noted; no response required
Form Letter-1	Sandra Waszak	N/A	Form Letter-1-49	G-19
Form Letter-1	Susan Wheeler	N/A	Form Letter-1-50	Comment noted; no response required
Form Letter-1	Shirley Wing	N/A	Form Letter-1-51	Comment noted; no response required

Attachment A: Responses by Commenter

Comment Letter No.	Commenter	Organization	Individual Comment No.	RTC Comment/Response No.
Form Letter-1	Christina Wong	N/A	Form Letter-1-52	G-19
Form Letter-1	Debbie Yuu	N/A	Form Letter-1-53	G-19
Fox-1	Camilla Fox	N/A	Fox-1-01	AL-9
Fox-1	Camilla Fox	N/A	Fox-1-02	PD-4
Fox-1	Camilla Fox	N/A	Fox-1-03	BI-13
Fox-1	Camilla Fox	N/A	Fox-1-04	BI-21
Fox-1	Camilla Fox	N/A	Fox-1-05	BI-24
Fox-1	Camilla Fox	N/A	Fox-1-06	G-4
Freedman-1	Aubrey Freedman	N/A	Freedman-1-01	PD-3
Freedman-1	Aubrey Freedman	N/A	Freedman-1-02	G-4
Furney-1	Gary Furney	N/A	Furney-1-01	PD-18
Gaar-1	Greg Gaar	N/A	Gaar-1-01	BI-15
Gaar-1	Greg Gaar	N/A	Gaar-1-02	PD-22
Gaar-1	Greg Gaar	N/A	Gaar-1-03	AL-4
Gaar-1	Greg Gaar	N/A	Gaar-1-04	AL-4
Gachowski-1	Michele Gachowski	N/A	Gachowski-1-01	G-19
Gachowski-1	Michele Gachowski	N/A	Gachowski-1-02	G-25
Garber-1	Ted Garber	N/A	Garber-1-01	BI-30
Garber-1	Ted Garber	N/A	Garber-1-02	PD-4
Garber-1	Ted Garber	N/A	Garber-1-03	BI-13
Garber-1	Ted Garber	N/A	Garber-1-04	RE-13
Garber-1	Ted Garber	N/A	Garber-1-05	G-25
Garbutt-1	Gerard Garbutt	N/A	Garbutt-1-01	G-20
Garnett-1	Elizabeth Garnett	N/A	Garnett-1-01	G-19
Gavin-1	Gregory Gavin	N/A	Gavin-1-01	G-25
Gerrie-1	Philip Gerrie	N/A	Gerrie-1-01	G-11
Gerrie-1	Philip Gerrie	N/A	Gerrie-1-02	PD-27
Gerrie-1	Philip Gerrie	N/A	Gerrie-1-03	AL-10
Gerrie-1	Philip Gerrie	N/A	Gerrie-1-04	AL-2
Ghosh-1	Samir Ghosh	N/A	Ghosh-1-01	PD-3
Ghosh-1	Samir Ghosh	N/A	Ghosh-1-02	G-25
Ghosh-1	Samir Ghosh	N/A	Ghosh-1-03	RE-13
Ghosh-1	Samir Ghosh	N/A	Ghosh-1-04	G-26
Ghosh-1	Samir Ghosh	N/A	Ghosh-1-05	RE-9
Ghosh-1	Samir Ghosh	N/A	Ghosh-1-06	AL-10
Gleichenhaus-1	Peter Gleichenhaus	N/A	Gleichenhaus-1-01	CP-1
Gleichenhaus-1	Peter Gleichenhaus	N/A	Gleichenhaus-1-02	PD-14
Glikshtern-1	Anastasia Glikshtern	N/A	Glikshtern-1-01	PD-3
Glikshtern-1	Anastasia Glikshtern	N/A	Glikshtern-1-02	AL-8
Gomez-1	Oswald Gomez and Carol Borden-Gomez	N/A	Gomez-1-01	PD-3
Gomez-1	Oswald Gomez and Carol Borden-Gomez	N/A	Gomez-1-02	GE-3
Gomez-1	Oswald Gomez and Carol Borden-Gomez	N/A	Gomez-1-03	G-10
Gomez-1	Oswald Gomez and Carol Borden-Gomez	N/A	Gomez-1-04	G-4
Gomez-1	Oswald Gomez and Carol Borden-Gomez	N/A	Gomez-1-05	G-12
Gomez-1	Oswald Gomez and Carol Borden-Gomez	N/A	Gomez-1-06	BI-33
Gordon-1	Kelly Gordon	N/A	Gordon-1-01	AL-8
Gordon-1	Kelly Gordon	N/A	Gordon-1-02	RE-13
Gottesman-1	Judith Gottesman	N/A	Gottesman-1-01	AL-8
Gravanis-1	Ruth Gravanis	N/A	Gravanis-1-01	AL-10
Gravanis-1	Ruth Gravanis	N/A	Gravanis-1-02	PD-12

Attachment A: Responses by Commenter

Comment Letter No.	Commenter	Organization	Individual Comment No.	RTC Comment/Response No.
Gravanis-1	Ruth Gravanis	N/A	Gravanis-1-03	BI-27
Gravanis-1	Ruth Gravanis	N/A	Gravanis-1-04	BI-27
Gravanis-1	Ruth Gravanis	N/A	Gravanis-1-05	BI-23
Gravanis-1	Ruth Gravanis	N/A	Gravanis-1-06	BI-23
Greenberg-1	Sharon Greenberg	N/A	Greenberg-1-01	G-19
Griggs-1	Michael Griggs	N/A	Griggs-1-01	G-16
Grim-1	Dema Grim	N/A	Grim-1-01	G-19
Haire-1	Janet Haire	N/A	Haire-1-01	PD-14
Hammer-1	Milo Hammer	N/A	Hammer-1-01	G-19
Hartnett-1	William E. Hartnett	N/A	Hartnett-1-01	G-19
Hasbrouck-1	Edward Hasbrouck	N/A	Hasbrouck-1-01	G-20
Hatch-1	Caroline Hatch	N/A	Hatch-1-01	PD-1
Hayes-1	Dylan, Veronica, Isa Hayes	N/A	Hayes-1-01	G-11
Hayes-1	Dylan, Veronica, Isa Hayes	N/A	Hayes-1-02	PP-1
Hecht-1	Alma Hecht	N/A	Hecht-1-01	BI-33
Hecht-1	Alma Hecht	N/A	Hecht-1-02	GG-1
Hecht-1	Alma Hecht	N/A	Hecht-1-03	AQ-1
Hecht-1	Alma Hecht	N/A	Hecht-1-04	PD-4
Heldman-1	Mary Heldman	N/A	Heldman-1-01	PD-3
Heldman-1	Mary Heldman	N/A	Heldman-1-02	PD-4
Heldman-1	Mary Heldman	N/A	Heldman-1-03	AL-8
Hershkowitz-1	Daniel Hershkowitz	N/A	Hershkowitz-1-01	G-19
Hess-1	Claire and David Hess, David Young, Helen and David Zisser	N/A	Hess-1-01	PD-20
Hess-1	Claire and David Hess, David Young, Helen and David Zisser	N/A	Hess-1-02	BI-24
Hess-1	Claire and David Hess, David Young, Helen and David Zisser	N/A	Hess-1-03	BI-20
Hess-1	Claire and David Hess, David Young, Helen and David Zisser	N/A	Hess-1-04	HZ-4
Hess-1	Claire and David Hess, David Young, Helen and David Zisser	N/A	Hess-1-05	AE-2
Hess-1	Claire and David Hess, David Young, Helen and David Zisser	N/A	Hess-1-06	HZ-1
Hess-1	Claire and David Hess, David Young, Helen and David Zisser	N/A	Hess-1-07	G-4
Hess-1	Claire and David Hess, David Young, Helen and David Zisser	N/A	Hess-1-08	PD-20
Hochschild-1	Frances Hochschild et al	N/A	Hochschild-1-01	G-19
Holzman-1	Barbara Holzman	N/A	Holzman-1-01	PD-1
Holzman-1	Barbara Holzman	N/A	Holzman-1-02	G-11
Holzman-1	Barbara Holzman	N/A	Holzman-1-03	G-11
Holzman-1	Barbara Holzman	N/A	Holzman-1-04	PD-1
Holzman-1	Barbara Holzman	N/A	Holzman-1-05	CP-3
Holzman-1	Barbara Holzman	N/A	Holzman-1-06	RE-4
Holzman-1	Barbara Holzman	N/A	Holzman-1-07	AL-4
Hooker-1	Steve Hooker	N/A	Hooker-1-01	AL-8
Hooker-1	Steve Hooker	N/A	Hooker-1-02	G-19
Hooker-1	Steve Hooker	N/A	Hooker-1-03	PD-3
Hooker-1	Steve Hooker	N/A	Hooker-1-04	AL-8
Horn-1	Margaret A. Horn	N/A	Horn-1-01	CP-1
Horn-1	Margaret A. Horn	N/A	Horn-1-02	PD-14
Hovland-1	Madeline Hovland	N/A	Hovland-1-01	PD-4
Hovland-1	Madeline Hovland	N/A	Hovland-1-02	HZ-4
Hu-1	Karen Hu	N/A	Hu-1-01	PD-3
Huebsch-1	Nina Huebsch	N/A	Huebsch-1-01	PD-7
Huebsch-1	Nina Huebsch	N/A	Huebsch-1-02	G-19
Hull-1	Prudence Hull	N/A	Hull-1-01	G-19

Attachment A: Responses by Commenter

Comment Letter No.	Commenter	Organization	Individual Comment No.	RTC Comment/Response No.
Hull-1	Prudence Hull	N/A	Hull-1-02	HZ-1
Hull-1	Prudence Hull	N/A	Hull-1-03	G-25
Illig-1	Jim Illig	N/A	Illig-1-01	PD-7
Ingle-1	Kay Ingle	N/A	Ingle-1-01	G-25
Ingram-1	Terry Ingram	N/A	Ingram-1-01	PD-3
Jake-1	Krist Jake	N/A	Jake-1-01	G-25
Jake-1	Krist Jake	N/A	Jake-1-02	G-19
Jake-1	Krist Jake	N/A	Jake-1-03	G-26
Jake-1	Krist Jake	N/A	Jake-1-04	PD-23
Jake-1	Krist Jake	N/A	Jake-1-05	G-26
Jake-1	Krist Jake	N/A	Jake-1-06	G-5
Jake-1	Krist Jake	N/A	Jake-1-07	RE-9
Jake-1	Krist Jake	N/A	Jake-1-08	RE-8
Jake-1	Krist Jake	N/A	Jake-1-09	AE-6
Jake-1	Krist Jake	N/A	Jake-1-10	GG-1
Jake-1	Krist Jake	N/A	Jake-1-11	GG-2
Johns-1	Belinda Johns	N/A	Johns-1-01	PD-3
Johns-1	Belinda Johns	N/A	Johns-1-02	G-10
Johns-1	Belinda Johns	N/A	Johns-1-03	HZ-1
Johns-1	Belinda Johns	N/A	Johns-1-04	BI-20
Johns-1	Belinda Johns	N/A	Johns-1-05	GE-3
Johns-1	Belinda Johns	N/A	Johns-1-06	GG-1
Johns-1	Belinda Johns	N/A	Johns-1-07	HZ-1
Johns-1	Belinda Johns	N/A	Johns-1-08	G-4
Johnson-1	Mandy Johnson	N/A	Johnson-1-01	PD-7
Johnson-1	Mandy Johnson	N/A	Johnson-1-02	PD-3
Johnston-1	Carolyn Johnston	N/A	Johnston-1-01	PD-20
Joyce-1	Ann Joyce	N/A	Joyce-1-01	G-20
Jungreis-1	Jason Jungreis	N/A	Jungreis-1-01	AL-9
Jungreis-1	Jason Jungreis	N/A	Jungreis-1-02	PD-4
Jungreis-1	Jason Jungreis	N/A	Jungreis-1-03	BI-13
Jungreis-1	Jason Jungreis	N/A	Jungreis-1-04	BI-24
Jungreis-1	Jason Jungreis	N/A	Jungreis-1-05	BI-21
Jungreis-1	Jason Jungreis	N/A	Jungreis-1-06	PD-3
Jungreis-1	Jason Jungreis	N/A	Jungreis-1-07	G-4
Kalafati-1	Anton Kalafati	N/A	Kalafati-1-01	PD-3
Kalafati-1	Anton Kalafati	N/A	Kalafati-1-02	AL-8
Karpa-1	Mike Karpa	N/A	Karpa-1-01	G-19
Kass-1	Sidney Kass	N/A	Kass-1-01	PD-1
Kathie-1	Kathie	N/A	Kathie-1-01	G-20
Keating-1	John B. Keating	N/A	Keating-1-01	PD-3
Keating-1	John B. Keating	N/A	Keating-1-02	BI-13
Keating-1	John B. Keating	N/A	Keating-1-03	G-12
Keats-1	Carma Keats	N/A	Keats-1-01	G-19
Keitelman-1	Mary Keitelman	N/A	Keitelman-1-01	CP-2
Keitelman-1	Mary Keitelman	N/A	Keitelman-1-02	PD-13
Kelly-1	Kimberly Kelly	N/A	Kelly-1-01	G-25
Kelly-1	Kimberly Kelly	N/A	Kelly-1-02	G-17
Kelly-1	Kimberly Kelly	N/A	Kelly-1-03	RE-13
Kelly-1	Kimberly Kelly	N/A	Kelly-1-04	TR-1

Attachment A: Responses by Commenter

Comment Letter No.	Commenter	Organization	Individual Comment No.	RTC Comment/Response No.
Kelly-1	Kimberly Kelly	N/A	Kelly-1-05	G-26
Kelly-1	Kimberly Kelly	N/A	Kelly-1-06	PD-23
Kelly-1	Kimberly Kelly	N/A	Kelly-1-07	GG-1
Kelly-1	Kimberly Kelly	N/A	Kelly-1-08	GG-2
Kenealy-1	Pat Kenealy	N/A	Kenealy-1-01	G-19
Kesel-1	Rachel Kesel	N/A	Kesel-1-01	G-11
Kesel-1	Rachel Kesel	N/A	Kesel-1-02	PD-1
Kessler-1	Janet Kessler	N/A	Kessler-1-01	G-12
Kessler-1	Janet Kessler	N/A	Kessler-1-02	BI-24
Kessler-1	Janet Kessler	N/A	Kessler-1-03	BI-13
Kessler-1	Janet Kessler	N/A	Kessler-1-04	HZ-1
Kessler-1	Janet Kessler	N/A	Kessler-1-05	HZ-1
Kessler-1	Janet Kessler	N/A	Kessler-1-06	HZ-1
Kessler-1	Janet Kessler	N/A	Kessler-1-07	HZ-1
Kessler-1	Janet Kessler	N/A	Kessler-1-08	HZ-1
Kessler-1	Janet Kessler	N/A	Kessler-1-09	G-3
Kessler-1	Janet Kessler	N/A	Kessler-1-10	BI-20
Kessler-1	Janet Kessler	N/A	Kessler-1-11	PD-3
Kessler-1	Janet Kessler	N/A	Kessler-1-12	PD-3
Kessler-1	Janet Kessler	N/A	Kessler-1-13	AL-8
Kessler-1	Janet Kessler	N/A	Kessler-1-14	AL-13
Kessler-1	Janet Kessler	N/A	Kessler-1-15	AL-10
Kessler-2	Janet Kessler	N/A	Kessler-2-01	G-12
Kessler-2	Janet Kessler	N/A	Kessler-2-02	BI-24
Kessler-2	Janet Kessler	N/A	Kessler-2-03	BI-13
Kessler-2	Janet Kessler	N/A	Kessler-2-04	HZ-1
Kessler-2	Janet Kessler	N/A	Kessler-2-05	HZ-1
Kessler-2	Janet Kessler	N/A	Kessler-2-06	HZ-1
Kessler-2	Janet Kessler	N/A	Kessler-2-07	HZ-1
Kessler-2	Janet Kessler	N/A	Kessler-2-08	HZ-1
Kessler-2	Janet Kessler	N/A	Kessler-2-09	G-3
Kessler-2	Janet Kessler	N/A	Kessler-2-10	BI-20
Kessler-2	Janet Kessler	N/A	Kessler-2-11	PD-3
Kessler-2	Janet Kessler	N/A	Kessler-2-12	PD-3
Kessler-2	Janet Kessler	N/A	Kessler-2-13	AL-8
Kessler-2	Janet Kessler	N/A	Kessler-2-14	AL-13
Kessler-2	Janet Kessler	N/A	Kessler-2-15	AL-10
Kind-1	Jean Kind	N/A	Kind-1-01	G-19
King-1	Julie King	N/A	King-1-01	G-25
Klebaner-1	Susanna Klebaner	N/A	Klebaner-1-01	PD-3
Klebaner-1	Susanna Klebaner	N/A	Klebaner-1-02	AL-8
Koster-1	Carolyn Koster	N/A	Koster-1-01	PD-3
Koury-1	Richard Koury	N/A	Koury-1-01	AL-9
Kovinsky-1	Matthew Kovinsky	N/A	Kovinsky-1-01	G-19
Kushner-1	Pinky Kushner	N/A	Kushner-1-01	G-11
Kushner-1	Pinky Kushner	N/A	Kushner-1-02	PD-12
Kushner-1	Pinky Kushner	N/A	Kushner-1-03	AL-10
Kushner-1	Pinky Kushner	N/A	Kushner-1-04	G-16
Kushner-1	Pinky Kushner	N/A	Kushner-1-05	AL-10
Kushner-1	Pinky Kushner	N/A	Kushner-1-06	BI-9

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Comment Letter No.	Commenter	Organization	Individual Comment No.	RTC Comment/Response No.
Kushner-1	Pinky Kushner	N/A	Kushner-1-07	AL-10
Langille-1	Celeste Langille	N/A	Langille-1-01	AL-3
Langille-1	Celeste Langille	N/A	Langille-1-02	PD-12
Langille-1	Celeste Langille	N/A	Langille-1-03	PD-1
Langille-1	Celeste Langille	N/A	Langille-1-04	G-11
Langille-1	Celeste Langille	N/A	Langille-1-05	BI-15
Langille-1	Celeste Langille	N/A	Langille-1-06	PD-27
Langille-1	Celeste Langille	N/A	Langille-1-07	AL-10
Langille-1	Celeste Langille	N/A	Langille-1-08	AL-2
Lansdown-1	Victoria Lansdown	N/A	Lansdown-1-01	PD-3
Lapins-1	Denise Lapins	N/A	Lapins-1-01	BI-33
Lapins-1	Denise Lapins	N/A	Lapins-1-02	BI-33
Lapins-1	Denise Lapins	N/A	Lapins-1-03	AL-5
Lapins-1	Denise Lapins	N/A	Lapins-1-04	AL-8
Lee-P-1	Pam Lee	N/A	Lee-P-1-01	G-19
Lee-Y-1	Yen L. Lee	N/A	Lee-Y-1-01	CP-1
Lendaro-1	Melody Lendaro	N/A	Lendaro-1-01	PD-3
Levins-1	Alan Levins	N/A	Levins-1-01	CP-1
Links-1	Bo Links	N/A	Links-1-01	CP-1
Links-2	Bo Links	N/A	Links-2-01	CP-1
Litehiser-1	Linda Litehiser	N/A	Litehiser-1-01	AL-8
Litehiser-1	Linda Litehiser	N/A	Litehiser-1-02	AL-7
Litehiser-1	Linda Litehiser	N/A	Litehiser-1-03	G-19
Litehiser-1	Linda Litehiser	N/A	Litehiser-1-04	G-5
Lock-1	Ken Lock	N/A	Lock-1-01	G-20
Loeffler-1	Joan Loeffler	N/A	Loeffler-1-01	PD-8
Lorenz-1	Henry Lorenz	N/A	Lorenz-1-01	AL-8
Lorenz-1	Henry Lorenz	N/A	Lorenz-1-02	G-4
Lorenz-1	Henry Lorenz	N/A	Lorenz-1-03	AE-4
Lorenz-1	Henry Lorenz	N/A	Lorenz-1-04	G-2
Louie-1	Denise Louie	N/A	Louie-1-01	PD-12
Lu-1	Kathy Lu	N/A	Lu-1-01	PD-4
Lundeen-1	Eddie Lundeen	N/A	Lundeen-1-01	G-19
Lynch-1	Paul Lynch	N/A	Lynch-1-01	G-19
Mace-1	Shannon Mace	N/A	Mace-1-01	G-25
Mace-1	Shannon Mace	N/A	Mace-1-02	AL-8
Madar-1	Jen Madar	N/A	Madar-1-01	G-19
Mansbach-1	Larry Mansbach	N/A	Mansbach-1-01	CP-1
Mansbach-1	Larry Mansbach	N/A	Mansbach-1-02	G-8
Mar-1	Glenn Mar	N/A	Mar-1-01	AL-8
Masud-1	Chuck Masud	N/A	Masud-1-01	G-20
Mattingly-1	Judith Mattingly	N/A	Mattingly-1-01	PD-4
Mattingly-1	Judith Mattingly	N/A	Mattingly-1-02	HZ-1
Mattingly-1	Judith Mattingly	N/A	Mattingly-1-03	PD-3
McAllister-1	Mary McAllister	N/A	McAllister-1-01	AL-10
McAllister-1	Mary McAllister	N/A	McAllister-1-02	G-9
McAllister-2	Mary McAllister	N/A	McAllister-2-01	HZ-4
McAllister-2	Mary McAllister	N/A	McAllister-2-02	HZ-4
McAllister-2	Mary McAllister	N/A	McAllister-2-03	BI-33
McAllister-3	Mary McAllister	N/A	McAllister-3-01	BI-33

Attachment A: Responses by Commenter

Comment Letter No.	Commenter	Organization	Individual Comment No.	RTC Comment/Response No.
McAllister-3	Mary McAllister	N/A	McAllister-3-02	BI-33
McAllister-3	Mary McAllister	N/A	McAllister-3-03	GG-1
McAllister-3	Mary McAllister	N/A	McAllister-3-04	HZ-1
McAllister-3	Mary McAllister	N/A	McAllister-3-05	HZ-1
McAllister-3	Mary McAllister	N/A	McAllister-3-06	HZ-1
McAllister-3	Mary McAllister	N/A	McAllister-3-07	HZ-1
McAllister-3	Mary McAllister	N/A	McAllister-3-08	AL-8
McAllister-3	Mary McAllister	N/A	McAllister-3-09	AL-10
McAllister-3	Mary McAllister	N/A	McAllister-3-10	G-10
McAllister-3	Mary McAllister	N/A	McAllister-3-11	G-10
McCalla-1	Kim McCalla	N/A	McCalla-1-01	G-19
McCalla-1	Kim McCalla	N/A	McCalla-1-02	PD-23
McGinnis-1	Paula McGinnis	N/A	McGinnis-1-01	TR-1
Miller-E-1	Eric Miller	N/A	Miller-E-1-01	PD-3
Miller-E-2	Eric Miller	N/A	Miller-E-2-01	G-10
Miller-J-1	Jennifer Miller	N/A	Miller-J-1-01	G-19
Miller-N-1	Norma Miller	N/A	Miller-N-1-01	G-19
Miller-N-2	Norma Miller	N/A	Miller-N-2-01	G-10
Mills-1	Claire Mills	N/A	Mills-1-01	PD-3
Mills-1	Claire Mills	N/A	Mills-1-02	G-25
Mills-1	Claire Mills	N/A	Mills-1-03	AL-8
Milstein-1	Prabha Milstein	N/A	Milstein-1-01	HZ-1
Miner-1	Laura Miner	N/A	Miner-1-01	AL-8
Minsuk-1	Sue Minsuk	N/A	Minsuk-1-01	AL-8
Minsuk-1	Sue Minsuk	N/A	Minsuk-1-02	G-19
Minsuk-1	Sue Minsuk	N/A	Minsuk-1-03	AL-8
Monagle-1	Patricia Monagle	N/A	Monagle-1-01	G-19
Moseley-1	Beth Moseley	N/A	Moseley-1-01	G-11
Moyer-1	Leigh Moyer	N/A	Moyer-1-01	G-25
Moyer-1	Leigh Moyer	N/A	Moyer-1-02	RE-13
Moyer-1	Leigh Moyer	N/A	Moyer-1-03	G-26
Moyer-1	Leigh Moyer	N/A	Moyer-1-04	RE-9
Moyer-1	Leigh Moyer	N/A	Moyer-1-05	AL-8
Mundy-1	Al Mundy	N/A	Mundy-1-01	G-19
Muniz-1	Laurel Muniz	N/A	Muniz-1-01	PD-7
Murphy-B-1	Bob Murphy	N/A	Murphy-B-1-01	PD-14
Murphy-D-1	Dan and Joan Murphy	N/A	Murphy-D-1-01	PD-1
Murphy-D-1	Dan and Joan Murphy	N/A	Murphy-D-1-02	AL-3
Nagle-1	Taylor Nagle	N/A	Nagle-1-01	PD-32
Naima-1	Reza Naima	N/A	Naima-1-01	PD-33
Naima-1	Reza Naima	N/A	Naima-1-02	PD-23
Naima-1	Reza Naima	N/A	Naima-1-03	G-17
Naima-1	Reza Naima	N/A	Naima-1-04	RE-13
Naima-1	Reza Naima	N/A	Naima-1-05	PD-34
Nelson-1	Tiffany Nelson	N/A	Nelson-1-01	G-25
Nelson-1	Tiffany Nelson	N/A	Nelson-1-02	G-26
Nelson-1	Tiffany Nelson	N/A	Nelson-1-03	RE-9
Nelson-1	Tiffany Nelson	N/A	Nelson-1-04	G-26
Nelson-1	Tiffany Nelson	N/A	Nelson-1-05	AL-7
Norton-1	Donald Norton	N/A	Norton-1-01	G-19

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Comment Letter No.	Commenter	Organization	Individual Comment No.	RTC Comment/Response No.
Norton-1	Donald Norton	N/A	Norton-1-02	AL-8
Oliva-1	Veronica Oliva	N/A	Oliva-1-01	PD-12
Olliphant-1	Hugh Olliphant	N/A	Olliphant-1-01	G-19
O'Neill-1	Elizabeth O'Neill	N/A	O'Neill-1-01	G-19
O'Neill-1	Elizabeth O'Neill	N/A	O'Neill-1-02	PD-3
Otto-1	Nancy Otto	N/A	Otto-1-01	HZ-1
Otto-1	Nancy Otto	N/A	Otto-1-02	HZ-1
Otto-1	Nancy Otto	N/A	Otto-1-03	HZ-1
Patillo-1	Chris Patillo	N/A	Patillo-1-01	CP-2
Perrins-1	Georgina Perrins	N/A	Perrins-1-01	AL-8
Perrins-1	Georgina Perrins	N/A	Perrins-1-02	G-19
Perry-A-1	Andrea and Arie Perry	N/A	Perry-A-1-01	PD-3
Perry-J-1	John Perry	N/A	Perry-J-1-01	G-19
Pfister-1	Charles Pfister	N/A	Pfister-1-01	PD-21
Pfister-1	Charles Pfister	N/A	Pfister-1-02	PD-13
Pfister-1	Charles Pfister	N/A	Pfister-1-03	PD12
Pfister-1	Charles Pfister	N/A	Pfister-1-04	PD-27
Pfister-1	Charles Pfister	N/A	Pfister-1-05	AL-10
Pfister-1	Charles Pfister	N/A	Pfister-1-06	AL-2
Pfister-1	Charles Pfister	N/A	Pfister-1-07	G-16
Pittin-1	Renee Pittin	N/A	Pittin-1-01	G-25
Pittin-1	Renee Pittin	N/A	Pittin-1-02	HZ-1
Pittin-1	Renee Pittin	N/A	Pittin-1-03	RE-3
Pittin-1	Renee Pittin	N/A	Pittin-1-04	AL-14
Popoff-1	Michael Popoff	N/A	Popoff-1-01	G-19
Popoff-1	Michael Popoff	N/A	Popoff-1-02	G-25
Popoff-1	Michael Popoff	N/A	Popoff-1-03	RE-13
Potts-1	Jason Potts	N/A	Potts-1-01	PD-4
Pruitt-1	Beth Pruitt	N/A	Pruitt-1-01	PD-6
Pruitt-1	Beth Pruitt	N/A	Pruitt-1-02	RE-9
Pruitt-1	Beth Pruitt	N/A	Pruitt-1-03	G-19
Pruitt-1	Beth Pruitt	N/A	Pruitt-1-04	AL-8
Quinn-1	Chris Quinn	N/A	Quinn-1-01	AL-8
Quinn-1	Chris Quinn	N/A	Quinn-1-02	G-19
Radetsky-1	Ruth Radetsky	N/A	Radetsky-1-01	G-20
Raffaelli-1	Paulo Rafaelli	N/A	Raffaelli-1-01	G-19
Raffaelli-1	Paulo Rafaelli	N/A	Raffaelli-1-02	AL-8
Rafferty-1	Patrick Rafferty	N/A	Rafferty-1-01	PD-1
Rafferty-1	Patrick Rafferty	N/A	Rafferty-1-02	G-11
Randt-1	Bill Randt	N/A	Randt-1-01	G-19
Ray-1	Jamie Ray	N/A	Ray-1-01	AL-1
Ray-1	Jamie Ray	N/A	Ray-1-02	PD-4
Ray-1	Jamie Ray	N/A	Ray-1-03	BI-13
Ray-1	Jamie Ray	N/A	Ray-1-04	BI-21
Ray-1	Jamie Ray	N/A	Ray-1-05	BI-24
Ray-1	Jamie Ray	N/A	Ray-1-06	G-4
Rehling-1	Lu Rehling	N/A	Rehling-1-01	G-12
Rehling-1	Lu Rehling	N/A	Rehling-1-02	G-10
Rehling-1	Lu Rehling	N/A	Rehling-1-03	G-4
Reichardt-1	Kathy Reichardt	N/A	Reichardt-1-01	AL-8

Attachment A: Responses by Commenter

Comment Letter No.	Commenter	Organization	Individual Comment No.	RTC Comment/Response No.
Reichardt-1	Kathy Reichardt	N/A	Reichardt-1-02	AL-10
Reichardt-1	Kathy Reichardt	N/A	Reichardt-1-03	HZ-1
Reque-1	Peter Reque	N/A	Reque-1-01	G-19
RileyHoppes-1	Donna Riley Hoppes	N/A	RileyHoppes-1-01	PD-7
Risk-1	Jane and Jerry Risk	N/A	Risk-1-01	G-10
Risk-1	Jane and Jerry Risk	N/A	Risk-1-02	PD-20
Risk-1	Jane and Jerry Risk	N/A	Risk-1-03	AL-6
Risk-1	Jane and Jerry Risk	N/A	Risk-1-04	WS-1
Risk-1	Jane and Jerry Risk	N/A	Risk-1-05	HZ-1
Risk-1	Jane and Jerry Risk	N/A	Risk-1-06	G-4
Risk-1	Jane and Jerry Risk	N/A	Risk-1-07	PD-3
Rodriguez-1	Marilyn Ines Rodriguez	N/A	Rodriguez-1-01	G-19
Rogers-1	Glenn Rogers	N/A	Rogers-1-01	PD-1
Rogers-1	Glenn Rogers	N/A	Rogers-1-02	PD-12
Roman-1	Jonathan Roman	N/A	Roman-1-01	G-19
Rosenthal-1	Nancy Rosenthal	N/A	Rosenthal-1-01	G-11
Rotter-E-1	Elizabeth Rotter	N/A	Rotter-E-1-01	AL-8
Rotter-E-1	Elizabeth Rotter	N/A	Rotter-E-1-02	BI-33
Rotter-E-1	Elizabeth Rotter	N/A	Rotter-E-1-03	BI-33
Rotter-E-1	Elizabeth Rotter	N/A	Rotter-E-1-04	AL-5
Rotter-P-1	Paul Rotter	N/A	Rotter-P-1-01	AL-8
Rotter-P-1	Paul Rotter	N/A	Rotter-P-1-02	PD-4
Rotter-P-1	Paul Rotter	N/A	Rotter-P-1-03	AL-13
Saino-1	Celia Saino	N/A	Saino-1-01	PD-23
Salamone-1	Lisa Salamone	N/A	Salamone-1-01	G-19
Saltzer-Lamb-1	Vicki Saltzer-Lamb	N/A	Saltzer-Lamb-1-01	AL-8
Schlund-1	Claus Schlund	N/A	Schlund-1-01	G-19
Schlund-1	Claus Schlund	N/A	Schlund-1-02	HZ-1
Schlund-1	Claus Schlund	N/A	Schlund-1-03	PD-3
Schlund-1	Claus Schlund	N/A	Schlund-1-04	G-4
Schmoll-1	Gisela Schmoll	N/A	Schmoll-1-01	PD-12
Scott-1	Joanne Scott	N/A	Scott-1-01	PD-3
Scott-1	Joanne Scott	N/A	Scott-1-02	PD-3
Scott-1	Joanne Scott	N/A	Scott-1-03	G-19
Scott-1	Joanne Scott	N/A	Scott-1-04	PD-3
Sebastian-1	Sandi Sebastian	N/A	Sebastian-1-01	G-19
Shapiro-1	Arthur Shapiro	N/A	Shapiro-1-01	PD-4
Sharp-1	Alisa Sharp	N/A	Sharp-1-01	G-19
Shepard-A-1	Avrum Shepard	N/A	Shepard-A-1-01	PD-11
Shepard-A-1	Avrum Shepard	N/A	Shepard-A-1-02	PD-3
Shepard-A-1	Avrum Shepard	N/A	Shepard-A-1-03	G-4
Shepard-A-1	Avrum Shepard	N/A	Shepard-A-1-04	G-10
Shepard-J-1	Jane Shepard	N/A	Shepard-J-1-01	G-25
Shepard-J-1	Jane Shepard	N/A	Shepard-J-1-02	PD-6
Simons-1	Kevin Simons	N/A	Simons-1-01	G-19
Skippy-1	Skippy	N/A	Skippy-1-01	G-19
Smith-1	Megan Smith	N/A	Smith-1-01	PD-6
Smith-1	Megan Smith	N/A	Smith-1-02	RE-13
Smith-1	Megan Smith	N/A	Smith-1-03	G-19
Stafford-1	Nancy Stafford	N/A	Stafford-1-01	AL-8

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Comment Letter No.	Commenter	Organization	Individual Comment No.	RTC Comment/Response No.
Stevenson-1	Jan Stevenson	N/A	Stevenson-1-01	G-19
Stewart-E-1	Ethan Stewart	N/A	Stewart-E-1-01	PD-4
Stewart-M-1	Matt Stewart	N/A	Stewart-M-1-01	G-19
Strasbaugh-1	Louise Strasbaugh	N/A	Strasbaugh-1-01	G-25
Stringer-1	Lew Stringer	N/A	Stringer-1-01	PD-12
Stringer-1	Lew Stringer	N/A	Stringer-1-02	BI-15
Stringer-1	Lew Stringer	N/A	Stringer-1-03	PD-27
Summer-1	William Summer	N/A	Summer-1-01	G-25
Summer-1	William Summer	N/A	Summer-1-02	RE-13
Sutch-1	Jeff Sutch	N/A	Sutch-1-01	G-19
Swenerton-1	Kirra Swenerton	N/A	Swenerton-1-01	PD-1
Swenerton-1	Kirra Swenerton	N/A	Swenerton-1-02	G-11
Swenerton-1	Kirra Swenerton	N/A	Swenerton-1-03	PD-27
Thayer-1	Nick Thayer	N/A	Thayer-1-01	PD-3
Thomas-1	Barbara Thomas	N/A	Thomas-1-01	HZ-1
Thomas-1	Barbara Thomas	N/A	Thomas-1-02	GE-3
Thomas-1	Barbara Thomas	N/A	Thomas-1-03	HY-1
Thomas-1	Barbara Thomas	N/A	Thomas-1-04	WS-2
Thomas-1	Barbara Thomas	N/A	Thomas-1-05	HZ-1
Thomas-1	Barbara Thomas	N/A	Thomas-1-06	GG-1
Thompson-C-1	Clare Thompson	N/A	Thompson-C-1-01	PD-3
Thompson-D-1	Doug Thompson	N/A	Thompson-D-1-01	PD-3
Tondelli-1	Natalie Tondelli	N/A	Tondelli-1-01	G-18
Tully-1	Sean Tully	N/A	Tully-1-01	CP-1
Valente-1	Suzanne M. Valente and Stephan R. Golub	N/A	Valente-1-01	AL-10
Valente-1	Suzanne M. Valente and Stephan R. Golub	N/A	Valente-1-02	HZ-1
Valente-1	Suzanne M. Valente and Stephan R. Golub	N/A	Valente-1-03	HZ-1
Valente-1	Suzanne M. Valente and Stephan R. Golub	N/A	Valente-1-04	HZ-3
Valente-1	Suzanne M. Valente and Stephan R. Golub	N/A	Valente-1-05	GE-3
Valente-1	Suzanne M. Valente and Stephan R. Golub	N/A	Valente-1-06	PD-4
Valente-1	Suzanne M. Valente and Stephan R. Golub	N/A	Valente-1-07	PD-6
Valente-1	Suzanne M. Valente and Stephan R. Golub	N/A	Valente-1-08	PD-14
Valente-1	Suzanne M. Valente and Stephan R. Golub	N/A	Valente-1-09	PD-3
Valente-1	Suzanne M. Valente and Stephan R. Golub	N/A	Valente-1-10	G-4
Valente-1	Suzanne M. Valente and Stephan R. Golub	N/A	Valente-1-11	AL-13
Valente-1	Suzanne M. Valente and Stephan R. Golub	N/A	Valente-1-12	PD-3
Valente-1	Suzanne M. Valente and Stephan R. Golub	N/A	Valente-1-13	AL-13
Vittori-1	Lisa Vittori	N/A	Vittori-1-01	G-10
Vitulano-1	Karen Vitulano	N/A	Vitulano-1-01	G-19
Vitulano-1	Karen Vitulano	N/A	Vitulano-1-02	RE-3
Vitulano-1	Karen Vitulano	N/A	Vitulano-1-03	PD-23
Vitulano-1	Karen Vitulano	N/A	Vitulano-1-04	G-17
Vitulano-1	Karen Vitulano	N/A	Vitulano-1-05	HZ-1
Von Erb-1	Jon Von Erb	N/A	Von Erb-1-01	G-19
Wade-1	Isabel Wade	N/A	Wade-1-01	BI-30
Wade-1	Isabel Wade	N/A	Wade-1-02	AE-1
Wade-1	Isabel Wade	N/A	Wade-1-03	G-4
Walker-1	Josh Walker	N/A	Walker-1-01	G-20
Weed-1	Thomas Weed	N/A	Weed-1-01	PD-12
Werger-1	Alison Werger	N/A	Werger-1-01	G-19

Attachment A: Responses by Commenter

Comment Letter No.	Commenter	Organization	Individual Comment No.	RTC Comment/Response No.
Wilford-1	Linda Wilford	N/A	Wilford-1-01	AL-8
Wilson-1	Bill Wilson	N/A	Wilson-1-01	G-11
Wilson-1	Bill Wilson	N/A	Wilson-1-02	BI-15
Wilson-1	Bill Wilson	N/A	Wilson-1-03	PD-27
Wilson-1	Bill Wilson	N/A	Wilson-1-04	AL-10
Wilson-1	Bill Wilson	N/A	Wilson-1-05	AL-2
Wilson-1	Bill Wilson	N/A	Wilson-1-06	PD-12
Winkquist-1	Kelly Winkquist	N/A	Winkquist-1-01	G-25
Winkquist-1	Kelly Winkquist	N/A	Winkquist-1-02	RE-13
Woo-1	Giny Woo	N/A	Woo-1-01	G-19
Yip-1	Yunny Yip	N/A	Yip-1-01	G-25
Yip-1	Yunny Yip	N/A	Yip-1-02	RE-13
Yip-1	Yunny Yip	N/A	Yip-1-03	G-26
Yip-1	Yunny Yip	N/A	Yip-1-04	RE-9
Yip-1	Yunny Yip	N/A	Yip-1-05	AL-10
Zeiger-1	Felicia Zeiger	N/A	Zeiger-1-01	PD-3
Zeiger-1	Felicia Zeiger	N/A	Zeiger-1-02	WS-1
Zendarski-1	Art Zendarski	N/A	Zendarski-1-01	G-19
PH-Stephens	Sally Stephens	N/A	PH-Stephens-01	AL-8
PH-Stephens	Sally Stephens	N/A	PH-Stephens-02	RE-1
PH-Stephens	Sally Stephens	N/A	PH-Stephens-03	G-25
PH-Stephens	Sally Stephens	N/A	PH-Stephens-04	G-26
PH-Stephens	Sally Stephens	N/A	PH-Stephens-05	G-26
PH-Stephens	Sally Stephens	N/A	PH-Stephens-06	RE-13
PH-Links	Bo Links	N/A	PH-Links-01	CP-1
PH-Links	Bo Links	N/A	PH-Links-02	G-8
PH-Pittin	Renee Pittin	N/A	PH-Pittin-01	G-19
PH-Shaffer	Linda Shaffer	N/A	Comments noted	No response required
PH-Sherap	Tenzin Sherap	N/A	PH-Sherap-01	PD-14
PH-Mozingo	George Mozingo	N/A	PH-Mozingo-01	PD-1
PH-Mozingo	George Mozingo	N/A	PH-Mozingo-02	CP-1
PH-Skain	Pat Skain	N/A	PH-Skain-01	PD-1
PH-Skain	Pat Skain	N/A	PH-Skain-02	G-11
PH-Bryant	Clarence Bryant	N/A	PH-Bryant-01	CP-1
PH-Rotter-P	Paul Rotter	N/A	PH-Rotter-P-01	AL-8
PH-Rotter-P	Paul Rotter	N/A	PH-Rotter-P-02	AL-12
PH-Rotter-P	Paul Rotter	N/A	PH-Rotter-P-03	HZ-1
PH-Rotter-P	Paul Rotter	N/A	PH-Rotter-P-04	AL-8
PH-Rotter-P	Paul Rotter	N/A	PH-Rotter-P-05	PD-3
PH-Rotter-N	Neaf Rotter	N/A	PH-Rotter-N-01	AL-8
PH-Bowman	Armita Bowman	N/A	PH-Bowman-01	BI-31
PH-Bowman	Armita Bowman	N/A	PH-Bowman-02	RE-9
PH-Gaar	Greg Gaar	N/A	PH-Gaar-01	BI-27
PH-Gaar	Greg Gaar	N/A	PH-Gaar-02	PD-1
PH-Brastow	Peter Brastow	N/A	PH-Brastow-01	PD-1
PH-Brastow	Peter Brastow	N/A	PH-Brastow-02	AL-10
PH-Brastow	Peter Brastow	N/A	PH-Brastow-03	AL-2
PH-Brastow	Peter Brastow	N/A	PH-Brastow-04	AL-3
PH-Keating	John Keating	N/A	PH-Keating-01	G-12

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Comment Letter No.	Commenter	Organization	Individual Comment No.	RTC Comment/Response No.
PH-Harris	Richard Harris	N/A	PH-Harris-01	G-8
PH-Noetzel	Steven Noetzel	N/A	PH-Noetzel-01	RE-13
PH-Emanuel	David Emanuel	N/A	PH-Emanuel-01	AL-7
PH-Solomon	Mark Solomon	N/A	PH-Solomon-01	PD-13
PH-Antonini	Michael Antonini	N/A	PH-Antonini-01	PD-1
PH-Antonini	Michael Antonini	N/A	PH-Antonini-02	BI-24
PH-Antonini	Michael Antonini	N/A	PH-Antonini-03	PD-5
PH-Antonini	Michael Antonini	N/A	PH-Antonini-04	BI-24
PH-Antonini	Michael Antonini	N/A	PH-Antonini-05	PD-14
PH-Antonini	Michael Antonini	N/A	PH-Antonini-06	RE-6
PH-Antonini	Michael Antonini	N/A	PH-Antonini-07	RE-5

Attachment B Draft EIR Comment Letters

NPS-1



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)

OCT 31 2011

Mr. Bill Wycko
San Francisco Planning Department
Natural Areas Management Plan Draft EIR
1650 Mission Street, Suite 400
San Francisco, CA 94103

Re: Natural Areas Management Plan Draft Environmental Impact Report

Dear Mr. Wycko:

Golden Gate National Recreation Area (GGNRA) has reviewed San Francisco Recreation and Park Department's (RPD) Natural Areas Management Plan Draft Environmental Impact Report (DEIR). The National Park Service (NPS) has interest in this management plan because changes are proposed for areas that lie adjacent to lands managed by GGNRA, and these changes may result in effects or impacts to GGNRA land.

In 2006 GGNRA submitted scoping comments on this plan that mostly focused on Sharp Park and Laguna Salada. We appreciate the Plan incorporating most of our suggestions. Since 2006, the park has released a Dog Management Plan Draft EIS, and completed major restoration projects at Mori Point with ongoing restoration stewardship efforts at this site. In this regard, your management actions at the Sharp Park natural area are of great interest to the NPS, as this natural area is within GGNRA's legislative boundary.

Also, reflected in our attached comments are concerns regarding Dog Play Areas (DPA's). RPD expressed many concerns regarding GGNRA's Draft Dog Management Plan and how the plan may affect DPA's. Given RPD's interest and concerns, we would have welcomed collaborative discussions during development of the DEIR regarding this area of mutual concern.

Thank you for the opportunity to comment. We encourage RPD to closely coordinate activities on natural areas that are adjacent to NPS lands as the plan moves towards completion and adoption. If you have questions or further clarification regarding our comments please contact GGNRA Planning Division Chief Nancy Hornor at (415) 561-4937.

Sincerely,

Frank Dean
General Superintendent

Enclosures (1): GGNRA Comments on RPD Significant Natural Areas Management Plan DEIR

NPS-1

*GGNRA Comments on SNRAMP DEIR (Aug. 2011)***GGNRA Comments on San Francisco's Significant Natural Areas Management Plan****General Comments**

- 01 { Plan Objectives (pg. 84): We suggest adding an objective that the RPD will coordinate management actions with adjacent open space managers so that habitat restoration work can be maximized over a larger area.
- 02 { Maximum Recreation Alternative (pg. 498): Please clarify the sentence under "Recreation": "However, under this alternative, Natural Areas Program staff would continue routine maintenance, which would ensure that the physical deterioration of recreation facilities (trails, DPAs, and other facilities) would not be substantially degraded." Erosion Control - Mitigation measures should include a requirement that erosion control materials be certified weed free, and when possible, certified wheat free. We also suggest that any erosion and sedimentation control materials, such as wattles, not be made of anything but natural fiber. We suggest that plastic mono-filament or biodegradable plastics not be used for erosion control where frogs or snakes may become entangled or trapped in it.
- 03 {

Dog Play Areas (DPAs)

- 04 { • Pg. 33, 301: It would be helpful to provide further details on what the process would be to document adverse affects in DPA's and what the order of steps would be to address impacts, especially prior to a decision to discontinue a DPA. n.
- 05 { Pg. 105, 110, 262: Further explanation is needed as to why no more DPAs may be planned. Since direction on this point dates to 2006, we suggest that this decision be revisited within RPD areas especially given SF concerns regarding impacts on existing SF DPAs due to GGNRA draft dog management plan. Proposed reductions in SF DPAs could increase pressure and impact on remaining dog areas.
- 06 { Lake Merced DPA (pg. 136, 305-306): It would be helpful to our dog management planning for NPS to receive the report of data gathered (# of dogs/incidences of disturbance) on disturbance to breeding birds at Lake Merced DPA that led to the proposal to close this DPA.
- 07 { Pg. 252: We would appreciate receiving any user data collected in preparation of this draft EIR that underlies the statement that the natural areas support a "substantial amount of outdoor recreation". The City submitted comments on the GGNRA Dog Management Plan/DEIS asking that we consider the re-distributional effects of closing areas, and noted that the City would provide visitor information to this effect. User data that documents the number of visitors (and dog walkers) currently using these areas will help us address this comment. Pg. 262, 346, 440 - Has any data been gathered to support the impacts on other DPAs and adjacent lands due to the proposed reductions of DPAs, together with the actions proposed in the draft GGNRA Dog Management Plan? If so, it would be helpful to share this information with GGNRA.
- 08 {
- 09 { 4 Lake Merced DPA (pg. 443): GGNRA would appreciate receiving any Lake Merced DPA visitor use data, referenced in the summary of increase in traffic being "minimal" as a result of this DPA closure.
- 10 { General Comment (pg. 443): Please correct description of acreage open to dog walking at Funston; 200 acres is not a correct figure. Please contact Shirwin Smith of my staff at 561-4947 for a correct acreage figure.
- 08 (Cont) { Pg.'s 470, 484, 498: GGNRA would appreciate receiving any data that documents how implementation of the GGNRA Dog Management Plan would result in significant and unavoidable impacts from deterioration of the DPAs.

NPS-1

GGNRA Comments on SNRAMP DEIR (Aug. 2011)

- 11 [General Comment: GGNRA is instituting a survey this fall to evaluate potential for redistribution onto other areas both within and outside the park resulting from implementation of the dog management plan and will share that those survey results with RPD.

Sharp Park

- 12 [General Comment : We are unable to find any information in the DEIR as to how management of the golf course regarding threatened and endangered species is linked with what is proposed in the document (e.g., mowing).
- 13 [General Comment : We are pleased to see that signage, in addition to fencing, is being recommended to protect sensitive wetlands.
- 14 [General Comment (Laguna Salada): We suggest that the plan clearly identify a long-term, sustainable solution of wetland protection and restoration that addresses rising salinity, sustainability of the seawall, and the issues associated with the pumping.
- 15 [General Description (pg. 143): There is a statement that makes reference to the Mori Point site being recently acquired. The property was acquired by the NPS in 2004 and has undergone major restoration efforts, including efforts to enhance habitat for the San Francisco Garter Snake and California Red-Legged Frog.
- 16 [Sharp Park Restoration (pg. 103): We suggest changing the language on the following statement: "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, re-contoured, and hydro-seeded with native vegetation to approximate their pre-disturbance condition." We recommend changing the language to state "those staging and storage areas that are not permanently modified (or identified as staging areas for near-future approved projects) would be scarified..." It doesn't seem appropriate to commit resources re-vegetating an area that will be disturbed in the following project season.
- 17 [SP-3a Recommended Management Action (pg. 144): We recommend this management action be applied based on vegetation type. For example, branches/logs that are contaminated with some invasive species (such as invaded with ripe seeds, cape ivy, untreated [chemically] eucalyptus trees, etc.) should not be retained.
- 18 [SP-4b Recommended Management Action (pg. 145): We suggest maintaining low vegetation in these upland mounds to allow for sufficient sun exposure, possibly by including some boulders or similar substrate that wouldn't support vegetation growth.
- 19 [SP-8a Recommended Management Action (pg. 145): We recommend including language about working with golf course staff to reduce chemical (fertilizer/herbicide) use to the minimum required and to use chemicals appropriate for areas adjacent to endangered species habitat.

CCC-1

Bock, John

From: Jessica.Range@sfgov.org
Sent: Wednesday, November 16, 2011 3:14 PM
To: Bock, John; Sarah.B.Jones@sfgov.org; Lisa.Wayne@sfgov.org; Lisa.Beyer@sfgov.org; Karen.Mauney-Brodek@sfgov.org
Subject: Fw: Comments DEIR SF Natural Resource Areas Management

Jessica Range, LEED AP
San Francisco Planning Department
Environmental Planning
1650 Mission Street, Suite 400
San Francisco, CA 94103
Phone: (415) 575-9018 / Fax: (415) 558-6409 www.sfplanning.org

----- Forwarded by Jessica Range/CTYPLN/SFGOV on 11/16/2011 03:14 PM -----

"Renee Ananda"
<rananda@coastal.ca.gov>
To
<jessica.range@sfgov.org>
11/16/2011 02:57 PM cc
Subject
Comments DEIR SF Natural Resource
Areas Management

Dear Ms. Range (Jessica),

Thank you for the opportunity to provide you with comments on the Draft EIR for the City of San Francisco's Significant Natural Resource Areas Management Plan. We understand that this CEQA document is programmatic. It does, however, contain a project-specific analysis for the proposed restoration of Sharp Park in Pacifica. I've also included a comment regarding Lake Merced.

SHARP PARK

Sharp Park is located within the Coastal Zone and the proposed restoration is located within an area under the Coastal Commission's (Commission) retained jurisdiction. A Coastal Development Permit (CDP), therefore, would be required from the Commission in order to implement the proposed restoration project. Please note that the comments below are preliminary and that Commission staff expects to conduct a more in-depth review/evaluation of the proposed project as part of the CDP application process.

CCC-1

- 01 { Dredging of wetlands where there is no feasible, less environmentally-damaging alternative and where feasible mitigation measures have been provided to minimize adverse environmental effects is permitted for restoration purposes, pursuant to Section 30233 of the Coastal Act.
The City will need to provide supporting analysis/evidence and documentation that the City's proposal is indeed the least environmentally-damaging alternative for restoration of the site.
- 02 { Proposed project activities, from the perspective of the Coastal Act, should not result in the filling of wetlands, as defined under the Section 30121 of the Coastal Act, or mowing of wetland vegetation. Additionally, there should not be significant modifications of wetland hydrology. The City will be required to ensure that all wetlands are correctly delineated according to Coastal Act Section 30121 and Section 13577 of the Administrative Regulations. Potential impacts to wetlands and other significant coastal resources must be clearly identified along with appropriate measures to mitigate those impacts.
- 03 { The City's environmental impact review should include data and analyses of coastal resource impacts associated with: a) sediment and water quality; b) wetland hydrology; and c) de-watering activities. Impacts should be evaluated for all phases of the proposed project, i.e., during construction and after construction. This information, additionally, will be needed for evaluation of the City's CDP application.
- 04 { LAKE MERCED
Lake Merced is located within the Coastal Zone. The DEIR correctly identifies the City of San Francisco as the agency responsible for issuing a CDP for any projects located within 100 feet of the lake. It should be additionally noted that the City's final action on a CDP is appealable to the Coastal Commission. Additionally, the open waters of the lake are under the retained jurisdiction of the Coastal Commission. Any proposal that involves that area requires a CDP from the Commission.

Please feel free to contact me if you have questions regarding these comments. I can be contacted at rananda@coastal.ca.gov or by phone at 415-904-5267.

Sincerely,
Renée Ananda, Coastal Program Analyst

=====

The Planning Department will have reduced services available the day before Thanksgiving and will be closed during the regularly observed legal holidays Thursday & Friday November 24-25, 2011. On Wednesday November 23rd only the Planning Information Center (PIC), located on the 1st floor of 1660 Mission Street, will be open for normal business hours.

Please note that the PIC will have reduced staffing on this day. The PIC phone number is (415) 558-6377. The Planning Department will resume full services on November 28, 2011.

=====

NAHC-1

STATE OF CALIFORNIA

Edmund G. Brown Jr., Governor

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-4082
(916) 657-5390 - Fax



RECEIVED

September 7, 2011

SEP 09 2011

Jessica Range
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M.E.A.

RE: SCH# 2009042102 Natural Areas Management Plan; San Francisco/San Mateo Counties

Dear Ms. Range:

The Native American Heritage Commission (NAHC) has reviewed the Notice of Completion (NOC) referenced above. The California Environmental Quality Act (CEQA) states that any project that causes a substantial adverse change in the significance of an historical resource, which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA Guidelines 15064(b)). To comply with this provision the lead agency is required to assess whether the project will have an adverse impact on historical resources within the area of project effect (APE), and if so to mitigate that effect. To adequately assess and mitigate project-related impacts to archaeological resources, the NAHC recommends the following actions:

- ✓ Contact the appropriate regional archaeological information center for a record search. The record search will determine:
 - If a part or all of the area of project effect (APE) has been previously surveyed for cultural resources.
 - If any known cultural resources have already been recorded on or adjacent to the APE.
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - If a survey is required to determine whether previously unrecorded cultural resources are present.
- ✓ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
 - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological information center.
- ✓ Contact the Native American Heritage Commission for:
 - A Sacred Lands File Check. USGS 7.5 minute quadrangle name, township, range and section required.
 - A list of appropriate Native American contacts for consultation concerning the project site and to assist in the mitigation measures. Native American Contacts List attached.
- ✓ Lack of surface evidence of archeological resources does not preclude their subsurface existence.
 - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
 - Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.
 - Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,

Katy Sanchez
Program Analyst
(916) 653-4040

cc: State Clearinghouse

NAHC-1

Native American Contact List
San Francisco and San Mateo Counties
September 7, 2011

Indian Canyon Mutsun Band of Costanoan
Ann Marie Sayers, Chairperson
P.O. Box 28 Ohlone/Costanoan
Hollister , CA 95024
ams@indiancanyon.org
831-637-4238

Amah/Mutsun Tribal Band
Joseph Mondragon, Tribal Administrator
882 Bay view Avenue Ohlone/Costanoan
Pacific Grove, CA 94062
831-372-9015
831-372-7078 - fax

Jakki Kehl
720 North 2nd Street Ohlone/Costanoan
Patterson , CA 95363
jakki@bigvalley.net
(209) 892-1060

Amah/Mutsun Tribal Band
Melvin Ketchum III, Environmental Coordinator
7273 Rosanna Street Ohlone/Costanoan
Gilroy , CA 95020
408-842-3220

Trina Marine Ruano Family
Ramona Garibay, Representative
30940 Watkins Street Ohlone/Costanoan
Union City , CA 94587 Bay Miwok
soaprootmo@msn.com Plains Miwok
510-972-0645-home Patwin
209-688-4753-cell

Muwekma Ohlone Indian Tribe of the SF Bay Area
Rosemary Cambra, Chairperson
2574 Seaboard Avenue Ohlone / Costanoan
San Jose , CA 95131
muwekma@muwekma.org
408-205-9714
510-581-5194

Amah/Mutsun Tribal Band
Irene Zwierlein, Chairperson
789 Canada Road Ohlone/Costanoan
Woodside , CA 94062
amah_mutsun@yahoo.com
(650) 851-7747 - Home
(650) 851-7489 - Fax

Amah/Mutsun Tribal Band
Jean-Marie Feyling
19350 Hunter Court Ohlone/Costanoan
Redding , CA 96003
jmfgmc@sbcglobal.net
530-243-1633

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH# 2009042102 Natural Areas Management Plan; San Francisco/San Mateo Counties.

NAHC-1

Native American Contact List
San Francisco and San Mateo Counties
September 7, 2011

The Ohlone Indian Tribe
Andrew Galvan
PO Box 3152
Fremont, CA 94539
chochenyo@AOL.com
(510) 882-0527 - Cell
(510) 687-9393 - Fax

Ohlone/Costanoan
Bay Miwok
Plains Miwok
Patwin

Linda G. Yamane
1585 Mira Mar Ave
Seaside, CA 93955
rumsien123@yahoo.com
831-394-5915

Ohlone/Costanoan

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH# 2009042102 Natural Areas Management Plan; San Francisco/San Mateo Counties.

OPR-1



Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit

RECEIVED



Ken Alex
Director

October 18, 2011

OCT 17 2011

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M.F.A.

Jessica Range
City and County of San Francisco, Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

Subject: Natural Areas Management Plan
SCH#: 2009042102

Dear Jessica Range:

01

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on October 17, 2011, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

01
(Cont.)

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures

cc: Resources Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

OPR-1

Document Details Report State Clearinghouse Data Base

SCH# 2009042102
Project Title Natural Areas Management Plan
Lead Agency San Francisco, City and County of

Type	EIR Draft EIR
Description	The San Francisco Recreation and Park Department developed a Significant Natural Resource Areas Management Plan to guide the management activities of the Natural Areas Program. The Natural Areas Program was created to protect and manage Natural Areas (fragments of unique plant and animal habitats) for the natural and human values they provide. The plan 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 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. The proposed project is implementation of the plan.

Lead Agency Contact

Name	Jessica Range		
Agency	City and County of San Francisco, Planning Department		
Phone	(415) 575-9018	Fax	
email			
Address	1650 Mission Street, Suite 400		
City	San Francisco	State	CA Zip 94103

Project Location

County	San Francisco, San Mateo
City	San Francisco, Pacifica
Region	
Lat / Long	
Cross Streets	
Parcel No.	
Township	

Range	Section	Base
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Proximity to:

Highways	Hwy 1
Airports	
Railways	
Waterways	San Francisco Bay, Pacific Ocean, Laguna Salada, etc.
Schools	numerous
Land Use	Land use is recreational, sites designated as open space and/or public.

Project Issues	Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Coastal Zone; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Recreation/Parks; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects
-----------------------	--

Reviewing Agencies	Resources Agency; California Coastal Commission; Department of Fish and Game, Region 3; Office of Historic Preservation; Department of Parks and Recreation; San Francisco Bay Conservation and Development Commission; Department of Water Resources; California Highway Patrol; Caltrans, District 4; Regional Water Quality Control Board, Region 2; Department of Toxic Substances Control; Native American Heritage Commission
---------------------------	---

Date Received	09/01/2011	Start of Review	09/01/2011	End of Review	10/17/2011
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Note: Blanks in data fields result from insufficient information provided by lead agency.

OPR-1

STATE OF CALIFORNIA

Edmund G. Brown Jr., Governor

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-4082
(916) 657-5390 - Fax



September 7, 2011

Jessica Range
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

01222
10/17/11
P



RE: SCH# 2009042102 Natural Areas Management Plan; San Francisco/San Mateo Counties

Dear Ms. Range:

The Native American Heritage Commission (NAHC) has reviewed the Notice of Completion (NOC) referenced above. The California Environmental Quality Act (CEQA) states that any project that causes a substantial adverse change in the significance of an historical resource, which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA Guidelines 15064(b)). To comply with this provision the lead agency is required to assess whether the project will have an adverse impact on historical resources within the area of project effect (APE), and if so to mitigate that effect. To adequately assess and mitigate project-related impacts to archaeological resources, the NAHC recommends the following actions:

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 - A Sacred Lands File Check. USGS 7.5 minute quadrangle name, township, range and section required.
 - A list of appropriate Native American contacts for consultation concerning the project site and to assist in the mitigation measures. Native American Contacts List attached.
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 - Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,

Katy Sanchez
Program Analyst
(916) 653-4040

cc: State Clearinghouse

BAAQMD-1



Jeanie Poling/CTYPLN/SFGOV

10/20/2011 11:10 AM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject: Fw: SNRAMP

History:

📧 This message has been forwarded.

----- Forwarded by Jeanie Poling/CTYPLN/SFGOV on 10/20/2011 11:12 AM -----



Christine Holmes
<cholmes@baaqmd.gov>

10/17/2011 11:41 AM

To: "jeanie.poling@sfgov.org" <jeanie.poling@sfgov.org>

cc

Subject: SNRAMP

Dear City/County of SF,

01

I would like to voice my strong support for the Significant Natural Resource Areas Management Plan. Pollution, habitat loss and fragmentation, and invasive species all make it difficult for native plants and animals to survive in the city. The remaining remnants of grasslands, coast scrub, oak woodlands, riparian areas, and salt marshes in natural areas throughout San Francisco must be maintained and expanded in order to preserve the bio-diversity which is San Francisco's most important natural element.

Thank you,

Christine Holmes
Bay Area Air Quality Management District
Human Resources Analyst | Human Resources Office
939 Ellis Street | San Francisco, CA 94109
Office: 415.749.4938 | Fax: 415.749.4992
cholmes@baaqmd.gov | www.baaqmd.gov

City of Pacifica-1



Scenic Pacifica

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
TEL (650) 738-7301
FAX (650) 359-6038
FINANCE
TEL (650) 738-7392
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
PLANNING
TEL (650) 738-7341
FAX (650) 359-5807
• Building
TEL (650) 738-7344
• Code Enforcement
TEL (650) 738-7341
POLICE DEPARTMENT
TEL (650) 738-7314
FAX (650) 355-1172
PUBLIC WORKS
TEL (650) 738-3760
FAX (650) 738-9747
• Engineering
TEL (650) 738-3767
FAX (650) 738-3003
• Field Services
TEL (650) 738-3760
FAX (650) 738-9747

01

CITY HALL

170 Santa Maria Avenue • Pacifica, California 94044-2506

www.cityofpacifica.org

MAYOR
Mary Ann Nihart

MAYOR PRO TEM
Peter DeJarnatt

COUNCIL
Sue Digre
James M. Vreeland, Jr.
Len Stone

RECEIVED

OCT 28 2011

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M E A

October 26, 2011

Bill Wycko, Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103-2479

RE: DEIR for SNRAMP Project (2005.1912E)

Dear Mr. Wycko:

This comment letter on the Environmental Report for the Significant Natural Resource Areas Management Plan is submitted on behalf of the City of Pacifica. One of the natural areas covered by the report is Sharp Park which is located in the City of Pacifica.

The City was asked by concerned residents to comment on the City/County of San Francisco's Draft Environmental Impact Report (DEIR) for the Significant Natural Resource Areas Management Plan (SNRAMP) which includes Sharp Park. The request came from those who have a concern about the impact of tree removal on drainage and the potential increase in mosquitoes due to increased size of the lagoon. These items are part of the SNRAMP that will be implemented at Sharp Park.

Based on staff research the City Council determined that the report addressed the concerns raised and that the concerns will be alleviated by the actions proposed to be included as a part of the SNRAMP. The City of Pacifica appreciates the work that San Francisco put into the DEIR, particularly in addressing the concerns that had been raised regarding management plan work proposed for Sharp Park.

Pacifica considers Sharp Park an important part of the community and believes that its natural areas and golf course are a part of what make Pacifica a pleasant community in which to live and recreate. We support the City of San Francisco's efforts to develop a plan to manage this most important resource for both communities.

Path of Portola 1769 • San Francisco Bay Discovery Site

City of Pacifica-1

Comment letter to Bill Wycko re DEIR for SNRAMP
October 26, 2011
Page 2

The City of Pacifica will continue to be a partner with San Francisco in moving forward the work called for in the Significant Natural Resource Areas Management Plan and in the preservation of the Sharp Park Golf Course. This is an important resource that is shared by the two cities as well as the rest of San Mateo County.

Thank you for the opportunity to comment on the Draft Environmental Impact Report for the Significant Natural Resource Areas Management Plan.

Sincerely,

A handwritten signature in black ink, appearing to read "Mary Ann Nihart". The signature is fluid and cursive, with the first name "Mary" and last name "Nihart" clearly distinguishable.

Mary Ann Nihart
Mayor

HPC-1



SAN FRANCISCO PLANNING DEPARTMENT

September 26, 2011

Mr. Bill Wycko
Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, 4th Floor
San Francisco, CA 94103

1650 Mission St.
Suite 400
San Francisco,
CA 94103-2479

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

Dear Mr. Wycko,

On September 21, 2011, the Historic Preservation Commission (HPC) held a public hearing and took public comment on the Draft Environmental Impact Report (DEIR) for the proposed Significant Natural Resources Area Management Plan. After discussion, the HPC arrived at the comments below:

- 01 { • The HPC did not have consensus on the historical integrity of the Sharp Park Golf Course. Some commissioners thought that the property does not retain sufficient integrity to convey the property's historical significance per the National Register of Historic Places and/or California Register of Historical Resources, while others thought that the property does retain sufficient integrity.
- 02 { • The HPC suggest that the mitigation measure described in M-CP-1 (Page 11) should be modified to specify that the future historic resource evaluations should be completed by a qualified professional landscape architectural historian.
- 03 { • The HPC suggests that the mitigation measure described in M-CP-7 (Page 13) should be modified to specify that a qualified professional landscape architectural historian should be retained to document the cultural landscape.
- 04 { • The HPC suggests that implementation of the Sharp Park restoration activity to construct a post and rail fence along the seawall of the golf course described in I-CP- 8 (Page 14) *would* cause a substantial adverse change in the significance of the Sharp Park Golf Course.
- 05 { • The HPC also commented that it is likely that future projects involving federal permitting or funding will be reviewed and commented on by the Commission as part of the National Environmental Policy Act (NEPA) process.

The HPC appreciates the opportunity to participate in review of this environmental document.

Sincerely,

Charles Chase, President
Historic Preservation Commission

www.sfplanning.org

BAGCNC-1

RECEIVED AT CPC HEARING 10/6

2005.1912E

J. Range

Bay Area Golf Club of Northern California

Nathaniel Jackson, President

407 Monticello Street, San Francisco, CA 94127

Telephone 415-407-7675 • Email: Njackson352@comcast.net

October 5, 2011

Congresswoman Jackie Speier
District Office
400 So. El Camino Real, #750
San Mateo, CA 94402

Hon. Ed Lee, Mayor
City and County of San Francisco
City Hall, Room 200
1 Dr. Carlton B. Goodlett Pl.
San Francisco, CA. 94104

San Francisco Board of Supervisors
David Chiu, President
Supervisor Sean Elsbernd
City Hall, Room 244
1 Dr. Carlton B. Goodlett Pl.
San Francisco, CA. 94104

San Mateo County Board of Supervisors
Carole Groom, President
400 County Center
Redwood City, CA. 94063

Hon. Mary Ann Nihart, Mayor
Members of the City Council
City of Pacifica
170 Santa Maria Ave.
Pacifica, CA. 94044

BAY AREA GOLF CLUB SUPPORTS SHARP PARK GOLF COURSE

Dear Congresswoman Speier, Mayors Lee and Nihart,
And San Francisco and San Mateo County Supervisors,

Sharp Park is well-known as "the People's Golf Course," a public course where racial minorities, retired seniors, school children, working men and women, and these days even the unemployed can play golf. Because of its modest fees, all of these groups play golf in large numbers at Sharp Park.

1

BAGCNC-1

The Bay Area Golf Club represents such golfers. We are a mostly African-American club, formed in 1954 and based in San Francisco. We are a founding member club of the Western States Golf Association, one of America's oldest African-American golf organizations.

We were the host club for Western States' inaugural championship tournament in 1955, where the founding member clubs met and played golf together for the first time. That tournament was held at Sharp Park.

It is significant that Sharp Park was built by history's greatest golf architect, Alister MacKenzie. Most of MacKenzie's courses – including the most famous ones like Augusta National—the site of the annual Masters Tournament, and Cypress Point – are private and inaccessible to common people.

Sharp Park is part of San Francisco's egalitarian tradition of providing great classical architecture for its public places. This is the spirit of San Francisco's City Hall, with its golden cupola and soaring dome inspired by Michaelangelo's St. Peter's Basilica in Rome. This great public architecture is San Francisco's way of showing respect to its citizens, to help them respect themselves.


Our members, and all who play golf at Sharp Park know of its Alister MacKenzie heritage. It is important to them. If San Francisco were to destroy this golf course, the city would be telling our members and those other minority and working-class golfers that the city does not respect or care about them.

The tradition of African-American golf continues at Sharp Park. For over 20 years, Sharp Park has been the home of the annual Senior Swingers tournament, a largely but not exclusively African-American golf event to raise money for the Western Addition Senior Center. The tournament's founder, Riley Jameison, is an African-American golf pioneer, now over 90 years old, who joined the fight in the early 1950's against racial discrimination on the old Professional Golfers Association golf tour.

Today, Bay Area Golf Club members support the First Tee, which has a golf driving range and operates youth sports programs at the Visitation Valley Middle School in the Sunnydale neighborhood.

01 [For these reasons, we thank you for your efforts to preserve the historic Alister MacKenzie golf course at Sharp Park. And we urge you to resist those who would destroy it.

Very truly yours,


Nathaniel Jackson, President
Bay Area Golf Club of Northern California

cc: Willie L. Brown, Jr.

BDunes-1



RECEIVED

SEP 26 2011

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M F A

September 22, 2011

San Francisco Planning Department
1650 Mission Street, #400
San Francisco, CA 94103

RE: Sharp Park Golf Course

To Whom It May Concern:

01

I am writing to express my complete and enthusiastic support for designating the incomparable Sharp Park Golf Course a "historical resource." Its architect, Alister MacKenzie, is one of the great masters of the 700 year old craft and Sharp Park is one of his masterpieces. It is truly a work of living art. As the owner of two golf resorts, Bandon Dunes in Bandon, Oregon and Cabot Links in Nova Scotia, I have a very strong opinion that Sharp Park should not only be preserved but maintained to the very highest standard.

Sincerely,

Michael L. Keiser

MLK/ml

cc: Richard Harris

c/o Mike Keiser
2450 N. Lakeview
Chicago, Illinois 60614
773/348-6410 • 773/929-7123 fax

Round Lake Drive
Bandon, Oregon 97411
www.bandondunesgolf.com
541/347-4380 • 541/347-8161 fax

CAAONC-1

COUNCIL OF ARMENIAN AMERICAN ORGANIZATIONS OF NORTHERN CALIFORNIA



ՀԻՄՈՒՆԱՅԻՆ ԳԱՆՆԱԲՈՐՈՒՄԻՆ ԱՄԵՐԻԿԱՆԱՅ ԿԱԼԻՖՈՐՆԻԱՅԻՆ ԴՆՆԱԿԱՆ ՍՈՑԻԱԼԻՆԻ ԽՈՐՀԱՆՈՒՄ

825 BROTHERHOOD WAY, SAN FRANCISCO, CALIFORNIA 94132 - PHONE (415) 749-1750

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ADMINISTRATIVE SUPPORT
AYKO BOBERIAN

October 5, 2011

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

RECEIVED

OCT 11 2011

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M.E.A.

Subject: Draft Environmental Impact Report

Dear Mr. Wycko:

We believe that the Draft Environmental Impact Report for SNRAMP is an adequate, accurate and complete review of the plan.

It considers a broad range of potential impacts to our City's resources and proposes feasible mitigation measures to address impacts where possible.

The EIR looks at a range of alternatives and discusses the potential impacts for both natural and recreational amenities of the City's Natural Areas.

In Summary,
We feel:

- It is an innovative management plan to safeguard our City's Natural Areas.
- Implementation of the Plan will help prevent the local extinction of plants and animals, improve habitat for wildlife, increase safety, and improve access and recreational use in Natural Areas.
- It provides clear direction to the City on how to prioritize management and restoration of our Natural Areas.
- The Plan is the most cost effective method for managing our resources and protecting these areas for future generations.

Sincerely,

Charles Paskerian
Chairman

MEMBER ORGANIZATIONS: ARARAT ARMENIAN SOCIETY, ARMENIAN AMERICAN CITIZENS' LEAGUE, ARMENIAN ASSEMBLY OF AMERICA BAY AREA REGIONAL, ARMENIAN CHURCH YOUTH ORGANIZATION - ST. JOHN & ST. VARTAN, ARMENIAN DEMOCRATIC LEAGUE, ARMENIAN GENERAL BENEVOLENT UNION - OAKLAND, SAN FRANCISCO, SILICON VALLEY CHAPTERS, ARMENIAN NATIONAL COMMITTEE, ARMENIAN PROFESSIONAL SOCIETY, ARMENIAN RELIEF SOCIETY - EREBUNI - EAST BAY, GARIN - SAN FRANCISCO CHAPTERS, ARMENIAN REVOLUTIONARY FEDERATION, ARMENIAN TECHNOLOGY GROUP, ARMENIAN YOUTH FEDERATION - ROSTOM CHAPTER, BETHEL ARMENIAN EVANGELICAL CHURCH, CALVARY ARMENIAN CONGREGATIONAL CHURCH, HAMAZKAYIN CULTURAL AND EDUCATIONAL ASSOCIATION, HOMENETMEN SCOUTS AND ATHLETIC ORGANIZATION - ANI - SANTA CLARA, SAN FRANCISCO, GARS - WALNUT CREEK CHAPTERS, KNIGHTS OF VARTAN, NORCAL ARMENIAN HOME AND SENIOR SERVICES, SAINT ANDREW ARMENIAN APOSTOLIC CHURCH, SAINT GREGORY ARMENIAN APOSTOLIC CHURCH, SAINT JAMES ARMENIAN APOSTOLIC CHURCH, SAINT JOHN ARMENIAN APOSTOLIC CHURCH, SAINT VARTAN ARMENIAN APOSTOLIC CHURCH, TEKEYAN CULTURAL ASSOCIATION, TRIPLE X FRATERNITY - GOLDEN GATE, MOUNT DIABLO, OAKLAND, PENINSULA CHAPTERS, UNIVERSITY OF CALIFORNIA AT BERKELEY ARMENIAN ALUMNI ASSOCIATION

CBD-1



CENTER for BIOLOGICAL DIVERSITY

October 31, 2011

Sent Via Email to bill.wycko@sfgov.org

Bill Wycko
 San Francisco Planning Department
 Natural Areas Management Plan
 1650 Mission Street, Suite 400
 San Francisco CA 94103
 bill.wycko@sfgov.org

RE: Significant Natural Resource Areas Management Plan DEIR

Dear Mr. Wycko,

The Center for Biological Diversity ("Center") submits the following comments on the draft EIR for San Francisco's Significant Natural Resource Areas Management Plan. The Center for Biological Diversity is a national nonprofit conservation organization with more than 320,000 members and supporters dedicated to protecting endangered species and wild places. The Center has been advocating for endangered species and restoration of natural areas in the San Francisco Bay Area since 1998. Our organization has been extensively involved in efforts to restore Sharp Park and end San Francisco's mismanagement and illegal harm to endangered species at this site.

01

In general, we support the goals of the Natural Areas Plan which promote ecological restoration, community stewardship and sustainable management of San Francisco's natural areas. However, the Natural Areas Plan is severely flawed due to inclusion of a poison pill in the form of a sham "restoration" plan for Sharp Park. The Sharp Park element of the plan is at odds with the best available science on impacts of the golf course, it ignores the recommendations of the only peer-reviewed restoration plan for Sharp Park and it proposes further illegal impacts to endangered species at the site. **Sharp Park should be removed from the Natural Areas Plan.**

02

It is shameful that San Francisco has put the restoration of all of the City's natural areas in jeopardy by including a knowingly controversial and objectionable Sharp Park project which has been discredited by independent scientists, restoration experts and dozens of San Francisco conservation and community groups. We question why San Francisco would include a Sharp Park element that would likely drive San Francisco's namesake species, the San Francisco garter snake, toward extinction - all to promote an unsustainable, money-losing golf course.

If San Francisco approves and attempts to implement the proposed Natural Areas Plan with the sham Sharp Park "restoration" element, it will result in additional litigation against the City for illegal and unnecessary degradation of endangered species habitat.

Arizona • California • Nevada • New Mexico • Alaska • Oregon • Montana • Illinois • Minnesota • Vermont • Washington, DC

Jeff Miller, Conservation Advocate • 351 California St., Suite 60C • San Francisco, CA 94104
 Phone: 415-669-7357 • Fax: 415-436-9683 • jmill@biologicaldiversity.org

CBD-1

We find it curious that the Sharp Park element of the Natural Areas Plan ignores ongoing violations of the Endangered Species Act resulting from golf course activities such as water pumping from wetlands and mowing that are harming endangered San Francisco garter snakes and California red-legged frogs. The Natural Areas Plan ignores the current litigation against San Francisco for continuing illegal activities at Sharp Park without an approved habitat conservation plan or legal permits under the Endangered Species Act. The Natural Areas Plan ignores the pending San Francisco Board of Supervisors vote on legislation to repurpose the golf course and transition management to the Golden Gate National Recreation Area.

02 cont.

The Natural Areas Plan ignores the conclusions and recommendations of leading scientific experts on endangered species and wetlands restoration, who contend that the Park Department's proposed golf course activities impair the long-term survival and recovery of endangered species at the site, and that the Parks Department's alleged compliance plan is not being followed and is unworkable. The Natural Areas Plan ignores the only peer-reviewed science on alternatives for managing Sharp Park, *Conceptual Ecosystem Restoration Plan and Feasibility Assessment: Laguna Salada, Pacifica, California* (ESA-PWA 2011). The peer-reviewed report demonstrates that the best option for protecting and restoring endangered species at Sharp Park is removing the golf course and restoring the functions and natural processes of the lagoon and surrounding wetlands; and that removing the golf course to restore habitat to the east of the lagoon is essential for the long-term sustainability of endangered species found on the site. This approach would also be the most cost-effective option and provide the best flood protection for neighbors against sea-level rise and coastal storm events.

The Sharp Park element of the Natural Areas Plan proposes numerous unnecessary, controversial, discredited, illegal and ecologically damaging projects such as: dredging Laguna Salada and other wetlands with a backhoe; continuing an illegal water pumping and management regime; filling in 5.5 acres of existing wetlands; de-watering endangered species habitat; and removing and evicting endangered species from Sharp Park to Mori Point, an activity that is extremely unlikely to be permitted by state and federal regulators and is illegal without proper permits. The Sharp Park element proposes perpetuating the very illegal management activities that kill and harm endangered species and have resulted in the current litigation against San Francisco.

03

The "restoration" projects proposed in the Sharp Park element elements are not based on any credible science and fly in the face of recommendations from experts on endangered species and wetlands restoration. The proposed pre-activity surveys, worker education program, biological monitoring and illegal relocation of individual endangered species do not in any way adequately mitigate for impacts. The only proposed management actions for Sharp Park we support are those dealing with controlling invasive species, reintroducing native species and fencing dogs out of sensitive wetlands.

04

The DEIR analysis is flawed since it identifies recreation and maintenance alternatives as the "environmentally superior alternatives."

We recommend you remove the Sharp Park element from the Natural Areas Plan and re-read ESA-PWA 2011.

CBD-1

Sincerely,

Jeff Miller
Conservation Advocate
Center for Biological Diversity

CFDG-1

Bock, John

From: Jessica.Range@sfgov.org
Sent: Tuesday, November 01, 2011 3:48 PM
To: Bock, John
Subject: Fw: NAP comments from the Crissy Field Dog Group

Jessica Range, LEED AP
San Francisco Planning Department
Environmental Planning
1650 Mission Street, Suite 400
San Francisco, CA 94103
Phone: (415) 575-9018 / Fax: (415) 558-6409 www.sfplanning.org

----- Forwarded by Jessica Range/CTYPLN/SFGOV on 11/01/2011 03:49 PM -----

Bill
Wycko/CTYPLN/SFGO
V
11/01/2011 03:25 PM
To
Jessica Range/CTYPLN/SFGOV@SFGOV
cc
Subject
Fw: NAP comments from the Crissy
Field Dog Group

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 11/01/2011 03:25 PM -----

crissyfielddog1@a
ol.com
10/31/2011 06:39 PM
To
bill.wycko@sfgov.org
cc
Subject
NAP comments from the Crissy Field
Dog Group

CFDG-1

Dear Mr. Wycko,

Thank you for the opportunity to comment on the San Francisco Department of Recreation and Park's Natural Areas Program EIR. Below is a list of our concerns.

- 01 { 1) There is no evidence in this EIR to substantiate claims that dogs have an impact on plants or wildlife in natural areas. The EIR must be based on solid, documented impacts, and there is no evidence cited to justify closing or reducing the size of any Dog Play Area (DPA).
- 02 { 2) There are a number of places in this EIR that state that dogs MAY impact plants or wildlife, yet offers no evidence these impacts are actually occurring or have ever occurred.
And continues to state: If allowed to be in a natural area, dogs MAY continue to impact plants or wildlife. If there's no proof of an impact, then that impact cannot "continue."
The analysis in this EIR based on this speculation is inadequate.
- 03 { 3) In a few places, the NAP EIR says: Observations indicate dogs are impacting erosion, or natural communities, yet it offers no information on these "observations." Who made them? Were they done in a scientifically and objective way? EIRs should be based on solid, scientific data, not on anecdotal "observations." Any conclusions based on this information is again, inadequate.
- 04 { 4) The EIR does not differentiate between impacts caused by people with dogs and impacts caused by people without dogs. For example, a 200-pound man will have a much more significant impact on plants that he walks on than a 20-pound dog will have on any that it walks on. If there is little difference in the impacts, then the conclusions in this EIR cannot justify banning off-leash dogs from natural areas.
- 05 { 5) The EIR considers only the closures of 15% of total off-leash space when

determining impacts on remaining DPAs and recreation. Because the NAP plan puts 80% of off-leash space at risk of closure in the future, this EIR must also

consider the impacts of this much larger closure on remaining DPAs and on recreation.
- 06 { 6) This EIR acknowledges that there is likely to be a significant and unavoidable impact of DPA closures when combined with closures of off-leash area in the GGNRA. However, the EIR says the nature of the GGNRA closures is "speculative" and therefore it doesn't try to analyze the level of the combined impacts. However, we know that the GGNRA proposed to cut a substantive amount of its off-leash space, and this EIR should analyze the impact of that level of closure when

combined with the NAP closures of 15% and 80%.
- 07 { 7) The EIR assumes that because there will still be relatively large off-leash areas in McLaren Park and on Bernal Hill, that few people will be

forced to drive to other DPAs to walk their dogs, with few resulting impacts on air pollution, traffic congestion, and climate change from the added car trips after the 15% closures take place. However, this EIR does not adequately consider the topography of the remaining off-leash spaces in these parks. If much of the remaining area is steep, people will not be able to use the area, and more people will be forced to drive to other DPAs. This must be analyzed in this

CFDG-1

- 07 (Cont.) { EIR.
- 08 { 8) This EIR does not consider the impact of people driving to other parks if 80% of off-leash space is closed. This analysis must be done.
- 09 { 9) This EIR does not adequately consider the impacts of the use of herbicides, especially Garlon, on dogs who walk either within or adjacent to natural areas (this applies whether dogs are on- or off-leash). Dogs are particularly susceptible to problems from Garlon. This distinction is not made and the analysis of impacts from herbicides must be redone to reflect this.
- 10 { 10) The EIR refers to dogs as "nuisances." It does not consider the positive aspects of dog walking, including the physical and mental health benefits to people who walk with their dogs. These must be included in the analysis of different alternatives. People walk in McLaren Park and on Bernal Hill because they are large enough to take long walks with your dog. Most other DPAs are much smaller and do not offer the same walking experience. This EIR assumes all DPAs are interchangeable. They are not. This must be corrected.
- 11 { 11) This EIR does not adequately analyze mitigations short of closing DPAs if any impacts can be proven.
- 12 { 12) This EIR does not consider any impacts on the social community of people who walk with dogs in areas NAP wants to close. This is especially important if 80% of off-leash space is closed. These are significant impacts and must be evaluated and considered.

We are especially concerned about the "dispersion" issue within the City of San Francisco and the nexus between City Parks' DPAs and the GGNRA off leash areas. Any significant reduction of either area will impact where and how people take their dogs, if it is a safe environment for all park users and would significantly reduce the "quality of life" for thousands of San Franciscans.

Again, thank for the opportunity to comment on this EIR.
Sincerely,

Martha Walters
Chair, Crissy Field Dog Group

CNPS-1

Bock, John

From: Jessica.Range@sfgov.org
Sent: Tuesday, November 01, 2011 3:48 PM
To: Bock, John
Subject: Fw: Significant Natural Resource Areas Mgt Plan - comments

Jessica Range, LEED AP
San Francisco Planning Department
Environmental Planning
1650 Mission Street, Suite 400
San Francisco, CA 94103
Phone: (415) 575-9018 / Fax: (415) 558-6409 www.sfplanning.org

----- Forwarded by Jessica Range/CTYPLN/SFGOV on 11/01/2011 03:49 PM -----

Bill
Wycko/CTYPLN/SFGO
V
11/01/2011 03:24 PM
To
Jessica Range/CTYPLN/SFGOV@SFGOV
cc
Subject
Fw: Significant Natural Resource
Areas Mgt Plan - comments

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 11/01/2011 03:24 PM -----

Jake Sigg
<jakesigg@earthlink.net>
10/31/2011 07:13 PM
To
bill.wycko@sfgov.org
cc
Subject
Significant Natural Resource Areas
Mgt Plan - comments

CNPS-1

Bill Wycko
Environmental Review Officer
San Francisco Planning Dept

We appreciate the hard work by staff to produce this extensive and detailed document. In general, we find the document to be fairly thorough in identifying resources and problems, especially for the 31 natural areas in San Francisco.

- 01 { There are problem areas. For example, the term Urban Forest is used throughout, in spite of the fact that it is not a scientific term and no definition of what constitutes an urban forest exists. The term should be stricken from the document, as it means different things to different people.
- 02 { For many, it means street trees, for others it means the artificial eucalyptus plantations (not forests) which are having a devastating effect on the biological diversity of the areas where they are planted, such as Mt Davidson, McLaren Park, and Glen Canyon. It is proper to evaluate the effects of tree removal, but the effects of non-removal should also be evaluated. One of those effects is the unstable conditions the trees create. The shading, wind protection, and summer fog drip drastically changes the environment, inviting in English and Algerian ivy, and Cape ivy (*Delairea odorata*). Not only are all the native plants of the area eliminated, the eucalyptus and cypress trees themselves are unable to regenerate. The consequence is what we see beginning to happen on Mt Davidson now: trees toppling because of the weight of the ivy and the cutting off of light from the tree crown, making it unable to photosynthesize. Regardless of whether the trees remain, are thinned, or removed, the impacts of non-removal need identification.
- 03 { Feral cats are identified as predators, which they are. But the connotation in the DEIR implies that predators are bad. They are not; native predators are a part of the system that nature has employed for millions of years to bring balance and stability. Non-native feral cats should be identified as deleterious and destabilizing to natural ecosystems and biodiversity.
- 04 { There is mention of scrub, without identifying it as a habitat. We have many different types of ecosystems or habitats: wetlands, grasslands, shrublands, oak woodlands, &c. Scrub as a habitat type should be identified as a scientific community--e.g., North Coastal Scrub. French broom and Himalayan blackberry do not fit in that category.
- 05 { The statement on page 524 (VII.E - Environmentally Superior Alternative) has this astounding statement: "...In determining the environmentally superior alternative for the proposed project, this EIR considers the environmental effects of the project and project alternatives. The Maximum Recreation and Maintenance Alternatives are the environmentally superior alternatives because...." I have no idea what this means, but it sounds like a non sequitur. Please revisit this.

Jake Sigg, Chair
Conservation Committee
California Native Plant Society
Yerba Buena Chapter
338 Ortega Street
San Francisco CA 94122
415-731-3028

DB-1

DOGGIE BUSINESS

San Francisco's Premiere Dog Walker

Oct 30, 2011

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

Dear Mr. Wycko,

I am a native San Franciscan, born at Kaiser Hospital, raised in Forest Hill and these days, I own a home in the Sunset District. I have been here for 58 years. I remember the days, as a kid, that I would take our family dog out for long walks on the beach at Taraval Street. Now, that we can no longer do this (because we are restricted to on-leash only, and what fun is that?), I really feel as though this city is becoming less and less like the friendly town that I grew up in. People in San Francisco are becoming less tolerant of others and angrier as more of our rights disappear.

People that own dogs in San Francisco have been forced to gravitate towards spending their time strolling through dog parks and these parks have almost become community centers for them. In San Francisco, I believe that these days there are somewhere between 150,000 to 175,000 dogs living within our city boundaries with people that adore them and consider them part of the family. In fact, many dogs get to sleep in the same bed with their owners! These people take their dogs to dog parks so that the dogs can release pent up tension from being in the house all day, while their owners are at work and to let them play freely with other dogs, which most dog owners agree is a God given right; and also, the owners can connect with their friends and neighbors to blow off steam about what ever is on their mind in these high-stress times. It is a place for them to feel happy, connected and a place to release anxiety with friends and neighbors, both the dogs and the owners.

When the SFRPD, in the late 1990s, initiated a Natural Areas Program to protect and manage these Natural Areas, there were significantly fewer dogs living in San Franciscan households and there were significantly more areas where dogs were allowed off-leash. Practically, you could go anywhere in the city with your dog and decide if **you** wanted

DB-1

DOGGIE BUSINESS

them on or off-leash. It was **our** decision to put the dog on leash and even if a sign said it was required, as long as your dog was well behaved, everyone, including law enforcement, looked the other way.

One park in San Francisco that I regularly frequent these days is McLaren Park. Since this park is near the Housing Projects, this park has always had a reputation for being a very dangerous place to go, which has kept the community from using it and it had fallen into poor maintenance. There were heroin addicts leaving needles all over the grounds, there were prostitutes in the parking lots, there were pimps and drug dealers peddling their goods, and there were gang fights over the turf. Finding dead bodies was the norm.

01

Dog Walkers and dog owners, are the biggest reason that McLaren Park is now a safe place to take your dogs and kids. Drug dealers and other undesirable people felt uncomfortable using the park and stayed away because of the dogs.

02

Let me get to the point. I am in favor of the Maintenance Alternative. It maintains the "recreation" in city parks and "recreation" is what a city the size of San Francisco needs. With 175,000 dogs in the city, where will they all go, if you reduce the play areas? People will be forced into smaller areas, dogs will fight, people will shout and scream at each other and the only available dog play areas will be trampled so that all vegetation is left dead. Please leave things as they are. We need our parks for the dogs. They are a very, very large part of the community and DOGS AND PEOPLE need a good deal of space to roam.

01

(cont.)

In my opinion, McLaren Park was designated a "dog park" and should remain so. All the other dog parks should remain without change to preserve the sanity. It is easy to tip the scales and have complete chaos on your hands. Why chance it?

Sincerely yours,

Janet Slissman

Owner

DogPACSF-1

Bock, John

From: Jessica.Range@sfgov.org
Sent: Tuesday, November 01, 2011 3:48 PM
To: Bock, John
Subject: Fw: SF RPD NAP DEIS Public Comment

Jessica Range, LEED AP
San Francisco Planning Department
Environmental Planning
1650 Mission Street, Suite 400
San Francisco, CA 94103
Phone: (415) 575-9018 / Fax: (415) 558-6409 www.sfplanning.org

----- Forwarded by Jessica Range/CTYPLN/SFGOV on 11/01/2011 03:50 PM -----

Bill
Wycko/CTYPLN/SFGO
V
To
Jessica Range/CTYPLN/SFGOV@SFGOV
11/01/2011 03:26 PM
cc
Subject
Fw: SF RPD NAP DEIS Public Comment

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 11/01/2011 03:26 PM -----

DogPAC SF
<info@dogpacsf.org>
To
Sent by: bill.wycko@sfgov.org
dogpacsf@gmail.com
m
cc
Subject
SF RPD NAP DEIS Public Comment
10/31/2011 05:07 PM

DogPACSF-1

Comments on RPD NAP DEIS

I visit Golden Gate Park, Spreckels Lake, Panhandle, Randall Museum, Douglass Park, 5th-7th Ave/Lincoln Way, Stearn Grove, McLaren Park, Bernal Hill, Lake Merced among many other DPAs. All city park DPAs are essential for the little greenspace we have in our very urban city.

01

If the GGNRA Master and Dog Management Plans are implemented, the overflow for resident and dog recreation will overcrowd our city parks. To date, the GGNRA has not provided the city with any analysis or metrics of the effects of their plans on city assets.

This must be accounted for BEFORE ANY sweeping adjustment to city parks is considered.

I know of no known science that shows any ill effects of dogs on open spaces. Humans are the most widely perpetrators of environmental destruction, not dogs.

02

Additionally, recent reports of Monsanto's Round Up herbicides and other chemicals that are not only harmful to dogs but the general animal population in the park is untenable. Furthermore, the use of genetically harvested herbicide resistant seeds must never be allowed in the confines of our city.

As a taxpayer and voter of 20 years, I am appalled that the NAP would close down what is one of the core culture and lifestyle in SF. Dogs are our family members whether its a companion for elders, a service dogs for people with disabilities, single people, or families with or without children.

03

1) The NAP EIR provides no evidence to prove claims that dogs have an impact on plants and wildlife in natural areas. An EIR should be based on scientific evidence, and there is little presented here. Because the NAP EIR's analysis of impacts from dogs is not based on any evidence, the analysis is inadequate. Without any demonstrated evidence of impacts from dogs, there is no justification for excluding people with off-leash dogs from natural areas. There is, therefore, no justification for the closure of the DPA at Lake Merced, nor for the reductions in the DPAs at McLaren Park and Bernal Hill.

2) The NAP EIR does not take into account scientific studies that show off-leash dogs have little impact on plants and wildlife, including nesting birds when declaring that dogs have negative impacts. These studies were provided to the Planning Department by SFDOG in its comments on the Initial Study for the NAP EIR. Ignoring them shows that the NAP EIR is inadequate and inaccurate when it comes to dogs and "impacts."

04

3) The NAP EIR repeatedly says: Dogs MAY be impacting protected plant species or wildlife (pp. 297, 298, 305, 306, 472, 473, 502, 517), yet offers no evidence these impacts are actually occurring or ever have occurred. Unsubstantiated claims cannot be made in an EIR. After each of these examples, the EIR then goes on to say: Dogs MAY continue to impact plants or wildlife. If there's no proof of an impact, then that impact cannot "continue." EIRs must be based on observed impacts, not things that "may" happen. The analysis in the EIR based on this speculation is incorrect and inadequate.

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- 04 4) In several places, the NAP EIR says: Observations indicate dogs are impacting erosion, or plant damage, or damage to natural communities (pp. 471, 500, 505, 516, 519), yet offers no information on these “observations.” Who made them? Were they done in a scientifically rigorous way? Were they made by people biased against dogs? We have seen with the GGNRA’s attempts to get rid of dogs and with Point Reyes attempts to get rid of an oyster farm that reports by “observers” biased against dogs or oyster farmers do not stand up to independent scientific scrutiny. Is this the case here as well? We do not know, since the NAP EIR provides no information about them. Again, EIRs should be based on solid, scientific data, and definitely not on anecdotal “observations.” If not, their analyses cannot be trusted and are inadequate.
- 05 5) The NAP EIR does not differentiate between impacts caused by people with dogs and impacts caused by people without dogs. Do people in the natural areas with dogs cause significantly more impacts than people in the natural areas without dogs? Clearly a 200-pound person will have a much more significant impact on plants than a 20-pound dog. Because this was not evaluated in the EIR, the analyses presented in the NAP EIR are inadequate. If there is little difference in impacts, then the EIR cannot justify banning dogs from the natural areas.
- 06 6) The NAP EIR considers only the NAP plans to close 15% of the legal off-leash space in SF city parks when considering impacts on the remaining DPAs and on recreation. However, the NAP plan also calls for expanding the most sensitive areas within natural areas, and this potentially could result in the closure of significantly more DPAs (up to 80% of the total off-leash space currently available in city parks, off-leash space that is located either within or adjacent to a natural area). These added closures (up to 80%) will significantly increase the impacts on recreation, on people with dogs, and on the remaining DPAs. These increased impacts were not considered in the EIR when it evaluated the Project Alternative, and without them, the analysis of the Project Alternative is incomplete and inadequate.
- 07 7) The NAP EIR acknowledges that the NAP plans to close 15% of the DPAs in city parks immediately, when added to the GGNRA’s plans to cut off-leash access by 90%, will have a significant and unavoidable cumulative impact on remaining off-leash areas in city parks and on recreation. However, the EIR says that because they don’t know the final GGNRA plan, they cannot analyze what that cumulative impact will be. We do know what the GGNRA originally proposed (cutting off-leash access on its lands by 90%) and the cumulative impact of that plan, when combined with the NAP closures can and should be analyzed. We saw on Tsunami Friday what the impacts could be. The GGNRA closed both Fort Funston and Ocean Beach to all visitors on the morning of Friday, March 11, 2011 because of concerns that a tsunami triggered by a major earthquake in Japan would strike the coast. The busiest weekend days normally find about 60 dogs at the Pine Lake DPA at any one time. Weekday mornings normally have far fewer, closer to 20. On Tsunami Friday, a Rec and Park Dept staffer counted over 200 dogs at the Pine Lake DPA at 10 am, almost 10 times more dogs than on a normal weekday and more than 3 times the maximum numbers of dogs seen on weekends. This example can be used to quantify the cumulative impacts of the GGNRA and NAP closures of off-leash space. The analysis presented in the EIR, which does not contain this, is inadequate.
- 08 8) The number of DPAs in city parks listed in the NAP EIR is wrong. Page 155 says there are 19 DPAs, when the actual number is 29. To get such a basic fact wrong is shocking and calls into question other information about dogs, such as their alleged “impacts” on plants and wildlife.

DogPACSF-1

- 09 9) The NAP EIR incorrectly summarizes RPD's so-called moratorium on creating new DPAs until a systemwide survey of DPAs is conducted. The NAP EIR says that this moratorium was a directive from the Rec and Park Commission that was announced at the October 10, 2006 meeting of the RPD Dog Advisory Committee (DAC). This is not true. The idea of a systemwide survey of where dogs and DPAs are in San Francisco came not from the Commission, but from RPD staff. It was not discussed at the October 2006 DAC meeting. It was not fully discussed in the DAC until 2007 when RPD made the decision to "sunset" the DAC and conduct the citywide survey. While the survey was being conducted, the DAC was told, there would be a hold on new DPAs. The DAC was told the survey would take maybe a year or a year and a half at the most. The idea of the citywide survey was not presented to the Rec and Park Commission until mid-2007. This was no "direction from the Commission." This hold was never meant to be permanent. Yet the NAP EIR implies it will last for decades (the length of time covered by the NAP EIR) and therefore the EIR does not have to consider new DPAs. In the four years since the DAC was sunset, however, RPD has done nothing on the citywide survey. And now this inaction by RPD is being used to prevent the EIR from considering whether or not creating new DPAs to replace ones closed by NAP could decrease the impacts of the closures. The NAP plan will last for decades, and for the NAP EIR not to consider a major mitigation like opening new DPAs to replace closed ones because of a temporary halt on new designations is absurd. Any analysis of alternatives that does not include this possible mitigation is incorrect and inadequate.
- 11 10) The NAP EIR assumes that, because the DPAs at McLaren Park and Bernal Hill are not being closed completely, the 15% closures will not cause a significant number of people to drive to other parks to walk their dogs. People will just walk in different parts of the parks that are still off-leash, the EIR assumes. However, the NAP EIR does not take into account the topography of the remaining land in the two DPAs. If what is left is mostly steep hills, people will not be able to walk there with their dogs. Thus, even though the acres of off-leash space may remain relatively high in these two parks, the amount of space that is practically available for off-leash access may be much less. This will increase the impacts on recreation and also will make it more likely that people will be forced to drive to other parks to walk their dogs off-leash. This must be included in the analysis of any and all alternatives. Since it is not, the analysis in the NAP EIR is inadequate.
- 12 11) The NAP EIR does not adequately consider the impacts of the use of herbicides, especially Garlon, on dogs who walk either within or adjacent to natural areas (this applies whether the dog is on- or off-leash). In a paper on the effects of Garlon, the Marin Municipal Water District (http://www.marinwater.org/documents/Chap4_Triclopyr_8_27_08.pdf) notes that Garlon can cause kidney problems in dogs because of their limited physiological ability to excrete weak acids such as those in Garlon in their urine (they are somewhat unique among mammals in this). The NAP's reliance on herbicides to speed the removal of non-native plants in natural areas will have a negative impact on the health of dogs walked where it has been applied. This is especially true in Glen Canyon, where Garlon was applied over 30 separate times last year. This impact was not considered in the Hazards and Hazardous Materials section of the NAP EIR and a discussion of the health impacts on dogs of repeated exposure to Garlon should be included.
- 13 12) The NAP EIR says that the impact of people driving to other parks to walk their dogs because of the closures of 15% of off-leash space at Lake Merced, Bernal Hill, and McLaren Park will be less than significant because there will remain sufficient off-leash space in those parks (except for Lake Merced). However, the EIR does not consider the impact of people driving to other parks if 80% of the legal off-leash space in city parks is eventually closed because NAP claims impacts from dogs. This must be included in the analysis of the Project Alternative, and will likely show a much more significant impact than what the EIR now shows.

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14

13) The NAP EIR refers to dogs as “nuisances”. The EIR does not consider any positive aspects of dog walking, including the physical and mental health benefits to people who walk with their dogs. This lack is especially noticeable in sections dealing with impacts on recreation of the various alternatives considered. The reason so many people walk their dogs off-leash in Bernal Hill and McLaren Park is that those areas are large enough that people can hike long distances with their dogs off-leash. The majority of DPAs in city parks are too small for similar hikes. You can play fetch with a dog in these smaller DPAs, but not take a long walk. You cannot have the same recreational experience in a small DPA that you can have in a larger one; DPAs are not interchangeable. This difference in DPAs creates a significant impact on the recreational experience for dog walkers if the DPAs in Bernal Hill or McLaren Park are closed. In addition, there would be a significant negative impact on the physical and mental health of dog walkers if 80% of off-leash space were closed because NAP claims impacts from dogs. This is not considered in the NAP EIR, which is inadequate without it. These negative impacts on the physical and mental health of dog walkers of the 80% closure will be amplified considerably when combined with closures of off-leash in the GGNRA. This must be considered in the cumulative impacts sections.

15

14) The NAP EIR does not adequately analyze mitigations should any impacts from dogs be proven other than closing the DPA. Fences are mentioned briefly, while DPA closures are featured prominently in the EIR. Other mitigations – education, signage, more extensive fencing, etc. – are not discussed. NAP seems to go straight from a single impact to closing the DPA.

16

15) The NAP EIR states that impacts to land use planning can be considered significant if they have a “substantial impact on the existing character of the vicinity.” (p. 176) In all of its analysis of impacts on the existing character of the vicinity, the NAP EIR never considers the impact on the social community of people who walk with their dogs in the DPAs and portions of DPAs that NAP wants to close. This community, in many cases, defines the “existing character” of the park. Dog walkers are perhaps the most diverse group of park users. If you watch dog walkers in SF city parks, you will see kids and seniors, people with disabilities, gay and straight, every ethnic and religious group, and every socioeconomic class walking, talking and laughing together, all united by their common love of dogs. There are few places in San Francisco where you will see so many different types of people interacting without rancor. People who walk in the same park at the same time every day know their fellow dog walkers. These friendships extend outside the park into the neighborhoods, helping create the sense of belonging to a community that is so important in today’s impersonal urban society. Closures and reductions in DPAs (especially if 80% of the total off-leash space in city parks are closed) will have a significant negative impact on these social communities. DPA closures will destroy these communities. Because the NAP EIR did not consider these impacts on community of those who live near and walk in parks, it is inadequate.

17

16) The NAP EIR does not adequately consider the impacts on the social fabric of San Francisco if one-quarter of its city parklands are closed to residents. Natural areas are not generally accessible to people, whether they have a dog or not. The NAP plan calls for the closure of many trails and reduction of recreational access. You cannot play catch with your child, have a picnic lunch, or play with a dog in a natural area. It can only be a plant museum. The EIR does not adequately consider the significant impact on families and the sense of shared community that access to parks fosters in our urban setting.

DogPACSF-1

- 18 17) The NAP EIR does not adequately analyze the impacts on recreation of NAP plans to plant sensitive plant species (those that are listed as either endangered or threatened) throughout its natural areas. These plants, by virtue of their special status, trigger automatic federal and state protections, the primary one of which is severe restrictions on access to people and dogs. The NAP goal to preserve existing remnants of historical habitat does not require the planting of threatened and endangered species.
- There are plenty of native species that are not threatened or endangered that can be planted in San Francisco's urban parks. Ecologists have noted that planting a few sensitive species plants does little to preserve the species. It is not an ecological decision; it is a landscaping decision. So why does NAP feel it should plant so many sensitive species when it knows their mere presence will "require" NAP to restrict access to its lands? The NAP EIR should consider the major negative impact on recreation that planting threatened and endangered species causes in its analysis of the Project Alternative and other alternatives.
- 19 18) The NAP EIR does not consider impacts on recreation and land use from the fact that NAP controls the entire park in over half of the parks (18 of 32) where there is a natural area. No other recreational use is possible in those parks. In an additional 10 parks, NAP controls over 50% of the land.
- Only four of the 32 parks with natural areas have less than 50% of their land controlled by the NAP. A majority of land under NAP control citywide (57%) will have significant restrictions to access by all people (not just people with dogs); that is the amount of land designated as MA-1 and MA-2.
- In 8 parks, all of the land in the natural area are designated as MA-1 and MA-2, with resulting significant restrictions on access to everyone. In some cases, this denial of access will be in the only park within easy walking distance in the neighborhood. The NAP EIR must consider this large-scale denial of access when analyzing the Project Alternative.
- 20 19) The NAP EIR does not adequately consider the negative impacts on aesthetics and land use of poor maintenance in natural areas. In most parks, the NAP plan allocates fewer than 20 days/year for planting/maintenance of the natural areas. In 16 of the 32 natural areas, 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. The NAP EIR should have considered the impacts of scaling back the program to a few areas that can be well maintained, as opposed to the current plans to take over one-quarter of San Francisco's city parkland. The NAP plan is 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.
- 21 20) The NAP EIR does not consider the negative impact on aesthetics of NAP management decisions. 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. Because these impacts were not considered, the NAP EIR is inadequate.
- 22 21) The NAP plans call for cutting down over 18,000 healthy trees simply because they are not native. The NAP EIR does not adequately consider the long-term impacts on climate change and global warming of the conversion of land covered by trees with grasslands. Tree are much better at carbon sequestration than grasslands, and the long-term consequences of this difference are not adequately considered. For more on NAP impacts on trees,

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see: <http://milliontrees.wordpress.com>

23

22) The NAP EIR does not adequately consider the fact that the climate in San Francisco has changed (and continues to change) from the time several hundred years ago that the NAP plan is trying to re-create. Native plants suited to the earlier climate may no longer be suited to today's (and tomorrow's) climate. The NAP EIR does not consider the lack of sustainability of trying to re-create what the habitat was at one snapshot in time when the climate has changed since that time. The environmental consequences (for example, more herbicides, etc.) of trying to force the old habitat into today's climate should be analyzed more thoroughly.

Bruce Wolfe, M.S.W., President
DogPAC of SF

FOW-GGP-1

Friends of Oak Woodlands - Golden Gate Park

Park Partner SFPA

863 Arguello Blvd.

San Francisco California 94118

Co-founders:

Rob Bakewell , Volunteer Steward Oak Woodlands Natural Area

Peter Zepponi, AIA , San Francisco Horseshoe Pitching Club

Attn: Bill Wycko

Environmental Review Officer

San Francisco Planning Department

1650 Mission Street , Suite 400

San Francisco, CA 94103

Comments in regard to Draft Environmental Impact Report (DEIR) for the
Significant Natural Areas Management Plan (SNRAMP)

01

We of ' Friends of Oak Woodlands - Golden Gate Park ' (FOW-GGP) **fully support** the DEIR for SNRAMP as an **adequate** , accurate and comprehensive review of the Plan.

02

The implementation of this innovative management plan will help improve the habitat and landscape for threatened local plants and animals, enhance public safety and improve access and recreational use in the designated Natural Areas.

The Plan provides clear priorities and cost effective methods for management of resources and protection of these for future generations. FOW-GGP's fully supports the SNRAMP , and our mission is to provide stewardship: community advocacy and resources for the realization of the Plan's objectives for the Oak Woodlands Natural Area of Golden Gate Park.

Sincerely,

Robert Bakewell

Co-founder ' FOW- GGP '

rcbakewell@gmail.com

415-710-9617

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DEC 31 2011

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
RECEPTION DESK

GCSAA-1

OCT 31 2011

1 Research Park Drive • Lawrence, KS 66049-3859 • Tel 800.472.7698 • Fax 785.832.4488 • www.gcsaa.org

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
RECEPTION DESK

October 6, 2011

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

**Re: Supporting “Historical Resource Designation for
the Sharp Park Golf Course**

Dear San Francisco Planning Department,

01

On behalf of the Golf Course Superintendents Association of America (GCSAA) I am writing in support of the “historical resource” designation for the Sharp Park Golf Course.

GCSAA is a leading golf organization and has as its focus golf course management. Since 1926, GCSAA has been the top professional association for the men and women who manage golf courses in the United States and worldwide. From its headquarters in Lawrence, Kan., the association provides education, information and representation to 19,000 members in more than 72 countries.

GCSAA's mission is to serve its members, advance their profession and enhance the enjoyment, growth and vitality of the game of golf. The association's philanthropic organization, The Environmental Institute for Golf, works to strengthen the compatibility of golf with the natural environment through research grants, support for education programs and outreach efforts.

01
(Cont.)

Sharp Park Golf Course is a historical and cultural resource, and is recognized as such by local, state and national entities. Not only was Sharp Park designed by Alister MacKenzie, one of the greatest golf course architects of all time, but it is also unique because it is one of the few municipal courses he designed.

Golf is a game that can be played by people of all ages and abilities, and 80% of the golf rounds played in the United States

*Advocacy ~ Professional Development ~ Community
Environmental Stewardship ~ Responsiveness*

GCSAA-1



are played on public golf courses such as Sharp Park. Preserving this historical resource as a place of recreation and good health for all of the people of the City and County of San Francisco and the City of Pacifica, and all surrounding areas, is imperative.

01
(Cont.)

Thank you for your time and for allowing GCSAA to express support of the San Francisco Planning Department's determination that Sharp Park Golf Course, designed by Alister MacKenzie and opened for play in 1932, is a "historical resource" under the California Environmental Quality Act.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Rhett Evans".

J. Rhett Evans
Chief Executive Officer

cc: The Honorable Jackie Speier, U.S. House of Representatives
The Honorable Ed Lee, Mayor, City and County of San Francisco
The Honorable Mary Ann Nihart, Mayor, City of Pacifica
Mr. David Chiu, President, San Francisco Board of Supervisors
Ms. Carole Groom, President, San Mateo County Board of Supervisors
Mr. Philip Ginsburg, General Manager, San Francisco Recreation and Park Department
Mr. Charles Edwin Chase, AIA, President, San Francisco Historic Preservation Commission
The San Francisco Public Golf Alliance

GCSAA is dedicated to serving its members, advancing their profession, and enhancing the enjoyment, growth and vitality of the game of golf.

GGAS-1



*inspiring people to protect
Bay Area birds since 1917*

October 31, 2011

Via U.S. Mail and electronic mail

Mr. Bill Wycko
Environmental Review Officer
SNRAMP EIR
City and County of San Francisco
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103-2479

Re: Final Environmental Impact Report for the Significant Natural Resource Areas
Management Plan Project (2005.1912E)

Dear Mr. Wycko:

I am writing on behalf of the Golden Gate Audubon Society and its more than 10,000 members and supporters regarding the Final Environmental Impact Report for the Significant Natural Resource Areas Management Plan (SNRAMP) Project 2005.1912E. The Project is an excellent opportunity to promote public education and protection of these parks while being sensitive to the natural values and ecology of the area for the next 20 years.

Since 1917, Golden Gate Audubon's members have been dedicated to protecting Bay Area birds and other wildlife, to conserve and restore native habitat, and to connect people of all ages with the natural world. Our members use and enjoy the many parks that comprise the Natural Areas of San Francisco and along the San Francisco Bay and Pacific Ocean. Our members often visit these areas to engage in bird watching, scientific research, and recreation activities. We appreciate this opportunity to comment on the DEIR and improve the Project.

Overall, Golden Gate Audubon is encouraged by the progress made in implementing the Natural Areas Program in San Francisco. While the NAP is still woefully under understaffed and underfunded, the DEIR is a good first step for moving forward. However, the DEIR can be improved in many ways, such as...

01

As an initial matter, Golden Gate Audubon is extremely concerned that the DEIR's inclusion of what is essentially a new project at Sharp Park will derail the approval of the DEIR and implementation of the Management Plan. As presented in the DEIR, the project at Sharp Park is far different than what has been considered in the past and would essentially force a

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Golden Gate Audubon Society comments re: SNRAMP DEIR

October 31, 2011

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01
(Cont.)

decision to be made about management at the site before adequate environmental review and public input has been conducted. The Sharp Park plan, as now included in the DEIR, is likely to result in significant (and in our opinion, successful) challenge to the DEIR, slowing down the implementation process for the entire Project. Therefore, Golden Gate Audubon urges the Planning Department to tier Sharp Park from the DEIR for further study. We address this issue—include the question of piece-mealing review—further below.

For ease of reference, this letter will for the most part follow the structure of the DEIR. It will begin with a comment on the Project Description and Objectives, followed by a discussion of management actions and environmental impacts.

I. PROJECT DESCRIPTION AND OBJECTIVES

A. Project Description

02

Overall, the Project Description adequately describes the SNRAMP program and the purpose of the DEIR. We appreciate that the DEIR provides a list of special management concerns that exist in San Francisco, especially in its Natural Areas. These include:

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

We will address these specific concerns in the Recommendations and Environmental Impacts sections below, but we note that while the DEIR calls out these issues, it does not prescribe adequate management measures to deal with each. Of particular concern is the Planning Department's decision to allow feral cat feeding stations to continue to be operated in San Francisco's Natural Areas. In fact, the DEIR's failure to study the impacts of feral cat feeding stations in the Natural Area may be a fatal flaw that renders it vulnerable to challenge.

01
(Cont.)

We also note that the DEIR makes specific reference to the 2006 version of the SNRAMP, which sets forth a plan for Sharp Park that is very different than the one described in the DEIR. Golden Gate Audubon believes that this is further evidence that Sharp Park should be tiered from the SNRAMP DEIR for further study.

B. Objectives

The DEIR identifies the following objectives of the Project for CEQA purposes. These are:

- To identify issues and impacts adversely affecting ecosystem functions and biological diversity;

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Golden Gate Audubon Society comments re: SNRAMP DEIR

October 31, 2011

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- To identify, prioritize, and implement restoration and management actions designed to promote the functioning of San Francisco's native ecosystem, including the maintenance and enhancement of native biodiversity;
- To identify and prioritize monitoring of natural resources to support an adaptive management approach;
- To provide guidelines for passive recreation compatible with San Francisco's natural resources;
- To provide guidelines for education, research, and stewardship programs; and
- To restore the Laguna Salada wetland complex for the benefit of special status species.

(DEIR, at 82).

03

Overall, Golden Gate Audubon endorses the objectives as set forth in the DEIR. However, we would amend the second-to-last objective to read (new text in underline):

- To provide guidelines for education, research, ~~and~~ stewardship programs, and outreach to inform community members about the value and importance of natural areas within San Francisco; and

We see "stewardship" and "education" as being somewhat more narrow than broader outreach to the community. Alternately, similar language could be inserted under the "Education" or "Stewardship" sections of Section III.E.1 *Objectives and Goals of the SNRAMP*. (DEIR, at 85, 86).

04

One of the clear failures of the Recreation and Parks Department and the Natural Areas Program to date has been the inability to effectively communicate that native wildlife, plants and their ecosystems are valuable and extremely vulnerable assets to the quality of life in San Francisco. In communications stating opposition to the Natural Areas Program, some have argued that because San Francisco is a city, it is inherently "unnatural" and that native ecosystems do not deserve protection. Others seek to push more domestic pets, including off-leash dogs and feral cats, into these few, remnant areas. Golden Gate Audubon believes that the Project must include an outreach element to dispel false information about the NAP, promote the importance of stewardship of natural areas, and help build a political constituency to keep the NAP adequately funded and empowered to meet the other objectives.

C. Description of Natural Areas Program

1. Section III E 3 Description of Natural Areas Program Management

05

Golden Gate Audubon supports additional funding to support additional Natural Areas Program staff. The SNRAMP is a 20-year plan that anticipates growing impacts on the natural areas. To be effectively implemented, the Project will demand more than the ten gardeners that are currently on staff.

GGAS-1

Golden Gate Audubon Society comments re: SNRAMP DEIR

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2. Management Practices

a. Integrated Pest Management

06

Golden Gate Audubon endorses the DEIR's selection of the "least toxic decision making model." (DEIR, at 90). Because the use of pesticides in San Francisco is extremely controversial, Golden Gate Audubon encourages the NAP to develop a comprehensive communication and education package prior to applications, especially near neighborhoods, schools, playgrounds, and other areas that may be accessed by children and other vulnerable groups.¹

b. Tree Management

07

Golden Gate Audubon supports the tree removal proposed in this plan when the tree trimmers and tree removal is made after taking precautions defined above to protect native, nesting bird species. (See DEIR, at 92) Where trees must be removed during the bird nesting season (February 1 – August 1 of each year), surveys should be conducted to avoid unnecessarily disturbing nesting birds. Destruction of birds' nests, eggs, or young constitutes a violation of the federal Migratory Bird Treaty Act, for which there are no take permits allowed.

08

09

Golden Gate Audubon also endorses the intent to remove non-native trees with native trees or shrubs, as is appropriate for the habitat. Golden Gate Audubon cautions the Planning Department that removal of trees results in loss of carbon and carbon-fixing, which may be considered to contribute to climate change. The Department should address this issue in the DEIR because failing to do so may be considered a flaw in the DEIR that leaves it vulnerable to challenge.

c. Erosion Control

10

Golden Gate Audubon encourages the use of site-appropriate erosion control measures. (See DEIR, at 93) For example, in the past, the RPD has dumped piles of redwood chips along Lake Merced, which has resulted in (likely illegal) discharges of the chips and their chemical components into the Lake, changing its chemical composition and adding pollutants.

3. Monitoring Program

11

Overall, Golden Gate Audubon endorses the Monitoring Program as written, but is concerned that the DEIR does not commit the City to fully executing or funding the Monitoring Program. (DEIR, at 94-95) Golden Gate Audubon strongly recommends that this section be improved to identify funding sources and state an affirmative commitment that monitoring will be conducted and that findings will be made available to the public (via reports or other means of sharing data) in a timely manner. This is of particular importance for the monitoring of special status species.

Golden Gate Audubon further endorses the Monitoring Program's component to monitor avian and butterfly abundance and diversity even for species that are not considered to be a "special-

¹ See <http://www.epa.gov/opp00001/ipm/schoolipm/append-b.pdf>

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status.” (DEIR, at 95) The goal of many conservation efforts is to keep “common species common” before they are considered special-status species that require the kind of significant and often controversial management practices necessary to keep special-status species extant.

D. Project-Level Activities (Section III.F.2)

1. Sharp Park

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The full plan for Sharp Park is laid out in Section III.I.23 of the DEIR and we will therefore address it further below. However, for purposes of reviewing the DEIR in its current state, Golden Gate Audubon must comment on the project as described in Section III.F.2. (DEIR, at 97-98) It appears that the Sharp Park project as described in the DEIR is significant different than what was envisioned in the SNRAMP. (See DEIR, at 105). Golden Gate Audubon believes that the Planning Department is attempting to shoehorn a much larger Sharp Park project into the SNRAMP DEIR and creating the potential for confusion, conflict and delay. On that grounds, Golden Gate Audubon recommends that the Planning Department separate out Sharp Park from the rest of the DEIR for further study, public input, and approval.

E. General Recommendations for All Areas (Section III.H)

1. Breeding Bird Habitat

12

Golden Gate Audubon endorses the text included in the Breeding Bird Habitat portion of Section III.H. (DEIR, at 109). However, we recommend that the text be amended to include consideration of nest predators other than the nest-parasite Brown Headed Cowbirds. For example, the number of crows in San Francisco has been increasing in recent years, likely due in part to poor trash management. Therefore, Golden Gate Audubon recommends the following text:

- If surveys indicate that predation by crows, European Starlings, English House Sparrows, or other bird species are subsidized by human activities is a significant problem, consult with CDFG and the USFWS to determine the proper course of action, if any, to address population increases of these species and to minimize effects of these species on native, local breeding birds.

2. Cat Predators

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Feral cat colonies and feeding stations should not be tolerated in any portion of the Natural Areas. The destructive impact on birds and other wildlife has been well documented.² Feral cat

² See *Impacts of Feral and Free-Ranging Cats on Species of Conservation Concern*, available at <http://www.abcbirds.org/newsandreports/NFWE.pdf>; see also *Feral Cat Colonies in Florida: The Fur and Feathers are Flying: A Report to the U.S. Fish & Wildlife Service*, available at <http://www.law.ufl.edu/conservation/pdf/feralcat.pdf> (finding that feral and free-ranging cats pose significant threats to native wildlife and human health); Mott, M. 2004. *US Faces Growing Feral Cat Problem*. National Geographic News Service. Available at http://news.nationalgeographic.com/news/2004/09/0907_040907_feralcats.html (quoting

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feeding stations also feed non-native rats and other species which eat native bird eggs and chicks (raccoons, common raven and western scrub jays). There is an estimated population of 60 million feral cats in the US and their negative financial impact in the US cost \$17 billion.³

Unfortunately, the DEIR states the intent to “[i]mplement the feral cat control policy from the Quail Recovery Plan approved by the San Francisco Commission on the Environment.” (DEIR, at 110)

Section 2.4.3 of the Quail Recovery Plan states:

Board of Supervisors Resolution No. 631-00 specifically requires a quail recovery effort that will be implemented “without killing other animals.” Removal or relocation of predators may result in death and other unintended negative consequences. Therefore, any proposed removal or relocation of predators of any kind must be submitted in writing to the San Francisco Recreation and Park Department for review and recommendation. In each proposed case, the Department will consult with San Francisco SPCA to determine whether the relocation or removal is feasible and, if so, how best it can be done. If the relocation or removal is approved by SFRPD, the Department will utilize the pro bono services of SF/SPCA to accomplish the task unless SF/SPCA declines to participate.

(Quail Recovery Plan, at 3). The Board of Supervisors Resolution No. 631-00 was intended to specifically apply to the Quail Recovery Plan, not to the SNRAMP. It is an extremely unwise management decision to import the strictures of Resolution No. 631-00 into a management for natural areas.

First, Resolution No. 631-00 was intended to apply only to the Save the Quail campaign and was not subject to debate or public input as part of a larger management scheme for all of San Francisco. Second, the Resolution was not considered with the special needs and sensitivities of the Natural Areas Program or its prioritization of the protection of biodiversity. Third, the Resolution was ill-founded in the first instance and constitutes a significant and unnecessary conflict with the goal of protecting native wildlife in the City.

In any event, the DEIR as written prohibits the use of lethal control for “any animal”, including feral cats. It also effectively delegates decision-making authority about the potential removal or other control of feral cats to the SPCA, which is not a government entity and which has unfortunately consistently demonstrated that it prioritizes non-native feral cats over the wellbeing of native birds, lizards, mammals and insects that suffer significant impacts from feral cat colonies and feral cat feeding stations. While the SPCA has repeatedly verbally expressed concern about native animals, it has never once made efforts to reduce their impacts on native

a Cal. Dept. of Fish & Game staff person as saying “Cats do kill wildlife to a significant degree, which is not a popular notion with a lot of people.”)

³ See Hildreth, A. et al. 2010. *Feral Cats and Their Management*. University of Nebraska, Lincoln Extension. Available at <http://elkhorn.unl.edu/public/live/ec1781/build/ec1781.pdf>

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wildlife. Rather, it has consistently fought every reasonable effort to do so. With this language, the Planning Department is putting a non-wildlife organization at the forefront of decisions that have significant impacts on native wildlife and native ecosystems in the Natural Areas Program.

Perhaps more importantly to the viability of the DEIR, Golden Gate Audubon argues that **if the Planning Department intends to implement a prohibition against lethal control in the NAP, the environmental impacts of that policy must be fully reviewed in the DEIR.** The current DEIR provides no data or other information about this policy. If the Planning Department fails to conduct the necessary environmental review, Golden Gate Audubon will consider the DEIR to be fatally flawed and will consider an appeal and all necessary legal challenges.

It would be far wiser for the NAP to develop feral cat control as part of its Integrated Pest Management (IPM) program. (*See*, Hildreth, A. et al. 2010. *Feral Cats and Their Management*. University of Nebraska, Lincoln Extension, at 4)⁴ As part of a planned IPM program, the effort could involve a series of prophylactic measures to prevent feral cat populations from expanding to the point that lethal control would be necessary. (*Id.*) A well-planned, comprehensive program would also reduce the need for extremely expensive and controversial Trap-Neuter-Release ("TNR") efforts, which are of questionable value in reducing colony sizes.

The Planning Department's effort to sweep this issue under the rug is one of the most glaring flaws in the DEIR. As expressed above, unless this issue is given much greater consideration—and the environmental impacts of the policy are fully studied and mitigated—Golden Gate Audubon will be in the unhappy and unwanted position of considering a challenge to the adequacy of the DEIR.

3. Dog Use

Dog-related recreation in the Natural Areas should be limited to areas and activities that are appropriate for each area. (*See* DEIR, at 110) For example, the walking of dogs on leash around Lake Merced may be appropriate, while permitting a dog to swim in the lake off-leash would not. The DEIR could be greatly improved by a site-specific discussion of which dog-related activities will be allowed.

The DEIR and the SNRAMP suffer from the larger problem endemic to San Francisco's management of dog-related activities. Though all city parks permit dogs only on-leash and off-leash in designated off-leash areas, non-compliance with leash requirements is rampant. Despite that dogs are regularly allowed to run off-leash throughout nearly every park in the city, off-leash dogs continue to oppose even reasonable restrictions on dogs in the few Natural Areas covered by this Project.

In any event, any Dog Play Area in any Natural Area should be fully enclosed or otherwise well-marked. Enclosures provide dog owners with a clear explanation of where off-leash activity is appropriate. Enclosures also restrain dogs from activities that may result in significant, negative

⁴ Available at <http://elkhorn.unl.edu/epublic/live/ec1781/build/ec1781.pdf>

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- 15 (Cont.) [impacts on native wildlife and plants in the Natural Area. Finally, enclosures reduce conflicts with other park users and other dogs.
- 16 [Overall, the DEIR would be improved by a greater discussion of the environmental impacts of dogs on the Natural Areas. Because the stated priorities of the NAP, the protection of biodiversity and other natural values should be prioritized over dog-related recreation and other similar activities. Even where biodiversity is prioritized (in this small amount of San Francisco's total park acreage), there should be ample opportunities for responsible dog owners and other visitors to full enjoy the Natural Areas.

4. Urban Forestry

- 17 [Golden Gate Audubon endorses the section of the DEIR relating to Urban Forests practices. (DEIR, at 111). We recommend that the section include text that all urban forest practices will consider impacts to nesting birds during the bird breeding season or where particular trees have been known to be important nesting or roosting sites in prior nesting seasons.

F. Recommendations for Specific Natural Areas (Section III.D)

1. Glen Canyon Park and O'Shaughnessy Hollow (GC/OH) (§ III.I.12, DEIR at 125)

- 18 [Management measure GC/OH - 4a (*Avoid removing trees with red - tailed hawk or great horned owl nests and prohibit tree removal within 150 feet of occupied nest*) provides an illustration off the kind of need for sound urban forestry management discussed above. Tree inventories should be considered while nesting is underway. Information about the local of important nest trees should be recorded, preferably on maps and with GPS units or tree-tagging. Removal of important nesting trees should be avoided, even if those nesting trees are non-native (at least de-prioritized over other non-native tree removals). Staff should assess whether suitable nesting habitat exists nearby for returning breeding raptors or other birds that rely on the tall trees.
- 19 [Golden Gate Audubon strongly endorses management measure 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*). It is known that dogs have significant negative impacts on local birds and other wildlife populations. San Francisco Bay has already lost approximately 90% of its wetland habitats, leaving native wildlife that depend on such habitats few spots for rest, forage, and roosting. Dogs should be entirely excluded from the wetland and any riparian habitat areas. All dog play areas should be clearly delineated, preferably with fences.
- 20 [Give the priorities of the Natural Areas Program, it is appropriate to prioritize protection of wetlands and creek channels above dog-related recreation. Staff should ensure effective implementation of this management measure by monitoring dog-related recreation in the area

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20
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and enforcing leash requirements. A failure to enforce leash requirements will result in the ineffective implementation of this measure.

2. Golden Gate Park Oak Woodlands (Section III.I.14)

21

Golden Gate Audubon strongly endorses the protection of Golden Gate Park's Oak Woodlands. (DEIR, at 130). We do note that dog play areas should be well-delineated, preferably with fences, and that leash requirements should be monitored and enforced.

3. Lake Merced (Section III.I.18)

Lake Merced Park is one of the most important Natural Areas in San Francisco. The park provides nesting habitat to herons in the rookery, waterbirds including grebe species in the lake, Red-shouldered hawks and passerines, including the San Francisco Common Yellowthroat, in the area surrounding the lake. The park is also highly accessible to neighboring communities and receives extensive recreational use.

22

In addition to the management actions already identified, Golden Gate Audubon recommends the following for Lake Merced:

- Improved trash management
 - Trash containers should be made wildlife-proof
 - Trash containers should be emptied regularly; currently trash is overflowing on weekends, attracting pests, non-native animals, and posing health risks.
- Cease dumping green waste along the sides of the lake
 - Green waste dumped around the edge of the lake eventually works its way into the lake, changing its chemical composition and contributing to pollutant problems in the lake, including eutrophication.
- Discourage feeding of all animals.
 - Signs should be installed to discourage the feeding of pigeons, other birds, and animals near the concrete bridge. Signs should be in multiple languages.

23

Golden Gate Audubon endorses management measure LM - 4a (*Maintain and enhance important bird nesting and foraging habitat to include the removal of invasive species and natural recruitment of preferred species*). (DEIR, at 135) Golden Gate Audubon also endorses management measure LM - 7a (Relocate the DPA to a different area to avoid disturbing breeding birds in the current location). Given the current moratorium on DPAs, it is unlikely that the DPA could be moved and that the only viable option is removal. While Golden Gate Audubon supports removing the DPA from the site, Golden Gate Audubon encourages the city to find a suitable location for the DPA that will not result in an impact to native wildlife or plants. While the SNRAMP would reduce the total number of DPAs currently in San Francisco, Golden Gate Audubon reminds the City that new DPAs are being planned for Heron's Head Park, Lennar's Hunters Point and Candlestick Point development sites, Treasure Island, and other sites in the Sunset district.

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4. McLaren Park (Section III.I.19)

Golden Gate Audubon endorses management measures 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 and Geneva Avenue DPAs). (DEIR, at 138-139) As discussed at length above, the priorities of the Natural Areas Program require consideration of the monitoring and protecting of biodiversity and natural habitat values above recreation, including dog-related recreation, which can have significant negative impacts on the environment and other visitors to the natural area. Specifically, Golden Gate Audubon supports the protections at the Gray Fox Creek area and also recommends that if the native grassland and wildflower areas near Shelley Loop and Geneva DPAs show harm to these plants attributed to dogs then adaptive management action should be implemented to protect the plants.

5. Mt. Davidson (Section III.I.20)

Mt. Davidson also provides valuable habitat for hawks, hummingbirds, and other native species. Any tree removal necessary should be conducted in a manner sensitive to these and other nesting species.

II. PLANS AND POLICIES

A. San Francisco Dog Policy (Section IV.A.5)

While the DEIR does not identify any inconsistencies with the San Francisco Dog Policy, Golden Gate Audubon notes that San Francisco's failure to fully implement the Dog Policy does create ongoing and serious conflicts with the priorities of the NAP. (See DEIR, at 155-156) The lack of adequate enforcement of the Dog Policy, especially in sensitive areas where leashes are required or dogs are excluded, has perpetuated conflicts between different users of the park system in San Francisco and exacerbated impacts to local wildlife and plants. The DEIR should include provisions requiring active compliance monitoring and enforcement of the policy to ensure that the application of the Dog Policy is consistent with the NAP.

B. San Francisco Climate Action Plan (Section IV.A.8)

Golden Gate Audubon does not challenge the assertion that the DEIR is inconsistent with San Francisco's Climate Action Plan. (See DEIR, at 156). However, we note that the Project calls for the removal of many trees and other vegetation, which may have impacts on carbon-release and carbon-sequestration. Golden Gate Audubon urges the Planning Department to fully consider these impacts to ensure that the lack of information related to invasive plant removal and carbon-sequestration creates a vulnerable flaw in the DEIR.

C. California Coastal Act (Section IV.A.12)

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Golden Gate Audubon does not take a position as to whether there are any conflicts with the Coastal Conservation Act. We do note, however, that some of the work that may be required to fully implement management at Sharp Park may require permits under the Coastal Act (and other regulations and laws). Golden Gate Audubon does not understand from the DEIR how some parts of the Sharp Park management project can be distinguished from those proposed as part of SNRAMP. Because management of all of Sharp Park should be considered holistically, Golden Gate Audubon encourages the Planning Department to segregate Sharp Park from the rest of the SNRAMP DEIR for further environmental review and planning.

III. BIOLOGICAL IMPACTS

A. Consideration of California Clapper Rail

28

During the bird breeding season of 2011, California Clapper Rail young were observed on multiple occasions at Heron's Head Park. This was the first detection of (likely) breeding California Clapper Rail in a considerable period and it is believed that the nesting pair derived from rail populations further south in the Bay. The appearance of this breeding, endangered bird highlights the importance of all of San Francisco's bayside wetland areas, including, potentially, India Basin. Golden Gate Audubon recommends that the Planning Department consider whether the California Clapper Rail should be included on Table 9.

B. Impacts to Native Plants

Golden Gate Audubon joins in the comments provided by the Yerba Buena Chapter of the California Native Plant Society with regard to the impacts to native special status plants. (See DEIR, at 294-295)

29

Overall, the DEIR would be improved by including a discussion of the value and creation of brush piles in areas where tree trimming or tree removal is planned. Brush piles can provide immense value for wildlife and suppress invasive plant growth.

B. Impacts to Native Birds and Sensitive Bird Species (Impacts BI-2, BI-5).

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Golden Gate Audubon is most concerned with this section's failure to discuss the environmental impacts of implementing General Recommendation 7, especially GR 7a, as formal policy in implanting the SNRAMP. The DEIR does not discuss the environmental impacts arising from GR 7 and does not consider any alternatives to perpetuating feral cat colonies in Natural Areas. The DEIR should be revised to consider different alternatives, including the absolute exclusion of feral and free-ranging cats in Natural Areas and to consider the impacts of all reasonable alternatives for cat population management.

30

To the extent that maintenance activities will have impacts on birds and other sensitive species, Golden Gate Audubon believes that as long as best management practices are in place, monitored, and enforced, impacts to native species should be minimized. (See DEIR, at 313-316) For example, trail-clearing, maintenance, or tree cutting during the breeding season should follow protocols identified in the DEIR to avoid disturbance to breeding birds or other animals.

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The DEIR would be improved by acknowledging that the total San Francisco population of California Quail is approximately 12 birds. The quail have been extirpated from much of the city due to management, including tolerance of feral cat colonies and off-leash dog activities. The quail should be considered a locally significant bird and provided special status protection consideration in the DEIR.

C. Impacts to Sharp Park Will Have Significant and Unavoidable Impacts.

31

Golden Gate Audubon does not agree with the analysis provided under Impact BI-6 that the plan for Sharp Park as laid out in the DEIR will result in impacts that are less than significant to sensitive species with mitigation. (See DEIR, at 319-343) Golden Gate Audubon believes that the breadth of impacts has not been adequately described or studied in the DEIR and is concerned that the incomplete nature of the DEIR in this regard constitutes a potentially fatal flaw that is subject to challenge. Golden Gate Audubon also believes that implementation of the proposed Sharp Park project would inevitably conflict with the federal Endangered Species Act and potentially other federal and state laws, resulting in difficulty in obtaining permits and perhaps further litigation regarding the matter. Golden Gate Audubon reiterates its recommendation to the Planning Department that it tier off study of the Sharp Park project for further study and subsequent review and approval.

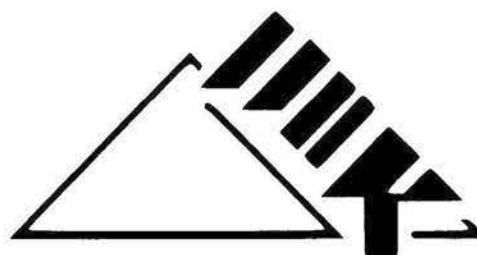
IV. CONCLUSION

Thank you for your consideration of our comments. Golden Gate Audubon will continue to submit comments, both written and verbal, in an effort to improve the SNRAMP project. If you would like to discuss this matter further, please do not hesitate to contact me at (510) 843-6551 or mlynes@goldengateaudubon.org.

Best regards,

Michael Lynes
 Conservation Director

GGHNA-1



Golden Gate Heights Neighborhood Association
P.O. Box 27608
San Francisco, CA 94127

October 31, 2011

Bill Wycko, Environmental Review Officer
SF Planning Dept.
1650 Mission St, Suite 400
San Francisco, CA 94103

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OCT 31 2011

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
RECEPTION DESK

RE: Comment on Significant Natural Resources Area Management Plan EIR

The Golden Gate Heights Neighborhood Association (GGHNA) represents over 400 households in the Golden Gate Heights Neighborhood of San Francisco (bounded by 9th Avenue, Quintara St, 10th Ave, and Kirkham St.). Our neighborhood is composed of primarily single-family homes (mostly homeowners, not renters) densely packed together. We have four parks in our neighborhood, and all of them have natural areas in them – Grandview and Golden Gate Heights Parks, Hawk Hill, and the Rock Outcrop. In every park in our neighborhood, except Golden Gate Heights Park, the Natural Areas Program (NAP) controls 100% of the park. All of the natural areas in the parks in our neighborhood are located on steep slopes.

01

GGHNA has repeatedly expressed our concerns about damage to neighboring homes and property from drifting sand from the parks in our neighborhood, about plans to remove trees from the natural areas, and about poor maintenance in natural areas. We worry that our concerns have been ignored. Indeed, there is little in the NAP EIR to indicate they have been heard.

GGHNA has the following concerns about the NAP EIR:

02

1) **The analysis of impacts from drifting sand is inadequate.**

Years ago, drifting sand was a BIG problem in our neighborhood, especially around Grandview Park and the Rock Outcrop. The parks in Golden Gate Heights are located on the westernmost hills in San Francisco. There is literally nothing that stands between Asia and us and the wind frequently screams through our neighborhood. The wind picks up any open sand in the parks and essentially “sand blasts” our homes, our property, and ourselves. Over the years, neighbors at Grandview and the Rock Outcrop experimented with plants to stabilize the sand in the parks and found that iceplant was the only thing that really worked. While there was still some drifting sand, it was minimized.

Then about ten years ago, NAP staff began tearing up the iceplant and replacing it with native plants. Drifting sand is once again a problem in our neighborhood. The sand blows into

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people's backyards, damaging their property, fills the streets, and clogs the sewers. This is especially concerning on 14th Avenue below the Rock Outcrop, where a very narrow street becomes even narrower when sand drifts into the street. In 2006, a house on 14th Avenue was red-tagged after a major landslide in the backyard smashed into it. The house is immediately adjacent to the Rock Outcrop, where NAP staff had removed large amounts of iceplant. While we cannot say definitively that the iceplant removal caused the landslide, we are concerned that it might have had at least some impact.

At a GGHNA meeting several years ago about the NAP, homeowners who live adjacent to Grandview complained about damage to their backyards from sand that had drifted into them after iceplant in Grandview that had held the sand in place was removed by RPD. NAP staff at the meeting responded that RPD has no "legal" responsibility for damage to property outside of a park caused by sand that drifted into their backyards from the park because of the actions by NAP staff (removing iceplant).

When the NAP Management Plan was released in 2006, it called for "scattered, open sand" in all the natural areas in our neighborhood. Given the NAP staff's arrogant response to our members' concerns about damage, the plan to have scattered, open sand in the parks in our neighborhood has been of great concern to us.

The NAP EIR does not adequately address concerns, especially at the four parks in our neighborhood, about impacts of drifting sand on people's land and property that is immediately adjacent to the parks. This must be considered, and mitigations proposed (such as no scattered, open sand) to address the impacts. We know there are impacts. We see them daily. The NAP EIR must consider these impacts as well.

03

2) The analysis of impacts from NAP tree management is inadequate.

Grandview Park is one of the few parks where tree removal is planned by the NAP. The people in our neighborhood have always loved the trees atop Grandview. Indeed, our association initially formed to fight development of Grandview Park, and the park and its trees make up our logo. We have expressed repeated concerns about the removal of any trees in Grandview, especially since there are so few remaining. At a March 2010 public meeting on the Grandview Trail Restoration Project, attendees were told there would be no tree removals at Grandview. Then, when the final Trail Restoration Project was announced several months later, it included removing "hazard" trees. While we support removing hazardous trees because of public safety concerns, we are concerned about the mixed messages we have gotten from RPD and our inability to find out what will really be done.

The Trail Restoration Project released in 2010 indicated that NAP will "limb" the remaining cypress and eucalyptus trees in Grandview, with no indication of how much pruning would actually be done. We have seen at other parks, such as Tank Hill, that this "limbing" can be extreme, resulting in ugly-looking trees that appear misshapen and do little to slow down the wind. The NAP EIR does not adequately consider the impacts on aesthetics, or on wind and impacts of wind on neighboring properties, or on the trees themselves of the extensive "limbing" planned by NAP staff.

04

3) The analysis does not adequately address impacts from introducing sensitive species into natural areas.

The NAP Management Plan calls for the re-introduction of sensitive species at Grandview and other parks. Because of their special status (threatened or endangered), these species, once planted, automatically trigger additional protections and restrictions, especially in

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GGHNA Comment on NAP EIR 10/31/11

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access. The NAP EIR does not address the impacts on recreation of planting sensitive species in natural areas. It also does not address impacts on neighboring properties if sensitive species are planted. This is especially concerning in the parks in our neighborhood, where the natural areas control the entire park and where sensitive species could be planted immediately adjacent to a homeowner's property. What will be the impact on these park neighbors if invasives from their backyards "threaten" the sensitive species? Will they be held liable in any way because of damage to the sensitive species? Will they be forced to cut down invasive plants on their own property? These impacts should be considered in the EIR.

05

- 4) **The analysis does not adequately address impacts from poor maintenance of NAP areas.** The NAP program has a history of poor maintenance. One of the GGHNA Board members has testified at hearings that he and his daughter once spent a very enjoyable time planting native plants in a NAP-managed natural area. Six months later, when his daughter wanted to see how "her" plants were doing, they went to the park and discovered nothing but a bunch of dead and dying plants. There had been no maintenance done since the original planting. His daughter was devastated at the death of all the plants she had worked so hard to plant.

The NAP Management Plan allocates fewer than 20 days/year for planting/maintenance of each natural area. In 16 of the 32 natural areas, the total maintenance planned is 10 or fewer days each year. A few parks are scheduled for only one work day/year. Clearly, NAP cannot maintain all the areas that it now controls. The NAP EIR must consider the impacts on aesthetics, and on the biological resources themselves of this lack of maintenance. What good does it do to plant native plants if they die within a few months because no maintenance was done? These impacts must be considered in the NAP EIR.

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The Golden Gate Heights Neighborhood Association appreciates the opportunity for us to give, yet again, our comments about the NAP and the NAP EIR. We feel that the NAP EIR is not adequate in the above areas, and that it must be revised to consider the impacts we outlined above. Thank you.

Sincerely,



Sally Stephens
President

GHCC-1



May 19, 2012

Dear Colleagues:

Sharp Park Golf Course is one of only a handful of golf courses that the general public can play that was designed by the world's most famous golf architect, Dr. Alister MacKenzie. It is indeed a national treasure, and although only 14 of the original MacKenzie holes remain they are indeed MacKenzie "gems". Sharp Park opened to great fanfare 80 years ago and MacKenzie was so proud of the layout that he highlighted it in his book "The Spirit of St. Andrews".

There are amazing parallels that Sharp Park shares with a nearby MacKenzie designed course, Green Hills Country Club (Originally the Union League Golf and Country Club of San Francisco). Green Hills was designed by Alister MacKenzie and was formerly the site of an orchard, where flowers were grown and used by John MacLaren for the 1915 Worlds Fair. John MacLaren hired Alister MacKenzie to design Sharp Park. John MacLaren, one of the most famous horticulturists of the time, planted the cypress trees that line the fairways of Sharp Park. Similar Cypress trees are present at Green Hills. Green Hills original clubhouse was designed by Willis Polk Architects, a company that helped to restore much of San Francisco after the great earthquake and fire of 1906. The architect that designed the original Green Hills clubhouse for Willis Polk was Angus McSweeney. Sharp Park's clubhouse was also designed by Angus McSweeney.

When Green Hills was opened in 1930 MacKenzie praised the layout and called it one of the best golf courses on the west coast. Interestingly, when MacKenzie wrote the "Spirit of St. Andrews" Green Hills was only mentioned in one sentence. On the other hand MacKenzie devoted much of a chapter to his pride in Sharp Park and the seaside links design philosophy. This public golf course was indeed one of the works MacKenzie was most happy with in California (which is significant when one looks at the magnificent layouts, almost all private, that he is responsible for. They include

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Cypress Point, The Valley Club, The Meadow Club, Green Hills, Pasatiempo and others).

Those that say that Sharp Park is no longer a MacKenzie layout are grasping at straws. Fourteen of the original holes are still in use (two modified somewhat) and the four replacement holes to the east of Highway One were designed by MacKenzie's assistant, Jack Fleming.

Closing Sharp Park would be a travesty and would forever prevent the average person from playing golf at a course designed by the worlds most famous golf architect.

Sincerely,

Paul Grech

Joseph Michelucci

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San Francisco Bay Chapter / 2530 San Pablo Ave., Ste I / Berkeley, CA. 94702

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San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA. 94103

Re: The Draft Environmental Impact Report for Natural Areas Management Plan

01

We find that the Natural Areas Management Plan has been thoroughly vetted and that the appropriate conclusions, best serving the broad range of interests and needs of the citizens and wildlife of San Francisco, have been arrived at. We therefore strongly support the adoption it's Draft Environmental Impact Report and the final approval of the Management Plan. We have been volunteer participants as a group in the Corona Heights Natural Area habitat restoration project since 1993, and as individuals at Natural Areas throughout the City.

Thank You,

Lin Co. [Signature], 2011 600 Com men Ber
The Gay and Lesbian Sierrans (GLS)
of the San Francisco Bay Chapter of the Sierra Club

MGSG-1

MISSION
GREENBELT
SIDEWALK
GARDENS



Amber Hasselbring
415-786-4957
www.missiongreenbelt.com

Amber Hasselbring
4150-A 25th Street
San Francisco, CA 94114

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

RECEIVED

OCT 12 2011

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M.F.A.

October 5, 2011

Subject: Natural Areas Program and Management Plan

Dear Bill,

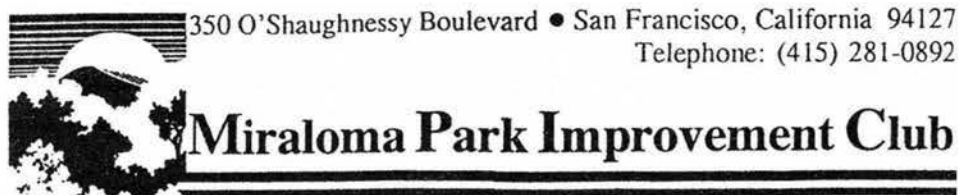
01 I am writing in support of the Natural Areas Program and Management Plan.

- 02
- The Draft Environmental Impact Report for SNRAMP is an adequate, accurate and complete review of the plan.
 - Considers a broad range of potential impacts to our City's resources.
 - Proposes mitigation measures to address impacts where possible.
 - Has been based on detailed studies and scientific experts.
 - Consistent with several directives, including the Recreation and Open Space Element (ROSE), the Public Utilities Commission (PUC) water saving mandates, and the City's Sustainability Plan.
 - Looks at a range of alternatives and discusses the potential impacts for both natural and recreational amenities of the City's Natural Areas.

Most sincerely,


Amber Hasselbring

MPIC-1



October 6, 2011

Bill Wycko, Environmental Review Officer
San Francisco Planning Department
Natural Area Management Plan
1650 Mission Street
San Francisco, CA 94103

Re: Deficiencies in DEIR, Significant Natural Resource Areas Management Plan (SNRAMP):
Mt. Davidson

Dear Mr. Wycko:

The Miraloma Park Improvement Club (MPIC) represents the San Francisco residential community that will be most impacted by the SNRAMP. If required to choose among the alternatives in the DEIR for SNRAMP, the MPIC must urge adoption of the more reasonable Maximum Recreation Alternative (MRA) of the SNRAMP for Mt. Davidson Park because this alternative involves substantially less invasive tree removal, and thus mitigates the extensive and unavoidable impact on this important recreation and cultural resource that the more radical alternatives will involve. We absolutely oppose the Maximum Restoration Alternative because it involves even more tree removal than the proposed project total of 1600 trees and would thus maximize the negative impact on Park recreational use and appearance.

However, even the environmental effect of the proposed removal of 1600 trees is not satisfactorily studied by the draft EIR. For one thing, the projected number of 1600 trees to be removed does not represent all of the trees that would be removed from this historic Sutford forest, because additional trees will have to be removed for reasons not included in the MRA, such as the SFPUC tank and other utility projects, storm damage, and tree death due to age and/or lack of maintenance. To us, the goal of all of the SNRAMP alternatives for Mt. Davidson Park appears to be to deter public recreational use of this Park and make large portions of it into an oak and prairie landscape. This goal is unacceptable to the neighborhood of Miraloma Park, which borders on the Mt. Davidson forest and for which this forest is a major recreational resource and therefore a mainstay of our quality of life and property values. This goal is also inconsistent with historic Park uses and the original status of Blue Mountain, later renamed Mt. Davidson (see below).

In addition to these general objections, the MPIC also finds the DEIR inadequate and inaccurate when addressing the environmental impacts of the SNRAMP in the following specific areas:

1. Preservation of the Historic Forest and Scenic Vistas. The Historic Resource Evaluation Response for the SNRAP confirms that the Mount Davidson natural area is a historic resource and potentially eligible for listing under the CA Register as an ethnographic landscape. The SNRAP project described in the DEIR will significantly negatively impact this historic forest because (1) it proposes that replacement trees can be planted anywhere in San Francisco, rather than in the Park in the location of trees removed; (2) it specifies replacement of trees removed with oaks rather than the historic forest species; and (3) it lacks any plan for replanting the remaining trees (i.e., those trees not subject to planned removal) as the existing historic species reach the end of their lifespan. Furthermore, the project map (see Exhibit A) indicates that areas

MPIC-1

06 where tree removal would be concentrated are the most visible areas within the Park, which is a major scenic and historic resource for Park visitors as well as residents of surrounding communities. Clear-cutting these highly visible areas along major trails and sightlines within the Park will be very detrimental to enjoyment of the Park by its users. Of crucial concern is not the impact on views of the forest from outside of the park—shown on page 193-194 of the DEIR, or the impact on distant views to and from the Park, but the view and experience of the historic forest up close from within the Park; along the trails, roads, and historic monuments within the MA-1 and MA-2 areas where substantial tree removal is proposed.

07 Also, the DEIR is does not clearly define the planned scope and specific impact of the 1000-tree removal planned for the MA-1c area: what percentage are these 1000 trees to be removed of the existing forest in that area: 100%, 75%, 50%, or 25%? If 50% or more, this would more than just thin the historic forest—it would decimate it, a significant negative impact to this historic resource. The EIR should detail the square-footage of the MA-1c, MA-2c, and MA-2e areas where trees would be removed and provide the estimated percentage of trees to be removed from each one. These numbers would help to ascertain the environmental impact with respect to what recreational users will experience within the park.

08 Furthermore, if the MRA alternative or some variant of it is adopted, to mitigate the negative impacts on appearance and recreational use, the MPIC insists that all healthy cypress and pine trees in the MA-1c, MA-2c, and MA-2e areas be allowed to remain. Unlike eucalyptus, these species from the original historic forest are not invasive and add greatly to pleasure of viewing within the Park, as well as hosting a varied bird population that would be lost with their removal. The MPIC further insists that all trees removed from Mt. Davidson as part of SNRAMP be replaced one-for-one within the Park in the locations vacated by the removed trees using cypress, cedar, or pine species in order to maintain the historic visual character of the Suto forest. The historic cypress and pine species and cedar as well are neither exotic nor invasive, grow much faster than oaks, and are more suited than oaks to survive the soil and climate conditions in Mt. Davidson Park. In fact, oaks never existed on Blue Mountain or Mt. Davidson, so no valid argument can be made for replacement of removed trees with oaks.

09 Finally, tree removal from the MA-1c and MA-2c areas as part of building and native plant restoration has already left unsightly stumps, remnants, and debris along the most accessible and visible areas inside the forest sectors of the park (See Exhibit B attached). The MPICs require that any trees killed for SNRAMP be totally removed—all the way to the ground—so that no unsightly stumps are left to negatively impact the aesthetic view from within the park. Also, non-native vegetation and tree parts removed by City staff thus far has been left in unsightly debris heaps along the public trails. This significantly negatively impacts the Park as a scenic resource for those wishing to enjoy the beauty of nature along the Park trails. The MPIC requires that the debris created by the SNRAMP project be collected and dumped away from public view or removed from the park all together.

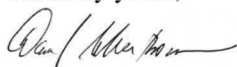
10 2. Noise and Wind Pollution Mitigation. The DEIR addresses the noise-pollution impact anticipated from the actual tree clearing to residents adjacent to the park. However, the DEIR does not address the MPIC's concern that tree removal will result in a substantial permanent increase in ambient noise levels heard by visitors within the park. The nearby 280 freeway, BART, and Portola Drive are substantial sources of noise currently partly mitigated by trees slated for removal. The Final EIR should compare sound readings within the MA-1a area with those in the MA-3a areas to demonstrate the impact of MA-1c and MA-2c area tree removal on noise levels along the Park road and trails surrounding the summit of the mountain. Furthermore, the trees in the MA-1c area now serve as a wind-break, and we believe their removal will significantly increase wind in inside the park and thus negatively impact the experience for visitors within the Park. The EIR should address this potential impact, which could be documented by taking wind speed-readings from the now treeless northeast viewpoint of the Park and comparing these readings with other readings from the MA-3a areas.

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MPIC-1

- 12 3. Recreational Use. The DEIR notes that Mt. Davidson Park has high recreational values and trail use by the citizens of San Francisco, yet it does not address the impact of the project tree removal plan on fostering the growth of the invasive native poison-oak or how this significant negative impact on Park visitors will be mitigated. Where trees have been removed thus far, we have seen a significant increase in poison oak, often along hiking trails, and we believe this proliferation of poison oak will increase substantially as more trees are removed. The MPIC reiterates its request for the project plan to include a policy to keep poison oak at least 10 feet away from all trails at all times.
- 13 The DEIR also does not address the negative impact on Park visitors of prohibiting benches in scenic view areas within the MA-1 sector in order to deter off-leash dogs. The DEIR does not assess how leash rules could be effectively enforced or that, instead of pursuing such enforcement, City staff are choosing to remove recreational amenities such as benches in sensitive plant areas. This policy significantly negatively impacts recreational experience of one of the best views in San Francisco. There is now only one bench in Mt. Davidson Park, and for full enjoyment by recreational users additional benches should be installed throughout the Park.
- 14 4. Economic Factors. The DEIR lacks any cost estimate for implementing the SNRAMP and has no information about how it will be funded. It also does not address the potential impact of shifting resources such as park bond funds away from recreation and park maintenance/improvements to complete the SNRAMP. The substantial cost of removing the trees from Mt. Davidson will divert significant resources from providing what the MPIC considers a higher priority for resource use: basic maintenance of Mt. Davidson Park including litter and graffiti removal, forest and trail maintenance, and installation of benches and trail direction signage.
- 15 In summary and conclusion, mitigation measures for any approved Natural Areas Plan tree removal and trail closure should include 30-day advance notification to the MPIC of specific cutting planned and the right of interactive review and potential adjustment of specific removals by the MPIC—the neighborhood most heavily impacted by the Plan. Furthermore, any trees cut down should be completely removed to ground level and all remnants taken away in order to maintain the aesthetic quality of the forest and park. The Plan should also include monthly removal of all poison oak within 10 feet of trails and maintenance and protection of historic Works Project Administration (WPA) trails and retaining walls. Any activity for implementation of the SNRAMP should not restrict public use of the park or access to the historic area or viewpoints for more than 30 days at a time.
- 18 If the Planning and Recreation and Parks Departments do not adopt the Maximal Recreation Alternative and are not willing to completely implement the above-requested mitigations to the SNRAMP and augmentations to the DEIR, the MPIC requests that these Departments remove Mt. Davidson from the SNRAMP. This would be the only acceptable solution to avoid permanent degradation of this important recreational and aesthetic resource for residents of the second densest city in the United States.

Sincerely yours,

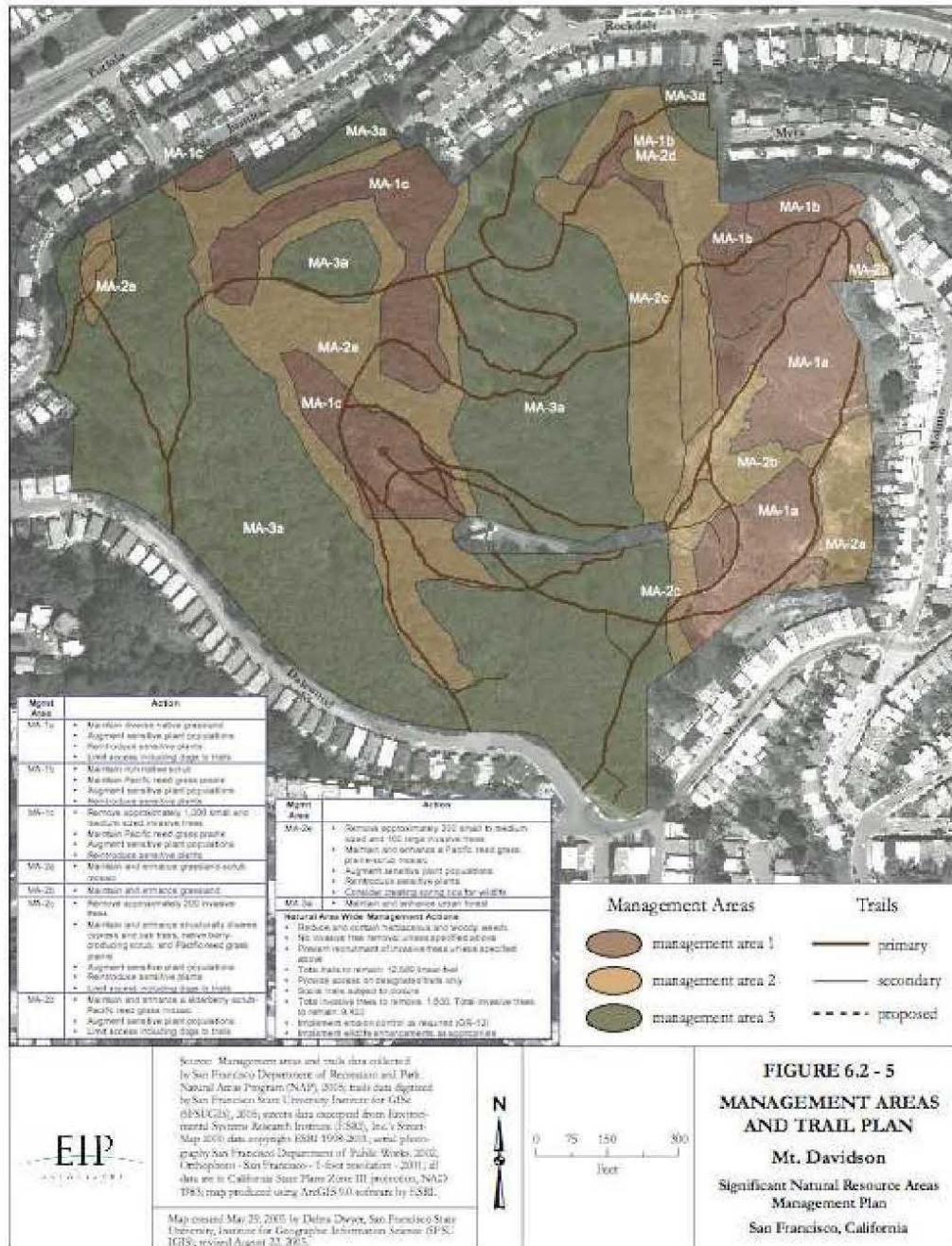


Dan Liberthson, Corresponding Secretary

Cc: S. Elsbernd, P. Ginsberg, West of Twin Peaks Central Council, West Portal Monthly, Westside Observer, SF Parks Alliance, M. Welther (Golden Gate Audubon Society)

MPIC-1

EXHIBIT A. Plan Map



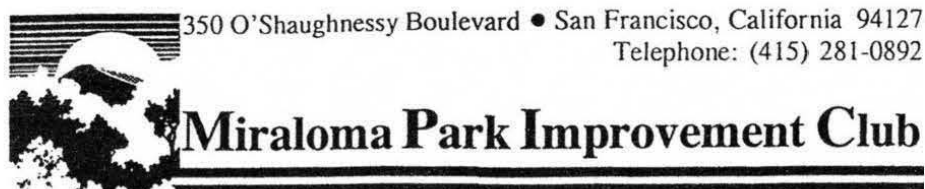
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MPIC-1

EXHIBIT B. Debris and Remnants from Tree Removal



MPIC-2



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June 7, 2012

Bill Wycko, Environmental Review Officer
 San Francisco Planning Department
 Natural Areas Management Plan
 1650 Mission Street
 San Francisco, CA 94103

Re: Deficiencies in Draft Environmental Impact Report (DEIR) for the Significant Natural Resource Areas Management Plan (SNRAMP) for Mt. Davidson

Dear Mr. Wycko:

01 The Miraloma Park Improvement Club (MPIC) represents the San Francisco residential
 community that will be most impacted by the SNRAMP for Mt. Davidson Park. The MPIC
 agrees with the conclusion in the DEIR for the Natural Areas Program (NAP) that removing
 1600 trees from Mt. Davidson Park, eliminating 2900 feet of trails, and restricting access to
 6 acres of this neighborhood park, located within one of America's densest cities, in order to
 implement the proposed project will result in a significant and unavoidable negative cumulative
 environmental impact on the irreplaceable cultural, recreational, and biological resources of Mt.
 Davidson Park. We agree with the conclusion of the DEIR (page 525) that the Maintenance and
 Maximum Recreation Alternatives are the Environmentally Superior Alternatives because these
 alternatives involve removal of substantially fewer trees and less access, as well as less herbicide
 use. We absolutely oppose the Proposed Project and Maximum Restoration Alternatives because
 02 of the significant and unavoidable negative environmental impact these plans would have on the
 Park's aesthetics, cultural resources, wind and shadow, recreation, biological resources,
 hydrology, hazardous materials, and air quality. If these alternatives are approved and
 03 implemented, the MPIC will seek to have Mount Davidson Park removed from the Natural Areas
 Program and returned to its original purpose as a recreational facility subject to all of the
 maintenance standards required by Proposition C, passed by voters in 2003.

Since our comment letter was sent in last October, we have uncovered even more deficiencies in the DEIR for the SNRAMP. Central to these deficiencies are inconsistencies in the SNRAMP for Mt. Davidson that were not addressed in the DEIR and therefore led to flaws in its conclusions. We find the DEIR deficient in analyzing the potential negative environmental impacts of the project on aesthetics, cultural heritage, wind and shadow, hydrology and water quality (including erosion), air quality, and increasing hazardous materials. The DEIR does not adequately assess these impacts despite the potential for more tree loss from increased windthrow, increased erosion onto properties next to the park, significant reduction in CO₂ absorption, loss of existing animal and bird habitat, and the fact that maintenance of the native plant area would require frequent applications of herbicides classified by the City as "Most Hazardous" and "More Hazardous" to control non-native plant growth.

MPIC-2

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The DEIR's conclusion that the tree removal on Mount Davidson Park would have less than significant impact on this historic landscape and forest is based on incomplete analysis. Much of the inaccuracy of the analysis is stated on page 191 of the DEIR:

"The assumption that the SFRPD intends to spread the overall tree removal across the forested portion of a Natural Area and would not concentrate it in a particular location ... Removing clusters of 20 or more trees over half an acre would still leave the surrounding forest and its aesthetic value intact. Also no Landmark Trees would be removed or altered."

This assumption is inconsistent with Appendix F of the SNRAMP, page 14, which indicates plans to remove trees in a concentrated area of 10.2 acres in order to convert 1/3 of the current 30.1 acre forest into a grass and scrub landscape. It indicates that a substantial amount equal to 82% of the trees in the 3.5-acre MA-1c zone would be removed. Two other zones within the 10.2-acre relandscaping area would lose 23-31% of their trees. This 10.2 acres would in fact lose substantially more than 40 trees per acre, as stated in the DEIR page 195. The MA-1c zone would lose 286 trees per acre, MA-2c 111 trees per acre, and MA-2e 82 trees per acre. These areas would be substantially reduced from the current 350 trees per acre to as low as 63 trees per acre in what amounts to deforestation – not thinning. Statements that only sick and dead trees would be removed are inconsistent with the reality that any person looking at this area of the park could not agree that 82% of the trees are in this condition now.

Removing the trees over a 20-year period would not mitigate the substantial, cumulative, negative environmental impact. There are errors in the SNRAMP that were not addressed or corrected, as on Appendix F, page 8, for example: "The bulk of the tree removal [on Mount Davidson] will occur in MA-2e ..." – inconsistent with page 14, which lists 23% for MA-2e, the least planned tree removal.

05

While The Historic Resource Evaluation Report (HRER) in the DEIR declares the landscape historic, the analysis is limited to the retaining walls and steps. A cultural landscape study is required to evaluate the historical significance of the forest landscape and the impact of the project on this significant resource, as requested by the MPIC letter regarding the SNRAMP Initial Study. All of the environmental impact conclusions of the DEIR regarding Mt. Davidson Park require additional analysis to address the concentrated historic tree clearing actually proposed in the SNRAMP for Mt. Davidson.

06

The DEIR does not address the economic impact of the significant financial resources that would be diverted from SF Park and Recreation services to implement SNRAMP. There is no cost estimate for implementing the SNRAMP and no information about how it will be funded. It also does not address the potential impact of shifting resources, such as park bond funds, away from recreation and park maintenance and improvements in order to complete the SNRAMP. The substantial cost of removing the trees from Mt. Davidson will divert significant resources from providing what the MPIC considers a higher priority for resource use: basic maintenance of Mt. Davidson Park, including litter and graffiti removal, forest and trail upkeep, and installation of benches and trail direction signage. Ongoing costs for herbicide spraying, erosion control, replanting, and fencing are also not addressed.

MPIC-2

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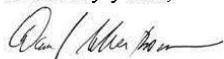
In conclusion, the goals and current scope of the SNRAMP project for Mt. Davidson are incompatible with, degrade, and subordinate the goals and needs of those who live next to and use this important San Francisco park and recreation resource. The following SNRAMP proposals would all have significant negative environmental impacts for the residents of Miraloma Park: concentrated removal of 1600 trees; closure of 2,900 feet of unidentified trails; limitation of dog access to nearly six acres of the park; continued use of hazardous herbicides; prohibition of recreational amenities as defined by the Park Maintenance Standards developed to implement Proposition C in 2003; leaving maimed trees and trim waste in the park; disregard and degradation of the forest's historic and cultural value; and the failure to develop a vigorous reforestation plan for the MA-3 zones (with the same species). While the SNRAMP is described as a community-based program, the DEIR does not describe any meaningful way for residents to modify this plan once it is approved.

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(Cont.)

Therefore, if the Planning and Recreation and Parks Departments do not adopt the Maximum Recreation or Maintenance Alternative, are not willing to fully analyze the additional impacts inadequately addressed in the DEIR, and fail to reduce the scope of the SNRAMP, the MPIC will request that Mt. Davidson Park be removed from the SNRAMP. This would be the only acceptable solution to avoid permanent degradation of this important environmental resource for residents of one of the densest cities in the United States. Mount Davidson Park is a public treasure – not a biological museum.

Following are our detailed comments on the DEIR regarding wind, forest resources, cultural landscape, erosion, aesthetics, recreation, noise pollution, herbicides, and wildlife.

Sincerely yours,



Dan Liberthson, Corresponding Secretary

MPIC-2

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I. Wind

The forest in Mt. Davidson Park is a significant wind barrier. The SNRAMP project disregards this fact in its proposed doubling of the existing native plant area of the park by converting a third of the forest area (10.2 acres) into a prairie/coastal scrub landscape. The DEIR statements that this is thinning the forest and would involve removal of only 15% of all the trees are misleading, as the trees are actually proposed for removal in a concentrated 10.2-acre area (p. 14, SNRAMP – Appendix F). The DEIR therefore does not adequately evaluate the potential damage to the remaining forest from windthrow after implementation of the 1000-tree removal planned for the MA-1c area. This concentrated removal, estimated by the SNRAMP to be 82% of the trees in this 3.5-acre area, is substantial – not mere thinning.

08

The DEIR concludes that the wind impacts would be less than significant because trees would be removed in accordance with the Urban Forestry Statements in Appendix F of the SNRAMP. This is an inaccurate conclusion because it does not address the statement in Appendix F that substantial tree removal should not occur in the MA-1c and MA-2c areas because this would increase the rate of windthrow. The DEIR states that ground-level wind hazards would not increase along the trails of Mt. Davidson because mostly small and medium trees would be selectively removed. This is incorrect. The MA-1c zone, which will lose 82% of its trees, is the location of the major and most popular trails in the park, which cross this zone in several locations. This concentrated removal would therefore result in a significant negative impact to this cultural, recreational, and biological resource.

The EIR should acknowledge the above inconsistency in the SNRAMP by recommending a significant reduction in the percentage of trees to be removed in the MA-1c area, to 15% or less, in order to avoid an increase in windthrow that could damage or kill trees, as well as expose trails and hikers to a significant increase in wind hazard created by making this area an exposed hilltop. In the existing situation, the forest serves as a wind-break and provides protection to visitors from the high wind speeds that prevail in this area. The EIR should address this potential cumulative negative impact, which could be documented by taking wind-speed readings from the now treeless northeast viewpoint of the Park and comparing these readings with other readings in the MA-1c zone, which would lose 82% of its trees.

II. Forest Ecology Considerations

09

MPIC agrees with the DEIR that a major reforestation effort should be undertaken by the City to rejuvenate Mt. Davidson Park's historic forest canopy. This should be a higher budget priority than tree destruction. The DEIR is deficient in documenting the scientific source for its statement that the proposed concentrated tree removal on Mt. Davidson will in fact make the remaining forest areas healthier than would improved maintenance – such as clearance of ivy, trimming of potentially hazardous branches, and replanting of new trees of the same species to rejuvenate the forest, rather than allowing it to die from neglect. The DEIR should include as detailed a forest management plan for the MA-3 area of the park as it does for the vegetation of the MA-1 and MA-2 areas. It should further recommend that management of the MA-3 zones be transferred to the Recreation and Park Department's Urban Forestry Division, because Natural Areas Program staff lack the arborist and forestry expertise necessary to properly maintain the forest.

MPIC-2

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The MPIC finds the conclusion in the DEIR that converting 10.2 acres of the park from forest to prairie reed grass will have a less than significant impact to be based on inaccurate and incomplete documentation. The DEIR (page 408) states that the total number of trees would not change within the Natural Areas. It further states that San Francisco trees are protected by the San Francisco Urban Forestry Ordinance (page 410). This is inaccurate and inconsistent with Table 5 (page 114), which says that a total of 18,448 trees will be lost in the Natural Areas if the proposed project is implemented. **The DEIR further states that one-for-one replacement trees can be planted anywhere in San Francisco, rather than in the Park or the specific location of trees removed and it specifies replacement of trees removed with slow-growing oaks rather than the historic forest species.** The actual goal of SNRAMP project – to eliminate, not thin or rejuvenate – the historic forests in these parks should be factually stated, although we strongly object to this goal. The DEIR states that no landmark trees will be removed; however, no trees in the SNRAMP areas are currently protected by landmark status. We must ask, do the Urban Forestry or Landmark Tree ordinances even apply to trees in City parks or Natural Areas? If not, references in the DEIR to these ordinances should say so, in order to avoid misleading readers into thinking that these historic trees are eligible for and subject to these protections.

11

SNRAMP Figure 6.2-3, Vegetation for Mt. Davidson, significantly undercounts the number of Monterey Cypress trees growing in the areas described as blue gum forest by incorrectly showing the cypress as limited to a very small area on the southeastern edge of the park. The SNRAMP vegetation inventory of Monterey Cypress should be corrected, and these cypress trees should be exempt from the tree clearing proposed to implement this program. Neither Monterey cypress nor Monterey pine are invasive, and both add greatly to the recreational and aesthetic experience within the Park, including hosting a varied bird population that would be lost with their removal. Even the California Invasive Plant Council agrees with this assessment. Both of these species are California natives; fossil evidence shows that they existed on the San Francisco peninsula in the distant past.

12

On Mt. Davidson, plans to destroy 1,600 trees over 15 ft tall include many Monterey cypresses. In this particular “natural area,” it is not accurate to say that “most” trees that will be removed are invasive. Since these species are native to California and have existed in San Francisco in the past, it is an exaggeration to call them non-native. The MPIC insists that all healthy cypress and pine trees in the MA-1c, MA-2c, and MA-2e areas be allowed to remain and that new cypress or pine be replanted one-for-one within in these same zones to replace each blue gum eucalyptus cut down. Furthermore, any trees removed from the MA-3 zone also should be replaced with the historic cypress, cedar, or pine species in order to maintain the historic visual character of the Sutro forest. These species grow much faster than oaks, and are more suited than oaks to survive the soil and climate conditions in Mt. Davidson Park. In fact, oaks never existed on Mt. Davidson, so no valid argument can be made for replacement of removed trees with oaks.

The projected 1600 trees to be removed does not represent all of the trees that would be removed from this historic forest. Additional trees will and have been removed for reasons not addressed, such as the SFPUC tank and pipeline upgrade, installation of utility lines, storm damage, vandalism, and tree death due to age and/or lack of maintenance. The Natural Areas Program does not document how many trees have been removed from the forest already, and so the 1600

MPIC-2

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goal is a moving target and is unenforceable. Approximately 100 trees were removed in 2008 to move the Mt. Davidson pipeline from the native plant area to the area designated for forest preservation. Only 5 replacement trees were planted.

The evident goal of the SNRAMP for Mt. Davidson Park is to deter public recreational use and to double the existing native plant area of the park by converting a third of the forest area (10.2 acres) into a prairie/coastal scrub landscape. The SNRAMP estimate of 353 trees per acre on Mt. Davidson is half of that estimated by UCSF for their forest on Mt. Sutro, which is similar in density and age. The SNRAMP forest management goals of 50-100 square feet of basal area per acre in the MA-1 area would leave only 23-46 trees per acre, assuming an average tree diameter of 20 inches; 100-200 sqf basal area for MA-2 would leave 46-92 average 20-inch trees per acre and just 92-275 trees of this average size per acre in the MA-3 forest zone. The result would be even more than 1600 trees permanently removed, especially if the total trees per acre are now closer to 750 than 350. This goes beyond "thinning ... to improve the health of the forest by relieving crowding," as the DEIR describes the plan. No evidence is provided that this extensive clearing will improve the health of the forest. In any case, such major clearing is unacceptable to the neighborhood of Miraloma Park, which borders on the Mt. Davidson forest and for which this forest is a prime recreational resource and a mainstay of our quality of life and property values.

13

The DEIR also justifies the destruction of thousands of trees on the grounds that they are non-native and "invasive":

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. (DEIR, page 456)

In fact, there is no evidence that any of these trees are "invasive." Although the California Invasive Plant Council has classified eucalyptus as "moderately invasive," there is no scientific evidence to support this claim. According to the US Forest Database of Plants and Trees, "It [blue gum eucalyptus] does not spread far and rarely invades wildlands." (<http://www.fs.fed.us/database/feis/plants/tree/eucglo/all.html>)

In "Vegetation Change and Fire Hazard in the San Francisco Bay Area Open Spaces," William Russell (US Geological Survey) and Joe McBride (UC Berkeley) used aerial photos of Bay Area parks taken over a 60-year period from 1939 to 1997 to study changes in vegetation types. They studied photos of 3 parks in the East Bay (Chabot, Tilden, Redwood), 2 parks in the North Bay (Point Reyes, Bolinas Ridge), and one on the Peninsula (Skyline). These photos revealed that grasslands are acceding to shrubland, dominated by native coyote brush and manzanita. Eucalyptus and Monterey pine forests actually decreased during the period of study. In those cases in which forests increased in size, they were native forests of oaks or Douglas fir. In other words, **these researchers found no evidence that non-native trees are invading native trees or shrubs.**

MPIC-2

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Implementation of SNRAMP will result in a significant loss of stored carbon.

The urban forest of San Francisco stores 196,000 tons of carbon and adds to that accumulated store of carbon at an annual rate of 5,200 tons per year, according to a US Forest Service survey (Nowak 2007). About 25% of the annual rate of sequestration and the accumulated storage of carbon are accomplished by the blue gum eucalyptus, the chief target for destruction by SNRAMP. When a tree is destroyed, it releases the carbon that it has accumulated throughout its lifetime into the atmosphere as carbon dioxide (CO₂) as it decays. CO₂ is the predominant greenhouse gas that is causing climate change. Since greenhouse gases are regulated in California by a law that commits the state to reduce greenhouse gas emissions, the DEIR for the NAP goes to great lengths to make the case that destroying thousands of trees will not violate California law. The DEIR's claim that the implementation of SNRAMP will not contribute to greenhouse gas emissions is based on:

- Fabricating facts by misrepresenting scientific studies. The facts are:
 - Grassland in San Francisco does NOT lower ground temperature.
 - Grassland does NOT store more carbon than forests.
- Confusion of the RATE of carbon sequestration with the total accumulated carbon storage in the plant or tree as it continues to grow.
 - While a young tree may sequester carbon at a faster RATE while it is growing rapidly, as the DEIR maintains, that does not alter the fact that a mature tree stores more carbon over its lifetime as the carbon accumulates.
 - Replacing mature trees with ANY plant or tree will never compensate for the loss of the carbon stored in the trees that will be destroyed. Managing the forest by thinning and reforestation does NOT compensate for the loss of carbon stored in mature trees.

14

These misrepresentations and confusions are discussed in detail in the following subsections.

Grassland in the San Francisco Bay Area does NOT lower ground temperature.

The DEIR claims: "According to a study presented at the American Geophysical Union's meeting, **grasslands above 50 degrees' latitude** reflect more sun than forest canopies, thereby keeping temperatures lower by an average of 0.8 degree Celsius." (DEIR, page 457, citing Jha A, "Planting trees to save planet is pointless, say ecologists" in *The Guardian*, 12/15/2006). However, the DEIR's statement does not apply to the San Francisco Bay Area and the reference used to support the statement misrepresents the cited study, because:

- The entire continental United States, including the San Francisco Bay Area, is below 50 degrees latitude. In other words, this statement—even if it were true—would not apply to the San Francisco Bay Area.



MPIC-2

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- The statement is taken out of the context of the article. The entire sentence in which this statement appears actually says, “Grassland or **snowfields**, however, reflected more sun, keeping temperatures lower. Planting trees above 50 degrees latitude, such as in Siberia, could cover tundras normally blanketed in heat-reflecting snow.” It does not snow in the San Francisco Bay Area. Therefore, this statement does not apply to the San Francisco Bay Area.
- The article being quoted by the DEIR is NOT the scientific study, but rather a journalistic article in *The Guardian*, a newspaper in England, in which the author of the study has been misquoted and his study misrepresented.
- The day after this article appeared in *The Guardian* (and also in the *New York Times*), *The Guardian* published an op-ed (which also appeared in the *New York Times*) by the author of the scientific study, Ken Caldeira (Stanford University) in which he objected to the misrepresentation of his study:

“I was aghast to see our study reported under the headline “Planting trees to save planet is pointless, say ecologists.” (December 15). Indeed, our study found that **preserving and restoring tropical forests is doubly important**, as they cool the earth both by removing the greenhouse gas carbon dioxide from the atmosphere and by helping produce cooling clouds. We did find that preserving and restoring forests outside the tropics does little or nothing to help slow climate change, but nevertheless **these forests are a critical component of Earth’s biosphere and great urgency should be placed on preserving them.**” (Caldeira, 2006)

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As if this misrepresentation of the facts weren’t bad enough, we find in Appendix A of the DEIR that this isn’t the first time that someone has informed the authors of the DEIR that their statement is not accurate. One of the public comments submitted in 2009 in response to the Initial Study quoted Ken Caldeira’s op-ed in the *New York Times*. Yet, 2 years later, the DEIR repeats this misrepresentation of Professor Caldeira’s research.

Grassland does NOT store more carbon than forests.

The DEIR also claims that “Research studies have concluded that grassland and scrub habitat could act as a significant carbon sink.” (DEIR, page 457, citing Conant, Paustian and Elliot, 2001 and Hu, et al. 2001).

Once again, **the cited studies do not support the statement in the DEIR:**

- The statement has been taken out of context. The entire sentence reads, “We conclude that grasslands can act as a significant carbon sink **with the implementation of improved management.**” This sentence appears in the abstract for the publication. (Conant 2001)
- The point of the study is that land management techniques such as fertilization, irrigation, introduction of earthworms, plowing and fallow methods, etc., can improve the sequestration of carbon in the soil of croplands and pastures. This is obviously irrelevant to the Natural Areas Program, which is not engaged in agriculture or pasturage.

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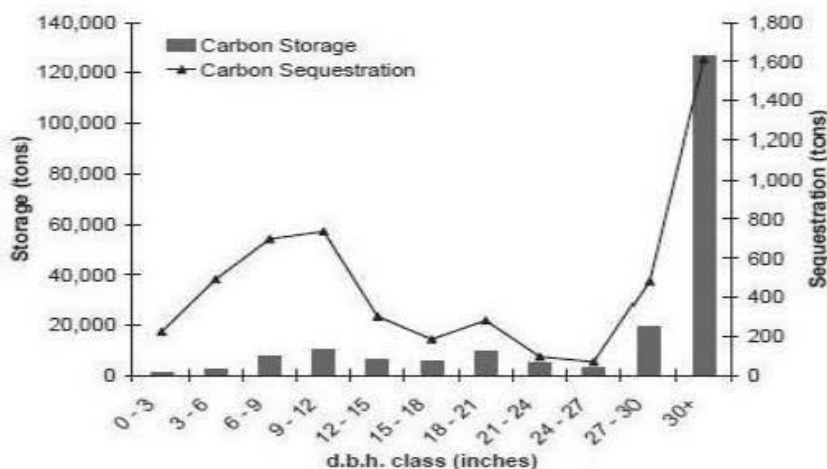
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- However, the study is relevant in that it reports that **when forest is converted to grassland, no amount of “management techniques” can compensate for the loss of the carbon in the trees that are destroyed**: “Though more than half of the rain forest conversion studies (60%) resulted in increased soil carbon content, **net ecosystem carbon balance...decreased substantially due to the loss of large amounts of biomass carbon.**” (Conant 2001)

The second study cited (Hu et al, 2001) in support of the claim about carbon storage in grassland reports that increased levels of carbon dioxide **in the air** increase carbon accumulation in the soil. This study says nothing about the relative merits of grasslands and forests with respect to carbon storage. Another study reports a relation between global warming and carbon storage in trees: “...warmer temperatures stimulate the gain of carbon stored in trees as woody tissue, partially offsetting the soil carbon loss to the atmosphere.” (Melillo, 2011)

The DEIR confuses the RATE of carbon sequestration with the total accumulated storage over the life of the tree.

The DEIR claims that because a young tree, growing at a faster rate than a mature tree, sequesters carbon at a faster rate than a mature tree, it follows that replacing mature trees with young trees will result in a net carbon benefit. This is NOT a logical conclusion, as illustrated by the following graph from the US Forest Service survey of San Francisco’s urban forest (Nowak, 2007):



This graph tells us that although trees sequester carbon faster when they are very small, the large, most mature trees are also sequestering carbon, and they store far more carbon than the smaller trees. This is as expected, because **the total amount of carbon stored within the plant or tree is proportional to its biomass, both above ground (trunk, foliage, leaf litter, etc.) and below ground (roots).**

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Even IF it were possible to replace the non-native trees with native trees – and it is NOT – the native trees would be significantly smaller than the trees destroyed. The few trees that are native to San Francisco are ALL small trees, compared to the larger species that would be destroyed. The NAP says that they have planted 8 species of native trees in the “natural areas” since 2008. Of those 8 species, only one (Red Alder) is classified as a tree by the USDA plant database. The other 7 species are classified as “tree/shrub,” indicating their small stature and low branching habit. Since the amount of carbon stored within the tree is proportional to its biomass, the native trees would never sequester as much carbon as the trees destroyed by the implementation of SNRAMP.

In its zeal to exonerate SNRAMP from releasing carbon stored in the trees it proposes to destroy, the DEIR contradicts itself. The SNRAMP proposes to destroy all non-native trees less than 15 tall, but these are the very same young trees that the DEIR says (inaccurately) are capable of sequestering more carbon than mature trees. If, indeed, the level of carbon storage could be maintained by a forest of exclusively young trees – and it CANNOT – what is the point of destroying all the young non-native trees?

The DEIR does not account for the loss of the carbon in the trees that will be destroyed.

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If we were starting with bare ground, it might be relevant to compare carbon sequestration in various types of vegetation. But we’re not: we are talking about a project that will require the destruction of thousands of non-native trees. Therefore, we must consider the loss of carbon associated with destroying those trees. **It doesn’t matter what is planted after the destruction of those trees; nothing will compensate for that carbon loss because of how the trees will be disposed of.**

The fate of the wood in destroyed trees determines how much carbon is released into the atmosphere. For example, if the wood is used to build houses, less carbon is lost than if the wood is allowed to decompose on the forest floor. Yet that the latter is what this project proposes to do: chip the wood from the trees and distribute it on the forest floor, also known as “mulching.” **As the wood decomposes, the carbon stored in the wood is released into the atmosphere as carbon dioxide.**

“Two common tree disposal/utilization scenarios were modeled: (1) mulching and (2) landfill. Although no mulch decomposition studies could be found, studies on decomposition of tree roots and twigs reveal that 50% of the carbon is lost within the first 3 years. The remaining carbon is estimated to be lost within 20 years of mulching. Belowground biomass was modeled to decompose at the same rate as mulch regardless of how the aboveground biomass was disposed” (Nowak et al, 2002)

Furthermore, the process of removing trees releases stored carbon into the atmosphere, regardless of the fate of the destroyed trees: “Even in forests harvested for long-term storage wood, more than 50% of the harvested biomass is released to the atmosphere in a short period after harvest.” (Anderson et al, 2008)

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The DEIR claims to have run a model of carbon loss resulting from the project in Sharp Park: “The model returns the CO₂ emission rates for all equipment deliveries, and worker activity involving on-road and off-road gasoline and diesel fuel use.” (DEIR, page 455). Yet the CO₂ emissions resulting from the destruction of 15,000 trees over 15 feet tall in Sharp Park is conspicuously absent from this analysis.

Managing the forest by thinning and reforestation does NOT compensate for the loss of carbon stored in the trees that will be removed.

The DEIR claims that improving the health of the urban forest by thinning and reforestation with young trees – which will NOT be physically possible – will result in a net benefit of carbon storage. In fact, more open canopy of an urban forest with less tree density results in greater growth rates (Environmental Protection Agency, 2010). Although more rapid growth is associated with greater rates of carbon sequestration, rates of storage have little effect on the net carbon storage over the life of the tree (Nowak 1997). **Net carbon storage over the life of the tree is determined by how long the species lives and how big the tree is at maturity. These characteristics are inherent in the species of tree and are little influenced by forest management practices such as thinning.** (Nowak 1997)

More importantly, even if there were some small increase in carbon storage of individual trees associated with thinning, this increase would be swamped by the loss of the carbon from the trees that will be destroyed.

As required by the California Environmental Quality Act (CEQA) and California Law AB 32, the final EIR must quantify the loss of carbon resulting from the destruction of thousands of healthy trees, compare that loss to the effect of the resulting vegetation (grassland and scrub), and mitigate for the net carbon loss that will inevitably result from implementation of SNRAMP.

III. Cultural Landscape and Recreational Resource

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The Historic Resource Evaluation Response (HRER) for the SNRAP confirms that Mt. Davidson Park is an historic landscape resource and potentially eligible for listing under the CA Register as an ethnographic landscape, but this study focuses primarily on the retaining wall and steps. A cultural landscape study is also required to address the significant historic resource created by the forest planted by Adolph Sutro, and how its existence led to the Easter sunrise event and the creation of a public park to protect the forest. This forest is also a significant part of the cultural landscape of the West of Twin Peaks District. Historic trails should be documented and preserved for public access in the SNRAMP. The cultural landscape study should be completed by a cultural landscape architect, as described in National Park Service Preservation Brief 36:

“Protection of Cultural Landscapes: historical research; inventory and documentation of existing conditions; site analysis and evaluation of integrity and significance; development of a cultural landscape preservation approach and treatment plan; development of a cultural landscape management plan and management philosophy; the development of a strategy for ongoing maintenance; and preparation of a record of treatment and future research recommendations.”

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The cultural landscape study should reference and consider the content of the pre-existing rating and survey report to the San Francisco Landmarks Board dated 2/5/1997 regarding the Mount Davidson Cross and Park, as follows.

“In San Francisco, where row-housing predominates and vegetation in any degree of positive impact – if existent at all – is found principally in shallow front yards or strips, or on the interior of blocks where it is screened from public view by allees of eucalyptus trees on the slopes of Mount Davidson. Below the summit itself nestle domestic architecture in a sustained garden-like setting which climbs ever higher to culminate in 32 acres of park-like wilderness. The simplicity of the monument is played artfully against the natural appearing surroundings. Its setting significantly contributes to the definition of the West of Twin Peaks locale.” (Section 11. Setting)

The cultural landscape study should also consider the analysis done in April 1991 by Marie Bolton for the City Attorney as part of the lawsuit regarding the cross at the summit of Mt. Davidson, “The Contemplative Ideal in a Public Space: The Cross at Mt. Davidson Park, San Francisco, 1923-1990.” Ms. Bolton documents that:

“On Feb. 23, 1910 members of the Sierra Club hiked into what was then called ‘the little wildernesses of the Sutro Forest,’ and held a ceremony renaming the peak in honor of George P. Davidson, who had been greatly respected for his incorruptibility as a surveyor and for his many contributions as a geologist, noted surveyor and naturalist, at the request of the Sierra Club.

“... The Sierra Club was supportive of the park because it was concerned about development, which threatened to obliterate the trees planted by Adolph Sutro ... In creating this park, the city was building on its earlier tradition of setting aside land for parks and recreational purposes ... At the dedication ceremony in 1929, three Monterey pines were planted to honor [Mayor Rolph, John McLaren, and Mrs. Edmund Brown].”

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The HRER is incorrect as to the date of the concrete cross construction. It was 1934, not 1929 (earlier wood crosses had been erected since 1923).

Bolton further documents:

“Decatur [the founder of the annual Easter sunrise event] described the ‘solitude of the forest’ on Mt. Davidson as conveying ‘a sense of vastness quite as real as one would experience among the age-old monarchs of the High Sierras’... Decatur was moved to make Mt. Davidson serve as a place of tranquility for the citizens of the Bay Area, a refuge from what was often seen in the 1920s and 1930s as the increasingly debilitating effects of city life.”

San Francisco is now has 100,000 more residents and plans to further increase the city’s residential density.

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The HRER conclusion that the SNRAMP project will not result in a substantial adverse changes to this historic cultural landscape and forest is based on incomplete analysis. The SNRAMP project will significantly negatively impact this historic forest because (1) Appendix J of the DEIR states that replacement trees can be planted anywhere in San Francisco, rather than in the Park or at the specific location of trees removed; (2) SNRAMP specifies replacement of trees removed with oaks rather than the historic forest species; and (3) it lacks any plan for restoring the remaining forest in the MA-3a zone as the existing historic species reach the end of their lifespan. Furthermore, the project map (see Exhibit A) indicates that areas where tree removal would be concentrated are the most visible areas as seen from **within the Park**, which is a major scenic and historic resource for Park visitors as well as residents of surrounding communities. Concentrated tree removal in these highly visible areas along major trails and sightlines within the Park will be very detrimental to enjoyment of the Park by its users. This goal is also inconsistent with historic Park uses and purpose. The purpose of the acquisition of the land by the City as a public park was to preserve the forest and provide for the recreation needs of the West of Twin Peaks District. A report to the Finance Committee of the Board of Supervisors dated 4/29/1927 confirms this:

“At the request of your Committee made at the last session, we are submitting herewith a report of such data as we have been able to get in reference to the Mount Davidson Park Project, together with our recommendations.

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(1) Purposes of Acquisition: As stated to your Honorable Committee at the last meeting the purpose of the proposed acquisition of lands on the summit of Mount Davidson is for a public park serving the needs of the West of Twin Peaks District and also serving as a recreation center and **forest play ground** for the whole city. **The acquisition will also preserve for all time the beautiful tree covered slopes of the mountain** as an attractive scenic land mark in the city and will help perpetuate the annual Easter Pilgrimage tradition.”

The HRER does not document the significance of what may be the first grass-roots campaign in San Francisco to preserve as a public park an area zoned for development. Led by Madie Brown and San Francisco’s Women’s Clubs, this campaign to preserve the area as a public park in 1926, was an example of the open-space movement that Richard Walker documents in his book *The City in the Country* (2008): “Out of 4.5 million acres in the 9-county region, more than 3.5 million are open space – thanks to a century-old environmental movement – primarily led by women ... Every acre of land and water has been fought for, often, in campaigns lasting years.” The campaign by Mrs. Edmund Brown and the Mt. Davidson Conservation Committee that began “when the subdividers’ axe and steam shovel were heard on Mt. Davidson’s lower slopes, destroying in ruthless fashion the beauties of nature,” took three years. The 4/26/1927 *Examiner* wrote an editorial in support of purchasing the land for park ... “As the residential area advances, **the forest** goes down before the axe. In another year, it will be too late for the beauty of the summit to be preserved...” The 6/24/1927 *Examiner* reported on the ground breaking ceremonies for the park and quoted the president of the West Park Association as pointing out that “the plan [at Mt. Davidson] is to **preserve as many of the trees as possible**.” The April 1928 issue of *The Municipal Employee*, a city publication, described the purpose of the campaign as: “to preserve for San Francisco this **wooded hill**, Mt. Davidson ...”

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The *San Francisco Chronicle* report on the dedication of the park on 12/9/1929 described how Mrs. Edmund Brown had researched the history of the site and

“brought to light the fact that the mountain was not always covered with **stately trees** ... it was but a barren, rocky hill ... [when] “part of the property owned by Adolph Sutro, Joaquin Miller, the poet who was enthusiastically planting trees on ‘The Heights’ in the east bay, envisioned the beauty that might be created by trees on the San Miguel Hills and suggested the plan to Sutro ... [who] planted thousands of tiny trees: cedars, pines, and eucalyptus.”

Richard Walker credits Joaquin Miller as being one of the first to promote preservation of the forests in the Sierra Nevada. The San Francisco Garden Club published vignettes of early San Francisco homes and gardens in December 1935. It quoted from the notes of Emma Sutro:

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“There is an account in Joaquin Miller’s Poetical Works of the first Arbor Day in San Francisco, celebrated on Nov. 27, 1886. The celebration was promoted by Joaquin Miller, Adolph Sutro, General Vallejo and General O. O. Howard ... Adolph Sutro, as his contribution to the first Arbor Day, gave 50,000 trees to be planted by the school children of Oakland and San Francisco. Climate has been modified and many a sandy bare monotone in San Francisco has been beautified by the massed dark accent of Mr. Sutro’s trees.”

Mount Davidson Park, among the last remnants in San Francisco of this historic forest that once extended from Ocean Avenue north to Mt. Sutro and was planted to celebrate CA’s first Arbor Day and to beautify the City, has been preserved in a City park. The forest has significant historical associations and defines the character of the surrounding neighborhoods. The size and age of the trees are significant and they provide a prominent landscape feature in West of Twin Peaks, especially for Miraloma Park residents. The experience of the forest led to initiation of the historic Easter sunrise event and the residents’ campaign to preserve it as public park. Without the forest, there would be no native plants left to protect and the land would be covered with housing. The forest in Mount Davidson Park meets most criteria for protection by the Landmark Tree Ordinance: visual, cultural, ecological, and locational characteristics. The Recreation and Parks Department should fulfill its stewardship responsibility and recommend to the Urban Forestry Council designation of the 30.1 acre forest in Mt. Davidson Park for Landmark status.

A structural engineer should evaluate the historic retaining walls before embarking on the 2008 Park Bond work planned for this area. The HRER notes that the mature vegetation growing on these walls and stairs is historic. The trees along these features should therefore be protected. The forest is also holding the steep slopes of Mt. Davidson intact. The DEIR on page 219 acknowledges that extensive erosion control structures would create an additional substantial adverse impact on this cultural resource. Whether these structures would be necessary if the concentrated tree clearing is implemented should be addressed in the EIR.

IV. Erosion

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As acknowledged in the SNRAMP, the urban forest on the western portion of Mt. Davidson Park has steep slopes, with groundwater seep at the base of the outcrop. There is also substantial groundwater seep or underground stream/aquifer runoff during heavy rain storms on the southern

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slope, which drains onto adjoining properties. Many homes have had to build channels for the run-off in their basements and garages to prevent flooding of their homes. The SNRAMP further acknowledges that the heavy vegetation cover in many areas aids in preventing trail and slope erosion. The SNRAMP is incorrect in stating that all erosion and soil issues relate to the trail system and public use. This may be the case now, but the proposed concentrated tree removals will likely result in much more significant erosion and soil issues, potentially creating conditions for landslides onto abutting properties.

In 1998, native plant activists removed stands of French Broom from the bottom of the eastern slope of the Mt Davidson. As 1998 was an el Niño year, subsequent rains carried the upper layer of dirt and rock, no longer anchored by roots, into the back patios and homes of those living adjacent to the park, endangering life, damaging property, and resulting many thousands of dollars in costs for some home owners. A USGS assessment stated that, although the area is seismically sound, the bedrock and shale of the steep mountainside has a 4 to 7 foot deep layer of loose matter, which is liable to slide under some conditions – as when the topsoil is not anchored. The current vegetation has proved sufficient to prevent this. Grass and brush will not provide the same safeguard. Were the mountain whole and uninhabited, this would be of no great concern, but the construction of the forties and the fifties terraced the hills, cutting into the bedrock and leaving the top strata unsupported, creating conditions favorable to a minor landslide like the deadly and destructive 1942 Foerster slide, which occurred below an area of native grasses.

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The DEIR should include a requirement for detailed soils and geologic surveys and analyses of the MA-1 and MA-2 zones by a qualified engineer with respect to the SNRAMP project plan before any tree removal would be allowed. The DEIR's conclusion that the substantial erosion and siltation that could occur from the tree removal could be mitigated is based on insufficient analysis of the actual geology and hydrology of Mt. Davidson Park. This proposed removal of the heavy vegetation there now would substantially increase storm water and groundwater runoff from the steep slopes of the park and cause a significant adverse impact on adjoining properties. Limiting the mitigation to revegetation with grasses in lieu of the tree roots and thick shrubs there now would likely not be sufficient to prevent such adverse effects. More expensive and extensive mitigation may be required, such as retaining walls and other structures, unless the proposed level of tree elimination is substantially reduced.

The DEIR claims that increased run-off and erosion will be prevented by revegetating areas in which non-native plants and trees are eradicated. **This claim is based on these erroneous assumptions:**

- **That native plants will quickly occupy the bare ground on which they are planted.**
In the 15 years in which the NAP has been engaged in its enterprise, it has not successfully vegetated the bare ground created by eradicating non-native plants and trees. Denuded areas are quickly occupied by annual grasses that die back to leave bare ground during the dry season.
- **That grassland and dune scrub and non-native trees are equally capable of absorbing run-off and stabilizing soil.**

This assumption is contradicted by the following scientific studies:

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- “Results indicate that **smoothing of precipitation intensities may translate into overall greater stability of hill slopes under forest canopies**. In general, peak intensities of through-fall were damped in intensity and lagged in time relative to peak intensities of rainfall. Damping and lagging of rainfall intensity at both study sites generally increased modeled slope stability relative to openings (areas with no canopy).” (Keim & Skaugset 2003)
- “The **reinforcement of the main body of a dike by a grove of trees is much higher** and effective in comparison to the reinforcement of the top soil layer by a grass sward. The increase in stability against landslides was found to be least ten times higher.” (Lammeranner & Meixner 2009)

Leaving tree stumps in the ground will **not** prevent erosion.

The DEIR claims that the removal of trees will not result in erosion because: “...tree removal would be selective, would be implemented gradually over several years, would involve limb-by-limb removals, and would leave tree stumps and root balls intact.” (DEIR, page 364) These claims are inconsistent with SNRAMP, incredible, and/or contradicted by scientific studies:

- As we have already discussed, trees have been selected for removal by SNRAMP in large groups wherever they shade native plants. Some of these groups are as large as 1,000 trees on 3.5 acres of Mt. Davidson. Such removals cannot be accurately described as “selective.”
- It is simply not believable that 18,500 large trees will be removed “limb-by-limb.” What public entity would ever be in a position to pay for such a laborious removal? Nor is it believable that 18,500 trees will be taken down piecemeal over a long period of time. This would be both physically difficult and prohibitively expensive.
- **Leaving “tree stumps and root balls intact” does not prevent erosion. There is considerable scientific evidence that erosion results when the roots die:**
 - “The immediate effect of deforestation is, therefore, favorable, but adverse effects become evident when root systems decay and when a drop in evapo-transpiration causes a rise in the ground water table.” (Brown & Sheu, 1975)
 - “Measurement of the decline in tensile strength of small roots in coastal British Columbia after death of the parent tree indicates that over half the strength is lost within 3 to 5 years after cutting.” (O’Loughlin, 1974)
 - “Soil strength increased linearly as root biomass increased. Forests clear-felled 3 years earlier contained about one-third of the root biomass of old growth forests.” (Zeimer, 1981)
 - “Decay of tree roots subsequent to logging was found to cause a reduction in the shear strength of the soil-root system.” (Wu, McKinnell & Swanston, 1979)

The DEIR’s assumption that increased run-off and erosion will not result from the implementation of SNRAMP does not take into account that **the potential for both run-off and erosion are significantly increased by the steepness of slope**. Some of the planned tree removals will occur in very steep terrain:

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Tree Removal As Related to MA Area and Terrain

Natural Area	MA	Tree Removals	% Trees Removed	% Slope*
Interior Greenbelt	MA-2a	100	28%	67%
Mt. Davidson	MA-1c	1,000	82%	40% - 67.5%
	MA-2c	200	31%	33% - 90%
	MA-2e	400	23%	20% - 70%
Bayview Hill	MA-2a	70	32%	55.6%

*Determined by using topographical maps in SNRAMP for each natural area

These are only examples of the steepness of slopes in many of the natural areas. The EIR should be morally and legally obligated to evaluate the steepness of all of the natural areas in the context of the potential for increased run-off and erosion resulting from the removal of non-native trees.

The potential for increased run-off and erosion is greatly increased by steep slopes. The DEIR has not considered that many of the planned tree removals will occur in very steep locations. Some of these locations are directly uphill from densely populated residential neighborhoods, which would be in the direct path of both run-off and landslides caused by erosion. Yet, the risks to these residential neighborhoods have not been considered by the DEIR. The residential neighborhoods surrounding Mt. Davidson are particularly vulnerable to increased run-off, erosion and landslides.

On 5/23/2012, the State of California sued the US Army Corps of Engineers to challenge a national policy "requiring the removal of virtually all trees and shrubs on federal levees." (<http://cdfgnews.wordpress.com/2012/05/23/dfg-sues-army-corps-to-protect-fish-and-wildlife-around-levees>) Donald H. Gray, Professor of Civil and Environmental Engineering at the University of Michigan, provides the following explanation for why California is fighting this federal requirement:

"In the long run, cutting of trees on slopes leads to a gradual decrease in mass stability as a result of the decay of roots which previously acted as tensile reinforcements on the slope. Root decay can also lead to the formation of pipes in slopes, which promote internal or seepage erosion. The removal of tree canopy results in the loss of interception and evapotranspiration, which tends to promote wetter and less secure slopes. Canopy removal also results in less attenuation in the delivery rate of rainfall to the ground surface." (ftp://136.200.241.91/outgoing/FMO/Veg_on_Levees/Literature%20Reviews/Effects%20of%20Tree%20Removal.pdf)

The City and County of San Francisco should consider the implications of this suit. If the State of California is willing to sue to keep trees on its levees in order to prevent erosion and flooding, what are the prospects that the City and County of San Francisco can successfully defend itself against a legal challenge to its plans to remove 18,500 mature trees from the parks managed by the City of San Francisco?

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The final EIR must evaluate the risk of increased run-off, erosion and landslides. It must substantiate, using scientific studies, the DEIR's baseless claims that the removal of thousands of trees will not increase this risk. If the final EIR cannot provide scientific evidence that these tree removals will not increase these risks, it must mitigate these risks by decreasing plans for tree removal in natural areas where these risks are great because of steepness and/or the proximity of residential properties potentially endangered by the tree removals.

IV. Aesthetics

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While the DEIR acknowledges that Mount Davidson has high natural resource and recreational values for the citizens of San Francisco, including City views, high levels of recreational use, and extensive urban forest, the conclusion that the SNRAMP would have less than significant impact on scenic vistas is incorrect. The DEIR on page 190 states "While the one-to-one replacement ratio would not increase the total trees present ... in some locations, trees would be replaced by native scrub or grassland species." This is inconsistent with statements with Table 5, Page 114, and SNRAMP Appendix F page 14 that list a net loss of at least 1600 trees.

In addition to the many references to the importance of beauty as a rationale for saving the forest in the previous section on the history of the park, of crucial concern is not only the impact on views of the forest from outside of the park—pictured on page 193-194 of the DEIR – or the impact on distant views to and from the Park, but the **view and experience of the historic forest up close from within the Park by park visitors**: along the trails, roads, and historic monuments within the MA-1 and MA-2 areas, where substantial tree removal is proposed. This concentrated tree removal, up to 82% of the area around the plateau, road, and Juanita trail, will be extremely noticeable. This impact is significant and should be acknowledged in the final EIR, or the scope of the tree removal should be reduced to prevent this adverse effect on the aesthetic experience inside the forest area of the park.

Tree topping and removal from the MA-1c and MA-2e areas has already resulted in unsightly stumps, remnants, and debris along the most accessible and visible areas in the park, which substantially degrade the visual character of this public park. (See Exhibit B attached). The MPIC requests that any trees killed for SNRAMP be totally removed—all the way to the ground—so that no unsightly stumps are left to negatively impact the aesthetic view from within the park. As demonstrated above, the DEIR's argument that leaving the trunks will help stabilize the slopes is a scientific fallacy. Also, to date non-native vegetation and tree parts removed by City staff have been left in unsightly debris heaps along the public trails. This significantly negatively impacts the Park as a scenic resource for those wishing to enjoy the beauty of nature along the Park trails. The MPIC requires that the debris created by the SNRAMP maintenance work be collected and dumped away from public view or removed from the park all together.

V. Recreational Use

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The DEIR notes that Mt. Davidson Park has high recreational value and trail use by the citizens of San Francisco. The park was originally created for recreational purposes. The SNRAMP proposal subordinates the recreational purposes for which the park was created to conservation

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18 (Cont.) [and restoration goals, which is a significant change in the purpose of the park that will negatively impact park uses.

19 [The DEIR does not address the fact that, as demonstrated by tree removal to date, the project tree removal plan will foster the invasive growth of native poison oak, and does not describe how this significant negative impact on Park visitors will be mitigated. Where trees have been removed thus far, we have seen a significant increase in poison oak, often along hiking trails, and we believe this proliferation of poison oak will increase substantially as more trees are removed. The MPIC reiterates its request for the project plan to include a policy to keep poison oak at least 10 feet away from all trails at all times.

20 [The DEIR also does not address how SNRAMP will limit dog access, whether recreational amenities such as benches will be disallowed, or which trails will be closed in the MA-1 and MA-2 areas. The planned limitation of access in the MA-1 and MA-2 areas of the park would significantly negatively impact recreational experience of this important park area for residents of the West of Twin Peaks District. There is now only one bench in Mt. Davidson Park, and for full enjoyment by recreational users additional benches should be allowed and installed throughout the Park, including MA-1 and MA-2 zones. The EIR should be explicit about what is meant by passive recreation – e.g., does this mean no benches, picnic tables, trashcans, significantly fewer trails in these “native plant” zones – and should analyze the impact of such prohibitions on these recreation facilities most park users would consider to be part of passive recreation.

Because the one trashcan previously in place at the summit of Mt. Davidson has been removed, litter is often left where this trashcan used to be. The EIR should be explicit in stating that the SNRAMP means that there will be no trash cans or litter pick-up in the park and should address the impact of this policy on the aesthetic experience of the park.

21 [Which trails will be closed and how dog access will be limited in the park are not clearly stated in the SNRAMP, and are therefore inadequately evaluated in the DEIR. The EIR should answer these questions so the public can truly be informed as to the impact of these plans on recreation.

VI. Noise Pollution

22 [The forest in Mt. Davidson Park acts as a significant sound barrier. The DEIR addresses the noise-pollution impact anticipated from the actual tree clearing to residents adjacent to the park. However, the DEIR does not address the MPIC’s concern that tree removal will result in a substantial, permanent increase in ambient noise levels heard by visitors **within the park**. The nearby 280 freeway, BART, and Portola Drive are substantial sources of noise currently partly mitigated by trees slated for removal. The final EIR should compare sound readings within the MA-1a area with those in the MA-3a areas to demonstrate the impact of MA-1c and MA-2c area tree removal on noise levels along the Park road and trails surrounding the summit of the mountain.

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VII. Pesticides and Herbicides

The DEIR for the SNRAMP claims that herbicides/pesticides required to implement SNRAMP will not have a significant impact on the environment. It reaches that conclusion by providing inadequate and inaccurate information about the use of herbicides by the NAP in the present and by providing no information about the requirements for more herbicides in the future to kill the roots of thousands of trees that will be destroyed:

- The DEIR provides no information about the frequency of use of herbicides by the NAP.
- The DEIR claims that herbicide applications by the NAP comply with San Francisco's Integrated Pest Management (IPM) Ordinance. In fact, public record contain considerable evidence that herbicide applications by the NAP frequently violate San Francisco's IPM Ordinance.
- The DEIR misstates the facts about the toxicity of the herbicides being used by the NAP.
- The DEIR provides no information about the increased use of herbicides that will be required to prevent the resprouting of the trees that will be destroyed by the implementation of SNRAMP.

Herbicide use by the NAP

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The DEIR provides no information about the volume of herbicides used by the NAP. The sole sentence in the DEIR pertaining to volume of use of herbicides is this: "In 2004, the Natural Areas Program accounted for less than 10 percent of the overall SFRPD pesticide use, even though the Natural Areas account for approximately 25% of the land managed by the SFRPD." (DEIR, page 365) This statement provides inadequate information regarding NAP's pesticide use because it is 8 years out of date. Because we aren't informed by the DEIR of the volume of SFRPD's pesticide use, we are unable to determine the volume of NAP's pesticide use, i.e., NAP's pesticide use is 10% of WHAT?

The claim that NAP's pesticide use is only 10% of total RRPD pesticide use – if in fact that is true – is not reassuring. The public has good reason to expect that parks designated as "natural areas" should contain less pesticide than other park areas, such as golf courses, lawns, flower gardens, and landscaped areas.

Based on public records requests (see Attachment A), we have the following information about the number of pesticide applications by the NAP:

Number of Pesticide Applications by the Natural Areas Program

Active Ingredient	Year			Increase from 2008 to 2010
	2008	2009	2010	
Triclopyr (Garlon)	17	16	36	212%
Glyphosate (Roundup)	7	6	31	443%
Aminopyralid/Imazapyr	2	2	2	0%
Total	26	24	69	265%

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(Cont.)

We learn from these official reports of NAP's pesticide use, which are required by the City's IPM Ordinance, that NAP's pesticide use has increased 265% since 2008. Therefore, the only information provided by the DEIR regarding NAP's pesticide use is inadequate and inaccurate because it is 8 years old and pesticide use by the NAP is increasing significantly from year to year, 265% in the past 3 years alone.

From these official reports of NAP's pesticide use it is evident that several other statements in the DEIR are inaccurate. The DEIR claims that "Garlon is being phased out from use in Natural Areas and is only used for invasive plants in biologically diverse grasslands due to its target specificity." (DEIR, page 365) However, according to the official reports of NAP's pesticide use, Garlon (active ingredient Triclopyr) was used more often than any other pesticide in all 3 years, including the most recent year. This FACT is inconsistent with a claim that Garlon is being "phased out."

The statement that Garlon is "only used for invasive plants in...grasslands" is contradicted by this statement in the DEIR: "Treatment of tree stumps with San Francisco-approved herbicides (such as Roundup and Garlon) (DEIR, page 386) The DEIR claims that Glyphosate is the "primary product used." (DEIR, page 365). This statement is inaccurate. Official reports of NAP's pesticide use prove that Triclopyr was used more often than Glyphosate in all 3 years for which we have data.

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Herbicide use by the Natural Areas Program frequently violates San Francisco's IPM Ordinance
In lieu of providing any information about the actual use of pesticides by the Natural Areas Program, the DEIR claims that the mere fact that these pesticide applications comply with San Francisco's IPM Ordinance ensures that there will be no significant impact on the environment from its pesticide use: "Pesticide use...would adhere to the IPM Program. As a result, water quality impacts from herbicide and pesticide use as part of programmatic projects would be less than significant." (DEIR, page 365)

There are two problems with this claim:

NAP has been granted exceptions to the IPM Ordinance to use toxic chemicals that are not used by other agencies in San Francisco: Imazapyr and Triclopyr.

- Garlon (Triclopyr): Tier I, Most Hazardous. Use Limitation: "Use only for targeted treatments of high profile or highly invasive exotics via dabbing or injections. May use for targeted spraying only when dabbing or injections are not feasible and only with use of a respirator. HIGH PRIORITY TO FIND ALTERNATIVE." (San Francisco IPM policy 2011)
- Habitat (Imazapyr): Tier II, More Hazardous. Use Limitation: "Preferred alternative to triclopyr for use on invasive weeds in natural areas such as broom, cotoneaster, or Arundo grass." (San Francisco IPM policy 2011)
- Even after having been granted these exceptions, NAP has frequently violated the IPM Ordinance. Many of these violations have been reported to the Department of the Environment by the public and are therefore a part of the public record:

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- NAP's reports of pesticide use are frequently incomplete: targets for applications, locations of applications, etc., are frequently missing from NAP's reports (see Attachment A).
- We have photographs of notices of pesticide applications for which there are no corresponding entries on the official record of pesticide use maintained by the Department of the Environment. This suggests that the official reports of NAP's pesticide use are not complete. These photographs have been sent to the Department of the Environment.
- The NAP's notices of pesticide application are frequently missing the date of application, thereby making it impossible for the public to know when the area is safe to enter. Photographs of these incomplete notices have been sent to the Department of the Environment.
- The NAP used Imazapyr in 2008 and 2009, prior to its approval for use by San Francisco's IPM policy in 2011.
- The NAP **sprayed** Garlon (Triclopyr) prior to 2011 when only "dabbing and injection" were approved application methods by the IPM policy.
- The NAP sprayed Garlon (Triclopyr) in 2011 without using a respirator, as required by the IPM Ordinance in 2011 (see Attachment B).
- The NAP sprayed herbicides containing glyphosate in the water of Lake Merced, which is officially designated red-legged frog habitat, in violation of US Fish and Wildlife regulations which ban the use of many herbicides, including glyphosate, from designated habitat for red-legged frogs and other endangered amphibians.
- Volunteers working in the natural areas are not authorized to use herbicides because they have not been trained and do not have the proper equipment with which to safely apply herbicides. Some of these unauthorized volunteers have been seen spraying herbicides without posting the required notification of pesticide application. These incidents have been reported to the Department of the Environment.

The DEIR makes inaccurate statements regarding the toxicity of the pesticides used by the Natural Areas Program.

The DEIR contains little information regarding the toxicity of the pesticides being used by the Natural Areas Program. What little information it provides is entirely inaccurate, e.g.: "*Garlon+ degrades quickly in the environment and has low toxicity to aquatic species (Dow, 2009)." (DEIR, page 365)

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Following are accurate statements regarding Garlon's biodegradability and toxicity to aquatic life quoted directly from the Material Safety Data Sheet mandated by the federal government and prepared by the manufacturer of the product (Dow) based on laboratory studies conducted by the Environmental Protection Agency also mandated by federal law (see Attachment C):

- "Persistence and Degradability: Chemical degradation (hydrolysis) is expected in the environment. **Material is expected to biodegrade only very slowly (in the environment). Fails to pass OECD/EEC tests for ready biodegradability.**" (emphasis added)

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- “Ecotoxicity: **Material is highly toxic to aquatic organisms** on an acute basis...”
(emphasis added)

The DEIR’s flagrant misrepresentation of the toxicity of Garlon is appalling. The DEIR contains no accurate information about the toxicity of any of the pesticides used by the NAP. In the only case in which it provides any information, this information is completely inaccurate.

The DEIR provides no information about the increased use of pesticides that will be required to implement the SNRAMP

The DEIR’s claim that the NAP’s herbicide use will have no significant impact on the environment is apparently based on historic data from 2004 (which the DEIR does not share with the reader) and on an assumption that historic use was in compliance with San Francisco’s IPM Ordinance. As we have shown, data from 2004 does not describe NAP’s present use, NAP is granted exceptions for most of its pesticide use, and NAP has a substantial public record of violating IPM policy.

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However, the DEIR is supposed to evaluate the environmental impacts of implementing the SNRAMP. It is therefore obligated to look forward, not backward. The DEIR says nothing about NAP’s use of herbicides in the future as a result of the implementation of the SNRAMP. This is a very important failing, because destroying thousands of trees will require the use of more pesticides. Most of the non-native trees destroyed will re-sprout if their trunks are not sprayed immediately with Garlon. This initial application of Garlon is often insufficient to kill the roots of the tree. Repeated applications are often required to kill the roots of the tree.

The DEIR acknowledges the need to use Garlon on the stumps of trees that have been destroyed: “Treatment of tree stumps with San Francisco-approved pesticides (such as Roundup and Garlon)” (DEIR, page 386) However, the DEIR provides no information about how much more pesticide must be used as a result of destroying thousands of non-native trees. UC Berkeley has been clear-cutting all non-native trees from its properties for over 10 years. Several years ago it applied for grant funding from the Federal Emergency Management Agency (FEMA) to continue its eradication of all non-native trees from its property. It submitted a letter with its application to FEMA (obtained using a Freedom of Information Act [FOIA] request) to document the cost of poisoning all of the stumps of the trees with Garlon, which it predicts must be done twice per year for 10 years (see Attachment D). Both UC Berkeley and the East Bay Regional Park District are on record in their “vegetation management plans” as stating that Roundup is not capable of preventing resprouting of trees. Garlon is the only pesticide known to be effective for this purpose. The Material Safety Data Sheet documents that Garlon is a “Hazardous Chemical” which is very toxic to aquatic life, slightly toxic to birds, and biodegrades slowly in the environment (see Attachment C).

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Conclusions Re Pesticide Use

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The final Environmental Impact Report for the SNRAMP must:

- Provide specific and current data about herbicide use by the NAP
- Provide accurate information about the toxicity of the herbicides being used by the NAP
- Quantify, evaluate, and mitigate the increased herbicide use that will be required as a result of destroying thousands of trees that will re-sprout unless their stumps are treated with pesticides.

If this information is provided in the final EIR it will be unlikely that the EIR could make a believable claim that there will be no significant impact on the environment resulting from the implementation of the SNRAMP. The animals that live in our parks and the humans who visit them deserve the mitigation required to ensure their health and safety. Furthermore, CEQA law requires such mitigation.

VIII. Wildlife Habitat

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The forest in Mt. Davidson Park provides important wildlife habitat. Claims that habitat for animals is improved by the eradication of non-native plants are unsupported by scientific evidence.

The DEIR states repeatedly that habitat will be improved by the eradication of non-native plants and their presumed replacement by native plants. This statement is offered support for most claims in the DEIR that the “restoration” project will not harm the environment. For example, although the DEIR acknowledges that the environment may be harmed by the methods used to eradicate non-native plants, it maintains that this harm will, theoretically, be mitigated by the eventual development of native habitat that will compensate for that harm. This claim is not supported either by the reality of restoration efforts in the past 15 years or by scientific evidence, which does not substantiate a claim that native vegetation provides superior habitat for animals than non-native vegetation.

Although non-native vegetation has been removed repeatedly in many natural areas, the native plants that are planted in their place rarely persist for longer than a few months. These newly planted areas are quickly over-run by non-native weeds. More importantly, neither SNRAMP nor the DEIR provide any scientific evidence to support the contention that native vegetation provides superior habitat for animals. In fact, all available scientific evidence contradicts this claim. Eucalyptus trees are one of the primary targets for eradication because of claims that the eucalyptus forest is a “biological desert,” that “nothing grows” under eucalypts, and that they provide neither food nor habitat to insects, birds, and other animals. Professor Dov Sax (Brown University) tested these claims while a student at UC Berkeley. **He compared the eucalyptus forest in Berkeley with native oak-bay woodland in the same location and found little difference in species frequency or diversity in these two types of forest.**

Sax studied 6 forests of about 1 hectare each, 3 of eucalypts and 3 of native oaks and bay trees. The sites were not contiguous, but were of similar elevation, slope, slope orientation, and type of

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adjacent vegetation. Inventories in spring and autumn counted species of plants and in the understory and insects in samples of equal size and depth of leaf litter, as well as amphibians, birds, and rodents.

“Species richness was nearly identical for understory plants, leaf-litter invertebrates, amphibians and birds; only rodents had significantly fewer species in eucalypt sites. Species diversity patterns ... were qualitatively identical to those for species richness, except for leaf-litter invertebrates, which were significantly more diverse in eucalypt sites during the spring.” (Sax, 2002)

Sax also surveyed the literature comparing biodiversity in native versus non-native forest and reported similar findings for comparisons between non-native forests and local native forests all over the world:

- In Spain, species of invertebrates found in the leaf-litter of eucalyptus plantations were similar to those found in native forests, while species richness of understory plants was greater in the native forests.
- In Ethiopia, the richness of understory species was as great in eucalyptus plantations as in the native forest.
- In Michoacán, Mexico, species richness and abundance of birds were similar in eucalyptus and native forests.
- In Australia, species richness of mammals and of soil microarthropods were similar in native forests and in non-native forests of pine.

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(Cont.)

The only caveat to these general findings is that fewer species were found in **new** plantations of non-natives less than 5 years old. This illustrates a general principle that is often ignored by native plant advocates, that **nature and its inhabitants are capable of changing and adapting to changed conditions**. Non-native forests in the San Francisco Bay Area have been here for over 100 years. The plants and animals in our forests have “learned” to live in them long ago.

Wildlife does not necessarily benefit from native plant restorations and sometimes is harmed by them. The assumption that native animals are dependent upon native plants underestimates the ability of animals to adapt to changing conditions. Art Shapiro (UC Davis), who has studied California butterflies for over 35 years, has observed along with other scientists that

“...the extensive adoption of introduced host plants has clearly been beneficial for a **significant segment of the California butterfly fauna**, including most of the familiar species of urban, suburban and agricultural environments. Some of these species are now almost completely dependent on exotics and would disappear were weed control more effective than it currently is.” (Graves & Shapiro, 2003)

Shapiro explains that this is particularly true on the coast of California, where the highest concentration of introduced species of plants is naturalized and the butterfly population is less diverse because of the cool, foggy climate. There are fewer non-native plants in the desert and alpine regions of California, so butterflies in those regions have not had the opportunity or the need to adapt to new plants.

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Shapiro speculates in this study that **other insects have adapted to non-native plants as well:** "Introduced hosts, having a broader geographic range than native hosts, may permit the expansion of the insect population geographically."

The non-native blackberry provides cover for much wildlife. It is an impenetrable bramble both physically and visually. Birds and small mammals hide and make nests and dens in these thickets. Coyotes are resident in San Francisco. The thick undergrowth removed in some parks by the NAP now allows unleashed dogs to pursue coyotes in areas where they were protected before. If the safe havens of urban wildlife are destroyed, the animals may seek shelter elsewhere, a move that may be dangerous for them.

Birds have adapted to non-native plants and trees. Researchers at UC Davis (Aslan & Rejmanek, 2010) surveyed over 1,000 ornithologists in 4 states, including California, about their observations of native birds and non-native plants. Reports from 173 ornithologists included 1,143 "interactions" of birds with introduced plants considered invasive. Of those interactions, 47% were birds eating the fruit or seeds of non-native plants and trees considered invasive. Other interactions included nesting, perching, gleaning [eating insects], etc. Interactions were frequently reported in non-native blackberry, found in most parks in San Francisco, and one of the most productive food sources for birds in San Francisco. Unfortunately, it is being eradicated by the Natural Areas Program because it is non-native.

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Mt. Davidson currently has a large and healthy distribution of birds (114 species found from 5/31/11 - 6/1/12; see Attachment E), 90% of which rely on trees and forest for food, safety, and a place to breed. Because of the nature of their current habitat, none of the species present on Mt. Davidson are threatened or of special concern. The data presented in table 6-2-2 (Sensitive species known to occur at Mount Davidson) of the SNRAMP is incorrect. No empirical data were used and cited in the conclusions of the DEIR. Bird information cited were opinions submitted by the Golden Gate Audubon Society, an amateur lobbying group located in Alameda County that is known to have special interests.

No explanation is provided of the term "Species of Local Concern (SLC)" used in Table 6-2-2. Does the Federal and State or local government recognize this as a legitimate and legal conservation status? None of the 18 species listed in table 6-2-2 is considered either threatened or endangered by Federal, State, or local authorities or experts. All of the 18 species are listed as "Species of Least Concern" by the International Union for the Conservation of Nature (IUCN). San Francisco Field Ornithologists (SFFO), an organization that collects and publishes data about local birds, considers nine of the birds listed in table 6-2-2 as "seen on most bird outings." The other ten species are described as "common; abundant; expected to be seen on every outing in moderate or large numbers." If Table 6-2-2 is meant to convey the impression that birds are doing poorly in the current environment of Mt. Davidson, it fails to demonstrate this factually. On the contrary, Mt. Davidson hosts a habitat where birds are not threatened but live and prosper in abundance.

Native plant restorations also require the use of herbicides to eradicate non-native trees and plants. Herbicides are being sprayed on blackberries and other berry-producing non-native plants that are a major food source for wildlife. **One study performed by the US Forest**

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Service for the EPA reported that the use of Garlon significantly reduced the reproductive success of birds (Marin Municipal Water District).

There is a current and local example of scientific evidence that native plants do not provide habitat that is superior to that provided by non-native plants. The California Academy of Sciences found that several years after planting its roof with native plants this roof is now dominated by non-native species of plants in the two quadrants that are not being weeded, replanted, and reseeded with natives. **Their monitoring project recently reported that there were an equal number of insect species found in the quadrants dominated by native plants and those dominated by non-native plants.** Where equal numbers of insects are found, we would expect to find equal numbers of birds and other animals for which insects are food. The final EIR cannot reassure the public that the implementation of SNRAMP will not harm wildlife because the NAP has already violated the laws that theoretically protect wildlife. The final EIR must prohibit the use of herbicides known to be harmful to butterflies on Twin Peaks, where the endangered Mission Blue butterfly has been reintroduced by the Natural Areas Program.

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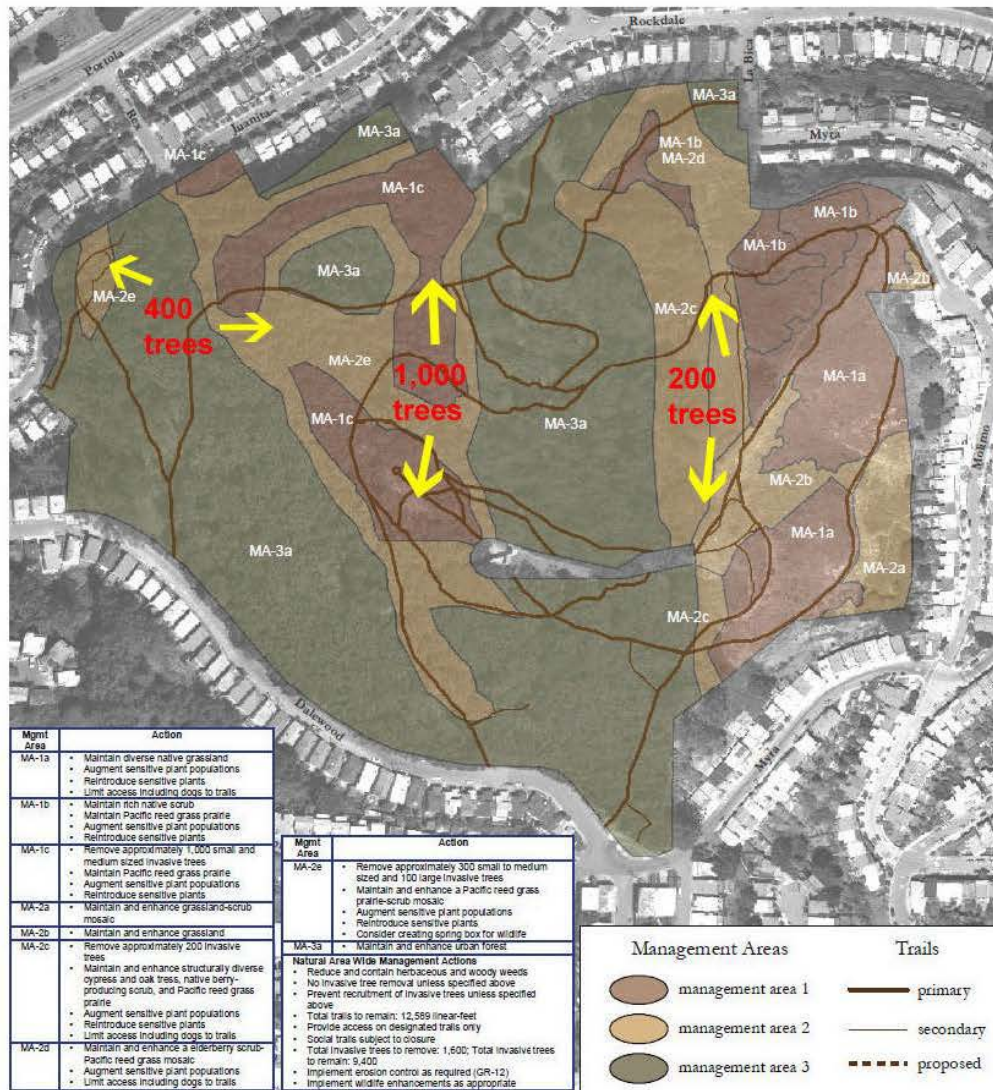
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EXHIBIT A. Plan Map



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EXHIBIT B. Unattractive Tree Maintenance by the Natural Areas Program



ATTACHMENT A. PESTICIDE APPLICATIONS 2008-2010

APPLICATION NUMBER	Application Comments	PESTICIDE	Amount Used	Units Used	TARGET PEST	EPA Number	HOW APPLIED	APPLICATOR
GARLON								
17642	Monocot city	GARLON 4	2	fl.ozs.	broadleaf weeds	62719-40-ZB-62719	Spray	DE MEO, LICIA
17643	Poison Oak / Oxalis	GARLON 4	2	fl.ozs.	broadleaf weeds	62719-40-ZB-62719	Spray	HAYES, DYLAN
17699	pine lake	GARLON 4	1.8	fl.ozs.	cape ivy	62719-40-ZB-62719	Spray	HAYES, DYLAN
17700	bayview hill	GARLON 4	13.2	fl.ozs.	cape ivy	62719-40-ZB-62719	Spray	HAYES, DYLAN
17701	twin peaks	GARLON 4	5.4	fl.ozs.	oxalis	62719-40-ZB-62719	Spray	annese ZEBELL, RANDOL (RANDY)
17761	east grassland	GARLON 4	8	fl.ozs.	oxalis	62719-40-ZB-62719	Spray	CAMPBELL, CHRISTO
17762	twin peaks	GARLON 4	21.6	fl.ozs.	oxalis	62719-40-ZB-62719	Spray	CAMPBELL, CHRISTO
17763	mt. Davidson	GARLON 4	18	fl.ozs.	oxalis	62719-40-ZB-62719	Spray	ZEBELL, RANDOL (RANDY)
17764	Glen canyon	GARLON 4	10	fl.ozs.	oxalis	62719-40-ZB-62719	Spray	DE MEO, LICIA
17765	Mc Laren Quail run	GARLON 4	10	fl.ozs.	oxalis-burclover	62719-40-ZB-62719	Spray	ANNESE, THOMAS (
17883		GARLON 4 ULTRA	2	fl.ozs.	stumps	62719-527	Spray	
18121		GARLON 4 ULTRA	7.5	fl.ozs.	weeds	62719-527	Spray	
18122	Mt. Davidson	GARLON 4 ULTRA	10	fl.ozs.	stump treatment	62719-527	Spray	
18123	Mt. Davidson	GARLON 4 ULTRA	30	fl.ozs.	stump treatment	62719-527	Spray	
18124	sharp park	GARLON 4 ULTRA	12	fl.ozs.	stump treatment	62719-527	Spray	
18125	ggp/ow	GARLON 4 ULTRA	12	fl.ozs.	stump treatment	62719-527	Spray	
18160		GARLON 4 ULTRA	14	fl.ozs.	eucalyptus saplings	62719-527	Spray	
		TOTAL GARLON 2008	179.5					
18242	oxalis	GARLON 4 ULTRA	2	fl.ozs.	weeds	62719-527	Spray	
18273		GARLON 4 ULTRA	4.8	fl.ozs.	oxalis	62719-527	Spray	
18274	Brooks park, Orizaba rocks	GARLON 4 ULTRA	4.8	fl.ozs.	oxalis	62719-527	Spray	
18275	BAYVIEW HILL	GARLON 4 ULTRA	28.5	fl.ozs.	oxalis	62719-527	Spray	
18276	Corona	GARLON 4 ULTRA	9.6	fl.ozs.	oxalis	62719-527	Spray	
18329	twin peaks	GARLON 4 ULTRA	3.6	fl.ozs.	oxalis	62719-527	Spray	
18330	Glen Canyon	GARLON 4 ULTRA	6	fl.ozs.	poison oak	62719-527	Spray	

18331	Glen Canyon	GARLON 4 ULTRA	3	fl.ozs.	OXALIS	62719-527	Spray	
18332	Glen Canyon... above seep	GARLON 4 ULTRA	3	fl.ozs.	OXALIS	62719-527	Spray	
18333	billygoat hill	GARLON 4 ULTRA	5.5	fl.ozs.	OXALIS/ invasive pea	62719-527	Spray	
18476		GARLON 4 ULTRA	14.4	fl.ozs.	weeds	62719-527	Spray	
18477		GARLON 4 ULTRA	10	fl.ozs.	weeds	62719-527	Spray	
18510		GARLON 4 ULTRA	2	fl.ozs.	acacia resprouts	62719-527	DAUBER	
18511		GARLON 4 ULTRA	6	fl.ozs.	broadleaf weeds	62719-527	Spray	
18583	McLaren	GARLON 4 ULTRA	3	fl.ozs.	fennel	62719-527	Daubber	
18584	McLaren	GARLON 4 ULTRA	3	fl.ozs.	fennel	62719-527	Daubber	
		TOTAL GARLON 2009	109.2					
18667	Mt Davidson	Garlon	2	fl.ozs.	oxalis - grasslands	627-1940	Backpack sprayer	Lisa Wayne
18729	Twin Peaks	Garlon	19	fl.ozs.	oxalis	627-1940	Backpack sprayer	Jan Campos, Kirra Sw
18726	Twin Peaks	Garlon 4	10.5	fl.ozs.	N & S peak, scot's garden, top of Mission bowl	62719529	Backpack sprayer	Kirra Swenertor
18727	Twin Peaks	Garlon 4	7.2	fl.ozs.	Mission Ridge & bowl, oxalis	62719529	Backpack sprayer	Kirra Swenertor
18730	Mt Davidson	Garlon 4 Ultra	9	fl.ozs.	Mt Davidson/ Cape Ivy	62719 527	Backpack	Ryan Gerlach
18731	Mt Davidson	Garlon 4 Ultra	3.6	fl.ozs.	oxalis	62719 527	Backpack	Ryan Gerlach
18732	Twin Peaks	Garlon 4 Ultra	8	fl.ozs.	Algerian ivy	62719 527	Backpack	illeg
18733	Twin Peaks	Garlon 4 Ultra	9	fl.ozs.	oxalis	62719 527	Backpack	illeg
18734	Mt Davidson	Garlon 4 Ultra	3.6	fl.ozs.	oxalis	6271940	Backpack	illeg
18728	Grandview	Garlon 4 Ultra	3.6	fl.ozs.	oxalis narrow leaf replant	62719 527	Backpack	Kirra Swenertor
18725	McLaren	Garlon 4 Ultra	3.6	fl.ozs.	East of amphitheater/ flat wet meadow	62719 527	Backpack	Christopher Campl
	Glen Canyon/ O' Shaughnessy	Garlon 4 Ultra	6.5	fl.ozs.	O'Shaughnessy roadside, del Vale to Malta	62719 527	Backpack	Zebell
	Glen Canyon/ Fox meadow, paths, hemlock patch	Garlon 4 Ultra	12.5	fl.ozs.		62719 527	Backpack	DeMeo/ Swenertc
	Glen Canyon/ Fox meadow	Garlon 4 Ultra	5	fl.ozs.	Poison oak, broom, english ivy, hemlock	62719-527	Backpack	DeMeo L
	O'Shaughnessy	Garlon 4 Ultra	3	fl.ozs.	Scabiosa	62719-527	Backpack	Campbell, Chris
	Twin Peaks	Garlon 4 Ultra	3.8	fl.ozs.	Fennel along Burnett	62719-527		(Shelterbelt) Garcia/v
	Twin Peaks	Garlon 4 Ultra	8	fl.ozs.	Cotoneaster (stump treatment)	62719-527		(Shelterbelt) Garcia/v
	Oak Woodlands (GGP)	Garlon 4 Ultra	4.5	fl.ozs.	Cotoneaster/mayten/ tree of heaven	62719-527		(Shelterbelt) Garcia/v
	Twin Peaks	Garlon 4 Ultra		fl.ozs.	Cotoneaster	62719-527		(Shelterbelt) Garcia/v
	McLaren	Garlon 4 Ultra	8	fl.ozs.	Gazania and fennel - Vis Valley overlook	627-1940	Backpack	K Swenerton

McLaren - University Hill	Garlon 4 Ultra	3.6	fl. ozs.	Above asphalt path at University and Woolsey; fennel	62719-0537	Backpack sprayer	Licia De Meo
McLaren - tryphzalia (?) area	Garlon 4 Ultra	15	fl. ozs.	Gazania and fennel between 2 paths and grasslands	62719-0537	Backpack sprayer	Lisa Wayne
McLaren	Garlon 4 Ultra	9	fl. ozs.	Fennel - south of Mansell, east of Visitacion	62719-527	Backpack	Ryan Gerlach, Ventura
Bayview McLaren	Garlon 4 Ultra	24	fl. ozs.	Fennel- grasslands S of Mansell Forest	62719-527	Backpack	Ryan Gerlach, Ventura
	Garlon 4 Ultra	6			627-1940	Dauber stump treatment	K Swenerton
			fl. ozs.				
McLaren (Geneva)	Garlon 4 Ultra	1	fl. ozs.	Geneva Ridge fennel	627-1940	Dauber (cut and daub)	Dylan Hayes
Twin Peaks	Garlon 4 Ultra + spraytech oil	15	fl. ozs.	Poison Oak, Fennel - PO along path and fennel above Crestline	62719-527	Backpack	Ryan Gerlach, Ventura Ben Adamo
			fl. ozs.				
Bayview	Garlon 4 Ultra + spraytech oil	2	fl. ozs.	Fennel along steep access rd	62719-527	Backpack	Ryan Gerlach
Bernal	Garlon 4 Ultra + Spraytech oil	4	fl. ozs.	fennel on north-facing slope	62719-527	cut stump	Ryan Gerlach, Venny
Twin Peaks	Garlon 4 Ultra + Spraytech oil	78	fl. ozs.	Slope above Burnett: French Broom, Cotoneaster	62719-527	Cut stump	Ventura Garcia, Ben A Paul Wilson, Jake Hai
			fl. ozs.				
Glen Park	Garlon 4 Ultra + Spraytech oil	2.5	fl. ozs.	Slope above Burnett: French Broom, Cotoneaster	62719-527	Cut stump	Paul Wilson, Shellie Pi
			fl. ozs.				
Glen Park	Garlon 4 Ultra + Spraytech oil	27	fl. ozs.	Monocot City: French Broom, Cotoneaster	62719-527	Cut stump	Paul Wilson, Shellie Pi
			fl. ozs.				
RPD-Glen Park Natural Areas	GARLON 4UL	1	fl. ozs.	Weeds-misc	62719527AA62719		Hayes, D
RPD-Golden Gate Park-SEC 2	GARLON 4UL	4	fl. ozs.	Weeds-misc	62719527AA62719		Hayes, D
RPD-Twin Peaks	GARLON 4UL	8	fl. ozs.	Weeds-misc	62719527AA62719		Gerlach, Ryan
RPD-Twin Peaks	GARLON 4UL	10	fl. ozs.	Weeds-misc	62719527AA62719		Garcia, Shelter Bel

		Total GARLON 2010	340.169				
ROUNDUP							
17698	landscape	ROUNDUP PRO DRY	1.8	ozs.	cape ivy	524-505	Spray HAYES, DYLAN
17767	twin peaks- erharta	ROUNDUP PRODRY	4	ozs.	arctotheca	524-505	Spray DE MEO, LICIA
17768	west grassland brooks	ROUNDUP PRODRY	9.8	ozs.	weeds	524-505	Spray HAYES, DYLAN
17769	Edgehill ...erharta	ROUNDUP PRODRY	8	ozs.	weeds	524-505	Spray ZEBELL, RANDOL (RANDY)
17770	Brooks...erharta	ROUNDUP PRODRY	4.8	ozs.	weeds	524-505	Spray HAYES, DYLAN
17882		ROUNDUP PRO HERBICIDE	2	fl.ozs.	stumps	524-475-ZA-524	Spray ANNESE, THOMAS (
		RODEO AQUATIC HERBICIDE (Glyphosate, Dow)					
17766	Mc Laren marsh area	HERBICIDE (Glyphosate, Dow)	2.6	fl.ozs.	arctotheca	524-343-AA-524	Spray DE MEO, LICIA
		TOTAL ROUNDUP 2008	33				

18399	gazenia	ROUNDUP PRODRY	1.6	ozs.	weeds	524-505	Spray	
18400	hawk hill	ROUNDUP PRODRY	4.8	ozs.	weeds	524-505	Spray	
18578	upper grassland	ROUNDUP PRODRY	6.4	ozs.	weeds	524-505	Spray	
18579	billy goat hill	ROUNDUP PRODRY	0.8	ozs.	weeds	524-505	Spray	
18580	edgehill	ROUNDUP PRODRY	9	ozs.	weeds	524-505	Spray	
18581	McLaren	ROUNDUP PRODRY	4.8	ozs.	weeds	524-505	Spray	
TOTAL ROUNDUP 2009			27.4					
18735	Pine Lake	Aquamaster	16		Pine Lake/ cape ivy	524-343	Backpack	Mark Heath
	Lake Merced	Aquamaster	8		Ludwigia	524-343	sprayer	JC
	Lake Merced	Aquamaster	2		Impound lake - Ludwigia	524-343	Backpack sprayer	R Zebell
	Glen Park	Aquamaster + Spraytech Oil	22		Site C above Silver Tree: French Broom and Poison Oak	524-343	Backpack sprayer	Ventura Garcia, Ben A
	Glen Park	Aquamaster + Spraytech Oil	30		Monocot City: French Broom, Cotoneaster	524-343	Cut stump	Ventura Garcia, Ben A
	Twin Peaks	Aquamaster + Spraytech Oil	8		Slope above Burnett: Jupiter's Beard	524-343	Backpack sprayer	Ventura Garcia, Ben A Paul Wilson, Jake Hai
	McLaren	Roundup Pro	3.6		Arctotheca - Upper meadow, Yosemite Marsh	524-475	Backpack sprayer	L. DeMeo
	Glen Canyon, Fox Meadow	Roundup Pro [Max]	6.4		Fox Meadow - Poison oak and mustard	524-579	backpack sprayer	Licia De Meo, Dylan I
	Sharp Park	Roundup Pro [Max]	1.3		Pampas grass	524-579	hand sprayer	Kirra Swenerton
18668	Mt Davidson	Roundup Pro Dry	1		erhata - grasslands - edge of forest	524-505	Backpack sprayer	Christopher Camp
18722	Mt Davidson	Roundup Pro Dry	3		Erhata	524 505	Backpack	illeg
18724	McLaren	Roundup Pro Dry	6.0		Upper Yosemite Marsh - arctotheca, Kikuyu burclover	524 505	Backpack sprayer	Licia DeMeo/ Christc Campbell
	Hawk Hill	Roundup Pro Dry	3		slope -erhata	524-505	Backpack	Zebell, R
	Glen Canyon/ Fox meadow	Roundup Pro Dry	4.5		Radish, erhata	524-505	Backpack	Swenerton, K
	Edgehill	Roundup Pro Dry	9		Edgehill - planted area/ erhata	524-505	Backpack	R Zebell, C Camp
	Sharp Park	Roundup Pro Dry	1.5		Pampas grass	524-505	hand sprayer	Kirra Swenerton
18721	Mt Davidson	Roundup Pro Max	9		Erhata	524 ?	Backpack	Ryan Gerlach
18723	Glen Canyon	Roundup Pro Max	9.0		Area A - hemlock thistle	524 579	Backpack sprayer	shelterbelt/ Ryan Ge
	Twin Peaks	Roundup Pro Max	4		sprayed French Broom that was missed or too small to pull along Burnett.	524-579		Shelterbelt/ Gerla

Oak Woodlands (GGP)	Roundup Pro Max		cape ivy	524-579		(Shelterbelt) Gerlach/
McLaren	Roundup Pro Max	6.8	Fennel - south of Mansell, east of Visitation	524-579	Backpack	Ryan Gerlach, Ventura
Bayview	Roundup Pro Max	18	Fennel- grasslands	524-579	Backpack	Ryan Gerlach, Ventura
Twin Peaks	Roundup Pro Max	1	Patch of erhata off Twin Peaks	524-579	Backpack	Ryan Gerlach
McLaren Park	Roundup Pro Max	3	Patch of pampas grass off Visitation	524-579	Backpack	Venny Garcia
RPD-Mt Davidson	AQUAMASTER	34.432	Weeds-erharta	524343ZF524		Gerlach, Ryan
RPD-Golden Gate Park-SEC 1	AQUAMASTER	14.3646	Weeds-ivy	524343ZF524		Gerlach, Ryan
RPD-Mt Davidson	AQUAMASTER	2.8514	Weeds-blackberry	524343ZF524		
RPD-John McLaren Park	ROUNDUP PR	5.844	Weeds-misc	524579AA524		Taylor, Zack
RPD-Lake Merced Park	AQUAMASTER	1.883	Weeds-misc	524343ZF524		Zebell, R
RPD-Twin Peaks	ROUNDUP PR	0.2435	Weeds-pampas grass	524579AA524		Garcia, Shelter Bel
RPD-Glen Park Natural Areas	ROUNDUP PR	4.383	Weeds-misc	524579AA524		Garcia, Shelter Bel
TOTAL ROUNDUP/ AQUAMASTER 2010		240.102				

OTHER STUFF								
18088		SAPPHIRE (Penoxsulam fm Dow)	96	fl.ozs.	english daisy	62719-547	Boom Spray	
18089		HABITAT (Imazapyr from BASF)	5.8	fl.ozs.	invasive weeds	241-426	Spray	
18334	oak woodlands	MILESTONE (aminopyralid from Dow)	10.8	fl.ozs.	cape ivy	62719-519	Spray	
18582	lake merced at impound lake	HABITAT (Imazapyr from BASF)	4	fl.ozs.	ludwegia	241-426	Spray	
18736	Pine Lake	MILESTONE (aminopyralid from Dow)	1	fl.ozs.		62719-537	backpack	
	RPD-Golden Gate Park-SEC 1	MILESTONE	0.6496		Weeds-ivy	62719537AA62719		Gerlach, Ryan

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ATTACHMENT B. APPLICATION OF GARLON WITHOUT A RESPIRATOR

From: [Mary McAllister](#)
To: [Lisa Wayne](#)
Cc: Chris.Geiger@sfgov.org ; Ralph.Montana@sfgov.org
Sent: Wednesday, February 09, 2011 9:03 AM
Subject: Violation of City's IPM policy

Dear Lisa, Attached are photos of a pesticide application on February 3rd on Twin Peaks, near the reservoir. According to the corresponding Notice of Pesticide Application, the person was spraying Garlon 4 Ultra. It appears that the person doing the spraying is not wearing a respirator.

As you know, the IPM policy that was approved on January 25th by the Commission on the Environment has approved the restricted use of Garlon 4 and Garlon 4 Ultra as follows: "Use only for targeted treatments of high profile or highly invasive exotics via dabbing or injection. May use for targeted spraying only when dabbing or injection are not feasible, and **only with use of a respirator**. HIGH PRIORITY TO FIND ALTERNATIVE." (emphasis added). Therefore, the person photographed spraying Garlon 4 Ultra was not in compliance with the city's IPM policy.

I hope, for the safety of your staff and your sub-contractors, that those who are responsible for spraying this toxic chemical will be informed that they must wear a respirator in the future. As you know, the City's IPM policy classifies this chemical as "Tier I Most Hazardous." The Material Safety Data Sheet for this chemical reports that OSHA classifies this chemical as both an "Immediate" and a "Delayed Health Hazard."

Thank you for your attention to this important matter.

Mary McAllister



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ATTACHMENT C. DOW GARLON SAFETY SHEET

Product Name: Garlon* 4 Herbicide **Issue Date:** 2011.09.14 TM * Trademark of Dow AgroSciences LLC **Page** 1 of 9 Dow AgroSciences Canada Inc. encourages and expects you to read and understand the entire (M)SDS, as there is important information throughout the document. We expect you to follow the precautions identified in this document unless your use conditions would necessitate other appropriate methods or actions.

Material Safety Data Sheet**Dow AgroSciences Canada Inc.****1. Product and Company Identification****Product Name**

Garlon* 4 Herbicide

COMPANY IDENTIFICATION

Dow AgroSciences Canada Inc.

A Subsidiary of The Dow Chemical Company

Suite 2100, 450 1st Street SW,

Calgary, AB T2P 5H1

Canada

For MSDS updates and Product Information: 800-667-3852**Prepared By:** Prepared for use in Canada by EH&S, Hazard Communications.**Revision** 2011.09.14Customer Information Number: 800-667-3852
solutions@dow.com**EMERGENCY TELEPHONE NUMBER****24-Hour Emergency Contact:** 613-996-6666**Local Emergency Contact:** 613-996-6666**2. Hazards Identification****Emergency Overview****Color:** Yellow**Physical State:** Liquid**Odor:** Gasoline-like**Hazards of product:**

DANGER! Combustible liquid and vapor. May cause allergic skin reaction. May cause eye irritation. May cause skin irritation. Harmful or fatal if swallowed; can enter lungs and cause damage. Isolate area. Toxic fumes may be released in fire situations. Highly toxic to fish and/or other aquatic organisms.

Potential Health Effects

Eye Contact: May cause pain disproportionate to the level of irritation to eye tissues. May cause slight eye irritation. Corneal injury is unlikely.

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Skin Contact: Brief contact may cause moderate skin irritation with local redness. Repeated contact may cause severe skin irritation with local redness and discomfort. May cause drying and flaking of the skin.

Skin Absorption: Prolonged skin contact is unlikely to result in absorption of harmful amounts.

Skin Sensitization: Has caused allergic skin reactions when tested in guinea pigs. With the dilute mix, no allergic skin reaction is expected.

Inhalation: Mist may cause irritation of upper respiratory tract (nose and throat).

Ingestion: Low toxicity if swallowed. Small amounts swallowed incidentally as a result of normal handling operations are not likely to cause injury; however, swallowing larger amounts may cause injury.

Aspiration hazard: Aspiration into the lungs may occur during ingestion or vomiting, causing lung damage or even death due to chemical pneumonia.

Cancer Information: In a lifetime animal dermal carcinogenicity study, an increased incidence of skin tumors was observed when kerosene was applied at doses that also produced skin irritation. This response was similar to that produced in skin by other types of chronic chemical/physical irritation. No increase in tumors was observed when non-irritating dilutions of kerosene were applied at equivalent doses, indicating that kerosene is unlikely to cause skin cancer in the absence of long-term continued skin irritation. In long-term animal studies with ethylene glycol butyl ether, small but statistically significant increases in tumors were observed in mice but not rats. The effects are not believed to be relevant to humans. If the material is handled in accordance with proper industrial handling procedures, exposures should not pose a carcinogenic risk to man.

Birth Defects/Developmental Effects: For the active ingredient(s): Has been toxic to the fetus in laboratory animals at doses toxic to the mother.

Reproductive Effects: For similar active ingredient(s). Triclopyr. In laboratory animal studies, effects on reproduction have been seen only at doses that produced significant toxicity to the parent animals.

3. Composition/information on ingredients

Component	CAS #	Amount W/W
Triclopyr-2-butoxyethyl ester	64700-56-7	61.6 %
Kerosene (petroleum)	8008-20-6	>= 18.6 - <= 31.0 %
Ethylene glycol monobutyl ether	111-76-2	0.5 %
Balance	Not available	>= 6.9 - <= 19.3 %

Amounts are presented as percentages by weight.

4. First-aid measures

Description of first aid measures

General advice: First Aid responders should pay attention to self-protection and use the recommended protective clothing (chemical resistant gloves, splash protection). If potential for exposure exists refer to Section 8 for specific personal protective equipment.

Inhalation: Move person to fresh air. If person is not breathing, call an emergency responder or ambulance, then give artificial respiration; if by mouth to mouth use rescuer protection (pocket mask etc). Call a poison control center or doctor for treatment advice.

Skin Contact: Take off contaminated clothing. Wash skin with soap and plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice. Wash clothing before

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reuse. Shoes and other leather items which cannot be decontaminated should be disposed of properly. Suitable emergency safety shower facility should be available in work area.

Eye Contact: Hold eyes open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eyes. Call a poison control center or doctor for treatment advice.

Ingestion: Immediately call a poison control center or doctor. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give any liquid to the person. Do not give anything by mouth to an unconscious person.

Most important symptoms and effects, both acute and delayed

Aside from the information found under Description of first aid measures (above) and indication of immediate medical attention and special treatment needed (below), no additional symptoms and effects are anticipated.

Indication of immediate medical attention and special treatment needed

The decision of whether to induce vomiting or not should be made by a physician. If lavage is performed, suggest endotracheal and/or esophageal control. Danger from lung aspiration must be weighed against toxicity when considering emptying the stomach. No specific antidote.

Treatment of exposure should be directed at the control of symptoms and the clinical condition of the patient. Have the Safety Data Sheet, and if available, the product container or label with you when calling a poison control center or doctor, or going for treatment.

Skin contact may aggravate preexisting dermatitis.

5. Fire Fighting Measures

Suitable extinguishing media

Water fog or fine spray. Dry chemical fire extinguishers. Carbon dioxide fire extinguishers. Foam. Alcohol resistant foams (ATC type) are preferred. General purpose synthetic foams (including AFFF) or protein foams may function, but will be less effective.

Special hazards arising from the substance or mixture

Hazardous Combustion Products: During a fire, smoke may contain the original material in addition to combustion products of varying composition which may be toxic and/or irritating. Combustion products may include and are not limited to: Phosgene. Nitrogen oxides. Hydrogen chloride. Carbon monoxide. Carbon dioxide.

Unusual Fire and Explosion Hazards: Container may rupture from gas generation in a fire situation. Violent steam generation or eruption may occur upon application of direct water stream to hot liquids. Dense smoke is produced when product burns.

Advice for firefighters

Fire Fighting Procedures: Keep people away. Isolate fire and deny unnecessary entry. Consider feasibility of a controlled burn to minimize environment damage. Foam fire extinguishing system is preferred because uncontrolled water can spread possible contamination. Use water spray to cool fire exposed containers and fire affected zone until fire is out and danger of reignition has passed. Fight fire from protected location or safe distance. Consider the use of unmanned hose holders or monitor nozzles. Immediately withdraw all personnel from the area in case of rising sound from venting safety device or discoloration of the container. Burning liquids may be extinguished by dilution with water. Do not use direct water stream. May spread fire. Move container from fire area if this is possible without hazard. Burning liquids may be moved by flushing with water to protect personnel and minimize property damage. Contain fire water run-off if possible. Fire water run-off, if not contained, may cause environmental damage.

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Review the “Accidental Release Measures” and the “Ecological Information” sections of this (M)SDS.

Special Protective Equipment for Firefighters: Wear positive-pressure self-contained breathing apparatus (SCBA) and protective fire fighting clothing (includes fire fighting helmet, coat, trousers, boots, and gloves). Avoid contact with this material during fire fighting operations. If contact is likely, change to full chemical resistant fire fighting clothing with self-contained breathing apparatus. If this is not available, wear full chemical resistant clothing with self-contained breathing apparatus and fight fire from a remote location. For protective equipment in post-fire or non-fire clean-up situations, refer to the relevant sections. See Section 9 for related Physical Properties

6. Accidental Release Measures

Personal precautions, protective equipment and emergency procedures: Isolate area. Keep unnecessary and unprotected personnel from entering the area. Refer to Section 7, Handling, for additional precautionary measures. No smoking in area. Use appropriate safety equipment. For additional information, refer to Section 8, Exposure Controls and Personal Protection.

Environmental precautions: Prevent from entering into soil, ditches, sewers, waterways and/or groundwater. See Section 12, Ecological Information.

Methods and materials for containment and cleaning up: Contain spilled material if possible. Small spills: Absorb with materials such as: Clay. Dirt. Sand. Sweep up. Collect in suitable and properly labeled containers. Large spills: Contact Dow AgroSciences for clean-up assistance.

7. Handling and Storage

Handling

General Handling: Containers, even those that have been emptied, can contain vapors. Do not cut, drill, grind, weld, or perform similar operations on or near empty containers. Spills of these organic materials on hot fibrous insulations may lead to lowering of the autoignition temperatures possibly resulting in spontaneous combustion. Keep out of reach of children. Do not swallow. Avoid breathing vapor or mist. Avoid contact with eyes, skin, and clothing. Use with adequate ventilation. Wash thoroughly after handling.

Storage

Store in a dry place. Store in original container. Keep container tightly closed. Do not store near food, foodstuffs, drugs or potable water supplies.

8. Exposure Controls / Personal Protection

Exposure Limits

Component	List	Type	Value
Kerosene (petroleum)	Dow IHG	TWA as total hydrocarbon vapor	10 mg/m3 SKIN
CAD BC OEL	TWA Non-aerosol. as total hydrocarbon vapor	200 mg/m3 SKIN	

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ACGIH	TWA Non-aerosol. as total hydrocarbon vapor	200 mg/m3 P: Application restricted to conditions in which there are negligible aerosol exposures.
CAD ON OEL	TWAEV as total hydrocarbon vapor	200 mg/m3 SKIN
CAD AB OEL	TWA Vapor. as total hydrocarbon vapor	200 mg/m3
CAD AB OEL	SKIN Vapor. as total hydrocarbon vapor	Can be absorbed through the skin.

Triclopyr-2-butoxyethyl ester Dow IHG TWA 2 mg/m3 D-SEN

Ethylene glycol monobutyl ether CAD ON OEL TWAEV 20 ppm SKIN

ACGIH	TWA	20 ppm
CAD AB OEL	TWA	97 mg/m3 20 ppm SKIN
CAD BC OEL	TWA	20 ppm
OEL (QUE) TWA	97 mg/m3	20 ppm
OEL (QUE) TWA	97 mg/m3	20 ppm

[Consult local authorities for recommended exposure limits.]

RECOMMENDATIONS IN THIS SECTION ARE FOR MANUFACTURING, COMMERCIAL BLENDING AND PACKAGING WORKERS. APPLICATORS AND HANDLERS SHOULD SEE THE PRODUCT LABEL FOR PROPER PERSONAL PROTECTIVE EQUIPMENT AND CLOTHING.

A "skin" notation following the inhalation exposure guideline refers to the potential for dermal absorption of the material including mucous membranes and the eyes either by contact with vapors or by direct skin contact.

It is intended to alert the reader that inhalation may not be the only route of exposure and that measures to minimize dermal exposures should be considered.

A D-SEN notation following the exposure guideline refers to the potential to produce dermal sensitization, as confirmed by human or animal data.

Personal Protection

Eye/Face Protection: Use safety glasses (with side shields).

Skin Protection: Use protective clothing chemically resistant to this material. Selection of specific items such as face shield, boots, apron, or full body suit will depend on the task.

Hand protection: Use gloves chemically resistant to this material. Examples of preferred glove barrier materials include: Chlorinated polyethylene. Neoprene. Nitrile/butadiene rubber ("nitrile" or "NBR"). Polyethylene. Ethyl vinyl alcohol laminate ("EVAL"). Examples of acceptable glove barrier materials include: Butyl rubber. Natural rubber ("latex"). Polyvinyl chloride ("PVC" or

Ingestion: Avoid ingestion of even very small amounts; do not consume or store food or tobacco in the work area; wash hands and face before smoking or eating.

Ventilation: Use local exhaust ventilation, or other engineering controls to maintain airborne levels below exposure limit requirements or guidelines. If there are no applicable exposure limit requirements or guidelines, general ventilation should be sufficient for most operations. Local exhaust ventilation may be necessary for some operations.

Appearance

Physical State	Liquid
Color	Yellow
Odor	Gasoline-like
Odor Threshold	No test data available
pH	6.4 <i>pH Electrode</i>
Melting Point	Not applicable
Freezing Point	No test data available
Boiling Point (760 mmHg)	No test data available
Flash Point - Closed Cup	65.5 °C <i>Closed Cup</i>
Evaporation Rate (Butyl Acetate = 1)	No test data available

Flammable Limits In Air Lower: No test data available

Upper: No test data available

Vapor Pressure	No test data available
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Vapor Density (air = 1)	No test data available
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Specific Gravity (H₂O = 1)	1.08 23 °C/4 °C <i>EC Method A3</i>
Solubility in water (by weight)	emulsifiable
Partition coefficient, n-octanol/water (log Pow)	4.09 <i>Measured</i>
Autoignition Temperature	No test data available
Decomposition Temperature	No test data available
Kinematic Viscosity	11.2 cSt @ 20 °C

10. Stability and Reactivity**Reactivity**

No dangerous reaction known under conditions of normal use.

Chemical stability

Thermally stable at typical use temperatures.

Possibility of hazardous reactions

Polymerization will not occur.

Conditions to Avoid: Active ingredient decomposes at elevated temperatures. Generation of gas during decomposition can cause pressure in closed systems.

Incompatible Materials: Avoid contact with: Acids. Bases. Oxidizers.

Hazardous decomposition products

Decomposition products depend upon temperature, air supply and the presence of other materials. Decomposition products can include and are not limited to: Carbon monoxide. Carbon dioxide. Hydrogen chloride. Nitrogen oxides. Phosgene. Toxic gases are released during decomposition.

11. Toxicological Information**Acute Toxicity****Ingestion**

LD50, Rat 1,338 mg/kg

Dermal

LD50, Rabbit > 2,000 mg/kg

Inhalation

LC50, 4 h, Aerosol, Rat > 5.2 mg/l

No deaths occurred at this concentration.

Eye damage/eye irritation

May cause pain disproportionate to the level of irritation to eye tissues. May cause slight eye irritation. Corneal injury is unlikely.

Skin corrosion/irritation

Brief contact may cause moderate skin irritation with local redness. Repeated contact may cause severe skin irritation with local redness and discomfort. May cause drying and flaking of the skin.

Sensitization**Skin**

Has caused allergic skin reactions when tested in guinea pigs. With the dilute mix, no allergic skin reaction is expected.

Respiratory

No relevant information found.

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Repeated Dose Toxicity

Based on available data, repeated exposures are not anticipated to cause additional significant adverse effects.

Chronic Toxicity and Carcinogenicity

Active ingredient did not cause cancer in laboratory animals. In a lifetime animal dermal carcinogenicity study, an increased incidence of skin tumors was observed when kerosene was applied at doses that also produced skin irritation. This response was similar to that produced in skin.

by other types of chronic chemical/physical irritation. No increase in tumors was observed when non-irritating dilutions of kerosene were applied at equivalent doses, indicating that kerosene is unlikely to cause skin cancer in the absence of long-term continued skin irritation. In long-term animal studies with ethylene glycol butyl ether, small but statistically significant increases in tumors were observed in mice but not rats. The effects are not believed to be relevant to humans. If the material is handled in accordance with proper industrial handling procedures, exposures should not pose a carcinogenic risk to man.

Carcinogenicity Classifications:

Component	List	Classification
Kerosene (petroleum)	ACGIH	Confirmed animal carcinogen with unknown relevance to humans.; Group A3
Ethylene glycol monobutyl ether	ACGIH	Confirmed animal carcinogen with unknown relevance to humans.; Group A3

Developmental Toxicity

For the active ingredient(s): Has been toxic to the fetus in laboratory animals at doses toxic to the mother. Did not cause birth defects in laboratory animals.

Reproductive Toxicity

For similar active ingredient(s). Triclopyr. In laboratory animal studies, effects on reproduction have been seen only at doses that produced significant toxicity to the parent animals. For kerosene: Limited data in laboratory animals suggest that the material does not affect reproduction.

Genetic Toxicology

Contains a component(s) which were negative in in vitro genetic toxicity studies. Contains component(s) which were negative in animal genetic toxicity studies.

12. Ecological Information**Toxicity**

Material is highly toxic to aquatic organisms on an acute basis (LC50/EC50 between 0.1 and 1 mg/L in the most sensitive species tested). Material is slightly toxic to birds on an acute basis (LD50 between 501 and 2000 mg/kg).

Fish Acute & Prolonged Toxicity

LC50, rainbow trout (*Oncorhynchus mykiss*), flow-through, 96 h: 0.984 mg/l

Aquatic Invertebrate Acute Toxicity

EC50, water flea *Daphnia magna*, flow-through, 48 h, immobilization: 0.35 mg/l

Aquatic Plant Toxicity

EbC50, green alga *Pseudokirchneriella subcapitata* (formerly known as *Selenastrum capricornutum*), biomass growth inhibition, 72 h: 10.6 mg/l

Toxicity to Above Ground Organisms

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oral LD50, bobwhite (*Colinus virginianus*)

oral LD50, Honey bee (*Apis mellifera*)

contact LD50, Honey bee (*Apis mellifera*)

Toxicity to Soil Dwelling Organisms

LC50, Earthworm *Eisenia foetida*, adult, 14 d: 2,552 mg/kg

Persistence and Degradability

Biodegradation under aerobic static laboratory conditions is high (BOD20 or BOD28/ThOD > 40%).

Bioaccumulative potential

Bioaccumulation: Bioconcentration potential is moderate (BCF between 100 and 3000 or Log Pow between 3 and 5).

Partition coefficient, n-octanol/water (log Pow): 4.09 Measured

Bioconcentration Factor (BCF): Bioconcentration potential is moderate (BCF between 100 and 3000 or Log Pow between 3 and 5). 505

Mobility in soil

Mobility in soil: No relevant data found.

13. Disposal Considerations

If wastes and/or containers cannot be disposed of according to the product label directions, disposal of this material must be in accordance with your local or area regulatory authorities. This information presented below only applies to the material as supplied. The identification based on characteristic(s) or listing may not apply if the material has been used or otherwise contaminated. It is the responsibility of the waste generator to determine the toxicity and physical properties of the material generated to determine the proper waste identification and disposal methods in compliance with applicable regulations. If the material as supplied becomes a waste, follow all applicable regional, national and local laws.

14. Transport Information

TDG Small container

NOT REGULATED

TDG Large container

NOT REGULATED

IMDG

Proper Shipping Name: ENVIRONMENTALLY HAZARDOUS SUBSTANCES, LIQUID, N.O.S

Technical Name: Contains Triclopyr-2-butoxyethyl Ester, KEROSENE

Hazard Class: 9 **ID Number:** UN3082 **Packing Group:** PG III

EMS Number: f-a,s-f

Marine pollutant: Yes

ICAO/IATA

Proper Shipping Name: ENVIRONMENTALLY HAZARDOUS SUBSTANCES, LIQUID, N.O.S

Technical Name: Contains Triclopyr-2-butoxyethyl Ester, KEROSENE

Hazard Class: 9 **ID Number:** UN3082 **Packing Group:** PG III

Cargo Packing Instruction: 964

Passenger Packing Instruction: 964

15. Regulatory Information

CEPA - Domestic Substances List (DSL)

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All substances contained in this product are listed on the Canadian Domestic Substances List (DSL) or are not required to be listed.

Hazardous Products Act Information: CPR Compliance

This product has been classified in accordance with the hazard criteria of the Canadian Controlled Products Regulations (CPR) and the MSDS contains all the information required by the CPR.

Hazardous Products Act Information: WHMIS Classification

This product is exempt under WHMIS.

Pest Control Products Act Registration number: 21053

National Fire Code of Canada

Class IIIA

16. Other Information

Hazard Rating System

NFPA	Health	Fire	Reactivity
	2	2	1

Recommended Uses and Restrictions

Identified uses

Product use: End use herbicide product

Revision

Identification Number: 50683 / 1023 / Issue Date 2011.09.14 / Version: 5.0

DAS Code: XRM-4714

Most recent revision(s) are noted by the bold, double bars in left-hand margin throughout this document.

Legend

N/A	Not available
W/W	Weight/Weight
OEL	Occupational Exposure Limit
STEL	Short Term Exposure Limit
TWA	Time Weighted Average
ACGIH	American Conference of Governmental Industrial Hygienists, Inc.
DOW IHG	Dow Industrial Hygiene Guideline
WEEL	Workplace Environmental Exposure Level
HAZ DES	Hazard Designation
VOL/VOL	Volume/Volume

Dow AgroSciences Canada Inc. urges each customer or recipient of this (M)SDS to study it carefully and consult appropriate expertise, as necessary or appropriate, to become aware of and understand the data contained in this (M)SDS and any hazards associated with the product. The information herein is provided in good faith and believed to be accurate as of the effective date shown above. However, no warranty, express or implied, is given. Regulatory requirements are subject to change and may differ between various locations. It is the buyer's/user's responsibility to ensure that his activities comply with all federal, state, provincial or local laws. The information presented here pertains only to the product as shipped. Since conditions for use of the product are not under the control of the manufacturer, it is the buyer's/user's duty to determine the conditions necessary for the safe use of this product. Due to the proliferation of

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sources for information such as manufacturer-specific (M)SDSs, we are not and cannot be responsible for (M)SDSs obtained from any source other than ourselves. If you have obtained an (M)SDS from another source or if you are not sure that the (M)SDS you have is current, please contact us for the most current version.

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ATTACHMENT D: LETTER FROM UC BERKELEY TO FEMA

PROJECT MAINTENANCE COSTS

The University of California, Berkeley, Associate Director of Physical Plant, Robert Costa, completed an estimate of life-cycle maintenance costs for 2 UC projects. The letter containing Mr. Costa's Opinion follows.

February 15, 2005

TEMA KLATT, MANAGER
Fire Mitigation Program
601 Sproul Hall
University of California
Berkeley, CA 94720-1199

RE: Professional Opinion on Project Maintenance Costs

Per your request, I've reviewed the scope of work proposed for the two fire-fuel management projects you've proposed for Strawberry Canyon and Claremont Canyon and have prepared a cost estimate for ongoing maintenance of these sites over the expected life-cycle.

In each location, the site is covered with heavy stands of blugum eucalyptus trees, with an understory of another, native (Map, Oak, Maple) and various shrubs, herbs and gramin. The project will involve the removal of the eucalyptus and the retention of the remaining plant coverage. Ongoing maintenance for the next ten years is to ensure that the eucalyptus does not re-sprout (coppicing) from cut stumps and to ensure that any seedlings from the latent seed stock are removed on a continuing basis, until the latent seed stock is exhausted.

I would recommend that two chemical treatments be made to both sites each year for 10 years, with the objective of treating sprouts with herbicide. A basal bark treatment is recommended for the sprouts and a low volume foliar spray is recommended for seedlings. Based on this terrain and stand density, and assuming an initial treatment effectiveness during felling of 70%, I estimate that 1.5 hours of labor will be required to treat each acre per visit, totaling to 3 hours of labor, per year, per acre. Standard recharge labor rate, which includes benefits and indirect overhead, is currently \$49.75/hr. Based on using a mixture of Triclopyr and hexagynin hexon oil, I would allow for \$35 per acre per year in material costs. To account for planning, repeating, application prescription, and supervision, I've proposed an allowance of \$4000/site/year.

Please refer to the table cited for life cycle costing.

Project Site	Acres	Labor (hrs/yr)	Management	Material (\$/yr)	Total (\$/yr)
Strawberry Canyon	68 Acres	\$ 9850	4000	\$ 1650	\$ 16,500
Claremont Canyon	45 Acres	\$ 6716	4000	\$ 1125	\$ 11,841

Respectfully,

Robert Costa, Assoc. Director
Physical Plant

ATTACHMENT E. 114 BIRD SPECIES FOUND BY LOCAL BIRDERS ON MT. DAVIDSON FROM 5/31/11 TO 6/1/12

Date Range	Jun 1, 2011 - May 31, 2012	Total Number of Species	114
Locations	Mt. Davidson	Total Number of Checklists	138

	Jun-11	Jul-11	Aug-11	Sep-11	Oct-11	Nov-11	Dec-11	Jan-12	Feb-12	Mar-12	Apr-12	May-12
Number of Species	69	45	46	60	54	48	27	30	37	45	71	55
Number of Individuals	1,377	748	613	950	628	969	421	314	140	314	1,191	569
Number of Checklists	25	19	8	12	5	10	3	2	4	11	21	18

	Jun-11	Jun-11	Jul-11	Jul-11	Aug-11	Aug-11	Sep-11	Sep-11	Oct-11	Oct-11	Nov-11	Nov-11
Species Name	Species Count	Sample Size	Species Count	Sample Size	Species Count	Sample Size	Species Count	Sample Size	Species Count	Sample Size	Species Count	Sample Size
Double-crested Cormorant - <i>Phalacrocorax auritus</i>	--		--		--		--		1	1	--	
Turkey Vulture - <i>Cathartes aura</i>	1	1	--		--		--		--		--	
Northern Harrier - <i>Circus cyaneus</i>	--		--		--		--		--		1	1
Sharp-shinned Hawk - <i>Accipiter striatus</i>	--		--		--		--		2	2	--	
Cooper's Hawk - <i>Accipiter cooperii</i>	--		--		--		--		--		--	

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Red-shouldered Hawk - Buteo lineatus	1	1	--		1	1	--		--		1	1	
Red-tailed Hawk - Buteo jamaicensis	19	13	11	8	11	8	6	4	--		11	5	
Buteo sp. - Buteo sp.	--		--		--		1	1	--		--		
American Kestrel - Falco sparverius	--		--		--		1	1	3	3	4	4	
Merlin - Falco columbarius	--		--		--		--		1	1	--		
Ring-billed Gull - Larus delawarensis	--		--		--		--		--		2	1	
Western Gull - Larus occidentalis	12	3	--		--		--		--		2	1	
California Gull - Larus californicus	--		--		--		--		--		6	1	
Herring Gull - Larus argentatus	--		--		--		--		--		--		
Glaucous-winged Gull - Larus glaucescens	--		--		--		--		--		--		
gull sp. - Larinae sp.	--		18	2	--		2	1	--		--		
Rock Pigeon - Columba livia	93	7	60	2	15	1	28	4	2	1	11	3	
Band-tailed Pigeon - Patagioenas fasciata	43	10	53	6	3	1	6	2	116	2	283	3	
Eurasian Collared-Dove - Streptopelia decaocto	1	1	--		--		1	1	--		--		
Mourning Dove - Zenaida macroura	21	8	18	4	28	4	75	8	54	3	68	5	
Red-masked Parakeet - Aratinga erythrogenys	--		--		22	2	4	2	8	1	13	2	
Great Horned Owl - Bubo virginianus	--		--		--		--		--		2	1	
Vaux's Swift - Chaetura vauxi	--		--		--		--		52	1	--		

											52		MPLC-2
White-throated Swift - Aeronautes saxatalis	2	2	--	--	--	--	--	--	--	--	--	--	
Anna's Hummingbird - Calypte anna	50	10	36	7	14	3	46	5	14	2	15	2	
Rufous Hummingbird - Selasphorus rufus	--		2	2	3	2	--		--		--		
Allen's Hummingbird - Selasphorus sasin	33	9	18	5	--		--		--		--		
Rufous/Allen's Hummingbird - Selasphorus rufus/sasin	14	3	15	5	41	4	4	2	1	1	--		
hummingbird sp. - Trochilidae sp.	10	2	--		--		37	5	--		--		
Nuttall's Woodpecker - Picoides nuttallii	--		3	3	--		--		--		--		
Downy Woodpecker - Picoides pubescens	3	3	2	2	2	2	4	4	1	1	1	1	
Hairy Woodpecker - Picoides villosus	4	4	7	7	3	3	2	2	1	1	--		
Northern Flicker - Colaptes auratus	--		--		--		--		7	4	1	1	
Olive-sided Flycatcher - Contopus cooperi	38	20	14	14	8	6	--		1	1	--		
Western Wood-Pewee - Contopus sordidulus	20	13	35	17	4	3	2	2	--		--		
Willow Flycatcher - Empidonax traillii	1	1	--		--		--		--		--		
Hammond's Flycatcher - Empidonax hammondii	--		--		--		--		--		--		
Gray Flycatcher - Empidonax wrightii	2	2	--		--		--		--		--		
Pacific-slope Flycatcher - Empidonax difficilis	9	8	--		--		4	3	--		--		

											53	MPIC-2
Pacific-slope/Cordilleran Flycatcher	2	2	--	--	--	--	--	--	--	--	--	
Empidonax sp. - Empidonax sp.	1	1	--	--	--	--	--	--	--	--	--	
Black Phoebe - Sayornis nigricans	--		1	1	4	3	6	6	2	2	2	2
Say's Phoebe - Sayornis saya	--		--	--	--	--	6	4	2	1	--	
Western Kingbird - Tyrannus verticalis	--		--	--	--	--	--	--	--	--	--	
Cassin's Vireo - Vireo cassinii	1	1	--	--	--	--	--	--	--	--	--	
solitary vireo sp. - Vireo plumbeus/cassinii/solitarius	1	1	--	--	--	--	--	--	--	--	--	
Hutton's Vireo - Vireo huttoni	6	4	2	2	1	1	2	2	--	--	2	2
Warbling Vireo - Vireo gilvus	18	7	--	--	3	2	13	4	--	--	--	
Steller's Jay - Cyanocitta stelleri	7	4	13	7	--	--	21	5	1	1	3	3
Western Scrub-Jay - Aphelocoma californica	26	9	9	3	--	--	12	4	--	--	4	2
American Crow - Corvus brachyrhynchos	6	1	--	--	--	--	--	--	2	1	1	1
Common Raven - Corvus corax	4	3	2	1	--	--	11	5	--	--	18	3
Tree Swallow - Tachycineta bicolor	3	3	--	--	--	--	--	--	--	--	--	
Violet-green Swallow - Tachycineta thalassina	--		--	--	--	--	--	--	--	--	--	
Barn Swallow - Hirundo rustica	1	1	--	--	--	--	--	--	--	--	--	
swallow sp. - Hirundinidae	--		--	--	--	--	--	--	--	--	--	

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sp.												
Chestnut-backed Chickadee - Poecile rufescens	34	7	13	4	--		32	4	--		12	2
Bushtit - Psaltriparus minimus	20	3	14	3	--		--		--		23	2
Red-breasted Nuthatch - Sitta canadensis	--		--		--		1	1	--		--	
Pygmy Nuthatch - Sitta pygmaea	25	8	33	5	--		42	4	--		--	
Brown Creeper - Certhia americana	--		--		--		1	1	--		--	
Bewick's Wren - Thryomanes bewickii	1	1	3	3	9	6	6	5	2	2	3	2
House Wren - Troglodytes aedon	--		1	1	4	3	7	7	3	3	4	2
Pacific Wren - Troglodytes pacificus	14	5	29	6	--		29	5	--		15	3
Blue-gray Gnatcatcher - Polioptila caerulea	--		--		--		4	3	--		--	
Ruby-crowned Kinglet - Regulus calendula	--		--		--		1	1	4	2	17	2
Swainson's Thrush - Catharus ustulatus	33	15	4	2	--		1	1	--		--	
Hermit Thrush - Catharus guttatus	--		--		--		--		2	2	10	2
American Robin - Turdus migratorius	94	11	40	6	--		14	4	19	2	54	3
Varied Thrush - Ixoreus naevius	--		--		--		--		20	3	1	1
Northern Mockingbird - Mimus polyglottos	8	4	6	4	1	1	--		3	3	1	1
Sage Thrasher -	1	1	--		--		--		--		--	

												55
Oreoscoptes montanus												
European Starling -	--		10	2	--	--		--		--		
Sturnus vulgaris												
American Pipit - Anthus rubescens	--		--		--	--		1	1	--		
Cedar Waxwing -	7	2	--		2	2	2	1	21	3	7	1
Bombycilla cedrorum												
Orange-crowned Warbler -	9	6	2	2	13	4	9	6	1	1	1	1
Oreothlypis celata												
Nashville Warbler -	--		--		--	--		--		--		
Oreothlypis ruficapilla												
MacGillivray's Warbler -	--		--		--		3	3	--		--	
Geothlypis tolmiei												
Northern Parula -	1	1	--		--	--		--		--		
Setophaga americana												
Yellow Warbler -	12	5	--		7	2	45	5	8	2	--	
Setophaga petechia												
Yellow-rumped Warbler -	--		--		--		4	3	98	4	82	6
Setophaga coronata												
Black-throated Gray Warbler - Setophaga nigrescens	3	2	--		--		--		2	2	--	
Townsend's Warbler -	11	5	--		7	2	8	3	12	4	24	4
Setophaga townsendi												
Hermit Warbler -	--		--		--		3	3	--		--	
Setophaga occidentalis												
Wilson's Warbler -	74	13	17	9	18	6	18	9	1	1	--	
Cardellina pusilla												
California Towhee -	17	9	3	3	--		--		--		2	2
Melospiza crissalis												
Chipping Sparrow -	--		--		--		--		--		--	
Spizella passerina												
Savannah Sparrow -	--		--		--		2	1	--		--	

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											56	MPLC-2
Passerculus sandwichensis												
Fox Sparrow - Passerella iliaca	--		--	--			12	3	16	3	23	4
Song Sparrow - Melospiza melodia	81	9	13	5	--		40	4	10	3	6	1
Lincoln's Sparrow - Melospiza lincolnii	--		--	--			3	3	--		--	
White-throated Sparrow - Zonotrichia albicollis	--		--	--			--		--		--	
White-crowned Sparrow - Zonotrichia leucophrys	118	10	40	5	20	1	82	5	50	1	124	4
Golden-crowned Sparrow - Zonotrichia atricapilla	--		--	--			--		8	1	43	4
Dark-eyed Junco - Junco hyemalis	27	8	12	3	--		6	4	--		17	2
Western Tanager - Piranga ludoviciana	20	10	1	1	1	1	51	7	8	2	--	
Black-headed Grosbeak - Pheucticus melanocephalus	46	14	7	7	6	3	20	8	1	1	--	
Lazuli Bunting - Passerina amoena	70	12	--		2	2	3	3	--		--	
Indigo Bunting - Passerina cyanea	5	5	--	--			--		--		--	
Western Meadowlark - Sturnella neglecta	--		--	--			--		1	1	1	1
Brewer's Blackbird - Euphagus cyanocephalus	10	6	--	--			5	2	--		--	
Brown-headed Cowbird - Molothrus ater	5	3	--	--			--		--		--	
Hooded Oriole - Icterus cucullatus	1	1	--	--			--		--		--	
Bullock's Oriole - Icterus bullockii	--		--	--			--		--		--	

										57		MPIC-2
oriole sp. - Icterus sp.	1	1	--		--		--		--	--		
blackbird sp. - Icteridae sp.	--		--		--		--		7	1	--	
Purple Finch - Carpodacus	10	3	1	1	3	3	--		11	3	8	3
purpureus												
House Finch - Carpodacus	87	10	136	7	300	5	160	4	12	1	--	
mexicanus												
Red Crossbill - Loxia	2	1	1	1	--		--		--		--	
curvirostra												
Pine Siskin - Spinus pinus	3	3	1	1	2	2	9	4	24	3	7	1
Lesser Goldfinch - Spinus	37	6	40	7	46	5	33	5	11	2	15	2
psaltria												
American Goldfinch -	7	3	--		9	2	--		1	1	--	
Spinus tristis												
Spinus sp. (goldfinch sp.) -	--		--		--		--		--		--	
Spinus sp. (goldfinch sp.)												
House Sparrow - Passer	30	6	2	1	--		--		--		18	2
domesticus												

NGCOA-1

**RECEIVED**

DEC 01 2016

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M.E.A.**NATIONAL GOLF COURSE OWNERS ASSOCIATION**

Re: Supporting "Historical Resource" Designation for the Sharp Park Golf Course Significant Natural resource Areas, etc.
DEIR No. 2005.1912E.

Dear San Francisco Planning Department,

01

We are writing to you to inform you that we support the proposed designation of Sharp Park Golf Course as a historical resource of the City and County of San Francisco. As you know, this course was one of the final designs by Alister MacKenzie prior to his death. He is regarded by many as the finest golf course architect in the history of the game with courses like Augusta National and Pasatiempo in Santa Cruz to his credit. Unlike those courses, Sharp Park is affordable and accessible to all people from all walks of life from the community and beyond. There have been many great players like San Francisco's own Ken Venturi and Johnny Miller who developed their games on municipal courses. Take away the public course option and many great and not so great players will never have the chance to pursue this great lifetime sport. In an urban environment, golf courses provide a unique venue for healthy outdoor recreation. Unlike other sports, golf is one that can be pursued by anyone regardless of age, size, or speed. Entire multi-generational families can play this game together.

Sharp Park is a significant contributor to the local economy as a provider of local jobs. Golf courses also positively impact the local economy because they support many local vendors and service providers. Sharp Park, like virtually all golf courses, is a significant contributor through the innumerable charitable events and fundraisers it has hosted over the years.

Golf facilities are tremendous environmental assets that are managed by highly trained and educated agronomists who are careful stewards of the environment. Golf courses provide green space and varied habitat for many species.

In short, this golf course is important to the community in many and varied ways and once eliminated cannot be replaced. We hope that this letter, along with the other expressions of support from both your local community and the other voices in the golf industry will convince you of the historical importance of this irreplaceable community asset.

Sincerely,

Michael K. Hughes

CEO

National Golf Course Owners Association

291 Seven Farms Drive, 2nd Floor, Charleston, South Carolina 29492 • Phone: (800) 933-4262 • Fax: (843) 881-9958 • www.ngcoa.org

NTC-1

Nature in the City
PO Box 170088
San Francisco CA 94117
www.natureinthecity.org



Tuesday, November 1, 2011

Bill Wycko
SF Planning Department
Natural Areas Management Plan
1650 Mission Street, Suite 400
San Francisco CA 94103

Dear Mr. Wycko:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Significant Natural Resource Areas Management Plan (SNRAMP).

By now you are well aware that this has become an incredibly complex issue, not only because the document covers 32 distinct natural areas, each with its own community and environmental context, but also because one of them is Sharp Park, a wholly different animal from the rest. We advocated in 2009 when the Initial Study was released, and we are advocating again, that for many reasons, environmental analysis of Sharp Park should be separated out from the rest of the environmental analysis of the Natural Areas Plan.

01

The Natural Areas Plan goals are excellent. The DEIR describes accurately the environments of the 32 natural areas, and with notable exceptions, does an excellent job analyzing the environmental impacts of the Natural Areas Plan. However, we are concerned that the analysis neglects to fully address the long-term impact of invasive plants from the retention of invasive weed-nurturing eucalyptus groves in the MA-3 areas. The true impacts (and benefits!) of the maximum restoration alternative – one which presumably would restore significant portions of the MA-3 areas – cannot be properly evaluated against the proposed project, since the description is only two pages long. Thus, no such definitive conclusions about relative impacts from invasive plants, i.e., the degree to which they remain a threat to biodiversity, as a function of that alternative versus the Proposed Plan, can be made by the public because there is no substance to the alternative. It is completely general.

02

That the recreation and maintenance alternatives are the "environmentally superior alternatives" and neither the *restoration* nor the proposed project are, may be a function of a misinterpretation of the intent of CEQA, where the protection of wildlife and our natural environment are central to the intent of the legislation. The assumptions made about what defines recreation for this particular DEIR are subjective and not based on best available science about recreation (there are plenty of citations on the web). For the purposes of the SNRAMP DEIR, recreation should include community stewardship, a legitimate form of recreation, practiced by thousands of people every week all over the Bay Area. This could change the balance of purported impacts to

Restoring San Francisco biodiversity, wildlife habitats & corridors, connecting urban people, communities and nature where we live.
Nature in the City is project of Earth Island Institute, a 501(c)(3) California non-profit public benefit corporation.

NTC-1

02 (Cont.) recreation, and could, for example, lead to the proposed project being considered to be the environmentally superior alternative.

The analysis of Sharp Park in Pacifica should be separated from the rest of the analysis of the Natural Areas Plan for the following reasons:

Geography - Sharp Park is in a different county, has a different user group, and has a wholly different regional environmental context.

Proposed Jurisdictional Changes - Some in the community, including Nature in the City, are advocating for Sharp Park to become part of the Golden Gate National Recreation, which currently effectively surrounds Sharp Park on three boundaries.

03 *Ecological Distinction* - Sharp Park is the only RPD Significant Natural Resource Area with two federally listed endangered species; it possesses a much larger flora and fauna than the rest of the 31 areas; and it is the only one with an acute threat of sea-level rise to protected species, valuable wetland habitat, and local communities.

Financial - Sharp Park Golf Course is in a state of uncertainty and instability in terms of whether it can be maintained as a viable and affordable public resource. The problems of dependence on pumping freshwater out of endangered species habitat, on the existence of an old and vulnerable sea wall, and on financial subsidy for golf course function are not sustainable.

Legal - If Sharp Park is not separated from the environmental analysis of the Natural Areas Plan, then litigation is going to hold up finalization and implementation of the Plan for a much longer, indefinite period of time. This is unfair to San Franciscans, who have been waiting for 15 years for the completion of the Significant Natural Resource Areas Management Plan process.

Sincerely,

Peter Brastow
Founding Director
Nature in the City
San Francisco, California

Restoring San Francisco biodiversity, wildlife habitats & corridors, connecting urban people, communities and nature where we live.
Nature in the City is project of Earth Island Institute, a 501(c)3 California non-profit public benefit corporation.

NTC-2

From: Bill Wycko
To: Jessica Range; Sarah B Jones
Cc: Linda Avery; John Rahaim
Subject: Fw: Natural Areas Plan DEIR
Date: 09/30/2011 10:30 AM

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 09/30/2011 10:29 AM -----

Peter Brastow
<pcb123@natureinthecity.org>

09/30/2011 10:06 AM

To bill.wycko@sfgov.org
 cc Linda Shaffer <lshaffer1@comcast.net>, Peter Brastow <pcb123@natureinthecity.org>, Noreen Weeden <nweeden@goldengateaudubon.org>, Jennifer Clary <jenclary@sbcglobal.net>, Steven Krefting <skrefting@igc.org>, Arthur Feinstein <arthurfeinstein@earthlink.net>, Ruth Gravanis <gravanis@earthlink.net>, Greg Gaar <dunetansy@yahoo.com>, Brent Plater <bplater@wildequity.org>
 Subject Natural Areas Plan DEIR

Mr. Wycko,

My, our, frame of reference is the sector of the public who are the stakeholders for a particular DEIR, who, in this case, are overwhelmed with the confluence of environmental documents which have recently hit the streets, including - but not limited to - those associated with:

America's Cup
 GGNRA GMP
 GGNRA/PORE Air Tour MP
 PORE DEIR for Drakes Bay Oyster Company

01

Thus, the CUMULATIVE effect on the stakeholder public is to be overwhelmed by the necessity to participate in all of these processes, thereby potentially diluting effective public participation. Unfortunately, the public is not well-represented in any of these situations because funding for public-serving non-profits is in the toilet.

Thus, your determination is detrimental to the optimization of a robust public process for the Significant Natural Resource Areas Management Plan, the single most important conservation document in the City's history.

Regards,

Peter Brastow
 Founding Director, **Nature in the City**

PO Box 170088

NTC-2

San Francisco CA 94117
415-845-0087
pcb123@natureinthecity.org

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On Sep 30, 2011, at 9:02 AM, bill.wycko@sfgov.org wrote:

We are not the lead agency for the GGNRA/PORE Air Tour Management Plan, and its public comment period is therefore not relevant. Our frames of reference are extensive established practices for the numerous complex DEIRs which we prepare as well as California statutes and guidelines which identify a total period for DEIR review of sixty days as exceptional and appropriate only in unusual circumstances. As I indicated to Mr. Sigg, you can address any further requests for a DEIR review period extension to the San Francisco Planning Commission.

Peter Brastow
<pcb123@natureinthecity.org>

To

bill.wycko@sfgov.org

09/29/2011 04:34
PM

cc

Subject

Fwd: ATMP - Comment Period Extended
to October 21 - WHY NOT FOR THE
SNRAMP?

NTC-2

Greetings Bill,

I found your response to Jake Sigg's request for an extension of the comment period for the SNRAMP to be a bit offensive, rude and patronizing. Not that I even want to address any of your specific points, but do you think that the GGNRA/PORE Air Tour Management Plan is more complex than the Significant Natural Resource Areas Management Plan DEIR, considering the confounding effects of Sharp Park?

I would urge you to reconsider this request at the staff level.

Thank you.

Peter Brastow
Founding Director, Nature in the City

PO Box 170088
San Francisco CA 94117
415-845-0087
pcb123@natureinthecity.org

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Begin forwarded message:

From: Samantha at GGNRA <goga_planning@nps.gov>
Date: September 29, 2011 3:40:37 PM PDT
To: pcb123@natureinthecity.org
Subject: ATMP - Comment Period Extended to October 21
Reply-To: goga_planning@nps.gov

This email best viewed with images displayed.

You are receiving this email because you have expressed an interest in Golden Gate National Recreation Area. Don't forget to add goga_planning@nps.gov to your address book so we'll be sure to land in your inbox!

NTC-2

You may unsubscribe if you no longer wish to receive our emails.

(Embedded image moved to file: pic14605.jpg)GGBridge
banner

Air Tour Management Plan
Comment Period Extended to October 21

Quick Links
Project Documents
FAA Website
GGNRA Home Page

NTC-2

How to Submit Comments
Online

Or,

By Mail To:
Keith Lusk
ATMP Program Manager
Special Programs Staff AWP-1SP, FAA
P.O. Box 92007
Los Angeles, CA 90009-200

Like us on Facebook(NPS, not GGNRA)

Follow us on Twitter
(Embedded image moved to file: pic06617.jpg)
News Release
RSS Feed

(Embedded image moved to file: pic14429.gif)Join Our
Mailing List

Dear Park Friend,

The Federal Aviation
Administration (FAA) and National
Park Service (NPS) announced today
the extension of the public
scoping period to inform the
development of Air Tour Management
Plans (ATMPs) for Golden Gate
National Recreation Area (GGNRA)
and for Point Reyes National
Seashore (the Seashore).

Comments will now be accepted
through October 21, 2011.

NTC-2

If you experience difficulty submitting comments online please send an email to goga_planning@nps.gov with "ATMP" in the subject line.

About the Project

(Embedded image moved to file: [pic26749.jpg](#))View of GG Bridge from bluffs.

The FAA, in cooperation with the NPS, has initiated development of an ATMP for GGNRA and the Seashore. The ATMP for GGNRA will include Muir Woods National Monument and Fort Point National Historic Site, both directly managed by GGNRA, and the San Francisco Maritime National Historical Park.

The objective of an ATMP is to develop acceptable and effective measures to mitigate or prevent significant adverse impacts, if any, of commercial air tour operations upon the natural and cultural resources, visitor experiences and tribal lands within or directly adjacent to GGNRA and the Seashore.

The public, agencies, tribes, and other interested parties are invited to provide comments, suggestions, and input on the scope of issues and range of alternatives to be addressed in the environmental process.

NTC-2

This correspondence can be made available in alternative formats. Please email goga_planning@nps.gov, call (415) 561-4734 or the TTY phone number, (415) 556-2766 to submit a request or to obtain more information on accessibility assistance.

Forward Email

This email was sent to pcb123@natureinthecity.org by goga_planning@nps.gov | [Update Profile/Email Address](#) | [Instant removal with SafeUnsubscribe™](#) | [Privacy Policy](#).
Golden Gate National Recreation Area - Planning | Building 201 - Fort Mason | San Francisco | CA | 94123

(Embedded image moved to file: pic24373.gif)
<pic14605.jpg><pic06617.jpg><pic14429.gif><pic26749.jpg><pic24373.gif>

PGA-1



Allen Wronowski, PGA
President

Ted Bishop, PGA
Vice President

Derek Sprague, PGA
Secretary

Jim Remy, PGA
Honorary President

Joseph P. Steranka
Chief Executive Officer

September 27, 2011

San Francisco Planning Department
Attn: Bill Wycko, Environmental Review Officer
1650 Mission St., #400
San Francisco, CA. 94103

Re: Supporting "Historical Resource" Designation for the Sharp Park Golf Course
Significant Natural Resource Areas, etc. DEIR No. 2005.1912E

Dear San Francisco Planning Department,

01

We are writing to you today to voice The PGA of America's wholehearted support for the proposed designation of Sharp Park Golf Course as a historical resource of the City and County of San Francisco. We feel strongly that as one of renowned architect Alistair MacKenzie's final designs prior to his death, it holds true historic value not only for your region but for the U.S. golf industry as well.

02

We also feel strongly that as a provider of local jobs and as an attraction that can bring golfers to your area from outside your region, there are considerable economic reasons to continue operating Sharp Park Golf Course. The PGA of America is proud to present golf as an important component of local and regional economies as well as a healthy and fun recreational activity that can be enjoyed by young and old, men and women, as a family activity, with friends or business associates, no matter their economic or ethnic background.

Furthermore, municipal golf facilities such as Sharp Park Golf Course are critical to keeping golf affordable and accessible to all who want to participate in this wonderful game. Some of the biggest names in professional golf are products of municipal and military-operated golf courses, as are countless other professional and amateur players. Take away the municipal course option, and many of these highly-successful golfers may never have had the chance to pursue their passion for the game.

Finally, golf facilities across the country have proven themselves to be good stewards of the environment, providing green space and habitat for plants and animals while using considerably less water per acre than developed tracts of land.

THE PROFESSIONAL GOLFERS' ASSOCIATION OF AMERICA
100 Avenue of the Champions | Palm Beach Gardens, Florida 33418
T: (561) 624-8400 | www.pga.com


PGA-1

September 27, 2011

Page 2

In closing, we hope that this letter, along with the wide-ranging support from both your local community and golf industry, will convince you of the importance of the historical designation as well as the benefits of continuing to operate Sharp Park Golf Course.

Very Respectfully,



Allen Wronowski, PGA
President
The PGA of America



Joseph P. Steranka
Chief Executive Officer
The PGA of America

cc: Congresswoman Jackie Speier
Hon. Ed Lee, Mayor, City and County of San Francisco
Hon. Mary Ann Nihart, Mayor, City of Pacifica
David Chiu, President, San Francisco Board of Supervisors
Carole Groom, President, San Mateo County Board of Supervisors
Philip Ginsburg, General Manager, San Francisco Recreation and Park Department
Charles Edwin Chase, AIA, President, San Francisco Historic Preservation Commission
San Francisco Public Golf Alliance

SCBC-1

26 September 2011

To: Bill Wycko
Environmental Review Officer
San Francisco Planning Dept.

RE: Request for comment deadline extension

We have reviewed the Significant Natural Resource Areas Management Plan DEIR, a large and complex document covering 32 natural areas, including areas with ancillary complicating issues, such as Sharp Park. All of the signatories to this letter have long and extensive involvement with these lands and expert knowledge and familiarity with their management problems. We find discrepancies, even contradictions, in the DEIR.

01

We appreciate the great amount of work that went into preparing this document, particularly when its preparation coincided with that of other documents such as the America's Cup DEIR. We, too, are heavily involved in commenting on these issues, as well as on the proposed revision of the Recreation & Open Space Element of the General Plan, and we find that their adequate address is beyond our capabilities in the time allowed.

We therefore request that we be given an additional two months to process the large volume of information and form thoughtful and useful comments.

(Signed)

Arthur Feinstein
Sierra Club Bay Chapter

SCBC-1

Casey Allen, President
California Native Plant Society Yerba Buena Chapter

Noreen Weeden, Volunteer Coordinator
Golden Gate Audubon Society

Jennifer Clary, President
San Francisco Tomorrow

Brent Plater, Executive Director
Wild Equity Institute

Peter Brastow, Executive Director
Nature in the City

Steven Krefting
San Francisco League of Conservation Voters

SFDOG-1

RECEIVED AT CPC HEARING

2005.1912E

J. Range

NAP EIR**San Francisco Planning Commission****October 6, 2011**

My name is Sally Stephens and I am the Chair of the San Francisco Dog Owners Group. Urban parks are for people. They are our collective backyards, places where we go to play with our kids and our dogs, or simply to sit in the sun. We have so little open space in San Francisco, we cannot afford to lock 1/3 of it away in plant museums – you can look but you cannot enter – which is what the Project and the Maximum Alternatives would do. SFDOG supports the Maintenance or Maximum Recreation Alternatives because they protect existing natural areas yet preserve access for people.

The EIR incorrectly states the number and total acreage of off-leash Dog Play Areas (or DPAs). There are actually 29, which cover about 120 acres total. But 80% of that total is either within or adjacent to a natural area and is therefore at risk of future closure if NAP claims impacts from the dogs. Many were designated as DPAs years before NAP came around, yet, with a simple stroke of a planner's or a NAP staffer's pen, they can be gone.

If you're going to force people out of their parks, you better have a good reason. The NAP EIR repeatedly says dogs MAY have an impact, but there is no evidence cited in the EIR that dogs are now or ever have done so. EIR's must be based on documented impacts, not hypothetical conjectures. Specific proof of impacts, not just claims of "observations" with no details, must be added to the NAP EIR. Give us unbiased, proven facts or don't kick us out.

NAP has become a way to get rid of DPAs in city parks, since the only real remedy from the alleged impacts from dogs is closure of the DPA. As such, the EIR must consider the impact of those closures on the human and urban environments, not just the natural environment. Throughout the EIR, dogs are described solely as "nuisances." The EIR does not consider any benefits of dogs and off-leash dog walking to people and communities. The NAP EIR must consider impacts on the physical and emotional health

SFDOG-1

Sally Stephens, SFDOG Comment on NAP EIR, October 6, 2011

04
(Cont.)

of people who can no longer walk their dogs in closed DPAs, and on the sense of neighborhood and park community that will be impacted if DPAs are closed or significantly reduced. Yet it does not.

05

This is particularly important with the Maximum Restoration Alternative that will essentially close DPAs at McLaren Park, Bernal Hill, Buena Vista Park, and Lake Merced. These DPAs constitute roughly 75% of the total legal off-leash area in SF city parks. The EIR does not adequately analyze the impact of that level of closure on the remaining DPAs and other nearby parks, especially when combined with the Golden Gate National Recreation Area's plan to close 90% of its off-leash space. The dogs and dog people aren't going to just go away, or be quietly forced out of our city parks.

These are just a few of our concerns. We're still analyzing the EIR, and will submit an expanded, detailed written comment next week.



Sally Stephens

Chair, SFDOG

415-577-9646 cell

sally.stephens.sf@gmail.com

SFDOG-2



San Francisco Dog Owners Group

October 30, 2011

Bill Wycko, Environmental Review Officer
 SF Planning Dept
 1650 Mission St., Suite 400
 San Francisco, CA 94103

RECEIVED
 OCT 31 2011
 CITY & COUNTY OF S.F.
 PLANNING DEPARTMENT
 RECEPTION DESK

RE: COMMENT ON SIGNIFICANT NATURAL RESOURCE AREAS MANAGEMENT PLAN EIR

I am writing this public comment on the Significant Natural Resource Areas Management Plan EIR (NAP EIR) as Chair and representative of the San Francisco Dog Owners Group. SFDOG is the largest citywide dog owners/guardians group in the city, with a thousand active members, and at least a thousand more that we reach regularly through our emailed newsletters and listserves. SFDOG pushes for responsible dog guardianship, and advocates for off-leash recreation for dogs that are under voice control. We are a 501(c)(3) nonprofit, and work to educate dog guardians, non-dog people, and elected and appointed officials about responsible dog guardianship and the benefits of having a dog in our modern, often isolated, society.

01

SFDOG is very concerned about poor outreach by the Planning Department and the Recreation and Park Department to the public about the NAP EIR. There was no mention of the NAP EIR on either the SF Recreation and Park Department website, nor on the Natural Areas Program website. Neither site had a link to the Planning Dept website where the NAP EIR was located. We heard frequently from people who tried to find the NAP EIR to read it, couldn't find it on the Rec and Park website, and had no idea where else to look for it. In addition, there was no official notice posted in parks most affected by the NAP, for example, on Bernal Hill (where part of the DPA will be closed by NAP).

02

In addition, the Planning Commission's hearing on the NAP EIR on October 6 was another case of poor outreach. The Planning Department's website (where the EIR was posted) listed the hearing as beginning at 1:30 pm. This start time was posted even on October 6th itself. The only way to find out that the hearing time had been changed was to look at the meeting agenda. While the original agenda that was posted had the 1:30 pm starting time, at some point the agenda was changed to reflect the noon starting time. I happened to check the agenda on Monday, October 4 and noticed the change. But many people did not. I was at the Commission meeting and the NAP EIR item was over largely by 1:30 pm, the original starting time. Many people showed up for the Planning Commission meeting just after 1:30 pm, intending to speak about the NAP EIR but, because the agenda item was already over, they were denied the chance to give oral public comment. It is important for decision makers and Commission members to *hear* public comment, not just read it, to hear the passion in people's voices as they speak. By changing the starting time of its October 6th meeting and not letting people know, the Commission essentially denied people the chance to give oral public comment on the NAP EIR.

When the problems with the hearing time are combined with the poor outreach described above, it is clear that the Planning Department cannot continue with the EIR process. Planning should re-start the public comment process with better outreach to ensure the comment process is fair and accurately reflects the public's opinions. I shall continue, however, with this comment.

P.O. Box 31071 • San Francisco, CA • 94131-0071

tele: 415.339.7461 • e-mail: info@sfdog.org • web site: www.sfdog.org

SFDOG-2

SFDOG Comment on NAP EIR 10/31/1

SFDOG feels that the NAP EIR is inadequate for the following reasons:

- 03 1) The NAP EIR provides no evidence to prove claims that dogs have an impact on plants and wildlife in natural areas. In its comment on the Initial Study, SFDOG noted that there is no scientific consensus that dogs have any impact on plants and wildlife, including nesting birds, in city parks and listed scientific citations for research that showed no impacts from dogs. There is no indication in the NAP EIR that those studies were included, since the NAP EIR accepts the premise, without any evidence to support the premise, that dogs cause impacts. There was no acknowledgment that studies that show otherwise were ever considered in the NAP EIR. In addition, our comment on the Initial Study warned about considering studies that claim impacts from “free-roaming” dogs, since that means dogs that are running without any human control (for example, a dog that accidentally got loose without its owners knowing so there was no human in the park to handle or control the dog). Off-leash dogs are NOT free-roaming, since they come to parks WITH humans who can control their behavior and activities. There is no indication in the NAP EIR that this warning was heeded, since we don’t know what research the EIR used to back its premise that dogs cause impacts. An EIR should be based on scientific evidence, and there is little presented here to justify any claims of impacts. Because the NAP EIR’s analysis of impacts from dogs is not based on any evidence, the analysis is incorrect and inadequate. Without any demonstrated evidence of impacts from dogs, there is no justification for excluding people with off-leash dogs from natural areas. There is, therefore, no justification for the closure of the DPA at Lake Merced, nor for the reductions in the DPAs at McLaren Park and Bernal Hill.
- 04
- 03 (Cont.) 2) The NAP EIR repeatedly says: Dogs MAY be impacting protected plant species or wildlife (pp. 297, 298, 305, 306, 472, 473, 502, 517), yet offers no evidence these impacts are actually occurring or ever have occurred. Unsubstantiated claims cannot be made in an EIR. After each of these examples, the EIR then goes on to say: Dogs MAY continue to impact plants or wildlife. If there is no proof of an impact, then that impact cannot “continue.” EIRs must be based on observed impacts, not things that “may” happen. The analysis in the EIR based on this speculation is incorrect and inadequate.
- 3) In several places, the NAP EIR says: Observations indicate dogs are impacting erosion, or plant damage, or damage to natural communities (pp. 471, 500, 505, 516, 519), yet offers no information on these “observations.” Who made them? Were they done in a scientifically rigorous way? Were they made by people biased against dogs? We have seen with the GGNRA’s attempts to get rid of dogs and with Point Reyes attempts to get rid of an oyster farm that reports by “observers” biased against dogs or oyster farmers do not stand up to independent scientific scrutiny. Is this the case here as well? We do not know, since the NAP EIR provides no information about them.
- 05 In our comment on the Initial Study, SFDOG pointed out the EIR should re-analyze any data provided by NAP staff, especially data not published in a peer-reviewed journal, to ensure that conclusions against dogs are actually supported by the data. Because no data – only the word “observations” – is included in the NAP EIR, we don’t know if there was any analysis of the observations to ensure they say what NAP staff claim they do.
- This is not just paranoia. In May 2006, 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

SFDOG-2

SFDOG Comment on NAP EIR 10/31/11

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). Data presented in both studies show no impact of off-leash dogs on the numbers of plovers. Indeed the maximum number of plovers observed on Ocean Beach (54) was recorded in 1994, a time when off-leash dogs were not restricted on Ocean Beach. Yet the conclusion drawn in the report is that off-leash dogs have to be restricted to “protect” the plovers.

05
(Cont.)

Again, EIRs should be based on solid, scientific data, and definitely not on anecdotal “observations.” If an EIR is based on anecdotal evidence, its analysis cannot be trusted and is inadequate.

06

- 4) The NAP EIR does not differentiate between impacts caused by people with dogs and impacts caused by people without dogs. Do people in the natural areas with dogs cause significantly more impacts than people in the natural areas without dogs? Clearly a 200-pound person walking on a trail will have a much more significant impact on plants than a 20-pound dog walking (or even running) on the same trail. Because this was not evaluated in the EIR, the analyses presented in the NAP EIR are inadequate. If there is little difference in impacts, then the EIR cannot be used to justify banning dogs from the natural areas and this point should be clearly stated.

07

- 5) The NAP EIR considers only the NAP plans to close roughly 15% of the legal off-leash space in SF city parks (closure of Lake Merced DPA and reductions in DPAs at McLaren Park and Bernal Hill) when considering impacts on the remaining DPAs and on recreation. However, the NAP plan also calls for expanding the most sensitive areas within natural areas, and monitoring the DPAs in four parks – McLaren and Buena Vista parks, Bernal Hill, and the Golden Gate Park Oak Woodlands – to look for any impacts from dogs on the natural areas in these parks. These DPAs, combined with the one at Lake Merced that will be closed by NAP and DPAs at Pine Lake and Corona Heights that are located immediately adjacent to a natural area, constitute roughly 80% of the total off-leash area in SF city parks. Therefore, NAP claims of impacts from dogs could result in the closure of up to 80% of the legal off-leash space in city parks. These added closures will significantly increase the impacts on recreation, on people with dogs, and on the remaining DPAs. These increased impacts from the loss of 80% of legal off-leash space were not considered in the EIR when it evaluated the Project Alternative, and without them, the analysis of the Project Alternative is incomplete and inadequate. All analyses of impacts on recreation, transportation, global warming, and climate change (from increased driving because of DPA closures) must be done using the 80% loss that is quite possible, given NAP’s historic antipathy toward dogs and dog walkers.

08

- 6) The NAP EIR acknowledges that the NAP plans to close 15% of the DPAs in city parks immediately, when added to the GGNRA’s plans to cut off-leash access by 90%, will have a significant and unavoidable cumulative impact on remaining off-leash areas in city parks and on recreation. However, the EIR says that because they don’t know the final GGNRA plan, they cannot analyze what that cumulative impact will be. We do know what the GGNRA originally proposed (cutting off-leash access on its lands by 90%) and the cumulative impact of that plan, when combined with the NAP closures (especially the possible closure of 80% of DPAs) can and should be analyzed in the NAP EIR. We saw on Tsunami Friday what the impacts could be. The GGNRA closed both Fort Funston and Ocean Beach to all visitors on the morning of Friday, March 11, 2011 because of concerns that a tsunami triggered by a major earthquake in Japan would strike the coast. On Tsunami Friday, a Rec and Park Dept staffer counted over 200 dogs at the Pine Lake DPA at 10 am, almost 10 times more

SFDOG-2

SFDOG Comment on NAP EIR 10/31/11

- 08
(Cont.) { dogs than on a normal weekday (normally about 20 dogs at one time) and more than 3 times the maximum numbers of dogs seen on busy weekends (about 60 dogs at a time). This example can be used to quantify the cumulative impacts of the GGNRA and NAP closures of off-leash space. The effects of Tsunami Friday were mentioned in an article in the March 2011 issue of the *West Portal Monthly*. The analysis presented in the EIR, which does not contain this, is inadequate.
- 09 { 7) The number of DPAs in city parks listed in the NAP EIR is wrong. Page 155 says there are 19 DPAs, when the actual number is 29. To get such a basic fact wrong is shocking and calls into question other information about dogs, such as their alleged “impacts” on plants and wildlife.
- 10 { 8) The NAP EIR incorrectly summarizes RPD’s so-called moratorium on creating new DPAs until a systemwide survey of DPAs is conducted. The NAP EIR says that this moratorium was a directive from the Rec and Park Commission that was announced at the October 10, 2006 meeting of the RPD Dog Advisory Committee (DAC). This is not true. The idea of a systemwide survey of where dogs and DPAs are in San Francisco came not from the Commission, but from RPD staff. It was not discussed at the October 2006 DAC meeting. It was not fully discussed in the DAC until 2007 when RPD made the decision to “sunset” the DAC and conduct a citywide survey. While the survey was being conducted, the DAC was told, there would be a temporary hold on new DPAs. The DAC was told the survey would take maybe a year or a year and a half at the most. The idea of the citywide survey was not presented to the Rec and Park Commission until mid-2007. This was no “direction from the Commission.” The Commission was only called upon to agree to sunset the DAC. The hold on new DACs was never meant to be permanent. Yet the NAP EIR implies it will last for decades (the length of time covered by the NAP EIR) and therefore the EIR does not have to consider new DPAs. In the four years since the DAC was sunset, however, RPD has done nothing on the citywide survey. And now this inaction by RPD is being used to prevent the EIR from considering whether or not creating new DPAs to replace ones closed by NAP could decrease the impacts of the closures. The NAP plan will last for decades, and for the NAP EIR not to consider a major mitigation like opening new DPAs to replace closed ones is absurd. Any analysis of alternatives that does not include this possible mitigation is inadequate.
- 11 {
- 12 { 9) The NAP EIR assumes that, because the DPAs at McLaren Park and Bernal Hill are not being closed completely, the proposed immediate closures in those parks (13% at McLaren, 29% at Bernal Hill) will not cause a significant number of people to drive to other parks to walk their dogs. People will just walk in different parts of the parks that are still off-leash, the EIR assumes. However, the NAP EIR does not take into account the topography of the remaining land in the two DPAs. If what is left is mostly steep hills, people will not be able to walk there with their dogs. Thus, even though the acres of off-leash space may remain relatively high in these two parks, the amount of space that is practically available for off-leash access may be much less. This will increase the impacts on recreation and also will make it more likely that people will be forced to drive to other parks to walk their dogs off-leash. Topography must be included in the analysis of any and all alternatives. Since it is not, the analysis in the NAP EIR is inadequate.
- 13 { 10) The NAP EIR does not adequately consider the impacts of the use of herbicides, especially Garlon, on dogs who walk either within or adjacent to natural areas (this applies whether the dog is walked on- or off-leash). In a paper on the effects of Garlon, the Marin Municipal Water District (http://www.marinwater.org/documents/Chap4_Triclopyr_8_27_08.pdf) notes that Garlon can cause kidney problems in dogs because of their limited physiological ability to excrete weak acids such as those in Garlon in their urine (they are somewhat unique among mammals in this inability). The NAP’s reliance on repeated use of herbicides to speed the removal of non-native plants in natural areas will have a negative impact on the health of dogs walked where it is applied. This is especially true in Glen Canyon, where NAP sprays Garlon in places where children, seniors and dogs walk regularly. In addition, there is concern that the coyotes who make Glen Canyon their home may have similar kidney problems from exposure to Garlon (indeed their exposure would likely be higher than for dogs because they cannot read the signs that tell people to stay out of areas when pesticides are applied and so will walk through these areas soon after applications). The health impact on dogs of repeated exposure to

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Garlon was not considered in the Hazards and Hazardous Materials section and should be included.

- 07 (Cont.) { 11) The NAP EIR says that the impact of people driving to other parks to walk their dogs because of the immediate closures of the roughly 15% of the total off-leash space in city parks (at Lake Merced, Bernal Hill, and McLaren Park) will be less than significant because there will remain sufficient off-leash space in those parks (except for Lake Merced, which will be completely closed). However, the EIR does not consider the impact of people driving to other parks if 80% of the legal off-leash space in city parks is eventually closed because NAP claims impacts from dogs (80% of the total off-leash areas in city parks are located either within or adjacent to natural areas). This must be included in the analysis of the Project Alternative, and will likely show a much more significant impact than what the EIR now shows.
- 14 { 12) The NAP EIR refers to dogs as “nuisances”. The EIR does not consider any positive aspects of dog walking, including the physical and mental health benefits to people who walk with their dogs. This lack is especially noticeable in sections dealing with impacts on recreation of the various alternatives considered. The reason so many people walk their dogs off-leash in Bernal Hill and McLaren Park is that those areas are large enough that people can hike long distances with their dogs off-leash. The majority of DPAs in city parks are too small for similar hikes. You can play fetch with a dog in these smaller DPAs, but not take a long walk. You cannot have the same recreational experience in a small DPA that you can have in a larger one; DPAs are not interchangeable. This difference in DPAs creates a significant impact on the recreational experience for dog walkers if the DPAs in Bernal Hill or McLaren Park are reduced or closed, and this is not included in the NAP EIR. In addition, there would be a significant negative impact on the physical and mental health of dog walkers if 80% of off-leash space were closed because NAP claims impacts from dogs. This is not considered in the NAP EIR, which is inadequate without it. These negative impacts on the physical and mental health of dog walkers of the 80% closure will be amplified considerably when combined with closures of off-leash in the GGNRA. This must be considered in the cumulative impacts sections.
- 14 (Cont.) {
- 15 { 13) The NAP EIR does not adequately analyze mitigations other than closing the DPA should any impacts from dogs be proven. Fences are mentioned briefly, while DPA closures are featured prominently in the EIR. Other mitigations – education, signage, more extensive fencing, etc. – are not discussed. NAP seems to go straight from a single impact to closing the DPA.
- 16 { 14) The NAP EIR states that impacts to land use planning can be considered significant if they have a “substantial impact on the existing character of the vicinity.” (p. 176) In all of its analysis of impacts on the existing character of the vicinity, the NAP EIR never considers the impact on the social community of people who walk with their dogs in the portions of DPAs that NAP wants to close. This community, in many cases, defines the “existing character” of the park. Dog walkers are perhaps the most common and most diverse group of park users. If you watch dog walkers in SF city parks, you will see kids and seniors, people with disabilities, gay and straight, every ethnic and religious group, and every socioeconomic class walking, talking and laughing together, all united by their common love of dogs. There are few places in San Francisco where you will see so many different types of people interacting without rancor. People who walk in the same park at the same time every day know their fellow dog walkers. These friendships extend outside the park into the neighborhoods, helping create the sense of belonging to a community that is so important in today’s impersonal urban society. Closures and reductions in DPAs (especially if 80% of the total off-leash space in city parks are closed) will have a significant negative impact on these social communities. DPA closures will destroy these communities. Because the NAP EIR did not consider these impacts on community of those who live near and walk in parks, it is inadequate.
- 17 { 15) The NAP EIR does not adequately consider the impacts on the social fabric of San Francisco if one-quarter of its city parklands are closed to residents. Natural areas are not generally accessible to people, whether they have a dog or not. The NAP plan calls for the closure of many trails and reduction of recreational access. You cannot play catch with your child, have a picnic lunch, or play with a dog in a natural area. It can only be a plant museum. The EIR does not adequately consider the significant

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(Cont.)

impact on families and the sense of shared community that access to parks fosters in our urban setting.

18

16) The NAP EIR does not adequately analyze the impacts on recreation of NAP plans to plant sensitive plant species (those that are listed as either endangered or threatened) throughout its natural areas. These plants, by virtue of their special status, trigger automatic federal and state protections, the primary one of which is severe restrictions on access to people (and dogs). The NAP goal to preserve existing remnants of historical habitat does not require the planting of threatened and endangered species. There are plenty of native species that are not threatened or endangered that can be planted in San Francisco's urban parks to give people a sense of what San Francisco's historical habitat was like. Ecologists have noted that planting a few sensitive species plants does little to preserve the species. It is not an ecological decision; it is a landscaping decision. So why does NAP feel it should plant so many sensitive species when it knows their mere presence will "require" NAP to restrict access to its lands? The NAP EIR should consider the major negative impact on recreation that planting threatened and endangered species causes in its analysis of the Project Alternative and other alternatives.

19

17) The NAP EIR does not consider the impact on public safety if DPAs are closed, and especially if 80% of the legal off-leash space is ultimately closed. People with dogs are major park users in nearly every park. They are in the parks at all hours of the day (and often into the night), in rain or shine. Public safety officials have known for years that a well-used park is a safe park. People (and especially those with dogs) convince drug dealers, gang bangers, rapists, robbers and other "bad actors" to go somewhere else to commit their crimes. By kicking out people with dogs, the parks will have significantly fewer people in them, and criminals will have less fear of being observed. Prospect Park in New York City was a well known drug dealing haven in the early 1970s (there were even movies made about it). In an article in the September 29, 2005 edition of the *New York Daily News*, Tupper Thomas, who was appointed the New York City Parks Administrator in 1980, was quoted as saying, "Everybody was terrified of Prospect Park. I remember going around to several schools with a park ranger and telling the principals that if they brought their schoolchildren to the park, I would assign them their own personal ranger to make sure nothing happened to them." Today, Prospect Park hosts several million visitors annually. According to the article, dogs deserve a lot of the credit for the turnaround. Despite the threat of muggings, people with dogs still used the park. In 1982, the NYC Parks Department started ticketing people with dogs in Prospect Park. They complained and in response, the Parks Department came up with a timed-use policy – dogs could be off-leash in the park from 9 pm to 9 am. In the article Thomas goes on to say, "That dog group became a symbol that it was safe to come to the park. It made an enormous difference. Runners started seeing people in the park, so people started running in the park rather than around it. Over time, because there were people coming to the park, the park came back to the people." The NAP EIR has to consider the negative impacts on public safety of forcing major park users out of large portions of city parks, especially with the potential 80% closures of DPAs. Force the people with dogs out, and there will be no one in the parks to challenge the drug dealers, gang bangers, and others who pose a real public safety threat, and the parks will ultimately become less safe.

20

18) The NAP EIR does not consider impacts on recreation and land use from the fact that NAP controls the entire park in over half of the parks (18 of 32) where there is a natural area. No other recreational use is possible in those parks. In an additional 10 parks, NAP controls over 50% of the land. Only four of the 32 parks with natural areas have less than 50% of their land controlled by the NAP. A majority of land under NAP control (57%) will have significant restrictions to access by all people (not just people with dogs); that is the amount of land designated as MA-1 and MA-2. In 8 parks, all of the land in the natural area is designated as MA-1 and MA-2, with resulting significant restrictions on access to the entire park by everyone. In some cases, this denial of access will be in the only park within easy walking distance in the neighborhood. The NAP EIR must consider the impact of this large-scale denial of access on recreation and people (not just those with dogs) having to drive to another park to play catch with their kids when analyzing the Project Alternative and other alternatives.

21

19) The NAP EIR does not adequately consider the negative impacts on aesthetics and land use of poor maintenance in natural areas. In most parks, the NAP plan allocates fewer than 20 days/year for planting/maintenance of the natural areas. In 16 of the 32 natural areas, the total maintenance planned

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SFDOG Comment on NAP EIR 10/31/11

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(Cont.)

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. The NAP EIR should have considered the impacts of scaling back the program to a few areas that can be well maintained, as opposed to the current plans to take over one-quarter of San Francisco's city parkland (1/3 if you add in Sharp Park in Pacifica). The NAP plan is 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. This must be considered in the NAP EIR when considering aesthetics and maintenance.

22

20) The NAP EIR does not consider the negative impact on aesthetics of NAP management decisions. 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. Because these impacts were not considered, the NAP EIR is inadequate.

23

21) The NAP plans call for cutting down over 18,000 healthy trees simply because they are not native. The NAP EIR does not adequately consider the long-term impacts on climate change and global warming of the conversion of land covered by trees with grasslands. Trees are much better at carbon sequestration than grasslands, and the long-term consequences of this difference are not adequately considered in the NAP EIR.

24

22) The NAP EIR does not adequately consider the fact that the climate in San Francisco has changed (and continues to change) from the time several hundred years ago that the NAP plan is trying to re-create. Native plants suited to the earlier climate may no longer be suited to today's (nor tomorrow's) climate. The NAP EIR does not consider the lack of sustainability of trying to re-create what the habitat was at one snapshot in time considering that the climate has changed since that time, and will be continuing to change in the near future. The environmental consequences (for example, more herbicides, etc.) of trying to force the old habitat into today's (and tomorrow's) climate should be analyzed more thoroughly.

The cumulative impact of all the issues identified above show that the NAP EIR is inadequate. It must be redone. The process to take public comment on the NAP EIR was also inadequate. It too must be redone.

Sincerely,



Sally Stephens
Chair

SFFA-1

Lynch, Laura

From: eric <emiller1@gmail.com>
Sent: Tuesday, May 15, 2012 9:00 PM
To: Range, Jessica
Subject: Deficiencies in DIER notification for Natural Resources Area Management Plan -
Corrective Action Required
Attachments: ltr wycko range sf planning 5-14-12.pdf

Dear Ms. Range--

01

Attached is a letter from the San Francisco Forest Alliance requesting that you amend your notice for the Draft DER for the SNRAMP. We have asked for a formal response by no later than Friday, given the short comment period just established. We would be happy to discuss our proposal for resolving our concerns about the previous notice by telephone this week if that would be helpful to you.

We look forward to hearing from you.

Eric Miller
President
San Francisco Forest Alliance

SFFA-1



San Francisco Forest Alliance

Preserving Public Parks for the Public

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May 14, 2012

Via Email and U.S. Mail

Bill Wycko
Jessica Range
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

Dear All:

The San Francisco Forest Alliance is a nonprofit group that was recently formed to give a unified voice to neighborhood groups and citizens in matters relating to the stewardship of San Francisco's park and recreation lands. In that regard, we are writing to ask you to rectify immediately deficiencies in the notice of completion for the Draft Environmental Impact Statement ("DEIR") prepared for the Natural Resources Area Management Plan Project (Planning Dept. File No. 2005.0912E) (the "DEIR Notice").

1. Notice - What The Law Requires¹

(a) CEQA

CEQA requires public involvement to ensure that environmental impacts are considered in governmental-decisionmaking *before* action is taken. Public agencies are required to have in place procedures that will ensure wide public involvement, both formal and informal, in order to receive and evaluate public reactions to environmental issues related to the agency's activities.² Notice must be given in sufficient time so that the public has notice of the full review period.³

¹ The below description of relevant laws is illustrative only, not exhaustive.

² See Berkeley Keep Jets Over the Bay Comm. v. Board of Port Comm'rs, 91 Cal. App. 4th 1344 (2001); Rural Land Owners Ass'n v. City Council, 143 Cal. App. 3d 1013 (1983); Sutter Sensible Planning Inc. v. Board of Supervisors, 122 Cal. App. 3d 813 (1981); Cleary v. County of Stanislaus, 118 Cal. App. 3d 348 (1981).

³ Gilroy Citizens for Responsible Planning v. City of Gilroy, 140 Cal. App. 4th 911, 922 (2006).

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CEQA's statutory and regulatory provisions set for the *minimum* notice requirements for government projects that may have an impact on the environment. CEQA provides that notice of a DEIR comment period can be accomplished through: (1) publication in the newspaper of largest circulation in the areas affected; (2) posting of notice on and off the site in the area where the project is to be located; (3) direct mailing to owners and occupants of parcels contiguous to the project parcel. In some cases, one form of notice may be sufficient, but in others, all three forms of notice may be required. In addition, other laws also impose additional notice requirements. In light of this and CEQA's goals of meaningful public participation, CEQA also provides that "the lead agency may also employ any other means of notification it desires to use."⁴

(b) Due Process

In instances where a project substantially affects constitutionally protected interests, due process requirements also must be met. In such cases, due process requires that notice be "reasonably calculated to afford affected persons the realistic opportunity to protect their interests."⁵ Such notice must "occur sufficiently prior to a final decision to permit a 'meaningful' predeprivation hearing to affected landowners."⁶

(c) San Francisco Forestry Ordinance

San Francisco's Urban Forestry Ordinance provides that before the City removes a tree, it must give 30 days' prior written notice to all interested San Francisco organizations and all owners and occupants of properties that abut, or are on or across from the block face where the affected tree is located. If any person appeals the notice, the City must hold a hearing to consider public testimony on the tree removal. Written notice of the date, time and place of the hearing must be posted on the affected tree, provided in a newspaper of general circulation, and sent to the objecting party, the owner of the property abutting the tree, and all interested organizations.⁷

(d) San Francisco Planning Code

The San Francisco Planning Code requires that neighboring property owners be notified of projects that involve property demolition and alteration. Neighborhood notification is mailed to neighbors within 150 feet of the subject property and relevant neighborhood groups for a 30-day public review period.⁸

⁴ See CEQA statute and guidelines.

⁵ Horn v. County of Ventura, 24 Cal. 3d 605, 617-18 (1979).

⁶ *Id.*

⁷ *E.g.*, San Francisco Public Works Code, Section 806.

⁸ *E.g.*, San Francisco Planning Code, Sections 311 and 312.

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2. *Why The Notice Procedures Followed For The DEIR Are Inadequate*

We are aware that notice of the completion of the DEIR was published in October 2011 and more recently noticed again in late April, but we believe such notice is, in light of the facts of the proposed project, legally deficient.

The DEIR contemplates *major* changes to parks that are used daily by thousands of San Francisco residents, and yet, according to our own research, very few park users know that the City has systematic and wide-scale plans to actively and permanently alter the landscape, recreational features, public uses and flora and fauna of the parks they visit every day. In addition, adjacent and other nearby property occupants and owners have not been notified of completion of the DEIR, despite the fact that the project will have a significant impact on them and their property interests.

Thirty-one parks, including a total of over 2,700 acres, and representing (with the exception of Golden Gate Park and areas managed by the federal government) substantially *all* of the recreational space of San Francisco's more than 800,000 residents are, according to the DEIR, slated to undergo radical change in pursuit of the misguided utopian goal of returning these areas to their natural pre-colonial state.

The impacts of the proposed project are significant and too varied to list here, but include cutting down over 18,000 trees, closing or relocating over 54,000 feet of trails, increasing use of pesticides to kill "invasive" species and protect "native" plants, and diversion of City funds from other recreational programs (e.g., kids' educational activities) and improvements, such as renovation of neighborhood restrooms, playgrounds, and clubhouses. Such actions will impact not only park users, but also resident bird, animal and plant species.

The potential impact of the proposed project on neighboring property owners is nothing short of devastating. Owners who purchased homes in view of city parks stand to have their homes devalued by deforestation. Other owners, for example those abutting the west side of Mount Davidson, are likely to face significant drainage and erosion problems as a result of alterations to the landscape. For other owners, property values (and enjoyment of life in the City) may be decreased by the loss of neighborhood trails, trees, play areas and dog-accessible areas.

The City has done virtually nothing to inform residents near affected areas about the proposed project. By comparison, when UCSF developed plans to remove trees in Mount Sutro Forest, it notified affected neighborhoods with flyers detailing the proposed nature and timing of the work, and held a neighborhood meeting at which they took comment from interested parties.

While we appreciate that the City has made efforts to notify neighborhood groups of the proposed project, we do not believe that such groups adequately represent the interests of those who live and recreate in San Francisco. In this regard, it is important to remember that the resources that are to be altered as part of the project are in fact legally *owned* by San Francisco residents. The City is a mere *trustee* for these resources, on their behalf.

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(Cont.)**3. Correcting The Deficient DEIR Notice**

We recommend and request that the following steps be taken to correct the deficient DEIR Notice:

1. Revise the notice mailed out on April 27th to include Table 5 (Summary of Natural Areas Management Plan) from page 114 of the DEIR,⁹ a copy of which is enclosed with this letter.
2. Hold at least one public hearing on a date approximately halfway through the comment period, and include time and place for the hearing in the revised notice.
3. Mail the revised notice to property owners and occupants within 150 feet of parks impacted by DEIR, and all others who, prior to issuance of the new notice, express, or have in the past expressed, an interest in the DEIR.
4. Post notice at all affected park trail and road entrances and exits, and in other highly visible locations such as at playgrounds, and near restrooms and dog run areas.
5. Extend the comment period to 60 days after the notice will have been accomplished pursuant to 3 and 4 above.

We would like to discuss these requests with you at your earliest convenience, especially in light of the fact that under the April 27th notice, the period for comments is set to expire on June 11th. We would like a written commitment from the City by May 18th that it will comply with the steps outlined above.

We would be happy to meet with you to discuss these steps further or discuss them by telephone or email.

Sincerely,

Eric Miller
President, San Francisco Forest Alliance

cc:	San Francisco Mayor Edwin M. Lee	San Francisco Supervisor Eric Mar
	San Francisco Supervisor Mark Farrell	San Francisco Supervisor David Chiu
	San Francisco Supervisor Carmen Chu	San Francisco Supervisor Christina Olague
	San Francisco Supervisor Jane Kim	San Francisco Supervisor Sean Elsbernd
	San Francisco Supervisor Scott Wiener	San Francisco Supervisor David Campos
	San Francisco Supervisor Malia Cohen	San Francisco Supervisor John Avalos

⁹ It is acceptable to us to remove the table "Acreage of Significant Natural Areas and Total Park Acreage" from the revised notice in favor of including Table 5.

Draft EIR

Chapter III. Project Description

Table 5
Summary of Natural Areas Management Plan

Natural Area Site	Park Acreage	Natural Area Acreage	Management Area (acres)				Invasive Trees			Trails (feet)				Dog Play Areas (acres)			
			MA-1	MA-2	MA-3	Total MA ¹	Existing	To Remove	To Remain	Existing	To Close/Relocate	To Create	Resulting	Existing	To Remove	To Remain	Monitor ²
Balboa	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	100	14	86	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				
Everson/Digby	1.2	1.2	0.9	0.1	0.2	1.2	0	0	0	0	0	0	0				
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	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	
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				
San Francisco Subtotal	2,312.9	869.5	159.0	305.1	401.5	865.6	63,433	3,448	59,985	196,562	53,758	4,105	146,909	95.2	19.3	75.9	
Sharp Park (Pacific)	411.0	237.2	35.0	125.1	76.5	236.6	54,000	15,000	39,000	14,741	653	1,792	15,890				
Total	2,723.9	1,106.7	194.0	430.2	478.0	1,102.2	117,433	18,448	98,985	211,303	54,411	5,897	162,789	95.2	19.3	75.9	

¹The 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.

²The 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.

³Glen Canyon Park and O'Shaughnessy Hollow are two different Natural Areas; they are grouped together in this table, as they are in the SNRAMP.

SFFA-2

Lynch, Laura

From: eric <emiller1@gmail.com>
Sent: Friday, May 18, 2012 7:05 AM
To: Wycko, Bill; Range, Jessica
Subject: Response requested for City's position on state and federal law and city ordinances (other than CEQA)

Dear Mr. Wycko,

Thank you again for your prompt response, which our group has now reviewed. We appreciate your sending information about the steps the City has undertaken to attempt compliance with CEQA's notice-and-comment procedures; however, we continue to believe that the City's actions to date have been inadequate.

In that regard, we would appreciate receiving a further response to our letter addressing the deficiencies we identified under California law other than CEQA, including due process requirements under state and federal law, as well as the San Francisco Forestry Ordinance and the Planning Department's neighborhood notification requirements. Specifically, we would like to understand the City's position that posting in and near the affected parks (rather than at McLaren Lodge, where most park users may not visit) and mailing notice to adjacent and other nearby property owners is not required for this project.

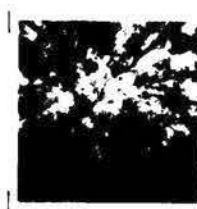
Since these issues were part of our original letter, and especially in light of the fact that the current DEIR notice period expires so soon, we respectfully request that you respond today.

We greatly appreciate your responsiveness in this matter.

Thank you,

Eric Miller
President
San Francisco Forest Alliance

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San Francisco Forest Alliance

Preserving Public Parks for the Public

June 2, 2012

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Bill Wycko, Environmental Officer
Planning Department
City/County of San Francisco
San Francisco, CA 94103

RE: File No. 2005.0912E Draft Environmental Impact Report for Significant Natural Resources Area Management Plan

Dear Mr. Wycko:

Enclosed you will find the public comment of the San Francisco Forest Alliance on the Draft Environmental Impact Report for the Significant Natural Resources Area Management Plan (SNRAMP). Our comment is organized into the following topics:

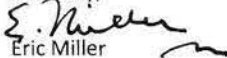
- Part I: Environmental impact of destroying trees
- Part II: Environmental impact of herbicide use
- Part III: Impact of SNRAMP on wildlife
- Part IV: Impact of SNRAMP on recreational access
- Part V: Support for the Maintenance Alternative which is the environmentally superior alternative
- Part VI: Flaws in the public comment process
- Part VII: Debunking the myth of flammability of non-native plants and trees

Our comment is written within the context of the legal requirements of CEQA with regard to Environmental Impact Reports. However, for the record we wish to state our long-term goals for the Natural Areas Program:

- Mature park trees must not be destroyed in attempts to create native plant gardens. Non-native forests are a vital resource and must be protected, maintained and, restored.
- Herbicide use in our public parks for the sole purpose of eradicating non-native species of plants is not justified. The public's health and safety should be San Francisco's highest priority.
- The wholesale destruction of existing habitat is harmful to wildlife. There is no scientific evidence to support the claim that native plants provide superior habitat to that which exists in San Francisco.
- Restrictions on recreational access in urban parks cannot be justified by the creation of native plant gardens, which have not been sustainable on a small scale since the inception of the Natural Areas Program.
- The use of taxpayers' money for the sole purpose of eradicating non-native plants and trees is not justified at a time of extreme budgetary limitations.

Thank you for this opportunity to comment on the Draft Environmental Impact Report for the Significant Natural Resources Area Management Plan.

Sincerely,


Eric Miller
President

SFFA-3

**Public Comment of the San Francisco Forest Alliance
Draft Environmental Impact Report for Natural Resource Areas Management Plan
Part I: Environmental Impact of Destroying Trees**

The Significant Natural Resource Areas Management Plan (SNRAMP) which is evaluated by the Draft Environmental Impact Report (DEIR) documents plans to destroy thousands of trees in the parks managed by the City of San Francisco in San Francisco and Pacifica. This planned tree destruction will release significant amounts of carbon dioxide into the atmosphere. The DEIR reaches the conclusion that the removal of these trees will have no impact on the environment and will not violate California State law regarding greenhouse gas emissions (AB32). This conclusion is based on these fictional premises:

1. That all the trees that are removed will be replaced within the natural areas by an equal number of trees that are native to San Francisco.
2. That only dead, dying, hazardous, or unhealthy trees will be removed.
3. That trees are being destroyed because they are non-native and invasive.
4. That tree removals will not alter wind conditions, causing the trees that remain to fail.
5. That tree removals will not cause erosion or increased run-off and sedimentation
6. That these tree removals will not result in reduced air quality or the loss of carbon stored in the urban forest

This comment will document that these are fictional premises. They are:

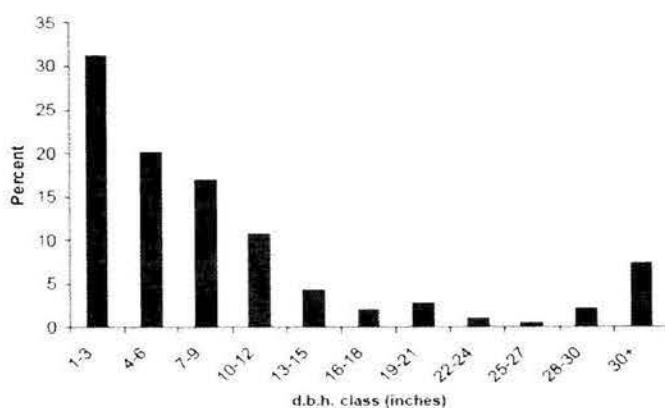
- Contradicted by the horticultural requirements of trees native to San Francisco
- Contradicted by the actual plans as documented by SNRAMP and the "Assessment of Urban Forestry Operations"
- Contradicted by the actual health status of the existing forest
- Contradicted by the actual past practices of the Natural Areas Program with respect to tree removals
- Contradicted by scientific studies and actual experience with tree removals and non-native trees
- Contradicted by the science of the terrestrial carbon cycle

1. Trees destroyed by implementation of SNRAMP cannot/will not be replaced

The DEIR claims that all trees removed in San Francisco will be replaced "one-to-one" by trees that are native to San Francisco. The SNRAMP supports this fictional premise by falsely reducing the number of trees that will be removed:

- By not counting trees less than 15 feet tall which it intends to destroy, despite the fact that the US Forest Service survey of San Francisco's urban forest reports that the trunks of most (51.4%) trees in San Francisco are less than 6 inches in diameter at breast height, the functional equivalent of trees less than 15 feet tall. (Nowak 2007)
- By not counting the hundreds of healthy trees that have already been destroyed by the Natural Areas Program in "natural areas" at Tank Hill, Pine Lake, Lake Merced, Bayview Hill, Glen Canyon parks, etc., prior to the approval of SNRAMP. (see pages 5-8 for details)

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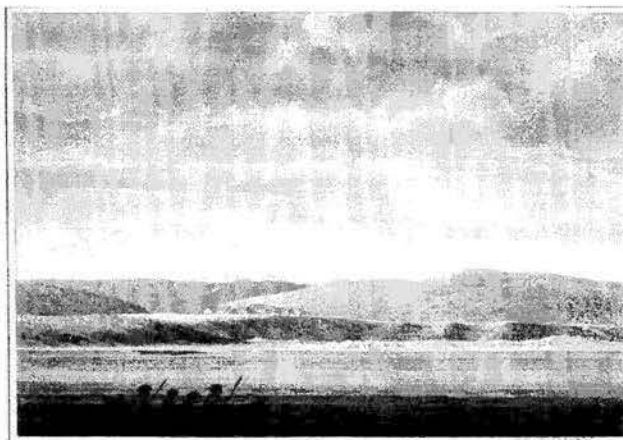
Size of trees in San Francisco's Urban Forest, US Forest Service Survey

However, even artificially reducing the number of trees removed by the implementation of SNRAMP does not make "one-to-one" replacement a realistic goal.

The natural history of trees in San Francisco

The primary reason why we know that it will not be possible to grow native trees in the natural areas in San Francisco is that there were few native trees in San Francisco before non-native trees were planted by European settlers in the late 19th century. San Francisco's "Urban Forest Plan" which was officially adopted by the Urban Forestry Council in 2006 and approved by the Board of Supervisors, describes the origins of San Francisco's urban forest as follows:

"No forest existed prior to the European settlement of the city and the photographs and written records from that time illustrate a lack of trees...Towards the Pacific Ocean, one saw vast dunes of sand, moving under the constant wind. While there were oaks and willows along creeks, San Francisco's urban forest had little or nothing in the way of native tree resources. The City's urban forest arose from a brief but intense period of afforestation, which created forests on sand without tree cover."



San Francisco in 1806 as depicted by artist with von Langsdorff expedition

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The horticultural reality of trees native to San Francisco

More importantly, the reality is that even if we want to plant more native trees in San Francisco, they will not grow in most places in San Francisco because they do not tolerate San Francisco's climate and growing conditions: wind, fog, and sandy or rocky soil, etc. We know that for several reasons:

- There are few native trees in San Francisco now. According to the US Forest Service survey of San Francisco's urban forest only two species of tree native to San Francisco were found in sufficient numbers to be counted in the 194 plots they surveyed: Coast live oak was reported as .1% (one-tenth of one percent) and California bay laurel 2.1% of the total tree population of 669,000 trees. (Nowak 2007)
- The City of San Francisco maintains an official list of recommended species of trees for use by the Friends of the Urban Forest and the Department of Public Works. (CCSF Resolution No. 003-11-UFC)
 - The most recent list (2011) categorizes 27 species of trees as "Species that perform well in many locations in San Francisco." There is not a single native tree in that category.
 - Thirty-six tree species are categorized as "Species that perform well in certain locations with special considerations as noted." Only one of these 36 species is native to San Francisco, the Coast live oak and its "special considerations" are described as "uneven performer, prefers heat, wind protection, good drainage."
 - The third category is "Species that need further evaluation." Only one (Holly leaf cherry) of the 22 species in that category is native to San Francisco.
- Finally, about 25 native trees were planted on Tank Hill to placate neighbors who objected to the removal of the trees by the Natural Areas Program (NAP). About 10 years later only 5 have survived and only one shows any growth.



One of five oak trees that survive 10 years after 25 trees were planted on Tank Hill.
This is the sapling in the best shape.

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SNRAMP documents that there is no intention to plant "replacement" trees

In fact, the SNRAMP documents that the Natural Areas Program (NAP) does not intend to plant replacement trees for the thousands of trees it proposes to destroy.

- The majority of trees over 15 feet tall designated for removal by SNRAMP (15,000 trees) are in Sharp Park. The DEIR acknowledges that these trees will not be replaced because this area will be converted to native coastal scrub.
- The DEIR makes no commitment to replace the trees less than 15 feet tall that will be removed but are not quantified by SNRAMP because they are not defined by SNRAMP as trees. There are probably thousands of trees less than 15 feet tall in the "natural areas" that will be removed and not replaced.
- 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 thousands of native trees in the small areas in which they would be able to survive.
- SNRAMP documents the intention to convert all MA-1 and MA-2 areas, comprising 58% of the total acres of "natural areas" to grassland and scrub: "Within MA-1 and MA-2, these sites [of tree removals] would then be replanted with native shrub and grassland species." (SNRAMP, Forestry Statement, page F-3)
- Only MA-3 areas, comprising 42% of total acreage will continue to support the urban forest: "Within MA-3, urban forest species would be planted or encouraged (see Section 5, GR-15)" (SNRAMP, Forestry Statement, page F-3). However, the Forestry Statement also documents the intention to thin the urban forest in MA-3 areas to a basal area of 60-200 trees per acre (our estimate based on the formula for basal area in SNRAMP). That represents a significant thinning of the urban forest when compared to the tree density of the eucalyptus forest on Mount Sutro documented by UCSF as 740 trees per acre.
- The "Urban Forestry Statements" in Appendix F of the management plan contain the long-term plans for the natural areas in which trees will be destroyed. All but one of these specific plans is some variation of "conversion of some areas of forest to scrub and grasslands." The exception is Corona Heights for which the plans are "converted gradually to oak woodland." The Corona Heights natural area is 2.4 acres, making it physically impossible to plant thousands of oaks in that location.
- "Oak woodland" is the only vegetation goal in SNRAMP which foresees the planting of native trees. Yet, the DEIR says nothing about the potential for Sudden Oak Death (SOD) to decimate the oak population in the San Francisco Bay Area. Ironically, the DEIR acknowledges that one of the comments on the Initial Study raised this question. Yet, despite that question, the DEIR remains silent about the potential for oaks to be killed by SOD. Since the publication of the Initial Study, our local expert (Matteo Garbelotto, UC Berkeley) has reported the rampant spread of SOD and its deadly consequences: "...experts predict as many as 90% of California live oaks and black oaks could die from the disease within 25 years."¹

2. The trees that have been designated for removal are NOT dead, dying, or hazardous

We have many reasons to challenge the truth of the claim in the DEIR that only dead, dying, hazardous or unhealthy trees will be removed by the implementation of SNRAMP:

¹ Fimrite, Peter, "Sudden oak death cases jump, spread in the Bay Areas," San Francisco Chronicle, October 2, 2011

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- SNRAMP documents that young, non-native trees less than 15 feet tall will be removed from the “natural areas.” By definition these young trees are not dead or unhealthy because they are young and actively growing.
- SNRAMP did **not** designate only dead, dying, hazardous trees for removal. Trees have been selected for removal only in so far as they support the goal of expanding and enhancing areas of native plants, especially grasslands and scrub.
- The predominant non-native tree in San Francisco, blue gum eucalyptus lives in Australia from 200-400 years, depending upon the climate. (Jacobs 1955, page 67) In milder climates, such as San Francisco, the blue gum lives toward the longer end of this range. The trees over 15 feet tall that have been designated for removal are almost exclusively blue gum.
- However, there are many natural predators in Australia that were not imported to California. It is possible that the eucalypts will live longer here: “Once established elsewhere, some species of eucalypts are capable of adjusting to a broader range of soil, water, and slope conditions than in Australia...once released from inter-specific competitions and from native insect fauna...” (Doughty 2000, page 6)
- The San Francisco Presidio’s Vegetation Management Plan reports that eucalypts in the Presidio are about 100 years old and they are expected to live much longer: “blue gum eucalyptus can continue to live much longer...” (Vegetation Management Plan, page 28)
- The Hort Science “Assessment of Urban Forestry Operations” for the Recreation and Park Department states that, “the life-span of the blue gum, the most common eucalyptus species, is unknown.” In other words, although they have lived in San Francisco more than 100 years, they have not lived in San Francisco long enough to know how long they will live here.
- The Natural Areas Program has already destroyed hundreds of non-native trees in the past 15 years. We can see with our own eyes that these trees were not unhealthy when they were destroyed.
- The claim that only unhealthy and/or hazardous trees will be destroyed in the natural areas is contradicted by the “Assessment of Urban Forestry Operations” of the Recreation and Park Department, July 2010.
- Neither written plans nor EIRs are required to remove hazardous trees. The City has the right and an obligation to remove hazardous trees when they are identified as such by qualified arborists.

Trees have been designated for destruction solely to benefit native plants

The DEIR claims that only dead, dying, hazardous trees will be removed from the natural areas. This claim is contradicted by the SNRAMP that the DEIR is supposedly evaluating. Not a single explanation in the SNRAMP of why trees have been selected for removal is based on the health of the trees.

- Lake Merced: The explanation for removing 134 trees is “To maintain and enhance native habitats, it is necessary to selectively remove some trees.”
- Mt. Davidson: The explanation for removing 1,600 trees is: “In order to enhance the sensitive species habitat that persists in the urban forest understory and at the forest-grassland ecotone, invasive blue gum eucalyptus trees will be removed in select areas. Coastal scrub and reed grass communities require additional light to reach the forest floor in order to persist “
- Glen Canyon: The explanations for removing 120 trees are: “to help protect and preserve the native grassland” and “to increase light penetration to the forest floor”
- Bayview Hill: The explanation for removing 505 trees is: “In order to enhance the sensitive species habitat that persists in the urban forest understory and at the forest-grassland ecotone, invasive blue gum eucalyptus trees will be removed in select areas.”

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- McLaren: The explanation for removing 805 trees is: "In order to enhance the sensitive species habitat that persists in the urban forest understory and at the forest-scrub-grassland ecotone, invasive trees will be removed in select areas. Coastal scrub and grassland communities require additional light to reach the forest floor in order to persist."
- Interior Greenbelt: The explanation for removing 140 trees is: "In order to enhance the seasonal creek and sensitive species habitat that persists in the urban forest understory, invasive blue gum eucalyptus trees will be removed in select areas."
- Dorothy Erskine: The explanation for removing 14 trees is: "In order to enhance the grassland and wildflower community, removal of some eucalyptus trees is necessary."

In not a single case does the management plan for the Natural Areas Program corroborate the claim made in the DEIR that only dead, dying, diseased, or hazardous trees will be removed. In every case, the explanation for the removal of eucalypts is that their removal will benefit native plants, specifically grassland and scrub. In other words, the explanation provided by the DEIR for tree removals in the natural areas is a misrepresentation of the SNRAMP which it is supposedly evaluating.

The trees that have already been destroyed in the "natural areas" were NOT dead, dying, or diseased.

Although it's interesting and instructive to turn to the written word in SNRAMP for the Natural Areas Program to prove that the DEIR is based on fictional premises, the strongest evidence is the track record of tree removals in the past 15 years. The trees that have been destroyed in the "natural areas" in the past 15 years were NOT dead, dying, or diseased.

Hundreds of trees have been removed in the natural areas since the Natural Areas Program began 15 years ago. We'll visit a few of those areas with photographs of those destroyed trees to prove that healthy, young non-native trees have been destroyed. This track record predicts the future: more healthy young trees will be destroyed in the future for the same reason that healthy young trees were destroyed in the past, i.e., because their mere existence is perceived as being a barrier to the restoration of native grassland and scrub.



Some of the approximately 1,000 girdled trees on Bayview Hill, 2010

- The first tree destruction by the Natural Areas Program and/or its supporters took the form of girdling about 1,000 healthy trees in the natural areas about 10 to 15 years ago. Girdling a tree prevents water

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and nutrients from traveling from the roots of the tree to its canopy. The tree dies slowly over time. The larger the tree, the longer it takes to die. None of these trees were dead when they were girdled. There is no point in girdling a dead tree.



One of about 50 girdled trees on Mt. Davidson, 2003

- Many trees that were more easily cut down without heavy equipment were simply destroyed, sometimes leaving ugly stumps several feet off the ground.



Stumps of small trees destroyed on Bayview Hill, 2002

- About 25 young trees were destroyed on Tank Hill about 10 years ago. We can see from those that remain that the trees—which were planted around the same time—were young. They don't look particularly healthy in the picture because they were severely limbed up to bring more light to the native plant garden for which the neighboring trees were destroyed. All of the trees would have been destroyed if the neighbors had not come to their defense. About 25 oaks were provided to the neighbors by NAP to plant as "replacement" trees. Only 5 are still alive. Only one has grown. The remainder are about 36" tall and their trunks about 1" in diameter, as when they were planted.

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Tank Hill, 2002

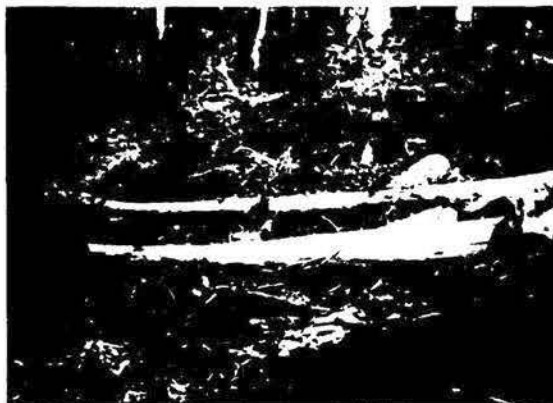
- About 25 young trees were destroyed at the west end of Pine Lake to create a native plant garden that is now a barren, weedy mess surrounded by the stumps of the young trees that were destroyed. These trees were destroyed after all the trees in Stern Grove/Pine Lake had been evaluated by Hort Science. The trees that were cut down to create this new native plant garden had not been judged to be hazardous. They were cut solely for the purpose of expanding the native plant garden.



West end of Pine Lake, July 2011

- About 25 trees of medium size were destroyed at the southern end of Islais Creek in Glen Canyon Park about 6 years ago in order to create a native plant garden. They were replaced with shrubs.
- Many young trees were recently destroyed in the "natural area" called the Interior Greenbelt. These trees were destroyed in connection with the development of a trail, which has recently become the means by which the Natural Areas Program has funded tree removals with capital funding.

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Interior Greenbelt, 2010

- In 2008, the Public Utilities Commission completed a seismic upgrade to the water tank on Mt. Davidson. Because the existing pipe to the tank from the reservoir was “located under sensitive habitat areas” according to the PUC announcement of the project, the pipe was relocated at the insistence of the Natural Areas Program and its supporters. The relocation of the pipe through the non-native forest required the destruction of approximately 100 healthy, mature trees and substantially increased the cost of the project. Only five replacement trees were planted.



100 hundred trees were destroyed on Mt. Davidson to benefit native plants

There was nothing wrong with any of these trees before they were destroyed. Their only crime was that they were not native to San Francisco. There are probably many other trees that were destroyed in the natural areas in the past 15 years. We are reporting only those removals of which we have personal knowledge.

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The claim that only unhealthy and/or hazardous trees will be destroyed in the natural areas is contradicted by the "Assessment of Urban Forestry Operations" of the Recreation and Park Department.

The "Assessment of Urban Forestry Operations"² of the Recreation and Park Department was conducted by the professional arborists of Hort Science and published in July 2010. It states that:

- No risk assessments of trees in parks, squares, and golf courses for health and safety hazards had been conducted in San Francisco with the exception of Stern Grove and Park Presidio Blvd at the time the report was published. The hazards identified in those two assessments had been only partially mitigated by the time the report was published.
- All tree maintenance conducted in San Francisco's parks is reactive, i.e., done in response to specific requests for tree removals or pruning. There was a backlog of "some 450" such requests at the time the report was written.
- The "Assessment" recommends that trees be evaluated in 18 parks considered "high priority." None of these 18 parks are natural areas. In the few parks that contain natural areas, only the "park perimeter streets" will be evaluated.
- There is no reforestation in San Francisco's parks, squares and golf courses outside of Golden Gate Park. The number of trees removed in parks and squares exceeds the number of trees planted. The ratio of removals to plantings is significantly higher in golf courses, particularly Sharp Park.

These observations by certified arborists and written in consultation with the Recreation and Park Department contradicts these claims in the DEIR for the Natural Areas Program:

- **The trees in the natural areas had not been evaluated for health or safety when they were designated for removal by SNRAMP in 2006. Therefore, the DEIR cannot claim that the trees designated for removal in the natural areas are unhealthy and/or hazardous.**
- **There is no reforestation effort outside of Golden Gate Park. Therefore, the DEIR cannot claim that all trees removed in the natural areas will be replaced.**

3. There is no evidence that non-native trees are "invasive"

The DEIR also justifies the destruction of thousands of trees on the grounds that they are non-native and "invasive:"

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. (DEIR, page 456)

In fact, there is no evidence that any of these trees are "invasive." Although, the California Invasive Plant Council has classified eucalyptus as "moderately invasive," there is no scientific evidence to support this claim. According to the US Forest database of plants and trees, "It [Blue gum eucalyptus] does not spread far and rarely invades wildlands."³

² <http://sf-recpark.org/Modules/ShowDocument.aspx?documentid=88>

³ <http://www.fs.fed.us/database/feis/plants/tree/eucglo/all.html>

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William Russell (USGS) and Joe McBride (UC Berkeley) (Russell and McBride 2003) used aerial photos of Bay Area parks taken over a 60 year period from 1939 to 1997, to study changes in vegetation types. They studied photos of 3 parks in the East Bay (Chabot, Tilden, Redwood), 2 parks in the North Bay (Pt Reyes, Bolinas Ridge), and one on the Peninsula (Skyline).

These photos revealed that grasslands are succeeding to shrubland, dominated by native coyote brush and manzanita. (They also noted that this conversion increases fire hazards.) **Eucalyptus and Monterey pine forests actually decreased during the period of study.** In those cases in which forests increased in size, they were native forests of oaks or Douglas fir. In other words, **they found no evidence that non-native trees are invading native trees or shrubs in open spaces in the Bay Area.**

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The California Invasive Plant Council classifies *Acacia dealbata* (Silver wattle) as “moderately invasive” and the impact of *Acacia melanoxylon* (Black acacia) as “limited” and adds “impacts are low in most areas.” In fact, acacia does not spread unless it is cut down when it then resprouts vigorously from the roots unless it is poisoned repeatedly or the roots are dug out of the ground with heavy equipment.

Neither Monterey cypress nor Monterey pine are invasive. Even the California Invasive Plant Council agrees with that assessment. And both are California natives with fossil evidence that they existed on the San Francisco peninsula in the distant past.

On Mt. Davidson, plans to destroy 1,600 trees over 15 feet tall include many Monterey cypresses. In this particular “natural area,” it is therefore not accurate to say that “most” trees that will be removed are invasive. Table 6.2-1 in SNRAMP claims that only .10 acres of Mt. Davidson are forested with Monterey cypress. This is not accurate. Acres of Monterey cypress on Mt. Davidson are much greater. Since these species are also native to California and have existed in San Francisco in the past, it is an exaggeration to call them non-native.

The final EIR must provide scientific evidence that the trees that will be destroyed by SNRAMP are invasive or it must delete this justification for their destruction.

4. Tree removals will change wind patterns, causing tree failures

The DEIR does not evaluate wind impacts of removing thousands of trees in the natural areas because:

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“This section does not address wind impacts in certain Natural Areas because trees targeted for removal are isolated individuals or small groups scattered throughout these Natural Areas, and this removal is not expected to have noticeable wind effects.” (DEIR, page 243)

It is patently false that “trees targeted for removal are isolated individuals or small groups scattered throughout” the natural areas. 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)

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- 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.

Furthermore, destroying a large number of trees slowly, over time substantially increases the cost of such tree removals. Even if it were physically possible to remove them piecemeal, it would not be a responsible use of the limited resources of the Recreation & Park Department which frequently justifies the poor quality of its service and the maintenance of San Francisco’s parks on the grounds that their budget is insufficient.

Even if it were true that only “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.

In their “Assessment of Urban Forestry Operations” for the Recreation and Park Department, Hort Science reminds us of the vulnerability of the trees that remain after their neighbors are gone and they are exposed to more wind than they have developed defenses against: “As individual trees die or fall, it exposes remaining trees to higher wind loads and increases the overall failure rate.” (page 27)

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In December 2011, Hort Science provided us with a specific example of such an occurrence in their "Stern Grove-Pine Lake Park, Parkside Square tree risk assessment." This report was written as an update of Hort Science's comprehensive assessment of all trees in Stern Grove-Pine Lake in 2003, in preparation for finally removing the hundreds of trees that had been evaluated as hazardous 8 years before. Here is what Hort Science found at the "West end of the park, near Wawona and 33rd Ave:"

"This area had a number of trees removed by the Natural Areas Program. Subsequently a large Monterey pine failed at the edge of the newly exposed woodland. Concern was expressed about the exposed nature of the edge and potential for additional failures. This area of Pine Lake Park is exposed to westerly winds. There is still, however, significant tree canopy at street-edge. Pines have been declining for some time. Tree #1057 is posted for removal. Mid-slope is a standing dead pine #347, also recommended for removal."

These trees were cut down in order to expand the native plant garden around Pine Lake. Hort Science had evaluated all trees in Stern Grove/Pine Lake for hazards about one year before these trees were removed. We know those trees were not hazardous, because they had not been judged to be hazardous by the Hort Science evaluation done in 2003.

In other words, as a result of trees removed at the west end of Stern Grove by the Natural Areas Program, a large Monterey pine fell across the path around the lake. Hort Science doesn't mention where the tree fell, but park visitors remember this failure well. It was not a tree that had been previously designated by Hort Science as hazardous. It became hazardous because its wind break was compromised by the removal of trees by the Natural Areas Program.

The removal of 1,600 trees over 15 feet tall on Mt. Davidson will substantially increase windthrow hazards. Although the DEIR denies this risk, the Forestry Statement in SNRAMP acknowledges it:

*"Because of this, removal of edge trees on the northwest side of the park (MA-1c and MA-2c) could increase the rate of windthrow within the stand. **Substantial tree removal in these areas should not occur.** A significant number of mature trees should remain at the park edge to minimize the effects of wind on this stand."* (SNRAMP, Appendix F, page F-11)

Despite this warning that "substantial tree removal...should not occur" in MA-1c and MA-2c areas, just three pages later in Table F-1, SNRAMP reports these tree removals in these areas on Mt. Davidson::

MA	Acres	Existing Trees	Removed	Percent
MA-1c	3.5	1221	1000	82%
MA-2c	1.8	644	200	31%

In other words, SNRAMP predicts tree failures on Mt. Davidson from removal of as many as 82% of all trees on 3.5 acres on the northwest side of Mt. Davidson, yet it plans to remove 1,200 trees from those areas anyway.

The Forestry Statement of SNRAMP also attempts to minimize the danger of windthrow on the grounds that the trees are not near residential neighborhoods: "In general, potential windthrow hazard to people is minimal because there are no residential areas near the stands where the tree removals will occur." (Forestry

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Statement, Appendix F-11). This irresponsible excuse for endangering the public does not acknowledge that there are people visiting these parks and taking their lives in their hands by doing so. The death of a park visitor to Stern Grove in 2008, is apparently insufficient testimony to the way the public is being endangered by these tree removals.

Either the planned tree removals must be decreased to reduce the risk of tree failures caused by windthrow or the final EIR must acknowledge the significant risk of these tree removals.

5. Tree removals will increase run-off, resulting in erosion and landslides

The DEIR concludes that the implementation of SNRAMP will not cause increased sedimentation, reduced water quality, erosion, or increased run-off, for example:

"The potential for erosion would be less than significant through implementation of the GR-12a (revegetate steep slopes) and GR-12b (phased invasive species removal to reduce erosion), erosion control measures and the erosion and sediment control BMPs described in M-HY-1." (DEIR, page 374)

We will examine each of these assumptions in the light of scientific studies and our actual experience with the Natural Areas Program.

Revegetating steep slopes will **not** prevent erosion and increased run-off

The DEIR claims that increased run-off and erosion will be prevented by revegetating areas in which non-native plants and trees are eradicated. **This claim is based on these erroneous assumptions:**

- That native plants will quickly occupy the bare ground on which they are planted.
 - In the 15 years in which the Natural Areas Program has been engaged in its enterprise, it has not successfully vegetated the bare ground created by eradicating non-native plants and trees. Denuded areas are quickly occupied by annual grasses that die back to leave bare ground during the dry season.
- That grassland and dune scrub and non-native trees are equally capable of absorbing run-off and stabilizing soil.
 - **This assumption is contradicted by the following scientific studies:**
 - "Results indicate that **smoothing of precipitation intensities may translate into overall greater stability of hillslopes under forest canopies**. In general, peak intensities of through-fall were damped in intensity and lagged in time relative to peak intensities of rainfall. Damping and lagging of rainfall intensity at both study sites generally increased modeled slope stability relative to openings (areas with no canopy)." (Keim & Skaugset 2003)
 - "The **reinforcement of the main body of a dike by a grove of trees is much higher** and effective in comparison to the reinforcement of the top soil layer by a grass sward. The increase in stability against landslides was found to be at least ten times higher." (Lammeranner & Meixner 2009)

Leaving tree stumps in the ground will **not** prevent erosion.

The DEIR also claims that the removal of trees will not result in erosion because: "...tree removal would be selective, would be implemented gradually over several years, would involve limb-by-limb removals, and would leave tree stumps and root balls intact." (DEIR, page 364) These claims are inconsistent with SNRAMP, incredible, and/or contradicted by scientific studies:

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- As we have already discussed, trees have been selected for removal by SNRAMP in large groups wherever they shade native plants. Some of these groups are as large as 1,000 trees on 3.5 acres (Mt. Davidson). Such removals cannot be accurately described as "selective."
- It is simply not believable that 18,500 large trees will be removed "limb-by-limb." What public entity would ever be in a position to pay for such a laborious removal? How is it even physically possible to remove 15,000 trees in Sharp Park "limb-by-limb?"
- Nor is it believable that 18,500 trees will be taken down piecemeal over a long period of time. This would be both physically difficult and prohibitively expensive.
- **Leaving "tree stumps and root balls intact" does not prevent erosion. There is considerable scientific evidence that erosion results when the roots die:**
 - "The immediate effect of deforestation is, therefore, favorable, but **adverse effects become evident when root systems decay** and when a drop in evapo-transpiration causes a rise in the ground water table." (Brown & Sheu 1975)
 - "Measurement of the decline in tensile strength of small roots in coastal British Columbia after death of the parent tree indicates that **over half the strength is lost within 3 to 5 years after cutting.**" (O'Loughlin 1974)
 - "**Soil strength increased linearly as root biomass increased. Forests clear-felled 3 years earlier contained about one-third of the root biomass of oldgrowth forests.**" (Ziemer 1981)
 - "**Decay of tree roots subsequent to logging was found to cause a reduction in the shear strength of the soil-root system.**" (Wu, McKinnell & Swanston 1979)

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The DEIR's assumption that increased run-off and erosion will not result from the implementation of SNRAMP does not take into account that **the potential for both run-off and erosion are significantly increased by the steepness of slope.** Some of the planned tree removals will occur in very steep terrain:

Natural Area	MA	Tree Removals	% Trees Removed	% Slope*
Interior Greenbelt	MA-2a	100	28%	67%
Mt. Davidson	MA-1c	1,000	82%	40% - 67.5%
	MA-2c	200	31%	33% - 90%
	MA-2e	400	23%	20% - 70%
Bayview Hill	MA-2a	70	32%	55.6%

*Determined by using topographical maps in SNRAMP for each natural area

These are only examples of the steepness of slopes in many of the natural areas. The DEIR should be morally and legally obligated to evaluate the steepness of all of the natural areas in the context of the potential for increased run-off and erosion resulting from the removal of non-native trees.

The potential for increased run-off and erosion is greatly increased by steep slopes. The DEIR has not considered that many of the planned tree removals will occur in very steep locations. Some of these locations are directly uphill of densely populated residential neighborhoods which are in the direct path of both run-off and landslides caused by erosion. Yet, the risks to these residential neighborhoods have not been considered by the DEIR. The residential neighborhoods surrounding Mt. Davidson are particularly vulnerable to increased run-off, erosion and landslides.

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On May 23, 2012, the State of California sued the US Army Corp of Engineers to challenge a national policy "requiring the removal of virtually all trees and shrubs on federal levees."⁴ Donald H. Gray, Professor of Civil and Environmental Engineering at the University of Michigan, explains why California is fighting this federal requirement in this summary of his literature search about the role trees play in stabilizing soil:

"In the long run, cutting of trees on slopes leads to a gradual decrease in mass stability as a result of the decay of roots which previously acted as tensile reinforcements on the slope. Root decay can also lead to the formation of pipes in slopes which promote internal or seepage erosion. The removal of tree canopy results in the loss of interception and evapo-transpiration which tends to promote wetter and less secure slopes. Canopy removal also results in less attenuation in the delivery rate of rainfall to the ground surface."⁵

The City and County of San Francisco should consider the implications of this suit. If the State of California is willing to sue to keep trees on its levees in order to prevent erosion and flooding, what are the prospects that the City and County of San Francisco can successfully defend itself against a legal challenge to its plans to remove 18,500 mature trees from the parks managed by the City of San Francisco?

The City and County of San Francisco is particularly vulnerable to legal challenges from the City of Pacifica regarding its plans for Sharp Park. SNRAMP plans the removal of over 15,000 trees over 15 feet tall in Sharp Park. In many management areas 75% of the trees will be removed. These trees will be replaced by dune scrub. The majority of these trees will be removed from the steep watershed at the eastern end of the park. The park slopes from 750 feet above sea level at its eastern end to sea level at its western end. The golf course, archery course, Laguna Salada, and horse pond are downstream from this steep watershed.

- Tree removals will violate Pacifica's logging ordinance. The DEIR claims that the City of San Francisco is exempt from this law, but provides no explanation for or evidence to support this claim. The final EIR must explain why San Francisco is not subject to Pacifica's laws.
- The final EIR must provide evidence that it is physically possible to remove tens of thousands of trees from a steep watershed without causing sedimentation, erosion, and landslides.
- The final EIR must provide evidence that the endangered species that exist in Sharp Park will not be harmed by increased sedimentation, erosion, and landslides resulting from the removal of 75% of the trees in the watershed.

The final EIR must evaluate the risk of increased run-off, erosion and landslides. It must substantiate its baseless claims that the removal of thousands of trees will not increase this risk, using scientific studies. If the final EIR cannot provide scientific evidence that these tree removals will not increase these risks, it must mitigate these risks by decreasing plans for removal in natural areas where the risks are great because of steepness and/or the proximity of residential properties endangered by the tree removals.

6. The implementation of SNRAMP will result in a significant loss of stored carbon and increased air pollution

⁴<http://cdfgnews.wordpress.com/2012/05/23/dfg-sues-army-corps-to-protect-fish-and-wildlife-around-levees/>

⁵ ftp://136.200.241.91/outgoing/FMO/Veg_on_Levees/Literature%20Reviews/Effects%20of%20Tree%20Removal.pdf

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The urban forest of San Francisco stores 196,000 tons of carbon and adds to that accumulated store of carbon at an annual rate of 5,200 tons per year according to the US Forest Service survey. (Nowak 2007) About 25% of the annual rate of sequestration and the accumulated storage of carbon are accomplished by the blue gum eucalyptus, the chief target for destruction by SNRAMP. When a tree is destroyed, it releases the carbon that it has accumulated throughout its lifetime into the atmosphere as Carbon Dioxide (CO₂) as it decays. Carbon Dioxide is the predominant greenhouse gas that is causing climate change.

Since greenhouse gases are regulated in California by a law that commits the state to reduce greenhouse gas emissions, the Draft Environmental Impact Report (DEIR) for the Natural Areas Program (NAP) goes to great lengths to make the case that destroying thousands of trees will not violate California law. The DEIR's claim that the implementation of SNRAMP will not contribute to greenhouse gas emissions is based on:

- Fabricating facts by misrepresenting scientific studies. The facts are:
 - Grassland in San Francisco does NOT lower ground temperature
 - Grassland does NOT store more carbon than forests
- The DEIR confuses the RATE of carbon sequestration with the total accumulated carbon storage in the plant or tree as it continues to grow. While a young tree may sequester carbon at a faster RATE while it is growing rapidly that does not alter the fact that a mature tree stores more carbon over its lifetime as the carbon accumulates.
- Replacing mature trees with ANY plant or tree will never compensate for the loss of the carbon stored in the trees that will be destroyed.
- Managing the forest by thinning and reforestation does NOT compensate for the loss of carbon stored in mature trees

Grassland in the San Francisco Bay Area does NOT lower ground temperature

The DEIR claims:

*"According to a study presented at the American Geophysical Union's meeting, **grasslands above 50 degrees latitude** reflect more sun than forest canopies, thereby keeping temperatures lower by an average of 0.8 degree Celsius." (DEIR, page 457, cited study⁶)*

This statement in the EIR does not apply to the San Francisco Bay Area and the reference used to support it misrepresents the cited study:

- The entire continental United States, including the San Francisco Bay Area, is below 50 degrees latitude. In other words, this statement—even if it were true—does not apply to the San Francisco Bay Area.

⁶ Jha, Alok. 2006. The Guardian. "Planting Trees to Save Planet is Pointless, Say Ecologists." Friday, December 15, 2006.

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- The statement is taken out of the context of the article. The entire sentence in which this statement appears actually says, "Grassland or **snowfields**, however, reflected more sun, keeping temperatures lower. **Planting trees above 50 degrees latitude, such as in Siberia, could cover tundras normally blanketed in heat-reflecting snow.**" It does not snow in the San Francisco Bay Area. Therefore, this statement does not apply to the San Francisco Bay Area.
- The article being quoted by the DEIR is NOT the scientific study, but rather a journalistic article in The Guardian, a newspaper in England, in which the author of the study has been misquoted and his study misrepresented.
- The day after this article appeared in The Guardian (and also in the New York Times), The Guardian published an op-ed (which also appeared in the New York Times) by the author of the scientific study, Ken Caldeira in which he objected to the misrepresentation of his study:

*"I was aghast to see our study reported under the headline "Planting trees to save planet is pointless, say ecologists." (December 15). Indeed, our study found that **preserving and restoring tropical forests is doubly important**, as they cool the earth both by removing the greenhouse gas carbon dioxide from the atmosphere and by helping produce cooling clouds. We did find that preserving and restoring forests outside the tropics does little or nothing to help slow climate change, but nevertheless **these forests are a critical component of Earth's biosphere and great urgency should be placed on preserving them.**" (Caldeira 2006)*

As if this misrepresentation of the facts weren't bad enough, we find in Appendix A of the DEIR that this isn't the first time that someone has informed the authors of the DEIR that this statement is not accurate. One of the public comments submitted in 2009 in response to the Initial Study quotes Ken Caldeira's op-ed in the New York Times. Yet, two years later, the DEIR persists in repeating this misrepresentation of Professor Caldeira's (Stanford University) research.

Grassland does NOT store more carbon than forests

The DEIR also claims:

"Research studies have concluded that grassland and scrub habitat could act as a significant carbon sink." (DEIR, page 457, cited studies⁷)

⁷Conant, L., Paustian K, and Elliot E. 2001. "Grassland Management and Conversion into Grassland Effects on Soil Carbon." Natural Resource Ecology Laboratory. Colorado State University. Fort Collins, USA. Sponsor: US Environmental Protection Agency, Ruminant Livestock Efficiency Program. 2001, and

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Once again, **the cited study does not support the statement in the EIR:**

- Again, the statement has been taken out of context. The entire sentence reads, "We conclude that grasslands can act as a significant carbon sink **with the implementation of improved management.**" This sentence appears in the abstract for the publication. (Conant 2001)
- One wonders if the authors of the DEIR read the entire article or just the abstract. The point of the study is that land management techniques such as fertilization, irrigation, introduction of earthworms, plowing and fallow methods, etc., can improve the sequestration of carbon in the soil of croplands and pastures. This is obviously irrelevant to the Natural Areas Program, which is not engaged in agriculture or pasturage.
- However, the study is relevant in one regard. It reports that **when forest is converted to grassland, no amount of "management techniques" compensates for the loss of the carbon in the trees that are destroyed:**

*"Though more than half of the rain forest conversion studies (60%) resulted in increased soil Carbon content, **net ecosystem Carbon balance...decreased substantially due to the loss of large amounts of biomass carbon.**"*
(Conant 2001)

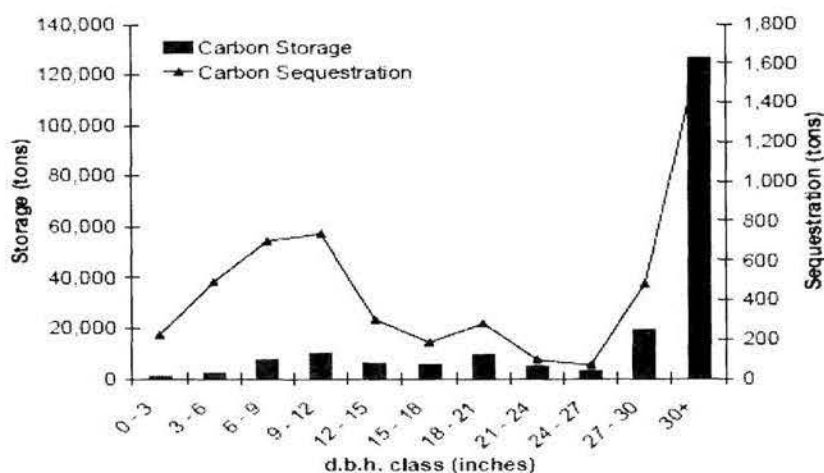
The second study cited in support of the claim about carbon storage in grassland reports that increased levels of Carbon Dioxide **in the air** increases carbon accumulation in the soil. This study tells us nothing about the relative merits of grassland and forests with respect to carbon storage. (Hu 2001) Another study reports a similar relationship between global warming and carbon storage in trees: "...warmer temperatures stimulate the gain of carbon stored in trees as woody tissue, partially offsetting the soil carbon loss to the atmosphere." (Melillo 2011)

The DEIR confuses the RATE of carbon sequestration with the total accumulated storage over the life of the tree

The DEIR claims that because a young tree, growing at a faster rate than a mature tree, sequesters carbon at a faster rate than a mature tree, it follows that replacing mature trees with young trees will result in a net carbon benefit. This is NOT a logical conclusion, as illustrated by this graph from the US Forest Service survey of San Francisco's urban forest (Nowak 2007):

Hu, S., Chapin, Firestone, Field, Chiariello. 2001. "Nitrogen limitation of microbial decomposition in a grassland under elevated CO₂," *Nature* 409: 188-191.

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This graph tells us that although trees sequester carbon faster when they are very small, the large, most mature trees are also sequestering carbon and they store far more carbon than the smaller trees. This is as we would expect, because **the total amount of carbon stored within the plant or tree is proportional to its biomass, both above ground (trunk, foliage, leaf litter, etc.) and below ground (roots).**

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Even IF it were possible replace the non-native trees with native trees—and it's NOT--the native trees would be significantly smaller than the trees that will be destroyed. The few trees that are native to San Francisco are ALL small trees, compared to the trees that will be destroyed. The Natural Areas Program reports that they have planted 8 species of native trees in the "natural areas" since 2008. Of those 8 species, only one (Red Alder) is classified as a tree by the USDA plant database. The other 7 species are classified as "tree/shrub," indicating their small stature and low branching habit. Since the amount of carbon stored within the tree is proportional to its biomass, the native trees would never sequester as much carbon as the trees that will be destroyed by the implementation of SNRAMP.

In its zeal to exonerate SNRAMP from releasing carbon stored in the trees it proposes to destroy, it contradicts itself, i.e., that SNRAMP proposes to destroy all non-native trees less than 15 tall. These are the very same young trees that the DEIR says are capable of sequestering more carbon than mature trees. If, indeed, carbon storage could be preserved by a forest of exclusively young trees—and it CAN'T—what is the point of destroying all the young non-native trees?

The DEIR does not account for the loss of the carbon in the trees that will be destroyed

If we were starting with bare ground, it might be relevant to compare carbon sequestration in various types of vegetation, but we're not. We're talking about a specific project which will require the destruction of thousands of non-native trees. Therefore, we must consider the loss of carbon associated with destroying those trees. **It doesn't matter what is planted after the destruction of those trees, nothing will compensate for that loss because of how the trees will be disposed of.**

The fate of the wood in trees that are destroyed determines how much carbon is released into the atmosphere. For example, if the wood is used to build houses the loss of carbon is less than if the wood is allowed to decompose on the forest floor. And that is exactly what this project proposes to do: chip the wood from the trees and distribute it on the forest floor, also known as "mulching." **As the wood decomposes, the carbon stored in the wood is released into the atmosphere as carbon dioxide:** "Two common tree disposal/utilization scenarios were modeled: 1) mulching and 2)

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landfill. Although no mulch decomposition studies could be found, studies on decomposition of tree roots and twigs reveal that 50% of the carbon is lost within the first 3 years. The remaining carbon is estimated to be lost within 20 years of mulching. Belowground biomass was modeled to decompose at the same rate as mulch regardless of how the aboveground biomass was disposed" (Nowak 2002)

Furthermore, the process of removing trees releases stored carbon into the atmosphere, regardless of the fate of the destroyed trees: "Even in forests harvested for long-term storage wood, more than 50% of the harvested biomass is released to the atmosphere in a short period after harvest." (Anderson 2008)

The DEIR claims to have run a model of carbon loss resulting from the project in Sharp Park: "The model returns the CO₂ emission rates for all equipment deliveries, and worker activity involving on-road and off-road gasoline and diesel fuel use." (DEIR, page 455). The CO₂ emissions resulting from the destruction of 15,000 trees over 15 feet tall in Sharp Park is conspicuously absent from their analysis.

Managing the forest by thinning and reforestation does NOT compensate for the loss of carbon stored in the trees that will be removed.

The DEIR claims that improving the health of the urban forest by thinning and reforestation with young trees—which will NOT be physically possible—will result in a net benefit of carbon storage.

In fact, the more open canopy of an urban forest with less tree density results in greater growth rates. (EPA 2010) Although more rapid growth is associated with greater rates of carbon sequestration, rates of storage have little effect on the net carbon storage over the life of the tree. (Nowak 1993) **Net carbon storage over the life of the tree is determined by how long the species lives and how big the tree is at maturity. These characteristics are inherent in the species of tree and are little influenced by forest management practices such as thinning.** (Nowak 1993)

More importantly, even if there were some small increase in carbon storage of individual trees associated with thinning, this increase would be swamped by the loss of the carbon in the trees that will be destroyed.

The destruction of thousands of trees will increase air pollution

According to the US Forest Service survey of San Francisco's urban forest, "It is estimated that trees and shrubs [of San Francisco] remove 260 tons of air pollution (CO, NO₂, O₃, PM₁₀, SO₂) per year with an associated value of \$1.3 million (based on estimated national median externality costs associated with pollutants). **Trees remove about 19 percent more air pollution than shrubs in San Francisco.**" (emphasis added)

The DEIR provides us with no information about the increase in air pollution which will result from removing thousands of trees over 15 feet tall, untold numbers of trees less than 15 feet tall, thinning the remaining urban forest in the natural areas from approximately 740 trees per acre to less than 200 trees per acre and replacing all those trees with grassland and shrubs which are significantly less capable of reducing air pollution.

Conclusion

The final EIR must correct the following errors of FACT in the DEIR:

- The final EIR cannot claim that all non-native trees that will be destroyed will be replaced with an equal number of native trees because that is neither consistent with the SNRAMP, nor is it physically possible.

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- The final EIR cannot claim that all non-native trees that will be destroyed are dead, dying, diseased, or hazardous because they are NOT and the claim contradicts the SNRAMP.
 - The final EIR must evaluate the risk of failure of the trees that remain after removal of thousands of trees
 - The final EIR must evaluate the risk of increased run-off, erosion and landslides
 - The citations used to make bogus claims regarding carbon sequestration must be removed because they are not relevant and they have been misrepresented by the DEIR.
 - The DEIR's presentation of the terrestrial carbon cycle must be corrected because it is inaccurate:
 - RATES of carbon sequestration must not be confused with the total accumulated stored carbon in mature trees.
 - The final EIR cannot claim that there will be a net carbon benefit of the proposed tree destruction because that claim is inconsistent with the science of the terrestrial carbon cycle
- The DEIR has not quantified the carbon stored in the current landscape; has not quantified the carbon released by the planned tree destruction; has not quantified the carbon stored in the resulting grassland and scrub. The claimed "qualitative analysis" does not tell us how much carbon will be released into the atmosphere by the implementation of SNRAMP.**
- As required by CEQA and California Law AB 32, the final EIR must quantify the loss of carbon resulting from the destruction of thousands of healthy trees, compare that loss to the resulting vegetation (grassland and scrub) and mitigate for the net loss of carbon that is the inevitable outcome of the implementation of SNRAMP.**

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**Public Comment of the San Francisco Forest Alliance
Draft Environmental Impact Report for the Natural Resource Areas Management Plan
Part II: Herbicides required to implement SNRAMP**

The Draft Environmental Impact Report (DEIR) for the Significant Natural Resource Areas Management Plan (SNRAMP) claims that the herbicides required to implement SNRAMP will not have a significant impact on the environment. It reaches that conclusion by providing inadequate and inaccurate information about the use of herbicides by the Natural Areas Program (NAP) in the present and by providing no information about the requirements for more herbicides in the future to kill the roots of thousands of trees that will be destroyed. In this public comment we will document these issues as follows:

1. The DEIR provides no information about the frequency of use of herbicides by the Natural Areas Program
2. The DEIR provides no information about imazapyr which is currently the herbicide the Natural Areas Program uses most frequently
3. The DEIR claims that herbicide applications by the Natural Areas Program comply with San Francisco's Integrated Pest Management (IPM) Ordinance. In fact, the public record contains considerable evidence that herbicide applications by the Natural Areas Program frequently violate San Francisco's IPM Ordinance.
4. The DEIR misstates the facts about the toxicity of the herbicides being used by the Natural Areas Program
5. The use of herbicides on Twin Peaks that are known to be harmful to butterflies violates the Endangered Species Act
6. The DEIR provides no information about the increased use of herbicides that will be required to prevent the resprouting of the trees that will be destroyed by the implementation of SNRAMP.

1. Herbicide use by the Natural Areas Program

The Draft Environmental Impact Report (DEIR) provides no information about the volume of herbicides used by the Natural Areas Program (NAP). The sole sentence in the DEIR pertaining to volume of use of herbicides is this:

"In 2004, the Natural Areas Program accounted for less than 10 percent of the overall SFRPD pesticide use, even though the Natural Areas account for approximately 25% of the land managed by the SFRPD." (DEIR, page 365)

This statement provides inadequate information regarding NAP's pesticide use because:

- It is eight years out of date.
- Since we aren't informed by the DEIR of the volume of SFRPD's pesticide use, we are unable to determine the volume of NAP's pesticide use, i.e., NAP's pesticide use is 10% of WHAT?
- We aren't reassured by the claim that NAP's pesticide use is only 10% of total RRPD pesticide use—if in fact that is true. The public has good reason to expect that parks designated as "natural areas" should contain less pesticide than other park areas, such as golf courses, lawns, flower gardens, and landscaped areas.

Based on public records requests, we have the following information about the number of pesticide applications by the Natural Areas Program (See Attachment II-A):

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Number of pesticide applications by the Natural Areas Program

Active Ingredient	2008	2009	2010	2011	Percent Increase
Triclopyr (Garlon)	17	16	36	3	
Glyphosate (Roundup)	7	6	31	39	
Imazapyr (Habitat)	1	1	1	39	
Aminopyralid (Milestone)	1	1	1	4	
Total	26	24	69	86	330%

We learn from these official reports of NAP's pesticide use which are required by the City's IPM Ordinance, that NAP's pesticide use has increased 330% since 2008. Therefore, the only information provided by the DEIR regarding NAP's pesticide use is inadequate and inaccurate because it is eight years old and pesticide use by the Natural Areas Program is increasing significantly from year to year, 330% in the past four years alone.

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We also learn from these official reports of NAP's pesticide use that several other statements in the DEIR are inaccurate:

- The DEIR claims that *"Garlon is being phased out from use in Natural Areas and is only used for invasive plants in biologically diverse grasslands due to its target specificity."* (DEIR, page 365)

According to the official reports of NAP's pesticide use, Garlon (active ingredient triclopyr) was used more often than any other pesticide until 2011. While use of Garlon decreased in 2011, it is still being used according to Pesticide Application Notices posted in the natural areas in 2012.

- The statement that Garlon is *"only used for invasive plants in...grasslands"* is contradicted by this statement in the DEIR:

"Treatment of tree stumps with San Francisco-approved pesticides (such as Roundup and Garlon)" (DEIR, page 386)

- The DEIR claims that glyphosate is the *"primary product used."* (DEIR, page 365). This statement is inaccurate. Official reports of NAP's pesticide use prove that triclopyr was used more often than glyphosate until 2011 when imazapyr was used as frequently as glyphosate.

2. The DEIR provides no information about imazapyr which is currently the most frequently used herbicide

For the most part NAP substituted a mixture of glyphosate and imazapyr for Garlon in 2011. Is this an improvement? Maybe not. Although glyphosate and imazapyr are assigned a lower hazard rating of "More Hazardous" by the Department of the Environment, the Natural Areas Program increased their pesticide applications in 2011 at least 20% compared to 2010. But more importantly, little is known about the toxicity of imazapyr and nothing is known about the toxicity of combining glyphosate and imazapyr.¹ Imazapyr was approved for use in California in 2005, so only the minimal tests required by law have been done on it.

The Natural Areas Program is using imazapyr for a purpose different from that for which imazapyr was evaluated.

The "Aquatic Pesticide Application Plan for the San Francisco Estuary Invasive Spartina Project"¹ is cited by San Francisco's IPM program as the evaluation upon which it based its decision to add imazapyr to the list of pesticides

¹ http://www.spartina.org/project_documents/2010_APAP_FINAL_ALL.pdf

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approved for use in San Francisco in 2010. Was it appropriate for the city's IPM program to use the evaluation of imazapyr for the Spartina project as the basis of their decision to approve its use by the Natural Areas Program? We don't think so. The circumstances of the Spartina project are substantially different from those of its use by the Natural Areas Program.

Imazapyr is used to eradicate non-native Spartina in a tidal estuary. For that reason the evaluation of its use assured the public that this herbicide would not accumulate in the environment because it would be flushed away from the ground by the tide twice each day.

The evaluation also said that when imazapyr was used in a pond or stable water source, it persisted in the ground for a longer period of time. In fact, that's exactly how imazapyr is being used by the Natural Areas Program. It has been used at Lake Merced and at Pine Lake, both stable water sources. It is also being used in Glen Canyon Park, which is a watershed.

We don't assume that imazapyr is being used safely to eradicate Spartina. However, even if it is, it does NOT follow that it is safe for use in watersheds that are not tidal, such as those being sprayed by the Natural Areas Program.

The Natural Areas Program is combining imazapyr and glyphosate which is both inappropriate and unnecessary

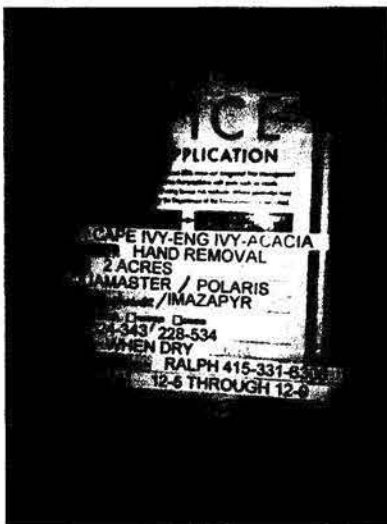
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The manufacturer's labels for imazapyr and glyphosate suggest that combining them is not an approved use. The manufacturer's label for Aquamaster (glyphosate) does not include imazapyr on the list of pesticides with which it can be safely combined. And the Polaris (imazapyr) label says that it should not be combined with another pesticide unless it is expressly recommended by the manufacturer of that pesticide.

The evaluation of imazapyr for the Spartina eradication project explained why imazapyr is being combined with glyphosate by the non-native Spartina eradication project. Imazapyr is apparently slow acting. It can take some months to kill the plant on which it is sprayed. Glyphosate, on the other hand, is fast acting. The plant on which it is sprayed begins to yellow and die within a few weeks. Glyphosate is therefore used by the Spartina eradication project to provide quicker feedback to those spraying the herbicide. They know within a few weeks if they have sprayed in the right place. They don't have to wait for the next season to spray again if necessary.

However, glyphosate should be applied to perennial broadleaf plants during their reproductive stage of growth, when they are budding in the late spring and summer, according to the manufacturer. In Glen Canyon Park, a mixture of glyphosate and imazapyr was sprayed on ivy in December 2011, clearly not the recommended time period for spraying. A month later, there was no indication that the ivy was damaged by this spraying. This suggests that it was unnecessary to combine glyphosate and imazapyr in this application. The public was exposed to the unnecessary risk of combining these herbicides, with no potential benefit of taking that risk.

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The Natural Areas Program is spraying imazapyr under trees which is likely to kill the trees

Glyphosate is a non-selective herbicide. That is, it kills any plant it is sprayed on at the right stage of its growth. But imazapyr is far more insidious as a killer of plants because it is known to travel from the roots of the plant that has been sprayed to the roots of other plants. For that reason, the manufacturer cautions the user NOT to spray near the roots of any plant you don't want to kill. For example, the manufacturer says explicitly that **imazapyr should not be sprayed under trees, because that tree is likely to be killed, whether or not that was the intention.**



Pesticide Application Notice under trees, Glen Canyon, December 2011

Much of the ivy that was sprayed by the Natural Areas Program in Glen Park in December 2011 was sprayed under willow trees. The willow trees are native, so it seems unlikely that they intended to kill them.

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Plants that are repeatedly sprayed with imazapyr are likely to develop a resistance to that herbicide.

The Federal Drug Administration recently banned some use of antibiotics in domesticated animals because the bacteria antibiotics are intended to kill are developing resistance to the antibiotics. This resistance is becoming increasingly dangerous to humans who are also the victims of those bacteria. Antibiotics are being rendered useless by overuse on domesticated animals. When humans need them, they won't work because bacteria have developed a resistance to them.

Likewise, plants and animals are also capable of developing resistance to pesticides. Glyphosate is the most heavily used herbicide in agriculture. Recent research indicates that weeds are developing resistance to glyphosate."

The manufacturer of imazapyr says explicitly that repeated use of this herbicide is likely to result in resistance to it over the long term: "When herbicides with the same mode of action are used repeatedly over several years to control the same weed species in the same application site, naturally occurring resistant weed biotypes may survive...propagate and become dominant in that site." So, does it make sense to use imazapyr on a plant as persistent as ivy?

The GGNRA reported spending \$600,000 over 3 years trying to eradicate ivy from 127 sites. They were successful in only 7 of the sites.ⁱⁱⁱ Obviously eradicating ivy is not a one-shot deal.

If it is indeed necessary to eradicate ivy—and we doubt that it is--pesticides do not have to be used to do it. The Audubon Canyon Ranch in Bolinas Lagoon reported "qualified" success using hand-pulling methods on 5 acres over 5 years "utilizing 2375 volunteer hours." Biannual monitoring of resprouts will be required for the foreseeable future. It's a big commitment, but at least it is safe.

To conclude this section, we do not believe that imazapyr should be used in non-tidal watersheds. Nor do we believe it should be combined with glyphosate. In any case, the manner in which it has been used by the Natural Areas Program is not consistent with the manufacturer's recommendations regarding its use.

3. Pesticide use by the Natural Areas Program frequently violates San Francisco's IPM Ordinance

In lieu of providing any information about the actual use of pesticides by the Natural Areas Program, the DEIR claims that the mere fact that these pesticide applications comply with San Francisco's IPM Ordinance ensures that there will be no significant impact on the environment from its pesticide use:

"Pesticide use...would adhere to the IPM Program. As a result, water quality impacts from herbicide and pesticide use as part of programmatic projects would be less than significant." (DEIR, page 365)

There are two problems with this claim:

- NAP has been granted exceptions to the IPM Ordinance to use toxic chemicals that are not used by other agencies in San Francisco: imazapyr and triclopyr.
 - Garlon (triclopyr): Tier I, Most Hazardous. Use Limitation: "Use only for targeted treatments of high profile or highly invasive exotics via dabbing or injections. May use for targeted spraying only when dabbing or injections are not feasible and only with use of a respirator. HIGH PRIORITY TO FIND ALTERNATIVE." (San Francisco IPM policy 2011)

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- Habitat (imazapyr): Tier II, More Hazardous. Use Limitation: "Preferred alternative to triclopyr for use on invasive weeds in natural areas such as broom, cotoneaster, or Arundo grass." (San Francisco IPM policy 2011)
- Even after having been granted these exceptions, NAP has frequently violated the IPM Ordinance. Many of these violations have been reported to the Department of the Environment by the public and are therefore a part of the public record:
 - NAP's report of pesticide use is frequently incomplete: targets for applications, locations of applications, etc., are frequently missing from NAP's reports. (See Attachment II-A)
 - We have photographs of notices of pesticide applications for which there are no corresponding entries on the official record of pesticide use maintained by the Department of the Environment. This suggests that the official reports of NAP's pesticide use are not complete. These photographs have been sent to the Department of the Environment.
 - NAP's notices of pesticide application are frequently missing the date of application, thereby making it impossible for the public to know when the area is safe to enter. Photographs of these incomplete notices have been sent to the Department of the Environment.
 - NAP used imazapyr in 2008 and 2009, prior to its approval for use by San Francisco's IPM policy in 2011.
 - NAP **sprayed** Garlon (triclopyr) prior to 2011 when only "dabbing and injection" were approved application methods by the IPM policy.
 - NAP sprayed Garlon (triclopyr) in 2011 without using a respirator, as required by the IPM Ordinance in 2011. (see Attachment II-B)
 - NAP sprayed herbicides containing glyphosate in the water of Lake Merced which is officially designated red-legged frog habitat in violation of US Fish and Wildlife regulations which ban the use of many herbicides, including glyphosate, from designated habitat for red-legged frogs and other endangered amphibians.
 - Volunteers working in the natural areas are not authorized to use herbicides because they have not been trained and do not have the proper equipment with which to safely apply herbicides. Some of these unauthorized volunteers have been seen spraying herbicides without posting the required notification of pesticide application. These incidents have been reported to the Department of the Environment.

4. The DEIR makes inaccurate statements regarding the toxicity of the pesticides used by the Natural Areas Program

The DEIR contains little information regarding the toxicity of the pesticides being used by the Natural Areas Program. What little information it provides is entirely inaccurate:

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"[Garlon] degrades quickly in the environment and has low toxicity to aquatic species (Dow2009)." (DEIR, page 365)

The following are the accurate statements regarding biodegradability and toxicity to aquatic life quoted directly from the Material Safety Data Sheet which is mandated by the federal government and prepared by the manufacturer of the product (Dow) based on laboratory studies conducted by the Environmental Protection Agency which are also mandated by federal law (see Attachment II- C):

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"Persistence and Degradability"

*Chemical degradation (hydrolysis) is expected in the environment. **Material is expected to biodegrade only very slowly (in the environment). Fails to pass OECD/EEC tests for ready biodegradability.***"
(emphasis added)

"Ecotoxicity"

Material is highly toxic to aquatic organisms on an acute basis..." (emphasis added)

This flagrant misrepresentation of the toxicity of Garlon is appalling. The DEIR contains no accurate information about the toxicity of any of the pesticides used by the Natural Areas Program. In the only case in which it provides any information, it resorts to egregious lies.

5. The use of herbicides known to be harmful to butterflies on Twin Peaks violates the Endangered Species Act

The Mission Blue butterfly is a federal endangered species which existed historically on Twin Peaks in San Francisco. San Francisco's Natural Areas Program has been trying to reintroduce the Mission Blue to Twin Peaks for several years, so far with limited success. This reintroduction effort is reported by the DEIR.

Herbicides are being sprayed on Twin Peaks to control non-native vegetation. **Twin Peaks was sprayed with herbicides 16 times in 2010 and 19 times in 2011.**

A recently published study reports¹⁰ that the reproductive success of the Behr's metalmark butterfly was significantly reduced (24-36%) by herbicides used to control non-native vegetation. Two of those pesticides are used on Twin Peaks, imazapyr and triclopyr. Triclopyr was used most often on Twin Peaks in 2010 and imazapyr in 2011.

The study does not explain how this harm occurs. It observes that the three herbicides that were studied work in different ways. It therefore speculates that the harm to the butterfly larva may be from the inactive ingredients of the pesticides which they have in common, or that the harm comes to the larva from the plant which is altered in some way by the herbicide application. Either theory is potentially applicable to the herbicides used on Twin Peaks and consequently harmful to the Mission Blue.

The Endangered Species Act requires that the Natural Areas Program stop spraying these herbicides on Twin Peaks because they are known to be harmful to the reproductive success of butterflies. Unless further scientific study exonerates these herbicides, the law obligates us to prohibit their use where the endangered Mission Blue butterfly is known to exist.

6. The DEIR provides no information about the increased use of pesticides that will be required to implement the SNRAMP

The DEIR's claim that NAP's herbicide use will have no significant impact on the environment is apparently based on historic data from 2004 (which it does not share with the reader) and an assumption that historic use was in compliance with San Francisco's IPM Ordinance. As we have shown, data from 2004 does not describe NAP's present use, NAP is granted exceptions for most of its pesticide use, and NAP has a substantial public record of violating IPM policy.

However, the DEIR is supposed to evaluate the environmental impacts of implementing the SNRAMP. It is therefore obligated to look forward, not backward. The DEIR tells us nothing about NAP's use of herbicides in the future as a result of the implementation of the SNRAMP.

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This is the most significant failing of the DEIR because destroying thousands of trees will require the use of more pesticides. Most of the non-native trees that will be destroyed will resprout if their trunks are not sprayed immediately with Garlon. This initial application of Garlon is often insufficient to kill the roots of the tree. Repeated applications are often required to kill the roots of the tree.

The DEIR acknowledges the need to use Garlon on the stumps of trees that have been destroyed: *"Treatment of tree stumps with San Francisco-approved pesticides (such as Roundup and Garlon)"* (DEIR, page 386)

However, the DEIR provides no information about how much more pesticide must be used as a result of destroying thousands of non-native trees. We turn to the University of California at Berkeley for this information. UC Berkeley has been clear-cutting all non-native trees from its properties for over 10 years. Several years ago it applied for grant funding from the Federal Emergency Management Agency (FEMA) to continue its eradication of all non-native trees from its property. It submitted the attached letter with its application to FEMA (obtained with a FOIA request) to document the cost of poisoning all of the stumps of the trees with Garlon. UC predicts Garlon must be applied to resprouts twice per year for 10 years. (See II- D) Both UC Berkeley and East Bay Regional Park District are on record in their "vegetation management plans" that Roundup is not capable of preventing the resprouts of trees. Garlon is the only pesticide known to be effective for this purpose. The Material Safety Data Sheet documents that Garlon is a "Hazardous Chemical" which is very toxic to aquatic life, slightly toxic to birds, and biodegrades slowly in the environment. (See Attachment II- D)

Conclusion

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The final Environmental Impact Report for the SNRAMP must:

- Provide specific and current data about pesticide use by the Natural Areas Program
- Provide accurate information about the toxicity of the pesticides being used by the Natural Areas Program
- Quantify, evaluate and mitigate the increased pesticide use that will be required as a result of destroying thousands of trees that will resprout unless their stumps are treated with pesticides.

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If this information is provided in the final Environmental Impact Report it is unlikely that the EIR will be in a position to claim that there will be no significant impact on the environment resulting from the implementation of the SNRAMP. The animals that live in our parks and the humans who visit them therefore deserve the mitigation required to ensure their health and safety. Furthermore, CEQA law requires such mitigation.

ⁱ "Aquatic Pesticide Application Plan for the San Francisco Estuary Invasive Spartina Project," August 2010, page 32.

ⁱⁱ http://www.stltoday.com/business/local/article_f01139be-ace0-502b-944a-0c534b70511c.html

ⁱⁱⁱ Liston, Heather, "Reuniting old adversaries can beat back exotic invaders," *California Wild*, Winter 2006

^{iv} John D. Stark, Xue Dong Chen, Catherina S. Johnson, "Effects of herbicides on Behr's metalmark butterfly, a surrogate species for the endangered butterfly, Lange's metalmark," *Elsevier*, 1/11/12.

Attachment II-A

APPLICATION NUMBER	Application/Comments	PESTICIDE	Amount Used	Units/Used	TARGET PEST	EPA Number	HOW APPLIED	APPLICATOR	DATE OF APPLICATION	DATE OF NOTIFICATION	SITE MANAGER	NOTIFIER
GARLON												
17642	Monocot city	GARLON 4	2	fl.ozs.	broadleaf weeds	62719-40-ZB-62719	Spray	DE MEO, LUCIA	16-Jan-08			
17643	Poison Oak / Oxalis	GARLON 4	2	fl.ozs.	broadleaf weeds	62719-40-ZB-62719	Spray	HAYES, DYLAN	16-Jan-08			
17699	pine lake	GARLON 4	1.8	fl.ozs.	cape ivy	62719-40-ZB-62719	Spray	HAYES, DYLAN	14-Feb-08			
17700	bayview hill	GARLON 4	13.2	fl.ozs.	cape ivy	62719-40-ZB-62719	Spray	HAYES, DYLAN	26-Feb-08			
17701	twin peaks	GARLON 4	5.4	fl.ozs.	oxalis	62719-40-ZB-62719	Spray	annese	26-Feb-08			
17761	east grassland	GARLON 4	8	fl.ozs.	oxalis	62719-40-ZB-62719	Spray	ZEBELL, RANDOLPH (RANDY)	6-Mar-08			
17762	twin peaks	GARLON 4	21.6	fl.ozs.	oxalis	62719-40-ZB-62719	Spray	CAMPBELL, CHRISTOPHER	6-Mar-08			
17763	mt. Davidson	GARLON 4	18	fl.ozs.	oxalis	62719-40-ZB-62719	Spray	CAMPBELL, CHRISTOPHER	6-Mar-08			
17764	Glen canyon	GARLON 4	10	fl.ozs.	oxalis	62719-40-ZB-62719	Spray	ZEBELL, RANDOLPH (RANDY)	7-Mar-08			
17765	Mc Laren, Quail run	GARLON 4	10	fl.ozs.	oxalis-burclover	62719-40-ZB-62719	Spray	DE MEO, LUCIA	7-Mar-08			
17883		GARLON 4 ULTRA	2	fl.ozs.	stumps	62719-527	Spray	ANNESE, THOMAS (TOM)	13-Jun-08			
18121		GARLON 4 ULTRA	7.5	fl.ozs.	weeds	62719-527	Spray		1-Oct-08		Lias Wayne	
18122	Mt. Davidson	GARLON 4 ULTRA	10	fl.ozs.	stump treatment	62719-527	Spray		7-Oct-08		Lias Wayne	
18123	Mt. Davidson	GARLON 4 ULTRA	30	fl.ozs.	stump treatment	62719-527	Spray		22-Oct-08		Lias Wayne	
18124	sharp park	GARLON 4 ULTRA	12	fl.ozs.	stump treatment	62719-527	Spray		28-Oct-08		Lias Wayne	
18125	gsp/low	GARLON 4 ULTRA	12	fl.ozs.	stump treatment	62719-527	Spray		30-Oct-08		Lias Wayne	
18160		GARLON 4 ULTRA	14	fl.ozs.	eucalyptus saplings	62719-527	Spray		25-Nov-08	20-Nov-08	Lisa Wayne	
TOTAL GARLON 2008			179.5									
18242	oxalis	GARLON 4 ULTRA	2	fl.ozs.	weeds	62719-527	Spray		30-Jan-09		LISA WAYNE	
18273		GARLON 4 ULTRA	4.8	fl.ozs.	oxalis	62719-527	Spray		4-Feb-09	15-Jan-09	LISA WAYNE	
18274	Brooks park, Orizaba rocks	GARLON 4 ULTRA	4.8	fl.ozs.	oxalis	62719-527	Spray		10-Feb-09	15-Jan-09	LISA WAYNE	
BAYVIEW HILL												
18275		GARLON 4 ULTRA	28.5	fl.ozs.	oxalis	62719-527	Spray		19-Feb-09	15-Jan-09	LISA WAYNE and KIRRA SWENERTON	
18276	Corona	GARLON 4 ULTRA	9.6	fl.ozs.	oxalis	62719-527	Spray		27-Feb-09	15-Jan-09	LISA WAYNE	
18329	twin peaks	GARLON 4 ULTRA	3.6	fl.ozs.	oxalis	62719-527	Spray		5-Mar-09	02-Mar-09	Lisa Wayne	
18330	Glen Canyon	GARLON 4 ULTRA	6	fl.ozs.	poison oak	62719-527	Spray		12-Mar-09	02-Mar-09	Lisa Wayne	
18331	Glen Canyon	GARLON 4 ULTRA	3	fl.ozs.	OXALIS	62719-527	Spray		13-Mar-09	02-Mar-09	Lisa Wayne	
18332	Glen Canyon, above seep	GARLON 4 ULTRA	3	fl.ozs.	OXALIS	62719-527	Spray		19-Mar-09	02-Mar-09	Lisa Wayne	
18333	billygoat hill	GARLON 4 ULTRA	5.5	fl.ozs.	OXALIS/ invasive pea	62719-527	Spray		27-Mar-09	22-Mar-09	Lisa Wayne	
18476		GARLON 4 ULTRA	14.4	fl.ozs.	weeds	62719-527	Spray		2-Jul-09		Lisa Wayne	
18477		GARLON 4 ULTRA	10	fl.ozs.	weeds	62719-527	Spray		14-Jul-09		Lisa Wayne	
18510		GARLON 4 ULTRA	2	fl.ozs.	acacia resprouts	62719-527	DAUBER		18-Aug-09		Lisa Wayne	
18511		GARLON 4 ULTRA	6	fl.ozs.	broadleaf weeds	62719-527	Spray		20-Aug-09		Lisa Wayne	
18583	McLaren	GARLON 4 ULTRA	3	fl.ozs.	fennel	62719-527	Daubber		1-Oct-09		Lisa Wayne	
18584	McLaren	GARLON 4 ULTRA	3	fl.ozs.	fennel	62719-527	Daubber		1-Oct-09		Lisa Wayne	
TOTAL GARLON 2009			109.2									
18667	Mt Davidson	Garlon	2	fl.ozs.	oxalis - grasslands	627-1940	Backpack sprayer	Lisa Wayne	3-Feb-10		10,000 sq ft	
18729	Twin Peaks	Garlon	19	fl.ozs.	oxalis	627-1940	Backpack sprayer	Jan Campos, Kirra Sweneter	18-Mar-10			
18726	Twin Peaks	Garlon 4	10.5	fl.ozs.	N & S peak, scot's garden, top of Mission bowl	62719529	Backpack sprayer	Kirra Sweneter	4-Mar-10			
18727	Twin Peaks	Garlon 4	7.2	fl.ozs.	Mission Ridge & bowl, oxalis	62719529	Backpack sprayer	Kirra Sweneter	17-Mar-10			
18730	Mt Davidson	Garlon 4 Ultra	9	fl.ozs.	Mt Davidson/ Cape Ivy	62719 527	Backpack	Ryan Gerlach	15-Mar-10			
18731	Mt Davidson	Garlon 4 Ultra	3.6	fl.ozs.	oxalis	62719 527	Backpack	Ryan Gerlach	16-Mar-10			

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18732	Twin Peaks	Garlon 4 Ultra	8	fl. ozs.	Algerian ivy	62719-527	Backpack	illeg	17-Mar-10	
18733	Twin Peaks	Garlon 4 Ultra	9	fl. ozs.	oxalis	62719-527	Backpack	illeg	17-Mar-10	
18734	Mt Davidson	Garlon 4 Ultra	3.6	fl. ozs.	oxalis	62719-527	Backpack	illeg	18-Mar-10	
18728	Grandview	Garlon 4 Ultra	3.6	fl. ozs.	oxalis narrow leaf replant	62719-527	Backpack	Kirra Swenertor	19-Mar-10	
18725	McLaren	Garlon 4 Ultra	3.6	fl. ozs.	East of amphitheater/ flat wet meadow	62719-527	Backpack	Christopher Campbell	24-Mar-10	2500 sq ft
	Glen Canyon/ O' Shaughnessy	Garlon 4 Ultra	6.5	fl. ozs.	O'Shaughnessy roadside, delVale to Malta	62719-527	Backpack	Zebell	8-Apr-10	
	Glen Canyon/ Fox meadow, paths, hemlock patch	Garlon 4 Ultra	12.5	fl. ozs.		62719-527	Backpack	DeMeo/ Swenerton	8-Apr-10	
	Glen Canyon/ Fox meadow	Garlon 4 Ultra	5	fl. ozs.	Poison oak, broom, english ivy, hemlock	62719-527	Backpack	DeMeo L	22-Apr-10	
	O'Shaughnessy	Garlon 4 Ultra	3	fl. ozs.	Scabiosa	62719-527	Backpack	Campbell, Chris	22-Apr-10	
	Twin Peaks	Garlon 4 Ultra	3.8	fl. ozs.	Fennel along Burnett	62719-527	(Shelterbelt) Garcia/ Wilson		26-Apr-10	0.5 acres
	Twin Peaks	Garlon 4 Ultra	8	fl. ozs.	Cotoneaster (stump treatment)	62719-527	(Shelterbelt) Garcia/ Wilson		26-Apr-10	0.25 acres
	Oak Woodlands (GGP)	Garlon 4 Ultra	4.5	fl. ozs.	Cotoneaster/mayten/ tree of heaven	62719-527	(Shelterbelt) Garcia/ Wilson		30-Apr-10	0.5 acres
	Twin Peaks	Garlon 4 Ultra		fl. ozs.	Cotoneaster	62719-527	(Shelterbelt) Garcia/ Wilson		30-Apr-10	
	McLaren	Garlon 4 Ultra	8	fl. ozs.	Gazania and fennel - Vis Valley overlook	627-1940	Backpack	K Swenerton	19-May-10	
	McLaren - University Hill	Garlon 4 Ultra	3.6	fl. ozs.	Above asphalt path at University and Woolsey, fennel	62719-0537	Backpack	Licia De Meo	17-Jun-10	
	McLaren - tryphzalla (?) area	Garlon 4 Ultra	15	fl. ozs.	Gazania and fennel between 2 paths and grasslands	62719-0537	sprayer	Lisa Wayne	17-Jun-10	
	McLaren	Garlon 4 Ultra	9	fl. ozs.	Fennel - south of Mansell, east of Visitation	62719-527	Backpack	Ryan Gerlach, Ventura Garcia	23-Jun-10	
	Bayview	Garlon 4 Ultra	24	fl. ozs.	Fennel- grasslands	62719-527	Backpack	Ryan Gerlach, Ventura Garcia	23-Jun-10	
	McLaren	Garlon 4 Ultra	6	fl. ozs.	S of Mansell Forest	627-1940	Dauber stump treatment	K Swenerton	16-Sep-10	
	McLaren (Geneva)	Garlon 4 Ultra	1	fl. ozs.	Geneva Ridge fennel	627-1940	Dauber (cut and daub)	Dylan Hayes	13-Oct-10	
	Twin Peaks	Garlon 4 Ultra + spraytech oil	15	fl. ozs.	Poison Oak, Fennel - PO along path and fennel above Crestline	62719-527	Backpack	Ryan Gerlach, Ventura Garcia, Ben Adamo	29-Jun-10	
	Bayview	Garlon 4 Ultra + spraytech oil	2	fl. ozs.	Fennel along steep access rd	62719-527	Backpack	Ryan Gerlach	29-Jun-10	
	Bernal	Garlon 4 Ultra + Spraytech oil	4	fl. ozs.	fennel on north-facing slope	62719-527	cut stump	Ryan Gerlach, Venny Garcia	23-Aug-10	
	Twin Peaks	Garlon 4 Ultra + Spraytech oil	78	fl. ozs.	Slope above Burnett: French Broom, Cotoneaster	62719-527	Cut stump	Ventura Garcia, Ben Adamo, Paul Wilson, Jake Hanower	20-Oct-10	
	Glen Park	Garlon 4 Ultra + Spraytech oil	2.5	fl. ozs.	Slope above Burnett: French Broom, Cotoneaster	62719-527	Cut stump	Paul Wilson, Shellie Prescott	21-Oct-10	
	Glen Park	Garlon 4 Ultra + Spraytech oil	27	fl. ozs.	Monocot City: French Broom, Cotoneaster	62719-527	Cut stump	Paul Wilson, Shellie Prescott	22-Oct-10	
	RPD Glen Park Natural Areas	GARLON 4UL	1	fl. ozs.	Weeds-misc	62719527AA62719		Hayes, D	4-Nov-10	
	RPD Golden Gate Park- SEC 2	GARLON 4UL	4	fl. ozs.	Weeds-misc	62719527AA62719		Hayes, D	12-Nov-10	
	RPD-Twin Peaks	GARLON 4UL	8	fl. ozs.	Weeds-misc	62719527AA62719		Gerlach, Ryan	24-Nov-10	
	RPD-Twin Peaks	GARLON 4UL	10	fl. ozs.	Weeds-misc	62719527AA62719		Garcia, Shelter Belt	16-Dec-10	
Total GARLON 2010			340.169							
ROUNDUP										
17698	landscape	ROUNDUP PRO DRY	1.8	ozs.	cape ivy	524-505	Spray	HAYES, DYLAN	14-Feb-08	
17767	twin peaks- eharta	ROUNDUP PRODRY	4	ozs.	arctotheca	524-505	Spray	DE MEO, LICIA	7-Mar-08	
17768	west grassland brooks	ROUNDUP PRODRY	9.8	ozs.	weeds	524-505	Spray	HAYES, DYLAN	11-Mar-08	
17769	Edgehill- eharta	ROUNDUP PRODRY	8	ozs.	weeds	524-505	Spray	ZEBELL, RANDOLPH (RANDY)	20-Mar-08	
17770	Brooks- eharta	ROUNDUP PRODRY	4.8	ozs.	weeds	524-505	Spray	HAYES, DYLAN	20-Mar-08	
17882		ROUNDUP PRO HERBICIDE	2	fl. ozs.	stumps	524-475-2A-524	Spray	ANNESE, THOMAS (TOM)	13-Jun-08	
17766	Mc Laren marsh area	RODEO AQUATIC HERBICIDE (Glyphosate, Dow)	2.6	fl. ozs.	arctotheca	524-343-AA-524	Spray	DE MEO, LICIA	7-Mar-08	

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		TOTAL ROUNDUP 2008	33							
18399	gazenia	ROUNDUP PRODRY	1.6	ozs	weeds	524-505	Spray	19-May-09	Lisa Wayne	
18400	hawk hill	ROUNDUP PRODRY	4.8	ozs	weeds	524-505	Spray	26-May-09	Lisa Wayne	
18578	upper grassland	ROUNDUP PRODRY	6.4	ozs	weeds	524-505	Spray	1-Oct-09	Lisa Wayne	
18579	billy goat hill	ROUNDUP PRODRY	0.8	ozs	weeds	524-505	Spray	8-Oct-09	Lisa Wayne	
18580	edgehill	ROUNDUP PRODRY	9	ozs	weeds	524-505	Spray	9-Oct-09	Lisa Wayne	
18581	McLaren	ROUNDUP PRODRY	4.8	ozs	weeds	524-505	Spray	29-Oct-09	Lisa Wayne	
		TOTAL ROUNDUP 2009	27.4							
18735	Pine Lake	Aquamaster	16		Pine Lake/ cape ivy	524-343	Backpack	Mark Heath	11-Mar-10	2%
	Lake Merced	Aquamaster	8		Ludwigia	524-343	sprayer	JC	14-Jul-10	2%
	Lake Merced	Aquamaster	2		Impound lake - Ludwigia	524-343	Backpack	R Zebell	2-Sep-10	2%
	Glen Park	Aquamaster + Spraytech Oil	22		Site C above Silver Tree: French Broom and Poison Oak	524-343	sprayer	Ventura Garcia, Ben Adamo	15-Oct-10	2 oz/ gal
	Glen Park	Aquamaster + Spraytech Oil	30		Monocot City: French Broom, Cotoneaster	524-343	Cut stump	Ventura Garcia, Ben Adamo	15-Oct-10	50%
	Twin Peaks	Aquamaster + Spraytech Oil	8		Slope above Burnett: Jupiter's Beard	524-343	Backpack	Ventura Garcia, Ben Adamo, Paul Wilson, Jake Harrower	20-Oct-10	2%
	McLaren	Roundup Pro	3.6		Arctotheca - Upper meadow, Yosemite Marsh	524-475	Backpack	L. DeMeo	9-Sep-10	2%
	Glen Canyon, Fox Meadow	Roundup Pro [Max]	6.4		Fox Meadow - Poison oak and mustard	524-579	backpack	Licia De Meo, Dylan Hayes	3-Aug-10	2%
	Sharp Park	Roundup Pro [Max]	1.3		Pampas grass	524-579	hand sprayer	Kirra Swenerton	26-Aug-10	2%
18668	Mt Davidson	Roundup Pro Dry	1		erhata - grasslands - edge of forest	524-505	Backpack	Chnstopher Campbell	3-Feb-10	0.50%
18722	Mt Davidson	Roundup Pro Dry	3		Erhata	524-505	Backpack	illeg	18-Mar-10	1%
18724	McLaren	Roundup Pro Dry	6.0		Upper Yosemite Marsh - arctotheca, Kikuyu burclover	524-505	Backpack	Licia DeMeo/ Christopher Campbell	24-Mar-10	2%
	Hawk Hill	Roundup Pro Dry	3		slope - erhata	524-505	Backpack	Zebell, R	22-Apr-10	1.50%
	Glen Canyon/ Fox meadow	Roundup Pro Dry	4.5		Radish, erhata	524-505	Backpack	Swenerton, K	22-Apr-10	2%
	Edgehill	Roundup Pro Dry	9		Edgehill - planted area/ erhata	524-505	Backpack	R Zebell, C Campbell	4-May-10	1%
	Sharp Park	Roundup Pro Dry	1.5		Pampas grass	524-505	hand sprayer	Kirra Swenerton	26-Aug-10	2%
18721	Mt Davidson	Roundup Pro Max	9		Erhata	524-?	Backpack	Ryan Gerlach	16-Mar-10	1%
18723	Glen Canyon	Roundup Pro Max	9.0		Area A - hemlock thistle	524-579	Backpack	shelterbelt/ Ryan Gerlach	23-Mar-10	1oz/ gallon
	Twin Peaks	Roundup Pro Max	4		sprayed French Broom that was missed or too small to pull along Burnett	524-579	sprayer	Shelterbelt/ Gerlach	26-Apr-10	1.56%
	Oak Woodlands (GGP)	Roundup Pro Max			cape ivy	524-579		(Shelterbelt) Gerlach/ Garcia	?	0.80%
	McLaren	Roundup Pro Max	6.8		Fennel - south of Mansell, east of Visitation	524-579	Backpack	Ryan Gerlach, Ventura Garcia	23-Jun-10	1.5 oz/ gal
	Bayview	Roundup Pro Max	18		Fennel- grasslands	524-579	Backpack	Ryan Gerlach, Ventura Garcia	23-Jun-10	1.5 oz/ gal
	Twin Peaks	Roundup Pro Max	1		Patch of erhata off Twin Peaks	524-579	Backpack	Ryan Gerlach	12-Aug-10	1oz/gal
	McLaren Park	Roundup Pro Max	3		Patch of pampas grass off Visitation	524-579	Backpack	Venny Garcia	12-Aug-10	2 oz/ gal
	RPD Mt Davidson	AQUAMASTER	34.432		Weeds-erhata	524343ZF524		Gerlach, Ryan	3-Nov-10	
	RPD Golden Gate Park/ SEC 1	AQUAMASTER	14.3646		Weeds-ivy	524343ZF524		Gerlach, Ryan	4-Nov-10	
	RPD Mt Davidson	AQUAMASTER	2.8514		Weeds-blackberry	524343ZF524			4-Nov-10	
	RPD John McLaren Park	ROUNDUP PR	5.844		Weeds-misc	524579AA524		Taylor, Zack	16-Nov-10	
	RPD Lake Merced Park	AQUAMASTER	1.883		Weeds-misc	524343ZF524		Zebell, R	16-Nov-10	
	RPD Twin Peaks	ROUNDUP PR	0.2435		Weeds-pampas grass	524579AA524		Garcia, Shelter Belt	16-Dec-10	

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RPD Glen Park Natural Areas	ROUNDUP PR	4.383		Weeds-misc	524579AA524		Garcia, Shelter Belt	27-Dec-10		
	TOTAL ROUNDUP/ AQUAMASTER 2010	240.102								
OTHER STUFF										
18088	SAPPHIRE (Penoxsulam frn Dow)	96	fl.ozs.	english daisy	62719-547	Boom Spray		9-Sep-08		Against daisies - golf courses
18089	HABITAT (Imazapyr from BASF)	5.8	fl.ozs.	invasive weeds	241-426	Spray		9-Sep-08		Lisa Wayne
18334	MILESTONE (aminopyralid from Dow)	10.8	fl.ozs.	cape ivy	62719-519	Spray		13-Mar-09	09-Mar-09	Lisa Wayne
18582	HABITAT (Imazapyr from BASF)	4	fl.ozs.	ludwegia	241-426	Spray		1-Oct-09		Lisa Wayne
18736	MILESTONE (aminopyralid from Dow)	1	fl.ozs.		62719-537	backpack		11-Mar-10		Mark Heath
RPD Golden Gate Park- SEC 1	MILESTONE	0.6496		Weeds-ivy	62719537AA62719		Gerlach, Ryan	4 Nov-10		

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Attachment II.A

[illegible]

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Attachment II-B

Mary McAllister

From: "Mary McAllister" <marymcallister@comcast.net>
To: "Lisa Wayne" <Lisa.Wayne@sfgov.org>
Cc: <Chris.Geiger@sfgov.org>; <Ralph.Montana@sfgov.org>
Sent: Wednesday, February 09, 2011 9:03 AM
Attach: twin-peaks-garlon-feb-2011-notice.jpg; spraying-garlon-twin-peaks-feb-2011.jpg
Subject: Violation of City's IPM policy

Dear Lisa, Attached are photos of a pesticide application on February 3rd on Twin Peaks, near the reservoir. According to the corresponding Notice of Pesticide Application, the person was spraying Garlon 4 Ultra. It appears that the person doing the spraying is not wearing a respirator.

As you know, the IPM policy that was approved on January 25th by the Commission on the Environment has approved the restricted use of Garlon 4 and Garlon 4 Ultra as follows: "Use only for targeted treatments of high profile or highly invasive exotics via dabbing or injection. May use for targeted spraying only when dabbing or injection are not feasible, and **only with use of a respirator**. HIGH PRIORITY TO FIND ALTERNATIVE." (emphasis added). Therefore, the person photographed spraying Garlon 4 Ultra was not in compliance with the city's IPM policy.

I hope, for the safety of your staff and your sub-contractors, that those who are responsible for spraying this toxic chemical will be informed that they must wear a respirator in the future. As you know, the City's IPM policy classifies this chemical as "Tier I Most Hazardous." The Material Safety Data Sheet for this chemical reports that OSHA classifies this chemical as both an "Immediate" and a "Delayed Health Hazard."

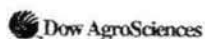
Thank you for your attention to this important matter.

Mary McAllister

10/13/2011

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Attachment II-C



Material Safety Data Sheet

Dow AgroSciences LLC

Product Name: GARLON* 4 Herbicide**Issue Date:** 03/09/2009**Print Date:** 12 Mar 2009

Dow AgroSciences LLC encourages and expects you to read and understand the entire (M)SDS, as there is important information throughout the document. We expect you to follow the precautions identified in this document unless your use conditions would necessitate other appropriate methods or actions.

1. Product and Company Identification

Product Name
GARLON* 4 Herbicide

COMPANY IDENTIFICATION
Dow AgroSciences LLC
A Subsidiary of The Dow Chemical Company
9330 Zionsville Road
Indianapolis, IN 46268-1189
USA

Customer Information Number: 800-992-5994

EMERGENCY TELEPHONE NUMBER

24-Hour Emergency Contact: 800-992-5994
Local Emergency Contact: 800-992-5994

2. Hazards Identification

Emergency Overview

Color: Yellow

Physical State: Liquid.

Odor: Gasoline-like

Hazards of product:

WARNING! May cause skin irritation. May cause allergic skin reaction. May cause eye irritation.

OSHA Hazard Communication Standard

This product is a "Hazardous Chemical" as defined by the OSHA Hazard Communication Standard, 29 CFR 1910.1200.

Potential Health Effects

Eye Contact: May cause eye irritation. Corneal injury is unlikely. May cause pain disproportionate to the level of irritation to eye tissues.

* Indicates a Trademark

* Indicates a Trademark of Dow AgroSciences LLC

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Product Name: GARLON® 4 Herbicide

Issue Date: 03/09/2009

Skin Contact: Brief contact may cause moderate skin irritation with local redness. Prolonged contact may cause moderate skin irritation with local redness. Repeated contact may cause moderate skin irritation with local redness. May cause drying and flaking of the skin.

Skin Absorption: Prolonged skin contact is unlikely to result in absorption of harmful amounts.

Skin Sensitization: Has caused allergic skin reactions when tested in guinea pigs. With the dilute mix, no allergic skin reaction is expected.

Inhalation: Prolonged excessive exposure to mist may cause adverse effects. Mist may cause irritation of upper respiratory tract (nose and throat).

Ingestion: Low toxicity if swallowed. Small amounts swallowed incidentally as a result of normal handling operations are not likely to cause injury; however, swallowing larger amounts may cause injury.

Aspiration hazard: Aspiration into the lungs may occur during ingestion or vomiting, causing lung damage or even death due to chemical pneumonia.

Effects of Repeated Exposure: In animals, effects have been reported on the following organs: Skin. Repeated excessive exposure may cause adverse effects.

Cancer Information: In a lifetime animal dermal carcinogenicity study, an increased incidence of skin tumors was observed when kerosene was applied at doses that also produced skin irritation. This response was similar to that produced in skin by other types of chronic chemical/physical irritation. No increase in tumors was observed when non-irritating dilutions of kerosene were applied at equivalent doses, indicating that kerosene is unlikely to cause skin cancer in the absence of long-term continued skin irritation. In long-term animal studies with ethylene glycol butyl ether, small but statistically significant increases in tumors were observed in mice but not rats. The effects are not believed to be relevant to humans. If the material is handled in accordance with proper industrial handling procedures, exposures should not pose a carcinogenic risk to man.

Birth Defects/Developmental Effects: For the active ingredient(s): Has been toxic to the fetus in laboratory animals at doses toxic to the mother. For the minor component(s): Has caused birth defects in lab animals only at doses producing severe toxicity in the mother. Has been toxic to the fetus in laboratory animals at doses toxic to the mother.

Reproductive Effects: For similar active ingredient(s). Triclopyr. For the minor component(s) In laboratory animal studies, effects on reproduction have been seen only at doses that produced significant toxicity to the parent animals.

3. Composition Information

Component	CAS #	Amount
Triclopyr-2-butoxyethyl ester	64700-56-7	61.6 %
Kerosene (petroleum)	8008-20-6	>= 18.6 - <= 31.0 %
Ethylene glycol monobutyl ether	111-76-2	0.5 %
Solvent naphtha (petroleum), light aromatic	64742-95-6	0.2 %
Balance		>= 6.7 - <= 19.1 %

4. First-aid measures

Eye Contact: Hold eyes open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eyes. Call a poison control center or doctor for treatment advice.

Skin Contact: Take off contaminated clothing. Wash skin with soap and plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice. Wash clothing before reuse. Shoes and other leather items which cannot be decontaminated should be disposed of properly.

Inhalation: Move person to fresh air. If person is not breathing, call an emergency responder or ambulance, then give artificial respiration; if by mouth to mouth use rescuer protection (pocket mask etc). Call a poison control center or doctor for treatment advice.

Ingestion: Immediately call a poison control center or doctor. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give any liquid to the person. Do not give anything by mouth to an unconscious person.

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Product Name: GARLON® 4 Herbicide

Issue Date: 03/09/2009

Notes to Physician: The decision of whether to induce vomiting or not should be made by a physician. If lavage is performed, suggest endotracheal and/or esophageal control. Danger from lung aspiration must be weighed against toxicity when considering emptying the stomach. No specific antidote. Treatment of exposure should be directed at the control of symptoms and the clinical condition of the patient. Have the Safety Data Sheet, and if available, the product container or label with you when calling a poison control center or doctor, or going for treatment.

Medical Conditions Aggravated by Exposure: Skin contact may aggravate preexisting dermatitis.

5. Fire Fighting Measures

Extinguishing Media: Water fog or fine spray. Dry chemical fire extinguishers. Carbon dioxide fire extinguishers. Foam. Alcohol resistant foams (ATC type) are preferred. General purpose synthetic foams (including AFFF) or protein foams may function, but will be less effective.

Fire Fighting Procedures: Keep people away. Isolate fire and deny unnecessary entry. Consider feasibility of a controlled burn to minimize environment damage. Foam fire extinguishing system is preferred because uncontrolled water can spread possible contamination. Use water spray to cool fire exposed containers and fire affected zone until fire is out and danger of reignition has passed. Fight fire from protected location or safe distance. Consider the use of unmanned hose holders or monitor nozzles. Immediately withdraw all personnel from the area in case of rising sound from venting safety device or discoloration of the container. Burning liquids may be extinguished by dilution with water. Do not use direct water stream. May spread fire. Move container from fire area if this is possible without hazard. Burning liquids may be moved by flushing with water to protect personnel and minimize property damage. Contain fire water run-off if possible. Fire water run-off, if not contained, may cause environmental damage. Review the "Accidental Release Measures" and the "Ecological Information" sections of this (M)SDS.

Special Protective Equipment for Firefighters: Wear positive-pressure self-contained breathing apparatus (SCBA) and protective fire fighting clothing (includes fire fighting helmet, coat, trousers, boots, and gloves). Avoid contact with this material during fire fighting operations. If contact is likely, change to full chemical resistant fire fighting clothing with self-contained breathing apparatus. If this is not available, wear full chemical resistant clothing with self-contained breathing apparatus and fight fire from a remote location. For protective equipment in post-fire or non-fire clean-up situations, refer to the relevant sections.

Unusual Fire and Explosion Hazards: Container may rupture from gas generation in a fire situation. Violent steam generation or eruption may occur upon application of direct water stream to hot liquids. Dense smoke is produced when product burns.

Hazardous Combustion Products: During a fire, smoke may contain the original material in addition to combustion products of varying composition which may be toxic and/or irritating. Combustion products may include and are not limited to: Phosgene. Nitrogen oxides. Hydrogen chloride. Carbon monoxide. Carbon dioxide.

6. Accidental Release Measures

Steps to be Taken if Material is Released or Spilled: Contain spilled material if possible. Small spills: Absorb with materials such as: Clay. Dirt. Sand. Sweep up. Collect in suitable and properly labeled containers. Large spills: Contact Dow AgroSciences for clean-up assistance.

Personal Precautions: Use appropriate safety equipment. For additional information, refer to Section 8, Exposure Controls and Personal Protection.

Environmental Precautions: Prevent from entering into soil, ditches, sewers, waterways and/or groundwater. See Section 12, Ecological Information.

7. Handling and Storage

Handling

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Product Name: GARLON® 4 Herbicide**Issue Date:** 03/09/2009

General Handling: Containers, even those that have been emptied, can contain vapors. Do not cut, drill, grind, weld, or perform similar operations on or near empty containers. Spills of these organic materials on hot fibrous insulations may lead to lowering of the autoignition temperatures possibly resulting in spontaneous combustion. Keep out of reach of children. Do not swallow. Avoid breathing vapor or mist. Avoid contact with eyes, skin, and clothing. Use with adequate ventilation. Wash thoroughly after handling.

Storage

Store in a dry place. Store in original container. Keep container tightly closed. Do not store near food, foodstuffs, drugs or potable water supplies.

8. Exposure Controls / Personal Protection

Exposure Limits

Component	List	Type	Value
Kerosene (petroleum)	Dow IHG	TWA as total hydrocarbon vapor	10 mg/m3 SKIN
	ACGIH	TWA Non-aerosol. as total hydrocarbon vapor	200 mg/m3 P: Application restricted to conditions in which there are negligible aerosol exposures.
Triclopyr-2-butoxyethyl ester	Dow IHG	TWA	2 mg/m3 D-SEN

RECOMMENDATIONS IN THIS SECTION ARE FOR MANUFACTURING, COMMERCIAL BLENDING AND PACKAGING WORKERS. APPLICATORS AND HANDLERS SHOULD SEE THE PRODUCT LABEL FOR PROPER PERSONAL PROTECTIVE EQUIPMENT AND CLOTHING. A "skin" notation following the inhalation exposure guideline refers to the potential for dermal absorption of the material including mucous membranes and the eyes either by contact with vapors or by direct skin contact. It is intended to alert the reader that inhalation may not be the only route of exposure and that measures to minimize dermal exposures should be considered.

Personal Protection

Eye/Face Protection: Use safety glasses.

Skin Protection: Use protective clothing chemically resistant to this material. Selection of specific items such as face shield, boots, apron, or full body suit will depend on the task. Remove contaminated clothing immediately, wash skin area with soap and water, and launder clothing before reuse or dispose of properly. Items which cannot be decontaminated, such as shoes, belts and watchbands, should be removed and disposed of properly.

Hand protection: Use gloves chemically resistant to this material. Examples of preferred glove barrier materials include: Chlorinated polyethylene. Neoprene. Nitrile/butadiene rubber ("nitrile" or "NBR"). Polyethylene. Ethyl vinyl alcohol laminate ("EVAL"). Examples of acceptable glove barrier materials include: Butyl rubber. Natural rubber ("latex"). Polyvinyl chloride ("PVC" or "vinyl"). Viton. NOTICE: The selection of a specific glove for a particular application and duration of use in a workplace should also take into account all relevant workplace factors such as, but not limited to: Other chemicals which may be handled, physical requirements (cut/puncture protection, dexterity, thermal protection), potential body reactions to glove materials, as well as the instructions/specifications provided by the glove supplier.

Respiratory Protection: Respiratory protection should be worn when there is a potential to exceed the exposure limit requirements or guidelines. If there are no applicable exposure limit requirements or guidelines, wear respiratory protection when adverse effects, such as respiratory irritation or discomfort have been experienced, or where indicated by your risk assessment process. In misty atmospheres, use an approved particulate respirator. The following should be effective types of air-purifying respirators: Organic vapor cartridge with a particulate pre-filter.

Ingestion: Use good personal hygiene. Do not consume or store food in the work area. Wash hands before smoking or eating.

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Product Name: GARLON® 4 Herbicide

Issue Date: 03/09/2009

Engineering Controls

Ventilation: Use engineering controls to maintain airborne level below exposure limit requirements or guidelines. If there are no applicable exposure limit requirements or guidelines, use only with adequate ventilation. Local exhaust ventilation may be necessary for some operations.

9. Physical and Chemical Properties

Physical State	Liquid.
Color	Yellow
Odor	Gasoline-like
Flash Point - Closed Cup	64 °C (147 °F) <i>Closed Cup</i>
Flammable Limits In Air	Lower: No test data available Upper: No test data available
Autoignition Temperature	No test data available
Vapor Pressure	0.1 mmHg @ 37.8 °C <i>Literature</i> (kerosene)
Boiling Point (760 mmHg)	>= 150 °C (>= 302 °F) <i>Literature</i> (initial).
Vapor Density (air = 1)	1 <i>Literature</i>
Specific Gravity (H2O = 1)	1.08 <i>Literature</i> <i>Pyknometer</i>
Liquid Density	1.09 g/cm3 <i>Calculated</i>
Freezing Point	No test data available
Melting Point	Not applicable
Solubility in water (by weight)	emulsifiable
pH	6.4 <i>pH Electrode</i>
Decomposition Temperature	No test data available

10. Stability and Reactivity

Stability/Instability

Thermally stable at typical use temperatures.

Conditions to Avoid: Active ingredient decomposes at elevated temperatures. Generation of gas during decomposition can cause pressure in closed systems.

Incompatible Materials: Avoid contact with: Acids. Bases. Oxidizers.

Hazardous Polymerization

Will not occur.

Thermal Decomposition

Decomposition products depend upon temperature, air supply and the presence of other materials. Decomposition products can include and are not limited to: Carbon monoxide. Carbon dioxide. Hydrogen chloride. Nitrogen oxides. Phosgene. Toxic gases are released during decomposition.

11. Toxicological Information

Acute Toxicity**Ingestion**

LD50, Rat, male 1,581 mg/kg

LD50, Rat, female 1,338 mg/kg

Skin Absorption

LD50, Rabbit, male and female > 2,000 mg/kg

Inhalation

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Product Name: GARLON® 4 Herbicide**Issue Date:** 03/09/2009

|| LC50, 4 h, Aerosol, Rat, male and female > 5.2 mg/l

Sensitization**Skin**

|| Has caused allergic skin reactions when tested in guinea pigs. With the dilute mix, no allergic skin reaction is expected.

Repeated Dose Toxicity

|| In animals, effects have been reported on the following organs: Skin. Repeated excessive exposure may cause adverse effects.

Chronic Toxicity and Carcinogenicity

|| Active ingredient did not cause cancer in laboratory animals. In a lifetime animal dermal carcinogenicity study, an increased incidence of skin tumors was observed when kerosene was applied at doses that also produced skin irritation. This response was similar to that produced in skin by other types of chronic chemical/physical irritation. No increase in tumors was observed when non-irritating dilutions of kerosene were applied at equivalent doses, indicating that kerosene is unlikely to cause skin cancer in the absence of long-term continued skin irritation. In long-term animal studies with ethylene glycol butyl ether, small but statistically significant increases in tumors were observed in mice but not rats. The effects are not believed to be relevant to humans. If the material is handled in accordance with proper industrial handling procedures, exposures should not pose a carcinogenic risk to man.

Carcinogenicity Classifications:

Component	List	Classification
Kerosene (petroleum)	ACGIH	Confirmed animal carcinogen with unknown relevance to humans.; Group A3
Ethylene glycol monobutyl ether	ACGIH	Confirmed animal carcinogen with unknown relevance to humans.; Group A3

Developmental Toxicity

|| For the active ingredient(s): Has been toxic to the fetus in laboratory animals at doses toxic to the mother. Active ingredient did not cause birth defects in laboratory animals. For the minor component(s): Has caused birth defects in lab animals only at doses producing severe toxicity in the mother. Has been toxic to the fetus in laboratory animals at doses toxic to the mother. For kerosene: Did not cause birth defects or any other fetal effects in laboratory animals.

Reproductive Toxicity

|| For similar active ingredient(s): Triclopyr. For the minor component(s) In laboratory animal studies, effects on reproduction have been seen only at doses that produced significant toxicity to the parent animals. For kerosene: Limited data in laboratory animals suggest that the material does not affect reproduction.

Genetic Toxicology

|| For the active ingredient(s): For kerosene: In vitro genetic toxicity studies were negative. For the active ingredient(s): For the component(s) tested: Animal genetic toxicity studies were negative.

12. Ecological Information**ENVIRONMENTAL FATE**Data for Component: Triclopyr-2-butoxyethyl ester**Movement & Partitioning**

Bioconcentration potential is moderate (BCF between 100 and 3000 or Log Pow between 3 and 5). Based largely or completely on information for similar material(s). Potential for mobility in soil is medium (Koc between 150 and 500).

Partition coefficient, n-octanol/water (log Pow): 4.09 - 4.49 Measured**Persistence and Degradability**

Chemical degradation (hydrolysis) is expected in the environment. Material is expected to biodegrade only very slowly (in the environment). Fails to pass OECD/EEC tests for ready biodegradability.

Stability in Water (1/2-life):

12 h; 25 °C; pH 6.7

6.6 d; pH 5

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Product Name: GARLON® 4 Herbicide**Issue Date:** 03/09/2009**OECD Biodegradation Tests:**

Biodegradation	Exposure Time	Method
18 %	28 d	OECD 301B Test

Theoretical Oxygen Demand: 1.39 mg/mg**Data for Component:** Kerosene (petroleum)**Movement & Partitioning**

Based largely or completely on component information. Bioconcentration potential is high (BCF > 3000 or Log Pow between 5 and 7).

Partition coefficient, n-octanol/water (log Pow): 3.3 - 6 Estimated**Bioconcentration Factor (BCF):** 61 - 159; fish**Persistence and Degradability**

Biodegradation under aerobic static laboratory conditions is high (BOD20 or BOD28/ThOD > 40%).

Data for Component: Ethylene glycol monobutyl ether**Movement & Partitioning**

Bioconcentration potential is low (BCF less than 100 or log Pow less than 3). Potential for mobility in soil is high (Koc between 50 and 150).

Henry's Law Constant (H): 1.60E-06 atm·m³/mole Measured**Partition coefficient, n-octanol/water (log Pow):** 0.83 Measured**Partition coefficient, soil organic carbon/water (Koc):** 67 Estimated**Persistence and Degradability**

Material is readily biodegradable. Passes OECD test(s) for ready biodegradability. Material is ultimately biodegradable (reaches > 70% mineralization in OECD test(s) for inherent biodegradability).

OECD Biodegradation Tests:

Biodegradation	Exposure Time	Method
95 %	28 d	OECD 301E Test
100 %	28 d	OECD 302B Test

Biological oxygen demand (BOD):

BOD 5	BOD 10	BOD 20	BOD 28
5.2 %	57 %	72.2 %	

Chemical Oxygen Demand: 2.21 mg/g**Theoretical Oxygen Demand:** 2.30 mg/mg**Data for Component:** Solvent naphtha (petroleum), light aromatic**Movement & Partitioning**

For the major component(s): Bioconcentration potential is moderate (BCF between 100 and 3000 or Log Pow between 3 and 5). Potential for mobility in soil is low (Koc between 500 and 2000). For the minor component(s): Bioconcentration potential is low (BCF < 100 or Log Pow < 3).

Partition coefficient, n-octanol/water (log Pow): No test data available:**Persistence and Degradability**

For the major component(s): Biodegradation under aerobic static laboratory conditions is high (BOD20 or BOD28/ThOD > 40%). For some component(s): Biodegradation under aerobic static laboratory conditions is low (BOD20 or BOD28/ThOD between 2.5 and 10%).

ECOTOXICITY

Material is highly toxic to aquatic organisms on an acute basis (LC50/EC50 between 0.1 and 1 mg/L in the most sensitive species tested). Material is slightly toxic to birds on an acute basis (LD50 between 501 and 2000 mg/kg).

Fish Acute & Prolonged ToxicityLC50, fathead minnow (*Pimephales promelas*), static, 96 h: 2.2 - 6.3 mg/lLC50, rainbow trout (*Oncorhynchus mykiss*), flow-through, 96 h: 0.8 - 0.98 mg/l**Aquatic Invertebrate Acute Toxicity**LC50, water flea *Daphnia magna*, static, 48 h, survival: 1.7 - 18.8 mg/l

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Product Name: GARLON® 4 Herbicide**Issue Date:** 03/09/2009|| LC50, water flea *Daphnia magna*, flow-through, 48 h, survival: 0.43 mg/l**Aquatic Plant Toxicity**|| EC50, green alga *Pseudokirchneriella subcapitata* (formerly known as *Selenastrum capricornutum*), biomass growth inhibition, 5 d: 13.3 mg/l**Toxicity to Non-mammalian Terrestrial Species**|| oral LD50, bobwhite (*Colinus virginianus*): 1,350 mg/kg|| oral LD50, Honey bee (*Apis mellifera*): > 100 micrograms/bee|| contact LD50, Honey bee (*Apis mellifera*): > 100 micrograms/bee**Toxicity to Soil Dwelling Organisms**|| LC50, Earthworm *Eisenia foetida*, adult, 7 d: 910 mg/kg**13. Disposal Considerations**

If wastes and/or containers cannot be disposed of according to the product label directions, disposal of this material must be in accordance with your local or area regulatory authorities. This information presented below only applies to the material as supplied. The identification based on characteristic(s) or listing may not apply if the material has been used or otherwise contaminated. It is the responsibility of the waste generator to determine the toxicity and physical properties of the material generated to determine the proper waste identification and disposal methods in compliance with applicable regulations. If the material as supplied becomes a waste, follow all applicable regional, national and local laws.

14. Transport Information**DOT Non-Bulk**

NOT REGULATED

DOT Bulk**Proper Shipping Name:** COMBUSTIBLE LIQUID, N.O.S.**Technical Name:** CONTAINS KEROSENE**Hazard Class:** COMBUSTIBLE LIQUID **ID Number:** NA1993 **Packing Group:** PG III**IMDG****Proper Shipping Name:** ENVIRONMENTALLY HAZARDOUS SUBSTANCES, LIQUID, N.O.S**Technical Name:** Contains Triclopyr-2-butoxyethyl Ester, KEROSENE**Hazard Class:** 9 **ID Number:** UN3082 **Packing Group:** PG III**EMS Number:** f-a,s-f**Marine pollutant:** Yes**ICAO/IATA**

NOT REGULATED

Additional Information

MARINE POLLUTANT (Contains Triclopyr and Kerosene)

This information is not intended to convey all specific regulatory or operational requirements/information relating to this product. Additional transportation system information can be obtained through an authorized sales or customer service representative. It is the responsibility of the transporting organization to follow all applicable laws, regulations and rules relating to the transportation of the material.

15. Regulatory Information**OSHA Hazard Communication Standard**

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Product Name: GARLON® 4 Herbicide**Issue Date:** 03/09/2009

This product is a "Hazardous Chemical" as defined by the OSHA Hazard Communication Standard, 29 CFR 1910.1200.

Superfund Amendments and Reauthorization Act of 1986 Title III (Emergency Planning and Community Right-to-Know Act of 1986) Sections 311 and 312

Immediate (Acute) Health Hazard	Yes
Delayed (Chronic) Health Hazard	Yes
Fire Hazard	Yes
Reactive Hazard	No
Sudden Release of Pressure Hazard	No

Superfund Amendments and Reauthorization Act of 1986 Title III (Emergency Planning and Community Right-to-Know Act of 1986) Section 313

To the best of our knowledge, this product does not contain chemicals at levels which require reporting under this statute.

Pennsylvania (Worker and Community Right-To-Know Act): Pennsylvania Hazardous Substances List and/or Pennsylvania Environmental Hazardous Substance List:

The following product components are cited in the Pennsylvania Hazardous Substance List and/or the Pennsylvania Environmental Substance List, and are present at levels which require reporting.

Component	CAS #	Amount
Kerosene (petroleum)	8008-20-6	>= 18.6 - <= 31.0 %

Pennsylvania (Worker and Community Right-To-Know Act): Pennsylvania Special Hazardous Substances List:

To the best of our knowledge, this product does not contain chemicals at levels which require reporting under this statute.

Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) Section 103

To the best of our knowledge, this product does not contain chemicals at levels which require reporting under this statute.

California Proposition 65 (Safe Drinking Water and Toxic Enforcement Act of 1986)

This product contains no listed substances known to the State of California to cause cancer, birth defects or other reproductive harm, at levels which would require a warning under the statute.

Toxic Substances Control Act (TSCA)

All components of this product are on the TSCA Inventory or are exempt from TSCA Inventory requirements under 40 CFR 720.30

16. Other Information

Hazard Rating System

NFPA	Health	Fire	Reactivity
	2	2	1

Revision

Identification Number: 50683 / 1016 / Issue Date 03/09/2009 / Version: 8.0

DAS Code: XRM-4714

Most recent revision(s) are noted by the bold, double bars in left-hand margin throughout this document.

Legend

N/A	Not available
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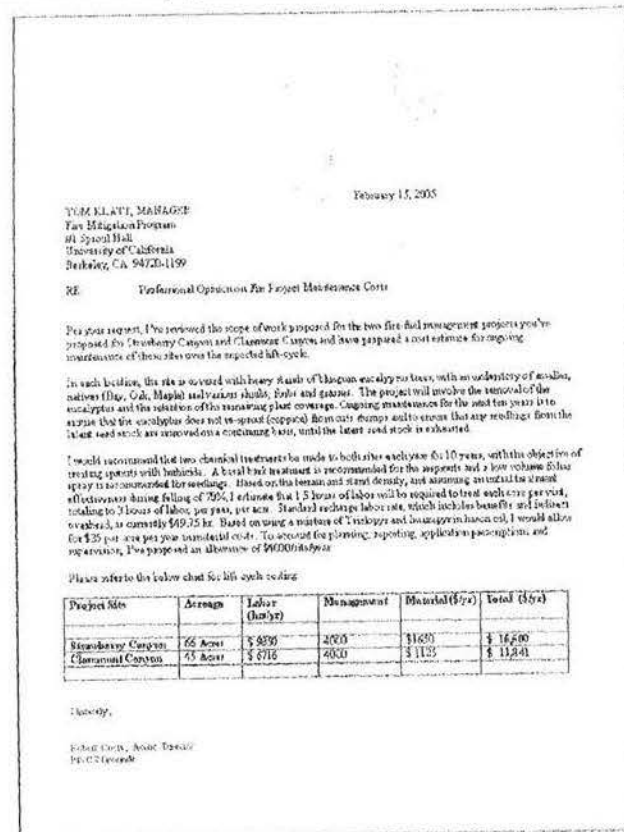
Product Name: GARLON® 4 Herbicide**Issue Date:** 03/09/2009

WW	Weight/Weight
OEL	Occupational Exposure Limit
STEL	Short Term Exposure Limit
TWA	Time Weighted Average
ACGIH	American Conference of Governmental Industrial Hygienists, Inc.
DOW IHG	Dow Industrial Hygiene Guideline
WEEL	Workplace Environmental Exposure Level
HAZ DES	Hazard Designation
Action Level	A value set by OSHA that is lower than the PEL which will trigger the need for activities such as exposure monitoring and medical surveillance if exceeded.

Dow AgroSciences LLC urges each customer or recipient of this (M)SDS to study it carefully and consult appropriate expertise, as necessary or appropriate, to become aware of and understand the data contained in this (M)SDS and any hazards associated with the product. The information herein is provided in good faith and believed to be accurate as of the effective date shown above. However, no warranty, express or implied, is given. Regulatory requirements are subject to change and may differ between various locations. It is the buyer's/user's responsibility to ensure that his activities comply with all federal, state, provincial or local laws. The information presented here pertains only to the product as shipped. Since conditions for use of the product are not under the control of the manufacturer, it is the buyer's/user's duty to determine the conditions necessary for the safe use of this product. Due to the proliferation of sources for information such as manufacturer-specific (M)SDSs, we are not and cannot be responsible for (M)SDSs obtained from any source other than ourselves. If you have obtained an (M)SDS from another source or if you are not sure that the (M)SDS you have is current, please contact us for the most current version.

PROJECT MAINTENANCE COSTS:

The University of California, Berkeley, Associate Director of Physical Plant, Robert Costa, completed an estimate of life-cycle maintenance costs for the 2 UC projects. The letter containing Mr. Costa's opinion is embedded on the page that follows:



BCA Data Documentation3.doc

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Attachment II-D

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**Public Comment of the San Francisco Forest Alliance
Draft Environmental Impact Report for the Natural Resource Areas Management Plan
Part III: The impact of the Natural Areas Program on wildlife**

In this public comment, we will provide evidence that the Natural Areas Program has had a significant negative impact on legally protected wildlife as well as all wildlife in San Francisco's parks.

1. The Natural Areas Program has violated California Fish & Game Code, Sections 1600-1616 regarding streambed alteration and the federal Migratory Bird Treaty Act by conducting the destructive phase of their project in Glen Canyon Park during breeding and nesting season.
2. The Natural Areas Program is violating the Endangered Species Act by using pesticides known to be harmful to butterflies on Twin Peaks, where they have been reintroducing the endangered Mission Blue butterfly for several years.
3. The Natural Areas Program harms all of the animals in the parks by poisoning and eradicating the thickets in which they den and nest and the food which they eat.

1. The Natural Areas Program has violated California Fish & Game Code and the Migratory Bird Treaty Act

The DEIR states that SNRAMP is consistent with all federal and state laws governing the protection of biological resources. One of those laws is California Fish & Game Code 1600-1616 regarding the protection of fish and wildlife within "bodies of water of any natural river, stream or lake." These codes obligate those who are engaged in any "streambed alteration" to apply for a permit and "to propose reasonable project changes to protect the resource." (DEIR, page 274)

Islais Creek in Glen Canyon Park is such a water body which is protected by this law. Accordingly, the Natural Areas Program applied to California Fish & Game for a Streambed Alteration Permit in preparation for their project which began in November 2011. **The Natural Areas Program made the following commitment to mitigate harm to wildlife in Glen Canyon Park in its Streambed Alteration Permit:**

"It is the policy of RPD's Natural Areas Program that **no new projects will begin during the breeding season (December to May)**. Follow up work in previously cleared areas may be done during the breeding season, however, because areas will have been cleared previously. Wildlife will not likely be using these areas for breeding. This protocol has been effective in reducing impacts to breeding wildlife."

The Natural Areas Program began to destroy the non-native vegetation in Glen Canyon Park in San Francisco in November 2011. In addition to destroying valuable habitat with chainsaws, they also sprayed herbicides. This destructive activity continued through winter and spring 2012 and cannot be dismissed as "follow-up work" on previously cleared areas. The San Francisco Forest Alliance (SFFA) protested this destructive project many times but it has continued unabated to as recently April 27, 2012, when they pruned trees and sprayed herbicides.

Earlier in April, SFFA learned from a public records request that this project violated a legal commitment to the California Department of Fish & Game. SFFA immediately brought this violation of NAP's commitment to the attention of the General Manager of the Recreation and Park Department. The head of the Natural Areas Program said that the violation was necessary because the grant funding for the project was about to expire. **To avoid losing the funding for the project, the birds and animals of Glen Canyon Park were subjected to this destructive project during their breeding and nesting season.**

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SFFA brought this violation to the attention of the California Department of Fish & Game. Their regulations commit them to enforce the terms of the Streambed Alteration Permit, including the mitigation of potential harm to wildlife. Violations of the terms of the permit are subject to "civil penalties" according to the regulations: "A person who violates this chapter is subject to a civil penalty of not more than twenty-five thousand dollars (\$25,000) for each violation."

One month after informing California Department of Fish & Game of this violation, nothing seems to be done about it. In fact, several weeks after sending this information to Fish & Game, another episode of destruction occurred in Glen Canyon Park on April 27, 2012.

As the breeding/nesting season is also the season during which migratory birds are occupying their nests and the federal Migratory Bird Treaty Act "...also applies to the removal of nests occupied by migratory birds during the breeding season," (DEIR, page 273) we assume this law was also violated.

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In other words, the legal commitments made by the Natural Areas Program to conduct the destructive phase of their project outside of the breeding and nesting season were not observed. Furthermore, no action was taken by California Fish & Game to stop this project when it was brought to their attention. The law is apparently ignored with impunity.

In addition to the violation of federal and state laws, the Natural Areas Program has also violated the commitments made in both the SNRAMP and the DEIR: "In compliance with the MBTA [Migratory Bird Treaty Act], the SFRPD would avoid harming or removing the nests of these species and any migratory bird species. Measure GR-4b (page 109) in the SNRAMP requires that vegetation management activities be conducted outside the breeding season (February 1 to August 31), unless these activities had already begun before the breeding season and had already removed nesting habitat or if a breeding bird survey was conducted prior to vegetation removal activities and had determined that no nesting birds were present." (DEIR, page 305)

The commitment to California Fish & Game in NAP's Streambed Alteration Permit and the commitment made in Measure GR-4B of SNRAMP are contradictory. These contradictions should be resolved by the final EIR: When is the breeding season? What evidence is there that a breeding bird survey was conducted prior to vegetation removal activities which took place continuously from November 2011 to April 27, 2012? Is the mitigation required by the Streambed Alteration Permit consistent with the caveats of Measure GR-4b?

2. The Natural Areas Program is violating the Endangered Species Act by using pesticides known to be harmful to butterflies on Twin Peaks

The Mission Blue butterfly is a federal endangered species which existed historically on Twin Peaks in San Francisco. San Francisco's Natural Areas Program has been trying to reintroduce the Mission Blue to Twin Peaks for several years, so far with limited success. This reintroduction effort is reported by the DEIR. (DEIR, page 285)

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Herbicides are being sprayed on Twin Peaks to control non-native vegetation. **Twin Peaks was sprayed with herbicides 16 times in 2010 and 19 times in 2011.**

A recently published study reports¹ that the reproductive success of the Behr's metalmark butterfly was significantly reduced (24-36%) by herbicides used to control non-native vegetation. Two of those pesticides are used on Twin Peaks, imazapyr and triclopyr. Triclopyr was used most often on Twin Peaks in 2010 and imazapyr in 2011.

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The study does not explain how this harm occurs. It observes that the three herbicides that were studied work in different ways. It therefore speculates that the harm to the butterfly larva may be from the inactive ingredients of the pesticides which they have in common, or that the harm comes to the larva from its host plant which is altered in some way by the herbicide application. Either theory is potentially applicable to the herbicides used on Twin Peaks and consequently harmful to the endangered Mission Blue.

The Endangered Species Act requires that the Natural Areas Program stop spraying these herbicides on Twin Peaks because they are known to be harmful to the reproductive success of butterflies. Unless further scientific study exonerates these herbicides, the law obligates us to prohibit their use where the endangered Mission Blue butterfly is known to exist, i.e., on Twin Peaks.

3. Claims that habitat for animals is improved by the eradication of non-native plants are unsupported by scientific evidence.

The DEIR states repeatedly throughout the document that habitat will be improved by the eradication of non-native plants and the presumed replacement by native plants. In fact this is offered as the basis for most claims in the DEIR that the "restoration" project will not harm the environment. For example, although the DEIR acknowledges that the environment may be harmed by the methods used to eradicate non-native plants, this harm is theoretically mitigated by the claim that the eventual development of native habitat will compensate for that harm. These claims are not supported by either the reality of restoration efforts in the past 15 years or by scientific evidence which does not substantiate a claim that native vegetation provides habitat for animals that is superior to non-native vegetation.

Although non-native vegetation has been removed repeatedly in many natural areas, the native plants that are planted in their place rarely persist for longer than a few months. These newly planted areas are quickly over run by non-native weeds. We will provide examples of such failed "restorations" in a subsequent section of this comment (Part V).

More importantly, neither SNRAMP nor the DEIR provide any scientific evidence to support the contention that native vegetation provides superior habitat to animals. In fact, all available scientific evidence contradicts this claim.

Because eucalyptus trees are one of the primary targets for eradication, we will focus on the specific claim that the eucalyptus forest is a "biological desert." We are frequently told that "nothing grows" under the eucalypts and that they are not providing food or habitat to insects, birds, and other animals.

Professor Dov Sax (Brown University) tested these claims while a student at UC Berkeley. **He studied the eucalyptus forest in Berkeley, California, and compared it to native oak-bay woodland in the same location. He found little difference in the species frequency and diversity in these two types of forest.**

He studied six forests of about 1 hectare each, three of eucalypts and three of native oaks and bays in Berkeley, California. The sites were not contiguous, but were selected so that they were of similar elevation, slope, slope orientation, and type of adjacent vegetation. He conducted inventories of species in spring and autumn. He counted the number of:

- Species of plants in the understory
- Species of invertebrates (insects) in samples of equal size and depth of the leaf litter
- Species of amphibians
- Species of birds
- Species of rodents

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He reported his findings in Global Ecology and Biogeographyⁱⁱ:

"Species richness was nearly identical for understory plants, leaf-litter invertebrates, amphibians and birds; only rodents had significantly fewer species in eucalypt sites. Species diversity patterns...were qualitatively identical to those for species richness, except for leaf-litter invertebrates, which were significantly more diverse in eucalypt sites during the spring."

Professor Sax also surveyed the literature comparing biodiversity in native vs non-native forest in his article. He reports similar findings for comparisons between non-native forests and local native forests all over the world:

- In Spain, species of invertebrates found in the leaf-litter of eucalyptus plantations were found to be similar to those found in native forests, while species richness of understory plants was found to be greater in the native forests.
- In Ethiopia the richness of understory species was found to be as great in eucalyptus plantations as in the native forest.
- In the Mexican state of Michoacán, species richness and abundance of birds were found to be similar in eucalyptus and native forests.
- In Australia species richness of mammals and of soil microarthropods were found to be similar in native forests and in non-native forests of pine.

The only caveat to these general findings is that fewer species were found in **new** plantations of non-natives less than 5 years old. This helps to illustrate a general principle that is often ignored by native plant advocates. That is, that **nature and its inhabitants are capable of changing and adapting to changed conditions. In the case of non-native forests in the San Francisco Bay Area, they have existed here for over 100 years. The plants and animals in our forests have "learned" to live in them long ago.**

The scientific literature informs us that wildlife does not necessarily benefit from native plant restorations and sometimes they are harmed by them. The assumption that native animals are dependent upon native plants underestimates the ability of animals to adapt to changing conditions.

Art Shapiro (UC Davis) has been studying California butterflies for over 35 years. His own observations as well as the work of other scientists have informed him that **"...the extensive adoption of introduced host plants has clearly been beneficial for a significant segment of the California butterfly fauna, including most of the familiar species of urban, suburban and agricultural environments. Some of these species are now almost completely dependent on exotics and would disappear were weed control more effective than it currently is."**ⁱⁱⁱ

He explains that this is particularly true on the coast of California because this is where the highest concentration of introduced species of plants is naturalized and the butterfly population is less diverse because of the cool, foggy climate. There are apparently few non-native plants in the desert and alpine regions of California and so butterflies in those regions have not had the opportunity or need to adapt to new plants.

Professor Shapiro also speculates in this study that **other insects have adapted to non-native plants as well:** "Introduced hosts, having a broader geographic range than native hosts, may permit the expansion of the insect population geographically."

Birds have also adapted to non-native plants and trees. Researchers at UC Davis surveyed over 1,000 ornithologists in 4 states, including California, about their observations of native birds and non-native plants. Responses from 173 ornithologists reported 1,143 "interactions" of birds with introduced plants considered invasive. Forty-seven percent

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(47%) of those interactions were birds eating the fruit or seeds of non-native plants and trees considered invasive. Other interactions were nesting, perching, gleaning [eating insects], etc.^{iv}

Interactions were frequently reported in non-native blackberry, which is found in most parks in San Francisco. It is one of the most productive food sources for birds in San Francisco. Unfortunately, it is being eradicated by the Natural Areas Program along with a long list of non-native shrubs which provide food and cover, such as cotoneaster, fennel, etc. The loss of food and cover has a drastically negative impact on the animals that live in our parks.

The non-native blackberry also provides cover for wildlife. It is an impenetrable bramble both physically and visually. Birds and small mammals hide and make nests and dens in these thickets. Coyotes are resident in San Francisco. The thick undergrowth which has been removed in some parks by the Natural Areas Program now allows unleashed dogs to pursue them in areas where they were protected before. If the safe havens of urban wildlife are destroyed, the animals may seek shelter elsewhere, a move that may be dangerous for them. When animals move into residential neighborhoods they are considered a nuisance and are often killed.

Native plant restorations also require the use of herbicides to eradicate non-native trees and plants. Herbicides are being sprayed in the blackberries and other berry-producing non-native plants which are a major food source for wildlife. **One study performed by the US Forest Service for the EPA reported that the use of Garlon significantly reduced the reproductive success of birds.^v Garlon is also highly toxic to aquatic life.**

Finally, we provide a current and local example of the scientific evidence that native plants do not provide habitat that is superior to that provided by non-native plants. The California Academy of Sciences finds that several years after planting its roof with native plants, it is now dominated by non-native species of plants in the two quadrants that are not being weeded, replanted and reseeded with natives. **Their monitoring project recently reported that there were an equal number of insect species found in the quadrants dominated by native plants and those dominated by non-native plants.** Where equal numbers of insects are found, we can expect to find equal numbers of birds and other animals for which insects are food.

Conclusion

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(Cont.)

The final EIR is not in a position to reassure the public that the implementation of SNRAMP will not harm wildlife because the Natural Areas Program has violated the laws that theoretically protect wildlife.

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The final EIR must prohibit the use of pesticides known to be harmful to butterflies on Twin Peaks where the endangered Mission Blue butterfly has been reintroduced by the Natural Areas Program.

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(Cont.)

The final EIR must provide scientific evidence that native plants provide superior habitat for wildlife. If it is unable to provide such evidence, these claims must be removed from the final EIR. Without such reassurances, the final EIR must conclude that the eradication of non-native plants will have a significant negative impact on the biological resources in San Francisco's natural areas.

ⁱ John D. Stark, Xue Dong Chen, Catherina S. Johnson, "Effects of herbicides on Behr's metalmark butterfly, a surrogate species for the endangered butterfly, Lange's metalmark," Elsevier, 1/11/12.

ⁱⁱ Dov Sax, "Equal diversity in disparate species assemblages: a comparison of native and exotic woodlands in California," Global Ecology and Biogeography, 11, 49-52, 2002.

ⁱⁱⁱ SD Graves and AM Shapiro, "Exotics as host plants of the California butterfly fauna," Biological Conservation, 110 (2003) 413-433

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^{iv} CE Aslan and E Rejmanek, "Avian use of introduced plants: Ornithologist records illustrate interspecific associations and research needs," *Ecological Applications*, 20(4), 2010, 1005-1020

^v Marin Municipal Water District, *Herbicide Risk Assessment*, page 4-24.

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**Public Comment of the San Francisco Forest Alliance
Draft Environmental Impact Report for the Natural Resource Areas Management Plan
Part IV: Restrictions recreational access**

The Significant Natural Resource Areas Management Plan (SNRAMP), which is evaluated by the Draft Environmental Impact Report (DEIR), announces these restrictions on recreational access in the natural areas:

- SNRAMP "...calls for closing 54,411 feet (10.31 miles) of social trails and creating 5,897 feet (1.1 miles) of new trails, resulting in a net decrease of 48,514 feet (9.2 miles) or 23% of trails in natural areas." (DEIR, page 256)
- SNRAMP restricts all public use in the natural areas to the trails that will remain: "Public use in all Natural Areas, unless otherwise specified should encourage on-trail use...interpretative and park signs should be installed ...to 'Please Stay on the Trail.' If off-trail use continues...permanent fencing shall be considered..." (SNRAMP, page 5-14). This policy is not mentioned in the DEIR.
- The DEIR also announces plans to close 19.3 acres (20.3%) of the legal off-leash space in the natural areas which is 16.4% of all legal off-leash space available in all city parkland. (DEIR, page 257)

Despite these plans to severely restrict all forms of recreation in the natural areas, which are 25% of all city managed parkland in San Francisco, the DEIR concludes that the impact on recreation will be "less than significant." The DEIR's analysis of impacts on recreation was inadequate for the following reasons:

1. The DEIR did not adequately consider the impacts on recreation and visitor experience caused by the closure of 10.31 miles of trails, including many social trails.
2. The DEIR did not consider negative impacts on recreation and visitor experience from the Natural Areas Program's extensive use of fences to force people to stay on trails, nor did it consider impacts from the removal of benches in natural areas.
3. The DEIR did not consider the negative impact on recreation for park neighbors and users because NAP controls over 50% of the park in 27 out of 31 parks with natural areas (only four parks with natural areas have less than 50% of their total area controlled by NAP).
4. The DEIR did not adequately consider the negative impact on recreation from the intentional planting of threatened or endangered plant species and reintroduction of legally protected animal species in natural areas where they do not currently exist.
5. The DEIR did not adequately address the impact on recreation of the closure of off-leash Dog Play Areas, especially the potential closures of up to 80% of all legal off-leash areas on city parkland which the DEIR informs us could be the result of "monitoring" of the remaining off-leash areas.
6. The DEIR did not adequately address the impact on recreation, aesthetics, and visitor experience of poor maintenance in natural areas.

1. Trail Closures

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As acknowledged in the DEIR, a 2004 Recreation Assessment conducted for the Recreation and Park Department reported that the number one recreational facility need was more trails. Of the residents surveyed, 67% reported participating in walking or running, the highest percentage for any of the 26 activities listed in the Assessment. People want more trails, not less.

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According to RPD General Manager Phil Ginsburg, the majority of trails in San Francisco city parks are located in the natural areas controlled by NAP (private conversation, June 1, 2012; he said this when asked to explain why the "trail restoration" part of the 2008 Clean and Safe Neighborhood Parks Bond was restricted to trails in natural areas). Thus, the SNRAMP's proposed closure of 23% of the total length of trails in natural areas marks a significant decrease in the length of trails available to the public systemwide, not just in the natural areas. There is simply not enough trail mileage in non-NAP parks to adequately replace the mileage lost in the natural areas. Thus the trail closures will have a more significant negative impact on the majority of San Franciscans who want more trails on which to walk or run. This aspect of the trail closures was not mentioned in the DEIR.

By closing off the areas currently accessed by the trails that will be closed, the SNRAMP will reduce the variety of experiences park users can have (fewer different areas to see). With less mileage available to walk, the closures will also discourage people from taking longer walks. Neither of these impacts was considered in the DEIR.

Many, if not most, of the trails scheduled for closure are "social trails," trails created by park users, not by park staff. There is usually a reason people create social trails; they prefer to take a more direct, faster, or more scenic path from Point A to Point B than the path RPD staff have told them they should take. Frequent visitors are the ones who create social trails by walking off an official trail time and time again. People new to a park will likely stay on official trails; they don't know where else to go. The closure of social trails will therefore have a greater impact on people who walk frequently in the parks, degrading their experience of the park by forcing them to walk in places they clearly would rather not.

When the University of California at Santa Cruz opened in the 1960s, administrators paved few paths between the colleges. They chose to wait to see what paths the students "naturally" created on their own to get from one place to another, and then paved the social trails that resulted. The social trails became the official trails. NAP has taken the opposite approach, deciding where people will be allowed to walk with little, if any, public input. And when the public has expressed a desire for something different than what NAP wants (by voting with their feet and creating a social trail), the response is to destroy the social trail. NAP is working at cross-purposes to the majority of San Franciscans who want more trails, and who try to show NAP where they want those trails to be when they create social trails.

Social trails also spring up when people want to enter or leave a park at a location where there is no "official" trail that will allow them to do so. For example, over the years, people created a social trail at the northwestern corner of Grandview Park. The only "official" park access comes from trails on the eastern and southern sides of the park. To get to the official trails, people living on the north and western sides of the park are forced to walk in the street that surrounds the park, an option they clearly didn't like since they created a trail to the top of Grandview that began in the park's northwest corner. The recent closure of the social trail at Grandview by NAP has made it harder for the people who live north and west of the park to access it. The DEIR did not address the loss of accessibility to parks by the closures of some social trails.

Erosion can be a problem with social trails, but the response should be to mitigate erosion where it occurs, not to close the trail. The DEIR did not consider mitigations to these erosion problems other than closure.

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2. Fences and Benches

The DEIR does not address the impacts on recreation and visitor experience of being restricted to the trails in the natural areas. Being restricted to trails prevents many different types of recreation. Visitors can't spread a blanket on the ground and have a picnic or sunbathe while reading a book. Families can't play ball or Frisbee, fly a kite or a model airplane on a trail. Being confined to a trail essentially prohibits many other forms of recreation. Signs have been erected in the natural areas to inform the public that they are confined to the trails. The DEIR makes no mention of this policy or the restrictions it imposes on the recreational preferences of park visitors.



"Stay on Designated Trail" Billy Goat Hill

Fences have been erected by NAP alongside trails to enforce this restriction. With fences in place on either side of a trail, a child is physically prevented from exploring plants and bugs on the ground just off of the trail, or following a butterfly or moving to see the bird she can hear calling. Fences, no matter how attractive they are, create a "look, Don't Touch" museum-like feel to the park. That is not what most people want in their neighborhood parks.

Where trails have recently been "restored" in natural areas, NAP has erected fences on both sides of the trail, to force people to stay on the trails. These recently completed projects are a preview of the fences that the public can expect to be installed in all the natural areas as SNRAMP is implemented over its 20-year lifespan.



Grandview, May 2012

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Corona Heights, May 2012

These are not temporary fences. They will remain in place to keep people from straying off the trail for years to come. Putting a fence on both sides of a trail creates a "cattle chute" feeling that many people find unappealing. Their park experience is seriously degraded by the presence of these fences. The DEIR does not address the issue of impacts of permanent or semi-permanent fences on recreation, nor does it address the impact on visitor experience of creating "cattle chute" trails in neighborhood parks.

When all recreational users are confirmed to a trail, it creates unnecessary conflicts between different user groups. When joggers, dogs being walked on 6' leashes (as allowed by law), bicycles, birders seeking quiet, are all confirmed to the small space of a fenced trail, conflicts are inevitable. These conflicts are mitigated, if not avoided altogether, by giving people the option of stepping off the trail to accommodate other park visitors. **Of all the negative impacts of the Natural Areas Program, perhaps the most devastating has been the increased conflicts it has caused in our parks. Park visitors who have co-existed in peace for generations are now pointing fingers at one another, blaming one another for the loss of their recreational liberty.**

NAP has a history of removing benches from areas under its control. For example, a bench on an overlook at Mt. Davidson, one of only two benches in the park, was recently removed by NAP. There was nothing wrong with this bench. It was apparently removed because it was perceived by NAP staff to be detrimental to the native plants that grow in that area. There is now no place to sit (except on the ground) to either rest or reflect while looking at the view. This is a particular hardship for seniors and others with more limited mobility, who now have no place to sit after a strenuous uphill hike. Despite park neighbors' and users' pleas to replace the bench, NAP has so far refused to do so. The lack of benches or places for people to rest without having to sit on the ground impacts all recreational users of the parks, even those who only want to walk on trails.

The final EIR must acknowledge the SNRAMP policy to confine all recreational access in the natural areas to fenced trails. This restriction has a significant impact on recreation in the parks of San Francisco and it should be recognized as such by the final EIR.

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3. NAP's Control of Entire Parks

In over half of the parks with natural areas (17 of 31 listed in Table 5 of the DEIR), NAP controls the entire park. Entire parks have become essentially single-use parks – natural areas only. In an additional 10 parks, NAP controls over 50% of the park. In only four parks does NAP control less than half of the park.

For those parks in which NAP controls the entire park, there are no recreational uses allowed in the entire park other than walking on a trail (Bernal Hill is the one exception, with off-leash dog walking allowed in the nearly half of the park that is designated as MA-3). Parents hoping to play catch with their child must find another park in which to do so. People wanting to sit on a blanket in the sun must go somewhere else. When you add in the parks with more than half of their land controlled by NAP, 87.5% of parks with natural areas in them will have significant restrictions on access and recreation. The final EIR must consider this impact on recreation and access.

Within all the natural areas, more than half of the land (57%) is designated as MA-1 or MA-2. These are the management zones with the most severe restrictions on recreation. In 7 parks, all of the land in the natural area is designated as MA-1 or MA-2. These parks will see even more significant impacts on access and recreation than parks with at least some of their land designated as MA-3. Recreation restrictions from different management zones, and how much of a park is made up of each zone, must be considered in the final EIR.

In some cases, the parks completely controlled by NAP do not have non-NAP parks close by. Thus people who want a non-NAP park experience (for example, to play catch with their children, friends or pets) will be forced to go to another park outside of their neighborhood. This will force many into their cars to drive to a non-NAP park. This increase in automobile usage and its attendant increases in pollution and global warming effects are not addressed in the DEIR.

4. Planting and/or Reintroducing Threatened or Endangered Species

In the SNRAMP, NAP expresses its intent to plant threatened or endangered species throughout the natural areas, including many places where they are not currently found. The mere presence of these species triggers a number of additional protections and access restrictions required by the federal Endangered Species Act and similar state and local laws. The intentional planting of legally protected species where they are not currently found makes restrictions on recreational access (indeed all access) a *fait accompli*. Once the plant is in the ground or the animal is known to exist, it MUST be protected and recreational access MUST be restricted.

We have two specific examples of the consequences of reintroducing endangered species to our parks. In the case of Sharp Park, two endangered species of animal are known to exist. To our knowledge, these animals were not reintroduced by humans. The DEIR proposes to reconfigure the golf course to accommodate those legally protected species. The scale of that project is described in detail by the DEIR. We can't imagine how much this project will cost to implement. However, despite the scale of this monumental effort, San Francisco is being sued by organizations which do not believe that the proposed accommodations are adequate and therefore violate the Endangered Species Act. These organizations demand that the golf course be closed entirely and that all recreational access be confined to "viewing zones" behind fences. Essentially, they want the entire 411 acre park turned over to the two endangered species.

The effort of the Natural Areas Program to reintroduce the endangered Mission Blue butterfly to Twin Peaks is a more clear-cut example of the potential for the implementation of SNRAMP to eliminate recreational use of San Francisco's parks, because the butterfly did not exist there prior to the efforts of the Natural Areas Program to reintroduce it. In

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other words, the reintroduction was a discretionary act. The Natural Areas Program is willfully subjecting Twin Peaks to the potential to be closed to the public. The federal recovery plan for the Mission Blue previews these restrictions:

“Recreational impacts pose a substantial threat to mission blue butterfly habitat...One of the contributing factors to the apparent extirpation of this butterfly on Twin Peaks is heavy recreational use by off-trail hikers, and motor-bike activity all of which are prohibited.”¹

SNRAMP informs us that the Natural Areas Program intends to reintroduce the endangered Mission Blue butterfly in McLaren Park and Bayview Hill. It is, however, silent about what recreational access restrictions may be required to support the population of a legally protected species.

In its section on Recreation (p. 252), the DEIR says that the Notice of Preparation Scoping process identified several concerns about recreation, including: “Effects of the introduction of endangered/threatened species on recreational opportunities, public access, and the administration of local public lands.” Despite this acknowledgment, there is no discussion of impacts on recreation caused by intentional planting of sensitive species where they are not currently found.

The final EIR must acknowledge that the Natural Areas Program intends to reintroduce legally protected species of plants and animals to the Natural Areas. It must inform the public of what recreational access restrictions will be required to accommodate those species. When the loss of recreational access is anticipated, the final EIR must mitigate for those impacts by providing commensurate recreational opportunities in San Francisco.

5. Dog Play Area (DPA) Closures

The DEIR does not adequately consider impacts on off-leash recreation from the SNRAMP. The DEIR addresses only the impacts on remaining DPAs, and on recreation, of the immediate closure of 16.4% of the total legal off-leash space in city parks once the SNRAMP goes into effect. However, the DEIR concludes that impacts of these closures on remaining DPAs, recreation, people driving to other DPAs, etc., will be minimal.

The SNRAMP makes clear that NAP will monitor DPAs in four parks – McLaren, Buena Vista, Bernal Hill, and the Golden Gate Park Oak Woodlands – where DPAs are located either within or adjacent to natural areas. These DPAs, combined with the one scheduled for closure at Lake Merced, constitute roughly 80% of the legal off-leash space in all city parks. SNRAMP also makes clear that if NAP claims the monitoring shows impacts on these natural areas from the dogs, the DPAs will be closed.

In other words, initial closures of dog play areas will be 16.4% of all dog play areas in San Francisco, but SNRAMP announces the potential for 80% of all dog play areas to be closed in the future. Since no evidence is provided by the DEIR that any damage has been done by dogs in the dog play areas that are being closed immediately, no evidence is likely to be provided to close most of the dog play area that would remain after the immediate closures.

In fact, in the one dog play area which will be closed entirely and immediately, both SNRAMP and the DEIR say that use of this area by visitors with dogs is minimal: “...the DPA at Lake Merced is not heavily used...” (DEIR, page 258) One wonders what the justification is for closing this DPA if it is not heavily used and no evidence is available that damage has been done by dogs.

¹ http://ecos.fws.gov/docs/five_year_review/doc3216.pdf

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The DEIR states that it cannot analyze the impacts of possible GGNRA closures because they have yet to be finalized. However, we know the amount of off-leash areas in the GGNRA proposed for closure in January 2011: 90% of existing off-leash space on GGNRA lands have been proposed for closure. The final EIR should analyze the cumulative impacts of the maximum amount of closure proposed by both SNRAMP and the GGNRA. We saw on "Tsunami Friday" what those impacts could be. The GGNRA closed both Fort Funston and Ocean Beach to all visitors on the morning of Friday, March 11, 2011 because of concerns that a tsunami triggered by a major earthquake in Japan would strike the coast. On Tsunami Friday, a Recreation and Park Department staff member counted over 200 dogs at once in the Pine Lake DPA at 10 am, ten times more dogs than on a normal weekday (usually about 20 dogs at any one time), and more than three times the maximum number of dogs normally seen on busy weekends (about 60 dogs). This example graphically illustrates the potential impact on remaining DPAs of significant closures of off-leash space. Forcing so many more dogs into remaining DPAs day after day will undoubtedly lead to serious degradation of those remaining DPAs thereby creating the conditions that would justify closure in the future.

Without providing any analysis, the DEIR concludes the cumulative impacts of closure of off-leash areas by the GGNRA and those proposed by SNRAMP are "significant and unavoidable." So, in this rare instance in which the DEIR acknowledges significant impact on the environment and on recreational opportunities in San Francisco, it gives itself a free pass: "It's unavoidable." We beg to differ. The final EIR has options that must be considered. The obvious and responsible thing to do is to NOT close any dog play area if there is no evidence that dogs are harming those areas.

The DEIR repeatedly justifies the exclusion of off-leash recreation because it says dogs have a significant negative impact on plants and wildlife. Yet it offers no evidence to support the claims of impacts. The DEIR repeatedly says dogs MAY be impacting protected plant species or wildlife (ppgs, 298, 305, 306, 472, 502, 517), yet offers no evidence these impacts are actually occurring or ever have occurred. After each of these claims, the DEIR goes on to say: Dogs MAY continue to impact plants or wildlife. If there is no proof of an impact, then that impact cannot "continue." **EIRs must be based on observed, documented impacts, not speculation about things that "may" happen at some point in the future. The final EIR must alter its analysis to address this and base any restrictions on recreation involving dogs on actual observed impacts.**

6. Poor Maintenance

The 2012 work plans for the Natural Areas Program (see Attachment IV-A, obtained by public records request) help us to understand why the natural areas are such a mess. The work plans inform us that NAP and its volunteers and contractors plan to spend a total of 358.5 days taking care of 1,075 acres of natural areas in 2012. Each acre of natural area will therefore receive one-third of one day of maintenance for the entire year. Some natural areas have not been scheduled for any maintenance and several as few as one day for the entire year.

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There are countless stories of volunteers who spent long hours planting in NAP areas, only to see absolutely no maintenance performed once the plants were in the ground. Not surprisingly, many of these plants die, creating unsightly vistas of dead or dying plants. People are much less likely to want to walk in natural areas that are poorly maintained, a negative impact on recreation that is not addressed in the DEIR.

Poor maintenance is important because NAP is exempt from the Maintenance Standards mandated by Proposition C passed by San Francisco voters in 2003. Prop C required the Recreation and Park Department, with help from the Controller's Office, park advocates and the general public, to develop maintenance standards for parks. The standards define the desired conditions of park features such as lawns, trees, and trails, and are used to assess and evaluate conditions in San Francisco parks each year. In the San Francisco Park Maintenance Standards Manual (August 2006), there is a single maintenance standard for open space – cleanliness, defined as: "From a 10 feet distance (i.e., from the

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nearest path), open space is free of litter and debris." The manual goes on to say that the standard is met if no more than 15 pieces of litter are visible in a 50' by 50' area or along a 200' line, and that the standard is not met if needles, condoms, broken glass, and/or feces are present.

Certainly people in natural areas, including those walking on trails, have a right to expect the natural areas to meet such a simple cleanliness standard. However, the Manual goes on to say: **"Open space-natural areas are not included in this standards manual, and therefore, are not inspected."** The DEIR should consider the impact on aesthetics and recreation of the woeful lack of maintenance in natural areas.

The final EIR should also consider the mitigation of scaling NAP back to a few areas that it can adequately maintain with its existing staff and budget, compared to the current plan to spread maintenance hours so thin because they are trying to cover too many natural areas. One of many reasons why the Natural Areas Program is controversial is that it is too big. It has claimed hundreds of acres in which there were no native plants whatsoever. It has bit off more than it can chew. Much of what is now on its plate should be taken back and returned to its "natural state," i.e., without pesticides, without fences, without moonscapes created by eradicating existing vegetation.

Conclusion

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The final Environmental Impact Report for the SNRAMP must:

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- **Analyze the impacts on recreation of confining all recreation to trails, as well as the closure of trails in natural areas**
- **Analyze the impact of restricting all recreational access to trails enforced by fences on recreation and aesthetics, especially erecting fences on both sides of trails, as well as impacts from the removal of benches in natural areas**
- **Analyze impacts on recreation and access resulting from the designation of entire parks as natural areas with consequent impacts on recreation and aesthetics.**
- **Analyze the impacts on recreation and access resulting from the intentional planting or reintroduction of legally protected species of plants and animals in natural areas where they do not currently exist**
- **Analyze the maximum possible closures of all DPAs in natural areas (80%), not just the minimum possible (16.4%), and provide evidence of impacts claimed to be caused by dogs**
- **Analyze impacts on aesthetics and recreation of poor maintenance of natural areas.**

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If this information is provided in the final Environmental Impact Report, it will undoubtedly conclude that the impact of SNRAMP on recreation is significant and requires mitigation. The obvious mitigation is to decrease the size of the natural areas to a size that can be maintained adequately and which does not restrict recreational opportunities.

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Public Comment of the San Francisco Forest Alliance
 Draft Environmental Impact Report for the Natural Resource Areas Management Plan
 Part V: Support for the Maintenance Alternative

The Draft Environmental Impact Report (DEIR) identifies the Maintenance Alternative as the Environmentally Superior Alternative.¹ This is consistent with CEQA law which requires that the alternative that will have the least negative impact on the environment be identified as the Environmentally Superior Alternative.

Our support for the Maintenance Alternative is based on the fact that it is the least destructive of the alternatives presented by the DEIR:

- The Maintenance Alternative will destroy the least number of trees and existing vegetation
- The Maintenance Alternative will require the least amount of pesticide
- The Maintenance Alternative will require the least restrictions on recreational access
- In addition to being the Environmentally Superior Alternative, the Maintenance Alternative is also the only viable and sustainable alternative because:
 - The Maintenance Alternative will not require that native plants which are no longer adapted to present conditions be planted where they will not grow
 - The Maintenance Alternative will not require that the City of San Francisco substantially increase the budget of the Natural Areas Program so that native plant gardens can be expanded

1. The Maintenance Alternative will have less negative impact on the environment

The Natural Areas Program (NAP) has destroyed hundreds of trees in the “natural areas” in the past 15 years. The destruction of these trees has given NAP the opportunity to demonstrate that removing trees is beneficial to native plants. In fact, there is little evidence that the destruction of trees has resulted in successful native plant gardens.

The Pine Lake “natural area” is an example of the destruction of trees which did not result in a successful native plant garden. In 2004, about 25 trees were destroyed at the western end of Pine Lake. This destruction is documented by the Hort Science report of December 2011 (“Stern Grove-Pine Lake Park, Parkside Square tree risk assessment”). This report was written as an update on Hort Science’s comprehensive assessment of all trees in Stern Grove-Pine Lake in 2003, in preparation for finally removing the hundreds of trees that had been evaluated as hazardous 8 years before. Here is what Hort Science found at the “West end of the park, near Wawona and 33rd Ave:” **“This area had a number of trees removed by the Natural Areas Program.”**

The area in which the trees were destroyed was then planted with native plants and surrounded by the limbs of the trees that were destroyed. This is what that garden looked like in May 2008, four years later:

¹ This assumes that page 2 is corrected to be consistent with pages 525-526, as the Planning Department has said in writing that it will be corrected in the final EIR.

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West end of Pine Lake, May 2008

And this is what that area looks like now:



West end of Pine Lake, July 2011

Little remains from that effort. This is not an isolated example of the results of 15 years of attempting to restore native plants in places where they have not existed for over 100 years. In addition to the 25 healthy trees that were destroyed at the western end of Pine Lake, 132 trees judged as hazardous were destroyed around the lake in 2006 (these tree removals are documented in SNRAMP). The southern and northern shores of Pine Lake have been planted repeatedly. These areas are now dominated by foxtails and non-native nasturtiums which are thriving, despite being eradicated repeatedly.

Other parks have had similar experiences in their "natural areas." Sometimes toxic herbicides are used in the attempts to eradicate the non-native plants. Here is a picture of a field of oxalis and mustard in Glen Canyon Park that has been

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sprayed with toxic Garlon numerous times. There is no evidence that these non-native plants have been defeated by this chemical warfare.



Oxalis in Glen Canyon Park, February 2011

According to "UC [Davis] IPM Online"², Garlon only poisons the visible part of the plant; it doesn't kill the root of the plant (in this case, the "bulbil"). So, the plant grows back the next year and is poisoned again. Between March and October 2010, the Natural Areas Program and its contractors (Shelterbelt Builders) sprayed Glen Canyon with herbicides 10 times. If this futile effort continues, it will be sprayed again every year, for as long as the public is willing to tolerate this poisoning of its public parks. There is a creek at the bottom of this canyon that is probably being poisoned as well. According to the federally mandated Material Safety Data Sheet for Garlon, it is "highly toxic" to aquatic life. Alongside the creek is a day camp that is attended by children year around. Do their parents realize that this toxic chemical is being sprayed repeatedly in proximity of their children?

More fortunate "natural areas" have essentially been abandoned by the Natural Areas Program. Tank Hill has not been gardened by the NAP staff for several years. It has been spared the spraying of herbicides. However, it is visited by an unsupervised volunteer who hacks at the trees that remain. In other words, so many acres of parkland have been designated as "natural areas" that the staff is unable to garden them and is unable to supervise the volunteers who are free to do whatever they want in them, including mutilate trees.

2. The conditions that supported native plants in San Francisco have changed

One of many questions that was asked during the public comment period for the Initial Study was: is it still possible to sustain native plant gardens in San Francisco, given the radical changes in underlying conditions, e.g., higher levels of Carbon Dioxide, higher temperatures resulting from climate change and urban heat effect, changes in soil such as increased nitrogen levels and as a result of non-native vegetation, etc.?

This is one of many questions that were raised at the time of the Initial Study that are neither acknowledged nor answered by the DEIR. We will therefore ask and answer this question because it is our last opportunity to do so. The evidence that the ranges of native plants and animals have changed is overwhelming. We should not be surprised that the Natural Areas Program has had little success in achieving their goals after 15 years of effort. NAP and its supporters

² <http://www.ipm.ucdavis.edu/PMG/PESTNOTES/pn7444.html>

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would like the public and the City's policy makers to believe that its lack of success is because they are not adequately funded.

Even if the City had the resources to substantially increase the staff of the Natural Areas Program—and chose to use them for that purpose—we would not see a substantially different outcome from their efforts. To demonstrate the futility of this effort, we turn to the living roof on the California Academy of Sciences.

When the California Academy of Sciences reopened in Golden Gate Park in August 2008, its "living roof" was considered its most unique feature. Thirty species of native plants were candidates for planting on the roof. They were planted in test plots with conditions similar to the planned roof and monitored closely. Only nine species of native plants were selected for planting on the roof because they were the only plants that were capable of self-sowing from one season to the next, implying that they were "sustainable." A living demonstration of "sustainability" was said to be the purpose of the living roof.³

So what have we learned from the living roof about the sustainability of native plants in San Francisco? Two of three of the predominant species on the roof after 2-1/2 years were native. The third—moss—is a "cosmopolitan" species that occurs everywhere. It is not considered native or non-native. It was not planted on the roof and therefore should be considered "invasive" in this context. The Academy's monitoring project has divided the roof into four quadrants. By February 2011, non-natives outnumbered natives in two of the quadrants. Although natives outnumbered non-natives in the other two quadrants which are actively gardened, non-natives were also growing in these quadrants.⁴

The consultant hired by the Academy to plan the roof garden, Rana Nursery, advised the Academy to walk the streets of San Francisco and identify the plants growing from the cracks in the sidewalks. These are the plants he advised the academy to plant because these are the plants that are adapted to current conditions in the city. The academy rejected this advice because they were committed to planting exclusively natives on the roof.

The designer also advised the academy not to irrigate the roof, because the point of the roof is that it is a demonstration of sustainability. Again, the academy refused because they knew that without irrigation most of the native plants would be brown during the dry season, roughly half the year. (In fact, it is not clear that the plants would even survive without irrigation.) They wanted the public to believe that the plants that are native to San Francisco are beautiful year around.

There is a lesson here for anyone who is willing to learn from it. The living roof is not natural because it is irrigated and intensively gardened (e.g., weeded, fertilized, replanted, reseeded, etc.⁵), yet non-natives not only found their way there on their own, but were dominating it within only 2-1/2 years. Native plants are not sustainable in San Francisco without intensive gardening effort. The living roof on the Academy is a tiny fraction of the acres that have been designated as "natural areas." The Academy is one building in Golden Gate Park. All of Golden Gate Park is about the same acreage as all of the 1,100 acres of "natural areas."

Peter Del Tredici has been telling us this for several years. He is a Senior Research Scientist at the Arnold Arboretum at Harvard University and a Lecturer in the Department of Landscape Architecture at the Harvard Graduate School of Design.

³ http://www.calacademy.org/academy/building/the_living_roof/

⁴ <http://www.calacademy.org/pdfs/living-roof-project-results.pdf>

⁵ "High Maintenance Superstar," Linda McIntyre, *Landscape Architecture*, August 2009.

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In a recent publication, he advises the managers of public lands in urban areas to abandon their fantasy that native plants are sustainable in urban settings:

"The notion that self-sustaining, historically accurate plant associations can be restored to urban areas is an idea with little credibility in light of the facts that 1) the density of the human populations and the infrastructure necessary to support it have led to the removal of the original vegetation, 2) the abiotic growing conditions of urban areas are completely different from what they were originally; and 3) the large number of non-native species that have naturalized in cities provide intense competition for the native species that grew there prior to urbanization."⁶

Sure, he says, we can grow native plants, but they require at least the same amount of effort as growing any other plant and are therefore just another form of gardening: "Certainly people can plant native species in the city, but few of them will thrive unless they are provided with the appropriate soil and are maintained to the same level as other intentionally cultivated plants."

He concludes that native plant advocates are making a "cultural value judgment:"

"...people are looking at the plant through the subjective lens of a cultural value judgment which places a higher value on the nativity of a given plant than on its ecological function. While this privileging of nativity may be appropriate and necessary for preserving large wilderness areas or rare native species it seems at odds with the realities of urban systems, where social and ecological functionality typically take priority over the restoration of historic ecosystems."

Conclusion

Although the Maintenance Alternative is the least destructive of the alternatives considered by the DEIR, the closure of the Natural Areas Program would be less destructive than the Maintenance Alternative

- **The Natural Areas Program has had 15 years to demonstrate that destroying trees and spraying our parks with herbicides will enable them to recreate sustainable native plant gardens. They have failed.**
- **NAP has little to show for the destruction of hundreds of healthy trees, the use of gallons of toxic herbicides, and the investment of millions of dollars of taxpayers' money.**
- **At a time of extreme economic sacrifice, it is unseemly to suggest that further destruction of trees, poisons spread and money squandered would be worthwhile.**
- **Furthermore, greater sacrifice of money, trees, public safety, and recreational access will not result in sustainable native plant gardens.**

The environmental impacts of the Proposed Project, No Project, and Maximum Restoration Alternatives are significant and the final EIR must judge them as such in these categories: Aesthetics, Wind and Shadow, Recreation, Biological Resources, Hydrology and Water Quality, Hazards and Hazardous Materials, and Air Quality.

⁶ "Spontaneous Urban Vegetation: Reflections of Change in a Globalized World," Nature and Culture. Winter 2010, 209-315.

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Public Comment of San Francisco Forest Alliance
Draft Environmental Impact Report for Natural Resource Areas Management Plan
Part VI: Flawed Public Review and Comment Process

The public review and comment process for the Draft Environmental Impact Report (DEIR) for the Significant Natural Areas Resources Management Plan (SNRAMP) was severely compromised by:

1. A major mistake in the identification of the "Environmentally Superior Alternative" and the refusal to correct that mistake during the public process
2. The last minute rescheduling of the public hearing by the Planning Commission which prevented many concerned citizens from commenting at that hearing
3. The refusal to inform the public of the extension of the deadline to October 31, 2011
4. The refusal to inform the public of the reopening of the public comment period to June 11, 2012

These errors and policy decisions will materially prejudice the public comment and therefore expose the DEIR to a legal challenge that will require that the process be repeated.

1. The refusal to correct the mistake in the DEIR about the "Environmentally Superior Alternative"

The Summary of the DEIR at the beginning of the document says that the "Maximum Restoration Alternative" is the "Environmentally Superior Alternative" (page 2). This is a mistake. The "Maximum Restoration Alternative" is NOT the "Environmentally Superior Alternative." The "Environmentally Superior Alternative" is the "Maintenance Alternative." The correct statement does not appear in the DEIR until the very end of the document:

"The Maximum Recreation and Maintenance Alternatives are the environmentally superior alternatives because they have fewer unmitigated significant impacts than either the proposed project or the Maximum Restoration Alternative. Between the Maximum Recreation Alternative and the Maintenance Alternative, the Maintenance Alternative would be the environmentally superior alternative for two reasons. **While the two alternatives have the same number of significant and unavoidable impacts under CEQA, the Maintenance Alternative has fewer potential environmental effects than the Maximum Recreation Alternative.** First, the Maintenance Alternative would not create new trails, the construction of which could result in impacts to sensitive habitats and other biological resources. Second, over time the Maximum Recreation Alternative would result in Natural Areas with less native plant and animal habitat and a greater amount of nonnative urban forest coverage. The Maintenance Alternative, on the other hand, would preserve the existing distribution and extent of biological resources, including sensitive habitats. **For these reasons, the Maintenance Alternative is the environmentally superior alternative.**" (DEIR, page 525-526) (emphasis added)

Attached is the email correspondence with Jessica Range, the staff member in the Planning Department responsible for the environmental review process, about this error. Ms. Range acknowledges the error, confirms that the "Environmentally Superior Alternative" is the "Maintenance Alternative," but refuses to correct the error until the public comment period is over. (See Attachment VI-A)

Few readers will read a document that is over 500 pages long. This mistake will therefore mislead the public into supporting the "Maximum Restoration Alternative" which expands the destructive and restrictive aspects of the Natural Areas Program. Furthermore, and perhaps more importantly, this expansion is NOT legal because it violates the requirements of the California Environmental Quality Act (CEQA), which requires that the "Environmentally Superior Alternative" has the least negative impact on the environment of all proposed alternatives:

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“§21002. APPROVAL OF PROJECTS; FEASIBLE ALTERNATIVE OR MITIGATION MEASURES

The Legislature finds and declares that it is the policy of the state that **public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects**, and that the procedures required by this division are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects.” CEQA Guidelines, page 2 (emphasis added)

This mistake will profoundly prejudice the public review and comment period. The mistake was exacerbated by the refusal to correct the mistake before the public process was complete.

Although the mistake was verbally acknowledged by the staff of the Planning Department at the beginning of the public hearing on October 6th, it was characterized as a “typographical error.” The dictionary definition of “typographical error” is: *“an error in printed or typewritten material resulting from a mistake in typing or from mechanical failure or the like.”*¹ It is an insult to the public’s intelligence to characterize the substitution of an entire phrase (“Maximum Restoration Alternative”) for another (“Maintenance Alternative”) as a typographical error. Trivializing this error further misleads the public by failing to acknowledge the substantive differences between these alternatives. The “Maintenance Alternative” is at the opposite extreme from the “Maximum Restoration Alternative” in the range of alternatives.

The “Maximum Restoration Alternative” proposes an expansion of the active restoration efforts of the Natural Areas Program to 100% of all acreage designated as “natural areas.” This represents a 73% increase in the acres subjected to tree removals, herbicide applications, recreational access restrictions, and the planting of endangered plants and animals that could potentially require further access restrictions.

In addition to the inaccurate and misleading identification of the environmentally superior alternative, the public notice of the DEIR was inadequate. No mention was made in the original public notice of the locations of the natural areas that would be impacted by the implementation of SNRAMP. No mention was made of the significant impacts on the environment such as the removal of thousands of trees or the loss of recreational access. The public notice did not enable the public to understand that the implementation of SNRAMP would have a significant impact on their parks or their neighborhoods.

2. The public hearing for the DEIR limited public comment

The public review and comment process was further compromised by the last minute decision to hold the public hearing by the Planning Commission earlier than originally announced. The public hearing was originally announced to begin at 1:30 pm on October 6th. Shortly before the hearing, the starting time was moved up to noon.

The public was further confused about the timing of their opportunity to speak to the Commission about the DEIR by the placement of the item on the agenda. The DEIR for the SNRAMP was item number 13 on an agenda with 19 items. The public had no way of knowing when the 13th item would be heard. Many naturally assumed that it would not be at the beginning of the hearing. They were wrong.

¹ Webster’s Collegiate Dictionary, Random House, 1991

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The public comment period on the DEIR for the SNRAMP was completed by 2 pm. Many people came to the hearing, hoping to speak, only to find that they had missed the opportunity to do so.

A few people arrived in time to speak, but didn't arrive in time to hear the staff of the Planning Department acknowledge the mistake about the "Environmentally Superior Alternative." Therefore, they wasted their public comment by focusing on an error that the Planning Department had made a commitment to correct. No one showed them the courtesy of telling them during the hearing that the error would be corrected.

There are many neighbors of the so-called "natural areas" who have been following this issue for 15 years. They were deeply committed to speaking and they were deprived of the opportunity to do so by the change in the time of the hearing.

3. The public was not adequately informed of the extension of the deadline for comment

The President of the Planning Commission requested at the public hearing on October 6th that the deadline for written public comments be extended to October 31st. No effort was made to inform the public of this extension of the deadline. The Planning Department was asked (in writing) to inform any member of the public that had been informed of the original deadline of October 17th of this extension. That request was refused.

Such refusal to provide the public with notification of the extension of the deadline will further compromise the public review process.

4. The public was not adequately informed of the re-opening of the public comment period

The San Francisco Forest Alliance learned (from a neighborhood association) that the public comment on the DEIR was reopened on April 27, 2012 about one week after the notice was mailed. SFFA immediately requested that this public notice be distributed more widely to the neighbors of the natural areas and posted in the natural areas. This request was refused.

According to the mailing list that was used to distribute the notice of the reopening of the public comment period, the same neighborhood associations that were notified of the first public comment period were notified again. The second public comment period was not more widely distributed than the first. The organizations that had an opportunity to comment in October 2011 were essentially given a second opportunity to comment. This is preferential treatment that will further jeopardize the fairness of the public process.

The reopening of the public comment period was another opportunity for the DEIR to be corrected. The incorrect statement on page 2 of the DEIR stating that the Maximum Restoration Alternative is the Environmentally Superior Alternative was not corrected when the public comment period was reopened. That incorrect statement was simply redistributed and reposted to the Planning Department website. Once again, the refusal to correct this statement will prejudice the public comment.

Conclusion

The public review and comment process was severely compromised by a serious mistake and by several actions of the Planning Department staff. The appropriate legal remedies for these mistakes are:

- Correct the DEIR by accurately identifying the "Environmentally Superior Alternative"
- Distribute the corrected DEIR in the same manner as the original was distributed

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- 24
(Cont.)
- **Announce another public hearing along with the corrected DEIR**
 - **Announce another deadline for written public comments that is at least as long as the original period**
 - **Distribute the public notice regarding the new public comment period to the neighbors of the natural areas and post the public notice in the natural areas.**
- The public review and comment period for the DEIR for the SNRAMP has been a stunning display of unfair dealing with the taxpayers who are paying for this project. It is experiences such as this that turn taxpayers into protesters.**

SFFA-3

Attachment VI-A

----- Original Message -----

From: <Jessica.Range@sfgov.org>

To: "Mary McAllister" <marymcallister@comcast.net>

Sent: Thursday, September 22, 2011 10:19 AM

Subject: Re: Question about the Draft EIR for the Natural Areas Program

Dear Ms. McAllister,

Please submit your comments to the Planning Department's Environmental Review Officer and we will address your comments in the Comments and Responses document.

Thank you,

Jessica Range, LEED AP

San Francisco Planning Department

Environmental Planning

1650 Mission Street, Suite 400

San Francisco, CA 94103

Phone: (415) 575-9018 / Fax: (415) 558-6409

www.sfplanning.org

"Mary McAllister" marymcallister@comcast.net

To Jessica.Range@sfgov.org

09/22/2011 08:18 AM

Subject: Re: Question about the Draft EIR for the Natural Areas Program

Ms. Range,

Thank you for your reply. This error will seriously compromise the public comment period because the majority of readers will be unaware of it. The error is made on page 2 of the document and is therefore prominent to readers. Few, if any readers will read the entire document to find the correct statement that does not appear until page 525 of the document, nearly the last page of the document. The error will profoundly prejudice readers to a project alternative that is not preferred by the environmental analysis.

I respectfully request that the document be corrected and recirculated with the correction of the error prominently displayed to readers. When the document has been corrected and recirculated, a new comment period should be announced of equal length to that first announced.

The SNRAMP was approved by the Recreation and Park Department in August 2006. The environmental review has therefore been in process for over five years. It is pointless to jeopardize the environmental review by rushing it after a long delay and a large investment of public funding in its preparation. After five years, another month is an inconsequential further investment in the process.

Without such a remedy, the public comment period will be fatally flawed and will expose the City to legal challenges to both the document and the process used to review and certify it, thereby adding to the expense of the environmental review at a time when public funding is scarce.

Please inform me of the decision to correct this serious error.

Thank you for your cooperation.

Mary McAllister

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----- Original Message -----

From: <Jessica.Range@sfgov.org>

To: "Mary McAllister" <marymcallister@comcast.net>

Cc: <john.bock@tetrattech.com>

Sent: Wednesday, September 21, 2011 4:16 PM

Subject: Re: Question about the Draft EIR for the Natural Areas Program

Ms. McAllister,

You are correct in that there is a contradictory statement in the EIR. The discussion on page 525 contains the detailed analysis of which alternative is the environmentally superior alternative. The discussion on page 2 is incorrect and will be revised in the Comments and Responses document. I am copying the EIR consultant on this email to keep Tetra Tech in the loop.

Thank you for pointing this out.

Regards,

Jessica Range, LEED AP

San Francisco Planning Department

Environmental Planning

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www.sfplanning.org

"Mary McAllister" marymcallister@comcast.net

To "Jessica Range"

09/21/2011 01:26 PM

Jessica.Range@sfgov.org

Subject Question about the Draft EIR for the Natural Areas Program

Hello Ms Range,

I have a question about the Draft EIR for the Natural Areas Program. There are two statements in the DEIR that appear to be contradictory. Can you reconcile these seemingly contradictory statements? If not, can you refer me to someone who can?

Page 2: *"The Maximum Restoration Alternative is the Environmentally Superior Alternative."*

Page 525: *"**The Maximum Recreation and the Maintenance Alternatives are the environmentally superior alternatives** because they have fewer unmitigated significant impacts than either the proposed project or the Maximum Restoration Alternative."* (emphasis added)

Thank you for your help to under[stand] the DEIR.

Mary McAllister

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Public Comment of the San Francisco Forest Alliance
Draft Environmental Impact Report for the Natural Resource Areas Management Plan
Part VII: False assumptions about fire hazards

The Draft Environmental Impact Report (DEIR) for the Significant Natural Resource Areas Management Plan (SNRAMP) makes assumptions regarding fire hazards in San Francisco for which it provides no scientific or experiential evidence:

1. That native vegetation is less flammable than non-native vegetation
2. That thinning trees will reduce fire hazard

These assumptions are false and we will provide scientific and experiential evidence that they are false. Unless the final EIR can provide scientific evidence and/or actual experience to support these assumptions in the DEIR, these statements regarding fire hazards must be revised to be consistent with available evidence.

1. Non-native vegetation, including eucalyptus is NOT inherently more flammable than native vegetation

The DEIR makes the following claims:

"...maximize indigenous vegetation for fire control." (DEIR, page 78)

"...vegetation with high fire hazard ratings such as broom and eucalyptus." (DEIR, page 111,396)

"...replacing highly flammable eucalyptus trees with more fire resistant species." (DEIR, page 410)

Fear of fire has fueled the heated debate about native plant restorations in the Bay Area. Native plant advocates want the public to believe that the non-native forest is highly flammable, that its destruction and replacement with native landscapes would make us safer. Nothing could be further from the truth. The fact is that the forest—whether it is native or non-native—is generally less flammable than the landscape that is native to California. In the specific case of the Sutro Forest in San Francisco, this general principal is particularly true: the existing forest is significantly less flammable than the landscape that is native to that location.

The "Mount Sutro Management Plan" was written by UCSF and is available on their website. It describes "native" Mount Sutro as follows: "In the 1800s, **like most of San Francisco's hills**, Mount Parnassus [now known as Mount Sutro] was covered predominantly with coastal scrub chaparral [sic], consisting of native grasses, wildflowers, and shrubs..." (page 4) (emphasis added)

A Natural History of California¹ tells us that chaparral is not only highly flammable, but is in fact dependent upon fire to sustain itself:

"Chaparral...is...most likely to burn. The community has evolved over millions of years in association with fires, and in fact **requires fire for proper health and vigor**. Thus it is not surprising that most chaparral plants exhibit adaptations enabling them to recover after a burn...**Not only do chaparral plants feature adaptations that help them recover after a fire, but some characteristics of these plants, such as fibrous or ribbonlike shreds on the bark, seem to encourage fire**. Other species contain volatile oils. In the absence of fire, a mature chaparral stand may become senile, in which case growth and reproduction are reduced." (emphasis added)

¹ Allan Schoenherr, UC Press, 1992, page 341

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The local chapter (Yerba Buena) of the California Native Plant Society acknowledges the value of fire to restore and maintain native plant populations. A wildfire fire on San Bruno Mountain in native grassland and coastal scrub "consumed about 300 acres" in June 2008, according to an article on their website². The article reports that

"Fire is an adaptive management tool that, along with natural grazing and browsing, has been missing in promoting healthy grasslands that once covered much of the lower elevations of California...The threats to native grasslands are invasions of non-native grasses and forbs, and succession by native and invasive shrubs. Fortunately the fire scrubbed the canyons pretty clean of just about everything. This gives the land a shot of nutrients to recharge the soil and awaken the seedbanks that have long been lying dormant."

The fire on Angel Island in October 2008, demonstrates that native grassland is more flammable than the non-native forest. According to an "environmental scientist" from the California state park system, 80 acres of eucalyptus were removed from Angel Island 12 years ago in order to restore native grassland. Only 6 acres of eucalyptus remain.³ The fire that burned 400 acres of the 740 acres of Angel Island in 2008 stopped at the forest edge: "At the edge of the burn belt lie strips of intact tree groves...a torched swath intercut with untouched forest."⁴ It was the native grassland and brush that burned on Angel Island and the park rangers were ecstatic about the beneficial effects of the fire: "The shrubs—coyote bush, monkey flower and California sage—should green up with the first storms...The grasses will grow up quickly and will look like a golf course." Ironically, the "environmental scientist" continues to claim that the eucalyptus forest was highly flammable, though it played no part in this fire and there was no history of there ever having been a fire in the eucalyptus during the 100 years prior to their removal.

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(Cont.)

Unfortunately, the 1991 fire in the Oakland hills has enabled native plant advocates to maintain the fiction that eucalyptus is highly flammable. And in that case there is no doubt that they were involved in that devastating fire. However, there were factors in that fire that are not applicable to San Francisco. The climate in San Francisco is milder than the climate in the East Bay because of the moderating influence of the ocean. It is cooler in the summer and warmer in the winter. There are never prolonged, hard freezes in San Francisco that cause the eucalyptus to die back, creating dead, flammable leaf litter. The 1991 fire in the Oakland hills occurred in the fall, following a hard winter freeze that produced large amounts of flammable leaf litter. In fact, there were several wildfires in the Oakland hills in the 20th century. Each followed a hard winter causing vegetation to die back.

According to the FEMA Technical Report, the 1991 Oakland hills fire started in grass, spread to dry brush, and was then driven by the wind to burn everything in its path. The fire burned native plants and trees as readily as eucalyptus.⁵

When it is hot and dry in the Oakland hills, as it was at the time of the 1991 fire, it is cool and damp in San Francisco. Fogs from the ocean drift over the eucalyptus forests, condensing on the leaves of the trees, falling to the ground, moistening the leaf litter.⁶ When the heat from the land meets the cool ocean air, the result is the fog that blankets San Francisco during the summer. These are not the conditions for fire ignition that exist in the Oakland hills.

UCSF applied for a FEMA grant to fund its project to destroy the eucalyptus forest and restore native chaparral, based on its claim that the eucalyptus forest is highly flammable. In its letter of October 1, 2009 (obtained by FOIA request), FEMA raised questions about UCSF's claim of fire hazard. (See Attachment VII-A) FEMA asked UCSF to explain how fire hazard would be reduced by eliminating most of the existing forest, given that **reducing moisture on the forest floor by**

² http://www.cnps-yerbabuena.org/experience/other_articles.html#pageTop

³ "Rains expected to help heal Angel Island," SF Chronicle, October 14, 2008

⁴ "After fire, Angel Island is a park of contrasts," SF Chronicle, October 15, 2008

⁵ FEMA Technical Report on 1991 Oakland Fire, <http://www.usfa.dhs.gov/downloads/pdf/publications/tr-060.pdf>

⁶ Gilliam, Harold, *The Weather of the San Francisco Bay Area*, UC Press, 2002

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eliminating the tall trees that condense the fog from the air could increase the potential for ignition. FEMA also asked UCSF to provide "scientific evidence" to support its response to this question. Rather than answer this and other questions, UCSF chose to withdraw its FEMA application.

The reputation of eucalyptus as a fire hazard is also based on the assumption that oils in its leaves are flammable. The National Park Service reports on its website that the leaves are, in fact, fire resistant: "The live foliage [of the eucalyptus] proved fire resistant, so a potentially catastrophic crown fire was avoided."⁷

The predominant species of eucalyptus in California, the blue gum eucalyptus (*E. globulus*) is native to Tasmania. Scientists at the University of Tasmania conducted laboratory experiments on the plants and trees in the Tasmanian forest to determine the relative flammability of their native species. The blue gum eucalyptus (*E. globulus*) is included in this study. The study reports that, "*E. globulus* leaves, both juvenile and adult, presented the greatest resistance [to ignition] of all the eucalypts studied. In this case, leaf thickness was important as well as the presence of a waxy cuticle." Also, in a table entitled "Rate of flame front movement," the comment for *E. globulus* leaves is "resistant to combustion."⁸ In other words, **despite the oil content in the leaf, its physical properties protect the leaf from ignition.**

Even if oils were a factor in flammability, there are many native plants that are equally oily, such as the ubiquitous coyote brush and bays. According to Cornell University studies, essential/volatile oils in blue gum eucalyptus leaves range from less than 1.5 to over 3.5%.⁹ The leaves of native California bay laurel trees contain 7.5% of essential/volatile oils, **more than twice the amount of oil in leaves of blue gums.**¹⁰

These principles are best illustrated by a photograph of an actual fire in San Diego in 2003 in which all the homes burned to the ground, but the eucalyptus forest surrounding those homes did not ignite:



Source: New York Times

⁷ <http://www.firescape.us/coastliveoaks.pdf>

⁸ Dickinson, K.J.M. and Kirkpatrick, J.B., "The flammability and energy content of some important plant species and fuel components in the forests of southeastern Tasmania," *Journal of Biogeography*, 1985, 12: 121-134.

⁹ <http://www.ansci.cornell.edu/plants/medicinal/eucalyp.html>

¹⁰ <http://www.paleotechnics.com/Articles/Bayarticle.html>

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Likewise, non-native broom is not more flammable than its native counterpart in the chaparral plant community, coyote brush. The leaves of both shrubs are small, the fine fuel that ignites more readily than larger leaves and branches. But the leaves of native coyote brush contain oil not found in non-native broom. And the branches of broom are green to the ground, unlike the branches of coyote brush which become woody thickets with age. Broom therefore contains more moisture than coyote brush, which reduces its combustibility.

Fire is an essential feature of the landscape that is native to California.¹¹ Destroying a non-native forest in order to create a native landscape of grassland and scrub will not reduce fire hazard.

2. Thinning the non-native forest will NOT reduce fire hazard

The DEIR makes the following claim:

"...timber thinning would increase the space between trees, reducing the ability of a fire to rapidly spread."
(DEIR, page 396)

Most fires in California are hot, wind-driven fires in which everything burns. The composition of the fuel load in a wind-driven fire is irrelevant. Everything in its path will burn.¹² The 1991 fire in the Oakland hills was an example of such a fire. According to the FEMA technical report on that fire, both native and non-native vegetation, as well as about 3,800 homes burned in that fire.

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(Cont.)

Windbreaks are therefore one of the few defenses in a wind-driven fire. For that reason, in its letter of October 1, 2009 (see attachment VII-A), FEMA asked UCSF to explain how the destruction of the tall trees on Mount Sutro would reduce fire hazard. FEMA noted that **eliminating the windbreak that the tall trees provide has the potential to enable a wind-driven fire to sweep through the forest unobstructed**. FEMA also asked UCSF to provide "scientific evidence" to support its answer to this question. We repeat, UCSF chose to withdraw its application for FEMA funding of its project rather than answer this question.

In 1987, 20,000 hectares burned in a wildfire in the Shasta-Trinity National Forest. The effects of that fire on the forest were studied by Weatherspoon and Skinner of the USDA Forest Service. They reported the results of their study in Forest Science.¹³ **They found the least amount of fire damage in those sections of the forest that had not been thinned or clear-cut.** In other words, the more trees there were, the less damage was done by the fire. They explained that finding:

*"The occurrence of lower Fire Damage Classes in uncut stands [of trees] probably is attributable largely to the absence of activity fuels [e.g., grasses] and to the relatively closed canopy, which reduces insolation [exposure to the sun], wind movement near the surface, and associated drying of fuels. Conversely, **opening the stand by partial cutting adds fuels and creates a microclimate conducive to increased fire intensities.**"* (emphasis added)

In other words the denser the forest,

- The less wind on the forest floor, thereby slowing the spread of fire
- The more shade on the forest floor.
 - The less flammable vegetation on the forest floor

¹¹ Sugihara, Neil, *Fire in California's Ecosystems*, UC Press, 2006

¹² Keeley, J, and Fotheringham, "Impact of past, present, and future fire regimes on North American Mediterranean shrublands, pages 218-262 in Veblen, et al., editors, *Fire and climate change in temperate ecosystems of the Western Americas*, 2003.

¹³ Weatherspoon, C.P. and Skinner, C.N., "An Assessment of Factors Associated with Damage to Tree Crowns from the 1987 Wildfires in Northern California," *Forest Science*, Vol. 41, No 3, pages 430-453

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- The more moist the forest floor

All of these factors combine to reduce fire hazard in dense forest. Likewise, in a study of fire behavior in eucalyptus forest in Australia, based on a series of experimental controlled burns, wind speed and fire spread were significantly reduced on the forest floor.¹⁴

Furthermore, a recently published study corroborates that thinning the forest does not significantly reduce fire risk, nor does it increase carbon storage in the forest¹⁵

"It has been suggested that thinning trees and other fuel-reduction practices aimed at reducing the probability of high-severity forest fire are consistent with efforts to keep carbon (C) sequestered in terrestrial pools, and that such practices should therefore be rewarded rather than penalized in C-accounting schemes. By evaluating how fuel treatments, wildfire, and their interactions affect forest C stocks across a wide range of spatial and temporal scales, we conclude that this is extremely unlikely. **Our review reveals high C losses associated with fuel treatment, only modest differences in the combustive losses associated with high-severity fire and the low-severity fire that fuel treatment is meant to encourage, and a low likelihood that treated forests will be exposed to fire.** Although fuel-reduction treatments may be necessary to restore historical functionality to fire-suppressed ecosystems, we found little credible evidence that such efforts have the added benefit of increasing terrestrial C stocks." (emphasis added)

Thinning the forest will not reduce fire hazard. In fact, it will increase fire hazard.

The DEIR also says that fire hazard will be reduced by removing dead trees:

"Removed trees would include those that are diseased and dying, thereby reducing easily combustible fuel loads." (DEIR, page 396)

We do not dispute that dead trees are more flammable than living trees because they contain less moisture, one of the key variables in combustibility. However, we have established in another comment (Part I) that the claim that only dead and dying trees will be removed is contradicted by the SNRAMP which the DEIR is supposedly evaluating. There is no evidence that the trees that will be removed are dead or dying. Furthermore, if the predictions of experts on Sudden Oak Death prove to be true, 90% of the native oak woodland which SNRAMP proposes to expand will be dead and highly flammable within 25 years.¹⁶

Conclusion

Unless scientific evidence can be provided to support statements in the DEIR regarding fire hazard, the final EIR must be corrected to reflect the scientific and experiential evidence that refutes it:

- **Native vegetation is not inherently less flammable than non-native vegetation, including eucalyptus**
- **Thinning the forest will not reduce fire hazards.**

¹⁴ Gould, J.S., et. al., Project Vesta: Fire in Dry Eucalyptus Forests, Commonwealth Scientific and Industrial Research Organization and Department of Environment and Conservation, Western Australia, November 2007

¹⁵ John L. Campbell, Mark E. Harmon, Stephen R. Mitchell, "Can fuel-reduction treatments really increase forest carbon storage I the western US by reducing future fire emissions,? Frontiers in Ecology and Environment, 2011, 10,1890/110057.

¹⁶ Fimrite, Peter, "Sudden oak death cases jump, spread in the Bay Areas," San Francisco Chronicle, October 2, 2011

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(HM) PA
 F ST DR: PDM07
 Project # 29
 OES #: 000-92294
 A G H
 M P S
 Doc Date: 10-1-09



FEMA

Department of Homeland Security
 1111 Broadway, Suite 1200
 Oakland, CA 94607-4052

Attachment VII-A

October 1, 2009

Mr. Frank McCarton
 Governor's Authorized Representative
 California Emergency Management Agency
 3650 Schriever Ave.
 Mather, CA 95655



Re: Response to Request for Information — PDM09-PJ14 Ref 109-1568
 PDMC-PJ-09-CA-2009-001, Mt Sutro Edgewood Avenue
 PDMC-PJ-09-CA-2007-010, Mt Sutro South Ridge — PDM07-PJ29 Ref 109-1569
 Vegetation Management (Wildfire Risk Reduction) Projects
 Subgrantee: University of California, San Francisco

Dear Mr. McCarton:

On July 21, 2009, the Department of Homeland Security's Federal Emergency Management Agency transmitted a Request for Information to the California Emergency Management Agency (Cal EMA) regarding the subject proposals. Your office forwarded this request to the University of California at San Francisco (UCSF), and UCSF provided a response letter, dated August 10, 2009, which was subsequently forwarded to, and received by, FEMA on September 3, 2009. FEMA has reviewed the letter prepared by UCSF and is providing a response and subsequent requests. This letter generally addresses the purpose and need for action, the effectiveness of the proposed projects, and appropriate alternatives to the proposed projects, which are required for FEMA's compliance with the National Environmental Policy Act (NEPA). Please note, however, that FEMA may later require additional information to complete its environmental and historic compliance process.

UCSF must clarify and provide supporting documentation for the statements and claims made in its August 10, 2009, response letter in order to strengthen its arguments for the need as well as the efficacy of the proposed projects. Specifically, UCSF will need to provide the following:

- An accurate, informed, and robust argument regarding the purpose and need for the projects,
- A complete profile of the wildfire hazard in the Sutro Forest,
- A clear analysis of how the built environment is vulnerable to a wildfire hazard in the Sutro Forest,
- A clear description of the anticipated effectiveness of the proposed projects in mitigating the wildfire hazard to the identified vulnerable built environment, and

www.fema.gov

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Mr. Frank McCarton
October 1, 2009
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- A clear description of potential alternative actions that could also mitigate the wildfire hazard to the identified vulnerable built environment.

UCSF needs to provide information in a clear and concise manner, including appropriate citations. UCSF needs to supply applicable and appropriate quantified data to support its claims. All analyses and claims made by UCSF need to be reproducible and verifiable by FEMA (or the general public) should FEMA determine it necessary to conduct its own independent analyses. Reports described by UCSF that were not a part of the original grant applications must be provided.

1. Clarify the Wildfire Hazard

In its response to provide a clarification of the wildfire hazard, UCSF inaccurately interprets a map, provides inadequate details regarding the history of wildfires in the Sutro Forest, and provides a simplistic and ineffective comparison of the wildfire hazard in the Sutro Forest to the hazard in other areas that have burned in the San Francisco Bay area. UCSF states that "the San Francisco Department of Emergency Management has adopted a CDF Wildfire Hazard Map as part of its Hazard Mitigation Plan, which confirms that the proposed project sites are in fact very high wildfire hazard areas." This conclusion represents an inaccurate interpretation of the referenced map. Not only does the text of the Hazard Mitigation Plan that references this map state that the map illustrates only the extent and not the probability of a wildfire, the text on the actual map specifies that fuel ranks classify areas based not on hazard potential but on existing vegetation and anticipated fire behavior in that vegetation type. As explained by Dave Sapsis (CDF Fire and Resource Assessment Program (FRAP) Wildland Fire Scientist), "Fuel rank is only one of the two components used to get to future threat. The other is rotation rank which is an estimator for future burn probability." The map provided by UCSF illustrates expected wildfire behavior, but omits any estimate of fire likelihood, and because fuel ranks do not correlate directly to the full profile of a wildfire hazard, the map cannot be used to identify the hazard. A complete profile of the wildfire hazard in the Sutro Forest will require the input of information on the probability for an area to experience appropriate conditions to promote a wildfire (ignition and weather/climate). The FRAP "Draft Fire Hazard Severity Zones in LRA" (FHSZ) map for the County of San Francisco more aptly characterizes the actual wildfire hazard in the County and City of San Francisco. As described by Dave Sapsis:

FHSZ differs from fire threat in the way fire probabilities were used, the way fuel systems were modeled for potential not current conditions, and how fuel systems influence the areas around them. Fire threat is a measure of in situ hazard, and doesn't include the influence of adjacent areas (either via flame spread or firebrands). This makes sense since fire threat was designed to characterize wildland fuel hazards, and FHSZ was designed to include those areas (as potential) and adjacent urbanized WUI [Wildland Urban Interface] areas as well.

The 2007 FHSZ map shows the Sutro Forest to have a "Moderate" wildfire hazard. In the 2007 FHSZ map, "Moderate" is the lowest of the three fire hazard severity zones. The 2007 FHSZ maps can be viewed at this website,
http://www.fire.ca.gov/fire_prevention/fhsz_maps/fhsz_maps_sanfrancisco.php.

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If UCSF disputes the "Moderate" fire hazard severity zone given by FRAP for the Sutro Forest, UCSF may provide its own site-specific analysis of the wildfire hazard for the Sutro Forest. Specifically, UCSF will need to identify the ignition source, measure the fuel load, and analyze the capacity for the fuel to ignite across the Sutro Forest given existing fuel moisture and weather conditions. Additionally, if UCSF prefers to match the modeling integrity of the FRAP mapping effort, it must model potential fuels over a 30 to 50 year time horizon.

UCSF briefly described previous fires that occurred in the Sutro Forest. An examination of past hazard events is an important step in profiling and characterizing a potential hazard condition, and therefore UCSF must provide adequate detail about these previous events for this historic information to be relevant to current conditions. The source material of previously documented fires must be provided, and ideally, this would include details about where the fires occurred, the fire ignition sources, the time of year of each fire, and a list of structures that were damaged. Additionally, UCSF must provide an estimate of the successional stage of the Sutro Forest during each fire event and an analysis of the relevance of these previous fires to current forest conditions.

UCSF also mentioned reports of a fire that occurred approximately 20 years ago and two additional fires that occurred in the past decade. These fire events must be described in more detail to demonstrate that the nature of the fires (ignition source, cause, extent, season of fire) is relevant to the current condition of the Sutro Forest.

In its response letter, UCSF relates its wildfire hazard to previous wildfires that occurred in the San Francisco Bay area, specifically one that occurred "in Marin County along the coast" and a fire that occurred on Angel Island in 2008. For the wildfire hazard conditions at Sutro Forest to be compared to these two fires, UCSF must demonstrate the similarities between Angel Island, the referenced "Marin County" fire, and the Sutro Forest in terms of the hazard, i.e. ignition threats, weather conditions, forest type, etc.

2. Clarify the Risk to the Built Environment

FEMA understands that the built environment adjacent to the Sutro Forest is extensive and dense and includes several medical facilities, residential housing, transit infrastructure, and a large teaching college and research facility. However, UCSF must provide a more clear description and complete analysis of the vulnerability of the built environment to a wildfire in the Sutro Forest.

To improve its vulnerability analysis, UCSF must inventory the built environment, describe the methodology of its vulnerability analysis, describe data limitations, provide an exposure analysis to the hazard, summarize the impacts of the hazard, and describe likely land use and development trends that may affect the vulnerable built environment in the future. The analysis must address the vulnerable general building stock, critical and non-critical facilities, major utilities, and transportation infrastructure. This analysis must include vulnerability to a wildfire anywhere in the Sutro Forest, not just at the proposed project sites. It would be useful to describe the built environment in three geographic locations throughout the analysis: 1.) within the Sutro Forest, 2.) immediately adjacent to the forest, and 3.) in the vicinity of the forest.

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Mr. Frank McCarton
October 1, 2009
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UCSF's response letter describes replacement cost of structures, which implies worst-case scenario physical damage. Considering some structures may be more resistant to fire than others, it is likely that some structures affected by a wildfire in the Sutro Forest would not require complete replacement. UCSF must provide a more moderate and reasonable estimate of loss to building stock that considers the fire resistance of structures.

The vulnerability analysis would be more realistic if it addressed firefighting capabilities to battle a wildfire in the Sutro Forest. Firefighting capabilities may also affect the vulnerability of the built environment (for instance, structures within Sutro Forest) to a wildfire in the Sutro Forest.

3. Clarify How the Proposed Mitigation will Reduce the Wildfire Risk

Assuming that UCSF has been able to establish a clear need for the proposed projects, the efficacy of the mitigation strategy it proposes must be clarified. UCSF must provide a clear and concise analysis and description of how the proposed projects would reduce the wildfire hazard in the Sutro Forest to the identified vulnerable built environment. This analysis must account for the fact that large parts of the Sutro Forest would be unchanged after the implementation of the proposed projects.

In the July 21, 2009, letter, FEMA requested that UCSF describe the specific hazard conditions after completion of the proposed work and the resultant hazard over the life of the proposed projects. FEMA has not been provided information from UCSF that clearly addresses this request. To repeat FEMA's initial request, UCSF must provide information of the probable change in wildfire hazard throughout Sutro Forest after the proposed projects have been implemented and the probable change in wildfire hazard throughout Sutro Forest throughout the useful life of the proposed projects. This analysis must be based on accepted scientific methodology and must be presented to FEMA in a manner that can be verified by FEMA (or the interested public). This analysis must incorporate the 5-year maintenance schedule described by UCSF in its grant applications and must also provide details with regard to the specific built environment that will benefit from the proposed projects.

In its August 10, 2009, response letter, UCSF alludes to the notion that the proposed projects would improve wildfire firefighting capabilities within the proposed project areas. To improve the credibility of this argument, UCSF must incorporate the existing firefighting capabilities to fight a wildfire in the Sutro Forest and to then provide a direct comparison of how the proposed projects will result in improvements in these capabilities. Providing copies of letters from fire departments to this effect may be useful in strengthening this particular argument.

The August 10, 2009, response letter, states that "the Edgewood Avenue Area Project will be informed by the lessons learned in the South Ridge Area Project". If this is to be the case, UCSF must clarify if it may request a change in the Scope of Work contained in its Edgewood Avenue grant application as a result of the "lessons learned" from implementing the proposed South Ridge project.

SFFA-3

Mr. Frank McCarton
October 1, 2009
Page 5

FEMA has received a number of unsolicited public comments concerning the effects of tree removal on fuel moisture levels in the Sutro Forest. Commenters argue that the proposed projects would increase wildfire hazard by removing some of the material that collects fog drip and keeps the forest moist and resistant to ignition and fire, thus allowing the forest to dry out more easily and increase the relative hazard for ignition. Can UCSF specifically address this comment and describe how overall forest moisture content will change after implementation of the proposed projects? Please provide scientific evidence to support any claims.

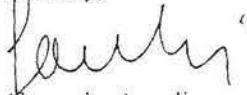
Additionally, several of these unsolicited public comments have stated that the proposed projects could result in changed wind patterns on Mount Sutro which could also increase the wildfire hazard in the forest. New wind patterns could reduce biomass moisture as well as reduce the effective windbreak created by the current forest. These commenters argue that the effective windbreak created by the existing forest limits the potential for wildfire spread in the forest and the immediately surrounding area. As UCSF has stated, winds are a contributing factor in wildfires. Provide a citable and logical defense regarding how the proposed projects, and the resulting changes in wind patterns, would not result in an increase in the wildfire hazard in the Sutro Forest.

4. Describe Alternatives to the Proposed Work

UCSF has failed to identify alternatives to the proposed projects that meet the purpose and need of wildfire mitigation. Assuming that UCSF has been able to establish a clear need for wildfire mitigation activities, UCSF must conduct a more thorough analysis to identify alternatives to the proposed projects that could mitigate wildfire hazard in the Sutro Forest to the vulnerable built environment. These alternatives must be technically, economically, and legally practical and feasible and can include activities not eligible for FEMA grant funding. As described in FEMA's Wildfire Mitigation Policy, MRR-2-08-1, FEMA wildfire mitigation grants are available for defensible space, structural retrofit, and vegetation reduction projects. It would seem reasonable that alternatives to the proposed projects could include defensible space or retrofit projects. UCSF has not indicated that these types of alternate projects have been analyzed. Please note that FEMA funding is available for ignition-resistant construction projects only after defensible space activities are complete.

FEMA requests a response within 31 days of the date of this letter, or by November 1, 2009, including a schedule of when the requested information will be provided. Should you have any questions or need further assistance please do not hesitate to contact me at (510) 627-7027 or fema-rix-ehp-documents@dhs.gov.

Sincerely,



Alessandro Amaglio
Environmental Officer

SFPGA-1

From: [Richard Harris](#)
Reply To: richard@erskinetulley.com
To: linda.avery@sfgov.org
Cc: bill.wycko@sfgov.org; Jessica.Range@sfgov.org; 'Sarah B. Jones'; Dawn.Kamalanathan@sfgov.org; 'Philip Ginsburg'; margaret.mcarthur@sfgov.org; karen.mauney-brodek@sfgov.org; 'Bo Links'
Subject: Historic Preservation Commission; Sept. 21 meeting; Sharp Park Golf Course is Historical Resource
Date: 09/20/2011 03:53 PM
Attachments: [00002519.PDF](#)

San Francisco Historic Preservation Commission
Attn: Linda Avery, Commission Secretary

Dear Ms. Avery,

The San Francisco Public Golf Alliance will attend Wednesday afternoon's public meeting of the Historic Preservation Commission, and will present our initial public comment on the Natural Areas Management Plan Draft EIR, as it relates to the Sharp Park Golf Course, a designated historical resource of the City and County of San Francisco. Enclosed is a copy of the letter we will submit; the attached copy does not include the exhibits, which are extensive, and which we will submit in hard copy to the Commission. This is an initial comment, focusing on the historical resource itself; we will submit additional comments at a later time on the issue of the Management Plan's significant impacts upon the historical resource at Sharp Park Golf Course.

Best Regards.

-- Richard Harris
San Francisco Public Golf Alliance
415-290-5718

SFPGA-1

SAN FRANCISCO
PUBLIC GOLF ALLIANCE



235 Montgomery St., #400, San Francisco, CA. 94104 * 415-392-5431, ext. 203 * info@sfpublicgolf.com

September 20, 2011

RECEIVED
SEP 27 2011

San Francisco Planning Department
Attn: Bill Wycko, Environmental Review Officer
1650 Mission St., #400
San Francisco, CA. 94103

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
RECEPTION DESK

Re: Supporting "Historical Resource"
Designation for the Sharp Park Golf Course
Significant Natural Resources, etc.
DEIR No. 2005.1912E

Dear Planning Department and Mr. Wycko,

01

The San Francisco Public Golf Alliance supports the determination¹ of the San Francisco Planning Department that Sharp Park Golf Course (hereinafter "Sharp Park," or "golf course"), designed by Dr. Alister MacKenzie and opened for play in 1932, is an "historical resource" under the California Environmental Quality Act.²

¹ Historic Resource Evaluation Response (true copy attached hereto as Exhibit 1), signed February 15, 2011 by Senior Preservation Planner Tina Tam, at page 2, section 3. It is incorporated into Appendix C (at pages 2-5) to the Draft Environmental Impact Report on the Significant Natural Resource Areas Management Plan, dated August, 2011 (the "SNRAMP DEIR"), together with the supporting Historical Resources Evaluation Report (at Appendix C, pages 10-37) and Department of Public Resources form 523A (at Appendix C, pages 39-56):

<http://sfmea.sfplanning.org/2005.1912E DEIR4.pdf>. The determination is discussed in the SNRAMP DEIR, inter alia, at pages 206-209: <http://sfmea.sfplanning.org/2005.1912E DEIR.pdf>

² The instant letter is limited to issue of the Planning Department's "historical resource" determination. The Public Golf Alliance will address other issues raised by the SNRAMP DEIR—including the issues of significant impacts to the Sharp Park Golf Course, and mitigation for those impacts—in separate letters.

SFPGA-1

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(Cont.)

**I. SHARP PARK GOLF COURSE MEETS CEQA CRITERIA
FOR "HISTORICAL RESOURCE" DESIGNATION**

Sharp Park Golf Course is a well-known Pacifica historical site. Both the golf course and its clubhouse are separately identified as "historical sites" by the City of Pacifica³ General Plan, adopted in 1980.^{4,5} The Pacifica Historical Society, official historian of the City of Pacifica, by unanimous resolution dated June 14, 2011, designated Sharp Park Golf Course as an "historical and cultural resource".⁶

³ Sharp Park is located in the City of Pacifica, but owned by the City and County of San Francisco; other San Francisco extraterritorial properties in San Mateo County include the San Francisco Airport, Crystal Springs reservoirs and watershed lands, and the San Francisco County Jail in San Bruno.

⁴ The "historic sites" designation is found in the Historic Preservation Element and Historic Sites Map of the Pacifica General Plan, at pages 95 and 95a:
<http://www.cityofpacific.org/civica/filebank/blobdload.asp?BlobID=3443>
(True copies of relevant excerpts from the General Plan, including the Historic Preservation Element and Historic Sites Map, are attached hereto as Exhibit 2.)

⁵ The San Francisco Planning Department's Historic Resource Evaluation Response (see footnote 1 above, and Exhibit 1 hereto) states, at page 1, that the golf course was in 2009 designated by the City of Pacifica as an historic landmark. While it is true that the issue of landmarking the golf course was considered at the Pacifica Planning Commission's July 20 and September 8, 2009 public meetings, the Commission indefinitely tabled the matter after several commissioners said they wanted to wait until the property owner—the City and County of San Francisco—conducted its own historical study. Pacifica Planning Commission, Agenda and Minutes of September 8, 2009 public meeting, at pages 3-8. (True copy attached hereto as Exhibit 3.)

⁶ Resolution of Pacifica Historical Society Recognizing Sharp Park Golf Course As An Historical Resource, June 14, 2011, together with letter of the same date from Pacifica Historical Society to Pacifica Mayor Mary Ann Nihart, San Francisco Mayor Ed Lee, and San Mateo County Board of Supervisors President Carole Groom:
<http://www.sfpublicgolf.com/LiteratureRetrieve.aspx?ID=88128>
(True copies are attached hereto as Exhibit 4.)

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The golf course is also nationally recognized as one of America's "culturally significant landscapes at risk for alternation or destruction," by the Cultural Landscape Foundation of Washington, D.C.⁷

The criteria for a property to be designated as an "historical resource" under the California Environmental Quality Act, as set forth in 14 California Code of Regulations, Section 15064.5(a)(3)⁸, include the following:

"(A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage" and

"(C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values."

1. Sharp Park is the work of Master Architect Dr. Alister MacKenzie

Sharp Park meets the criteria as "historical resource" under CCR 15064.5(a)(3)(C), because it was designed by Dr. Alister MacKenzie⁹, the best-known, most influential, and arguably the greatest golf architect in history.

His other courses include Augusta National, home of the annual Masters Tournament, and the Cypress Point

⁷ Cultural Landscape Foundation, "Landslide," July 10, 2009, "Alister MacKenzie's Sharp Park," (copy attached hereto as Exhibit 5.A): <http://tclf.org/landslides/sharp-park-golf-course-threatened-closure>. The Cultural Landscape Foundation is a non-profit preservationist organization, whose "Landslide" project identifies nationally-significant landscapes at risk for destruction. See: <http://tclf.org/about>; <http://tclf.org/landslide/about>; <http://tclf.org/landslide/risk-landscapes> (true copies of the relevant excerpts from the Foundation's website are attached hereto as Exhibit 5.B, 5.C., and 5.D, respectively.)

⁸ 14 California Code of Regulations, Section 15064.5: <http://www.sfpublicgolf.com/LiteratureRetrieve.aspx?ID=93349> (A true copy of Section 15064.5 is attached hereto as Exhibit 6.)

⁹ Resolution to employ Dr. Alister MacKenzie, San Francisco Board of Supervisors Resolution No. 33588, December 20, 1930 (copy attached hereto as Exhibit 7).

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Club on the Monterey Peninsula; these two courses are currently ranked as No. 1 and No. 4 on Golf Digest Magazine's list of "America's Greatest Courses."¹⁰ A third MacKenzie course--Royal Melbourne in Australia--is regularly mentioned with Augusta and Cypress among the 10 "greatest" golf courses in the world. Dr. MacKenzie was the first architect inducted into the World Golf Hall of Fame¹¹, and is recognized by golf architecture authorities as the historic architect who had the greatest influence on modern golf course design.¹²

Dr. MacKenzie proclaimed his design principles in two books: "Golf Architecture" (1920), and "The Spirit of St. Andrews" (published posthumously, 1995). In a nutshell, Dr. MacKenzie prescribed that golf should be both challenging and enjoyable by players of all abilities, and that the golf course itself should be beautiful. "... while always keeping uppermost the provision of a splendid test of golf, I have striven to achieve beauty," Dr. MacKenzie said. "This excellence of design is ... constantly exercising a subconscious influence upon [the golfer] and in course of time he grows to admire such a course as all works of beauty must be eventually felt and admired."¹³

¹⁰ Golf Digest Magazine, "America's 100 Greatest Golf Courses, 2009-2010" (copy attached hereto as Exhibit 8): http://www.golfdigest.com/golf-courses/golf-courses/2009-05/100_greatestgolfcourses

¹¹ World Golf Hall of Fame, MacKenzie biography: <http://www.worldgolfhalloffame.org/hof/member.php?member=1078> (copy attached hereto as Exhibit 9); more details of Dr. MacKenzie's architectural career can be found at Links & Harris, "MacKenzie's Sharp Park Under Siege," *Golf Club Atlas*, September, 2009: <http://golfclubatlas.com/in-my-opinion/sharp-park> (copy attached hereto as Exhibit 10). Co-author Links is the volunteer golf historian for the City and County of San Francisco, and author of two golf historical novels: *Follow the Wind* (Simon & Schuster, 1995), and *Riverbank Tweed and Roadmap Jenkins, Tales from the Caddy Yard* (Simon & Schuster, 2001).

¹² In their definitive encyclopedia of golf architecture, *The Architects of Golf*, (Harper Collins, 1993), authors Geoffrey S. Cornish and Ronald E. Whitten say (at page 332): "Of all the course architects of the Golden Age of Golf Design, MacKenzie probably exerted the greatest influence on contemporary design." (A copy is attached hereto as Exhibit 11.)

¹³ Alister MacKenzie, "The Spirit of St. Andrews," Sleeping Bear Press, 1995 (copies of cited pages are attached as Exhibit Ex. 12), p. 51.

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Dr. MacKenzie explained that he left the practice of medicine for golf architecture, out of a "... firm conviction of the extraordinary influence on health of pleasurable excitement, especially when combined with fresh air and exercise."¹⁴

2. Sharp Park is a Rare Public Seaside Links.

Sharp Park meets a second "historical resource" criterion listed in CCR 15064.5(a)(3)(C): it "embodies the distinctive characteristics of a type.. of construction". Sharp Park is a true seaside links, a rare and historically significant type of golf course.

Among the scores of beloved golf courses built by Dr. MacKenzie around the world, Sharp Park is one of his very few public courses. With the Eden Course at St. Andrews, Scotland (which he co-designed with his London partner, H.S. Colt), Sharp Park shares the distinction as Dr. MacKenzie's only public seaside links in the world.¹⁵

Although a rarity in America, the seaside links type of course has particular significance to the sport of golf, because the sport originated on seaside links courses in Scotland. In recognition of the historic significance of seaside links, the British Open Championship--one of golf's four annual major championships--is played exclusively on links courses.

Dr. MacKenzie was an expert on seaside links, which he considered "... the type of land easily the most suitable for the game."¹⁶ Before immigrating to Northern California in the mid-1920's, he was consulting architect at St. Andrews, Scotland, where he was the first to map the famous mounds, swales, pits, and bunkers of the Old Course, the birthplace of golf.

¹⁴ Id., at 246

¹⁵ The "seaside links"--playing fields built in the sand by the seashore--is the oldest type of golf course. St. Andrews, North Berwick, and the other Scottish public courses where the sport originated, are seaside links. In America, this type of course is rare; and open-to-the-public seaside links are even rarer. In California, such public courses exist only on the Monterey Peninsula (Spanish Bay and Pacific Grove), and at Sharp Park.

¹⁶ Alister MacKenzie, "The Spirit of St. Andrews," supra, at p. 1.

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At Sharp Park, Dr. MacKenzie and his construction team¹⁷ intentionally created a Scottish-style seaside links on what had originally been an artichoke farm surrounding the brackish Laguna Salada (Spanish for "salty lake") at Salada Beach¹⁸, in what is today the Sharp Park District of Pacifica.^{19, 20} Construction superintendant Chandler Egan marveled at the site's "remarkable seascape," prompting news reporters to hail Sharp Park as "a seaside municipal course of outstanding character akin to those of the English and Scottish coasts,"²¹ and "a second St. Andrews and the finest municipal golf course in America."²²

¹⁷ Prominent architects H. Chandler Egan, Robert Hunter, and John Fleming—all of whom worked with Dr. MacKenzie at Cypress Point and in renovating Pebble Beach for the 1929 U.S. Amateur--were MacKenzie's assistants at Sharp Park. They were also assisted by San Francisco Recreation and Park Director John McLaren, the father of Golden Gate Park, who planted the Monterey Cypress which define many of Sharp Park's fairways. (See: Alister MacKenzie, "The Spirit of St. Andrews," *supra* [Ex. 12] at p. 172.) Sharp Park's clubhouse was designed by Angus McSweeney, an architect in the Willis Polk office. (See, San Francisco Historical Society, Encyclopedia of San Francisco: <http://www.sfhistoryencyclopedia.com/articles/p/polkWillis.html>, copy attached hereto as Exhibit 13.)

¹⁸ A story in the February 23, 1930 San Francisco Chronicle reports: "More than half of the holes border on Lake Salada, which John McLaren, superintendent of parks, transformed from a salt water marsh into a picturesque fresh-water pool." (True copy attached as Exhibit 14.)

¹⁹ Dr. MacKenzie's original 1930 routing plan (<http://sfpublicgolf.heySMARTguy.com/LiteratureRetrieve.aspx?ID=75636>) and the 1932 as-built map of the golf course (<http://sfpublicgolf.heySMARTguy.com/LiteratureRetrieve.aspx?ID=75637>) were published in the San Francisco newspapers at the time; true copies are attached hereto as Exhibits 14 and 15.)

²⁰ See historic photographs of the artichoke farm before the golf course, the clubhouse in the early 1930's, and original Hole #4 (with lady golfer), true copies of which are attached hereto Exhibits 16.A, 16.B, and 16.C, respectively.)

²¹ "Appropriation for Third S.F. Golf Course Receives Okeh," *San Francisco Examiner*, February 22, 1930, at p. 15. (True copy attached hereto as Exhibit 17.)

²² "H. Chandler Egan Praises Possibilities of Sharp Park Golf Links," *San Francisco Chronicle*, February 26, 1930, at p. H-3. (True copy attached hereto as Exhibit 18.)

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3. Sharp Park's Place in California And San Francisco History

Sharp Park also meets the "historical resource" criterion set forth in CCR Section 15064.5(1)(3)(A): it "is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage."

Sharp Park has long been known as "the poor man's Pebble Beach," and its opening in 1932 was part of a broad movement to extend the sport of golf to the American public. "I hope to live to see the day when there are the crowds of municipal courses, as in Scotland, cropping up all over the world," Dr. MacKenzie said.²³ Sharp Park's tradition of low greens fees has made it a favorite over the years of low-income golfers, racial minorities, juniors, and seniors. In 1955, Sharp Park hosted the initial championship tournament of the Western States Golf Association, one of America's oldest African-American golf associations.²⁴

Sharp Park also reflects San Francisco's tradition of great public architecture. From City Hall and the Beaux Arts palaces at Civic Center to the Golden Gate Bridge, Bay Bridge, and Golden Gate Park, San Francisco proclaimed itself a world cultural and artistic center through its public architecture. The hiring of the world's preeminent golf architect to build a public seaside links golf course in the spirit of St. Andrews is in keeping with this aspect of San Francisco's personality.

4. Sharp Park Has Retained Its Integrity.

Seventy-nine years after its opening in 1932, 12 of Sharp Park's current 18 holes are MacKenzie originals - being holes numbers 1, 2, 3, 8, 9, 10, 11, 13, 14, 15, 17, and 18; two other holes (numbers 12 and 16) lie in original

²³ Alister MacKenzie, "The Spirit of St. Andrews," supra (fn. 13), at p. 250. (True copy attached as Exhibit 12.)

²⁴ Western States Golf Association website, "Legacy": <http://www.westernstatesgolf.org/our-legacy/> (True copy attached as Exhibit 19.)

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fairways, but do not have the original greens.²⁵ Four new holes were built east of the highway in 1941, after Dr. MacKenzie's death, by his assistant John Fleming, when the original strand holes were replaced by a seawall.

In the years since its opening in 1932, trees have grown and come down, some sand traps have grassed-in and others have built-up, mowing patterns on some greens have changed, and the old course has suffered other insults of the aging process. Notwithstanding, Sharp Park retains Dr. MacKenzie's routing, character, and artistry.²⁶ His trademark heaving, tumbling greens can still be seen on current holes 1, 2, 3, 9, 10, 11, 13, 14, 15, 17, and 18. The rolling fairways and mounds on current holes 1, 3, 10, 14, 16, and 17 mimic the famous fairway bumps and hollows at the Old Course at St. Andrews, where MacKenzie once served as consulting architect. At current Holes 1 and 14, there are classic examples of MacKenzie "deception bunkers," placed some distance in front of the greens in such a way as to camouflage the actual distance between bunker and the green.

Overarching all is the great beauty of the golf course as a work of art. MacKenzie's ability to create beautiful natural-appearing landscapes that simultaneously function as playing fields for the full range of golfing abilities was his true genius. This beauty is a constant

²⁵ The survival of the original golf holes can be plainly seen by a comparison of: (1) MacKenzie's original 1930 routing plan and the 1932 as-built map (see fn. 19, above, and Exhibits 14 and 15 hereto); (2) Opening Day, 1932 hole descriptions by MacKenzie's assistant Jack Fleming, as reported in a March, 1932 account by San Francisco Call-Bulletin reporter Frank P. Noon (true copy attached as Exhibit 20); (4) a 1941 aerial photo of the golf course, <http://sfpublicgolf.com/LiteratureRetrieve.aspx?ID=40208> (true copy attached as Exhibit 21); and (5) a 2008 aerial photo of the golf course, <http://sfpublicgolf.com/LiteratureRetrieve.aspx?ID=40209> (true copy attached as Exhibit 22).

²⁶ Geoff Shackelford, "Sharply Divided," *Golf World*, July 20, 2009: http://www.golfdigest.com/golf-tours-news/2009-07/golf_sharp_park_shackelford_0720 (copy attached hereto as Exhibit 23.) For a detailed description, with photographs, of the MacKenzie design features seen today in the surviving original holes, see: *Golf Club Atlas*, "MacKenzie's Sharp Park Under Siege," *supra* (fn.11) (true copy attached as Exhibit 10).

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at Sharp Park, where Dr. MacKenzie's design principles and hallmarks remain visible to this day.^{27, 28}

As a result, Sharp Park is a living public museum of golf architecture.²⁹ In the words of San Francisco favorite son and 1964 U.S. Open golf champion Ken Venturi, this golf course is "Dr. MacKenzie's great gift to the American public golfer."³⁰

Today, the course is at the same time beautiful, challenging, and playable for players of all abilities. Golf architecture historian Geoff Shackelford sums up Dr. MacKenzie's design at Sharp Park as follows: "... no municipal course design has ever come close to matching the overall package of beauty and affordable links-style golf."³¹ Dr. MacKenzie's beautiful cultural landscape is enjoyed not only by golfers, but as well by passersby who view the course from the California Coastal Trail, which borders the course atop the seawall.

Dr. MacKenzie, an international master golf architect with unparalleled expertise in seaside links courses, designed Sharp Park in the style of the historic Scottish public links. In this way, he tied American golfers to the roots of the Scottish game. It is one of only three public seaside links courses in California, and

²⁷ Declaration of golf architect Robert Trent Jones, Jr., May 12, 2011, at paragraphs 11-16 (true copy attached hereto as Exhibit 24).

²⁸ Those who want to close the golf course deny Sharp Park's history, citing golf author Daniel Wexler and San Francisco Rec & Park Department golf course gardener Joe Faulkner in support of their argument. However, both Mr. Wexler and Mr. Faulkner have publicly and in writing defended Sharp Park's historic value, and criticized Sharp Park's detractors for misrepresenting their work. See Daniel Wexler letter, July 19, 2009 (true copy attached hereto as Exhibit 25): <http://www.sfpublicgolf.com/LiteratureRetrieve.aspx?ID=65476>; Joe Faulkner letter, July 31, 2009 (true copy attached as Exhibit 26) <http://www.sfpublicgolf.com/LiteratureRetrieve.aspx?ID=66790>.

²⁹ Letter from golf architect Mike DeVries, November 18, 2009: <http://sfpublicgolf.com/LiteratureRetrieve.aspx?ID=43267> (True copy attached as Exhibit 27.)

³⁰ Ken Venturi, letter, October 12, 2009: <http://sfpublicgolf.com/LiteratureRetrieve.aspx?ID=40561> (A true copy is attached as Exhibit 28.)

³¹ Geoff Shackelford, "Sharply Divided," *supra*, (fn. 26) (copy attached as Exhibit 23).

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one of the few places in the world where MacKenzie's work is available for use and enjoyment by the general public.

For all these reasons, the San Francisco Public Golf Alliance and its more than 5,000 members, support the determination of the San Francisco Planning Department that the Sharp Park Golf Course is an "historical resource" under the California Environmental Quality Act.

II. SIGNIFICANT IMPACTS ON THE HISTORICAL RESOURCE

San Francisco Public Golf Alliance has not completed its analysis of the significance of the impacts of the Laguna Salada Restoration plan on the historical resource of the golf course. We will submit a separate letter with our comments on this.

However, we can at this time make the following preliminary statements:

02

1. We agree with the conclusion of the Planning Department that closure of Hole 12 would cause a significant impact to the historical resource.³²

03

2. We agree with the Planning Department's conclusion that, if Hole 12 is going to be lost, the preferred mitigation alternative would be restoration of one of MacKenzie's long-abandoned original holes west of Highway One and near the ocean.³³

04

3. We agree with the Planning Department's conclusion that shortening or narrowing Holes 10 and 13 would constitute significant impacts to the historical resource.³⁴ (We believe that "10" is a typographical error, and that the Department intends to say Hole 9; we are looking into this.) We believe that there are alternatives to these shortenings/narrowings that the Planning Department and the Department of Recreation and Parks have not yet considered; we will

³² Historic Resource Evaluation Response, supra (fn. 1), at p. 3 (A true copy is attached as Exhibit 1.)

³³ Id.

³⁴ Id.

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describe these alternatives in a subsequent letter.

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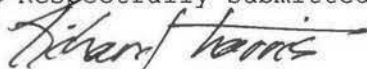
4. We disagree with the Department's conclusion that raising Holes 10, 14, 15, and 18 "would not cause a significant impact" on the historic resource.³⁵ Rather, we believe that raising these fairways, or portions of them, has the potential to cause significant impacts; if done properly, we suspect that a good restoration golf architect could design raised fairways, or portions thereof, that would not necessarily constitute significant impacts. We cannot determine this in the abstract, but only upon a review of specific architectural and site plans for such work.

06

5. We disagree with the Department's conclusion that new fencing along the berm and the border of the protected wildlife area would not constitute significant impact upon the historic resource.³⁶ Similarly to No. 4, above, we believe that fencing has potential to cause significant impacts; but if designed and located properly, it is possible that fencing might have less-than-significant impact. It depends upon the specific architectural plans and the exact location for this fencing; the plans and construction of the fencing should be done in conjunction with the golf restoration architect.

Thank you for considering our comments.

Respectfully submitted,



Richard Harris
San Francisco Public Golf Alliance

encls.

cc: San Francisco Historic Preservation Commission
Phil Ginsburg, General Manager, Recreation & Park Dept.
Mark Buell, President, Recreation & Park Commission
Dawn Kamalanathan, Recreation & Park Capital Division

³⁵ Id.

³⁶ Id.

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SAN FRANCISCO PLANNING DEPARTMENT

MEMO

Historic Resource Evaluation Response

MEA Planner: Jessica Range
Project Address: Significant Natural Resource Areas Management Plan:
 Sharp Park Golf Course, Pacifica
Block/Lot: N/A
Case No.: 2005.1912E
Date of Review: February 8, 2011
Planning Dept. Reviewer: Shelley Caltagirone
 (415) 558-6625 | shelly.caltagirone@sfgov.org

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 Information:**
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PROPOSED PROJECT

☐ Demolition

☒ Alteration

PROJECT DESCRIPTION

The project is the implementation of the San Francisco Recreation and Parks Department's Significant Natural Resource Areas Management Plan. The plan establishes goals and objectives for 32 Natural Areas, including Sharp Park Golf Course located in Pacifica. The specific goals and objectives are listed fully in Chapters 2 and 3 of the Sharp Park Golf Course Historical Resources Evaluation (HRE) report. In summary, the proposed project would convert about 19 acres of the golf course to Natural Area to facilitate restoration of the Laguna Salada and wildlife habitats associated with the property. Both the lagoon and pond would be excavated extensively and the dredge spoils would be used to raise Holes 10, 14, 15, and 18, creating upland habitat on the east edge of Laguna Salada. Thirteen acres of the golf course would be converted to upland habitat along the east side of the lagoon and would require that Holes 10 and 13 are slightly shortened or narrowed. A dispersal corridor between the lagoon and the pond would be constructed with upland features and would necessitate closing Hole 12 of the golf course. 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.

PRE-EXISTING HISTORIC RATING / SURVEY

The golf course and the clubhouse were separately designated as historic landmarks for the City of Pacifica in 2009. The property is not listed on the state or national registries. The property is considered a "Category A" (Known Historic Resource) property for the purposes of the Planning Department's California Environmental Quality Act (CEQA) review procedures.

HISTORIC DISTRICT / NEIGHBORHOOD CONTEXT

The 411-acre golf course is located in the town of Pacifica in San Mateo County. It borders the Pacific Ocean and is bisected by Highway 1. Thirteen fairways, the clubhouse, and Laguna Salada are located to the west of the highway, and the four remaining fairways are located to the east of the highway.

www.sfplanning.org

Historic Resource Evaluation Response
February 8, 2011

CASE NO. 2005.1912E
SNRAMP: Sharp Park Golf Course

1. **California Register Criteria of Significance:** A building may be an historical resource if it meets any of the California Register criteria listed below. If more information is needed to make such a determination please specify what information is needed. *(This determination for California Register Eligibility is made based on existing data and research provided to the Planning Department by the above named preparer / consultant and other parties. Key pages of report and a photograph of the subject building are attached.)*

Event: or ☒ Yes ☐ No ☐ Unable to determine
 Persons: or ☐ Yes ☒ No ☐ Unable to determine
 Architecture: or ☒ Yes ☐ No ☐ Unable to determine
 Information Potential: ☐ Further investigation recommended.
 District or Context: ☒ Yes, may contribute to a potential district or significant context.
 If yes, period of significance: 1929-1932

The Planning Department concurs with Tetra Tech's determination that the subject property appears to be eligible for listing on the California Register for its significance under Criteria 1 (Events) and 3 (Architecture). The golf course's development is associated with the broader event of the golden age of golf in the US and in California. The course is also an important example of a seaside golf course designed by a master landscape architect, Alister Mackenzie. Please refer to Section 5.2 of the HRE report for a full analysis of the resource's historical significance.

2. **Integrity** is the ability of a property to convey its significance. To be a resource for the purposes of CEQA, a property must not only be shown to be significant under the California Register criteria, but it also must have integrity. To retain historic integrity a property will always possess several, and usually most, of the aspects. The subject property has retained or lacks integrity from the period of significance noted above:

Location: ☒ Retains ☐ Lacks Setting: ☒ Retains ☐ Lacks
 Association: ☒ Retains ☐ Lacks Feeling: ☒ Retains ☐ Lacks
 Design: ☒ Retains ☐ Lacks Materials: ☒ Retains ☐ Lacks
 Workmanship: ☒ Retains ☐ Lacks

The resource retains sufficient integrity in all aspects of its character to convey its historical significance. Please refer to Section 5.3 of the HRE report for a full analysis of property's integrity.

3. **Determination** of whether the property is an "historical resource" for purposes of CEQA.

☐ No Resource Present (Go to 6 below.) ☒ Historical Resource Present (Continue to 4.)

4. If the property appears to be an historical resource, would the proposed project materially impair the resource (i.e. alter in an adverse manner those physical characteristics which justify the property's inclusion in any registry to which it belongs)?

Historic Resource Evaluation Response
February 8, 2011

CASE NO. 2005.1912E
SNRAMP: Sharp Park Golf Course

- ☐ The project would not cause a substantial adverse change in the significance of the resource such that the significance of the resource would be materially impaired. *(Continue to 5 if the project is an alteration.)*
- ☒ The project is a significant impact as proposed. *(Continue to 5 if the project is an alteration.)*

The Planning Department fully concurs with the impacts analysis provided by Tetra Tech in Section 5.4 of the HRE report. In summary:

Project Impacts:

- Raising Holes 10, 14, 15, and 18 *would not cause a significant impact* on the character-defining features of the golf course and the holes would remain in their original locations and the visual character of their fairways would only be minimally affected.
- The closure of Hole 12 *would cause a significant impact* to the historic resource as the work would eliminate an original hole and fairway on the west side of the course. Its removal would significantly alter the original golf course design and boundaries.
- The proposed fencing would add a modern element to the golf course but would not harm the character or setting of the resource. This addition to the landscape *would not cause a significant impact* to the historic resource.
- Modifying approximately 13 acres of the golf course to create upland habitat along the east side of the lagoon would require slightly shortening or narrowing Holes 10 and 13. This alteration would significantly alter the character of these original fairways. Therefore, the work *would cause a significant impact* to the historic resource.

Alternative Project Impacts:

- The recreation analysis of the SNRAMP EIR proposes a mitigation measure (Option 1) that would create a new hole on the east side of Highway 1 as a replacement for Hole 12. This would result in a total of 13 holes on the west side of the highway and five holes on the east side. This arrangement would not maintain the historic balance of holes on either side of the highway and would change the historic boundaries of the course. This *would cause a significant impact* to the original design of the historic resource.
- The recreation analysis of the SNRAMP EIR proposes a mitigation measure (Option 2) that would create a new hole on the west side of Highway 1 as a replacement for Hole 12. While the mitigation measure would change the layout of the holes, this alternative mitigation measure would restore some of the elements that Mackenzie had implemented in his original design by placing the new holes in areas of the course where holes were historically placed. The proposed holes would also be in keeping with the historic boundaries of the golf course. Because of the restorative aspect of the work, this mitigation *would cause a less than significant impact* to the resource.

The project would result in significant impacts to several character-defining features of the golf course, including Holes 10, 12, and 13.

Historic Resource Evaluation Response
February 8, 2011

CASE NO. 2005.1912E
SNRAMP: Sharp Park Golf Course

5. Character-defining features of the building to be retained or respected in order to avoid a significant adverse effect by the project, presently or cumulatively, as modifications to the project to reduce or avoid impacts. Please recommend conditions of approval that may be desirable to mitigate the project's adverse effects.

The character-defining features of the property are:

- The original features and design of the clubhouse;
- The original features and design of the permanent maintenance building; and,
- The original features and design of the golf course, including the 12 original holes (current holes 1, 2, 3, 8, 9, 10, 11, 13, 14, 15, 17, and 18), the original landscape features, and the cypress tree plantings that line the fairways.

Documentation of the historic cultural landscape by a qualified architectural historian should be completed before the commencement of any landscape alterations, as described in Chapter 6 of the HRE report. However, documentation of the resource will not mitigate the impacts of the project to Holes 10, 12, and 13 to a less than significant level.

6. Would the proposed project have an adverse effect on off-site historical resources, such as adjacent historic properties?

☐ Yes ☒ No ☐ Unable to determine

There are no identified off-site historical resources that would be affected by the project.

SENIOR PRESERVATION PLANNER REVIEW

Signature: *Tina Tam*
Tina Tam, Senior Preservation Planner

Date: 2/15/2011

cc: Linda Avery, Recording Secretary, Historic Preservation Commission
Vimaliza Byrd / Historic Resource Impact Review File

SC: G:\DOCUMENTS\Cases\CEQA\EIR\Significant Natural Resource Areas Management Plan\Sharp Park Golf Course_HRER.doc

**CITY OF PACIFICA
GENERAL PLAN**

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GENERAL PLAN
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INTRODUCTION

The 1980 General Plan for the City of Pacifica represents a major review of planning options for the City. In developing this plan, the nine mandatory elements were considered, including: land use, circulation, scenic highways, housing, noise, conservation, open space, seismic safety and safety. In addition, community facilities, history and community design also were considered. The Policy Plan contains the recommendations of each element. The Land Use Plan represents the conclusion of the interaction among these element studies. Findings of each element are included in the Plan document so that persons using the Plan are aware of the major influences of each of these subject areas.

The General Plan program in Pacifica also included preparation of a Local Coastal Land Use and Implementation Plan (LCP). Conclusions of the Coastal Land Use Plan are included in the General Plan Report as proposed land use for the area west of Highway 1, which has been designated by State law as the Coastal Zone. These land use descriptions are more detailed and oriented specifically to Coastal Act policies. Consistent with the intent of the 1976 Coastal Act, planning in the Coastal Zone includes more detailed recommendations than are required of general plans.

Requirements of the Coastal Act, including procedures for implementation, amendment and action, make it advisable to present the Coastal Plan in a separate report which will be certified by the State Coastal Commission as Pacifica's Coastal Plan. In terms of State Planning Law, the Coastal Plan may be considered a Special Area Plan as provided in Section 65450 of the State Government Code. The recommendations of the Coastal Land Use Plan are consistent with those of the 1980 General Plan and for this reason, the land use portion of the Coastal Land Use Plan is included for purposes of environmental impact review.

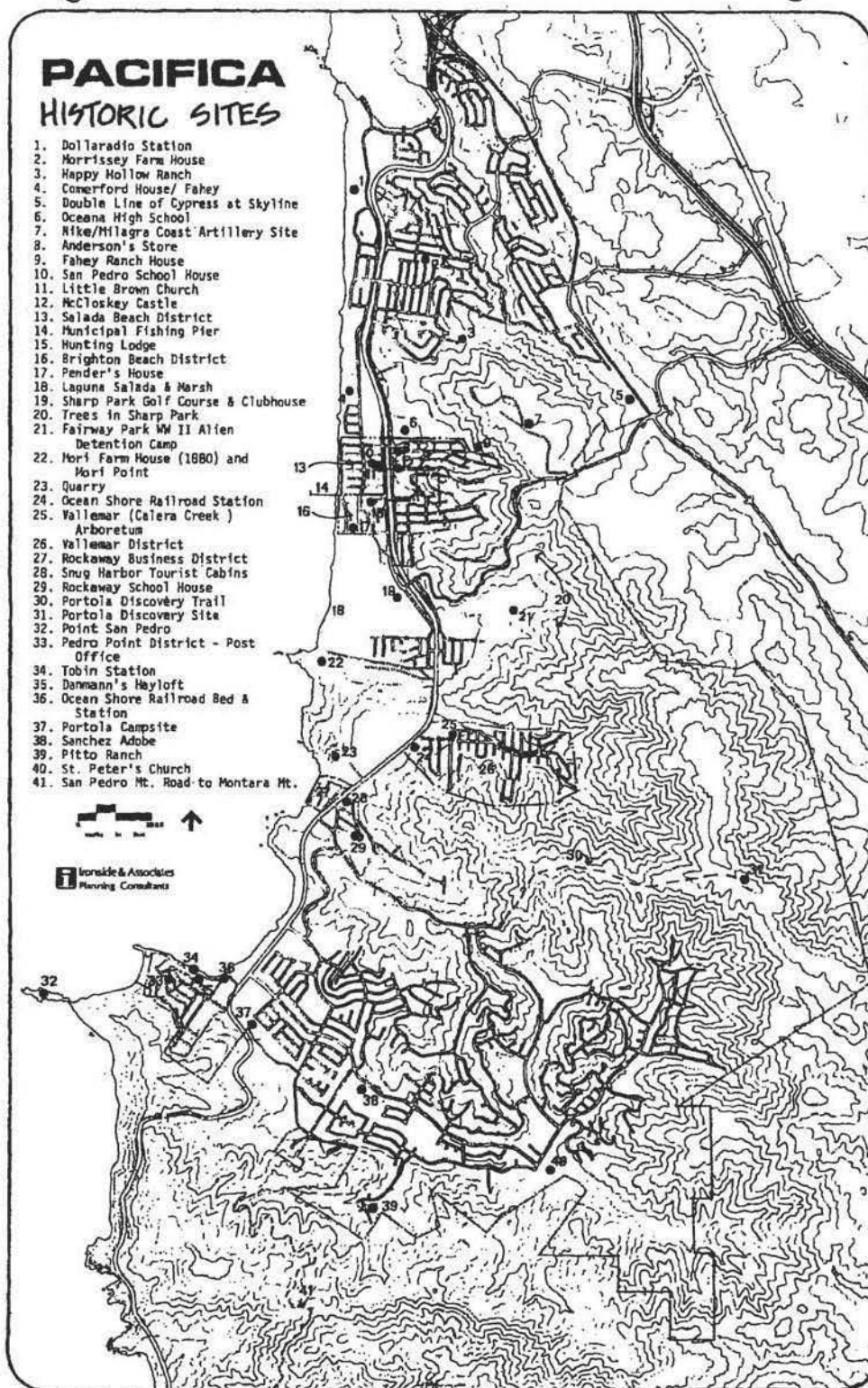
HISTORIC PRESERVATION ELEMENT

The Historic Preservation Element of Pacifica's General Plan was prepared by a group of knowledgeable citizens who volunteered, out of their concern for conserving remnants of Pacifica's past, to add depth to the human experience today and in the future. The element includes a list and map of all of the sites and structures felt to be of historic significance in Pacifica.

The element would be implemented by an Historic Ordinance which would establish a Pacifica Historic Sites Advisory Committee to review proposed changes to sites and structures designated on the Historic Sites Map and advise the Planning Commission and City Council of the appropriateness of the proposal. The Committee would also spearhead local civic activity, such as local history programs for schools and civic organizations, seeking funding for historic conservation projects, and seeking assistance for further documentation on the Historic Sites list.

The Historic Element text is also published separately so that it may be used by those who participated in its creation to seek funding for additional planning conservation activities, as well as for promoting educational and civic awareness of Pacifica's colorful past.

- OE -



AMENDING THE GENERAL PLAN

Pacifica's 1980 General Plan revision incorporates two planning processes: a major update of the General Plan and preparation of the City's Local Coastal Land Use and Implementation Plans. In dealing with the General Plan on a day-to-day basis, these two plans should be treated as one; however, the distinction between them must be recognized. The City Council has the ultimate authority in adopting and amending the General Plan. State law (Government Code Section 65361) permits the City to amend its General Plan no more than three times a year. In years of major revision, the adoption of the revised plan is considered one of these three permitted annual amendments.

On the other hand, the Council can recommend changes in the Coastal Plan, but the amendment must be approved by the State Coastal Commission. The approval procedure has not yet been established by the State Coastal Commission and must be embodied into official regulations.

The 1976 Coastal Act does state that minor amendments to a certified plan may be reviewed by the Executive Director and become operative in ten days. However no changes in land use shall be determined to be minor amendments (Article 30514(c)). The Act also states that amendment includes:

.....any action by the local government which authorizes a use of a parcel of land other than that designated in the certified local coastal program as a permitted use of that parcel..... (30514(d)).

Revisions to the Coastal Land Use Plan document would require State Coastal Commission approval for amendment. These include:

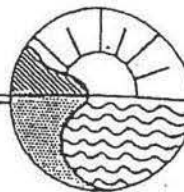
- Policies indicated as being part of the Coastal Element,
 - The Coastal Zone Land Use Plan Description,
 - The portion of the Land Use Map west of Highway 1,
 - The Coastal Zone Element, including the Access Component, Plan Conclusions, Implementation Plan and Ordinance revisions required as a part of coastal plan implementation.
- (This document is available under a separate cover).

ADOPTION

On April 30, 1979, the Planning Commission recommended that the City Council certify the Environmental Impact Report and adopt the proposed Pacifica General Plan. On July 14, 1980, the City Council certified the Environmental Impact Report and adopted the General Plan on July 28, 1980.

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AGENDA



Planning Commission – City of Pacifica

DATE: September 8, 2009
LOCATION: Council Chambers, 2212 Beach Boulevard
TIME: 7:00 PM

ROLL CALL:

SALUTE TO FLAG:

ADMINISTRATIVE BUSINESS:

Approval of Order of Agenda

Approval of Minutes: August 17, 2009

Designation of Liaison to City Council Meeting of: September 14, 2009

CONSENT ITEMS:

PUBLIC HEARINGS:

1. HLD-06-09 HISTORIC LANDMARK DESIGNATION, filed by the applicant, City of Pacifica, to designate Sharp Park Golf Course as an Historic Landmark (APN's 016-430-020 & 016-441-020) Recommended CEQA status: Exempt. Proposed Action: Table to a date uncertain (Continued from August 17, 2009)
2. UP-006-09
PV-500-09 USE PERMIT and VARIANCE, filed by the agent, Chamel James, on behalf of the applicant, Verizon Wireless, and the owner, City of Pacifica, to extend an existing police station monopole and add nine wireless communications antennas, two GPS antennas and related equipment at 2075 Coast Highway, Pacifica (Assessor's Parcel Number 018-051-050). Recommended CEQA status: Exempt. Proposed action: Approval as conditioned (Continued from August 17, 2009)
3. CDP-316-09 COASTAL DEVELOPMENT PERMIT, filed by the owner and applicant, Penny Keating of the Shoreside Residents Association, to legalize an existing chain link fence along Shoreside Drive, Pacifica (APN 023-730-200). The project is located in the Coastal Zone. Recommended CEQA status: Exempt. Proposed action: Approval as conditioned

OTHER AGENDA ITEMS:

COMMUNICATIONS:

Commission Communications:

Staff Communications:

Oral Communications:

This portion of the agenda is available to the public to address the Planning Commission on any issue within the subject matter jurisdiction of the Commission that is not on the agenda. The time allowed for any speaker will be three minutes.

ADJOURNMENT

Anyone aggrieved by the action of the Planning Commission has 10 calendar days to appeal the decision in writing to the City Council. If any of the above actions are challenged in court, issues which may be raised are limited to those raised at the public hearing or in written correspondence delivered to the City at, or prior to, the public hearing. Judicial review of any City administrative decision may be had only if a petition is filed with the court not later than the 90th day following the date upon which the decision becomes final. Judicial review of environmental determinations may be subject to a shorter time period for litigation, in certain cases 30 days following the date of final decision.

The City of Pacifica will provide special assistance for disabled citizens upon at least 24-hour advance notice to the City Manager's office (738-7301). If you need sign language assistance or written material printed in a larger font or taped, advance notice is necessary. All meeting rooms are accessible to the disabled.

NOTE: Off-street parking is allowed by permit for attendance at official public meetings. Vehicles parked without permits are subject to citation. You should obtain a permit from the rack in the lobby and place it on the dashboard of your vehicle in such a manner as is visible to law enforcement personnel.

MINUTES

**CITY OF PACIFICA
PLANNING COMMISSION
COUNCIL CHAMBERS
2212 BEACH BOULEVARD**

September 8, 2009

7:00 p.m.

Chair Nathanson called the meeting to order at 7:00 p.m.

ROLL CALL: Present: Commissioners Evans, Langille, Clifford,
Campbell, Gordon, Leon, and Chair Nathanson
Absent: None

SALUTE TO FLAG: Led by Commissioner Clifford

STAFF PRESENT: Planning Director Michael Crabtree
Assistant Planner Kathryn Farbstein
Planning Intern Lily Lim

**APPROVAL OF ORDER
OF AGENDA** Commissioner Clifford moved approval of the Order
of Agenda; Commissioner Langille seconded the
motion.

The motion carried 7-0.

Ayes: Commissioners Evans, Langille, Clifford, Campbell,
Gordon, Leon, and Chair Nathanson
Noes: None

**APPROVAL OF
MINUTES:** Commissioner Clifford moved approval of the
minutes of August 17, 2009; Commissioner Leon
August 17, 2009 seconded the motion.

Commissioner Leon stated that he had a minor typo correction on page 14, second line, changing
~~"... to confirm were everything was ..."~~ to ~~"... to confirm where everything was"~~

The motion carried 7-0.

Ayes: Commissioners Evans, Langille, Clifford, Campbell,
Gordon, Leon, and Chair Nathanson
Noes: None

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DESIGNATION OF LIAISON TO CITY COUNCIL MEETING OF SEPTEMBER 14, 2009:

Planning Director Crabtree stated that the City Council would be considering the Development Plan for the single family residence on Perez Drive which the Commission had recently approved.

Commissioner Clifford volunteered to attend at the Planning Commission liaison.

CONSENT ITEMS:

None.

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PUBLIC HEARINGS:

- 1. HLD-06-09 HISTORIC LANDMARK DESIGNATION**, filed by the applicant, City of Pacifica, to designate Sharp Park Golf Course as an Historic Landmark (APN's 016-430-020 & 016-441-020). Recommended CEQA status: Exempt.

Planning Director Crabtree presented the staff report.

Commissioner Clifford asked how tabling affected San Francisco's report, such as encouraging, discouraging, etc.

Planning Director Crabtree felt it didn't have any impact on San Francisco's action regarding the studies. Although he acknowledged that it might do something to San Francisco internally, he reiterated that he wasn't aware of any impact.

Commissioner Leon stated that he had received many messages urging them to save the golf course, and he was asking for clarification that the issue before them was dealing with the historical preservation issue based on Pacifica's standards.

Planning Director Crabtree reiterated that the issue was whether or not to designate the golf course as an historical landmark based on Pacifica's ordinance criteria.

Commissioner Clifford thought that the golf course was already listed in the General Plan as an historic site and asked staff for confirmation of that.

Planning Director Crabtree responded affirmatively.

Commissioner Langille wasn't aware that it was listed in the General Plan and thought it was a matter of semantics. She asked what the effect of it was by being listed in the General Plan regarding protection of the golf course.

Planning Director Crabtree stated that the General Plan identified sites and the next step was to designate, via the zoning ordinance, the various sites as landmarks provided they met the criteria, and he thought the City had designated six sites as landmarks. When the landmark designation was imposed, there were various criteria that one goes through to alter or change the landmark and raises the level of CEQA analysis if designated as a landmark as opposed to being listed as a historic site.

Commissioner Langille asked what the impact was when an item was tabled, such as whether it was appeal-able or was put in a limbo.

Planning Director Crabtree thought it was closer to limbo, explaining that the impact of tabling merely put off the action and caused the City to take the initiative and re-notice it to everyone who indicated any interest and reopen the public hearing. He added that it was almost like starting over except they would have all the background of previous discussion and previous minutes.

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Commissioner Clifford asked if staff stood by its original recommendation in the July 20, 2009 staff report which asserted that the golf course deserved historical landmark status.

Planning Director Crabtree clarified that their recommendation on July 20 was that the Commission adopt the resolution recommending landmark status because their analysis felt it met the criteria and that has not changed. Staff still believed that the golf course has met the criteria, but their recommendation has changed for the present and they were now recommending that it be tabled.

Commissioner Evans asked if it made any difference if they tabled the item or voted on it in regard to the EIR report.

Planning Director Crabtree stated that, if he was asking if the analysis being done by San Francisco was affected by the City's decision, he had not heard from San Francisco that their analysis was dependent on anything Pacifica did. However, he couldn't state with certainty whether what they do may or may not have an impact on San Francisco's process. He stated that one would hope that San Francisco would take into account the action of the City in which their property was located. He thought the study they were conducting was a factual one and he didn't believe that anything Pacifica does or does not do would have an impact on the facts, but how the facts were analyzed and used may be influenced by Pacifica's action.

Commissioner Evans thought the gist of their letter referred to that fact by suggesting that the City not make the determination so they can go forward with their report without it being affected.

Planning Director Crabtree thought the letter might be interpreted in different ways, and that was one possible interpretation.

Commissioner Langille stated that the golf course was listed in the General Plan as an historical resource to the City, and under the zoning requirements, if made an historical landmark, any modifications to the historical aspect of the golf course would require a permit from the Planning Commission. She referred to their opinion, as well as her opinion following her research, that San Francisco didn't have to comply with Pacifica's zoning. She asked if the City had a different opinion or were in agreement.

Planning Director Crabtree didn't think the City Attorney had issued a formal opinion on that. He added that, when she attended the previous meeting, she felt there was the possibility that San Francisco would be immune from our local land use regulations, but hadn't formalized that.

Commissioner Langille asked confirmation that, in the past, San Francisco had not come before them for permits to modify the clubhouse.

Planning Director Crabtree stated that he could not find any evidence of that.

Commissioner Leon stated that he had communications with the Planning Director and, for the record, he recalled a number of improvements done, such as the paving for motorized golf carts, and he had asked if any permits were taken and there was no evidence found to indicate that they were taken. He reiterated his belief that there have been substantial improvements made without permits from Pacifica. He asked if the Planning Director had any more information to add.

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Planning Director Crabtree responded that all their research had concluded that they were not aware of any Planning permits being taken out for those specific tasks. He added that it was possible that a permit was acquired. He couldn't state with certainty that it wasn't but there was no evidence to prove that it was.

Commissioner Clifford stated that he had some information from San Francisco's Planning Commission meeting of August 17 regarding immunity which would partially answer Commissioner Langille's question. San Francisco Deputy City Attorney Stacy responded to San Francisco Commissioner Moore, referring to issues of intergovernmental immunity. She informed him that it was an issue that would be addressed for each situation, depending on the facts, use of the property, and local regulations. Commissioner Clifford felt it was clear that San Francisco wasn't certain that they had full immunity regarding the site.

Commissioner Gordon referred to Commissioners Langille's and Clifford's comments, stating that, if they designated the golf course as historic, then San Francisco would have to come before the Planning Commission before they made modifications but, if they had intergovernmental immunity from Pacifica's zoning ordinances, it didn't matter what Pacifica said with respect to historic designation because they weren't tying San Francisco's hands. He did feel that what they were doing was symbolic and whether their decision had legal teeth or was symbolic was important. He felt that, if they tabled it, when it came back it would be relevant if the City Attorney gave them some information about her view on whether San Francisco had intergovernmental immunity. He then referred to the letter from San Francisco's Deputy City Attorney which he felt said that they had immunity from Pacifica's ordinances and passing this designation would not matter one bit to them. He felt it was valuable to have our City Attorney's input on this legal issue when it returns.

Planning Director Crabtree thought Commissioner Gordon's points were excellent, adding that the City Attorney was planning to be present at this meeting but, when staff recommended tabling the item, she assumed that they would table it and she decided to wait until they actually reconsidered the item before addressing them.

Commissioner Leon referred to all the changes made at the golf course over the past 20 years, which were done without permits, and he felt it made no sense for people to take time out of their schedules to come and speak when the Planning Commission was considering legislating something that was not able to be enforced. He didn't see the point of that.

Chair Nathanson thought they were getting a little off track at this point unless they had a direct question for staff.

Commissioner Campbell asked, on following up on Commissioner Gordon's excellent recommendation, whether they could ask the City Council to task the City Attorney with this notion of determining the legalities associated with designating the course as historic.

Planning Director Crabtree felt that was not necessary. He stated that the City Attorney was prepared to give the Commission the advice they needed to move forward on this, and he didn't feel that there was a need to ask the City Council to direct her to do it. It was her job and she was present previously and gave them her opinion. She now had the letter from San Francisco and he acknowledged that the Commission would like her to respond to that letter. He assured them that,

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should they table the matter, she would be present when it was presented to them again and provide them with the advice that they need. (

Commissioner Campbell was merely asking for assurance that the followup would be there.

Chair Nathanson reiterated, for the benefit of the public, why they were not having a public hearing on this item at this time, explaining that they had the initial presentation with a very lengthy public hearing where everyone had spoken, closed the public hearing for Commission deliberation but it was so late that they continued it and stated that, when it came before them again they would go directly to Commission deliberations. She further explained that, if they now table the item, it would go to square one and be re-noticed, with a public hearing and after their deliberations and decision, it would go on to City Council and there would be another public hearing. She reassured the public that there would be ample opportunity for them to speak in front of the Commission and the City Council. She also reminded the public that, on any issue, they had the option of writing to the Commission or Council, were not limited to three minutes, and it would be included with their packet with ample time to deliberate on it. She again reiterated that not having a public hearing at this meeting was not because they were trying to shut them out.

Commissioner Clifford was not happy with tabling the item, and would like to finish the deliberations and send it on. He felt that this was an item that needed to go before the City Council so they can open the public hearing. He didn't see anything to be gained by tabling it, re-noticing it, and opening the public hearing again, since it was ultimately up to the City Council to make the determination. (

Chair Nathanson asked clarification that the only thing they were considering was whether or not Sharp Park Golf Course met the criteria as an historical landmark. She thought all the other information would be before the City Council. She thought their only option was to table it while waiting for San Francisco's report and their agenda item was only whether or not it should be an historic landmark.

Commissioner Gordon disagreed with Commissioner Clifford. He would like as much information as possible on the subject before him before making a decision. He referred to San Francisco's letter to Pacifica, stating that they appreciated the historic and cultural value of the golf course and the effects of the resource management plan on the golf course as a potential historic resource and that fact would be included in their EIR report. He would like to wait and see what they have to say so that he can make a better decision. He mentioned that the last time it was on an evening where the agenda was full, and if they table it, he would like to see it as the only agenda item so no one has to stay until 12:30 again. He was in favor of tabling it.

Commissioner Evans was in agreement with Commissioner Gordon. He had originally stated that he didn't feel right without having input from the owner of the property. He stated that, if they were in the middle of an extensive report, the Commission owed it to both the golf course and Pacifica to wait for that report. He did understand Commissioner Clifford's position about moving on, but he felt they should wait and have everything in front of them.

Commissioner Leon also felt that they should have as much information as possible before them so that they do not send less than fully developed deliberation and information to the City Council. He felt it was their responsibility and he would like that opportunity as a Commissioner. (

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Commissioner Leon referred to the letter from San Francisco, which he felt clearly stated their legal responsibilities and their interest in preserving the golf course, as well as their significant natural resources area management plan and their intention of complying with CEQA regulations and Fish & Game regulations. He felt it was beneficial to wait. He mentioned the National Park Services' offer to intervene in the historic study to look at state and national historic criteria, which was a higher standard. He felt that was potentially still on the table for the future, but based on what San Francisco was doing and committed to, he agreed with tabling the item.

Commissioner Langille referred to her position regarding intergovernmental immunity but she was trying to be a responsible open-minded Commissioner. She acknowledged that they had heard from the City Attorney previously but they had not heard her response to the latest letter. She also felt that giving San Francisco time to complete their studies would give them beneficial information, stating that she was in favor of tabling it.

Commissioner Campbell stated that, whether or not intergovernmental immunity applies, he was most interested in whether the golf course met the criteria of the City's historic designation ordinance, and their decision would be informed by San Francisco's study. He thought that, if it were a private developer on private land who told them they would have more to tell them about the history of the site in a month, they would wait. He didn't see the distinction with this property. He would like to vote to table it, but he was not interested in waiting around forever. He wondered if there was a way to put a time limit or if the Planning Department's expectations were for getting something back by the end of October. He thought if they didn't produce the report by the end of October, he would conclude that it was fair to move forward.

Planning Director Crabtree explained that, when tabling an item, there was a re-noticing process and he would prefer not to create an expectation of a date. He was also hesitant because of knowing how things can be planned for a certain date and then get pushed back. He recommended that they not make it part of their motion but rather direct the Planning Director to report to them on the status. He added that, if they didn't hear anything by the end of October, they could ask him to give them a report.

Chair Nathanson stated that one reason she was in favor of tabling it was because the report on line and available to people was that staff was recommending that it be tabled. She thought they would have had more people present if they thought that was not going to be the case. She also felt there were some legal issues and, when they have a clearer perspective on San Francisco's situation, the City Attorney would be present to address them. She didn't think they had to worry about something drastic happening if they tabled the item. She felt it was in everyone's best interest to table it. It would also provide the opportunity for reopening the public hearing.

Planning Director Crabtree then elaborated on his previous response, further clarifying that the Commission always had the right to say they would like to hear the item. If they decided that it was too long to wait, or San Francisco's study didn't get completed, they always had the option to ask that it be put on the agenda.

Commissioner Clifford asked staff what the process would be for that request should it be November or December. He asked if it should be during Commissioner Communications.

Planning Director Crabtree agreed that it would be appropriate to ask, during Commissioner Communication, that the item be placed on their agenda.

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Commissioner Leon asked clarification as to whether they should add the reference regarding subject to updates by the Planning Director into the motion as discussed by Commissioner Campbell.

Commissioner Campbell stated that he was satisfied with the motion as it was.

Commissioner Leon moved that the Planning Commission **TABLE** consideration of HLD-06-09 to a date uncertain; Commissioner Campbell seconded the motion.

The motion carried 7-0.

Ayes: Commissioners Evans, Langille, Clifford, Campbell,
Gordon, Leon, and Chair Nathanson
Noes: None

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2. UP-006-09 USE PERMIT and VARIANCE, filed by the agent, Charnel
 PV-500-09 James, on behalf of the applicant, Verizon Wireless, and the
 owner, City of Pacifica, to extend an existing police station
 monopole and add nine wireless communication antennas, two
 GPS antennas and related equipment at 2075 Coast Highway,
 Pacifica (APN 018-051-050). Recommended CEQA status:
 Exempt.

Planning Intern Lim presented the staff report.

Commissioner Campbell asked if the school board was notified of this action.

Planning Intern Lim stated that it was the adjacent property, and she was pretty sure they had been notified as everyone within 300 feet would have been notified.

Commissioner Campbell asked if the notice went to the school district's Superintendent or actually to the Board.

Planning Intern Lim stated that it went to the owner of the property.

Commissioner Campbell was merely wondering who actually gets it.

Planning Intern Lim stated that it goes to the School District office.

Commissioner Leon asked if there were any other public or privately situated antennas that would add to any cumulative effects from this proposal.

Planning Intern Lim stated that there were existing antennas used by the police station.

Commissioner Leon thought they had approved something at the Pacific Telephone but didn't know if it was a pole or not, because he didn't have the antenna map for reference.

Planning Intern Lim stated that the RF report only had information on the cumulative effect of what was being added to the pole.

Commissioner Leon asked if the information was available with a reference map of existing poles.

Planning Director Crabtree stated that he wasn't sure what he was asking, explaining that there was another antenna at the telephone building, and thought it was the only other one in the vicinity, although the applicant may be able to respond further. He reiterated what was already stated, that the RF report did not take into account surrounding antennas, only the one on the facility.

Commissioner Leon asked if he was stating that there was one on the telephone building.

Planning Director Crabtree stated that there was one approved but he didn't know if it was actually installed. He asked Planning Intern Lim if she knew.

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Planning Intern Lim acknowledged that they had approved one at 325 Reina del Mar but had no further information.

Planning Director Crabtree reiterated that they didn't know for sure if it was actually installed.

Commissioner Leon thought that the water department had one on the lower part of Cattle Hill which faces Vallemar.

Planning Director Crabtree stated that they would have to get the map to check.

Commissioner Evans referred to the RF report which stated that the new antenna would only pose 3.6% of the applicable public exposure limit allowable, and he asked if it was only for the new antenna.

Planning Intern Lim stated that was referring only to what they were now proposing.

Commissioner Langille acknowledged that she needed to stay away from public safety issues, but she questioned the cumulative effect with antennas near a school such as this one, and wondered how many antennas were in the area. She asked if there was any information on how many antennas near a school caused concern.

Planning Director Crabtree thought the applicant might be able to answer that, but he cautioned her that she could not take health issues into account when considering approval of the permits.

Commissioner Clifford asked Planning Intern Lim if she was able to get an answer about whether there would be any interference from these antennas to the public safety system that the police operate. His major concern was, during an emergency situation when everyone was on their cell phones and the antennas were maxed out, what would happen to the police communications.

Planning Intern Lim mentioned that the applicant stated that they ran on different frequencies, but she was present and could confirm that.

Commissioner Clifford assumed that she would be able to answer the question for him.

Chanel James, NSA Wireless, stated that she was representing Verizon. She stated that she had her RF engineer, Russ Benson, present and he would be available to answer any questions about the radio frequencies and how the antennas work. She felt staff did a good presentation and she was present mainly to answer any questions. She did mention the reference in the staff report to equipment, and clarified that there were multiple radio cabinets within the shelter.

Commissioner Clifford asked if her RF man would answer his previous question.

Russ Benson, radio engineer, was with Verizon with 48 years in the industry. He stated that he was responsible for everything from the Golden Gate Bridge to south of Gilroy on the west side of the bay. He stated that Verizon was more concerned about interference to their system from the police radios. He stated that RFs would normally show the probability of interference from police radios into their equipment was 100 times greater than any interference from their equipment to the Police Department.

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Commissioner Clifford asked if they could get that in writing.

Mr. Benson stated that he thought they had already submitted something in writing saying that there was no chance of interference.

Commissioner Clifford stated that he didn't see it in their packets.

Planning Intern Lim stated that they had e-mailed the City stating that they were on different frequencies, and she would place it in the file.

Commissioner Clifford was merely ensuring that it was on record and public safety was clearly addressed.

Mr. Benson stated that this was for the frequencies currently being used by the Police Department but, if they changed to another range of frequencies at a later date, it would have to be restudied.

Commissioner Clifford thanked him for the information, adding that they would keep that in mind.

Planning Director Crabtree added that it was not being done in a vacuum. Verizon had been working with the Police Department from the very beginning, and the police had not expressed any concerns to the Planning Department.

Ms. James pointed out that their lease had already been in front of the City Council and the Council had approved their lease.

Commissioner Leon stated that he was trying to arrive at information regarding cumulative exposure, having approved an antenna on a commercial building adjacent to the school and adjacent to the Police Department. He asked if there was a concern regarding the equipment Verizon was planning to add.

Mr. Benson stated that they had submitted a Hammon and Edison report to the City which covered everything on the tower. He stated that once they step away from the tower by more than 10 meters, there was no chance of anything. He stated that the antenna at the AT&T facility, which was about 800 feet away, would add less than 1/10 of 1% of the public exposure limit and was so low it could not be measured with current instruments being used.

Chair Nathanson opened the Public Hearing and, seeing no one, closed the Public Hearing.

Commissioner Clifford moved that the Planning Commission find the project exempt from CEQA, and **APPROVE** Use Permit, UP-006-09 and Variance, PV-500-09, subject to conditions 1 through 7 and **ADOPT** findings contained in the September 8, 2009 staff report, and incorporate all maps and testimony into the record by reference; Commissioner Evans seconded the motion.

Chair Nathanson stated that she loved when she got before and after photos, and thanked them for a moment of happiness. She then suggested that they get an I-phone with Verizon.

The motion carried 7-0.

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Ayes: Commissioners Evans, Langille, Clifford, Campbell,
Gordon, Leon, and Chair Nathanson
Noes: None

Chair Nathanson declared that anyone aggrieved by the action of the Planning Commission has ten (10) calendar days to appeal the decision in writing to the City Council.

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3. CDP-316-09 COASTAL DEVELOPMENT PERMIT, filed by the owner and applicant, Penny Keating of the Shoreside Residents Association, to legalize an existing chain link fence along Shoreside Drive, Pacifica (APN 023-730-200). The project is located in the Coastal Zone. Recommended CEQA status: Exempt.

Assistant Planner Farbstein presented the staff report.

Commissioner Clifford asked when the fence was put up.

Assistant Planner Farbstein didn't know, adding that the applicant could probably better address that. She stated that code enforcement was involved and she could tell him when she got the application.

Commissioner Clifford stated that he was more interested in how long the fence was there.

Commissioner Campbell referred to condition 2 which stated that the applicant shall landscape along the fence with year-round plants to the satisfaction of the Planning Director and asked on which side of the fence they would plant or whether it might be both sides.

Assistant Planner Farbstein stated that she envisioned the plants on the one side away from the ocean to better maintain them, adding that she would prefer that no one go on the Oceanside.

Penny Keating, applicant, was representing Shoreside Residents Association, and explained how the residents bought their respective units in 2001. She referred to the uniqueness of the area, with its own concerns and considerations because of the public access. She felt the staff report was good and the Commission had most of the information they needed. She referred to the question about when the fence was installed, and thought it was installed in January 2009. She stated that a neighbor had suggested that the fence would be more aesthetically pleasing in black. They were told it couldn't be painted but they could add a plastic coating. She was pleased with the positive response from the neighbors in the community by their letters of support. She then read one letter from a surfer. She mentioned some of the accidents which occurred in the past and felt they were doing the best they could by installing a fence that would allow for visibility of the ocean while ensuring safety.

Commissioner Evans asked when the Police Department had talked to them about erecting the fence.

Ms. Keating stated that she hadn't spoken to the police officer but it was an unofficial comment and she had given that comment to Assistant Planner Farbstein unofficially, adding that it was shortly before they installed the fence. They had been having problems with vandalism, etc., and she didn't know if the other owner had called the police out because of that. She reiterated that it wasn't an official statement.

Commissioner Campbell felt the fence was a good idea which would be of benefit to the neighborhood. He asked if there was a way of placing vegetation on the ocean side that can be watered in order to shield it from below so that no one was looking at a fence. He didn't know if he was making a mountain out of a molehill but asked if there was a way to screen the fence.

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Ms. Keating stated that they had discussed landscaping and they had a concern about the problem of getting water in terms of erosion and the mechanics of getting it out there. They were also concerned about blocking the view. There was also the fact that it was hard but they were willing to give it a try. She mentioned the fact that they naturally have green plants by March, then daisies by April. The plants last until July and then die off, and the owners felt it was a natural way of handling it but they were willing to comply with whatever was the best solution.

Commissioner Clifford initially thought the black vinyl was a good idea until his site visit. He saw that it was flaking off and he was thinking that it shouldn't be renewed because they would land up with the vinyl in the ocean.

Ms. Keating agreed with him. She only notice it recently, but wasn't sure how long it had been deteriorating. She was sorry that it was a mess when he made the site visit, but thought it was good for him to see that. She felt the fence had helped eliminate some of the litter.

Chair Nathanson asked if they had given any consideration to a more viable alternative to the vinyl.

Ms. Keating stated that they hadn't thought of doing anything to the fence unless something happened to make it unsafe. The vinyl was meant as an aesthetic addition, and there was some comment about whether it was better black or better the natural chain link coloration. She didn't think there was any thought of replacing it unless a safety issue came up.

Chair Nathanson opened the Public Hearing and, seeing no one, closed the Public Hearing.

Commissioner Langille had visited the site before it was an agenda item, and she felt the fence was an improvement, not only for the safety of pets and humans, but for keeping litter from going over the edge. She thought it would be difficult to put planting on the ocean side and they would probably have to be seasonal to avoid erosion by watering. She agreed that something like native planting placed to shield the fence was great and was a necessary recommendation. She understood why they went with a black fence but she felt letting it deteriorate and then letting it go was probably the best way to go. She stated that she had looked at the fence from the beach and thought it was hard to see. She recommended approving it.

Commissioner Leon supported the legalization of the fence, and the safety concerns were well taken. He thought the best idea was native plants that required no watering with the seasons dictating what grows. He felt the pictures were scary, with the natural condition and susceptibility to erosion, and keeping water off of it was the best way to go.

Commissioner Evans was also in favor of the fence. However, he was not in favor of adding plants that needed to be watered. He felt the natural idea was much better and anything to preserve the cliffs was a plus. He didn't think digging holes and watering them was a good idea at the cliff's edge. He was in favor of letting it go to nature, since it doesn't need watering and we will be saving water. He added that it probably wouldn't be too long before the fence was in the ocean. He reiterated that he was in favor of the fence but not of adding the plants.

Commissioner Campbell was in favor of the fence and was not in favor of non-native plants, but was in favor of initial watering just to get them started. He did appreciate Commissioner Langille for taking a look at it.

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Commissioner Gordon was in favor of the legalization of the fence, but on condition #2, he would like to specify that the applicant would landscape along the fence with native drought tolerant plants that grow year round. He hadn't visited the site but, if planting native plants on the ocean side would contribute to the erosion, he would consider limiting the planting to the non-ocean side. He disagreed with Commissioner Evans regarding dropping the landscaping condition because, leaving it to its own devices, with foot traffic, they end up with invasive species coming in and crowding out the native plants.

Commissioner Clifford was in favor of legalizing the fence and felt it added to the safety of the cliff. He was in favor of planting anything that required very little digging because with any digging they would create an erosion problem and lose the fence that much quicker. He thought it might be better for plants that you can sprinkle on the ground and they do their own thing instead of digging and watering. He would like landscaping however.

Commissioner Gordon asked if Commissioner Clifford had the same reservations if the landscaping was on both sides as opposed to only the non-ocean side.

Commissioner Clifford would keep it on the non-ocean side because the fence was on the edge of the cliff already. He didn't think they should put anyone at risk by planting on that side.

Commissioner Gordon asked if the southern side was the non-ocean side.

Planning Director Crabtree stated that the non-ocean side was south.

Assistant Planner Farbstein stated that she suggested wording it the non-ocean side because it was difficult to figure out what was north and south and the wording of non-ocean side made sense.

Commissioner Langille felt that, the more they discussed it, the more it made sense not to require any landscaping that required digging. She knew the seasonal plants, such as daisies, etc., were what grows there and they do pretty well without watering. She felt they shouldn't be requiring much landscaping in that site except what grows there. She didn't know of any native plants that can grow from seed without digging and she didn't know if they needed to change the recommendation or leave as is. She thought it would take trial and error to plant anything that would establish itself without digging and watering. She thought leaving it as is, adding that even the best efforts of the applicant would be challenged by the people using the site. She was in favor of leaving the condition as is or changing it to say landscape with native drought tolerant plants requiring little or no digging.

Chair Nathanson stated that the condition presently reads that the applicant shall landscape along the fence with plants that grow year round to the satisfaction of the Planning Director. She asked the Planning Director if, having heard what was said, he would be able to implement that without specific language.

Planning Director Crabtree thought it was safer to add it. He thought they are all asking for native, drought tolerant plants which require minimal digging, and they could work something out. He felt adding that wording in the condition would be helpful.

Chair Nathanson clarified that it would not be an additional condition but part of condition 2.

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Planning Director Crabtree stated that she was correct.

Commissioner Gordon stated that he has been a native plant gardener for about 20 years and had a fair amount of experience with native vegetation. He stated that they can start a native garden with 1-gallon plants that require very little digging, less than what was required to put in the fence. He felt it was very doable. He stated that there was a native nursery which sells them.

Commissioner Gordon moved that the Planning Commission **APPROVE** CDP-316-09, subject to conditions 1 through 3, based on findings contained within the September 8, 2009 staff report and incorporate all maps, documents, and testimony into the record by reference, with condition 2 modified to read the applicant shall landscape along the fence with native, drought tolerant plants that grow year round, to the satisfaction of the Planning Director; Commissioner Clifford seconded the motion.

The motion carried 7-0.

Ayes:	Commissioners Evans, Langille, Clifford, Campbell, Gordon, Leon, and Chair Nathanson
Noes:	None

Chair Nathanson declared that anyone aggrieved by the action of the Planning Commission has ten (10) calendar days to appeal the decision in writing to the City Council.

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COMMISSION COMMUNICATIONS:

None.

STAFF COMMUNICATIONS:

None.

ORAL COMMUNICATIONS:

Ron Maykel, 896 Rockaway Beach, stated that the Commission had made a great decision to table the golf course deliberation regarding making it an historical landmark.

Chair Nathanson reminded Mr. Maykel that he could not discuss the golf course because it was already on the agenda.

Mr. Maykel then mentioned that the National Park Service has an interest in the golf course property, and he sees it as an opportunity of a thousand years, considering that it was contiguous with Mori Point and Sweeney Ridge, 400 acres of flat topography in the center of Pacifica with a diversity of ecosystems. He thought it could be like a City Park. He felt it was a beautiful piece of property that was in a cage and exclusionary for a particular single use but could be used by the handicapped, families, artists, etc. He felt it was a golden opportunity. He was bringing it before the Planning Commission because they were responsible for planning the future direction of the City. He felt the golf course has not really been a value to the City.

Planning Director Crabtree felt the speaker was treading on thin ice in addressing an aspect of a subject that was before them earlier in the meeting.

Chair Nathanson agreed with the Planning Director, stating that they couldn't talk about the golf course.

Mr. Maykel suggested that they merely talk about Pacifica seeing a substantial upgrade with some changes in land use. He mentioned the "war zone" of the wastewater treatment plant, the failed biodiesel treatment plant, failed illegal road on Pedro Headlands, mitigation ponds in the quarry for which the City was in violation of the Coastal Act because they neglected the 10-year mitigation program to stock the ponds with the San Francisco garter snakes and didn't do it. He felt they had a responsibility to look out for the well being of the City at large and the public.

ADJOURNMENT:

There being no further business for discussion, Commissioner Clifford moved to adjourn the meeting at 8:30 p.m.; Commissioner Gordon seconded the motion.

The motion carried 7-0.

Ayes:	Commissioners Evans, Langille, Clifford, Campbell, Gordon, Leon, and Chair Nathanson
Noes:	None

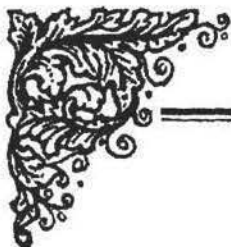
Respectfully submitted,

Planning Commission Minutes
September 8, 2009
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Barbara Medina
Public Meeting Stenographer

APPROVED:

Planning Director Michael Crabtree



PACIFICA HISTORICAL SOCIETY

P.O. Box 752 Pacifica, CA. 94044 650-359-5462 info@pacificahistory.org

June 14, 2011

Honorable Mary Ann Nihart
Mayor, City of Pacifica
170 Santa Maria Ave.
Pacifica, CA. 94404

Honorable Ed Lee
Mayor, City and County of San Francisco
1 Dr. Carlton B. Goodlett Pl.
San Francisco, CA. 94102

Honorable Carole Groom
San Mateo County Board of Supervisors
400 County Center
Redwood City, CA. 94063

**Re: Pacifica Historical Society Recognizes Sharp Park Golf Course as
An "historic resource", and calls upon elected officials to
Save the 80-year-old, 18-hole golf course.**

Dear Mayors Nihart and Lee, and President Groom,

The Pacifica Historical Society, official historian of the City of Pacifica, by unanimous vote of its Board of Directors on June 14, 2011, adopted a Resolution recognizing the Sharp Park Golf Course as "a significant historical and cultural resource," and called upon public officials of all levels of government "to preserve the historic 18-hole golf course for the enjoyment and appreciation of future generations." Enclosed is a copy of that Resolution.

Among other things, the Historical Society's Resolution cites the following facts in support of our determination that the Sharp Park Golf Course is an "historical resource". The golf course was opened in 1932, and designed by Dr. Alister MacKenzie, the first golf architect inducted into the World Golf Hall of Fame, and the architect of Augusta National Golf Club (home of the annual Master's

Tournament), Cypress Point Club, and other outstanding golf courses around the world. Dr. MacKenzie was also the consulting architect at the Old Course at St. Andrews, Scotland, the ancestral home of the game of golf.

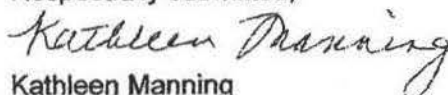
Dr. MacKenzie was assisted in the construction of Sharp Park Golf Course by Golden Gate Park Superintendent John McLaren, who planted the Monterey cypress trees on the property. MacKenzie intentionally created Sharp Park in the distinctive style of Scottish seaside links courses, the original type of golf course. Sharp Park is one of the few public golf courses in the world designed by Dr. MacKenzie. Today the golf course retains 12 of Dr. MacKenzie's original 18 holes, with two other existing holes being played in original MacKenzie-designed fairways. The golf course retains design features characteristic of Dr. MacKenzie's architecture, including its mounded greens, accessibility to all skill levels, and its picturesque beauty.

The Cultural Landscape Foundation of Washington, DC has recognized Sharp Park as an at-risk, nationally-significant cultural landscape.

The Pacifica Historical Society's Resolution is supported by extensive historical research, including historic photographs, newspaper stories, and architectural drawings published contemporaneously with the design and opening of the golf course, and contemporaneous accounts of design and construction from Dr. MacKenzie and members of his design team. We will be happy to make these materials available to you, upon request.

The mission of the Pacifica Historical Society includes preservation of the history of Pacifica and its historical sites, to act as official historian for the City of Pacifica, and to advise public officials regarding historical matters and the preservation of historical sites. Consistent with our mission, and upon consideration of a substantial historical record, our Society has determined Sharp Park Golf Course to be an historic and cultural resource of the City of Pacifica, and we hereby call upon governmental agencies at all levels to preserve the 18-hole Alister MacKenzie-designed golf course.

Respectfully submitted,



Kathleen Manning
President
Pacifica Historical Society

encl.

cc (w/encl.): Honorable Jackie Speier, U.S. House of Representatives
David Chiu, President, San Francisco Board of Supervisors
Frank Dean, General Superintendent, GGNRA
David Holland, Deputy County Manager, San Mateo County
Phil Ginsburg, General Manager, San Francisco Recreation and Park Department
Mark Buell, President, San Francisco Recreation and Park Commission

RESOLUTION OF PACIFICA HISTORICAL SOCIETY
RECOGNIZING SHARP PARK GOLF COURSE AS AN HISTORICAL RESOURCE

WHEREAS: The Sharp Park Golf Course, located in Pacifica, CA., is owned by the City and County of San Francisco, and operated by the San Francisco Recreation and Park Department; and

WHEREAS: The golf course, opened in 1932, was designed by golf architect Dr. Alister MacKenzie; and

WHEREAS: Dr. MacKenzie is one of history's best-known, most influential, and most revered golf architects, and is the first golf architect inducted into the World Golf Hall of Fame; and

WHEREAS: Dr. MacKenzie was architect of over 400 golf courses worldwide, including the Augusta National (home of the annual Masters Tournament) and Cypress Point Club on the Monterey Peninsula (which golf courses have been identified by Golf Digest Magazine as two of the four "greatest" American golf courses), and was the consulting architect at the Old Course at St. Andrews, Scotland, the ancestral home of the game of golf; and

WHEREAS: Dr. MacKenzie was assisted at Sharp Park Golf Course by Golden Gate Park Superintendent John McLaren, whose involvement included the planting of the Monterey cypress trees; and

WHEREAS: Dr. MacKenzie intentionally created Sharp Park in the distinctive style of the Scottish seaside links courses such as St. Andrews; and

WHEREAS: Seaside links golf courses are historically and culturally significant, because the game of golf originated on the seaside links courses of Scotland, including the Old Course at St. Andrews; and

WHEREAS: Public seaside links golf courses are very rare, and Sharp Park Golf Course is one of the few seaside public links courses in the State of California; and

WHEREAS: Sharp Park Golf Course is one of the few public golf courses in the world designed by Dr. MacKenzie, and is one of only two public seaside links courses in the world (the other being at St. Andrews, Scotland) to have been designed by Dr. MacKenzie; and

WHEREAS: Sharp Park Golf Course today retains 12 of its 18 original MacKenzie-designed holes, with two other existing holes being played in original MacKenzie-designed fairways; and

WHEREAS: Sharp Park Golf Course retains design features characteristic of Dr. MacKenzie's architecture, including its mounded greens, its accessibility and playability to golfers of all skill levels, and its great, picturesque beauty; and

WHEREAS: The Cultural Landscape Foundation of Washington D.C. has recognized Sharp Park Golf Course as an at-risk, nationally-significant cultural landscape; and

WHEREAS: The Purpose of the Pacifica Historical Society is to collect information and items of historical interest to the area now called the City of Pacifica. The Society is to provide for the preservation, accessibility, and protection of information and material collected as historical and educational resources. In preserving the fine and unique from our past, the present and the ordinary should not be overlooked. The society is to work toward the preservation of historical sites, buildings, monuments and markers. The Society is to act upon request as official historian for the City of Pacifica. It will be available to advise the City Council regarding historical matters and matters relating to the preservation of historical sites, buildings, monuments and markers.

NOW, THEREFORE, BE IT RESOLVED that the Pacifica Historical Society recognizes Sharp Park Golf Course as a significant historical and cultural resource, and calls upon public officials, elected and non-elected, of all levels of government, including but not limited to the City of Pacifica, County of San Mateo, City and County of San Francisco, and the National Parks Service, to preserve the historic 18-hole golf course for the enjoyment and appreciation of future generations.

IT IS SO RESOLVED.

Kathleen Manning
Kathleen Manning, President,
Pacifica Historical Society

June 14, 2011
Date

Pacifica Historical Society Board Members

Clarenda L. Campagna

Erika D. Rydberg

Barbara Arietta

Helena James

Mary J. Daugherty

Katherine Kirkland

Robert D. Crow

2



The Cultural Landscape Foundation

stewardship through education

Published on The Cultural Landscape Foundation (<http://tclf.org>)

Sharp Park Golf Course Threatened with Closure

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Designed by the legendary golf course architect Dr. Alister MacKenzie, Sharp Park Golf Course faces potential closure due to pressure from environmental activists and San Francisco city officials.

Just months before starting on his masterpiece Augusta National Golf Course in Georgia, Dr. Alister MacKenzie designed his only seaside public links at Sharp Park, a San Francisco municipally-owned course located 10 miles south of the city in the beachside suburb of Pacifica, California. Since opening in 1932, Sharp Park has hosted an annual average 50,000 rounds, with some of the lowest green fees of any 18-hole course in the Bay Area. Today, the course also is home to the threatened red-legged frog and the endangered San Francisco garter snake; and environmental activists have lobbied city officials to close the course and dedicate the land to these two listed species. The San Francisco Board of Supervisors in April 2009 adopted an ordinance to study how—and if—the golf course can be kept open, consistent with restoring reptilian habitat. So today environmentalists are politically squaring-off against golfers, landscape preservationists, and Pacifica city officials who want to keep the course open.

History

At the turn of the 20th Century, San Francisco city fathers aspired to fashion the city as a major world capital, a "New Constantinople." For this purpose they retained Daniel Burnham who, just three years after completing his master plan for Washington, D.C., completed his San Francisco Plan in 1904. Though the Burnham plan was not fully adopted, it became the impetus for San Francisco's grand public architecture, including the Beaux Arts Civic Center, and monuments by world masters, from the Golden Gate to the Embarcadero, and Bernard Maybeck's Palace of Fine Arts.

In this spirit, John McLaren, head of the city's park system and father of Golden Gate Park, hired the world's preeminent golf architect, Dr. Alister MacKenzie, to design a municipal golf course at Sharp Park, on property donated to the city exclusively for recreational purposes. Born in England and educated as a medical doctor at Cambridge, MacKenzie served as a surgeon in the Boer War and as a camouflager in World War I before moving to the Bay Area and devoting himself full-time to golf architecture. As a golf architect, MacKenzie was a naturalist in the tradition of Capability Brown, the 18th-century English landscape gardener. "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."



Courtesy Jeff Phillips. Copyright *Sports Illustrated*. (right) Courtesy Gerry Groppn.

Although he had designed legendary courses outside the States, MacKenzie developed his American reputation with a burst of greatness between 1928 and 1933, the final six years of his life. During that span, he designed several of the world's most celebrated courses, including Cypress Point in Monterey and Pasatiempo in Santa Cruz, California; Crystal Downs in Michigan; Royal Melbourne in Australia; and, in collaboration with Bobby Jones, Augusta National in Georgia. (Augusta is home of the annual Masters Tournament and has been noted as America's greatest course by *Golf Digest Magazine*.) It was during this prolific time that MacKenzie designed Sharp Park, one of only a handful of his public courses.

Today at Sharp Park, golfers play 12 of MacKenzie's original holes, and parts of two others. Two original seaside holes are now buried beneath the seawall, while the routings of three other original MacKenzie holes lie fallow in the sand dunes at the course's west end. Ocean vistas are now blocked by the seawall, but the course retains its links character and the air, wind, sounds, and smells of the sea.

Sharp Park also retains the artistry of its creator—including MacKenzie's picturesque routing, his trademark optical illusions, and his false-fronted, heaving and tumbling greens. The current 14th hole for example, displays MacKenzie's use of camouflage principles. A large mound 30 yards in front of the right side of the green appears from the vantage of the drive in the fairway to be adjacent to the green, thus testing the golfer's mental skill and discipline to hit the proper shot, in spite of what appears to the eye.

Today, with green fees as low as \$24 on weekends, the course continues to provide a world-class seaside recreational experience to golfers from diverse social and economic backgrounds in a city known for such diversity. In this way, the unpretentious, old-fashioned Sharp Park Golf Course closely resembles the public links of the sport's homeland, Scotland.



Courtesy Jeff Phillips

Threat

Under pressure from environmental activist groups, the San Francisco Board of Supervisors in early May 2009 directed the city's Recreation and Park Department to explore plans to close the golf course and convert some or all of its acreage to a wildlife preserve for the frog and snake. The Department is due to report back to the Supervisors by August 31, 2009.

Over the years, San Franciscans have defended their cable cars, the Palace of Fine Arts, Golden Gate Park and City Hall, and have restored the Embarcadero, from natural, commercial and political disasters and threats. MacKenzie's public golf masterpiece at Sharp Park is worthy of the same kind of citizen effort to save this world-class work of public landscape architecture.

The San Francisco Public Golf Alliance is leading a charge to preserve Sharp Park for future generations of golfers and public landscape aficionados, and find a way to restore Sharp Park's frog and snake habitat as well. Despite the Alliance's efforts to raise awareness and funds to maintain environmental harmony at the golf course, the future of this cultural landscape is very much in jeopardy.

Bibliography

Doak, Tom. *The Life and Work of Dr. Alister MacKenzie* (Sleeping Bear Press 2001).

MacKenzie, Alister. *The Spirit of St. Andrews* (Sleeping Bear Press, orig. manuscript 1934, publ. 1995).

Wexler, Daniel. *The Missing Links* (Sleeping Bear Press 2001).

Get Involved

To get involved, please contact the San Francisco Public Golf Alliance at info@sfpublicgolf.com [5]

You can also contact city officials directly to voice your concerns:

San Francisco Recreation and Parks Commission
Jim Lazarus, President
501 Stanyan Street
San Francisco, CA 94117-1898
Recreark.commission@sfgov.org [6]

San Francisco Board of Supervisors
Hon. Sean Elsbernd
#1 Dr. Carleton B. Goodlett Plaza
San Francisco, CA. 94102-4889
Sean.elsbernd@sfgov.org [7]

(Please copy all correspondence with San Francisco officials to info@sfpublicgolf.com [5])

About the Author:

Mayor Lancelotti is the currently-serving, second-term Mayor of the City of Pacifica, home of the Sharp Park Golf Course. She has been a Pacifica community leader on public schools and environmental issues, and helped establish the Pacifica Land Trust. Bo Links is a golf historian and author of *How the Wind* [1995, Simon & Schuster] and *Riverbank Tweed & Roadmap Jenkins: Tales from the Caddie Yard* [2001, Simon & Schuster]. As an amateur golf architect, he is two-time winner of the Alister MacKenzie Society's Lido Design Prize for golf architecture. He is a San Francisco attorney, who serves as a volunteer Golf Historian for the City & County of San Francisco. Jeffrey Phillips, when he is not golfing on the Bay Area's public golf courses or volunteering for the San Francisco Public Golf Alliance, is a San Francisco management consultant.

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About TCLF



The Cultural Landscape Foundation (TCLF) is the only not-for-profit (501c3) foundation in America dedicated to increasing the public's awareness and understanding of the importance and irreplaceable legacy of its cultural landscapes.

Through education, technical assistance, and outreach, we broaden awareness of and support for historic landscapes nationwide in hopes of saving this diverse and priceless heritage for future generations. While TCLF seeks donations to support its efforts, it is not a membership organization.

Founded in 1998 by Charles Birnbaum, FASLA, TCLF achieves its mission by

- Collaborating with individuals and local, regional, and national groups to understand and protect our landscape heritage and to reach the broadest possible audience. For example, TCLF is one of the American Society of Landscape Architects' "partners in education";
- Training professionals, students, teachers, and the general public to recognize, document and safeguard America's cultural landscapes;
- Serving as the nation's largest and most valuable non-profit source of information about our nation's historic landscapes and those pioneering individuals who have contributed (through design, planning and advocacy) to this legacy;
- Raising awareness of and support for individual landscapes-at-risk; and
- Recognizing and celebrating the efforts of owners, supporters and stewards of significant American places.

TCLF's overall success can be measured by the millions of people who have learned about cultural landscapes through its website, publications and events—as well as through the growing national awareness of the importance of America's cultural landscapes and the increasing efforts to document and protect this heritage.

TCLF's core efforts include:



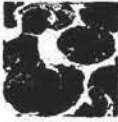
[Cultural Landscapes as Classrooms](#) — 12/10/2014

teaching people to "read" the landscapes that surround them, to understand how changes affect these special places, and to become better stewards of our significant cultural landscape heritage.



[Stewardship Stories](#) — 12/10/2014

recognizing individuals who share our vision of "stewardship through education" by working to raise awareness of cultural landscapes in their community.



Landslide: A Guide

drawing immediate and lasting attention to threatened cultural landscapes, sparking debate and encouraging informed, community-based stewardship decisions



Pioneers of American Landscape Design: A Guide

chronicling the lives and careers of those who have designed our gardens, parks, streets, campuses, cemeteries, suburbs, and the innumerable other environments in which we live



What's Out There: A Guide

raising the public's awareness of the rich diversity and interconnectedness of our shared designed landscape heritage by providing context about these sites through an easy-to-navigate, searchable database



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Landslide



Endangered San Francisco: A Cultural Landscape

The goal of *Landslide* is to draw immediate and lasting attention to threatened landscapes and unique features.

Landslide sparks debate—revealing the value of everyday places—encouraging informed community-based stewardship decisions. *Landslide* both highlights and monitors at-risk landscapes and annual thematic listings to save this heritage for future generations. Through web features, traveling exhibits, and print publications, *Landslide* reveals the value of these often forgotten landscapes.

Landslide is designed to educate and thereby rally support at the local, state, and national levels by calling attention to endangered landscapes in communities nationwide. *Landslide* both highlights and monitors at-risk landscapes and annual thematic listings. By creating an interactive, online resource, *Landslide* directs the public to local advocates working to safeguard each site. While many *Landslide* properties have been saved, others remain at-risk or were lost all together.

Landslide features are written by outside authors and provide a history of each threatened site; the social, cultural, and artistic significance; a biography of the landscape architect or designer, if applicable; and details of the current threat. The articles are reviewed and vetted by TCLF staff prior to publication on our website in hopes of encouraging an informed dialogue.

This initiative includes:



[At-Risk](#)

richly illustrated, online features that include a history of the site, the nature of the threat, and critical information for learning more and getting involved.



[Annual Spotlight](#)

online features, signboard exhibits, and exhibitions of original photography highlight thematic designees, nominated by the public and selected to highlight current issues in design and historic preservation.



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At-Risk Landscapes



May 9, 2011

[Consensus Reached:
Design Workshop to
Reopen Heritage Park
Plaza](#) [HeritageParkPlaza](#)
[heritageparkplaza.com](#)

[Consensus Reached](#)

Fort Worth, Texas

The City of Fort Worth closed Heritage Park Plaza in 2007. Concerned citizens have since been working with City officials to address the issues.



April 22, 2011

[Washington Square Village
Eligible for Listing in the National
Register of Historic Places](#) [WashingtonSquareVillage](#)
[washingtonsquarevillage.com](#)

New York, New York

In April 2011, the New York State Historic Preservation Office (SHPO) determined that the Washington Square Village complex is sufficiently significant to qualify for possible listing in the State and National Register of Historic Places.



April
19,
2011

[Brookview Neighborhood Threatened by Potential
Development](#) [BrookviewNeighborhoodThreatenedByPotentialDevelopment](#)
[brookviewneighborhood.com](#)

Fort Wayne, Indiana

Arthur Shurcliff's Brookview was one of the first planned communities in Fort Wayne. It is now threatened by four proposed municipal projects.



April 5, 2011

[Sharp Park Golf Course
Subject of Lawsuit](#) [SharpParkGolfCourse](#)
[sharp-park-golf-course.com](#)

Pacifica, California

The 80-year-old, Alister MacKenzie-designed Sharp Park Golf Course, owned by the City of San Francisco, but located in its southern beach-side suburb of Pacifica, CA, is the subject of a lawsuit.



March 16, 2011

[Northern State Hospital Listed in the National
Register of Historic Places](#) [NorthernStateHospital](#)
[northernstatehospital.com](#)

Sedro-Woolley, Washington

Northern State Hospital, a treatment facility for the mentally ill built in 1909, was listed in the National Register of Historic Places on December 20, 2010.



March 14, 2011

[Buttonwood
Park's
Legacy
Threatened](#) [ButtonwoodPark](#)
[buttonwoodpark.com](#)

U.S. Fish and Wildlife Service | Bureau of Land Management | U.S. Department of the Interior

Page 4 of 4

[by Master Plan](#) [eliminating public access to the park](#) [proposed by](#)
[Bedford](#)

New Bedford, Massachusetts

The 97-acre, Olmsted-designed neighborhood park, listed on the National Register of Historic Places is threatened by a proposed zoo Master Plan that would double its footprint within the historic park



March 11, 2011

[Revolutionary War Era](#)
[Fishkill Supply Depot](#)
[Threatened](#) [by proposed](#)
[Supply Depot](#) [Threatened](#)

Fishkill, New York

Fishkill Supply Depot thrived as a sophisticated military city center during the height of the war. Currently, two properties at the heart of the complex are at risk of development



March 11, 2011

[Victor](#)
[Steinbrueck](#)
[Park Design](#)
[Threatened by](#)
[Renovations](#)

[Victor Steinbrueck Park](#) [is now](#) [threatened by renovations](#)

Seattle, Washington

Designed to harmonize the traditional market setting of Seattle's Pike Place with surrounding buildings, Victor Steinbrueck Park is now threatened by proposed renovations



November 8, 2010

[Fresno Park](#)
[Threatened by](#)
[Master Plan](#)

[Fresno Park](#) [is now](#) [threatened by](#)

[Fresno Park](#)

Fresno, California

Roeding Park is an outstanding example of naturalistic landscape design style and a historically significant arboretum. A new master plan for the zoo within it now threatens the landscape



August 11, 2010

[San Francisco](#)
[Continues Funding](#)
[Sharp Park Golf](#)
[Course](#) [is a driving](#)

[Sharp Park Golf Course](#) [is a driving](#)

[Sharp Park](#)

Pacifica, California

The San Francisco Board of Supervisors adopted a \$6.5 Billion final 2010-2011 budget that leaves intact funding for Sharp Park Golf Course

U.S. Fish and Wildlife Service | Bureau of Land Management | U.S. Department of the Interior



Welcome to the online source for the California Code of Regulations

14 CA ADC § 15064.5

14 CCR § 15064.5

Cal. Admin. Code tit. 14, § 15064.5

Barclays Official California Code of Regulations [Currentness](#)

Title 14. Natural Resources

Division 6. Resources Agency

Chapter 3. Guidelines for Implementation of the California Environmental Quality Act

Article 5. Preliminary Review of Projects and Conduct of Initial Study

➡ § 15064.5. Determining the Significance of Impacts to Archaeological and Historical Resources.

(a) For purposes of this section, the term "historical resources" shall include the following:

(1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code §5024.1, Title 14 CCR, Section 4850 et seq.).

(2) A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

(3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code, § 5024.1, Title 14 CCR, Section 4852) including the following:

(A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

(B) Is associated with the lives of persons important in our past;

(C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

(D) Has yielded, or may be likely to yield, information important in prehistory or history.

(4) The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public

<http://weblinks.westlaw.com/result/default.aspx?cite=14CAADCS15064%2E5&db=10009...> 9/20/2011

Resources Code sections 5020.1(j) or 5024.1.

(b) A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

(1) Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.

(2) The significance of an historical resource is materially impaired when a project:

(A) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or

(B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

(C) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

(3) Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource.

(4) A lead agency shall identify potentially feasible measures to mitigate significant adverse changes in the significance of an historical resource. The lead agency shall ensure that any adopted measures to mitigate or avoid significant adverse changes are fully enforceable through permit conditions, agreements, or other measures.

(5) When a project will affect state-owned historical resources, as described in Public Resources Code Section 5024, and the lead agency is a state agency, the lead agency shall consult with the State Historic Preservation Officer as provided in Public Resources Code Section 5024.5. Consultation should be coordinated in a timely fashion with the preparation of environmental documents.

(c) CEQA applies to effects on archaeological sites.

(1) When a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource, as defined in subdivision (a).

(2) If a lead agency determines that the archaeological site is an historical resource, it shall refer to the provisions of Section 21084.1 of the Public Resources Code, and this section, Section 15126.4 of the Guidelines, and the limits contained in Section 21083.2 of the Public Resources Code do not apply.

(3) If an archaeological site does not meet the criteria defined in subdivision (a), but does meet the definition of a unique archeological resource in Section 21083.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of section 21083.2. The time and cost limitations described in Public Resources Code Section 21083.2 (c-f) do not apply to surveys and site evaluation activities intended to determine whether the project location contains unique archaeological resources.

(4) If an archaeological resource is neither a unique archaeological nor an historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment. It shall be sufficient that both the resource and the effect on it are noted in the Initial

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Study or EIR, if one is prepared to address impacts on other resources, but they need not be considered further in the CEQA process.

(d) When an initial study identifies the existence of, or the probable likelihood, of Native American human remains within the project, a lead agency shall work with the appropriate Native Americans as identified by the Native American Heritage Commission as provided in Public Resources Code section 5097.98. The applicant may develop an agreement for treating or disposing of, with appropriate dignity, the human remains and any items associated with Native American burials with the appropriate Native Americans as identified by the Native American Heritage Commission." Action implementing such an agreement is exempt from:

(1) 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).

(2) The requirements of CEQA and the Coastal Act.

(e) In the event of the accidental discovery or recognition of any human remains in any location other than a dedicated cemetery, the following steps should be taken:

(1) There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until:

(A) The coroner of the county in which the remains are discovered must be contacted to determine that no investigation of the cause of death is required, and

(B) If the coroner determines the remains to be Native American:

1. The coroner shall contact the Native American Heritage Commission within 24 hours.

2. The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descended from the deceased Native American.

3. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code section 5097.98, or

(2) Where the following conditions occur, the landowner or his authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance.

(A) The Native American Heritage Commission is unable to identify a most likely descendent or the most likely descendent failed to make a recommendation within 24 hours after being notified by the commission.

(B) The descendant identified fails to make a recommendation; or

(C) The landowner or his authorized representative rejects the recommendation of the descendant, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner.

(f) As part of the objectives, criteria, and procedures required by Section 21082 of the Public Resources Code, a lead agency should make provisions for historical or unique archaeological resources accidentally discovered during construction. These provisions should include an immediate evaluation of the find by a qualified archaeologist. If the find is determined to be an historical or unique archaeological resource, contingency funding and a time allotment sufficient to allow for implementation of avoidance measures or appropriate mitigation should be available. Work could continue on other parts of the building site while historical or unique archaeological resource mitigation takes place.

Note: Authority cited: Section 21083, Public Resources Code. Reference: Sections 21083.2, 21084 and 21084.1, Public Resources Code; and Citizens for Responsible Development in West Hollywood v. City of

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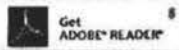
West Hollywood (1995) 39 Cal.App.4th 490.

HISTORY

1. New section filed 10-26-98; operative 10-26-98 pursuant to PublicResources Code section 21087 (Register 98, No. 44).
2. Change without regulatory effect amending subsections (c)(1), (c)(3), (d) and (e)(1)(B)2.-3. and amendingNote filed 10-6-2005 pursuant to section 100, title 1, California Code of Regulations (Register 2005, No. 40).

14 CCR § 15064.5, 14 CA ADC § 15064.5
This database is current through 9/2/11 Register 2011, No. 35
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**ADOPTED-Board of Supervisors, San Francisco,
Nov. 3, 1930.**

Ayes: Supervisors Andriano, Canepa, Colman,
Gallagher, Havenner, Hayden, McGovern,
McSheehy, Peyser, Power, Rossi, Shannon,
Spaulding, Stanton, Suhr, Toner.

Absent: Supervisors Miles, Roncovieri.

J.S. DUNNIGAN, Clerk.

Approved, San Francisco, Nov. 14, 1930.

JAMES ROLPH, JR., Mayor

Ordered spread upon the minutes of this meeting.

The Secretary then read the following resolution
of the Board of Supervisors:

RESOLUTION NO. 33588 (New Series):

RESOLVED, That, pursuant to and in compliance
with Section 8, Article XVI of the Charter, the
Board of Park Commissioners be and is hereby
authorized to employ Dr. Alister Mackenzie,
Golf Architect, for services in connection
with the construction of the Municipal Golf
Course at Sharp Park, San Mateo County.

**ADOPTED-Board of Supervisors, San Francisco,
Dec. 6, 1930.**

Ayes: Supervisors Andriano, Canepa, Havenner,
McGovern, Miles, Peyser, Roncovieri, Rossi,
Shannon, Spaulding, Stanton, Suhr, Toner.

Absent: Supervisors Colman, Gallagher, Hayden,
McSheehy, Power.

J.S. DUNNIGAN, Clerk.

Approved, San Francisco, Dec. 20, 1930.

JAMES ROLPH, JR., Mayor

Ordered spread upon the minutes of this meeting.

**Beacon Lights-
at Highway:** A letter was next presented from Chief of Police
William J. Quinn, requesting the installation of beacon
lights similar to those on safety islands, on each end
of the upper Esplanade, namely at Lincoln Way and
Sloat Boulevard.

Referred to Superintendent John McLaren, with
full power to act.

Golf Digest GolfWorld

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America's 100 Greatest Golf Courses/2009-10

The game's oldest ranking, established in 1966



NATIONAL GOLF LINKS / No. 15 among America's 100 Greatest.

Stephen Szurlej

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PHOTOS BY STEPHEN SZURLEJ

May 2009

* 2007 RANK IN PARENTHESES
TIES BROKEN IN FAVOR OF COURSES WITH MORE EVALUATIONS

Rank	Course	2007 Rank	Par	Score
1.	(3) AUGUSTA NATIONAL G.C. Augusta, Ga. / Alistair Mackenzie & Bobby Jones (1933)	7.435	72	73.39
2.	(1) PINE VALLEY G.C. Pine Valley, N.J. / George Crump & H.S. Colt (1918)	7.047	70	73.03
3.	(2) SHINNECOCK HILLS G.C. Southampton, N.Y. / William Flynn (1931)	6.781	70	70.25
4.	(4) CYPRESS POINT CLUB Pebble Beach / Alistair Mackenzie & Robert Hunter (1926)	6.509	72	69.84
5.	(5) OAKMONT C.C. Oakmont, Pa. / Henry Fownes (1903)	7.255	71	69.17
6.	(6) PEBBLE BEACH G. LINKS Pebble Beach / Jack Neville & Douglas Grant (1910)	6.737	72	68.82
7.	(7) MERION G.C. (East) Ardmore, Pa. / Hugh Wilson (1912)	6.886	70	68.58
8.	(8) WINGED FOOT G.C. (West) Mamaroneck, N.Y. / A.W. Tillinghast (1923)	7.258	72	68.23
9.	(14) FISHERS ISLAND CLUB Fishers Island, N.Y. / Seth Raynor & Charles Banks (1926)	6.566	72	67.28
10.	(9) SEMINOLE G.C. Juno Beach, Fla. / Donald Ross (1929)	6.836	72	66.91

11.	(25) OAK HILL C.C. (East) Rochester, N.Y. / Donald Ross (1925)	7,145	71	66.74
12.	(28) CHICAGO G.C. Wheaton, Ill. / C.B. Macdonald (1894) / Seth Raynor (1923)	6,846	70	66.44
13.	(12) SAND HILLS G.C. Mullen, Neb. / Bill Coore & Ben Crenshaw (1994)	7,089	71	66.39
14.	(14) PACIFIC DUNES Bandon, Ore. / Tom Doak (2001)	6,633	71	66.36
15.	(13) NATIONAL G. LINKS OF AMERICA Southampton, N.Y. / C.B. Macdonald (1911)	6,935	72	66.35
16.	(10) CRYSTAL DOWNS C.C. Frankfort, Mich. / Alister Mackenzie & Perry Maxwell (1931)	6,518	70	66.15
17.	(15) WADE HAMPTON G.C. Cashiers, N.C. / Tom Fazio (1987)	7,218	72	66.05
18.	(20) THE COUNTRY CLUB (Clyde/Squirrel) Brookline, Mass. / Willie Campbell (1895) / Alex Campbell (1902)	6,577	71	66.03
19.	(18) MUIRFIELD VILLAGE G.C. Dublin, Ohio / Jack Nicklaus & Desmond Muirhead (1974)	7,331	72	65.86
20.	(11) MEDINAH C.C. (No. 3) Medinah, Ill. / Tom Benkelow (1928)	7,561	72	65.76
21.	(30) PRAIRIE DUNES C.C. Hutchinson, Kan. / Perry Maxwell (1937) / Press Maxwell (1957)	6,708	70	65.68
22.	(24) WHISTLING STRAITS (Straits) Haven, Wis. / Pete Dye (1998)	7,362	72	65.53
23.	(17) OAKLAND HILLS C.C. (South) Bloomfield Hills, Mich. / Donald Ross (1918) / Robert Trent Jones (1950)	7,445	72	65.47
24.	(22) VICTORIA NATIONAL G.C. Newburgh, Ind. / Tom Fazio (1998)	7,239	72	64.95
25.	(38) THE OCEAN COURSE Kauai Island, S.C. / Pete Dye (1991)	7,356	72	64.83
26.	(23) THE OLYMPIC CLUB (Lake) San Francisco / Sam Whiting (1924)	7,112	71	64.81
27.	(New) THE CLUB AT BLACK ROCK Coeur d'Alene, Idaho / Jim Engh (2003)	7,130	72	64.75
28.	(36) CASTLE PINES G.C. Castle Rock, Colo. / Jack Nicklaus (1981)	7,696	72	64.65
29.	(26) BETHPAGE STATE PARK (Black) Farmingdale, N.Y. / Joseph H. Burbeck & A.W. Tillinghast (1936)	7,386	71	64.65
30.	(44) BALTUSROL G.C. (Lower) Springfield, N.J. / A.W. Tillinghast (1922)	7,400	72	64.62
31.	(61) RIVIERA C.C. Pacific Palisades, Calif. / George C. Thomas Jr. & W.P. Bell (1926)	7,298	71	64.51
32.	(19) PINEHURST RESORT & C.C. (No. 2) Pinehurst, N.C. / Donald Ross (1935)	7,335	72	64.43
33.	(31) BANDON DUNES Bandon, Ore. / David McLay Kidd (1999)	7,212	72	64.35
34.	(32) SOUTHERN HILLS C.C. Tulsa, Okla. / Perry Maxwell (1936)	7,150	71	64.15
35.	(40) THE GOLF CLUB New Albany, Ohio / Pete Dye (1967)	7,268	72	64.02
36.	(37) SAN FRANCISCO G.C. San Francisco / A.W. Tillinghast (1918)	6,828	71	63.96
37.	(21) BUTLER NATIONAL G.C. Oak Brook, Ill. / George Fazio & Tom Fazio (1974)	7,523	71	63.95
38.	(35) THE HONORS COURSE Ooltewah, Tenn. / Pete Dye (1983)	7,481	72	63.85
39.	(New) SEBONACK G.C. Southampton, N.Y. / Jack Nicklaus & Tom Doak (2006)	7,481	72	63.84
40.	(41) INVERNESS CLUB Toledo, Ohio / Donald Ross	7,255	71	63.79
41.	(27) SHADOW CREEK North Las Vegas, Nev. / Tom Fazio (1990)	7,560	72	63.77
42.	(New) CANYATA G.C. Marshall, Ill. / Bob Lohmann & Mike Benkusky (2004)	7,258	72	63.73
43.	(42) OLYMPIA FIELDS C.C. (North) Olympia Fields, Ill. / Willie Park Jr. (1922)	7,205	70	63.52
44.	(47) THE QUARRY AT LA QUINTA La Quinta, Calif. / Tom Fazio (1994)	7,083	72	63.42
45.	(79) TPC SAWGRASS (Players Stadium) Ponte Vedra Beach, Fla. / Pete Dye (1980)	7,215	72	63.35
46.	(51) RICH HARVEST LINKS Sugar Grove, Ill. / Jerry Rich & Greg Martin (1999)	7,758	72	63.33

47.	(34) LOS ANGELES C.C. (North) Los Angeles / George C. Thomas Jr. (1921)	6,909	71	63.26
48.	(29) KINLOCH G.C. Manakin-Sabot, Va. / Lester George & Vinny Giles (2001)	7,203	72	63.25
49.	(46) ARCADIA BLUFFS G.C. Arcadia, Mich. / Rick Smith & Warren Henderson (2000)	7,300	72	63.17
50.	(50) SHOAL CREEK Shoal Creek, Ala. / Jack Nicklaus (1977)	7,234	72	63.17
2007 RANK IN PARENTHESES				
TIES BROKEN IN FAVOR OF COURSES WITH MORE EVALUATIONS				
RANK	COURSE NAME	PAR	SCORE	AVG
51.	(52) SPYGLASS HILL G. CSE. Pebble Beach / Robert Trent Jones (1966)	6,953	72	63.15
52.	(48) MILWAUKEE C.C. River Hills, Wis. / H.S. Colt & C.H. Allison (1929)	7,094	72	63.14
53.	(56) GARDEN CITY G.C. Garden City, N.Y. / Devereux Emmet (1899)	6,911	73	63.08
54.	(53) CHERRY HILLS C.C. Englewood, Colo. / William Flynn (1923)	7,586	72	62.94
55.	(45) FOREST HIGHLANDS G.C. (Canyon) Flagstaff, Ariz. / Jay Morrish & Tom Weiskopf (1968)	7,007	71	62.79
56.	(70) DOUBLE EAGLE CLUB Galena, Ohio / Jay Morrish & Tom Weiskopf (1992)	7,140	72	62.72
57.	(99) PETE DYE G.C. Bridgeport, W.Va. / Pete Dye (1994)	7,248	72	62.72
58.	(54) KITTANSETT CLUB Marion, Mass. / William Flynn & Fredenc Hood (1922)	6,811	70	62.63
59.	(59) DALLAS NATIONAL G.C. Dallas / Tom Fazio (2002)	7,326	72	62.54
60.	(87) PEACHTREE G.C. Atlanta / Robert Trent Jones & Bobby Jones (1947)	7,414	72	62.49
61.	(58) SCIOTO C.C. Columbus, Ohio / Donald Ross (1916)	7,106	71	62.49
62.	(84) EUGENE C.C. Eugene, Ore. / Robert Trent Jones (1967)	7,033	72	62.35
63.	(49) FLINT HILLS NATIONAL G.C. Andover, Kan. / Tom Fazio (1997)	6,946	71	62.34
64.	(62) INTERLACHEN C.C. Edina, Minn. / Willie Watson (1911)	6,900	73	62.31
65.	(43) WINGED FOOT G.C. (East) Mamaroneck, N.Y. / A.W. Tillinghast (1923)	6,792	72	62.29
66.	(68) CONGRESSIONAL C.C. (Blue) Bethesda, Md. / Robert Trent Jones (1962)	7,250	72	62.25
67.	(39) THE PRINCE COURSE Princeville, Kauai, Hawaii / Robert Trent Jones Jr. (1990)	7,309	72	62.08
68.	(New) STONE CANYON CLUB Oro Valley, Ariz. / Jay Morrish (2000)	7,317	72	62.06
69.	(64) EAST LAKE G.C. Atlanta / Donald Ross (1915) / Rees Jones (1995)	7,374	72	62.06
70.	(74) GALLOWAY NATIONAL G.C. Galloway, N.J. / Tom Fazio (1995)	6,901	71	62.06
71.	(85) PLAINFIELD C.C. Plainfield, N.J. / Donald Ross (1921)	7,107	72	62.03
72.	(77) MONTEREY PENINSULA C.C. (Shore) Pebble Beach / Bob Baldock (1961) / Mike Strantz (2004)	6,914	72	62.01
73.	(78) LONG COVE CLUB Hilton Head Island / Pete Dye (1981)	7,026	71	61.99
74.	(68) SHOREACRES Lake Bluff, Ill. / Seth Raynor (1921)	6,521	71	61.99
75.	(83) HARBOUR TOWN G. LINKS Hilton Head Island / Pete Dye & Jack Nicklaus (1969)	6,973	71	61.98
76.	(New) ARONIMINK G.C. Newtown Square, Pa. / Donald Ross (1928)	7,152	70	61.97
77.	(82) LAUREL VALLEY G.C. Ligonier, Pa. / Dick Wilson (1959)	7,327	72	61.97
78.	(66) THE PRESERVE G.C. Carmel, Calif. / Tom Fazio / J. Michael Poelot & Sandy Tatum (2000)	7,067	72	61.96
79.	(66) MAYACAMA G.C. Santa Rosa, Calif. / Jack Nicklaus (2001)	6,785	72	61.94
80.	(New) BANDON TRAILS	6,706	71	61.94

	Bandon, Ore. / Bill Coore & Ben Crenshaw (2005)	6.880	70	61.82
81.	(33) QUAKER RIDGE G.C. Scarsdale, N.Y. / A.W. Tillinghast (1918)	7.314	72	61.76
82.	(81) THE ESTANCIA CLUB Scottsdale / Tom Fazio (1995)	7.258	72	61.74
83.	(New) EAGLE POINT G.C. Wilmington, N.C. / Tom Fazio (2000)	7.003	72	61.73
84.	(76) SAHALEE C.C. (South/North) Sammamish, Wash. / Ted Robinson (1969)	7.050	72	61.57
85.	(98) KIAWAH ISLAND CLUB (Casique) Kiawah Island, S.C. / Tom Watson (2000)	6.403	72	61.57
86.	(72) MAIDSTONE CLUB East Hampton, N.Y. / Willie Park Jr. & Jack Park (1924)	7.331	72	61.53
87.	(91) SAGE VALLEY G.C. Grantville, S.C. / Tom Fazio (2001)	6.659	71	61.47
88.	(57) SOMERSET HILLS C.C. Bernardsville, N.J. / A.W. Tillinghast (1918)	7.159	72	61.46
89.	(67) BLACK DIAMOND (Quarry) Lecanto, Fla. / Tom Fazio (1988)	7.250	72	61.38
90.	(83) TULLYMORE G.C. Stanwood, Mich. / Jim Engh (2001)	7.360	72	61.29
91.	(89) HAZELTINE NATIONAL G.C. Chaska, Minn. / Robert Trent Jones (1962)	7.215	72	61.27
92.	(71) CALUSA PINES G.C. Naples, Fla. / Michael Hurdzan & Dana Fry (2001)	7.340	72	61.20
93.	(92) SYCAMORE HILLS G.C. Fort Wayne, Ind. / Jack Nicklaus (1989)	6.955	70	61.18
94.	(90) HUDSON NATIONAL G.C. Croton-on-Hudson, N.Y. / Tom Fazio (1996)	7.540	72	61.15
95.	(68) VALHALLA G.C. Louisville / Jack Nicklaus (1986)	7.044	72	61.00
96.	(73) SANCTUARY Sedalia, Colo. / Jim Engh (1997)	7.321	72	60.87
97.	(75) OCEAN FOREST G.C. Sea Island, Ga. / Rees Jones (1995)	7.101	72	60.85
98.	(65) GRANDFATHER G. & C.C. Linville, N.C. / Ellis Maples (1968)	7.405	72	60.82
99.	(69) BLACKWOLF RUN (River) Kohler, Wis. / Pete Dye (1990)	7.516	72	60.81
100.	(New) CROOKED STICK G.C. Carmel, Ind. / Pete Dye (1984)			

Keywords: AMERICA'S 100 GREATEST GOLF COURSES, GOLF COURSE RANKINGS, 2009-10, AUGUSTA NATIONAL, NATIONAL GOLF LINKS, PINE VALLEY.

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HALL OF FAME FACT

Alister MacKenzie developed the groundbreaking camouflage techniques employed by the British military during WWI

SCORE CARD

Other Accomplishments:

Codified 13 features of an ideal golf course
Credited with more than 400 designs or redesigns
Designs include Augusta National, Cypress Point, Crystal Downs, Lahinch, Royal Melbourne, Pasatiempo and Yarra Yarra

World Golf Hall of Fame Profile: Alister MacKenzie

Augusta National, Cypress Point, Royal Melbourne, Pasatiempo, and Crystal Downs all have two things in common - the golf courses were designed by Alister MacKenzie and have become veritable cathedrals of the game.

Former United States Golf Association President Sandy Tatum calls Cypress Point "the Sistine Chapel of Golf" and few would argue with him. Since opening in 1928, Cypress Point's 16th hole has been the most photogenic in the world. Initially, MacKenzie considered making 16 a do-or-die par 4, but he was convinced otherwise by U.S. Women's Amateur champion Marlon Hollins.

"The amazing thrill of driving successfully over the ocean at the sixteenth hole at Cypress Point," he said, "more than compensates for the loss of a dozen balls."

Every April, the golf world descends on perhaps MacKenzie's best known course for The Masters. The greatest player of his generation, Bobby Jones, handpicked MacKenzie to design Augusta National. When Jones was upset in the first round of the 1929 U.S. Amateur at Pebble Beach, he played Cypress Point and marveled at the layout. When they met, the pair realized their shared affection for the Old Course at St. Andrews, where Jones won 1920 British Amateur and the 1927 British Open. In 1923, MacKenzie was hired by the Royal and Ancient Golf Club to survey the Old Course. MacKenzie's map hangs in the Royal and Ancient clubhouse to this day.

A wonderful partnership was formed. "MacKenzie and I managed to work as a completely sympathetic team," Jones wrote in *Golf is My Game*. "Of



course, there was never any question that he was the architect and I his advisor and consultant." With Jones hitting test shots at his side, MacKenzie created the perfect puzzle for the masters of the game. The hand of man is unobtrusive, the beauty of the course is ever-present, and despite the changes in the landscape wrought by the passing of time and efforts to stay current with technology, there is not jarring artificiality, only a serene naturalness. Sadly, MacKenzie never got to see the final product of his masterpiece. He died before the club opened in 1934.


Like the artist Vincent Van Gogh, MacKenzie's work has been better appreciated following his death. Royal Melbourne has been called the best course south of the equator. Routinely 10 of his courses are rated in the top 100 in the world by the major golf magazines.

MacKenzie's book, *Golf Architecture*, published in 1920, was the first to present and explain the fundamentals of golf course design. MacKenzie combined modest golf holes with more heroic challenges, always allowing room for the lesser player to enjoy the game.

MacKenzie's forte was his greens. He refrained from flattening natural undulations and contrived to create artificial undulations that were "indistinguishable from nature." MacKenzie practiced before the era of bulldozers, which left him little capacity to force golf holes where they didn't belong. His approach to providing fair and strategic golf without disrupting the site is a model for golf course design that lasts to this day.

Originally a surgeon in England, MacKenzie served in the Boer War and World War I. MacKenzie abandoned medicine and joined H.S. Colt, the first architect to devote a career solely to designing golf courses, and began working in the British Isles. His greatest work was to come after he immigrated to the U.S. in the early 1920s. By the end of his career MacKenzie had laid out some 400 golf courses.

MacKenzie died of heart failure on January 6, 1934 in Santa Cruz, Calif. His ashes were spread over the Pasatiempo golf course. He left behind a wonderful legacy of golf architecture. During his final years, he wrote a book *The Spirit of St. Andrews*, and it included a foreword by Bobby Jones. It was never published during his lifetime, but a copy was found by his step-grandson and was published in 1995. It gave those who admire his work one last treasure from a man whose golf courses will be treasured for generations to come.

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MacKenzie's Sharp Park Under Siege **A classic Depression-Era public seaside links, designed by a master, is in jeopardy**

by Bo Links and Richard Harris

Sharp Park, located on Sausal Beach in the San Francisco coastside suburb of Pacifica, shares the distinction with the Eden Course at St. Andrews, as the world's only Alister MacKenzie-designed, municipal seaside golf links. But this rare and beautiful golf gem, which opened in 1932, is today under relentless political attack by a tag-team of golf-skeptics and environmental absolutists, who are demanding that the City of San Francisco plow the golf course under and replace it with a wetlands restoration project.

To save this important golf legacy, the national and international golf communities will have to rise to the occasion.



MacKenzie transformed these dunes into:

A Great Walk, Endangered

At the same time San Francisco is preparing to host the 2009 President's Cup in October at another great public course (Hiding Park), the city's Board of Supervisors have directed the Recreation and Park Department to study the alternative possibilities of (1) closing Sharp Park, (2) reducing it to 9 holes, or (3) preserving and modifying the 18-hole course to create new habitat for threatened frog and snake species which now share the property with the golfers.

To avert the international ineptness of President's Cup media coverage, officials at Rec and Park are waiting "until after the President's Cup press bus rolls out of town" before they make the study public.

In the meantime, Bay Area golf enthusiasts, historic preservationists, including the Washington, D.C.-based cultural Landscape Foundation^{1,2}, and others who treasure Sharp Park, including Pacifica Mayor Julie Lancelle, are fighting to rescue Dr. MacKenzie's mini masterpiece. As of this writing, the battle for Sharp Park has been joined. The outcome "with implications for golfers and golf courses everywhere" hangs in the balance.

How in the world did we get to this point? And what can be done about it?



one of America's great cultural landscapes.

The Gold Rush, A Gift, and The Making of Sharp Park

Sharp Park Golf Course occupies approximately 120 acres of a 400-acre park "most of it forested wilderness" bequeathed to the City of San Francisco in 1917 by the executors of the estate of Honora Sharp, the widow of George Sharp, a prominent San Francisco attorney who sailed around Cape Horn and arrived in San Francisco in 1849. He made a fortune during and after the Gold Rush but dropped dead in a local courtroom while pleading a case in 1862. The gift from Mrs. Sharp's estate is subject to the condition that the property will revert to the Sharp family heirs unless it is used exclusively for a public playground or park.

Historic photographs show that before the golf course, the land was predominantly a barren and deserted stretch of sand dunes surrounding the Laguna Ja (Spanish for salty lake), a brackish lagoon located in an area designated on the 1892 US Geological Service topographic map as Salt Valley.

In 1930, when San Francisco's two existing public courses at Lincoln Park and Harding Park were oversubscribed with enthusiastic golfers, the man who created Golden Gate Park had a brainstorm. Why not build a third course on the land that had been donated by Mrs. Sharp? So John McLaren, the legendary steward of San Francisco open space and parkland, floated the idea of a seaside public golf course at Sharp Park. McLaren's handpicked architect, Dr. Alister MacKenzie, was retained by unanimous vote of the San Francisco Board of Supervisors to build the City's third municipal course in the dunes at Salsadero Beach.



You will never see a more eclectic group of golfers anywhere.

MacKenzie was by then a Bay Area resident, with an office in Oakland, and a recent string of Northern California architectural successes, including Cypress Point (1928), Palatiempo (1929), Claremont (Oakland, 1929, remodel), Lake Merced (Daily City, remodel 1928-29), California Golf Club (South San

Fransdon, remodel 1929), and Meadow Club (Fairfax, 1926)

Dr. MacKenzie designed Sharp Park in 1930-31, leaving construction supervision to his partners Chandler Egan (two-time U.S. Amateur champion, 1904 Olympic golf silver medalist, and designer of a string of outstanding courses in Oregon and Washington) and Robert Hunter, both of whom worked with MacKenzie when he remodeled Pebble Beach for the 1929 U.S. Amateur Championship. They were joined by Jack Fleming, who had been the construction foreman at Cypress Point.

The Good Doctor's Golf Prescription: beauty, fun, accessibility and pleasurable excitement

Born in 1870 in Yorkshire, England, Alister MacKenzie received a medical education at Cambridge, and served as a British Army surgeon in the Second Boer War in South Africa in the 1890s. He later quit the practice of medicine and went into partnership in turn-of-the-20th-century London with H.S. Colt, the first-ever business dedicated solely to golf architecture.

One of the reasons why I, a medical man, decided to give up medicine and take to golf architecture was my firm conviction of the extraordinary influence on health of pleasurable excitement, especially when combined with fresh air and exercise, MacKenzie explained. How frequently have I with great difficulty persuaded patients who were never off my doorstep to take up golf, and how rarely, if ever, have I seen them in my consulting room since . . .

As consulting architect at St. Andrews in the early 1920s, MacKenzie was the first to chart the swales, hollows and pits which characterize the fairways of the Old Course. Golf in its early days was always played on commons or links land which bordered the sea, MacKenzie explained. The natural characteristics of this type of land made it easily the most suitable for the game . . .

Golfers the world over have come to know Dr. MacKenzie as one of history's greatest golf architects, whose courses circle the globe from New Zealand (Tirangia) to Australia (Royal Melbourne and New South Wales) to Argentina (The Jockey Club) to England (Alwoodly and Moorstown), Ireland (Cork and Lahinch) and, of course, Scotland (Balgownie, and his work at St. Andrews, including assisting H.S. Colt in designing the Eden Course).

MacKenzie in America

In the United States, Dr. MacKenzie worked primarily in the Midwest (where he built university courses at the University of Michigan and Ohio State, and the great layout at Crystal Downs in Northern Michigan) and California. Indeed, his final resting place is Santa Cruz, overlooking Monterey Bay, 90 miles south of San Francisco, where his ashes were scattered at Pasatiempo, the wonderful up-and-down course he built for Marion Hollins. Bobby Jones played Pasatiempo on opening day in 1929 and it was that experience, as well as the fact that MacKenzie (working again for Mrs. Hollins) had also recently designed the amazing new course at nearby Cypress Point, that caused the game's greatest amateur (and some say greatest player) to retain MacKenzie to construct Jones's dream course, Augusta National, on an abandoned nursery in rural Georgia.

In 1920, MacKenzie published "Golf Architecture," the first-ever book on the subject of golf course design, in which he enumerated key principles of golf architecture, including:

- The course should have beautiful surroundings
- "[T]he course should be arranged so that the weaker player with the loss of a stroke, or portion of a stroke, shall always have an alternate route open to him"
- "[T]here should be a complete absence of the annoyance and irritation caused by the necessity of searching for lost balls" and
- "[T]he long handicap player or even the absolute beginner should be able to enjoy his round in spite of the fact that he is piling up a big score" . . .

Dr. MacKenzie was a devotee of natural beauty, and an artist in the tradition of Lancelot Capability Brown, the 17th Century father of English naturalistic landscape design. The chief object of every golf architect or greenkeeper worth his salt, MacKenzie said, "is to imitate the beauties of nature so closely as to make his work indistinguishable from Nature herself" . . .

"My reputation," he continued, "has been based on the fact that I have endeavored to conserve the existing natural features and, where these were lacking, to create formations in the spirit of nature herself. In other words, while always keeping uppermost the provision of a splendid test of golf, I have striven to achieve beauty. . . . This excellence of design is more fully realized by the players, but nevertheless it is constantly exercising a subconscious influence upon him and in course of time he grows to identify with a course as all works of beauty must be eventually felt and admired." . . .

An ardent advocate of municipal golf, MacKenzie hoped to live to see the day when there are the crowds of municipal courses, as in Scotland, cropping up all over the world. There can be no possible reason against, and there is every reason in favor of, municipal courses . . .

Unfortunately for public golfers, MacKenzie worked mostly for private developers, so very few of his courses are publicly accessible. Most golfers only hear about MacKenzie's greatness when the world's best play the Masters every April at Augusta National. Similarly, most American golfers never get closer to a genuine seaside links than their couches and TV sets every summer during the British Open.

The Miracle at Salada Beach

But for the past 77 years, lucky San Francisco muni players and visitors have had Sharp Park "the Pacific Coast's answer to North Berwick," a place where a remarkably diverse golfing clientele of all races, languages, social classes, and genders pull their carts, hit their shots, and enjoy a beer and a sandwich in a charming 19th hole pub, for a modest weekday greens fee under \$30. The Spanish hacienda-style clubhouse was a Works Progress Administration construction project, designed by an associate of Willis Polk, who in turn was head of the San Francisco office of Chicago-based master planner Daniel Burnham. In other words, when constructing Sharp Park "in the dark days of the Great Depression" San Francisco went first-class all the way.



The clubhouse at Sharp Park is a WPA classic.

As for the course design, Dr. MacKenzie made the most of the opportunity handed him by John McLaren. Deploying state-of-the-art machinery and innovative engineering techniques, he dredged the Laguna Salada, converting it from a brackish marsh into a fresh water lake, then set about surrounding the lagoon with golf holes. Sharp Park incorporates MacKenzie's prescription that a golf course should be a place of surpassing natural beauty, and that

the game should foremost be a fun and healthful pastime, equally playable and enjoyable by persons of all abilities.

At Sharp Park, MacKenzie combined features in one place that he had scattered over other layouts. His original design included holes featuring multiple tees (Nos. 2, 5, and 14), double fairways (Nos. 5 & 10), cross bunkering (No. 16), fairways in the sand dunes (Nos. 3 & 7) and several holes bordering the inland lake (Nos. 4, 5, 8, 9, 10 and 11). There were tees on spits in the water, and island landing areas. Two of the holes were clearly inspired by MacKenzie's Lido Hole which catapulted him to fame in 1914 when he won a design contest sponsored by *Country Life* magazine.



Looking at Sharp Park is like viewing a John Constable painting of an English landscape.

The plans were drawn in 1930-31, and while MacKenzie was attending to business in Europe, his colleague Chandler Egan supervised construction. Egan marveled at the site's remarkable seascape, prompting local reporters to refer to the course as a second St. Andrews. Everyone associated with the project fully intended it to become the finest municipal golf course in America. ¹²

5. local press reports analogized the effort to build Sharp Park as nothing less than an attempt to bring a touch of Scottish coastland on the Pacific. One report said the joint effort of McLaren and MacKenzie would create a seaside municipal course of outstanding character akin to those of the English and Scottish coasts. ¹³

When the course opened for play on April 16, 1932 it played 6,173 yards to a par of 71. The local press echoed Egan's theme, noting that the course presented a thorough test of golf and a perfect seaside layout. One report commented that [s]cureque dunes and a lagoon or so dot the landscape to add their charm and hazards to the golfer's day. ¹⁴

Modern architectural scholars have come to regard MacKenzie's design at Sharp Park as one of America's greatest public courses. Daniel Waxler, America's leading exponent of lost courses, has lauded Sharp Park as a marvelous golf course, featuring seaside holes, two double fairways, a large lake, and a cypress-dotted setting fairly reminiscent of Monterey. It was, in short, a municipal masterpiece. ¹⁵ In a call for restoration, Waxler observed, after surveying hundreds of public and private courses from coast to coast, that the original Sharp Park would have to stand well out in front as America's finest municipal golf links. ¹⁶

Tom Doak, perhaps the country's most noted authority on golf course renovation, has cited Sharp Park as a milestone, evidencing an evolution in Dr. MacKenzie's style even at the height of his fame as the country's most sought-after golf architect. ¹⁷

One of today's most prolific golf architecture critics, Geoff Shackelford, echoes these themes, saying, "Certainly no municipal-course design has ever come close to matching the overall package of beauty and affordable links-style golf." ¹⁸

MacKenzie himself, in his comprehensive (and long lost) manuscript, *The Spirit of St. Andrews*, praised Sharp Park and San Francisco's public golf facilities in general:

"The municipal courses in San Francisco are far superior to most municipal courses. The newest, which we constructed at Sharp Park, was made on land reclaimed from the sea. The course now has a great resemblance to real links land." ¹⁹



This sea wall protects the course from the ocean, which is only a wedge shot away. Two of MacKenzie's original holes were right on the beach, but erosion and flooding forced the City to move inland with the construction of four new holes in 1941.

Urban legend long had it that portions of the original course were washed away in the 1930s by powerful winter storms. But in truth, the course weathered the storms until 1941, when the original strand holes (Nos. 3 and 7) were replaced by an unreinforced sea wall, and four excellent new holes were built by MacKenzie's associate Jack Fleming, who by then had become San Francisco's supervisor of golf. The new holes were built (following MacKenzie's death in 1934) in a canyon east of the rest of the golf course, located on the other side of what was then state Highway 1. (An aerial photograph taken in March 1941 shows the original course still intact; the picture was taken just prior to the building of Fleming's four new holes.)

Sharp Park Today

In 2009, twelve of Sharp Park's current 18 holes are MacKenzie originals, and an additional two holes lie in original fairways, but without original greens. While the course has seen trees mature, traps grassed in, a stream or two culverted, and withstood other relatively minor insults of the golf course aging process, the unmistakable fact is that 14 of 18 holes track MacKenzie's original routing. A comparison of the present-day course with the original routing maps proves the point, as do the hole-by-hole descriptions penned by Jack Fleming for one of the San Francisco newspapers for the course opening in 1932.^[12]

Those familiar with MacKenzie's style will immediately recognize the Good Doctor's trademark heaving, lurching greens at current holes 1, 2, 3, 9, 10, 11, 13, 14, 15, 17, and 18. Fairway undulations and mounds on current holes 1, 3, 9, 10, 14, and 16 mimic the famous fairway bumps and hollows at the Old Course at St. Andrews. And the deception bunker 50 yards in front of the right side of the current 14th green is a classic bit of MacKenzie's renowned use of camouflage principles.

A walking tour of the current course not only reveals the original green contours and the locations of original bunkers, but a detour through the ice-plant strewn sand dunes in the shadow of the sea wall also reveals three of the lost holes abandoned in 1941 when the new holes were built east of Highway 1.



The lost holes are there, waiting to be reclaimed!

Overarching the design details at Sharp Park is MacKenzie's beautiful landscape architecture. The Monterey Cypress that define several fairways, frame picturesque views of the mountains and headlands surrounding the low-lying golf course. It is as if the Good Doctor had set the fortunate golfer down in the middle of an early 19th Century English romantic landscape painting by John Constable.



This picture shows portions of the original 4th and 8th holes.

Although time and underfunded maintenance have taken the edge off many of the original features, Sharp Park is still unmistakably a great golf course, a MacKenzie classic, and an American masterpiece. But it is more than that. Sharp Park incorporates Dr. MacKenzie's faith in the capacity of public golf to help enormously in increasing the health, the vitality and the prosperity of nations. It is a public golf companion piece to the Golden Gate Bridge, a monumental engineering and artistic feat, created in the depths of the Great Depression by a great artist, to inspire and uplift the public spirit.



This shot is in the vicinity of the original (and lost) fourth green. Are we standing in a MacKenzie bunker?

In the throes of the Great Recession of the early 21st Century, the Good Doctor's Golf Prescription remains timely.

Who Would Want to Destroy Such a Place?

course is real estate. Those who hold it eventually have to contend with those who covet it. That time has arrived for Sharp Park.

The charge to destroy the golf course is led by powerful forces, including the San Francisco Neighborhood Parks Council, a public parks advocacy organization, funded partly by taxpayer dollars, whose founder and spokeswoman Isabel Wade has publicly denigrated golf as "predominantly a male sport and frankly... a white sport" and not a family-oriented sport that you do with other folks. Joining in the attack is the Tucson-based Center for Biological Diversity, a controversial organization specializing in Endangered Species Act litigation, which in September, 2008 issued a notice-of-intent-to-sue letter to the City of San Francisco, alleging depredations to the endangered San Francisco Garter Snake and California Red-legged Frog at the golf course. The running drama of the CBD's threats and its related campaign to turn the golf course into a dedicated frog and snake preserve, the San Francisco Board of

Supervisors May, 2008 Ordinances directing study of development alternatives at Sharp Park, and the golf community's reaction, is described in detail in recent news reports. ^[21]

To be sure, the snake and frog are federally-listed, and are reputed to live in and about the ponds on the golf course, and on land adjacent to the course. And for their part, the golfers and golf course supporters think that golfers, snakes, frogs, and All God's Creatures can live and let live at Sharp Park, and that the creatures native habitat and the historic golf course can both be dramatically improved, for the benefit of all.

But there is considerable irony here. The snake and frog are freshwater species, and historic photos show that before the golf course, the area was mostly barren dunes surrounding the brackish Laguna Salada. According to scientific studies, Laguna Salada prior to the golf course was unlikely to have been home to either species, due to the high salt content of the water. ^[22] And the first scientific records of the San Francisco Garter Snake at the property are studies made in the mid-1940s ^[23] long after golf course irrigation and the construction of the first sea wall in 1941 had changed Sharp Park's hydrology from brackish to freshwater.



A west coast version of The Old Course.

So now the environmental absolutists campaign to drive the golfers off and close the very golf course that attracted the frog and snake in the first place. strikes golfers as beyond common sense, and beyond responsible science. It is Out of Bounds.

Reflections – And a Call to Action

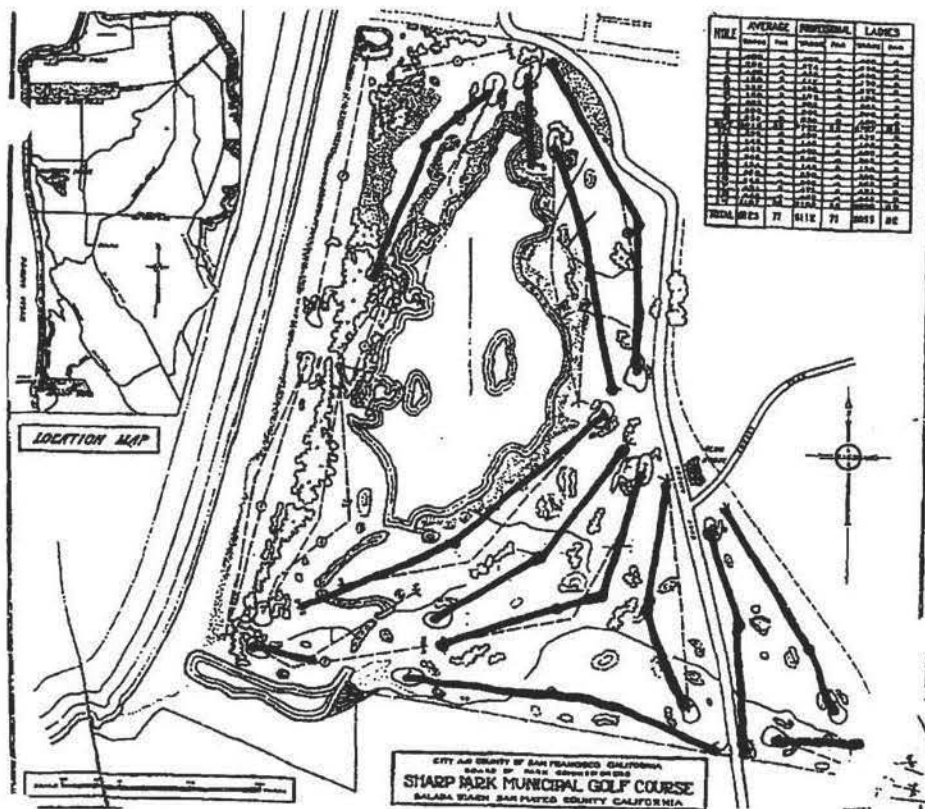
Whether the golfers will be able to keep the course or whether it will be converted to a frog and snake preserve are real political questions in San Francisco and in Pacifica.

Unless the golfing world stands up to demand preservation of Dr. MacKenzie's historic seaside public links, and unless money is raised within the golfing community to help preserve golf at Sharp Park while at the same time enhancing natural habitat for the endangered species in and about the property, this great work of golf's greatest architect will be lost forever.

If a golf course with Sharp Park's historic legacy and devoted multicultural clientele can be destroyed by a combination of anti-golf prejudice and over-aggressive use of the Endangered Species Act, no golf course is safe. For these reasons, the San Francisco Public Golf Alliance solicits the support of golfers everywhere to save this municipal masterpiece.

For more information, contact either Bo Links (bo@boandbo.com) or Richard Harris (richard@sanfranciscogolf.com) or go to our website (www.sfpga.org). Once there, sign up for updates, make your voice heard, and contribute your support to the cause.

HOLE DESCRIPTIONS



As shown on this map of the original MacKenzie layout 12 of the original holes are still in play. A portion of another hole is in use, and remnants of several "lost holes" remain in the dunes west of the lagoon.

Written by Jack Fleming

As published in the San Francisco Call-Bulletin, 1932

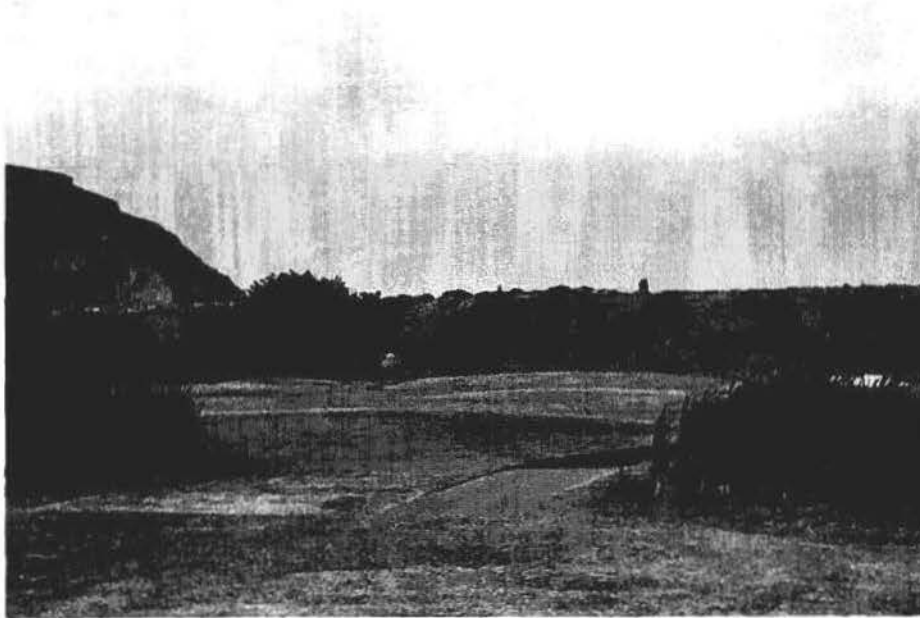
Hole 1 (current 11th hole) - 409 yards - Par 4

A fairly long two shot hole slightly dog legged. No particular difficulties to a straight hitter.



This was the original opening hole, and a last at that: over 400 yards back in 1932:

Hole 2 (current 12th hole, shortened to a 3-par) – 262 yards – Par 4



This hole original was a short par 4 with double tees and a routing that crossed a corner of the lagoon. Today, it is a stout three par, backed against the sea wall with ocean breezes always in play.

A short two shotter. Drive must clear an arm of lake at about 100 yards, but a wide fairway available at 175 yards out. Green set back against trees and trapped in right front.

Hole 3 (lost) – 420 yards – Par 4

One of the ocean holes constructed on the beach in a slight depression bounded by sand and sand grass embankment on left, trees on right. Entrance to green slightly advantageous from left on account of traps.

Hole 4 (lost) – 120 yards, Par 3

A one shotter. Green very large, but well trapped in front and right, trees left and rear.

Hole 5 (current 17th hole) – 327 yards – Par 4



This hole was one of two that MacKenzie modeled after his famous "Lido Hole" the design entry he submitted in 1914 to Country Life magazine that launched his career.

A lakeside hole and one of the most interesting holes on the course, similar to Dr. MacKenzie's ideal golf hole [a reference to the Lido Design]. Three tees, four routes. Easy route probably will cost at least one extra stroke to get on while the other combinations of tees and routes give rewards proportionate to their respective risks.



This hole was one of two that MacKenzie modeled after his famous "Lido Hole" the design entry he submitted in 1914 to Country Life magazine that launched his career.

Hole 8 (lost) - 156 yards - Par 3

A difficult par. Green well trapped.

Hole 7 (lost; percolated current 15th hole) - 385 yards - Par 4

Similar to No. 2, but in opposite direction. A trap endangers the short player on his second, but properly played as a two shot hole a par is possible.

Hole 6 (lost) - 396 yards - Par 4

ing, quite difficult for two shots. Drive is blind and over trees if played close to get in opening for a good second. Plenty of fairway, however, for who play short and do not care to risk trees on right for possible par. The wide play practically requires three strokes to get on.

Hole 9 (current 13th hole) - 538 yards - Par 5



modern day 13th as viewed from behind the old 9th tee.

side hole with wide, sandy beach on water side. Back tee should be used by all, as water carry is very short and close to tee. Requires three good shots to get on if dogleg is played, but possibly a very long sure approach will get in under par.

Hole 10 (current 14th hole - left fairway now part of marsh) - 382 yards - Par 4



This is the other hole MacKenzie modeled after his Lido Hole. The original design, like that of the original 5th hole, featured two fairways. The one on the left, closest to the lagoon, was a peninsula much like the Lido design. It offered the shorter route to the green, a temptation for the adventurous player. Today, the lagoon feature has been lost, but the hole still presents a challenge as it follows a gentle curve around the hazard. A mound and camouflage bunker protect the green.

One of the best holes, two tees, four possible routes, sand and water carries optional. The ideal shot is an accurately placed ball on an island with a water carry on both first and second shots. If well placed on first, the green opens well for a pitch and run second. All other approaches to the green are guarded.

Hole 11 (currently 15th hole) – 142 yards – Par 3

A fairway-less short hole. Water and sand carry trap green. Green, however, is long and should receive an average straight ball easily.

Hole 12 (current 18th hole) – 486 yards – Par 5

Fairway flat, double dogleg. Not difficult except to get two good straight drives in succession.

Hole 13 (current 2nd hole) – 345 yards – Par 4

Passing the clubhouse from No. 12 green to No. 13 tee. The thirteenth, fourteenth and fifteenth are all holes of a different type than the lakeside and ocean holes. No. 13 is an upland type of hole of average difficulty. The green is well trapped.

Hole 14 (shortened, current 8th hole) – 134 yards – Par 3



This sporty par 4 was originally the 14th hole. The green is well protected and one can readily see how MacKenzie's original green must have heaved and flowed with the bumps and hollows that are there today.

This short hole has two tees. The tee with the carry across the creek opens into green easily, while on crossing creek to the other tee a more difficult shot over a trap at the green is encountered. Directly into prevailing winds.

Hole 15 (current 2nd hole) - 339 yards - Par 4



Originally the 15th hole, this is another mid-range four par to a green that was a MacKenzie classic: rolling and undulating to provide no end of excitement for players of all abilities. There are indications on the ground today to indicate that the original green most likely wrapped around the bunker, which itself was shaped somewhat like a cloud another MacKenzie hallmark.

Similar to No. 12. At present along the edge of the county road, which it is planned to re-locate. No. 15 green is near clubhouse

Hole 16 (current 1st hole) - 363 yards - Par 4

a hole with two optional routes and a creek to cross

Hole 17 (current 6th hole) - 471 yards - Par 5

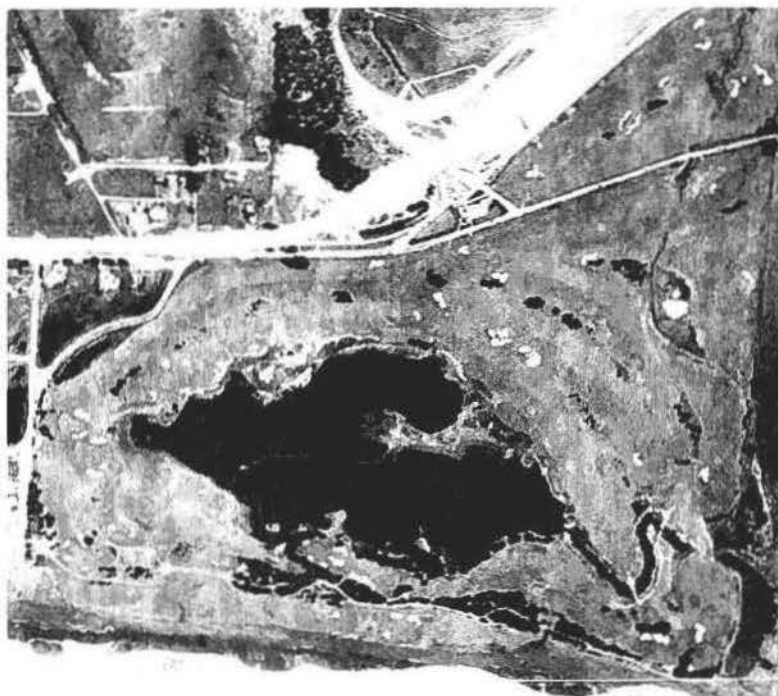


Hole 5 was the original 17th hole. The green is framed beautifully by cypress trees, planted by John McLaren, the man who created Golden Gate Park. MacKenzie credited in planning around the golf course to enhance the beauty of the natural landscape.

Finishing hole down the south property line. The green is on a 15 foot hill.

Hole 18 (current 10th hole) - 443 yards - Par 4

The finishing hole is long and hazardous if not successfully played on both long shots, but the green is wide, open and nicely rolling in order to lend interest to the many thrilling final decisions which will no doubt be made on it. A clump of trees guards the green on the left.



This 1941 aerial photo shows that the urban legend of the course washing away shortly after it opened, is a myth. The picture shows the original course almost fully intact prior to the creation of four new holes inland, on the other side of a state highway.

The End

[1] Landside, The Cultural Landscape Foundation, *Alister MacKenzie's Sharp Park*, July, 2009. (Note: links to this and all sources cited can be found in the News and Resources section of the San Francisco Public Golf Alliance website: <http://www.sfpugalliance.com/news.html>)

[2] Williams & Associates, *Laguna Salada Resource Enhancement Plan*, (June, 1992), at pp 2-3, and Fig. 2.

[3] Alister MacKenzie, *The Spirit of St. Andrews*, (Sleeping Bear Press 1995) at p. 246.

[4] *Id.* at p. 1.

[5] *Id.* at p. 41-42.

[6] *Id.* at p. 50.

[7] *Id.* at p. 51.

[8] *Id.* at p. 250.

[9] *Id.* Chandler Egan Praises Possibilities of Sharp Park Golf Links (sub-head: New Municipal Course Ideal Claims Expert, *San Francisco Chronicle*, February 26, 1930, page H-3).

[10] Appropriation For Third S.F. Golf Course Receives Ok, *San Francisco Examiner*, February 22, 1930, page 15.

[11] *Id.* New San Francisco Course Opens, *San Francisco Examiner*, April 16, 1932, page 17.

[12] *Waxler, The Missing Links* (Sleeping Bear Press 2001) at p. 113.

[13] *Id.* at p. 115.

[14] *Dook, The Life and Work of Dr. Alister MacKenzie* (Sleeping Bear Press 2001) at p. 154.

[15] Shackelford, *Sharply Divided*, *Golf World*, July 20, 2009, at p. 31.

[16] MacKenzie, *The Spirit of St. Andrews* (*supra*, fn.3) at p. 171-172.

[17] *Yee Topics* (sub-head: Here's What You Find at Sharps [sic] Park - Fleming Describes City's Newest Layout), *San Francisco Call-Bulletin*, March-April 1932. The hole-by-hole descriptions are included at the end of this article.

[18] *The Spirit of St. Andrews* (*supra*, fn. 3) at pp. 171-172.

[19] *Id.* at p. 250.

[20] KQED Radio, Aug. 31, 2007, *Alister MacKenzie's Sharp Park*.

[21] KGO TV (ABC), *The Fate of Sharp Park*, Aug. 12, 2009, Geoff Shackelford, *Sharply Divided*, (*supra*, fn. 15), Curt Sampson, *Sharp Elbow: Environmentalists and Golfers Square Off Over Sharp Park*, *Sports Illustrated*, May 11, 2009 at pp. G-3-G-5.

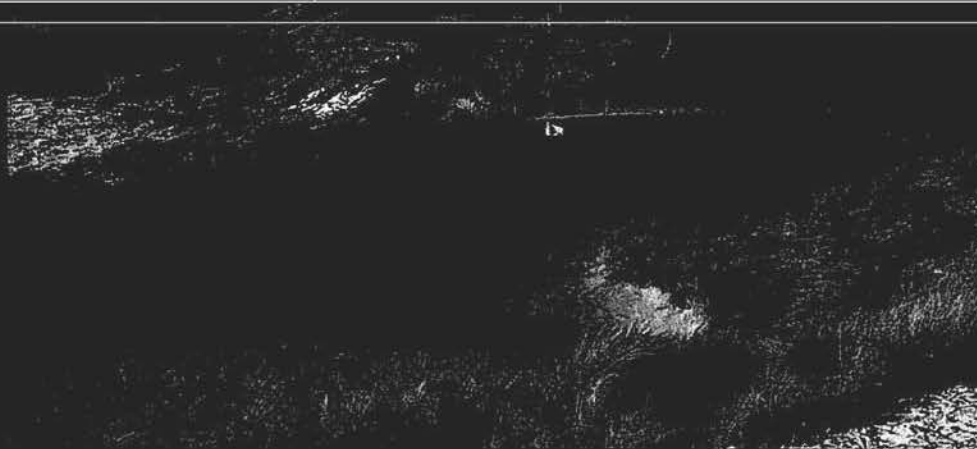
[22] Williams & Associates, *Laguna Salada Resource Enhancement Plan*, (*supra*, fn. 2), at pp. 2-3.

[23] Swaim Biological, *Sharp Park Wildlife Surveys*, etc. Dec. 4, 2008, at p. 1.3-1.4.

THE END

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The Architects of **GOLF**



A Survey of Golf Course Design from Its Beginnings to the Present, with an Encyclopedic Listing of Golf Architects and Their Courses. A Completely Revised and Expanded Edition of *The Golf Course*.

**Geoffrey S. Cornish
and Ronald E. Whitten**

next teeing ground people sometimes forget and commence playing some other game.

8. Hills on a golf course are a detriment. Mountain climbing is a sport in itself and has no place on a golf course. Trees in the course are also a serious defect, and even when in close proximity prove a detriment.
9. Glaring artificiality of any kind detracts from the fascination of the game.

Like in life, however, Macdonald despaired of both the game of golf and golf architecture. In one of his last pieces of correspondence, to golf architect Perry Maxwell, he wrote, "Young man, you have the idea of a real golf course, and I am sorry I can't encourage your enthusiasm by going to see what is undoubtedly a most wonderful and ideal location, but I can't. I tell you I am through. I wouldn't walk around the block to see it for I don't want to get interested in another golf project, however fine. But I do wish you the best of luck."

Courses by Charles Blair Macdonald:

- Connecticut: Yale University GC (1926), with Seth Raynor, Charles Banks and Ralph Barton.
- Illinois: Chicago GC (1895); Downers Grove GC [FKA Chicago GC] (9 1893).
- Maryland: Gibson Island GC (9 1922, NLE), with Seth Raynor.
- Missouri: St. Louis CC (1914), with Seth Raynor.
- New York: Blind Brook C (routing 1915), with Seth Raynor; [The] Creek C (1925), with Seth Raynor; Deepdale GC (1925, NLE), with Seth Raynor; H. P. Whitney Estate G Cse (NLE), with Seth Raynor; Lido GC (1917, NLE), with Seth Raynor; [The] Links GC (1919, NLE), with Seth Raynor; Moore Estate G Cse (NLE), with Seth Raynor; [The] National Golf Links of America (1911); Otto Kahn Estate G Cse (1925, NLE), with Seth Raynor; Piping Rock C (1913), with Seth Raynor; Sleepy Hollow GC (1914), with Seth Raynor.
- West Virginia: Greenbrier GC (Old White Cse 1915), with Seth Raynor.
- Bermuda: Mid Ocean C (1924), with Seth Raynor, Charles Banks and Ralph Barton.



Alister Mackenzie,
1932 COLLECTION RON
WHITTEN

ALISTER MACKENZIE, M.D. (1870–1934)

BORN: Normanton, Yorkshire, England.
DIED: Santa Cruz, California, at age 63.

Dr. Alister Mackenzie, the son of Highland parents, graduated from Cambridge University with degrees in medicine, natural science and chemistry. In the Boer War he served as a surgeon with the Somerset Light Infantry, where he closely observed and analyzed the ability of Boer soldiers to hide effectively on treeless veldts. After the war he returned to Britain to practice medicine in the city of Leeds.

Just when the good doctor entered the field of golf architecture is unclear. He apparently dabbled in design somewhat in the early 1900s. What is known is that in 1907 golf architect H. S. Colt, on a visit to Leeds, stayed overnight at Mackenzie's home. Impressed with Mackenzie's models of greens and bunkers, Colt invited his collaboration on the design of Alwoodley Golf Club. Over the next few years Mackenzie gradually gave up his medical practice to devote full time to golf course architecture. In 1914 he won first prize in C. B. Macdonald's *Country Life* magazine competition for the best two-shot hole for the proposed Lido GC on Long Island, New York. This competition, judged by golf writer Bernard Darwin, Horace Hutchinson and Herbert Fowler, brought Mackenzie considerable publicity on both sides of the Atlantic.

With the outbreak of war in Europe, Mackenzie returned to medicine as an army surgeon but soon transferred to the Royal Engineers to develop camouflage techniques based on the knowledge he had gained in South Africa. The art and science of camouflage as developed by Mackenzie was credited with saving thousands of lives. Years later Mackenzie observed that successful course design, like camouflage, depended on utilizing natural features to their fullest extent and creating

artificial features that closely imitated nature.

Shortly after the Armistice in 1918, Mackenzie formed a partnership with H. S. Colt and C. H. Alison, but it was short-lived. Reportedly the egos were too great on both sides, and Mackenzie and Colt, though partners on paper, competed on several commissions. A full rift occurred in 1921, but it wasn't until 1928 that Colt got around to formally dissolving Mackenzie's name from the firm. Consequently, a good deal of American courses designed by Colt's partner Hugh Alison also bear Mackenzie's name as architect of record, though there is little evidence that Mackenzie worked on any American designs with either of his partners.

When Mackenzie did finally settle in the United States, he formed brief partnerships with a number of persons, including Robert Hunter, H. Chandler Egan and Perry Maxwell. But despite the temperamental nature of his business acumen, there was no denying the talent of Alister Mackenzie. Cypress Point in California finally established his reputation as a golf course architect and led to his collaboration with the immortal Bobby Jones on the design of Augusta National.

During the 1920s Mackenzie made an extended trip through South America, Australia and New Zealand. He did a number of "paper jobs" that were completed by hastily arranged associates, most notably Australian Alex Russell.

Mackenzie authored *Golf Architecture*, a collection of design lectures he had delivered that was published in 1920. In it, he codified thirteen essential features of an ideal golf course that became standards for course architecture after World War II. They were:

1. The course, where possible, should be arranged in two loops of nine holes.
2. There should be a large proportion of good two-shot holes, two or three drive-and-pitch holes, and at least four one-shot holes.
3. There should be little walking between greens and tees, and the course should be arranged so that in the first instance there is always a slight walk forward from the green to the next tee; then the holes are sufficiently elastic to be lengthened in the future if necessary.

4. The greens and fairways should be sufficiently undulating, but there should be no hill climbing.
5. Every hole should have a different character.
6. There should be a minimum of blindness for the approach shots.
7. The course should have beautiful surroundings, and all the artificial features should have so natural an appearance that a stranger is unable to distinguish them from nature itself.
8. There should be a sufficient number of heroic carries from the tee, but the course should be arranged so that the weaker player with the loss of a stroke or portion of a stroke shall always have an alternate route open to him.
9. There should be infinite variety in the strokes required to play the various holes—interesting brassy shots, iron shots, pitch and run-up shots.
10. There should be a complete absence of the annoyance and irritation caused by the necessity of searching for lost balls.
11. The course should be so interesting that even the plus man is constantly stimulated to improve his game in attempting shots he has hitherto been unable to play.
12. The course should be so arranged so that the long handicap player, or even the absolute beginner, should be able to enjoy his round in spite of the fact that he is piling up a big score.
13. The course should be equally good during winter and summer, the texture of greens and fairways should be perfect, and the approaches should have the same consistency as the greens.

Of all the course architects of the Golden Age of Golf Design, Mackenzie probably exerted the greatest influence on contemporary design.

Courses by Alister Mackenzie:

California: Charlie Chaplin Estate GC (9 Par 3, NLE); Cypress Point C. (1928), with Robert Hunter; Green Hills CC (1930), with Robert Hunter and H. Chandler Egan; Haggin Oaks Muni (South Cse 1932); Harold Lloyd Estate GC (9 Par 3, NLE); [The] Meadow C

(1927), with Robert Hunter; Northwood GC (9 1928), with Robert Hunter; Pasatiempo GC (1929); Pittsburg GC (9), with Robert Hunter; Sharp Park GC (1931); Stockton G&CC; Valley C of Montecito (1928), with Robert Hunter.

Georgia: Augusta National GC (1933), with Robert Tyre Jones, Jr.

Michigan: Crystal Downs CC (1933), with Perry Maxwell; University of Michigan GC (1931), with Perry Maxwell.

Ohio: Ohio State University GC (Gray Cse, routing 1939; Scarlet Cse, routing 1939).

Manitoba: St. Charles CC (North Nine 1930).

Argentina: Jockey C (Blue Cse 1935; Red Cse 1935).

Australia: Australian GC (27 1926); Lake Karrinyup CC (1927), with Alex Russell; New South Wales GC (1928), with Des Soutar; Royal Melbourne GC (West Cse 1931), with Alex Russell; Victoria GC (1927); Yarra Yarra GC (1929), with Alex Russell.

England: Alwoodley GC (1907), with H. S. Colt; Bingley St. Ives GC (1931); Blackpool-Stanley Park GC (1925); Brancepeth Castle GC (1924), with H. S. Colt and C. H. Alison; Cavendish GC (1925); Darlington GC (1909); Felixstowe Ferry GC (1919); Fulford GC (1909); Grange-over-Sands GC (1919); Hadley Wood GC (1922); Low Laithes GC (1925); Marsden GC (9 1921); Moor Allerton GC (1923, NLE); Moortown GC (1909); Oakdale GC (1914); Reddish Vale GC (1912); Scarborough Southcliff GC (1911); Scarcroft GC (1937); Sitwell Park GC (1913); Teignmouth GC (1924); Walsall GC (1909); Wheatley GC (1913); Worcester G&CC (1927).

Ireland: Island GC.

Isle of Man: Douglas Muni (1927).

New Zealand: Heretaunga GC.

Scotland: Hazelhead Muni (Cse No. 1 1927); Pitreavie GC (1923); St. Andrews (Eden Cse 1913), with H. S. Colt.

Uruguay: GC de Uruguay; Punta del Este GC.

Courses remodeled or expanded by Alister Mackenzie:

California: California GC of San Francisco (R.); Claremont CC (R.); Lake Merced G&CC (R. 1929, NLE); Monterey Peninsula CC (Dunes Cse, R.

1928), with Robert Hunter; Redlands CC (R.).

New York: Bayside Links (R. 1932, NLE).

Lake Placid C (Upper Cse, R. 1931).

South Carolina: Palmetto CC (R. 1931).

Argentina: Mar de Plata GC (R. 1930).

Australia: Flinders GC (R. A.2 1926);

Kingston Heath GC (R. 1928); Royal

Adelaide GC (R. 1926); Royal Queens-

land GC (R. 1927); Royal Sydney GC

(R.).

England: Bolton GC (R.); Buxton and

High Peak GC (R.); City of Newcas-

le GC (R.); Harrogate GC (R.); Head-

ingley GC (R.); Ilkley GC (R.);

Manchester GC (R.); Royal St.

George's GC (R.); Saddleworth GC

(R.9 A.9); Seaton Carew GC (R.

1925); Shipley (R.); West Herts GC

(R. 1922); Weston-Super-Mare GC

(R.); Willingdon GC (R. 1925);

Worcestershire GC (R. 1924).

Ireland: Cork GC (R.9 A.9 1927); Den-

las GC (R.9 1927); Galway GC (R.

Lahinch GC (Old Cse, R. A.11 1927).

Muskerry GC (R.).

Isle of Man: Castletown GC (R.).

New Zealand: Titirangi GC (R. 1926).

Scotland: Blairgowrie GC (Rosemount

Cse, R.9 A.9 1927); Duff House R.

GC (R. 1926), with Charles A. Mac-

kenzie; Newtonmore GC (R.); Royal

Troon GC (R. 1907); St. Andrews

Cse, R.).

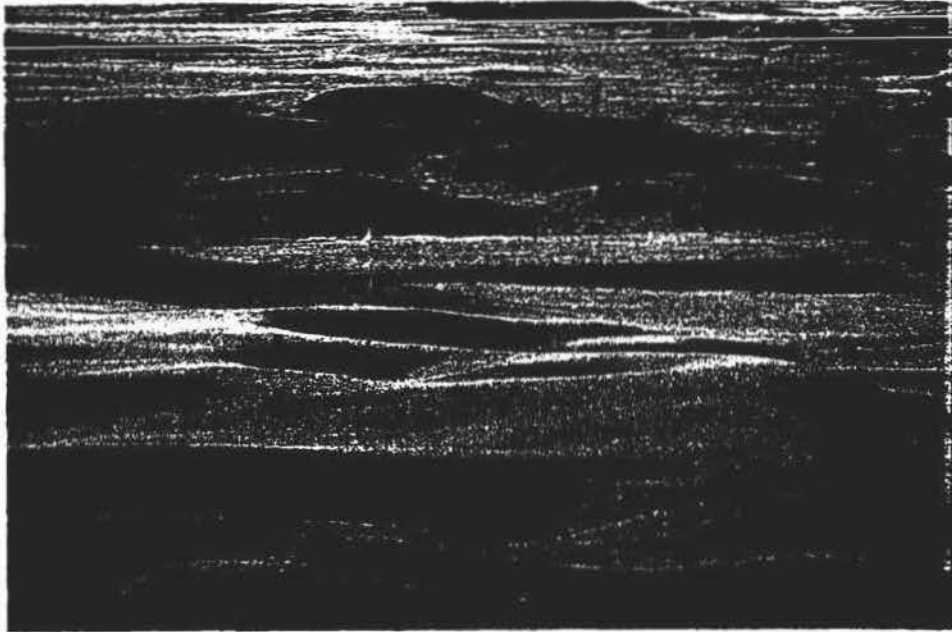
GREGOR MACLEOD MACMILLAN

BORN: Montana.

Following graduation in the early 1900s from the University of Washington with a degree in civil engineering, Greg MacMillan worked as a surveyor for the Tacoma Canal Lumber Company of Seattle. When Balcom headed a group of businessmen organizing the Olympic Golf and Country Club, MacMillan was assigned to oversee the golf course construction. His knowledge impressed Frank James, Western states representative of the course's contractor, William H. Tucker & Son, and after Olympic opened, he hired MacMillan to help design and supervise Tucker projects along the West Coast.

James soon resigned to pursue his golf design career, and MacMillan took his place in the Tucker organization. In the next eight years, he designed and built courses with Tucker in nine Great

The SPIRIT of ST. ANDREWS



Alister MacKenzie

Foreword by Bobby Jones



*The Spirit
of
St. Andrews*

by
Alister MacKenzie

Foreword by
Robert Tyre Jones, Jr.



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« Introduction »

"I have always wanted to live where one could practice shots in one's pyjamas before breakfast, and at Santa Cruz the climate is so delightful that one can play golf every day of the year."

—Dr. A. MacKenzie

It is nearing Christmas 1932 and the place is the cottage that Dr. MacKenzie has built for his wife Hilda on the 6th fairway at Pasatiempo Golf Course. Joining them for the holidays are her son Tony, with his wife and their two sons Philip and Raymund, who have just recently arrived from England. Little more than one year later, on January 6, 1934, the Doctor dies and his ashes are distributed over the golf course.

Alexander MacKenzie was born in England on August 30, 1870 in the town of Normanton, County of York. He was a well-educated man, receiving several degrees from Cambridge and from Leeds, where he practiced medicine before going to South Africa to serve as a civil surgeon in the Boer War. Here he could not help but admire the capacity of the Boers to conceal themselves so effectively. It was these observations that first interested him in "the imitation of nature," and which led to his appointment to establish the British School of Camouflage during World War I.

Although he had played golf in his youth, he did not take up the game seriously until after he received his degrees, when he "developed the disease badly." Yet he did not become a good golfer until into his 60's. He was known as Dr. Alister MacKenzie during his golf course design

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*The Evolution
 of Golf*

Golf, in its early days, was always played on commons or links land which bordered the sea. The natural characteristics of this type of land made it easily the most suitable for the game. It is an interesting fact that sandy gravelly soil which is of little value for agricultural purposes is by far the best type of land for a golf course. Links land, consisting as it does of rolling sand dune country partially covered with gorse, heather, bent and short "rabbity" turf, is specially suitable.

In days of old, a golf course was usually kept by one greenkeeper who not infrequently acted as professional as well. Rabbits acted as the "grounds staff," keeping the turf short, crisp and free from weeds. The duties of the greenkeeper merely consisted in cutting holes and sweeping rabbit droppings from the greens. Now, alas, most of these old seaside courses have been ruined by well-intentioned but injudicious efforts of their green committees to improve on nature. The rabbits have been killed off. Alkaline fertilizers, fit only for agriculture, have been used, with the result that the sparse dwarf velvety turf has disappeared and is now replaced by plantains, daisies, clover, and luscious agricultural grasses, which need an enormous amount of mowing, weeding and upkeep.

MacKenzie and Hunter on one of their best—and one of the world's best par 3's ever built—the 16th hole at Cypress Point.

✧2✧

General Principles

Twenty years ago I published in the English paper *Golfing* a series of articles on what I considered the ideal golf course. Later on these were reprinted in my little book, *Golf Architecture*.

As the essence of golf is variety, it would not be wise to be too didactic as to what does constitute the ideal golf course, but my suggestions for it would be very much on the lines of what I wrote twenty years ago, and as I can hardly improve on that, I set it down here as it was originally written.

1. The course, where possible, should be arranged in two loops of nine holes.
2. There should be a large proportion of good two-shot holes, and at least four one-shot holes.
3. There should be little walking between the greens and tees, and the course should be arranged so that in the first instance there is always a slight walk forwards from the green to the next tee; then the holes are sufficiently elastic to be lengthened in the future if necessary.
4. The greens and fairways should be sufficiently undulating, but there should be no hill climbing.



THE SPIRIT OF ST. ANDREWS

5. Every hole should be different in character.
6. There should be a minimum of blindness for the approach shots.
7. The course should have beautiful surroundings, and all the artificial features should have so natural an appearance that a stranger is unable to distinguish them from nature itself.
8. There should be a sufficient number of heroic carries from the tee, but the course should be arranged so that the weaker player with the loss of a stroke, or portion of a stroke, shall always have an alternate route open to him.
9. There should be infinite variety in the strokes required to play the various holes—that is, interesting brassie shots, iron shots, pitch and run up shots.
10. There should be a complete absence of the annoyance and irritation caused by the necessity of searching for lost balls.
11. The course should be so interesting that even the scratch man is constantly stimulated to improve his game in attempting shots he has hitherto been unable to play.
12. The course should be so arranged that the long handicap player or even the absolute beginner should be able to enjoy his round in spite of the fact that he is piling up a big score. In other words the beginner should not be continually harassed by losing strokes from playing out of sand bunkers. The layout should be so arranged that he loses strokes because he is making wide detours to avoid hazards.
13. The course should be equally good during winter and summer, the texture of the greens and fairways should be perfect and the approaches should have the same consistency as the greens.

✧ *A Decided Advantage* ✧

In regard to the first three principles there can be little difference of opinion. It is a considerable advantage that a course should be arranged in two loops of nine holes, as on

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THE SPIRIT OF ST. ANDREWS

them, but I do not think for an instant that he believes what he is writing about, for at the same time he talks about the beauties of the natural courses. The chief object of every golf architect or greenkeeper worth his salt is to imitate the beauties of nature so closely as to make his work indistinguishable from Nature herself.

I have not the slightest hesitation in saying that beauty means a great deal on a golf course; even the man who emphatically states that he does not care a hang for beauty is subconsciously influenced by his surroundings. A beautiful hole appeals not only to the short but also to the long handicap player, and there are few first rate holes which are not at the same time, either in the grandeur of their undulations and hazards, or the character of their surroundings, things of beauty in themselves.

✧ It is not suggested that we should all play around the links after the manner of the curate playing with the deaf old Scotsman. The curate was audibly expressing his admiration of the scenery, the greens and everything in general until they finally arrived at a green surrounded by a rookery. The curate remarked "Is it not delightful to hear the rooks?" "What's that?" said the deaf old Scottie. "Is it not delightful to hear the rooks?" reiterated the curate. The Scotsman shook his head in disgust "I canna hear a word you're saying for those dommed crows," he replied. ✧

The finest courses in existence are natural ones. Such courses as St. Andrews, and the championship courses generally, are admitted to provide a fine test of golf. It is by virtue of their natural formation that they do so. The beauty of golf courses in the past has suffered from the creations of ugly and unimaginative design. Square, flat greens and geometrical bunkers have not only been an eyesore upon

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 GENERAL PRINCIPLES

the whole landscape, but have detracted from the infinite variety of play which is the heritage of the game.

My reputation in the past has been based on the fact that I have endeavored to conserve the existing natural features and, where these were lacking, to create formations in the spirit of nature herself. In other words, while always keeping uppermost the provision of a splendid test of golf, I have striven to achieve beauty.

It may at first appear unreasonable that the question of aesthetics should enter into golf course design. However, on deeper analysis it becomes clear that the great courses, and in detail all the famous holes and greens, are fascinating to the golfer by reason of their shape, their situation and the character of their modeling. When these elements obey the fundamental laws of balance, of harmony and fine proportion, they give rise to what we call beauty. This excellence of design is more felt than fully realized by the players, but nevertheless it is constantly exercising a subconscious influence upon him and in course of time he grows to admire such a course as all works of beauty must be eventually felt and admired.

✧ *Cypress Point* ✧

The most beautiful of all courses we have made is Cypress Point, and at the same time it is also the most difficult of all our courses. When we constructed Cypress Point we expected we should be snowed under by hostile criticism.

My experience of really first class holes is that, like the famous "Road Hole" at St. Andrews, they at first sight excite the most violent spirit of antagonism. It is only after the holes have been played many times that the feeling of resentment disappears and the former critics become the strongest supporters.

More than half the holes at Cypress Point were of such a nature that I knew by experience that they would at first



"The ideal two-shot hole that launched my golf architecture career. C.B. Macdonald and Bernard Darwin awarded this design first place in *Country Life* magazine, July 25, 1914."

IDEAL HOLES AND GOLF COURSES

They are lacking in strategy, as most of them have been designed by architects belonging to the penal school. It is unfortunate that in the Chicago district the best golfing ground, consisting of magnificent sand dune country, is on the south shore bordering the industrial district.

In Detroit also there is some excellent golfing ground—not sand dune country, but nevertheless consisting of bold, pleasing undulations.

✧ *In California* ✧

In California there are several outstanding courses. O. B. Keeler goes so far as to say they are so much better than those in the rest of the country that he has no basis of comparison.

California golf courses are of comparatively recent origin. I have been told that before the war there were none in Los Angeles with grass greens, whereas today there are over fifty.

I attribute the excellence of Californian courses to the influence of golf architects like Max Behr and Robert Hunter. I think also that although it has been the fashion to deride Herbert Fowler's efforts, he set a standard which other architects attempted to emulate. It is a great joy to construct golf courses in California, as the Californian sun and hoseless irrigation systems bring up the grasses so quickly that the courses have a springy carpet of turf three months after sowing and give one the impression that they are several years old.

The best of these golf courses are on the Monterey Peninsula. Four courses are already existing and two more are contemplated. We have already discussed Cypress Point. I do not expect anyone will ever have the opportunity of constructing another course like Cypress Point, as I do not suppose anywhere in the world is there such a glorious combination of rocky coast, sand dunes, pine woods and cypress trees.

The Monterey cypress is unique. It has an elbowed

 THE SPIRIT OF ST. ANDREWS

gnarled appearance and is twisted into such fantastic shapes as to be almost frightening. It is even beautiful when dead and the elbowed limbs give the impression of huge white gaunt skeletons of giant men. If one first visits Cypress Point in foggy weather, these weird white skeletons looming out of the mist are so terrifying that they are apt to create a depressing effect which is only dispelled when the sun breaks through the mist and brings to view a wonderful variety of coloring unsurpassed on any golf course. Strange to say, it appears to be impossible to grow the Monterey cypress elsewhere. I have been informed that when an attempt has been made to grow them from seed it has simply resulted in the common garden variety of tree.

✧ *Pebble Beach* ✧

When, in 1929, the Amateur Championship was played at Pebble Beach, the course was almost universally admitted to be the best one on which the Championship had been played. It is very beautiful, running along the edge of the coast its whole extent.

The best holes are probably the third, eighth, and eighteenth, the last named being as fine a finish as on any golf course, and it would be better still if the entrance to the green were slightly larger. Considering the magnificence of the terrain, however, the short holes are somewhat disappointing.

The Monterey Peninsula course is considered by many to be as good as Pebble Beach. When it was constructed and ready for seeding, however, it was recognized that it could be vastly improved, and we were called in to alter it. My partner, Robert Hunter, was allowed only thirty days to reconstruct all the greens, and was not permitted to reroute the holes because some of the adjoining lots had been sold, and, consequently, it tied our hands considerably. The ground available for the course was in some respects even better than Cypress Point, and no doubt an equally good

 THE SPIRIT OF ST. ANDREWS

course might have been constructed if we had been allowed to make it de nove.

The fourth golf course on the Monterey Peninsula is the Del Monte Course. It has always been a complete mystery to me, and is so contrary to my experience in other countries that it should enjoy such great popularity, which cannot be entirely due to its proximity to the Del Monte Hotel, there being a greater amount of play on it than all the other courses put together. The course is well wooded and is set in beautiful surroundings, but the majority of the holes are uninspiring and uninteresting, and it has not even the minimum of good greens and fairways.

In London and many other British towns there are many courses of a similar nature to Del Monte, but as newer and better courses were made, such as Sunningdale, Wentworth, and Addington, the majority of the members of the flat park courses deserted them, emigrating elsewhere, and it was not until these park courses were reconstructed that they regained any degree of popularity.

In Scotland, the first question asked on returning to the clubhouse is, "Did you have a good match?" In America, only too frequently, "Did you have a good score?"

Scoring is easy at Del Monte, so this may account for its popularity. Since writing this, there has been a marked decrease of play at Del Monte and Pebble Beach, and an increasing amount on the Monterey Peninsula and Capistrano Point. Notwithstanding the Depression, last winter Capistrano Point had nearly twice as much play as the previous year.

✧ *Lakeside, Hollywood* ✧

In Southern California there are many good golf courses. By far the best of these is Max Behr's course at Lakeside, the course on which Bobby Jones played in some of his pictures. Lakeside had none of the natural advantages of the Monterey courses, the Olympic at San Francisco or the

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IDEAL HOLES AND GOLF COURSES

many of the other courses in the Los Angeles district, but it has been so admirably designed and constructed that it compares favourably with any inland course. It was originally a flattish orchard. Now the whole ground has been made undulating and the undulations have such a natural appearance that they have a close resemblance to real links land.

The interest of the course is entirely due to the undulations and not due to bunkers, which at many of the holes are nonexistent. In a word, Lakeside is one of the world's greatest golf courses.

Norman Macbeth's course, Wilshire, has some interesting holes. The 18th is magnificent. It has not a single bunker, but owes its excellence to a large deep arroyo running diagonally almost the full length of the hole.

On the San Francisco Peninsula there is a wealth of good golfing territory. The sand dune country owned by the Olympic Club, which although not so spectacular as that on the Monterey Peninsula, is the finest golfing territory I have seen in America.

Unfortunately, the courses were designed and constructed at a time when not so much was known about golf course construction as is known today, so that owing to the lack of provision for drainage, floods washed some of the most spectacular holes down the slopes towards the sea.

✧ *Sharp Park* ✧

The municipal courses in San Francisco are far superior to most municipal courses. The newest, which we constructed at Sharp Park, was made on land reclaimed from the sea, similar to the Lido course; the greens and fairways were built with sand sucked up from below the water. One fairway alone required 200,000 cubic yards of sand to build it up above 10 feet of water. This was probably the biggest engineering feat of its kind that has ever been attempted.

 THE SPIRIT OF ST. ANDREWS

The course now has a great resemblance to real links land. Some of the holes are most spectacular. Two of them are of similar type to the plan of the ideal two-shot holes depicted on page 166. One of them has the island on the right and the other on the left. In designing and constructing the course we had the greatest assistance from Mr. John Maclaren, the designer of the Golden Gate Park. John Maclaren is an artist, and his help not only in the artistic planting of trees but in creating other delightful features was most valuable.

« *Pasatiempo* »

Miss Marion Hollins was the founder of Pasatiempo, the course at Santa Cruz. My wife and I consider the course so beautiful that we have built a cottage on the edge of the sixth fairway.

I have always wanted to live where one could practice shots in one's pyjamas before breakfast, and at Santa Cruz the climate is so delightful that one can play golf every day of the year, where it is never too hot and never too cold, and if it should rain it usually does so at night.

Many good golfers consider the second nine holes of Pasatiempo the finest in existence. The short holes are especially good, and I think the sixteenth hole is the best two-shot hole I know. I certainly do not know of any hole which gives so great an advantage for length and accuracy.

On the Northern Pacific Coast the best known courses are at Oak Bay and Colwood, Victoria. Oak Bay has an attractive setting by the sea, but if I remember rightly, has three one-shot holes in succession and other defects which prevent it being an ideal course. These defects are largely owing to outcrops of rock which limited the positions available for greens, and when the course was first constructed there was none of the new machinery available for dealing with rock as there is today.

THE SPIRIT OF ST. ANDREWS

land. He did not appear to realize that there are hundreds of times as much land devoted to wheat as to golf, and that, moreover, wheat can be grown away from the big cities, whereas golf courses for the masses are of value only when they are in close proximity to large towns.

A good golf course is a great asset to a nation.

Those who harangue against land being diverted from agriculture and used for golf have little sense of proportion. Comparing the small amount of land utilized for golf and other playing fields with the large amount devoted to agriculture, we get infinitely more value out of the former than the latter. We all eat too much.

During the Great War, in Britain, the majority were all the better for being rationed and getting a smaller amount of food, but none of us get enough fresh air, pleasurable excitement and exercise.

Health and happiness are everything in this world. Money grubbing, so-called business, except insofar as it helps to attain this, is of minor importance.

One of the reasons why I, a medical man, decided to give up medicine and take to golf architecture was my firm conviction of the extraordinary influence on health of pleasurable excitement, especially when combined with fresh air and exercise. How frequently have I, with great difficulty, persuaded patients who were never off my doorstep to take up golf, and how rarely, if ever, have I seen them in my consulting room again.

✦ I recently came across a lady I had not seen for over twenty years. She said, "I shall always be grateful to you, Dr. MacKenzie, for what you did for me." I replied that I was not aware of doing anything for her. She said, "Oh yes! You did. You persuaded my husband to play golf. Before then he said he had no time for golf, he sat all day and every day in his office, went to church on Sunday, then ate too much and was not fit to live with for the rest of the week. Since he played golf he is not only physically fit but mentally alert.

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THE SPIRIT OF ST. ANDREWS

He who knows and knows not that he knows, will fail.
Pity him.
He who knows and knows that he knows is a wise man.
Follow him.

If more people connected with the promotion and upkeep of golf courses knew that they knew not, the game would probably not cost a quarter as much as at present, and as is the case of motor cars in America, would no longer be considered a luxury but a necessity for the promotion of the health, the happiness and the prosperity of the community.

Today one can almost gauge the intelligence and prosperity of a community by the extent golf and golf courses are booming. In America there is a tremendous boom in golf; in Russia there is none.

With the exception of ignorant politicians who, with a few notable exceptions, appear to desire to tax golf courses and playing fields out of existence, most people know that golf and other games promote the health and happiness of the community, but there are few who realize the extent to which it promotes the prosperity of the world.

Some years ago I was designing a golf course on the East coast of England which was financed by an old man and one who did not play golf. I was curious to know why he, a non-golfer, should finance the club, so one day I asked him.

He said, "During the war twelve of my clerks started to play golf. They became so much more mentally alert and so much more useful to me that I concluded golf was a great asset in promoting the prosperity of the community, and I decided to promote it to the fullest extent in my power."

I hope to live to see the day when there are the crowds of municipal courses, as in Scotland, cropping up all over the world. It would help enormously in increasing the health, the virility and the prosperity of nations, and would do much to counteract discontent and Bolshevism. There can be no possible reason against, and there is every reason in favour of, municipal courses.

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ENCYCLOPEDIA OF SAN FRANCISCO






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Polk, Willis Jefferson

Architect



Willis Jefferson Polk was born in Jacksonville, Illinois on October 3, 1867, the eldest of five children. His father, Willis Webb Polk (1836-1906), was also an architect. At the age of 14 Polk became an architect's apprentice and in 1882 he won a competition for the design of a six-room schoolhouse in Hope, Arkansas, where his family then lived. In 1885 the partnership of W. W. Polk & Sons, including Daniel Polk, Willis' brother, was established in Kansas City. Between 1887 and 1889 Willis traveled extensively and acquired experience working for many architects including [Ernest Coxhead](#) and [A. Page Brown](#). Brown encouraged Willis to follow him out to San Francisco. Polk's family also then moved here and the new firm of Polk & Polk was opened in 1892 with young Willis providing the creativity, his brother Daniel doing the drafting, and his father supervising construction projects.

Polk's earliest residential design work in the City was on Russian Hill and is well documented in Richard Longstreth's *On the Edge of the World* and Bill Kostura's *Russian Hill - the Summit 1853-1906*. He remodeled the Horatio Livermore home at 1045 Vallejo in 1891, and in 1892 he designed two multi-level houses at 1013-19 Vallejo for his family and a client, waiving his fee for the eastern portion of the lot. The structure he designed for himself was recently listed for sale for \$4,000,000. Some of his other early residential commissions were in Presidio Heights at 116 Cherry (in 1891) and 3203 Pacific (an extensive remodel in 1892). A little while later, in Pacific Heights he designed 2015 Pacific (in 1894), 2622 Jackson (also in 1894, for George W. Gibbs, San Francisco Landmark #203), and 2550 Webster (in 1896, for William B. Bourn, San Francisco Landmark #38).

The Gibbs Mansion at 2622 Jackson, pictured here, is in the Italian Renaissance style and was declared at the time by the Examiner to be 'the first classical residence in San Francisco'. The round entrance portico is reminiscent of a Tuscan villa. The exterior is gray Oregon sandstone and the home features a Gladding McBean glazed tile roof. Sadly, George Gibbs died only two months after moving into it, but his widow Augusta continued to occupy it until her death in 1918. It later became the Japanese Consulate until the outbreak of World War II. It then served as headquarters for the local chapter of the Red Cross until the late 1940's when it was purchased by the San Francisco Music and Arts Institute. It was sold in 1993 to designer Agnes Bourn, who supervised the renovation of it and made it available to University High School as their 1994 Decorator Showcase house. In May 1995 it was bought by the present owner, a pre-eminent writer/movie director. Hidden behind the house to the northwest, closer to Pacific than to Jackson, is a little-known two-story structure originally built as a caretaker's residence for the main house. Now subdivided from the original parcel and separately owned, it was also designed by Polk & Polk, and is included in the Landmark case report as an unusual support structure for such a house in the area.



Polk's father retired from the firm in 1896 and Daniel Polk had already departed to play banjo in vaudeville, which left Willis Polk struggling to survive in business. He was forced to declare bankruptcy in 1897, which hurt his reputation and his ego. He worked out of the Vallejo family house until late in 1899 when he joined architect [George W. Percy](#) after Percy's partner [F. F. Hamilton](#) died.

In 1900 Polk married Christine Barreda, moving into her family's home in Pacific Heights at what is now 2141 Buchanan. In 1901 they relocated to Chicago so Polk could work for famed architect Daniel Burnham. Burnham had laid out the 1893 World's Columbian Exposition in Chicago, which sparked the American Renaissance of arts and architecture, and had already designed two important San Francisco buildings - 690 Market (in 1889) and 220 Montgomery (in 1891). While in Chicago, in 1903, Polk designed 465 California for

QUICK FACTS

Born: Jacksonville, Illinois
October 3, 1867
Designed Hallidie Building in 1917
Died: September 10, 1924

RELATED INFORMATION

> [Ernest Coxhead](#)
> [A. Page Brown](#)

OUTSIDE RESOURCES

+ [A chronological listing of 60 selected extant works created between 1890 and 1932 in the San Francisco Bay Area by Willis Polk](#)
+ [Bourn's country estate Filoli on Cañada Road in Woodside](#)
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Entry Author: [David Parry](#)

the firm. After a three-month trip to Europe, Polk returned to San Francisco in the fall of 1903, beginning a partnership with George A. Wright which lasted until 1906, being dissolved just prior to the April earthquake.

Burnham had become a leader of the nationwide City Beautiful movement and was asked in 1904 to produce a San Francisco Plan. His associate, Edward H. Bennett, led the project, with Polk assisting, and the plan was completed in 1905. The 1906 earthquake and fire killed its chances of being implemented, but Polk convinced Burnham to reopen a San Francisco office which Polk then ran for four years before they parted ways again in July 1910.

Among the many D. H. Burnham & Co. commissions after the earthquake was a remodel of the gutted shell of the Flood mansion at 1000 California into the Pacific Union Club. It was arranged by William B. Bourn, President of the Spring Valley Water Company and owner of Grass Valley's Empire Mine. Bourn was a patron of Polk's for whom Polk designed many projects, including the aforementioned 2550 Webster and also Bourn's country estate Filoli on Cañada Road in Woodside. Much later Filoli was made famous as the Carrington house in the television series *Dynasty*.

In 1914 the Livermore family commissioned Polk to further improve the 1000 block of Vallejo. Polk designed the unusual double access ramp from Jones Street and also the houses on Russian Hill Place (1, 3, 5 and 7) that provide the flanking wall on Jones, but look like simple cottages when you are standing on Russian Hill Place. Among other notable post-earthquake residences in Pacific Heights designed by Polk are 2820 Pacific (1912), 2960 Broadway (1912), 2880 Broadway (1913), 1969 California (1915), 2233 Lyon (1916), 2840 Broadway (1917), and 2255 Lyon (1920).

In addition to his residential work, Polk played a leading role in the planning of the 1915 Panama-Pacific International Exposition as the initial supervising architect, generously giving the design of the Palace of Fine Arts, which had been assigned to his office, to Bernard Maybeck after being impressed by Maybeck's initial sketches. The Palace of Fine Arts, rebuilt in 1962, is the only significant structure that survived in place after the Exposition ended.

Polk was an untiring advocate for civic improvements. A volatile personality, he could sometimes be difficult to get along with, but his talent was never in dispute. During the construction of the Hobart Building at 582 Market (1914, San Francisco Landmark #162) he mounted a protest while perched on a steel girder ten stories up after a City building inspector tried to have the work stopped. Polk had decided that lath and plaster fireproofing of the structural steel in the building was better than the concrete soffit called for by the building code of the day. Polk won his case, but not before taking on and antagonizing the City Hall hierarchy all the way up to Mayor Rolph.

Polk's Hallidie Building at 130 Sutter (1917, San Francisco Landmark #37) is recognized world-wide as one of the first glass curtain-wall structures. This retail and office building was the last one built on the block and is not only innovative, but does a wonderful job of tying a group of individual Downtown structures into a cohesive whole. It was built for the Regents of the University of California and named after Andrew Hallidie, inventor of the cable car. Fittingly, one of the office floors is home today to the local chapter of the American Institute of Architects.

After Polk died, on September 10, 1924, his stepson Austin P. Moore (Christine Barreda's son by her first husband Charles A. Moore) came in to run the business affairs of Willis Polk & Co. With the talented architects trained by Polk, including James Mitchell and Angus McSweeney, the company completed many projects including 2800 & 2808 Broadway, 2100 Washington, the 1090 Chestnut co-operative apartments (all in 1927), and the St. Francis Yacht Club (in 1928). After Mitchell left in 1929, the company name and the Polk legacy were continued well into the 1930's by McSweeney.

For his later career, the scrapbook kept by Polk, which can be viewed at the California Historical Society, contains many fascinating insights into his work and personality.

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* * * * * SAN FRANCISCO CHRONICLE DAILY SPORTING GREEN * * * * *

Links Raise Arguments on "Play as It Lies"

Chandler Egan Will Inspect Sharp Park Golf Course As City Park Board Plans Early Construction Start

Noted Player and Architect to Supervise Links Building

H. Chandler Egan, former national amateur champion and noted golf architect, will this week inspect Sharp Park where construction of San Francisco's third municipal golf course is to begin Monday, March 3. This was the announcement yesterday of Herbert Fleischhacker, president of the park commission.

Plans for the course were drawn last year by Dr. Alistair Mackenzie, British golf architect with whom Egan is associated. Mackenzie is now in Europe and Egan will carry on the work in his absence.

Those who saw the superb test of golf that Egan created for the national amateur championship at Pebble Beach last September are

**Here Is Card
For Sharp Park**

CHAMPIONSHIP length of 6590 yards will make difficult par 71 on the city's new Sharp Park golf course.

Hole	Yds.	Par	Hole	Yds.	Par
1	420	4	10	380	4
2	250	4	11	160	3
3	470	5	12	430	4
4	140	3	13	440	4
5	380	4	14	210	3
6	170	3	15	370	4
7	375	4	16	410	4
8	435	5	17	430	4
9	580	5	18	420	4
Out	3340	37	In	3250	34
Total		6590	Total		71

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confident that Sharp Park will be among America's finest municipal courses.

Egan has had a wide range of golf course construction experience. From a home-made links at his home at Medford, Or., to the national test at Pebble Beach he has shown unusual ability to suit the lay of the terrain and the purposes of each course.

As a public links, Sharp Park will not be as difficult as Pebble Beach for the average golfer. It will conform to the Egan theory, however, of giving sporty hazards to stars who seek his aid.

With Lake Salada furnishing a fine natural water hazard, it will be more tempting than either Lincoln or Harding park present many layouts.

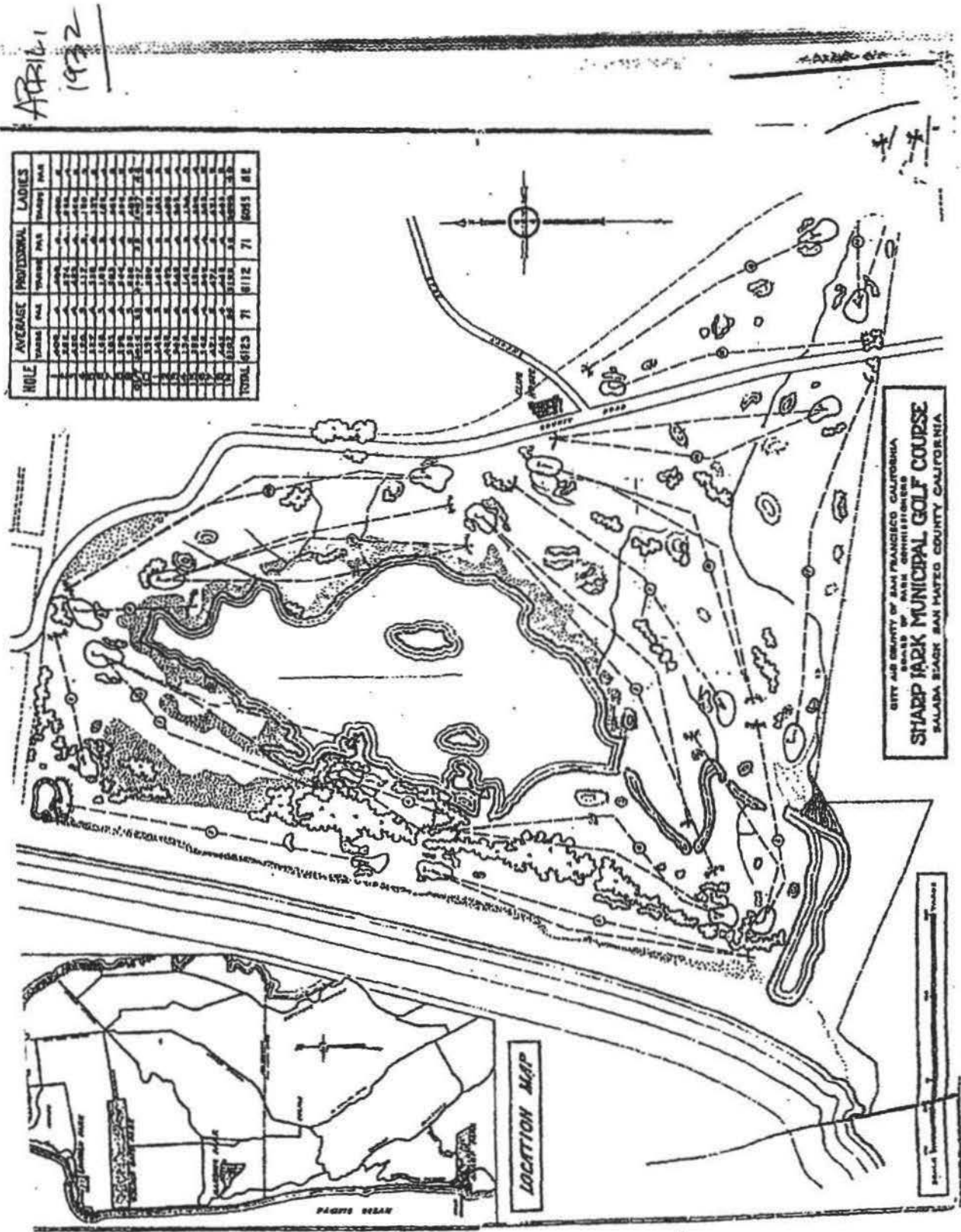
The finance committee of the Board of Supervisors last Friday appropriated \$25,000 for initial construction at Sharp Park on the Skyline boulevard, located just over the Contra Costa county line, and sixteen miles from the City Hall. The cost of the \$25,000 needed to complete the course and clubhouse is promised for appropriation next June. The course will be ready in March of next year; it is expected plans of the architects call for a course with a par of 71 and 6,600 yards long, which is full championship length. Par on the first nine is 37, yardage 3340. Par on the return nine is 34, with yardage 3350.

San Francisco Club Treasurer

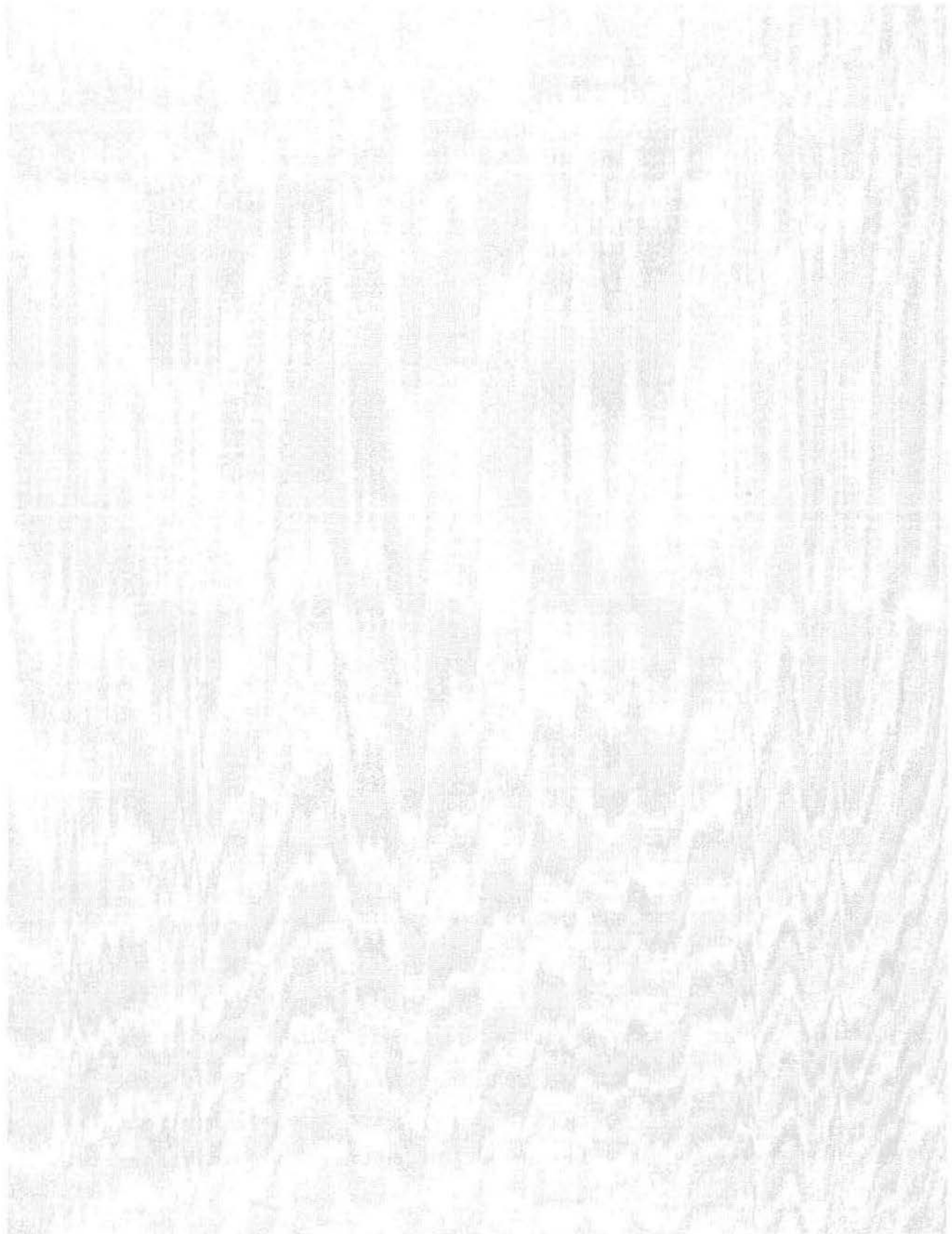
MILWAUKEE, Wis., Feb. 23 (UP)—Benny Benson, Philadelphia, a junior lightweight champion, and Eddie "Cowboy" Anderson, Chicago, fought a 10-round draw, featured by nine knockdowns here tonight. Benson's title was not at stake.

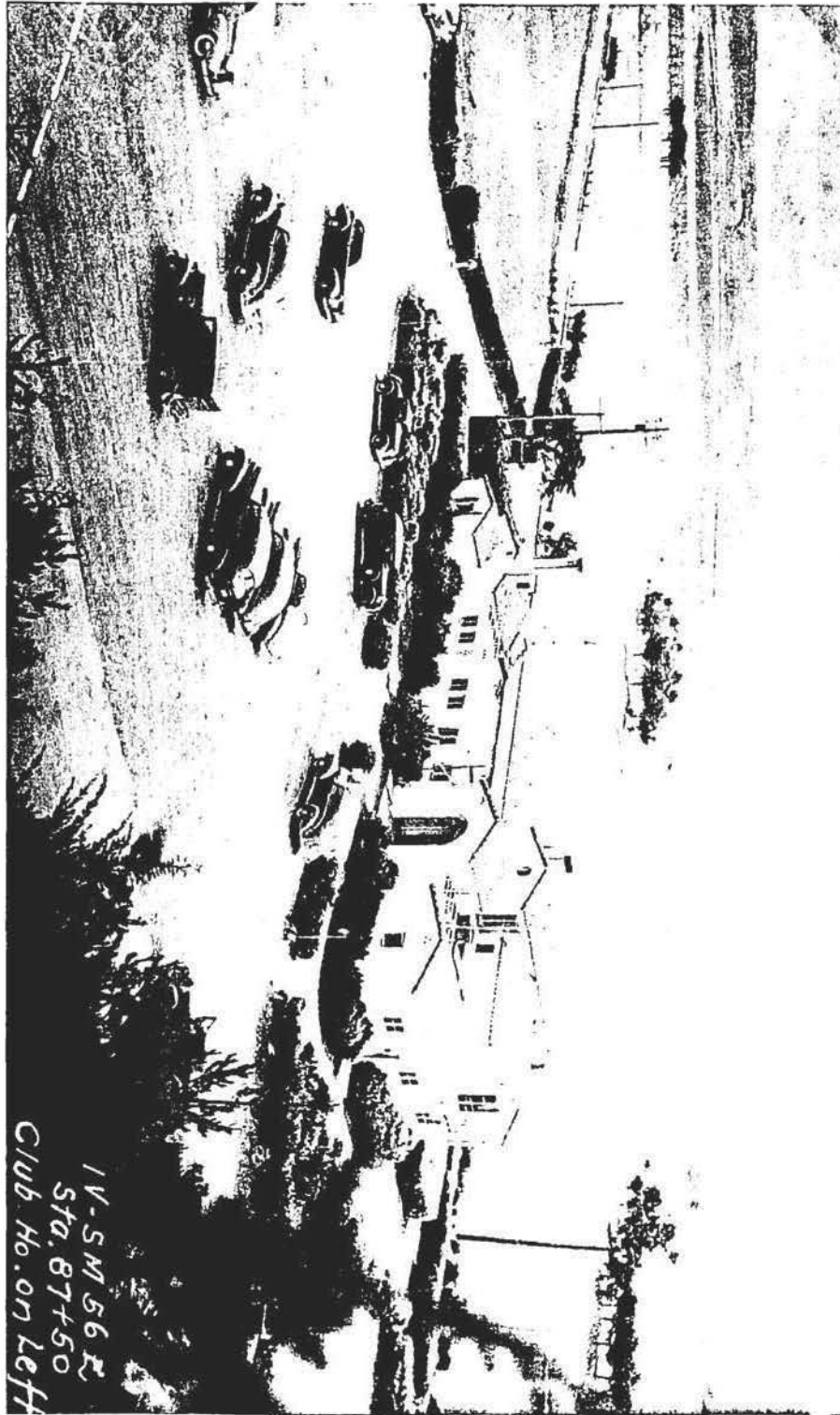
The ninth round, with both fighters endeavoring to land a knockout blow, was a plateau with thrilling action. Benson was knocked out during this action here. Anderson was knocked dizzy twice, while Anderson was on the canvas three times. Anderson had been on the floor four times in previous rounds but always managed to weather the jolts to come back strong. The decision of the referees in calling the bout a draw met with favor of the fans.

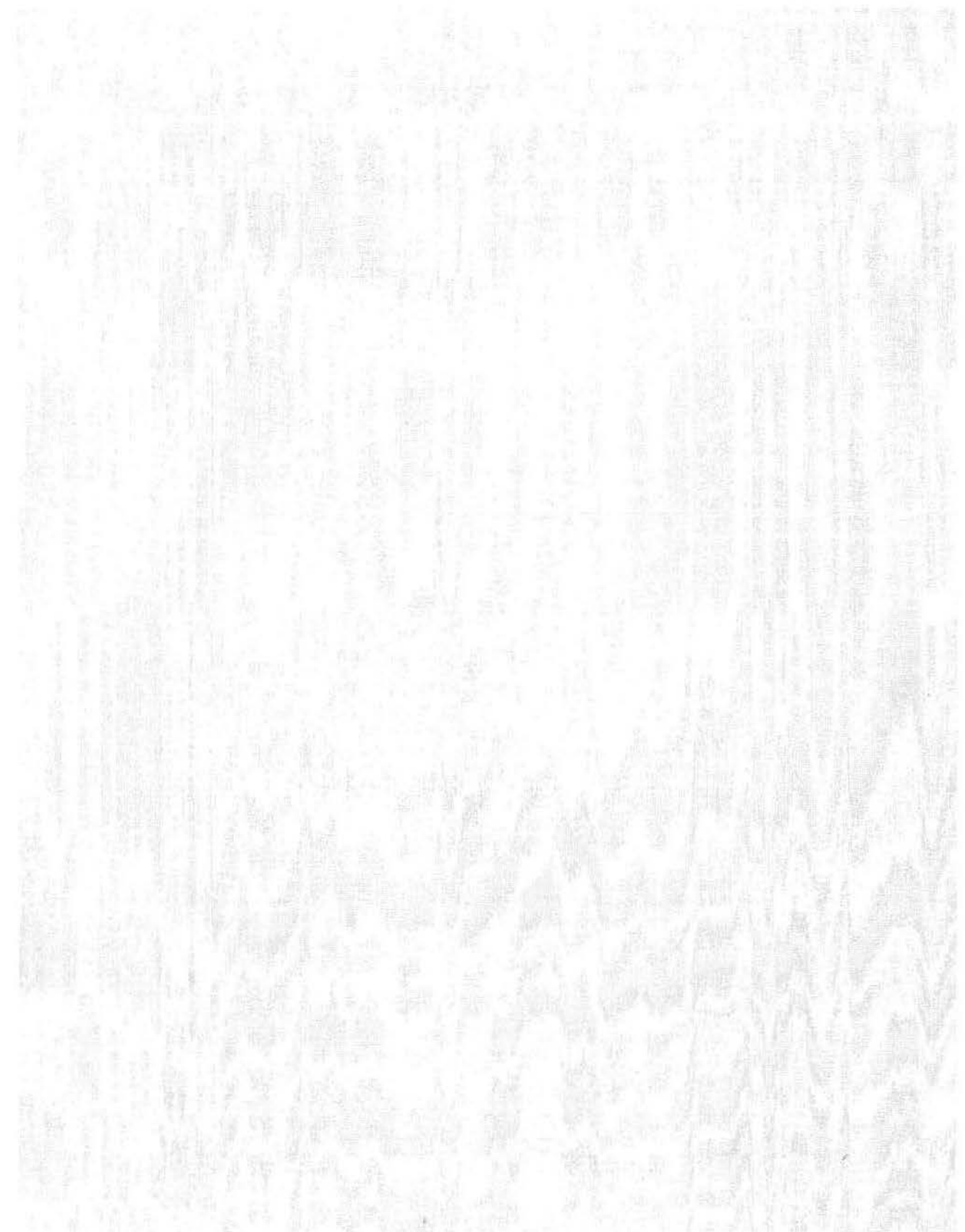
MIAMI, Feb. 23 (AP)—Lou Mad
nola of New York has been selected
to referee the fifteen-round heavy
weight elimination battle between
Jack Sharkey of Boston and Phil
Scott of England at Madison Square
Garden's second "Battle of the
Palms" February 27.
The selection was announced
after a conference between fighter
managers and promoters of the match.













San Francisco Examiner Sports

Mark of the Gullies

CC SATURDAY SAN FRANCISCO, FEBRUARY 22, 1930 SATURDAY 15

75,000 GATE PREDICTED FOR ELTERWEIGHT ATTLE TODAY

ed Listed as Predominant
Asset Favoring Champion in
Non-Title Bout at Recreation

by ALEC X. McCausland
ADES OF BENNY LEON-
ARD AND LEW TENDLER

Jackie Fields, brilliant welter-
weight champion, likened by some
to Young Leonard, master ringman
of the time, clashes with Young
Corbett, outstanding southpaw
since the advent of "Lefty"
Tendler, this afternoon at Rec-
reation Park.

The attraction, Northern Califor-
nia's most pretentious pugilistic
event of the past five years,
is expected to attract a \$70,000 gate.
Promoter Ancilli
last night estimated that
gate receipts would exceed
\$75,000.

RAIN PREDICTED.
Weather predictions for today
are not the least bit favorable.
Heavy rain has been forecast with
winds from the south. Pro-
fessor Hoffman stated last night
that nothing short of a downpour
will cause him to postpone the
fight.

"There isn't any chance of the
fight taking place in the Audi-
torium in case of a heavy rain,"
said Hoffman.

No Broadcast

Ancilli Hoffman, Monarch
Athletic Club promoter, an-
nounced yesterday there will
be no radio broadcast of the
Jackie Fields-Young Corbett
welterweight match scheduled
this afternoon at Recreation
Park.

"If the fight can't be held in
the auditorium I'll try to stage it
Saturday night. If the weather
is such that the fight can't
be held tomorrow night I will
postpone it until Monday."

As to the two fighters, they are
in perfect physical trim. More
than two weeks of arduous training
sessions have whipped the kingly
welterweights and his opponent
into the unorthodox stance into
best fighting form.

Evening odds are 2 to 1 that
Fields will emerge victorious.
There is plenty of Fields' money
to buy few Corbett backers.

The champion appears to be the
wise choice of experts and
fans. His gymnasium spar-
ing has been such as to generate
confidence and far more specula-
tion than the methodical work of
Corbett.

EASY TARGET.
Speed, we believe will be the
predominant factor in this battle.
Fields possesses the speed.
Corbett's southpaw style is ex-
pected to be bothersome in the title

Good Luck, Son!

JACKIE FIELDS, welterweight champion, and his
mother, Mrs. Finkelstein, who had a happy reunion at the
Hotel Whitcomb Thursday night. Jackie's Ma paid him
a surprise visit from Los Angeles, where he bid her good-
bye two weeks ago, not expecting to see her until after
his bout with Young Corbett at Rec Park this afternoon.



Jackie Fields' Mother,
Corbett's Father in S. F.

APPROPRIATION FOR THIRD S.F. GOLF COURSE RECEIVES OKEH

Finance Committee Approves of
\$25,000 Fund for Sharp's
Park Links; Supervisors to Act

By EARLE BROWN

SAN FRANCISCO will have a
third municipal golf course, and
it will be at Sharp's Park.

The major hurdle assuring the
constructing of a course to alleviate
the present overcrowded conditions
at Lincoln and Harding Parks was
taken yesterday when the finance
committee of the Board of Super-
visors approved an appropriation of
\$25,000 from the city treasury and
will make the necessary recommen-
dation for the amount at the next
meeting of the supervisory board.

RESOLUTION MADE.
Supervisor James E. Power made
the resolution at a meeting of the
finance committee yesterday, a
meeting attended by representatives
of the Municipal Golfers' Associa-
tion, the Junior Chamber of Com-
merce, and other civic organiza-
tions. It was seconded by Super-
visor J. Emmet Hayden and con-
curred in by Chairman Angelo
Rosen.

The sum will be taken from less
present pressing projects when
passed by the board, and construc-
tion will begin within the next 10
days, according to Captain Bernard
Lamb, secretary of the Park Com-
mission; Joseph R. Hickey, man-
aging director of recreation facili-
ties; and John McLaren, superin-
tendent of parks.

\$100,000 NECESSARY.
With over \$50,000 remaining from
the bequest of Mrs. Honora B.
Sharp, donor of the 417 acreage at
Malaga Beach, plus the \$25,000 ap-
propriated, work on the layout in
build a championship course may
be carried on until the remaining
\$100,000 necessary is included in
the June budget.

In addition to a golf course, a
recreational grounds and other pub-
lic facilities will be erected.

BUILD IT IN YEAR.
Construction of the course, ac-
cording to McLaren, should be com-
pleted within a year when started
immediately. McLaren pointed out
to the Finance Committee that un-
less the necessary appropriation
was passed, the layout could not be
ready for two years, at which time,
it was stated by others, conditions
at Lincoln and Harding Parks
would be unbearable.

Plans drawn by noted architects,
Dr. Alister Mackenzie and Robert
Hunter, have rested in the hands of
the Park Commission for the past
year. They will be used now to
create a seaside municipal course
of outstanding character akin to
those of the English and Scottish
coasts. Already 100,000 trees have
been planted on the site by Mc-
Laren, and well dug, insuring ad-
equate water supply.

Sharp's Park is located near
the city line, 12 miles from Third

BELL

On request, sent

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Responses to Comments
November 2016

CLE DAILY SPORTING GREEN

WRITTEN BY EXPERTS

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Possibilities of Sharp Park Golf Links

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COMMUTERS OF ALAMEDA OPEN PLAY SUNDAY

Pairings and Starting Times Announced for 208 Competitors

A total of 208 players will compete in the annual Alameda Commuters' golf tournament that starts next Sunday morning on the Alameda municipal course. Play gets under way as early as 8:30 a. m., when the fifth flight starts off.

Pairings and starting times:

FIRST FLIGHT—8:30 A. M.
J. J. Muesse v. Bob Birchley
H. G. Givell v. Max Williams
R. B. Wagner v. Earl Caza
Rae Croft v. D. V. Kellogg
J. H. Jordan v. A. Corlett
J. F. Jerns v. Milton Oakes
E. F. Schulte v. R. E. Wagner
R. F. Jackson v. G. W. Hoff

SECOND FLIGHT—7:30 A. M.
J. A. Jacobs v. E. L. O'Leary
H. B. Reed v. J. R. Bonner
H. G. Hart v. W. J. Emmens
George W. Daly v. Joe Kirtz
O. E. Nelson v. G. C. Morris
J. M. Howell v. John Thiedemann
O. R. Gault v. George Cray
E. C. Welch v. Harry Wilson

THIRD FLIGHT—7:30 A. M.
R. G. Wallis v. Frank Carter
Dr. F. M. Williams v. E. L. Roper
C. H. Moody v. George A. Ross
J. W. Knight v. W. E. "Bud" Fortuna
H. Forrester v. Fred Conner
P. F. Osborn v. W. C. Forrester
Charles Betscheld v. R. W. Paulsen
M. McGee v. E. R. Shepard

FOURTH FLIGHT—7:30 A. M.
J. W. Hazen v. R. J. Rose
Charles Thompson v. O. A. Grier
D. McMillan v. O. H. Deloach
R. A. Johnson v. Mike Overall
J. B. Smith v. R. P. Paul
S. J. Worth v. H. B. Choke
R. E. Orban v. Wilbert Covert
Paul Paulsen v. C. F. Glessey

FIFTH FLIGHT—6:30 A. M.
T. C. Wood v. Ed Poler
H. W. Brinkman v. W. H. Jarmon
O. D. Shepard v. J. E. O'Brien
J. C. Kirele v. B. B. Hall
A. A. Hobe Jr. v. Pete Hall
William P. Schulte v. A. J. Maccher
D. A. Morris v. H. B. Brinkman
F. H. Scott v. F. Thompson

SIXTH FLIGHT—6:30 A. M.
Peter Paulsen v. H. G. Monahan
Walter Hawk v. A. V. Merrill
R. C. Kinner v. T. W. Smith
A. Kinner v. F. P. Eby
H. B. Martine v. W. L. Canine
A. M. Smith v. W. M. Giffin
J. W. Pilling v. A. E. Kinn
J. W. Butler v. B. W. Southwell
Ray Lee v. J. E. McCall

MIRACLES OF SPORTS By Robert Edgren



HEAVY WEIGHTS FIGHT TONIGHT IN LOCAL RINK

Stewart, Rowe Tangle in Main Event Bout at National Hall

Two of the most promising of the young heavyweights to bob up in this section the past six months will headline tonight's boxing program at the National Hall arena.

Jack Stewart and Alex Rowe are the gents and they will tangle in a ten-round contest. Both are in the hands of experienced managers and trainers. Stewart being with Dolph Thomas, Rowe with Tim McOrath.

The match, in the opinion of the fight fans, will not go very far, for both can hit and are of the type that is willing to take a chance. The remainder of the bouts on Promoter Al Young's card follow:

Johnny O'Donnell vs. Benny Gallun, six rounds, bantam weights; Joe Ebbens vs. Matt Calo, six rounds, lightweights; "Red" Mullett vs. Jack Silva, four rounds, middle weights; Johnny Russell vs. Louie Gallun, four rounds, bantam weights; Don Dority vs. Andy Kelleher, four rounds, junior lightweights.

Card Mermen Will Compete in East

STANFORD UNIVERSITY, Feb. 25.—Stanford's varsity swimming team will be entered in the national intercollegiate meet, to be held at Boston, March 28 and 29, it was announced today by Alfred R. Masters, general manager of the board of athletic control.

The varsity paddlers will leave Palo Alto March 20 and have scheduled a dual meet with the Northwestern University squad, to be held in Evanston, March 26. Efforts are being made to arrange for other dual meets with college teams along the route the Stanford squad will follow. The Cards hope to be able to enter the National A. A. U. meets in Chicago April 2, 3, 4 and 5, but it is not yet definitely known whether they will be able to participate in the meet.



Western States Golf Association
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OUR LEGACY

HISTORY OF WESTERN STATES GOLF ASSOCIATION 1954-2011

Western States Golf Association was founded in 1954 with a small group of golf clubs. The charter member clubs were:

- Bay Area Golf Club, San Francisco California
- Cosmopolitan Golf Club, Los Angeles California
- Los Angeles Postal Golf Club, Los Angeles California
- Paramount Golf Club, San Diego California
- Verondale Golf Club, Los Angeles California (subsequently changed to Vamoncrest)
- Desert Mashie Golf Club, Phoenix Arizona
- Fir State Golf Club, Seattle Washington
- Leisure Hour Golf Club, Portland Oregon

Recognition of and appreciation for its founders, co-founders and prime movers of WSGA:

Vernon Gaskin of Portland Oregon was the first person to talk about the formation of such an organization. His efforts were supplemented by those of the late Bay Area Golf Club's Captain Morris Henderson of San Francisco. Mr. Gaskin served as Area Vice President of the Pacific Northwest from 1953-1973. Mr. Gaskin retired with the honor of Honorary Vice President of the Association.

Next to appear on the scene was J. Cullen Fentress of Los Angeles California. Mr. Fentress, in his first year as President of Cosmopolitan Golf Club, participated in all of the member clubs Annual Tournaments on the West Coast. It was through this participation that the idea of the formation of a central governing body evolved. Mr. Fentress became the Founding President and served as President of WSGA from 1954-1971. Upon his retirement in 1971, the honor of President Emeritus was conferred upon him. On April 8, 1989, we were diminished by our loved one's death, but we feel vastly enriched by the wealth of his legacy.

The first Association Championship was held in 1955 at Sharp Park Golf Course in San Francisco California. This event was hosted by the Bay Area Golf Club with Mr. Jim Stratten serving as the Tournament Chairman. Mr. Stratten was the immediate successor to Bay Area Golf Club's President Captain Henderson who passed suddenly. WSGA began sponsorship of the Championships in 1962 and in 1963 the Championships were sponsored for the first time.

During the period of 1971-1994, the following distinguished people served as President of WSGA. Mr. Kermit Burns of Los Angeles California served during 1971-1973 and developed procedures toward the incorporation of the Association. Mr. J. Hubert L. Earles of Los Angeles, California served during 1973-1975 and initiated the President's Ball. Mr. Fred Horton III of Oakland, California served during 1975-1977 and spearheaded the Association's "HALL OF FAME".

In June of 1977, Mrs. Pearl Carey of Seaside California became the first female elected to be President of WSGA. This historical event took place at the 23rd Annual Championships in Palm Springs California. Mrs. Carey presided over the Association very efficiently for four years (1977-1981). Her major accomplishments were to rejuvenate and revise the Association's Junior Golf and Women's Golf programs. She increased the five area Annual Scholarships to \$1,000.00 each and established an Annual WSGA Junior Golf Championship.

On June 19, 1981, the effable and articulate William "Bill" Dickey of Phoenix, Arizona was elected president of WSGA. During Mr. Dickey's term of office from 1981-1983, several major goals were achieved. Mr. Dickey ordained a Standing Committee to establish a Computerized Handicapping System to calculate and distribute handicaps for WSGA members. He promoted a strong Jr. Golf Program and obtained the 7-UP company as a sponsor of the Junior Championship and acquired Anheuser Busch, Inc. as sponsor of WSGA's Annual Championship.

Mr. Fred Parker took over the helm as president of WSGA in June 1983 and served two terms (1983-1987). Mr. Parker kept in tune with his predecessors by emphasizing and perfecting specific goals for progress and expansion. Through Mr. Parker's initiative, consistency and enthusiasm, WSGA continued to move forward

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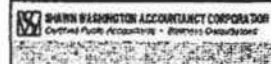
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with increased membership and expanded the Annual Championships. Mr. Parker initiated efforts to increase support for college students.

Mr. Gus Robinson, a gentleman of wisdom and integrity, was elected as the 8th President of WSGA on June 25, 1987. Mr. Robinson served for two 3-year terms (1988-1993). During this period, Mr. Robinson was very diligent and effective in performing his duties as an untiring, progressive leader. Among other accomplishments, Mr. Robinson led a constructive movement toward establishing "Tee-Cup Magazine" as the official publication of WSGA, which became a reality in 1988. He dedicated himself to eliminating the myth that there was friction between the Northern California and Southern California Areas of WSGA. Mr. Robinson was instrumental in the development of the "North/South Shoot-out" (a tournament between the women in WSGA). Although he maintained an exhilarating schedule participating in all of WSGA's sanction tournaments, he undertook the rewriting and clarification of WSGA's Constitution and By-Laws. Mr. Robinson exemplified a total commitment to the Jr. Golf Program. During his administration, Mr. Robinson became a member of the United States Golf Association and the winners of WSGA's Junior Championships were invited to the Madix/PGA Junior Championships.

In June 1993, Mr. Hank Marshall became the 9th president of WSGA. Mr. Marshall made a commitment to continue building the youth programs. During Mr. Marshall's administration, WSGA's computer equipment was updated. He organized the women's golf program so it would function like other WSGA programs. Mr. Marshall initiated efforts to complete the revision of WSGA's Constitution and By-Laws and set a five year plan for WSGA.

In June 1999, Mr. Gus Robinson became the 10th President of WSGA. It should be noted that this is Mr. Robinson's second time (recycled) as WSGA President. His incumbency during this time encompassed 1999-2003. Mr. Robinson continued his commitment to the junior golf programs and, again, performed his duties as an untiring and progressive leader.

In June 2003, Mr. George Colebrook became the 11th president of WSGA and served two terms from 2003-2009. During Mr. Colebrook's tenure as president, he stressed the importance of communication. He created and maintained a WSGA Hot-Line which enabled members to communicate directly with the President. He conducted Town Hall meetings in each of the five areas and worked closely with the Area Vice Presidents and appointed Chairpersons. Mr. Colebrook was the Editor of WSGA's newsletter during his tenure as President and along with his appointed committee, was responsible for the latest updates (2007) of WSGA's Constitution, Bylaws, and Standard Operating Procedures. Mr. Colebrook initiated the 501(c)(3) status for the Association's junior golf program (Western States Junior Golf Program). He was also responsible for WSGA receiving Hall of Fame honors from the National Negro Golf Association.

In June 2009, the second female president in WSGA's history was installed as its 12th president. Ms. Tamara Baxter's platform was based upon bringing greater visibility to WSGA's legacy, an expansion plan to increase the number of member clubs, and the utilization of technology for the purpose of Promotion, Acquisition, and Retention (PAR). One of the more successful PAR initiatives was the "Gimme 4." This initiative encouraged all member clubs to send a minimum of one (1) foursome from their respective clubs to participate in each Sanctioned tournament. This effort would ensure a greater number of participants at each tournament and increase the exposure of each hosting club. Recognizing the need to bring WSGA into the 21st Century, Ms. Baxter also implemented the redesign of the organization's website and increased the promotion of the Association utilizing various Internet platforms including social media sites Facebook and Twitter, and developing marketing collateral. Ms. Baxter's desire was to give the Association a facelift and facilitate the process of re-branding the organization.

Ms. Baxter initiated the total revision of the Association's Constitution/Bylaws & Standard Operating Procedures to update the language for relevance and clarity. Additionally, she initiated the first investment policy where the Association's assets could be invested to generate additional revenue.

During her tenure, Ms. Baxter also facilitated partnerships with World Golf Foundation (WGF) and AdvocatesUSA. WGF is the parent organization of The First Tee, the preeminent youth development program, World Golf Hall of Fame, and Golf 20/20, a research and development initiative of WGF to promote and sustain the game of golf. Mike Cooper, Ph.D, Southwest Regional Affairs Director, with The First Tee embraced WSGA's Junior Golf and Women in Golf programs. AdvocatesUSA, is a national association of African-American male professionals and entrepreneurs who promote mentoring, health and wellness, and education to inner-city male youth using golf as the medium. AdvocatesUSA founder, Ken Benbey, and their Board of Directors launched Advocates Invitational Pro Tour in 2010, a developmental tour that allows African-American males in pursuit of the PGA Tour to compete for prize money and a sponsorship into the Tour's qualifying school (Q-School). WSGA hosted the second leg of the Advocates Pro Tour in June 2010 during its Annual Championship in Denver, CO.

WSGA's Genesis for Recognition of individual performances of duties beyond expectation:

On December 10, 1978, WSGA reached a milestone when the first Hall of Fame ceremony was held at the Broadway Federal Savings and Loan Association in Los Angeles, California.

Recognizing their loyal and dedicated services the Association over the years, the following members were inducted by President Pearl Carey into WSGA's Hall of Fame:

- Mr. J. Cullen Ferriess, WSGA President Emeritus
- Mr. Vernon Gaskin, WSGA Honorary Vice President
- Captain Morris Henderson, President of Bay Area Golf Club (deceased at the time of induction)
- Mrs. Mary Woodard, (deceased at the time of induction)
- Mr. James Stratten WSGA's first General Tournament Chairman
- Mrs. Moe Crowder, WSGA Honorary Vice President

The First Tee of South Los Angeles
USGA (United States Golf Association)
World Golf Foundation

- Mr. Clifton Walker, WSGA's first General Handicap Chairman (deceased at the time of induction)
- Mr. Felbert Cobbs, WSGA's first Northern California Area Vice President

In complying with tradition as established by the Association, over 20 worthy members of long standing and meritorious service have been inducted into WSGA's Hall of Fame.

- Mr. Frank Adams Sr., June 1980, member of Cosmopolitan Golf Club (deceased)
- Mrs. Lillian Fontress, June 1983, member of Vernoncrest Golf Club (deceased)
- Mr. William "Bill" Dickey, June 1985, Desert Mashie Golf Club
- Ms. L. Diane Marbury, June 1987, member of Golden Tees Golf Club
- Mr. A. B. Mansfield, June 1987, member of Metropolitan Golf Club (deceased)
- Ms. Ella Mae Reason, June 1987, member of Vernoncrest Golf Club (deceased)
- Mr. Joseph Charbonnet Sr., June 1988, member of Tee Masters Golf Club
- Mrs. Mercedes Sanford, June 1988, member of Aberdeen Golf Club (deceased)
- Mr. Lesley A. Williams, June 1989, member of Bay Area Golf Club
- Ms. Pearl Carey, June 1991, member of Ebony Seaview Golf Club (deceased)
- Mr. Joseph Gardner, June 1991, member of Cosmopolitan Golf Club
- Mrs. Alma Jackson, June 1993, member of Golden Gaters Golf Club
- Mr. Charlie Peoples, June 1993, member of Bay Area Golf Club
- Mr. William "Bill" Butler, June 1993, member of Inland Empire Golf Club
- Mr. Sylvester Marshall, June 1993, member of Leisure Hour Golf Club (deceased)
- Mr. Carol Clark, June 1996, member Golden Tees Golf Club
- Mr. Fredrick Horton III, June 1996, member Bay Area Golf Club (deceased)
- Mr. Joe W. Boyd, June 2002, member of Cosmopolitan Golf Club
- Mrs. Argaile S. Earies June 2002, member Golden Tees Golf Club, founder Vernoncrest (deceased)
- Mr. Joseph N. Robinson, June 2002, member of Desert Trails Golf Club
- Mr. Gus Robinson, June 2011, member of Tee Masters Golf Club

Advancement in WSGA has extended to 30 golf clubs located in the states of Arizona, California, Colorado, Nevada, Oregon and Washington. WSGA is proud of the role it has played in golf since its inception in 1954.

WSGA acknowledges:

- Mr. Bill Wright of Fir State Golf Club for becoming the first African-American National Champion when he won the USGA National Public Links title.
- The financial assistance extended to Charlie Sifford prior to his joining the PGA Tour, as the Professional Golfers Association lifted its Caucasian-only clause in 1960.
- Mr. Ashley Smith (deceased) of Bay Area Golf Club, a perennial WSGA champion, also distinguished himself by winning the San Francisco, Hayward, and Oakland City Championships, and the Alameda Commuters Championships.
- Mr. Alton Duhan of Cosmopolitan Golf Club became the second African-American to win a National Championship when he won the 1982 USGA National Seniors Amateur Championship.

We also acknowledge the names Mr. Al McDaniel of Pasadena, Frank Huff of Desert Mashie, Gordon Brown of San Diego (Paramount), and Gina Daniels (Aberdeen) winners of the Pasadena, Phoenix, San Diego and Los Angeles City Title, respectively. WSGA is also proud of the following Juniors representing WSGA at the "MAXFLI/PGA" tournament: Andy Walker (Desert Mashie Golf Club), Dara Broadus (Atlanta, Georgia), Felicia Harrington and Randall Hunt (Tee Masters Golf Club - 1983), and Brandi Seymour and Randall Hunt (Tee Masters Golf Club) were 1994 representatives.

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for another North/South Shootout. The
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9/20/2011

San Francisco Call-Bulletin, March (?), 1932

TEETOPICS

By FRANK
P. NOONHere's What You'll Find at Sharps Park
Fleming Describes City's Newest Layout

With the opening of the Sharps Park course set for April 1, a lot of fairway folks want to know what the "going" is like between the net and the eighteenth green.

Playing the layout the other afternoon with Dr. Alister Mackenzie, a designer; Bob Hunter Jr., who played a prominent part in the construction of the course, and Jimmy McGee, the writer agrees with Jack Fleming, the superintendent of the course, that he has had one whole-of-a-kind trying to grow grass on the acreage circling Laguna Salada.

The soil itself is not good, and innumerable top dressings have not benefited it much. There is no fertilizer available, but with a reservoir is constructed in the center and of the course to guarantee an adequate supply of fresh water. It is intended to the belief that growing grass will remain a problem to Fleming.

Under new conditions the course is planned from a nursery near the beach, and, naturally, contains salt. The result is that the grass isn't growing as it should, and the course at present presents a "spectacular" appearance. The greens are excellent.

You want to know about the course, don't you? Well, here is a description of the layout as written by Jack Fleming. You will be interested, I know, in knowing that Fleming is rated by some other than Dr. Mackenzie as one of the most expert grasskeepers in the country.

Here is Fleming's hole by hole description of the course:

FIRST NINE

No. 1—400 yards, par 4. A fairly long two shot hole, slightly dog-legged. No particular difficulties to a straight hitter.

No. 2—320 yards, par 4. A short two shot hole. Drive must clear an arm of lake at about 100 yards, but a wide fairway available at 170 yards.

No. 3—420 yards, par 4. One of the ocean holes constructed on the beach—in a slight depression bounded by sand and grass on either side. Fairway to green slightly undulating from left on account of dune.

No. 4—350 yards, par 3. A one shot hole. Green very large, but well trapped between sand right trees on left and bay.

No. 5—320 yards, par 4. A lake-side hole and one of the most interesting holes on the course, similar to Dr. Mackenzie's "ideal golf hole." Three trees, four routes. They made probably will not at last see extra strokes to get out, while the other combinations of trees and rocks give various possibilities to their respective risks.

No. 6—180 yards, par 3. A short two shot hole. Green well trapped.

No. 7—320 yards, par 4. Similar to No. 2, but in opposite direction. A trap endangers the short player on the second, but properly played as a two shot hole a par is possible.

No. 8—320 yards, par 4. A dog-legged, quite difficult for two shots. Drive is blind and error. Trees if played close to left in opening for a good second. Plenty of fairway, however, for those who play short and do not care to risk trees on right for possible par. The wide play practically requires three strokes to get out.

No. 9—420 yards, par 4. A lake-side hole with wide, sandy beach on water side. Back tee should be used by all, as water carry is very short and close to tee. Roughly three-good shots to get on if dog-legged is played, but possibly a very long extra stroke and get in under par.

SECOND NINE

No. 10—320 yards, par 4. One of the best holes, two long, four possible routes, sand and water carry optional. The ideal shot is an accurately placed ball on an island with a water carry on both first and second shots. If well placed on first, the green opens well for a pitch and run second. All other approaches to the green are guarded.

No. 11—160 yards, par 3. A fairly wide short hole. Water and sand carry, trap green. Green, however, is long and should receive an average straight ball easily.

No. 12—480 yards, par 5. Fairway first, double dune. Not difficult except to get two good, straight drives in succession.

No. 13—460 yards, par 4. Putting the clubhouse from No. 12 green to No. 13 tee. The thirteen, fourteen, and fifteenth are all holes of a different type than the lake-side and ocean side holes. No. 13 is an upland type of hole of average difficulty. The green is well trapped.

No. 14—120 yards, par 3. This short hole has two tees. The tee with the carry across the creek opens into green easily, while, on reaching creek to the other tee, a more difficult shot over a trap at the green is encountered. Directly into prevailing wind.

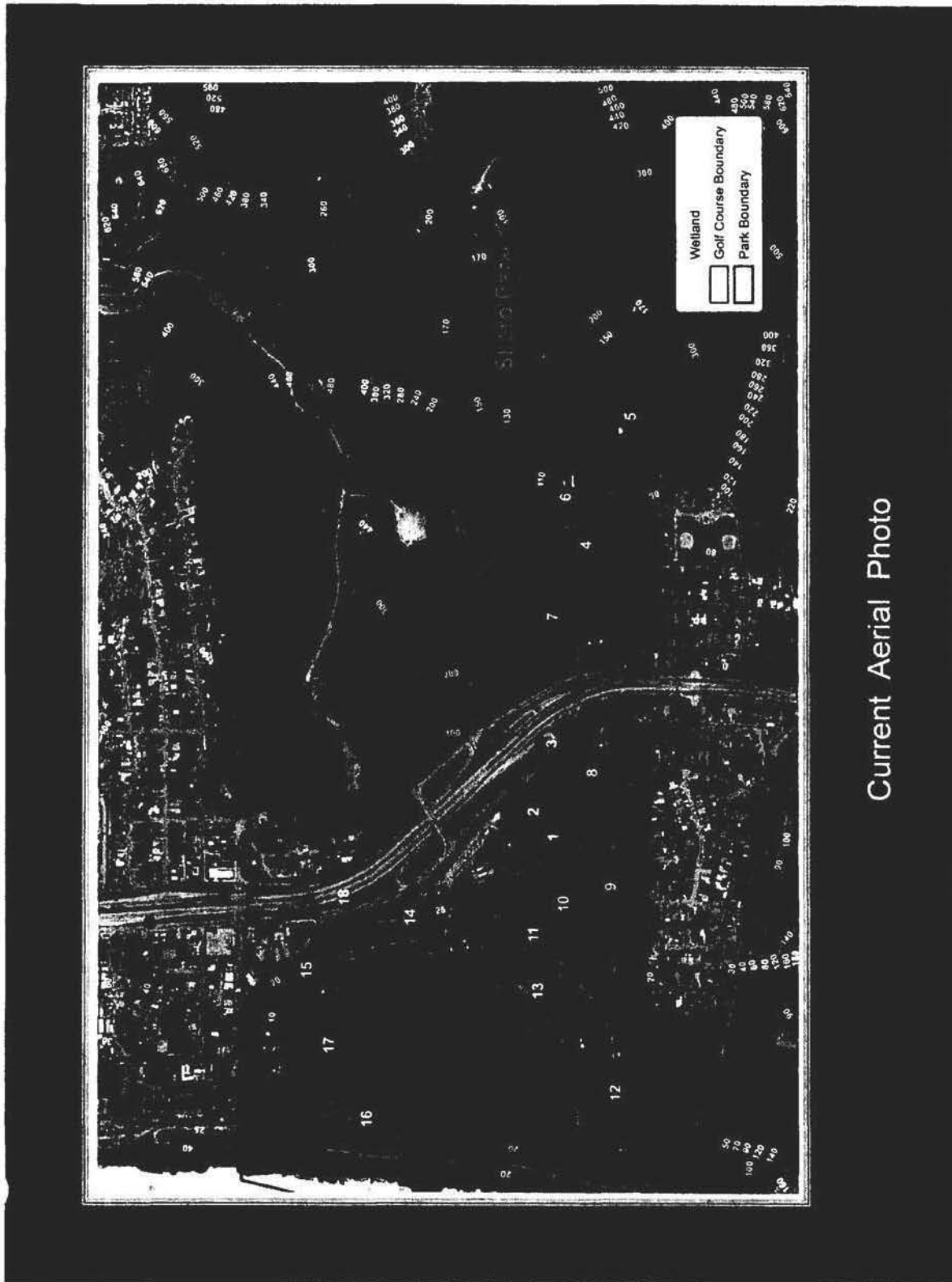
No. 15—320 yards, par 4. Similar to No. 12. At present along the edge of the country road, which is planned to be re-located. No. 15 green is now clubhouse.

No. 16—320 yards, par 4. A lake-side hole with two optional routes and a creek to cross.

No. 17—470 yards, par 5. A long hole down the south property line. The green is on a 15 foot fill.

No. 18—440 yards, par 4. The finishing hole in lake and hazard area if not successfully played on both long shots, but the green is wide, open and nicely rolling in order to lend interest to the many thrilling final decisions which will no doubt be made on it. A clamp of trees guards the green on the left.





Current Aerial Photo

Golf: Sharp Park, Courses, Alister Mackenzie, California: Golf Digest

5/31/11 12:17 PM

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Sharply Divided

What's best for Sharp Park, a dandy Pacifica, Calif., muni designed by Alister Mackenzie? Conservation advocates, pro-golf locals have very different answers



STAY THE COURSE: Links and self-described environmentalists Lancelle and Harris are working to keep Sharp Park a course (the par-3 12th, shown above).

BY GEOFF SHACKELFORD
PHOTOS BY THOMAS BROENING

July 20, 2009

Bo Links calls Alister MacKenzie's Sharp Park the golf architectural equivalent of the Golden Gate Bridge. The lawyer and San Francisco Public Golf Alliance co-founder has played the oceanside muni since 1966 and makes the analogy based on the layout's arduous two-year construction window, the combination of complex engineering issues and an architectural lineage noteworthy even in a region that relishes its ties to esteemed architects.

"If the city of San Francisco owned a studio where Leonardo da Vinci worked, they wouldn't touch it," says Links. Yet in the accelerating dispute over Sharp Park's future pitting golfers, politicians, cities, counties, Sierra Club chapters, neighbors, soccer advocates and other constituents, even long-dead master golf architect Mackenzie has been slammed for architectural "hubris."

"The original McKenzie [sic] design was fundamentally flawed to begin with, and built in an inappropriate location to boot," writes Brent Plater, a San Francisco State environmental studies lecturer who wants to see Sharp Park shut down "for the good of the game." Plater told *Golf World* by e-mail how Sharp Park "is losing money, killing two endangered species, and puts the surrounding community at risk every year when it floods."

That community is Pacifica, a 40,000-strong beachside enclave known for progressive environmentalism and a bold open-space agenda. Yet the city has had little say in the 79-year-old course's future.

That responsibility rests with San Francisco and its Board of Supervisors, overseers of Sharp Park since 1917 when the land was bequeathed to the city for "recreational purposes." Though Pacifica has been shut out of

http://www.golfdigest.com/golf-tours-news/2009-07/golf_sharp_park_shackelford_0720?printable=true

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the process, a last-minute move by pro-golf San Francisco supervisor Sean Elsbernd allows for transfer or joint management with Pacifica depending on the board's handling of a pending Park and Recreation study, which has a July 31 deadline. The report must offer solutions to restore habitat for the endangered California red-legged frog and the San Francisco garter snake.

One option is Plater's vision for a golf-free Sharp Park—an idea supported by the Center for Biological Diversity (CBD), a Tucson-based group that has litigated and won nearly 90 percent of the 500 suits over endangered species. Plater and the CBD hope to see the course converted into a biological preserve for "place based" nature education and then bequeathed to the neighboring Golden Gate National Recreation Area (GGNRA).

One glitch: The federally controlled GGNRA issued a statement that it's "not likely" to accept the golf course and would only do so as a "gift," meaning San Francisco must spend millions converting the property into a preserve before giving it away. Prior to that scenario playing out, state law gives the city of Pacifica land-use jurisdiction, meaning San Francisco must receive a Coastal Development Permit from Pacifica for any change in "land use."

Pacifica mayor Julie Lancelle is a self-described progressive, environmental advocate and golfer who appreciates the "value of the sport as an activity for people of any age."

"It's been an interesting experience being on the other side of the discussion," says Lancelle, who, along with several environmentalists interviewed, is discouraged by the "hubris" of Plater and the Center for Biological Diversity.

"There could be serious impacts to the species if a wholesale re-structuring of the land use and forms takes place as they propose," Lancelle contends. "Species have histories. They adapt themselves to their surroundings. So while human beings may think they know what's best for species, I don't think that's always the case. The species have done well at this location under the current use, which limits human impact."

The CBD counters that while frogs and snakes are found at Sharp Park, their numbers are only a fraction of "historic [pre-golf course] levels."

A key target of Plater and the Center has been the architect of some of the world's greatest golf courses.



Sierra Club member Ferreira says opponents of preserving the course have exaggerated Sharp Park's financial state.

Fresh off Cypress Point and in the process of building Augusta National, Mackenzie was a Bay Area resident when hired to design Sharp Park by transplanted Scot John McLaren, San Francisco's answer to Central Park visionary Frederick Law Olmsted. McLaren devoted his storied life to public-park creation in the otherwise cramped city. His legacy of political savvy and landscape ingenuity produced the 1,017-acre Golden Gate Park,

annually the most visited in the United States with 13 million visitors. McLaren planted more than two million trees during his reign, including at least 100,000 in and around Sharp Park where, according to Mackenzie, "we had the greatest assistance" from McLaren who helped "not only in the artistic planting of trees but in creating other delightful features."

As Sharp Park's project supervisor, McLaren worked with golf's most legendary course architect and the firm's legendary associates. Robert Hunter, author of *The Links* and co-designer of Cypress Point, came out of retirement to assist, while H. Chandler Egan, the former U.S. Amateur champion and Olympic golf gold medalist-turned-architect visited regularly just two years after his transformation of Pebble Beach. Even shaper-turned-architect Jack Fleming would become the first Sharp Park superintendent and eventual creator of four beautiful forest holes after damaged seaside holes were abandoned.



McLaren's trees and Laguna Salada are part of the course's look.

"Mackenzie did things at Sharp he didn't do anywhere else," says Links, who has won the last two Golf World Lido Design contests, named after the famed *Country Life* magazine contest that launched Mackenzie's career in 1914.

The original Sharp Park layout included two stunning multi-option fairway holes incorporating the now-controversial Laguna Salada, which has shrunk due to silt build-up. The fascinating par-4 fifth (current 17th) teed off from an island tee while the two-shot 10th (current 14th) paid homage to the original contest-winning Lido hole. More than \$400,000 was spent to fill areas around the Laguna with beach sand and top soil, including, by Mackenzie's estimate, \$200,000 for one hole.

While Sharp did suffer highly publicized early flooding and turf issues due to salty irrigation water, Plater's assertion that a coastal storm destroyed "all seven oceanfront holes six years after the course opened" is in question. Several aerial photographs from 1941 show all 18 still in play along with the trademark Mackenzie details that defined masterworks such as Cypress Point, Augusta National and Pasatiempo: quirky green shapes, approximately 50 carefully sculpted bunkers giving the impression of erosion and the trademark use of camouflage-inspired mounding. Six holes brought the Laguna into play.

Sharp Park fell into the same resource-deprived disrepair that plagued many Golden Age courses during World War II. It was tweaked by Robert Muir Graves in 1972 and suffered more damage in a 1982 flood, which led to a seawall that kept brackish water out while guaranteeing the fresh water required for garter snakes and red-legged frogs to survive.

Newspaper reports compared the April 16, 1932, opening-day yardage of 6,123 yards to the Old Course's 6,189 tally. Egan even pronounced Sharp Park a "worthy imitation of the classic course" at St. Andrews. Perhaps only H.S. Colt's Timber Point or C.B. Macdonald's Lido designs trumped Sharp Park for sheer creativity and audacity. Certainly no municipal-course design has ever come close to matching the overall package of beauty and affordable links-style golf. (The initial \$1 weekend green fee works out to about \$15 in modern dollars. Residents currently pay \$26 on weekends.)

Sharp Park achieved Mackenzie's dream of using cheap municipal golf to "help enormously in increasing the health, the virility and the prosperity of nations." While today's design features 12 of the original green complexes in deteriorated form, Mackenzie would surely embrace Sharp Park's continued affordability,

accessibility and friendly atmosphere.

Even the look produced by an outdated irrigation system and minimal maintenance resources—a six-man union crew mowing greens daily and fairways once a week—might delight Mackenzie, who wrote in *The Spirit of St. Andrews* that there was “great charm in the varying shades of color on a golf course” and a layout consisting “of one shade of green would be merely ugly.”

Much of Sharp’s multicolored look stems from its move to organic practices, dating to 1998 as part of a city-mandated program to wean parks from pesticides. As of June 1 this year, the course moved to an entirely organic program, believed to make it one of only a handful of such courses in the world.

Since 2005 the Laguna and rain-drenched fairways have not been pumped to protect the red-legged frog’s annual egg-laying. As for the garter snake, Jeff Miller of the Center for Biological Diversity’s San Francisco’s office says the colorful serpent has been negatively impacted by a combination of mowing accidents and herbicide applications. According to U.S. Fish and Wildlife, there has been one documented case of a mower killing a garter snake; Miller cites a consultant’s report which concluded mowing is an ongoing threat.

Miller and the Center suggest the use of herbicides with the active ingredient Dicamba continue to constitute the “activities” killing the species, prompting the center’s September 2008 press release (which also cited pumping and mowing practices) threatening a lawsuit against the city of San Francisco. But Parks and Recreation golf division manager Sean Sweeney notes the city last used a newer weed-control formula July 9, 2008, and it contained just 00.70 percent Dicamba. Subsequently, natural products have been used. Miller says it was “news” to him that Sharp Park had gone organic.

Former Sharp Park superintendent Dan Briesach, who still plays the course once a week and sits on Pacifica’s Open Space Committee, is not surprised. “They’re making a lot of assumptions,” Briesach says of the Center. “I understand the need for habitat restoration; I don’t understand the need to be belligerent about it.”

Club president and retired school principal Dave Diller says Sharp Park golfers cover the spectrum of age, race and ability, enjoying the stunning surroundings, mature Monterey Cypress and sea breezes. That prompts his outrage at the “injustice” of the battle against his home course, where he has watched in frustration as neglect of the course’s main water feature has heightened drainage problems.



Oceanside Sharp Park is in Pacifica, Calif., but is under the jurisdiction of San Francisco’s board of supervisors.

The course still logs between 50,000 and 60,000 rounds a year. Thanks to month-to-month operator Mark Duane’s efforts, it takes in an impressive \$1 million in food and beverage gross revenue at the charming Angus McSweeney-designed clubhouse. (McSweeney was a disciple of Bay Area master architect, Willis Polk.)

Opponents of Sharp Park’s existence as a golf course insist it is a huge financial drain on the city, but according to a Dec. 17, 2008, report from city controller Ben Rosenfeld, the course has been profitable twice since 2004 when course-by-course income and expenses began to be detailed. Sharp Park is annually charged with “overhead” figures that include “inter-departmental transfers” and “general fund support.” Such mysterious figures prompted former supervisor Jake McGoldrick to say, “We have an accounting problem here; we don’t necessarily have a golfer problem.”

Golf: Sharp Park, Courses, Alister Mackenzie, California: Golf Digest

5/31/11 12:17 PM

Loma Prieta Sierra Club member Mike Ferreira says Sharp Park provides a "hell of an opportunity" to show that golf and endangered species can co-exist and contends the economic argument is unfair in light of the city's massive deficits and the course's relatively minor losses. "Some of the folks are trying to use the financial side of this to leverage their other agenda," Ferreira says. "I find that hugely irritating. It's amazing how many alleged 'enviros' are suddenly sounding like Howard Jarvis."

Recently retired San Francisco Neighborhood Parks Council head Isabel Wade has also been lobbying for Sharp Park's closure, telling radio station KQED that golf is "predominantly a white sport" and not "a family-oriented sport that you do with other folks." She has been lobbying to use Sharp Park to make up for the city's shortage of soccer fields, skate parks and hiking trails, even though the property is outside of San Francisco city limits. Miller confirms that city-adoption of the Parks Council solutions—if they involve environmentally sensitive areas—could invite the same legal threats. Wade did not return repeated calls for comment from Golf World.

Ultimately the debate transcends soccer fields, critters and city limits. Despite Sharp Park's egalitarian atmosphere, the course appears to be a victim of a long-festering disdain for what golf represents.

As co-founder of the San Francisco Public Golf Alliance, attorney Richard Harris has slowly allied golfers into a united front after early friction. In 2000 he thwarted his alma mater Stanford University's plan to convert holes at its course into faculty housing. A self-described "enviro" who got his start in politics fighting an Army Corps of Engineer dam project on California's Mad River, Harris finds himself defending the sport he loves.

"Golf has historically been attacked by people who have seen golfers as subversive of socially useful activities, such as church-going and military service," Harris says. "We face the same kind of opposition today. Something like religious intolerance is at work in the most zealous opposition to golf. Dedicated golfers—like dedicated surfers, or rock-climbers or fly-fishermen—are nature worshipers. And our most zealous opponents are those who think they have the one true religion."

Keywords: GOLF WORLD, GOLF, COURSES, SHARP PARK, ALISTER MACKENZIE

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9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 SAN FRANCISCO DIVISION
 12

13 WILD EQUITY INSTITUTE, a non-profit
 corporation, CENTER FOR BIOLOGICAL
 14 DIVERSITY, a non-profit corporation,
 NATIONAL PARKS CONSERVATION
 15 ASSOCIATION, a non-profit corporation,
 SURFRIDER FOUNDATION, a non-profit
 16 corporation, SEQUOIA AUDUBON, a non-profit
 corporation, and SIERRA CLUB, a non-profit
 17 corporation,

18 Plaintiffs,

19 v.

20 CITY AND COUNTY OF SAN FRANCISCO,
 ED LEE, Mayor of the City and County of San
 21 Francisco, PHIL GINSBURG, Director, City and
 County of San Francisco Recreation and Park
 22 Department,

23 Defendants.
 24
 25
 26
 27
 28

Case No. 3:11-cv-00958 SI

**DECLARATION OF ROBERT
 TRENT JONES, JR. IN SUPPORT
 OF MOTION TO INTERVENE BY
 SAN FRANCISCO PUBLIC GOLF
 ALLIANCE ("SFPGA")**

Date: June 24, 2011
 Time: 9:00 a.m.
 Courtroom: 10, 19th Floor
 Judge: Hon. Susan Illston

DECLARATION OF ROBERT TRENT JONES, JR. IN SUPPORT OF MOTION TO INTERVENE BY
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 sf-2990441

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1 I, Robert Trent Jones, Jr., declare as follows:

2 1. I am a golf course architect. I have personal knowledge of all facts stated in this
3 declaration, and if called as a witness I could and would testify competently to them.

4 2. I have been designing golf courses for over four decades. I have designed over
5 270 golf courses in 40 countries on six different continents. I also am a lifetime member and
6 former President of the American Society of Golf Course Architects.

7 3. I am a former member and Chairman of the California Park & Recreation
8 Commission. I am currently and have been for the past six years, Emeritus Director of Refugees
9 International. I serve on the Town of Woodside Open Space Committee. I am also a member of
10 the California Golf Hall of Fame.

11 4. I have been called the father of environmental golf course design, as I "listen to the
12 land" when designing a course and ensure my design fits with the natural landscape. My work
13 and philosophy regarding golf course design has led to several of my courses being recognized by
14 Audubon International, the highest ecological and environmental protection standard in golf.

15 5. My golf course designs have received numerous recognitions and accolades and
16 they have consistently ranked among the best layouts throughout the world. A few of these
17 recognitions and awards are:

18 a. *Golf Digest* ranked the Prince Course in Kauai, Hawaii, designed by my firm, in
19 the Top 10 of America's Greatest Public Courses and has been rated Hawaii's No.
20 1 golf course.

21 b. I was recently voted #1 Golf Architect in Asia for the third year in a row by the
22 readers of *Asia Golf Monthly*.

23 c. The Osprey Meadows course in Idaho designed by my firm was awarded *Golf*
24 *Digest's* Best New Public Course for greens fees \$75 and over.

25 d. Chambers Bay in Pierce County, Washington, one of the more recent courses, has
26 been awarded:

27 Best New Course for 2007 by *Travel & Leisure Golf* capturing the course
28 as "A Brand New Bay" (emphasis added).

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Number 2 spot in *Golfweek's* Best New Courses Awarded Signature Status by Audubon International for reclamation of an abandoned rock quarry that became a trail system, a 20-acre park, an amphitheater and a water treatment facility on the property that will allow the course to use gray water exclusively.

- e. In 2010, Celtic Manor's Wentwood Hills Championship Course (designed by my firm) hosted the Ryder Cup (the first time that Wales has ever hosted this event).
- f. Crystal Springs Golf Course in Burlingame, CA was awarded *Golf Digest's* Environmental Leader Award.
- g. Rancho San Marcos Golf Course, Santa Barbara, CA was rated among the Top 10 Public Golf Courses by *Golf Magazine*.
- h. Woodlands Golf Course at Sunriver Resort, OR was rated "One of the 100 Best Women-Friendly Courses" by *Golf For Women*.
- i. Spring City Golf & Lake Resort, Yunnan Province, China was rated #1 of Top 10 Courses in China by *Golf Digest China*.
- j. Harbour Plaza Golf Club, Dongguan City, Guangdong, China was ranked in the Top 10 Golf Courses in China by *Golf Digest China*.
- k. Professional and amateur golf championships for men and women have been played on over 100 of my courses.

6. As part of my dedication to excellence and aiding golfers to achieve their best, I authored the nationally distributed book *Golf by Design* published by Little, Brown & Company. The book instructs golfers how to lower their score by reading the features of a golf course.

7. A complete profile of my work can be found at my company Robert Trent Jones II, LLC's website, www.rti2.com.

8. I am quite familiar with the work of Dr. Alister MacKenzie and with the course he created at Sharp Park in Pacifica, California. I will explain Dr. MacKenzie's design philosophy and the work he did at Sharp Park in the following paragraphs. The main point, however, is that Sharp Park is a very historic golf course that is worth preserving for the next generation. By any

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1 standard, Sharp Park is an incredible design achievement, for out of a brackish salt marsh, Dr.
 2 MacKenzie (with the help of the legendary John McLaren, who Dr. MacKenzie acknowledged in
 3 his book *The Spirit of St. Andrews*) he created a spectacular course that mimics the features of
 4 traditional Scottish links land.

5 9. Dr. Alister MacKenzie lived between 1879 and 1934 and was trained as a
 6 physician. He served in the Boer War and became fascinated with camouflage and when he later
 7 turned to golf course architecture, he incorporated many camouflage concepts into his design
 8 work. One of the reasons Dr. MacKenzie made the transition from doctor to golf course architect
 9 was because he could see firsthand the health effects the game of golf had on his patients. He
 10 also knew that good golf course design was something that could engage the player and
 11 invigorate the human spirit—thus, he sought to create courses that had a true spirit of adventure
 12 built into them, designed to make golfers feel as if they were playing a course that looked fiercer
 13 than it really was, all for the benefit of making a player's blood rush.

14 10. Dr. MacKenzie was a most complete golf architect of his time. His courses can be
 15 found all over the world and include many courses considered by the most knowledgeable
 16 authorities to be among the finest ever constructed, including Augusta National Golf Club (site of
 17 the annual Masters Tournament) and the Cypress Point Club at Pebble Beach (one of the most
 18 scenic and delightful courses ever conceived). Dr. MacKenzie's courses are in Australia, New
 19 Zealand, England, Scotland, Ireland, Canada, South America, and many are here in the United
 20 States. He was so highly thought of that he was named the Consulting Architect at St. Andrews,
 21 the home of golf.

22 11. Dr. MacKenzie laid out his design principles in a book titled "Golf Architecture,"
 23 first published in 1920. It is one of the first books ever written about the subject. He also wrote a
 24 manuscript titled, "The Spirit of St. Andrews," which had lain dormant for many years, but was
 25 finally published in 1995 over 60 years after Dr. MacKenzie passed away. Dr. MacKenzie's
 26 design philosophy is captured in these two books, and can be summarized by several key
 27 principles:

28 ///

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- 1 (a) The course, where possible, should be arranged in two loops of nine holes;
- 2 (b) There should be a large proportion of two shot holes (par 4's), two or three
- 3 drive and pitch holes, and at least four one-shot holes (par 3's);
- 4 (c) There should be little walking between the greens and tees and the holes
- 5 should be sufficiently "elastic" so they can be lengthened in the future if
- 6 necessary;
- 7 (d) The greens and fairways should be sufficiently undulating, but there should be
- 8 no hill climbing;
- 9 (e) Every hole should have a different character;
- 10 (f) There should be a minimum of blindness for the approach shots;
- 11 (g) The course should have beautiful surroundings and all artificial features should
- 12 have so natural an appearance that a stranger is unable to distinguish them
- 13 from nature itself;
- 14 (h) There should be a sufficient number of "heroic carries" from the tee, but the
- 15 course should be arranged so that the weaker player with the loss of a stroke or
- 16 portion of a stroke shall always have an alternate route open to play;
- 17 (i) There should be infinite variety in the strokes required to play the various
- 18 holes;
- 19 (j) There should be complete absence of the annoyance and irritation caused by
- 20 the necessity of searching for lost balls; and
- 21 (k) The course should be so interesting that even a beginner or weak player is
- 22 constantly stimulated to improve in an attempt to get better at scoring, and
- 23 such players should be able to enjoy the course in spite of piling up a big score.

24 12. Among these principles, perhaps the best known is that Dr. MacKenzie tended to
 25 build holes where there was more than one route from tee to green. He created holes like these so
 26 different players, of varying abilities, could play the same hole in different ways and always enjoy
 27 the journey and give each other a spirited game in the process. In many cases, a "MacKenzie
 28 hole" offers an advantage to a player who was willing to take an increased risk (such as carrying

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1 over a hazard) and who successfully pulled off the gamble. In addition, he believed in rolling
 2 putting greens, so players of every age would find endless challenges when they got close to the
 3 flagstick. He also favored wide fairways, so even beginners could enjoy the game despite hitting
 4 an occasional wild shot. In MacKenzie's view, the "penalty" for wildness was not a lost ball, but
 5 rather, a strategic disadvantage when playing the next shot. He rewarded players who had
 6 control, but especially rewarded players who plan their line of attack. On a MacKenzie course, it
 7 is the intelligent player who enjoyed the most success; brute strength may prove helpful on
 8 occasion, but on a course designed by Dr. MacKenzie, it is never a total solution.

9 13. But control, too, is not everything. MacKenzie also knew that undulation and odd
 10 bounces must be a part of the game, for they provide not only charm but mystery to a round of
 11 golf. Indeed, on a great course, the same shot will not play the same way twice in a row—it will
 12 bounce differently, for one thing, and it will also be susceptible to weather, particularly wind.

13 14. An unfortunate aspect of Dr. MacKenzie's work is that most of it was for private
 14 parties. Thus, most of his courses are privately owned and not readily accessible to the public.
 15 That is the key aspect of Sharp Park that makes it a rare gem—it is a "public course designed by a
 16 master architect." In addition, it is the only MacKenzie public course that is located next to the
 17 ocean, a circumstance that in many respects takes golf back to its roots, for the game was born on
 18 links land—land located near an open sea or bay that happens also to be connected directly to the
 19 sea through natural drainage patterns. Traditional links land is low lying land which has been
 20 formed by centuries of drainage, tidal changes and the brisk weather along the sea. It generally
 21 possesses the characteristics of naturally rolling sand dunes and natural features which have been
 22 formed by the wind, the ocean, and the action of receding tides in ancient times.

23 15. The golf course Dr. MacKenzie laid out at Sharp Park illustrates many of his noted
 24 design concepts. His original layout, depicted in the hereto attached Exhibit A, includes holes
 25 where there are multiple tees, multiple fairways, cross bunkering (sand bunkers crossing the
 26 fairway, not merely running alongside the fairway), water carries, creatively shaped greens and,
 27 in short, shots for every level of player. And Dr. MacKenzie used his famous camouflage
 28 techniques at Sharp Park; prime examples of this are in the approaches to the first hole (which

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1 was the original 16th hole); the third hole (original 13th) and the 14th (original 10th) – in each
 2 case, the green is further away than it looks, and this is due to the contours and bunkering that Dr.
 3 MacKenzie designed into these holes.

4 16. I have walked the course at Sharp Park many times and to my eye the features Dr.
 5 MacKenzie conceived 80 years ago are still there, and the ones that time has worn down are also
 6 there, waiting patiently for loving hands to restore them. Indeed, the restoration and renovation
 7 of storied golf courses with proper consideration for the environment is a significant part of the
 8 work I do. Every course in the world needs restoration work as the years roll by, especially
 9 courses near the sea that are subject to wind and erosion. In fact, the bunkers at St. Andrews are
 10 rebuilt every few years; and virtually every great venue in the world, including the sites of the
 11 great championships of the game, are regularly restored and preserved for a new generation of
 12 golfers. The course is so beautiful it is hard to conceive of it as a barren sand dune; and indeed,
 13 that to me is the genius of Dr. MacKenzie: that he could transform the land into such a wonderful
 14 golf course that has been so well loved over the last 80 years. It is really reminiscent of the links
 15 at North Berwick, or St. Andrews itself, which sits in the middle of a Scottish town. One gets the
 16 same feeling walking and playing Sharp Park.

17 17. Restoration work is especially important for public golf courses, as the vast
 18 majority of the game is played on public facilities. There are countless examples of this
 19 restoration work, but one of the most poignant is the work that was done to discover and restore a
 20 “lost” course created originally by Old Torn Morris. The course is Askernish, located on South
 21 Uist (pronounced “yew-ist”) in the Outer Hebrides off the coast of Scotland. That work was
 22 chronicled in an article titled “The Ghost Course,” by David Owen, which appeared in the April
 23 20, 2009 edition of *The New Yorker* magazine, and a copy of which is attached hereto as Exhibit
 24 B. This is precisely the type of work called for at Sharp Park—work on a low budget so the
 25 course can be restored in a minimalist fashion, preserving the features Dr. MacKenzie created, but
 26 at the same time making certain that this magnificent gem of a golf course will be there for many
 27 generations of golfers, just as Dr. MacKenzie dreamed it would be.

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1 18. There is no question that Sharp Park is an historic property well worth preserving.
 2 I can tell the Court, first hand, that often when I gather with colleagues at the American Society
 3 of Golf Course Architects (of which I am a past President), I get a question or two about "that
 4 MacKenzie course at Sharp Park" and what is being done to save it.

5 19. It should also be noted that there are any number of competent strategies for the
 6 environmental issues at Sharp Park. I have given the course a considerable amount of study, as
 7 have my colleagues at Robert Trent Jones II, namely accomplished golf course architects Bruce
 8 Charlton and Jay Blasi. We have no doubt that Dr. MacKenzie's historically significant original
 9 design—or at least major portions of it—can be saved while at the same time expanding the
 10 amount of available habitat for the California red-legged frog and the San Francisco garter snake.

11 20. I make this declaration based on information personally known to me, except as to
 12 those matters based on information received, and as to those matters, I believe them to be true.

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1 I declare under penalty of perjury that the foregoing is true and correct and that this
2 declaration was executed at Palo Alto on May 12 2011.
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7 Robert Trent Jones, Jr.
8 Robert Trent Jones, Jr.
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DANIEL WEXLER

1100 EAST IMPERIAL AVE. SUITE B
EL SEGUNDO, CALIFORNIA 90245
TEL: 310 322-5534
E-MAIL: MIDD23@AOL.COM

July 19, 2009

To Whom It May Concern:

I am writing this letter as the author of *The Missing Links: America's Greatest Lost Golf Courses & Holes* (Sleeping Bear Press, 2000), a volume which, I understand, is being invoked in the current public debate over the future of Sharp Park by persons who advocate closing the golf course.

Missing Links was designed to profile great pre-World War II American courses which either no longer exist, or have been substantially altered from their original configurations. That Dr. Alister MacKenzie's original Sharp Park design was included in such a volume was not meant to imply that the course is entirely gone; indeed, many profiled facilities retain significant portions of their initial layouts, including the first course in its sister volume *Lost Links*, Augusta National. However, it appears that some confusion has arisen from a closing section of the Sharp Park text, which reads: "...and no appreciable trace of [MacKenzie's] strategy remains in play" – so let me take a moment to clarify two important points.

First, in retrospect, this choice of words was not ideal, as the word "strategy" was intended to refer to tee-to-green strategy, which is today somewhat changed, particularly with a handful of lagoon- and seaside holes no longer being in play. It was absolutely *not* intended to refer to the corridors of play or the green complexes, a great number of which remain very much in their vintage MacKenzie forms. And this is a highly noteworthy point as original greens on a municipal course this old are a relative rarity – and MacKenzie's green complexes were perhaps the single most significant aspect of his renowned design style.

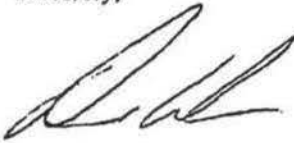
Second, more than a decade has passed since *Missing Links* was researched, and much new information on Sharp Park has since come to light. In re-assessing the golf course today, we know, for example, that most changes have been made by man, quite deliberately, and not by some massive early storm, as was the accepted wisdom back in 1999. We also know that as many as 12 holes remain substantially in their original forms – and nearly all of these could be made virtually original with a relatively modest degree of restoration.

I relate all of this because in using *Missing Links* to bolster any assertion that Sharp Park should be closed, those pushing such an agenda are, unfortunately, mischaracterizing the purpose and spirit of my words. Indeed, as one of only two municipal golf courses ever built by MacKenzie in the United States, Sharp Park is an historic facility which virtually any city would be thrilled to boast of, offering enough vintage playing characteristics to provided all classes of golfer with a real taste of a Hall-of-Fame designer's work. Further, with a bit of restoration and marketing, it is the sort of classically important

facility which can easily become a drawing card for the City of San Francisco, resulting in economic benefits well in excess of simple greens fee revenue.

It is difficult for me to imagine that a city as public-spirited as San Francisco could possibly be doing its thousands of golfers a service by closing Sharp Park, and from an historical perspective, shuttering so venerable a facility would represent one of the sadder moments in the annals of American public golf. But to do so based in any way upon either a misunderstanding or misrepresentation of what was written in *The Missing Links* would be especially unfortunate, and I would urge the relevant parties *not* to fall victim to any such mischaracterizations.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Wexler', with a stylized, cursive script.

Daniel Wexler

Joe Faulkner
2479 45th St.
San Francisco, CA. 94117

July 31, 2009

To Whom It May Concern

Alister MacKenzie and the Sharp Park Golf Course

I write this letter to correct false information about me and my work that has been spread by advocates of closing the Sharp Park Golf Course, including Mr. Brent Plater and the Center for Biological Diversity and related entities. They have been misusing my name and misrepresenting my work and my opinion about the history and design of the golf course. And I want it to stop.

Specifically, I have seen a letter, dated July 20, 2009 from Mr. Plater to Pacifica Planning Director Michael Crabtree, which identified me as "a San Francisco golf program employee and author of a history on San Francisco golf wrote in 1978," and attached a copy of a webpage from the "Restore Sharp Park" project of the Center for Biological Diversity and Nature in the City, that identified me as the author of one of "... the only two published histories about Sharp Park Golf Course, both of which conclude that there is no MacKenzie legacy at the course today." (I enclose a copy of that letter with its attachment.)

I have learned also that Mr. Plater in a July 7, 2009 power point and oral presentation to the San Francisco Park and Recreation Open Space Advisory Committee, made a similar claim that I have published a golf history that concludes that "what exists at Sharp Park today has nothing to do with Alister MacKenzie's design," which "really doesn't exist any more," and was "washed away into oblivion".

Mr. Plater's and his organizations' statements about me and my conclusions about Sharp Park are false and misleading. He did not contact or speak with me before making his July 7 presentation or writing his July 20 letter.

I am not, and have never been a published golf historian. I am a greens keeper at a San Francisco golf course. In 1979, when I was an undergraduate at San Francisco State University, I wrote a class paper on the subject of San Francisco's public golf courses. In 2007, I provided a copy of that paper to the San Francisco Golf Task Force, of which Mr. Plater was a member. (I enclose copies of the two pages of my class paper that deal with Sharp Park.)

Nowhere in my college class paper do I say or "conclude" that the Alister MacKenzie-designed golf course at Sharp Park was destroyed or "washed away," or that there "is no MacKenzie legacy at the course today." These are Mr. Plater's arguments, not my statements or my conclusions—or my opinions.

To clear the record, I will here state my opinions and conclusions about the history and architecture of Sharp Park, based upon a lifetime of being a San Francisco resident and a golfer on the city's courses, including Sharp Park, and a greens keeper on golf courses in the city.

As it exists and as golfers play it today, Sharp Park has 12 holes—all lying west of Highway One—that are original holes designed by MacKenzie. Two other holes near the ocean (current holes 12 and 16) are played in original MacKenzie fairways, but do not have original greens. The course today lacks five of its original holes (being original holes numbers 3, 4, 6, 7, and 8) that were taken out of play when a seawall was built some time after MacKenzie's death, and were replaced by four new holes east of Highway One, which I believe were designed by his assistant Jack Fleming. Bo Links, a San Francisco golf writer, historian, and amateur golf architect, has obtained copies of old news reports, including hole descriptions, and course maps from the time of Sharp Park's opening in 1932, as well as old and recent aerial photographs, which clearly show the continuing existence of the original MacKenzie holes west of Highway One. Mr. Links' source materials are more extensive and more reliable than what I used years ago as the basis for my undergraduate class paper.

Today's Sharp Park Golf Course is nearly 80 years old, so naturally there have been some changes in its remaining original holes, but these have been relatively minor, such as trees growing, the shapes of sand traps changing, and some traps filling-in with grass. This sort of change happens over the years at historic golf courses, as at all historic landscapes. It does not mean that Sharp Park's essential character or worth have been lost or destroyed. They have not been. And it certainly does not mean that MacKenzie ceased being the architect.

Alister MacKenzie was one of history's greatest golf architects, renowned for his beautiful, functional landscapes. San Francisco and Pacifica are lucky to have at Sharp Park such a beautiful public golf course created by such an artist. And I hope that the environmentalists, golfers, politicians, and other good people of these cities will work together to preserve the artwork of this master, while preserving as well the creatures—including the golfers—that now inhabit and use and enjoy that masterwork.

Joe Faulkner

cc: Mr. Brent Plater
Center for Biological Diversity



From: Brent Plater (mailto:bplater@ggnrbigyear.org)
Sent: Monday, July 20, 2009 11:53 AM
To: Crabtree, Michael
Subject: <no subject>

Hi Michael,

My name is Brent Plater, and I'm one of the advocates working to Restore Sharp Park.

I've reviewed the short summary available on-line about the proposal to landmark the links at Sharp Park Golf Course. I think that this summary is short on facts that would help the Commission make a better decision, and therefore I would like equal time to Bo Links to make presentation tonight to the Commission.

I've noted that Pacifica's historic landmark ordinance permits "any interested party" to present testimony or documentary evidence at hearings on applications, and I'm hoping you will grant me the same opportunity afforded Mr. Links.

In the meantime, I've pasted below an article about the historic arguments about the property below, and provide you two links to excerpts from the only two published histories about Sharp Park golf course, both of which conclude that there is no MacKenzie legacy at the course today. In Mr. Links' previous statements about the matter, he has ignored or mis-cited these histories, and I'd like an opportunity to ensure that the Commission receives copies of these documents.

Thank you.

Brent Plater
415-572-8989

http://www.restoresharpark.org/SharpPark/GolfCourseHistory_JFaulkner.pdf

<http://www.restoresharpark.org/SharpPark/MissingLinksSharpPark.pdf>



The proponents of retaining Sharp Park as a golf course cannot base their case on the popularity of golf, as the sport is declining rapidly across the nation. Nor can they tout the financial benefit of golf, as Sharp Park loses money every year. So they have instead turned to sophistry, claiming the site should be landmarked because Alister MacKenzie

designed it.

MacKenzie helped revolutionize golf architecture in the last century by insisting that courses "imitate the beauty of nature," rather than be in conflict with it. But MacKenzie ignored his own maxim when he designed Sharp Park. The project required dredging and filling this delicate coastal landscape for a staggering fourteen months in order to create enough dry land for an 18-hole golf course. And in perhaps his greatest ecological mistake, MacKenzie leveled a coastal barrier that provided Sharp Park with natural protection from the surging Pacific Ocean, replacing it with seven links so that golfers could view the sea.

The flaws in this design became evident almost immediately. Opening day of the golf course was delayed twice due to excess water on the course. Then in 1938, a massive coastal storm surge, no longer held at bay by the natural barrier MacKenzie destroyed, inundated the course and severely damaged all seven of MacKenzie's signature beach-side holes. The subsequent routing of Highway 1 through Sharp Park destroyed another MacKenzie link, permanently bifurcating MacKenzie's original design.

San Francisco eventually decided to radically alter what remained of MacKenzie's layout. The city constructed a levee along the coastal edge of Sharp Park, in places 30 feet high, destroying the ocean views that were a defining element of MacKenzie's design. And in 1972 Robert Muir Graves redesigned Sharp Park, moving several links into an upland canyon.

But rather than solving the flooding problem, the levee and redesign exacerbated it. The new design blocked the natural water seeps and outflows through Sharp Park to the ocean, and the course now floods annually during normal winter rains: with freshwater.



Normal winter rains flood many areas of Sharp Park, and the Golf Course's attempts to drain the water kills California red-legged frogs, the largest frog in the West, made famous by Mark Twain's *Celebrated Jumping Frog of Calaveras County*.

Currently San Francisco attempts to prevent the freshwater flooding of the golf course by pumping water through the levee, but this is killing the California red-legged frog—a threatened species also known as Twain's Frog, because it is the central character in Mark Twain's short story "The Celebrated Jumping Frog of Calaveras County." In addition, the operation of the golf course threatens the San Francisco garter snake—an endangered species considered to be the most beautiful serpent in North America—as mowing operations kill the snakes while they bask in the sun on the course's fairways. Because these two species are protected by the Endangered Species Act, the United States Fish and Wildlife Service warned San Francisco in 2005 to stop harming these species or face potential civil and criminal liabilities. The golf course managers responded by leaving standing water on the course for most of the year, causing further damage to the course.



A California red-legged frog at Sharp Park.



A San Francisco garter snake at Sharp Park on September 29, 2008.

Consequently, there is simply no MacKenzie legacy at Sharp Park today. Joe Faulkner, a San Francisco golf program employee and author of a history on San Francisco golf, wrote in 1978 that MacKenzie's design "would never be the same" after the coastal storms decimated the course, and claimed the Robert Muir Graves redesign was like "taking a house with a beach view and turning it 180 degrees to face a mountain slope." Daniel Wexler, writing in his book "Missing Links," noted that MacKenzie's Sharp Park was "shortly lived" and "washed into oblivion by a coastal storm." He concluded that "no appreciable trace of [MacKenzie's] strategy remains in play" at Sharp Park today.]

But there are cultural and historic artifacts on the land that can and should be preserved: Sharp Park was the home of a temporary internment camp during World War II, and Native American artifacts have been found throughout the area. Currently these legacies go uninterpreted and remain inaccessible except to individuals with the ability and desire to pay around \$40 for a round of golf: all other users are escorted from the course.

Moreover, in 2004 a recreational survey of San Franciscans conducted by PROS Consulting found that the number one recreational demand is for more hiking and biking trails: golf finished 16th out of 19 options in the same survey. Yet the City is currently forced to cut services at recreational centers and open spaces while it subsidizes the underused golf course at Sharp Park, exacerbating the existing inequity in the distribution of recreational services in the Bay Area.

This is why residents of both Pacifica and San Francisco, historians, landscape architects, various recreation proponents, as well as conservationists, environmentalists, and park advocates have come together to urge the restoration of Sharp Park. Restoring Sharp Park will preserve an important ecological landscape, link us to the history of the land, provide increased recreational opportunities that Bay Area residents currently demand, guard our coastline from flooding events exacerbated by climate change, and help recover two endangered species. Nothing could be more prudent or cost-effective for the public than restoring Sharp Park and creating a protective habitat and recreational site that many can enjoy for generations to come.

Isabel Wade, Board Member, San Francisco Neighborhood Parks Council
Chris Carlsson, Director, FoundSF.org, a living archive of San Francisco history
Lawrence Cuevas, Landscape Architect
Brent Plater, Director, Restore Sharp Park, www.restoresharpark.org
Derek Hoyer, Golfer Against Sharp Park

Checked by AVG - www.avg.com
Version: 8.5.375 / Virus Database: 270.13.20/2249 - Release Date: 07/20/09 06:16:00

SHARP PARK

Being that the City had come by the lots at Sharp Park so cheaply (free in fact) they decided to bring in one of the world's foremost golf architects, Dr. Alister Mackenzie. The fact that Mackenzie and his assistant at that time, Jack Fleming, were able to design a golf course along the San Mateo County coast line was quite an accomplishment in itself. They managed to accomplish this difficult feat by dredging for fourteen months in order to build up the fairways.

On May 15, 1930 Robert Hunter, Jr. was appointed the superintendent of construction for Sharp Golf Course at a fee of \$750 for ten month's work. Four and a half months later on October 2, 1930 Willis Polk and Company was authorized to prepare plans and specifications for the starter's house at the golf course. The original cost of playing golf was \$2.00 per month and a card good for all three courses became available in May 1932 for \$5.00.

The courses's opening in 1932 was twice delayed due to wet conditions. The golf course officially opened April 1, 1932. Perhaps the fact that even the opening of the course had to be delayed twice due to winter rains should have warned of the drainage problems this site would always face. Normally a golf course will welcome the rest and revitalization the winter rains bring. In Sharp Park's case the winter rains brought about the annual flooding of Laguna Salada out on to playable portions of the golf course. This problem still persists 47 years later even though a 4,000 gallon water pump has been installed. Two factors contribute to the poor drainage problem at the Sharp Park site. First and foremost

is the fact that the course is built at sea level and thus was susceptible to changing tides. The second factor was the annual flooding of Laguna Salada itself.

The golf course that opened on April 1, 1932 was becoming increasingly popular until it was severely damaged by high tides in a storm during the winter of 1938. The holes constructed on or near the beach were undated by the unchecked tides of the storm. This resulted in severe damage to the beach holes - Numbers 2 through 8. The course, generally considered one of the best tests of golf in Northern California would never be the same. The beach holes had to be abandoned and reconstruction was forced across the Coast Highway up into what is now referred to as "The Canyon Holes". The effect was much the same as taking a house with a beach view and turning it 180 degrees to face a mountain slope. This was the most drastic architectural change the Sharp Park layout would ever face. Even the State Highway construction in the early 1960's that wiped out one par three hole would not have as damaging effect as nature.

Sharp Park remains very busy to this day drawing players both from the City and from down the peninsula. During the winter, however, as the water table rises, the course becomes less playable and suffers a significant drop in play - more so than other municipal courses during the winter. One winter in the early 1970's flooding was so thorough that the unchecked water nearly reached the clubhouse.



DeVries Designs, Inc.

San Francisco Parks and Recreation Commission
Mr. Jim Lazarus, Chairman
McLaren Lodge
501 Stanyan St.
San Francisco, CA. 94117

November 18, 2009

To San Francisco Parks and Recreation Commission:

I am a golf course architect and am writing to urge you to preserve the historic 18-hole Sharp Park Golf Course. I am an expert on Alister MacKenzie's designs and was responsible for the restoration of his first design in America, the Meadow Club, which is located in Fairfax, in Marin County. I grew up working at Crystal Downs Country Club, which was designed by Alister MacKenzie in Frankfort, MI, in 1929 and is one of the top 20 courses in the world. I have studied and been involved with many MacKenzie courses throughout the world.

To say that Sharp Park is an important part of the history and legacy of golf course architecture is an understatement. Golf courses are the environmental and artistic composition of the land by design for a purposeful pastime and represent an excellent way for people to bond with a place. Sharp Park is the world's greatest golf course architect's most significant public golf course and needs your support to continue providing your constituents a place to experience MacKenzie's brilliance.

The San Francisco garter snake and red-legged frog have found a refuge on the golf course since its inception 80 years ago. The golf course is managed in an environmentally friendly manner and with high environmental ideals; if it wasn't, the San Francisco garter snake and red-legged frog wouldn't be there.

I ask you to support the preservation of this unique golf course for everyone's enjoyment.

Respectfully submitted,

Mike DeVries

Mike DeVries
Phone: (231) 933-9169

Golf Course Architecture
421 West Ninth Street • Traverse City, Michigan 49684

www.devriesdesigns.com
Fax: (231) 933-9353

Ken Venturi

Rancho Mirage, CA.

October 12, 2009

Dear Friends of San Francisco Golf,

As a native San Franciscan, I was both thrilled and very proud this week as the greatest golfers from America and around the World met at Harding Park to contest the President's Cup. As I watched the competition unfold, I reflected back through my own seven decades playing golf in the great golfing town of San Francisco.

With my thoughts returning to my youth in San Francisco, however, I have been alarmed by news that the city's other wonderful 18-hole municipal courses, Sharp Park and Lincoln Park, are in jeopardy. The news of Sharp Park is particularly distressing. To me it is unthinkable that San Francisco would seriously contemplate the destruction of that Alister MacKenzie masterwork.

Sharp Park is a great course of the old school: a seaside course, designed by one of history's greatest architects, where the wind and weather dictate the play of the game. Dr. MacKenzie's beautiful design does not punish with narrow fairways and heavy rough, but rather charms and inspires and exhilarates with beauty. Dr. MacKenzie does not force golfers to hit any particular shot, but instead gives them options to challenge their imaginations. Sharp is an unpretentious place, where golfers enjoy a scenic walk in the salt air, then a sandwich and a beer in an old-fashioned pub. In these ways, Sharp connects golfers to the Scottish public course roots of the game. This is Dr. MacKenzie's great gift to the American public golfer.

Without the public courses, golf becomes inaccessible. The game shrivels and dies. The glorious restoration of Harding must not be at the expense of Sharp or Lincoln. So I write this letter to urge my friends and fellow-San Francisco Bay Area golfers to preserve Dr. MacKenzie's legacy, and defend San Francisco's golf heritage and public courses. Defend them with your time, your money, and your passion. Do not let anybody destroy Sharp or Lincoln.

See you around the links.



Ken Venturi

Honorary Chairman

San Francisco Public Golf Alliance

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PUBLIC GOLF ALLIANCE**



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PLANNING DEPARTMENT
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235 Montgomery St., #400, San Francisco, CA. 94104 * 415-392-5431, ext. 203 * info@sfpublicgolf.com

October 25, 2011

San Francisco Planning Department
Attn: Bill Wycko, Environmental Review Officer
1650 Mission St., #400
San Francisco, CA. 94103

Re: Comment Letters on
Significant Natural Resources, etc.
DEIR No. 2005.1912E

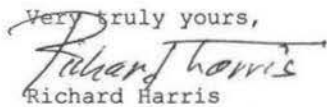
Dear Planning Department and Mr. Wycko,

San Francisco Public Golf Alliance has received copies of several public comment letters, addressing the Planning Department's Draft Environmental Impact Report on the San Francisco Natural Areas Management Plan, and in particular the issue of Sharp Park.

We are unclear whether these letters have been separately submitted to the Planning Department. So as a matter of caution, we forward the letters from the following people to you.

Michael L. Keiser, Bandon, Or.
Sean Tully, San Rafael, CA.
Stephen F. Mona, World Golf Foundation,
St. Augustine, Fl.
Allen Wronowski and Joseph P. Steranka,
PGA of America, Palm Beach Gardens, Fl.
J. Rhett Evans, GCSAA, Lawrence, KS.

We ask that you file these letters with the public comment letters in this file.

Very truly yours,


Richard Harris
San Francisco Public Golf Alliance

encls.

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September 22, 2011

San Francisco Planning Department
1650 Mission Street, #400
San Francisco, CA 94103

RE: Sharp Park Golf Course

To Whom It May Concern:

01

I am writing to express my complete and enthusiastic support for designating the incomparable Sharp Park Golf Course a "historical resource." Its architect, Alister MacKenzie, is one of the great masters of the 700 year old craft and Sharp Park is one of his masterpieces. It is truly a work of living art. As the owner of two golf resorts, Bandon Dunes in Bandon, Oregon and Cabot Links in Nova Scotia, I have a very strong opinion that Sharp Park should not only be preserved but maintained to the very highest standard.

Sincerely,

Michael L. Keiser

MLK/ml

cc: Richard Harris

Michael Keiser
1750 N. Lakeview
Chicago, Illinois 60614
773-748-0400 • 773-748-1125 fax

Bandon Lake Drive
Bandon, Oregon 97003
www.bandondunesgolf.com
531.342.4480 • 531.342.8100 fax

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Sean Tully
10 Golf Ave.
San Rafael, CA
stully@meadowclub.com

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October 1, 2011

San Francisco Planning Department
Attn: Bill Wycko, Environmental Review Officer
1650 Mission St., #400
San Francisco, CA. 94103

Re: Supporting "Historical Resource"
Designation for the Sharp Park Golf Course
Significant Natural Resource Areas, etc.
DEIR No. 2005.1912E

Dear San Francisco Planning Department,

My name is Sean Tully and I have been associated with golf in the Bay area for the last 11 years when I became the Assistant Superintendent at Meadow Club, another Alister MacKenzie designed golf course that is in Marin County. From 1999 to 2005, we did a restoration at Meadow Club to restore as close to the original design as possible. In doing some research on Meadow Club, I rediscovered some of the early history of golf in the Bay area. For the last 10 years, I have been researching golf in the Bay area with the intention of writing a book. I'm also involved with a small group of researchers from around the world that are working on a chronology of the life and times of Alister MacKenzie. In addition, I have assisted a number of golf architects engaged in restoring golf courses by providing historical documentation of the work done on those courses.

In 1997, I made my first visit to the Bay area and one of my first stops was to see Sharp Park. I was taken by the seaside setting and what would have been there originally in 1932 when the course was first opened. Over the years of my research I have found some interesting things about Sharp Park:

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In 1919, John McClaren envisioned the Sharp Park property to one day be a golf course and was already laying the groundwork to plant trees and make a fresh water lake on the property.

In 1925, even before Harding Park was open there was still concern that there were not enough golf courses to satisfy the number of golfers. There was already talk of adding another golf course to meet the needs of public golfers and some options were looked at including the property at Sharp Park and another at McClaren Park.

In 1929, with nothing done to address the still growing numbers of golfers, additional plans were floated that included turning Harding Park into a 36 hole facility and plans had already been drawn up for both Sharp Park and McClaren Park by both Alister Mackenzie and his partner Robert Hunter!

Sharp Park had at least two benefits that helped to get the golf course built. The first is that the property was already owned by the city and the only cost was building the golf course itself. Secondly, the property would have made it one of, if not the only, municipal seaside links courses in the country.

In giving Sharp Park a historical significance one only needs to look at the body of work that Alister MacKenzie did in his capacity as a Golf Architect. His career spanned 27 years with his latter years showing a very distinguished list of golf courses. He had been a consulting architect for the R&A and St. Andrews in particular. He had only just recently finished the Cypress Point Golf Club, Pasatiempo Country Club, and Union League Golf Club (now Green Hills Country Club) so his work was well known in the Bay area and he was known around the world as one of the best architects in the business. When the Jockey Club in Buenos Aires, Argentina was looking for a world renowned architect, they contacted Findlay Douglas a top amateur golfer and President of the United States Golf Association—he gave them the name of Alister MacKenzie.

In looking at the Top 100 courses in the world as compiled by Golf Magazine for 2011, MacKenzie has four courses in the Top 20! The next closest architect is Old Tom Morris with three, considered one of the greatest golfers in his day as well as a noted architect—not bad company.

MacKenzie not only designed world class golf courses, he also designed and built courses with the simple idea that there should be economy in design and construction. One of his major selling points was the money that he could save

SFPGA-2

on construction costs compared to other architects of the day. If he could build a golf course over a shorter period of time and have it grown in and open for play, the course would be in a better financial situation from day one.

His designs over the later part of his career in the early 1930's show a shift to a reduced use of bunkers that relies on a more strategic placement. This work is exemplified at Augusta National, Bayside Golf Links (no longer existing), and Sharp Park. The added benefit of fewer bunkers is a reduction in construction costs and a reduction in the daily maintenance of the bunkers after the course opens.

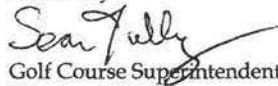
Of all the courses MacKenzie built, Sharp Park is the only course where he was able to use one of the most famous holes in golf, the Lido Hole. The Lido Hole is named after The Lido Golf Club that was being built on Long Island in the early 1910's. To draw attention to the project a world-wide competition was formed with the intent of designing a hole for the golf course with the winners drawing being implemented into the design of The Lido Golf Club.

The hole at Sharp Park that follows this design is the original 5th hole, which is now the 17th hole. Annually there is a Lido competition held by the Alister MacKenzie Society that celebrates his original design by holding a similar competition of designing a two-shot hole.

Sharp Park Golf Course was and is a wonderful site for golf and the possibility of restoring parts of it to its original design would be incredible. Increasing the playability and sportiness of the course will bring more golfers to the course and add to the enjoyment of golfers of all age and skill levels.

In addition to what the San Francisco Public Golf Alliance has already laid out in making its case for Sharp Park Golf Course, I acknowledge that I have read and strongly agree with the determination that Sharp Park Golf Course be considered a "historical resource" under the California Environmental Quality Act.

Sean Tully


Golf Course Superintendent
Meadow Club

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WORLD GOLF

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September 29, 2011

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CITY & COUNTY OF S.F.
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Chief Executive
U.S. European TourSan Francisco Planning Department
Attn: Bill Wycko, Environmental Review Officer
1650 Mission St., #400
San Francisco, CA. 94103JIM ARMSTRONG
Executive Director
PGA TOURRe: Supporting "Historical Resource"
Designation for the Sharp Park Golf Course
Significant Natural Resource Areas, etc.
DEIR No. 2005.1912EMIKE BUTZ
Executive Director
USPGAARTIE TAYLOR
Chief Executive
The PGA

Dear San Francisco Planning Department,

TOM FINCHEM
Chief Executive
PGA TOUR

I am writing to you in support of the preservation of Sharp Park Golf Course as we know it today. Sharp Park Golf Course, designed by Master Architect, Dr. Alister MacKenzie, is an historical property, an important part of San Francisco's history, and should be safeguarded from any significant modifications that will change its architectural integrity.

JESSE SALDIVAR
Executive Director
US Business Affairs
Shell Oil Company

The San Francisco Public Golf Alliance, in a letter to you dated September 20, 2011, comprehensively outlined all of the reasons it supports the determination of the San Francisco Planning Department that the Sharp Park Golf Course is an "historical resource" under the California Environmental Quality Act.

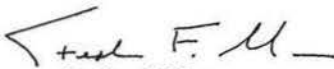
JOE STERANKA
Chief Executive Officer
PGA of America

The World Golf Foundation agrees with and supports the contention and conclusion of the San Francisco Public Golf Alliance.

MIKE WHAN
Commissioner
LPGA

Please do not allow the proposed alteration projects to occur. To do so would effectively cause one of America's greatest golf treasures to be irrevocably negatively impacted.

Sincerely,

STEVE MONA
Chief Executive Officer

Stephen F. Mona
Chief Executive Officer

One World Golf Place • St. Augustine, FL 32092 • www.worldgolffoundation.org • 884-840-4000 | Shell Oil Company • Founding Partner

The mission of the World Golf Foundation is to develop and support initiatives that positively impact lives through the game of golf and its foundation values.



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Joseph P. Steranka
Chief Executive Officer

September 27, 2011

San Francisco Planning Department
Attn: Bill Wycko, Environmental Review Officer
1650 Mission St., #400
San Francisco, CA. 94103

Re: Supporting "Historical Resource" Designation for the Sharp Park Golf Course
Significant Natural Resource Areas, etc. DEIR No. 2005.1912E

Dear San Francisco Planning Department,

04

We are writing to you today to voice The PGA of America's wholehearted support for the proposed designation of Sharp Park Golf Course as a historical resource of the City and County of San Francisco. We feel strongly that as one of renowned architect Alister MacKenzie's final designs prior to his death, it holds true historic value not only for your region but for the U.S. golf industry as well.

05

We also feel strongly that as a provider of local jobs and as an attraction that can bring golfers to your area from outside your region, there are considerable economic reasons to continue operating Sharp Park Golf Course. The PGA of America is proud to present golf as an important component of local and regional economies as well as a healthy and fun recreational activity that can be enjoyed by young and old, men and women, as a family activity, with friends or business associates, no matter their economic or ethnic background.

Furthermore, municipal golf facilities such as Sharp Park Golf Course are critical to keeping golf affordable and accessible to all who want to participate in this wonderful game. Some of the biggest names in professional golf are products of municipal and military-operated golf courses, as are countless other professional and amateur players. Take away the municipal course option, and many of these highly-successful golfers may never have had the chance to pursue their passion for the game.

Finally, golf facilities across the country have proven themselves to be good stewards of the environment, providing green space and habitat for plants and animals while using considerably less water per acre than developed tracts of land.

THE PROFESSIONAL GOLFERS' ASSOCIATION OF AMERICA
100 Avenue of the Champions | Palm Beach Gardens, Florida 33418
T: (561) 624-8400 | www.pga.com

SFPGA-2

September 27, 2011
Page 2

In closing, we hope that this letter, along with the wide-ranging support from both your local community and golf industry, will convince you of the importance of the historical designation as well as the benefits of continuing to operate Sharp Park Golf Course.

Very Respectfully,


Allen Wronowski, PGA
President
The PGA of America


Joseph P. Steranka
Chief Executive Officer
The PGA of America

cc: Congresswoman Jackie Speier
Hon. Ed Lee, Mayor, City and County of San Francisco
Hon. Mary Ann Nihart, Mayor, City of Pacifica
David Chiu, President, San Francisco Board of Supervisors
Carole Groom, President, San Mateo County Board of Supervisors
Philip Ginsburg, General Manager, San Francisco Recreation and Park Department
Charles Edwin Chase, AIA, President, San Francisco Historic Preservation Commission
San Francisco Public Golf Alliance

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CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
RECEPTION DESK

October 6, 2011

San Francisco Planning Department
Attn: Bill Wycko, Environmental Review Officer
1650 Mission Suite 400
San Francisco, CA 94103**Re: Supporting "Historical Resource Designation for
the Sharp Park Golf Course**

Dear San Francisco Planning Department,

On behalf of the Golf Course Superintendents Association of America (GCSAA) I am writing in support of the "historical resource" designation for the Sharp Park Golf Course.

GCSAA is a leading golf organization and has as its focus golf course management. Since 1926, GCSAA has been the top professional association for the men and women who manage golf courses in the United States and worldwide. From its headquarters in Lawrence, Kan., the association provides education, information and representation to 19,000 members in more than 72 countries.

GCSAA's mission is to serve its members, advance their profession and enhance the enjoyment, growth and vitality of the game of golf. The association's philanthropic organization, The Environmental Institute for Golf, works to strengthen the compatibility of golf with the natural environment through research grants, support for education programs and outreach efforts.

Sharp Park Golf Course is a historical and cultural resource, and is recognized as such by local, state and national entities. Not only was Sharp Park designed by Alister MacKenzie, one of the greatest golf course architects of all time, but it is also unique because it is one of the few municipal courses he designed.

Golf is a game that can be played by people of all ages and abilities, and 80% of the golf rounds played in the United States

*Advocacy ~ Professional Development ~ Community
Environmental Stewardship ~ Responsiveness*

06

06

Cont.)

SFPGA-2



are played on public golf courses such as Sharp Park. Preserving this historical resource as a place of recreation and good health for all of the people of the City and County of San Francisco and the City of Pacifica, and all surrounding areas, is imperative.

Thank you for your time and for allowing GCSAA to express support of the San Francisco Planning Department's determination that Sharp Park Golf Course, designed by Alister MacKenzie and opened for play in 1932, is a "historical resource" under the California Environmental Quality Act.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Rhett Evans".

J. Rhett Evans
Chief Executive Officer

cc: The Honorable Jackie Speier, U.S. House of Representatives
The Honorable Ed Lee, Mayor, City and County of San Francisco
The Honorable Mary Ann Nihart, Mayor, City of Pacifica
Mr. David Chiu, President, San Francisco Board of Supervisors
Ms. Carole Groom, President, San Mateo County Board of Supervisors
Mr. Philip Ginsburg, General Manager, San Francisco Recreation and Park Department
Mr. Charles Edwin Chase, AIA, President, San Francisco Historic Preservation Commission
The San Francisco Public Golf Alliance

GCSAA is dedicated to serving its members, advancing their profession, and enhancing the enjoyment, growth and vitality of the game of golf.

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**SAN FRANCISCO
PUBLIC GOLF ALLIANCE**



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**CITY & COUNTY OF S.F.
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RECEPTION DESK**

235 Montgomery St., #400, San Francisco, CA. 94104 * 415-392-5431, ext. 203 * info@sfpublicgolf.com

October 31, 2011

San Francisco Planning Department
Attn: Bill Wycko, Environmental Review Officer
1650 Mission St., #400
San Francisco, CA. 94103

Re: Comments of San Francisco
Public Golf Alliance
Significant Natural Resources, etc.
DEIR No. 2005.1912E

Dear Planning Department and Mr. Wycko,

San Francisco Public Golf Alliance represents public golfers and supporters of public golf in San Francisco and the Bay Area. We are interested in San Francisco's Significant Natural Resource Areas Management Plan to the extent that it relates to and affects the historic Sharp Park Golf Course in Pacifica.

This letter is in addition, and supplementary to, a letter dated September 20, 2011 which we have previously submitted to you on this subject.

01 { **1. Potential significant effect on the Sharp Park Golf Course of logging of approximately 15,000 eucalyptus trees at Sharp Park in the canyons to the east of the Coast Highway.** We are concerned with potential significant adverse effects on drainage and downstream flooding, specifically flooding at the Sharp Park Golf Course and its surrounding residential neighborhoods - the Fairway Park and West Sharp Park neighborhoods of Pacifica -- arising out of the removal of significant numbers of mature eucalyptus trees (we understand that the SNRAMP goal is removal of 15,000 trees), and their replacement by native vegetation. The trees are on slopes within the Sanchez Creek watershed, which drains through the Sharp Park Golf Course. The golf course and its ponds and

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surrounding neighborhoods are already subject to winter flooding. Storm-relief pumping, to move excess storm water from Laguna Salada and Horse Stable Pond and their wetlands, is already constrained by concern for the effects of pumping on winter seasonal egg-laying by the California red-legged frog (CRLF). Therefore, there should be no logging if there is a possibility that erosion or any other effects of logging would result in any additional runoff to the golf course beyond current levels from the areas of Sharp Park to the east of the Coast Highway.

At page 376, the Draft EIR states—unconvincingly—that flooding will be “less than significant”:

“In Sharp Park **removing eucalyptus trees** in the upland area **would increase incident rainfall that reaches the ground and could increase the rate of runoff** into Sanchez Creek, the main drainage for this watershed. However, the increase is not expected to be substantial in comparison to the size of the drainage area and considering the normal range of runoff volume; additionally, **the area would be revegetated following tree removal. Over time,** the proposed project **would reduce surface runoff by dispersing water more widely** over the ground surface and slowing runoff velocities, thereby increasing infiltration. **Therefore, the flooding impacts** of the programmatic [tree removal] projects would be **less than significant.**”
(Emphasis added)

But this is a non-answer. And it is not comforting. The assertion that “the increase [in rate of runoff into Sanchez Creek] is not expected to be substantial” is not supported by any analysis. What does “over time” mean? **When** will the revegetation take place? And **what** will be the relative water absorption/transpiration ability of the replacement vegetation, as compared to the existing eucalyptus (which are known to have high water absorption capacity)? These questions are not answered. Since it takes only one heavy rainfall year—or week, for that matter—for the seriously damaging effects of flooding to occur, it is inappropriate to call the flooding effects “insubstantial,” when the duration and the extent of the acknowledged increased runoff vulnerability is unknown and unanalyzed by the DEIR.

In addition, the logging project will likely result in a substantial increase in erosion of surface soils, which will then be transported by Sanchez Creek downstream where they will settle in Laguna Salada, Horse

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Stable Pond, and the channel which connects the two. The ecological values and water capacity of these features is already seriously compromised due to siltation, which in fact is a principal reason for the ecological restoration proposed within the golf course. Without a detailed analysis of the erosion and siltation effects of the logging project, and detailed mitigation measures to prevent additional erosion and siltation, the logging project will both compromise the proposed ecological restoration project centered around Laguna Salada, and will increase flooding risk to the golf course and adjacent residential neighborhoods.

Therefore, rather than "insubstantial," it would be more accurate to characterize the erosion, siltation and flooding risks as "substantial," and then to analyze measures that might mitigate or eliminate these risks, such as: (1) helicopter logging to reduce the risk of erosion; (2) erosion-prevention measures; (3) timing of the logging and the native plant replanting so as to minimize the amount of time in which the ground is unprotected; and (4) interim measures to absorb water from the logging site, pending grow-in of the replacement native plants. Without these and other analyses, it is better to leave the existing eucalyptus groves in place than it would be to log the land and risk uncertain flooding risk to the historic golf course and its surrounding neighborhoods.

02

2. Implication of Pacifica, San Mateo County, and Local Coastal plans on the logging questions. For the reasons described in paragraph 1, it is incorrect to say that the Pacifica Logging Ordinance and the San Mateo County Significant Tree Ordinance are not applicable. Likely one or both plans are made applicable to that part of Sharp Park lying east of the Coast Highway by the Local Coastal Plan. But rather than cavil over the applicability of the local governmental ordinances, the issue is a substantive one of preventing activity (logging) on land outside the Coastal Zone from having potentially damaging results (flooding) on properties (historic golf course and residential neighborhoods) and natural resources (habitat of frogs and snakes) lying within the Coastal Zone. The DEIR acknowledges that logging presents the risk of additional runoff into Sanchez Creek (and hence to Sharp Park Golf Course). Even if this were only a one-time event, this would have potentially significant consequences for the historic golf course, the neighborhoods, and the endangered species habitat. Accordingly, this must be

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analyzed as a significant risk, and mitigation and avoidance options must be discussed and analyzed.

04

3. Closure of Hole 12 would constitute "significant impact" upon the historical resource of the Sharp Park Golf Course. Public Golf Alliance understands that the city's biological consultants want to close this hole entirely, and convert the area to the west of the connective channel to a native plantings area that would serve as upland habitat for the California red-legged frog (CRLF) and San Francisco garter snake (SFGS). Although the existing hole is not a 100 percent original hole, it does have its original tee and most of the original fairway, so it is significant to the original MacKenzie golf course.

05

(a) Our first preference is that Hole 12 be kept in play; move the green 20-30 yards to the northwest of the current green, at the foot of the sea wall, and replace the first 75 yards west of the connective channel (nearly to the current green location) with native plantings, and convert the newly native-planted area to upland habitat for the frog and snake; the new natural area would be completely off-limits to golfers; the current cart path would be replaced by a wooden bridge similar to the newly-constructed wooden walkways at Mori Point. The bridge would access the green area and the current 13th tee, which in turn would be connected to the 13th fairway by another long wooden bridge over the expanded connective channel. This plan has the environmental advantage of maintaining a golf presence at the southwestern corner of the golf course - a constant presence of golfers and occasional presence of maintenance workers, that would discourage trespassers from coming down onto the natural area with their pets, to harass the native species. Both Karen Swaim and Mark Jennings say that the golfers have a beneficial effect of patrolling the property to keep trespassers and their domestic animals away from the endangered species.

06

(b) If the determination is made to close Hole 12, this would constitute a significant negative impact on the historical golf course. To best mitigate this effect, we believe the hole should be replaced by resurrecting and restoring an original MacKenzie-designed hole on the west side of Laguna Salada. There are two candidates for this: (i) Original Hole No. 4, a south-to-north 3-par hole of about 150 yards, whose green was located where the back tee on current Hole 17 is today located; and (ii) original Hole No. 6, an east-to-west 3-par hole of about 170 yards located at the northern end of the golf course, whose tee

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was located to the north of the current 17th green, and whose green was located to the southwest of the current 16th tee. Original holes ## 4 and 6 were abandoned in or about 1941, when the Coast Highway was built through the golf course and four new "canyon holes" were built in a canyon to the east of the then-new highway. Both Original Holes ## 4 and 6 appear on the as-built routing map of Sharp Park Golf Course, published in the San Francisco Chronicle in or about April, 1932. (A copy is attached as Exhibit "A"; Original Holes ## 4 and 6 are marked in yellow.) Because restoration of Hole 6 would be problematic due to crowding problems with the current 17th green and 16th tee (which crowding can be plainly seen by comparing the as-built routing map, Exhibit "A", with an aerial photo of the current golf course (see Exhibit "B" hereto), it is our belief that restoration of original Hole No. 4 would be the preferred mitigation for the loss of Hole 12.

4. Hole 13 Should be Retained as a 5-par hole, with its tee to the west of the connecting channel.

07

(a) Regardless the decision as to whether or not to retain Hole 12, it is our position that the existing Hole 13 tee should be retained on the western side of the connecting channel, so that the hole will continue to play as a 5-par hole. This can be accomplished by means of a wooden footbridge from the vicinity of the current 11th green/12th tee across the connecting channel to the location of the existing 13th tee. Hole 13 is one of the original MacKenzie-designed holes; it appears on MacKenzie's 1930 routing map as the 9th hole of the original course, a 580-yard 5-par hole; on the 1932 as-built map, the hole is described as a 538-yard 5-par hole. To shorten this hole to a 4-par hole would constitute significant alteration of the original historic design of both this particular hole, and the golf course as a whole.

(b) An additional reason to maintain the 13th tee in its existing location is that this tee constitutes a continuing presence of golfers and golf maintenance personnel at the southwestern corner of the golf course. The golfers and golf maintenance personnel serve a policing function to defend the wetlands and sensitive habitats from trespassers, vagrants, and dogs.

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(5) Raising Holes 9, 14, 15, and 16 poses the threat of significant adverse change to the historical resource of the Sharp Park Golf Course.

(a) We disagree with the DEIR's characterization of Impact CP-6 (at page 13 of the DEIR Summary), which says that "raising holes 10, 14, 15, and 18 would not result in a substantial adverse change" to the historic Sharp Park Golf Course.

(b) As a preliminary matter, we believe that the DEIR's reference to "Hole 10" is a mistaken reference. We believe that the Department intends to refer to existing Hole #9, which is the 5-par hole that extends for approximately 480 yards along the golf course's southern fence line; this hole's tee is just south of the green of Hole #1; its green is just to the south of the Hole #12 tee. The Department's confusion, we believe, arises from Figure 14 (following page 39) of the Recreation and Park Department's Sharp Park Conceptual Restoration Plan (http://www.sf-recpark.org/ftp/uploadedfiles/wcm_recpark/SharpParkGC/Tetrachfinalrpt110609.pdf), which identifies this 5-par hole as number 10 on the city's plan to restore the golf course. However, it is Hole 10 on the Figure 14 map (copy attached as Exhibit "B") because the city's golf consultant inserted between current holes ## 6 and 7 on his conceptual map of the remodeled course a new-to-be-constructed hole to the east of the Coast Highway; the insertion of the new, not-yet-constructed hole would result in renumbering of all holes thereafter. Because that proposed new hole between current ##6 and 7 is not yet part of the golf course, and in fact may never be built, we believe it makes sense to refer to the golf holes by their current number, as they are being played as of October, 2011. Therefore, we prefer to refer to the southern boundary 5-par hole by its current hole number, which is Hole 9.

(c) Because it is an historic golf course, designed by a great master architect, Alister MacKenzie, any remodeling of Sharp Park must be handled extremely carefully. This property is a master's work. Restoration work must be done by contemporary master architects and craftsmen who can give appropriate respect to the master's work. If Holes 9, 13, 14, 15, and 18 are to be raised, then this work must be done very carefully, by a master can do this work in a manner that will properly respect MacKenzie's original work. If done in this careful way, using a contemporary master architect, San Francisco Public Golf Alliance believes that the holes can be raised in such

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a way that the impact on the historic quality of the golf course would be less-than-significant. However, without this high degree of care, it is equally possible that significant damage could be done to the historical resource. Hole 15, a one-shot 3-par hole is particularly vulnerable to being damaged by less-than-highest-quality architectural restoration in the event the ground level is raised, precisely because it is a one-shot hole.

(6) Installation of permanent fencing along the seawall and along the wetland border on the golf course has potential to cause significant adverse change to the historic Sharp Park Golf Course.

(a) We disagree with the DEIR comment Impact CP-8 (DEIR, Chapter 1, at page 14) that construction of a fence alongside the seawall would not cause significant change to the historic golf course.

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(b) This is a matter similar to the issue of raising the height of certain fairways, discussed in Paragraph (5), above. To begin with, it is clear from maps of the proposed restoration project that fencing is proposed not only for the seawall, but also along the boundary between the golf playing area and the wildlife habitat area. The locations of both fences has the potential to interfere with the design of the reconfigured golf course at Current Holes Nos. 9, 11, 13, 14, 15, 16, and 17, and at the site of original Hole #4 (which is a potential site for reconstruction of an original MacKenzie-designed hole to replace Current hole #12, as discussed above in Paragraph 4 of this letter).

(c) Accordingly, the location and design of the fencing must be done in conjunction with, and as a function of, the golf architect's work in designing the restored golf course. As discussed above in Paragraph 4, we strongly recommend that this work be done by a preeminent golf architect, credentialed to work on restoration of an historic golf course designed by master architect Alister MacKenzie.

(d) Yet an additional consideration in the location of the fence is the issue of the California Coastal Trail, which currently occupies the top of the sea wall which forms the western boundary of the Sharp Park Golf Course. We want to eliminate potential conflict between the recreational use of the California Coastal Trail and the historical resource of the Sharp Park Golf

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Course. The location of the fence alongside the sea wall will need to take these two uses into consideration. This needs to be under the supervision of the restoration golf architect. Issues of public trails along the tops of seawalls adjacent to golf courses is a commonly-occurring issue at the seaside links golf courses of Scotland, such as North Berwick, Lundin Links, and others. These public uses can be reconciled.

(7) Modifications to Holes Nos. 9, 11, 13, 14, 15, 17, and 18, including but not limited to raising the ground level, and shortening, narrowing, or expanding the sizes of the golf playing areas, has potential to adversely affect the historic golf course. Accordingly, this restoration and remodeling work must be done only by the most highly qualified and experienced golf restoration architects.

(a) For the reasons discussed above in Paragraphs 5 and 6, a top restoration architect, familiar with and experienced in historic golf architectural restoration work, must be involved in the renovation work. The work must be done under his/her direction and supervision.

10

(b) Specifically in the areas where the Sharp Park Restoration Plan will have habitat areas suitable for the frog and snake adjacent to golf playing areas (including but not limited to current Holes 9, 11, 13, 14, 15, and 17) there will be a need to have a neutral or sterile buffer area between the habitat and golf areas, so as to physically separate the golf playing areas from the habitat areas. Wide expanses of open sand would constitute such a neutral/sterile area. We recommend that strong consideration be given to a ribbon of sand stretching the entire length of the golf/habitat border. In fact, this fits the exact description of Current Hole 13 - original Hole No. 9 - as provided by MacKenzie's assistant Jack Fleming, published in the San Francisco Call-Bulletin shortly before the golf course opened on April 1, 1932. Hole 9 was described by Fleming as follows: "A lakeside hole with wide, sandy beach on water side." (Copy attached as Exhibit "C".)

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(8) The EIR should contain a detailed description of the process which led to the design and selection of the proposed Sharp Park Restoration project.

(a) Over the last several years, the City has performed extensive analyses (including the Sharp Park Conceptual Restoration Alternatives Report included as Appendix I) of the endangered species and associated issues at Sharp Park, and engaged in a comprehensive and public effort to analyze numerous alternatives to address those issues. That process resulted in the decision by the City to implement the Restoration project which is now addressed in the Draft EIR. However, the Draft EIR is largely silent regarding how the Restoration project came to be. The Final EIR should rectify this oversight by incorporating into the Project Description section a detailed description of the City studies and decision-making processes that resulted in the City's decision to implement the Restoration project now being analyzed.

(9) Description of restoration project pre-construction mitigation measures is incomplete.

(a) On page 102, first complete paragraph, the DEIR states that water levels in Laguna Salada, Horse Stable Pond, and the connecting channel between them, would be temporarily lowered to allow equipment to access the shoreline, and surveys would then be performed and any observed CRLF or SFGS would be relocated. This discussion should be expanded to (1) note that the capture and relocation of CRLF or SFGS may only be performed by a qualified biologist who possesses appropriate permits from the U.S. Fish and Wildlife Service and the California Department of Fish and Game, and (2) require that as part of this pre-construction process a silt fence will be installed and maintained in a manner that would prevent CRLF or SFGS from re-entering the construction zones.

(10) A description of project timing and phasing must be added.

(a) Page 103 infers that the Restoration project would be implemented over multiple seasons (which would run from May 1 to October 15). However, the DEIR does not state how many such seasons will be required to complete the project, or what construction activities will occur in each phase, or how such construction will affect golf operations during those phases. May 1 to October 15 is the prime season for golf operations, so the City must develop

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and include in the DEIR a detailed plan for how to minimize impacts to golf operations during each phase of the Restoration project implementation.

14

(11) The description of the permitting process for implementation of the Sharp Park Restoration project needs to be corrected.

(a) Page 293 seeks to describe the state and federal permitting processes which would have to be completed prior to implementing the Restoration project. That description is inaccurate, and needs to be corrected as follows: (1) the City would not itself "consult" with the USFWS to obtain a Biological Opinion and associated Incidental Take Statement, rather such formal consultation under Section 7 of the Endangered Species Act would be performed by another federal agency, in this case the U.S. Army Corps of Engineers (although the City, as the applicant for the Corps permit, may participate in that consultation between the two federal agencies); (2) a "consistency determination" under the Fish and Game Code would not be required by the CRLF since that species is not listed as threatened or endangered under the California Endangered Species Act, and hence no take authorization from DFG is required; (3) a consistency determination for the SFGS is not available, as the SFGS is a "fully protected" species under the Fish and Game Code and DFG does not have the authority to authorize the incidental take of fully protected species; and (4) a state take permit for the western pond turtle is not required because this species is not listed as threatened or endangered under CESA.

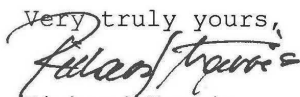
15

(12) The DEIR should note that the Restoration project "recovery action" is a voluntary and discretionary action.

The DEIR correctly notes on pages 98, 293, 326, and elsewhere that the Sharp Park Restoration plan is a "recovery action", the purpose of which is to provide higher quality habitat for the SFGS and the CRLF. The FEIR should supplement this description by noting that the Restoration project is a completely voluntary and discretionary action by the City, and one that is consistent with the species recovery objectives of both the federal Endangered Species Act and the California Endangered Species Act but is not required by either the FESA or CESA.

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We look forward to continuing a cooperative and laborative relationship with the Planning Department and Recreation & Park Department as this project moves ward.

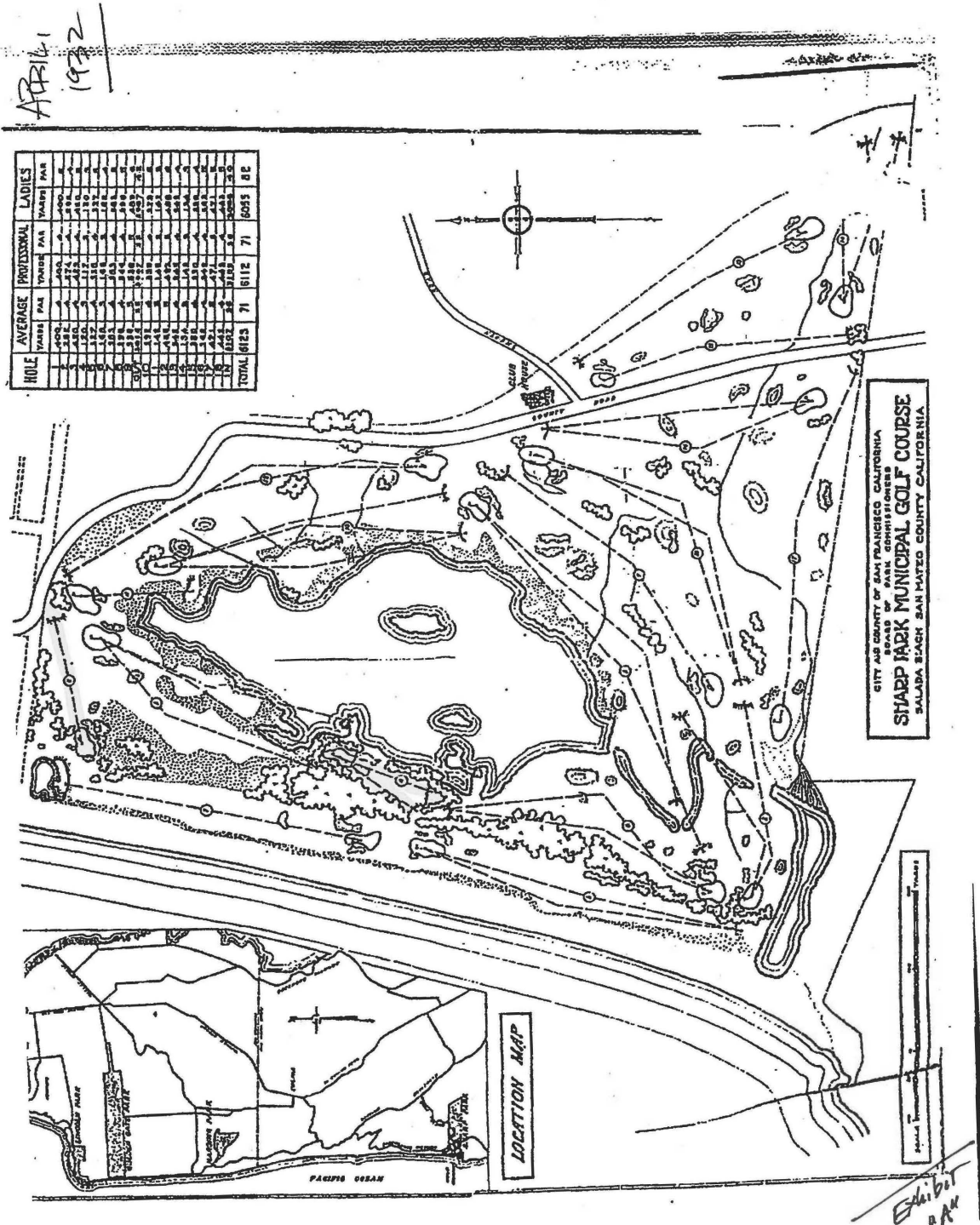
Very truly yours,


Richard Harris
San Francisco Public Golf Alliance

ls.

City of Pacifica, Mary Ann Nihart, Mayor
San Mateo County Board of Supervisors,
Carole Groom, President
David Holland, Assistant County Manager,
San Mateo County
Stephen Rhodes, Pacifica City Manager
Phil Ginsburg, General Manager,
San Francisco Recreation & Park Department
Mark Buell, President, Recreation & Park Commission
Dawn Kamalanathan
Lisa Wayne

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Conceptual Alternative A18

Sharp Park Conceptual Restoration Plan
Pacifica, CA

Figure 14



Fairways	Raise to 10' Contour	Coastal Shrub/Grassland	Open Water
Fence	Upland Mounds for SFGS Habitat	New Wetlands	Convert to Golf Holes
Habitat Boundary	Remove Non-Native Trees	Shallow Water Habitat	

Q:\Projects\LagunaSalada\GIS\Figure14_ConceptualAlternativeA18.mxd

San Francisco Call-Bulletin, March (?), 1932

TEETOPICS

By FRANK
P. NOONHere's What You'll Find at Sharps Park
Fleming Describes City's Newest Layout

With the opening of the Sharps Park course set for April 1, a lot of faraway folks want to know what the "going" is like between the net tee and the eighteenth green.

Playing the layout the other afternoon with Dr. Alister Mackenzie, a designer, Bob Hunter Jr., who played a prominent part in the construction of the course, and Jimmy McGee, the writer agrees with Jack Fleming, the superintendent, of the course, that he has had one whale of a time trying to grow grass on the acreage circling Laguna Salada.

The soil itself is not good, and innumerable top dressings have not benefited it much. There is sufficient water available, but until a reservoir is constructed in the canyon east of the course to guarantee an adequate supply of fresh water, I am inclined to the belief that growing grass will remain a problem to Fleming.

Water now used on the course is pumped from a reservoir near the beach, and, naturally, contains salt. The result is that the grass isn't growing as it should, and the course at present presents a "placid" appearance. The greens are excellent.

You want to know about the course, don't you? Well, here is a description of the layout as written by Jack Fleming. You will be interested, I know, in knowing that Fleming is rated by none other than Dr. Mackenzie as one of the most expert greenkeepers in the country.

Here is Fleming's hole by hole description of the course:

FIRST NINE

No. 1—400 yards, par 4. A fairly long two shot hole, slightly dog legged. No particular difficulties to a straight hitter.

No. 2—582 yards, par 4. A short two shoter. Drive must clear an arm of lake at about 100 yards, but a wide fairway available. At 170 yards out, greens set back against trees and trapped in front right.

No. 3—483 yards, par 4. One of the ocean holes constructed on the beach—in a slight depression bounded by sand and sand grass embankment on left, trees on right. Entrance to green slightly advantage from left on account of trap.

No. 4—430 yards, par 3. A one shoter. Green very large, but well trapped in front and right, trees on left, 1830 feet.

No. 5—421 yards, par 4. A lake-side hole and one of the most interesting shots on the course, similar to Dr. Mackenzie's "ideal golf hole." Three trees, four routes.

Easy route probably will cost at least one extra stroke to get on, while the other combinations of two and routes give rewards proportionate to their respective risks.

No. 6—410 yards, par 3. A difficult shot. Green well trapped.

No. 7—433 yards, par 4. Similar to No. 2, but in opposite direction. A trap endangers the short player on his second, but properly played as a two shot hole a par is possible.

No. 8—397 yards, par 4. A dog-leg, quite difficult for two shots. Drive is blind and over trees if played close to get in opening for second. Plenty of fairway, however, for those who play short, and do not care to risk trees on right for possible par. The wide fairway practically requires three strokes to get on.

No. 9—438 yards, par 4. A lake-side hole with wide sandy beach on water side. Back tee should be used by all, as water carry is very short and close to tee. Requires three good shots to get on if dog-leg is played, but possibly a very long sure upon and get in under par.

SECOND NINE

No. 10—382 yards, par 4. One of the best holes, two tees, four possible routes, sand and water carries optional. The ideal shot is an accurately placed ball on both first and second holes. If well placed on first, the green opens well for a pitch and run second. All other approaches to the green are guarded.

No. 11—442 yards, par 4. A fairway's short hole. Water and sand carry, trap green. Green, however, is long and should receive an average straight ball easily.

No. 12—468 yards, par 4. Fairway flat, double dogleg. Not difficult except to get two good, straight drives in succession.

No. 13—461 yards, par 4. Favoring the clubbies from No. 12 green to No. 13 tee. The thirteenth, fourteenth and fifteenth are all holes of a different type than the lake-side and ocean side holes. No. 13 is an optional type of hole of average difficulty. The green is well trapped.

No. 14—414 yards, par 3. This short hole has two tees. Two tees with the carry across the creek opens into green easily, while on crossing creek to the other tee a more difficult shot over a trap at the green is encountered. Directly into prevailing wind.

No. 15—430 yards, par 4. Similar to No. 12. At present, along the edge of the county road, which it is planned to re-locate. No. 15 green is near clubhouse.

No. 16—453 yards, par 4. A nice hole with two optional routes and a creek to cross.

No. 17—471 yards, par 5. A long hole down the south property line. The green is on a 15 foot fill.

No. 18—443 yards, par 4. The finishing hole is long and narrow, as if not successfully played on both long shot, but the green is wide, open and nicely rolling in order to lend interest to the many thrilling final decisions which will no doubt be made on it. A clump of trees guards the green on the left.

SFSPCA-1



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JACQUELINE L. YOUNG

October 24, 2011

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

Dear Mr. Wycko:

I am writing on behalf of the San Francisco SPCA, in response to the San Francisco Planning Department's intent to decrease and possibly eliminate off-leash dog areas in San Francisco. The SF SPCA strongly supports sharing park lands for off-leash play areas throughout the city, including those in city parks.

There are over 150,000 dogs in San Francisco, and many of them utilize the off-leash play areas in city parks to get both the socialization and exercise they need to be happy and healthy. Providing areas for San Francisco dogs to socialize makes the city safer for both canines and humans alike. The confidence and social experience dogs gain from off-leash play allows them to be more comfortable interacting with unknown people and animals-important qualities for living in a crowded urban environment.

There are more dogs than children in San Francisco but this isn't about animals versus people. Many residents consider their dogs to be a part of their family-this is about recognizing the importance of dogs in our well being. City parks are intended for the entire community to enjoy, and as such it is vital that we share these public spaces. While we respect the need to balance the maintenance and ecological needs of the parks, decreasing or eliminating off-leash play areas is not fair to the responsible residents who choose to bring their dogs with them to public parks, and doing so would greatly decrease their quality of life.

Other park visitors also benefit from the presence of dogs and their guardians. Increasing the number of visitors makes parks safer in general by discouraging the illegal and seedy behavior that sometimes occurs in desolate areas. Dog owners are typically the first to visit the parks in the morning and often report health hazards or problems to local authorities, which results in safer parks for those who visit later in the day.

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SFSPCA-1

Off-leash play areas also benefit the health of San Franciscans by encouraging them to spend their free time in parks, being physically active and socializing with other dog guardians. This, in turn, promotes public health and increases the quality of life in our city, in addition to strengthening communities by providing a space where neighbors can meet and interact.

San Francisco prides itself on being one of the most humane cities in the nation. The significant negative impact that eliminating off-leash play areas would have on the wellbeing of dogs is in direct contrast to the animal-friendly reputation that San Francisco has built. These actions would also fail to acknowledge the value of animal companionship, which has been proven to decrease anxiety, stress, and provide numerous physical and psychological health benefits. We need to sustain a community that attends to the wellbeing of its animals and insists on humane conditions.

Dogs are not the enemy, nor are their guardians. Dog owners and their 150,000 companions are a part of our diverse city, and as such we need to respect and acknowledge their interests. Maintaining the current off-leash areas in city parks not only benefits San Francisco's dogs and their guardians, but also promotes community, public health, safety, the human-animal bond, and San Francisco's reputation for being an open, welcoming, animal-friendly city.

Sincerely,



Jennifer Scarlett, DVM
Co-President
San Francisco SPCA

SFT-1



October 31, 2011

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

RE: SIGNIFICANT NATURAL RESOURCE AREAS MANAGEMENT PLAN (SNRAMP)
DEIR

Dear Mr. Wycko:

On behalf of San Francisco Tomorrow, we appreciate the opportunity to comment on the above-referenced and long-delayed document. In general, we find the goals and objectives to be appropriate and the analysis of the environmental impact adequate, with one grave exception.

The document could be improved as noted:

- 01 [➤ The Preferred Project should fully address the long-term sustainable management and control of invasive plants due to the retention of weed-nurturing eucalyptus groves in the MA-3 areas.
- 02 [➤ Community Stewardship should be included as a recreational use. The hundreds of volunteers who regularly tend the City's significant natural areas not only provide a significant resource to the Recreation and Parks Department, they are receiving a recreational benefit that should be recognized and quantified in this document, which designation perpetuates a fragmented approach to natural resources management.
- 03 [➤ The identification of the recreation and maintenance alternatives as the "environmentally superior alternatives" rather than either the proposed project or the recreation project, is inappropriate, as it discounts the value of biodiversity as an environmental benefit.
- 04 [➤ The maximum restoration alternative is inadequately described, and so cannot be properly evaluated as a potential environmentally superior alternative.
- 05 [We have a real concern that the inclusion of Sharp Park, which is located in San Mateo

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San Francisco Tomorrow

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05

County is inappropriate and should be excluded from the project description and analysis. It is not one of *San Francisco's* Significant Natural Resource Areas. Further, it is embroiled in a number of issues that could delay the certification of this document and the implementation of the program

I urge you to sever Sharp Park from the DEIR document so that the program may move forward in a timely and appropriate fashion.

Thank you for considering our comments.

Sincerely,

Jennifer Clary
President

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p.1



San Francisco Tree Council

October 3, 2011

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

RE: Public Comment on Draft Environmental Impact Report for Natural Areas Program

Dear Mr. Wycko:

As the former Executive Director of the San Francisco Tree Council and founding member of the San Francisco Urban Forest Council, I learned a great deal about the trees of San Francisco. Based on that direct observation and experience with the urban forest, I am writing to make the following observations about the Draft Environmental Impact Report (DEIR) for the Natural Areas Program.

- 01 {
1. The DEIR claims that every non-native tree that will be destroyed by the Natural Areas Program will be replaced "one-for-one" by a native tree somewhere within the natural areas. This is quite simply not true because:
 - There were few native trees in San Francisco prior to its settlement because native trees are not adapted to San Francisco's climate and soil conditions.
 - Native trees will not grow in most of the natural areas because of the microclimate in those locations.
 - The Natural Areas Program has already destroyed hundreds of trees few of which were replaced by native trees. In the few instances in which native trees were planted by the Natural Areas Program, they rarely survived.
 - The stated goal of the Natural Areas Program is to return San Francisco to grassland and scrub, which is the native habitat, with the exception of a few small patches of oak woodland in protected areas with sufficient water drainage to keep them alive.
- 02 {
2. The DEIR claims that only dead, dying, hazardous trees will be removed. This claim is also not true because:
 - None of the hundreds of trees that have already been destroyed by the Natural Areas Program were dead, dying, hazardous trees.
 - Most of the trees that will be destroyed by the Natural Areas Program are Blue Gum eucalyptus. The Blue Gum eucalypts of San Francisco are young and healthy. Based on their lifespan in Australia, they should continue to be healthy in San Francisco for about 200 more years.

Please revise the Draft Environmental Impact Report to reflect these facts. If thousands of trees will be destroyed in San Francisco, at the very least the people of San Francisco should not be led to believe that it is either necessary or that it will be mitigated by "replacement" trees.

Thank you for your consideration.

Sincerely yours,

Carolyn Blair

Past Founder, San Francisco Tree Council
 Founding Member SF Urban Forest Council
 2310 Powell Street, #305
 San Francisco, CA 94133

415 982 8793

Sierra Club-1



San Francisco Bay Chapter

Serving Alameda, Contra Costa, Marin and San Francisco Counties

October 31, 2001

Bill Wycko,
Environmental Review Officer,
SF Planning Department
1650 Mission St. Suite #400
San Francisco, CA 94103
Email Bill.Wycko@sfgov.org

RE: SIGNIFICANT NATURAL RESOURCE AREAS MANAGEMENT PLAN
(SNRAMP) DEIR

Dear Mr. Wycko:

Thank you for the opportunity to comment on the SNRAMP DEIR. With respect to the document's treatment of the plan on the programmatic level for the 22 natural areas in San Francisco proper, we find the DEIR to be, in general, adequate, accurate, and complete. Some comments on the report's treatment of alternatives are included in the attached.

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Our main objection to the DEIR, as it is currently structured, is its treatment of restoration proposals for Laguna Salada in Sharp Park. We are submitting (under separate cover) as part of our comments the report, *CONCEPTUAL ECOSYSTEM RESTORATION PLAN AND FEASIBILITY ASSESSMENT LAGUNA SALADA, PACIFICA, CALIFORNIA*, Prepared by: ESA PWA with Peter Baye, Ph.D. and Dawn Reis Ecological Studies, which contains a substantive critique of the Sharp Park Laguna Salada project as presented in the SNRAMP. We believe the DEIR analysis and alternatives presented for the Laguna Salada project are flawed and inadequate.

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Our main request at this juncture is procedural: we ask that as the planning and environmental review process moves forward, that the portions of the Significant Natural Resource Areas Management Plan and the environmental review documents that pertain to Sharp Park and Laguna Salada be severed from the rest of SNRAMP planning process and the SNRAMP DEIR. Instead, the Sharp Park and Laguna Salada project should be placed on a separate planning and environmental review track. The reasons for this are numerous and are discussed in the following comments.

Thank you for your consideration of this matter,

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Sierra Club comments
SNRAMP DEIR, Oct. 31.2011

page 2

Arthur Feinstein, Conservation Chair
San Francisco Group, Sierra Club
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Sierra Club Comments on the SNRAMP DEIR

A. General Comments Relating to the San Francisco portions of the Report.

1. The San Francisco portion of the report is thorough, accurate, and adequate.

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In its treatment of the 22 natural areas located in San Francisco, the report does an admirable job analyzing the environmental impacts of the Proposed Project, as well as alternatives. In general, the portions of DEIR analyzing the programmatic portions of the plan and routine maintenance are thorough, accurate, and adequate.

2. Alternative analysis needs to be corrected and refined.

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In the analysis of alternatives—as has already been pointed out by RPD staff—there is a discrepancy between the introductory summary and the analysis at the end of the report. While this will need to be corrected, the instrumental matrix used to analyze and quantify environmental impacts is methodologically flawed because it accords all impacts to be equal. Thus recreational resources and historical resources are treated the same as biological resources in terms of impacts and mitigations. This is contrary to the legislative intent of CEQA, which places emphasis not so much on incidental impacts but on the preservation of a healthy environment. Especially as the DEIR has already generated much confusion in its analysis of alternatives, it would be useful to include some language explicating the methodology used to determine what constitutes an “environmentally superior” alternative. In addition, some analysis of the alternatives according to which would better accomplish the project’s goals and objectives, in this case biological resource protection, would give decision-makers a more accurate assessment of which alternative is preferable from a certification standpoint. In

Sierra Club-1

Sierra Club comments
SNRAMP DEIR, Oct. 31.2011

page 3

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(Cont.)

particular, it is clear from the analysis that the maximum restoration alternative is, with respect to the project's major goals and purpose, at least the "ecologically superior" alternative. It is also clear that, with the exception of Sharp Park, the over-all impacts of the maximum restoration alternative are only slightly greater than those of the proposed project, while in many instances significantly furthering the plan's overall objectives. However, this is not all clear in the accompanying analysis, which presents a rather confusing quantification of impacts and mitigations across a broad spectrum of categories. We ask therefore that the final EIR contain language clarifying the purpose and methodology of the alternatives analysis, lest the conclusions be misunderstood, as well as straight-forward language assessing which alternative is superior in terms of natural resource protection.

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3. Adaptive Management

We applaud the Report's endorsement of Adaptive Management as representing current best practice in natural resource management.

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4. Specific Recommendations

In general, with the exception of Sharp Park, we find the specific recommendations offered for each of the 22 Natural Areas in San Francisco to be very sound and consistent with best management practices and science, and recommend that they be adopted as part of the plan.

07

5. Monitoring

We endorse the Report's recommendations to establish a robust monitoring program for each of the City's natural areas.

B. Comments on the project-level analysis for Sharp Park

1. Insufficient Scope of proposed Project

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(Cont.)

A major flaw of the Report's project-level analysis for the proposed Laguna Salada restoration is the insufficient scope of the project, which renders the project incapable of achieving its stated objectives, particularly with regard to provision of adequate habitat for the San Francisco Garter Snake (SFGS). In scoping comments and in the *ad hoc* alternative analysis performed by consultants earlier, the Sierra Club and other environmental organizations have consistently argued that a full range of alternatives, including a maximum restoration alternative (no golf), needs to be considered to give decision-makers the information necessary to determine which alternative best meets the

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Sierra Club comments
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page 4

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(Cont.)

project's objectives. By restricting the scope of the project exclusively to options which include an 18-link golf course, the analysis greatly compromises the project's ability to meet its goals. Indeed, the Report tacitly admits as much, as the proposed maximum restoration alternative goes beyond the original plan by including more acreage for upland habitat, in addition to re-constructed golf links.

2. Confusion of Project goals and objectives.

08

The primary objective of the Management Plan, for the Sharp Park natural area, as for the other areas, is the protection of biological resources. However, in its analysis, the DEIR defines the project as that of protecting biological resources *while maintaining an 18 link golf course*. The Report goes beyond its purview when it proposes to reconstruct the golf course outside of the designated natural area as the appropriate mitigation for impacts on existing course. There is considerable confusion within the document as to whether the plan is really a plan for the restoration of the Laguna Salada or a plan to reconstruct the 18 link golf course. Moreover, while the Plan envisions reconstructing the affected link elsewhere, there are no details as to exact location or environmental analysis of the impacts of such reconstruction in the Report. Our concern is that what started off as a project related to natural resource protection in the midst of a golf course has morphed into a plan to reconstruct the golf course in the midst of sensitive habitat. The goals and objectives of the project need to be clarified, and the portions of the project related to reconstructing the golf course should either be removed from the DEIR, or the scope of the project needs to be broadened to include both elements.

3. Inappropriate designation of golf course as a Significant Historical Resource.

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We recognize that while the Sharp Park golf course is not represented in either the Federal Register or the State Historic Resources Inventory, CEQA gives discretionary authority to the Lead Agency to treat locally significant historical structures or landscapes as an historical resource for CEQA purposes. However, the key term here is "discretion." In general, only those resources which are eligible for listing under the State Historic Register are permitted to be treated as such for CEQA purposes (California Public Resources Code; Sections 5020 - 5029.5). Here is the relevant section of the Code pertaining to eligibility requirements for listing on the State Inventory:

Chapter 11.5. California Register of Historical Resources **Section 4852. Types of Historical Resources and Criteria for Listing**

The criteria for listing historical resources in the California Register are consistent with those developed by the National Park Service for listing historical resources in the National Register, but have been modified for state use in order to include a range of historical resources which better reflect the history of California. Only resources which meet the criteria as set out below may be listed in or formally determined eligible for listing in the California Register.

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Sierra Club comments
SNRAMP DEIR, Oct. 31.2011

page 5

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Among the criteria which are used to determine whether a resource can be deemed historically significant is “integrity,” defined in subsection (c):

(c) Integrity. Integrity is the authenticity of an historical resource’s physical identity evidenced by the survival of characteristics that existed during the resource’s period of significance. Historical resources eligible for listing in the California Register must meet one of the criteria of significance described in Section 4852(b) of this chapter and retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. Historical resources that have been rehabilitated or restored may be evaluated for listing. Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association.

Extrapolating from these criteria and general CEQA practice regarding historical resources, it is hard to see how the golf course can be considered an historical resource because it lacks integrity, having been altered many times in the past through both natural and human interventions. Indeed, the proposed project will alter the course even more by relocating and shortening additional holes. What the report is saying, in effect, is that the general concept of an 18 link golf course is a significant historical resource, a designation which in our view is improper.

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4. “Piecemeal” Planning Process for Sharp Park.

It can reasonably be inferred from the DEIR that the project, as currently envisioned, involves, in addition to the Laguna Salada restoration, both the reconstruction of the golf course and reconstruction/fortification of the seawall. However, these elements of the project, as well as the analysis of the recycled water component to provide irrigation for the golf course, are all treated as independent “projects” for CEQA purposes. Especially as the proposed project in this DEIR will result in the radical transformation of the hydrology of Laguna Salada into a below sea-level frog pond, it is improper to treat these items separately, as is currently the case.

11

5. Further analysis is necessary to ensure that the Laguna Salada restoration proposals are aligned with the ongoing efforts of the San Francisco Garter Snake Recovery Plan.

A major objective of the project is to provide habitat for the San Francisco Garter Snake, a federally listed species. In addition to ESA concerns, protection of endangered species is a priority per CEQA law as well. For instance, CEQA § 21001 (c), Additional Legislative Intent, states: “The Legislature further finds and declares that it is the policy of the state to: (...) Prevent the elimination of fish or wildlife species due to man’s activities, insure that fish and wildlife populations do not drop below self-perpetuating levels, and preserve for future generations representations of all plant and animal communities (...).” Thus a key element in any analysis is showing how these proposals

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tie in with the larger goals of the SFGS Recovery Plan. We also note that the Recovery Plan is currently undergoing revision. As stated in a recent report, there has been significant evolution in biological opinion since the Recovery Plan was first issued:

Since the initial recovery plan was published, wildlife managers have learned that the snake's upland habitat may be essential to its survival. On-going urbanization, combined with an increase in intensive agricultural operations, has contributed to the rapid loss and fragmentation of the snake's habitat and their primary prey species. The acquisition, restoration, and preservation of suitable habitat will be essential to this species' survival. (Source: National Park Service San Francisco Bay Area Network Resource Briefing, July 2010; Paul Johnson, biologist.)

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(Cont.)

Efforts should be made to analyze how the plan aligns with the most up-to-date recovery efforts, including recent research on population trends, demography, and genetics. Given the latest science on the importance of gene flow, and given the extremely vulnerable status of the species (some estimates place the total population at less than 2000 individuals), it is not enough to show that the plan provides the conditions of possibility for the survival of a subpopulation of 200 snakes. Rather, recent science shows that what is necessary is not only the provision of habitat but "ecological corridors" allowing connectivity between the isolated subpopulations. While the proposal to create an island of snake habitat in the middle of Laguna Salada may have merit, the approach may not be sufficient to satisfy the overall ecological requirements for a viable and self-sustaining snake population.

6. Dredging proposals need further study.

A major component of the proposed project is to dredge Laguna Salada and Horse Stable Pond to create open water habitat for the red-legged frogs (RLF's). We are concerned that dredging the may actually harm existing frog and snake habitat. We are also concerned about possible contamination in the sediments, especially given the presence of the Rifle Range upstream. Further analysis, as well as characterization of core samples, is needed to determine whether the proposed approach is the right one.

12

7. Climate Change and Sea-Level Rise need to be taken into consideration.

Especially as the project is proposing major alternations to the hydrology of Laguna Salada, we believe more analysis is required to take into account the cumulative effects of global warming and sea-level rise. The proposed project seems to presume indefinite perpetuation of existing and past conditions. More precisely, the project seeks to maintain, through stabilization of the pumping regime, an artificial and below sea-level elevation of the Laguna Salada, corresponding approximately to what was the sea-level at the time of the original golf course construction in 1932. Further analysis of such an approach is needed in light of recent data on climate change and projected sea-level rise. At the very least, the Report should study the probable effects of overtopping in 10, 20,

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and 50 year storm events. Our main concern, in light of the reality of climate change, is that the current restoration plan will lack any resiliency in the face of increased climate stress and inevitable sea-level rise. As indicated in the ESA report, a restoration plan which would allow the Laguna Salada wetland complex a buffer zone to retreat upland in the face of sea level rise has a better chance of succeeding in the long term than the current proposal, which will render the site extremely vulnerable to salt-water intrusion and overtopping, with potentially catastrophic consequences for the species.

C. Planning Rationale for Severing Sharp Park from the rest of the DEIR.

I. CEQA Process

As the portions of the Report relating to the programmatic analysis of the Plan and routine maintenance are thorough and complete, and unrelated in any underlying environmental way to the flawed project-level analysis for Sharp Park, we request that the SNRAMP DEIR be recirculated with the Sharp Park component of the DEIR deleted from that document for the reasons listed above. The San Francisco portion of the recirculated SNRAMP could then move expeditiously to the certification of a final EIR.

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We do not believe this would constitute “piecemealing” as it can be reasonably demonstrated that these are already two separate projects. Indeed, a major reason for separating these projects, approving the programmatic elements, and enlarging the scope of the Sharp Park project to include the whole park rather than the designated 5- acre natural area is precisely to avoid “piecemealing” with respect to the various elements proposed for the Sharp Park golf course reconstruction.

2. Background

It is understood that the planning work for restoration of Laguna Salada began as an integral part of the City’s Significant Natural Resource Areas Management Plan, and has thus far been treated as part of that plan for environmental review purposes. However, now that an initial phase of analysis has been done, we believe they reveal compelling planning reasons to separate the Sharp Park/Laguna Salada restoration proposals from the rest of the SNRAMP DEIR. Reasons for severing these two tracks includes the fact that Sharp Park is only included in the SF SNRAMP EIR due to historical contingencies, that there is little intrinsic relation between the portions of the SNRAMP dealing with Sharp and the rest of the plan, that Sharp Park is located in a separate geographical area and political jurisdiction, and that these two parts of the overall “project” are already separated within the existing DEIR as a division between programmatic and project levels of analysis.

Tank Hill Neighbors-1

October 18, 2011

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

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OCT 31 2011

CITY & COUNTY OF S.F.
 PLANNING DEPARTMENT
 M E A

RE: Draft Environmental Impact Report for the Natural Areas Resource Management Plan

Dear Mr. Wycko:

We are neighbors of two "natural areas" at either end of our street (Belgrave): Tank Hill and the Interior Greenbelt. Our opinion of the Natural Areas Program and the associated Environmental Impact Report is based on our personal experience and direct observation of those two natural areas.

About 25 trees on Tank Hill were destroyed over a period of 6 to 10 years by staff of the Natural Areas Program (NAP) and/or volunteer supporters of NAP. Those trees were young and healthy, with trunks varying in diameter of 6" to 24".

We weren't happy about the destruction of those trees and we appealed to the Recreation and Park Department to stop cutting the trees down. In a meeting with the General Manager at that time, Elizabeth Goldstein, an agreement was reached that would save the roughly 30 to 40 trees that remain until an equal number of native trees reached maturity to replace them.

The Recreation and Park Department supplied about two dozen oak trees that were approximately 12" to 30" tall with trunks of about 1" in diameter. The neighbors planted those trees. Five of those trees have survived so far. Only one seems to have achieved any real security and growth since it was planted.

The trees that remain have been severely pruned to reduce the shade they cast on the ground. Occasionally they are further mutilated. We have complained to the Executive Director of the Natural Areas Program about the damage being done to the trees that remain. She has assured us that the staff of the Natural Areas Program no longer works on Tank Hill. Therefore, we assume that this damage is inflicted by a volunteer who continues to work on Tank Hill, apparently unsupervised.

We have also recently (2010) witnessed the destruction of many healthy, young trees in the Interior Greenbelt when a trail was developed there under the auspices of the Natural Areas Program.

Based on these experiences, we are submitting the following comments on the Draft Environmental Impact Report (DEIR):

- 01 { 1. The DEIR claims that only dead, dying, diseased, trees will be destroyed by the implementation of the management plan (SNRAMP). This claim is not consistent with our experience with the actions of NAP or with the written management plan.
- 02 { 2. The DEIR claims that every tree that is destroyed will be replaced with a native tree. We do not believe, based on our experience, that it will be physically possible to replace every tree with a native tree because native trees will not grow in most places in San Francisco. Our experience with "replacement trees," makes us question that NAP has the resources to implement such a commitment, even if the native trees would grow.

Tank Hill Neighbors-1

Page 2

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- 03 { 3. We are opposed to the Maximum Restoration Alternative. The Natural Areas Program does not seem to have sufficient staff to take care of the existing natural areas. Furthermore, they are not supervising the volunteers who are sometimes engaging in what amounts to vandalism in the natural areas. It is not realistic to expect the Natural Areas Program to expand their active restoration efforts into the MA-3 areas. Given the severe economic constraints on public funding, it is not feasible, nor would it be beneficial, to expand the staff of the Natural Areas Program.
- 04 { 4. We support the Maintenance Alternative because it will do the least damage to the environment. Fewer trees will be destroyed and less pesticide will be needed to destroy more non-native plants and trees. The native wild flowers on Tank Hill are thriving in the company of non-native trees. We would be happy to have more native plants on Tank Hill, but we do not believe that it is necessary to destroy trees for that purpose.

Thank you for your consideration.

The neighbors of Tank Hill, San Francisco

Names: Paul R. Rutter 190 BELGRAVE AVE.
 Elizabeth W. Rutter 190 Belgrave Ave. SF
 Alicia Snow 1586 Shrader St. S.F.
 Donna Goodman 442 Mangles Ave, SF 94127
 Terry Craig 442 Mangles Ave. SF 94127
 Lucy Hornum 169 Beulah SF 94117
 Lisa Gartner 99 St German SF 94114
 Patrice GATIER 99 St German SF 94114
 Betty Singer 177 Belgrave Ave. SF 94117
 Morley Singer 177 Belgrave Ave 94117
 Paul Carthman 2 Belgrave Ave 94117
 Zende Fildner " " " "
 Ch. Hill 1585 Shrader St., SF 94117
 Sh. Cap " " "

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October 31, 2011

Bill Wycko
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SENT VIA ELECTRONIC MAIL

**RE: COMMENTS ON THE SIGNIFICANT NATURAL RESOURCE AREAS MANAGEMENT PLAN
DRAFT ENVIRONMENTAL IMPACT REPORT (Case Number 2005.1912E)**

Dear Mr. Wycko & Ms. Range:

On behalf of the Wild Equity Institute, its members, Board of Directors, and staff, I submit these comments on the Significant Natural Resources Areas Management Plan Draft Environmental Impact Report, Case Number 2005.1912E. These comments focus on the DEIR's treatment of Sharp Park natural areas and Sharp Park Golf Course.

The preferred alternative for Sharp Park proposed in the DEIR is substantially different from the proposal approved by the Recreation and Parks Commission for environmental review and the version announced during scoping of this project. These differences have affected the proposed alternative's ability to meet the project's stated goals and purposes; they impact the proper definition of the project setting; they affect the range of alternatives that the City must assess; and they affect the scope of environmental analysis that the City must complete before finalizing the EIR.

Because of these changes, the DEIR provisions addressing Sharp Park are deficient in many respects, and if finalized will be challenged in court—and make it highly probable that the challenge will succeed, resulting in an unnecessary delay in implementing the many other elements of the SNRAMP. These changes cannot be remedied at this time without at least recirculating the DEIR for further environmental review after additional analysis, and likely require a new DEIR for Sharp Park altogether. Therefore, as drafted by the City, the DEIR puts the original elements of the Natural Resource Areas Management Plan in the City's other natural areas in needless jeopardy.

*Brent Plater, Executive Director • P.O. Box 191695 • San Francisco, CA • 94119
O: 415-349-5787 • C: 415-572-6989 • bplater@wildequity.org • <http://wildequity.org>*

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Therefore, the Wild Equity Institute recommends that the City segregate out all Sharp Park elements in the DEIR, conduct additional, legally required environmental review, on these Sharp Park elements, and finalize the remaining portions of the DEIR which have had adequate environmental review. Because of the peculiar mix of program and project elements in the remaining elements of the DEIR—and the project-specific nature of the Sharp Park component of the analysis—this can and should be done by the City without requiring additional processing on the non-Sharp Park portions of the DEIR. If the City proceeds in this manner the remaining elements of the DEIR can move forward while the requisite environmental review is conducted at Sharp Park, all without running afoul of CEQA, ensuring that the remaining elements of the plan can be adopted and implemented by the City as quickly as possible.

These comments rely upon comments previously submitted by me as individual during the scoping period, including all attachments to those comments, and all previous comments are incorporated into these comments by reference.

I. LARGE-SCALE CHANGES IN THE PROPOSED PROJECT FOR SHARP PARK REQUIRE FURTHER CEQA ANALYSIS.

The proposal for Sharp Park has been radically changed as identified in Appendix J. These changes are not consistent with the project goals and purposes of the Natural Areas Program, nor are they blur the essential distinction in the CEQA process between the defined project areas and the environmental/background setting. For both of these reasons, the Sharp Park section should be segregated out from the EIR process and undergo further environmental review.

As stated in the DEIR, The SNRAMP is intended to “guide activities on properties owned or maintained by the SFRPD through its Natural Areas Program. Figure 1 is an overview map of the Natural Areas.” DEIR p. 82. At Sharp Park, the Natural Areas Program “owns or operates” only certain portions of Sharp Park: Laguna Salada, Horse Stable Pond, the connecting channel between these two aquatic features, portions of Sanchez Creek, and the eastern hillside forests. These areas are clearly labeled in Figure 1 of the DEIR, and exclude all areas that are “owned or operated” by SFRPD through its Golf Program. Indeed, as explained in several communications by the SFRPD since 2006, this distinction between Golf Program and Natural Areas Program lands has been an essential element of how the environmental assessment would be conducted—and has been repeatedly used by the Department to oppose considering alternatives for the Sharp Park Natural Area that would provide additional environmental, recreation, and other SNRAMP Project benefits on the site.

Yet every alternative proposed by SFRPD for Sharp Park beside the no-action and maintenance alternatives incorporate golf lands into the project proposal. This is particularly true in the preferred alternative, which defines the “restoration footprint” of the SNRAMP for Sharp Park to include about 1/3 of the golf course links. This creates an inherent, confusing flaw in the DEIR, because it is no longer possible to distinguish between the project proposal and the environmental setting within which the project is proposed to be conducted. SFRPD cannot create a cohesive environmental review document if it is changing the environmental setting and baseline project area along with the project itself. This alone requires further explication and environmental review before the Sharp Park portion of the DEIR is approved.

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The importance of this distinction is highlighted by the purpose and goals of the project, as stated in the DEIR. The DEIR states that the SNRAMP will “provide the framework for the long-term management of the Natural Areas.” DEIR p. 84. Section III.E.2 of the DEIR further describes the specific management categories within the Natural Areas Program jurisdictional areas, defining categories of natural areas that will have different management regimes (MA-1, MA-2, and MA-3). *Id.* But at Sharp Park, the golf course lands that are included within the “restoration footprint” are not considered to be any of these three categories of management units. This is consistent with the original project proposal for Sharp Park, as well as the maps produced during the scoping period, which clearly indicated that no golf links would be part of any management area within the plan.

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These flaws create an incoherent DEIR at the critical first steps at Sharp Park. Without a clearly defined project proposal and environmental setting, none of the procedural elements of a CEQA assessment can be properly conducted. As a consequence, flawed environmental decisionmaking is likely to occur—the opposite of what CEQA is designed to do.

This is apparent in the DEIR’s complete failure to consider full environmental restoration alternatives at Sharp Park for the area’s aquatic lands and features. While on the one hand the DEIR selects as the preferred alternative for Sharp Park a plan that would redesign Sharp Park’s golf links to reduce flooding on the course, the DEIR refused to consider full environmental restoration alternatives at Sharp Park. The problem with the alternatives assessment will be discussed more fully below, but these problems have at their root the City’s failure to create a consistent project area and environmental baseline condition. Therefore, this portion of the EIR cannot simply be remedied by reviewing and adopting or rejecting another alternative during the period between the draft and final EIR: the City must also redefine its project and environmental setting to remedy this problem.

II. NEITHER THE PREFERRED ALTERNATIVE FOR SHARP PARK, NOR ANY OF THE ALTERNATIVES ASSESSED IN THE DEIR, MEET THE GOALS AND OBJECTIVES OF THE PROPOSED PROJECT.

The SNRAMP has precise goals and objectives. These include recreation goals such as providing “opportunities for passive recreation, such as hiking and nature observation, that are compatible with conservation and restoration goals; and [t]o improve and develop a recreation trail system that provides the greatest amount of accessibility while protecting natural resources.” Moreover, the SNRAMP conservation and restoration goals include:

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- 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.

Yet the preferred alternative for Sharp Park fails to meet these goals and objectives, nor does it squarely fit in any other project goal or purpose. Instead, as defined it will maximize *active* recreation that threatens the natural areas at the expense of feasible alternatives that would meet the conservation and recovery goals. This is not consistent with the requirements of CEQA,

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and therefore the preferred alternative is not feasible—because it cannot meet the goals and objectives of the project.

On the other hand, a full restoration alternative as proposed in the ESA/PWA report attached to this comment *would* meet all of these project goals and objectives—and yet it was rejected as infeasible by the Department because it may have impacts on an historic resource. But the City has failed to apply the proper standard to this question (and as described below, its assertion of historical significance at Sharp Park is absolutely in error). Financially feasible alternatives that meet the goals and objectives of the project cannot be eliminated from environmental review and consideration—i.e., excluded from the alternatives assessment process—simply because they may have some unavoidable significant impacts. This is particularly true when those impacts can be mitigated.

Here, it is abundantly clear that the full restoration alternative proposed in the ESA/PWA report and provided to the City many months ago meets the criteria for consideration as an alternative in the DEIR. Moreover, the preferred alternative, also has unmitigatable impacts—and yet these very impacts were used to exclude the full restoration alternative for review. This is inconsistent and not supportable by any standard or substantial evidence. For this reason, the CEQA document is flawed.

III. THE HISTORIC RESOURCE ASSESSMENT FOR SHARP PARK GOLF COURSE IS ERRONEOUS.

As explained in the attachment, the Sharp Park historic resource assessment is fundamentally flawed. The golf course clearly no longer retains integrity—review of the comments submitted by PGA Design (also attached here), by the comments of the Historic Preservation Commission, and by independent analysis, the golf course lacks historic integrity today. See the attached Wild Equity Institute assessment for a link-by-link assessment of the course's integrity.

03

The assessment relies almost entirely for its argument on the position of uncredentialed individuals associated with the San Francisco Public Golf Alliance to support its view. But this view has never been adopted by any public body—including the City of Pacifica, despite the DEIR's assertion to the contrary. In particular, the City of Pacifica has never moved Sharp Park Golf Course onto a list of protected historic sites—only the golf course Club House has been so protected. Indeed, the golf course receives the same protection under Pacifica's general plan historic element as Laguna Salada itself and the surrounding habitat areas. Yet these areas are excluded entirely from the historic resource assessment.

Moreover, the City's assertion that the era in which the golf course was created was somehow significant is unsubstantiated and not adequately documented. There is simply no evidence that there was a "golden era of golf" in San Francisco when the golf course was constructed—indeed, the evidence indicates that golf course demand was on the wane when Sharp Park was constructed. Without additional documentation that the era was significant, there is simply no basis under any criterion to declare Sharp Park Golf Course an historic resource under CEQA, as explained in the attached comments by PGA Design. Absent more information about this era and its relationship to the time period around this period of significance, the City has no basis for declaring Sharp Park Golf Course historic.

WEI-1

Indeed, the scoping document makes this readily apparent. The scoping document states expressly that “Sharp Park has had nine overviews and surveys within and adjacent to it” to discover historic and archeological resources. None of these surveys have ever considered Sharp Park Golf Course an historic resource. In addition the scoping document states that “[n]o historical architectural resources listed in Article 10 or Article 11 of the San Francisco Planning Code are within the architectural [CEQA Area of Potential Effects].” This includes the area at Sharp Park that has a C-APE.

At the same time, the golf course as currently laid out impedes telling the story of truly historic events on the land. Native Americans historic use of the land goes uninterpreted and is made inaccessible by the golf course, and the story of an internment camp at Sharp Park during WWII is completely untold, obscured by the existing land use at Sharp Park. These stories can be told with vibrancy if full restoration is selected by the City—but because of its unlawfully constrained alternatives assessment, this option is not even placed before decision makers for review.

V. THE DEIR PIECEMEALS THE ENVIRONMENTAL ASSESSMENT OF SHARP PARK BY DELAYING ASSESSMENT OF THE FUTURE OF SHARP PARK'S SEA WALL AND IGNORING THE EXISTING ALTERNATIVES' RELATIONSHIP TO A LONG-TERM GOLF COURSE REDESIGN.

The DEIR recognizes that the future Sharp Park's sea wall is subject to considerable uncertainty. As explained in the ESA/PWA report, sea level rise induced by climate change, along with storm surges and erosion, all make it infeasible to retain a sea wall at Sharp Park as it is currently designed. Only two options are available to the City: armoring the sea wall at Sharp Park, or allowing the sea wall to revert over time to a naturally managed coastal system.

Yet while these alternatives are acknowledged in the DEIR, the DEIR expressly delays consideration of these impacts to some unknown point in the future. Specifically, the DEIR states that while these alternatives have been considered by SFRPD, “those options are not proposed as part of the SNRAMP. Thus, they are not addressed in this EIR.” DEIR p. 103. But the DEIR is intended to guide management at Sharp Park for the next 20 years—a timeframe in which meaningful impacts to the sea wall may occur according to the ESA/PWA report, and which if the City fails to address could irreversibly harm the endangered species at Sharp Park, the existing infrastructure at Sharp Park Golf Course, and the surrounding communities. By failing to consider this impact presently, the City is piecemealing the environmental review for its plan at Sharp Park to retain an 18-hole golf course at Sharp Park on a permanent (relevant to the SNRAMP timeline) basis.

The DEIR makes this problem express on p. 527, where it states that full natural restoration alternatives at Sharp Park “have been rejected because they are not compatible with the existing and *planned* 18-hole layout of the historic golf course.” (emphasis added) Yet the planned golf course is not part of the DEIR environmental assessment—this is classic piecemealing of project to avoid cumulative, long-term, or complete environmental analysis of a project proposal. This can only be remedied by segregating out the Sharp Park section of the DEIR and subjecting it to a full and thorough environmental review as required by CEQA.

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VI. THE PREFERRED ALTERNATIVE AT SHARP PARK IS INFEASIBLE BECAUSE PERMITS CANNOT BE OBTAINED TO IMPLEMENT IT WITHOUT JEOPARDIZING THE FINANCIAL FEASIBILITY OF THE PROJECT.

As explained in the attached meeting notes and proposed letter from SFRPD staff, the Fish and Wildlife Service has already reviewed substantially the same plan that is proposed in the preferred alternative for Sharp Park Golf Course. And they have informed San Francisco that in order to implement this plan, it cannot be deemed a “recovery” effort, and so stringent permitting requirements will apply. These will include, among other things, the creation of a capital endowment that will fund the long-term management of Sharp Park’s natural areas. Such an endowment or trust would likely require investments of millions of dollars—making the entire proposal infeasible, or certainly less financially feasible than other alternatives available to the City.

The reason this is so is because the proposed project, particularly in light of reasonable alternatives that were nonetheless rejected by the City, has little to do with the long term restoration of Sharp Park’s special status species or the underlying environmental conditions that were destroyed by Sharp Park Golf Course. Rather, the preferred alternative reduces the probability that those objectives of the SNRAMP will be achieved, sacrificing these goals and objectives for golf course water management objectives. The proposed plan is designed to reduce flooding of Sharp Park Golf Course by dredging areas of Laguna Salada and dumping the spoils on the holes which most regularly are flooded during normal winter rains. Given the overwhelming concerns raised about this proposal by the only peer-reviewed assessment of the dredging plan (i.e., the ESA/PWA report),¹ and its incompatibility with the goals and objectives of the SNRAMP, it is simply a violation of CEQA for the city to continue implementing a proposed project that ultimately meets objectives of other projects not within the environmental assessment presented in the DEIR.

For all of these reasons, the City should segregate out Sharp Park from the DEIR, send it back for further CEQA review, and allow the rest of the SNRAMP DEIR move forward without delay.

Sincerely,



Brent Plater

¹ The SNRAMP DEIR relies on a report from 1992 by PWA to support its dredging plan, and even this 1992 report is based on earlier documents which made assumptions about the historic condition of Sharp Park. But the same firm that wrote the 1992—PWA—re-evaluated the 1992 report in 2011 and released its concerns about that plan in the ESA/PWA report in February of 2011. As explained in the report, nearly two decades of additional information about Sharp Park has led to a reassessment of the historic condition of Sharp Park, and the appropriate mechanism to restore the land while providing for the recovery of the special status species. But the DEIR completely ignores this additional data—despite having it available since February of 2011. Moreover, this information was provided by the report authors to the Sharp Park Working Group even earlier than that. There is simply no excuse for the City to ignore this information.

WEI-2



July 23, 2012

Jessica Range
City and County of San Francisco, Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

RE: California Environmental Quality Act Proceedings for the Significant Natural Resource Areas Management Plan, Case Number 2005.0912E; Request for CEQA Notices (Public Resources Code, §21092.2)

Dear Ms. Range,

01

The Wild Equity Institute and the undersigned San Francisco-based organizations (collectively "Conservation Organizations") request that the San Francisco Planning Department reopen the public comment period for the Draft Environmental Impact Report ("DEIR") of the Significant Natural Resource Areas Management Plan ("SNRAMP"), Case Number 2005.0912E.

As you know, the Conservation Organizations have a substantial interest in San Francisco's natural areas, and have regularly used public comment periods in the past as a means of improving the CEQA process and protecting San Francisco's environment. Most have previously requested that they be notified of all CEQA proceedings pertaining to the City's Natural Areas Program. And most of these organizations had specifically requested an extension of the public comment period on the SNRAMP DEIR—which the Planning Department largely denied.

Yet we recently discovered that the City re-opened the public comment period for the SNRAMP DEIR on or about April 30, 2012, and through June 11, 2012. *Astonishingly, none of the Conservation Organizations were notified of San Francisco's decision to reopen the public comment period.*

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(Cont.)

"Public participation is an essential part of the CEQA process" Cal. Code Regs. tit. 14, § 15201. The City of San Francisco has recognized this, stating that Public participation, both formal and informal, shall be encouraged at all stages of review, and written comments shall be accepted at any time up to the conclusion of the public comment period. The undersigned believe public notice of the reopened comment period was insufficient to properly inform all stakeholders. Perhaps the City's intent was to only give specific interest groups notice that had not commented during the previous comment period, and therefore the Conservation Organizations were not notified. But any opening of a CEQA comment period should be broadly publicized, and at bare minimum, should be publicized to those organizations and individuals who previously commented and requested notice pursuant to § 21092(b)(3) of the California Public Resources Code.

Brent Plater, Executive Director • P.O. Box 191695 • San Francisco, CA • 94119
O: 415-349-5787 • C: 415-572-6989 • bplater@wildequity.org • <http://wildequity.org>

Page 1 of 2

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Therefore we respectfully request the Planning Department reopen the comment period for the Draft EIR for another 4-6 weeks. Please inform us of the dates during which the comment period will be reopened as soon as possible.

§ 21092(b)(3) of the California Public Resources Code requires that "notice [of the public comment period] . . . shall be given to the last known name and address of all organizations and individuals who have previously requested notice." We reiterate our request that the Planning Department provide the Conservation Organizations with notice of all future CEQA proceedings involving Sharp Park and/or Sharp Park Golf Course, and all future CEQA proceedings involving the SNRAMP, the City's Natural Areas, and/or the Natural Areas Program. The requested notices should be mailed to the following address:

Brent Plater
Executive Director
Wild Equity Institute
P.O. Box 191695
San Francisco, CA 94119

Arthur Feinstein
Chair
San Francisco Bay Chapter, Sierra Club
2530 San Pablo Ave. Suite I
Berkeley, CA 94702-2000

Neal Desai
Associate Director
Pacific Region, NPCA
150 Post Street, Suite 310
San Francisco, CA 94108

Sincerely,



Brent Plater
Executive Director
Wild Equity Institute



Arthur Feinstein
Chair
San Francisco Bay Chapter, Sierra Club



Neal Desai
Associate Director, Pacific Region
National Parks Conservation Association

WGF-1

WORLD GOLF

FOUNDATION

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OCT 03 2011

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M.E.BOARD OF
DIRECTORS

September 29, 2011

CITY OF SAN FRANCISCO
PLANNING DEPARTMENT
1650 MISSION ST., #400
SAN FRANCISCO, CA 94103

San Francisco Planning Department
Attn: Bill Wycko, Environmental Review Officer
1650 Mission St., #400
San Francisco, CA 94103

CITY OF SAN FRANCISCO
PLANNING DEPARTMENT
1650 MISSION ST., #400
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PLANNING DEPARTMENT
1650 MISSION ST., #400
SAN FRANCISCO, CA 94103

Re: Supporting "Historical Resource"
Designation for the Sharp Park Golf Course
Significant Natural Resource Areas, etc.
DEIR No. 2005.1912E

Dear San Francisco Planning Department,

01

I am writing to you in support of the preservation of Sharp Park Golf Course as we know it today. Sharp Park Golf Course, designed by Master Architect, Dr. Alister MacKenzie, is an historical property, an important part of San Francisco's history, and should be safeguarded from any significant modifications that will change its architectural integrity.

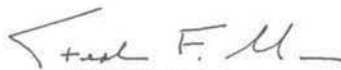
The San Francisco Public Golf Alliance, in a letter to you dated September 20, 2011, comprehensively outlined all of the reasons it supports the determination of the San Francisco Planning Department that the Sharp Park Golf Course is an "historical resource" under the California Environmental Quality Act.

The World Golf Foundation agrees with and supports the contention and conclusion of the San Francisco Public Golf Alliance.

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(Cont.)

Please do not allow the proposed alteration projects to occur. To do so would effectively cause one of America's greatest golf treasures to be irrevocably negatively impacted.

Sincerely,

CITY OF SAN FRANCISCO
PLANNING DEPARTMENT
1650 MISSION ST., #400
SAN FRANCISCO, CA 94103


Stephen F. Mona
Chief Executive Officer

One World Golf Place • St. Augustine, FL 32092 • www.worldgolffoundation.org • 904-940-4000 | Shell Oil Company • Founding Partner

GOLF
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San Francisco Planning Department

September 29, 2011

Page 2

cc: Congresswoman Jackie Speier

Hon. Ed Lee, Mayor, City and County of San Francisco

Hon. Mary Ann Nihart, Mayor, City of Pacifica

David Chiu, President, San Francisco Board of Supervisors

Carole Groom, President, San Mateo County Board of Supervisors

Philip Ginsburg, General Manager, San Francisco Recreation and Park Dept.

Charles Edwin Chase, AIA, President, San Francisco Historic Preservation Commission

San Francisco Public Golf Alliance

WTPCC-1

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JUN 12 2012

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M E A

To: Bill Wycko
Environmental Review Officer
SF Planning Dept

From: West of Twin Peaks Central Council

June 11, 2012

Mr. Wycko,

We submitted a public comment on the Draft Environmental Impact Report for the Natural Areas Management Plan (Planning Dept Case No. 2005.1912E) on Friday, June 8, 2012. We would like to replace that public comment with the one attached to this letter, which includes the previous submission plus an addendum written by a WTPCC Board Member. The attached comment, addressed to the Recreation and Park Commission, including the addendum, constitutes the WTPCC Public Comment on the Draft Environmental Impact Review for the Natural Areas Management Plan.

Thank you.

WTPCC-1



June 4, 2012

West of Twin Peaks Central Council
PO Box 27112
San Francisco, CA 94127

To: San Francisco Recreation and Park Commission

McLaren Lodge
501 Stanyan St
San Francisco, CA 94117

Dear Commissioners,

At its May 21, 2012 meeting, The West of Twin Peaks Central Council (WTPCC) voted to write a letter opposing RPD's Natural Areas Program (NAP) and to submit a comment opposing NAP as part of the NAP DEIR public comment process. WTPCC, formed in 1937, is an umbrella group of 20 neighborhood associations that share the common geographic designation "west of twin peaks." WTPCC member associations share common demographics as well— primarily owner-occupied, single-family homes. Our members choose to live here because it is a medium-density area that provides space for yards and children, as well as local commercial shopping districts, recreation options, and parks. Cumulatively, we have a shared history of protecting and improving the common characteristics and character of our neighborhoods.

WTPCC member organizations had expressed concerns about NAP at previous meetings, especially concerns about NAP's plans to cut 1,600 trees on Mt. Davidson. Prior to its May 2012 meeting, WTPCC member delegates were given "homework," links to the NAP General Management Plan (SNRAMP) section on Mt. Davidson along with the SNRAMP Executive Summary, information on NAP from the NAP website, and information from critics of NAP. At the May meeting, WTPCC heard a presentation in support of NAP from RPD Chief of Operations Dennis Kern and NAP Director Lisa Wayne, and a presentation in opposition to NAP by Eric Miller and Jacquie Procter from the SF Forest Alliance. Judging by the quality of the questions, our delegates had indeed studied the suggested material "assigned" beforehand. After the presentations and questions, WTPCC voted immediately to send this letter and comment.

WTPCC concerns with the Natural Areas Program (NAP) are as follows:

- NAP's plans to cut 18,500 trees in parks controlled by SF RPD, including plans to cut 1,600 trees on Mt. Davidson

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- NAP's use of herbicides, including repeated applications at the same site, poor signage, improper applications, and concerns about children and pets playing in areas where toxic herbicides have been applied
- NAP's plans to close access to areas under its management, including closing 9.2 miles of trails, and turning the park experience into one full of "Stay on the Trails" and "Keep Out" signs
- NAP's plans to remove existing habitat (especially bushes and trees) and replace it with grassland will destroy habitat needed by wildlife and birds currently living in our parks
- NAP has done an extremely poor job of informing people, including park neighbors, of its plans; those plans were created without seeking input from park neighbors and park users
- NAP has expanded far beyond its original mandate to protect and preserve remnants of San Francisco's natural heritage, into large-scale conversion of existing habitat into something completely different, conversions that will change the character and uses of the park for decades to come

Because of these concerns, WTPCC opposes the proposed NAP Management Plan (SNRAMP) currently undergoing environmental review. We ask the Planning Department to address our issues and concerns with the Draft NAP DEIR (details below). We urge the Recreation and Park Commission to rethink its support of NAP's plans. The parks belong to the citizens of San Francisco, not to Natural Areas Program staff.

TREE REMOVALS

02

WTPCC opposes NAP plans to remove healthy trees simply because they are non-native or simply to allow more sunlight to reach newly planted, sun-loving natives on the forest floor. We fully support the removal of hazardous trees in our parks, but NAP's plans go far beyond that.

We are concerned that the actual number of trees removed will be much higher than the 18,500 listed. NAP does not include any trees or saplings less than 15 feet tall in its count of trees to be removed, yet the SNRAMP makes clear that these "smaller" trees or saplings will be cut down along with the taller ones. A 2007 US Forest Service report noted that just over half (51.4%) of the trees in San Francisco are less than six inches in diameter at breast height. This diameter corresponds to a tree less than 15 feet in height. The removal of these smaller trees will significantly amplify the impact of the removal of the taller trees on aesthetics, erosion, and windthrow in natural areas, yet the Draft NAP DEIR did not consider these additional impacts.

WTPCC is concerned that claims in the Draft DEIR that trees cut down will be replaced on a one-to-one basis by native trees are misleading. The SNRAMP makes no promise to replace trees. In particular, the SNRAMP specifically states that the 15,000+ trees removed at Sharp Park will not be replaced since the natural area will be converted to coastal scrub. In addition, there were few native trees in San Francisco before the Europeans settled the area; the climate was too harsh. Native trees do not grow well in the windy, foggy, sandy or rocky soils present in most natural areas. For example, about a decade ago, NAP planted 25 oak trees at Tank Hill to replace 25 trees cut down by NAP. Only 5 of the replacement oak are still alive, and only one of those has grown.

WTPCC-1

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Our concerns about the 1,600 tree removals planned for Mt. Davidson in particular include:

- Increased erosion from the loss of the trees
- Increased water runoff during storms and the potential for damage to park neighbors' property from the water or mudslides
- These concerns were not adequately addressed in the DEIR.

03

WTPCC is also concerned that the DEIR does not adequately address impacts on carbon sequestration and global warming from NAP's plans to cut down 18,500 trees. A 2007 US Forest Service survey of San Francisco's urban forest notes that our trees store 196,000 tons of carbon, adding 5,200 tons of carbon to the storage each year. When a tree is cut down, it releases its stored carbon into the atmosphere (as carbon dioxide) as it decays. California State Law requires the state to reduce greenhouse gas emissions; NAP's plans seem to be at odds with this goal. In addition, grassland does not store as much carbon as forests of trees, and the DEIR does not adequately address the impacts on this of NAP's plans to replace non-native trees with native grasses.

HERBICIDES

04

WTPCC opposes repeated applications of herbicides in natural areas to remove non-native plants. Applications of herbicides in NAP-managed areas have increased by 330% over the last four years (from a total of 26 applications in 2008 to 86 applications in 2011). Applications will continue to rise, since NAP plans to use repeated herbicide applications to kill the roots of the thousands of trees it plans to cut down. The Draft DEIR does not consider impacts from this increase in usage.

05

We are also concerned about inadequate and incorrect signage by NAP when it applies herbicides in natural areas. For example, a recent sign warned that herbicides would be applied "throughout" McLaren Park, with no more specific information on where other than "throughout." People walking in the park had two options – continue to walk in the park and risk exposure to herbicides (since you can't know from the sign exactly where in the park they were applied) or leave the park. This inadequate signage essentially closed access to large areas of McLaren Park for a period of time as people tried to avoid exposure.

06

WTPCC is also concerned that NAP applies herbicides incorrectly, causing needless exposure and risk to people, pets, and wildlife from unnecessary spraying. For example, in December 2011, NAP posted a sign that it planned to spray a mixture of glyphosate and imazapyr to eradicate cape ivy in Glen Canyon. However, the California Invasive Plant Council website says spraying to destroy cape ivy must be done in the late spring, when the plant is "photosynthesizing actively but is past flowering, so the active ingredients [in the herbicide] move down with the sugars that are transported to underground storage organs." The spraying should never have been done in December when it would not be effective. NAP essentially put people, pets, and wildlife at risk of exposure to the herbicide for no reason, and ensured they would have to reapply the same herbicides a second time in the late spring if they want to kill the cape ivy.

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It is not enough to say that NAP herbicide applications are approved as part of the SF Integrated Pest Management Ordinance that governs herbicide use by city agencies and are therefore okay, as the Draft DEIR does. The DEIR should study the application records more closely. There are many cases where NAP usage violated IPM rules. For example, NAP applied imazapyr in 2008 and 2009, two years prior to its approval for use by SF IPM in 2011. NAP "sprayed" Garlon in years prior to 2011, even though SF IPM had approved its use only by "dabbing and injection." NAP sprayed herbicides containing glyphosate near the water at Lake Merced, even though US Fish and Wildlife regulations ban the use of that herbicide (and many others) where there is red-legged frog habitat; Lake Merced is red-legged frog habitat.

PARK ACCESS

07

WTPCC opposes NAP plans to restrict access to parks. NAP plans to close 9.2 miles of trails that thread through its natural areas. At our May meeting, Dennis Kern noted that a citywide survey of what San Franciscans want in their parks identified trails and hiking as the number one need. Yet NAP plans to close nearly a quarter of the total length of trails in natural areas (about 40 miles). This would seem to fly directly in the face of what the public said they want in their parks.

In most natural areas, the only thing you can do is walk on a trail. You cannot leave the trail to explore the area, or follow a butterfly, or try to see the bird you hear tweeting. To control access, NAP builds fences. Indeed, in parks where trails in natural areas have been restored recently, fences have been built on either side of the trail to ensure people cannot leave the trail. Natural areas become places where you can "look but not touch." How can children explore the wonders of nature if they are told repeatedly they must "Stay on the Trail"? This is not what we want for our parks.

When people are restricted to walking only on trails, they lose access to the entire non-trail part of the park. In over half of the parks with a natural area (17 of 31), NAP controls the entire park. That means people have lost access to all but the trails in those parks. In an additional 10 parks, NAP controls over 50% of the land. Put another way, only four of the 31 parks with natural areas have less than 50% of their land controlled by NAP. Access restrictions planned by NAP ("stay on the trail", fences, and closure of trails) mean that entire neighborhoods will lose access to the vast majority of the parkland in their neighborhood parks. The Draft DEIR does not consider the impacts on neighbors and park users of this level of access restriction in the 27 parks where NAP controls more than half the land.

HABITAT AND WILDLIFE

08

WTPCC opposes the destruction of existing habitat needed by the wildlife and birds currently living in the parks. For example, NAP has removed underbrush in Glen Canyon that is used by coyotes to hide from people and dogs, and replaced it with grasslands. Unlike the underbrush, the grasslands provide little "cover" for the coyotes or other wildlife living in the natural area.

09

We are also concerned that some habitat conversion is being done during breeding and nesting season. For example, NAP applied for a "streambed alteration" permit from the California Fish and Game Dept for habitat conversion work to be done near Islais Creek in Glen Canyon. In the application, NAP clearly

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stated: "It is the policy of RPD's Natural Areas Program that no new projects will begin during the breeding season (December to May)." Similar commitments were made in the SNRAMP. However, NAP contractors used chainsaws and herbicides to destroy underbrush habitat in Glen Canyon in March and April, continuing work done sporadically since November 2011. This work took place throughout the breeding/nesting season, despite NAP's legal commitment to CA Fish and Game and in the SNRAMP to not do habitat work during breeding season. When people informed RPD management about this, during a meeting at McLaren Lodge, Lisa Wayne, the head of NAP, said the work was being done during the breeding/nesting season because the grant for the project was set to expire. In other words, NAP's decision on habitat conversion in Glen Canyon appeared to be motivated by financial considerations, not by any concerns about the wildlife and birds living there.

POOR PUBLIC PROCESS

10

WTPCC opposes NAP in part because of the poor job NAP has done to inform park neighbors and neighborhood associations about its plans. Neighbors who live immediately adjacent to Mt. Davidson, for example, have said they were never given any official notice of NAP's plans for the park, especially its plans to cut down 1,600 trees. Established neighborhood associations, including many WTPCC members, have not been contacted by NAP. Many have said they never heard anything about the DEIR. Indeed, the Planning Department offered a tacit acknowledgement of this lack of public outreach when it re-opened public comment on the Draft DEIR last month.

11

NAP did not contact park neighbors and users or neighborhood associations to find out what they wanted in the natural areas in their neighborhood parks when NAP staff were developing their plans. During the plan development process, citywide NAP advocacy groups were contacted for input on what NAP should do in the parks, yet the people who live adjacent to or who regularly use the parks (that is, those who will be most impacted by any NAP restrictions) were ignored. The only input most people had was whatever they could say during a one-minute public comment at a Recreation and Park Commission meeting after the plans were already developed. The parks belong to the people of San Francisco, not to NAP staff. All park neighbors and users (not just those known to support NAP) must be involved in discussions about what to do in natural areas. Without this level of public outreach and engagement, NAP's plans lose support and credibility.

Even when people have explained their concerns to NAP staff, it seems to fall on deaf ears. At a 2002 meeting of the Golden Gate Heights Neighborhood Association (GGHNA), members complained about NAP's removal of iceplant at the neighborhood's Grandview Park. Grandview is the only remaining sand dune in San Francisco (other than at the beaches), but it is completely surrounded by homes, some of which have backyards that abut the park. Over the years, neighbors and park staff had planted iceplant at Grandview because it was the only plant that seemed able to hold the sand in place. When NAP took control of the park, it began to remove the iceplant because it was non-native. At the GGHNA meeting, several park neighbors complained that the iceplant removal had caused sand to drift into and cover their backyards, damaging their property. Lisa Wayne, the head of NAP who had been invited to respond to the neighbors' concerns, responded that NAP had no responsibility for property damage outside park boundaries caused by its removal of erosion-controlling plants. When the SNRAMP was released several

WTPCC-1

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years later, it called for “scattered, open sand” at Grandview Park. Over the years, GGHNA has repeatedly submitted public comments asking NAP to remove the goal of “scattered, open sand” at Grandview, yet it remains in NAP’s plans.

NAP’S EXPANDED MANDATE

01
(Cont.)

WTPCC opposes the expansion of NAP’s mandate beyond the protection and preservation of existing remnants of San Francisco’s natural heritage. The original Management Plan for NAP, written in 1995, was 12 pages long.

Over the years, however, NAP has claimed more and more city parkland, to the point that most of the land under NAP control does not have existing remnant habitat. Rather NAP has claimed land that it wants to change from the existing habitat that currently has few native plants to one that more closely resembles the habitat before Europeans settled in the area. Because of this expansion, the final SNRAMP is 711 pages long.

CONCLUSION

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(Cont.)

WTPCC supports the idea of preserving existing remnants of the historical habitat. We do not support the idea of wholesale habitat conversion that requires cutting down thousands of healthy trees, extensive and repeated applications of herbicides, closure of access to large areas of our parks, and destruction of existing habitat needed by the animals and birds living there now. As a result, WTPCC opposes NAP and its current plans for our parks.

12

The fundamental goals of NAP are misaligned with what San Franciscans want in their parks. To date, NAP has focused on restoring open space in San Francisco to “native” status. The SNRAMP was written to interpret “Natural” to mean “Native.” That’s not what San Franciscans want their natural areas to be. We want Natural Areas to be:

- Accessible to the public
- Safe
- Well-Maintained
- Green and filled with growing things (trees and plants)

Nowhere on that list does it say “native only.”

People love Golden Gate Park (which is filled with non-native species), but it’s not always easy to get to - so they want miniature versions of Golden Gate Park in their neighborhoods. They want a variety of plants that look nice, and space that gives them a chance to escape where they can walk, run & play with their family, friends and pets. Purely native areas do not provide the same visual and recreational opportunities that our non-native areas do. That’s why people living in San Francisco more than 100 years ago introduced non-native species in the first place. Lush and green is what we want, and we’re not picky about whether it’s native or not.

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(Cont.)

The Natural Areas Plan should reflect that desire, and work to accommodate it. NAP can certainly preserve a small portion of the total parks space for native plants (much like the botanical gardens include sections that are native only), but only if these native areas can meet the requirements above (i.e. accessible, walkable, safe, well maintained and green and lush). In a densely populated urban area like San Francisco, native-only should be a “nice to have” that takes a back seat to priorities like accessible, safe and lush.

WTPCC asks the Planning Department to address the issues we identified with the Draft DEIR. We ask the Recreation and Park Commission to rethink its support for NAP.

Thank you for your consideration.

Sincerely,



Matt Chamberlain, President WTPCC

cc: Mayor Ed Lee

Board of Supervisors

Planning Commission

RPD General Manager Phil Ginsburg

Natural Areas Program Director Lisa Wayne

RPD Chief of Operations Dennis Kern

Bill Wycko, Environmental Review Officer, Planning Dept.

ADDENDUM:

WTPCC Board Member Carolyn Squeri, who has a lot of expertise handling tree issues in St. Francis Wood over the years, wanted to add the following additional comments, specifically about trees:

The two justifications given by Dennis Kern at the May 2012 WTPCC meeting for the removal of the trees were: 1) all trees eventually die anyway; and 2) ivy is already killing the trees. Rather than proactively going in and removing trees, RPD should be removing ivy – cutting it at the base will kill it – or you can pull the ivy down out of the trees.

Another point made regarding the removal of eucalyptus was that oaks were to be planted in their place so that understory plants could grow better. You can ask anyone who knows anything about trees and they will tell you that it is oaks under which nothing else can grow. Just look out in nature. Eucalyptus grow in stands with many other plants. Oaks are the trees whose leaves and acorn droppings form an inhospitable area (usually the size of the entire canopy of the tree) where nothing can grow,

WTPCC-1

13

The removal of trees from Mt Davidson and elsewhere in the city is not what the city needs or wants. Already, San Francisco has far fewer trees than other beautiful major cities. Gavin Newsom realized this when he visited Chicago and came back with ideas to plant trees on many meridians in the city. San Francisco was not planned with beautiful tree-lined streets – street trees for the most part have been an afterthought. Our parks and open areas are the only places where we can enjoy the beauty and atmosphere that trees bring.

14

There are many tree maintenance issues around the City that need attention. The NAP funds would be put to much better use:

- 1) getting the ivy out of all trees, as it will eventually strangle and kill all growth on the tree.
- 2) removing the fusarium from our remaining pine trees between November and February so that the pitch pine canker and the bark beetle do not spread. If the pines are fed with deep root fertilizer and the yellowing needles are removed, the pines will be much healthier and have longer lives.
- 3) planting many more big beautiful trees that do well in our microclimate.

15

Although oaks are native to California, I would be surprised if they were native to San Francisco. We don't get the kind of sun that oaks need to thrive. It's too moist here, especially west of Twin Peaks. You can literally count all the oaks currently in the city. We have one in St. Francis Wood. I know of one on Russian Hill. The arboretum probably has the most – and that's not many. Eucalyptus, on the other hand, thrive here. We have the kind of microclimate in which they do well with all our other plants.

The natural habitat west of twin peaks was sand dunes. The earliest settlers in the Presidio called it a god-forsaken wasteland wind-swept with sand – it was practically uninhabitable. The soldiers dreaded being there. So trees were planted as windscreens and to hold the sandy soil. Sutro Forest helped the surrounding homes by breaking the wind. Why would anyone want to go back to those sandy wind-swept days?

01
(Cont.)

NAP's plan is extremely ill advised. It flies in the face of common sense. At its most benign, it is taking something beloved and beautiful and making it less beautiful. At its worst, it is exposing the residents of San Francisco to herbicides, the ravages of wind, erosion, run-off, and mudslides and it is exposing the city to liability for damaged and down-graded property.

Adam-1

From: [Bill Wycko](#)
To: [Jessica Range](#)
Subject: Fw: comment on Natural Resource Areas plan
Date: 10/04/2011 05:38 PM

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/04/2011 05:38 PM -----

Adam
<sunshine.rider@gmail.com>
Sent by: abk132@gmail.com
To: bill.wycko@sfgov.org
cc:
Subject: comment on Natural Resource Areas plan
10/04/2011 04:37 PM

01 [I am strongly in favor of the implementation of the Maximum Restoration Alternative proposed in the Significant Natural Resource Areas Management Plan.

Adams-L-1

LILE ADAMS

310 Jersey St.
San Francisco, CA. 94114
415 285-5295

RECEIVED

October 4, 2011

**Bill Wycko
Environmental Review Officer
Planning Department
1650 Mission St, San Francisco CA 94103**

**OCT 07 2011
CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M E A**

To Whom It May Concern:

01

I am completely against the elimination or reduction of city dog parks by San Francisco Department of Parks and Recreation. Dogs and their owners need MORE space for off-leash recreation, not less. Returning parks to their natural, original state should NOT be the goal of a parks and recreation department of a major metropolis. Many needs must be balanced and it is unfair of you to ignore the needs of 150,000 dogs and their owners who reside in San Francisco, especially since a major federal agency (GGNRA) is trying to eliminate off leash recreation from a major part of their land. I urge you to abandon your Natural Areas Program and let people go to nearby natural areas like Big Basin, Yosemite, or Muir Woods, for example, if they are looking for an experience in nature that they can't find in a city. But please, don't try to make San Francisco into Yosemite.

Sincerely,

Lile Adams

Adams-S-1

SUSAN ADAMS

310 Jersey St
San Francisco, CA 94114
415 285-5295
Suca47@sbcglobal.net

October 4, 2011

Bill Wycko, Environmental Review Officer
Planning Department
1650 Mission St.
San Francisco, CA. 94103

RECEIVED

OCT 07 2011

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M E A

To Whom It May Concern:

01

This is regarding San Francisco's Park and Recreation Department's plan to reduce dog parks throughout the city in favor of implementing a Natural Area Program. My comment is: What are you thinking? Have you no sense of history or geology? You think you can restore environment of a major metropolis to its original state? Over time, things change. I get that we don't want a non-native species to consume and take over everything in our parks, but to kill perfectly healthy trees, to pull up all that ice plant along the coast simply because it is non-native is simply nuts. First, we can't support this program financially, and second, what about the dogs?

As you know, GGNRA is proposing to drastically cut back the areas in which we can have off-leash recreation. All through the comment period with GGNRA, I took great consolation in the fact we still have McLaren Park. That beautiful hill with trails that go up to the lake, where a dog can be a dog, and people can hike and take in the views of the city. And it feels like being miles out in the country, and I'm only 10 minutes from home. And you want to take that away? Not to mention Bernal Hill, Buena Vista, and Golden Gate Park Southeast? I feel there are always going to be irresponsible dog owners who will take their dog off-leash anywhere they please, rules or no rules. But many of us try to stay where we are welcomed, so people who are not dog enthusiasts can safely go to non-dog parks without fear of close encounters. But mark my words, if you reduce the number of dog parks in this city, more people will go off-leash wherever they want, and it will be chaos.

You people may not understand the improvement in quality of life a dog can bring to a citizen who likes dogs. Old people, lonely people, children, childless couples just to name a few are some who treasure their relationship with a dog. When I was diagnosed with breast cancer in 2009, my dog was my main source of comfort. That may be why there are more dogs than children living in San Francisco. It behooves you to honor that.

Sincerely,



Ahlberg-1

From: [Bill Wycko](#)
To: [Jessica Ranoa](#)
Subject: Fw: Regarding the Draft Dog Management Plan
Date: 10/05/2011 09:06 AM

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/05/2011 09:06 AM -----

Todd Ahlberg <toddahlberg@gmail.com>

10/05/2011 07:49 AM

To: bill.wycko@sfgov.org
 cc:
 Subject: Regarding the Draft Dog Managment Plan

Dear Mr. Wycko,

01

I am writing to express my deep concern over the above-referenced plan, which threatens to reduce and even eliminate many of the city's dog-play areas. As a person who struggles with severe depression and bipolar disorder, being able to spend time with my dog outdoors and seeing her run free contributes to my regime of mental health. This may sound trite, and I realize that it's difficult to understand mental disorders, but finding ANY way to smile is a big challenge for people like us. My dog is my 100% true companion, and she is sensitive to my moods and patterns. By keeping a "smile" on her face, she keeps a smile on mine.

Please consider people like us, as well as all folk who live with dogs and rely on their companionship, as this plan proceeds.

Respectfully,

Todd Ahlberg
 415-999-9791



Anonymous-1

HPC meeting on 9-21-11
 2005.1912E
 (J. RANGE)

01

Sharp Park today bears no resemblance to Alister MacKenzie's original design. The water features on five MacKenzie holes east of Laguna Salada, original holes 1, 9, 15, 16, & 17, have been culverted, eliminating crucial water hazards essential to his design. Five holes west of Laguna Salada, including original holes 3, 4, 6, 7, & 8 were destroyed completely by massive coastal storm surges and the subsequent construction of the berm, and two others, original holes 2 & 5, were severely damaged and modified to eliminate additional water features and other elements of their design. Now the site of hole 12, the original hole 2 was shortened by 60 yards and a stroke while the strategic features—including its proximity to a much larger Horse Stable Pond than exists currently—are almost completely irrelevant to the hole's play today. Hole number 5, which was considered by Jack Fleming to be "one of the most interesting holes on the course, similar to Dr. MacKenzie's 'ideal golf hole,'" is now the current site of hole 17, but other than occupying the same space the hole bears absolutely no resemblance to the original hole 5: a tee shot over Laguna Salada has been removed, and dual fairways have been combined into one, eliminating strategy alternatives integral to MacKenzie's design. Original holes 10 and 11, now the location of holes 14 and 15, have likewise been modified with changed greens and fairways that bear no resemblance to MacKenzie's layout. Indeed, Daniel Wexler argued that the original hole 10 was perhaps the course's best link, but its essential feature—a double fairway—no longer exists. Original hole 12, now the location of hole 18, has had sand traps removed from the design. In addition, original hole 13 (now 3), and original holes 14 and 15 (now the location of holes 8 and 2) described by Wexler as "not among the layout's finest" to begin with, have likewise had hazards reconfigured, as has the final original hole, 18 (now the location of hole 10). In addition, the theory of the course—the creation of a links-type, seaside course—was entirely upended when the berm was built separating the course from the ocean. In short, every link has been changed at Sharp Park—in many cases radically, and many holes have been lost completely. It is misleading to claim that any historical integrity exists at the course, let alone that 12 of these radically altered holes are "original" MacKenzie links.

Anonymous-1

HPC meeting on 9-21-11
2005.1912E
{J. RANGE}

Page 12

SHARP PARK

Being that the City had come by the lots at Sharp Park so cheaply (free in fact) they decided to bring in one of the world's foremost golf architects, Dr. Alister Mackenzie. The fact that Mackenzie and his assistant at that time, Jack Fleming, were able to design a golf course along the San Mateo County coast line was quite an accomplishment in itself. They managed to accomplish this difficult feat by dredging for fourteen months in order to build up the fairways.

On May 15, 1930 Robert Hunter, Jr. was appointed the superintendent of construction for Sharp Golf Course at a fee of \$750 for ten month's work. Four and a half months later on October 2, 1930 Willis Polk and Company was authorized to prepare plans and specifications for the starter's house at the golf course. The original cost of playing golf was \$2.00 per month and a card good for all three courses became available in May 1932 for \$5.00.

The courses's opening in 1932 was twice delayed due to wet conditions. The golf course officially opened April 1, 1932. Perhaps the fact that even the opening of the course had to be delayed twice due to winter rains should have warned of the drainage problems this site would always face. Normally a golf course will welcome the rest and revitalization the winter rains bring. In Sharp Park's case the winter rains brought about the annual flooding of Laguna Salada out on to playable portions of the golf course. This problem still persists 47 years later even though a 4,000 gallon water pump has been installed. Two factors contribute to the poor drainage problem at the Sharp Park site. First and foremost

Golf course history
 - J. Faulkner

Anonymous-1

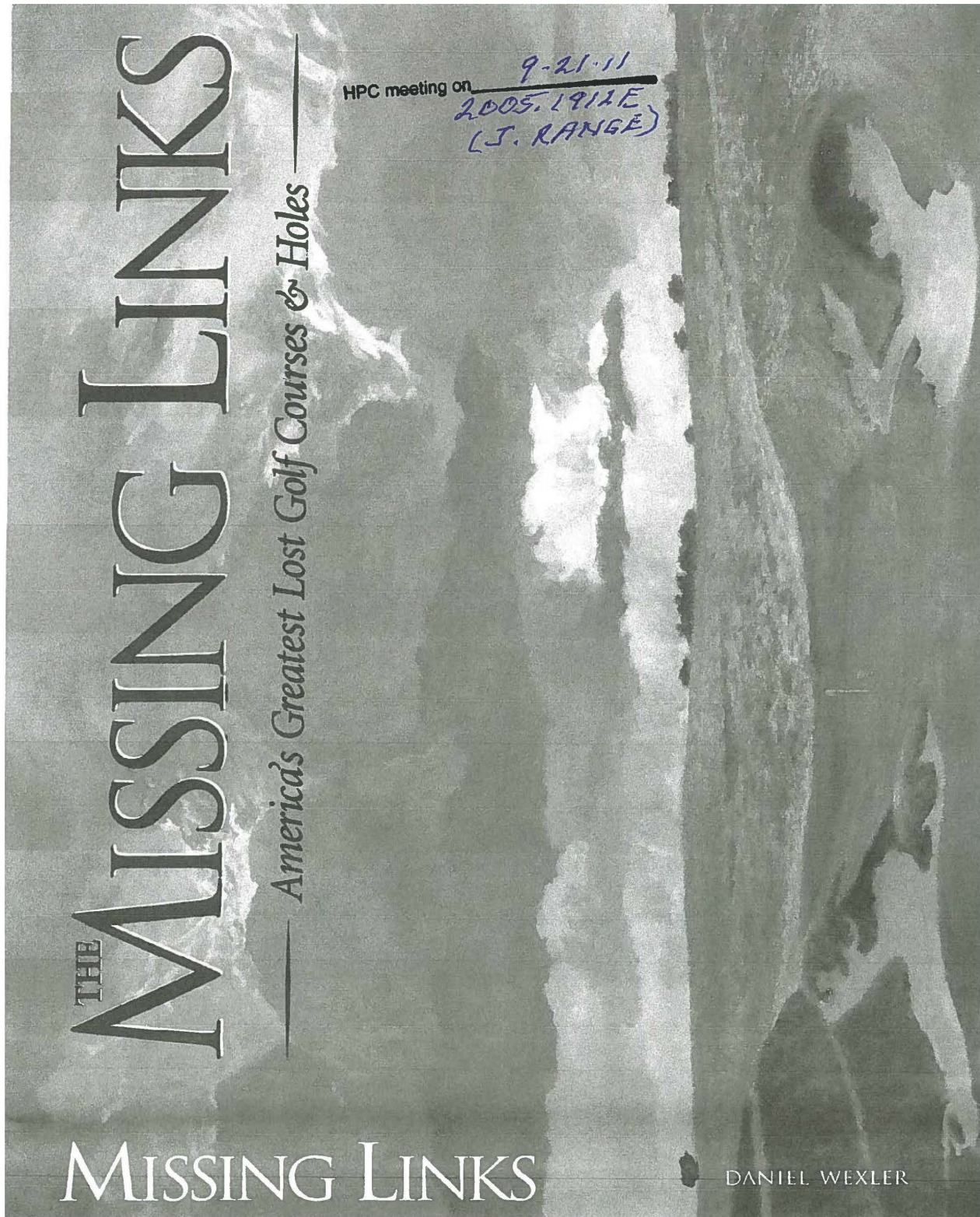
Page 13

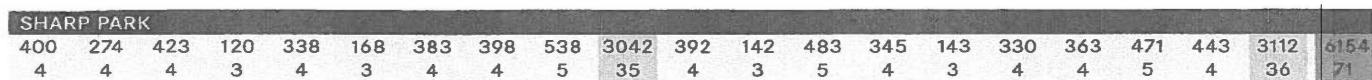
is the fact that the course is built at sea level and thus was susceptible to changing tides. The second factor was the annual flooding of Laguna Salada itself.

The golf course that opened on April 1, 1932 was becoming increasingly popular until it was severely damaged by high tides in a storm during the winter of 1938. The holes constructed on or near the beach were undated by the unchecked tides of the storm. This resulted in severe damage to the beach holes - Numbers 2 through 8. The course, generally considered one of the best tests of golf in Northern California would never be the same. The beach holes had to be abandoned and reconstruction was forced across the Coast Highway up into what is now referred to as "The Canyon Holes". The effect was much the same as taking a house with a beach view and turning it 180 degrees to face a mountain slope. This was the most drastic architectural change the Sharp Park layout would ever face. Even the State Highway construction in the early 1960's that wiped out one par three hole would not have as damaging effect as nature.

Sharp Park remains very busy to this day drawing players both from the City and from down the peninsula. During the winter, however, as the water table rises, the course becomes less playable and suffers a significant drop in play - more so than other municipal courses during the winter. One winter in the early 1970's flooding was so thorough that the unchecked water nearly reached the clubhouse.

Anonymous-1





Anonymous-1

Located just 10 miles south of downtown San Francisco, the site given to MacKenzie was uncommonly fine for a public facility, including a nearly 1,000-yard oceanfront stretch along Salada Beach. For a county whose public course facilities at Harding and Lincoln Parks were among the busiest in the nation, the development of Sharp Park was a godsend, but this wonderful property was not without its drawbacks.

For one thing, a fair amount of the land required shoring up with massive quantities of dredged sand in an expensive, Lido-like operation. Second, the site was partially divided by a small county road, a circumstance dictating that three of MacKenzie's back-nine holes be separated from their 15 brethren. Years later this road would be rerouted, though by that time the storm-driven reconfiguration of the golf course would still leave four newer holes separated, about the only commonality between MacKenzie's work and the course in play today.

The 1931 layout began with a dogleg-right par-4 of 400 yards, a strong but not especially memorable opener. But things changed quickly at the second, a 274-yard par-4 with alternate tees situated on either side of the first green. In what today might be referred to as "risk/reward" style, this nearly-driveable hole featured a large bunker front-right of the putting surface and a lake to the left of the fairway, creating the wonderful question of just how near the water one dared to venture in pursuit of an easier angle for his second.

The third was a long two-shotter of 423 yards, playing directly north along the beachfront. Again the risk/reward question was laid before us: play safely down the middle and deal with a front-right greenside bunker or aggressively skirt the beach in pursuit of an open second? Seaside winds generally affected play at Sharp Park greatly, bringing those most unlikeliest of obstacles—trees—into play along the right side as well.

Following the short fourth, a precise pitch played along the lake's westward shoreline, one reached the first of the dual-fairway holes, the 338-yard fifth. Here the player's options were numerous with a "safe" left-side route leaving the most difficult second-shot, a dangerous lakefront fairway opening up a more direct line, or the all-out blast over everything leaving a mere pitch from a wide-open angle. As at the second hole, a second tee positioned left of the previous green served to create additional angles and variety.

The 385-yard seventh was the course's second and last seaside hole, playing directly south to a long, narrow green flanked on either side by sand. The slight angling of the putting surface again tempted one to drive close to the beach (particularly if the pin was cut back-left), but the lesser presence of trees at least made this tee shot a bit more forgiving.

The 398-yard eighth, though built with only one fairway, offered two very distinct lines of play. A drive aimed safely left was simple enough but set up a nearly all-carry approach across two front-left greenside bunkers. For the man capable of controlling a long fade, however, there was the option of skirting the treeline, a shot which, if brought off successfully, again yielded a more favorable approach.

Though one hesitates to name a best hole among so many good ones, the 392-yard 10th did

Anonymous-1

a fine job of nominating itself. Here was the double fairway concept played out to the fullest, the right side providing ample safety but a bunker-obscured second, the left requiring a gutsy tee shot to a water-guarded fairway but yielding a straight-on approach. Yet again, dual tee boxes varied the challenge from day to day, making the 10th a truly great hole—but an intimidating prospect for anyone hoping to slip past the starter and begin play on the back nine.

Following the 142-yard 11th came the long 12th, a 493-yarder distinctly reachable in two, provided one avoided several prominent trees and the out-of-bounds which ran down the entire left side.

Perhaps not surprisingly, the three holes exiled across the county road were not among the layout's finest, the 345-yard 13th being the best of the bunch with out-of-bounds also threatening its more-favored left side.

With the routing having returned to the clubhouse for a third time, one set out again at the 363-yard 16th, a par-4 following much the same path as today's first hole. Here a large mound punctuated the fairway some 175 yards off the tee, offering several different angles of play. The more difficult drive was the one aimed down the right side, close to a clump of trees. Naturally this choice also provided the better approach angle to a deep, narrow putting surface.

MacKenzie closed out Sharp Park with a pair of long finishers beginning with the 471-yard 17th. Though not a particularly difficult hole, this short par-5 often faced a strong sea breeze and featured out-of-bounds left, two bunkers, a meandering brook and a green laid precariously close to a rough, marshy depression. The 18th, by contrast, was a bit of a monster, its 443 yards requiring more brute strength than finesse, though the ability to draw one's tee shot would obviously have come in handy.

It was indeed unfortunate for Sharp Park that so many of its best holes fell along the property's ocean side, for it was this flank which took the brunt of any incoming storms. Following the early 1930s deluge that washed several of these gems out to sea, a massive berm was constructed (largely upon land once occupied by holes three and seven) to prevent history from repeating itself. The subsequent rerouting of the county road and reconfiguring of the lakeside holes has further muddled things so that today only a handful of holes run consistent with MacKenzie's originals, and no appreciable trace of his strategy remains in play.

How Sharp Park Would Measure Up Today

Oceanfront holes, double fairways, MacKenzie bunkering, marvelous scenery...

Any way you look at it, even at only 6,154 yards, Sharp Park would have to stand well out in front as America's finest municipal golf course.

Restoration anyone?

Anonymous-1



1949 aerial survey reveals a number of MacKenzie's original holes still intact, plus four newer ones: built to the east. (National Archives)

115

Anonymous-1

DR. ALISTER MACKENZIE

SHARP PARK GOLF COURSE

PACIFICA, CA

Opened in 1931 / 6,154 yards Par-71

As today, some 65 years after his death, Dr. Alister MacKenzie remains perhaps the most celebrated golf architect in history, it is truly remarkable that two public courses he laid out in major American metropolises could have been so short-lived and poorly documented. Yet Bayside, as we have seen, labored in (and vanished into) almost complete obscurity—and it cannot even begin to compare with the briefly-lived legacy of San Francisco's Sharp Park.

MacKenzie's Sharp Park layout is surely one of golf architecture's most enduring mysteries. Owing to the fact that it was built in 1931, then washed into oblivion by a coastal storm shortly thereafter, its original design was seen firsthand by very few. Nor was this initial version in any way adequately recorded, with few photographs of any kind known to remain in existence. Further, a visit to today's 6,299-yard facility offers little; this vastly-altered layout serving mostly to make one wonder if a vintage MacKenzie design ever *could* have existed upon this site.

But the Doctor's original, located very much upon this same land, was all that its tantalizing prospects have suggested, a marvelous golf course featuring seaside holes, two double fairways, a large lake, and a cypress-dotted setting fairly reminiscent of Monterey. It was, in short, a municipal masterpiece.

Archer-1

RECEIVED

OCT 21 2011

10-5-2011

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
C.F.A.

To Whom It May Concern,

01 { **Many, many people LOVE Sharp Park Golf Course. We love golf, and we love that we are able to play this excellent public course. We don't think that there must be golf or animals, rather a partnership that makes everyone and every creature happy. It is possible to maintain and care for the wonderful Sharp Park Golf Course without doing away with the animals who also reside there. As I understand it, the animals did not come to live at Sharp Park until there was Sharp Park.**

This golf course is one of the most beloved around the area for lovers of golf. It is an artwork from the palette of the great golf course architect, Alistair McKenzie, and one does not destroy great works of art. One uses all resources to appreciate and value and preserve such entities. One must compromise with intelligence, not emotion. There must be developed, among rivals, a common ground, leading to compromise, on ideas about which there is disagreement, but the end must not be destruction about which we would all rue at leisure.

02 { **Please let's dialogue with a larger vision, with an eye and ear toward to opposing view, and come to understanding that such an historic golf course must remain so that generations of adults and children can play golf, the best of all sports, for a reasonable cost, on this remarkable, historic and beautiful golf course. Your attention to this issue is greatly appreciated.**

Sincerely yours,



Donna Archer

Widow of 1969 Masters winner, George Archer

Armanini-1

Bill Wycko, Environmental Review Officer
 SF Planning Dept.
 1650 Mission St., Suite 400
 San Francisco, CA 94103
 Phone: (415) 558-6378
 Fax: (415) 558-6409
bill.wycko@sfgov.org

RECEIVED
 OCT 31 2011
 CITY & COUNTY OF S.F.
 PLANNING DEPARTMENT
 M E A

Oct 28 2011

Dear Mr. Wycko:

01

Having lived and worked in the Bay Area my entire life, I am strongly opposed to the recent Environmental Impact Review and Natural Areas Program (NAP) Recommendations released by the SF Planning Department which threatens to confiscate parklands in San Francisco and Pacifica that I have enjoyed with my dogs for so many decades.

The draconian NAP recommendations call for closure of Dog Play Areas at Lake Merced, and substantial reduction in size of these areas in several parklands including McLaren Park, Bernal Hill, and Sharp Park. In addition, recommended "restoration" actions also call for the use of toxic chemicals and the cutting down of thousands of healthy, beautiful trees which would destroy the enjoyment of these parks for everyone.

02

I find the proposed "restoration" actions particularly offensive, as they are founded largely on subjective ideology that arbitrarily values theoretical vegetation and fauna from long ago in favor of current terrain and wildlife that has established itself there. I am in complete agreement with Dr. Arthur Shapiro's statements and am appalled by the fanatical ideology and proposal for current parkland and habitat destruction, especially in these difficult economic times (<http://milliontrees.wordpress.com/2011/10/10/professor-arthur-shapiros-comment-on-the-environmental-impact-report-for-the-natural-areas-program/>).

I am a longtime resident of Pacifica, and find the restrictions on the responsible citizenry and their dog companions in Sharp Park to be oppressive, depriving the local population the use of areas which we had enjoyed all our lives. More distressing is the NAP "restoration" proposals for Sharp Park, which threatens to destroy these areas for everyone.

03

As with the GGNRA Environmental Impact Statement of 2011, rational for the Significant Natural Resource Areas Management Plan (NAP; http://sfmea.sfplanning.org/2005.1912E_DEIR.pdf) is based largely on allegations, with no substantive scientific studies or third party peer review provided as evidence. Without any demonstrated evidence of impacts from dogs, there is no justification for excluding people with off-leash dogs from natural areas. There is, therefore, no justification for the closure of the DPA at Lake Merced, nor for the reductions in the DPAs at McLaren Park or Bernal Hill. Also, the NAP EIR does not take into account scientific studies that show off-leash dogs have little impact on plants and wildlife, including nesting birds when declaring that dogs have negative impacts (<http://www.sfdog.org/content/do-dogs-bother-birds>). These studies were provided to the Planning Department by SFDog in its comments on the Initial Study for the NAP EIR. Ignoring them shows that the NAP EIR is inadequate and inaccurate when it comes to dogs and "impacts."

Mr. Wycko, please do not support extreme and unsubstantiated environmental allegations and proposals being made by the NAP at the expense of local communities and citizens. In addition, please prevent the "restoration programs" that threaten to destroy existing parklands altogether.

Sincerely,



Mark Armanini
 55 San Jose Ave
 Pacifica, CA 94044
marmarini@takedasf.com

Art-1

Bock, John

From: Jessica.Range@sfgov.org
Sent: Monday, November 07, 2011 9:29 AM
To: Bock, John
Subject: Fw: Natural Areas Program should be limited

Jessica Range, LEED AP
San Francisco Planning Department
Environmental Planning
1650 Mission Street, Suite 400
San Francisco, CA 94103
Phone: (415) 575-9018 / Fax: (415) 558-6409 www.sfplanning.org

----- Forwarded by Jessica Range/CTYPLN/SFGOV on 11/07/2011 09:29 AM -----

Bill
Wycko/CTYPLN/SFGO
V
To
Jessica Range/CTYPLN/SFGOV@SFGOV
11/07/2011 09:23 AM
cc
Subject
Fw: Natural Areas Program should be limited

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 11/07/2011 09:24 AM -----

Catherine Art
<cart1997@yahoo.com>
To
"bill.wycko@sfgov.org"
11/04/2011 06:06 PM
<bill.wycko@sfgov.org>
cc
Subject
Please respond to Catherine Art
<cart1997@yahoo.com>
Natural Areas Program should be limited

Art-1

Dear Mr. Wycko,

- 01 [I support the MINIMUM of NAP activity in our parks and open space. NAP jurisdiction should not be expanded beyond their already invasive areas of activity.
- 02 [The Natural Areas Program defines "natural areas" as areas planted only with plants that grew here when San Francisco was all sand and sand dunes.
Before our city was built. Before our lush parks were created.
This narrow definition of what is "natural" is absurd. A natural area should be defined by the amount of wildlife it supports. By this definition, our parks are natural areas.

Why on earth would we want to return our parks to sand with tiny sand dune plants and coastal scrub when our parks have such incredible natural beauty and support such an incredible diversity of wildlife?
- 03 [San Francisco is a bird watcher's paradise. The hawks and owls that nest in monterey cypress and pine trees cannot nest in any of the four (tediously slow growing) San Francisco "native" trees.
Pines and Cypress are the backbone trees of our parks. They're not only beautiful, but provide habitat for countless species of wildlife. Removing these trees because they're "not native" would be criminal.
- 04 [Removing the plants that generations of gardeners have planted and tended to return these areas to sand, planted only with "native" coastal dune plants would decrease wildlife biodiversity. NOT increase wildlife biodiversity.

We should not remove any existing vegetation (never mind 1100 acres, 1/3 of our parklands) to return these acres back into sand, with only coastal scrub plants.
- 05 [I love the lush vegetation in our parks and do not want ANY of it removed for any reason - but particularly for the ridiculous reason that a radical group (funded with my tax dollars) defines "natural" as only what was here before the city of San Francisco was built, and before our beautiful parks were created.
- 06 [As SF's population continues to grow and more large housing developments are planned, demand for recreation and relaxing in our parks increases.
The Natural Areas Program fences off the areas that they first denude then plant with insignificant / tiny dune plants to create their plant museums.
Spending tax dollars to take away recreation areas from residents is outrageous.

I want more Rec and Park gardeners hired and less staff positions paid to the Natural Areas Program, who are intent on removing the lush vegetation that I enjoy in our parks.

Thank You

Sincerely,

Asher-1

**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 09:18 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: Natural Areas

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:18 AM -----

**Poe Asher**

<vizluv@yahoo.com>

10/30/2011 09:45 PM

To bill.wycko@sfgov.org

cc Poe Asher <vizluv@yahoo.com>

Subject Natural Areas

01

I am opposed to the creation of yet more 'natural' areas in San Francisco. What was appropriate a few hundred years ago is no longer the case. John McLaren would likely be on my side here. Change is a natural process. The environment, climate, populations (and needs of same) are different now. To restore planted areas to that of a historical period of time deemed appropriate isn't practical. If you want to get technical, lets go back to the time when earth was covered by oceans (which may turn out to be the case in due time anyway).

02

To create these 'natural' areas at this time requires the use of pesticides and herbicides as well as man-hours of maintenance. To lose San Francisco's forested areas would be shameful. Much of the city's beauty is due to the great number and diversity of trees that we have.

Think of the maintenance issues if that 'pesky non-native iceplant' were to be removed from Great Highway.

I, as well as many San Francisco residents with garden spaces plant many varieties of plants that foster butterflies, bees and other beneficial insects and birds in the city that would otherwise have a hard time surviving in an urban environment. Many city gardeners are also using organic methods in order to keep herbicides and pesticides out of the food chain. Many of the non-natives, while supporting beneficial insects and birds, are not as efficient in doing so and do require chemicals for their survival in the present day.

San Francisco is so fortunate to have our forested areas that support wildlife as well as (unfortunately) our private gardens. From the beach, to look back at the city and see the neighborhoods broken up by wide swaths of green is indeed beautiful. Dune grasses and sand . . . not so much. I am old enough to remember playing in large areas of the Sunset that was still dunes and grasses.

Pleas don't give more public spaces to the 'nativeists'. Let them continue to plant natives in their own private gardens.

Poe Asher
44 Ord Court

Asher-1

S.F. 94114

(A neighborhood rife with non-natives, composted gardens, no chemicals, and lots of birds, bugs and animals. Egrets and blue herons have caught fish in my yard.)

Bachmanov-1



Bill Wycko/CTYPLN/SFGOV

06/11/2012 01:06 PM

To: Jessica Range/CTYPLN/SFGOV@SFGOV
cc:
bcc:
Subject:

— Forwarded by: Bill Wycko/CTYPLN/SFGOV on 06/11/2012 01:06 PM —



Eugene Bachmanov
<bsidecon@yahoo.com>

06/07/2012 08:47 AM

Please respond to
Eugene Bachmanov
<bsidecon@yahoo.com>

To: "bill.wycko@sfgov.org" <bill.wycko@sfgov.org>
cc: "John Avalos" <John.Avalos@sfgov.org>, "Sean Elsbernd" <Sean.Elsbernd@sfgov.org>, "David Chiu" <David.Chiu@sfgov.org>, "Carmen Chu" <Carmen.Chu@sfgov.org>, "Malia Cohen" <malia.cohen@sfgov.org>, "Eric Mar" <Eric.L.Mar@sfgov.org>, "Jane Kim" <jane.kim@sfgov.org>, "Christina Olague" <Christina.Olague@sfgov.org>, "David Campos" <David.Campos@sfgov.org>, "Mark Farrell" <mark.farrell@sfgov.org>, "Ed Leel" <mayoredwinlee@John.Avalos>, "John.Avalos@sfgov.org", "Sean Elsbernd" <Sean.Elsbernd@sfgov.org>, "David Chiu" <David.Chiu@sfgov.org>, "Carmen Chu" <Carmen.Chu@sfgov.org>, "Malia Cohen" <malia.cohen@sfgov.org>, "Eric Mar" <Eric.L.Mar@sfgov.org>, "Jane Kim" <jane.kim@sfgov.org>, "Christina Olague" <Christina.Olague@sfgov.org>, "David Campos" <David.Campos@sfgov.org>, "Mark Farrell" <mark.farrell@sfgov.org>, "Ed Leel" <mayoredwinlee@sfgov.org>

Subject:

01 { The right plan to plant the trees first, wait 15-20 years and after you can cut same amount the trees as you planted

Barnsdale-1

523 Norvell Street
El Cerrito, CA 94530

October 29, 2011

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

RECEIVED
OCT 31 2011
CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M E A

Dear Mr. Wycko:

I am commenting on San Francisco's Natural Areas Program EIR.

01

San Franciscans should be warned that the movement to create so-called "natural areas" has not been successful in many places. It is based on a rather rigid view of what is "natural" and requires, ironically, intensive weeding, irrigation, and the use of pesticides. At the same time, it typically removes the areas in question from public use. None of this is appropriate for public parks. It will not serve San Franciscans well.

Here in the East Bay we have witnessed similar campaigns. One is the 72-acre Berkeley Meadow. This area was landfill, so "restoring" it back to its natural condition was a leap of imagination. The Berkeley Meadow requires constant weeding, irrigation, the use of pesticides, and the entire area is behind chain link fence save for a short, fenced walk through part of it. It has become a kind of diorama for plant that does not meet the public need for open space and recreation.

By contrast, the City of Berkeley's nearby Cesar Chavez Park, which is of similar size, is in constant use by a multitude of users – including people walking, jogging, flying kites, walking dogs, taking photographs, picnicking, and bird watching. Cesar Chavez even has a thriving burrowing owl colony.

I urge you to resist the most restrictive options proposed in the NAP EIR. They will be expensive and may, ironically, actually cause damage to the environment while not providing much-needed outdoor options for San Franciscans.

Sincerely,



Mary Barnsdale

Bartley-1



Bill Wycko/CTYPLN/SFGOV

10/31/2011 09:16 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: SNRAMP Comments

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:16 AM -----



"Eddie Bartley"

<eddie@naturetrip.com>

10/30/2011 10:23 PM

To <bill.wycko@sfgov.org>

cc

Subject SNRAMP Comments

October 31, 2011

E-mail: bill.wycko@sfgov.org
Mr. Bill Wycko
Environmental Review Officer
SNRAMP EIR
City and County of San Francisco
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103-2479

**Re: Final Environmental Impact Report for the Significant Natural
Resource Areas Management Plan Project (2005.1912E)**

Dear Mr. Wycko;

01

I am writing in support of the Final Environmental Impact Report for the Significant Natural Resource Areas Management Plan Project 2005.1912E.

Thank you for the opportunity to comment on the Significant Natural Areas Management Plan (SNRAMP) Project.

As a San Francisco natural history educator and wildlife guide I often visit these areas leading groups bird watching and performing scientific research such as nest monitoring. The incredible biologic diversity in San Francisco has inspired me on a career path that has allowed me to witness rare and wonderful creatures practically outside my door. However, as I know you are aware, I also see many significant challenges to these plants and animals living amongst a thriving urban populace despite an exceptional awareness of our citizens.

I applaud the Planning department for understanding that long term planning for the SNRAMP is imperative to get positive results. Indeed, I will only encourage the Department to take an even longer

Bartley-1

view when it comes to planting decisions and maintenance of long lived species such as trees.

Obviously, an incredible amount of energy, debate and discussion as well as public comment has already taken place well before this document was produced. Many of the agencies that have been involved including CNPS, Nature in the City, California Academy of Sciences and Golden Gate Audubon have been performing scientific research, performing and managing ecological restorations for many decades. Add on top of that experience which has come from the local National Parks restorations and we have some significant local and regional results, positive and negative to draw from.

Specific recommendations:

- 02 { 1. I wholeheartedly support the tree removal proposed in this plan, naturally taking into consideration its impact on nesting bird species. I strongly feel that certain tree species, specifically Blue Gum Eucalyptus, are not only hazardous to humans but also a nearly useless plant for native birds. Sure some of our species have managed to adapt but this is primarily due to a lack of choice. These trees monoculture and muscle out our native understory and the associated plant and animal system that our native wildlife has evolved with. A tree plan even longer term than fifty years should consider native and near native trees such as Monterey Cypress and pines, Coast Redwood and Live Oak as gradual but steady replacements for all Blue Gum. San Francisco could and should set the standard for the elimination of this dangerous pest tree.
- 03 { 2. With the exception of public safety issues tree removal and maintenance should always occur between nesting seasons. Native birds begin nesting as early as January and extend through July for the many species that breed in San Francisco. A moratorium on significant arborist work should begin by mid-February and extend through mid-July. Through our studies we have found that trained biologist nest monitors will miss bird nests on their surveys. City arborists should work with local avian biologists, many who are already performing nest monitoring, to ensure the highest levels of safety for citizens and wildlife.
- 04 { 3. Considering long term costs and the current budget: Today San Francisco, like all U.S. municipalities, is suffering from the effects of a national recession. This will not likely be the case in five or ten years but maximizing the efficiency of available staff should always be a goal of long term planning. One way to maximize that efficiency is through a reduction of long term maintenance burden. Trees in a city require professional arborists for safety reasons and are much more expensive to maintain than grasslands or coastal chaparral in the long term. Most local native plants, once well established, require less or no irrigation and little or at least less maintenance. As has been demonstrated motivated volunteers can make a huge, cost-effective, difference on small scale restorations using simple tools.
- 05 { 4. Sharp Park should be considered separately from the rest of the plan. While we have many unique ecosystems in San Francisco Sharp Park is perhaps the most unique of all San Francisco properties. The city is already in violation of the Endangered Species Act and with the acknowledged sea level rise the only reasonable course is to return this property as a wetland. Continuing to wasting resources maintaining this property as a golf course is a grave mistake. Spending millions and perhaps tens of millions of dollars on a park that very few San Franciscans even know about instead of focusing on improvements of city parks is an egregious waste. If the proposed policy continues we guarantee that it will be looked back on as folly.
- 06 { 5. Thank you for including feral cat considerations in several parts of the SNRAMP. Feral cats and their feeding stations should not be permitted in any of the natural areas parks

Bartley-1

- 06 (Cont.) { and open spaces. It is a biological fact that the allowance of feral cats has been a primary cause for steep declines in avian diversity in San Francisco including the near extirpation of the California Quail.
- 07 { 6. Dog impacts on the more environmentally sensitive areas such as wetlands and waterways need to be more fully addressed. I am a strong advocate for official dog play areas but these play areas should be situated well away from the most significant natural areas. A clear delineation of all dog play areas needs to be maintained in any case.
- 08 { 7. It is time for the city to enforce existing dog owner laws including the requirement of licenses. These license fees pay for our understaffed and overwhelmed Animal Care and Control Department. Lack of enforcement is seen as a dereliction of duty from this citizen's point of view.
- 09 { 8. Trash containers at all parks need to be wildlife resistant. Population levels of meso-level predators such as Common Raven have grown exponentially in the last twenty years in part due to access to human food waste. These animals in turn have a negative impact on other native species such as raptors who are primary natural pest control agents. Also Norway rat populations have increased due to access to garbage and until rodenticides are outlawed for use by citizens use of them on rats will continue which has a double whammy effect on Owls and Raptors when they catch a poisoned rat that in turn kills them (in an excruciating manner). Increased education and enforcement of wildlife feeding laws will also help in this regard.
- 10 { 9. Dumping green waste along the sides of the lake causes algal blooms due to the increased nitrogen. Same goes for fertilizers on the golf courses – both practices should end.
- 11 { 10. Replacing natural play field areas with artificial turf is neither good for nature or humans. It has been clearly demonstrated that the long term impacts are overwhelmingly negative economically and environmentally. I don't at all understand why the city is still considering this.
- 11 { 11. Thanks to the Freedom of Information Act I have been able to read some of the other comments that have been forwarded to your department about the Plan but one from Professor Arthur Shapiro stuck out. I offer the following comments as a response to Mr. Shapiro's October 6 critique:
 Arthur Shapiro's philosophical critique fails to educate the process or the decision makers at the SF Planning Department on any specific aspects of the plan. True, he isn't being paid for consultation work (although that might be a great idea) but he certainly put some energy into his critique of the plan. Maybe he will offer more substantial advice in the future with a little encouragement.
- Despite his annoyed tone however a few good points for debate (and perhaps some reasons for his derisive attitude) may be read into his letter:
- 12 { 1. Wasting time and money on certain invasives that can't be overcome: A popular trend amongst evolutionary biology scientists and ecologists is that we need to accept that many of the species that have been human introduced are impossible to remove so we might as well get used to it. European grasses and some shrubs (i.e. Broom) are a prime example of that locally. The fertile SF Bay itself may be the most dramatic regional example of introduced species gone wild. Still, some particularly disadvantageous species can be controlled relatively easily or wiped out altogether.

Bartley-1

13

2. Carbon Sequester models - Trees vs. grasslands, etc.: If you completely buy into theories that our current climate change is primarily being driven by human impacts then methods of maximizing carbon sequestering by our planting (or un-planting) choices should be considered. Shapiro mentions trees vs. "artificial" grasslands (presume he means artificial turf) - well, that's a no-brainer but what about comparisons of natural grasslands (both non-native and native) vs. tree forests or even marshlands? There is disagreement amongst researchers on what habitat types sequester the most carbon and trees are not a clear front runner.

As far as the SNRAMP goes Mr. Shapiro is over-thinking the situation. For one, we are only talking about 500 acres out of the 30,000 acres in the city itself. These properties will need to be maintained to some degree regardless of whether they are maintained with the goal of maximizing native diversity or not. After two decades of not-too-aggressive restorations here in SF the results are becoming clear and the folks who have been working on these restorations have seen results mostly positive, some negative, plus a few unintended consequences. This is going to happen and it is the process from which to learn by.

Consider these examples of small restorations increasing bio-diversity:

Heron's Head Park - only four acres of marsh and 10 acres of upland restoration beginning in the early 1990s - Clapper Rails (out of a population of <1500), Black-necked Stilts breed there for the first time in modern history, White-crowned Sparrows and Black Oystercatchers have increased number significantly.

Pier 94 - Thought extinct, California Suaeda is now self propagating at this tiny site.

Lobos Dunes - one year after the restoration of this habitat was complete Western Bluebirds nested in SF for the first time since the 1920's.

Through very modern methods, Franciscan Manzanita is now being re-introduced in earnest from a single surviving plant.

These are but a few of the many examples of restoration successes here in SF that have added greatly to our knowledge and quality of life here.

As for Shapiro's unfortunate "Guilt-driven, self-hatred" comment...uh, that would be no. None of us living today voted for slavery, dropped the A-bomb or wittingly introduced invasive non-native species. Most of us live in high density housing in a city that has been a leader in many things environmentally green. No, we were born into our individual situations, gradually found out about these things as we grew and simply realized we can do better than those that came before us.

"Vast Evolutionary Opportunity"? Nice one coming from a "distinguished" British plant ecologist. Anyone who has visited England or knows the sad tale of British ecological history where their entire forest system was destroyed in order to make glass will shake their heads on that one. Recognizing denial as a legitimate defense mechanism is OK but asking us to give up

Bartley-1

and accept defeat of our own biological heritage is too much.

We should not simply accept the mistakes of poor planting decisions any more than we should be OK with the radiation and toxic pollutions that have been left for us to deal with by our predecessors at places like Hunter's Point or allow poisons to be introduced into our homes, watersheds and parklands by chemical companies. Those folks didn't fully realize what consequences would come from their actions or perhaps even care but now we know and when it can feasibly be fixed or, at least made better, it should be. The SNRAMP project is a very good beginning for addressing some of this neglect.

Budgetary limitations will always be a factor but native animals and plants are real "precious resources" that should be encouraged and never wasted. Money comes and money goes; not necessarily so plant and animal species. We've lost some forever and brought others back from the brink so it is not like we don't know. If we can improve the chances for marginalized local species or help save one from extinction that will be caused by humans the value of that is simply "priceless" and generations to follow will be grateful for these efforts.

Thank you for this opportunity to comment on these plans. Please feel free to contact me to discuss any of these recommendations further.

All the best,

Eddie Bartley
President of Nature Trip
San Francisco, CA
www.naturetrip.com

Bartolotta-1



Bill Wycko/CTYPLN/SFGOV
10/31/2011 11:47 AM

To Jessica Range/CTYPLN/SFGOV@sfgov

cc

bcc

Subject Fw: Rec and Park Dept's Natural Areas Program (NAP).

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 11:48 AM -----



Victor Bartolotta
<vbartolotta@yahoo.com>

10/31/2011 10:13 AM

Please respond to
Victor Bartolotta
<vbartolotta@yahoo.com>

To "bill.wycko@sfgov.org" <bill.wycko@sfgov.org>

cc

Subject Rec and Park Dept's Natural Areas Program (NAP).

Dear Mr. Wycko,

I am shocked at the overreach of the Natural Areas Program proponents. The enactment of this program would deprive San Franciscans of rare and valuable recreation space. The cultivation and preservation of pleasant parklands within the confines of San Francisco's 49 square miles has a negligible impact on California's 163,000 square mile area.

Furthermore, the EIR includes misstatement of facts, speculation and opinions represented as observations:

01

1) The NAP EIR provides no evidence to prove claims that dogs have an impact on plants and wildlife in natural areas. An EIR should be based on scientific evidence, and there is little presented here. Because the NAP EIR's analysis of impacts from dogs is not based on any evidence, the analysis is inadequate. Without any demonstrated evidence of impacts from dogs, there is no justification for excluding people with off-leash dogs from natural areas. There is, therefore, no justification for the closure of the DPA at Lake Merced, nor for the reductions in the DPAs at McLaren Park and Bernal Hill.

02

2) The NAP EIR does not take into account scientific studies that show off-leash dogs have little impact on plants and wildlife, including nesting birds when declaring that dogs have negative impacts. These studies were provided to the Planning Department by SFDog in its comments on the Initial Study for the NAP EIR. Ignoring them shows that the NAP EIR is inadequate and inaccurate when it comes to dogs and impacts.

03

3) The NAP EIR repeatedly says: Dogs MAY be impacting protected plant species or wildlife (pp. 297, 298, 305, 306, 472, 473, 502, 517), yet offers no evidence these impacts are actually occurring or ever have occurred. Unsubstantiated claims cannot be made in an EIR. After each of these examples, the EIR then goes on to say: Dogs MAY continue to impact plants or wildlife. If there's no proof of an impact, then that impact cannot

Bartolotta-1

- 03 { .continue.. EIRs must be based on observed impacts, not things that .may. happen. The analysis in the EIR based on this speculation is incorrect and inadequate.
- 04 { 4) In several places, the NAP EIR says: Observations indicate dogs are impacting erosion, or plant damage, or damage to natural communities (pp. 471, 500, 505, 516, 519), yet offers no information on these .observations.. Who made them? Were they done in a scientifically rigorous way? Were they made by people biased against dogs? We have seen with the GGNRA's attempts to get rid of dogs and with Point Reyes attempts to get rid of an oyster farm that reports by .observers. biased against dogs or oyster farmers do not stand up to independent scientific scrutiny. Is this the case here as well? We do not know, since the NAP EIR provides no information about them. Again, EIRs should be based on solid, scientific data, and definitely not on anecdotal .observations.. If not, their analyses cannot be trusted and are inadequate.
- 05 { 5) The NAP EIR does not differentiate between impacts caused by people with dogs and impacts caused by people without dogs. Do people in the natural areas with dogs cause significantly more impacts than people in the natural areas without dogs? Clearly a 200-pound person will have a much more significant impact on plants than a 20-pound dog. Because this was not evaluated in the EIR, the analyses presented in the NAP EIR are inadequate. If there is little difference in impacts, then the EIR cannot justify banning dogs from the natural areas.
- 06 { 6) The NAP EIR considers only the NAP plans to close 15% of the legal off-leash space in SF city parks when considering impacts on the remaining DPAs and on recreation. However, the NAP plan also calls for expanding the most sensitive areas within natural areas, and this potentially could result in the closure of significantly more DPAs (up to 80% of the total off-leash space currently available in city parks, off-leash space that is located either within or adjacent to a natural area). These added closures (up to 80%) will significantly increase the impacts on recreation, on people with dogs, and on the remaining DPAs. These increased impacts were not considered in the EIR when it evaluated the Project Alternative, and without them, the analysis of the Project Alternative is incomplete and inadequate.
- 07 { 7) The NAP EIR acknowledges that the NAP plans to close 15% of the DPAs in city parks immediately, when added to the GGNRA's plans to cut off-leash access by 90%, will have a significant and unavoidable cumulative impact on remaining off-leash areas in city parks and on recreation. However, the EIR says that because they don't know the final GGNRA plan, they cannot analyze what that cumulative impact will be. We do know what the GGNRA originally proposed (cutting off-leash access on its lands by 90%) and the cumulative impact of that plan, when combined with the NAP closures can and should be analyzed. We saw on Tsunami Friday what the impacts could be. The GGNRA closed both Fort Funston and Ocean Beach to all visitors on the morning of Friday, March 11, 2011 because of concerns that a tsunami triggered by a major earthquake in Japan would strike the coast. The busiest weekend days normally find about 60 dogs at the Pine Lake DPA at any one

Bartolotta-1

07

time. Weekday mornings normally have far fewer, closer to 20. On Tsunami Friday, a Rec and Park Dept staffer counted over 200 dogs at the Pine Lake DPA at 10 am, almost 10 times more dogs than on a normal weekday and more than 3 times the maximum numbers of dogs seen on weekends. This example can be used to quantify the cumulative impacts of the GGNRA and NAP closures of off-leash space. The analysis presented in the EIR, which does not contain this, is inadequate.

08

8) The number of DPAs in city parks listed in the NAP EIR is wrong. Page 155 says there are 19 DPAs, when the actual number is 29. To get such a basic fact wrong is shocking and calls into question other information about dogs, such as their alleged 'impacts' on plants and wildlife.

09

9) The NAP EIR incorrectly summarizes RPD's so-called moratorium on creating new DPAs until a systemwide survey of DPAs is conducted. The NAP EIR says that this moratorium was a directive from the Rec and Park Commission that was announced at the October 10, 2006 meeting of the RPD Dog Advisory Committee (DAC). This is not true. The idea of a systemwide survey of where dogs and DPAs are in San Francisco came not from the Commission, but from RPD staff. It was not discussed at the October 2006 DAC meeting. It was not fully discussed in the DAC until 2007 when RPD made the decision to sunset the DAC and conduct the citywide survey. While the survey was being conducted, the DAC was told, there would be a hold on new DPAs. The DAC was told the survey would take maybe a year or a year and a half at the most. The idea of the citywide survey was not presented to the Rec and Park Commission until mid-2007. This was no direction from the Commission. This hold was never meant to be permanent. Yet the NAP EIR implies it will last for decades (the length of time covered by the NAP EIR) and therefore the EIR does not have to consider new DPAs. In the four years since the DAC was sunset, however, RPD has done nothing on the citywide survey. And now this inaction by RPD is being used to prevent the EIR from considering whether or not creating new DPAs to replace ones closed by NAP could decrease the impacts of the closures. The NAP plan will last for decades, and for the NAP EIR not to consider a major mitigation like opening new DPAs to replace closed ones because of a temporary halt on new designations is absurd. Any analysis of alternatives that does not include this possible mitigation is incorrect and inadequate.

10

10) The NAP EIR assumes that, because the DPAs at McLaren Park and Bernal Hill are not being closed completely, the 15% closures will not cause a significant number of people to drive to other parks to walk their dogs. People will just walk in different parts of the parks that are still off-leash, the EIR assumes. However, the NAP EIR does not take into account the topography of the remaining land in the two DPAs. If what is left is mostly steep hills, people will not be able to walk there with their dogs. Thus, even though the acres of off-leash space may remain relatively high in these two parks, the amount of space that is practically available for off-leash access may be much less. This will increase the impacts on recreation and also will make it more likely that people will be forced to drive to other parks to walk their dogs off-leash. This must be included in the analysis of any and all alternatives. Since it is not, the analysis in the NAP EIR is inadequate.

Bartolotta-1

- 11) The NAP EIR does not adequately consider the impacts of the use of herbicides, especially Garlon, on dogs who walk either within or adjacent to natural areas (this applies whether the dog is on- or off-leash). In a paper on the effects of Garlon, the Marin Municipal Water District (http://www.marinwater.org/documents/Chap4-Triclopyr_8_27_08.pdf) notes that Garlon can cause kidney problems in dogs because of their limited physiological ability to excrete weak acids such as those in Garlon in their urine (they are somewhat unique among mammals in this). The NAP's reliance on herbicides to speed the removal of non-native plants in natural areas will have a negative impact on the health of dogs walked where it has been applied. This is especially true in Glen Canyon, where Garlon was applied over 30 separate times last year. This impact was not considered in the Hazards and Hazardous Materials section of the NAP EIR and a discussion of the health impacts on dogs of repeated exposure to Garlon should be included.
- 12) The NAP EIR says that the impact of people driving to other parks to walk their dogs because of the closures of 15% of off-leash space at Lake Merced, Bernal Hill, and McLaren Park will be less than significant because there will remain sufficient off-leash space in those parks (except for Lake Merced). However, the EIR does not consider the impact of people driving to other parks if 80% of the legal off-leash space in city parks is eventually closed because NAP claims impacts from dogs. This must be included in the analysis of the Project Alternative, and will likely show a much more significant impact than what the EIR now shows.
- 13) The NAP EIR refers to dogs as .nuisances.. The EIR does not consider any positive aspects of dog walking, including the physical and mental health benefits to people who walk with their dogs. This lack is especially noticeable in sections dealing with impacts on recreation of the various alternatives considered. The reason so many people walk their dogs off-leash in Bernal Hill and McLaren Park is that those areas are large enough that people can hike long distances with their dogs off-leash. The majority of DPAs in city parks are too small for similar hikes. You can play fetch with a dog in these smaller DPAs, but not take a long walk. You cannot have the same recreational experience in a small DPA that you can have in a larger one; DPAs are not interchangeable. This difference in DPAs creates a significant impact on the recreational experience for dog walkers if the DPAs in Bernal Hill or McLaren Park are closed. In addition, there would be a significant negative impact on the physical and mental health of dog walkers if 80% of off-leash space were closed because NAP claims impacts from dogs. This is not considered in the NAP EIR, which is inadequate without it. These negative impacts on the physical and mental health of dog walkers of the 80% closure will be amplified considerably when combined with closures of off-leash in the GCNRA. This must be considered in the cumulative impacts sections.
- 14) The NAP EIR does not adequately analyze mitigations should any impacts from dogs be proven other than closing the DPA. Fences are mentioned briefly, while DPA closures are featured prominently in the EIR. Other mitigations . education, signage, more extensive

Bartolotta-1

14

fencing, etc. . are not discussed. NAP seems to go straight from a single impact to closing the DPA.

15

15) The NAP EIR states that impacts to land use planning can be considered significant if they have a substantial impact on the existing character of the vicinity.. (p. 176) In all of its analysis of impacts on the existing character of the vicinity, the NAP EIR never considers the impact on the social community of people who walk with their dogs in the DPAs and portions of DPAs that NAP wants to close. This community, in many cases, defines the existing character of the park. Dog walkers are perhaps the most diverse group of park users. If you watch dog walkers in SF city parks, you will see kids and seniors, people with disabilities, gay and straight, every ethnic and religious group, and every socioeconomic class walking, talking and laughing together, all united by their common love of dogs. There are few places in San Francisco where you will see so many different types of people interacting without rancor. People who walk in the same park at the same time every day know their fellow dog walkers. These friendships extend outside the park into the neighborhoods, helping create the sense of belonging to a community that is so important in today's impersonal urban society. Closures and reductions in DPAs (especially if 80% of the total off-leash space in city parks are closed) will have a significant negative impact on these social communities. DPA closures will destroy these communities. Because the NAP EIR did not consider these impacts on community of those who live near and walk in parks, it is inadequate.

16

16) The NAP EIR does not adequately consider the impacts on the social fabric of San Francisco if one-quarter of its city parklands are closed to residents. Natural areas are not generally accessible to people, whether they have a dog or not. The NAP plan calls for the closure of many trails and reduction of recreational access. You cannot play catch with your child, have a picnic lunch, or play with a dog in a natural area. It can only be a plant museum. The EIR does not adequately consider the significant impact on families and the sense of shared community that access to parks fosters in our urban setting.

17

17) The NAP EIR does not adequately analyze the impacts on recreation of NAP plans to plant sensitive plant species (those that are listed as either endangered or threatened) throughout its natural areas. These plants, by virtue of their special status, trigger automatic federal and state protections, the primary one of which is severe restrictions on access to people and dogs. The NAP goal to preserve existing remnants of historical habitat does not require the planting of threatened and endangered species. There are plenty of native species that are not threatened or endangered that can be planted in San Francisco's urban parks. Ecologists have noted that planting a few sensitive species plants does little to preserve the species. It is not an ecological decision; it is a landscaping decision. So why does NAP feel it should plant so many sensitive species when it knows their mere presence will require NAP to restrict access to its lands? The NAP EIR should consider the major negative impact on recreation that planting threatened and endangered species causes in its analysis of the Project Alternative and other alternatives.

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- 18) The NAP EIR does not consider impacts on recreation and land use from the fact that NAP controls the entire park in over half of the parks (18 of 32) where there is a natural area. No other recreational use is possible in those parks. In an additional 10 parks, NAP controls over 50% of the land. Only four of the 32 parks with natural areas have less than 50% of their land controlled by the NAP. A majority of land under NAP control citywide (57%) will have significant restrictions to access by all people (not just people with dogs); that is the amount of land designated as MA-1 and MA-2. In 8 parks, all of the land in the natural area are designated as MA-1 and MA-2, with resulting significant restrictions on access to everyone. In some cases, this denial of access will be in the only park within easy walking distance in the neighborhood. The NAP EIR must consider this large-scale denial of access when analyzing the Project Alternative.
- 19) The NAP EIR does not adequately consider the negative impacts on aesthetics and land use of poor maintenance in natural areas. In most parks, the NAP plan allocates fewer than 20 days/year for planting/maintenance of the natural areas. In 16 of the 32 natural areas, 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. The NAP EIR should have considered the impacts of scaling back the program to a few areas that can be well maintained, as opposed to the current plans to take over one-quarter of San Francisco's city parkland. The NAP plan is 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.
- 20) The NAP EIR does not consider the negative impact on aesthetics of NAP management decisions. For many people, brush piles used in natural areas look like accumulations of trash and are aesthetically displeasing. 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. Because these impacts were not considered, the NAP EIR is inadequate.
- 21) The NAP plans call for cutting down over 18,000 healthy trees simply because they are not native. The NAP EIR does not adequately consider the long-term impacts on climate change and global warming of the conversion of land covered by trees with grasslands. Trees are much better at carbon sequestration than grasslands, and the long-term consequences of this difference are not adequately considered. For more on NAP impacts on trees, see: <http://milliontrees.wordpress.com>
- 22) The NAP EIR does not adequately consider the fact that the climate in San Francisco has changed (and continues to change) from the time several hundred years ago that the NAP plan is trying to re-create. Native plants suited to the earlier climate may no longer be suited to today's (and tomorrow's) climate. The NAP EIR does not consider the lack of sustainability of trying to re-create what the habitat was at one snapshot in time when the climate has changed since that time. The environmental consequences (for example,

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- 22 [more herbicides, etc.) of trying to force the old habitat into today's climate should be analyzed more thoroughly.

Best regards,

Victor
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October 31, 2011

SUBJECT: Significant Natural Resource Areas Management Plan (SNRAMP) – Draft
Environmental Impact Report, August 2011, State Clearinghouse No. 2009042102

To the San Francisco Planning Department:

Please consider my comments on the Significant Natural Resource Areas Management Plan (SNRAMP) programmatic draft EIR (DEIR), which focus on one of the stand-alone projects covered in the programmatic DEIR, Sharp Park Laguna Salada wetland “restoration” project. These comments represent my independent professional opinion, and were not prepared on behalf of any organization.

My qualifications to provide expert comments on conceptual restoration alternatives for coastal wetlands are based on over 30 years of professional work in coastal wetland and terrestrial ecology, with emphasis on planning, management, and restoration of degraded coastal wetlands. Following my Ph.D. research in coastal ecology, I spent nearly twenty years as a professional technical planner and advisor on California coastal wetland restoration and management, with emphasis on recovery of rare and endangered species. I have worked for the U.S. Fish and Wildlife Service and U.S. Army Corps of Engineers in this capacity, and I have provided consulting services and peer review for California State Parks and National Park Service, and CAL TRANS on coastal lagoon enhancement and restoration projects along the Central Coast during the last 5 years (Rodeo Lagoon, Crissy Field (Presidio) Lagoon, Big Lagoon, Laguna Creek Lagoon, Pilarcitos Creek mouth, Scott Creek Lagoon, Waddell Creek Lagoon). I am a co-author of a 2011 technical report on Laguna Salada wetland restoration alternatives (PWA 2011), and I was an invited speaker to the Sharp Park advisory working group convened by San Francisco Recreation and Parks Department in November 2010, where I presented an introduction to California coastal lagoon wetlands, with an emphasis on Laguna Salada and similar lagoons.

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My comments generally concern the level of analysis provided in the programmatic DEIR for the stand-alone project at Sharp Park, deficient analysis of impacts and mitigation, and the lack of meaningful evaluation of less environmentally damaging alternatives proposed to achieve the same basic purpose as the proposed project. The rigor of impact and alternatives analyses in CEQA should be commensurate with the sensitivity of the environmental setting, and the potential for significant impacts. As explained below, the DEIR presents a seriously flawed and inadequate CEQA assessment of impacts, mitigation, and alternatives for the stand-alone Sharp Park “restoration” project.

1. The DEIR fails to identify the extent of wetlands filled for the purpose of conversion of marsh to golf fairways rather than enhanced upland habitat for endangered species, and fails to identify mitigation for wetland filled to enhance upland golf greens.

The DEIR fails to disclose that a significant area of existing wetlands bordering the northeastern end of the lagoon would be filled and converted to upland golf greens, rather than filled to provide enhanced habitat for endangered wildlife. This fill is shown in Figure 14 of Appendix I (Tetra Tech 2009) and described in a text box in a misleading and inaccurate way as “raise fairways to reduce flooding” along the inland side of the “habitat boundary” mapped near hole 14. Neither the restoration plan nor the DEIR identify the fairway areas to be filled and raised above flood elevations as including existing wetlands consisting of freshwater marsh mown down to a low turf to function as part of a fairway. The mown marsh is in fact composed of dominant marsh vegetation identical to the marsh that isn’t mown on the other side of the artificial habitat boundary. The “habitat boundary” in fact is the line of mowing that encroaches into the marsh, not the boundary between upland and wetland soils and vegetation. It is entirely artificial, nominal boundary. The mown marsh was identified as one of the existing degraded conditions of the Laguna Salada wetland complex in the January 2011 report on Laguna Salada restoration alternatives (PWA 2011), which was provided to the City of San Francisco. It was also shown and explained to representatives of the Recreation and Parks Department in a slide presentation at the November 2010 Sharp Park “working group” meeting at McLaren Hall.

The mown marsh area lying within the proposed fill area falls entirely within the criteria for wetlands protected by policies of the California Coastal Commission, and it meets all criteria for wetlands under the current U.S. Army Corps of Engineers wetland delineation manual.

The identification of the marsh as wetland is obscured by regular mowing that makes it resemble golf turf, but the mowing does not alter the basic jurisdictional criteria of the wetland determined by dominant obligate and facultative-wet wetland species, hydric soils, and winter flooding and saturation for multiple weeks. The fill of this mown marsh and its conversion to upland golf greens is neither identified as an impact, nor evaluated for impact significance, nor mitigated in any way.

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Mowing of freshwater marsh with saturated soils at the surface mown to height of golf turf, annexing marsh to golf links at N Sharp Park ; fresh-brackish marsh species composition of the mown marsh turf at marsh edge is identical with adjacent marsh: silverweed, three square bulrush. Mown marsh grades into facultative wetland grasses (creeping bentgrass) and brass-buttons. Mown marsh zone extended approximately 3 to 5 m (variable) from the unmown emergent marsh edge in 2010.



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The golf turf mowing encroaching the northeast end of Laguna Salada, extending directly into the marsh and riparian woodland zones. The apparent golf turf is mown marsh with vegetation composed of the same fresh-brackish obligate and facultative-wet marsh plant species on the lagoon side of the photos: coast bulrush (*Schoenoplectus pungens*) silverweed (*Potentilla anserina* ssp. *pacifica*), creeping bentgrass (*Agrostis stolonifera*) and brass-buttons, *Cotula coronopifolia*. The seasonally flooded outer marsh and its terrestrial ecotone are replaced by turf even with pumped drawdown of the lagoon. Photos: June-August 2010.

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2. The DEIR fails to analyze and mitigate significant predictable impacts of pre-construction lagoon drainage, and dredging sulfidic, anoxic coastal lagoon sediments.

The DEIR's level of CEQA analysis of the proposed 60,000 cubic yard maximum dredging project at Laguna Salada is inadequate for a highly sensitive coastal wetland complex inhabited by two federally listed wetland-dependent endangered species (California red-legged frog, San Francisco garter snake), regardless of intended "habitat restoration" or enhancement aims. Outstanding aspects of this deficiency are evident in the lack of DEIR analysis of the following proposed "restoration" actions and impacts, as well as the omission of reasonable and feasible alternative "restoration" methods:

- draining (dewatering) Laguna Salada prior to construction and dredging, proposed in the Sharp Park Conceptual Restoration Alternatives Report cited by the DEIR (Tetra Tech 2009, Appendix I of the DEIR)
- if the lagoon is not drained prior to construction activities, sediment and water quality impacts of dredging in a closed fresh-brackish lagoon system where red-legged frog tadpoles are present;
- omission of any feasible alternative methods of wetland habitat enhancement other than dredging, such as modification of lagoon water level and flooding management.
- omission of wetland fill at the northeast end of the lagoon, where marsh is currently mown to function as golf turf, to convert them to elevated upland golf fairways (failure to identify wetlands regulated under current policy criteria of the California Coastal Commission, as well as erroneous omissions from the past Clean Water Act Section 404 wetland delineation)

The proposed draining of Laguna Salada to prepare for "restoration" construction is clearly articulated in Appendix I of the DEIR (Tetra Tech 2009; DEIR Appendix I, p. 48), but the impacts of draining the lagoon are not assessed in the DEIR. This is an incredibly oversized omission; dewatering the lagoon alone would be sufficient as a significant impact to trigger an EIR. Dewatering the lagoon would kill any late-maturing California red-legged frog tadpoles present in any part of the lagoon prior to dewatering, and would be expected to result in "take". This would be a highly significant impact requiring mitigation, and the only feasible mitigation measure would be to avoid draining the lagoon, i.e., an alternative method. Incredibly, the restoration plan on which the DEIR relies suggests as the only mitigation for draining the lagoon an absurd "capture and relocation" (to where?) of endangered species stranded by lagoon dewatering, with vague, unspecified actions arising during future endangered species consultation to address the uncertain feasibility of mitigation :

...although every effort would be made to capture and relocate sensitive wildlife resources prior to construction, the possibility of harm to listed species remains although every effort would be made to capture and relocate sensitive wildlife resources prior to construction, the possibility of harm to listed species remains. Impacts to listed species would be addressed

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extensively during the Section 7 consultation process with USFWS and during similar consultation with CDFG, and standard and specific practices to minimize the potential for take will be developed at that time. [Tetra Tech 2009, p. 48]

The DEIR simply includes no impact analysis or mitigation for the immensely significant impact of dewatering the lagoon prior to project construction.

If the lagoon is drained, the exposure of sulfidic anoxic lagoon bottom sediments to oxygen on the drained lagoon would release hydrogen sulfide (also not addressed in air quality impacts), and cause rapid oxidation of ferrous and other reactive reduced sulfide compounds, releasing abundant sulfuric acid, ferric oxides, phosphates, and ammonia – all of which would be potentially toxic to aquatic or amphibious wildlife. The DEIR fails to disclose obvious strong indicators of highly sulfidic, anoxic sediments exposed during summer drawdown (low water levels) in the lagoon, as shown below.



Iron oxide surface films and iron sulfide accumulation of muds exposed by artificial lagoon drawdown. Iron oxide (orange-brown mineral films indicative of oxidation of iron sulfide and acid sulfates in brackish coastal sediments subject to alternating strong hypoxia and oxidation) are apparent in drawdown-emergent muds at the northeast end of Laguna Salada (left). Organic rich sediment immediately below the iron oxide-stained surface sediment film is deep black (right), indicative of toxic iron sulfide, formed under strong anoxic bottom conditions, exposed at the marsh surface by artificial drawdown of the lagoon.

If the lagoon is not drained for dredging, dredging would cause suspension of anoxic, sulfidic bottom sediments in the water column of the lagoon, which would potentially cause hypoxia (severe oxygen deficiency associated with high mortality of fish, amphibians, and invertebrates in the water column) and mobilization of toxic sulfides and ammonia. The DEIR severely underestimates the potential severity, complexity, and persistence of wetland impacts due to dredging anoxic, sulfidic organic lagoon bottom and marsh sediments (DEIR, p. 370). The DEIR treats potential impacts of sulfidic anoxic sediment dredging only qualitatively, without any explicit assessment of the severity or level of significance of sediment and water quality impacts in the body of the DEIR.

The DEIR provides no sediment testing data or analysis of potential impacts of dredging anoxic, sulfidic organic brackish to fresh (past seawater-influenced, sulfur-enriched) lagoon

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bed sediments. Suspension of highly reduced organic “black ooze” organic sediments of the lagoon bed has high potential for causing potentially lethal impacts to California red-legged frog tadpoles due to mobilization of toxic sulfides (hydrogen sulfide, ferrous sulfide), ammonia, and subsequent short-term water column hypoxia, and persistent aerobic formation of toxic acid sulfates and nitrates. The DEIR similarly provides no assessment of potential eutrophication impacts (excessive nutrient loading) of the lagoon due to liberation of ammonia/nitrate and phosphates from suspended anoxic dredged bed sediments. The DEIR impermissibly defers dredge sediment testing analysis and mitigation to future permit processes, as part of a programmatic rather than project-specific mitigation measure (Mitigation HY-3).

03

The DEIR also misinterprets its own hydrologic analysis report (Appendix A) in arguing that the project will not cause a change in salinity or salinity stratification within the lagoon after dredging. The DEIR correctly reports that the existing condition of the lagoon’s continuous open-water area is relatively well-mixed salinity, with little stratification. The scope of the KHE hydrology report did not include any analysis or discussion of the effects of either localized dredging (dredge-deepened pockets, heterogeneous bed depths) or widespread dredging (deeper homogeneous depths) on salinity stratification or salinity intrusion cumulative impacts with sea level rise, and do not support the arguments of “no significant cumulative impact” (p. 380) in the DEIR. The hydrology report explicitly states that the purpose of the salinity assessment was limited to assess salinity and groundwater interactions, specifically for the potential for salinity intrusion under existing conditions, using a mass balance approach:

...developed to test the hypothesis that the seasonal change in salinity was affected by shallow groundwater conditions. Given its location along the coastline, there is the potential for seawater intrusion to increase salinity and alter the habitat conditions of the system. (Appendix A, p. 18)

The hydrology report’s scope did not include analysis of did not analyze interactions or cumulative impacts of dredge-modified lagoon bathymetry and sea level rise, but it did advise – contrary to the DEIR’s conclusion of “no significant cumulative impact” of the project water quality (p. 381-382) – that rising sea level may increase long-term salinity intrusion into the lagoon under its existing regime of artificially low water surface levels maintained by pumping:

Sea level rise and climate change may also alter seasonal and long-term ocean levels and wave energy, potentially reversing shallow groundwater gradients between the lagoon and ocean and allowing more salts to migrate into the Laguna. The existing salinity and water budget models will prove to be useful tools in evaluating and quantifying potential benefits and impacts to wetlands under proposed enhancement plan alternatives. (Appendix A, p. 23; emphasis added in underline)

Unfortunately, The DEIR subsequently failed to apply the useful salinity and water budget model tools in subsequent analysis of benefits and impacts of the project on water quality. It provided absolutely no analysis or assessment of how dredging up to 60,000 cubic yards of

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sediment from the lagoon, deepening it up to several feet, would affect the stratification and trapping of high salinity pulses during salinity intrusion or storm overwash events. Salinity stratification should be predicted to increase with increased bottom relief and depth in the lagoon, since higher salinity water is denser than fresh or slightly brackish water, and local depressions would be less subject to mixing due to wind-stress current circulation in the lagoon than the existing nearly flat bed. Local dredge-deepened depressions in the lagoon would also be expected to trap fine organic sediments and have elevated water temperature due to the higher specific heat of more saline stratified water. Elevated temperatures, salinity, and organic matter in deeper depressions would be expected to increase anoxia (and hydrogen sulfide and methane gas production). The DEIR cannot cite Appendix A to address these issues because they were not within the scope of the report. These are potentially significant cumulative water quality impacts and impacts on wetland-dependent endangered species that are not assessed in the DEIR.

The DEIR also cannot rely on the findings of the original Laguna Salada conceptual restoration plan (Tetra Tech 2009) for analysis of sediment and water quality impacts of lagoon dredging because that report also failed to provide sediment testing data or impact analysis of dredging anoxic sulfidic sediments in the closed lagoon. In fact, it failed even to identify the potentially huge biogeochemical and water quality impacts of dredging and draining the lagoon. This study considered sediment quality impacts and suitability only from the perspective of re-using dredge spoils for placement on the golf course greens (Tetra Tech 2009, p. 39). Moreover, the City failed to provide sediment or water quality monitoring data from recent “maintenance” dredging episodes of small-scale Horse Stable Pond to elucidate these potential dredging-induced water quality impacts at a larger scale, commensurate with the proposed 60,000 cubic yard dredging proposal.

These omissions of sediment quality assessment for primary restoration methods that rely exclusively on dredging are unreasonable, because:

- the aquatic habitat impacts of disturbing sulfidic anoxic coastal wetland sediments (including acid sulfate soil development) have been studied worldwide for decades, and are well-known in wetland ecology (e.g., Portnoy 1991, and references within)
- Pre-dredging sediment testing is routinely required by state and federal regulatory agencies, particularly in aquatic habitats that support endangered species, so it should have been presumed to be necessary for a meaningful CEQA analysis of impacts and alternatives in an EIR;
- The San Francisco Recreation and Parks Department was notified in 2009 of this deficiency in analysis of anoxic sulfidic sediments proposed for dredging (see attached comment letter on the Sharp Park Conceptual Restoration Alternatives Report (Tetra Tech et al. 2009).

04

The DEIR specifically fails to identify, assess, avoid, or mitigate potential significant acute impacts of dredging to California red-legged frog larvae (tadpoles, the aquatic life-history phase) due to hypoxia and sulfide toxicity due to dredging-induced suspended sulfidic sediments and organic matter in the water column. The DEIR also fails to address

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overwhelming potential impacts of draining and dewatering the lagoon, a destructive method of facilitating lagoon excavation proposed in the Sharp Park Conceptual Restoration Alternatives Report (p. 45).

Because the DEIR is intended to be project-specific for Sharp Park, and is the lead CEQA document for the project, the deferral of potentially significant dredge sediment impacts and mitigation to future (CEQA responsible and trustee) regulatory agency review is inappropriate, and I believe it is also impermissible under CEQA.

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In fact, the DEIR misrepresents the factual condition of Laguna Salada's long-term sediment and vegetation changes, and the justification for dredging it to "restore" it. There is no evidence presented to support the DEIR assertion that Laguna Salada suffers from "excess sediments" rather than excessive pumping and drainage to maintain golf greens -- lowering of lagoon levels to the point at which the bottom is so shallowly flooded that tules and cattails can invade most of it. Neither the DEIR nor its supporting documents (Appendix I) identify any source of watershed sediment, field evidence of sediment deposition, sediment deposition rates, or mode of transport to deliver terrestrial sediments into the lagoon. The DEIR simply assumes that if cattails and tules are "excessive", it must be due to sedimentation. This is a fallacy. The pumps are set to maintain the lagoon water surface level at less than +7.5 ft NAVD (Tetra Tech 2009), which results in prevalence of shallow water (3 ft or less deep) across the lagoon bed. This chronic stable drawdown condition makes most of the lagoon bed suitable for progressive long-term spread by tules and cattails, even in the complete absence of any sediment deposition.

The shallowness of the lagoon controlled by the artificial water surface elevation range maintained by pump operations is sufficient to explain the multi-decade encroachment of tules and cattails. There is no direct evidence (sediment cores, bed elevation change, suspended sediment concentration measurements) presented for the hypothesis of that shallowness of the lagoon is driven by increased bed elevations cause by "excess sedimentation" in the lagoon during the period of tule and cattail growth.

The proposed dredging is not really compensating for excessive sedimentation: it is merely a way of compensating for artificially stable low lagoon water levels by lowering the bed instead of raising the lagoon to drown out or inhibit growth of tules and cattails (species with submergence tolerance up to about 4 feet). It is this fallacious, biased analysis of the lagoon's alleged "excessive sedimentation" and "excessive vegetation" problems. This fallacy is at the heart of the flaws of the alternatives analysis as well.

3. The DEIR fails to assess environmentally superior and feasible non-dredging alternatives for Sharp Park wetland and endangered species habitat enhancement and management.

The DEIR uncritically presumes that dredging is the most appropriate (least environmentally damaging) method of providing adequate depth and area of shallow open water marsh-edged wetland habitat suitable for California red-legged frog breeding. It fails to consider feasible

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environmentally superior alternatives that could achieve the same objectives. The most obvious environmentally superior feasible alternative that was ignored was modification of water level management of the lagoon, which is controlled by artificial drainage of the lagoon by pumps operated by the City. Increased water surface elevations and seasonal fluctuation of lagoon levels, combined with peripheral flood control berms that double as buffers, upland refuge, and basking habitat is a wetland habitat management/enhancement alternative that would eliminate the need for high-cost, high-impact risk engineered dredging alternatives, and would have superior environmental benefits for salinity intrusion and endangered species habitat enhancement. Artificially managing water level fluctuations in the lagoon, emulating natural lagoon hydrology, would maintain a favorable seasonal dynamic balance of shallow open water habitat (submerged aquatic vegetation, principally sago pondweed) and emergent marsh (tule, bulrush, cattail, spikerush) that is evident in the constructed GGNRA ponds at the toe of Mori Point slopes, where California red-legged frogs and tree frogs are now breeding.

Under existing conditions, there is an unnecessary conflict between lagoon wetland hydrology and upland golf drainage because there is no hydrologic separation between them. Golf fairways extend (by mowing marsh into turf) into the lagoon. Flooding of the lagoon in winter to elevations above the set upper limit of +7.5 ft NAVD that triggers pumping rapidly forms flooded seasonal wetland conditions consisting of shallow open water edged with emergent marsh vegetation – conditions that are evidently attractive for California red-legged frog egg mass deposition. (DEIR, p. 377 describes the long-term winter flooding history) The only reason these flooded wetland margins are not allowed to remain flooded for months in winter (enabling red-legged frog eggs may develop in situ with persistent flooded conditions) is because low-lying golf greens are not hydrologically separated from seasonal lagoon-edge wetlands. Consequently, the entire lagoon is pumped down to drain together both wetlands and topographically continuous golf greens, instead of draining the golf greens alone.

Construction of a low berm or levee bordering the upland side of the lagoon's wetland-upland transition zone would be a feasible alternative way of separating the flood control of golf greens and seasonally flooded lagoon wetlands that support red-legged frog breeding habitat. This would require less fill than raising all flood-prone low-lying fairways that are above the elevation of mown marsh, but would require some pumping on the landward side of the berm. A low flood control berm or levee would allow seasonal flooding along the lagoon edge to be tolerated without rapid pumping to lower the lagoon to drain golf greens. A low flood control levee, with dimensions commensurate with the 2-3 ft depth increase proposed in the dredging alternatives, would allow tolerance of higher chronic winter flooding levels at the lagoon margins, and consequently would allow a significant reduction in the frequency of pump operation. Reduction in the frequency and amplitude of rapid water level fluctuations caused by frequent pumping would therefore reduce the risk of egg mass desiccation and stranding. This alternative would require reversing the current encroachment of golf greens into seasonal wetlands: some golf greens bordering the lagoon that are subject to flooding are in fact routinely mown marsh vegetation, not turgrass (PWA 2011, and section 1 of this letter).

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A low flood control berm placed along the truly upland edge of the golf greens would reduce or eliminate the acute flooding conflicts between winter golf management and lagoon management for red-legged frog breeding. A berm would not need to encroach into wetlands at all (as the marsh mowing to expand fairways currently does), and would additionally provide burrowing mammal (ground squirrel, vole, gopher) habitats (estivation and foraging habitat) and emergent thermal refuges (basking sites) for San Francisco Garter Snakes. This may offset “need” for artificial upland fill in wetlands to provide upland refuge habitat. The soils in this infrequently flooded seasonal wetland zone are also relatively lower in sulfide content (less anoxic) and so would be more suited to excavation of shallow ponds (further hydrologically isolating them from lagoon drawdown, allowing more stable pond water levels to further enhance frog breeding habitat quality).

The DEIR failed to consider, even at a screening level, this environmentally superior alternative based on raised winter lagoon levels and low flood control berms bordering golf greens, which is a reconfigured (downsized) golf-adapted version of the comprehensive ecosystem restoration alternative proposed by PWA and others (PWA et al. 2011).

Instead, all DEIR alternatives for Sharp Park that include restoration are exclusively and arbitrarily limited to ones based on dredging potentially toxic sulfidic organic lagoon bed and marsh sediments (and minimize encroachment of golf greens) -- even in alternatives that are not “maximum recreation”. There is no valid reason given in the DEIR to exclude review of alternatives that allow for flood management to separate well-drained upland golf greens from wetlands within areas of increased lagoon water levels in the range at least +9 to +10 ft NAVD. It appears that (tacit) recreational priorities for the status quo of golf fairway boundaries are an overriding arbitrary consideration in the range of feasible alternatives.

In effect, from a perspective of wetland enhancement methods, the DEIR examines only one “restoration” alternative, one that maximizes potential water quality and sediment impact risks for federally listed California red-legged frogs, and minimize or eliminates wetland management (or recapture) of golf greens. The DEIR provides no rational basis for excluding water level management alternatives for lagoon enhancement (no screening-level CEQA explanation of alternatives considered but rejected), and merely adopts the golf-biased, technically flawed proposal of the City’s Sharp Park restoration plan (Tetra Tech 2009), which entirely neglected the issue of sediment and water quality impacts associated with sulfidic anoxic lagoon bed sediments, and also provided no sediment testing data or water quality impact analysis of dredging in endangered species habitat.

The omission of water-level management alternatives in the DEIR, and the cursory, superficial assessment of sediment and water quality impacts of dredging Laguna Salada, are particularly problematic because the San Francisco Recreation and Parks Department (SFRPD) hosted a “Sharp Park working group” composed of stakeholder advisors from Golden Gate National Recreation Area (GGNRA, National Parks Service) and San Mateo County, and other park advisors, in which the issues of sulfidic anoxic sediment impacts and water level management alternatives were explicitly discussed in November, 2010.

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(Cont.) { Furthermore, both these issues were assessed (along with field indicators of existing high sulfide lagoon sediments) in a widely circulated technical report on Laguna Salada restoration alternatives provided to the City, prepared by Philip Williams and Associates (PWA et al. 2011). The DEIR's failure to adequately address water level management that avoids potentially significant impacts of dredging sulfidic sediments is arbitrary, given its knowledge of the potential significance of the impacts and feasibility of alternatives.

06 { The mitigation measures for Laguna Salada dredging water quality impacts in the DEIR (HY-3) were as cursory and inadequate as the impact analysis: they relied on generalized programmatic, generic best management practices that do not address specific issues of dredging sulfidic lagoon bottom sediments (HY-1, BI-12). The DEIR cannot defer substantive mitigation to future mandatory permits from other agencies (BI-12a mitigation) to address the impacts caused by projects of the CEQA lead agency. The few substantive physical mitigation measures identified for sulfidic sediment dredging (such as addition of lime to dredge spoil sediment) do not address potentially significant water column and water quality impacts in the lagoon itself, which may include acute anoxia or hypoxia, acute short-term concentration of hydrogen sulfide, ferrous sulfide, and ammonia, and long-term liberation of metals (including heavy metals) and acid sulfates. The few programmatic mitigation measures for dredging are based on future dredge sediment testing without any corresponding physical actions to actually minimize impacts; they contain no contingency measures to avoid or minimize impacts if anoxic sulfidic sediments are widespread and problematic for dredging -- as should be expected from strong field indicators of widespread intensive formation of ferrous sulfide in bed sediment below surface, and rust-colored ferric oxide films at the surface of the emergent northeastern lagoon flats in summer. The rigor of mitigation feasibility assessment, like the corresponding impact analysis for water quality impacts of dredging, were grossly deficient even for an Initial Study, let alone a full project-level DEIR.

4. Summary of CEQA deficiencies and recommendations for remedies.

In summary, the DEIR:

- 01
(Cont.) { • fails to disclose fill and conversion of wetlands to uplands used not for purposes of upland habitat enhancement, but for golf recreational enhancement, and fails to assess impacts or mitigate for net fill and conversion of wetland to golf uplands.
- 05
(Cont.) { • fails to screen or analyze less environmentally damaging alternatives to dredging, such as combined water level management and perimeter flood management, to provide equivalent or environmentally superior wetland benefits;
- 02
(Cont.) { • fails to disclose the dewatering (draining) of the lagoon as a restoration construction measure proposed in Appendix I of the DEIR;
- 04
(Cont.) { • fails to analyze impacts or mitigate impacts of lagoon drainage and dewatering;

Peter R. Baye Ph.D.
Botanist, Coastal Ecologist

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Baye-1

- 06
(Cont.) {
- fails to present essential dredge sediment testing data specific to anoxic sulfidic lagoon bed sediments, and analyze sediment (and contaminant) fates and impacts in the context of the sensitive wetland and endangered species habitat, and impermissibly defers dredge sediment testing data analysis and mitigation to post-EIR permitting;
- 02
(Cont.) {
- fails to analyze sediment and water quality impacts of mobilizing sulfidic, anoxic lagoon bed sediment, and subsequent acid sulfate soil formation;
- 03
(Cont.) {
- fails to address significant potential cumulative impacts between dredging, salinity stratification, seawater intrusion, and sea level rise within the 20 year planning period.

- 04
(Cont.) {
- The DEIR consequently fails to provide adequate project-level CEQA analysis for the highly significant potential Sharp Park Restoration project impacts, and provides inadequate even for programmatic CEQA of this project.
- In my independent opinion as a professional coastal ecologist with extensive experience in management of coastal lagoon wetland ecosystems in this region, the proposed Sharp Park “restoration” project, as currently proposed, is likely to cause risks of more long-term significant environmental harm than good. Risks of long-term harm to the lagoon ecosystem and its resident endangered species would be due to inadequate planning, inadequate scientific understanding and analysis of the lagoon’s degradation, inadequate scientific peer review of project design, inadequate CEQA analysis of the impacts of the proposed “restoration” project, and inadequate CEQA analysis of feasible alternatives.
- 07 {
- The City should either recirculate the DEIR to address these issues, or it should prepare a subsequent project-specific DEIR for Sharp Park. I recommend as the most expedient and efficient CEQA process the separation of the stand-alone Sharp Park project DEIR from an otherwise consistent programmatic DEIR.

Sincerely,



Peter Baye
baye@earthlink.net

cc: California Coastal Commission, San Francisco
 Regional Water Quality Control Board, San Francisco Bay Region, Oakland
 U.S. Army Corps of Engineers, San Francisco
 Interested Parties

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Baye-1

References

Portnoy, J.W. 1991. Summer oxygen depletion in a diked New England estuary. *Estuaries* 14: 122-129

PWA (ESA- Philip Williams and Associates), P. Baye, and D. Reis. 2011. Conceptual Ecosystem Restoration and Feasibility Assessment, Laguna Salada, Pacifica, California. Report prepared for Wild Equity Institute. 211 pp.

Tetra Tech, Inc., Swaim Biological, and Nickels Golf Group. 2009. Sharp Park Restoration Alternatives Report. Prepared for San Francisco Recreation and Parks Department. 64 pp. plus appendices.

ATTACHMENT
2009 comment letter on Sharp Park Conceptual Restoration Alternatives Report
(highlighting added)



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Coastal Ecologist, Botanist
P.O. Box 65
Annapolis, California 95412



baye@earthlink.net

San Francisco Recreation and Park Commission
501 Stanyan Street
San Francisco, CA 94117

November 18, 2009

Philip Ginsburg
General Manager
San Francisco Recreation and Park Department
McLaren Lodge & Annex
501 Stanyan Street
San Francisco, CA 94117

SUBJECT: Sharp Park Conceptual Restoration Alternatives Report (Tetra Tech et al. November 2009) technical review and comments

To the San Francisco Recreation and Parks Commission and Philip Ginsburg:

Peter R. Baye Ph.D.
Botanist, Coastal Ecologist

13

San Francisco Natural Areas Plan
DEIR comments

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Baye-1

I would like to submit the following technical review comments on the Sharp Park Conceptual Restoration Alternatives Report, prepared by Tetra Tech, Karen Swaim, and Nickels Golf Group. I have reviewed the plan and its technical appendices in the very limited time (less than 2 weeks) between its public release and the Commission's pending vote on its findings. My comments reflect my independent professional judgment, and are not submitted on behalf of any organization.

My qualifications to provide expert comments on conceptual restoration alternatives for coastal wetlands are based on over 30 years of professional work in coastal wetland and terrestrial ecology, with emphasis on planning, management, and restoration of degraded coastal wetlands. Following my Ph.D. research in coastal ecology, I spent nearly twenty years as a professional technical planner and advisor on California coastal wetland restoration and management, with emphasis on recovery of rare and endangered species. I have worked for the U.S. Fish and Wildlife Service and U.S. Army Corps of Engineers in this capacity, and I have provided consulting services for California State Parks and National Park Service on coastal lagoon enhancement and restoration projects along the Central Coast during the last 5 years (Rodeo Lagoon, Crissy Field (Presidio) Lagoon, Big Lagoon, Laguna Creek Lagoon, and Pilarcitos Creek mouth).

My comments focus on what I have found to be "fatal flaw" assumptions, conclusions, and recommendations of the Sharp Park alternatives report, and equally profound errors of omission. The reports flaws, in my professional opinion, are severe enough to make the wetland conclusions and recommendations of the report unreliable and misleading for any coastal land use planning or environmental restoration planning decisions by either the City of San Francisco, or adjacent landowners (National Park Service), particularly for long-term planning.

My comments here are summarized for planning consideration, and do not represent the full extent of my critical analysis of the report.

1. Artificial pumping of Laguna Salada to achieve low water levels is highly likely to cause salinity intrusion and adverse wetland habitat conversion under a regime of accelerated sea level rise in the foreseeable future. Long-term enhancements options proposed by the report would likely fail in the long term because they ignore foreseeable long-term shifts in hydrologic baseline conditions.

The report fails to identify the significant long-term constraints of "enhancing" non-tidal seepage lagoon wetlands that are artificially pumped to low water levels relative to sea level behind a permeable sand barrier. The inevitable physical consequences of pumping the lagoon levels near or below sea level are ignored in the report, despite the, clear, explicit, and professionally responsible warnings *in its own hydrology report* that salinity intrusion due to pumping may be occurring in summer even now, and may increase as sea level rises (Appendix A, pp. 22-23). The report's discussion of salinity intrusion (p. 23) does not represent the full scope of the hydrology report's findings, and is misleading.

Peter R. Baye Ph.D.
Botanist, Coastal Ecologist

14

San Francisco Natural Areas Plan
DEIR comments

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Baye-1

08
(Cont.)

The fundamental long-term problem of lagoon pumping reversing groundwater gradients behind the sand barrier, inducing seawater intrusion (Appendix A, p. 23), cannot be overestimated. The alternative report, however, essentially disregards it. None of the intended “enhancement” benefits to wildlife species are physically possible if the long-term effects of pumping, sea level rise, and evaporative concentration of lagoon water interact to convert the wetlands from fresh-brackish to brackish-saline or even hypersaline marsh. Following this first, fundamental misstep, the report’s other long-term conclusions and recommendations about wetland enhancement are utterly unrealistic. The target species for “habitat enhancement” proposed are intolerant of persistently high salinity wetland conditions that would inevitably result from continued pumping of the lagoon to low levels as sea level rises.

The lagoon’s long-term dynamic stability will require that freshwater lagoon levels rise and equilibrate with rising sea level, to maintain positive, seaward groundwater seepage gradients that maintain freshwater marsh. This fundamental physical constraint is nowhere considered in the main text of the conceptual enhancement plan.

It is distressing that the lead authors of the report either ignored or failed to comprehend fundamental wetland hydrology in “conceptual” habitat enhancement alternatives.

2. Reliance on maintenance and upgrading the “sea wall” is incompatible with long-term wetland management.

09

All habitat enhancement alternatives assume perpetual maintenance and upgrading of the “sea wall” (rip-rap armored earthen berm capping the sand barrier beach), yet exclude highly significant environmental and economic impacts of this assumption. The report fails to address the inherently unstable long-term condition of the beach and “seawall”, and the extreme coastal erosion hazard identified for Sharp Park by the U.S. Geological Survey (http://walrus.wr.usgs.gov/el_nino/SMCO-coast-erosion/04mori_e.html) and described with emphasis by Prof. Gary Griggs of U.C. Santa Cruz in his book, *Living with the Changing California Coast* (2003). The report fails to assess the long-term significance of the 1983 storm damage to the golf course and lagoon impacts as a constraint on long-term wetland management.

Again, basic coastal processes controlling lagoon wetland ecology are ignored in the conceptual alternatives report, which treats Laguna Salada as though it were a golf course pond at an inland location. As sea level rises, the beach shoreline necessarily retreats landward. If the beach is armored with boulders, shoreline retreat will steepen the shore profile and cause passive beach erosion, and eventual failure of the beach and collapse of the seawall, causing catastrophic flooding and sedimentation of the wetlands. Beach stabilization is infeasible and futile in the long term. Thus, the golf course that depends on artificial stabilization of the beach is also infeasible in the long-term. The report ignores enhancement alternatives that realign more efficient and cost-effective flood protection designs along borders of residential development, and eliminate costly and futile investment in the

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15

San Francisco Natural Areas Plan
DEIR comments

Baye-1

09
(Cont.)

“emergency”-constructed (post-1983) seawall. Opportunities to utilize lagoon and riparian wetlands as beneficial flood and coastal storm buffers were ignored.

All coastal lagoons originate and are maintained by landward migration during sea level rise. *The Laguna Salada wetland complex’s long-term survival depends on planning for gradual landward migration of the barrier beach and its wetlands with rising sea level*, which requires geomorphic accommodation space. That space is currently displaced by the golf course, built on filled riparian wetlands of the past – the historic freshwater end of the Laguna Salada wetland complex. Rising level and a static golf course together will inevitably squeeze the existing (reduced area of) fresh-brackish wetlands out of existence, regardless of ephemeral “habitat enhancement” plan actions.

It is not feasible to stabilize the lagoon wetlands in the reduced “footprint” of the 20th century lagoon as sea level rises over three to four feet in coming decades of the 21st century. Oceanic overwash processes during extreme storms must drive the beach and its lagoon wetland complex landward as sea level rises. Any long-term wetland management plan for a backbarrier lagoon must presume upward and landward displacement of existing lagoon wetlands over multiple decades. This lagoon accommodation space (location of historic freshwater riparian wetlands) is occupied by golf links that will be subject to adverse increases in flooding and coastal storm risks.

3. The report’s design and estimated costs of the “full restoration” alternative are unrealistic, grossly inflated, and inconsistent with professional wetland restoration precedents of lagoon restoration.

10

The conceptual alternatives report arbitrarily assumes that excavated soils for “full restoration” of wetlands would require off-site disposal (p. 53). Off-site fill disposal is a principal cost factor for the full restoration alternative. The off-site disposal assumption is invalid. I have designed wetlands and provided peer review services for innumerable coastal wetland restoration plans during the last 20 years, and I know of no coastal wetland restoration plan that has made this assumption.

Only plans for the most constrained coastal wetland restoration sites consider off-site fill disposal as a last resort. Balancing cut/fill to the greatest extent possible, minimizing fill import or export to the extent feasible, is a standard planning objective for restoration feasibility. The report failed to consider beneficial re-use applications of locally excavated sediments, including obviously needed ones like flood control berms or platforms, upland/wetland and riparian transition zones, and upland refuge mounds peripheral to wetlands.

11

In addition, the report utterly neglects one of the principal constraints on dredging or excavating anoxic, organic wetland soils – excessive release of toxic sulfides, and their subsequent acid sulfate oxidation products. Failure to address sulfide and sulfate toxicity in wetland excavation can result in extreme mortality of wildlife, and inhibition of wetland revegetation. This omission adds to the strained technical credibility of the report.

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16

San Francisco Natural Areas Plan
DEIR comments

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Baye-1

12 { Furthermore, the report ignores the obvious role of golf course and residential fertilizer contamination of lagoon wetlands as a factor in overgrowth of tule marsh (reduction in open water edge).

13 { Most astonishing of all is the report's assumption (p. 48) that the lagoon should or must be *drained* in order to implement "enhancement" work. This not only technically in error, it is absurd. Amphibious excavation equipment (floating or low ground-pressure tracked vehicles) is routinely used in wetland engineering, and is the professional standard for minimizing impacts during wetland construction. Draining wetlands at Laguna Salada would cause intolerable impacts (likely including increased salinity intrusion) and is unwarranted for any reasonable enhancement alternative.

14 { The number of significant errors of omission and invalid assumptions about wetland ecology in the report suggest that the authors lack adequate experience and expertise for coastal wetland planning, and failed to solicit adequate technical peer review or supplemental consulting services to remedy technical deficiencies.

Conclusion. The Sharp Park conceptual alternatives report is fundamentally flawed as a coastal habitat planning document for both short-term and long-term conservation or land uses. The report either omits or misinterprets fundamental geomorphic and hydrologic controls of coastal lagoon wetland ecology that are essential to long-term conservation planning. The habitat enhancement recommendations in the report utilize unrealistic ecological and wetland engineering assumptions, and are likely to be infeasible in the long term. Many of the report's basic assumptions conflict with or are unsupported by the scientific literature on coastal processes, wetlands and lagoons. In my professional opinion, the report should be either set aside or subject to rigorous interdisciplinary scientific peer review, including expertise in coastal geomorphology and engineering, wetland hydrology, and ecology.

Respectfully submitted,



Peter R. Baye, Ph.D.

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Botanist, Coastal Ecologist

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17

San Francisco Natural Areas Plan
DEIR comments

Beberman-1

From: [Bill Wycko](#)
To: [Jessica Range](#)
Subject: Fw: Please don't reduce off leash dog areas
Date: 10/05/2011 09:07 AM

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/05/2011 09:07 AM -----

Gary Beberman
<gbeberman@mindspring.com>

To bill.wycko@sfgov.org
cc

10/04/2011 09:26 PM

Subject Please don't reduce off leash dog areas

Dear Mr. Wycko:

I recently learned of the draft environmental report and appreciate its objectives in protecting native plant species and endangered animals.

At the same time, I have a strong interest in retaining large DPAs. Exercising our active dog has significantly increased the amount of physical activity in our family and has helped us to appreciate the beauty of parks like McLaren and Bernal.

01 { If you are forced to restrict dogs from certain areas, I request that you add an equal or greater amount of acreage adjacent to the DPA. I also ask that dogs be permitted to play in the reservoir at McLaren.

Dogs play a vital role in the life of the city and ours does in our family. The exercise and joy she brings would be challenged if we lost access to those areas, especially McLaren.

Thank you for your attention to this and your help keeping our city beautiful.

Best wishes,

Gary Beberman
697 Douglass St.
San Francisco, CA 94114

Beemsterboer-1



Bill Wycko/CTYPLN/SFGOV

10/31/2011 09:25 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: Public Comment

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:26 AM -----



Joni Beemsterboer

<jibandgabi@sbcglobal.net>

10/29/2011 03:49 PM

To bill.wycko@sfgov.org

cc

Subject Public Comment

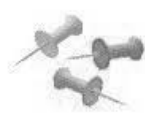
01

Please support the **maintenance alternative**-the environmentally superior option in planning for rec and park. Dog play areas, already limited will be more limited with other approaches.

Joni Beemsterboer

SF Resident and Home Owner

Besser-1



Bill Wycko/CTYPLN/SFGOV

05/16/2012 09:41 AM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc:

bcc:

Subject: Fw: Don't tear down the trees @ Mt Davidson

History:

➡ This message has been forwarded.

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 05/16/2012 09:41 AM —



kenbesser

<kenbesser@comcast.net>

05/15/2012 06:57 PM

To: bill.wycko@sfgov.org

cc:

Subject: Don't tear down the trees @ Mt Davidson

01 [

Betcher-1



Bill Wycko/CTYPLN/SFGOV

10/31/2011 04:10 PM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject: Fw: NAPEIR

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 04:10 PM —



Peter Andrew
<peterandrewsf@sbcglobal.net>

10/31/2011 03:36 PM

To: bill.wycko@sfgov.org

cc

Subject: NAPEIR

Dear Mr. Wycko,

01

I am particularly concerned that present off-leash areas available for people with dogs in San Francisco will be even more limited than they are already. For better or worse, the animal species that can continue to co-habit our planet with people are increasingly limited. For the vast majority of people who live in our urban areas, shared living experiences with dogs or cats are the only contact we have left with our fellow creatures. Dogs need to have at least some time every day when they can run free, and people need to accompany them. There's of course a down side to everything, including children playing in parks and playgrounds, disturbing others and sometimes damaging the environment a little, but we know that such activities are essential to the health, happiness and well-being of our children. We have to consider that, in the case of dogs and dog-owners, urban dwellers really have no alternatives to the parks and beaches. It is unfair and unkind to take that away. Please leave the off-leash dog areas intact.

Thank you for your consideration.

Peter Betcher
San Francisco resident, former dog-owner, lover of dogs and of our green planet

Bley-1



"Andrew Bley"
<ajbley@mindspring.com>
06/11/2012 03:37 PM

To <Bill.wycko@sfgov.org>, <Jessica.range@sfgov.org>
cc
bcc
Subject Comment regarding Natural Areas Program DEIR

Dear Mr. Wycko and Ms. Range,

Thank you for talking with me about the SF Recreation and Parks Department's Natural Areas Program DEIR. Please add my comments (below) to the document. Do you need my contact information or is "Andrew Bley, San Francisco resident" sufficient?

All the best,

Andrew

01

In regard to cutting down healthy trees, please do not proceed with the San Francisco Recreation and Parks Department's Natural Areas Program. According to the SF RPD's own outreach material, this will involve the felling of thousands of healthy trees to make way for plots of as-yet-unplanted native vegetation that will require increased use of pesticides and herbicides. The native plants have a poor chance of survival (many of SF RPD's previously planted native trees and shrubs have died before being able to take hold), the program blocks off trails and other areas of public use, and the existing trees, though non-native, are healthy, thriving, and contribute all of the benefits that large, living trees offer (urban cooling, pollution mitigation, verdant views, and more). It will take immense amounts of energy, money, effort, time, and increased pollution to move forward with the tree removal and native plantings; instead, please leave the trees standing and use just a fraction of the proposed NAP resources to maintain them. Thank you very much, Andrew Bley, San Francisco resident.

Blum-1

Ms. Jan Blum
2160 Leavenworth Street #201
San Francisco, CA 94133



By Electronic Delivery:

October 12, 2011

Mr. Bill Wycko, Environmental Review Officer, SF Planning Department

Cc: Recreation & Parks Commission:

PROSAC:

Phil Ginsburg (Rec-Park General Manager):

John Rahaim (Planning Director):

RE: SIGNIFICANT NATURAL RESOURCE AREAS MANAGEMENT PLAN (SNRAMP) DEIR

Dear Mr. Wycko:

Thank you for the opportunity to comment on the SNRAMP DEIR. This document, so vital to the continued success of the Natural Areas of San Francisco has been anticipated for many years.

It was, therefore, very disturbing to find that Sharp Park, located in in San Mateo County had been included in this long awaited document. By including Sharp Park in this document, the integrity and approval of the DEIR has been seriously compromised.

As you well know, the issues around Sharp Park's natural resources and their management are inextricably linked with multiple other issues which, to date, remain unresolved. Therefore, by including Sharp Park in the SNRAMP, the SNRAMP approval may be delayed unnecessarily, putting in jeopardy the entire management of San Francisco lands. Because the issues surrounding Sharp Park are multiple, complicated, and unresolved, the DEIR is, therefore, fatally compromised.

Some of the unresolved conflicts surrounding Sharp Park include:

- finding a legally acceptable, long term, solution to the crime of "taking" endangered species by RPD
- failure of RPD to deal with the financial losses of Sharp Park Golf Course which are being underwritten by San Francisco taxpayers even as San Mateo County has offered to help manage the Golf Course and take on certain responsibilities to alleviate the situation.
- improper redirection of limited RPD financial resources from San Francisco located RPD parks to shore up the losses of Sharp Park, in San Mateo County.
- Failure by RPD to implement sound financial restraint and management practices at Sharp Park in a way that makes it financially self-sustainable.
- Potential mis-management of taxpayer funds by taking funds from one RPD account, redirecting it to the Sharp Park Golf Course, and not reimbursing the original RPD account.
- Failure to deal adequately with the science of climate change and sea rise, how such events will continue to further negatively affect the Sharp Park property, and what those costs will

Blum-1

Ms. Jan Blum
2160 Leavenworth Street #201
San Francisco, CA 94133

04
(Cont.)

be

05

- Failure to consider the increased maintenance costs it will take to stave off sea rise which will further damage the park and the endangered species and who will pay for the increased maintenance cost
- Failure to ascertain if the citizens and taxpayers of San Francisco are willing to allow RPD to continue to redirect limited funds to continue to underwrite a failed San Mateo golf experience at the cost of shortchanging San Francisco City parks even further than they are today.

06

I urge you to withdraw this DEIR, sever the Sharp Park areas from the document and reissue the San Francisco portion for public comment so we can move forward in an ethical and forthright manner.

Thank you.



Jan Blum

Borden-1

Tom Borden
 2353 Third St.
 San Francisco, CA 94107
 Tel: 415-252-5902
 Fax: 415 252 1624
 email tom@intrinsicdevices.com

November 2, 2010

RECEIVED

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

OCT 17 2010
 CITY & COUNTY OF S.F.
 PLANNING DEPARTMENT
 M E A

Subject: NAP EIR

Dear Mr. Wycko

I was unable to attend the October 6 meeting regarding the SFRPD Natural Areas Plan environmental impact report. I do have some comments I would like to share with you.

01 { I believe the NAP has severe implications for the people of San Francisco. We live in a compact city with little access to nature. Landscaped parks are nice, but we also need access to natural areas (not capitalized). The existing NAP and the possible expansion of the Program to the Maximum Restoration Alternative would be harmful for the vast majority of San Franciscans. We need better access to the outdoors, not less. Under those alternatives, we would see more trail closures, roped off areas and herbicide spraying, reducing the access to wild areas we enjoy today.

02 { The Maintenance Alternative is the best choice. It has the least environmental impact and minimizes resources spent on the Sisyphean battle against invasive species. It is better that we be able to hike, run and bike in natural areas composed largely of invasive species than to create expanded Natural Areas where native plants are defended from people and invasive species at great cost. The Proposed Project and Maximum Restoration alternatives go too far.

01 (Cont.) { Those plans focus too much on trying to keep people out of the Natural Areas by removing the attractions that draw them there. There are three manifestations to this, closing popular social trails, trying to prohibit bicyclists from using the trails, and making the areas off limits to people walking dogs off-leash. I strongly disagree with the first two. As for dogs, they are destructive when walkers allow them to dig up the ground and it is all too common to find plastic bags of dog poop left trailside.

03 { Natural Areas desire to close narrow social trails is misguided. (page 256 DEIR) The narrow foot tread social trails are generally sustainable from an erosion viewpoint and those that exist are the result of a long evolutionary process. Granted, they are unsafe when compared to a smooth paved trail in Golden Gate Park, but tame compared to any trail in the Sierra Nevada. The web of social trails offers up a much more engaging outdoor experience than the "channelized" trails the NAP has in store for us. For the same square footage of disturbed surface, the narrow social trails can accommodate many more users having their own nature experience than the broad bland trails

Borden-1

03
(Cont.)

envisioned. The closure of these social trails will have much more than a "less than significant impact".

It is interesting to note the nicest sections of the Philosophers Walk route in McLaren Park were chosen to run on social trails. SFRPD Natural Areas has already closed several key social trails in McLaren Park, two of these were heavily used and at sustainable grades. Both were subsequently reopened by social traffic.

04

In Glen Canyon, Natural Areas closed the only trail that enters the park from O'Shaughnessy Blvd., cutting off access for all of the neighborhoods west of the park. That trail started near the end of Del Vale Ave. and dropped down to the Silver Tree day camp facility. The closest entry points to the park are now at Turquoise Way or at Bosworth Street. This is a clear example of how implementation of the NAP has physically divided an existing community. See LU-1 on page 177 of the DEIR.

05

Natural Areas singles out bicycle riders as a problem. However, the insistence that people not be allowed to ride bicycles on trails in Natural Areas is not based on any sound logic. Cyclists are much more likely to stay on trail than pedestrians. When people stay on trail, no damage is done to the sensitive habitat the trail runs through. (There are trails in Glen Canyon where bicycle use is inappropriate due to heavy use by hikers and dog walkers, combined with trails that are marginally sustainable.)

I question a couple of conclusions of the EIR.

06

I question the EIR's statement the impact of tree cutting on wind will be less than significant for all project alternatives. It will come down to which specific trees Natural Areas decides to cut.

07

I question the EIR's statement the impact of herbicide use will be less than significant for all project alternatives. If people and animals pass through areas that have recently been sprayed with herbicides, is it safe? Natural Areas already does a lot of herbicide application. I frequently pass through such areas.

I think we should try to preserve the vestiges of the City's natural heritage, but we should not set aside large portions of our park land as nature preserves where only limited "passive" human use is allowed.

I serve on the board of SF Urban Riders and am an active participant in the McLaren Park Collaborative.

Sincerely,



Tom Borden

Bors-1

785 Carolina Street
San Francisco, CA 94107
September 26, 2011

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

re: SNRAMP - DEIR

Dear Mr. Wycko,

I am writing to comment on the DEIR for the San Francisco Natural Resource Areas Management Plan, SNRAMP. Please do not send me paper copies or CDs of any material. The Planning Department's website is comprehensive. I am a long time resident of San Francisco and have volunteered with the Natural Areas Program since its inception, particularly at Bayview Park.

01

Overall I feel the SNRAMP has been well prepared for the 31 natural areas within San Francisco. The Bayview Park section of the Plan, with which I am most familiar, is very well done and thoroughly covers all aspects involved in managing the natural resources of the area. I am pleased with the progress that has already been made there following SNRAMP guidelines. One personal thought, a short natural wildlife corridor and trail between Bayview Hill and Candlestick Point SRA might be mentioned as a future possibility. For both parks it would benefit wildlife and offer additional recreational opportunities.

02

03

I feel that Sharp Park's location and unique problems make it quite different from the natural areas in San Francisco. It is very controversial with too many unanswered questions. I am concerned that approving the DEIR as is could lock Sharp Park into an unfortunate uncertain future. On the other hand, I do not want to delay approval of the SNRAMP for the 31 natural areas within San Francisco where I feel the SNRAMP does a very good job. I feel that Sharp Park should be separated from the SNRAMP and the SNRAMP DEIR should be approved for the 31 natural areas within San Francisco without further delay.

Sincerely,



Margo Bors

Bose-1

**Bill Wycko/CTYPLN/SFGOV**

10/24/2011 01:12 PM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject: Fw: Comments on Draft EIR on the SNRAMP

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/24/2011 01:12 PM —

**Rk Bose**

<fk94131@yahoo.com>

10/24/2011 01:12 PM

Please respond to
Rk Bose
<fk94131@yahoo.com>

To: "bill.wycko@sfgov.org" <bill.wycko@sfgov.org>

cc

Subject: Comments on Draft EIR on the SNRAMP

Dear Mr Wycko,

I am writing with my comments on the Draft Environmental Impact Report on the SNRAMP.

The report has some significant errors of fact that should be corrected.

- 01 { 1. Page 2, Section 1B: It's the Maintenance Alternative. that was determined to be the Environmentally Superior Alternative on Page 526.
- 02 { 2. Pg 319: Mission Blue Butterfly occurs at Twin Peaks and Sharp Park.. The species is not recorded to occur at Sharp Park within the last decade. However, reintroduction is being attempted at Twin Peaks. (See also point #9 below.)
- 03 { 3. Pg 365: Garlon degrades quickly in the environment and has low toxicity to aquatic Species.. This is not true of Garlon 4 Ultra, which is what the NAP has been using in the Natural Areas. What the Dow MSDS actually says is, Material is expected to degrade only very slowly (in the environment). Fails to pass OECD/EEC tests for ready biodegradability.. It also says it is ..highly toxic to aquatic organisms..
- 04 { 4. Pg 457: The DEIR cites an irrelevant study showing that grasslands reflect more sunlight in northern latitudes above 50 degrees north. Since this does not apply to any part of the US but Alaska, it is misleading.
- 05 { 5. Pg 457: Grasslands as a significant carbon sink.. Compared with what? The cited study compares badly managed agricultural land to better-managed pasture (with the single most important factor being fertilizer addition). Since the comparison here is with land covered with trees, the study is again irrelevant to this EIR. Cutting down trees and substituting grassland and scrub will inevitably reduce carbon sequestration. There has been no attempt to quantify the loss of sequestered carbon from the Proposed Project or

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- 05 (Cont.) { any of the alternatives, though clearly with thousands of trees scheduled for destruction the impact would be considerable.
- 06 { 6. Pg. 192–193: Pictures purporting to show the .before. and .after. effects of tree removal are the same pictures with superimposed red ovals. This cannot be considered a good–faith effort to show the impact of tree removal.
- 07 { 7. Pg 466: .Feral geese.. The geese in San Francisco, including the ubiquitous Canada Geese, are not feral (meaning domesticated animals living in the wild). They are authentic wild geese and as such are protected species.
- 08 { 8. Throughout the DEIR, the term .invasive. is used repeatedly as a pejorative, without any definition, and without any parameters for establishing whether a particular species is actually invasive at that location. In particular, there is no evidence that the eucalyptus and Monterey pine/ cypress scheduled for removal have in any way invaded the landscapes they are in. They were planted there.
- 09 { In fact, the research elsewhere in the Bay Area actually shows that these forests are declining, not invading. In .Vegetation Change and Fire Hazard in the San Francisco Bay Area Open Spaces,. William Russell (USGS) and Joe McBride (UC Berkeley) used aerial photos of Bay Area parks taken over a 60 year period from 1939 to 1997, to study changes in vegetation types. They studied photos of 3 parks in the East Bay (Chabot, Tilden, Redwood), 2 parks in the North Bay (Pt Reyes, Bolinas Ridge), and one on the Peninsula (Skyline). These photos revealed that grasslands are succeeding to shrubland, dominated by native coyote brush and manzanita. Eucalyptus and Monterey pine forests actually decreased during the period of study, and thus cannot be considered .invasive..
- 10 { 9. pg 115, Pg 294: Bayview Park is described as Mission Blue Butterfly habitat, without any evidence. Within the last decade, the butterfly has only been recorded at Twin Peaks. In very recent times, this is the result of importing dozens of them from San Bruno, where they do occur naturally. (The butterfly is also said to occur at Sharp Park, but again no evidence is provided.) Since this species depends on unstable .disclimax. habitat, only recent sightings would be relevant as the vegetation would change through natural succession. Attempts to create a habitat for this species would mean constant intervention to plant and then maintain disclimax habitats.
- 10 { 10. Pg 92: The DEIR notes that the trees removed would be replaced one–for–one. This is impossible on several counts:
 (a) The SNRAMP does not have any plan for tree–planting, only for conversion to grass and shrubland.
 (b) Given that a .tree. is defined as greater than 15 feet in height, the .trees. that will be planted would actually be .seedlings. or .saplings. by the definitions used in this report. Since the SNRAMP plans to remove an uncounted number of seedlings and saplings in addition to the 18,500 .trees. over 15 feet in height . replacement is clearly not feasible.

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(Cont.)

(c) The majority of the trees would be removed in Sharp Park, where windthrow is acknowledged to be a factor. This implies that the actual trees lost would exceed the 18,500 number, and replacing them is essentially impossible.

11

11. Pg. 195: ..all removed vegetation would be replaced with native vegetation that is more appropriate for the area's precipitation pattern, water availability, animal populations, and local ecosystems, thereby allowing the new vegetation to thrive more successfully than the invasive vegetation..

This statement is self-contradictory. If the .invasive vegetation. is not thriving more successfully than other vegetation, it is not invasive. Moreover, there is practical evidence that .native vegetation. does not in fact .thrive more successfully. but instead requires irrigation to get established, followed by continuing maintenance in the form of herbicides and replanting. The rising use of herbicides by the NAP attests to this, as do the thousands of volunteer-hours it uses for maintenance.

12

12. Pg 365: .Pesticides would be used as infrequently as possible in the Natural Areas to achieve the desired results..

The DEIR is vague about the amounts of pesticide to be used, and in what situations. .Desired results. being an undefined object, this statement may be used to justify anything. Given the NAP's record of sharply increasing pesticide use, we think it should specify the expected amounts to be used under each of the options . both the Proposed Project and the Alternatives. (NAP's Garlon application increased from 16 times in 2009 to 36 times in 2010; Glyphosate was used 7 times in 2009 but 42 times in 2010.) Quite aside from any herbicides associated with Native Plant introductions, we would expect a sharp increase in toxic pesticide use owing to tree-felling. It is important to quantify these to assess Environmental Impact.

13

13. p 365: .Pesticide use would be carefully monitored, would involve the use of least toxic methods and materials that are appropriate to the environment in which they are applied, and would adhere to the IPM Program..

A large number of violations of the IPM by NAP have been brought to our attention in the last two years: applications of Garlon by spraying instead of daubing; no respirators worn when working with chemicals requiring them; no dates on application notices; use of unauthorized pesticides; pesticides used at unauthorized locations (e.g. glyphosate used near red-legged frog habitat).

(Some of these are shown on our website at <http://sutroforest.com/2011/10/02/san-francisco-natural-areas-pesticide-violations/>) In addition, the NAP has been routinely using pesticides classified by San Francisco's Department of the Environment as Tier I or Tier II, so .least toxic. is a meaningless descriptor in the context. They are using chemicals that are as toxic as they are permitted

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(Cont.)

to use.

In view of this use and these incidents , and these are only the ones we ran across or were shown , the DEIR's assertion of .careful monitoring. and compliance seems excessively sanguine. Violations seem to be unnoticed, ignored or .regularized. post facto. We would like to see concrete measures of oversight from a neutral person or board.

14

14. The .Maintenance Alternative. appears to be the most rational option:

- the Environmentally Superior alternative;
- lower investment of time and money required;
- lowered requirement for pesticides compared to the Proposed Project;
- and in terms of potential outcomes that are aesthetically pleasing and ecologically viable.

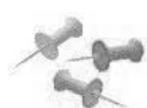
Other than an irrational preference for .Native. species without reference to ecological function, the Proposed Project has no apparent advantage over the Maintenance Alternative.

Thank you for the opportunity to provide comments on this EIR draft.

Sincerely,

Rupa Bose, (fk94131@yahoo.com)

Bose-2

**Bill Wycko/CTYPLN/SFGOV**

06/11/2012 12:41 PM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc:

bcc:

Subject: Fw: Comment on SNRAMP DEIR: Use of "basal area"

History:

This message has been forwarded.

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 06/11/2012 12:41 PM —

**Rk Bose**

<fk94131@yahoo.com>

06/11/2012 11:06 AM

Please respond to

Rk Bose

<fk94131@yahoo.com>

To: "bill.wycko@sfgov.org" <bill.wycko@sfgov.org>

cc:

Subject: Comment on SNRAMP DEIR: Use of "basal area"

Dear Mr Wycko,

This is a further comment on the Draft Environmental Impact Report on the SNRAMP.

The language around the issue of tree removal is extremely confusing to the lay-person.

1. Two separate measures are used: The height of the tree, and "basal area."

Tree height is intuitive and easily understood. For the purposes of the SNRAMP (and the DEIR) a "tree" is defined as a plant with a single stem exceeding 15 feet in height.

However, the determination of extent of tree removal in the DEIR is worded in terms of "basal area."

01

This term is never properly explained, either in the SNRAMP or in the DEIR, nor is the public given the formula in summary. This forces the public to make their own calculations and estimates, and impairs their ability to properly assess impacts.

2. "Basal area" also appears to be a poor choice as a measure.

(a) There is no easy equivalence between basal area and the measures the public finds more familiar: number of trees per acre, tree height, canopy cover.

(b) According to US Forest Service, this is the definition of Basal Area:

"Basal area (BA) is the area of the cross section of a tree stem, including the bark, measured at breast height (4.5 feet above the ground)."

[<http://www.fs.fed.us/postfirevegcondition/glossary.shtml>]

Bose-2

- 01
(Cont.) { "Basal area per acre" is therefore the number of square feet of basal area of all the trees in one acre.
- Using a fixed basal area per acre target suggests that as trees grow larger, more will be felled. This is the opposite of what good management would suggest when San Francisco is seeking to increase its urban forest cover.
- (c) "Basal Area" does not consider the size or spread of branches or canopy. The canopy is an important determinant in a tree's pollution-fighting ability by trapping pollutants on its leaves. It also is critical to its ability to slow water impacts and run-offs by mediating rain-fall. The canopy is important from a wildlife standpoint. Finally, a tree's canopy also affects its aesthetics.
- 02 { The final EIR should explicitly discuss the impact of tree felling in each specific area.
Thank you for the opportunity to comment.
- Sincerely,
- Rupa Bose

Bowling-1



Bill Wycko/CTYPLN/SFGOV

10/31/2011 09:06 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: SNRAMP comment

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:06 AM -----



Alane Bowling

<abowlinglane@gmail.com>

10/31/2011 08:52 AM

To Bill Wycko <bill.wycko@sfgov.org>

cc

Subject SNRAMP comment

Mr. Bill Wycko

Environmental Review Officer

San Francisco Planning Department

1650 Mission Street, Suite 400

San Francisco, CA 94103

Dear Mr. Wycko:

I have been a volunteer with the Natural Areas Program since 2004, doing habitat restoration on Bayview Hill and in the Oak Woodlands of Golden Gate Park. I am also a street park steward through Nature in the City and the San Francisco Parks' Trust. I've stewarded two small gardens on Department of Public Works' land, helping to establish a natural habitat corridor between two Green Hairstreak butterfly populations in my neighborhood. I own a home in the Inner Sunset and neighbors have been supportive of this effort because it is beautifying the area as well as providing butterfly habitat.

01

I support the Significant Natural Resource Area Management Plan because so much thought, research, and preparation has gone into it. I believe that the Draft Environmental Impact Report for the Natural Areas Management Plan is an adequate, accurate, and complete review of the plan based on detailed studies by scientific experts. It proposes mitigation measures to address any possible adverse effects, and it is consistent with several directives, including the Recreation

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(Cont.)

and Open Space Element, the Public Utilities Commission's water-saving mandates, and the City's Sustainability Plan. It looks at alternatives and discusses the potential effects for both the natural and recreational amenities of the City's Natural Areas as well as potential effects on the City's resources.

I believe that implementation of the Plan will help prevent the local extinction of plants and animals, improve habitat for wildlife, increase safety, and improve access and recreational use in Natural Areas. The Plan is the most cost-effective method for managing our resources and protecting these areas for future generations. It provides clear direction to the City on how to prioritize management and restoration of our Natural Areas, and it presents an innovative way to safeguard our City's Natural Areas. This is very important to me, all San Franciscans, and for future generations of San Franciscans.

As you know, the mission of the plan is to provide guidelines and amenities for passive recreational uses compatible with natural resources, to identify the causes of adverse effects on habitats, to enhance biological diversity, and to maintain populations of sensitive species. It also aims to inventory the biological resources in our Natural Areas to provide background information for planning, restoration, and management activities; to develop a Geographic Information System database, containing baseline information for each of the Natural Areas; and finally, to provide guidelines for educational, research, and stewardship programs. These are all commendable goals and attainable with the Significant Natural Resource Area Management Plan to guide us.

02

If we have to separate Sharp Park from the rest of the Natural Areas Plan in order to move forward, although not my preferred approach, please, let's do that and make some progress for our City.

Thank you for your support,

Ms. Alane Bowling

2227 15th Avenue

San Francisco, CA 94116

abowlinglane@gmail.com

Bowman-1

**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 04:37 PM

To Jessica Range/CTYPLN/SFGOV@sfgov

cc

bcc

Subject Fw: NAP EIR Public Comment

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 04:38 PM -----

**Amita Bowman**

<amitabowman@hotmail.com>

>

10/31/2011 04:38 PM

To <bill.wycko@sfgov.org>

cc

Subject NAP EIR Public Comment

01 I am a frequent visitor with my family and dog to Sharp Park, McLaren, Lake Merced, Golden Gate, and Glen Canyon. In addition, my step daughter lives in San Francisco and my elderly in-laws have lived in the Richmond District for over 40 years. While I live in San Bruno, almost everything I do is in San Francisco so I very feel a part of the San Francisco community. I support the Maintenance Alternative or the Recreation Alternative. San Francisco city-managed parks are landmarks and part of our communities' identities and health and well-being. Preserving existing native plant communities should be supported but that should not include restoring 1/3 of our small parklands to native plants and displacing recreation and our existing landscape and nature.

02 Only in extreme cases should the Parks & Rec Dept defer from McLaren's policy of NO "Keep off the grass" signs. These are city parks and are not major environmental conservation areas; plus
03 non-native trees are part of our planted landscape and should be celebrated not demonized. I am also quite concerned about cutting 25% of park trails and the increased use of toxic pesticides that has an impact on almost every potential user of the parks.

Sharp Park Aesthetics/Land Use:

04 The EIR does not account for the significant impact on the aesthetics and land use at Sharp Park. I often talk to people that have been going there for 30 some years, and the berm is definitely as much of the historic value of the Sharp Park as the golf course. The fence is ugly and creates a psychological barrier between the people on the berm and the golf course that completely changes the aesthetics for the hundreds of people that walk along the berm each day. This change is not even recognized as such in the EIR.

As a frequent walker and runner with my dog and family at Sharp Park, I am quite concerned about the ugly fence that was installed, the potential of a permanent barrier, and prohibiting people and dogs from the lagoon. Before the addition of the ugly fencing along the berm, the lagoon was a favorite end to our runs and a lovely quiet magical place. As I heard the commissioner talking about keeping the 18th hole for the

Bowman-1

golfers, I realized that the lagoon was the equivalent of the 18th hole for the hundreds of people including children, the disabled, senior, minorities, every income group, etc. that share and walk the berm each day. It's the stop along the way where one typically meets one or two other people and stops for a chat, which really makes me feel like part of the community.

05 { In addition, I've lived in the Bay Area for about 15 years, and I've never been on a golf course here. However, I fully support that Sharp Park is an historic course that is lovely for even those of us that don't golf. Before the addition of the ugly fencing along the berm, the golf course always felt like it was for everyone to enjoy. I don't golf but I love looking at the ocean for a while, looking at the lagoon for a while, and then the green, green of the golf course and the happy people playing. For me, it is a wonderful combination; the ugly fence and any future barrier destroys the aesthetics of the golf course. John McLaren had the philosophy that there should be NO "Keep Off the Grass" signs, which is a brilliant philosophy that makes our parks inviting and us part of the parks and the nature in the parks.

Unfortunately, the people on the berm, which represents the largest group of users for Sharp Park, doesn't have any organization to represent their interest and are thus being ignored; plus they are trusting that government official are considering their interests instead of just small special interest groups such as the native plant extremists. For Sharp Park and all the other parks, I don't see any attempt to survey users of the parks to understand their perspective on the value of the changes or how those changes impact the historic, aesthetic or recreational value of the area. Real people that use these parks need to have input into the process.

Dogs are Not Invasive and are not Merely a Nuisance

06 { **The EIR does not address the significant precedence of the NAP labeling dogs as an "invasive" nuisance and how that impacts the likelihood of daily recreation being reduced for at least 30% of the San Francisco population and visitors with dogs. If the NAP allows for reducing usage by people with dogs then the maximum reduction should be evaluated and presented in the plan. Reducing the usage by such a large population is certainly a significant impact on recreation as well as on the health and safety of people and dogs. A well-exercised and socialized dog is a safe dog, and these dog play areas are critical for providing the space needed for exercising and socializing dogs. In addition, these areas are important for people to socialize and exercise as well.**

The EIR and the NAP treat dogs as an "invasive" nuisance with no value. Dogs were the only domestic animal in pre-Columbian times, and the dogs we have today are the same species as in pre-Columbian times. Based on the way that "invasive" is used in the EIR/NAP, dogs should not be referred to as an invasive. In pre-Columbian times, free roaming dogs would have been as integral a part of the nature in these parks as ravens, bobcats, mountain lions, black bears, grizzlies, hawks, etc. Granted there are more dogs today because of the larger human population but those dogs aren't out scavenging and

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hunting for their daily meals, so theoretically, it is unlikely the dogs today have a greater impact on local nature than 250 years ago. In addition, the dogs are under the supervision of owners which significant changes the impact of a single dog on the environment in comparison to self-reliant, free-roaming dog.

07 { This plan seems to give NAP free-will to exclude people with dogs based on “observations” and “mays” than can be used arbitrarily. For example, the claim is that dogs are causing erosion at Lake Merced and thus dog play areas should be closed. In truth, dog have almost no impact on Lake Merced because few dogs use the area. The fact that a dog play area is there is almost hidden, and the dog play area signage is non-existent in the park; in fact, all the signs I see around the park indicate dogs on-leash only. While the area isn’t currently being used, the NAP will assure that it can never become a dog play area.

08 { As another example, the city has attempted to exclude people and dogs from the lagoon at Sharp Park, where people have gone for generations. In Issue SP-8, NAP claims dogs “may” have an impact on the SF Garter Snake and the California Red Legged Frog and that is sufficient to exclude people with dogs. However, there is no concrete evidence that dogs are having any impact on either species or their populations, even at these sites. Collectors seem to be the biggest known impact at the site.

The extremists in the environmental community are coming up with these “mays” and acting as they are proven facts and aren’t actually scientifically studying the issue. People with dogs are being treated as if they are a member of the community that is merely a nuisance and does not matter. It only takes accusations, on par with those used during the Salem witch hunts, for all dogs and their people to be convicted and expelled. The city and NAP are not even questioning whether the SF Garter Snake (SFGS) is indeed a unique sub-species. In looking at the information on the SFGS, I find it questionable that DNA analyze has not been performed and the population of SFGS isn’t even known or estimated. If recreation was a priority, NAP would ensure that valuable resources are truly being dedicated to the preservation of an endangered species and not just being used to high-jack recreational areas.

Personally, I’m suspicious that the SFGS is being used as a decoy to camouflage those that want the lagoon to be a bird sanctuary like all the other bird sanctuaries around the Bay Area. For the zealots that theorize that dogs have a significant impact on the shorebird populations, they should be supporting dogs in and around the lagoon since the shorebirds are real predators of both the snakes and the frogs and their young. If the city truly wants to encourage the snakes and frogs then there should be programs to deter the shorebirds. Note I’m not proposing that approach but believe the current stance is hypocritical and shows extreme bias and sets an unhealthy precedence.

09 { **Prioritization Precedence**
The EIR does not address the precedence of prioritizing native plant restoration over

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recreation and increasing green space. The opportunity cost of these plans is not evaluated.

This plan prioritizes unsustainable native plant restoration over humans. While native plants do provide recreation for people that enjoy gardening in the parks and has value in preserving special status plants and wildlife, the scale of this program is overwhelming for the benefits. More than 1/3 of the little parklands in SF cannot become like a museum, not to be touched by anyone but a select few. Fortunately or unfortunately, SF has little open space and dense housing, and there is little likelihood of changing that. In some ways, it is good that people stack into a small housing area and then share open space instead of spreading out and taking up more open space in suburbs.

09

In addition, the plan does not address areas such as Bernal Hill that has little green year around, and this plan is unlikely to result in the addition of aesthetically pleasing trees that would add to the character and charm of the park. Predominately brown native grass and even attempts to establish native trees are unlikely to significantly improve the aesthetic beauty of the park as non-native trees would. This plans prevents beautifying these parks for the community.

The plan also does not account for the expansion of endangered species and that can permanently remove land from ever being available for other purposes in the future. From what I understand, endangered status is not just related to the actual population of a species but also the number of sites. SF has no control on expanding sites so even if a species flourishes in these SF sites; the species are unlikely to be removed from the endangered species list. For example, the California Red Legged is common on the coast; it is the populations in the Sierras that are an issue. No matter how well the frogs do in SF city parks, the frog is unlikely to be taken off the endangered list.

10

In addition, the NAP is not free. Just removing and replanting some 15,000 trees in Sharp Park has to be a significant cost and yet no financial information is provided. I am personally quite appalled that large amounts of time and money are spent on removing healthy trees and vegetation when toilets are non-existent (e.g. Stern Grove) or badly maintained (e.g. Lake Merced), and the city is cutting other critical services. No plan should be complete without a financial analysis to evaluate the opportunity costs.

Toxic Pesticides/Herbicides

11

The amount of toxic chemicals being used on existing natural area restorations needs to be comprehensively evaluated, and this should be done for as many years as information is available.

The use of toxic pesticides and herbicides is increasing with the native plant projects, and I cannot find recent information on the amount of these that are actually being used for the current projects. The use of toxic chemicals to control invasive plants not only impacts wildlife and people's health but is also a major aesthetic impact for me. I

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always love finding blackberries in season and having a snack. Now I'm looking at the park quite differently and wondering about what I, my family, or my dog is walking on and touching that may be sprayed with poisons. I particularly worry about the toddlers and other small animals and beings in our parks.

Air Quality

Air quality needs to be quantitatively reviewed for the removal of trees and limbs and for the suppression of replacement growth and underbrush instead of just presenting abstract information.

12

I cannot find a comprehensive analysis on carbon dioxide absorption from converting large areas of land from forest to grasslands/scrub. Cutting 18,500 trees is only a small part of the conversion since the actual goal is to slowly convert these areas to grassland/scrub. Just because the conversion is slow does not negate the fact that large areas, particularly in Sharp Park, will soon be almost devoid of trees and all the under canopy / vegetation that exists today. From what I can see, it appears that more 50% of the forest area is planned to be converted slowly to scrub and grassland just like what predominates most of San Mateo county and the nearby area.

Wildlife/Nature/Visitor Experience

13

The success of the NAP existing restorations should be evaluated and incorporated into the EIR. In additions to studying the actual changes in vegetation and wildlife, the studies should include evaluating how the public perceives the changes. As an example, I loved Pine Lake the way it was before the fences and the de-vegetation of the area, and I would express that in a survey. I personally feel the Glen Canyon and Sharp Park forests could do with some trimming but find them magical oasis and expect others find them equally unique and special. I equally appreciate the more manicured parks or the vast open spaces up and down the coast that are pre-dominated by coastal scrub like that being promoted. However, I believe the current balance of these areas is appropriate and does not warrant major changes.

I cannot find a comprehensive analysis showing that actual monitoring of wildlife in the Sharp Park forested/eucalyptus areas versus the scrub/grassland areas. The analysis seems to be completely speculative. One would expect to see the actual monitoring that has occurred that actually demonstrates that more wildlife is supported by native vegetation than by the non-native plants.

Based on my extensive experience in hiking in the Bay Areas, I do not perceive a significant difference. The places I see the least nature is places like Pine Lake with the restoration areas. The slopes at Pine Lake feel barren with the attempted replant and the harshly trimmed trees. My impression is there is far less vegetation mass, insects, and birds in the restoration areas than in the areas that have not been restored. By attempting to convert slowly so the public doesn't realize what is happenings, means the shade prevents the scrub from taking hold, and it is a no win situation. My feeling is

Bowman-1

there should be museum like areas that are dedicated to native plants, and not just trying to take a 1/3 of the park without people realizing and attempting this change in the balance of native to non-native plants.

Removing these planted urban forests cannot be quickly reversed, particularly with the trees that are over 50 years old and should not be done without the full understanding and commitment from the community. I was quite surprised to learn that these trees and underbrush were not being removed for safety or for aesthetic reasons and that the real justification is a costly attempt to restore native plants in areas that prior generations deliberately and successfully planted beautiful trees. I don't believe most people in SF would support turning large areas into savanna like the often brown San Bruno Mountain; particularly without a compelling safety justification or improvement in quality of life. Instead 25% of trails and 15% dog play areas are being closed, reducing the quality of life for most residents.

Native Nuisances

14

NAP does not address monitoring of native species and maintaining the balance of these species. Any species whether it be native (e.g., sea gulls, ravens, shorebirds, scrub, etc.) or non-native can become a problem for other species survival. I cannot find where the plan addresses monitoring and addressing native species, other than non-natives, that over-populate and threaten other species. This over-focus on "native" could be damaging to our current ecosystems and species.

Sincerely,
 Arnita Bowman
 2130 Crestmoor Dr
 San Bruno, CA 94066

Bowman-2

**Bill Wycko/CTYPLN/SFGOV**

06/11/2012 05:15 PM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc:

bcc:

Subject: Fw: Public Comment Regarding SNRAMP DEIR 2005.0912E - Part 1

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 06/11/2012 05:15 PM —

**Amita Bowman**

<amitabowman@hotmail.com>

>

06/11/2012 04:46 PM

To: <bill.wycko@sfgov.org>

cc:

Subject: Public Comment Regarding SNRAMP DEIR 2005.0912E - Part 1

Dear Mr. Wycko:

This is an additional public comment from me regarding the Draft Environmental Impact Report (DEIR) for the Significant Natural Resources Area Management Plan (SNRAMP) and a request for additional revisions to the DEIR. I have also read the Public Comments on the DEIR submitted by the San Francisco Forest Alliance (SFFA) and request that RPD address the revisions requested by SFFA.

This is summarized list of the revisions requested in the detailed justification document attached:

Section 1. Table 5 - Summary of Natural Areas Management Plan

- 01 { 1. Correct the distances for Existing Trails and To Close/Relocate Trails
- 02 { 2. Add a summary of urban forest acres to be converted long term to coastal scrub and grassland
- 06 { 3. Correct the "existing" trees and clarify impact of trees removed since initiation of SNRAMP
- 07 { 4. Clarify plans for reforestation and types of trees used for reforestation

Section 2. Table I - Summary of Environmental Effects - Recreation

- 08 { 1. Change all recreation environmental impact statements to Significant for Proposed Project, Maximum Restoration and No Project to reflect the significance of the proposed plan and the current Natural Areas Program management on park visitors. Consider Conducting an unbiased survey of Natural Areas visitors to determine the significance of decommissioning trails, removing park greenery (aka Trees, ivy, etc.), restricting visitors to trails, removing park benches, dosing dog play areas, spraying herbicides, etc. on visitor experience and use of the parks.

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- 11 { 2. Evaluate the environmental impacts on public health related to discouraging daily exercise and recreation and on the changes to air quality for those exercising in the parks.

- 14 { **Section 3. III.A.1 Background**
Clarify in the DEIR that most of the “Natural Areas” are predominately non-native plants and trees and not remnant or sensitive habitat. Most of the Natural Areas are planted forests and old livestock pastures that SNRAMP plans to convert to native coastal dunes, scrub, and grassland to treat as conservation areas instead of recreational areas. The statement “The Natural Areas Program mission is to preserve, restore, and enhance the remnant Natural Areas and to promote environmental stewardship of these areas” is incomplete without incorporating the current land use and type of land.

Because of the size of the files, I will be sending additional emails with the attachments noted in the above sections.

- 15 { In general, I found the DEIR to be biased towards promoting the SNRAMP proposals instead of impartially and scientifically presenting the environmental impacts of the program. It is troubling that RPD spent more than \$1 million for the development of such a flawed SNRAMP and DEIR and that this was done with limited input from the general public who are unlikely to support the costly implementation or the significant changes to the use of 25% of park land in SF. RPD continually misuses words like “invasive” and “noxious” instead of the more clearly understood “non-native plants” which misleads the public about the types of plants and trees to be removed. RPD also uses “nature” and “natural” and “habitat” which would be more correctly stated as “native plants”. Using these marketing words or codes represents a deceptive tactic that undermines the value of the entire DEIR public comment and review process, since the general public is not being made aware of the significance of what is actually planned.

- 16 { In addition, RPD continues to marginalize the extent of the plans in the media, on their website, and in presentations and even propagates myths particularly about eucalyptus being different from other trees (e.g., nothing growing under eucalyptus, fire hazards, hazardous from tree/limbs falling, killing birds, etc.). They also talk about the myth that non-native plants and trees are not used by wildlife in the parks or that nothing grows in a eucalyptus forest, one visit to a Bay Area forest that isn't intensely managed shows the falseness of this claim. RPD has also made almost no effort to proactively inform the general public of this significant project that changes the land use of highly valued parks from neighborhood parks to “sensitive habitat”. This change of the land use to conservation will significantly change the visitors’ experience. As identified by SFFA, few residents are aware of the proposed plan even though the plan will impact the more than 60% of people that say they use trails in SF parks.

- 17 { It is also disturbing that RPD has proceeded with implementing much of the SNRAMP plans prior to the completion of the DEIR, which doesn’t seem to comply with CEQA. For example, 1) signs are already posted at the Natural Area entrances calling the entire Natural Area “sensitive

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(Cont.)

habitat” and requiring visitors to “stay on the designated trails” and 2) the 2008 Park Bond Trail Restoration Program - \$4 million budget with about \$900,000 already spent - has already been used to start the SNRAMP proposed plans to decommission trails, erect permanent fencing, remove existing landscaping, and install new native plants. In addition in the Glen Canyon Creekside Trail Habitat Conservation Fund (9/13/10) (See *Attachment A*), RPD claims that the proposed project is “not related to any larger project, series of projects, or program”, when in fact the project is directly implementing the SNRAMP proposed plans and altering the park land use.

Sincerely,



Arnita Bowman Justifications for Revising the SNRAMP DEIR.pdf

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Justifications for Revising the SNRAMP DEIR

Prepared by Arnita Bowman, 6/11/2012

Section 1: Table 5 - Summary of Natural Areas Management Plan

1.1 Need to correct Existing and Resulting Trail Distances in Table 5: Summary of Natural Areas Management Plan

The following inaccuracies were observed in the trail distances in Table 5:

1. The 2008 Park Bond Trail Restoration Program (Bond Trail Restoration) for Billy Goat Hill and Twin Peaks demonstrates RPD's intentions for decommissioning trails based on the SNRAMP and this intent far exceeds the feet of trails designated in Table 5. *Attachment B* includes some of the project documents illustrating the decommissioning of trails.
2. It is likely that the street roads and sidewalks were included in the trails distances designated in Table 5 since the existing and remaining trails distances are much greater than the trails depicted on the DEIR trail maps for Twin Peaks and Billy Goat Hill DEIR maps. Including city streets and sidewalks is not appropriate because they are not maintained by RPD and/or are not Natural Area's trails.
3. The McLaren proposed plan also includes creating habitat for the endangered Mission Blue Butterfly, which based on the Final Bond Trail Restoration Twin Peaks conceptual trail design (<http://sfrpd.org/wp-dev/wp-content/uploads/Twin-PeaksTrail-concept-plan.pdf>), results in closing even primary trails. Also, the Interior Greenbelt trail is missing from the SNRAMP map of existing trails and should be added to the map and the existing trail feet in Table 5.

These inaccuracies indicate that Rec & Park must reevaluate and restate the trail distances for all sites represented in the Table 5 for the revised DEIR to ensure that:

- 1) The distances reflect the most likely SNRAMP plans for decommissioning existing secondary trails (aka social trails) and primary trails based on the actual trail projects already completed or designed for the Natural Areas. For example, Billy Goat Hill, Twin Peaks, Glen Canyon, and McLaren all contain(ed) significant secondary trails (aka social trails) than are represented in Table 5 and Twin Peaks and McLaren contain primary trails crossing planned endangered species restoration zones.
- 2) Trail distances are only for actual Natural Areas' foot trails and not city streets and sidewalks, particularly those not maintained by the Natural Areas or even RPD.

Additional Notes:

The Bond Trail Restoration projects represent the most conclusive evidence of RPD's intentions regarding decommission trails and erecting fencing based on the SNRAMP. While I do not have the professional tools necessary to measure the trail distances on the Bond Trail Program or the DEIR maps with complete accuracy, the rough measurements demonstrate that the numbers represented in the DEIR Table 5 are significantly different both in percentage and overall distance for both Billy Goat Hill and Twin Peaks and represent a far greater impact on recreation than currently is represented in Table 5. Below is a rough analysis based on using string and a ruler to measure the trail distances that is purely to illustrate the need for RPD to reevaluate and correct the values presented in Table 5.

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2008 Bond Trail Restoration Project	Rough Trail Feet Estimate****				DEIR Draft Table 5 Trail Feet			
	After Trail Project	Existing	Decommissioned by Trail Project	%	After Trail Project	Existing	Decommissioned by Trail Project	%
Billy Goat Hill *	688	1912	1224	64%	1855	2600	745	29%
Grand View **	1471	1853	382	21%	1313	1722	409	24%
Twin Peaks ***	2718	8050	5332	66%	6939	8741	1802	21%
<p>* The estimated feet of authorized trails after the trail restoration is per the map in the Billy Goat Hill Trail Enhancement And Restoration Project - SCOPE OF WORK for Yerba Buena Construction. The estimate of the original trails is based on the trail depictions on the Scope of Work map and the trails depicted on the Draft DEIR FIGURE 6.9 - 4 MANAGEMENT AREAS AND TRAIL PLAN BILLY GOAT HILL. Note there is a significant difference in the trail feet between the estimate and the DEIR draft which may be represented by the city street that runs beside the park and that isn't appropriate to include as a Natural Areas' trails.</p> <p>** The estimated feet of authorized trails after the trail restoration is per the map in the Grand View Trail Enhancement And Restoration Project - SCOPE OF WORK for Yerba Buena Construction. The estimate of the original trails is based on the trail depictions on the Scope of Work map and the trails depicted on the Draft DEIR FIGURE 6.5 - 17 MANAGEMENT AREAS AND TRAIL PLAN GRAND VIEW.</p> <p>*** The estimated feet of authorized trails after the trail restoration is the Final Twin Peaks Conceptual Project Plan. The estimate of the original trails is based on the trail depictions on the conceptual plan and the trails depicted on the Draft DEIR FIGURE 6.8 - 5 MANAGEMENT AREAS AND TRAIL PLAN TWIN PEAKS. Note that DEIR draft likely included the non-RPD road as a trail, which was not included in the rough estimates as it is not a NAP trail.</p> <p>**** These estimates are rough estimates based on the use a string and ruler technique to measure the distances and calculate using the scales provided on the map. These only provide a general assessment of the trail distances.</p>								

Table 5 also likely understates the trails to be decommissioned for other Natural Areas based on the actual history of the Natural Areas Programs and the Bond Trail Program, which is the best evidence of RPD's intentions. Based on the Bond Trail Program projects, one must project that NAP intends to decommission almost all secondary trails (aka social trails) plus some primary trails that cross the MA-1 zones or proposed endangered species reintroduction areas. For example, the primary trails at McLaren are approximately 3 miles, which is far less than the more than 8 miles stated in Table 5 for trails to remain. Even though much of MA-1e doesn't even contain the lupine host plants for the Mission Blue, the proposed plan is to "augment the Mission Blue Butterfly Habitat" and "monitor" and "install fencing" in the extensive MA-1e zone, which is predominated by non-native oat grassland. Based the strategy for decommissioning primary trails illustrated by the final Twin Peaks design, the distances for several of the McLaren MA-1e primary trails must be included in the trails designated to be decommissioned in Table 5.

1.2 Add a summary of urban forest acres to be converted long term to coastal dunes, scrub, and grassland in Table 5: Summary of Natural Areas Management Plan

Rec & Park and city officials have routinely attempted to marginalize the publics' opposition to the SNRAMP by stating in the media and at public presentations that only 5% of trees will be removed and that trees will be replaced one-for-one. This deceptive information regarding the SNRAMP undermines the public and official's understanding of the proposed plans and current management practices and their ability to comment fully on this significant issues related to the plan; therefore, the DEIR needs to clarify this controversial issue in the executive summary to ensure reviewers of the DEIR are not misled by the omission of significant information.

Specially, the revised DEIR needs to provide the public with an additional summarized analysis of the total acres of urban forest that the SNRAMP states will be eliminated long-term and replaced with coastal scrub, dunes, and grassland. The public needs to be aware that the direct cutting of trees will only cause part of the significant environmental impact with equally significant impacts from:

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- 02 (Cont.) { 1) Thinning the remaining MA-3 forest,
2) Removing all small trees in MA-1 and MA-2 , thus stopping the natural regeneration of self-sustaining trees, until the conversion is complete,
3) Accelerating the windthrow and erosion attrition for the remaining trees, due to removing trees

- 03 { The 2006 Pine Lake project is the best representation of the SNRAMP proposed plan for tree removal and fencing in the Natural Areas. Pine Lake demonstrates how the removal of trees impacts the park by opening up the forest curtain to expose houses and how removal of trees results in wind throw which along with the understory removal results in erosion as demonstrated in the pictures in *Attachment C*. Real depictions should be used to demonstrate the results of the deforestation on the Natural Areas instead of the unrealistic and misleading pictures used for *Impact AE-4* in the DEIR, which don't show the removal of any trees particularly for visitors within the park. Because the aesthetics of a park are so significant to visitors and has been highlighted by speakers at many public meetings, the aesthetics environmental impact section should also include realistic pictures, such as those from Pine Lake, that demonstrate realistic changes that will result from the adoption of the SNRAMP.

- 04 {
05 { These long term plans for eliminating forest acres should also be incorporated into the significance analysis of aesthetics, hydraulics, air quality, biological resources, wind and shadow, and recreation environmental impacts.

1.3 Correct the "existing" trees and clarify impact of trees removed since initiation of SNRAMP

The DEIR existing trees must be reevaluated to correctly state the actual trees existing at each site. Rec & Park presentations to the public, media, and decision makers about the DEIR almost always refer to the percentage of trees to be removed, which indicates the importance of correctly stating the existing number of trees so that this percentage is fairly stated.

As an example, Pine Lake indicates systemic problems with the tree numbers presented in the DEIR. HORT Science conducted a tree survey at Pine Lake in March 2011 for Rec & Park and identified only 229 trees at Pine Lake, which includes the 82% of Pine Lake acres that is not in the Natural Areas. This indicates that it is impossible for 1000 trees, as stated in Table 5, to exist on the 8.4 NAP acres, which is largely open water and Riparian vegetation with small shrubs and a highly thinned MA-3 and MA-2 forest. It also indicates that the methodology for determining existing trees is flawed and needs to be corrected to more accurately reflect the number of existing trees summarized in Table 5 and also contained in the Forestry Appendix F. Otherwise, the percentage of tree removal will be significantly misstated for those reviewing the final EIR and in presentations to the public. Also, existing tree counts represented for Glen Canyon and Mt Davidson are of particular concern because the numbers do not seem reasonable based on the actual density of trees and the existing open spaces with few trees in the zones included in the tree acreage. Because the number and percentage of trees is such a significant measure used in all presentations regarding the DEIR, the DEIR should reflect the actual trees at the sites not some highly inaccurate estimate which overstates the existing trees and thus significantly understates the percentage of trees to be removed.

It is also not stated in the DEIR as to whether trees removed since the creation of SNRAMP are included in the "existing" or "to remove" trees or neither, which is important information for decision making and for understanding the impact of the proposed plan. As examples of trees that have already been removed since the creation of NAP, according to the SNRAMP Forestry Appendix F, Pine Lake had 132 trees removed in 2006 and the DEIR Table 5 shows no additional trees to be cut. Note that extensive numbers of trees have also already been removed by various trail projects (e.g., Corona Heights, Interior Greenbelt, Grand View), by vandals (e.g., Glen Canyon), by construction projects (e.g., Mt Davidson), by tree assessment projects (e.g., Pine Lake, Interior Greenbelt), etc.

The on-going deforestation at Grand View and Pine Lake in the MA-3 forests is also a concern since even in areas that SNRAMP proposes to maintain forests; the areas are being converted to native plants instead of retaining the forest. See *Attachment C* for pictures of trees removed and the new native plant gardens in areas zoned as MA-3 forests at Pine

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Lake. Also, below is the Google Map street picture from April 2011 for Grand View that shows young cypress trees that are not at Grand View after the 2008 Bond Trail Restoration. Note these young trees are in a zone designated as MA-3 where SNRAMP proposes to retain the Cypress trees. As shown in the picture the MA-3 zone has numerous tree stumps instead of Cypress trees. This illustrates how the "no project" status is also significantly detrimental to the aesthetic and scenic value of the Natural Areas and pictures showing these changes in the DEIR should be shown in the DEIR.



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(Cont.)

Picture 1: Screenshot from Google Maps street view of Grand View. Google Maps shows that the picture was taken in April 2011. I added the circle to show several young cypress trees that are no longer at Grand View. One of the young cypresses is still there but it appears to be outside the RPD park boundary.



Picture 2: A large section of trees were removed at the Stanyan entrance of the Interior Greenbelt, which is also a MA-3 zone.

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1.4 Clarify plans for reforestation and types of trees used for reforestation

Any reforestation plans or the lack of a reforestation plans should also be stated with an analysis of the likelihood of success, since the NAP has had limited success with establishing native trees with past projects (e.g., Tank Hill, Mt Davidson). I have observed successful oak plantings at Golden Gate Heights and two McLaren locations but all three sites have been in areas sheltered from wind by surrounding urban forests and are park areas outside the Natural Areas. Difficulties with establishing oaks is likely indicative of the environmental changes relating to global climate change, pollution related to densely populated city, the limited locations in the Natural Areas where native trees thrive in a windy and foggy environment, and that the Westside Natural Areas are naturally sand dunes.

The public should also be made aware in the summary about the type of trees expected to be planted, since shrubs that may grow into small trees do not have the same aesthetic quality as the majestic, large trees currently in the urban forests nor do shrubs that may grow into small trees have the same environmental impacts (e.g., air pollution absorption, carbon sequestration, etc.) as large trees. Note that per Rec & Park records provided from a Sunshine request, the only trees planted in the Natural Areas during the past three years except for 74 oaks were really shrubs. Below in Table A is a summary of the trees planted by location and Table B is the actual list of NAP Tree Planting 2009 to 2012 that was provided by RPD based on a Sunshine Act Request.

Table A: FY 2009 to 2012 Natural Areas Program Tree Planting – Almost all Shrubs that May Grow into Small Trees
Summarized from NAP Tree Planting List Provided by an Rec & Park Sunshine Request (Shown in Table B)

Row Labels	AESCAL-Buckeye	ALNRUB-N/A	HETARB-Toyon	MYRCAL-Myrtle Scrub	PRULI-Hollyleaf cherry	QUEAGR-Coast Live Oak	SALSPP-Willow	SAMMEX-Blue Elderberry	SAMRAC-Elderberry	SALLUC-Shining willow	Grand Total
Bayview					25						25
Billy Goat	8				5	3					16
Buena Vista			10			15			10		35
Corona Heights			8			12	2				22
Edgehill					17	15		8	19		59
Glen Canyon		15			25			10	9	10	69
Lake Merced	10	15	18	25		20			55		143
McLaren											
Oak Woodlands				57				19	25		140
Pine Lake	8	29		24		9	9		63		142
Grand Total	55	69	95	89	87	74	11	37	181	10	708

Row Labels	2008/09	2009/10	2010/11	2011/12	Grand Total
Bayview	20	5			25
Billy Goat		11	5		16
Buena Vista	10	10	10	5	35
Corona Heights	8	10		4	22
Edgehill	15	27	17		59
Glen Canyon	25	25	19		69
Lake Merced	78	60	5		143
McLaren	15	42	24	59	140
Oak Woodlands	12	20	25		57
Pine Lake	41	73	28		142
Grand Total	224	283	133	68	708

Row Labels	2008/09	2009/10	2010/11	2011/12	Grand Total
AESCAL-Buckeye	5	27	13	10	55
ALNRUB-N/A	15	38	6	10	69
HETARB-Toyon	23	40	30	2	95
MYRCAL-Myrtle Scrub	21	48	15	5	89
PRULI-Hollyleaf cherry	35	37	10	5	87
QUEAGR-Coast Live Oak	21	33	13	7	74
SALSPP-Willow	6		3	2	11
SAMMEX-Blue Elderberry	5	10	5	17	37
SAMRAC-Elderberry	93	40	38	10	181
SALLUC-Shining willow		10			10
Grand Total	224	283	133	68	708

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Table B: NAP Tree Planting 2009 to 2012

Annual Total				Four Year Total			
61	2011/12					676	
124	2010/11						
273	2009/10						
218	2008/09						
2011/12	Species	Number	Park	2010/11	Species	Number	Park
	AESCAL	10	McLaren		AESCAL	5	Billy Goat
	ALNRUB	10	McLaren		AESCAL	2	McLaren
	HETARB	2	McLaren		AESCAL	6	Pine Lake
	MYRCAL	5	McLaren		ALNRUB		
	PRUILI				HETARB	5	Buena Vista
	QUEAGR	5	Buena Vista		HETARB	25	Oak Woodlands
	QUEAGR	2	Corona		MYRCAL	5	Lake Merced
	SALSPP				MYRCAL	10	McLaren
	SAMMEX	17	McLaren		PRUILI	10	Glen Canyon
	SAMRAC	10	McLaren		QUEAGR	5	Buena Vista
	Subtotal	61			QUEAGR	5	Edgehill
					QUEAGR	3	Pine Lake
2009/10	Species	Number	Park		SALSPP		
	AESCAL	3	Billy Goat		SAMMEX	3	Edgehill
	AESCAL	5	Lake Merced		SAMMEX	2	McLaren
	AESCAL	17	McLaren		SAMRAC	9	Edgehill
	AESCAL	2	Pine Lake		SAMRAC	9	Glen Canyon
	ALNRUB	5	Glen Canyon		SAMRAC	10	McLaren
	ALNRUB	10	Lake Merced		SAMRAC	10	Pine Lake
	ALNRUB	23	Pine Lake		Subtotal	124	
	HETARB	5	Buena Vista	2008/09	Species	Number	Park
	HETARB	5	Corona Heights		AESCAL	5	Lake Merced
	HETARB	10	Lake Merced		ALNRUB	10	Glen Canyon
	HETARB	20	Oak Woodland		ALNRUB	5	Lake Merced
	MYRCAL	10	Lake Merced		HETARB	3	Corona Heights
	MYRCAL	15	McLaren		HETARB	8	Lake Merced
	MYRCAL	23	Pine Lake		HETARB	12	Oak Woodlands
	PRUILI	5	Bayview		MYRCAL	10	Lake Merced
	PRUILI	5	Billy Goat		MYRCAL	10	McLaren
	PRUILI	17	Edgehill		MYRCAL	1	Pine Lake
	PRUILI	10	McLaren		PRUILI	20	Bayview
	QUEAGR	3	Billy Goat		PRUILI	15	Glen Canyon
	QUEAGR	5	Buena Vista		QUEAGR	5	Corona Heights
	QUEAGR	5	Corona Heights		QUEAGR	10	Lake Merced
	QUEAGR	10	Edgehill		QUEAGR	6	Pine Lake
	QUEAGR	10	Lake Merced		SALSPP		
	SALLUC	10	Glen Canyon		SAMMEX	5	Edgehill
	SAMMEX				SAMRAC	10	Buena Vista
	SAMRAC	15	Lake Merced		SAMRAC	10	Edgehill
	SAMRAC	25	Pine Lake		SAMRAC	40	Lake Merced
	Subtotal	273					

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SAMRAC	5	McLaren
SAMRAC	28	Pine Lake
Subtotal	218	

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Section 2: Table I - Summary of Environmental Effects - Recreation

Change all recreation environmental impact statements to Significant for Proposed Project, Maximum Restoration and No Project to reflect the significance of the proposed plan and the current Natural Areas Program management on park visitors. Consider conducting an unbiased survey of Natural Areas visitors to determine the significance of decommissioning trails, removing park greenery (aka Trees, ivy, etc.), restricting visitors to trails, removing park benches, closing dog play areas, spraying herbicides, etc. on visitor experience and use of the parks.

Proposed Plan, Maximum Restoration, and the No Project alternatives impact ratings for Recreation need to be changed to "Significant" to reflect the high value that residents place on trails and visiting nature and the significant change in people's recreational access to the land that is proposed. By decommissioning existing trails, installing fences, removing benches, and requiring visitors to stay on the trail, SNRAMP does the opposite of improving these highly valued facilities and encouraging visitation to parks and represents a significant negative environmental impact to recreational activities in the park and this is not fully recognized or analyzed in the DEIR.

According to the [2004 Rec & Park Assessment Survey](#), 67% of households run or walk in parks and 61% visit nature plus 55% of residents consider walking and biking trails to be one of the most important recreational facilities. Trails were by a wide margin the most important recreation facility according to the survey. Running, walking, and enjoying nature are also low cost options for all residents to combat public health issues such as obesity, diabetes, heart disease, mental health issues, etc., and restricting access discourages residents from fully using parks to promote health and well-being. Any analysis that assumes the SNRAMP plan does not have a significant impact of recreation needs to be supported by unbiased evidence such as an independent survey. Note that public hearing are not sufficient as RPD has a reputation for filtering public input to only present the information that supports RPD's current position.

Excerpt from 2004 Rec & Park Assessment Survey

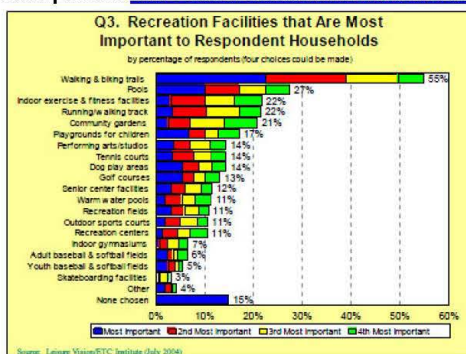


Figure 6 – Most Important Recreation Facilities

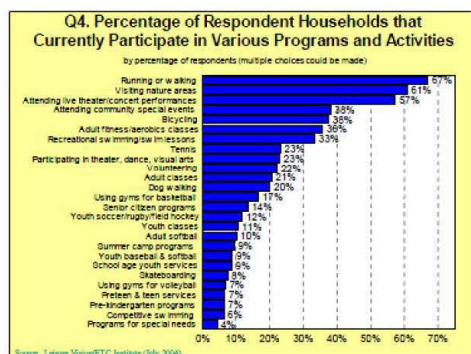


Figure 7 – Current Participation of Various Programs and Activities

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In addition, freedom to play in parks promote children engaging with the outdoors and also provides health benefits as summarized by the National Wildlife Federation: <http://www.nwf.org/News-and-Magazines/Media-Center/News-by-Topic/Get-Outside/2012/04-12-12-Getting-the-Dirt-on-Dirt-for-Healthier-Happier-Children.aspx>. See *Appendix D*.

In addition to decommissioning trails, the Natural Areas' Sensitive and Important Habitat signs requiring people to "Stay on the Designated Trail" have already been posted at the entrances of Natural Areas which indicates that these rules apply to even the highly resilient forest and grassland areas and significantly alters the recreation land use of all Natural Area zones.

In addition, rows of fencing have already been installed in the Natural Areas which restrain people from using park areas and also mar the park aesthetics. See *Appendix E* with pictures of unattractive fencing that mars the beauty and views of the Natural Areas. The fencing that runs the length of the Sharp Park berm has a large number of holes in the fence which illustrate that the public wants to use these areas and trails for recreation where the Natural Areas Program is

attempting to bar access. My understanding is also that the transfer of the property to the City of San Francisco stipulates that these areas are for recreation and converting these park areas to habitat conservation zoning does not comply with that stipulation.

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Picture 3: One of the many holes in the ugly wire fencing along the Sharp Park berm, which is a high use recreational area with walkers, runners, bicyclists, dog walkers, fishermen, and golfers. Also note the dead trees which also diminish the aesthetics of the area.



Picture 4: The Natural Areas have a significant number of mysteriously dead trees that have not been addressed, such as at Sharp Park. These trees once represented a beautiful forest that once improved the aesthetics of the area for visitors.

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Examples of significant SNRAMP conservation focused recommendations that will have a significant degrade the recreational land use of the Natural Areas include:

GR-11a: plan recommends re-routing or closing 10.3 miles of trail (approximately 26 percent of total existing trails).

GR-11c: Public use in all Natural Areas, unless otherwise specified, should encourage on-trail use. To reduce the deleterious effects of trampling in unstable areas, formal use areas, including designated trails, shall be created at locations that are sufficiently stable to withstand the pressure of public use (see GR-11a). Additionally, interpretive and park signs should be installed or modified as appropriate to include "Please Stay on Trails" with information about why on-trail use is required.

GR-11d: Natural Areas shall be monitored on a routine basis for the development of new social trails. Those that impact sensitive species or sensitive habitats or that contribute to erosion problems shall be closed or re-routed (see GR-11b) with signs and brush barriers. Temporary fencing will be used as a last resort in these areas if less obtrusive measure (signs, brush barriers) are not effective.

What I'm struck by when I visit Natural Areas is that while the Natural Areas Program deems it a sensitive habitat, most of the area is really quite resilient. Instead of being an "important habitat" it is far more important to me as place for families with small children to gain confidence, explore and enjoy nature and the outdoors. There are thousands and thousands of acres of coastal scrub and grassland and oak woodlands that are nearby on the San Francisco Peninsula at places like San Bruno Mountain and the San Francisco Peninsula Watershed but families have few places within walking distance of their homes to enjoy the outdoors. When I visit expensive native plant restoration areas like Milagra Ridge that confine people to the designated trails, there are few people and even fewer young children. I recently went to Indian Basin Shoreline Park for the first time. A group of local school children were visiting the park and the most gleeful moment was when they got to leave the trail and turn over rocks to try to find crabs. At Glen Canyon, the big thrills for children are climbing over a tree, forging a creek, taking the social path far from the adults (aka 10 feet away), showing off the "Tiger Claw" trees, etc. Glen Canyon is alive with wild critters but watching the wonders of children exploring is by far the most entertaining activity in the park.

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Closing trails and access not only impacts children exploration and enjoyment. I visit Sharp Park often and the lagoon was the equivalent of our 18th hole on our hiking trips that I miss deeply. I'm obviously not the only one as the fence along the berm is riddled with holes made by individuals that obviously believe as I do visiting the lagoon is a significant recreational activity. The ugly fence also diminishes the aesthetic of the golf course for those walking on the berm and creates an exclusionary atmosphere where before it felt as if the golf course was for everyone.

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Side Note: The Lagoon is not a critical habitat for any species. It is not any more critical to the frogs than the water bodies in Golden Gate Park that may also support the California Red Legged Frog. The 22,000 acre San Francisco Peninsula Watershed is the critical habitat for the frogs, which are actually common along the coast but have declined in the Sierras. Because it was a salt water lagoon, it is also questionable as to whether the frogs were introduced or naturally

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- 09
(Cont.) { *exist in the lagoon. There is also no substantive evidence that recreation is harming the frogs in the lagoon.*
- 10 { Equally concerning is the constant pesticide warning signs with little indication of where the spraying is occurring. This certainly impacts my willingness to go to the parks, particularly Mt Davidson, which appears to have spraying right next to the trail to kill the blackberries and ivy.
- 08
(Cont.) { Rec & Park seems to believe that creating “volunteer” stewardship programs in some way replaces or compensates for the millions of self-guided visits each year that residents make to these parks. While volunteering is important for many reasons, it does not replace personal, daily interactions with nature in the parks, plus the Natural Areas Program is alienating large segments of daily park users, thus reducing these users willingness to participate in volunteer programs or support Rec & Park. With more than 800,000 residents, the FY 2009-2010 volunteer hours of 129,703 of habitat restoration, gardening and recreation program support represents a minor element of people’s recreational use of the park. In addition, the volunteer habitat restoration projects are in some cases assisting with decommissioning recreational access to the parks. It is also concerning that RPD is directing most volunteer hours to native plant gardening and few hours to other park maintenance needs.
- Rec & Park recently used volunteers to create lovely new trails in the Corona Heights forest and re-opened a historic trail in the Interior Greenbelt forest and both are popular with residents. However, these trails do not compensate for the social trails to be closed in other Natural Areas or the intense “sensitive habitat” controls planned and both trails could easily have been created under the recreation or maintenance alternative. Both these trails indicate that residents appreciate having trails through forests and there are few such opportunities in San Francisco and SNRAMP’s restoration and conservation objectives minimize the opportunity for creating more such highly valued trails through forests to meet the needs of residents.

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- 12 {
- 2 Evaluate the environmental impacts on public health related to discouraging daily exercise and recreation and on the changes to air quality for those exercising in the parks.**
- The DEIR does not specifically address the public health implications of policies that discourage exercise and diminish mental health benefits of the Natural Areas. In addition, trees benefit air quality and the plan does not address the impact of the removal of trees on air quality for those exercising or using the parks. The environmental impact on public health is significantly degraded by the SNRAMP proposed plan and the policies implemented by the Natural Areas Program since the creation of the SNRAMP.
- The following are articles substantiate the need for such analysis:
- How Getting Dirty Outdoors Benefits Kids**, National Wildlife Federation
<http://www.nwf.org/News-and-Magazines/Media-Center/News-by-Topic/Get-Outside/2012/04-12-12-Getting-the-Dirt-on-Dirt-for-Healthier-Happier-Children.aspx>
 See *Attachment D*.
- Trees – The Air Pollution Solution**, Center for Urban Forest Research
<http://www.ncbi.nlm.nih.gov/pubmed/18648125>
 See *Attachment F*.
- Parks and recreation settings and active living: a review of associations with physical activity function and intensity.** Kaczynski AT, Henderson KA.
<http://www.ncbi.nlm.nih.gov/pubmed/18648125>
- 13 { In addition, poison oak is increasing in the parks and herbicide use is escalating. From personal experience, I know that poison oak outbreaks are debilitating for one to two weeks. When I have a poison oak outbreak, I am typically bedridden for 4 to 5 days with a painful reaction. Allowing poison oak to proliferate near city park trails should never be allowed because of health reasons.

Bowman-2

14 (Cont.)	<p style="text-align: center;"><i>Section 3. III.A.1 Background</i></p> <hr/> <p>Clarify in the DEIR that most of the “Natural Areas” are predominately non-native plants and trees and not remnant or sensitive habitat. Most of the Natural Areas are planted forests and old livestock pastures that SNRAMP plans to convert to native coastal dunes, scrub, and grassland to treat as conservation areas instead of recreational areas. The statement “The Natural Areas Program mission is to preserve, restore, and enhance the remnant Natural Areas and to promote environmental stewardship of these areas” is incomplete without incorporating the current land use and type of land.</p> <hr/> <p>Throughout the SNRAMP, it discuss that the Natural Areas are predominated by plants that are not native to SF, and the urban forests are almost exclusively non-native plants. RPD often makes the claim in the media and public presentations that the Natural Areas are remnant Natural Areas is misleading and does not provide the public with a clear understanding of the extend of the SNRAMP plans.</p>
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Attachment A

Excerpts from the Glen Canyon Creekside Trail Habitat Conservation Fund application for the Glen Canyon Loop Trail Improvement Project Environmental Evaluation Application dated 9/13/10



Red box designate specific concerns with the Application. These areas indicate that RPD did not disclose that this project relates to SNRAMP, which is in the process of an environmental review and the project contains significant modifications to the Natural Area that are based on the SNRAMP recommendations.

Bowman-2

Glen Canyon Creekside Loop Trail
Habitat Conservation Fund – Trails Category

**CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)
Compliance Certification Form**

Grantee: San Francisco Recreation and Park Department

Project Name: Glen Canyon Creekside Trail
Project Address: Diamond Heights Blvd. and Berkeley St.

When was CEQA analysis completed for this project? Date 9/29/2010

What document(s) was filed for this project's CEQA analysis: (check all that apply)

☐ Initial Study ☐ Notice of Exemption ☐ Negative Declaration ☐ Mitigated Negative Declaration

☐ Environmental Impact Report ☒ Other Environmental Evaluation finding project Categorical Exemption from Environmental Review under the California Environmental Quality Act guidelines Section 15301, Class I (h) Maintenance and restoration of landscaping and trails.

Note: If a Master Environmental Impact Report was used to comply with CEQA you are certifying that the project is covered in adequate detail to allow the project's construction or acquisition.

Attach the Notice of Exemption or the Notice of Determination as appropriate. If these forms were not completed please attach a letter from the Lead Agency explaining why.

Lead Agency Contact Information:

Agency Name: San Francisco Planning Department Contact Person: Brett Bollinger
Mailing Address: 1650 Mission Street, Suite 400, San Francisco, CA 94103-2479
Phone: (415) 575-9024 Email: bbollinger@sfgov.org

Certification:

I hereby certify that the lead agency listed above has determined that it has complied with the California Environmental Quality Act (CEQA) for the project identified above and that the Project is described in adequate and sufficient detail to allow the project's construction or acquisition.

I represent and warrant that I have full authority to execute this CEQA Compliance Certification on behalf of the lead agency. I declare under penalty of perjury that the foregoing certification of CEQA Compliance for the above named project is true and correct.


Signature _____ Date 9-30-2010

Dawn Kamalanathan, Capital & Planning Mgr.
San Francisco Recreation and Park Department
Authorized Representative

Submitted by the San Francisco
Recreation and Park Department

Bowman-2

Glen Canyon Creekside Loop Trail
Habitat Conservation Fund

GRANT SCOPE/Cost Estimate Form

Recreation Feature - Development of 8,500 Square Feet of existing trail construct. Construct new low retaining walls as needed, soil erosion control measures including biotechnical solutions, and provide new plantings and native plant restoration.

Recreation Feature - Development of 100 linear feet of new trail.

Recreation Feature - Closure of 1,177 linear feet of social trail and provide new protective fencing as needed to protect habitat and for public safety

Recreation Feature - Restore existing steps and provide new box steps as needed.

Recreation Feature - Construct turnpikes along trail as needed.

Recreation Feature - Install foot bridge or boardwalk near creek.

Recreational Feature - Install wayfinding and interpretive signage; trail welcome signage.

GRANT SCOPE items – PRE-CONSTRUCTION costs	HCF Grant	Required Match	Total
Pre-Construction and Planning Cost funded by non-grant match.	Subtotal: \$0	\$0	\$0
GRANT SCOPE items – ACQUISITION or CONSTRUCTION costs	HCF Grant	Required Match	Total
Soil Binder	\$ 880	\$ 880	\$1,760.00
BioTech Erosion Control	2,600	2,600	\$5,200.00
Boardwalk	5,500	5,500	\$11,000.00
Creek - cape ivy removal	1,200	1,200	\$2,400.00
Fencing - split rail	9,400	9,400	\$18,800.00
New Trail	10,000	10,000	\$20,000.00
Retaining Walls (less than 2' tall)	13,302.5	13,302.5	\$26,605.00
Retaining Walls (greater than 2' tall)	15,300	15,300	\$30,600.00
Sign - Wayfinding	250	250	\$500.00
Social Trail closure	19,662	19,662	\$39,324.00
Box steps (4 wide)	1,300	1,300	\$5,000.00
Trail Edging	1,450	1,450	\$2,900.00
Trail Restoration	21,250	21,250	\$42,500.00
Trailside Planting	37,462.5	37,462.5	\$74,925.00
Turnpike	22500	22500	\$45,000.00
Water Bars	1330	1330	\$2,660.00
Total:	\$163,587	\$163,587	
TOTAL PROJECT COST			
			\$327,174

APPLICANT's MATCH Sources (by name and date committed)	Total
2008 Clean and Safe Neighborhood Parks Bond , July 1, 2009	\$163,587
Total of MATCH Sources	
	\$163,587

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PART 3 – ADDITIONAL PROJECT INFORMATION		Yes	No
1. Would the project involve a major alteration of a structure constructed 50 or more years ago or a structure in an historic district? If yes, submit a <i>Supplemental Information Form for Historical Resource Evaluation</i> . Instructions on how to fill out the form are outlined in the <i>San Francisco Preservation Bulletin No. 16</i> (see pages 28-34 in Appendix B).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
2. Would the project involve demolition of a structure constructed 50 or more years ago or a structure located in an historic district? If yes, a Historic Resource Evaluation Report (HRE)* will be required. The scope of the HRE will be determined in consultation with the Department's Preservation Coordinator.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
3a. Would the project result in excavation or soil disturbance/modification greater than 10 feet below grade? If yes, how many feet below grade would be excavated? _____ What type of foundation would be used (if known)? _____	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
3b. Is the project site located in an area of potential geotechnical hazard as identified in the San Francisco General Plan or on a steep slope or would the project be located on a site with an average slope of 20% or more? If yes to either Question 3a or 3b, please submit a Geotechnical Report.*	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
4. Would the project involve expansion of an existing building envelope, or new construction, or grading, or new curb cuts, or demolition? If yes, please submit a <i>Tree Disclosure Statement</i> .	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
5. Would the project result in ground disturbance of 5,000 gross square feet or more?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
6. Would the project result in any construction over 40 feet in height? If yes, apply for a Section 295 (Proposition K) Shadow Study. This application is available on the Planning Department's website and should be submitted at the Planning Information Center, 1660 Mission Street, First Floor.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
7. Would the project result in a construction of a structure 80 feet or higher? If yes, an initial review by a wind expert, including a recommendation as to whether a wind analysis* is needed, may be required, as determined by Department staff.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
8. Would the project involve work on a site with an existing or former gas station, auto repair, dry cleaners, or heavy manufacturing use, or a site with underground storage tanks? If yes, please submit a Phase I Environmental Site Assessment (ESA).* A Phase II ESA (for example, soil testing) may be required, as determined by Department staff.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
9. Would the project require any variances, special authorizations, or changes to the Planning Code or Zoning Maps? If yes, please describe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
10. Is the project related to a larger project, series of projects, or program? If yes, please describe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
11. Is the project located on a site with a building or structure that is a landmark or historic resource? If yes, and the project would be over 55 feet tall or 10 feet taller than an adjacent building built before 1963, please submit an elevation or renderings showing the project with the adjacent buildings.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

* Report or study to be prepared by a qualified consultant who is contracted directly by the project sponsor.

Bowman-2

Neglected & Removed Forests Degrade “Natural Areas” Aesthetics

Examples of Deforestation in Areas Zoned to Retain Existing Forest (MA-3)



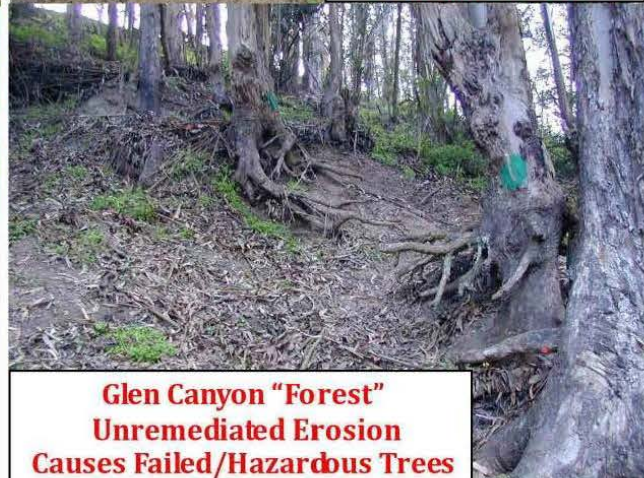
Grand View “Forest”



**Pine Lake “Forest”
2006/2012 Trees &
Saplings Removed**



**Interior Green Belt Forest
2011 Trees Clear Cut Next to Trail Entrance**



**Glen Canyon “Forest”
Unremediated Erosion
Causes Failed/Hazardous Trees**

Example of “Neighborhood Park” vs “Natural Area” Forest Buffer

The long-term goal for MA-1 and MA-2 zones is to slowly convert to native scrub and grassland.

UN-restored



**“Neighborhood Park”
Trees create refuge from
sights and sounds of city**

Pine Lake

Restored



**“Natural Area” (MA-2)
Initial trees removed exposing houses
2006 132 trees removed from Pine Lake -
NAP MA-2 still predominately non-native plants**

Bowman-2



Bowman-2

All the Fuss About Mess

"Don't track mud in the house!"

"Wash your hands before dinner!"

"You can't play with that, you don't know where it's been!"

Parents wear those phrases out like old blue jeans put through the spin cycle too many times. Many have come to see D-I-R-T as a four-letter word. Only two decades ago, kids made forts with sticks and mud, waded up to their knees in streams. How many do that now? Fears about dangers lurking in the muck (microbes, parasites and amoebas, oh my!) and a societal slant in favor of over-sanitization keep families from letting kids do what comes naturally, which is to go outside and get a little messy.



"If your child isn't coming in dirty every day, they're not doing their job."

Dr. Mary Ruebush,
immunologist and
author of
*Why Dirt is Good:
5 Ways to Make
Germs Your Friends.*

But here's a dirty little secret:

Dirt and germs can actually be good for kids. The things small children want to do outside, like building mud castles, splashing around in puddles and rolling down hills until their clothes are irreparably grass-stained—all those things that make mothers reach for hand sanitizer and laundry detergent—may, in fact, be a grubby little prescription for health and happiness.



Bowman-2

Unfortunately, boys and girls today spend the better part of their time, seven hours per day on average (Rideout, 2010), indoors, in the sterile company of technology, rather than following their in-born impulses to explore the natural world with their senses. This indoor childhood is damaging to kids. In fact, in the last twenty years as kids spent less and less time outside, childhood obesity rates more than doubled (CDC, 2008), the United States became the largest consumer of ADHD medications in the world (Sax, 2000), 7.6 million U.S. children are vitamin D deficient (Kumar, 2000), and the use of antidepressants in pediatric patients rose sharply (Delate, 2004).

When kids do leave the house, a growing body of research suggests the exact things we do in the name of protecting them from dirt and germs, such as not letting them get too messy and frequently using hand sanitizers and antibacterial products, can inhibit their mental and physical health and resilience.

This report reveals how getting down and dirty in the great outdoors — far from being a bad thing — helps children lead healthier, happier lives.



The DIRT on DIRT: How getting dirty outdoors benefits kids

For the Health of It:

How getting messy outside benefits the heart, skin, and immune system

The Joy of Dirt:

How playing outside in the dirt increases happiness, reduces anxiety and enhances learning

Good Clean (Dirty) Fun:

Dirty-hands-on tips for parents and caregivers

Bowman-2

For the Health of It

Getting messy outside benefits the heart, skin, and immune system.

Children who don't spend time outside run the risk of serious health issues, such as obesity (CDC, 2008), myopia (Reuters, 2009), and vitamin D deficiency (AAP, 2009). The good news is that outdoor activities kids love, like running, jumping, climbing, playing games with friends, and taking nature walks are a great strategy for keeping children healthy.

In addition, experts say, if we dig a little deeper—literally—there are even more benefits to be found. Playing in the dirt and even ingesting a little along the way, some researchers say, helps children build stronger immune systems. The Hygiene Hypothesis, first put forth in the 1980s, holds that when children are too clean and their exposure to parasites, bacteria, and viruses is limited early in life, they face a greater chance of having allergies, asthma, (Yazdanbakhsh, 2002) and other autoimmune diseases such as multiple sclerosis and type-one diabetes during adulthood (Platts-Mills, 2005).

While no one disputes the wisdom of basic, common-sense sanitation measures, such as washing hands and using hand sanitizer when soap and water aren't available, experts say some exposure to dirt and germs does not hurt children, and may very well help.



According to Dr. Joel Weinstock, director of gastroenterology and hepatology at Tufts Medical Center in Boston, "Children raised in an ultraclean environment are not being exposed to organisms that help them develop appropriate immune regulatory circuits." For their own benefit, Dr. Weinstock argues,

"Children should go barefoot in the dirt, play in the dirt and not have to wash hands when they come in to eat."

(Brody, 2009)



Bowman-2

Dr. Mary Ruebush, immunologist and author of *Why Dirt is Good: 5 Ways to Make Germs Your Friends*, counts letting kids play in the dirt as immune-system-building step number one. "Let your child be a child," she says. "Dirt is good. If your child isn't coming in dirty every day, they're not doing their job. They're not building their immunological army. So it's terribly important." (CBS News, 2009).

You know the smile on your child's face when he's covered in mud? Doesn't it just warm your heart? Well, it is benefiting his. Dirt, says a Northwestern University study, is good for children's cardiovascular health. Analyzing data collected from thousands of children over two decades, researchers have concluded that when children are exposed to germs and pathogens during infancy their risk of cardiovascular inflammation in adulthood, a precursor to heart attacks and strokes, is reduced. The study found that children who had early exposure to animal feces and infectious microbes like those found outside in soil resulted in lower levels of CRP, or C-Reactive Protein, a biomarker for cardiovascular problems, later in life. (Channick, 2010).

Being too clean also can be a liability for kids who get a lot of scrapes and cuts, which is pretty much all kids.

Luckily, dirt's benefits are skin-deep as well.

Researchers at the University of California School of Medicine, San Diego, found that a common bacterial species that lives on skin, *Staphylococci*, triggers a pathway that helps prevent inflammation, improving skin's ability to heal (BBC News, 2009).



Bowman-2

The Joy of Dirt

Playing in the dirt increases happiness, enhances learning.



According to a four-year study that examined approximately two million children under the age of 18, antidepressant use is on the rise in kids, with the fastest growing segment found to be preschool children aged 0-5 years (Delate, 2004). While not a substitute for medication, an increasing number of experts are recognizing the role of nature in enhancing kids' mental health. It's easy to see the effect when you watch children play outside. Kids are different when they're outdoors; free of school pressures and harried schedules, they relax and simply become kids. In fact, according to one study, children's stress levels fall within minutes of seeing green spaces, making outside play a simple, no-cost, and time-efficient antidote for an overstressed child (Kuo, 2004).

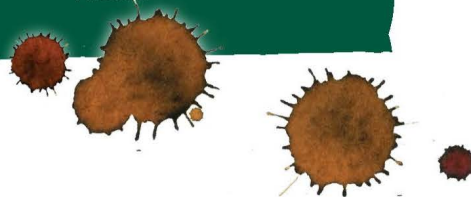
Studies now also show that going beyond seeing green spaces to touching them has a powerful and positive effect. Making direct contact with soil, whether through gardening, digging for worms, or making mud pies has been shown to improve mood, reduce anxiety, and facilitate learning.

In a study by Bristol University, *Mycobacterium vaccae*, or *M. vaccae*, a "friendly" bacteria found in soil, was shown to activate a group of neurons that produce the brain chemical serotonin, enhancing feelings of well-being, much in the same manner as antidepressant drugs and exercise. Interest in the study arose when patients treated with *M. vaccae* for another health issue reported increases in their quality of life (Lowry, 2007).



"The typical human probably harbors some 90 trillion microbes. The very fact that you have so many microbes of so many different kinds is what keeps you healthy most of the time."

Dr. Mary Ruebush, immunologist and author of *Why Dirt is Good: 5 Ways to Make Germs Your Friends*.



Bowman-2

The results, "leave us wondering if we shouldn't all be spending more time playing in the dirt," says the study's lead author Dr. Chris Lowry.



Beyond raising mood, time kids spend in the dirt may be the best preparation for the classroom, according to researchers at The Sage Colleges in Troy, New York. They wondered whether, in addition to its antidepressant effect, *M. vaccae* may also have an effect on schoolwork. "Since serotonin plays a role in learning, we wondered if live *M. vaccae* could improve learning in mice," says Dr. Dorothy Matthews who co-authored the study. What they found was the bacteria did, in fact, significantly improve learning, and, in addition, the mice demonstrated fewer anxious behaviors.

"This research suggests that *M. vaccae* may play a role in anxiety and learning in mammals," says Matthews. "It is interesting to speculate that creating learning environments in schools that include time in the outdoors where *M. vaccae* is present may decrease anxiety and improve the ability to learn new tasks." (Science Daily, 2010).



Bowman-2

Good Clean (Dirty) Fun

Dirty hands-on tips for parents and caregivers.

Getting messy is a win-win for children, because it's also **FUN**.
Here are some wonderful ways to get started.



Be an Artist

- Give your child a stick and a muddy surface to draw on. Mistakes are no problem; mud is a very forgiving medium. Just smooth them over and start again!
- Mud prints are fun too. Your child's muddy hands and/or feet can stamp cool patterns onto a sheet of paper. If you prefer to keep it simple, the sidewalk is another canvas.
- And then there's sculpture. Mud balls can become out-of-season snowmen or abstract sculptures. If your child's creation isn't sticking together, just add more water.

Be a Builder

- Your children can make buildings of all shapes and sizes if they use sticks to create a frame and pack mud on to it. Houses or forts perhaps, a castle with a moat, a stable to put toy horses in.
- If they also like the idea of large-scale public works, have them make a river by digging a trench in the mud or dirt. Then, add water as needed. Most importantly, build a dam to protect the town!



For more wonderful outdoor activities visit: www.BeOutThere.org/ActivityFinder

Bowman-2

Be a Biologist

- Take a walk through your neighborhood or a local park so your children can learn which animals go under cover during rain and which come out in this type of weather. You might not have pigs nearby, but some dogs will happily wallow in a mud puddle if they have a chance. You may also see birds swooping down to take a bath.
- This is also a fine time to study worms that surface to breathe when their burrows fill with water. Supply a magnifying glass so your children can get an even closer look. Then, enlist the kids in a Worm Rescue Squad. Ask them to move any worms they find on the sidewalk back to the dirt so they don't dry out.
- Now, help them build a worm hotel.

Be a Chef

- If you're going to play in the mud, why not make some mud pies? If you have some old cake or pie tins, great. Otherwise, shallow plastic containers work just fine. Once the pies are "baked," it's time to make them beautiful! Encourage your children to scour the yard for pebbles, petals, and leaves that will make perfect decorations on top.
- Collect dirt, grass, leaves, twigs, and acorns in a large container, and you have a bountiful nature salad. Add some water, and it's mud stew! (Remind small children to play with their dirt food, not eat it!)



Be a Gardener

- Little hands love to garden! Get some kid-size gardening tools and let kids help mom and dad plant vegetables—it's so exciting to watch them grow and it just might help kids eat more of them.
- Read *Growing Vegetable Soup*, by Lois Ehlert for inspiration.
- Let kids choose and plant flower seeds or bulbs. See if they can remember what colors they planted come spring.

Note: If there are concerns about toxins in your neighborhood soil, or if you don't want to dig up the yard, you can purchase an organic potting soil from a local gardening or landscaping shop and let kids play in that.

Got Galoshes?


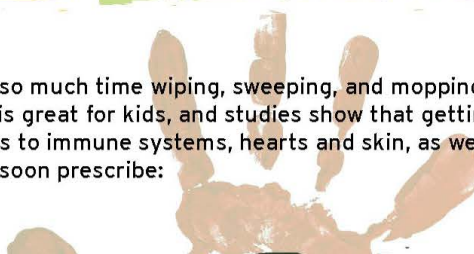
All you need for these filthy-fun activities are clothes you don't mind getting dirty and some mud! If it hasn't rained in a while, you can mix up your own with water and dirt. Remember to have clean clothes and some towels ready—and for heavy mud stains, rinse first outside with a hose before washing in the machine.

Bowman-2

Grime is Good

The last word on dirt.

Who would have thought something we spend so much time wiping, sweeping, and mopping away could be so good for kids' health? Spending time outside is great for kids, and studies show that getting dirty while they're out there might be even better. With benefits to immune systems, hearts and skin, as well as kids' emotional wellbeing and learning skills, doctors may well soon prescribe:



"Make two mud pies
and call me
in the morning."

Bowman-2

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Bowman-2

Join the Be Out There movement



National Wildlife Federation's (NWF) **Be Out There** is a national movement to give back to American children what they don't even know they've lost - their connection to the natural world.

With a wealth of activities, events, and resources, Be Out There reconnects families with the great outdoors to raise happy, healthy children with a life-long love of nature.

Join us and take the pledge to Be Out There
www.BeOutThere.org/Pledge

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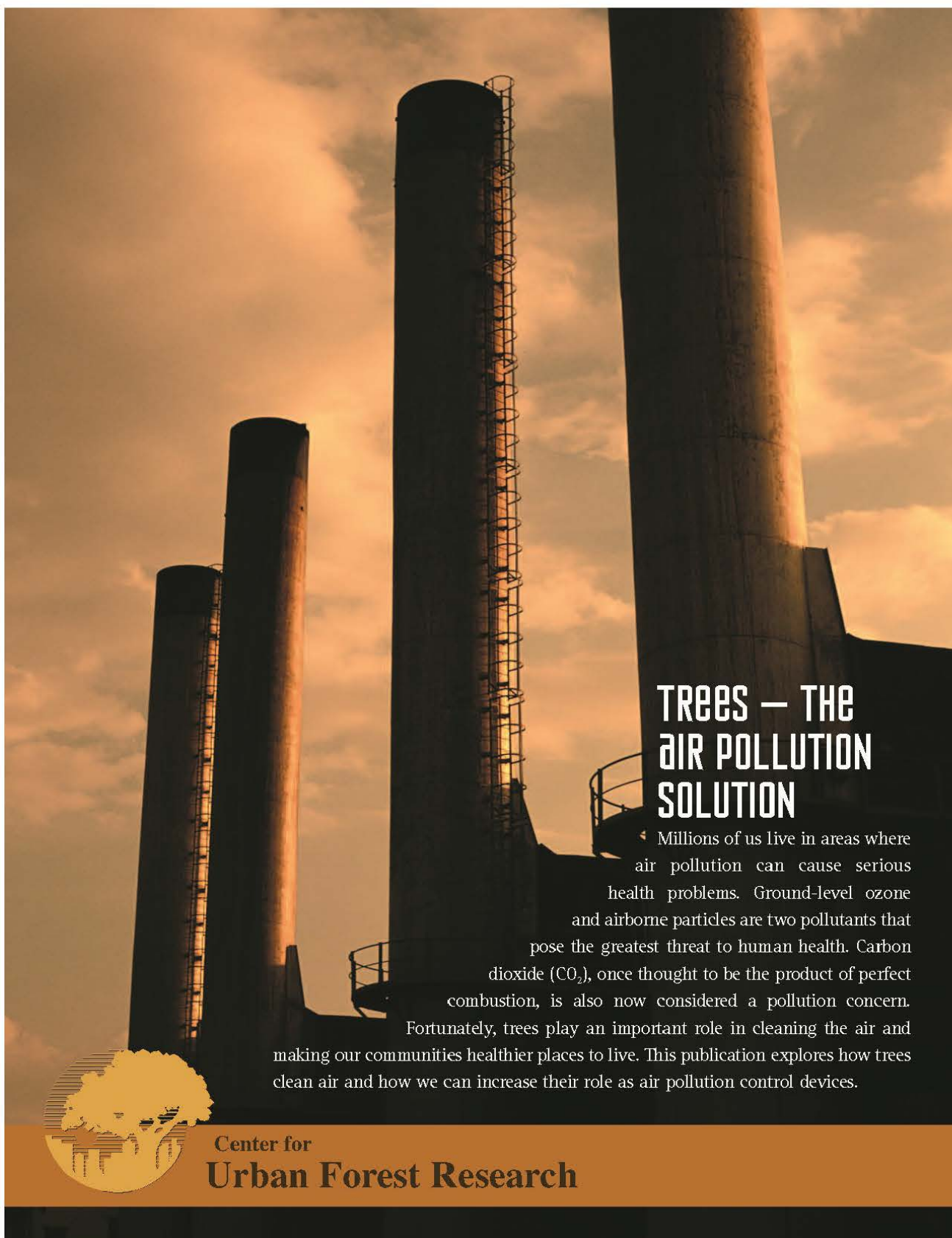
Bowman-2



**Rows of NAP Fencing
close access & mar aesthetics**
*unlike Golden Gate Park which boasts of
"NO Keep Off the Grass Signs"*




Bowman-2



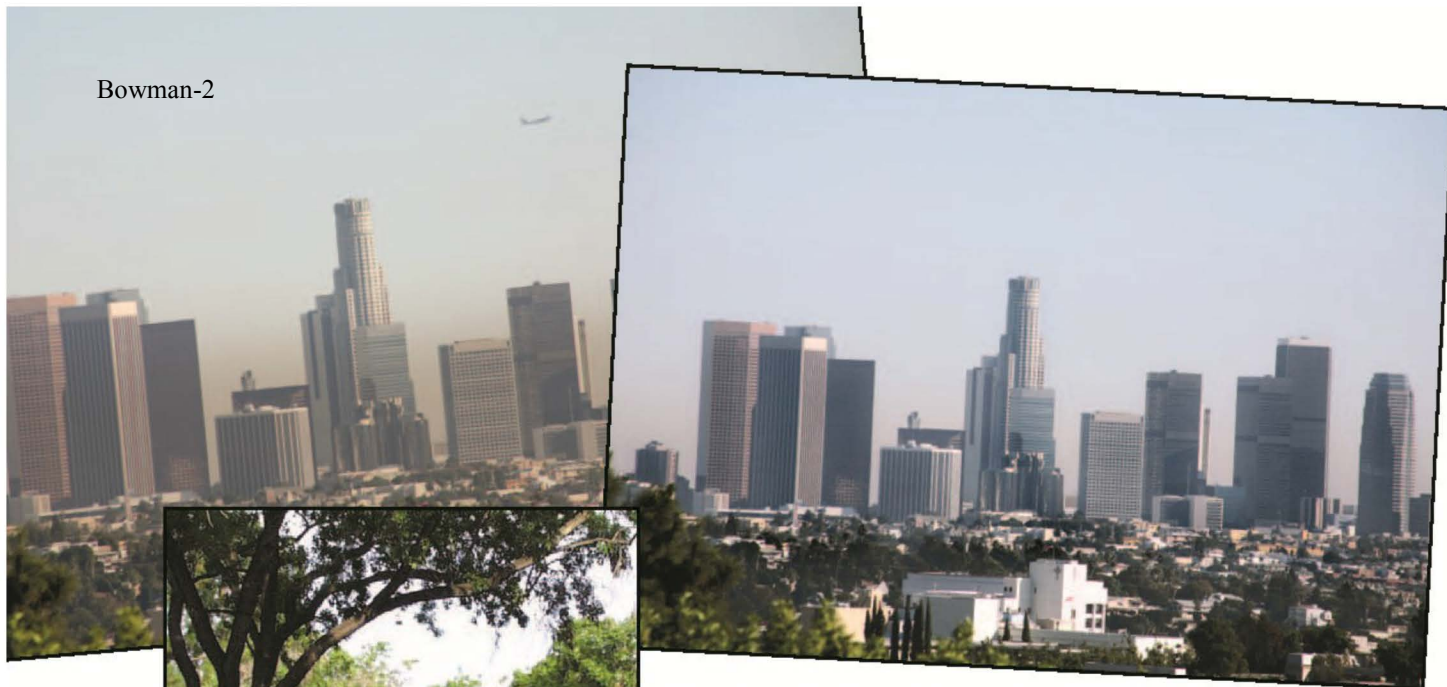
TREES — THE AIR POLLUTION SOLUTION

Millions of us live in areas where air pollution can cause serious health problems. Ground-level ozone and airborne particles are two pollutants that pose the greatest threat to human health. Carbon dioxide (CO₂), once thought to be the product of perfect combustion, is also now considered a pollution concern. Fortunately, trees play an important role in cleaning the air and making our communities healthier places to live. This publication explores how trees clean air and how we can increase their role as air pollution control devices.



Center for
Urban Forest Research

Bowman-2



THE TREE SOLUTION

CO₂ REDUCTION

Community trees reduce atmospheric CO₂ by storing it or by reducing demand for heating and cooling. On the other hand, vehicles, chain saws, chippers, and other equipment release CO₂ during the process of planting and maintaining trees. And eventually, all trees die and most of the CO₂ that has accumulated in their woody biomass is released into the atmosphere through decomposition. A comprehensive study of these “opposing” effects was conducted in Sacramento County, California. Its 6 million trees contribute to an annual net reduction of CO₂ by about 335,000 tons. Of that total, 262,300 tons of CO₂ remain sequestered in the trees. But, the encouraging piece of this annual reduction is that an additional 83,300 tons – nearly 25% of the reduction – is attributable to tree shade on homes, buildings, and other structures. The CO₂ released due to tree planting, maintenance, and other program-related activities is only about 2 – 8 percent of annual CO₂ reductions and the release of CO₂ through decomposition accounts for only another 1 percent. So, the total CO₂ released in Sacramento County is less than 10,600 tons per year.

OZONE & PARTICULATE REDUCTION

Three factors principally affect the uptake of ozone and particulates: concentrations of pollutants, canopy cover, and “surface roughness.” Sacramento County’s 6 million trees remove approximately 1,607 tons of air pollutants annually. As expected, they were most effective at removing ozone and particulate matter (PM₁₀). These trees removed 665 tons of ozone and 748 tons of PM₁₀.

WHAT IS THIS SERVICE WORTH?

Our findings indicate that the reduction of atmospheric CO₂ by the 6 million trees in Sacramento County has a current annual value of \$3.3 million. That means that each tree’s contribution is worth \$0.55/yr on average. The total value of the annual reduction of ozone and particle pollution is \$28.7 million, or nearly \$5 per tree on average. However, it is important to understand that even though trees are highly efficient at reducing air pollution, their contribution to the overall reduction of air pollutants is fairly small, amounting to only about 2 percent of the total emitted. Nearly 98% of air pollution is currently not being “treated” by trees.

THE POLLUTANTS

OZONE is not emitted directly, but is created by chemical reactions between oxides of nitrogen (NO_x) and volatile organic compounds (VOCs) in sunlight. The rate of ozone formation is increased by higher air temperatures. Emissions from industrial facilities and electric utilities, motor vehicle exhaust, gas vapors, and chemical solvents are some major sources of NO_x and VOCs.

PARTICULATES Particle pollution consists of microscopic solids or liquid droplets so small that they can be inhaled deep into our lungs, causing serious health problems. Most of them start as smoke and diesel soot and form in the air from NO_x and sulfur oxides (SO_x), even obscuring our visibility.

CO₂ is a greenhouse gas that traps the earth’s heat and contributes to global warming. Human activities add greenhouse gases to the atmosphere at a rate of about 3 percent of annual natural emissions – enough to tip the balance and overwhelm the environment.

Bowman-2

THE STRATEGY: The Planting Solution

Get trees into your State Implementation Plan:

1. Conduct a resource assessment. Assess the current canopy cover in your Air Quality Management District (AQMD). Determine how many potential sites could be successfully planted or regenerated.

2. Develop a range of planting scenarios representing business as usual, and selected future plantings to determine the impact of different species mixes and tree densities on air quality 10 to 40 years in the future.

3. Model the effects of planting scenarios on air quality. Using data in the canopy cover assessment, conduct a modeling analysis to account for the following:

- Impacts of air temperature changes on atmospheric chemistry including formation of ozone, other oxidants and particulate matter.
- Impacts of deposition (removal of pollutants from the atmosphere) changes on air pollutant concentrations.
- Impacts of increased tree cover on biogenic volatile organic compounds (BVOCs) emissions. Emissions of BVOCs are of concern because they are precursors to ozone and particulate matter formation.
- Impacts of avoided emissions changes. Avoided emissions may occur because of reduced urban temperatures resulting from increased tree cover. Examples include reduced mobile source emissions and reduced emissions related to power generation for air conditioning.

4. Develop a plan to increase tree canopy cover based on the modeling. Be sure to consider the number to plant, where to plant, species (particularly the high emitters of BVOCs), growth, ultimate size, maintenance requirements, and mortality. For information on tree selection go to: <http://selecttree.calpoly.edu>

5. Consider developing a database to account for new plantings and a change in tree canopy cover. This program evaluation will be required to verify that the estimated increase in canopy is attained. One idea being used in Houston is a web-based system for tracking new plantings.

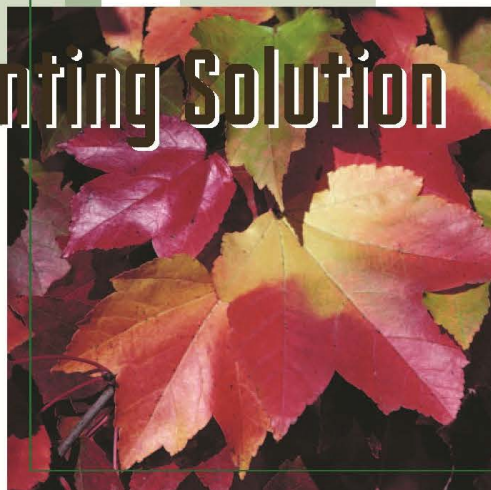
6. Submit measure within your State Implementation Plan (SIP). Since trees are new to the SIP process, work with your EPA regional office and local AQMD to develop your tree canopy enhancement program.

Consider both urban forestry options – new tree plantings and preservation of canopy.

1. New tree plantings include all trees added to your area, both public and private. Be sure to count any natural regeneration.
2. Preservation of canopy is a totally different approach. The goal here is to maintain existing canopy cover and you must demonstrate that canopy was preserved by incorporating various urban development strategies. In other words, a predetermined loss of canopy was avoided because of your intervention.

Increase the traditional tree planting programs in your state.

Don't stop what you are already doing. Make a good thing better.



Think extremely long term (40-50 years).

Once you have reached attainment, planting millions of trees to mitigate air pollution will be part of a long-term plan. Bad air quality is a regional problem that requires a regional solution, especially one requiring millions of trees. Communities must work together in public-private partnerships to achieve better air quality.

Develop a Greenprint project for your region or state.

Greenprint in the Sacramento, California region is a great example of how to establish a regional coalition. Greenprint invites a region's cities and counties to develop livable and sustainable communities by building the best urban forests. Adequate tree canopy contributes to a healthy community. For more on Greenprint go to:

http://www.sactree.com/aboutUs/programsServices/greenprint/STF_GP_broch_v12.pdf

Continue caring for and nurturing your existing trees.

They already provide the benefits you are seeking. The air pollution solution is to add more of them.

Follow the progress we are making as a nation.

Periodically visit our partnership website at: <http://www.treescleanair.org>

Bowman-2

RESOURCES

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McPherson, E.G., D.J. Nowak, and R.A. Rowntree. 1994. *Chicago's urban forest ecosystem: results of the Chicago urban forest climate project.* Part 2. NE GTR-186. Radnor, PA: USDA Forest Service, Northeastern Forest Experiment Station, 201. http://www.fs.fed.us/psw/programs/cufr/products/cufr_188_gtr186a.pdf

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Nowak, D.J. 2005. *Strategic tree planting as an EPA encouraged pollutant reduction strategy: How urban trees can obtain credit in State Implementation Plans.* Syracuse, NY: Northeastern Research Station, USDA Forest Service. P.7. http://www.wflcenter.org/ts_dynamic/research/22_pdf_file.pdf

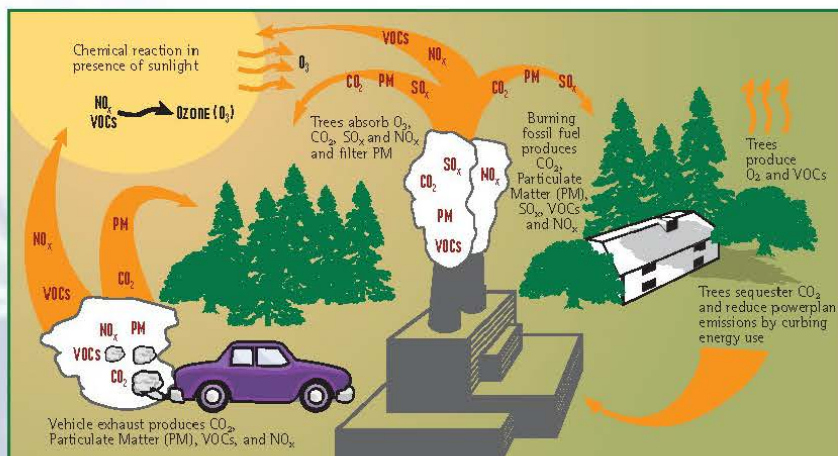
Scott, K.I., E.G. McPherson and J.R. Simpson. 1998. *Air pollutant uptake by Sacramento's urban forest.* Journal of Arboriculture. 24(4): 224-234. http://www.fs.fed.us/psw/programs/cufr/products/cufr_27_KS98_43.PDF

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THE TREE FACTOR - "GREEN CLEANS"

Trees absorb, bind, intercept, and sequester pollutants. They also reduce air temperatures, provide shade, and reduce winter wind to curb energy use.

Pollutants: Particulate Matter (PM), Carbon Dioxide (CO₂), Nitrogen Oxides (NO_x), Volatile Organic Compounds (VOCs), and Sulfur Oxides (SO_x)

Community trees help to reduce air pollution by:

- absorbing the gaseous pollutants through leaf stomata during the normal exchange of gases.
- binding or dissolving water soluble pollutants onto moist leaf surfaces.
- intercepting and storing larger particulates on outer leaf surfaces, the epidermis, which may be waxy, resinous, hairy, or scaly.
- capturing and storing particulates on the uneven, rough branch and bark surfaces.
- sequestering CO₂ aboveground in woody tissue and belowground in the roots.
- lowering local air and building temperatures through transpiration, shading, and reducing winter wind infiltration, thus lessening the demand for cooling and heating and the formation of ozone.

Planting Pollution Control

What an opportunity!

The contribution of trees could be substantially increased if we strategically plant a large number of trees and provide long-term stewardship to maximize their health and longevity. This will maximize their benefit potential and provide us with future energy savings and improved air quality. A study we conducted in 2002, and summarized in *Green Plants or Power Plants*, found that 50 million new trees in California would eliminate the need for seven new 100-megawatt power plants—and all of the resultant air pollution.



For Additional Information On:

Controlling air pollution with trees go to:

http://www.fs.fed.us/psw/programs/cufr/products/cufr562_Newsletter_Jan05_Special_Edition.pdf

Air pollution and the law go to:

http://www.epa.gov/oar/oaqps/peg_caa/pegcaain.html

The Clean Air Act go to:

<http://www.epa.gov/air/caa>

Brown-1

Bock, John

From: Jessica.Range@sfgov.org
Sent: Thursday, December 08, 2011 10:23 AM
To: Bock, John
Subject: Fw: My comments on the NAP EIR

Jessica Range, LEED AP
San Francisco Planning Department
Environmental Planning
1650 Mission Street, Suite 400
San Francisco, CA 94103
Phone: (415) 575-9018 / Fax: (415) 558-6409 www.sfplanning.org

----- Forwarded by Jessica Range/CTYPLN/SFGOV on 12/08/2011 10:23 AM -----

Bill
Wycko/CTYPLN/SFGO
V
To
Jessica Range/CTYPLN/SFGOV@sfgov.org
12/07/2011 10:13 AM
cc
Subject
Fw: My comments on the NAP EIR

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 12/07/2011 10:14 AM -----

zoie nicholas
<zoie_pa28@yahoo.com>
To
"bill.wycko@sfgov.org"
10/28/2011 11:01 AM
<bill.wycko@sfgov.org>
cc
Subject
Please respond to My comments on the NAP EIR
zoie nicholas
<zoie_pa28@yahoo.com>

Brown-1

Dear Mr. Wycko,

I am a senior who walks my dog in the dog park areas of Bernal Hill, McLaren Park and Lake Merced. I walk to maintain my health, social interaction and as my entertainment. I walk with my dog for safety. I am disappointed in reviewing the NAP EIR for the reasons cited below. I am an environmentalist, but I also believe in intelligence, reason and practicality. The issue of off-leash dogs is a significant one for me and I have become politically active around this issue as are thousands of other dog owners who are subject to the unreasonableness of your and the GGNRA plan.

I wish to to consider the following issues:

- 01 1) The NAP EIR provides no evidence to prove claims that dogs have an impact on plants and wildlife in natural areas. An EIR should be based on scientific evidence, and there is little presented here. Because the NAP EIR's analysis of impacts from dogs is not based on any evidence, the analysis is inadequate. Without any demonstrated evidence of impacts from dogs, there is no justification for excluding people with off-leash dogs from natural areas. There is, therefore, no justification for the closure of the DPA at Lake Merced, nor for the reductions in the DPAs at McLaren Park and Bernal Hill.
- 01 2) The NAP EIR does not take into account scientific studies that show off-leash dogs have little impact on plants and wildlife, including nesting birds when declaring that dogs have negative impacts. These studies were provided to the Planning Department by SFDOG in its comments on the Initial Study for the NAP EIR. Ignoring them shows that the NAP EIR is inadequate and inaccurate when it comes to dogs and "impacts."
- 01 3) The NAP EIR repeatedly says: Dogs MAY be impacting protected plant species or wildlife (pp. 297, 298, 305, 306, 472, 473, 502, 517), yet offers no evidence these impacts are actually occurring or ever have occurred. Unsubstantiated claims cannot be made in an EIR. After each of these examples, the EIR then goes on to say: Dogs MAY continue to impact plants or wildlife. If there's no proof of an impact, then that impact cannot "continue." EIRs must be based on observed impacts, not things that "may" happen. The analysis in the EIR based on this speculation is incorrect and inadequate.
- 01 (Cont.) 4) In several places, the NAP EIR says: Observations indicate dogs are impacting erosion, or plant damage, or damage to natural communities (pp. 471, 500, 505, 516, 519), yet offers no information on these "observations." Who made them? Were they done in a scientifically rigorous way? Were they made by people biased against dogs? We have seen with the GGNRA's attempts to get rid of dogs and with Point Reyes attempts to get rid of an oyster farm that reports by "observers" biased against dogs or oyster farmers do not stand up to independent scientific scrutiny. Is this the case here as well? We do not know, since the NAP EIR provides no information about them. Again, EIRs should be based on solid, scientific data, and definitely not on anecdotal "observations." If not, their analyses cannot be trusted and are inadequate.
- 02 5) The NAP EIR does not differentiate between impacts caused by people with dogs and impacts caused by people without dogs. Do people in the natural areas with dogs cause significantly more impacts than people in the natural areas without dogs? Clearly a 200-pound person will have a much more significant impact on plants than a 20-pound dog. Because this was not evaluated in the EIR, the analyses presented in the NAP EIR are inadequate.
If there is little difference in impacts, then the EIR cannot justify banning dogs from the natural areas.
- 03 6) The NAP EIR considers only the NAP plans to close 15% of the legal off-leash space in SF city parks when considering impacts on the remaining DPAs and on recreation. However, the NAP plan also calls for expanding the most sensitive areas within natural areas, and this potentially could result in the closure of significantly more DPAs (up to 80% of the total off-leash space currently available in city parks, off-leash space that is

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- 03 (Cont.) { located either within or adjacent to a natural area). These added closures (up to 80%) will significantly increase the impacts on recreation, on people with dogs, and on the remaining DPAs. These increased impacts were not considered in the EIR when it evaluated the Project Alternative, and without them, the analysis of the Project Alternative is incomplete and inadequate.
- 04 { 7) The NAP EIR acknowledges that the NAP plans to close 15% of the DPAs in city parks immediately, when added to the GGNRA's plans to cut off-leash access by 90%, will have a significant and unavoidable cumulative impact on remaining off-leash areas in city parks and on recreation. However, the EIR says that because they don't know the final GGNRA plan, they cannot analyze what that cumulative impact will be. We do know what the GGNRA originally proposed (cutting off-leash access on its lands by 90%) and the cumulative impact of that plan, when combined with the NAP closures can and should be analyzed. We saw on Tsunami Friday what the impacts could be. The GGNRA closed both Fort Funston and Ocean Beach to all visitors on the morning of Friday, March 11, 2011 because of concerns that a tsunami triggered by a major earthquake in Japan would strike the coast. The busiest weekend days normally find about 60 dogs at the Pine Lake DPA at any one time. Weekday mornings normally have far fewer, closer to 20. On Tsunami Friday, a Rec and Park Dept staffer counted over 200 dogs at the Pine Lake DPA at 10 am, almost 10 times more dogs than on a normal weekday and more than 3 times the maximum numbers of dogs seen on weekends. This example can be used to quantify the cumulative impacts of the GGNRA and NAP closures of off-leash space. The analysis presented in the EIR, which does not contain this, is inadequate.
- 05 { 8) The number of DPAs in city parks listed in the NAP EIR is wrong. Page 155 says there are 19 DPAs, when the actual number is 29. To get such a basic fact wrong is shocking and calls into question other information about dogs, such as their alleged "impacts" on plants and wildlife.
- 06 { 9) The NAP EIR incorrectly summarizes RPD's so-called moratorium on creating new DPAs until a systemwide survey of DPAs is conducted. The NAP EIR says that this moratorium was a directive from the Rec and Park Commission that was announced at the October 10, 2006 meeting of the RPD Dog Advisory Committee (DAC). This is not true. The idea of a systemwide survey of where dogs and DPAs are in San Francisco came not from the Commission, but from RPD staff. It was not discussed at the October 2006 DAC meeting. It was not fully discussed in the DAC until 2007 when RPD made the decision to "sunset" the DAC and conduct the citywide survey. While the survey was being conducted, the DAC was told, there would be a hold on new DPAs. The DAC was told the survey would take maybe a year or a year and a half at the most. The idea of the citywide survey was not presented to the Rec and Park Commission until mid-2007. This was no "direction from the Commission." This hold was never meant to be permanent. Yet the NAP EIR implies it will last for decades (the length of time covered by the NAP EIR) and therefore the EIR does not have to consider new DPAs. In the four years since the DAC was sunset, however, RPD has done nothing on the citywide survey. And now this inaction by RPD is being used to prevent the EIR from considering whether or not creating new DPAs to replace ones closed by NAP could decrease the impacts of the closures. The NAP plan will last for decades, and for the NAP EIR not to consider a major mitigation like opening new DPAs to replace closed ones because of a temporary halt on new designations is absurd. Any analysis of alternatives that does not include this possible mitigation is incorrect and inadequate.
- 07 { 10) The NAP EIR assumes that, because the DPAs at McLaren Park and Bernal Hill are not being closed completely, the 15% closures will not cause a significant number of people to drive to other parks to walk their dogs. People will just walk in different parts of the parks that are still off-leash, the EIR assumes. However, the NAP EIR does not take into account the topography of the remaining land in the two DPAs. If what is left is mostly steep hills, people will not be able to walk there with their dogs. Thus, even though the acres of off-leash space may remain relatively high in these two parks, the amount of space that is practically available for off-leash access may be much less. This will increase the impacts on recreation and also will make it more likely that people will be forced to drive to other parks to walk their dogs off-leash. This must be included in the analysis of any and all alternatives. Since it is not, the analysis in the NAP EIR is inadequate.
- 08 { 11) The NAP EIR does not adequately consider the impacts of the use of

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- 09 (Cont.) { herbicides, especially Garlon, on dogs who walk either within or adjacent to natural areas (this applies whether the dog is on- or off-leash). In a paper on the effects of Garlon, the Marin Municipal Water District (http://www.marinwater.org/documents/Chap4_Triclopyr_8_27_08.pdf) notes that Garlon can cause kidney problems in dogs because of their limited physiological ability to excrete weak acids such as those in Garlon in their urine (they are somewhat unique among mammals in this). The NAP's reliance on herbicides to speed the removal of non-native plants in natural areas will have a negative impact on the health of dogs walked where it has been applied. This is especially true in Glen Canyon, where Garlon was applied over 30 separate times last year. This impact was not considered in the Hazards and Hazardous Materials section of the NAP EIR and a discussion of the health impacts on dogs of repeated exposure to Garlon should be included.
- 10 { 12) The NAP EIR says that the impact of people driving to other parks to walk their dogs because of the closures of 15% of off-leash space at Lake Merced, Bernal Hill, and McLaren Park will be less than significant because there will remain sufficient off-leash space in those parks (except for Lake Merced). However, the EIR does not consider the impact of people driving to other parks if 80% of the legal off-leash space in city parks is eventually closed because NAP claims impacts from dogs. This must be included in the analysis of the Project Alternative, and will likely show a much more significant impact than what the EIR now shows.
- 11 { 13) The NAP EIR refers to dogs as "nuisances". The EIR does not consider any positive aspects of dog walking, including the physical and mental health benefits to people who walk with their dogs. This lack is especially noticeable in sections dealing with impacts on recreation of the various alternatives considered. The reason so many people walk their dogs off-leash in Bernal Hill and McLaren Park is that those areas are large enough that people can hike long distances with their dogs off-leash. The majority of DPAs in city parks are too small for similar hikes. You can play fetch with a dog in these smaller DPAs, but not take a long walk. You cannot have the same recreational experience in a small DPA that you can have in a larger one; DPAs are not interchangeable. This difference in DPAs creates a significant impact on the recreational experience for dog walkers if the DPAs in Bernal Hill or McLaren Park are closed. In addition, there would be a significant negative impact on the physical and mental health of dog walkers if 80% of off-leash space were closed because NAP claims impacts from dogs. This is not considered in the NAP EIR, which is inadequate without it. These negative impacts on the physical and mental health of dog walkers of the 80% closure will be amplified considerably when combined with closures of off-leash in the GGNRA. This must be considered in the cumulative impacts sections.
- 12 { 14) The NAP EIR does not adequately analyze mitigations should any impacts from dogs be proven other than closing the DPA. Fences are mentioned briefly, while DPA closures are featured prominently in the EIR. Other mitigations – education, signage, more extensive fencing, etc. – are not discussed. NAP seems to go straight from a single impact to closing the DPA.
- 13 { 15) The NAP EIR states that impacts to land use planning can be considered significant if they have a "substantial impact on the existing character of the vicinity." (p. 176) In all of its analysis of impacts on the existing character of the vicinity, the NAP EIR never considers the impact on the social community of people who walk with their dogs in the DPAs and portions of DPAs that NAP wants to close. This community, in many cases, defines the "existing character" of the park. Dog walkers are perhaps the most diverse group of park users. If you watch dog walkers in SF city parks, you will see kids and seniors, people with disabilities, gay and straight, every ethnic and religious group, and every socioeconomic class walking, talking and laughing together, all united by their common love of dogs. There are few places in San Francisco where you will see so many different types of people interacting without rancor. People who walk in the same park at the same time every day know their fellow dog walkers. These friendships extend outside the park into the neighborhoods, helping create the sense of belonging to a community that is so important in today's impersonal urban society. Closures and reductions in DPAs (especially if 80% of the total off-leash space in city parks are closed) will have a significant negative impact on these social communities. DPA closures will destroy these communities. Because the NAP EIR did not consider these impacts on community of those who live near and walk in parks, it is inadequate.
- 13 (Cont.) {

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- 14 { 16) The NAP EIR does not adequately consider the impacts on the social fabric of San Francisco if one-quarter of its city parklands are closed to residents. Natural areas are not generally accessible to people, whether they have a dog or not. The NAP plan calls for the closure of many trails and reduction of recreational access. You cannot play catch with your child, have a picnic lunch, or play with a dog in a natural area. It can only be a plant museum. The EIR does not adequately consider the significant impact on families and the sense of shared community that access to parks fosters in our urban setting.
- 15 { 17) The NAP EIR does not adequately analyze the impacts on recreation of NAP plans to plant sensitive plant species (those that are listed as either endangered or threatened) throughout its natural areas. These plants, by virtue of their special status, trigger automatic federal and state protections, the primary one of which is severe restrictions on access to people and dogs. The NAP goal to preserve existing remnants of historical habitat does not require the planting of threatened and endangered species.
- 15 { 18) The NAP EIR does not consider impacts on recreation and land use from the fact that NAP controls the entire park in over half of the parks (18 of 32) where there is a natural area. No other recreational use is possible in those parks. In an additional 10 parks, NAP controls over 50% of the land.
- (Cont.) { Only four of the 32 parks with natural areas have less than 50% of their land controlled by the NAP. A majority of land under NAP control citywide (57%) will have significant restrictions to access by all people (not just people with dogs); that is the amount of land designated as MA-1 and MA-2.
- 16 { In 8 parks, all of the land in the natural area are designated as MA-1 and MA-2, with resulting significant restrictions on access to everyone. In some cases, this denial of access will be in the only park within easy walking distance in the neighborhood. The NAP EIR must consider this large-scale denial of access when analyzing the Project Alternative.
- 17 { 19) The NAP EIR does not adequately consider the negative impacts on aesthetics and land use of poor maintenance in natural areas. In most parks, the NAP plan allocates fewer than 20 days/year for planting/maintenance of the natural areas. In 16 of the 32 natural areas, 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. The NAP EIR should have considered the impacts of scaling back the program to a few areas that can be well maintained, as opposed to the current plans to take over one-quarter of San Francisco's city parkland. The NAP plan is 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.
- 18 { 20) The NAP EIR does not consider the negative impact on aesthetics of NAP management decisions. For many people, brush piles used in natural areas look like accumulations of trash and are aesthetically unpleasing.
- 19 { 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. Because these impacts were not considered, the NAP EIR is inadequate.
- 21) The NAP plans call for cutting down over 18,000 healthy trees simply because they are not native. The NAP EIR does not adequately consider the long-term impacts on climate change and global warming of the conversion of land covered by trees with grasslands. Tree are much better at carbon

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19 { sequestration than grasslands, and the long-term consequences of this difference are not adequately considered. For
(Cont.) { more on NAP impacts on trees,
see: <http://milliontrees.wordpress.com>

20 { 22) The NAP EIR does not adequately consider the fact that the climate in
San Francisco has changed (and continues to change) from the time several hundred years ago that the NAP plan is
trying to re-create. Native plants suited to the earlier climate may no longer be suited to today's (and
tomorrow's) climate. The NAP EIR does not consider the lack of sustainability of trying to re-create what the habitat was
at one snapshot in time when the climate has changed since that time. The environmental consequences (for example,
more herbicides, etc.) of trying to force the old habitat into today's climate should be analyzed more thoroughly.

Sincerely, Judith Brown

=====

The Planning Department will have reduced services available the last week of December 2011. In addition to the regular observed legal holiday on Monday, December 26, 2011, most Planning Department offices will be closed on December 27, 28, 29, & 30. On these dates, only the Planning Information Center (PIC), located on the 1st floor of 1660 Mission Street, will be open normal business hours as follows:

Tuesday, December 27, 2011: 8:00 AM to 5:00 PM Wednesday, December 28, 2011: 8:00 AM to 5 00 PM Thursday, December 29, 2011: 8:00 AM to 5 00 PM Friday, December 30, 2011: 8:00 AM to 5:00 PM Please note that the PIC will have reduced staffing on these days. The PIC phone number is (415) 558-6377. The Planning Department will resume full services on January 3, 2012.

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Browne-1

**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 09:13 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: NAP EIR

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:14 AM -----

**Luke Browne**

<playitagainsam.sfdog@gmail.com>

10/31/2011 01:01 AM

To bill.wycko@sfgov.org

cc David.Campos@sfgov.org, mayoredwinlee@sfgov.org

Subject NAP EIR

Dear Mr. Wycko,

I am a home-owner in Bernal Heights and have lived in this neighborhood since 1995. Bernal Heights is one of the most beautiful sections of this city and I have never considered any other place to live.

01

My family and I have been walking our dogs on Bernal Hill for as long as we've lived here. The proposals in the NAP EIR would drastically impact our use and enjoyment of this area. I have read the NAP EIR and believe it's assessments and suggestions are faulty, to say the least.

02

For example, I witnessed some of the people "studying impacts by people with dogs". I even spoke with them. They were not conducting studies based on solid, rigorous science. They weren't even scientists! Having walked up there for the last 15 years, I could have given you more accurate information, based on long-term observations. For instance, the main culprits to ground erosion are rainwater, gophers, and certain species of invasive plants. I have watched, over time, the impact these have had on the hill, and it has been significant. Many of the Bernal residents spend time every year pulling these damaging plants. I have pulled entire sections and am happy to have seen no return, even after five years, at no cost to the city!

03

When I first started walking on the hill with my dogs, I'd run into the same neighbors at the same hours everyday. Now that more people in the city have discovered the hill, it has become a popular place for many. In fact, many users are refugees from various city parks that only allowed on-leash recreation for there dogs. They were **told** they could find off-leash walking on Bernal Hill. And so they came. And it's a wonderful refuge in this city.

As far as the impact of people walking their dogs, the majority stay on the paved road or the designated paths. We don't have a problem of dogs digging that I have seen in other parks. Dogs are having a minimal impact on this area. The new signs that have been placed at the beginning of the park have been helpful in explaining how to use the park in these sustainable ways. Most our willing to comply. In other words, this community has been using this hill in a responsible and sustainable way for many years, with very little intervention.

04

This report is another misguided attempt at "improving" or "saving" an area that needs no

Browne-1

04
(Cont.) { improvement, let alone saving. It may need some management, but not based on this report and not by this group of "experts". We are a small SF community that is doing just fine preserving this beautiful hill. I don't appreciate my tax dollars being wasted on this study and it's recommendations to remove large areas of land from public use. Remember, this is an urban environment and we need to find sound, balanced solutions that fit.

Sincerely,
Luke Browne

Browning-1



Bill Wycko/CTYPLN/SFGOV
10/31/2011 11:52 AM

To: Jessica Range/CTYPLN/SFGOV@SFGOV
cc
bcc
Subject: Fw: please save off-leash dog areas

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 11:53 AM -----



Nadine Browning
<nbardol@gmail.com>
10/31/2011 11:52 AM

To: Bill.wycko@sfgov.org
cc
Subject: please save off-leash dog areas

01 {
Hi Mr. Wycko
I am writing you today to beg you to reconsider the plan to eliminate or reduce off-leash dog areas in the city. These areas are so important to the mental and physical health of our dogs and our people. Please don't let this flawed report by the NAP convince you to take such drastic measures. Please be the voice of reason. You must listen to the howling of the dogs and the people!
Thank you.

Browning-2



Bill Wycko/CTYPLN/SFGOV

10/31/2011 11:42 AM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject: Fw: Save Off-leash Dog Areas

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 11:42 AM -----



nadine browning
<nadinebrowning@yahoo.com>

10/31/2011 11:35 AM

Please respond to
nadine browning
<nadinebrowning@yahoo.com>

To: "Bill.wycko@sfgov.org" <Bill.wycko@sfgov.org>

cc

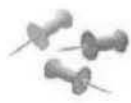
Subject: Save Off-leash Dog Areas

01

I implore you to reconsider the NAP EIR plan. I have 3 dogs, all of them rescued, and I the off-leash areas in the bay area are crucial to their well-being. I take them to Ft. Funston, Bernal Hill, McLaren Park, Alamo Square Park, Glen Park, Dolores Park, Alta Plaza Park, Golden Gate Park, Esprit Park, McKinley Park and Stern Grove. I am diligent about picking up after my dogs, and about making sure the dogs are not destroying the vegetation. I pick up after other people's dogs when I see it has been left there. Even if you don't care about dogs, you must recognize that eliminating these areas will have a SIGNIFICANT negative impact on the people who live with these dogs. Please do not let this happen.
Nadine Browning

Make a Small Loan, Make a Big Difference - Check out Kiva.org to Learn How!

Browning-3



Bill Wycko/CTYPLN/SFGOV
10/31/2011 11:34 AM

To: Jessica Range/CTYPLN/SFGOV@SFGOV
cc:
bcc:
Subject: Fw: STOP THE NAP EIR PLAN

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 11:35 AM -----



nadine browning
<nadinebrowning@yahoo.com>
10/31/2011 11:26 AM

To: "Bill.wycko@sfgov.org" <Bill.wycko@sfgov.org>
cc:
Subject: STOP THE NAP EIR PLAN

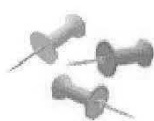
Please respond to
nadine browning
<nadinebrowning@yahoo.com>

01

PLEASE, PLEASE, PLEASE don't do this! The NAP EIR seems to be biased speculation; how can you drastically reduce the off-leash dog areas for thousands of dogs based on speculation? Please consider the impact of this plan on the citizens and the remaining dog parks. DO NOT DO THIS! I am begging you!
Nadine Browning
dog lover

Make a Small Loan, Make a Big Difference - Check out Kiva.org to Learn How!

Buckley-1

**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 04:07 PM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: Rec and Parks NAP EIR is inadequate

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 04:08 PM -----

**K Buckley**

<buckleyk98@yahoo.com>

10/31/2011 04:01 PM

Please respond to

K Buckley

<buckleyk98@yahoo.com>

To "bill.wycko@sfgov.org" <bill.wycko@sfgov.org>

cc "mayoredwinlee@sfgov.org" <mayoredwinlee@sfgov.org>,

"David.Campos@sfgov.org" <David.Campos@sfgov.org>

Subject Rec and Parks NAP EIR is inadequate

Dear Mr. Wycko,

I live in the Mission and since the Mission is short on green space that is suitable for hiking, one of my main sources of exercise is walking my dogs at Bernal Hill and Glen Park. As a past victim of crime, my dogs are crucial to me getting this exercise since they make me feel safe and give me the confidence to visit the Hill or Glen Park even when there may not be very many people around. We walk in these parks pretty much every evening - having off leash dog space allows me and them the exercise we need to keep healthy. This is crucial for me because I do not have children, and I emigrated here far away from my family, therefore my dogs are a major source of personal happiness and comfort to me.

I urge you to oppose any measures to take away these wonderful off leash resources from dog owners and their pups. In addition,

I think the NAP EIR is inadequate and that additional work must be done:

- 01 { 1) The NAP EIR defines dogs as "nuisances". The EIR does not consider the impacts of DPA closures (especially the 80% potential closures) on the physical and mental health benefits of people who walk with their dogs. The EIR does not consider the impacts of DPA closures (especially the 80% potential closures) on the social community of dog walkers in parks and in the neighboring communities surrounding the parks.
 - 02 { 2) The NAP EIR repeatedly says: "dogs MAY be impacting" plants or wildlife, yet offers no evidence that any impacts are actually occurring now or ever have occurred. An EIR must be based on solid scientific evidence. Because the NAP EIR's analysis of impacts from dogs on plants and wildlife is based on unsubstantiated claims, the analysis is inadequate.
 - 03 { 3) The NAP EIR's analysis of the impacts of the closure of all or part of Dog Play Areas (off-leash areas) is inadequate. The NAP EIR must consider the impacts on other DPAs and other parks, on recreation, and on transportation, global warming and climate change because people must drive to other DPAs because of DPA closures if up to 80% of the total off-leash space in city parks is closed (the amount of off-leash located either within or adjacent to natural areas).
 - 01 { 4) The NAP EIR defines dogs as "nuisances". The EIR does not consider the impacts of DPA closures (especially the 80% potential closures) on the physical and mental health benefits of people who walk
- (repeated)

Buckley-1

- 01 [with their dogs. The EIR does not consider the impacts of DPA closures (especially the 80% potential
(repeated)] closures) on the social community of dog walkers in parks and in the neighboring communities
surrounding the parks.
- 04 [5) The NAP EIR does not consider impacts on recreation of NAP plans to plant threatened and
endangered species throughout the natural areas. Because of their special status, these plants trigger
automatic restrictions on access and, therefore, have much more negative impacts on recreation and
access than planting native plants that are not threatened or endangered.
- 05 [6) I support the Maintenance or Maximum Recreation Alternative, which the EIR identifies as being
environmentally superior alternatives.

Regards,
Kathy Buckley

Buffa-1

Andrea Buffa
620 Joost Avenue
San Francisco, CA 94127
andreabuffa2006@gmail.com

Oct. 29, 2011

Bill Wycko, Environmental Review Officer
SF Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103
bill.wycko@sfgov.org

To Mr Wycko:

01 { I'm writing to respond to the Natural Areas Program Environmental Impact Review. I strongly oppose the expansion of the Natural Areas Program and support the maintenance alternative described in the EIR.

02 { I am a dog owner, like so many other San Francisco residents. The Natural Areas Program already plans to eliminate dog play areas in San Francisco city parks, and if it is expanded, it could eliminate large swaths of off-leash dog walking areas at McLaren Park and Bernal Hill. I walk my dogs in these parks and appreciate the fact that they are large enough that I can get some exercise while also exercising my dogs. If these large off-leash areas are made smaller or eliminated, it will negatively impact me and thousands of other dog enthusiasts in San Francisco.

Meanwhile, there is currently no way for San Francisco residents to propose new dog play areas in city parks. Thus the NAP could take away our current areas and leave us with no way to propose new dog play areas.

San Francisco is a city with limited open space. I rely on the open spaces we do have to get out into the outdoors and get some exercise. We cannot afford to give up recreational space in San Francisco to make way for more native plants. Less recreational space will negatively impact the quality of life in our city.

03 { I urge you to implement the maintenance alternative and not to implement the maximum restoration alternative or any other alternative that will take away recreational space in San Francisco city parks.

Sincerely,

Andrea Buffa

Burgard-1

JUN-13-2012 12:00 From:

4154470619

To: 5586409

Page: 1/1

RECEIVED

June 10, 2012

Bill Wycko
 Environmental Review Officer
 San Francisco Planning Department
 1650 Mission St., Suite 400
 San Francisco, CA 94103
 Fax: ~~588-6409~~ 558-6409

JUN 12 2012
 CITY & COUNTY OF S.F.
 PLANNING DEPARTMENT
 M E A

Re: Natural Area Plan, Mount Davidson

01

As a resident of Miraloma Park since June 2003, we have been able to regularly enjoy the beauty of the forested hill of Mount Davidson both from accessing the trails for hikes and explorations with our family and from the windows of our home on Molimo Dr. We fill that the plan to deforest the hill of mature trees to return the area to native plants is an ill-conceived venture as the park has a natural beauty and ecology that is well serving the community that surrounds it.

02

Further, the native ecology of the hill has been in flux for millions of years. It is true on our planet that ecological conditions have changed, at times, over thousands of years as well as in much shorter periods.

03

The claim that the existing flora presents a fire hazard has been reasonably cast into doubt as the natural ecology is that of a cloud forest with high moisture.

04

The drastic measure of taking down long standing mature trees to replace them with natives that will take years to establish themselves will undoubtedly have a negative impact on the aesthetics of the park area. Moreover, it will devastate a thriving ecosystem based on the microclimate created by the existing forest.

We ask that the Planning Department reconsider its plan to remove trees from Mount Davidson and spend the resources on improving access to the open area with improved trails, interpretative signage, and benches.

Joe Burgard

Suzanne Kirrahe

31 Molimo Dr.
 San Francisco, CA 9412

Butler-1



Bill Wycko/CTYPLN/SFGOV

10/31/2011 09:20 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: PRESERVE OFF-LEASH ACCESS IN CITY PARKS!

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:20 AM -----



"Barbara Butler"

<barbara@barbarabutler.com>

>

To <bill.wycko@sfgov.org>

cc

10/30/2011 05:47 PM

Please respond to
<barbara@barbarabutler.com>

Subject PRESERVE OFF-LEASH ACCESS IN CITY PARKS!

To:

Bill Wycko, Environmental Review Officer
SF Planning Dept.
1650 Mission St., Suite 400
San Francisco, CA 94103

Re:

public comment on the NAP EIR

Bill,

01

We are opposed to the elimination of off-leash dog walking as proposed in the NAP EIR.

We have walked our dogs off-leash since 1989 without incident or without harming the natural habitat of many of the parks, including Glen Park, Bernal Heights, McLaren Park, as well as the GGNRA Beach areas – Fort Funston, Crissy Field & Ocean Beach.

02

After reviewing the NAP EIR, we find that no evidence is offered that dogs do have a negative impact on the plants and wildlife in the natural areas. Where is the evidence?

01

(Cont.)

We walk our dogs as our way of enjoying the parklands. As taxpayers, we are opposed to NAP's attempts to stop us from exercising and enjoying the parks, especially since there is no proof that dogs off-leash cause harm to plants & wildlife.

Those of us who walk dogs are a community and it is a diverse & fun community where we get to interact with people from all backgrounds and form bonds & friendships. DPA closures would severely impact this and for no clear reason!

03

We are also opposed to NAP's plans to cut down perfectly healthy trees and the growing use of pesticides to achieve their "native" environment.

Please preserve our off-leash dog access in City parks!

Sincerely,

Barbara Butler & Jeffrey Beal
2703 20th St.
San Francisco, CA 94110

Cabada-1

Oct. 29, 2011

Bill Wycko, Env. Review officer
 SF Planning Department
 1650 Mission Street, Suite 400
 SF, CA 94103

RECEIVED

OCT 31 2011

CITY & COUNTY OF S.F.
 PLANNING DEPARTMENT
 MEA

Comments to the draft DEIR for the SNRAMP

01

Please accept the report for it is a long worked on and comprehensive review of the plan.

It is very important to save the last few public areas we still have that support native plants. Native plants are not only beautiful but also support our wildlife ^{life} (insects, bees, birds). Lets keep some of it for future generation.

Sincerely
 Ingrid Cabada
 434 Fair Oaks
 SF, 94110
 ingridcabada@yahoo.com

Campbell-C-1



Bill Wycko/CTYPLN/SFGOV

10/31/2011 04:12 PM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: SNRAMP DEIR

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 04:13 PM -----



Christopher Campbell

<christopherpc@mac.com>

10/31/2011 03:19 PM

To bill.wycko@sfgov.org

cc

Subject SNRAMP DEIR

October 31, 2011

Bill Wycko,

Environmental Review Officer,

San Francisco Planning Department,

1650 Mission Street, Suite 400,

San Francisco, CA 94103

Dear Mr. Wycko,

I am writing regarding the Draft Environmental Impact Report (DEIR) for Significant Natural Resources Management Plan (SNRAMP). I am a Graduate Student at SFSU, working toward a degree in Resource Management and Environmental Planning. I have fourteen years experience working in San Francisco's Natural Areas. I have found our natural areas to be a tremendous biological, educational and recreational resource.

01

I reviewed the DEIR and feel it is an accurate and complete review of the SNRAMP. The plan reflects years of research and community input, incorporating scientific studies and expert opinions. The plan provides guidance for prioritizing restoration and management, enhancing biodiversity while maintaining populations of sensitive species.

Campbell-C-1

- 02 { The DEIR considers a broad range of potential impacts to San Francisco's natural resources while providing guidelines for passive recreational uses compatible with natural resources. In addition, it proposes mitigation measures to address impacts where possible.
- 03 { The City's SNRAMP is truly an innovative plan that will improve wildlife habitat, access, and recreational uses while increasing safety. This comprehensive plan is the most cost effective method of managing our resources and protecting lands for future generations.

Thank you for supporting the DEIR in it's entirety.

Christopher Campbell

59 Hazelwood Avenue

San Francisco, CA 94112

Campbell-N-1



Bill Wycko/CTYPLN/SFGOV
10/31/2011 04:37 PM

To: Jessica Range/CTYPLN/SFGOV@SFGOV
cc:
bcc:
Subject: Fw: 2005.1912E Significant Natural Resource Areas Management Plan

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 04:37 PM —



"norma campbell"
<sqrlady@hotmail.com>
10/31/2011 04:26 PM

To: <bill.wycko@sfgov.org>
cc:
Subject: 2005.1912E Significant Natural Resource Areas Management Plan

01

Mr. Wycko: I no longer live in San Francisco but I was born there as was my Mother and Grandparents. My Grandparents used to tell me of the wind and the blowing sand when the dunes were planted with only the small natural dune plants. They were always so grateful when other types of planting even though non-native were planted. Those plantings saved the dunes from tragic sand erosion, sand blowing that matched the dust bowl.

Do you really want to be responsible for a repeat of that.

Leave the plantings as they are, some of the planting may not be native species but they are mature, hold down the soil, feed the bees which are having a very hard time and on which a great majority of our food pollination depends, provide nectar for the Monarchs and Hummingbirds not to mention the vast numbers of songbirds and migratory avian species.

We do not need to be part of the hysteria over native vs non-native. The plantings as they are serve our area well in many many ways.

Norma Campbell, a native San Franciscian and Californian
37 Decorah Lane
Campbell, California 95008 408-559-7379

"Only after the last tree has been cut down
Only after the last river has been poisoned
Only after the last fish has been caught
Only after the last wolf, buffalo and wild horse has been killed
Only then will we find that money cannot be eaten." Cree Nation

Carrington-1

From: [Bill Wycko](#)
To: [Jessica Range](#)
Subject: Fw: Off leash restriction proposals
Date: 10/05/2011 09:06 AM

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/05/2011 09:07 AM -----

"Rick Carrington"
<rcarrington@sbcglobal.net> To: <bill.wycko@sfgov.org>
cc
10/04/2011 11:18 PM Subject: Off leash restriction proposals

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

Dear Mr. Wycko,

01 { I am a San Francisco resident of many years standing now and for a long time have also lived with and roamed with a dog. I wish to go on record against the proposed restrictions. First, if one were to look at old photographs of this City there were sand hills and rather barren landscape in many of the areas now being proposed for "restoration." This city needs to respond to the needs of its current residents and not turn its back on us.

02 { Second: restricting and narrowing the areas in which we can take our dogs off leash is in effect setting up ghettos for us. As the areas remaining become more crowded (as Upper Douglass Park is already becoming) the turf and quality of existence not just for the plants but for the people being packed inside diminishes. The wear and tear on the ground cover cannot withstand such heavy use. Some of that overburden is the result of dog walkers with limited options for off leash places and dogs needing exercise; but the limitations will also force more people into these remaining areas.

03 { Suggestions that this added burden can be addressed with added monitoring are ludicrous. As the dust and dirt swirl up just what is going to be done? Hose us all down? Rather than propose closures and restrictions the City should step up and improve its maintenance of these areas. There seems to be a disregard for the condition of many dog parks, orphans of the City. Shame.
Yours truly,
Richard Carrington

Caskey-1

From: Bill Wycko
To: Jessica Range
Subject: Fw: Keep our Dog Play Areas!!!
Date: 10/05/2011 09:45 AM

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/05/2011 09:45 AM -----

Julie Caskey
<julie@juliecaskey.com>

To bill.wycko@sfgov.org
cc

10/05/2011 09:35 AM

Subject Keep our Dog Play Areas!!!

01

Closure or restriction of our dog parks, specifically Bernal Hill, would be devastating to the Bernal community.

We are responsible dog owners, and want to express our *ernest* desire to maintain access to Bernal Hill, and all other existing DPAs with our dogs.

Sincerely,
Julie Caskey
136 Andover Street
San Francisco, CA 94110

Caughman-1



"Erin Caughman"
<erin.caughman@att.net>

06/10/2012 09:55 PM

Please respond to
<erin.caughman@att.net>

To <jessica.range@sfgov.org>

cc

bcc

Subject Comment Re: 20050912E Significant Natural Resource
Areas Management Plan

Ms. Jessica Range:

01

I am concerned about preservation of both native and non-native resources discussed in the proposed EIR for Significant Natural Resource Areas Management Plan. The alternative I favor is the Maintenance Alternative because the proposed tree removal carries danger of erosion and loss of habitat, especially for birds and insects. Please forward my comments to the commissioners voting on the alternatives presented in the draft EIR.

Thank you,

Ms. Erin Caughman
1938 33rd Ave.
San Francisco, CA 94116
erin.caughman@att.net

Cech-1

From: Bill Wycko
To: Jessica Range
Subject: Fw: EIR closures for dog areas
Date: 10/05/2011 09:07 AM

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/05/2011 09:08 AM -----

Nancy Cech
<necech@gmail.com>

To bill.wycko@sfgov.org
cc

10/04/2011 07:52 PM Subject EIR closures for dog areas

Dear Mr Wycko

01

I'm writing to voice my concerns over closing and reducing public access areas where I can exercise with my dogs. We need more areas not less, that's why there's pressure on the few areas we can go.

We live in a very populated city and need every inch of space. That's why communities take over spaces from Cal-trans like the corner of Pennsylvania and 18th to create areas to walk our dogs and commune with each other in a small taste of nature.

The parks are where I meet my neighbors, where we create community bonds. I've spent time at them with my son, but no where near as much time there as I do with my dogs. Dogs are not the enemy. Restricting them isn't going to solve anything.

I've seen dog people change the fabric of areas for the better, not for the worse. There were years that I was scared to walk the beautiful trails in McLaren, fearful of undesirable people. Now that it's well used by people walking dogs, it's a safe and vibrant area. The same is true of parks in my neighborhood. McKinley used to be just a hang out for teenagers to get drunk and break bottles on the rocks, the community with MANY dog owners organized and created a vibrant area that is well trafficked.

What I have noticed are more dogs everywhere. Downtown, 3rd St. Areas that used to be less residential. Now that every inch of SF has turned residential we need more dog areas - not less.

Nancy Cech

Cerf-1



Bill Wycko/CTYPLN/SFGOV

10/31/2011 01:19 PM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: NAP

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 01:19 PM -----



Diane Cerf

<djecerf@gmail.com>

10/31/2011 12:03 PM

To bill.wycko@sfgov.org

cc

Subject NAP

Oct. 31, 2011

Bill Wycko, Environmental Review Officer
SF Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103
bill.wycko@sfgov.org

To Mr Wycko:

- 01 [I'm writing to respond to the Natural Areas Program Environmental Impact Review. I strongly oppose the expansion of the Natural Areas Program and support the maintenance alternative described in the EIR.
- 02 [I am a dog owner, like so many other San Francisco residents. The Natural Areas Program already plans to eliminate dog play areas in San Francisco city parks, and if it is expanded, it could eliminate large swaths of off-leash dog walking areas at McLaren Park and Bernal Hill. I walk my dogs in these parks and appreciate the fact that they are large enough that I can get some exercise while also exercising my dogs. If these large off-leash areas are made smaller or eliminated, it will negatively impact me and thousands of other dog enthusiasts in San Francisco.
- Meanwhile, there is currently no way for San Francisco residents to propose new dog play areas in city parks. Thus the NAP could take away our current areas and leave us with no way to propose new dog play areas.
- San Francisco is a city with limited open space. I rely on the open spaces we do have to get out into the outdoors and get some exercise. We cannot afford to give up recreational space in San Francisco to make way for more native plants. Less recreational space will negatively impact the quality of life in our city.
- 03 [I urge you to implement the maintenance alternative and not to implement the maximum restoration alternative or any other alternative that will take away recreational space in San Francisco city parks.
- Sincerely,
Diane Cerf

Chambers-1



Bill Wycko/CTYPLN/SFGOV

10/31/2011 11:47 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: comments on the NAP EIR

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 11:48 AM -----



"thompson chambers"

<tpc124@gmail.com>

10/31/2011 10:14 AM

To <bill.wycko@sfgov.org>

cc

Subject comments on the NAP EIR

THOMPSON CHAMBERS, MPH
Environmental Planner
124 Genebern Way
San Francisco, CA 94112
415-810-9876
tpc124@gmail.com

October 31, 2011

Bill Wycko, Environmental Review Officer
San Francisco Planning Dept.
1650 Mission St., Suite 400
San Francisco, CA 94103

Dear Mr. Wycko:

I am an environmental planner with over 30 years experience in environmental planning and consulting in the Bay Area. I am a San Francisco resident, home-owner, dog-owner, small business owner and regular voter. Further, with my dog and family members, I am a regular user of city parks, playgrounds and several city DPAs. I am also very active with local park issues as an executive officer with our neighborhood association (the St. Mary's Park Improvement Club) and with our local RPD rec center (my son and I are members of the new RPD Community Recreation Council).

01

The NAP EIR provides no evidence to prove claims that dogs have an impact on plants or wildlife in natural areas. EIRs must be based on solid, documented impacts, and there is no evidence cited to justify closing or reducing the size of any DPA. The NAP EIR repeatedly says: Dogs MAY impact plants or wildlife, yet offers no evidence these impacts are actually occurring or have ever occurred. Unsubstantiated claims cannot be made in an EIR. The NAP EIR goes on to say: If allowed to be in a natural area, dogs MAY continue to impact plants or wildlife. If there's no proof of an impact, then that impact cannot "continue." Analysis in the EIR based on this speculation is incorrect and inadequate.

02

The EIR does not differentiate between impacts caused by people with dogs

Chambers-1

- 02 (Cont.) { and impacts caused by people without dogs. For example, a 200-pound man will have a much more significant impact on plants that he walks on than a 20-pound dog will have on any that it walks on. If there is little difference in the impacts, then the EIR cannot justify banning off-leash dogs from natural areas. Further, the NAP EIR considers only the closures of 15% of total off-leash space when determining impacts on remaining DPAs and recreation. Because the NAP plan puts 80% of off-leash space at risk of closure in the future, the NAP EIR must also consider the impacts of this much larger closure on remaining DPAs and on recreation.
- 03 {
- 04 { The NAP EIR assumes that because there will still be relatively large off-leash areas in McLaren Park and on Bernal Hill, that few people will be forced to drive to other DPAs to walk their dogs, with few resulting impacts on air pollution, traffic congestion, and global warming from the added car trips after the 15% closures take place. However, the EIR does not adequately consider the topography of the remaining off-leash spaces in these parks. If much of the remaining area is steep, people will not be able to use the area, and more people will be forced to drive to other DPAs. This must be analyzed in the NAP EIR. The NAP EIR does not consider the impact of people driving to other parks if 80% of off-leash space is closed. This analysis must be done.
- 05 { I would, however, endorse the Maintenance Alternative in the EIR. Under this alternative, Rec and Park would continue current management plans at the natural areas, but would not convert any more non-native habitat to native habitat. The current distribution of native and non-native plants would be preserved. Fewer trees would need to be cut down, and there would be no closures of or reductions in any off-leash areas. No trails would be closed, but no new trails would be created. The NAP EIR identifies this alternative as the Environmentally Superior alternative, because it has fewer unmitigated impacts on the environment than the other alternatives considered in the EIR. Implementing the Maintenance Alternative would result in less damage to the existing environment in natural areas, yet would preserve existing native species, and is the only alternative that is sustainable over the long term.

Thank you for taking my comments in review of the NAP EIR.

Sincerely,

Thompson Chambers, MPH



Chase-1



Bill Wycko/CTYPLN/SFGOV

10/31/2011 09:28 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: Please keep a lot of off leash areas for dogs in SF Parks

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:28 AM -----



Greg Chase

<greg@gregchase.com>

Sent by: gchase@gmail.com

10/28/2011 10:08 PM

To bill.wycko@sfgov.org

cc

Subject Please keep a lot of off leash areas for dogs in SF Parks

Dear Bill,

I'm not a resident of SF, but a frequent visitor. I don't quite understand why SF is looking to drastically restrict off leash access for dogs in the park lands. SF has some wonderful extremely open lands that have been preserved. To consider these "natural" areas is a bit over stating the reality. They are open space, but have long since been transformed from wilderness as a result of the urbanization around the area. You could consider this to be a shame, but actually its part of the history of the city. I don't believe anyone in New York City is hoping to return natural habitat back to central park.

I think some restriction to offleash dog access is reasonable. For example, if you have an athletic field, its annoying to have offleash dogs to start chasing balls when a soccer team is playing - and of course, nobody wants to step in dog poop in a picnic area.

If SF Parks wants to make ON leash access to dogs a general policy, then please set aside generous, fenced, off lease areas. People who use dog park areas tend to be frequent users of the park, and even become a sub community. If you foster this sense of community among the users of off lease dog areas, you'll find the community will police and pick up after itself. This is my observation as a participant in a few informal dog play areas.

Best regards,

Greg Chase & Eva and Oban

San Jose, CA

01

Chasnoff-1



Bill Wycko/CTYPLN/SFGOV

10/31/2011 09:14 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: Do Not Eliminate Off Leash park space in San Francisco

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:14 AM -----



Debra Chasnoff

<debrachasnoff@gmail.com>

10/31/2011 12:31 AM

To bill.wycko@sfgov.org

cc

Subject Do Not Eliminate Off Leash park space in San Francisco

01

I am writing to express my utter dismay that the city would consider eliminating our ability to bring dogs to several of the city's parks. I walk my dog many times a week at Bernal Hill. It is full of people walking their dogs, and one of the only nearby areas where dogs can run off leash. With all the problems facing our city, I think it is insane to make it harder for dogs, which there are more of than children in San Francisco, to have an opportunity to run and exercise, not to mention the enormous physical and mental health benefits to their owners of that exercise as well. Part of why I felt okay about raising a dog in the city is that I thought I could count on there being off leash facilities near my home where both I and my dog could get exercise. Your potential actions threaten that and I see no good justification for prioritizing some return of some plants over the use of the parks by residents and their pets.

Debra Chasnoff

863 Elizabeth Street, San Francisco, 94114

Child-1



Jeanie Poling/CTYPLN/SFGOV
10/31/2011 09:46 AM

To Jessica Range/CTYPLN/SFGOV@sfgov.org
cc
bcc
Subject Fw: Sharp Park

----- Forwarded by Jeanie Poling/CTYPLN/SFGOV on 10/31/2011 09:48 AM -----



katrina child
<katchild@hotmail.com>
10/31/2011 08:43 AM

To <jeanie.poling@sfgov.org>
cc
Subject Sharp Park

01 [Hi Jeanie,
I'm writing to urge you to separate out Sharp park from the Natural Areas plan. Thank you for taking our comments into consideration.
Yours,
Katrina Child
1073 Treat

Chirico-1



Bill Wycko/CTYPLN/SFGOV

10/31/2011 09:15 AM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject: Fw: Oppose the NAP takeover

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:16 AM -----



john chirico

<jlitnin@sbcglobal.net>

10/30/2011 10:31 PM

To: "bill.wycko@sfgov.org" <bill.wycko@sfgov.org>

cc

Subject: Oppose the NAP takeover

Hello,

01

I am writing to oppose the planned takeover of more city park space by the natural area program. As a San Francisco resident, tax payer, small business owner, and dog owner, I strongly feel that the public park is best served by having public access to people, including the dog owners.

I have volunteered many hours working with the Rec and Park personnel for conservation. The NAP already has that the needed manpower can maintain.

I consider myself to be a conservationist and nature lover.

What the NAP is planning could be very detrimental to the general public, park users, and dog owners in San Francisco. With 150,000 dogs in the city, we need to protect what few resources and land use that we have. I oppose the NAP as a precious space, not for the goal of conservation, but to reintroduce extinct plant species, at the expense of trees, park users, and dog owners.

Please use common sense and good judgement. The NAP aims to control and destroy all that currently exists (insects, etc.) and replace everything with plants that can not survive without constant maintenance and man power.

02

I support the Maintenance Alternative as being the "environmentally superior" option (Rec and Park's own word).

Please protect precious public park space for the people of San Francisco, instead of some overbearing and very expensive experiment by the NAP.

Thanks.

John Chirico

Sent from Yahoo! Mail on Android

Cook-1

**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 04:14 PM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: NAP activity

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 04:15 PM -----

**Elizabeth Cook**

<blissfullycrazye@gmail.com>

To bill.wycko@sfgov.org

cc

10/31/2011 02:51 PM

Subject NAP activity

Dear Mr. Wycko,

01

I support the MINIMUM of NAP activity in our parks and open space. NAP jurisdiction should not be expanded to invasive areas of activity.

02

The Natural Areas Program defines "natural areas" as areas planted only with plants that grew here when San Francisco was all sand and sand dunes. Before our city was built. Before our lush parks were created.

This narrow definition of what is "natural" is absurd. A natural area should be defined by the amount of wildlife it supports. By this definition, our parks are natural areas.

Why on earth would we want to return our parks to sand with tiny sand dune plants and coastal scrub when our parks have such incredible natural beauty and support such an incredible diversity of wildlife?

03

San Francisco is a bird watcher's paradise. The hawks and owls that nest in monterey cypress and pine trees cannot nest in any of the four (tediously slow growing) San Francisco "native" trees.

04

Pines and Cypress are the backbone trees of our parks. They're not only beautiful, but provide habitat for countless species of wildlife. Removing these trees because they're "not native" would be criminal.

05

Removing the plants that generations of gardeners have planted and tended to return these areas to sand, planted only with "native" coastal dune plants would decrease wildlife biodiversity. NOT increase wildlife biodiversity.

06

We should not remove any existing vegetation (never mind 1100 acres, 1/3 of our parklands) to return these acres back into sand, with only coastal scrub plants.

I love the lush vegetation in our parks and do not want ANY of it removed for any reason - but particularly for the ridiculous reason that a radical group (funded with my tax dollars) defines "natural" as only what was here before the city of San Francisco was built, and before our beautiful parks were created.

07

As SF's population continues to grow and more large housing developments are planned, demand for recreation and relaxing in our parks increases.

The Natural Areas Program fences off the areas that they first denude then plant with insignificant / tiny dune plants to create their plant museums.

Spending tax dollars to take away recreation areas from residents is outrageous.

Cook-1

07
(Cont.) [I want more Rec and Park gardeners hired and less staff positions paid to the Natural Areas Program, who are intent on removing the lush vegetation that I enjoy in our parks.

Thank You

Sincerely,

Elizabeth Cook

323.683.0083

--

Sometimes your only available mode of transportation is a leap of faith.

Corvan-1

From: [Bill Wycko](#)
To: [Jessica Range](#)
Subject: Fw: PLEASE DON'T RESTRICT OFF LEASH DOG WALKING AREAS
Date: 10/04/2011 09:31 AM

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/04/2011 09:31 AM -----

marianna corvan
<mariannacorvan@yahoo.com>

To "bill.wycko@sfgov.org"
 <bill.wycko@sfgov.org>

10/03/2011 07:00 PM

cc

Please respond to
 marianna corvan <mariannacorvan@yahoo.com>

Subject PLEASE DON'T RESTRICT OFF LEASH DOG
 WALKING AREAS

Dear Mr. Wycko:

I am a long time resident of San Francisco. I am writing to express my deep concern about the proposed cuts to off-leash dog walking areas in the City. If of-leash areas are restricted it will mean more dogs, squeezed in to less space. This could lead to increased aggression and will negatively impact the environment.

One of the things I love most about San Francisco is how dog friendly it is. Dogs are an integral part of many families in the City. They help ensure that families get out and exercise, and provide much valued company for many elderly residents. **Dogs give us so much, please don't take away their space.**

Thank you for your attention to this email.

Sincerely,
 Marianna Corvan
 Bernal Heights

Coxon-1

Bock, John

From: Jessica.Range@sfgov.org
Sent: Tuesday, November 01, 2011 3:47 PM
To: Bock, John
Subject: Fw: Maintenance Alternative

Jessica Range, LEED AP
San Francisco Planning Department
Environmental Planning
1650 Mission Street, Suite 400
San Francisco, CA 94103
Phone: (415) 575-9018 / Fax: (415) 558-6409 www.sfplanning.org

----- Forwarded by Jessica Range/CTYPLN/SFGOV on 11/01/2011 03:48 PM -----

Bill
Wycko/CTYPLN/SFGO
V
To
Jessica Range/CTYPLN/SFGOV@SFGOV
11/01/2011 03:22
PM
cc
Subject
Fw: Maintenance Alternative

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 11/01/2011 03:23 PM -----

Michele Coxon
<michele@stillpoi
ntonthecoast.com>
To
bill.wycko@sfgov.org
10/31/2011 08:49
PM
cc
Subject
Maintenance Alternative

Coxon-1

01

I am writing to lend my support to Maintenance Alternative for our city parks and GGNRA open lands for use by all citizens and also those with canine companions. I live in Pacifica which is surrounded by open land mostly GGNRA land and the restoration processes by the Park Conservancy, et al. These urban areas need to be kept available for recreational use by the people who live in the neighborhoods and in these towns and cities. The wildlife also inhabiting these areas have coexisted with the human inhabitants for decades and would continue to successfully coexist if not for human intervention. I have never understood the intent to make these areas like Fort Funsten and Mori Point exclusively native plant restoration areas to the exclusion of all other recreational activity enjoyed by the citizens of San Francisco and San Mateo counties and beyond. It would seem that having healthy, available and safe recreation for people and their dogs should have precedence over plants that are thriving in many other locations around the area that are not used by people and dogs. Why can't we have a few places to go where dogs can run and be dogs? It makes for a much healthier community for both the dogs and their handlers.

The GGNRA General Plan also eliminates public usage of vital open space areas enjoyed by people of the community for many decades. All of a sudden, everything is being "managed" and taken away for no apparently valid reason. We have lots of National Parks. Are people going to wander around this area left to natural occurrences more than they use it now? I know they won't. What is there to do out there? No golf course, no lagoon for throwing sticks, no trails to hike with our dogs, no enjoying this unique and beautiful coastline because everything will now be off limits. It would be enough to make me move away because all I love about this area would change. It feels like tyranny by the minority. There is hardly a soul in this community who feels strongly that the GGNRA should change these lands to an urban park instead of recreational open space for urban dwellers.

Michele Coxon
Pacifica