

## ATTACHMENTS

# Significant Natural Resource Areas Management Plan (Volume V)

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

STATE CLEARINGHOUSE NO. 2009042102



SAN FRANCISCO  
**PLANNING**  
DEPARTMENT

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





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SAN FRANCISCO  
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ENVIRONMENTAL PLANNING DIVISION | SAN FRANCISCO PLANNING DEPARTMENT



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## **Attachment B     Draft EIR Comment Letters**

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Creely-1



**Bill Wycko/CTYPLN/SFGOV**  
10/31/2011 11:50 AM

To: Jessica Range/CTYPLN/SFGOV@SFGOV  
cc:  
bcc:  
Subject: Fw: public comments on The Natural Areas plan

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 11:50 AM -----



**elizabeth creely**  
<elizabethcreely@yahoo.com>

To: "bill.wycko@sfgov.org" <bill.wycko@sfgov.org>  
cc:  
Subject: public comments on The Natural Areas plan

10/31/2011 09:59 AM  
Please respond to  
elizabeth creely  
<elizabethcreely@yahoo.com>

01

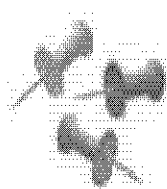
Dear Bill,

As a twenty year resident of San Francisco I wanted to voice my support for the Natural Areas Plan. They conform to my sense of what is needed and possible in San Francisco. I support the moment to restore the Sharp Park golf course.

Thank you

Elizabeth Creely

Crouch-1



**Bill Wycko/CTYPLN/SFGOV**

10/24/2011 01:28 PM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject: Fw: EIR for

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/24/2011 01:28 PM —



**Dyer Crouch**

<dyercrouch@yahoo.com>

10/24/2011 01:27 PM

Please respond to

Dyer Crouch

<dyercrouch@yahoo.com>

To: "bill.wycko@sfgov.org" <bill.wycko@sfgov.org>

cc

Subject: EIR for

Mr. Wycko -

01

Thank you so much for working towards a reasonable and balanced EIR on SF parkland.

I am a pet owner & am being bombed by emails from pet owners and groups (mostly SF Dog) who are trying to stir dog owners up without helping people understand what is being done & why.

You guys have a tough job, thanks for sticking with it. Unfortunately most of the input I am sure you are getting is the result of groups like SF Dog getting people stirred up.

Take Care -

D. Crouch

A pet owner who has grown up with dogs in the family & knowing that people calling themselves "responsible pet owners" are frequently not.

D'Antonio-1

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



RE: Natural Areas Program:

Dear Bill:

01

I have lived in San Francisco for all of my 61 years and have always been a responsible dog owner. I live right next to McLaren park where I can let my "well behaved" dogs run free for a little bit each day. I am very respectful of those that are afraid of dogs and put their leashes on. The neighborhood I live in (Ina Ct.) has a person with two huge pit bulls and they are stuck on a 6 x 6 deck at all times. In all the years I have lived here I have only seen them out for a walk once and that's pretty pitiful to do to dogs. Having said that, she is the same person that calls the cops on my dogs if I try to play ball with them in the cul-de-sac, therefore their only play time is in the park. Time & money would be better spent on something "important" and not leashing up our dogs. I live in the last house and the lot next to me is completely vacant. This city has gotten to be so dreadful with all the rules and regulations. Please don't make me leash my dogs for the 15 minutes they get to be free.

Sincerely,

A handwritten signature in dark ink, appearing to read "Georgia".

Georgia D'Antonio

A handwritten signature in dark ink, appearing to read "Corinne Barreca".

Corinne Barreca

98 Ina Ct.

San Francisco, CA 94112

(415) 845-3942

Delacroix-1

**Bock, John**

---

**From:** Jessica.Range@sfgov.org  
**Sent:** Tuesday, November 01, 2011 3:47 PM  
**To:** Bock, John  
**Subject:** Fw: it's not too late to stop this lunacy

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](http://www.sfplanning.org)

----- Forwarded by Jessica Range/CTYPLN/SFGOV on 11/01/2011 03:48 PM -----

Bill  
Wycko/CTYPLN/SFGO  
V  
11/01/2011 03:21 PM  
Subject  
Fw: it's not too late to stop this lunacy

To  
Jessica Range/CTYPLN/SFGOV@SFGOV  
cc

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 11/01/2011 03:22 PM -----

Pierre Delacroix  
<subgumdumy@yaho  
o.com>  
10/31/2011 10:27 PM  
Subject  
Please respond to Pierre Delacroix  
<subgumdumy@yaho  
o.com>

To  
"bill.wycko@sfgov.org"  
<bill.wycko@sfgov.org>  
cc  
it's not too late to stop this lunacy

Delacroix-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 park lands) 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,  
Pierre Delacroix

Demetrious-1

**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 01:19 PM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject: Fw: NAP EIR thank you!

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 01:20 PM -----

**Amad Demetrious**

&lt;amed13@gmail.com&gt;

10/31/2011 01:11 PM

To: bill.wycko@sfgov.org

cc

Subject: NAP EIR thank you!

Mr. Bill Wycko,

Thank you for reviewing my comments on the NAP EIR.

01 I support the maximum recreation alternative because I believe that natural areas are important public spaces in our urban fabric. They promote, relaxation, rejuvenation, and recreation and offer a unique connection with the natural world.

02 I can speak for myself and say that I would not do well or thrive in such a densely urban setting without access to our precious natural spaces. Our natural areas mean the world to me. In modern architecture, the importance of bringing the natural into the urban is becoming recognized as increasingly important as the scale of urbanization grows worldwide.

03 I can understand, then, the urgency in maintaining a level of integrity to these areas in the urban milieu. The effects of human activity and traffic is doubtless a prominent issue. In that regard, what concerns me is the closure of dog play areas. I am not convinced this is the best option. One reason why is that so many DPA's are in or adjacent to natural areas, and I'm afraid it would set a precedent which would be overly restrictive to the dog/human population.

04 I feel that better information/ signage/education about what areas should not be disturbed and what areas dogs should not be allowed to congregate or play extensively on would mitigate the effect of dogs on the land. To that end, I believe erosion and similar effects are more pronounced with human activity, and I feel that channeling the traffic with more regularly maintained trails is a good way to change the causes of negative effects on the land. There grows from that a greater, more frequent presence and adjustments are more easily made at a smaller scale to foster the positive outcomes in natural areas health and maintenance before bad outcomes have caused critical damage.

Dog owners and walkers have a keen appreciation for the land, and the government is uniquely poised to communicate with this population and engage in a mutually beneficial relationship with them to help watch the park, and foster awareness and knowledge on how to treat the land. People who shepherd a dog or groups of dogs do keep the parks safer. I have seen this repeatedly seen that at McLaren Park, where I go every day and have been for years. People are less likely to act out or throw litter when other users are there to witness. Users with dogs are also regular users and have the added investment of being familiar and bonded to the land.

I favor this approach to the more heavy-handed isolation of people and dogs from natural areas.



Demetrious-1

I would like to offer my email as a way to contact some of the dog community and get the word out between the government working to maintain the natural integrity of the park and the dog users of the park because I know a lot of people who want to be involved. When community is talking, I think when people hear about an area that needs to recover from erosion, for example, they are likely to alter their behavior to support rehabilitation if there is proper signage AND evidence of community investment in the area, such as community plantings, cleanups, maintenance. I can help bring users with dogs to participate in plantings and volunteer to help with maintenance when you have such events. These are people who are also regular users and would support, and in essence by their presence be enforcement of signage.

I hope I have been able to convey my vision somewhat clearly and that you share at least a bit of my belief in it. McLaren Park with my dogs means the world to me and I would much rather spend my energy rallying to support your efforts in maintenance while bolstering the community than fighting with the government about access.

I encourage people to invest their concern and work and time in the land and contribute to heightening respect of the resources. I know for a fact there is ample interest among the heaviest users of McLaren Park and Bernal Heights.

03 (Cont) [ Please consider closure of DPAS carefully and consider alternative options with signage and community involvement in maintenance and rehabilitation. I believe with insufficient government resources to provide ideal land maintenance and management, these ideas make solid sense. Again, anything I can do to help, just ask. [amed13@gmail.com](mailto:amed13@gmail.com) I am hoping to attend the Nov 12 planting at McLaren Park and starting the dialogue with other users about pitching in as a way to respect our stake in the matter of the land.

Warm regards,

Amad Demetrious

502 Southhill Blvd. 94014

A myriad bubbles were floating on the surface of a stream. "What are you?" I cried to them as they drifted by. "I am a bubble, of course," nearly a myriad bubbles answered; and there was surprise and indignation in their voices as they passed. But, here and there, a lonely bubble answered, "We are this stream," and there was neither surprise nor indignation in their voices, but just a quiet certitude.

-Ask the awakened by Wei Wu Wei

Devine-1



**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 09:23 AM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc:

bcc:

Subject: Fw: NAO EIR

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:23 AM -----



**al indelicato**

<alanddeirdre@hotmail.com>

10/30/2011 08:09 AM

To: <bill.wycko@sfgov.org>

cc:

Subject: NAO EIR

Dear Mr. Wycko,

I am a resident of San Francisco & have used many parks in SF & in the GGNRA for over 35 years now. I am a regular daily user of Mountain Lake Park, Golden Gate Park and the Presidio. My family has made weekly trips to Hawk Hill long before the GGRO came into effect & love Rodeo Beach and Lagoon & the many trails in the Marin Headlands.

Your recommended closures and limits on off leash dog areas is unfair & unwarranted in this economic struggle. These areas are large enough to have both natural areas for dogs to run in and places where natural habitats and endangered species can keep a foothold. Try putting some attention to the needs of the elderly, children & homeless. There are so many more important issues that really impact the quality of life of our citizens.

As a founder of Greenpeace SF, a lifelong member of Sierra Club, Audubon Society, Nature Conservancy, CA Native Plant Society and many others, I have a good understanding & appreciation for the needed balance between use, & destruction of ecosystems. Please do not take away these places in our Bay Area where families and furry friends can run free, feel the sunshine on their faces, get exercise & feel proud that our government officials can understand and support what it means to go take a walk in the park.

Thank you for reflecting your human side in this decision,

Deirdre Carlin Devine

01

DeWitt-1

**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 09:19 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: SF City Parks dog walking plan

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:19 AM -----

**Natalie DeWitt**  
<natalie.dewitt49@gmail.com>

10/30/2011 07:26 PM

To bill.wycko@sfgov.org

cc

Subject SF City Parks dog walking plan

Dear Mr. Wycko,

02 { I am writing about the plans to eliminate dog play areas that are adjacent to NAP areas. I strongly support the Maintenance Alternative, which maintains recreation in city parks at the same time as supporting the Natural Areas Program. I have two large dogs who need exercise (ie running off leash on a regular basis) and I need the exercise I get when taking them for walks in recreational dog play areas. I have been walking my one dog in Bernal Hill for years, and he and I both love it. We are respectful of the plants and stay on the trails where they exist, and I feel like dogs are an important part of the area, so many people from San Francisco go there and seem really happy, enjoying the view, and letting their dogs get the exercise of running, which they cannot do on leashes.

01 {

I have a choice of many places to live in the country, as a PhD scientist with many career opportunities. My work is to create new industries and markets for California scientists, to make California economically stronger through establishing scientific initiatives, and to create infrastructure to find therapies for a variety of disease. I am working towards making California the focus in the world for regenerative medicine. I have chosen to live here, because I have always loved San Francisco because of the recreational opportunities. That is why I have chosen to make this my home. If these recreational opportunities for me and my dogs, who are like family to me, are taken away, it will rob me of the very reason I live in San Francisco. Other people like me, successful people who can live anywhere in the country, will feel the same. What is the point in living in a place where recreation is not provided to SF citizens and the dogs they love. I believe recreation is essential for urban dwellers and their pets to live healthy, happy lives. Native plants are important, and I am myself a native plant lover, however I do not see restricting dog access as the solution to the problem of establishing native plants in San Francisco. Creative solutions can be found (ie the Maintenance Alternative) that will allow those of us who support the Parks and Recreation through our taxes to continue to enjoy the land we live in.

01 {

(Cont.) {

Please do not take away this most important part of my life.

Thank you for your consideration,

Natalie DeWitt

Donovan-1

To: Bill Wycko  
 Environmental Review officer  
 SF Planning Dept  
 1650 Mission St, Ste 400  
 SF CA 94103

From: Catherine Donovan  
 397 Valley St  
 SF - CA 94131

Date: # 10/24/2011

RECEIVED

OCT 27 2011

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

Please excuse  
 my writing -  
 my printer is  
 broken.

Dear Sir

01

I am writing to express my opposition to the proposed SF Recreation + Park Department Natural Areas Program.

As a daily user of SF parks, their existence + health is terribly important to me. They improve the environmental health of San Francisco itself, but also the physical health of all who use them for exercise.

Responsible dog ownership is critical and should be enforced. In my experience SF dog owners are very responsible, and in addition will self-police other dog owners on the rare occasions they see someone not picking up after their dogs, or failing to curb them.

02

The EIR is lacking in many respects. It states that dogs "may" be impacting plants and wildlife yet provides no evidence to support this claim, and it fails to mention scientific studies provided to the planning dept that show little impact on plants + wildlife by dogs. The EIR mentions "observations" that ~~impact~~ indicate the

Donovan-1

02  
(Cont.)

impact of dogs, but nowhere has any data to backup these 'observations'. Lacking such scientific evidence it is an incomplete EIR.

03

If the proposed changes are implemented, the large existing population of dog owners will be forced into a greatly reduced number of parks, dramatically increasing the impact in those areas by sheer over-use of people + dogs. Keeping a larger number of open spaces accessible lessens the impact everywhere.

I use the following parks daily because they are within walking distance of my house:


- Billy Goat Hill
- Glen Canyon
- Bernal Heights
- Douglas St dog Park
- Upper Noe Rec Centre.

Being able to use these spaces also means I don't drive, waste fuel, clog the roads, & get exercise myself.

In addition I use McLaren Park, Alamo, Ocean Beach, Marin Headlands, Sweeney Ridge & Montara Mts on weekends.

04

I implore you to keep these spaces available for all San Franciscans & their dogs.

Yours sincerely  


Dotz-1



Bill Wycko/CTYPLN/SFGOV

10/31/2011 01:20 PM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: NAP EIR comment - don't close Bernal Hill Park to off leash dogs

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 01:20 PM -----



Larry Dotz <ldotz@sbcglobal.net>

10/31/2011 12:52 PM

To bill.wycko@sfgov.org

cc

Subject NAP EIR comment - don't close Bernal Hill Park to off leash dogs

Dear Sir:

I writing to register my profound objection to the closure of any part of Bernal Hill to off-leash dog recreation. I have been a homeowner living 2 blocks from Bernal Hill park since 1994 and have been a dog owner for all but 2 of those years. For all of those years I have been using the hill to exercise my dog and myself.

I am also a passionate environmentalist. I am constantly delighted to see the variety of native wildlife found on the hill and have seen no evidence that it is impacted by the presence of off leash dogs. I regularly witness the presence of ground mammals such as squirrels, raccoons and possum (its a beautiful walk at night). There is a thriving raptor community that hunts on the hill. We even had a coyote living on the hill one year. None of these species would be presnt if of leash dogs were a problem.

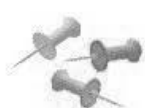
I appreciate the need to protect our native wild lands, but the continued closure of parkland to off leash dog exercise does not address the genuine human damage caused by pesticide use, urban crowding, off road biking, etc. Dogs have become a scapegoat. And should these closures go into effect who is going to enforce them? The city and county of San Francisco does not have the resources to manage the regulations already on the books. Why burden the government with additional, meaningless regulatory responsibility.

Respectfully,

Lawrence Dotz  
Alabama St, Bernal Heights  
San Fransisco



Dougherty-1



**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 04:17 PM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 04:17 PM —



**Mary Dougherty**

<mary.dougherty@yahoo.com>

>

10/31/2011 01:32 PM

To bill.wycko@sfgov.org

cc stephensfw@mindspring.com

Subject

- 01 { I live and vote in SF, am dog owner, and enjoy the public parks with my dog, neighbors and friends. I am a member of SFDOG. I fully support UC Professor Arthur Shapiro's analysis of the NAP EIR.
  - 02 { In addition, the NAP EIR offers no concrete evidence that dogs negatively impact plants or wildlife. Use of the term "may" in the report reveals the weakness and inadequacy of the report.
  - 03 { The NAP EIR's analysis of the impact on dog play areas is inadequate. The NAP EIR's definition of dogs as a "nuisance" discloses its bias against dogs and ignores the scientifically proven benefits that dogs bring to society and nature as an integral part of the environment. Dogs serve humans and nature in numerous, beneficial ways.
  - 04 { The NAP EIR fails to recognize the further restrictions on public access to areas planted with "native" and endangered species of plants.
  - 05 { Finally, the NAP EIR would have a negative impact on San Francisco's economy with the loss of jobs (e.g., professional dog walkers), more dogs being surrendered to the city shelter for lack of adequate venues for off-leash exercise, and loss of international status as a dog friendly tourist destination.
- I fully support the Maintenance or Maximum Recreational Alternative and urge you to do the same.
- Thank you.
- Sincerely,  
Mary Dougherty

Drechsler-1

**Bock, John**

---

**From:** Jessica.Range@sfgov.org  
**Sent:** Tuesday, November 01, 2011 3:50 PM  
**To:** Bock, John  
**Subject:** Fw: Comment on SF NAMP

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](http://www.sfplanning.org)

----- Forwarded by Jessica Range/CTYPLN/SFGOV on 11/01/2011 03:51 PM -----

Bill  
Wycko/CTYPLN/SFGO  
V To  
Jessica Range/CTYPLN/SFGOV@SFGOV  
11/01/2011 03:28 cc  
PM  
Subject  
Fw: Comment on SF NAMP

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 11/01/2011 03:29 PM -----

Richard Drechsler  
<r\_drechsler@yahoo.com> To  
Bill.Wycko@sfgov.org  
10/31/2011 04:55 cc  
PM  
Subject  
Comment on SF NAMP

Drechsler-1

Dear Mr. Wycko,

I am a resident of San Francisco, birder, nature tour guide, member of Audubon's conservation committee and regular visitor to the areas that are the subject of this environmental impact report.

01

I urge San Francisco's Planning Department to choose the "Maintenance Alternative" when developing plans to manage San Francisco's Parks and open spaces.

I advise this for several practical reasons:

The EIS "Summary of Environmental Effects" (Pg. 3, Table 1) shows the "proposed project" and the "Maximum Restoration Alternative" have significant impacts on 42% (6 or 14) of the environmental categories being considered.

I interpret to mean that both city residents and wildlife will be most affected by the conversion that the Planning department appears to be endorsing.

The main problem here is that nearly no one in the city, especially people who enjoy these parks, are aware that a major landscape conversion is being planned. This is the best kept secret in San Francisco.

Nearly no one will not know about this until they see their favorite tree toppled; notice more wind and noise coming from over the hill; are blasted by sunlight in their living room; or are denied access to their favorite trail or open space.

I visit all of the cities restoration projects each week. I find them to be unsuccessful. Your intention to open new ground to sunlight will also promote the growth of plant species that your management plan deems undesirable.

The Parks department will be forever weeding these areas at

Drechsler-1

great cost in  
manpower and supplies. Authorities such as the GGNRA use  
short-lived  
teams of volunteers to do this work for them. These  
volunteers realize that  
they are fighting a losing battle.

Restoration areas such as Land's End, El Polin Spring, Crissy  
Field are  
seldom spoken about anymore by birders or others looking for  
populations  
of wildlife. Since the vast majority of the cities resident  
bird species feed,  
roost and breed in trees, they leave, starve or are predated  
when their  
habitat is destroyed.

I'll leave it up to others to defend the remaining species  
who will lose their  
home, food, and security.

02

The plan to "Maximize Restoration" is dangerous and  
irreparable. At very  
least you should make sure that our residents know about this  
radical plan  
and are prepared to deal with its consequences.

Sincerely yours,

Richard Drechsler  
740 Rhode Island St.  
San Francisco, CA 94107

(415)641-7076

Elkins-1

**From:** [Bill Wycko](#)  
**To:** [Jessica Range](#)  
**Subject:** Fw: please table the Significant Natural Resource Areas Management EIR (Glen Canyon)  
**Date:** 10/11/2011 05:05 PM

---

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/11/2011 05:05 PM -----

**Tod Elkins**  
**<tod.elkins@gmail.com>** To: [bill.wycko@sfgov.org](mailto:bill.wycko@sfgov.org)  
 cc  
 10/10/2011 08:22 AM Subject: please table the Significant Natural Resource Areas Management EIR (Glen Canyon)

To: Mr. Bill Wycko  
 San Francisco Planning Department

Re: Draft EIR, Significant Natural Resource Areas Management (Glen Canyon)

Dear Mr. Wycko:

I am a 24-year San Francisco resident, who now lives in a cul-de-sac directly off Glen Canyon. We walk the canyon every day with and without our dog, and have taken part over the years in cleanups in the canyon, along the creek and in Christopher Park. We also walk other sites like Land's End, Stern Grove, Fort Funston, Crissy Field and many others in the city, which have been improved in some ways over the years we've lived in the city. Our kids attended Silver Tree when they were little and played on the ballfields of Glen Park, attended birthday parties in the play area, played hoop in the community center. We enjoy the local fauna and flora in our canyon and elsewhere in the city, and appreciate the current state of Glen Canyon, with trails, a good variance of trees and scrub, red tail hawks, skunks and various critters, coyotes, the whole experience.

01

I'm writing to protest the planned "restoration ecology" plan and "native plant" efforts to be undertaken in Glen Canyon and elsewhere in the city. The canyon is a much-used resource, by walkers, hikers, runners, climbers, summer campers, parents with strollers, pet owners, students, a whole spectrum and cross-section of the population. Anecdotally, people have told me that they come from cross-town to walk in the area.

What is the thinking about pulling out all the well-established trees, scrub and other plants, in the name of re-establishing some old-fashioned starting point for local flora? Have you looked at old photos of the area? There's grass and some scrub on the hills. Today, there's grass, scrub and trees - plus community gardens. Who's determining the concept of "original" and "pristine"? What is the zero point? Is there

Elkins-1

01  
(Cont.)

science behind it, or politics? What is driving this bus?

I urge you: reconsider this policy. As a city that's always challenged fiscally - especially in Park and Rec - we don't have the extra money to undertake an effort that's not focused, on questionable scientific ground and, most importantly unpopular AND disruptive. If the funds are there and begging to be used, please find a place that can use real improvement that will directly affect people's actual use of the site.

Again, anecdotally, many folks in the Glen Canyon area, and from around other neighborhoods in the city, have expressed similar opinions to me. I hope that they are contacting you, as well.

Thank you for your consideration.

Sincerely,

Tod Elkins  
25 Craggs Court (3 doors from Glen Canyon)  
San Francisco, CA 94131



Elliott-1



**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 04:09 PM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: Please remove Sharp Park from the Significant Natural Areas Resource Areas Management Plan

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 04:09 PM -----



**Lisa Ruth Elliott**

<lisaruth\_e@yahoo.com>

10/31/2011 03:57 PM

Please respond to

Lisa Ruth Elliott

<lisaruth\_e@yahoo.com>

To "bill.wycko@sfgov.org" <bill.wycko@sfgov.org>

cc

Subject Please remove Sharp Park from the Significant Natural Areas Resource Areas Management Plan

01

I am concerned that the Significant Natural Areas Resource Areas Management Plan is being adversely affected by the special situation surrounding the Sharp Park Golf Course. I would like to urge you to please remove consideration of Sharp Park from the Plan and allow this smart, and ecologically sound Plan to go forward to preserve 31 other of the City's recreation and park areas. They are in dire need of improvement and not being bogged down by the lawsuits around Sharp park will allow these areas to get the attention they need.

Thank you for your time.

.....lisaruth

=====

Ten Years That Shook the City: San Francisco 1968-1978 (an anthology I co-edited and co-produced) has FINALLY been released from City Lights Foundation Books [June 2011]! Get an Audio Walking Tour map for your own walk through history at local cafes and bookstores, and come hear the authors read from their work at events through September 2011. Ask me or visit shapingsf.org for info.

=====

Emanuel-1

October 24, 2011

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

RECEIVED

OCT 26 2011

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


Dear Mr. Wycko:

01 I am a 23-year resident of San Francisco and avid user of city parks, which I think are managed relatively  
02 well. I support the Maintenance Alternative for the Natural Areas Program because it is environmentally  
03 superior. However, any program implemented should not reduce or eliminate current recreation access  
04 in any way. Specifically, I object to the proposed reduction of dog play areas at McLaren Park, Bernal  
Hill and Lake Merced, especially in consideration of the proposal by the Golden Gate National  
Recreation Area proposal to ban people with dogs at most of the recreation areas it manages in San  
Francisco. The SFNAP EIR does not adequately consider or measure the impacts the GGNRA's Dog  
Management Plan will have on San Francisco city parks. Moreover, the SFNAP EIR does not provide  
scientific evidence that dogs have an impact on plants and wildlife in natural areas. Therefore, it is my  
belief there is no justification for excluding people with off-leash dogs from natural areas.

05 It is troubling that there appears to be no representation of people with dogs in an advisory capacity for  
the NAP. There are many dog groups that are qualified and representative of diverse communities and  
geographies within the city that would serve well, similar to the other partner groups that participate in  
this city program.

Parks in San Francisco are too important to residents and visitors alike. And it is wrong to pursue any  
plan that reduces access to areas that accommodate people as well as dogs by practice, especially at  
established dog play areas. Thank you for considering these comments about the SFNAP EIR and  
planning.

Sincerely,



David Emanuel  
43 Fairmount Street  
San Francisco, CA 94131

cc: Christina Olague, Commission President  
San Francisco Planning Commission

Emanuel-2



**Bill Wycko/CTYPLN/SFGOV**

10/27/2011 11:30 AM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject: Fw: comments to SFNAP EIR

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/27/2011 11:30 AM —



**Dave Emanuel**

<demanuel415@gmail.com>

10/25/2011 08:55 PM

To: bill.wycko@sfgov.org

cc: c\_oague@yahoo.com

Subject: comments to SFNAP EIR

October 25, 2011

Mr. Bill Wycko

Environmental Review Officer

San Francisco Planning Dept.

1650 Mission St., Suite 400

San Francisco, CA 94103

Dear Mr. Wycko:

01 I am a 23-year resident of San Francisco and avid user of city parks, which I think are managed  
02 relatively well. I support the Maintenance Alternative for the Natural Areas Program because it  
03 is environmentally superior. However, any program implemented should not reduce or eliminate  
04 current recreation access in any way. Specifically, I object to the proposed reduction of dog  
play areas at McLaren Park, Bernal Hill and Lake Merced, especially in consideration of the  
proposal by the Golden Gate National Recreation Area to ban people with dogs at most of the  
recreation areas it manages in San Francisco. The SFNAP EIR does not adequately consider or  
measure the impacts the GGNRA's Dog Management Plan will have on San Francisco city  
parks. Moreover, the SFNAP EIR does not provide scientific evidence that dogs have an impact  
on plants and wildlife in natural areas. Therefore, it is my belief there is no justification for  
excluding people with off-leash dogs from natural areas.

Emanuel-2

05

It is troubling that there appears to be no representation of people with dogs in an advisory capacity for the NAP. There are many dog groups that are qualified and representative of diverse communities and geographies within the city that would serve well, similar to the other partner groups that participate in this city program.

Parks in San Francisco are too important to residents and visitors alike. And it is wrong to pursue any plan that reduces access to areas that accommodate people as well as dogs by practice, especially at established dog play areas. Thank you for considering these comments about the SFNAP EIR and planning.

Sincerely,

David Emanuel

43 Fairmount Street

San Francisco, CA 94131

cc: Christina Olague, Commission President

San Francisco Planning Commission

Enzi-1



**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 09:23 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: I support "maintenance alternative"

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:24 AM -----



**Christopher Enzi**  
<x2fmrz@hotmail.com>

10/29/2011 07:14 PM

To <bill.wycko@sfgov.org>

cc

Subject I support "maintenance alternative"

Hello Bill Wycko-

01

As a citizen who has chosen to live IN A CITY, I have no wish to have my access to public parks taken away from me.

The Natural Areas Program is a deluded, nonfunded attempt to privatize public parks which are funded through public money.

02

Please know that many of us do not see any value in these type of programs. Unless we are all going away and taking our cars and two centuries of urban planning with us, it seems more sensible for the parks to be maintained for the use and enjoyment of ALL of the people who pay for their upkeep and maintenance. This includes children, runners, classes, sportspeople, dogs and their people, sunbathers, gardeners and bicyclists.

NAP is an attempt to undermine this great and successful social experiment by useless prohibitions on the citizens' enjoyment of what they have paid for. The benefits of this program are ill considered. Please do not continue down this garden path.

Thank you  
Christopher ENZI  
San Francisco Home owner  
San Francisco small business owner  
San Francisco dog owner  
San Francisco tax payer in MANY ways  
San Francisco Voter

Fasman-1



**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 09:24 AM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject: Fw: Natural Areas Program Environmental Impact Review

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:25 AM -----



**Michael Fasman**

<michaelfasman@yahoo.com>

>

10/29/2011 06:08 PM

To: bill.wycko@sfgov.org

cc

Subject: Natural Areas Program Environmental Impact Review

Bill Wycko, Environmental Review Officer  
SF Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103  
[bill.wycko@sfgov.org](mailto: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,  
Michael Fasman  
4489 24th St  
SF 94114

Fitzer-1

**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 04:17 PM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: OFF LEASH

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 04:18 PM —

**Susie Friedman**

&lt;justsusie@sbcglobal.net&gt;

10/31/2011 01:37 PM

To Bill.wycko@sfgov.org

cc

Subject OFF LEASH

Please support the Save the Off-Leash walking Areas in the GGNRA.

Since our daughter graduated Lowell High School, we do not have a place to go to meet people and socialize. We have met many friends from our daily off leash dog walks at Ft. Funston. For us, it is our form of exercise, away to relieve the day's stress, our daily dose of fresh air. Our walks are as important to us as they are for our dogs. For me, it is a way to exercise and enjoy our beautiful city and the ocean air. I always take our out-of-town guests for a walk and show off our beautiful city and the Fort. Our guests are always amazed at how lucky we are to have this spot to go to walk and run our dog Wanda.

01

Please tell the GGNRA to stop pushing its extreme proposal that will negatively impact so many of us who live in the Bay Area with our wonderful pet dogs. Our dog is a rescue. We don't know her breed, but we do know that her daily run is very important for her and for us.

Why is the GGNRA insisting on this extreme proposal that would eliminate a main form of recreation that takes place at these recreation areas? Doesn't the GGNRA have an obligation to respect the legislation that created these areas by managing them as urban recreation areas, not as pristine wilderness areas?

I understand that Congress could resolve this conflict by codifying the GGNRA's original 1979 Pet Policy as a Section Seven Special Regulation, and mandating that all properties added to the GGNRA after 1979 maintain historical recreational access.

02

This GGNRA proposal will create dangerous situations of overcrowding and overburden city parks

There are very few spaces left for people to take their dogs. 1 in 3 Bay area residents has dogs, and thousands like myself and my husband go to GGNRA every single day.

03

I understand that the GGNRA has a recreation first mandate with long practiced mixed-use activities (surfing, hiking, dog walking, horseback riding, hang-gliding, kite surfing, jogging, biking, festivals and events)

People, dogs, wildlife and plants successfully co-exist in GGNRA - dogs have

Fitzer-1

03 {  
(Cont.) { little negative impact on natural resources and bird life.

04 {  
For 10 years now, GGNRA has acted unilaterally and spent millions of dollars on a misguided plan that will require millions of dollars through the hiring of park rangers and police. I, for one, think this money would be more wisely spent on our schools.

01 {  
(Cont.) { The GGNRA dog management proposal has nothing to do with safety or the environment- it's part of a pattern of GGNRA bureaucracy that denies more and more and people/activities access to parks.

05 {  
Parts of Ft. Funston have already been shut off since we first started walking there in 1998. These closures have had a negative impact on the natural resources in the existing areas where we can walk. I not only think that Ft. Funston should remain an off-leash area, I also think the ares that were closed off should be opened up.

06 {  
More and more I have been reading articles in various national newspapers about the important role animals, and dogs, in particular, play in the lives of people. This is certainly true for our dog and I suspect for all dog owners.

05 {  
(Cont.) { Lastly, I would like to say that many dog-less people come to Funston just to be with and play with dogs. just yesterday, while walking our dog at Funston, I met a dog-less Dad who took his 2 small kids Ft. Funston so that his kids could see and pet the dogs there. They couldn't have a dog where they lived and his kids were thrilled to be able to be able to run with and pet the dogs. It also gave the Dad a chance to teach his kids how to behave with dogs, to ask, "May I pet your dog ?" and "May I feed your dog this treat ?" etc.,

01 {  
(Cont.) { There so many more important issues that could use the time and money that is being spent on trying to close off-leash dog areas. Before our city and country goes to the dogs . . . . leave well-enough alone and start focusing elsewhere.

Thanks for your attention to this matter.

Susan, Gene and Wanda Fitzer  
San Francisco  
94127



DSC\_0001.jpeg  
WANDA



Flasher-1



**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 04:37 PM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject: Fw: natural areas plan

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 04:38 PM -----



**bob flasher**

<rangerdude333@hotmail.com>

10/31/2011 04:25 PM

To: <bill.wycko@sfgov.org>

cc

Subject: natural areas plan

Mr. Wycko,

01

The proposed master plan for SF's natural areas is a great start at managing these ecologically, recreationally and socially valuable open spaces. Please do everything in your power to ensure the survival and health of these parks. The GGNRA has found that when the community is involved in maintaining and restoring the park, the diversity of park users and frequency of visits increases. Parks are what transform a neighborhood into a community. The Natural Areas provide special opportunities for families to experience nature right in the city. This is especially important for families without the means to travel to national and state parks.

02

If the issues around Sharp Park are holding up approval of the plan, please separate the golf course from the rest so we can continue to maintain the other natural areas in a condition that promotes visitation. Thanks for this opportunity to provide feedback.

Bob Flasher  
Lecturer @ SFSU  
Recreation, Parks & Tourism

Fong-1



**Bill Wycko/CTYPLN/SFGOV**

10/20/2011 04:23 PM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: Draft EIR - Comments

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/20/2011 04:24 PM -----



**Edward Fong**

**<emfong@gmail.com>**

10/17/2011 01:41 PM

To bill.wycko@sfgov.org

cc

Subject Draft EIR - Comments

Dear Sir,

I would like to comment on the Draft EIR for the Significant Natural Resource Areas Management Plan, CASE NO. 2005.1912E, STATE CLEARINGHOUSE NO. 2009042102.

01

While the conservation and preservation of native habitats, plants and species is very important, in my opinion the "Maximum Restoration Alternative" places too many restrictions on the current and future recreational needs of San Franciscans. I urge you to adopt a plan that more evenly balances preservation and recreation, either the "No Project Alternative," the "Maximum Recreation Alternative," or the "Maintenance Alternative."

Thank you for your time.

Sincerely,

Edward Fong

Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

I would like to note the following problems with the NAP EIR:

- 01 { 1) 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.
- 02 { 2) 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).
- 03 { 3) 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.
- 04 { 4) 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 { 5) I support the Maintenance or Maximum Recreation Alternative, which the EIR identifies as being environmentally superior alternatives.

Signature: ReedPrint Name: Reed RemstedtAddress: 4316- 25th St  
SF, CA 94114

Please consider the following extra points:

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## Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

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- 05 { 5) I support the Maintenance or Maximum Recreation Alternative, which the EIR identifies as being environmentally superior alternatives.

Signature: Maxwell, T  
 Print Name: Maxwell Tuozzok  
 Address: 660 Las Palmas  
94127  
(age 10)

Please consider the following extra points:

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Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

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- 05 { 5) I support the Maintenance or Maximum Recreation Alternative, which the EIR identifies as being environmentally superior alternatives.

Signature: LPrint Name: Shirley WongAddress: 33 Kark Road  
Alameda, CA 94502

Please consider the following extra points:

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Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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- 05 { 5) I support the Maintenance or Maximum Recreation Alternative, which the EIR identifies as being environmentally superior alternatives.

Signature:



Print Name:

CARL FRIEDMAN

Address:

7256 23 ST  
SF. CA 94114

Please consider the following extra points:

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Form Letter-1


October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

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- 05 { 5) I support the Maintenance or Maximum Recreation Alternative, which the EIR identifies as being environmentally superior alternatives.

Signature: Print Name: Jeff AdachiAddress: 555 7th St  
2nd Fl  
SF, CA 94103

Please consider the following extra points:

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Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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- 05 { 5) I support the Maintenance or Maximum Recreation Alternative, which the EIR identifies as being environmentally superior alternatives.

Signature: Print Name: Edwin O'ConnorAddress: 600 MARISTA ST  
SAN FRANCISCO CA 94122

Please consider the following extra points:

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Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

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- 05 { 5) I support the Maintenance or Maximum Recreation Alternative, which the EIR identifies as being environmentally superior alternatives.

Signature: Print Name: Andrea BrennanAddress: 1967 9th Ave  
San Francisco CA  
94116

Please consider the following extra points:

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Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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- 05 { 5) I support the Maintenance or Maximum Recreation Alternative, which the EIR identifies as being environmentally superior alternatives.

Signature: Print Name: RELLY BRENNANAddress: 1967 TH AVENUE  
SE CA 94116

Please consider the following extra points:

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Form Letter-1

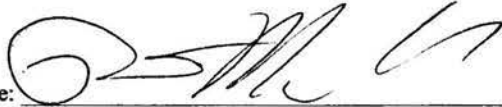
October 30, 2011

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Signature: Print Name: Patricia MankillerAddress: 2464 Belvedere  
San Leandro, Ca 94577

Please consider the following extra points:

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October 30, 2011

Bill Wycko, Environmental Review Officer  
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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

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Signature: Print Name: Kay HoskinsAddress: 2130 Market #2  
94114

Please consider the following extra points:

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Signature: Diane SeidenbergPrint Name: Diane SeidenbergAddress: 43 Los Padres Cir  
Novato, CA 94947

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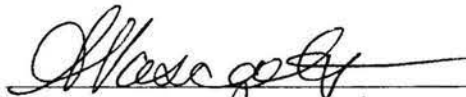
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Signature: Print Name: ANGELA PASCUALAddress: 1680 MISSION ST.  
SAN FRANCISCO CA  
94105

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Signature: Print Name: Rogelio AlfaroAddress: 3954 Reston Ct.  
S. SF CA 94080

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

3954 RESON CT  
SO SAN FRANCISCO, CA 94080

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Signature: Print Name: GINA POONAddress: 3954 Reston Court  
SOUTH SF CA 94080

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Signature:                     Print Name: TRICIA GAPLOCKAddress: 212 STATES  
SF CA  
94114

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Signature: Print Name: Yoko ShirakamiAddress: 21 Corwin St  
San Francisco CA 94114

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Signature: Print Name: Melana OrtonAddress: 601 Alameda #102  
San Francisco, CA  
94110

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Signature: *Susan Kulowitz*Print Name: Susan KulowitzAddress: 558 TexasS.F., CA 94107

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

*Angela Padilla*  
*Angela Padilla*  
 3841 18th St  
 SF CA 94114

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- 05 { 5) I support the Maintenance or Maximum Recreation Alternative, which the EIR identifies as being environmentally superior alternatives.

Signature: Print Name: Emmanuel ZamoraAddress: 971 S. Van Ness Ave  
SF, CA 94110

Please consider the following extra points:

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Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

I would like to note the following problems with the NAP EIR:

- 01 { 1) 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.
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- 05 { 5) I support the Maintenance or Maximum Recreation Alternative, which the EIR identifies as being environmentally superior alternatives.

Signature: Print Name: ALFONSO GOMEZAddress: 442 VERNON ST  
SAN FRANCISCO CA 94132

Please consider the following extra points:

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Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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- 05 { 5) I support the Maintenance or Maximum Recreation Alternative, which the EIR identifies as being environmentally superior alternatives.

Signature: Print Name: Harlan KawamotoAddress: 166-10th Ave #2  
SF CA 94118

Please consider the following extra points:

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Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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Signature: Print Name: BRIAN THEBERGEAddress: 180 20th Ave. S.F. 94121

Please consider the following extra points:

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October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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Signature: Matt KulisPrint Name: Matt KulisAddress: 430 Roosevelt Way  
SF CA 94114

Please consider the following extra points:

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October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

*Jeff Lampert*  
*Jeff Lampert*  
*430 Ross Street*  
*SF 94114*

Please consider the following extra points:

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

*M Zamora*  
*Meghan Zamora*  
 971 S. VAN NESS  
 SF, CA 94110

Please consider the following extra points:

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Signature: 

Print Name: Josh Mitts

Address: 954 Oak Street, SE, CA  
94117

Please consider the following extra points:

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

534 15<sup>th</sup> Ave  
SF, CA 94118

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

*[Handwritten Signature]*  
Robert Sanchez  
21 Ridge Ave  
M.J. CA

Please consider the following extra points:

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

*Felicia Zeiger*  
 FELICIA ZEIGER  
 San Francisco 94132

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

*David Cloutman*  
*David Cloutman*  
*245 Panorama Dr.*  
*San Francisco, CA 94131*

Please consider the following extra points:

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Signature: Print Name: ERIC LLOYDAddress: 1355 20th Av  
SF 94122

Please consider the following extra points:

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October 30, 2011

Bill Wycko, Environmental Review Officer  
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Signature: Print Name: Paul DessureauAddress: 2570 21<sup>st</sup> Ave  
SF CA 94116

Please consider the following extra points:

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October 30, 2011

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

74117

Please consider the following extra points:

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Signature: ER Anderson  
 Print Name: E. R. ANDERSON  
 Address: 3270 21st ST #303  
SF CA 94110

Please consider the following extra points:

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Form Letter-1

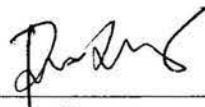
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SF Planning Dept.

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Signature: Print Name: Rina Yue SongAddress: 16 Britton St  
SF, CA 94134

Please consider the following extra points:

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Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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Signature: *Seal Grant*Print Name: Seal GrantAddress: 16 Britton St.  
San Francisco, CA 94134

Please consider the following extra points:

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October 30, 2011

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Signature: Print Name: MIKE ORDANIZAAddress: 584 CANTO ST  
SF CA 94124

Please consider the following extra points:

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October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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Signature: \_\_\_\_\_

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Print Name: \_\_\_\_\_

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Address: \_\_\_\_\_

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Signature: Print Name: SHIRLEY YUENAddress: 2307 16TH AVSF CA 94116

Please consider the following extra points:

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Signature:



Print Name:

Anna Remstedt

Address:

4316 25<sup>th</sup> St.San Francisco, California  
94114

Please consider the following extra points:

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Form Letter-1

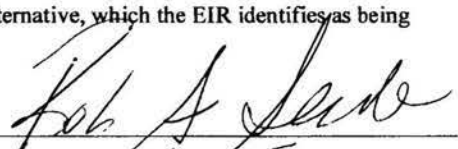
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Signature: Print Name: ROB SEVRDEAddress: 1464 GROVE ST #302  
SF, CA 94117

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Signature: Corn LundquistPrint Name: Corn LundquistAddress: 4316 25th St  
SF, CA 94114

Please consider the following extra points:

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Signature:

Print Name:

Address:

*Gloria M. Judd*  
*GLORIA M. Judd*  
*1080 Page St - 2*  
*SF*  
*94117*

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

*Sheila Pressley*  
*Sheila Pressley*  
*660 Los Palmos*  
*SF CA 94127*

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

Jenny Niec  
Jenny Niec  
2001 McAllister St.  
San Francisco, CA  
94118

Please consider the following extra points:

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Signature: 

Print Name: M. Allison Moorman

Address: 176 Belvedere St #2  
SF, CA 94117

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Signature: Print Name: Mei Mei CantyAddress: 44 McAllister St. #810 SF 94104

Please consider the following extra points:

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Signature: Print Name: Bridget IvoryAddress: 295 21ST AVE. Apt 16  
San Francisco, CA 94121

Please consider the following extra points:

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

*Colin Shiv*  
1602 Tucker St  
Oakland CA 94603

Please consider the following extra points:

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Form Letter-1

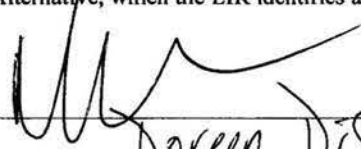
October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

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Signature: Print Name: Doreen DiSalvoAddress: 855 Pine St #5  
SE, CA 94108

Please consider the following extra points:

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Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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Signature: Andre F. Petargou  
 Print Name: Andre F. PETARGOU  
 Address: 3840 Fulton St  
SF CA 94118

Please consider the following extra points:

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Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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Signature: Kathleen Behargou  
 Print Name: Kathleen Behargou  
 Address: 3840 Fulton St  
ST Ca 94118

Please consider the following extra points:

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October 30, 2011

Bill Wycko, Environmental Review Officer  
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Signature: X Gloria A Moreira  
 Print Name: Gloria A Moreira  
 Address: 321 Paul Avenue  
San Francisco CA  
94124

Please consider the following extra points:

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Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
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Signature:

*Carolina Aparicio*

Print Name:

*Carolina Aparicio*

Address:

*321 Paul Avenue  
San Francisco CA**94124*

Please consider the following extra points:

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Signature: Melissa Rabeira y Muniz  
 Print Name: Melissa Rabeira y Muniz  
 Address: 1760 Hyde St #20  
SF 94109

Please consider the following extra points:

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Signature: \_\_\_\_\_

*Emily Carpenter*

Print Name: \_\_\_\_\_

*Emily Carpenter*

Address: \_\_\_\_\_

*123 17th St. Apt 108**Oakland, CA 94612*

Please consider the following extra points:

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Signature: Shana Harris  
 Print Name: Shana Harris  
 Address: 3942 Ruby St.  
Oakland, CA 94609

Please consider the following extra points:

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Form Letter-1

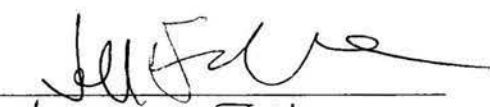
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Signature: Print Name: JEFF FITTERMANAddress: 1222 6th  
SF 94120

Please consider the following extra points:

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October 30, 2011

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

Camille Durney  
142 Del Vale Ave.  
San Francisco 94127

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Signature:

Print Name:

Address:

*John F. Hickey*  
*JOHN F. Hickey.*  
*2654 - 23<sup>rd</sup> Ave*  
*SFO. CA - 94116*  
*66424809*

Please consider the following extra points:

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

*Kevin Schmidke*  
*Kevin Schmidke*  
*702 Foerster St.*  
*San Francisco CA 94127*

Please consider the following extra points:

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

*P. Jensen*  
*Patti Jensen*  
*1238 5th Ave*  
*SF CA 94122*

Please consider the following extra points:

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

*Ted Garber*  
*Ted Garber*  
*895 Rockaway Beach Ave*  
*Pacific CA 94044*

Please consider the following extra points:

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Signature: Print Name: DANICA SUSKINAddress: 343 London St.SF, CA 94112

Please consider the following extra points:

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Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

*Stacey M. Gregg*  
 Stacey M. Gregg  
 211 Dry Creek Rd.  
 San Jose, CA 95124

Please consider the following extra points:

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October 30, 2011

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Signature: Print Name: JOHN J. FLYNNAddress: 1963 TURK  
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Please consider the following extra points:

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Signature: \_\_\_\_\_

*Alicia Lowe*

Print Name: \_\_\_\_\_

*Alicia Lowe*

Address: \_\_\_\_\_

*2246 - 32nd Ave.**S.F., CA 94116*

Please consider the following extra points:

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Form Letter-1

October 30, 2011

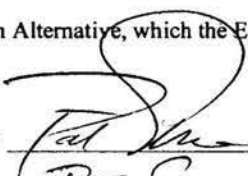
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Signature:



Print Name:

PAT Sweeney

Address:

1951 OAK ST #2

SF CA 94117

Please consider the following extra points:

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Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

6240 - 38th AVE.  
SF CA 94121

Please consider the following extra points:

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October 30, 2011

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Signature: Print Name: DANNY STERNAddress: 152 HAMMERTON AVE  
SF CA 94131

Please consider the following extra points:

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Signature:

Print Name:

Address:

*Derek Duest*  
DEREK DUEST  
575 Duboce Ave  
S.F., 94117

Please consider the following extra points:

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Signature: Print Name: Dayala LevensonAddress: 152 Hamerton Ave  
SF CA 94131

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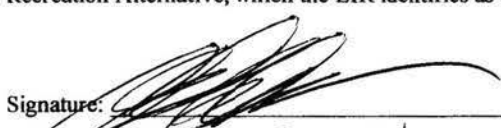
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Signature: Print Name: Brian BenzelAddress: 2170 20th Ave  
95 CA 94116

Please consider the following extra points:

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Signature: Print Name: Angela HoAddress: 1140 Chopin Terrace  
Fremont, CA 94538

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Form Letter-1

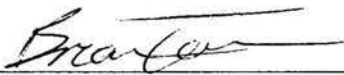
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Signature: Print Name: BRIAN TANAddress: 554 ANZA ST.  
Mountain View, CA 94041

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

*Delia Ginorio*  
*Delia Ginorio*  
*413 MOSCOW*  
*SF 94112*

Please consider the following extra points:

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Signature: Print Name: HENRY JACKSONAddress: PIER 70 #11 #303  
SF 94107

Please consider the following extra points:

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Signature: Jon Edmond Abraham  
 Print Name: Jon-Edmond Abraham  
 Address: 1080 EDDY ST., #405  
SF, CA 94109

Please consider the following extra points:

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Signature: \_\_\_\_\_



Print Name: \_\_\_\_\_

Rebecca S. Li

Address: \_\_\_\_\_

303 C NIMITZ DR

SF, CA 94130

Please consider the following extra points:

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Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

*Melissa Oliva-Sullivan*  
*Melissa Oliva-Sullivan*  
*594 33rd Ave*  
*San Francisco, CA 94121*

Please consider the following extra points:

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October 30, 2011

Bill Wycko, Environmental Review Officer  
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Signature: Helen L. Refman  
 Print Name: Helen L. Refman  
 Address: 439 Avila Street  
San Francisco, CA  
94123

Please consider the following extra points:

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October 30, 2011

Bill Wycko, Environmental Review Officer  
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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

1627 Junston Ave

SF. CA 94122

Please consider the following extra points:

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Signature: ChalmPrint Name: Christine LimAddress: 970 Duncan St., Fl07  
San Francisco, CA 94131

Please consider the following extra points:

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Signature: Warren WitterPrint Name: Warren WitterAddress: 601 Van Ness Ave. Apt. 127  
San Francisco Ca.  
94102

Please consider the following extra points:

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Signature:

Print Name:

Address:

*Alice Yavorzky*  
*Alice Yavorzky*  
*760 - 5th Ave.*  
*SF, Ca. 94118*

Please consider the following extra points:

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Signature: Sylvia Pascal  
 Print Name: SYLVIA PASCAL  
 Address: 2117 Judah Street  
SAN FRANCISCO 94122

Please consider the following extra points:

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Signature:



Print Name:

Linda Rochin

Address:

494 27th Ave  
San Fran 94121

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Signature: Lauren RossiPrint Name: Lauren RossiAddress: 1470-42nd ave  
SF, CA 94122

Please consider the following extra points:

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Bill Wycko, Environmental Review Officer  
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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

*E. R.*  
*EVAN WILDE*  
*15530 EL GATO LN*  
*LOS GATOS, CA 95032*

Please consider the following extra points:

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Signature: Susie H. KoshmalaPrint Name: SUSIE H KOSHMAALAAddress: 15530 EL GATO LN  
LOS GATOS, CA 95032

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Signature: LaPriel RossiPrint Name: LaPriel RossiAddress: 1470-42ave  
SF CA 94122

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Signature: Print Name: DAISY AZUMAAddress: 2201 OCEAN AVE  
S.F, CA 94127

Please consider the following extra points:

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

*Golda Chan*  
*into CARBON*  
*425 Shrader*  
*SF CA 94117*

Please consider the following extra points:

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## Form Letter-1

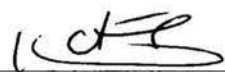
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- 05 { 5) I support the Maintenance or Maximum Recreation Alternative, which the EIR identifies as being environmentally superior alternatives.

Signature: 

Print Name: KATHERINE LING

Address: 305 WILLOWCREEK LANE  
MARTINEZ  
CA 94553

Please consider the following extra points:

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Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_



Jennifer Shao

2138 Quesada Ave

San Francisco, CA 94124

Please consider the following extra points:

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October 30, 2011

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Signature: Print Name: Rosa GomezAddress: 291 Alta Vista Way  
Daly City, CA 94014

Please consider the following extra points:

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October 30, 2011

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- 05 { 5) I support the Maintenance or Maximum Recreation Alternative, which the EIR identifies as being environmentally superior alternatives.

Signature: Print Name: Cristina LopAddress: 1455 Palou Ave  
SF, CA 94124

Please consider the following extra points:

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Form Letter-1

October 30, 2011

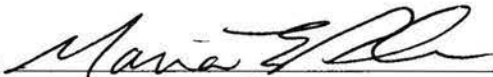
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Signature:



Print Name:

Maria Pineda

Address:

151 Crescent Ave  
San Francisco CA  
94110

Please consider the following extra points:

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October 30, 2011

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Signature: 

Print Name: JAMES B CORWIN

Address: 42 URANUS

SF, CA

Please consider the following extra points:

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Address: \_\_\_\_\_

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Signature: Print Name: NORM CUNNINGHAMAddress: 565 ELLIS ST

Please consider the following extra points:

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

*Judy K. Dons*  
JUDY K. DONS  
1322 24th Ave  
San Francisco, CA 94122

Please consider the following extra points:

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Form Letter-1

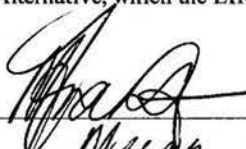
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Signature: Print Name: Megan FranzenAddress: Shannon St  
SF CA  
94114

Please consider the following extra points:

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Signature: \_\_\_\_\_

Cat Gutierrez

Print Name: \_\_\_\_\_

Address: 151 Crescent Ave.

SF, CA 94110

Please consider the following extra points:

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October 30, 2011

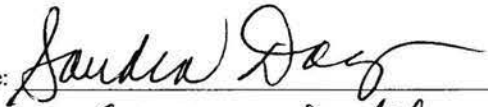
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Signature:



Print Name:

SANDRA DAY

Address:

756 Stewart

Daly City, CA 94015

Please consider the following extra points:

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Signature: Print Name: Karen HanAddress: 958 Plymouth Ave  
SF CA 94112

Please consider the following extra points:

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Signature: 

Print Name: SANDRA SHURT

Address: 3981 - 24th St #1  
SF CA 94114

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Form Letter-1

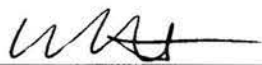
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Signature: Print Name: Vi HuynhAddress: 1567 28th Ave  
SF, CA 94122  
vhuyh@sfsu@yahoo.com

Please consider the following extra points:

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Signature: Print Name: Jeany HahnAddress: 500 P South Hill Blvd  
Palo Alto, CA 94014

Please consider the following extra points:

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Form Letter-1

October 30, 2011

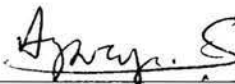
Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

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Signature: \_\_\_\_\_



Print Name: \_\_\_\_\_

ASH SUNDARAM

Address: \_\_\_\_\_

15205 PARKIDGE ROAD,  
MORGAN HILL,  
CA - 95032

Please consider the following extra points:

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Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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Signature: Print Name: Taylor HuxfordAddress: 3958 Stoneridge Dr.  
Pleasanton CA 94588

Please consider the following extra points:

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October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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Signature: Karen M. PuterbaughPrint Name: KAREN M. PUTERBAUGHAddress: 194 Lybrand Ave  
SF CA 94131

Please consider the following extra points:

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October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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Signature: June Wilson  
 Print Name: JUNE WILSON  
 Address: 267 Ulloa St  
SF CA 94127

Please consider the following extra points:

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Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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Signature:



Print Name:

WILLIAM HANNON

Address:

267 ULLOA

SAN FRANCISCO CA

Please consider the following extra points:

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October 30, 2011

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Signature:

Print Name:

Address:

*Karen Brungardt*  
*Karen Brungardt*  
*2255 47th Ave*  
*SF CA 94116*

Please consider the following extra points:

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Signature: Print Name: Pam del RioAddress: 2854 Harrison St  
San Francisco, Ca  
94110

Please consider the following extra points:

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October 30, 2011

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Signature: 

Print Name: Margaret Dobson

Address: 767 Corbett

#3

SF, CA 94131

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

*Jeffrey Gee*  
Jeffrey Gee

500 D South Hill Blvd  
Daly City CA

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

Sheila Liman  
125 Cambon dr # 3m  
SF, CA 94132

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

*Alyssa Royce*  
*Alyssa Royce*  
~~830 Castro~~  
 125 Buckingham Way #301  
 SF, CA 94132

Please consider the following extra points:

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Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

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Signature: 

Print Name: Sandra van Dyk

Address: 2 Gladys Street SP

94110

Please consider the following extra points:

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Signature: R. Oskowski  
 Print Name: R. Oskowski  
 Address: 1930 Grove St  
SF CA 94117

Please consider the following extra points:

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Signature: Print Name: J. WilliamsAddress: 35 Robinson  
SF 94112

Please consider the following extra points:

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

Please consider the following extra points:

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Form Letter-1

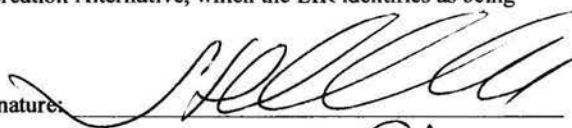
October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

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Signature: Print Name: Stella CharbatschiAddress: 1128 Pine StSan Francisco, 94109

Please consider the following extra points:

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Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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Signature: Print Name: KEVIN EDWARDSAddress: 39 BELCHER ST.  
SL CA 94114

Please consider the following extra points:

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Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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Signature: Print Name: Charles R ChavezAddress: 1 Church St. #206  
S.F. CA  
94114

Please consider the following extra points:

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Form Letter-1

October 30, 2011

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SF Planning Dept.

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Signature: Print Name: Chris AndersonAddress: 12 Visitation Ave.  
Burlingame, CA 94010

Please consider the following extra points:

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Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

*Michael Herrington*  
*Michael Herrington*  
*178 Haight St*  
*SF CA 94102*

Please consider the following extra points:

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October 30, 2011

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Signature: Carlos RodriguezPrint Name: CARLOS RODRIGUESAddress: 1025 Jackson Street, #11San Francisco, CA 94133

Please consider the following extra points:

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Form Letter-1

October 30, 2011

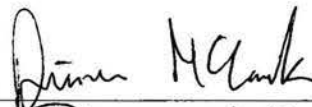
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Signature:



Print Name:

Diana McCormick

Address:

3445 Mary Evening  
Las Vegas NV 89129

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Signature: Michael J NovakPrint Name: MICHAEL J NOVAKAddress: 2201 MORAGA ST  
SF CA 94122

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

*Kirby Counts*  
*Kirby Counts*  
*75 Landers St.*  
*S.F. CA 94114*

Please consider the following extra points:

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Signature:

Print Name:

Address:

*Kathleen A. Moraga*  
*KATHLEEN A. MORAGA*  
*2201 MORAGA ST.*  
*SF CA 94122*

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Signature: Norma Nieves  
 Print Name: Norma Nieves  
 Address: 5380 Old Redwood Hwy  
Pennycuik CA  
94951

Please consider the following extra points:

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October 30, 2011

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Signature:

Print Name:

Address:

*Grace Walker*  
*Grace Walker*  
*3555A 17th St*  
*SF, CA 94110*

Please consider the following extra points:

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

Apt 9

San Francisco.

Please consider the following extra points:

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Signature: Print Name: ANA CONTRERASAddress: 133 JULES AVE  
S.F. CA 94112

Please consider the following extra points:

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- 05 { 5) I support the Maintenance or Maximum Recreation Alternative, which the EIR identifies as being environmentally superior alternatives.

Signature: *Danie Ouyang*Print Name: *Danie Ouyang*Address: *20 Wood St*  
*SF CA 94118*

Please consider the following extra points:

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Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

I would like to note the following problems with the NAP EIR:

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Signature: Print Name: SHERYL OWYANGAddress: 20 WOOD ST  
SF CA 94118

Please consider the following extra points:

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Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

630 PRESIDIO AVE  
SF 94115

Please consider the following extra points:

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October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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Signature: Print Name: Jane AlexanderAddress: 1635 7<sup>th</sup> Ave  
SF CA 94122

Please consider the following extra points:

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October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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Signature: Joan L. MapouPrint Name: JOAN L. MAPOUAddress: 2952 POIK ST.  
SF, CA 94109

Please consider the following extra points:

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Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

Kimberly Yee  
837 Skyline Dr  
Daly City, CA 94015

Please consider the following extra points:

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Form Letter-1


October 30, 2011

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- 05 { 5) I support the Maintenance or Maximum Recreation Alternative, which the EIR identifies as being environmentally superior alternatives.

Signature: 

Print Name: Chelsea Permberton

Address: 621 Cole Street

San Francisco, CA

94117

Please consider the following extra points:

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## Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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Signature: Douglas Acres  
 Print Name: Douglas Acres  
 Address: 1224 ~~228~~ Bayside Dr  
Ste E  
SF 94130

Please consider the following extra points:

- 06 { Ft. Funster for dogs & people!  
 \_\_\_\_\_  
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 \_\_\_\_\_  
 \_\_\_\_\_  
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Form Letter-1

**Quick Comments on NAP EIR**

It's always best to include personal comments about your experiences in natural areas in SF city parks. However, if time is short, here are a few quick points you can make to show the Planning Department that the NAP EIR is inadequate and that additional work must be done.

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For more information on these points, and to see additional points that you can add to your comment, go to: <http://www.sfdog.org>.

Comments are due at the end of business (5 pm) on **Monday, October 31, 2011.**

Email your comment to:  
bill.wycko@sfgov.org

Or deliver them in person to:  
Bill Wycko, Environmental Review Officer  
SF Planning Dept  
1650 Mission St, Suite 400  
San Francisco, CA 94103

07 {

Spencer Arcieri  
Age: 11 years old <sup>no capital</sup>  
Email: spencerarcieri@gmail.com  
reason: I think dogs  
should be of leash  
because they should have  
the right to they have  
feelings and thoughts  
like us.

Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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Signature: Print Name: Nikki AzumaAddress: 2201 Ocean Ave  
SF, CA 94127

Please consider the following extra points:

08 { I can't throw a ball with my dog on a leash!  
And I'm responsible enough to pick up after her!  
Much like other dog owners!

Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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Signature:

Print Name:

Address:

*Carol Baker*  
*CAROL BAKER*  
*411 1/2 30th St*  
*SF CA*  
*94131*

Please consider the following extra points:

- 09 { *Please keep our city*  
*dog friendly.*

Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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Signature: \_\_\_\_\_

*Linda K. Barnes*

Print Name: \_\_\_\_\_

*Linda K. Barnes*

Address: \_\_\_\_\_

*99 Westbrook Ave  
Daly City, CA 94015*

Please consider the following extra points:

10 {

*I walk at Pine Lake with my dog. Please  
Keep it open*

Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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Signature: Robin BuckleyPrint Name: Robin BuckleyAddress: 2546-39<sup>th</sup> Ave  
S.F. CA 94116

Please consider the following extra points:

- 11 { When you (GGNRA) were asking for my support, you were saying that you would protect my open space areas from development; that you (GGNRA) would protect my right to continue to recreate in the ways that I have since my birth. Dog walking is my only source of recreation/exercise. You (GGNRA) are adding to my mistrust of my government. Stop The Lies!



Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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Signature: Terry BurkesPrint Name: Terry BurkesAddress: San Francisco, CA

Please consider the following extra points:

- 12 { • Well exercised dogs are less stressed & better behaved in public. This is also better for public safety.



Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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Signature: Lynette Astighione  
 Print Name: Lynette CA Stighione  
 Address: 60 Coleridge St  
SF CA 94110

Please consider the following extra points:

- 13 { I am NOT for off leash not  
fair to our dogs of SF CA  
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 \_\_\_\_\_  
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 \_\_\_\_\_  
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Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
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- 05 { 5) I support the Maintenance or Maximum Recreation Alternative, which the EIR identifies as being environmentally superior alternatives.

Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

*Amy Chow*  
389 Monterey Rd  
Pacifica, CA 94044

Please consider the following extra points:

14 {

*Dogs need open space also!*

Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

1137 Fairmont Dr,  
San Bruno, CA 94066

Please consider the following extra points:

15 {

I use city park, I would like them  
to stay off-leash

Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

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Signature: Mary Jane CherkasovPrint Name: MARY JANE CHERKASOVAddress: 225 Anderson  
SF CA 94110

Please consider the following extra points:

16 {

Overall, dog owners are considering keeping their pets on the paths & streets.

Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

*Amy Clark*  
*Amy Clark*  
*1404 Van Dyke Ave.*  
*SF CA 94124*

Please consider the following extra points:

17 {

*Dogs off leash are better socialized!*

Form Letter-1

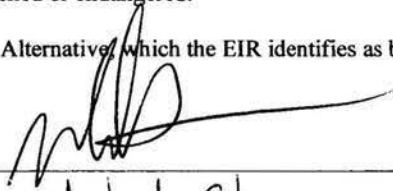
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Signature: Print Name: Michael CohenAddress: 6 Locksley Ave  
San Francisco CA 94132

Please consider the following extra points:

18 {

We need off leash areas for our dog to play!

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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Signature: Gayle DonskyPrint Name: Gayle DonskyAddress: 204 Alta Vista Rd  
Mill Valley CA  
94941

Please consider the following extra points:

19 {

I come to SF parks. The parks  
need to remain open to dogs  
and people for recreation.



Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

*[Handwritten Signature]*  
C. DeBoer  
2155 Hayes St  
SF, CA 94117

Please consider the following extra points:

20 {

*have kids dogs,  
a mortgage  
need dog walks too!*



Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

*[Handwritten Signature]*  
*Penny DeLeon*  
 150 HAYEN DR.  
 DAVIS CITY CA 94604

Please consider the following extra points:

- 21 { *I WALK IN CITY PARKS. TAKING AWAY ACCESS FOR MY DOG & I IMPACTS MY ABILITY TO HAVE THE HEALTH BENEFITS & QUALITY OF LIFE LIVING IN THIS AREA. THIS IS A HUGE SOCIAL OUTLET FOR ME.*

Form Letter-1

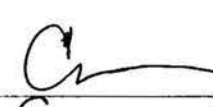
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Signature: Print Name: Corinne DowlingAddress: 48 Mirabel Ave.  
SF CA 94110

Please consider the following extra points:

- 22 { As founder/advisor of Give a Dog a Bone (www.gadab.org) and guardian of three well-behaved trained dogs, I know first hand how exercise positively impacts dog behavior; and conversely, the lack of exercise creates frustrated dogs with high probability of losing good social skills. I wholeheartedly support the Maximum Recreation Alternative. Thank-you, Corinne

Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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Signature: \_\_\_\_\_



Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

Please consider the following extra points:

23 {

McGlenn Park allguseo

Form Letter-1

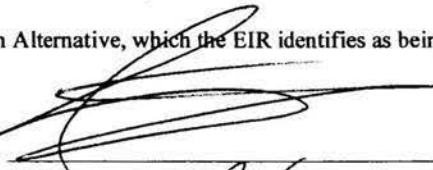
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Signature: Print Name: John R. KierAddress: 37 Sussex St.  
94131

Please consider the following extra points:

- 24 { Keep I Keep Glen Park  
Dog Friendly.
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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Signature: Print Name: JOAN NETE FUNCKEAddress: 565 4th LANE  
SSF CA 94080

Please consider the following extra points:

25 {

I WALK AT PINE LAKE WITH MY  
DOGS OFF LEASH. CHIHUAHUA MEETUP  
ALSO THERE

Form Letter-1

October 30, 2011

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SF Planning Dept.

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Signature: Joell HollowellPrint Name: Joell HollowellAddress: 212 States St.  
SF CA 94114

Please consider the following extra points:

26 {

Dogs make people happy.  
Happy people are better citizens

Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

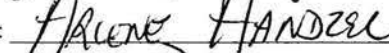
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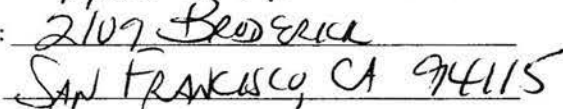
Signature:



Print Name:



Address:



Please consider the following extra points:

- 27 { I AM NOT A DOG OWNER BECAUSE OF MY LIFESTYLE RESTRICTIONS, BUT I KNOW WELL THE CONTRIBUTIONS THAT DOGS MAKE TO OWNERS - LOTS OF HEALTH & HAPPINESS BENEFITS!! WOULD A BARGAN!



Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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- 05 { 5) I support the Maintenance or Maximum Recreation Alternative, which the EIR identifies as being environmentally superior alternatives.

Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

Lee Heidhues  
566 40<sup>th</sup> Avenue  
SAN FRANCISCO CA  
94121-2523

Please consider the following extra points:

- 28 { Most Dogs ARE NOT disruptive. To curtail their activities, ie keeping them on the leash actually creates more behavioral problems with canines.
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_



Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

I would like to note the following problems with the NAP EIR:

- 01 { 1) 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.
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- 05 { 5) I support the Maintenance or Maximum Recreation Alternative, which the EIR identifies as being environmentally superior alternatives.

Signature: Mary KennedyPrint Name: Mary KennedyAddress: 599 San Bruno Ave  
SF, CA 94107

Please consider the following extra points:

- 29 { SF dog owners are caring & for the most part, ~~are~~ responsible - don't punish a few - dogs & cats are part of the fabric of our city

Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

*Yuchen Ku*  
Yuchen Ku  
554 Anza St.  
Mountain View, CA 94041

Please consider the following extra points:

30 {

As much as people with kids, people w/  
dogs should be able to enjoy the parks  
w/ their pets as well.

Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

I would like to note the following problems with the NAP EIR:

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

*Gillian Ladd*  
Gillian Ladd  
245 Panoramas Dr  
SF CA 94131

Please consider the following extra points:

31 {

These proposed closures will negatively impact my life. I might have to move away from SF, if implemented.

Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

I would like to note the following problems with the NAP EIR:

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- 05 { 5) I support the Maintenance or Maximum Recreation Alternative, which the EIR identifies as being environmentally superior alternatives.

Signature: Print Name: RICARDO LAGOSAddress: 216 Shrader St  
SAN FRANCISCO CA 94117

Please consider the following extra points:

- 32 { → Please keep Golden Gate Park oak woodlands safe for dogs and legal off leash.
- Also make use of

Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

I would like to note the following problems with the NAP EIR:

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Signature: Evelyn LeePrint Name: EVELYN LEEAddress: 170 Benuah St  
SF CA 94117

Please consider the following extra points:

33 { Please Don't Take it Away!

Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

I would like to note the following problems with the NAP EIR:

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

1780 Bancroft Ave  
SF CA 94124

Please consider the following extra points:

34 {

Our pet needed to exercise and live  
happy life

Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

I would like to note the following problems with the NAP EIR:

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- 05 { 5) I support the Maintenance or Maximum Recreation Alternative, which the EIR identifies as being environmentally superior alternatives.

Signature: Print Name: TRISTON McLaughlinAddress: 220 Quintan  
SF, CA  
94116

Please consider the following extra points:

35 {

Keep the parks for  
everyone its what  
makes them special!  
o o o



Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

I would like to note the following problems with the NAP EIR:

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Signature: Print Name: Sonja OhldagAddress: 115 Santa Clara St.  
Brisbane, CA 94005

Please consider the following extra points:

36 {

most important to me is the  
Crissy Field!



Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

I would like to note the following problems with the NAP EIR:

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Signature: George E. Papah, Jr.  
 Print Name: George E. Papah, Jr.  
 Address: 2520 Sanchez St  
SF, CA 94117

Please consider the following extra points:

37 { As a disabled person I am concerned with the  
 loss of accessible opportunities for me and my  
 dog.

Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

I would like to note the following problems with the NAP EIR:

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

*[Handwritten Signature]*  
Derek Park  
6 Lochley Ave #10J  
SF CA 94122

Please consider the following extra points:

38 {

*pls keep off leave available*

Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

I would like to note the following problems with the NAP EIR:

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Signature:

Print Name:

Address:

*Julianne Reidy*  
*Julianne Reidy*  
*586 Bright St.*  
*San Francisco, CA 94132*

Please consider the following extra points:

39 {

*We need open spaces for BOTH dogs and people to spend time. DON'T take the parks away from the animals & people.*

RE: NAP EIR

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94644

40 { KEEP OFF LEASH AVAILABLE PLEASE!!!

Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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Signature: Print Name: NANA SCOTAddress: 55 John Muir Dr #10  
SE 94132

Please consider the following extra points:

41 {

We all need our freedom - even  
those working.

Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

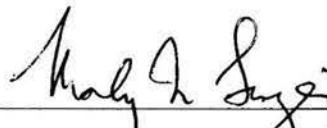
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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_



MORDEY M. SINGER

177 BELGRAVE AVE  
SF 94117

Please consider the following extra points:

42 {

EVERY DAY I SEE MANY DOGS AT  
CASSY FIELD, WALKING + ENJOYING THEIR DOGS  
AND HAVE NEVER SEEN ANY CONTACT,  
DAMAGE, ETC.



Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

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Signature: 

Print Name: Patricia Storti

Address: 4124 Washington Blvd  
Greenfield  
SF 94129

Please consider the following extra points:

- 43 { CHILDREN ARE A  
GREATER NEGATIVE  
IMPACT TO THE  
BEACH  
than strollers +  
CHILD PLAY  
than dogs.



Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

I would like to note the following problems with the NAP EIR:

- 01 { 1) 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.
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Signature:

Z Strauss + High Tops

Print Name:

Zoe Strauss

Address:

428 28<sup>th</sup> St.

SF. CA 94131

Please consider the following extra points:

44 {

Plants and dogs can co-exist. One of the reasons we chose to purchase a house in SF and create a life here is because it is a very dog friendly city. Using the spaces will change that for us!



Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

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- 05 { 5) I support the Maintenance or Maximum Recreation Alternative, which the EIR identifies as being environmentally superior alternatives.

Signature: Print Name: Teresa SwiftAddress: 1234 5th Ave  
SF CA 94122

Please consider the following extra points:

- 45 { Dogs need to run on a daily basis to stay healthy. Dog runs get muddy & too frequently filled with big dogs who could hurt small dogs.

Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

*Natalie Tondem*  
*NATALIE TONDEM*  
*3150 RIVERA ST.*  
*SA CA 94116*

Please consider the following extra points:

46 {

*Impact of humans, garbage, etc. of*  
*humans in GORP lands*

Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

I would like to note the following problems with the NAP EIR:

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

- 01 { 1) 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.
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- 05 { 5) I support the Maintenance or Maximum Recreation Alternative, which the EIR identifies as being environmentally superior alternatives.

Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

*Ryan Tuozzolo*  
*Ryan Tuozzolo*  
*660 Los Palms*  
*94127 (12 yrs old)*

Please consider the following extra points:

- 47 { *For our generation, keep dog areas open*

Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

I would like to note the following problems with the NAP EIR:

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- 05 { 5) I support the Maintenance or Maximum Recreation Alternative, which the EIR identifies as being environmentally superior alternatives.

Signature: Sunny Walters  
 Print Name: Sunny Walters  
 Address: 220 Guintara St  
94116 SF

Please consider the following extra points:

- 48 { Parks keep us healthy! More green - less greed!

Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

I would like to note the following problems with the NAP EIR:

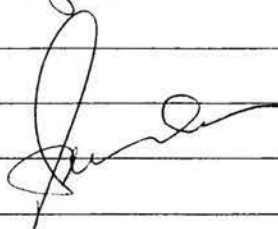
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Signature: Sandra WaszakPrint Name: SANDRA WASZAKAddress: 1446 15th Ave  
SF CA 94122

Please consider the following extra points:

49 {

Dogs are better dogs with off  
leash time.



Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

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- 05 { 5) I support the Maintenance or Maximum Recreation Alternative, which the EIR identifies as being environmentally superior alternatives.

Signature: Susan Wheeler  
 Print Name: Susan Wheeler  
 Address: 230 Moncada Way  
San Francisco, CA 94127

Please consider the following extra points:

- 50 { I am concerned that feral cats that live in  
city areas designated as NAP not be removed or  
harmed. T-N-R<sup>M</sup> (Trap-Neuter-Return-Manage)  
has been a very successful program in vastly  
lowering the number of cats in the city's parks

Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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- 05 { 5) I support the Maintenance or Maximum Recreation Alternative, which the EIR identifies as being environmentally superior alternatives.

Signature: Shirley WileyPrint Name: Shirley WileyAddress: 152 Collins  
SF CA 94118

Please consider the following extra points:

51 {

There are more dogs than leids!



Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

RE: NAP EIR

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

Christina

CHRISTINA WONG

1201 POST ST.

ALAMEDA, CA 94501

Please consider the following extra points:

- 52 { I am a responsible dog owner & pick up/clean up after my dog. I appreciate the environment as much as my dog & if it weren't for off-leash parks, we would not have a place to run & exercise freely. Please, keep parks off-leash & I will keep it clean. Thank you. - C.W.



Form Letter-1

October 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

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Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

Please consider the following extra points:

53 {

KEEP THEM OPEN!

Fox-1

**Bock, John**

---

**From:** Jessica.Range@sfgov.org  
**Sent:** Tuesday, November 01, 2011 3:49 PM  
**To:** Bock, John  
**Subject:** Fw: Natural Areas Program 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](http://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: Natural Areas Program EIR

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 11/01/2011 03:27 PM -----

Project Coyote  
<[info@projectcoyote.org](mailto:info@projectcoyote.org)>  
To  
<[bill.wycko@sfgov.org](mailto:bill.wycko@sfgov.org)>  
10/31/2011 04:59 PM  
cc  
Subject  
Re: Natural Areas Program EIR

Fox-1

Re: Natural Areas Program EIR

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.
- 03 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.
- 04 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 for considering my comments and concerns on this important issue.

Sincerely,

Camilla H. Fox

P.O. Box 5007  
 Larkspur, CA 94977  
 ph: 415.945.3232  
 chfox@earthlink.net

Freedman-1

**RECEIVED**

June 10, 2012

JUN 11 2012

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

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

Re: Natural Area Plan Draft Environmental  
Impact Report for Mount Davidson

Dear Mrs. Wycks,

I am absolutely appalled that the City is seriously considering removing 1,600 mature and healthy trees on Mount Davidson and replacing them with native shrubs which will require regular applications of hazardous pesticides. This is madness. Has the City no better use for taxpayer dollars during tough times than cutting down perfectly healthy trees to take us back to 1776? I often hike on Mount Davidson, & I am often struck by how magical the mountain is with the fog passing through the tall trees and a light drizzle falling only on parts of the mountain. It's almost like a rain forest. To destroy all this beauty of nature to go back into the past will ruin one of the unique treasures of

Freedman-1

San Francisco Please help to stop the radical environmentalists from destroying Mound Davidson.

Sincerely,

Aubrey Freedman (homeowner in Miraloma Park)  
347 Los Palms Drive  
San Francisco, CA 94127  
(415) 333-0345

Furney-1

**Bock, John**

---

**From:** Jessica.Range@sfgov.org  
**Sent:** Monday, November 07, 2011 11:10 AM  
**To:** Bock, John  
**Subject:** Fw: Glen Park Restoration

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](http://www.sfplanning.org)

----- Forwarded by Jessica Range/CTYPLN/SFGOV on 11/07/2011 11:10 AM -----

Chelsea  
Fordham/CTYPLN/SF  
GOV  
11/07/2011 10:13  
AM  
To  
Jessica Range/CTYPLN/SFGOV@SFGOV  
cc  
Subject  
Fw: Glen Park Restoration

Chelsea E. Fordham  
Environmental Planning  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA, 94103  
(415)575-9071  
[chelsea.fordham@sfgov.org](mailto:chelsea.fordham@sfgov.org)

----- Forwarded by Chelsea Fordham/CTYPLN/SFGOV on 11/07/2011 10:14 AM -----

Bill  
Wycko/CTYPLN/SFGO  
V  
11/07/2011 09:23  
AM  
To  
Chelsea Fordham/CTYPLN/SFGOV@SFGOV  
cc

Furney-1

Subject  
Fw: Glen Park Restoration

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 11/07/2011 09:23 AM -----

Gary Furney  
<gwfxyz@yahoo.com>  
To  
"bill.wycko@sfgov.org"  
11/04/2011 09:16 PM <bill.wycko@sfgov.org>  
cc

Subject  
Please respond to Glen Park Restoration  
Gary Furney  
<gwfxyz@yahoo.com>  
>

01 [ I do not support a habitat restoration in Glen Park leads to the destruction of the habitat for the coyote(s) that currently live there.

I would support a habitat restoration in Glen Park that creates a healthy habitat for the coyotes.

Gary F.  
Noe Valley

Gaar-1

Greg Gaar  
440 Hazelwood Avenue  
San Francisco, CA 94127

RECEIVED

OCT 12 2011

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

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

Planning Department Case No. 2005.1912E  
State Clearing House No. 2009042102

Dear Mr. Wycko,

I would like to preface my critique of the DEIR by pointing out that it seems to be a basic contradiction to require an Environmental Impact Report on a project that proposes restoring San Francisco's natural environment. It's unfortunate that the DEIR cannot discuss the overwhelming environmental benefits that would result in fully implementing the Natural Areas Management Plan.

The Natural Areas Program has only nine gardeners to manage 32 parks covering over 1100 acres. Without additional staffing or funding the ability of NAP to successfully achieve the goals in the Natural Areas Management Plan is doubtful. In the meantime the weeds are cumulatively spreading and displacing the native plant communities which the plan proposes to preserve.

I will specifically address two significant natural resource areas that I have worked on as a volunteer:

#### Corona Heights

The proposed action item in the Natural Areas Management Plan to remove 16 invasive Monterey Pine trees is a positive first step in the goal to restore the native grassland of Corona Heights. More trees would need to be removed (specifically adjacent to Museum Way) if the Maximum Restoration Alternative is adopted.

If the Natural Areas Management Plan or the Maximum Restoration Alternative are not adopted and implemented then the DEIR should address the specific negative environmental impacts that would occur to the biological resources of Corona Heights.

01



Gaar-1

01  
(Cont.)

The DEIR should list the plants, insects, reptiles and birds that could be lost if the native plant community is further degraded by the growth of the trees and the spread of the invasive exotic plants that the non-native trees promote.

#### **Tank Hill**

The scores of non-native trees located on the summit are the major threat to Tank Hill's biological resources. The failure of the Natural Areas Management Plan to propose the removal of these trees and the failure of the DEIR to address the long-term environmental impacts of retaining the trees need to be addressed in the final EIR.

02

The eucalyptus and acacia trees will continue to grow thereby cumulatively expanding the shade, leaf litter, fog drip and altering the chemical composition of the soil. These impacts encourage the spread of numerous highly invasive exotic plants (*Erharta erecta*, *Oxalis pes-caprae*, *Rumex acetosella* etc).

All of these negative environmental impacts will continue to reduce Tank Hill's native plant community and the wildlife that depend on that community.

Also, the trees are rapidly spreading to the perpendicular cliff above Twin Peaks Boulevard. The tree roots are breaking apart the chert rock which will continue to destabilized the cliff causing more landslides which destroys habitat and exposes the city to lawsuits. The DEIR fails to discuss these impacts.

#### **What is Recreation?**

03

The Maximum Recreation Alternative fails to discuss sustainable, nature enhancing recreation. If the priorities of the Maximum Recreation Alternative are defined as dog walking, bicycling or hiking-jogging then other forms of "green recreation" such as bird watching, botanizing, insect watching and habitat restoration are denied or reduced. With support for the Maximum Restoration Alternative more people will engage in nature loving recreation. Habitat restoration is the perfect form of recreation because volunteers sweat-off excess body weight, socialize with friends, neighbors and city gardeners and improve the biological health of our natural areas.

04

Since I have twenty years of habitat restoration experience

Gaar-1

04  
(Cont.)

in San Francisco and since I founded and operate a San Francisco Native Plant Nursery in Golden Gate Park you might say that I am biased in stating that the Maximum Restoration Alternative is the best option for repairing the damage that has been inflicted on San Francisco's native plant communities. As the biological systems that support the diversity of life continue to deteriorate, our species is beginning to realize that we need to repair the damage now, not later.


San Francisco is a microcosm of what is occurring throughout the planet. San Francisco should be at the forefront at restoring our natural heritage.

Sincerely,




Greg Gaar

Gachowski-1

 **Bill Wycko/CTYPLN/SFGOV**  
10/31/2011 09:17 AM  
To: Jessica Range/CTYPLN/SFGOV@SFGOV  
cc:  
bcc:  
Subject: Fw: Off-Leash Dog Walking

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:17 AM -----

 **strachowski@comcast.net**  
10/30/2011 10:05 PM  
To: bill.wycko@sfgov.org  
cc:  
Subject: Off-Leash Dog Walking

Greetings,

I am a San Francisco resident who walks her dogs in many off leash areas in the city. Since my day often takes me to different areas of the city I use several of the parks to walk my dogs off leash, such as Crissy Field, Pine Lake, Golden Gate Park and Bernal Hil. No only do I enjoy the exercise for myself and for my dogs, but also the beauty of the surroundings. This is why I have supported the Sierra Club.

01

To hear that the areas to walk dogs off leash are planned to be reduced leads me to wonder if the plan was really thought through to the impact it would have. I would like to know if the it was taken into consideration that people who walk their dogs off leash actually use a park more than people who do not walk a dog off leash? On any given day, no matter the weather, you will find a person walking their dog off leash, whereas a person who is walking for exercise will opt to walk at a mall or on a treadmill. So by restricting off leash dog walking you really are restricting an individuals right to exercise.

02

The impact of an off leash animal is no different than that of a wild animal (which we do have even in San Francisco). And how can you really determine that such erosion or impact is due to an off leash animal? And do you really think by restricting off leash dog walking that it will just go away? Have you thought about the impact on the little areas left for people to walk their dog off leash? We will not go away, nor will we stop walking our dogs off leash. By limiting the areas in which we do so only begs for more erosion problems due to the high usage of the limited areas available.

Sincerely,  
Michele Gachowski

Garber-1



**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 11:53 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: NAP EIR

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 11:53 AM -----



**Ted Garber**

<tdx9997@gmail.com>

10/31/2011 11:48 AM

To Bill.wycko@sfgov.org

cc

Subject NAP EIR

Ted Garber  
895 Rockaway Beach Ave.  
Pacifica, CA 94044

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

10/31/11

Sir:

01

I recently became aware of the San Francisco Recreation and Park Department Natural Areas Program Environmental Impact Report. I live in Pacifica and the proposal to cut at least 15,000 trees in Pacifica on the Sharp Park property as one alternative in the NAP EIR is an abomination. The EIR contains no scientific studies on the potential benefits of removing trees. It likewise does not adequately acknowledge the problems of removing the trees; i.e. loss of habitat for adapted wildlife in Sharp Park, loss of a carbon sink as trees remove CO2 from air, erosion, run off of soils, run off of pesticides used to kill non-native species, pollution Red Eared Frog habitat on Sharp Park Property by pesticide and soil run off, infill of Laguna Salada on Sharp Park by soil run off, etc. In some instances the negative effects are referred to as "Non-significant".

02

This proposed environmental assault by SF Recreation and Parks is the result of an unfortunate effort by people with a knee-jerk response to the idea that nonnative plants are intrinsically bad for public lands. This is not based upon objective research but rather upon prejudice. The net negative environmental impact upon public lands will

Natural communities evolve. The idea that a place needs to be "restored" to a snapshot point in time ignores the complexity of an evolving environment and only acknowledges that the megafauna of that point in time as being the important thing to be considered in public land management.

Garber-1

- 03 [ I visit Laguna Salada at Sharp Park frequently. The cattails at Laguna Salada provide important shelter for migratory birds from predators. Removal of cattails as proposed would result in the loss of shelter and nesting sites for birds.
- 04 [ I also take my dog to McClaren Park and Sutro Mountain and I would mourn the loss of public areas that I can take my dog.  
Recreation should be a priority for the SF Recreation and Park Department and not removal of public lands from recreational opportunities. The proposed loss of walking trails, off-leash and on leash dog areas in the NAP EIR, coupled with the GGNRA's proposed reduction of trails and dog-friendly trails, drastically reduces recreation areas for everyone in the Bay Area, both with and without dogs.
- 05 [ It is true for this EIR, as it was for the GGNRA DEIR that there are very few scientific studies on the effect of dogs on wildlife. Some studies, in fact, show that the presence of dogs increases the presence of wildlife.
- 01 (Cont) [ No healthy trees should be removed from public lands. Recreation areas for people and people with dogs should be increased.
- Sincerely,  
Ted Garber

Garbutt-1

**From:** [Bill Wycko](#)  
**To:** [Jessica Range](#)  
**Subject:** Fw: DPAs  
**Date:** 10/05/2011 09:08 AM

---

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/05/2011 09:08 AM -----

**Gerard Garbutt**  
**<gerard.g@sbcglobal.net>** To: bill.wycko@sfgov.org  
cc  
10/04/2011 07:43 PM Subject: DPAs

Hi Bill

01

I am writing to show my approval of the proposed reduction of DPAs in city parks. I find myself regularly pestered and often harassed by aggressive dogs. The less I see of them the better.

Gerard Garbutt  
261 Amherst Ave.  
Kensington, CA 94708  
510-527 9765  
[gerard.g@sbcglobal.net](mailto:gerard.g@sbcglobal.net)

Garnett-1

07Oct2011

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

Re: Off-leash areas like Fort Funston

To whom it may concern:

01

There are few places left in the world where one can feel at one with nature. I take my son (he is almost 2 years old) and my 2 dogs for walks at Fort Funston almost daily and it means the world to me. To watch my son watch the ocean, the other dogs, the birds, the trees, the sunset or sunrise is always a magical time. Other dog owners I run into are always pleasant and mindful people. The land seems to be kept clean and people and dog friendly at all times. I can't imagine if we didn't have the ability to walk freely through this area. The world is big and I know of nowhere else in the world where I enjoy myself more. My husband and I love it there so much, with our dogs walking by our side unhindered, freely meeting and greeting other dogs and taking in the beautiful surroundings. We even considered for a minute having our wedding there we love it so much. I am sad to hear that there are people that wish to change this and I believe that they don't understand how important and how vital off leash recreation is for the well-being of dogs and their families. My family is so much happier and alive when we can walk our dogs at places like Fort Funston and Stern Grove. Off-leash recreation has my full support. Please let me know if I can provide any additional information.

Thank you,



Elizabeth Garnett

920 Bracey Dr.

Daly City CA 94015

415-722-0070

RECEIVED

OCT 11 2011

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT

Gavin-1



Gregory Gavin  
<gg@gregorygavin.com>

10/25/2011 10:48 AM

To: jessica.range@sfgov.org

cc: Daniel Meyerowitz <Daniel@outburst.dk>, Marty Linder  
<colleenirwin@hotmail.com>, Nic Griffin  
<nicolagriffin57@hotmail.com>, Bambi Menes

bcc:

Subject: Bernal Hill EIR Plan - factual mistake

Dear Jessica Range, San Francisco Department of Planning,

I've lived near the top of Bernal Hill for 21 years.\*

I'm also a dog owner (a reasonably minded one) who enjoys the hill daily.

For this reason I've been continually annoyed by the incorrect conclusion by the "Significant Areas" people that dogs are a major factor in the erosion of Bernal Hill.

The violence committed against the hill occurred some 50 years ago when the paved road which surrounds the hill was built. All along the peripheral road, on the uphill side, the slope was changed for approx. 30 degrees to approx. 70 degrees to accommodate the roadbed as it was carved into the hill. No mitigation, such as concrete retaining walls etc. was installed to hold back the erosion that naturally wanted to reclaim the road below.

Because the road bed was carved out of the hillside made of very soft rock (called chert) the hill has been eroding rapidly above the road to restore a more stable gradual slope. This erosion is happening largely from below, next the road, and will continue until a stable slope is achieved. In geology this is called the "angle of repose". In fact, dog walking trails above road that run *parallel* to the slope, because they compact the earth, may even be slowing down the erosion process. The only way to retard the erosion in any serious way is to build a massive retaining wall along the uphill side of the road.

Bernal hill is a totally unique ***endangered social environment*** where people interact in person with friends and strangers and animals instead of the ubiquitous electronic devices, phones, headphones etc. Its a truly public space in a world where the whole notion of "public" is disappearing rapidly. The value of this to our city is incalculable.

If you are going to restrict the social and recreational environment on Bernal Hill (I actually think you will *never* stop people from enjoying dogs on the hill no matter what is implemented - the space just too loved) at least do it for honest reasons.

The erosion argument is bogus.

Thanks for your consideration.



Gavin-1

Gregory Gavin

\* I also made very popular (locally) film called "Bernaltown" that hinges on youth super heroes who save the hill from development.

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[www.riveropolis.com](http://www.riveropolis.com)

[www.gregorygavin.com](http://www.gregorygavin.com)

[gg@gregorygavin.com](mailto:gg@gregorygavin.com)

San Francisco • 415-824-4408

Gerrie-1



**Jeanie Poling/CTYPLN/SFGOV**  
10/31/2011 10:29 AM

To: Jessica Range/CTYPLN/SFGOV@SFGOV  
cc:  
bcc:  
Subject: Fw: Comments on the Significant Natural Resource Areas Management Plan

----- Forwarded by Jeanie Poling/CTYPLN/SFGOV on 10/31/2011 10:31 AM -----



**Philip Gerrie**  
<glassgerrie@gmail.com>  
10/31/2011 10:28 AM

To: jeanie.poling@sfgov.org  
cc:  
Subject: Comments on the Significant Natural Resource Areas Management Plan

Hello Jeanie,

My name is Philip Gerrie. I am a resident of SF for over 40 years.

- 01 { I urge the Planning to adopt the SNRAMP DEIR. The report was to analyze the environmental impacts of the NAP. It has done that mostly very well.
- It has laid out a compromised approach to Rec & Parks natural areas land management. It is not enough enough to achieve sustainability at all sites but is doable.
- 02 { This is a compromised plan and is not extreme or radical.
- 03 { This plan should include community stewardship of recreational use of NAP land
- If the environmental superior alternatives are recreation and maintenance, and not restoration, the analysis is flawed.
- 04 { The true impacts of the maximum restoration alternative cannot be adequately evaluated since it is only two pages long therefor no definitive conclusions about the impacts of recreation nor of biological benefits since there is no depth to the alternative.

Overall, I am in favor of the SNRAMP DEIR.

Thank you, Philip Gerrie  
4341 26th st SF CA 94131

Ghosh-1

**Bock, John**

---

**From:** Jessica.Range@sfgov.org  
**Sent:** Tuesday, November 01, 2011 3:48 PM  
**To:** Bock, John  
**Subject:** Fw: I am writing in opposition to Significant Natural Resource Areas Management Plan 2005.1912E

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](http://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: I am writing in opposition to  
Significant Natural Resource Areas  
Management Plan 2005.1912E

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

samir@ghosh.com  
10/31/2011 06:45 PM  
To  
bill.wycko@sfgov.org  
cc  
Subject  
I am writing in opposition to  
Significant Natural Resource Areas  
Management Plan 2005.1912E

Ghosh-1

Mr Wychko,

- 01 [ We have far more pressing matters than changing our vegetation back in time. The costs alone makes this plan impractical. Spend this money improving recreation and safety. We have parks with insufficient water, poor landscaping, unsafe railings, signage, handicap access, etc.

Also, before you pursue this, please read book Anticancer ([aniticancerbook.com](http://aniticancerbook.com)). Not only could it save your life, but if it stops this plan from using pesticides or herbicides, it will like save many many lives.

Destroying thousands of trees seems wasteful, whether indigenous or not.

We need more trails and recreation areas, not fewer.

- 02 [ 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 [ 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).
- 04 [ 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.
- 05 [ 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.
- 06 [ Support the Maintenance Alternative and the Maximum Recreation Alternative.  
The NAP EIR identifies them as "environmentally superior."

Samir Ghosh  
762 Clipper St  
SF, CA 94114

Gleichenhaus-1

**D. PETER GLEICHENHAUS**

**RECEIVED**

**OCT 25 2011**

1324 Portola Drive  
San Francisco CA 94127

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

October 24, 2011

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

Phil Ginsberg  
Director, Department of Recreation and Parks  
501 Stanyan  
Golden Gate Park  
San Francisco CA 94117

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

Dear Bill and Phil,

01

[I support designation of Sharp Park as a historical resource. Having lived in San Francisco since 1985 I know a little about the golfing community. Deputy Commander at the Presidio of San Francisco in the 80's and President of the Lake Merced Golf Club more recently, I am aware of some of the challenges inherent in maintaining, operating and providing a course here.

In my view, for our citizenry and their children, we need to retain access to as many recreational facilities as possible. The probability of creating more golf courses is very low, probably non existent. Therefore, the arguments about Sharp Park merit special attention.

In our city, Sharp Park Golf Course provides an asset available to everyone who plays golf. The fact that abandonment of such an amazing and historically important golf facility is being considered boggles ones mind.

Gleichenhaus-1

02

I hope that the short sightedness of some individuals concerned about the environment is not allowed to blur the view of more enlightened public officials. Reducing the footprint or significantly changing the Mackenzie designed course should be eliminated from consideration.

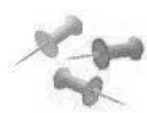
Like many other San Franciscan's and others who play golf, I implore you to support retention of Sharp Park in its current configuration. The course merits preservation as a historical resource.

Respectfully,



D. Peter Gleichenhaus  
Colonel, US Army (Retired)

Glikshtern-1

**Bill Wycko/CTYPLN/SFGOV**

05/29/2012 08:48 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: Draft Environmental Impact Report for Natural Areas  
Management Plan

History:

This message has been forwarded.

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 05/29/2012 08:48 AM —

**apglk@comcast.net**

05/26/2012 10:19 PM

To bill.wycko@sfgov.org

cc "Avalos, John" &lt;John.Avalos@sfgov.org&gt;, "Elsbernd, Sean" &lt;Sean.Elsbernd@sfgov.org&gt;, "Chiu, David" &lt;David.Chiu@sfgov.org&gt;, "Chu, Carmen" &lt;Carmen.Chu@sfgov.org&gt;, "Cohen, Malia" &lt;malia.cohen@sfgov.org&gt;, "Mar, Eric" &lt;Eric.L.Mar@sfgov.org&gt;, "Kim, Jane" &lt;jane.kim@sfgov.org&gt;, "Olague, Christina" &lt;Christina.Olague@sfgov.org&gt;, "Campos, David" &lt;David.Campos@sfgov.org&gt;, "Farrell, Mark" &lt;mark.farrell@sfgov.org&gt;, "Lee, Ed" &lt;mayoredwinlee@sfgov.org&gt;, "Wiener, Scott" &lt;scott.wiener@sfgov.org&gt;

Subject Draft Environmental Impact Report for Natural Areas  
Management Plan

Dear Mr. Wycko,

- 01 { The plan is criminal. Cutting healthy trees and using herbicides should be illegal. How can anybody possibly conclude that the plan would have no significant negative impact on wind and shadow, hydrology and water quality, and forest resources is a mystery.
- Ideally I'd like the NAP eliminated all together.
- 02 { But since it's not likely to happen: MAINTAINCE ALTERNATIVE is the only acceptable alternative - at least, hopefully, no additional (plenty has been done already) harm will be done.

Anastasia Glikshtern

Gomez-1

RECEIVED

Oswald L. Gomez  
Carol L. Borden-Gomez  
221 Juanita Way  
San Francisco, California 94127  
Phone (415) 731-5889

JUN 11 2012  
CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
M E A

ossie\_gomez@comcast.net

cbordengomez@comcast.net

June 9, 2012

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

Mr. Wycko,

We live at 221 Juanita Way, our backyard is adjacent to Mt. Davidson. We are very fortunate to be living in the City, but so close to nature. The wealth of plants, birds, and other animals in our area is wonderful, one of the reasons we chose to purchase our home here.

01

Whatever action is taken on Mt Davidson will impact the rest of our lives, as we plan to live in our home until death. We are not in favor of the plan for Mt. Davidson as outlined by the Natural Areas Program. We are unhappy with many aspects, but will focus on three core issues in this letter.

02

**1. Potential for erosion/flooding**

During winter months, it is common for water to flow like small creeks down the mountain. Everyone we've talked to on our side of the street has had problems with water coming into homes or garages. We are very concerned about the potential for damage to our homes from erosion caused by the proposed removal of so many trees near our property. Who will be responsible for this damage?

Page 459 of the DEIR notes comments to the report regarding "Geology and Soils". Erosion effects are mentioned several times - and for good reason. Some smart person suggests "The need for a forester to evaluate the erosion impacts from cutting trees down." But the thoughtful comments are deemed "to have either no impact or less than a significant impact". Perhaps less than significant to the report writer, but in fact quite significant to residents like us in close proximity to Mt. Davidson.

Page 465 of the DEIR offers "a summary of the 1995 management plan's general policies and management actions (SFRPD 1995)." Below header "Geotechnical/Soils" on page 466 is this bullet point:

"Cooperate with adjacent property owners to minimize erosion and runoff issues." This leads to our second issue.



Gomez-1

03

**2. Lack of communication by NAP**

We read the Miraloma Park monthly newsletter, the Westside Observer local paper, along with the SF Chronicle, etc. But only recently did we become aware of the NAP plan for drastic tree removal in our backyard. They have not communicated their plans to our neighborhood. As homeowners whose property is adjacent to Mt. Davidson Park, we should have received personal notification of such drastic measures. If a home or business in our area plans major changes, they are required to notify residents within specific parameters. Why doesn't NAP have to notify us of their intentions to destroy our backyard?

04

**3. Cost**

It is difficult to understand the logic of this reality: Throughout our City, young trees are being planted by our City workers in median strips, etc. as part of beautifying San Francisco. At the same time, plans are underway to remove thousands of healthy full grown trees in our parks. How does this make fiscal sense, especially during our current economic climate? City Departments are

05

**Our Request**

- Take another look at this plan, obtain viewpoints from geology/erosion experts outside of SF Park and Rec, and definitely outside of NAP. They are too invested in this plan moving forward to be open to alternatives. One might say - they can't see the forest for the trees!
- Listen to what San Franciscans want. We fight deforestation in Brazil, do we want it to happen right here at home? We don't think so. Limit tree removal to diseased and hazardous trees.
- Consider the cost of implementing this extensive tree removal plan during this time of fiscal crisis. This is not a prudent use of taxpayer funds.

06

04

(Cont.)

Thank you for your consideration of our comments. We look forward to an open and honest review of the DEIR, and hope that common sense will prevail.

Sincerely,

  
Oswald L. Gomez

  
Carol L. Borden-Gomez

Gordon-1



**Bill Wycko/CTYPLN/SFGOV**  
10/31/2011 09:18 AM

To: Jessica Range/CTYPLN/SFGOV@SFGOV  
cc:  
bcc:  
Subject: Fw: Comment: Natural Areas Program Environmental Impact Review

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:19 AM -----



**Kelly Gordon**  
<kgordon566@yahoo.com>  
10/30/2011 07:28 PM  
Please respond to  
Kelly Gordon  
<kgordon566@yahoo.com>

To: "bill.wycko@sfgov.org" <bill.wycko@sfgov.org>  
cc:  
Subject: Comment: Natural Areas Program Environmental Impact Review

Oct. 30, 2011

Bill Wycko, Environmental Review Officer  
SF Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103  
bill.wycko@sfgov.org

Dear Mr. Wycko,

- 01 [ I'm writing to oppose the expansion of the Natural Areas Program and to voice my support for the maintenance alternative described in the Environmental Impact Review.
- 02 [ I am a dogowner and dogwalker, and I use the off-leash dogwalking areas in Bernal Hill and McLaren Park on a daily basis. I recognize the importance of native plant preservation, but I don't feel that it's appropriate to prioritize these projects in urban parks at the expense of these tremendously popular off-leash dogwalking areas. I feel that the first and foremost mission of urban parks should be to promote recreational opportunities for the citizens of San Francisco, and, since so many of us enjoy exercising with our dogs, off-leash dogwalking areas should at the very least be maintained in their current state. Additionally, given that citizens of San Francisco currently have no means of proposing new off-leash areas in parks, the reduction of current dog recreation areas would increase use of remaining areas, possibly to the point of negatively impacting them.
- 01 [ Please strongly consider implementing the maintenance alternative in the Environmental Impact Review.  
(Cont) I very much appreciate your consideration of this issue.  
Sincerely,  
Kelly M. Gordon

Gottesman-1

**Bock, John**

---

**From:** Jessica.Range@sfgov.org  
**Sent:** Tuesday, November 01, 2011 3:47 PM  
**To:** Bock, John  
**Subject:** Fw: Save the dog play areas!

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](http://www.sfplanning.org)

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

Bill  
Wycko/CTYPLN/SFGO  
V  
11/01/2011 03:22 PM  
To  
Jessica Range/CTYPLN/SFGOV@SFGOV  
cc  
Subject  
Fw: Save the dog play areas!

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 11/01/2011 03:23 PM -----

judithrachelleg@g  
mail.com  
10/31/2011 08:37 PM  
To  
[bill.wycko@sfgov.org](mailto:bill.wycko@sfgov.org)  
cc  
Subject  
Please respond to  
judithrachelleg@g  
mail.com  
Save the dog play areas!

Gottesman-1

- 01 [ I support the Maintenance Alternative to allow dogs to play freely in parks while being environmentally sound.

Thanks!

Judith Gottesman, MSW

Sent on the Sprint® Now Network from my BlackBerry®

Gravanis-1

74 Mizpah Street  
San Francisco, CA 94131

October 31, 2011

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

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

Dear Mr. Wycko:

For the most part, I find that the DEIR does an adequate assessment of the environmental impacts of the San Francisco portion of the proposed project. There are a number of items that I would like to see addressed before the Final EIR is released.

01

Environmentally Superior Alternative (p. 524) – The arguments presented for the selection of the Recreation and Maintenance Alternatives as superior to the proposed project and the Maximum Restoration Alternative are not convincing. A reduction in recreational access is not a negative environmental impact, and even if it were the claims of reduced recreational access are exaggerated. Enforcement of the leash law is not a loss of access. Restricting the use of bicycles is not a loss of access. (In fact, some trails will get greater use if walkers don't fear encountering bikes.) Reducing the number of trails in favor of better design and maintenance can **improve** public access for a greater diversity of park users (as well as reducing maintenance costs and damage from erosion). Also, the Maximum Restoration Alternative could result in greater opportunities for recreational activities such as wildlife observation and hands-on stewardship. Please re-visit the designation of the environmentally superior alternative, especially in the light of a more fully fleshed-out Maximum Restoration Alternative.

02

Laguna Salada -- Please consider carefully the pros and cons of including the Sharp Park natural area in San Mateo County in the same environmental analysis as the natural areas within San Francisco County. Because Sharp Park is so complex and controversial, and the potential environmental impacts of whatever occurs there are so different from those of the in-city areas, it would make more sense to conduct two separate analyses. I realize that some people claim that doing two separate environmental assessments could constitute piecemealing, but I fail to see how there would be significant cumulative impacts that would require the two proposals to be analyzed together. If the analyses cannot be separated, I hope that a thorough explanation of the reasoning will be provided that carefully considers the intent of CEQA.

Gravanis-1

- 03 Glossary – I'm glad that the DEIR includes a glossary, but I hope it will be improved to make the contents of the document more accessible to the reader. Some examples:
- Urban forest**—A significant stand of nonindigenous trees.
- Is that what is really meant by the term? If so, where it says, "GR- 15b—Maintain a stocking rate that will perpetuate the urban forest and promote forest health," does it mean that we're not allowed to plant native trees in the "urban forests" (because they'd no longer be urban forests)? And what do the terms "forest" and "forested" mean? They are used several times, but not defined in the glossary. The entire document would be so much more professional and credible if the terms "urban forest" and "forest" were not used at all. San Francisco has a number of indigenous habitat types that should be defined and described, but forest is not one of them. A forest is a complex ecosystem, not merely a stand of trees. Calling a plantation a forest perpetuates eco-illiteracy and calls into question the scientific orientation of the DEIR.
- 04 Missing from the Glossary – There's a puzzling omission of habitat types. The only one listed in the glossary is "wetland." "Scrub" is in the glossary, but as a vegetative form, not as a kind of habitat or biotic community. "Riparian" is in there, but not as a type of wetland. It would be helpful to see the habitat types listed in Table 10 defined in the Glossary. Also puzzling is that throughout the document, "grassland" is preceded by "native" but the other habitat types are not. Please explain.
- 05 Predators – Putting the feral cat problem under the heading "Predators" seems like an odd choice. While feral cats are indeed predators, that's not what makes them a problem. Natural predator-prey relationships are a good thing, part of the systems and processes that we are trying to protect and restore; the problem with feral cats is that they are predators that are not indigenous to our local ecosystems.
- GR- 7c—Undertake control of non- cat predators only where they are concentrated in such a manner that they are having a substantial effect on native wildlife populations.
- Why is there no differentiation between native and non-native predators? While native predators do sometimes need to be controlled, largely due to disproportionate population growth caused by human activity, the approaches to control should be different.
- ☐ GR-7b—Develop outreach materials to educate neighbors and users of Natural Areas about feral cats;
- Also needed are measures to educate the public about not feeding, intentionally or otherwise, any animals, predator or not, native or not.
- 06 p.41 During project activities, all trash that could attract predators would be properly contained, removed from the work site, and disposed of regularly.

Gravanis-1

06  
(Cont.) { Following project completion, all trash and construction debris would be removed from work areas.  
All trash that could attract any species, predator or not, should be contained and removed immediately.  
Thank you for considering my comments.

Sincerely,

Ruth Gravanis

Greenberg-1



**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 04:09 PM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject: Fw: Public Comments Regarding Dog Play Areas

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 04:09 PM -----



**Sharon Greenberg**

**<sharon.greenberg@sunlink.com>**

10/31/2011 03:53 PM

To: "bill.wycko@sfgov.org" <bill.wycko@sfgov.org>

cc

Subject: Public Comments Regarding Dog Play Areas

Hello-

01

I wanted to submit my comments regarding the elimination of close to 80% of dog play areas. I live in San Francisco and am a responsible dog owner. It makes it increasingly difficult to remain a responsible dog owner if the city continues to eliminate dog play areas. I believe most dog owners agree that our pets are like parts of our family and residents of San Francisco love living here. Please keep our dog play areas available so we can continue to love both our family pets and living in San Francisco.

I understand the desire to keep the habitat natural and not have dogs ruin that. In fact I support it. But eliminating the dog play areas is not the way to do it. I bet if you ask the dog owner community that uses these dog play areas they will be more than willing to help encourage the growth of natural plants in any way possible. Whether it be enforcing the boundaries of the dog play areas or contributing to the cause financially. Please help us keep our dog play areas available to us.

Sharon Greenberg | Director of Project Management | SunLink Corporation

v: 415.306.9826 | f: 415.925.9636

e: [sharon.greenberg@sunlink.com](mailto:sharon.greenberg@sunlink.com) | w: <http://www.sunlink.com>



Griggs-1

**From:** [Bill Wycko](#)  
**To:** [Jessica Range](#)  
**Subject:** Fw: dogs and park land (please read)  
**Date:** 10/05/2011 09:45 AM

---

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/05/2011 09:45 AM -----

**"Michael Griggs"**  
**<mgriggs@avenidas.org>**

To: <bill.wycko@sfgov.org>

cc:

10/05/2011 09:24 AM

Subject: dogs and park land (please read)

Hello Bill,

I just want to weigh in on this issue. First of all I love dogs and have been an owner in the past.

Someday I hope to have one again, when my home is not run by cats. On the matter though:

I have been a beach runner for a number of years now in San Francisco. I have also been

bitten by unleashed dogs three times, and harassed by them more times than I can count.

I ask: is this the way it should be? What is the answer? I don't know. I understand the reason

that people take dogs to the beach. If I had one I'd want to do the same. But the owners

must take responsibility for their dogs and keep them under control. My last bite was from

a large Rhodesian Ridgeback dog probably weighing 90lbs. I had three puncture wounds

and a large bruise from the bite. The owner came running up just after and got her dog under

control. She was profusely apologetic. Did her apologies help? In truth, no. This was at

the Ft. Funston area.

01

My point is twofold. I don't want to be bitten ever again, and I believe something must change.

The main problem is one of **enforcement** however. Dogs are already regulated by the rule-

*either on leash or under voice control of owner.* Obviously this is often not the case.

Griggs-1

01  
(Cont.)

It may require simply having officers or rangers on the ground watching over the beaches and parks in a more substantial manner. In all cases of my dog encounters, there has **never** been anyone of authority nearby. I now carry pepper spray with me and will use it. I know of no other solution for the time being.  
Sincerely  
M. Griggs

Grim-1



**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 11:46 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: NAP plans for SF parks

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 11:46 AM -----



**Dema Grim**

**<godemago@yahoo.com>**

10/31/2011 10:44 AM

Please respond to

Dema Grim

**<godemago@yahoo.com>**

To "bill.wycko@sfgov.org" <bill.wycko@sfgov.org>

cc

Subject NAP plans for SF parks

01

Dear Bill,

As a San Francisco resident and dog owner for 16 years I'm appalled at the proposed changes to off leash dog play areas in SF parks based on NAPs EIR. They don't seem to have any hard facts that dogs, indeed, cause erosion and harm to natural areas. In my own experiences at Fort Funston I've seen massive dune damage done by teenagers and their parents "sledding" down the dunes. With a growing number of families adding dogs to their households any reduction of outdoor off-leash play areas would be negatively impactful on the spaces that do remain.

I regularly use Glen Diamond park, Bernal Hill, Holly Park, MacLaren Park and Fort Funston to walk with my dogs and often observe dog owners picking up trash and performing plant maintenance. The negative impact of reducing available off leash play areas would be detrimental for EVERYONE....

best,  
dema

DEMA  
415.206.0500  
1038 valencia st  
san francisco, ca  
94110  
rock on with your frock on!  
<http://www.godemago.com>  
  
<http://dogsindanger.com>

Haire-1

Janet Haire  
4475 17<sup>th</sup> Street  
San Francisco CA 94114  
415.860.1942

**RECEIVED**

**NOV 18 2011**

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

November 17, 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,

I am a 12 year resident of the city of San Francisco, an avid golfer, a lover of the history of the great game of golf, and 'bow down' to Dr. Alister MacKenzie, arguably the greatest golf course architect that the world has ever known.

I am also the proud owner of a San Francisco resident golf card (#9034274), and consider myself unbelievably fortunate that one of the municipal courses at which I can make a tee time is the treasured Sharp Park.

That the city has this absolute jewel in its golf repertoire is an unbelievable gift that golfing populations across the globe would die for. That is loved by a diverse population of golfers, young, old, retired, black, white, male, female, and allows access to this scenic treasure for such modest fees, is truly magical.

01 [ Please, I beseech you, help us preserve this city treasure and support our efforts to keep Sharp Park intact.

Sincerely,



Janet Haire

Haire-1

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

---

Address List:

Congresswoman Jackie Speier  
Attn: Brian Perkins, Senior Advisor  
400 So. El Camino Real, #750  
San Mateo, CA. 94402  
[Brian.perkins@mail.house.gov](mailto:Brian.perkins@mail.house.gov)

Honorable Ed Lee  
Mayor, City and County of San Francisco  
City Hall  
1 Dr. Carlton B. Goodlett Pl.  
San Francisco, CA. 94102  
San Francisco Board of Supervisors  
[ed.lee@sfgov.org](mailto:ed.lee@sfgov.org)

Honorable Mary Ann Nihart  
Mayor, City of Pacifica  
170 Santa Maria Ave.  
Pacifica, Ca. 94404  
[nihartm@ci.pacifica.ca.us](mailto:nihartm@ci.pacifica.ca.us)

David Chiu, President  
San Francisco Board of Supervisors  
City Hall  
1 Dr. Carlton B. Goodlett Pl.  
San Francisco, CA. 94102  
[David.Chiu@sfgov.org](mailto:David.Chiu@sfgov.org)

Haire-1

Carole Groom, President  
San Mateo County Board of Supervisors  
400 County Center  
Redwood City, CA. 94063  
cgroom@co.sanmateo.ca.us

Philip Ginsburg, General Manager  
San Francisco Recreation and Parks Department  
McLaren Lodge-Golden Gate Park  
501 Stanyan St.  
San Francisco, CA 94117  
[pginsburg@sbcglobal.net](mailto:pginsburg@sbcglobal.net)  
[recpark.commission@sfgov.org](mailto:recpark.commission@sfgov.org)

Charles Edwin Chase, AIA, President  
San Francisco Historic Preservation Commission  
c/o Linda Avery, Commission Secretary  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103  
[Linda.avery@sfgov.org](mailto:Linda.avery@sfgov.org)

San Francisco Public Golf Alliance  
Attn: Richard Harris  
1370 Masonic Ave.  
San Francisco, CA. 94117  
[Richard@erskinetulley.com](mailto:Richard@erskinetulley.com)

Hammer-1



**Bill Wycko/CTYPLN/SFGOV**  
10/31/2011 11:42 AM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject: Fw: stop the plan to reduce dog areas

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 11:42 AM -----



**Milo Hammer**  
<milohighschool@yahoo.com>  
>

To: "Bill.wycko@sfgov.org" <Bill.wycko@sfgov.org>

cc

10/31/2011 11:41 AM

Subject: stop the plan to reduce dog areas

Please respond to  
Milo Hammer  
<milohighschool@yahoo.com>

01

Hi

I am a dog owner and a dog lover, as are thousands and thousands of others in SF. The plan by the Natural Areas Program Plan is seriously flawed and must be stopped. There is no proof that dogs are destroying the natural areas. Don't allow these anti-dog people to ruin it for thousands of people and their dogs. We need to be able to continue taking our dogs to Ft. Funston, and Bernal Hill, and McLaren Park and all the other off-leash areas. Dogs are an important part of our society. Please listen to the dog owners. Thank you.  
Milo

Hartnett-1

RECEIVED

OCT 28 2011

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT

10/26/2011

01

As a resident of SF, and owner of a dog, I think of SF as a dog friendly city. Your wanting to restrict off leash areas is ridiculous. You should be looking to increase off leash areas.

I take my dog to Douglas Park for 1 hour every pm. It is good for me and my dog.

I oppose any restrictions to off leash areas.

WILLIAM E HARTNETT  
54 FAIR OAKS ST  
SAN FRANCISCO, CA 94110  
EM whartn@pacbell.net



Hasbrouck-1

**From:** Bill Wycko  
**To:** Jessica Range  
**Subject:** Fw: Dog play areas  
**Date:** 10/04/2011 11:06 AM

---

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/04/2011 11:07 AM -----

**"Edward Hasbrouck"**  
**<edward@hasbrouck.org>**

To bill.wycko@sfgov.org  
 cc

10/04/2011 12:03 PM

Subject Dog play areas

Please enter these comments in your docket of public responses to the draft environmental impact review regarding "dog play areas" on Bernal Hill and in other parks in the city.

01

I strongly urge you to make elimination of off-leash "dog play areas" the preferred alternative or, as the next-best alternative, to reduce the amount of public space dedicated to this use as much as possible.

Off-leash dogs pose a danger that (1) deprives other members of the public of use of these areas, and (2) cannot be mitigated by training of dogs or other rules.

Dog owners cannot be relied on to know with certainty how \*their\* dogs will behave. Dogs can and do behave in ways that surprise their "owners".

I have routinely been menaced and sometimes chased by dogs whose owners told me, "S/he's only being friendly". Even if the dog intended chasing or lunging at me to be a "friendly" act, its effect was to endanger me.

I have routinely had people tell me they were surprised at the behavior of their dog, or that "S/he doesn't usually act like this". All of which just goes to show how fallible dog owners' beliefs and expectations can be.

Dogs instinctively chase large animal-sized objects, which leads even otherwise well-behaved dogs to surprise their owners by chasing bicycles.

Dogs are by nature pack animals, and behave differently in packs than as individuals. This makes it impassible for any dog owner to predict how their dog will behave the first time they are let loos in pack, off leash.

Some people may say, "\*My\* dog wouldn't do that." This might be true, but \*some\* dogs (it's impossible to predict which) will act like that.

A rational pedestrian or bicyclist \*must\* assume -- because there is no way to know otherwise -- that \*any\* dog might, without warning, lunge at them. The only way to stay safe around dogs is for them to be leashed, so that those who don't wish to risk being attacked or chased can stay out of reach beyond the length of the lease.

An off-leash dog area is \*inherently\* dangerous. The \*only\* way for pedestrians and bicyclists to stay safe is to stay away from such areas entirely. In operating such an area the City and County is creating and knowingly tolerating a dangerous public nuisance.

01  
 (Cont.)

San Francisco is one of the densest cities, with the least public space per capita, in the country. Choosing to dedicate space to off-leash dog play, when that denies the use of that space to other would-be users, is an inappropriate use of public land and resources.

The City and County needs to consider the needs of people first, and pets second. There may be fewer play areas for dogs in the city than dog-

Hasbrouck-1

01  
(Cont.) { owners would like, but dogs don't belong in the city, people do, and there are certainly too few outdoor play areas for people!  
Please, give me back the opportunity to enjoy Bernal Hill without risk of dog assault by eliminating (or reducing as much as possible) the off-leash dog play areas there and throughout San Francisco.

Edward Hasbrouck  
1130 Treat Ave.  
San Francisco, CA 94110  
415-824-8562

-----  
Edward Hasbrouck  
<edward@hasbrouck.org>  
<<http://hasbrouck.org>>  
<<http://twitter.com/ehasbrouck>>  
+1-415-824-0214

5th edition of "The Practical Nomad: How to Travel Around the World"  
in bookstores worldwide in October 2011, available now for pre-order:  
<http://hasbrouck.org/PN>

Hatch-1



**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 09:10 AM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject: Fw: Natural Areas Plan

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:11 AM -----



**Alex & Emily**

<alexemily\_@hotmail.com>

10/31/2011 08:14 AM

To: <bill.wycko@sfgov.org>

cc

Subject: Natural Areas Plan

Dear Mr. Wycko

01

Please do whatever you can to save what is left of San Francisco's natural areas. If that means separating out the golf course at Sharps Park that may be what has to be done. But, the important thing is to leave some open space which can be used by the wildlife which is still left in our city. It will improve the environment the animals and the people who live there.

Thank you

A native San Franciscan

Caroline Hatch

people take different roads seeking fulfillment & happiness. just because they're not on your road doesn't mean they've gotten lost.

-cesare di bonesana beccaria-

Hayes-1

**RECEIVED**

NOV 01 2016

Dear Mr. Wycko, Environmental Review Officer, **CITY & COUNTY OF S.F.**  
PLANNING DEPARTMENT  
S.F. CA

As an educator and person raising a family in San Francisco, it is very important that you help this plan pass...I teach local kids and take my family into San Francisco's Natural Areas almost everyday! We need this plan to have as a base line to protect the beautiful wildlife and open spaces we still have for all to enjoy!

01

The Draft Environmental Impact Report for SNRAMP has received a more than adequate and therefore accurate and complete review of the plan. It has considered the total range of potential impacts to our City's open space and uses and how to manage them for sustainability!

02

Furthermore, it is consistent with the direction for sustainable management of San Francisco's open spaces as detailed already through the Recreation and Open Space Element (ROSE), the Public Utilities Commission (PUC) water saving mandates, and the City's Sustainability Plan.

Please help pass the Draft Environmental Impact Report for the Significant Natural Resource Areas Management Plan!

Sincerely,

Dylan, Veronica and Isa Hayes ☺



Hecht-1

October 28, 2011

Public Comment on Draft Environmental Impact Report for the Significant  
Natural Resources Areas Management Plan

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

Dear Mr Wycko,

I write regarding the Public Comment on Draft Environmental Impact Report for  
the Significant Natural Resources Areas Management Plan.

01

For the past decade my business, Second Nature Design, has been dedicated to sustainable landscape design. My emphasis is habitat restoration and rehabilitation, one urban garden at a time. During my longtime work with Friends of the Urban Forest I helped establish the Ongoing Tree Care Program, organizing and participating in the hands-on care of many of our tens of thousands of street trees throughout the San Francisco area. I am a huge proponent of native plants, particularly trees. However, destroying our existing mature Urban Forest whether in our parklands or on the streets under the rubric "restoration ecology" is absurd.

02

The Natural Areas Program's (NAP) plan would decimate our existing Urban Forest, including such a unique ecotope as Sutro Woods. The NAP plan relies on false thinking, is a waste of scarce resource, and is an aesthetic abomination. It is true as the plan's proponents state San Francisco once had no Urban Forest. But

Hecht-1

02  
(Cont.)

it is also true as proponents ignore that San Francisco once had no miles of roadways, concrete paving and buildings, an electrical grid and a dense population driving automobiles. The proponents of the plan never answer the question "What will sequester the off-gassing of these elements other than our Urban Forest's trees?"

The answer is obvious to me and to others who work with sustainable landscaping; we need our existing trees to sustain the environment in which we live. Additionally, visit one of the many treeless San Francisco neighborhoods to understand the dismal, lifeless future of a treeless San Francisco.

03

Another important consideration of the NAP "cleansing" program is the pollution it would create. How will the trees now growing, adding pleasant ambiance, softening the hard concrete be removed but with polluting equipment? How will the silent sequesters of carbon be transported once fallen but via polluting vehicles? And where will all the growing trees once felled go but to the already over-taxed landfill?

04

I agree whole heartedly with Professor Arthur Shapiro's evaluation, "The creation of small, easily managed, and educational simulacra of presumed pre-European vegetation on San Francisco public lands is a thoroughly worthwhile and, to me, desirable project. ...The proposed wholesale habitat conversion advocated here does serious *harm*, both locally (in terms of community enjoyment of public resources) and globally (in terms of carbon balance-urban forests sequester lots of carbon; artificial grasslands do not). At both levels, wholesale tree removal, except for reasons of public safety, is sheer folly."

Thank you for your attention this tremendously germane topic and for considering a green future for all forms of significant habitat in San Francisco.

Sincerely,  
Alma Hecht, APLD/ISA

Heldman-1

**Bill Wycko/CTYPLN/SFGOV**

06/06/2012 09:44 AM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc:

bcc:

Subject

— Forwarded by: Bill Wycko/CTYPLN/SFGOV on 06/06/2012 09:44 AM —

**Mary Heldman**

&lt;maryheld@pacbell.net&gt;

06/05/2012 11:36 PM

To: "bill wycko" &lt;bill.wycko@sfgov.org&gt;, "Scott Wiener" &lt;smtp107.sbc.mail.ne1.yahoo.com&gt;, scott.wiener@sfgov.org

cc: "John Avalos" &lt;John.Avalos@sfgov.org&gt;, "Sean Elsbernd" &lt;Sean.Elsbernd@sfgov.org&gt;, "David Chiu" &lt;David.Chiu@sfgov.org&gt;, "Carmen Chu" &lt;Carmen.Chu@sfgov.org&gt;, "Malia Cohen" &lt;malia.cohen@sfgov.org&gt;, "Eric Mar" &lt;Eric.L.Mar@sfgov.org&gt;, "Jane Kim" &lt;jane.kim@sfgov.org&gt;, "Christina Olague" &lt;Christina.Olague@sfgov.org&gt;, "David Campos" &lt;David.Campos@sfgov.org&gt;, "Mark Farrell" &lt;mark.farrell@sfgov.org&gt;, "Ed Lee" &lt;mayoredwinlee@sfgov.org&gt;

Subject

Dear Mr. Wycko,

- 01 { I'm opposed to cutting down healthy trees and the use of pesticides. The plan would have a significantly negative impact with respect to wind, shade, hydrology water quality, and forest resources.
- 02 { In addition, the "non-native" argument seems to me to be arbitrary. One can choose whatever date he/she wants to characterize a specific kind of vegetation as "native." There may well have been other times in the past, before the introduction of the eucalyptus, where then "native" plants were out-competed by some other new vegetation.
- 03 { I favor the Maintenance Alternative.

Sincerely,

Mary Heldman, 94115

Hershkovitz-1

**From:** [Bill Wycko](#)  
**To:** [Jessica Range](#)  
**Subject:** Fw: Dogs in the Park  
**Date:** 10/04/2011 02:34 PM

---

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/04/2011 02:35 PM -----

**"Daniel A. Hershkovitz"**  
**<mrdantastic@yahoo.com>**

To: [bill.wycko@sfgov.org](mailto:bill.wycko@sfgov.org)  
cc: [john.lucania <johndabomb@gmail.com>](mailto:john.lucania@johndabomb@gmail.com)  
Subject: Dogs in the Park

10/04/2011 02:33 PM

Please respond to  
[mrdantastic@yahoo.com](mailto:mrdantastic@yahoo.com)

Bill:

01

I understand this is a "hot-button" issue for so many folks on both sides. I understand both arguments and seek a healthy compromise. Your leadership is crucial. First, don't forget the montre of all responsible politicians -- if it is not broke, don't fix it. Second, if there are serious issues and concerns requiring some action, let's think of ways to address specific problems, including perhaps: 1) better fencing of our parks; 2) City-provided doggie poop bags; and 3) Park and Rec lead clean-up days in which the dog owners could be put to work to keep the parks in nice condition.

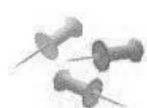
San Francisco is a dog town. Dog owners keep property prices high. Let's not screw that up.

**DANIEL HERSHKOWITZ, Esq.**  
**Broker/Owner**  
**SCHOLARSHIP HOMES & REAL ESTATE**  
**Tel: 415 577-9065**  
**Fax: 415 449-3654**  
**WWW.MRDANTASTIC.COM**

**977 Duncan Street**  
**San Francisco, CA 94131**



Hess-1

**Bill Wycko/CTYPLN/SFGOV**

05/29/2012 08:50 AM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc:

bcc:

Subject: Fw: sfforestnews@gmail.com

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 05/29/2012 08:50 AM —

**Claire Hess**

&lt;chelenhess@gmail.com&gt;

05/27/2012 12:15 PM

To: bill.wycko@sfgov.org

cc: David Hess <hessdf@gmail.com>, David Young  
<mrdavidyoung@gmail.com>, dzisser@aol.com

Subject: sfforestnews@gmail.com

- 01 { Good morning Mr. Wycko. My mother, husband, son, brother and I would like to let you know that we strongly oppose NAP's plans to remove trees from Mt. Davidson. I was raised in the house on Robinhood Drive that my mother still lives in. It is 1 1/2 blocks from our beautiful Mt. Davidson. My life was so much more complete growing up in the city having the gorgeous Mountain to explore, blackberries to pick and Easter Sunrise services to attend.
- I still spend much time walking our dog on Mt. Davidson and it is a real highlight of our visits to San Francisco.
- We oppose NAP's plans for the following reasons:
- (1) Mt. Davidson is a beautiful, cathedral like area providing serene relief for city dwellers and their dogs. NAP's plans will destroy this meditative place and rob dog walkers and humans of much of the access.
- 02 { (2) The trees have been there for over 100 years. It is not on a sprinkler or drip irrigation system because the trees create their own mini-atmosphere of fog and keep the area moist for vegetation and animals. NAP's claims that it isn't "natural" are ill-founded because not only does it survive on its' own but it also provides a significant habitat for animals and birds. We do not believe an area must be "original natural" to merit survival.
- 03 { (3) Some of the animals and birds I have spotted that would lose this important habitat include hawks, owls, coyotes, hummingbirds, skunks, rabbits, opossum, red-winged blackbirds, ravens and crows. What a terrible thing it would be to destroy their home.
- 04 { (4) My understanding is cutting the trees down would increase fire danger as there would no longer be enough trees to create their own moist atmosphere.
- 05 { (5) In our conversations with Greg Gaar of NAP he was not provided an answer to our question regarding whether tree stumps will be removed immediately if at all. Leaving behind

Hess-1

- 05 [ (Cont.) stumps would certainly blight the area.
- 06 [ (6) According to the SF Forest Alliance, the most toxic herbicides would continue to be used.
- 07 [ (7) Per the SF Forest Alliance taxpayer funds will be diverted to pay for this destruction and blight.
- 08 [ Overall this magical and serene area must be protected for the public benefit and enjoyment and for the protection of this priceless natural habitat.

Please help the SF Forest Alliance to stop this tragedy.

Thank you for your attention to this most pressing matter.

Sincerely,

Claire Hess, David Hess, David Young, Helen Zisser and David Zisser.

Our respective Zip Codes are Reno Nevada 89509, Washington D.C. 20009, San Francisco 94127 and San Francisco 94115,

Hochschild-1



**Bill Wycko/CTYPLN/SFGOV**

10/27/2011 11:24 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: Save off leash areas

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/27/2011 11:24 AM —



**Frances Hochschild**

**<fhochschild@yahoo.com>**

10/26/2011 09:22 PM

Please respond to  
Frances Hochschild  
<fhochschild@post.harvard.ed  
u>

To "bill.wycko@sfgov.org" <bill.wycko@sfgov.org>

cc

Subject Save off leash areas

01

As a lifelong San Francisco resident with both a young child and a dog, I'm writing in support of maintaining the current off-leash areas. While it's wonderful that areas are being restored, let's allow all San Franciscans the opportunity to enjoy our parks. There are already very limited areas allowing dogs off-leash so would be great if they could be maintained at current levels. My mother, Christie Hochschild joins me in voicing our support for off-leash areas as well.

Thank you

Frances Hochschild

Christie Hochschild

Isabella Hochschild

2517 Broadway St

San Francisco, CA 94115

Holzman-1



BARBARA A. HOLZMAN, PHD  
DEPARTMENT OF GEOGRAPHY AND HUMAN ENVIRONMENTAL STUDIES  
1600 Holloway Avenue  
San Francisco, CA 94132  
Tel: 415/338-7506

October 25, 2011

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

RECEIVED

OCT 28 2011

Re: DEIR for SNRAMP

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

Dear Mr. Wycko,

01 I have reviewed the Draft Environmental Impact Report for SNRAMP and wanted to make a few comments. I am the Director of the Environmental Studies program and professor of Biogeography at SFSU and have been involved in research and education at SFSU in the natural areas of San Francisco for many years. I think the natural areas are critical to the health of San Francisco and its citizens and urge you to go forward with certifying the EIR and allow SF Recreation and Parks, Natural Areas Program to continue to manage these critical natural areas within the city by implementing the SFNAP Management plan.

02 I feel that the Draft EIR is adequate, accurate and complete and urge you to certify the document without further delay. The Natural Areas Program's mission is to maintain and enhance natural areas in San Francisco and the plan and creators of the Natural Areas Management Plan spent a great deal of time in discussions with the scientific community and citizens of San Francisco to create a plan that best served the citizenry and the critical need of maintaining and enhancing natural areas. The EIR reviewing this management plan considers a broad range of potential impacts to our City's resources and proposes mitigation measures to address impacts where possible to lessen any perceived impacts and recognizes that some impacts may be unavoidable.

03 I believe the EIR accurately depicts the majority of potential impacts that could occur with plan implementation as less than significant and in need of no significant changes to the plan. The management plan in creating the recommended actions considered alternatives and attempted to achieve the greatest good with the least amount of negative impact and I believe this was accomplished and the DEIR attests to that. The initial management plan was based on detailed studies and scientific experts and is 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.

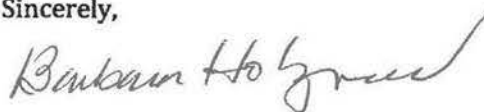
04 The Significant Natural Resource Areas Management Plan (SNRAMP) is an innovative management plan to safeguard our City's Natural Areas. Its implementation will help prevent the local extinction of plants and animals, improve habitat for wildlife, increase safety, and improve access and recreational use in Natural Areas. The plan provides clear direction to the City on how to prioritize management and restoration of our Natural Areas and is the most cost effective method for

Holzman-1

- 04 [ managing our resources and protecting these areas for future generations.  
(Cont.)
- 05 [ There are two potential impacts addressed in the DEIR that I think may deserve some consideration. Those two areas of impact were Sharp Park Golf Course historical resources and lessening recreation opportunities. The impacts anticipated to Sharp Park Golf Course in reference to historical resources seem well worth the preservation and restoration of the endangered species present at the location. Clearly in this case, the global benefits of biodiversity outweigh any "historical" impacts particularly since those impacts to historical resources temporally minute compared to the evolutionary history of these endangered species such management would benefit.
- 06 [ The potential cumulative impacts discussed re: Impact RE-7: does not address the potential for an increase in passive recreation; i.e., the ability of citizens to appreciate the natural landscape and wildlife that would improve with the plan, or the lessening of dog-people/children conflicts in areas where dogs off leash would be curtailed. I would suggest the overall recreation opportunities when passive recreation is included would be increased if the plan was implemented.
- 01 [ In sum although the potential for impacts of that addressed above may be unavoidable I think that  
(Cont) the benefits far outweigh the impacts and that the project should continue as planned.
- The SNRAMP goals are incredibly valuable to the city as well as globally and can create opportunities for collaboration with community groups and SF institutions such as San Francisco State University. I have had many students who have done research projects in the Natural Areas and I use the Natural Areas often in my classes for field trips, volunteer experiences or opportunities for students to encounter the last remnants of San Francisco's former biodiversity. I look forward to moving forward and getting our students and scientists involved with the implementation phases of the plan.
- 07 [ San Francisco has a responsibility locally, regionally, and globally to protect and enhance the native remnants of this unique city. As reported in the EIR, the Maximum Restoration Alternative is the Environmentally Superior Alternative and should be pursued.

Thank you for your attention.

Sincerely,



Barbara Holzman, PhD

email: bholzman@sfsu.edu

Hooker-1



Bill Wycko/CTYPLN/SFGOV

10/31/2011 09:11 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: Natural Areas Program Environmental Impact Review

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:12 AM -----



steve hooker

<stvhooker3@gmail.com>

10/31/2011 07:26 AM

To bill.wycko@sfgov.org

cc

Subject Natural Areas Program Environmental Impact Review

Oct. 29, 2011

Bill Wycko, Environmental Review Officer

SF Planning Department

1650 Mission Street, Suite 400

San Francisco, CA 94103

[bill.wycko@sfgov.org](mailto: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

Hooker-1

02 [ propose new dog play areas.  
(Cont.)

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

The NAP program is based on non science, and the logic behind it is wrong as well. It would have us give up our recreational areas so that the beautiful, old trees can be eliminated in favor of grasses and plants that "should be there in the minds of the plans proponents, at some arbitrary point in time, back before we planted anything of our own choosing. It also uses toxic pesticides and chemicals to deal with the stumps. Add to that the fact that there is never enough money or man-power to maintain these resoration "science" projects, and what you have is a nightmare scenario for our beloved parks. I have been going to those parks for decades. This is not what they need. Someone needs to put a stop to the NAP program. If not, they need to tell us citizens of SF what's so good about it. It wastes our money and destroys our trees. It locks us out of our parks.

04

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,

Steve Hooker

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Horn-1



RECEIVED  
OCT 31 2011  
CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
M E A

October 26, 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 [ I am writing to endorse the decision to designate  
Sharp Park Golf Course as an "historical resource."

While I am not a resident of San Francisco, I am an avid golfer who has played numerous public and private golf courses in the Bay Area, including Sharp Park.

I am the founder of Transact Business Consulting, and chief operating officer of ProLynx LLC a biotechnology start up in the Bay Area. I am currently a director at Lake Merced Golf Club and I am the co-chair of the 2012 U.S. Girls' Jr. Championship to be held at Lake Merced next July. I have been a coach for the First Tee of San Francisco at Harding Park and previously at Golden Gate (when Harding was closed for the President's cup).

02 [ Golf is a tremendous sport that provides exercise, enjoyment of the outdoors and underscores sportsmanship, integrity and related values. Sharp Park is a unique asset of San Francisco. The course is known by golfers around the world and has been enjoyed by local golfers because of its unique ocean side location.



Horn-1

01  
(Cont)

Sharp Park is a fine representation of the mastery of course architect Dr. Alister MacKenzie. The course today boasts many of the aspects of course design espoused by Dr. MacKenzie, perhaps the greatest course architect in history, when it was created nearly 80 years ago. Over the years, like all things, the course has lost some of its luster but the underlying beauty remains. Given

02  
(Cont)

appropriate tender, loving care this course, which remains a gem available to all golfers, will shine again. In this day and age when people are working extra hard for their money and more and more enjoyable activities are getting further out of reach, it is important for us to keep this type of recreational facility open for the enjoyment of low/modest income golfers.

01  
(Cont)

I am gratified that the City and County of San Francisco support Sharp Park Golf Course as a public resource worthy of preservation. For all these reasons, as well as those expressed in the San Francisco Public Golf Alliances's letter dated September 20, 2011, I am proud to support the designation of Sharp Park Golf Course as an historic resource under the California Environmental Quality Act.

Respectfully submitted,



Margaret A. Horn, J.D.

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

Hovland-1

NAP Comment—Madeline Hovland

October 27, 2011

Mr. Bill Wycko  
San Francisco Planning Department

Re: DRAFT EIR, NATURAL AREAS PROGRAM

Dear Mr. Wycko:

01

I am strongly opposed to the destruction of non-native trees and other non-native vegetation in an attempt to restore native habitat. There is no scientific evidence to support the idea that native plant restoration is environmentally superior to a habitat that includes a diversity of tree and plant species, whether they are native or introduced to this part of California. Also, many plants and trees that thrived before the Europeans arrived here are no longer suitable for this climate and require a lot of watering and weeding (i.e. gardening) to create conditions that might make them grow as long as a great deal of energy (and water) are put into maintaining them. As the climate continues to change, native plants and trees will become even less likely to survive, no matter how much TLC is given them.

In a time when our economy is faltering, and every dollar is important, it is critical that money not be wasted on programs that are of no benefit to humans. Peter Kareiva, chief scientist of the Nature Conservancy, in the spring issue of Nature Conservancy magazine, wrote, "Nature must be managed for people." Attempting to restore the landscapes of some long-ago era is as much a "losing game," as attempting to protect nature from people. To read Mr. Kareiva's important article online, please see: <http://www.nature.org/newsfeatures/magazine/beyond-man-vs-nature.xml>

I will address in this comment primarily issues of flammability since I am a member of the Hills Conservation Network (HCN), an Oakland non-profit organization that is dedicated to fire prevention, especially fire-risk mitigation of flammable vegetation in Oakland's North Hills. Our grassroots organization is comprised mostly of survivors of the 1991 Oakland-Berkeley Hills fire. One of our founding members lost not only his home but his disabled mother in that fire.

There were many reasons why that tragic fire spread so quickly and caused so much damage to both property and lives. We who began HCN know that advocates of native plant restoration in the East Bay used the fire to scapegoat the non-native trees, hoping to remove hundreds of thousands of non-native trees and non-native vegetation in this area by fanning residents' fear of another fire.

We responded to the claims of the nativists by thoroughly researching the subject of native plant restoration. We now publish a newsletter that informs our readers on the results of our research. Because we are a group of fire survivors who still live in the area that burned in the 1991 fire, we care perhaps more than anyone else about fire safety.

02

The most important statement I can make to you is that there is absolutely no evidence to support the idea that native plants are, by their nature, more resistant to fire than non-natives. It is the characteristics of a plant or tree that make it more or less flammable. For example, it is true that oily leaves make the non-native blue-gum eucalyptus flammable if fire reaches the crown of the tree. Yet, according to the USDA, blue gum leaves are classed as "intermediate in their resistance to combustion, and juvenile leaves are highly resistant to flaming."

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OCT 31 2011

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

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Hovland-1

NAP Comment—Madeline Hovland

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<http://www.fas.fed.us/database/feis/plants/tree/eucglo/all.html>

If a tree is well-maintained, with understory removed and branches cut that grow less than 6-8 feet from the ground, there is very little risk of fire reaching the crown of a tall tree.

Moreover, the trunk of a eucalyptus tree, especially the trunks of older eucs, are not easy to burn; the trunks of oaks (of the same diameter) burn much more quickly. In fact, many blue gum eucalyptus trees in the North Hills survived the 1991 fire. I know this from my own observation and experience. The fire stopped, up the street from my house on Alvarado Road, at three giant eucalyptus trees that the flames did not even singe. The fire did burn to the ground all of the vegetation, including several coast live oaks, across the street from my house.

What about those oily leaves? The oils in leaves of blue gum eucalyptus trees range from less than 1.5 to over 3.5%. <http://www.ansci.cornell.edu/plants/medicinal/eucalyp.html/> Our research has shown that the leaves of native bay trees contain more oil (7.5%) than the leaves of a blue gum eucalyptus. That is twice the amount of oil in leaves of blue gum eucalyptus! <http://www.paleotechnics.com/Articles/Bayarticle.html>

Bay trees in their scrub form, often growing as understory to oak trees, are highly flammable because the oily leaves (and oily branches) grow close to the ground, which is often covered in tall grass that dries out at the height of the fire season.

On page 396 the EIR notes the “high fire hazard rating of aging French broom and eucalyptus.” It is amazing to me that the EIR considers French broom and eucalyptus to be similar in fire hazard risk since they are totally different species with completely different characteristics. French broom, like native coyote bush, is highly flammable; in fact, coyote bush, like most native chaparral species, especially manzanitas, chamise, buck brush scrub oaks, and mountain mahogany, are more flammable than French broom because they contain more dead wood than French broom, and their leaves are small and oily. According to Napafirewise.org, chaparral species grow in dense stands that “create impenetrable fields that burn with intense heat and are very difficult to suppress or control.. chaparral species are the hardest to manage and to keep fire safe.”

According to the Hills Emergency Forum, all brush communities, which include chaparral, can reach flames in excess of 69 feet. Grassland fires (made up of native and/or non-native grasses) can reach flame lengths of 12-38 feet. There is no scientific evidence (only wishful thinking) to support the idea that native grasses are more resistant to fire than non-native grass. The way to prevent ignition through a carelessly thrown cigarette or a spark from a catalytic converter is to keep the grass short (and watered if possible, especially in the fire season).

What about flame lengths in a eucalyptus grove? The EIR does not mention that flame lengths in a eucalyptus grove range from 6-21 feet, depending on the depth of litter under the trees. Eucs are in fact the only tree species where the depth of the litter under the tree is considered in estimating flame length even though several other tree species produce litter that is drier (more conducive to ignition) than the moist litter under eucalyptus trees. If the euc litter is regularly picked up, flame lengths are even lower.

It is astounding to me that that the EIR constantly employs the use of the words “highly flammable” with “eucalyptus trees,” as if repeating that epithet will convince readers of its truth. As I have written

Hovland-1

NAP Comment—Madeline Hovland

3

02  
(Cont.)

above, eucalyptus trees have been scapegoated and vilified to suit the agenda of nativists. There is no reason to believe that native trees are resistant to fire. In prehistoric times, the Native Americans set fire to meadows of native grass and hills of native chaparral with scrub oaks and bays. In those days before non-native trees had been introduced, Native Americans had no trouble setting these fires on a regular basis for hunting and harvesting purposes.

There is no scientific evidence for the claim that native plants and trees are less flammable than non-natives. The characteristics of some plants and trees make them easier to ignite and quicker than burn than others, but whether they are native or non-native has nothing to do with how flammable they are. Fire does not discriminate between native and non-native vegetation. It is the advocates of native plant restoration who discriminate because they are determined to advance their own irrational agenda.

Please do not expand the Natural Areas Program. It is a waste of taxpayer money to promote and support a program that is essentially unscientific and anti-evolution.

Sincerely yours,



Madeline Hovland  
781 Alvarado Road, Berkeley, CA 94705

Hu-1

**Range, Jessica**

---

**From:** Bill Wycko  
**Sent:** Monday, June 11, 2012 12:40 PM  
**To:** Jessica Range  
**Subject:** Fw: RPD Natural Areas Program DEIR comment

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 06/11/2012 12:40 PM -----

**khu**  
 <[brainz\\_ca@yahoo.com](mailto:brainz_ca@yahoo.com)>      [Tobill.wycko@sfgov.org](mailto:Tobill.wycko@sfgov.org)  
 06/11/2012 11:27 AM      cc

Subject: RPD Natural Areas Program DEIR comment

June 11, 2012

To: Bill Wycko

Environmental Review Officer

SF Planning Dept.

Email: [bill.wycko@sfgov.org](mailto:bill.wycko@sfgov.org)

FAX: 415 558-6409

**Re: Comment on RPD Natural Areas Program DEIR**

I was reluctant to submit comment because I fear my comment will be dismissed being from a “one of the dog people.” However, if comments are being tallied pro and con, **I want my letter to be tallied as a critic of the NAP DEIR.**

(In the early 2000’s people who walked with their dogs in the parks were some of the first park visitors to become aware of the actions and plans of the natural areas program. Dog walkers were the “canary in the coalmine,” in alerting the public to the trail closures and the need for public oversight of the Natural Areas Program. Since then, some supporters of the NAP have tended to dismiss any criticism of the NAP if it came from a dog owner.)

Yes, I am concerned about the loss of recreational access in SF parks. But that is only one of many concerns. I am also concerned about NAP’s violations of existing regulations protecting wildlife and the use of herbicides, NAP actions that are contrary to scientific evidence (or lack supporting scientific evidence), as well as numerous other NAP actions detailed in comments submitted by others.

**I fully support the detailed DEIR comment earlier submitted by the SF Forest Alliance, as well as the comment submitted by Dr. Arthur Shapiro, UC Davis professor of ecology. The**

Hu-1

**DEIR needs to respond to these criticisms and to be thorough revised.** (Note: I could include detailed comments, probably already expressed by the SF Forest Alliance and Dr. Shapiro, but that would be redundant and a waste of your time (i.e. my tax dollars) as well as my time. However, if detailed comment is necessary to be counted as substantive comment, let me know and I will submit a longer comment.)

Sincerely,

Karin Hu

334 San Leandro Way, SF 94127

[brainz\\_ca@yahoo.com](mailto:brainz_ca@yahoo.com)

Huebsch-1

RECEIVED

OCT 13 2016

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
MEXICO

Dear Mr. Wyco,

I have copied the article written by Professor Shapiro of UC Davis. I totally support his position.

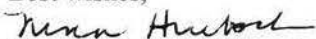
01

I am a resident of Bernal Heights. I frequently take my dog to run on the Bernal Hill. My dog does not dig or disturb the natural environment. I would be terribly sad and upset if this area was closed to dogs. My upset and sadness would be for several reasons. There needs to be open space for dogs in San Francisco. The neighborhood (dog owners and non-dog owners) use the Bernal Hill park a great deal. The habitat that exists is "natural" and supports the current use. GGNRA and SF Parks focus on habitat restoration is wrong. Given the limited budgets that all government agencies must live with, it seems wrong to expend funds on unneeded habitat restoration. Better use of the funds would be on general park restoration. Precita Park and Holly Park are great examples for using funds to restore parks. The result is that neighbors use the parks and feel a greater alliance to their neighborhoods, making them safer and more livable for all.

02

I request that you drop your plan to close the parks to dogs for habitat restoration. There are many, many dog owners in San Francisco. I believe that dog owners will vote their interests and there is no reason to assume that the SF Planning Department is beyond the influence of the will of the voters.

Best wishes,



Nina Huebsch, 144 Nevada Street, SF, CA 94110

Mr. Bill Wycko

San Francisco Planning Department

Re: DRAFT EIR, NATURAL AREAS PROGRAM

Dear Mr. Wycko:

Consistent with the policy of the University of California, I wish to state at the outset that the opinions stated in this letter are my own and should not be construed as being those of the Regents, the University of California, or any administrative entity thereof. My affiliation is presented for purposes of identification only. However, my academic qualifications are relevant to what I am about to say. I am a professional ecologist (B.A. University of Pennsylvania, Ph.D. Cornell University) and have been on the faculty of U.C. Davis since 1971, where I have taught General Ecology, Evolutionary Ecology, Community Ecology, Philosophy of Biology, Biogeography, Tropical Ecology, Paleocology, Global Change, Chemical Ecology, and Principles of Systematics. I have trained some 15 Ph.D.s, many of whom are now tenured faculty at institutions including the University of Massachusetts, University of Tennessee, University of Nevada-Reno, Texas State University, and Long Beach State University, and some of whom are now in government agencies or in private consulting or industry. I am an or the author of some 350 scientific publications and reviews. The point is that I do have the *bona fides* to say what I am about to say.

At a time when public funds are exceedingly scarce and strict prioritization is mandatory, I am frankly appalled that San Francisco is considering major expenditures directed toward so-called "restoration ecology." "Restoration ecology" is a euphemism for a kind of gardening informed by an almost cultish veneration of the "native" and abhorrence of the naturalized, which is commonly characterized as "invasive." Let me make this clear: *neither "restoration" nor conservation can be mandated by science—only informed by it.* The decision of what actions to take may be motivated by many things, including politics, esthetics, economics and even religion, but it cannot be science-driven.



Huebsch-1

In the case of “restoration ecology,” the goal is the creation of a simulacrum of what is believed to have been present at some (essentially arbitrary) point in the past. I say a simulacrum, because almost always there are no studies of what was actually there from a functional standpoint; usually there are no studies at all beyond the merely (and superficially) descriptive. Whatever the reason for desiring to create such a simulacrum, it must be recognized that it is just as much a garden as any home rock garden and will almost never be capable of being self-sustaining without constant maintenance; it is *not going to be a “natural,” self-regulating ecosystem*. The reason for that is that the ground rules today are not those that obtained when the prototype is thought to have existed. The context has changed; the climate has changed; the pool of potential colonizing species has changed, often drastically. Attempts to “restore” prairie in the upper Midwest in the face of European Blackthorn invasion have proven Sisyphean. And they are the norm, not the exception.

The creation of small, easily managed, and educational simulacra of presumed pre-European vegetation on San Francisco public lands is a thoroughly worthwhile and, to me, desirable project. *Wholesale habitat conversion is not.*

A significant reaction against the excesses of the “native plant movement” is setting up within the profession of ecology, and there has been a recent spate of articles arguing that hostility to “invasives” has gone too far—that many exotic species are providing valuable ecological services and that, as in cases I have studied and published on, in the altered context of our so-called “Anthropocene Epoch” such services are not merely valuable but *essential*. This is a letter, not a monograph, but I would be glad to expand on this point if asked to do so.

I am an evolutionary ecologist, housed in a Department of Evolution and Ecology. The two should be joined at the proverbial hip. Existing ecological communities are freeze-frames from a very long movie. They have not existed for eternity, and many have existed only a few thousand years. There is nothing intrinsically sacred about interspecific associations. *Ecological change is the norm, not the exception*. Species and communities come and go. The ideology (or is it faith?) that informs “restoration ecology” basically seeks to deny evolution and prohibit change. But change will happen in any case, and it is foolish to squander scarce resources in pursuit of what are ideological, not scientific, goals with no practical benefit to anyone and only psychological “benefits” to their adherents.

If that were the only argument, perhaps it could be rebutted effectively. But the proposed wholesale habitat conversion advocated here does serious *harm*, both locally (in terms of community enjoyment of public resources) and globally (in terms of carbon balance—urban forests sequester lots of carbon; artificial grasslands do not). At both levels, wholesale tree removal, except for reasons of public safety, is sheer folly. Aging, decrepit, unstable Monterey Pines and Monterey Cypresses are unquestionably a potential hazard. Removing them for that reason is a very different matter from removing them to actualize someone’s dream of a pristine San Francisco (that probably never existed).

Sociologists and social psychologists talk about the “idealization of the underclass,” the “noble savage” concept, and other terms referring to the guilt-driven self-hatred that infects many members of society. Feeling the moral onus of consumption and luxury, people idolize that which they conceive as pure and untainted. That may be a helpful personal catharsis. It is not a basis for public policy.

Many years ago I co-hosted John Harper, a distinguished British plant ecologist, on his visit to Davis. We took him on a field trip up I-80. On the way up several students began apologizing for the extent to which the Valley and foothill landscapes were dominated by naturalized exotic weeds, mainly Mediterranean annual grasses. Finally Harper couldn’t take it any more. “Why do you insist on treating this as a calamity, rather than a vast evolutionary opportunity?” he asked. Those of us who know the detailed history of vegetation for the past few million years—particularly since the end of Pleistocene glaciation—understand this. “Restoration ecology” is plowing the sea.

Get real.

Sincerely,

Arthur M. Shapiro

Distinguished Professor of Evolution and Ecology



Hull-1



Bill Wycko/CTYPLN/SFGOV

10/31/2011 09:19 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: Dog Park Area closure and reduction in size

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:20 AM -----



Prudence Hull

<prudence.hull@gmail.com>

10/30/2011 06:44 PM

To bill.wycko@sfgov.org

cc civirmail+r.3.316.b6b81b2d82f5431a@sfpeople.net

Subject Dog Park Area closure and reduction in size

Hi Bill Wycko,

I have lived in San Francisco for 35 years, raising three children and four dogs. We have walked thousands of afternoons in Glen Park Canyon, McLaren Park, Bernal Hill, Fort Funston, Ocean Beach and Crissie Fields. I walked with my kids and dogs in the belief that this was a healthy activity for all of us, and I have been rewarded with well-socialized dogs and responsible young adults. I am the mother of a successful San Francisco family.

01

I am dismayed to learn that these dog walking areas are being considered for closure or reduction in size. Why would any urban city seek to discourage the health of its families?

02

I am very dismayed to learn that the city has used Garlon in Glen Park Canyon. Glen Canyon is used by dogs and young children at Glen Ridge Childcare and Silver Tree Day Camp. I have suffered the loss of one dog, at the age of 5 years, from kidney failure. Both my daughters suffered from kidney disease at a young age, although there is no prior history of kidney disease in my family or my husband's family.

03

The NAP environmental impact report makes allegations of dog damages with no substantiating scientific study. Are these the same people who freely approve the use of Garlon in areas heavily used by dogs and small children? I feel this shows a disregard for scientific evidence and study. I feel this shows that this organization is untrustworthy and does not deserve our public support.

Sincerely,  
Prudence Hull

Illig-1



**Bill Wycko/CTYPLN/SFGOV**  
10/31/2011 01:18 PM

To: Jessica Range/CTYPLN/SFGOV@SFGOV  
cc:  
bcc:  
Subject: Fw: NAP EIR comment

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 01:19 PM -----



**Jim Illig**  
<jillig@openhand.org>  
10/31/2011 12:03 PM

To: "bill.wycko@sfgov.org" <bill.wycko@sfgov.org>  
cc:  
Subject: NAP EIR comment

01

I strongly object to the closure of any part of Bernal Hill to off-leash dog recreation. I have owned a home in North Bernal Heights for 17 years and I am up this hill with my dog at least once a day. This hill is a unique urban park that is shared by hundreds of neighbors with and without dogs every day, and the natural areas have not been affected by the recreational use of these SF residents. I disagree with the findings of the EIR regarding this park and I urge the Planning Commission to reject any plans to restrict or close areas to recreational use by residents and their companion animals.

**Jim Illig**  
Project Open Hand  
(415) 447-2426

Ingle-1



**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 04:13 PM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject: Fw: NAE EIR

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 04:13 PM —



**"Kay Ingle"**

**<kingle@berkeley.edu>**

10/31/2011 03:18 PM

To: <bill.wycko@sfgov.org>

cc

Subject: NAE EIR

Dear Mr. Wycko,

I am a dedicated environmentalist and have been a member of Nature Conservancy, Greenpeace, Wilderness Society, and other environmental organizations for many years. Yet I see no reason to ban off leash dog walking in the dog play areas at Lake Merced, McLaren Park, Bernal Hill areas. In the years I have been enjoying these areas with my dogs, I have never seen any problems caused by dogs.

01

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. To deny many people the joy of walking their dogs off leash because of unsubstantiated data is poor administration to say the least.

Kay Ingle

Ingram-1



**Bill Wycko/CTYPLN/SFGOV**

05/16/2012 09:38 AM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject: Fw: NO on NaP

History:

➡ This message has been forwarded.

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 05/16/2012 09:38 AM —



**Terry Ingram**

**<terry.ingram@gmail.com>**

05/16/2012 08:40 AM

To: bill.wycko@sfgov.org

cc

Subject: NO on NaP

Mr. Wycko:

Please reconsider and DO NOT let NAP destroy our parks in a misguided attempt to turn back the evolutionary clock and re-create an idealized "better" environment from a time before European settlers arrived, a time when San Francisco was mostly sand dunes and rocks, with few trees. Our city faces strict prioritization of scarce resources that when allocated to parks should be to keep them safe and accessible, not create fenced-off gardens in the process destroying what we already have. This so-called "wholesale habitat conversion" would require tens of millions of dollars in taxpayer funding and unprecedented broad-scale volunteer hours for modest gains, if any.

Thank you for your consideration.

Cheers,

Terry Ingram

Outer Sunset and daily GG Park user

01

Jake-1



"Krist Jake"  
<krist@redcap.com>  
10/31/2011 02:46 PM

To: <bill.wycko@sfgov.org>, <Jessica.Range@sfgov.org>, <pic@sfgov.org>  
cc: <info@sfdog.org>  
bcc:  
Subject: 2005.1912E - Significant Natural Resource Areas Management Plan (NRAMP)

Dear San Francisco Planning Department,

This email contains comments on Case 2005.1912E. While these comments are generally patterned on those proffered by SFDog.org, I have revised them and, in some cases, extended them. So please read my comments carefully.

I've depended on SFDog.org because, as a typical resident of SF, I don't have time to read and digest 562 page documents (not counting the appendices). However, even without scrutinizing the entire document, by using the "find" functionality of my browser, I discovered nothing in the way of discussion of crime or crime rates that could be related to changes in park designations, and virtually nothing related to financial matters such as budgeting for making changes in the parks or related maintenance.

Since crime and budgets are clearly part of the environment in which parks exist, failure to discuss crime and budgets, it seems to me, are major failings in the EIR.

My detailed comments:

- 01 { 1) The NARMP EIR doesn't offer evidence to support its claims that dogs have an impact on plants and wildlife in natural areas. The NARMP EIR doesn't 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. The NARMP EIR states that dogs MAY be impacting protected plant species or wildlife, but offers no scientific evidence these possible impacts are actually occurring or ever have occurred. In a number of places, the NARMP EIR says that someone's observation is that dogs impact erosion, or cause plant damage, etc., yet the EIR offers no supporting information on these "observations." EIRs should obviously be based on solid, scientific data, not on someone's anecdotal "observations." Further, if there are negative impacts by usage, the NARMP EIR does not differentiate between impacts caused by people with dogs and impacts caused by people without dogs.
- 02 { 2) The NARMP EIR acknowledges that the NARMP plans to close 15% of the DPAs in city parks immediately, when added to the GGNRA's desire to cut off-leash access by 90%, will have a disastrous cumulative impact on remaining off-leash areas in city parks and on recreation - however, the EIR does not analyze what that cumulative impact will be. This is a huge deficiency in the NARMP EIR!
- 03 { 3) The NARMP EIR refers to dogs as "nuisances," an extremely biased position that fails to consider any positive aspects of dog walking, including the physical and mental health benefits to having a dog, which has been rigorously studied and proven.
- 04 { 4) The NARMP EIR does not adequately analyze mitigations should any impacts from dogs be proven other than closing the DPA, even though less draconian measures could be developed.
- 05 { 5) The NARMP 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 NARMP EIR never considers the impact on the character of the community of people who walk with their dogs in the DPAs and portions of DPAs that NARMP wants to close. In many cases, this

Jake-1

05  
(Cont.)

community of humans and dogs and their interactions, defines the "existing character" of the park. Dog walkers are perhaps the most diverse group of park users. To explain, 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. 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 NARMP EIR did not consider these impacts on community of those who live near and walk in parks, it is inadequate.

06

6) More generally, the NARMP EIR does not adequately consider the impacts on the social fabric (environment) of San Francisco if one-quarter of its city parklands are closed to residents. Since the term "crime" is not found in the EIR, it evidently does not consider the effects of closing parks on changes in the park usage including more usage for criminal behavior such as drugs, camping out, and crimes against other citizens.

07

7) The NARMP EIR does not adequately analyze the impacts on recreation of NARMP plans to plant sensitive plant species (those that are listed as either endangered or threatened) throughout its natural areas.

08

8) Where NARMP controls the entire park, the NARMP EIR does not adequately consider impacts on the specifics of recreation and land use. No other recreational use is possible in those parks. In an additional 10 parks, NARMP 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 NARMP. A majority of land under NARMP 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 NARMP EIR must consider this large-scale denial of access when analyzing the Project Alternative.

09

9) The NARMP EIR does not adequately consider the negative impacts on aesthetics and land use of poor maintenance in natural areas. As a search in the entire EIR for relevant words (finance, financial, budget) provides only a few results, it is evident there is no rigorous financial analysis of anything. This failure to consider costs of usage changes can lead to serious adverse environmental impacts.

10

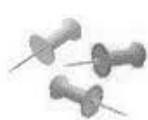
10) The NARMP plans call for cutting down almost 20,000 trees because they are not native does not adequately consider the long-term impacts on climate change, global warming, and the quality of fresh air in San Francisco. It would be costly and, simply, dumb. Open up your eyes! There are a lot of non-native inhabitants everywhere you look – in the Bay, on land, and in the air. Get used to it!

11

11) The NARMP 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 NARMP plan is trying to re-create.

Krist Jake  
(415)385-0100

Johns-1

**Bill Wycko/CTYPLN/SFGOV**

05/16/2012 09:38 AM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject: Fw: NAP

History:

This message has been forwarded.

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 05/16/2012 09:39 AM —

**Belinda Johns**

&lt;belindajohns1@gmail.com&gt;

05/16/2012 08:11 AM

To: bill.wycko@sfgov.org

cc

Subject: NAP

01 I live on Mt. Davidson and absolutely oppose the plan to deforest the mountain (as well as other  
 02 forests in SF). The only notice I received of this plan was from my local community  
 association. And that was only 4 weeks ago. Where was the public notice of this plan  
 published?

The plan is appalling and absolutely defies reason. I have talked to someone who works in  
 Golden Gate Park and received more details, and have also read a report that concludes the  
 argument in favor of the plan is specious.

04 But here are my primary concerns: 1. toxic spraying to assure these "non-native" plants and  
 trees don't regrow - really? How does that improve an environment that is already suffering  
 from a shortage of bees and birds because of environmental poisons? 2. And has anyone studied  
 the habitat issues? What happens to our hawks, turkey buzzards, and other birds that rely on that  
 forest for life? And what happens to the coyotes, skunks, raccoons, and other animals that rely on  
 05 that forest for life? 3. And what about the risk of land/mud/rockslide after the trees are  
 removed? 4. And what about the climate change it will cause? Whole neighborhoods are  
 06 buffered from the wind from the west because of the forests.

07 If toxic spraying is part of the plan, has the city notified the state and federal EPA?

08 I would also like to know where the \$\$ is going to come from. The Parks budget is already  
 stretched and our parks are suffering as a result. So the city wants to divert more funds from that  
 budget to rip out "non-native" flora? Honestly, this "non-native" flora has been here for over  
 100 years - I am really not sure it's so "non-native" now and it is a great improvement over sand  
 dunes. Does the NAP extend to ripping out everything in Golden Gate Park as well and turning  
 that beautiful stretch of land back into its "native" state? That would be sand dunes again.

I will do everything I can to defeat this plan.

Belinda Johns

Johnson-1



**Bill Wycko/CTYPLN/SFGOV**  
10/31/2011 09:13 AM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject: Fw: public comment on dog play areas

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:13 AM -----



**Mandy Johnson**  
<mandy\_johnson16@hotmail.com>  
10/31/2011 07:00 AM

To: <bill.wycko@sfgov.org>

cc: Scott Bradley <scotty27@hotmail.com>, Tom Tillinghast <ttilli7558@aol.com>

Subject: public comment on dog play areas

Dear Mr. Wycko,

01 { I am writing to express my alarm that the SF Recreation and Parks Department may eliminate large swaths of off-leash dog play areas in city parks. I am particularly alarmed at plans to restrict off-leash activity in Bernal Hill Park -- a beautiful space that I have lived next to and used daily for 12 years.

When my husband and I bought our home in Bernal Heights in 1999, we did not yet have children or dogs -- but we saw proximity to the park as a major benefit to moving here. We started taking nightly walks in the park after work, meeting our neighbors -- many of whom were accompanied by cheerful canine companions -- and becoming part of the community. Before long, we were going to the park twice a day with a dog of our own ... and then with our daughter, too. In over a decade of walking the park, we have not gotten bored of the sweeping vistas, the funky little single-track trails, and the people and dogs we meet there every day. Walking our dog in the park is not just good exercise and socialization for him, it is good exercise and socialization for my husband, our 9-year old daughter, and me -- and it will be for the new baby boy we're expecting in late November.

What strikes me most about the proposal to restrict dog play areas is the pointless destructiveness of it. By any measure, Bernal Hill Park is a terrific success story. Despite the fact RPD has next to no presence in the park (in 12 years, I have literally never seen an RPD employee there. Never. Not once.), it is clean, safe, and widely used by a variety of people. On any given walk, at nearly any time of day, I see families with children, families with dogs, families (like mine) with both, runners, hikers, hipsters, and -- in the past 2 years or so -- tourists and sightseers. All of us enjoying the park together, striking up interesting conversations, and looking out for one another. It is a wonderful, community park; it embodies so much of what I love about San Francisco in general, and about Bernal Heights in particular. Bernal Hill Park, as it is today, is a shining example of a public amenity that really works. Why on earth would RPD want to destroy that?

01 (Cont.) { Bernal Hill Park without off-leash dog areas will lose most of the "eyes and ears" the dog-walking community provides -- the eyes and ears that keep it a safe and clean place for recreation. What is now a vibrant park could very well turn into a meeting spot for vandals, petty hoodlums, and homeless encampments. That sounds speculative on my part, I suppose ... but, then again, that's pretty much what the park turns into on 4th of July, when the dog people are pushed out and the partiers move in. My family and I spend the week following the holiday cleaning up broken beer bottles, old fireworks, and piles of trash left behind by the revellers. My speculation is, at least, grounded in actual experience as a park user. The unsubstantiated arguments presented in the EIR about how dogs "may" impact plants and



Johnson-1

wildlife strike me as far more speculative.

01  
(Cont.)

There are many people more qualified than me to speak to the science (or lack thereof) behind the EIR. I am an active environmentalist and outdoor enthusiast, but I am not a scientist. I am, however, a successful businessperson, and I can speak to the wrongheadedness of the proposed off-leash dog restrictions from a business perspective. Because my daughter attends RPD summer programs, I am on an email list that regularly updates me on RPD issues -- particularly, the draconian budget cuts the department has had to endure the last few years. The emails have communicated, time and again, the severe funding restrictions within which RPD is forced to operate, and the painful budgetary choices its management must make. Why on earth, in these constrained budgetary times, would RPD divert resources from its other critical programming to implement unpopular, unwanted restrictions on off-leash dog recreation? I object to the policy of restricting dog play areas, on the merits, regardless of RPD's fiscal situation. But when I consider the opportunity costs involved in RPD taking this on, I am truly shocked. What programs will RPD sacrifice in order to ruin Bernal Hill Park for me and my family, and thousands of other law-abiding recreational users?

02

As a dog owner, I honestly feel under siege. Between RPD's desire to put plants above people and GGNRA's desire to virtually eliminate dog recreation from its parkland in 3 counties, I am beginning to wonder why we dog owners seem to have a bullseye painted on our backs. Is the future of San Francisco dog ownership going to be confined to depressing outings to tiny, concrete dog runs or covert, illegal trips to open space? Will my family lose one of the amenities we most treasure about city living? I have no idea why RPD would want to make the city less friendly to families and less friendly to recreation. But if the department chooses to go down this path, I pledge my unrelenting opposition, every step of the way. I'm not giving up Bernal Hill Park without a fight.

regards,  
Amanda Johnson  
164 Bonview St.  
San Francisco, CA 94110

Johnston-1

**RECEIVED**

**JUN 08 2012**

Carolyn Johnston  
106 Dorchester Way  
San Francisco, CA 94127

**CITY & COUNTY OF S.F.**  
PLANNING DEPARTMENT  
PAC A

June 7, 2012

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

Re: Draft EIR, Natural Areas Program

Dear Mr. Wycko,

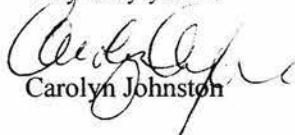
I have lived near Mount Davidson since 1986. My husband and I chose to move to this neighborhood largely because of Mount Davidson. It towers over the neighborhood, and its tall trees make the entire area look greener and lovelier. We love the fact that there is a green mountain visible from our home, our yard, our street, and as we're walking home after taking MUNI home from work.

Mount Davidson's proximity to us is also important because we are avid hikers. We go to Mount Davidson very often – with our dog, our children, extended family, and out of town guests. It is the only place we can hike in the woods that is within walking distance of our house. Once we walk up the stairs, we can forget we are in the city and enjoy the experience of being in the woods – birds chirping, no sound of cars, and no view of civilization. It's also a nice place to go on a windy day because the trees help block the wind. Because we go to Mount Davidson so much, we drive less and are in better shape.

We are horrified by the proposal to remove healthy trees on Mount Davidson. It would make views of the mountain substantially uglier, and would significantly worsen the recreational use of the mountain. I would not enjoy hiking up there if I didn't get the experience of being in a dense forest.

The DEIR is misleading because it does not acknowledge that the impact of removing 1600 of Mount Davidson's trees on recreation and aesthetics would be significant and adverse.

Very truly yours,

  
Carolyn Johnston

01

Joyce-1

**From:** Bill Wycko  
**To:** Jessica Range  
**Subject:** Fw: close the Dog Park Area's  
**Date:** 10/04/2011 10:26 AM

---

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/04/2011 10:26 AM -----

**ann joyce**  
**<annjoycesf@hotmail.com>** To <bill.wycko@sfgov.org>  
cc  
10/04/2011 10:24 AM Subject close the Dog Park Area's

I have a dog but never go to these parks because of the people who bring their dogs to the parks. The dog walkers who bring in a brood of 15 dogs and don't watch them are the worst offenders. Close these parks and they will be forced to actually WALK their dogs!

01 { Please consider at least closing the un-fenced dog run areas. Both myself and my dog have been attacked when walking near a dog run area and the owners don't have control over their dogs - or worse, as in my case - the owners don't care if their dog attacks someone.

Thank you - I am a San Francisco Homeowner who pays taxes and votes.

Ann Joyce

Jungreis-1



Bill Wycko/CTYPLN/SFGOV

10/31/2011 04:13 PM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject: Fw: Opposition to "reversion" element of Natural Resource Areas Management Plan

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 04:14 PM -----



Jason Jungreis

&lt;jasonjungreis@gmail.com&gt;

10/31/2011 03:08 PM

To: bill.wycko@sfgov.org

cc

Subject: Opposition to "reversion" element of Natural Resource Areas Management Plan

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.
- 03 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?
- 04 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.
- 05 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.
- 06 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.
- 07 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.
- 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,

Jason Jungreis  
527 47th Avenue  
San Francisco, CA 94121  
415-750-0830

Kalafati-1



**Bill Wycko/CTYPLN/SFGOV**  
06/20/2012 10:15 AM

To: Jessica Range/CTYPLN/SFGOV@SFGOV  
cc:  
bcc:  
Subject: Fw: Draft impact Report for Natural Areas Management Plan

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 06/20/2012 10:15 AM —



**"Anton Kalafati"**  
**<akalafati@bsideconstruction.com>**  
06/19/2012 07:30 PM

To: <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 Lee" <mayoredwinlee@sfgov.org>, "Scott Wiener" <scott.wiener@sfgov.org>  
Subject: Draft impact Report for Natural Areas Management Plan

Dear Mr. Wycko,

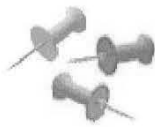
01 { I'm opposed to this any plan that involves cutting down health tree's I that a maintenance plan  
02 { should be the only good alternative.

Anton Kalafati  
President



B-Side Inc  
1940 Union st #9  
Oakland CA 94607  
Cell:415-699-1469  
Office:510-451-7527  
Fax:510-451-7517  
www.bsideconstruction.com

Karpa-1



**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 09:22 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: Please preserve off-leash use

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:23 AM -----



**"Michael Karpa"**

**<mskarpa@comcast.net>**

10/30/2011 08:11 AM

To <Bill.wycko@sfgov.org>

cc

Subject Please preserve off-leash use

01 [ My off-leash times with my dog are virtually the only times I ever use the GGNRA. Please let us keep the R in GGNRA.

Mike Karpa  
San Francisco

Kass-1

*Sidney Kass*

25 Vista Verde Court, San Francisco CA 94131

415-333-9372

*sidkass@hotmail.com*

RECEIVED

June 2, 2012

Bill Wycko  
Planning Department

JUN 07 2012  
CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
M E A

Sir:

I urge you to follow the plan to thin out or remove many of the eucalyptus trees on Mt. Davidson.

I live within walking distance of Mt Davidson, and often walk in the open spaces. Only rarely do I venture into the eucalyptus forest because it is so messy and dangerous underfoot.

I would like to see open areas populated by native annuals, perennials, bushes, trees or even grasses.

I fear that the neighbors are misled into expecting dire results from your undoing of the past error of planting a "productive" eucalyptus forest.

Thank you.

Sincerely



Kathie-1

**From:** Bill Wycko  
**To:** Jessica Range  
**Subject:** Fw: draft EIR Significant Natural Resource Areas Mgmt Plan  
**Date:** 10/04/2011 02:32 PM

---

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/04/2011 02:32 PM -----

**Kathie**  
**<fogcitykathie@yahoo.com>**

To "bill.wycko@sfgov.org" <bill.wycko@sfgov.org>  
cc

10/04/2011 02:31 PM

Subject draft EIR Significant Natural Resource Areas  
Mgmt Plan

Please respond to  
Kathie <fogcitykathie@yahoo.com>

01

I enthusiastically support limiting access of dogs in Natural Resource Areas so that these areas can be enjoyed by people who do not want dogs and dog mess all over their parks. Thank you.



Keating-1

**JOHN B. KEATING**  
ATTORNEY AT LAW  
POST OFFICE BOX 620622  
2995 WOODSIDE ROAD, SUITE 350  
WOODSIDE, CALIFORNIA 94062  
E-MAIL: JBKEATING@AOL.COM  
FACSIMILE (650) 851-5912  
(650) 851-5900

October 31, 2011

VIA E-MAIL: bill.wycko@sfgov.org

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

Re: Natural Areas Program Public Comment

Dear Mr. Wycko:

I am a San Francisco native and long time resident and have followed the natural areas program development issues for about a decade now.

01

I am opposed to any expansion of the designated natural areas to the extent resulting in restriction of the types of public recreational access to the particular public park areas. Our City parks are a treasured resource adding greatly to the quality of life and well being of the citizenry. As such, any proposal likely to result in restriction of full access of the people to the parks should be reviewed with greatly heightened scrutiny and suspicion.

02

While development of native plant areas does seem generally laudable at first blush, such efforts are inappropriate for a municipal park if the result is fencing the people out of their parks.

03

The plan seems to confuse "native plant" restoration with "natural areas." Some areas have a current natural condition of a reasonable adaptive ecological system even if deviating from the identified preferred "native" plant base. I am concerned about short term negative impact to the current bird population as a result of the destruction required to convert the areas to the identified preferred native plant habitat. In particular, please take note of the loss of the great blue heron nesting areas caused by prior native plant area clear cutting.

Moreover, I think you should take a close look at the question of whether the staff DEIS report reflects a bias in that it appears based on a series of assumptions all of which favor the natural areas program, rather than a balanced approach where some assumptions end up favoring the program and other assumptions end up favoring recreational access. The DEIS should be a careful balanced analysis rather than an advocacy piece to justify a particular conclusion.

Sincerely,

John B. Keating

Keats-1



**Bill Wycko/CTYPLN/SFGOV**  
10/31/2011 04:16 PM

To Jessica Range/CTYPLN/SFGOV@sfgov

cc

bcc

Subject Fw: Dog play areas in San Francisco - Citizen's statement

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 04:16 PM -----



**Carma Keats**  
<carma.keats@gmail.com>  
10/31/2011 02:17 PM

To Bill.Wycko@sfgov.org

cc

Subject Dog play areas in San Francisco - Citizen's statement

Although I will fight passionately (for the rest of my life, if necessary) for San Franciscans with dogs to have access to sufficient off leash play areas, in a way I can see a positive outcome if plans to restrict more areas to dogs are successful.

It might become the tipping point to create an enormous backlash against the City and City planners who seem to simply disregard the large percentage of homes where families, couples or individuals consider dogs not to be "nuisances" but, rather, members of the family. There are 160,000 dog family members in the City; more dogs than human children - and each dog may represent two or more voters.

01

Ten times the space allotted to dog play is already restricted for people with dogs; in other words, we have use of one-tenth the space. If you dare to take even more space away, people with dogs may rise up to demand true representation of our actual real demographics by City employees rather than tolerating the way some City employees seem to represent only the interests of a small minority who unrealistically want to simulate wilderness in the middle of a major urban center at the expense of local people and their dogs.

In a way, a backlash could even parallel the Occupy movement ... acting out of sheer practicality and need, I believe people might simply stop heeding City Planning or other guidelines and just occupy City parks with their dogs.

It seems to me that City planning ought to consider the actual, real life situation and demographics in the City rather than attempting to impose an imaginary City through plans for a City that does not now, and will never, exist in reality.

In my small corner of town, Dogpatch, I have 360 or more email addresses through which I contact dog families; you may have received emails already from many of them although the timing is unfortunate with so many people busy for Halloween. Nevertheless, each of these email addresses represent one or two (or even three) San Franciscans that may take further steps to demand true representation of our actual needs in the future or may simply occupy the City parks we love so much.

Keats-1

01 [ Although many of us pay taxes for public schools and do not begrudge a penny of it, all we need  
(Cont.) is open space for people and our canine family members. Our neighbor, Mayoral candidate  
Dennis Herrera, understands this need, and we thank him for his understanding and support.

Mr. Wycko, I also thank you in the hope that you will develop realistic consideration of our  
common future in San Francisco.

Carma Keats  
Dogpatch Dogs

Keitelman-1

HPC meeting on 9-21-11  
 2005.1912E  
 (J. RANGE)

#### PRESERVING HISTORY, OR MAKING IT?

Next Monday, Pacifica's planning commission may make one of the Bay Area's most underused and environmentally harmful golf courses an historic landmark. But rather than preserving history, the commission may be making it: never before has Pacifica landmarked a property without first conducting a professional historical resource assessment and without the landowners consent. If it does so now, Pacifica would set a precedent for abusing the historic preservation law, and ultimately undermine it. Here's why.

Sharp Park Golf Course, owned and operated by San Francisco but located in Pacifica, is beset by numerous problems. So San Francisco recently started a planning process to reconsider the future of Sharp Park and provide a different suite of recreational amenities that would be more environmentally and financially sustainable.

But golf advocates are trying to do an end-run around this planning process, claiming Sharp Park should be landmarked because Alister MacKenzie designed it. But history is not on their side.

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.

01

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 a massive coastal storm surge, no longer held at bay by the natural barrier MacKenzie destroyed, inundated the course and severely damaged several 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 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 MacKenzie designed. 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.

Currently San Francisco attempts to prevent the freshwater flooding of the golf course by pumping water through the levee, but this is killing the threatened California red-legged frog—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 endangered San Francisco garter snake—considered the most beautiful serpent in North America—as mowing operations kill the snakes while they bask in the sun on the course's fairways. The United States Fish and Wildlife Service warned San Francisco in 2005 to stop

Keitelman-1

01  
(Cont.)

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.

Consequently, there is simply no MacKenzie legacy at Sharp Park today. A San Francisco golf program employee wrote a history of San Francisco golf in 1978 and explained 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. The golf advocates' end-run would ensure that these histories 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.

02

Moreover, in 2004 a survey of San Franciscans 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.

This is why residents of both Pacifica and San Francisco have come together to urge San Francisco to consider recreation alternatives at Sharp Park. Because this review is ongoing, San Francisco has not consented to the end-run proposed by golf advocates in Pacifica.

If Pacifica nonetheless landmarks Sharp Park without a factual basis for doing so, it will enable future abuse of the preservation ordinance, and improvements to all our community spaces could be beset with unjustified delay and expense. Pacifica must at a minimum conduct a professional historic resource assessment and work with the landowner before it takes such precedent-setting action.

Better yet, the planning commission can save funds, its reputation, and the landmark ordinance by accepting the hard facts: Sharp Park is no longer a genuine MacKenzie golf course nor is it a viable economic concern for the city of San Francisco.

Chris Carlsson, Director, FoundSF.org, a living archive of San Francisco history  
Lawrence Cuevas, Landscape Architect  
Derek Hoye, Golfer Against Sharp Park  
Brent Plater, Director, Restore Sharp Park, [www.restoresharpark.org](http://www.restoresharpark.org)  
Isabel Wade, Neighborhood Parks Advocate

*copy of a letter to editor - ~2010 when Pacifica attempted and abandoned  
preserved 9/21/2011 by Mary Keitelman making Sharp Park a historic resource  
Pacifica, CA  
mkeitelman@hotmail.com*

Kelly-1



**Bill Wycko/CTYPLN/SFGOV**  
10/31/2011 11:43 AM

To: Jessica Range/CTYPLN/SFGOV@SFGOV  
cc  
bcc  
Subject: Fw: Off Lease Dog Space/EIR for NAP....

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 11:44 AM -----



**Kimberly Kelly**  
<kimberly\_kelly@hotmail.com>  
>  
10/31/2011 11:07 AM

To: <bill.wycko@sfgov.org>  
cc  
Subject: Off Lease Dog Space/EIR for NAP....

Dear Mr. Wycko-

I am a home owner and dog owner in San Francisco. I purposefully bought in Bernal Heights, because it was within walking distance from an off leash dog area (Bernal Hill). My dog Sammy & I walk there almost every day, and have for the last 8 years. Additionally, we often play at Crissy Field & at Fort Funston, or hike the Land's End Trail. I am also a member of the (newly consolidated/reorganized) San Francisco Parks Alliance.

In most areas where we play, users with dogs and users without dogs interact quite harmoniously and respectfully, sometimes informally dividing the space (e.g. at Crissy Field, dogs are generally northwest of the jetty/bridge, beachgoers with kids go on the SE side) and it works quite well. In Bernal, dog owners often get together to physically care for the hill—picking up garbage, watching out for misuse, working with vetted organizations to weed/restore native plants, etc.

I am concerned about the potential loss of off-leash space. Preserving park space is well-intentioned, but I personally believe that preserving the space means preserving it for use—mostly by the people who live in the area (vs. for native plants that have long disappeared—what's next: are we going to return Golden Gate park into Sand Dunes?).

I have a well-behaved and happy dog because he gets plenty of exercise--on leash exercise would not be enough for my retriever. And, I am a happy and engaged citizen of my community in big part because of my dog.

Here are some of my specific concerns:

01

- 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."

Kelly-1

- 01 (Cont.) { 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 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.
- 03 { • 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.
- 04 { • 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 { • The NAP 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. The NAP EIR assumes all DPAs are interchangeable. They are not. This must be corrected.
- 06 { • The NAP EIR does not adequately analyze mitigations short of closing DPAs if any impacts can be proven.
- 07 { • The NAP EIR does not adequately consider the long-term impacts on climate change and global warming that will result from changing areas with non-native trees into native grasslands. Trees are much better at sequestering carbon than grasslands are, and the long-term impact of cutting down trees and replacing them with grasslands must be considered.
- 08 { • The NAP EIR does not adequately consider the fact that the climate in SF has changed (and continues to change) from the time several hundred years ago that the NAP plan is trying to re-create. Native plants suitable to the earlier climate may no longer be suited to today's (or tomorrow's) climate. The environmental consequences of trying to force the old habitat into today's (and tomorrow's) climate, e.g., increased need for herbicides, should be analyzed more thoroughly.

Thank you for considering my comments.

Kimberly Kelly-->Consulting  
Finance, Accounting & Project Management  
415-279-9231

Kenealy-1

**Bock, John**

---

**From:** Jessica.Range@sfgov.org  
**Sent:** Tuesday, November 01, 2011 3:47 PM  
**To:** Bock, John  
**Attachments:** 111031 GGAS SNRAMP DEIR Comments\_final\_1.pdf; SNRAMP DEIR Comments.doc; CBD comments on Natural Areas 10-31-11.pdf; NAP EIR - Belgrave neighbors - D. Lapins.doc; CBD comments on Natural Areas 10-31-11.pdf; NAP letter.pdf; Notes from FWS meeting.pdf; Final WEI coments on DEIR.pdf; NAP\_EIR\_2011.pdf

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 03:47 PM -----

Bill  
Wycko/CTYPLN/SFGO  
V  
To  
Jessica Range/CTYPLN/SFGOV@SFGOV  
11/01/2011 03:21 PM  
cc  
Subject  
Fw: Let dogs run a bit in San Francisco

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 11/01/2011 03:21 PM -----

Pat Kenealy  
<pkenealy1@yahoo.com>  
To  
bill.wycko@sfgov.org  
10/31/2011 11:10 PM  
cc  
Subject  
Let dogs run a bit in San Francisco



Kenealy-1

Bill Wycko, Environmental Review Officer  
SF Planning Dept.

1650 Mission St., Suite 400

San Francisco, CA 94103

Dear Mr. Wycko,

01

Please do what you can to preserve or expand off-leash dog walking space in San Francisco parks.

I don't own a dog, but my children and I like seeing dogs roaming freely in our parks and support the rights of our dog-owning neighbors to enjoy our parks while letting dogs be dogs.

Let's not make more rules in this City, let's live and let live.

Sincerely,

Kenealy-1

Patrick Kenealy

2464 Broadway

San Francisco, CA 94115

----- Forwarded by Jessica Range/CTYPLN/SFGOV on 11/01/2011 03:47 PM -----

Bill  
Wycko/CTYPLN/SFGO  
V To  
Jessica Range/CTYPLN/SFGOV@SFGOV  
11/01/2011 03:21 cc  
PM  
Subject  
Fw: SF Natural Areas Plan

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 11/01/2011 03:22 PM -----

celeste langille  
<cclangille@earth  
link.net> To  
"bill.wycko@sfgov.org"  
10/31/2011 11:09 <bill.wycko@sfgov.org>  
PM cc  
Subject  
SF Natural Areas Plan

Dear Mr. Wycko,  
I am writing to advocate that the maximum restoration alternative must

Kesel-1

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



Re: DEIR on Significant Natural Resource Areas Management Plan

Mr. Bill Wycko,

01 { My comments pertain to the DEIR for the Natural Areas Management Plan (SNRAMP). The DEIR for SNRAMP is an accurate, adequate, and complete review of the plan. It considers a range of potential impacts to City resources and proposes mitigations where possible. This DIER is based on sound science and expert opinions. The DEIR is consistent with the City's Sustainability Plan as well as other directives. Furthermore, the DIER addresses potential impacts for natural and recreational amenities in San Francisco's Natural Areas.

02 { SNRAMP is an innovative plan that will protect San Francisco's natural resources. Implementation of the plan will help safeguard local plants and animals by providing clear direction management priorities. This is the most cost effective method for managing San Francisco's natural resources.

Thank you

Rachel Kesel

A handwritten signature in black ink, appearing to read "Rachel Kesel", written over a horizontal line.

99 Ellsworth St  
San Francisco

Kessler-1

October 24, 2011

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

**RECEIVED**  
**OCT 26 2011**  
**CITY & COUNTY OF S.F.**  
 PLANNING DEPARTMENT  
 M.E.A.

Subject: Public Comment on Draft Environmental Impact Report for Natural Areas Management Plan

Dear Mr. Wycko,

I am a resident of San Francisco, and am keenly interested in its wildlife, truly natural areas, and habitat. My prime occupation is taking photographs and studying the behavior of our urban wildlife here in San Francisco -- I spend three or more hours daily doing this. I have had exhibits at The Seed Gallery of The Tides Foundation in the Presidio, at the Josephine Randall Junior Museum, and at the main branch of the San Francisco Public Library. I have written articles and self-published a booklet to inspire acceptance of our coyotes and wildlife. I am specifically interested in our wildlife which is not protected because it is not on any "endangered" lists -- these are the animals I photograph.

- 01 { The current Draft Environmental Report appears to be slanted toward "Native Plant" management, at the expense of other interests.

The removal of so called "invasive" plants destroys habitat.

- 02 { 1. The report repeatedly mentions "invasive trees", usually in reference to eucalyptus. This tree has not been shown to be invasive. The trees that are here were planted, many of them a century or more ago. The main issue appears to be that they are occupying land that Native Plant advocates want to convert to Native Plant areas.

- 03 { 2. The trees, as well as other plants targeted for removal (including blackberry brambles and vines) form valuable habitat for birds, animals and insects. By focusing on a handful of species, the needs of all the others are neglected. The areas of Native Plants do not appear to be superior habitat in general. With a few exceptions, they do not provide the cover or the food resources birds and animals need. Thousands of eucalyptus trees and thousands of cubic feet of bushy habitat are being destroyed.

- 04 { Strong toxic pesticides are increasingly necessary.  
 3. Because Native Plants are no longer suited to this eco-system -- and because of the need for NAP to stop Natural Succession, when different plants in turn dominate a particular area -- the "Natural" Areas Program requires a great deal more pesticides than would be needed if

Kessler-1

04  
(Cont.)

these areas were truly natural. The Report underplays both the amounts and the toxicity of the pesticides that will be used. In fact, it does not even say how much will be used.

4. Garlon (triclopyr), Roundup (glyphosate), and Imazapyr are mentioned as the most likely chemicals to be used. Garlon is a Tier I (Most Hazardous) chemical. Roundup and Imazapyr are Tier II. No Tier III herbicides are even mentioned.

5. The report contains errors that minimize the impact of these chemicals.

05

- On p 365, it says Garlon degrades quickly and has low toxicity to aquatic species. However, the Material Safety Data Sheet (MSDS) ([http://www.fs.fed.us/r5/eldorado/documents/freds/WEB%20Only/garlon\\_4\\_msd\\_s\\_rev\\_030909.pdf](http://www.fs.fed.us/r5/eldorado/documents/freds/WEB%20Only/garlon_4_msd_s_rev_030909.pdf)) says "Material is highly toxic to aquatic organisms" and also that it is "slightly toxic to birds." The MSDS also says the material is "expected to biodegrade only very slowly in the environment" and "Fails to pass OECD/EEC tests" (for ready biodegradability). The report says Garlon is being phased out; but if the NAP's tree-felling program goes through, a lot more will need to be used to prevent resprouting since it is the only herbicide known to prevent the resprouts of eucalypts.

06

- Imazapyr – which was approved for NAP's use in 2011 – is not approved for use in Europe. It moves readily in the soil, and is excreted by some plants through their root systems. It does not biodegrade quickly. Its end-product, quinolic acid, is a neurotoxin. The report does not mention these issues where it mentions using Imazapyr.

07

- Roundup (glyphosate) is the second most commonly used chemical in NAP (used 31 times in 2010 compared to Garlon's having been used 36 times). This has been linked to birth defects (including brain damage and neural tube damage) in humans and in animals. (Glyphosate-Based Herbicides Produce Teratogenic Effects on Vertebrates by Impairing Retinoic Acid Signaling; Carrasco et al. <http://pubs.acs.org/doi/abs/10.1021/tx1001749>) It is also highly lethal to amphibians, according to a University of Pittsburgh study. This is a concern because many of the areas where it is used have water nearby. Glen Canyon, for instance, has a stream running through it. Roundup is also associated with changes to the soil and fungal root disease. <http://www.reuters.com/article/2011/08/12/us-glyphosate-idUSTRE77B58A20110812>

08

- The main argument used by the Draft EIR to justify the use of pesticides in the natural areas is that NAP is following the rules, that therefore by definition there is no environmental impact from its use. (This reminds me of a recent US Supreme Court decision in which patients harmed by medical devices are now prohibited from suing the manufacturers of those devices if they were approved by the FDA.) There are two reasons why this argument is not an adequate defense: (1) NAP's uses of both Garlon and Imazapyr have been granted by exception by the Department of the Environment and they are not used by other agencies in the city. (2) NAP does not always follow

Kessler-1

08  
(Cont.) { the rules, such as posting a date of the application of the pesticide as required by policy.

04  
(Cont.) { The report says that only 10% of SF RPD's pesticide use is in Natural Areas, which are 25% of the total area. However, certain places, such as sports fields and golf courses, use a disproportionate amount of herbicides. If the natural areas were truly natural, they would need no herbicides at all. The SFNAP should use no Tier II or Tier I herbicides.

NAP was originally intended to preserve the few remnants of San Francisco's historical habitat, but the program has morphed into an empire that controls over one-quarter of all the city-managed parkland -- land for which access is being limited by the NAP program in a city coping with more and more people. We have wonderful natural areas -- forests, thickets and overgrown areas, which everyone loves as they are -- they are truly natural -- but they are being removed for NAP's program.

09 NAP is actually harming the environment by destroying trees, established habitat, and established ecosystems which include our existing wildlife. NAP wants to recreate our environment as one of native grasses which might have existed in the area in 1776 -- in very delimited spaces this seems fine, but they should not be taking over our parks which have evolved on all levels since that time. The grasses were native to a sand-dune ecology, but that is no longer the case within the city, and the grasses provide no protective habitat to the animals which now occupy these spaces -- animals which are not on NAP's "specified" or "endangered" lists. There has been an alarmingly high rate of failure when "endangered" species have been introduced -- this is because they are no longer suited to this environment which has evolved and changed since 1776. NAP is a political program, not a program based on science, and one which is hampering people's enjoyment and use of their parks.

10 { And what about birds, raptors and furry animal life that are not on the endangered lists -- wildlife which already lives in these areas now? There is no mention of these in the EIR. To  
11 { put in their grasses, NAP is destroying healthy trees -- trees which, besides offering animal habitat, collect moisture from the fog, offer shade, serve as wind barriers, supply beauty and psychological relief. The trees are part of ecosystems which were established over 100 years ago. They are a part of a balanced, healthy animal habitat. What ever happened to saving the trees?

09  
(Cont.) { We have now discovered that, for native plants, there is a huge issue of "sustainability" which has been totally overlooked by the NAP program: the Native Plants in fact cannot survive without artificial means of keeping them going, including huge amounts of human management and poisons to keep other growth down: this project is an absolute waste of resources. And the result is artificial museum gardens which preclude other uses of the parks -- access to more and more areas is being restricted because of the NAP program. The very phrase "natural areas" is totally deceptive to the public -- these are artificial creations.

Kessler-1

09  
(Cont.)

If you want to look at some areas which have been left totally bare because NAP ripped out what was there, look at the periphery of Pine Lake -- the NAP program first began there 15 years ago and it is a mess. And now the lush growth in Glen Canyon is slowly and systematically being removed, NAP is turning a gem of a wilderness park -- something that everyone wants retained -- into a native grassland area, even removing and thinning truly-native willows and coyote brush. No one wants these parks turned into these artificial museum gardens except the NAP people themselves and their recruited volunteers. Twin Peaks is sprayed with poisons every four months so that native plants can grow. More people that I speak to want to end the NAP domination of our so-called "natural areas."

12  
13  
14  
15

For all these reasons, the Proposed Project as well as the "Maximum Restoration Alternative" are bad for wildlife, habitat and environment. The "Maintenance Alternative", as stated in the Draft Environmental Impact Report on page 526, states that this is the Environmentally Superior Alternative because it has the least negative impact on the environment of all alternatives. Of these alternatives, I am advocating the "Maintenance Alternative." However, I and many others would like to see the NAP program actually cut back. Page 2 of your summary needs to be corrected to reflect what page 526 of the Draft says: that the "Environmentally Superior Alternative" is the "Maintenance Alternative."

Please let's preserve nature -- true nature and wildlife -- not these artificially created museum gardens for which NAP is destroying the forests, thickets and underbrush we have, that are non-sustainable needing constant human intervention and poisons, that are limiting access to those of us who use the parks.

Sincerely,



Janet Kessler  
636 Douglass Street  
San Francisco, CA 94114  
jannyck@aol.com  
[www.urbanwildness.com](http://www.urbanwildness.com)  
[www.coyotevipps.com](http://www.coyotevipps.com)

Enclosed: All of these photos were taken in San Francisco parks and open spaces -- this is the so-called "invasive" and "non-native" habitat used by our existing wildlife. This habitat is being removed for native grasses. These animals are not listed in the EIR report.



Kessler-1

All of these photos were taken in San Francisco parks and open spaces — **these show** the so-called “invasive” and “non-native” habitat used by our existing wildlife. This habitat: trees, thickets and dense undergrowth, is being removed for native grasses. These animals are not listed in the EIR report -- **why aren't they?**



Red-winged Blackbird in non-native Cherry tree



Honeybee hive in non-native Eucalyptus



Kessler-1



Honeybee works in non-native wild mustard



Great Blue Heron family in non-native Monterey Pine



Nuthatch feeds and nests in non-native Eucalyptus

Kessler-1



Great Horned Owlets born and raised in non-native Eucalyptus



Black-headed Grosbeak in non-native Eucalyptus



Honeybee finds pollen in non-native wild radish

Kessler-1



Red-tailed Hawk finds mouse in non-native Iceplant



Gopher lives in non-native grasses



Baby Red-tail Hawks in their non-native Eucalyptus tree nest

Kessler-1



Night Heron hunts in non-native Scotch Pine



Butterfly on non-native wild radish



Brown Creeper hunts for food in non-native Eucalyptus

Kessler-1



Barn Owl nests in non-native palm tree



Song Sparrow in non-native wild radish



Garter snake feeds and hides in non-native Eucalyptus leaves



Kessler-1



House Finch in non-native plant



Yellow Swallow-tail Butterfly feeds in non-native Fennel



Red-tailed Hawk makes nest of, and in non-native Eucalyptus tree

Kessler-1



Brown Squirrel escapes in non-native Eucalyptus



Painted Lady Butterfly on non-native Wiegela



Great Horned Owl sleeps in Eucalyptus

Kessler-1



Possum hunts around in a non-native Pittosporum (Victoria Box)



coyote hunts in non-native iceplant



Great White Heron in non-native grasses



Kessler-1



Red Legged Frog in non-native pond plants



raccoon family nest in non-native pine



Twin Peaks is sprayed with Garlon4Ultra — note the required respirator is not being worn



Kessler-1

San Francisco and its native plants in 1806



Mount Davidson and its native plants 1885



Beehive deliberately destroyed by NAP people on October 14, 2011

Kessler-2

**Bill Wycko/CTYPLN/SFGOV**

10/27/2011 11:31 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: Public Comment on Draft Environmental Impact Report  
for Natural Areas Management Plan

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/27/2011 11:31 AM —

**Janet Kessler**

&lt;jannyck@aol.com&gt;

10/25/2011 06:42 PM

To bill.wycko@sfgov.org

cc

Subject Public Comment on Draft Environmental Impact Report for  
Natural Areas Management Plan

Mr. Bill Wycko  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103  
[bill.wycko@sfgov.org](mailto:bill.wycko@sfgov.org)

Subject: Public Comment on Draft Environmental Impact Report for Natural Areas  
Management Plan

Dear Mr. Wycko,

I am a resident of San Francisco, and am keenly interested in its wildlife, truly natural areas, and habitat. My prime occupation is taking photographs, and I study the behavior of urban wildlife – I spend three or more hours daily doing this. I have had exhibits at The Seed Gallery of The Tides Foundation in the Presidio, at the Josephine Randall Junior Museum, and at the main branch of the San Francisco Public Library. I have written articles and self-published a booklet to inspire acceptance of our coyotes and wildlife. I am specifically interested in our wildlife which is not protected because it is not on any “endangered” lists.

- 01 The current Draft Environmental Report appears to be slanted toward “Native Plant”  
management, at the expense of other interests.
- 02 The removal of so called “invasive” plants destroys habitat.
- 03 1. The report repeatedly mentions “invasive trees”, usually in reference to eucalyptus. This tree  
has not been shown to be invasive. The trees that are here were planted, many of them a century  
or more ago. The main issue appears to be that they are occupying land that Native Plant  
advocates want to convert to Native Plant areas.
- 04 2. The trees, as well as other plants targeted for removal (including blackberry brambles and  
vines) form valuable habitat for birds, animals and insects. By focusing on a handful of species,  
the needs of all the others are neglected. The areas of Native Plants do not appear to be superior  
habitat in general. With a few exceptions, they do not provide the cover or the food resources  
birds and animals need. Thousands of eucalyptus trees and thousands of cubic feet of bushy  
habitat are being destroyed.
- 04 Strong toxic pesticides are increasingly necessary.
- 04 3. Because Native Plants are no longer suited to this eco-system – and because of the need for  
NAP to stop Natural Succession, when different plants in turn dominate a particular area – the  
“Natural” Areas Program requires a great deal more pesticides than would be needed if these

Kessler-2

- 04 (Cont.) areas were truly natural. The Report underplays both the amounts and the toxicity of the pesticides that will be used. In fact, it does not even say how much will be used.
- 04 4. Garlon (triclopyr), Roundup (glyphosate), and Imazapyr are mentioned as the most likely chemicals to be used. Garlon is a Tier I (Most Hazardous) chemical. Roundup and Imazapyr are Tier II. No Tier III herbicides are even mentioned.
- 05 5. The report contains errors that minimize the impact of these chemicals.
- 05 On p 365, it says Garlon degrades quickly and has low toxicity to aquatic species. However, the Material Safety Data Sheet (MSDS) ([http://www.fs.fed.us/r5/eldorado/documents/freds/WEB%20Only/garlon\\_4\\_msdms\\_rev\\_030909.pdf](http://www.fs.fed.us/r5/eldorado/documents/freds/WEB%20Only/garlon_4_msdms_rev_030909.pdf)) says "Material is highly toxic to aquatic organisms" and also that it is "slightly toxic to birds." The MSDS also says the material is "expected to biodegrade only very slowly in the environment" and "Fails to pass OECD/EEC tests" (for ready biodegradability). The report says Garlon is being phased out; but if the NAP's tree-felling program goes through, a lot more will need to be used to prevent resprouting since it is the only herbicide known to prevent the resprouts of eucalypts.
  - 06 Imazapyr – which was approved for NAP's use in 2011 – is not approved for use in Europe. It moves readily in the soil, and is excreted by some plants through their root systems. It does not biodegrade quickly. Its end-product, quinolic acid, is a neurotoxin. The report does not mention these issues where it mentions using Imazapyr.
  - 07 Roundup (glyphosate) is the second most commonly used chemical in NAP (used 31 times in 2010 compared to Garlon's having been used 36 times). This has been linked to birth defects (including brain damage and neural tube damage) in humans and in animals. (Glyphosate-Based Herbicides Produce Teratogenic Effects on Vertebrates by Impairing Retinoic Acid Signaling; Carrasco et al. <http://pubs.acs.org/doi/abs/10.1021/tx1001749>) It is also highly lethal to amphibians, according to a University of Pittsburgh study. This is a concern because many of the areas where it is used have water nearby. Glen Canyon, for instance, has a stream running through it. Roundup is also associated with changes to the soil and fungal root disease. <http://www.reuters.com/article/2011/08/12/us-glyphosate-idUSTRE77B58A20110812>
  - 08 The main argument used by the Draft EIR to justify the use of pesticides in the natural areas is that NAP is following the rules, that therefore by definition there is no environmental impact from its use. (This reminds me of a recent US Supreme Court decision in which patients harmed by medical devices are now prohibited from suing the manufacturers of those devices if they were approved by the FDA.) There are two reasons why this argument is not an adequate defense: (1) NAP's uses of both Garlon and Imazapyr have been granted by exception by the Department of the Environment and they are not used by other agencies in the city. (2) NAP does not always follow the rules, such as posting a date of the application of the pesticide as required by policy.
  - 09 The report says that only 10% of SF RPD's pesticide use is in Natural Areas, which are 25% of the total area. However, certain places, such as sports fields and golf courses, use a disproportionate amount of herbicides. If the natural areas were truly natural, they would need no herbicides at all. The SFNAP should use no Tier II or Tier I herbicides.
  - 09 NAP was originally intended to preserve the few remnants of San Francisco's historical habitat, but the program has morphed into an empire that controls over one-quarter of all the city-managed parkland — land for which access is being limited by the NAP program in a city coping with more and more people. We have wonderful natural areas — forests, thickets and overgrown areas, which everyone loves as they are — they are truly natural — but they are being



Kessler-2

09 removed for NAP's program.  
 NAP is actually harming the environment by destroying trees, established habitat, and established ecosystems which include our existing wildlife. NAP wants to recreate our environment as one of native grasses which might have existed in the area in 1776 — in very delimited spaces this seems fine, but they should not be taking over our parks which have evolved on all levels since that time. The grasses were native to a sand-dune ecology, but that is no longer the case within the city, and the grasses provide no protective habitat to the animals which now occupy these spaces — animals which are not on NAP's "specified" or "endangered" lists. There has been an alarmingly high rate of failure when "endangered" species have been introduced — this is because they are no longer suited to this environment which has evolved and changed since 1776. NAP is a political program, not a program based on science, and one which is hampering people's enjoyment and use of their parks.

10 And what about birds, raptors and furry animal life that are not on the endangered lists — wildlife which already lives in these areas now? There is no mention of these in the EIR. To put in their grasses, NAP is destroying healthy trees — trees which, besides offering animal habitat, offer shade, wind barriers, beauty and psychological relief. The trees are part of ecosystems

11 which were established over 100 years ago. They are a part of a balanced, healthy animal habitat. What ever happened to saving the trees?

09 We have now discovered that, for native plants, there is a huge issue of "sustainability" which has been totally overlooked by the NAP program: the Native Plants in fact cannot survive without artificial means of keeping them going, including huge amounts of human management and poisons to keep other growth down: this project is an absolute waste of resources. And the result is artificial museum gardens which preclude other uses of the parks — access to more and more areas is being restricted because of the NAP program. The very phrase "natural areas" is totally deceptive to the public — these are artificial creations.

(Cont.) 09 If you need to look at areas which have been left totally bare because NAP ripped out what was there, look at the periphery of Pine Lake — the NAP program first began there 15 years ago and it is a mess. And now the lush growth in Glen Canyon is slowly and systematically being removed, NAP is turning a gem of a wilderness park — something that everyone wants retained — into a native grassland area, even removing and thinning truly-native willows and coyote brush. No one wants these parks turned into these artificial museum gardens except the NAP people themselves. Twin Peaks is sprayed with poisons every four months so that native plants can grow. More people that I speak to are for ending the NAP domination of our so-called "natural areas."

12 For all these reasons, the Proposed Project as well as the "Maximum Restoration Alternative" are bad for wildlife, habitat and environment. The "Maintenance Alternative", as stated in the Draft

13 Environmental Impact Report on page 526, states that this is the Environmentally Superior Alternative because it has the least negative impact on the environment of all alternatives. Of

14 these alternatives, I am advocating the "Maintenance Alternative." However, I and many others would like to see the NAP program actually cut back extensively. Page 2 of your

15 summary needs to be corrected to reflect what page 526 of the Draft says: that the "Environmentally Superior Alternative" is the "Maintenance Alternative."

Please let's preserve nature -- true nature and wildlife -- not these artificially created museum gardens for which NAP is destroying the forests, thickets and underbrush we have in our parks. The native plant gardens are non-sustainable and need constant human intervention and poisons, and they are limiting access to those of us who use the parks.

Sincerely,  
 Janet Kessler  
[www.urbanwildness.com](http://www.urbanwildness.com)  
[www.coyoteyipps.com](http://www.coyoteyipps.com)

Kind-1



**Bill Wycko/CTYPLN/SFGOV**  
10/31/2011 11:46 AM

To: Jessica Range/CTYPLN/SFGOV@SFGOV  
cc  
bcc  
Subject: Fw: NAP

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 11:47 AM -----



**Jean Kind**  
<sfmomdog@yahoo.com>

10/31/2011 10:38 AM

Please respond to  
Jean Kind  
<sfmomdog@yahoo.com>

To: "bill.wycko@sfgov.org" <bill.wycko@sfgov.org>  
cc  
Subject: NAP

Dear Mr. Wycko,

01

I am very much opposed to the NAP that would close the Lake Merced dog play area and reduce off-leash dog recreation on Bernal Hill and in McLaren Park.

I believe enough land has been set aside for the preservation of native plants within our urban environment.

These are areas where residents of San Francisco, myself included, regularly walk with their dogs and their children.

Thank you,

Jean Kind  
2165 15th Avenue  
San Francisco, CA 94116

King-1



**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 04:15 PM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc:

bcc:

Subject: Fw: Regarding the the NAP EIR for Dog Play Areas

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 04:15 PM —



**carpediva**

<carpediva@gmail.com>

10/31/2011 02:46 PM

To: bill.wycko@sfgov.org

cc:

Subject: Regarding the the NAP EIR for Dog Play Areas

Dear Mr. Wycko:

I am writing to offer my brief comments on the changes being proposed by the recent NAP EIR as the relate to Dog Play Areas. I have lived directly across the street from McLaren park for over 6 years, and have walked my dog in that DPA nearly daily for that period. I have seen absolutely no visible deterioration of the natural resources of McLaren. (And in fact, the park has become safer over the years due to the presence of so many dogs and their walkers & owners.)

01

The changes proposed appear to have been made based on a series of assumptions of how dogs MAY be impacting natural areas, but the "data" provided is spotty, inconclusive, and in some portions of the report, flat-out incorrect. The lack of scientific method or quantifiable results is disturbing, and certainly shouldn't provide a basis for making such sweeping changes that will negatively impact so many citizens.

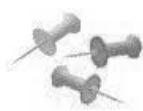
McLaren Park in particular remains one of only places in the city where dogs and their owners can exercise together over great distances, while co-existing peacefully with the natural inhabitants of the park, as well as other human users. I urge you to reconsider the proposed changes being made, and allow our already limited DPAs to remain as they are.

Thank you for your time.

Respectfully,

Julie King  
The Portola  
San Francisco, CA 94134

Klebaner-1



**Bill Wycko/CTYPLN/SFGOV**

06/05/2012 10:52 AM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject: Fw: Draft Environmental Impact Report for Natural Areas Management Plan

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 06/05/2012 10:52 AM —



**<klebaner@wellsfargo.com>**

06/05/2012 08:32 AM

To: <bill.wycko@sfgov.org>

cc: <John.Avalos@sfgov.org>, <Sean.Elsbernd@sfgov.org>, <David.Chiu@sfgov.org>, <Carmen.Chu@sfgov.org>, <malia.cohen@sfgov.org>, <Eric.L.Mar@sfgov.org>, <jane.kim@sfgov.org>, <Christina.Olague@sfgov.org>, <David.Campos@sfgov.org>, <mark.farrell@sfgov.org>, <mayoredwinlee@sfgov.org>, <scott.wiener@sfgov.org>

Subject: FW: Draft Environmental Impact Report for Natural Areas Management Plan

Dear Mr. Wycko,

01

I'm opposed to this plan. Cutting healthy trees and using herbicides should be illegal. It **would** have **significant negative impact** on wind and shadow, hydrology and water quality, and forest resources - the findings are incorrect.

02

MAINTENANCE ALTERNATIVE is the only acceptable alternative. Personally, I'd like the NAP eliminated all together.

Sincerely,

Susanna Klebaner,  
SF - 94121



Koster-1

October 13, 2011

RECEIVED

OCT 17 2011

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

Mr. Bill Wycko  
Environmental Review Officer  
SF Planning Department  
1650 Mission St., Ste. 400  
San Francisco, CA 94103

RE: Draft EIR Natural Areas Plan

Dear Mr. Wycko:

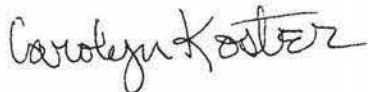
I'm not a scientist but I understand and appreciate science, having spent my career working at UCSF. The so-called restoration ecology espoused by the backers of NAP is not backed by science but by ideology. I am appalled that this movement has apparently taken over government agencies that should be representing all the people, not a vocal minority.

01

The expansion of the NAP and the destruction of healthy, mature trees in many areas of SF is not only a waste of tax-payer money but a blight on the landscape. If more people were aware of the plan, I'm sure they would be pounding down the doors of City Hall in protest. But ordinary citizens are too busy with their lives, working, taking care of their children, etc. Also, there is no coverage of this issue in our local papers as far as I have seen.

I have seen pictures of SF in the 1800s and it is not an attractive sight. Windswept, barren, sand dunes creating wind tunnels from the ocean to downtown. Is that what we want to recreate? If this inevitable result of what the NAP supporters desire was put to the public in an open vote, I'm sure it would be voted down. As representatives of the citizens of SF, I urge you to support our interests and reject the EIR and the specious 'science' it's predicated upon.

Sincerely,



Carolyn Koster

Koury-1

**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 04:13 PM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc:

bcc:

Subject: Fw: Natural Areas Program comment

— Forwarded by: Bill Wycko/CTYPLN/SFGOV on 10/31/2011 04:14 PM —

**carl.staryan@comcast.net**

10/31/2011 03:14 PM

To: bill.wycko@sfgov.org

cc:

Subject: Natural Areas Program comment

Dear Mr. Wycko,

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.

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?

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.

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.

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.

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

01

Koury-1

01  
(Cont.) [ Program, who are intent on removing the lush vegetation that I enjoy in our parks.  
Thank You  
Sincerely,  
Richard Koury  
38 Lynch St.  
San Francisco, CA

Kovinsky-1



**Bill Wycko/CTYPLN/SFGOV**

10/27/2011 05:10 PM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject: Fw: please oppose ggnra plan

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/27/2011 05:11 PM —



**Matthew Kovinsky**

**<kovinsky@gmail.com>**

10/27/2011 04:40 PM

To: bill.wycko@sfgov.org

cc

Subject: please oppose ggnra plan

01 [ open offleash is already so limited and busy. please dont curb access.  
thank you

Kushner-1

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

October 31, 2011

Comments on the draft Environmental Impact Report for the Natural Areas Program

## INTRODUCTION

As to whether or not habitat restoration works, to quote Greg Gaar, prominent natural historian of San Francisco, "NAP and volunteer work parties have been extremely successfully in preserving the native plant communities on Mt. Davidson. Those rich habitats would have been destroyed by rapidly advancing eucalyptus, English ivy, cotoneaster, blackberry etc. if folks have not been controlling the weeds for the last twenty years.

"The Nootka Reed Grass Community on the spine of Mt. Davidson is amazingly healthy considering that it is surrounded by invasive exotics.

"The Huckleberry Scrub Community on the north side of the mountain is unique to San Francisco and probably to California. This plant community would have been destroyed by weeds by now. Thanks to NAP and volunteers, it thrives today.

"Habitat Restoration works."

Secondly, the issue of habitat restoration versus recreation is a false dichotomy. We recreate by playing cards and computer games, by playing tennis or soccer. To place recreation as opposed to the Natural Areas Program is patently absurd, especially under the rubric of an *environmental* impact statement. Two exceptions are 1) the recreation of walking and looking at nature, which was at the top of activities chosen by San Franciscans in a survey done by the Neighborhood Parks Council, and 2) the recreation of doing habitat restoration.

San Francisco is truly remarkable to have these remnant native sites, which are due to chance in some cases and the rugged terrain in others. I was raised in St. Louis; nowhere was there a natural area. Everywhere horticulture, rather than nature, reigns in St. Louis. These natural remnants are not merely 'exotic horticulture'. **They are our natural history** as much as are the birds of the Pacific Flyway, the Mission Blue butterflies, and the endangered clapper rail. Our children and our grandchildren deserve their **preservation, enhancement and expansion.**

## SPECIFIC COMMENTS

- 01 [ 1) With respect to the description of the twenty-two natural areas in San Francisco, the DEIR is accurate, thorough and complete.
- 02 [ 2) The consideration of Sharp Park should be removed from the DEIR and placed on a separate planning track.
- 03 [ 3) The evaluation of the various environmental impacts should be redone. Comments below:
  - Table 21 in the dEIR compares the project and the proposed alternatives relative to the various considerations that make up an environmental impact, i.e., Land Use and Land Use Planning, Aesthetics, Cultural and Paleontological Resources, Wind and Shadow, Recreation, Biological Resources, Hydrology and Water Quality, Hazards and Hazardous Materials, Agriculture and Forest Resources, and Air Quality. This list in the dEIR does not grade or weight the considerations; it merely views them as though they were all equal.
  - The legislative intent of the California Environmental Quality Act does not view these considerations as equal. The preservation and enhancement of the environment are more

Kushner-1

03  
(Cont.)

important than these other issues. The evaluation of the different alternatives in the NAP dEIR relative to their environmental impacts should be made in the context of the intent of the CEQA legislation and not treat impact considerations as equals. The most disconcerting aspect of the considerations listed in Table 21 is that all are treated as though each is equivalent to biological resources, and yet this is not according to the legislative intent of the CEQA code. (For example, there is even no mention of "recreation" in the legislative intent.)

#### § 21000. LEGISLATIVE INTENT,

The Legislature finds and declares as follows:

(e) Every citizen has a responsibility to contribute to the preservation and enhancement of the environment.

#### § 21001. ADDITIONAL LEGISLATIVE INTENT

The Legislature further finds and declares that it is the policy of the state to:

(a) Develop and maintain a high-quality environment now and in the future, and take all action necessary to protect, rehabilitate, and enhance the environmental quality of the state.

(b) Take all action necessary to provide the people of this state with clean air and water, enjoyment of aesthetic, natural, scenic, and historic environmental qualities, and freedom from excessive noise.

(c) 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 and examples of the major periods of California history.

(d) Ensure that the long-term protection of the environment, consistent with the provision of a decent home and suitable living environment for every Californian, shall be the guiding criterion in public decisions.

(e) Create and maintain conditions under which man and nature can exist in productive harmony to fulfill the social and economic requirements of present and future generations.

(f) Require governmental agencies at all levels to develop standards and procedures necessary to protect environmental quality.

Throughout the dEIR, the various potential impacts should be re-evaluated with respect to legislative intent. Below are a few examples:

04

*"Dog activity in DPAs is an existing use, and the SNRAMP does not propose increasing this activity; however, closing or reducing DPAs under the SNRAMP could intensify dog use in the remaining DPAs. In addition, because resources to enforce leash laws are limited, dogs would likely continue to be let off leash in parts of Natural Areas outside of DPAs, even though that activity is prohibited. As a result, dogs may currently be impacting and may continue to impact protected plant species in or near DPAs. Pet owners may contribute to disturbance via trampling. **As a result, implementation of the SNRAMP could have significant adverse impacts on these species.**" [Emphasis added.]*

This conclusion is very odd and out of sorts with the intent of CEQA. A more appropriate conclusion would be the mitigation that the Recreation and Parks Department enforce leash laws more adequately. The department has a beefy Parks Patrol division that could certainly be used to enforce leash laws, with fines that strongly encourage compliance. [sfweekly.com—article

Kushner-1

attached].

*"The Maximum Restoration Alternative meets some, but not all, of the project objectives presented in Section III.C. Specifically, the Maximum Restoration Alternative does not meet the objective related to recreation, as the Maximum Restoration Alternative would provide additional restrictions on public use and access of the Natural Areas."*

05

*"This alternative has impacts similar to those discussed for the proposed project. However, implementing management actions that restore native habitat throughout all Natural Areas would take precedent over implementing management actions for recreation facilities. Compared to the proposed project, this alternative involves no new trails in the Natural Areas, thereby providing reduced recreation opportunities. The Natural Areas Program would continue to promote passive recreation."*

*"This alternative would further reduce the size of existing DPAs, so it could increase the use of the remaining DPAs, potentially resulting in greater physical deterioration of recreation facilities, compared to the proposed project. As with the proposed project, these impacts are expected to be less than significant. Within the cumulative timeframe, the GGNRA Dog Management Plan also would restrict dog use on GGNRA lands that may result in potentially significant and unavoidable cumulative impacts associated with the physical deterioration of the Natural Areas DPAs."*

These excerpts demonstrate the crux of the issue of how recreation and public use (i.e., unleashed dogs) are given the same weight as habitat restoration. This is counter to the intent of the CEQA legislation, which nowhere mentions recreation (or dogs or companion animals).

06

(Another oddity in dEIR is that with all of the attention the voluminous document gives to dogs, nowhere is dog urine mentioned. Good people do "pick up after" their dogs, but certainly not the urine. With an estimated 130,000 dogs in San Francisco, dog urine is an environmental hazard to many, many plants. Surely this oversight in the dEIR is unintentional, but it should be corrected.)

07

Simply stated by the organization, Nature in the City, "If the recreation and maintenance alternatives are the '**environmentally superior alternatives**' and neither the *restoration* nor the proposed project are, then this analysis is flawed."

In summary, there is something out of sink with the intent of the CEQA legislation and it occurs throughout the dEIR. The draft needs to be changed to comply with intent, according to the legislative code of the State of California.

Sincerely,

Pinky Kushner  
1362 6<sup>th</sup> Avenue  
San Francisco, CA 94122

Kushner-1



**Bill Wycko/CTYPLN/SFGOV**  
10/31/2011 09:07 AM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject: Fw: pdf footnote for comments on the dEIR for the NAP

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:08 AM -----



**Pinky Kushner**  
<pinkykushner@mac.com>  
10/31/2011 08:44 AM

To: bill.wycko@sfgov.org

cc

Subject: pdf footnote for comments on the dEIR for the NAP

Greetings Mr. Wycko,  
Attached here is a pdf footnote for my comments about the dEIR for the  
NAP.  
Thank you,  
Pinky Kushner  
1362 6th Avenue  
San Francisco, CA  
pinkykushner@mac.com



S.F. Park Patrol1.pdf



Kushner-1

## Ranger Noir: S.F. Park Patrol Run as Money Machine

By Matt Smith

published: Wed., Sep. 21 2011 @ 12:40 PM



This week's *SF Weekly* cover story "Ranger Noir" takes a close look at the law enforcement unit that covers San Francisco park facilities, and discovers an agency seemingly gone bad.

Among its findings:

A full-time Park Patrol supervisor holds a second, separate full-time job with the state of California. Park staffers say he often doesn't show up to work. But Department of Recreation and Park operations manager Denny Kern says he approved this arrangement. "The explanation is, there is no conflict," his spokeswoman told us.

Another Park Patrol allegedly skips his rounds and sleeps during his graveyard shift, then shows up for work the next day to log overtime hours, thus doubling his \$53,000 salary. He's considered one of the chief park ranger's favored employees.

The man in charge of the unit, meanwhile, reportedly manipulates overtime assignments and then divvies them up among buddies, saving some plum ones for himself.

Last year, chief Park Patrol Officer Marcus Santiago collected more than \$85,000 in overtime pay on top of his \$67,000 annual salary, averaging more than 70 hours of work per week, 52 weeks annually.

Perhaps the most bizarre aspect of this story is that some of the apparent wrongdoing has been going on under the noses of high-ranking government officials.

According to the story:

Santiago has been the target of whistleblower and other complaints. To cover his tracks during one city inquiry, Santiago allegedly told underlings to backdate overtime paperwork, according to multiple sources with knowledge of the situation. Another time, Santiago reportedly responded to a request for cellphone records -- which might have shown a city investigator whether or not he was lying about overtime -- by claiming that he'd dropped his phone in water. Despite investigating some of these complaints, his boss, Recreation and Parks Operations Manager Dennis Kern has protected Santiago, *SF Weekly* has found. Late this summer, following an extensive investigation, the federal Equal Employment Opportunity Commission authorized an internal report documenting the overtime allegations. The report showed evidence of discrimination against employees not in his inner circle and retaliation against complainants. It also affirmed that Santiago misled city officials on his San Francisco employment application in order to cover up that he was fired from the Oakland Police Department on allegations of misappropriating evidence and abusing people in custody.

The Park Patrol has been run for years as Marcus Santiago's personal fiefdom. Now that this is out in the open, I'm curious to see if Mayor Ed Lee will ask his parks General Manager Phil Ginsburg to get rid of this apparent liability.

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Showing 2 comments



**Oneslimcat** 1 month ago

Sounds like the good old boys club to me. What happen to cutting Overtime for no essential City Employees.



**starchild** 1 month ago

Nice exposé. So I wonder, will this be enough to get Marcus Santiago, Thomas Tom, and Jose Mitra fired, and Hanley Chan's company barred from doing business with the city? And what about the rangers' bosses, who've been letting them get away with it, Operations Manager Dennis Kern and Parks chief Phil Ginsburg? Are you listening, Rec & Park Commissioners, Mayor Lee? When you're running for mayor and the city's facing massive recurrent deficits, seems like it might not be the best time to be letting rampant corruption and overtime abuse go unchecked.



Langille-1

**Bock, John**

---

**From:** Jessica.Range@sfgov.org  
**Sent:** Tuesday, November 01, 2011 3:47 PM  
**To:** Bock, John  
**Subject:** Fw: SF Natural Areas Plan

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](http://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 03:21 cc  
PM  
Subject  
Fw: SF Natural Areas Plan

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 11/01/2011 03:22 PM -----

celeste langille  
<cclangille@earth  
link.net>  
To  
"bill.wycko@sfgov.org"  
10/31/2011 11:09 <bill.wycko@sfgov.org>  
PM cc  
Subject  
SF Natural Areas Plan

Langille-1

Dear Mr. Wycko,

I am writing to advocate that the maximum restoration alternative must include restoring the whole Sharp Park golf course to endangered species, bird and other wildlife habitat for a truly ecologically sustainable coastal lagoon restoration.

Please separate out Sharp Park from the Natural Areas Plan so that San Francisco's nature and biodiversity is not dragged down by Sharp Park and its golf course.

For over a decade, SF Recreation and Parks Natural Areas Program has been working to realize the Significant Natural Resource Areas Management Plan (SNRAMP), the most important environmental document in San Francisco's history.

Please include and analyze the following considerations:

- The Natural Areas Plan goals are sufficient,

- The SNRAMP DEIR, with notable exceptions, does an excellent job analyzing the environmental impacts of the Natural Areas Plan.

- The Plan is NOT radical. In fact, the Proposed Project neglects to 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, which designation perpetuates a fragmented approach to natural resources management.

- For the purposes of the SNRAMP DEIR, recreation should include community stewardship. This would change the balance of purported recreational impacts.

- That the recreation and maintenance alternatives are the "environmentally superior alternatives" and neither the restoration nor the proposed project are, is, apparently, an unfortunate paradox of CEQA, where biodiversity is considered no more important than aesthetics or recreation within the human environment.

- The true impacts (and benefits!) of the maximum restoration alternative cannot be properly evaluated against the proposed project, since the description is only two pages long. Thus, no such definitive conclusions about recreation impacts or biological benefits can be made because there is no substance to the alternative. It is totally general.

Therefore, please separate out Sharp Park from the Natural Areas Plan! In addition, please ensure that the City and County of San Francisco places the protection of the natural environment and endangered species at Sharp Park Golf Course at the highest priority.

Thank you  
Celeste Langille

Sent from my iPhone

Lansdown-1

Victoria Lansdown  
105 Jarboe Ave.  
S.F. CA. 94110

Bill Wycko  
Environmental Review Officer  
1650 Mission St.  
S.F. CA. 94103

**RECEIVED**

OCT 17 2011

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

10/17/11

Dear Sir,

I am writing regarding the expansion and implementation of the Natural Areas Program. I am a native San Franciscan, who raised three children here. I am a home owner in Bernal Heights and I operate a small business in the city. I have a long time vested interest in the parks. As a home owner and small business operator, I pay thousands of dollars yearly in taxes and licensing fees to the city of San Francisco. Now I find out that access to my local park for the recreation of walking my dog is about to be denied.

**HOW DARE THEY!**

How dare the staff, especially Lisa Wade, tell me what I can or cannot do in the parks I **PAY FOR!** I am outraged and incensed. How dare they usurp almost 70% of our public lands, denying taxpayers use of their parks, for their own elitist agenda. Bernal Heights is a dense mid-town neighborhood, whose residents need access to that open space. Hundreds of people use that park on a daily basis. How does Lisa Wade have the nerve to arbitrarily dictate how our parkland is to be used?

01

Furthermore, by their own admission, NAP can barely manage the land they have. Two years ago, they met then Mayor Newsom, demanding more money for their program, claiming they didn't have the budget for the projects they were then attempting. And now, they want more?!?!?! They want more land and more money to perpetuate this myth that they can restore the land to pre-Colombian condition. That is not even possible.

*And to take away land from public usage under such pretense is an OUTRAGE!*

As a taxpayer and home owner in the city of San Francisco, I demand this folly be stopped.

Sincerely,



Victoria Lansdown

Lapins-1

October 30, 2011

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

**RE: Draft Environmental Impact Report for the Natural Areas Resource Management Plan**

**SENT VIA E-MAIL TO: bill.wycko@sfgov.org**

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. |

Lapins-1

Page 2

10-30-11

- 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

Denise Lapins

Via my e-mail address: dlapins415@comcast.net  
15 Belgrave Avenue  
SF, CA 94117

This letter sent separately from the one signed by Tank Hill Neighbors as I was away when signatures were collected.

Lee-P-1

**From:** Bill Wycko  
**To:** Jessica Range  
**Subject:** Fw: environmental impact report (EIR)  
**Date:** 10/11/2011 09:14 AM

---

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/11/2011 09:14 AM -----

**PC Lee**  
**<pamleesf@yahoo.com>**

To "bill.wycko@sfgov.org" <bill.wycko@sfgov.org>  
cc

10/10/2011 09:12 PM

Subject environmental impact report (EIR)

Please respond to PC Lee <pamleesf@yahoo.com>
--

Dear Mr. Bill Wycko,

01

I am writing you in regarding on some of the public parks closures to dogs environmental impact report (EIR). I am asking you do not take away this beautiful city San Francisco provides to people and dogs. Dogs need places to run just like people need open space for outdoor activities. Dogs do not ask anything from human and they do not have voice. Let them have what nature can provide to them.

Sincerely,

Pam

Lee-Y-1

Rich Text Editor

Page 1 of 2

November 14, 2011

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



Attention: Bill Wycko, Environmental Review Officer

Re: Supporting Designation of Sharp Park Golf Course as a "Historical Resource"

Dear Mr. Wycko:

I have been a San Francisco resident since 1975. I love the City and also enjoy the surroundings of my neighborhood very much. That is the reason for me and my family to live in the same Parkside home for over 36 years. Personally, I do not consider myself as a community activist. Nonetheless, I have continuously and faithfully served my civic duties, such as casting ballots regularly and serving as a juror when required. Occasionally, I aspire to express my view on a specific civic subject when I deem necessary, such as the Sharp Park case.

01

I am writing this letter to fully support the decision to designate Sharp Park Golf Course as a "historical resource". Besides those historical and technical grounds which have already been presented by the experts on this topic, I just want to add that, as a retiree who is living in the city, I believe the Sharp Park Golf Course is a vital golf links for modest income people who love the golf game. As we all know there is no other place around the City to play the game on a nice course like Sharp Park at such affordable rates.

I am gratified if you could take my view into consideration.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Yen L. Lee".

Rich Text Editor

Yen L. Lee  
545 Crestlake Drive  
San Francisco, CA 94132

Page 2 of 2

cc: Carmen Chu, San Francisco Board of Supervisors  
San Francisco Public Golf Alliance

<http://us.mg1.mail.yahoo.com/neo/launch>

11/14/2011



Lendaro-1

**Bock, John**

---

**From:** Jessica.Range@sfgov.org  
**Sent:** Tuesday, November 01, 2011 11:56 AM  
**To:** Bock, John  
**Subject:** Fw: Please Help Save the dog areas!

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](http://www.sfplanning.org)

----- Forwarded by Jessica Range/CTYPLN/SFGOV on 11/01/2011 11:57 AM -----

Bill  
Wycko/CTYPLN/SFGO  
V  
To  
Jessica Range/CTYPLN/SFGOV@SFGOV  
11/01/2011 10:36 AM cc  
Subject  
Fw: Please Help Save the dog areas!

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 11/01/2011 10:36 AM -----

"Melody Lendaro"  
<mlendaro@moscone.com>  
To  
<[bill.wycko@sfgov.org](mailto:bill.wycko@sfgov.org)>  
11/01/2011 09:47 AM cc  
Subject  
Please Help Save the dog areas!

Lendaro-1

01 { Has anyone really looked at these native plants they are really really ugly....no one thinks they are worth saving at any cost... Every one who votes for this will NEVER get reelected because there are so many dog lovers in SF they won't stand a chance... Do we really need another matter to be upset about during these trying times...political unrest war and unemployment...now where to walk your dog..  
Give us a break....put this on the back burner until the economy turns around and we have jobs to go to instead of walking our dogs...

Melody Lendaro  
Director of Sales  
Moscone Center  
747 Howard Street, 5th Floor  
San Francisco, CA 94103  
Phone: 415-974-4023 Fax: 415-974-4073  
Email: [mlendaro@moscone.com](mailto:mlendaro@moscone.com)  
Sales Coordinator: Lorelei Lopez @ Ph:415-974-4055  
Email: [llopez@moscone.com](mailto:llopez@moscone.com)

Levins-1

ALAN S. LEVINS  
180 Twenty-Eighth Avenue  
San Francisco, CA 94121

RECEIVED

OCT 19 2011

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

October 18, 2011

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

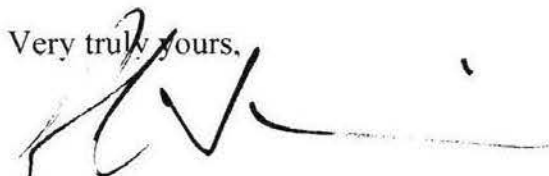
Re: Supporting "Historical Resource" Designation  
For the Sharp Park Golf Course  
Significant Natural Resource Areas, etc.  
DEIR No. 2005.1912E

Dear Mr. Wycko:

01 I am not a golfer, so my support for the Historical Resource Designation pending comes from a slightly different point of view. I wholeheartedly support the designation because of the unique, historic and wonderful asset San Francisco has – an authentic Alister MacKenzie 18-hole golf course. This is truly a treasure that should be preserved. As a long-term San Franciscan resident, moreover, I believe having this public golf course available at reasonable rates to people of all walks of life is what San Francisco is all about.

I vote, and I support this Historic Resource Designation.

Very truly yours,



Alan S. Levins

Firmwide:104595221.1 999999.1113

Links-1



**BO LINKS**  
585 Ortega Street  
San Francisco, CA 94122  
  
P: 415-564-3890  
C: 415-509-4133  
E: bo@slotelaw.com

September 29, 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 Mr. Wycko:

01 [ I am writing to fully support the decision to designate Sharp Park Golf Course as an  
"historical resource."

By way of background, I am a lifelong City resident and an avid golfer. I have served as a volunteer golf historian for the City & County of San Francisco for several years, providing historical data when the City has needed it in connection with the various golf courses maintained by the Recreation and Parks Department. I have published two golf books, both published by Simon & Schuster (*Follow the Wind*, a fantasy about a young man's encounter with Ben Hogan at San Francisco's Lincoln Park; and *Riverbank Tweed & Roadmap Jenkins: Tales from the Caddie Yard*, a series of short stories set at local Bay Area golf courses). I have also published two extended essays about significant golf events in the City (*Return to Glory*, about the revival of Harding Park; and *More Than A Game*, about the creation of an inner city driving range and First Tee facility at Visitacion Valley Middle School).

In addition, I am the only two-time winner of the Lido Design Contest sponsored by the Alister MacKenzie Society, which is an international competition designed to recognize amateur golf course architects who best demonstrate a working understanding of Dr. Alister MacKenzie's core design concepts – the very concepts he utilized to create Sharp Park 80 years ago.

I am also a co-founder, along with Richard Harris, of the San Francisco Public Golf Alliance. Quite naturally, I fully endorse and support the letter he has submitted on September 20th behalf of our group, which numbers 5,000 strong. By this letter, I would like to add my individual voice to that of our group.

01 (Cont.) [ Sharp Park is the functional equivalent of fine art – it represents the work of an  
unquestioned master (Dr. Alister MacKenzie, renowned the world over as perhaps the greatest

Links-1

San Francisco Planning Department  
 Re: Designation of Sharp Park Golf Course  
 as an Historic Resource  
 September 29, 2011  
 Page 2

golf course architect in history) and the course today still contains the vast majority of timeless features Dr. MacKenzie created almost 80 years ago. While the course needs restoration work, that fact alone does not diminish its importance. Our Cable Cars needed work in order to save them, too. And so do many of our fine buildings, which are architectural landmarks themselves.

Th fact is, Sharp Park is a part of our collective history. It is living breathing organism that requires our tender, loving care. And golfers around the world know of the course and appreciate its beauty and what it represents as an outstanding example of golf course architecture in the game's "golden age." In a sense, Sharp Park stands as does the Palace of Fine Arts as a reminder of a time long ago, and something worth preserving for generations to come. The extra bonus in this case is that the golf course itself has always been -- and remains today -- a vital recreational resource for modest income people who love the game of golf. It is used by diverse group of people who, quite literally, have no place else to play the game at affordable rates. The course has been recognized far an wide as an historic property and has demonstrated that golfers and endangered species can get along with each other in a healthy environment.

I am gratified that the City and County of San Francisco has joined the chorus to support Sharp Park Golf Course as a public resource worthy of preservation. This decision is clearly correct on the historic record, and is another reminder that San Francisco is the City that knows how.

For all of these reasons, as well as those expressed in the San Francisco Public Golf Alliance's letter dated September 20, 2011, I am proud to support the designation of Sharp Park Golf Course as an historic resource under the California Environmental Quality Act.

Thank you for considering my views.

Sincerely,



BO LINKS

BL/r

Cc: Hon. Jackie Speier, Member, House of Representatives  
 Hon. Ed Lee, Mayor, City & County of San Francisco  
 Hon. Mary Ann Nihart, Mayor, City of Pacifica  
 Hon. David Chiu, President, San Francisco Board of Supervisors  
 Hon. Carole Groom, President, San Mateo Board of Supervisors  
 Mr. Phil Ginsburg, San Francisco Recreation & Parks Department  
 Mr. Charles Edwin Chase, AIA,  
 President, San Francisco Historic Preservation Commission  
 San Francisco Public Golf Alliance

Links-2

## SLOTE & LINKS

255 California Street, Suite 1300  
San Francisco, CA 94111-4925  
Phone 415-393-8001  
Fax 415-294-4545

Robert D. "Bo" Links  
bo@slotelaw.com

•  
Adam G. Slote  
adam@slotelaw.com

•  
*Of Counsel*  
Stephen M. Boreman  
steve@slotelaw.com

June 11, 2012

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 Resources, etc.  
DEIR No. 2005.1912E**

Dear Mr. Wycko,

I am a San Francisco resident and attorney, and am a co-founder of the San Francisco Public Golf Alliance. I am also a volunteer golf historian for the City and County of San Francisco, and am a serious amateur golf designer.<sup>1</sup> This letter is based on my knowledge of golf history and architecture, and upon my historical research, including research in the old San Francisco newspaper records of the San Francisco Public Library.

01 [ I write this letter in support of the San Francisco Planning Department's designation of Sharp Park Golf Course as an "historical resource" under the California Environmental Quality Act.<sup>2</sup> I also write this letter to point out several serious factual errors in the October 27, 2011 letter of Wild Equity Institute's "historic landscape architect" Chris Pattillo, which errors discredit Mr. Pattillo's analysis.

By letter dated October 31, 2011, Wild Equity Institute challenges the Planning

---

<sup>1</sup> I am the only two-time winner of the Alister MacKenzie Society's annual Lido Design Competition, having won the honor in 2007 and 2008.

<sup>2</sup> San Francisco Planning Department, Historic Resource Evaluation Response, Case No. 1005.1912E, dated February 8, 2011, at page 2.

Links-2

## SLOTE & LINKS

Attorneys at Law

Mr. Bill Wyco  
San Francisco Planning Department  
*Re: Supporting "Historical Resource"*  
*Designation for the Sharp Park Golf Course*  
*Significant Natural Resources, etc.*  
*DEIR No. 2005.1912E*

June 11, 2012

Page 2

Department's historical resource designation, on grounds that Sharp Park Golf Course "no longer retains integrity."<sup>3</sup> For this claim, Wild Equity relies on Mr. Pattillo's October 27, 2011 letter<sup>4</sup>.

In his letter, Mr. Pattillo alleges: (1) Sharp Park Golf Course today has "only [one] hole [that] is similar to the original design"<sup>5</sup>; (2) "the course no longer reflects the work of Alister MacKenzie"<sup>6</sup>; (3) "Construction of a seawall in 1941 . . . eliminated . . . the essence of the links design concept"<sup>7</sup>; and (4) "Sharp Park Golf Course lacks integrity."<sup>8</sup>

But Mr. Pattillo displays serious lack of understanding of both (1) the design of Sharp Park Golf Course as it was actually built by Dr. MacKenzie in 1930-1932, and (2) the current (2012) configuration of the golf course. Nowhere in his letter does Mr. Pattillo state that he actually paid a site visit to Sharp Park Golf Course, or that he has any familiarity with golf course architecture. It is apparent from his letter that neither is the case.; indeed, many of Mr. Pattillo's claims are wildly at odds with both the historical facts and the current layout of the golf course.

The design and construction of Sharp Park began with an initial conceptual plan by Dr. Alister MacKenzie, with his associate H. Chandler Egan, a version of which was published in the San Francisco Chronicle February 23, 1930.<sup>9</sup>

---

<sup>3</sup> Letter, Wild Equity Institute to Bill Wycko, San Francisco Planning Department, October 31, 2011 (on file with the Planning Department), at pages 4-5.

<sup>4</sup> Letter, Chris Pattillo to Bill Wycko, October 27, 2011 (on file with the Planning Department).

<sup>5</sup> *Id.*, p. 2

<sup>6</sup> *Id.*, p. 3

<sup>7</sup> *Id.*, p. 2

<sup>8</sup> *Id.*, p. 4

<sup>9</sup> San Francisco Chronicle, Daily Sporting Green, "Chandler Egan Will Inspect Sharp Park Golf Course as City Park Board Plans Early Construction Start," February 23, 1930. (Copy attached as Exhibit 1).

Links-2

**SLOTE & LINKS**

Attorneys at Law

Mr. Bill Wyco  
 San Francisco Planning Department  
 Re: Supporting "Historical Resource"  
*Designation for the Sharp Park Golf Course*  
*Significant Natural Resources, etc.*  
 DEIR No. 2005.1912E  
 June 11, 2012  
 Page 3

Construction and grow-in took two years, and the course was opened on or about April 16, 1932. At the time of the opening, the San Francisco Chronicle on or about April 9, 1932 published a map of the golf course *as actually constructed*.<sup>10</sup> Also at or about Opening Day, 1932, the golf columnist for the San Francisco Call-Bulletin, Frank Noon, published a hole-by-hole description of the golf course by MacKenzie's construction assistant Jack Fleming.<sup>11</sup>

Mr. Pattillo's comparison of the historic Sharp Park to the current golf course ignores both the 1932 as-built map of the course and Jack Fleming's description of the Opening Day holes. Instead, Mr. Pattillo incorrectly bases his analysis on the 1930 conceptual routing map<sup>12</sup>, which differed in several particulars from the golf course that existed on Opening Day, 1932.<sup>13</sup>

I am familiar with the Sharp Park Golf Course as it exists today, as reflected in the current golf course scorecard (a copy of which is attached hereto as Exhibit 4). Twelve of today's holes (numbers 1, 2, 3, 8, 9, 10, 11, 13, 14, 15, 17, and 18) are original Opening Day holes, only slightly modified by the passage of 80 years, while two others (numbers 12 and 16) utilize original fairways, but do not have original greens.<sup>14</sup>

<sup>10</sup> San Francisco Chronicle, Daily Sporting Green, April 9, 1932, "Sharp Park Fairways Ready". (Copy attached as Exhibit 2.)

<sup>11</sup> San Francisco Call-Bulletin, "Tee Topics: Here's What you'll find at Sharps Park; Fleming Describes City's Newest Layout," by Frank P. Noon, March (?), 1932. (Copy attached as Exhibit 3.)

<sup>12</sup> Letter, Chris Pattillo to Bill Wycko, October 27, 2011, *supra*, p. 1, at fn. 2.

<sup>13</sup> For example: The 1930 conceptual routing plan shows Original Hole 1 and 12 as straightaway 4-par holes; whereas the 1932 as-built map and Mr. Fleming's written descriptions disclose that by Opening Day, show Original Hole 1 as a dogleg-right 4-par, and 12 as a dogleg 5-par hole.

<sup>14</sup> It can readily be seen by comparing the 1932 As-Built Map (Exhibit 2) with the current Scorecard (Exhibit 4), the Jack Fleming Opening Day hole-by-hole descriptions (Exhibit 3), and an aerial view of the current golf course (Sharp Park Golf Course (Sharp Park Historical Resources Evaluation Report, Fig. 2), that the holes on today's Sharp Park Golf Course correspond to MacKenzie's 1932 Opening Day holes as follows: Current Hole 1 was Opening Day Hole 16; current Hole 2 was Opening Day Hole 15; current Hole 3 was Opening Day Hole 13; current hole 8 was Opening Day Hole 14 (shortened from 130 to 100 yards); current Hole 9 was Opening Day Hole 17; current hole 10 was Opening Day Hole 18; current Hole 11 was



Links-2

**SLOTE & LINKS**

Attorneys at Law

Mr. Bill Wyco  
 San Francisco Planning Department  
 Re: *Supporting "Historical Resource"*  
*Designation for the Sharp Park Golf Course*  
*Significant Natural Resources, etc.*  
*DEIR No. 2005.1912E*

June 11, 2012

Page 4

The hole descriptions contained in Mr. Pattillo's October 27, 2011 letter do not reflect that he either consulted the current scorecard or bothered to visit Sharp Park Golf Course before writing his letter.<sup>15</sup> His factual claims cannot possibly withstand the scrutiny of any knowledgeable observer.

Typical of Mr. Pattillo's distortion is his incredible statement that the Sharp Park sea wall "eliminated . . . the essence of the links design concept."<sup>16</sup> Alister MacKenzie, himself an authority on links golf, having been the consulting architect at the Old Course at St. Andrews, Scotland and the architect at the Cypress Point Club on the Monterey Peninsula, declared that Sharp Park "has a great resemblance to real links land."<sup>17</sup> To this day, as it always has, the golf course borders the ocean, with views of the coast headlands, while the sea air, wind, and weather strongly affect play of the course. Thus, Sharp Park embodies the essence of links golf.

01  
 (Cont.)

I also wish to comment on the issue of Sharp Park's qualification for historical status under Criteria A/1, association with significant historical times and events. Sharp Park was designed and built during the so-called "Golden Age of Golf" in the United States and California, during which history's greatest golf architects, including Alister MacKenzie, were

Opening Day Hole 1; current Hole 12 is the tee and a portion of the fairway of Opening Day Hole 2; Current Hole 13 is Opening Day Hole 9; current Hole 14 is Opening Day Hole 10; current Hole 15 is Opening Day Hole 11; current Hole 16 is played in the western fairway of the double-fairwayed Opening Day Hole 5; current Hole 17 is Opening Day Hole 5 (minus the western double-fairway); current Hole 18 is Opening Day Hole 12.

<sup>15</sup> For example, at page 2 of his October 27, 2011 letter, Mr. Pattillo mistakenly states that the area occupied by original holes 13, 14, and 15 (current holes 3, 8, and 2, respectively) "today... has four holes, that all run east-west." In making this statement, Mr. Pattillo appears to have confused current Holes 2, 3, and 8 with current holes 4, 5, 6, and 7 (which do generally run east-west). He says that original hole 16 (current #1) was replaced by current Hole No. 3, and says further that Original Hole 17 (current hole #9) was replaced by current No. 8 ("a short, straight fairway"). It stretches the imagination that these mistakes could have been made by someone who took the trouble to make a site visit to Sharp Park.

<sup>16</sup> Letter, Chris Pattillo to Bill Wycko, October 27, 2011, *supra*, p. 1, at fn. 2.

<sup>17</sup> Alister MacKenzie, "The Spirit of St. Andrews," Sleeping Bear Press, 1995, at p. 172.

Links-2

**SLOTE & LINKS**

Attorneys at Law

Mr. Bill Wyco  
 San Francisco Planning Department  
 Re: *Supporting "Historical Resource"*  
*Designation for the Sharp Park Golf Course*  
*Significant Natural Resources, etc.*  
*DEIR No. 2005.1912E*

June 11, 2012

Page 5

01  
 (Cont.)

building courses and expanding the reach of the sport in the United States and around the world.<sup>18</sup> During this period, golf was expanded, by construction of Sharp Park and other public courses, to the urban masses. Sharp Park has always fulfilled its role as the "poor man's Pebble Beach": great architecture for the common people. In this connection, in 1955 Sharp Park was the site of the inaugural tournament of the Western States Golf Association<sup>19</sup>, one of the country's oldest and largest African-American golfing societies. Sharp Park thus played a significant role in the racial integration of American public recreation.

Finally, I have personally walked Sharp Park with several of the nation's great present day architects, including Robert Trent Jones, Jr. and Jim Urbina, and with Michael Keiser, the developer of the highly-acclaimed Bandon Dunes Golf Resort in Oregon.<sup>20</sup> I have also toured the course with Mike Davis, President of the United States Golf Association and with Lyn Nelson, Executive Director of the Northern California Golf Association.

All of these knowledgeable golf experts have commented to me in no uncertain terms that Sharp Park is a special, historic golf course that needs to be preserved. Tom Doak, one of the worlds leading golf course architects and himself a Mackenzie restoration expert, has personally visited the site on more than one occasion and recently expressed to me how grateful he is that Sharp Park is still here after all these years; he is a passionate advocate for its restoration.

Perhaps the most telling comment came from noted MacKenzie restoration architect Jim Urbina, who asked: "Does the City understand what it has here?"

<sup>18</sup> See, generally, Geoff Shackelford, "The Golden Age of Golf Design," Sleeping Bear Press, 1999, at Introduction, pages 1-3, and at the chapter entitled "The MacKenzie School of Design" (where he calls MacKenzie ""arguably the most charismatic, original and creative golf architect of the Golden Age." (Copies of relevant pages attached hereto as Exhibit 5.)

<sup>19</sup> See letter of Bay Area Golf Club of Northern California to Bill Wyco, dated October 11, 2011, on file with the Planning Department.

<sup>20</sup> See letter of Michael Keiser to San Francisco Planning Department, September 22, 2011, on file with the Planning Department.

Links-2

**SLOTE & LINKS**

Attorneys at Law

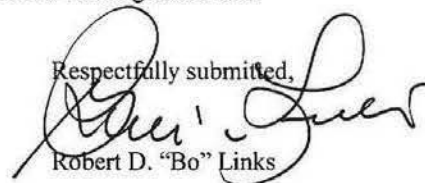
Mr. Bill Wyco  
San Francisco Planning Department  
Re: *Supporting "Historical Resource"*  
*Designation for the Sharp Park Golf Course*  
*Significant Natural Resources, etc.*  
*DEIR No. 2005.1912E*

June 11, 2012

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I therefore respectfully submit these comments in the hope that they are helpful, and also in the hope that the City will confirm and retain the designation of Sharp Park as an important historical resource that should be saved for future generations.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Bo Links", written over the typed name.

Robert D. "Bo" Links

RDL/r

Enclosures

cc: Mr. Phil Ginsburg (by email)  
Ms. Dawn Kalamathan (by email)  
Mr. Richard Harris, SF Public Golf Alliance

Links-2

# **EXHIBITS**

# **FOLLOW THIS PAGE**

Links-2

\* \* \* \* \* SAN FRANCISCO CHRONICLE DAILY SPORTING GREEN \* \* \* \* \*

## Links Raise Arguments on "Play as It Li

### 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. Allister 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.

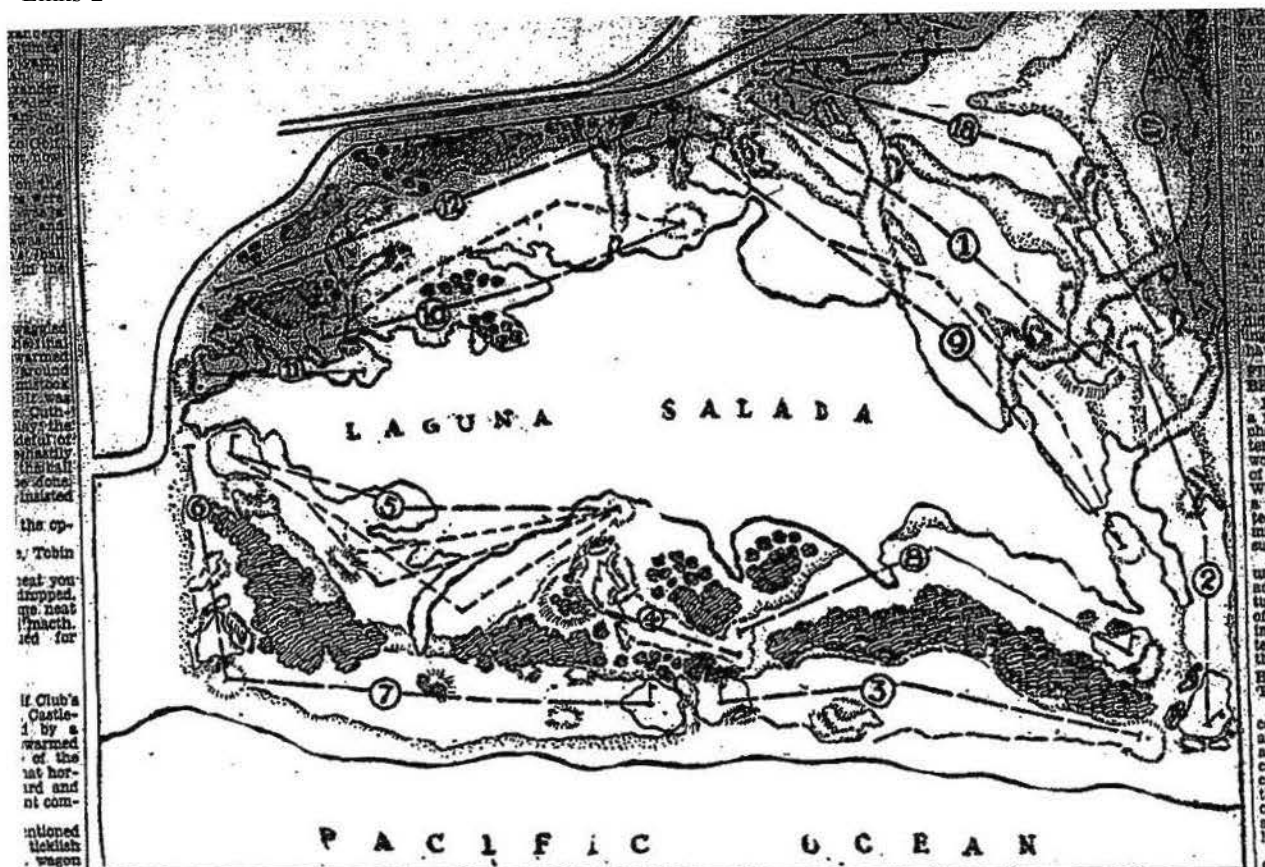
Hole	Yds.	Par	Hole	Yds.	Par
1	420	4	10	380	4
2	358	4	11	169	3
3	476	5	12	430	4
4	140	3	13	440	4
5	280	4	14	210	3
6	179	3	15	370	4
7	375	4	16	410	4
8	455	5	17	430	4
9	580	5	18	420	4
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			Out	3340	37
Total				6590	71

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Links-2



**SAN FRANCISCO'S** third municipal golf course, Sharp Park, is depicted in this diagram, showing the plan devised by Architects Alister Mackenzie and H. Chandler Egan. Construction is to begin Monday, March 3, according to plans of the Park Commission and Architect Egan. The course is located at Salada Beach. It is reached by the Skyline boulevard, half an hour's drive from the City Hall. 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.

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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 uncanny ability to suit the layout to the terrain and the purpose 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 birdies. With Lake Salada furnishing a fine natural water hazard, it will be more testing 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 Alameda county line, and sixteen miles from the City Hall. The rest of the \$150,000 needed to complete the course and clubhouse was 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 6590 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 3250.

also Athens Club Trousers

## Fight by Rounds

### ROUND ONE

The pair met in the center of the ring and sparred at long range. Corbett shot a light left to the body and followed up with a light left to the jaw. They clinched. Fields missed a right to the head. The champion worked cautiously but uncocked two hard rights to the jaw which caused Corbett to back away. Corbett was short with a left to the body and fell into a clinch. Jackie blocked a left to the body and Corbett clinched. Corbett staggered Fields with a left to the chin and repeated with a series of lefts and rights. Fields retreated into a clinch but came out of it to find Corbett's jaw with a mean right. Corbett had a slight advantage in the opening round.

### ROUND TWO

Corbett started things by sending lefts and rights to the head. Both boys resorted to rough stuff in a clinch. Fields missed a right and Corbett nailed him with a left to the face.

Fields scored lightly with a right to the jaw and they clinched again. Jackie tapped Corbett with two light rights and cuffed Corbett with a left in a clinch. Corbett sunk his left into the pit of the champion's stomach and followed up with another left to the jaw.

back with another sharp right to the head. Corbett landed a left to the body but took three rights to the ribs at close range.

Corbett connected with a lusty left to the jaw and landed again with the same punch as he fell into a clinch. The Fresno repeated with two more lefts to head and body and came back with another series of lefts, which reached the champ's ribs. Fields came in fast, but could not avoid Corbett's left hand. The southpaw wrestled Fields around the ring at the bell. Corbett's round.

### ROUND SIX

Fields opened with a light right to the head, but remained at a cautious distance from his foe. Corbett rocked Fields' head with a left but Jackie came back with two right taps to the face and Corbett clinched.

The Fresno southpaw lashed out with a sweeping left which found the champion's face. Fields put two rights to Corbett's head, and Corbett retaliated with a left to the cheek. The champion took another hard left as he came into a clinch. Corbett tied Fields up at close quarters. Fields assumed the aggressive, but could not escape another Corbett left. Corbett's left thudded against the champion's face twice at the bell.

## Benny Bass Battles Draw With Anderson

MILWAUKEE, Wis., Feb. 23 (AP)—Benny Bass, Philadelphia, junior lightweight champion, and Eddie "Cowboy" Anderson, Chicago, fought a 10-round draw, featured by nine knockdowns here tonight. Bass' title was not at stake.

The ninth round, with both fighters endeavoring to land a knockout punch, was replete with thrills. During this session the champion 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 referee in calling the bout a draw met with favor of the fans.

## Lou Magnolia Will Referee Miami Bout

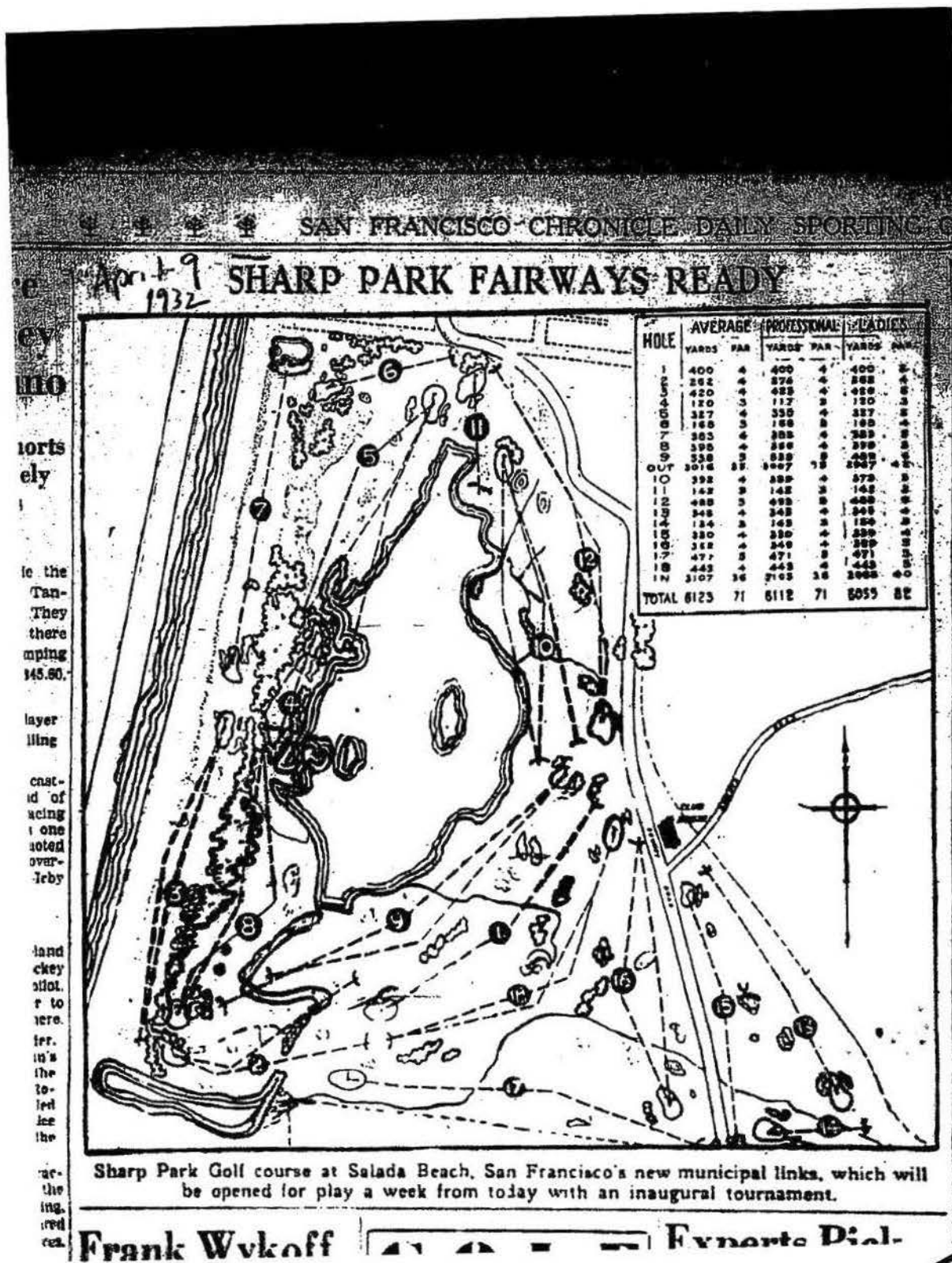
MIAMI, Feb. 22 (AP)—Lou Magnolia of New York has been selected to referee the fifteen-round heavy weight elimination battle between Jack Sharkey of Boston and Phil Scott of England at Madison Square Garden's second "Battle of the Palms" February 27.

The selection was announced after a conference between fighters, managers and promoters of the af-

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Links-2



## San Francisco Call-Bulletin, March (?), 1932

## TEE TOPICS

By FRANK  
P. NOONHere's What You'll Find at Sharnps Park  
Fleming Describes City's Newest Layout

With the opening of the Sharnps Park course set for April 1, a lot of farway folks want to know what the "going" is like between the netter 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 superintendent of the course, the writer agrees with Jack Fleming, the writer agrees with Jack Fleming, the superintendent of the course, that he has had one whole-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 "sophisticated" 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 think, 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—352 yards, par 4. A short, two shotted. 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—430 yards, par 4. One of the ocean holes constructed on the beach—in a slight depression bounded by sand and water grass embankment on left, trees on right. Entrance to green slightly advantageous from left on account of trap.

No. 4—150 yards, par 3. A one shotted. Green very large, but well trapped in front and right, trees on left and rear.

No. 5—271 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. Easy route probably will cost at least one extra stroke to get on, while the other combinations of force and routes give rewards proportionate to their respective risks.

No. 6—168 yards, par 3. A difficult putt. Green well trapped.

No. 7—323 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—338 yards, par 4. A dog-leg, quite different 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 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 on.

No. 9—328 yards, par 5. 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 score again and get in under par.

## SECOND NINE

No. 10—383 yards, par 4. One of the best holes, two tees, 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—145 yards, par 3. A fairway trap hole. Water and sand carry, trap green. Green, however, is long and should receive an average straight ball easily.

No. 12—168 yards, par 3. Fairway flat, double dog-leg. Not difficult except to get two good, straight drives in succession.

No. 13—316 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 lake-side and ocean side holes. No. 13 is an upland type of hole-of-average difficulty. The green is well trapped.

No. 14—134 yards, par 3. This short hole has two tees. The tee with the carry across the creek opens hole green easily while, on a crossing creek to the other tee a more difficult shot over a trap as the green is encountered. Directly into prevailing wind.

No. 15—110 yards, par 4. Similar to No. 11. At present along the edge of the county road, which it is planned to re-locate. No. 15 green is near clubhouse.

No. 16—353 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 hill.

No. 18—445 yards, par 4. This 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.



Links-2

**Hole Descriptions  
from  
Opening Day - 1932**

**Hole 1 (current 11<sup>th</sup> hole)**

409 yards - Par 4

A fairly long two shot hole slightly dog legged. No particular difficulties to a straight hitter.

**Hole 2 (current 12<sup>th</sup> hole)**

262 yards - Par 4

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 (fallow)**

120 yards, Par 3

A one shotter. Green very large, but well trapped in front and right, trees left and rear.

**Hole 5 (right fairway is current 17<sup>th</sup> hole)**

327 yards - Par 4

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.

**Hole 6 (fallow)**

158 yards - Par 3

A difficult par. Green well trapped.

**Hole 7 (lost - parallels current 16<sup>th</sup> hole)**

383 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 8 (fallow)**

398 yards - Par 4

A dogleg, 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 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 on.

**Hole 9 (current 13<sup>th</sup> hole)**

538 yards - Par 5

A lakeside 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 14<sup>th</sup> hole)**

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 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 15<sup>th</sup> 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.

## Links-2

**Hole 12 (current 18<sup>th</sup> hole)**

486 yards - Par 5

Fairway flat, double dogleg. Not difficult except to get two good straight drives in succession.

**Hole 13 (current 3<sup>rd</sup> 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 (lost - current 8<sup>th</sup> green site)**

134 yards - Par 3

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 2<sup>nd</sup> hole)**

339 yards - Par 4

Similar to No. 12. At present along the edge of the county road, which it is planned to relocate. No. 15 green is near clubhouse.

**Hole 16 (current 1<sup>st</sup> hole)**

363 yards - Par 4

A nice hole with two optional routes and a creek to cross.

**Hole 17 (current 9<sup>th</sup> hole)**

471 yards - Par 5

A long hole down the south property line. The green is on a 15 foot fill.

**Hole 18 (current 10<sup>th</sup> hole)**

443 yards - Par 4

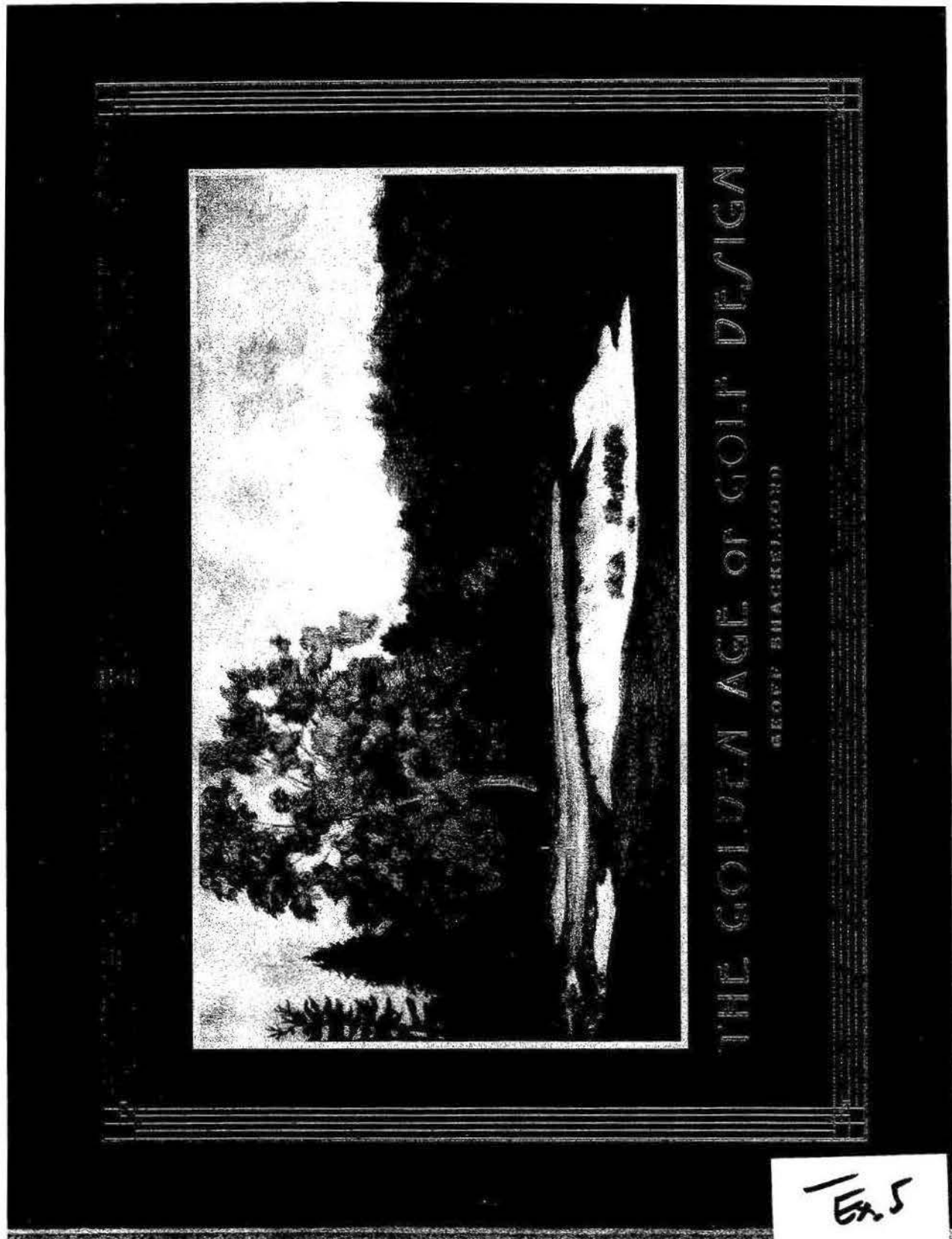
The finishing hole is long and hazardous if not successfully played on both long shots, but the green is wide, open and nicely rolling in order to lend interest to the many thrilling final decisions which will no doubt be made on it. A clump of trees guards the green on the left.

~~Ex 4~~

Class A PGA Professional - Gregory Ritschy																				Manager - Mark Duane										Superintendent - Wayne Kappelman									
Back	362	332	360	453	193	408	405	99	471	3083	414	413	205	551	383	142	360	340	491	3299	6382	71.2/119																	
Middle	353	319	348	443	175	393	376	93	455	2955	407	401	185	519	362	134	368	319	483	3178	6138	70.0/116																	
Forward	334	289	315	433	146	335	360	87	444	2743	363	361	161	461	355	119	360	262	458	2900	5643	68.5/121																	
Par	4	4	4	5	3	4	4	3	5	36	4	4	3	5	4	3	4	4	5	36	72	Rating/Slope																	
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Links-2



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Sleeping Bear Press  
121 South Main Street  
P.O. Box 20  
Chelsea, MI 48118  
www.sleepingbearpress.com

Printed and bound in Canada.

10 9 8 7 6 5 4 3 2 1

Library of Congress Cataloging-in-Publication Data  
Shackelford, Geoff.

The golden age of golf design / by Geoff Shackelford.

p. cm.

ISBN 1-886947-31-7

1. Golf courses--United States--Design and construction--History--20th century.

2. Golf course architects--History--20th century. I. Title

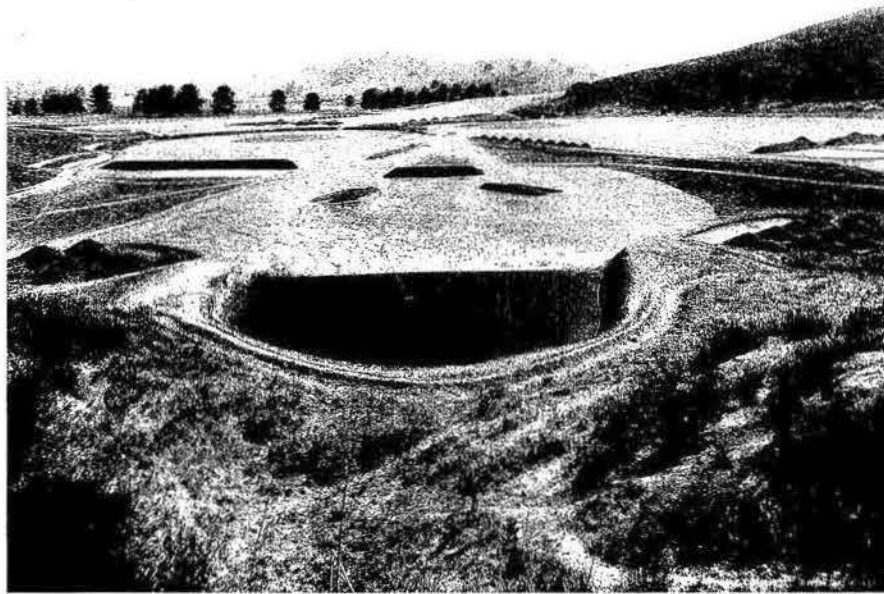
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## INTRODUCTION

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*An example of early geometric design, circa 1900. This is the original Annandale Golf Club in Pasadena, California. Note the oiled sand green and chocolate drop mounds.*

At some point in their life every adult longs for the “good old days” when things were simpler and times were better. Sometimes, in our desire to paint the past as an idyllic time, we selectively ignore certain facts that might taint our rosy remembrances of the way things used to be. Sometimes our nostalgia for times past is justified, other times it is not. For the game of golf, there was no better or more prosperous time than the 1920s. The twenties really were the good old days.

Many will argue that the 1940s and early 1950s, when Nelson, Hogan and Snead ruled the game, was golf’s Golden Age. However, beginning in 1911, when Charles Blair Macdonald opened The National Golf Links of America on Long Island, golf took an important step forward and did not look back until the leanest years of the Great Depression. Not only were virtually all of the greatest courses in America built during this twenty-five year period, the game itself expanded rapidly thanks in large part to the inspiring play of Bobby Jones.

In the early 1890s, you could count the number of golfers in the United States on two hands. By 1930 there were 2.25 million Americans playing the game. The number of golf courses had



## The Golden Age of Golf Design

*"Viewing the monstrosities created on many modern golf courses which are a travesty on Nature, no golfer can but shudder for the soul of golf. It would seem that in this striving after 'novelty and innovation,' many builders of golf courses believe they are elevating the game. But what a sad contemplation! Motoring to Southampton, I pass a goodly number of new courses. As I view the putting greens it appears to me they are all built similarly, more or less of a bowl or saucer type, then built up toward the back of the green, and then scalloped with an irregular line of low, waving mounds or hillocks, the putting green for all the world resembling a pie-faced woman with a marcel wave. I do not believe any one ever saw in nature anything approaching these home-made putting greens. Then scattered over the side of the fairway are mounds modeled after haystacks or chocolate drops. The very soul of golf shrieks!"*

— C.B. Macdonald

increased from 742 in 1916 to a total of 5,691 by 1930. The people of the United States were putting World War I behind them by creating better transportation, using new modes of communication and enjoying fresh forms of recreation.

Aided by rapid economic expansion, the decade between 1920 and 1930 was perhaps the most creative, daring and innovative period in American history. In no place was this more evident than in golf course architecture, where early layouts were transformed from mundane and geometrically-edged mediocrities, to grand-scaled, artistic and strategically designed masterpieces.

Sadly, golf course architecture has never come close to scaling the heights it achieved between 1911 (when C. B. Macdonald opened his ideal course on Long Island) and 1937 (when Perry Maxwell constructed the first nine holes at Prairie Dunes). A look at any of the rankings in contemporary golf magazines reveals that an overwhelming majority of the top courses were created during this Golden Age. Recently, *Golfweek* magazine resorted to splitting their rankings into two eras, operating on the valid premise that it is not possible to compare more recent design work with the classics of the past.

So how did this happen? What made the Golden Age such a special time, and why hasn't anything since measured up to the superiority of this era?

For one thing, the Great Depression and World War II played significant and understandable roles in squelching the desire of American architects to try something more bold and daring than the Golden Age work. In addition, American golfers have drastically changed their expectations for golf architecture and the game's style of play from the way it was played in the 1920s. Today, beauty and stroke play are in; strategy and match play seem to be a thing of the past.

The primary inspiration back then was still the Scottish way of playing shots close to the ground. And match play, which allowed architects more freedom to create daring holes where high scores might be racked up from time to time, had not been overtaken by stroke play as the primary method of competition. Also, luck was considered an interesting facet of the game during the Golden Age, whereas in today's game architects and superintendents are asked to do everything in their power to eliminate luck, which certainly limits the more creative design concepts.

The modern American game is also plagued by

a mechanical, numbers-driven mind-set. If a layout does not stretch to well over 7,000 yards and play to a par 70 or more, it is not considered a worthy test of golf. If the course record is low and the layout is vulnerable to good scores, there must be something faulty in its design. Of course, nothing could be further from the truth. Great courses yield to skillful golf and joy can be found on any well-designed course, no matter what the scorecard says.

Today's courses are rarely designed to make golfers think. More often than not, they seem to only serve as beautiful settings in which golfers may launch shots high into the air only to land on soft, green turf. However, the primary mark of a top course during the Golden Age was not its prettiness or the color of its grass, though the Golden Age designers certainly created the most stunning bunkers and contours ever seen. But the landmark courses from the Golden Age were special then and timeless now because of their ability to test the mental as well as the physical component of the golfer's game, a concept better known as strategy.

The Golden Age came about because of many unique factors falling into place most conveniently. Time brought on a negative reaction to

5





## CHAPTER FIVE

## THE MACKENZIE SCHOOL OF DESIGN

Although the most appropriate designation for Alister MacKenzie would have been in a design school created by his first mentor, H.S. Colt, MacKenzie's remarkable portfolio requires the designation of his own school. From masterpieces like Cypress Point and Augusta National, to lesser-known but equally as brilliant designs like Pasatiempo and Crystal Downs, MacKenzie was arguably the most charismatic, original and creative golf architect of the Golden Age.

Born in Yorkshire, England in 1870, MacKenzie spent many of his summers as a young man in the highlands of Scotland. He studied at Cambridge and earned degrees in medicine, natural science, and chemistry before serving as a field surgeon in the Boer War where he developed many of his theories on camouflage. MacKenzie studied how the Boer soldiers hid themselves in the treeless fields and later applied his observations to golf course design.

Following the war, MacKenzie briefly practiced medicine in Leeds, England, and in his spare time created models of greens and bunkers while serving as Green Committee Chairman at Alwoodley Golf Club. H.S. Colt, an established architect at the time, visited the Leeds area in 1907 and stayed at MacKenzie's residence where the two evidently discovered many philosophic similarities. Colt then requested

MacKenzie's assistance in the redesign of Alwoodley. They eventually worked together on several other projects and in 1914 MacKenzie achieved some fame when his submission of a par-4 drawing won first prize in C.B. Macdonald's *Country Life* magazine contest. The contest-winning hole, judged by Horace Hutchinson, Herbert Fowler, and Bernard Darwin, was later constructed by C.B. Macdonald and Seth Raynor at the now defunct Lido Golf Club on Long Island, New York.

MacKenzie's medical practice had been dissolved and he was dabbling in architecture, but war broke out and the British Army called on his services. After the war, MacKenzie formed a partnership with Colt and C.H. Alison. Just two years later, Dr. MacKenzie published his first book, *Golf Architecture*, a concise text which was one of the first to clarify the fundamentals of design.

The Colt-MacKenzie partnership deteriorated around this time and MacKenzie began to work independently. During the 1920s MacKenzie made an extended trip through South Africa, New Zealand, and Australia, designing courses on paper and leaving them to the talented Alex Russell and others to construct. Two Australian courses, Royal Melbourne's West Course and the highly touted redesign of Kingston Heath, are the most noted layouts from this period of MacKenzie's work.

*The MacKenzie School of Design*

158



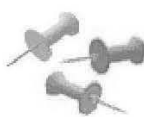
Doctor Alister MacKenzie

The late '20s marked MacKenzie's most influential accomplishments in America, where he formed three notable, but brief, design partnerships. The first was with millionaire Socialist Robert Hunter, which dissolved sometime after Cypress Point was completed. MacKenzie then joined forces with H. Chandler Egan, who was fresh off a redesign of Pebble Beach Golf Links where MacKenzie had rebuilt the eighth and thirteenth greens in 1926. But that partnership created few if any designs together. Finally, MacKenzie established a Midwest partnership with Perry Maxwell. Among his finer courses in America were his collaborations with Hunter at the Valley Club of Montecito, The Meadow Club and Cypress Point, all opened by 1928. He followed those with a solo design at his new Santa Cruz home, Pasatiempo, in 1929. He was also responsible for several other interesting California designs at Union League Golf Club, Haggin Oaks Golf Course, Claremont Country Club and Sharp Park Municipal, and redesigns at Lake Merced Golf Club and California Golf Club.

MacKenzie won the design job for Augusta National Golf Club (over a disappointed Donald Ross) sometime in late 1930 and began the two-year design process. In 1933 he completed Crystal Downs Country Club in Michigan where Perry Maxwell oversaw the construction. MacKenzie also designed the University of Michigan golf course, again supervised by Maxwell, and made plans for the Ohio State courses which were built many years after his death.

MacKenzie died in Santa Cruz, California in 1934, and his ashes were spread over the Pasatiempo golf course via airplane. Living those final years in Santa Cruz beside the sixth fairway, MacKenzie wrote a second book on architecture, *The Spirit of St. Andrews*, a manuscript thought lost until almost sixty years later when his step-grandson discovered it buried in a chest full of papers. Its brilliant content serves as a perfect reminder as to why MacKenzie may have been the most complete of all the Golden Age architects.

Litehiser-1

**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 09:22 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: NAP EIR Comments

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:22 AM -----

**Linda Stark Litehiser**

&lt;linda.litehi@gmail.com&gt;

10/30/2011 08:40 AM

To bill.wycko@sfgov.org

cc

Subject NAP EIR Comments

T0: Bill Wycko, Environmental Review Officer  
 SF Planning Department  
 1650 Mission St. Suite 400  
 San Francisco, CA 94103

Dear Mr. Wycko,

- 01 I am writing in response to the Natural Areas Plan EIR adoption. I have some serious concerns about many aspects of the proposals.
- 02 1. I am strongly in favor of adopting the least restrictive plan I believe this is the Maintenance Alternative. I feel that our parks and open spaces must be as "multi-use" as possible. We need to allow both passive and active recreation in our parks.
- 03 2. The current trend in our city planning is to provide more housing and increase density (Park Merced development is a good example), this mean we will need to have more accessible open space for recreation and park enjoyment, not less.
- 03 3. I have a dog and use many of the parks listed in the EIR report for dog play recreation. McLaren Park is my favorite park for off leash recreation. The park is large and has ample trails and areas for dog walkers. The park has struggled for years with perceptions of isolation and unsafe conditions. The introduction of large numbers of dog walkers in the past decade has increased park safety-- more people, more eyes on the trails-- has seen a big increase in people feeling comfortable walking alone in the park. This is also backed up by crime statistics.
- 04 4. I also want to comment on what I consider an obsessive zeal of some Natural Areas promoters to restrict use of large parts of our parks for recreation...as well as the removal of plants, habitat and trees to "restore" the park lands to some sort of "pristine wilderness" dating back hundreds of years. We need to look first at the needs of our citizens to enjoy the outdoors in their local parks and have as much access to them as possible. Plans that restrict "people" use of the parks is going in the wrong direction. I am also concerned about the use of pesticides use on attempts to eradicate invasive species in areas where people ad pets may be exposed.
- I think my husband put it best, "a native plant is just an invasive species that got there first". We have to be sensible about how we use our open space. Urban parks need to serve their populations first.
- Best regards,

Linda Stark Litehiser  
 78 Havelock St.  
 San Francisco, CA 94112  
 (District 11)  
 415-585-8005

Lock-1

**From:** Bill Wycko  
**To:** Jessica Range  
**Subject:** Fw: People over pets  
**Date:** 10/05/2011 09:51 AM

---

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/05/2011 09:51 AM -----

**"Ken Lock"**  
**<KENWLOCK1@comcast.net>** To <bill.wycko@sfgov.org>  
cc  
10/05/2011 09:50 AM Subject People over pets

01

I am sickened by the fact that there are so many people out there who believe that the needs of their pets trump the health, safety and welfare of human beings. In addition to fines, confiscation and euthanasia of offending animals, I believe that the pet owners should undergo psychiatric counseling to straighten out their misconceptions that the welfare of pets takes precedence over that of human beings. POWER TO THE PEOPLE!

Loeffler-1

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

**RECEIVED**

**OCT 12 2016**

**CITY & COUNTY OF SF  
PLANNING DEPARTMENT  
M&A**

**RE: Natural Areas Program:**

**Dear Bill:**

I believe that the parks are for the people. I have lived in San Francisco since 1977 and would not want to be anywhere else. I lived near Golden Gate Park for 20 years, and was in the park every day as a dog recreation person or a bike rider. I purchased a home in the Portola neighborhood because it was near McLaren Park. I walk everyday with my dog and know the benefits for my health and my dogs. My dog is going to be 12 soon and you would not ever believe it because she runs, runs and runs in the park. If my dog (or any dog) only gets to walk as much as their owner, they are being deprived of their needed exercise. I am all for respecting natural areas of the parks, but to take more space away from people trying to recreate themselves and their dogs, does not make sense, especially in this tight financial climate, where people are looking for economical ways to recreate. Putting a well socialized dog on a leash will often make them more aggressive. There are more dogs than children in San Francisco. Dogs need to play, not be held on a leash.

01 McLaren Park is a Natural park. We who walk here, love it and come here because we love it AND because we have a dog that can RUN FREE. I would bet that most parks are used mostly by dog walkers. I can tell you that, I walk every day, and most of the people I see walking, have a dog with them. That is the largest percentage of people who use the parks.

McLaren Park is full of dog owners and dogs- please do not take away dog walking areas and do not make more stringent laws about putting dogs on leashes in more areas.

Sincerely,

  
**Joan Loeffler**

**1718 Burrows Street**

**San Francisco, CA 94134**

**415-816-1335**

Lorenz-1

**Bock, John**

---

**From:** Jessica.Range@sfgov.org  
**Sent:** Tuesday, November 01, 2011 3:49 PM  
**To:** Bock, John  
**Subject:** Fw: Public Comment on 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](http://www.sfplanning.org)

----- Forwarded by Jessica Range/CTYPLN/SFGOV on 11/01/2011 03:51 PM -----

Bill  
Wycko/CTYPLN/SFGO  
V  
To  
Jessica Range/CTYPLN/SFGOV@SFGOV  
11/01/2011 03:27 PM  
cc  
Subject  
Fw: Public Comment on NAP EIR

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 11/01/2011 03:28 PM -----

Henry  
<lorrad@gmail.com>  
>  
To  
[bill.wycko@sfgov.org](mailto:bill.wycko@sfgov.org)  
10/31/2011 04:57 PM  
cc  
Subject  
Public Coment on NAP EIR

Lorenz-1

- 01 I am a frequent user of the SF city parks and support the maintenance alternative. I grew up in SF and my elderly parents are long time residents of the Richmond district. We all enjoy the parks as they are and oppose significant changes in the balance of native vs non-native plants, cutting down trees and underbrush, using toxic chemicals to control invasive plants, and closing 25% of park trails. All of these have a significant impact on my family's quality of life and the recreational value of the parks to my family. I also am quite concerned that limited city finances are being used for these type of obituary projects, and a financial analysis hasn't been completed to understand the cost of the programs.
- 02 We also frequently visit Sharp Park, and the EIR does not address the significant impact of the unsightly fence and the proposed barrier between the golf course and the berm. People have been enjoying a small portion of the lagoon for generations and that is part of the historic design of the course. Just because the walkers aren't organized is no reason to ignore the aesthetic and usage impact of this major change to the park's design and usage. From what I observe, more people use the berm for recreation than use the golf course, and the berm is just as important to aesthetics and recreation as maintaining any other historical aspect of the course.
- 03 The EIR needs to do a comprehensive evaluation of the addition of any barrier and not present it as not having any impact.
- 04 Also, the plan does not recognize that the city of SF has already set aside huge areas for native plant habitats in the form of the San Francisco Peninsula Watershed. This needs to be acknowledged in the EIR.
- Thank you for considering my public comment.
- Regards,  
Henry Lorenz  
San Bruno, CA

Louie-1



**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 04:14 PM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: SF Natural Areas Plan

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 04:14 PM -----



**Denise Louie**  
<denise\_louie\_sf@yahoo.com>  
>

10/31/2011 03:06 PM

Please respond to  
Denise Louie  
<denise\_louie\_sf@yahoo.com>  
>

To "bill.wycko@sfgov.org" <bill.wycko@sfgov.org>

cc

Subject SF Natural Areas Plan

01

Dear Mr. Wycko,

Please SEPARATE out SHARP PARK from the Natural Areas Plan, so that San Francisco's nature and biodiversity are not dragged down by Sharp Park and its golf course. And please RESTORE SAN FRANCISCO'S NATURAL AREAS.

Natural areas are important to my family and me, because we believe that habitats for native plants and the wildlife that depend on certain plants have already been diminished by human impacts. We and our friends volunteer to remove invasive weeds, propagate local native plants and restore habitat in our backyards, at schools and plant nurseries. I'm so proud of my 6-year-old niece, who learned to pull oxalis at age 4 and who is now learning about habitats at school.

Thank you and have a nice day.

Sincerely,

Denise Louie

SF taxpayer, voter and volunteer



Lu-1

**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 11:43 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: comment on NAP EIR

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 11:43 AM -----

**kathy lu <klu7@lycos.com>**

10/31/2011 11:12 AM

To bill.wycko@sfgov.org

cc scott.wiener@sfgov.org

Subject comment on NAP EIR

Dear Mr. Wycko,

01

I am writing to express my dismay regarding the Natural Areas Program (NAP) disruption to San Francisco park areas. I am a 20-year resident of San Francisco and advocate for the natural environment (NRDC). The idea of "original" habitat restoration in the midst of urban areas is, in my opinion, misguided.

For the past ten years, I have visited and enjoyed numerous local parks with my mixed breed labrador. We frequent Tank Hill, Corona Heights, Bernal Heights, Buena Vista, Twin Peaks, Lower Twin Peaks Reservoir, Duboce Park, Dolores Park, Upper Douglass, Ocean Beach, and Stern Grove, as well as GGNRA off-leash areas and the Presidio. I am aware of RPD's efforts to "rehabilitate" parks with native flora and fauna.

01  
(Cont.)

I am not convinced that restoration of native species will succeed, and I do not agree that the effort required to do so is a good use of limited resources. Some of the attempts to "improve" local park areas have been obvious failures. The speculative impacts of people, plants and animals described in the EIR do not provide a sound basis for large-scale land use redirection. Programs such as NAP are, in fact, highly disruptive to already-established communities of flora and fauna, which may be non-native but at this point deserve to be left in place.

If public safety is an issue, due to naturally occurring root system failure, weather, or erosion, those issues should be addressed as they arise. Resource-intensive, anticipatory, poorly researched and planned interventions are usually ill advised. In my opinion, NAP is squarely in the ill-advised category due to mechanical and chemical interventions applied in a densely populated, frequently visited region.

Please reconsider NAP in light of what exists today. There are far better uses for The City's time and money.

Thank you for your attention.

Sincerely,  
K. Lu  
SF, CA 94114

Lundeen-1

**From:** [Bill Wycko](#)  
**To:** [Jessica Range](#)  
**Subject:** Fw: dog management plan  
**Date:** 10/06/2011 09:40 AM

---

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/06/2011 09:41 AM -----

**Eddie Lundeen**  
<[eddie@jobetty.com](mailto:eddie@jobetty.com)> To: [bill.wycko@sfgov.org](mailto:bill.wycko@sfgov.org)  
cc  
10/06/2011 07:19 AM Subject: dog management plan

Dear Mr. Wycko,

01 { dog parks add to a community and as a friend of mine Amy Breeze once said "dogs make people more human". I have seen this over and over again and have experienced this myself. In a world when it seems most people are texting, talking on

their smart phone or have head phones on and do not interact with each other, in dog parks you will see just the opposite. We are a little more "human" when we are at the dog park and educating park users and having guidelines for dog parks

makes a difference, just take a look at Point Isabel across the bay the largest off leash dog park in the nation managed by East Bay Regional Parks District.

Thank you,

Eddie Lundeen  
Jobetty, LLC  
[www.jobetty.com](http://www.jobetty.com)  
[eddie@jobetty.com](mailto:eddie@jobetty.com)  
[www.the-poop.com](http://www.the-poop.com)

Lynch-1

**From:** [Bill Wycko](#)  
**To:** [Jessica Range](#)  
**Subject:** Fw: Born in SF 1957  
**Date:** 10/04/2011 09:32 AM

---

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/04/2011 09:32 AM -----

**paul l**  
**<[paul.ignatius.lynch@gmail.com](mailto:paul.ignatius.lynch@gmail.com)>**      To: [bill.wycko@sfgov.org](mailto:bill.wycko@sfgov.org)  
10/03/2011 09:46 PM                      cc  
Subject: Born in SF 1957

- 01 [ Hey this dog stuff is way crazy...I am opposed to this for many good reasons. Live and let live...  
Paul Lynch SF

Mace-1



**Bill Wycko/CTYPLN/SFGOV**  
10/31/2011 09:25 AM

To: Jessica Range/CTYPLN/SFGOV@SFGOV  
cc  
bcc  
Subject: Fw: NAP EIR

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:25 AM -----



**Shannon Mace**  
<shannonmace@gmail.com>  
10/29/2011 05:45 PM

To: bill.wycko@sfgov.org  
cc  
Subject: NAP EIR

Mr. Wycko,

I have lived in San Francisco for the last three years, and in the Bay Area for the last eleven.

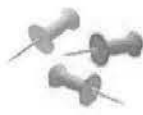
One of the things that I love about living here is how the City seems to understand the need for the people who have dogs to be able to exercise them. The City is a crowded place, and everybody needs to be able to live together. being able to exercise my dog assures that my dog is tired out every night, and not up and barking at every last noise she hears, keeping the neighborhood awake with her restlessness. It also ensures that she is happy and exercised, and not inclined to be bothered by other dogs or people when we walk on leash.

01 It seems, however, that City officials have decided that dogs destroy native plants around here. I walk my dog everyday around these parks, and I am here to tell you that that is simply not true. Responsible dog owners (and we are the majority of dog owners) don't let there animals off trails, or on native grasses or other plants. Just because you love your dog does not make you an enemy to the environment. It is also my observation that irresponsible dog owners are irresponsible people in general. They are irresponsible parents, and citizens. These people let their children, and their own actions do way more damage to the environment than any dog could do. Are you also gonig to ban children form the parks because they cause environmental damage?

02 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. 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. Less recreational space will negatively impact the quality of life in our city.

Sincerely,  
Shannon Mace

Madar-1



**Bill Wycko/CTYPLN/SFGOV**  
10/31/2011 09:23 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: Off leash areas for Dogs

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:23 AM -----



**Jennifer Madar**  
<jayarem415@me.com>  
10/29/2011 09:36 PM

To "bill.wycko@sfgov.org" <bill.wycko@sfgov.org>

cc

Subject Off leash areas for Dogs

01

Please preserve the few off leash areas left in the city for our pets - it's important to us!

Jen

Sent from my iPhone 3GS

Mansbach-1

Larry Mansbach  
582 Market Street, #217  
San Francisco, CA 94104

October 28, 2011

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

RECEIVED  
OCT 31 2011  
CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
M E A

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

Dear Mr. Wycko:

01 [ This letter is written to support the decision to designate the Sharp Park golf course as a "Historical Resource".

You may recognize my name as a former employee of the Planning Department. I am also an avid golfer and enjoy playing at the beautiful Sharp Park course. It is reasonably priced and draws a wide demographic of golfers.

02 [ I am aware that the continued existence of Sharp Park as a golf course faces opposition. I really don't understand why as the golf course and the wildlife can and do coexist. Certainly my planning background influences my thinking that competing land uses for a specific property can be amicably accommodated.

The "Historical Resource" designation will help to preserve Sharp Park as a treasured recreational facility open to the public. That is the way it should be.

Thank you for allowing me to express my views.

Sincerely,

  
Larry Mansbach

Mar-1



**Bill Wycko/CTYPLN/SFGOV**  
10/20/2011 04:30 PM

To Jessica Range/CTYPLN/SFGOV@SFGOV  
cc  
bcc  
Subject Fw: One short weigh-in on the Natural Areas program

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/20/2011 04:30 PM -----



**Glenn Mar**  
<gmar@mediaplex.com>  
10/13/2011 11:03 PM

To "bill.wycko@sfgov.org" <bill.wycko@sfgov.org>  
cc  
Subject One short weigh-in on the Natural Areas program

Sir,

01

From what I've seen, it seems obvious to me that "Maintenance Alternative" is much preferable to a "Maximum Restoration Alternative". I don't see what's inherently better about a "native habitat." We should be going for a natural one, no matter how the plants got here.

-----  
**Glenn Mar – Bernal Heights**

"I'm not concerned about all hell breaking loose, but that a **part** of hell will break loose... it'll be much harder to detect."

- **George Carlin**  
-----

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Thank you.

Masud-1

**From:** [Bill Wycko](#)  
**To:** [Jessica Range](#)  
**Subject:** Fw: Draft EIR on DPA's  
**Date:** 10/04/2011 02:12 PM

---

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/04/2011 02:12 PM -----

**Chuck Masud**  
<[chuck.masud@asm1.com](mailto:chuck.masud@asm1.com)>  
10/04/2011 01:02 PM

To: "bill.wycko@sfgov.org" <[bill.wycko@sfgov.org](mailto:bill.wycko@sfgov.org)>  
cc  
Subject: Draft EIR on DPA's

Mr. Wycko,

01

[ I'd like to express my support for additional restrictions on DPA's and off-leash dog access.

First and foremost, our parks are for people. I for one do not feel inclined to use a park area knowing that it has been repeatedly urinated and defecated on ( even of dog owners " pick up " - you can't pick up urine). If it was homeless people urinating all over, the same dog owners would be appalled but somehow when a dog does it it's different?

I also often feel unsafe as an increasing number of dogs in the parks are large aggressive breeds ( pit bulls, etc).

Finally, I've seen the severe disruption to wildlife caused by off leash dogs in the GGNRA ( I live at Ocean Beach ) and have supported the efforts to restrict off leash dog access there as well.

Thank you for your consideration,

Chuck Masud

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Masud-1

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Mattingly-1



Bill Wycko/CTYPLN/SFGOV

10/31/2011 09:27 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: NAP plan

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:27 AM -----



Judith Mattingly

<jmattingly@matharch.com>

10/29/2011 12:19 PM

Please respond to  
jmattingly@matharch.com

To bill.wycko@sfgov.org

cc

Subject NAP plan

Dear Mr. Wycko,

I have been reading about the Natural Areas Program, and am very concerned about what I understand is happening.

01

Planting 'native' plants that then mostly die due to lack of maintenance suggests that the 'native' plants are no longer viable in the current San Francisco area climate. With climate change, plants better suited to this area seem like better options than trying to restore plants that may have been native hundreds of years ago.

02

I was also extremely concerned to read that Rec and Park is using pesticides to kill 'non-native' plants as part of the so-called restoration project. Since I like to use many of the City parks like McClaren and Glen Park with my family and dogs, I am now very worried about exposure to dangerous toxins. This is beyond reprehensible! How dare you risk the health of our citizens in order to maintain poor plant choices - all of which is being done at my (taxpayer) expense!

03

I am also very unhappy to hear that you plan to cut down scores of healthy 'non-native' trees with a desire to create a more open scrub bush and grassland environment. I understand many species have adapted to the more forested environment, including some endangered species. This seems like a very rash idea that could have unexpected domino effects. Has anyone studied any of the repercussions?

I vote no to this plan.  
thank you,  
Judith Mattingly  
--

McAllister-1

**From:** Mary McAllister  
**To:** [Jessica.Range@sfgov.org](mailto:Jessica.Range@sfgov.org)  
**Subject:** Re: Question about the Draft EIR for the Natural Areas Program  
**Date:** 09/22/2011 08:18 AM

Ms. Range,

01 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.

02 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

----- Original Message -----

From: <[Jessica.Range@sfgov.org](mailto:Jessica.Range@sfgov.org)>  
 To: "Mary McAllister" <[marymcallister@comcast.net](mailto:marymcallister@comcast.net)>  
 Cc: <[john.bock@tetratech.com](mailto:john.bock@tetratech.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  
 > 1650 Mission Street, Suite 400  
 > San Francisco, CA 94103  
 > Phone: (415) 575-9018 / Fax: (415) 558-6409  
 > [www.sfplanning.org](http://www.sfplanning.org)

>	"Mary McAllister"		
>	< <a href="mailto:marymcallister@comcast.net">marymcallister@comcast.net</a> >		To
>		"Jessica Range"	
>	09/21/2011 01:26 PM	< <a href="mailto:Jessica.Range@sfgov.org">Jessica.Range@sfgov.org</a> >	cc
>			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

McAllister-1

```
> 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 the DEIR.
> Mary McAllister
```

McAllister-2

Public Comment  
Draft Environmental Impact Report for the Natural Resource Areas Management Plan  
RE: 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 Suto 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 Suto Management Plan" was written by UCSF and is available on their website. It describes "native" Mount Suto as follows: "In the 1800s, like most of San Francisco's hills, Mount Parnassus [now known as Mount Suto] was covered predominantly with coastal scrub chapparal [sic], consisting of native grasses, wildflowers, and shrubs..." (page 4) (emphasis added)

A Natural History of California<sup>1</sup> 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)

<sup>1</sup> 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 website<sup>2</sup>. 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.<sup>3</sup> 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."<sup>4</sup> 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.

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 fires in the Oakland hills in the 20<sup>th</sup> century. Each followed a hard winter causing vegetation to die back.

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.<sup>5</sup>

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.<sup>6</sup> 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 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**

<sup>2</sup> [http://www.cnps-verbabuena.org/experience/other\\_articles.html#pageTop](http://www.cnps-verbabuena.org/experience/other_articles.html#pageTop)

<sup>3</sup> "Rains expected to help heal Angel Island," SF Chronicle, October 14, 2008

<sup>4</sup> "After fire, Angel Island is a park of contrasts," SF Chronicle, October 15, 2008

<sup>5</sup> FEMA Technical Report on 1991 Oakland Fire, <http://www.usfa.dhs.gov/downloads/pdf/publications/tr-060.pdf>

<sup>6</sup> Gilliam, Harold, *The Weather of the San Francisco Bay Area*, UC Press, 2002

McAllister-2

01  
(Cont.)

**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.”<sup>7</sup>

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.”<sup>8</sup> 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%.<sup>9</sup> 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.**<sup>10</sup>

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.<sup>11</sup> Destroying a non-native forest in order to create a native landscape of grassland and scrub will not make us safer.

## 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)

02

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.<sup>12</sup> 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.

<sup>7</sup> <http://www.firescape.us/coastliveoaks.pdf>

<sup>8</sup> 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.

<sup>9</sup> <http://www.ansci.cornell.edu/plants/medicinal/eucalyp.html>

<sup>10</sup> <http://www.paleotechnics.com/Articles/Bayarticle.html>

<sup>11</sup> Sugihara, Neil, *Fire in California's Ecosystems*, UC Press, 2006

<sup>12</sup> 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.

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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 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.<sup>13</sup> **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."

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
  - 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.<sup>14</sup> **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 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 (see Attachment B). 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.<sup>15</sup>

<sup>13</sup> 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

<sup>14</sup> Gould, J.S., et. al., Project Vesta: Fire in Dry Eucalyptus Forests, Commonwealth Scientific and Industrial Research Organisation and Department of Environment and Conservation, Western Australia, November 2007

<sup>15</sup> Fimrite, Peter, "Sudden oak death cases jump, spread in the Bay Areas," San Francisco Chronicle, October 2, 2011



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### 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.**

Mary McAllister  
[marymcallister@comcast.net](mailto:marymcallister@comcast.net)

October 26, 2011

McAllister-2

Attachment B

**Excerpt from Public Comment**  
**Draft Environmental Impact Report for the Natural Resource Areas Management Plan**  
**RE: Environmental Impact of Destroying Trees**

**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:**

- 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 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.
- 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”

McAllister-2

03

- 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."
- 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.

Mary McAllister

October 24, 2011

McAllister-3

**Public Comment**  
**Draft Environmental Impact Report for Natural Resource Areas Management Plan**  
**RE: 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 several 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 these tree removals will not result in the loss of carbon stored in the urban forest

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

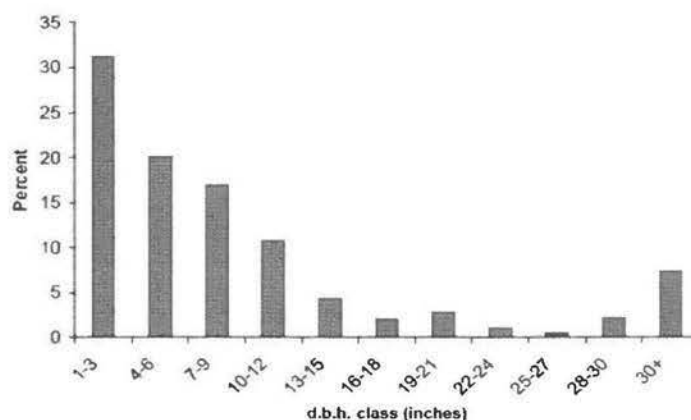
- Contradicted by the horticultural requirements of trees native to San Francisco
- Contradicted by the actual plans as documented by SNRAMP
- Contradicted by the actual health status of the existing forest
- Contradicted by the actual past practices of the Natural Areas Program with respect to tree removals
- Contradicted by 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)

McAllister-3



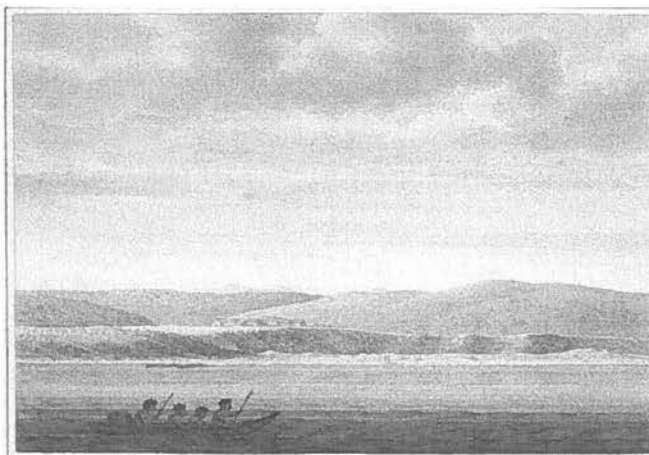
Size of trees in San Francisco's Urban Forest, US Forest Service Survey

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 19<sup>th</sup> 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

McAllister-3

**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, where native trees have been planted by the Natural Areas Program (NAP) to placate neighbors who objected to the removal of the trees in their neighborhood parks, the trees did not survive. (see page 6 for details)

**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

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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."<sup>1</sup>

## 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:**

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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 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.
- 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.

<sup>1</sup> Fimrite, Peter, "Sudden oak death cases jump, spread in the Bay Areas," San Francisco Chronicle, October 2, 2011



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(Cont.)**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."
- 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.**



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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

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- 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 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

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- Many trees that were more easily cut down without heavy equipment were simply destroyed, sometimes leaving ugly stumps several feet off the ground.

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Stumps of small trees destroyed on Bayview Hill, 2002

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- 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.



Tank Hill, 2002

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- 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.



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West end of Pine Lake, July 2011

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- 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.



Interior Greenbelt, 2010

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**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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### 3. The 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 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 (CO<sub>2</sub>) 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 study<sup>2</sup>)*

**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:**

<sup>2</sup> Jha, Alok. 2006. The Guardian. "Planting Trees to Save Planet is Pointless, Say Ecologists." Friday, December 15, 2006.

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- 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.

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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:

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*"Research studies have concluded that grassland and scrub habitat could act as a significant carbon sink." (DEIR, page 457, cited studies<sup>3</sup>)*

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**

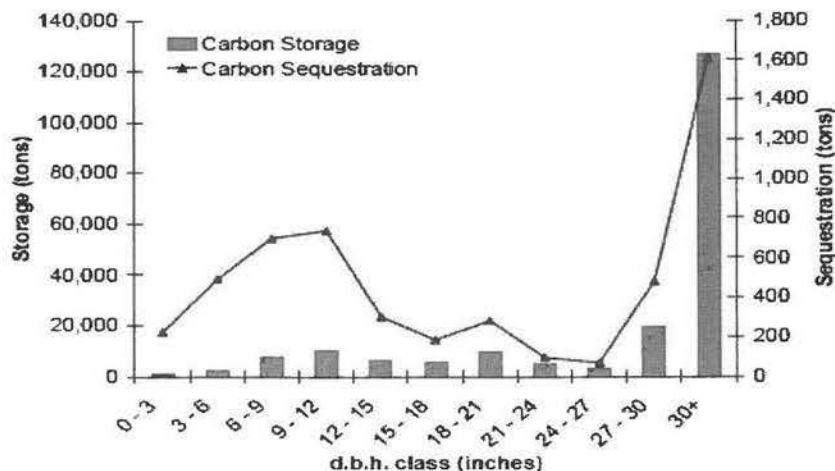
The DEIR claims that because a young tree, growing at a faster rate than a mature tree, sequesters carbon at a faster rate than a mature tree, it follows that replacing mature trees with young trees will result in a net carbon benefit. This is NOT a logical conclusion, as illustrated by this graph from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

<sup>3</sup>Conant, 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

Hu, S., Chapin, Firestone, Field, Chiariello. 2001. "Nitrogen limitation of microbial decomposition in a grassland under elevated CO<sub>2</sub>," *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).

Even IF it were possible to 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. 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) 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)

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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 CO<sub>2</sub> emission rates for all equipment deliveries, and worker activity involving on-road and off-road gasoline and diesel fuel use." (DEIR, page 455). The CO<sub>2</sub> 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.

### 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.
- 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 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.**

Karin Hu, [brainz\\_ca@yahoo.com](mailto:brainz_ca@yahoo.com)

Mary McAllister, [marymcallister@comcast.net](mailto:marymcallister@comcast.net)

October 24, 2011



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## Public Comment

## Draft Environmental Impact Report for the Natural Resource Areas Management Plan

## RE: 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 claims that herbicide applications by the Natural Areas Program comply with San Francisco's 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.
3. The DEIR misstates the facts about the toxicity of the herbicides being used by the Natural Areas Program
4. 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 A):

Number of pesticide applications by the Natural Areas Program

Active Ingredient	2008	2009	2010	Percent Increase
Triclopyr (Garlon)	17	16	36	
Glyphosate (Roundup)	7	6	31	
Aminopyralid/Imazapyr (Milestone/Habitat)	2	2	2	
Total	26	24	69	265%

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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 eight years old and pesticide use by the Natural Areas Program is increasing significantly from year to year, 265% in the past three years alone.

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 in all three 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 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 in all three years for which we have data.

## 2. 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:

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- 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:
  - 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 A)

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05  
(Cont.)

- 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 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.

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### 3. 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:

*"[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 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)

*"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.

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**4. 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.

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 which it predicts must be done twice per year for 10 years. (See Attachment 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 C)

**Conclusion**

**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.**

**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.**

Karin Hu, [brainz\\_ca@yahoo.com](mailto:brainz_ca@yahoo.com)

Mary McAllister, [marymcallister@comcast.net](mailto:marymcallister@comcast.net)

October 24, 2011

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Attachment A

APPLICANT NUMBER	APPLICANT COMMENTS	PESTICIDE	Amount Used	Label	TARGET PEST	EPA Number	HOW APPLIED	APPLICATOR	DATE OF APPLICATION	DATE OF NOTIFICATION	SITE MANAGER	NOTIFIER
<b>GARLON</b>												
17642	Monocot city	GARLON 4	2	fl ozs	broadleaf weeds	62719-40-28-62719	Spray	DE MEO, LOA	15-Jan-08			
17643	Pison Oak / Oaks	GARLON 4	2	fl ozs	broadleaf weeds	62719-40-28-62719	Spray	HAYES, DYLAN	15-Jan-08			
17698	pine hills	GARLON 4	18	fl ozs	oaks	62719-40-28-62719	Spray	HAYES, DYLAN	14-Feb-08			
17700	bayview hill	GARLON 4	13.2	fl ozs	oaks	62719-40-28-62719	Spray	HAYES, DYLAN	28-Feb-08			
17701	hill	GARLON 4	5.4	fl ozs	oaks	62719-40-28-62719	Spray	HAYES, DYLAN	28-Feb-08			
17791	east grassland	GARLON 4	8	fl ozs	oaks	62719-40-28-62719	Spray	ZEBELL, RANDOLPH (RANDY)	6-Mar-08			
17792	hill peaks	GARLON 4	21.6	fl ozs	oaks	62719-40-28-62719	Spray	CAMPBELL, CHRISTOPHER	6-Mar-08			
17793	mt. Davidson	GARLON 4	18	fl ozs	oaks	62719-40-28-62719	Spray	CAMPBELL, CHRISTOPHER	8-Mar-08			
17794	Glen canyon	GARLON 4	10	fl ozs	oaks	62719-40-28-62719	Spray	ZEBELL, RANDOLPH (RANDY)	7-Mar-08			
17863	Mc Laren, Quail run	GARLON 4	10	fl ozs	oaks-burdock	62719-40-28-62719	Spray	DE MEO, LOA	13-Jun-08			
18121	Mc Davidson	GARLON 4 ULTRA	7.5	fl ozs	weeds	62719-527	Spray	ANNESSE, THOMAS (TOM)	1-Oct-08		Lisa Wayne	
18122	Mc Davidson	GARLON 4 ULTRA	10	fl ozs	stump treatment	62719-527	Spray		7-Oct-08		Lisa Wayne	
18123	sharp park	GARLON 4 ULTRA	30	fl ozs	stump treatment	62719-527	Spray		22-Oct-08		Lisa Wayne	
18124	sharp park	GARLON 4 ULTRA	12	fl ozs	stump treatment	62719-527	Spray		28-Oct-08		Lisa Wayne	
18125	golf course	GARLON 4 ULTRA	12	fl ozs	stump treatment	62719-527	Spray		30-Oct-08		Lisa Wayne	
18190		GARLON 4 ULTRA	14	fl ozs	eucalyptus saplings	62719-527	Spray		25-Nov-08		Lisa Wayne	
		TOTAL GARLON 2008	179.5									
18242	oaks	GARLON 4 ULTRA	2	fl ozs	weeds	62719-527	Spray		30-Jan-09		LISA WAYNE	
18273	Brooks park, Orinaba rocks	GARLON 4 ULTRA	4.8	fl ozs	oaks	62719-527	Spray		4-Feb-09		LISA WAYNE	
18274		GARLON 4 ULTRA	4.8	fl ozs	oaks	62719-527	Spray		10-Feb-09		LISA WAYNE	
18275	BAYVIEW HILL	GARLON 4 ULTRA	28.5	fl ozs	oaks	62719-527	Spray		19-Feb-09		LISA WAYNE and KIRRA SWENERTO	
18276	Corona	GARLON 4 ULTRA	9.6	fl ozs	oaks	62719-527	Spray		27-Feb-09		LISA WAYNE	
18329	twinn peaks	GARLON 4 ULTRA	3.6	fl ozs	oaks	62719-527	Spray		5-Mar-09		Lisa Wayne	
18330	Glen Canyon	GARLON 4 ULTRA	5	fl ozs	poison oak	62719-527	Spray		12-Mar-09		Lisa Wayne	
18331	Glen Canyon	GARLON 4 ULTRA	3	fl ozs	OVALIS	62719-527	Spray		13-Mar-09		Lisa Wayne	
18332	Glen Canyon - above	GARLON 4 ULTRA	3	fl ozs	OVALIS	62719-527	Spray		19-Mar-09		Lisa Wayne	
18333	bayview hill	GARLON 4 ULTRA	5.5	fl ozs	OVALIS / insecticide	62719-527	Spray		23-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	McLaren	GARLON 4 ULTRA	6	fl ozs	broadleaf weeds	62719-527	Spray		20-Aug-09		Lisa Wayne	
18553	McLaren	GARLON 4 ULTRA	3	fl ozs	fennel	62719-527	Dauber		1-Oct-09		Lisa Wayne	
18584		GARLON 4 ULTRA	3	fl ozs	fennel	62719-527	Dauber		1-Oct-09		Lisa Wayne	
		TOTAL GARLON 2009	108.2									
18657	Mc Davidson	Garlon	2	fl ozs	oaks - grasslands	627-1940	Backpack	Lisa Wayne	3-Feb-10		10,000 sq ft	
18729	Twin Peaks	Garlon	19	fl ozs	oaks	627-1940	Backpack	Jan Campos, Kira Swenertor	18-Mar-10			
18726	Twin Peaks	Garlon 4	10.5	fl ozs	N & S peak, south garden, top of	62719529	Backpack	Kira Swenertor	4-Mar-10			
18727	Twin Peaks	Garlon 4	7.2	fl ozs	Mission bowl	62719529	Backpack	Kira Swenertor	17-Mar-10			
18730	Mc Davidson	Garlon 4 Ultra	9	fl ozs	Mission ridge & bowl, oaks	62719529	Backpack	Kira Swenertor	15-Mar-10			
18731	Mc Davidson	Garlon 4 Ultra	3.6	fl ozs	Mc Davidson / Cape Ivy	62719529	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	oaks	62719-527	Backpack	illeg	17-Mar-10	
18734	Mc Davidson	Garlon 4 Ultra	3.6	fl ozs	oaks	62719-527	Backpack		18-Mar-10	
18728	Grandview	Garlon 4 Ultra	3.6	fl ozs	oaks narrow leaf replant	62719-527	Backpack	Kira Swenerton	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, del Valle to Malta	62719-527	Backpack	Zebell	8-Apr-10	
	Glen Canyon Fox meadow, patch, hemlock patch	Garlon 4 Ultra	12.5	fl ozs		62719-527	Backpack	DeMelo Swenerton	8-Apr-10	
	Glen Canyon Fox meadow	Garlon 4 Ultra	5	fl ozs	Poison oak, broom, english ivy, hemlock	62719-527	Backpack	DeMelo L	22-Apr-10	
	O'Shaughnessy	Garlon 4 Ultra	3	fl ozs	Sabiosa	62719-527	Backpack	Campbell, Chris	22-Apr-10	
	Twin Peaks	Garlon 4 Ultra	3.6	fl ozs	Fennel along Burnett	62719-527	Backpack	(Shatterbell) Garcia Wilson	26-Apr-10	0.5 acres
	Twin Peaks	Garlon 4 Ultra	9	fl ozs	Cotoneaster (stump treatment)	62719-527	Backpack		26-Apr-10	0.25 acres
	Oak Woods (SGP)	Garlon 4 Ultra	4.5	fl ozs	Colostrum/mayfield site of heaven	62719-527	Backpack	(Shatterbell) Garcia Wilson	30-Apr-10	0.5 acres
	Twin Peaks	Garlon 4 Ultra	8	fl ozs	Cotoneaster	62719-527	Backpack	(Shatterbell) Garcia Wilson	30-Apr-10	
	McLaren	Garlon 4 Ultra	8	fl ozs	Gazania and fennel	62719-527	Backpack	K Swenerton	19-May-10	
	McLaren - University Hill	Garlon 4 Ultra	3.6	fl ozs	Above asphalt path at University and Wootley fennel	62719-0537	Backpack sprayer	Lisa De Mello	17-Jun-10	
	McLaren - Inghizala (7) area	Garlon 4 Ultra	15	fl ozs	Gazania and fennel between 2 paths	62719-0537	Backpack sprayer	Lee Wayne	17-Jun-10	
	McLaren	Garlon 4 Ultra	9	fl ozs	Fennel - south of Mansell, east of Vistacon	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	62719-540	Dauber stump treatment	K Swenerton	16-Sep-10	
	McLaren (Gevens)	Garlon 4 Ultra	1	fl ozs	Geneva Ridge fennel	62719-540	Dauber (cut and daub)	Dylan Hayes	13-Oct-10	
	Twin Peaks	Garlon 4 Ultra + spraytech oil	15	fl ozs	Posion 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 Harrower	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, Shelle Prescott	21-Oct-10	
	Glen Park	Garlon 4 Ultra + Spraytech oil	27	fl ozs	Monocot Dry French Broom, Cotoneaster	62719-527	Cut stump	Paul Wilson, Shelle Prescott	22-Oct-10	
	RPD-Glen Park Natural Areas	Garlon 4UL	1	fl ozs	Weeds misc	62719-527		Hayes, D	4-Nov-10	
	RPD-Glen Park-Sec 2	Garlon 4UL	4	fl ozs	Weeds-misc	62719-527		Hayes, D	12-Nov-10	
	RPD-Twin Peaks	Garlon 4UL	8	fl ozs	Weeds-misc	62719-527		Gerlach, Ryan	24-Nov-10	
	RPD-Twin Peaks	Garlon 4UL	10	fl ozs	Weeds-misc	62719-527		Garcia, Shelle Beth	18-Dec-10	
		Total Garlon 2010	340.169							
ROUNDUP										
17698	landscaping	ROUNDUP PRO DRY	1.8	ozs	cape ivy	524-505	Spray	HAYES, DYLAN	14-Feb-08	
17767	twin peaks - emarta west grassland	ROUNDUP PRODRY	4	ozs	arctostaphylos	524-505	Spray	DE MEO, LUCIA	7-Mar-08	
17768	brooks	ROUNDUP PRODRY	9.8	ozs	weeds	524-505	Spray	HAYES, DYLAN	11-Mar-08	
17769	Edgehill - emarta	ROUNDUP PRODRY	8	ozs	weeds	524-505	Spray	ZEBELL, RANDOLPH (RANDY)	20-Mar-08	
17770	Brooks - emarta	ROUNDUP PRODRY	4.9	ozs	weeds	524-505	Spray	HAYES, DYLAN	20-Mar-08	
17862		ROUNDUP PRO HERBICIDE	2	fl ozs	sumps	524-475-ZA-524	Spray	ANNESSE, THOMAS (TOM)	13-Jun-08	
17766	McLaren marsh area	RODEO AQUATIC HERBICIDE (Glyphosate, Dow)	2.6	fl ozs	arctostaphylos	524-343-AA-524	Spray	DE MEO, LUCIA	7-Mar-08	

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**Mary McAllister**

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**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 3<sup>rd</sup> 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 25<sup>th</sup> 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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**NOTICE**  
**PESTICIDE APPLICATION**

San Francisco has reduced its pesticide use by almost 80% since our Integrated Pest Management (IPM) Program began. Our IPM Ordinance requires that problems with pests such as weeds, rodents, or insects on City properties be solved using lower risk methods. Where pesticides must be used, only low-toxic products reviewed by the Department of the Environment are permitted.

PESTICIDE USE: ☒ PREVENTION ☒ MECHANICAL/BIOLOGICAL ☒ CHEMICAL/HAZARDOUS PESTICIDES AS A LAST RESORT

Target Pest: Oxalis pes-caprae  
 Other Action Attempted: mechanical control  
 Area Treated: peaks, east & south slopes below road  
 Pesticide Material: garlon 4 ultra  
 Active Ingredients: Triclopyr

Signal Word: CAUTION / WARNING / DANGER  
 EPA Number: 62719-527 (NAB)  
 Re-Entry Period: when dry - 2 hrs  
 Integrated Pest Management Contact: 415-831-6512

Date/Time of Application: Between 2/3/11 & 2/10/11  
 Sprayed: 2/3/11 8:00 AM  
 Date Completed: 2/4/11 Spring Personnel Unit

For more information on the IPM Integrated Pest Management Program, or to submit complaints of improper pesticide use, see: [www.sfdirect.com/ipm/ipm.htm](http://www.sfdirect.com/ipm/ipm.htm)

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Attachment 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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**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	<b>Lower:</b> No test data available <b>Upper:</b> 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 (H <sub>2</sub> O = 1)	1.08 <i>Literature</i> <i>Pyknometer</i>
Liquid Density	1.09 g/cm <sup>3</sup> <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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|| LC50, 4 h, Aerosol, Rat, male and female &gt; 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 &gt; 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 &gt; 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 &gt; 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 &lt; 100 or Log Pow &lt; 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 &gt; 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 Toxicity**LC50, 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**

<b>NFPA</b>	<b>Health</b>	<b>Fire</b>	<b>Reactivity</b>
	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

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
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.

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## 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:

February 15, 2005

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

RE: Preferential Option on Fire 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 black oak scrubby trees, with an understory of smaller, native (Toy, Oak, Maple) and various shrubs, forbs and grasses. The project will involve the removal of the scrubby trees and the retention of the remaining plant coverage. Ongoing maintenance for the next ten years is to ensure that the scrubby trees do not re-grow (supplies) from cut stumps and to ensure that any seedlings from the latest seed stock are removed on a continuing basis, until the latest 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 the terrain and stand density, and assuming an annual treatment effectiveness during falling 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 \$49.25/hr. Based on using a mixture of Triclopyr and Imazapyr in kerosene oil, I would allow for \$25 per acre per year in material costs. To account for planning, reporting, application prescriptions and supervision, I've prepared an allowance of \$4000/site/year.

Please refer to the below chart for life cycle costing.

Project Site	Acreage	Labor (\$/hr/yr)	Management	Material (\$/yr)	Total (\$/yr)
Strawberry Canyon	66 Acres	\$ 9830	4000	\$1620	\$ 15450
Claremont Canyon	45 Acres	\$ 6716	4000	\$ 1125	\$ 11841

Sincerely,

Robert Costa, Assoc. Director  
PP-CIS Specialist

BCA Data Documentation 3.doc

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Attachment D

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**Public Comment****Draft Environmental Impact Report for the Natural Resource Areas Management Plan****RE: Support for the Maintenance Alternative**

The Significant Natural Resource Areas Management Plan (SNRAMP) which is evaluated by the Draft Environmental Impact Report (DEIR) identifies the Maintenance Alternative as the Environmentally Superior Alternative.<sup>1</sup> 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.

My 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

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. I documented that destruction (because the trees were not posted as required by department policy) by testifying to the Recreation and Park Commission and submitting the attached letter on May 4, 2004. (see Attachment A) My testimony is also recorded in the minutes of that meeting.

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:

<sup>1</sup> 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

08  
(Cont.)

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 in Glen Canyon Park that has been sprayed with toxic Garlon numerous times. There is no evidence that the oxalis has been defeated by this chemical warfare.

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Oxalis in Glen Canyon Park, February 2011

According to "UC [Davis] IPM Online"<sup>2</sup>, 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.

08  
(Cont.)

## 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 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 would like the public and the City's policy makers to believe that its lack of success is because they are not adequately funded.

<sup>2</sup> <http://www.ipm.ucdavis.edu/PMG/PESTNOTES/pn7444.html>

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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.<sup>3</sup>

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.<sup>4</sup>

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. 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.<sup>5</sup>), 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.

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:

<sup>3</sup> [http://www.calacademy.org/academy/building/the\\_living\\_roof/](http://www.calacademy.org/academy/building/the_living_roof/)

<sup>4</sup> <http://www.calacademy.org/pdfs/living-roof-project-results.pdf>.

<sup>5</sup> “High Maintenance Superstar,” Linda McIntyre, *Landscape Architecture*, August 2009.



McAllister-3

08  
(Cont.)

**"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."<sup>6</sup>

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

**The Maintenance Alternative is the only viable alternative going forward.**

- **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, and public safety will not result in sustainable native plant gardens.**

Mary McAllister  
marymcallister@comcast.net

October 24, 2011

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<sup>6</sup> "Spontaneous Urban Vegetation: Reflections of Change in a Globalized World," Nature and Culture. Winter 2010, 209-315.

McAllister-3

Attachment A

Mary McAllister, 2484 21<sup>st</sup> Ave., San Francisco, CA 94116

May 4, 2004

Commissioner John Murray  
Recreation and Park Commission  
City and County of San Francisco

RE: Forest Assessment for Stern Grove/Pine Lake Park

Dear Commissioner Murray:

The staff of the Recreation and Park Department has destroyed and/or mutilated many healthy trees (see attached photos) at the western end of Pine Lake Park recently, compromising the windbreak for this heavily forested park of aging trees. Therefore, I am writing to ask that a complete wind study be conducted to determine the impact of the massive tree destruction proposed by the forest assessment that you will consider for approval.

In brief, the tree assessment proposes the following tree removals for this park:

- Removal of 550 hazardous trees (15% of all trees)
- Reduction of overall density of the forest by 50%
- Removal of healthy eucalyptus in several selected areas

I requested only one revision of the proposed plans. I asked that healthy trees not be removed from the western end of Pine Lake Park. This park is essentially a wind tunnel, a windward facing, upward sloping canyon that accelerates the wind. I asked that the windbreak be preserved to the extent possible, i.e., that healthy trees not be removed. Although I spent 6 months negotiating in support of this small request, I was only successful because I appealed to my District Supervisor who in turn asked the Stern Grove Festival Association for their support. The report was finally changed at the request of the Festival Association.

This proved an empty victory. While I was negotiating for the revision of the report, the Natural Areas Program was expanding their native plant garden into the western end of the park in which natives had not previously existed. As you may know, the plants that are native to San Francisco are not shade tolerant. Therefore the trees in this new native plant reserve were destroyed and the surrounding trees were limbed up approximately 50 feet to the canopy. Furthermore, the trees that were destroyed were not posted 30 days in advance, as required by law (Park Code 3.19).

If massive tree failure occurs in this park, resulting in the destruction of property or life, the Recreation and Park Department will be liable for compensation because there is substantial public record that these failures were predicted and could have been avoided by responsible preventive measures. Please note that there are 360 acres of non-native trees in the so-called "natural areas". They are all in jeopardy of being destroyed.

Sincerely,  
Mary McAllister

McAllister-3

## Public Comment

## Draft Environmental Impact Report for Natural Resource Areas Management Plan

## RE: 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 Plant (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

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 my 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 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" have the least negative impact on the environment of all proposed alternatives:

McAllister-3

**"§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.

09  
(Cont.)

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."*<sup>1</sup> 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, recreational access restrictions, and the planting of endangered plants and animals that could potentially require further access restrictions.

## 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 6<sup>th</sup>. Shortly before the hearing, the starting time was moved up to noon.

10

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 13<sup>th</sup> item would be heard. Many naturally assumed that it would not be at the beginning of the hearing. They were wrong.

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

<sup>1</sup> Webster's Collegiate Dictionary, Random House, 1991

McAllister-3

10  
(Cont.) { 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

11 { The President of the Planning Commission requested at the public hearing on October 6<sup>th</sup> that the deadline for written public comments be extended to October 31<sup>st</sup>. No effort was made to inform the public of this extension of the deadline. I asked (in writing) the Planning Department to inform any member of the public that had been informed of the original deadline of October 17<sup>th</sup> of this extension. That request was refused.

I have been following the destructive native plant restorations in the San Francisco Bay Area for 15 years. I have therefore received several EIRs and EISs for public comment. When there were extensions of the comment deadline, I received written notification of that extension. Based on that experience, I believe it is standard practice to notify members of the public who have expressed an interest in an EIR/EIS of an extension of deadlines.

Such refusal to provide the public with notification of the extension of the deadline will further compromise the public review process.

### Conclusion

09  
(Cont) { **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**
- **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**

11  
(Cont) { **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.**

**Mary McAllister**  
**[marymcallister@comcast.net](mailto:marymcallister@comcast.net)**

**October 24, 2011**



McAllister-3

Attachment A

----- Original Message -----

From: <[Jessica.Range@sfgov.org](mailto:Jessica.Range@sfgov.org)>

To: "Mary McAllister" <[marymcallister@comcast.net](mailto: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](http://www.sfplanning.org)

"Mary McAllister" [marymcallister@comcast.net](mailto:marymcallister@comcast.net)

To [Jessica.Range@sfgov.org](mailto: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

McAllister-3

----- 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

1650 Mission Street, Suite 400

San Francisco, CA 94103

Phone: (415) 575-9018 / Fax: (415) 558-6409

[www.sfplanning.org](http://www.sfplanning.org)

"Mary McAllister" [marymcallister@comcast.net](mailto:marymcallister@comcast.net)

To "Jessica Range"

09/21/2011 01:26 PM

[Jessica.Range@sfgov.org](mailto: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?

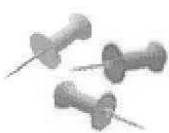
Page 2: "The Maximum Restoration Alternative is the Environmentally Superior Alternative."

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

McCalla-1

**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 09:12 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: Please keep dog play areas open!

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:12 AM -----

**Kim McCalla**

&lt;kimmccalla@gmail.com&gt;

10/31/2011 07:17 AM

To bill.wycko@sfgov.org

cc

Subject Please keep dog play areas open!

Dr. Mr. Wycko,

The risk of losing a significant amount of dog play areas is very troubling to me. My quality of life, as well as my dogs, is made so much richer with the current open spaces for which I can explore with my dog. In fact, I held off on rescuing a dog for 10 years; until I was able to buy a home of my own. And it wasn't until then that I felt secure and responsible enough to get a dog...which I did 4 years ago. Since then, I have seen so much more of this beautiful city, and the surrounding bay area, because of the adventures we take every weekend. It truly is a wonderful thing to take a walk/hike/run in this wonderful area with your furry friend.

Without the ability to explore these areas with my dog, off leash, I guarantee that I would never have visited most of them. I am one of the many, many, RESPONSIBLE people who have CONTROL over their dog(s), RESPECT the environment we are in, and routinely enjoy these areas.

I implore you to not support a plan that will reduce the amount of off leash dog areas in this city and its surroundings. When you consider the sheer number of active dog owners in the bay area you quickly realize that the existing off leash open space areas are already at a minimum. One visit to Fort Funston or Crissy Field on any given weekend day (or week day, for that matter) will give you an idea of the massive volume of dogs that enjoy it. Reducing these types of areas will force other areas to become dangerously crowded.

Another group of people who will be severely impacted are the dog walkers. What do you think will happen to these professionals when their "office" is reduced so drastically?

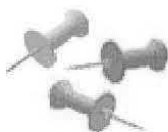
I speak from experience when I say that the number of ill mannered dogs and, hence, ill mannered dog owners, are the minority. And I wish for there to be consequences for those folks.

Perhaps the threat of fines could be introduced to discourage bad behavior (people who let their dogs out of their site, bring *overly* aggressive dogs, do not pick up their dogs waste, etc).

Thanks you for your time to read my concerns,

Kim McCalla

McGinnis-1



**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 09:28 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: NAP EIR comment

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:29 AM -----



**Paula McGinnis**

**<pmcginni111@comcast.net>**

10/28/2011 06:12 PM

To bill.wycko@sfgov.org

cc

Subject NAP EIR comment

01

Dear Mr. Wyco,

I oppose the closure of any off-leash dog-friendly park. As a recently retired senior citizen, I am especially interested in keeping (even creating) areas where I can walk for exercise along with my off-leash dog, in contrast to small fenced areas. As the population ages, accessible (i.e. flat enough to walk comfortably) areas for activities become more and more important. Although I do not live in San Francisco, I often visit a resident friend in order to walk together with our dogs. Please do not close any off-leash parks unless scientific studies show that there are significant negative impacts, and don't forget to include the environmental impact created by forcing people to drive farther to get to a park.

Sincerely,

Paula McGinnis

Berkeley, CA

Miller-E-1



**Chelsea  
Fordham/CTYPLN/SFGOV**  
10/28/2011 11:03 AM

To: Jessica Range/CTYPLN/SFGOV@SFGOV, Sarah B  
Jones/CTYPLN/SFGOV@SFGOV  
cc:  
bcc:  
Subject: Fw: Glen Canyon Park

— Forwarded by Lisa Gibson/CTYPLN/SFGOV on 10/26/2011 10:41 AM —



**Bill Wycko/CTYPLN/SFGOV**  
10/25/2011 01:14 PM

To: Lisa Gibson/CTYPLN/SFGOV@SFGOV, Jon  
Swae/CTYPLN/SFGOV@SFGOV  
cc:  
Subject: Fw: Glen Canyon Park

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/25/2011 01:14 PM —



**"eric" <emiller1@gmail.com>**  
10/25/2011 01:08 PM

To: <bill.wycko@sfgov.org>  
cc:  
Subject: Glen Canyon Park

Dear Mr. Wycko,

01

As a Glen Park resident, homeowner, and parent I am horrified at many of the key elements planned by your department for Glen Canyon Park. As I read the impact report your department published I am appalled at the surrealistic objectives you and your fellow bureaucrats have established for the park. Your plan is the apex of SF governmental absurdity - in the midst of the starkest economic crisis since the Great Depression, massive SF budget deficits, reduction in essential services, and cuts in programs for our children you are going to spend our taxes to chop down 120 beautiful Eucalyptus trees and an unspecified number of Willow trees, close "social trails," deny access to rocks my kids like to climb, make "pools inaccessible to the public," so you can plant "native" grasses, reintroduce a damselfly, and install larval host plants, etc.?!? It seems you feel Glen Canyon Park is your department's petri dish instead of a city park? Your plans have been challenged as absurd and misguided by a Distinguished Professor of Evolution and Ecology at UC Davis and other well informed scientists, ecologists, and citizens and yet you will proceed?

It seems your plan and your attitude, if not the very existence of your job (SF could probably better benefit from an extra fireman or policeman) are a clear example of local government gone wrong. The vast majority of Glen Park citizens are not aware of your plans to waste tax revenue on what can be best described as a misguided micro-ecology experiment on our park. The group of parents whose children play in the park are unaware of your specific plans - I have no doubt they anticipate an rational improvement of the park and playground. A chance encounter with a local ecologist is the only reason I'm aware of your plan - with the deadline for final commentary looming it seems you may get your way.

Miller-E-1

If you proceed with this buffoonery I will take it upon myself to go door-to-door in Glen Park, canvass the annual GP festival, work the parent Montessori and soccer team network, gather petition signatures, and conduct whatever other civic action is necessary to ensure the political hack who oversees your department is never elected again. If it is possible to float a petition to defund your obviously out-of-control department I will do that as well.

My natural bias is to trust my local government to make sound choices and establish rational priorities – your plan has violated that trust.

Sincerely,

Eric Miller

Miller-E-2

**From:** eric <emiller1@gmail.com>  
**Sent:** Wednesday, May 23, 2012 9:22 PM  
**To:** Wider, Lori  
**Cc:** Wycko, Bill; Range, Jessica  
**Subject:** RE: Significant Natural Resource Areas Management Plan Draft EIR

Dear Ms. Wider -

Given that we have limited time before the current comment period expires, we would like to focus the City's attention on the big picture. The bottom line is that the City has failed to address our due process concerns. Our review of City requirements was meant to be illustrative, not exhaustive, and to emphasize that where significant private property interests are at stake (e.g., where construction or tree removal is planned on neighboring properties), notice to affected residents is required. This notice is required not only by local law, but also as a matter of constitutional law. In our initial letter, we offered examples of concrete ways in which San Francisco property owners will be impacted by the City's proposed project. There may be other impacts not detailed in our letter. For multiple legal reasons, we believe the City is obligated, in light of the magnitude of the project and the severity of the impacts, to notify city residents (especially affected property owners and park users) about the project with sufficient time to allow them to be involved in decision making.

We understand from your recent responses that you are unwilling to: (1) modify the April 27th notice to more clearly set forth the impacts of the proposed project; (2) notify property owners within 150 feet of affected parks; (2) post notice in and near the affected parks; (4) hold a public hearing on the project; or (5) or extend the notice period beyond June 11th.

We believe your response is deficient and we are considering our political and legal options in this regard. In the meantime, we would like to request that the City provide us with a list of property addresses located within 150 feet of affected parks, so that we can attempt to contact such property owners ourselves prior to expiration of the current notice period. We also would like to request that the City allow members of the SFFA to post the City's notice of the project in and near affected parks.

Please respond to these requests by close of business on May 25.

Thank you for your responsiveness in this matter.

Eric Miller

Miller-J-1

**From:** [Bill Wycko](#)  
**To:** [Jessica Range](#)  
**Subject:** Fw: Don't reduce or close  
**Date:** 10/04/2011 05:12 PM

---

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/04/2011 05:13 PM -----

**"Jennifer Miller"**  
**<millrjen@aol.com>** To: <bill.wycko@sfgov.org>  
cc  
10/04/2011 05:02 PM Subject: Don't reduce or close

01

I want to add my voice to the objection of closing all DPAs in Management Areas 1 and 2. If they, and those spaces like them, SF will become an even more difficult place to live in. The desirability of living in this city is closely tied to the ability to escape with my dog in not only 'non-urban' spaces but the variety of environments to do so. In my experience, those people that respect the non-dog people, environment, and picking up after their dogs are the vast majority. Like in any group, there are careless people (with kids, cars, bikes, etc) and education is an ongoing process!

Jennifer Miller  
San Francisco



Miller-N-1

**RECEIVED**

OCT 12 2011

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

Bill Wycko  
Environmental Review Officer  
Planning Dept  
1650 Mission St  
SF CA 94103

October 10, 2011

Dear Sir

In reference to the Natural Areas Program  
desire to limit or deny the presence of people  
with dogs, I am very concerned that any group  
would wish to deny another group's right to freedom  
of recreation. We have co-existed peacefully,  
viz., the dog owners, do not wish to deny the  
NAP their rights, and I sincerely hope that  
we can both peacefully continue to enjoy  
our rights as we have in the past.

We are a peaceful group. Many of us have  
gardens and respect all growing things (except some weeds)

Sincerely

Norma A Miller

NORMA A MILLER

246 Athens Street

San Francisco CA 94112

Miller-N-2



**Bill Wycko/CTYPLN/SFGOV**

06/04/2012 05:53 PM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: NAP Plan

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 06/04/2012 05:53 PM —



**Norma Miller**

**<normam20@men.com>**

06/02/2012 03:54 PM

To "bill.wycko@sfgov.org" <bill.wycko@sfgov.org>

cc Melinda McMurray <lindymcm@aol.com>

"selbygang@att.net" <selbygang@att.net>

Subject NAP Plan

01

In meetings with several individuals and one group of friends, I learned that none of them had heard of NAP's plans either by direct contact or by public means; i.e. Newspapers or television.

It seems too important and far-reaching a plan to be carried out without general public input. I hope we will be able to be well-informed before action is taken and irreversible harm is done to our environment,

Mills-1

**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 04:09 PM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: NAP EIR

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 04:10 PM -----

**Claire Mills**

&lt;clarable@yahoo.com&gt;

10/31/2011 03:37 PM

To bill.wycko@sfgov.org

cc Mark Farrell &lt;FarrellStaff@sfgov.org&gt;

Subject NAP EIR

Dear Mr. Wycko,

As an environmentalist with a degree in Environmental Studies, a member of the Sierra club and avid city parks against the SF Recreation and Parks Department's plans to destroy 18,000+ trees and reintroduce "native" and er their stead. This plan would limit the SF humans' and their pets' access to the parks we pay tax dollars to RECR

The SF Recreation and Parks Department should remove "Recreation" from it's title if this plan goes forward. If planted and their areas then closed off for recreation, it seems this would not be under the mission of a city recre but under a natural preservation zone. Such an area would not make sense to put in a densely populated city env

The EIR's arguments to remove off leash dog areas are not solid and ignore the actual usage of these areas by the EIR's analysis is incomplete and bases many arguments on "potential" negative impacts not on actuality. Who is sunshine and inclement weather 365 days a year? People with dogs are.

When I got my degree in Environmental Studies and Geography at San Francisco State in 1989, there were great Native Plant Society and their unbalanced views of nature in city areas. I remember a story among other well-ci group of fanatics which was that one member was disgusted with the British for bringing some non-native specie California and therefore snuck poison ivy into England for revenge. I am terrified that members of the Native Pl infiltrated the Rec and Parks Dept of our great city and have put forward such an incompatible plan with our Urb

With the health department's focus on obesity, how can a plan like this that limits access to recreation areas be ac acquire dogs to get them out into nature, get them exercising and get them socializing. It's scientific fact that dog blood pressure in people. Shouldn't we try to improve life where we live instead of reduce it's quality? The SPC off leash areas to keep aggression down in dogs. The dog community in San Francisco is well known and provid belonging and community to many neighborhoods. To repeat a statistic I'm sure you know, there are more dogs children. This reflects the importance of dogs in the lives of the city's inhabitants, voters, tax payers or however EIR's are to take into consideration the impact on the communities that surround the areas in question and this or I ask how can a dog chase a ball on a leash? I have suffered some immobility issues over the last year due to foc medical procedures. When I had my foot in a boot for 4 months and could barely walk a couple blocks on a goc areas I could drive to to let my dogs run free, I could not have managed. I could walk to pick up after them but t provide exercise was medically not recommended or possible. We must think of the handicapped. My experien heart to the needs of people with mobility issues with service dogs. Those dogs also need exercise.

If an alternative must be chosen, please support the Maintenance or Maximum Recreation Alternatives and pleas CITY parks, not Yosemite.

Mills-1

01  
(cont.)

For a final more globally based environmental question, how can a country that "scolds" Amazonians, Guatemala tearing down trees for subsistence needs like fuel and/or to grow food have the guts to rip down trees that keep c the word "native" which seems a very disputable word. I must contest this proposal.

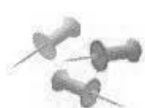
Thank you and I hope you truly consider the views of this city's most populous residents, the dog owners.

Claire Mills

2820 Greenwich Street #2

San Francisco, CA 94123

Milstein-1



**Bill Wycko/CTYPLN/SFGOV**

05/16/2012 12:30 PM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject: Fw: NAP

History:

➡ This message has been forwarded.

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 05/16/2012 12:30 PM —



**Prabha Milstein**

<p2mil@sbcglobal.net>

05/16/2012 10:35 AM

To: bill.wycko@sfgov.org

cc

Subject: NAP

Dear Mr. Wycko:

01

I live on Mt. Davidson in the city. I have been very upset with the constant reapplication of pesticides, as I walk my dogs there. I also am upset at all the trees that have been felled in the last two years. This is one of the very few places left in the city that is still a forest, a little refuge. My husband went out and talked to some of the folks from Parks and Rec while they were spraying pesticides, as well as cutting back thickets. They told him that the SF Forest Alliance was an extremist group. Perhaps it would be helpful if others knew just what the NAP's purpose was, as well as the fact that the city has a budget crisis and this is an enormous waste of taxpayer money. Thank you for your time.

Sincerely,  
Prabha Milstein, LMFT  
415.200.8093  
www.pmilsteintherapy.com  
p2mil@sbcglobal.net

Miner-1



**Bill Wycko/CTYPLN/SFGOV**  
10/31/2011 09:26 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV  
cc  
bcc  
Subject Fw: Writing in support of maintenance alternative

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:27 AM -----



**Laura Brunow Miner**  
<lbrunow@gmail.com>  
10/29/2011 02:22 PM

To bill.wycko@sfgov.org  
cc  
Subject Writing in support of maintenance alternative

01

Hi Bill! As a responsible dog owner in SF without a backyard, dog walkers and dog parks are a necessity in my life. Please consider the Maintenance Alternative to the City Parks Plan to maintain more space for our furry friends. Thanks!

LBM

Minsuk-1



**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 09:21 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: comments on NAP EIR

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:21 AM -----



**"Sue Minsuk"**

<sue.doggie.doright@gmail.com>

m>

To <bill.wycko@sfgov.org>

cc

10/30/2011 11:06 AM

Please respond to

<sue@doggie-do-right.com>

Subject comments on NAP EIR

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 and also a professional pet dog trainer. I have been walking and training dogs in the proposed restricted areas for over 15 years. 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

Minsuk-1

03  
(Cont.) [ restoration alternative or any other alternative that will take away recreational space in San Francisco city parks.

Sincerely,

Sue Minsuk  
Doggie Do Right Dog Training  
415-786-9157  
sue@doggie-do-right.com



Monagle-1



**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 09:21 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: GGNRA

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:22 AM -----



**Patricia Monagle**

**<mizmonagle@sbcglobal.net>**

10/30/2011 09:22 AM

To "Bill.wycko@sfgov.org" <Bill.wycko@sfgov.org>

cc

Subject GGNRA

01

It will bring such great sadness to so many people and families to have these areas closed off to people and their dogs. So much of the world has been walled off in my 70-year lifetime. We need to be able to walk, hike and take our dogs with us so we can still feel our relationship to the Earth. These are almost sacred places for us, and our lives will greatly impoverished without them.

Sent from my iPad

Moseley-1

October 10, 2011

RECEIVED  
OCT 17 2011  
CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
M.F.A.

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

RE: Support of DEIR for Significant Natural Resources Area Management Plan (SNRAMP)

Dear Mr. Wycko:

01

I am writing to give my support to the Draft EIR for the Natural Areas Program. I believe the findings are adequate, accurate and complete and should be accepted by the San Francisco Planning Department.

I have been a volunteer with SF Park and Recreation/Natural Areas Program since 2004. I am familiar with many of the City's Natural Areas such as Bayview Hill, Glen Canyon and Twin Peaks where I have participated in habitat restoration. I look forward to my volunteer days with the Natural Areas Program staff and other committed volunteers. It is time that this plan be adopted and implemented for the good of the whole city.

I think the report addresses impacts where possible as well as proposes practical mitigation measures. The plan lays out a reasonable path for natural resources management for The City and is consistent with other city departments, mandates and plans.

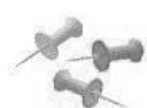
I appreciate having the opportunity to comment on this important issue. I hope it is passed favorably.

Regards,



Beth Moseley  
136 Guerrero #303  
San Francisco, CA 94103

Moyer-1

**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 04:17 PM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc:

bcc:

Subject: Fw: NAP EIR / No reduction of off-leash areas

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 04:17 PM —

**Leigh Moyer**  
<leighmo@sbcglobal.net>

10/31/2011 01:56 PM

Please respond to  
Leigh Moyer  
<leighmo@sbcglobal.net>

To: "bill.wycko@sfgov.org" &lt;bill.wycko@sfgov.org&gt;

cc: Leigh Moyer &lt;leighmo@sbcglobal.net&gt;

Subject: NAP EIR / No reduction of off-leash areas

Dear Mr. Wycko,

I am a SF resident, and I have two small dogs, which were both rescued from shelters. I walk daily with my two dogs on Bernal Hill, after I finish work. My dogs are well behaved, under voice command, and I pick up after my dogs. In addition to this being my main form of exercise, there is also a social aspect to walking on the hill, and I have made many wonderful friends and acquaintances by walking my dogs. I adamantly oppose any change in the off-leash area in this park for the following reasons:

1) 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.

2) 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).

3) 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.

4) 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.

5) I support the Maintenance Alternative, which EIR identifies as being environmentally superior alternatives.

Thank you for taking the above into consideration.

Sincerely,

Leigh Moyer

Mundy-1

October 4, 2011

Mr. Wycho,

01 [ I am in favor of expanding  
and opening new dog off leash play  
areas.

Thank you,  
Al Mundy  
406 Myra Way  
SF 94124

Muniz-1

**From:** [Bill Wycko](#)  
**To:** [Jessica Range](#)  
**Subject:** Fw: Don't close the Bernal Dog Park  
**Date:** 10/05/2011 09:06 AM

---

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/05/2011 09:07 AM -----

**Laurel Muniz**  
**<lmunizsf@gmail.com>**      To: bill.wycko@sfgov.org  
cc  
10/05/2011 06:34 AM      Subject: Don't close the Bernal Dog Park

Dear Mr. Wycko:

I am opposed to the closure of the DPA on Bernal Hill. I don't own a dog, but I love walking the hill and meeting friends and fellow Bernal residents that do have dogs. The Bernal DPA is a safe and beautiful place to bring dogs and it must be protected. Kids, dogs, residents-young and old, all mixing together. It's refreshing to see such activity in the middle of an urban area.

If the Bernal DPA is reduced in size as purposed, there will be no space for all of this activity. Dogs and their guardians will have no choice but to walk the concrete surfaces in our neighborhood and a years-long tradition of meeting on the hill will be gone.

The Bernal DPA is our URBAN PUBLIC SPACE! Please don't isolate members of our community by closing this area. Keep the Bernal DPA open and free for all to enjoy. Please do not reduce the size of this DPA. Our community needs every inch of this space.

Laurel Muniz  
Bernal Resident

Murphy-B-1

**Bob Murphy**  
325 - 14 TH AVENUE  
SANTA CRUZ, CA 95062

(831) 475-6037  
(831) 475-1942 FAX

October 13, 2011

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

**RECEIVED**  
OCT 14 2011  
CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
M E A

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:

The constant avalanche of so-called do-gooders who are trying to end the glorious life of the Sharp Park Golf Course is almost laughable. This majestic piece of gorgeous land has been wonderfully open and available for thousands of people, and many more animals for so many years.

All kinds of interesting animals and a wild variety of birds have had the run and flight of the place for a long, long, time. The fact that some of these players are retired old gentlemen chasing a dream or lovely ladies trying to dodge a little housework or some dirty dishes for an hour or two makes beautiful old Sharp Park even more a treasure than ever before.

Driven by political ideas or the foibles of misguided values, some folks in this day and age just like to take nice things away from people just to show how dedicated they are to their specific causes.

Sharp Park has been there for eighty years, much longer than most of the complainers, and it has produced wonderful fun and exercise for many thousands of people....and, provided marvelous open space for millions of birds (and a good number of "birdies", too), wonderful ambiance and nesting areas.

01

What better balance could there ever be between birds, animals and a few folks chasing their golf balls and staying well out of the way for all the wild life?

God Bless Sharp Park. It is a glorious combination for man, bird, and beast!!!

Sincerely,

  
Bob Murphy

Murphy-D-1

2945 Ulloa St.  
San Francisco, CA 94116  
October 31, 2011

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

RE: Significant Natural Resource Areas Management Plan Draft EIR

Dear Mr. Wycko:

- 01 { We support the draft EIR for the Significant Natrual Resource Areas Management Plan. It makes sense on a number of levels. The San Francisco elements need to be approved because they will guide the restoration of a very small part of our parklands and open spaces within the City.
- We agree that trees need to be removed in limited numbers. For example at Lake Merced restored areas need to be opened to light so native species can survive. In many cases those trees are eucalyptus which impact soil chemistry and block light from coastal scrub. In other cases the trees may be pines or cypress growing on slopes that are shading out native vegetation. Often these trees sprouted from seeds burried by Western Scrub Jays, so they are not part of a planned parkland. These trees also fall when they reach maturity and cause significant erosion. The plan for removal of selected trees is appropriate and necessary, not only at Lake Merced but in other natural areas.
- 02 { We encourage the removal of Sharps Park Golf Course from the plan. The golf course should be considered in much more detail. In fact, the failure to include the option to remove the entire golf course and restore it to nature should have been included, even if it were not the preferred alternative. The failure to do so suggests a failure in the CEQA process.

Thank you for your attention to this matter.

Very truly yours,

Dan and Joan Murphy

Nagle-1

**Mr. Taylor Gowan Nagle**  
**720 Junipero Serra Blvd**  
**San Francisco, CA 94127**  
**(415) 715-8816**

Mr. Bill Wycko  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103  
Email: bill.wycko@sfgov.org

October 31, 2011

REP: Comment to Draft EIR / Natural Areas Program

Dear Mr. Wycko,

I am writing today to comment on the Draft EIR. In particular my family opposes the Maximum Restoration Alternative and supports the Maintenance Alternative

I was born in San Francisco in 1968 and have lived here my whole life. My extended family resides here and I have recently had a child who I plan to raise on the west side of San Francisco. My son and I love the trees and forests of this area; we hike on Mount Davidson, walk in Stern Grove and enjoy the peaceful respite that the dense forests give from the hustle and bustle of the city. The trees and urban forests have shaped my existence during my life here, and I would hate to see them drastically change.

I became aware of the NAP program and their plans to restore native habitat only recently when I observed some cleared areas at Pine Lake in Stern Grove. The cleared and newly planted area was struggling and I wondered why this was done since the nearby forest was flourishing. This piqued my interest and since then I have researched the NAP program and reviewed the Draft EIR, so I feel I have a good understanding of what is at stake here.

While I understand NAP's rationale in restoring native habitat in general, I disagree with their aggressive plan to remove non-native trees and brush in the majority of open spaces in the city. I object to their practices, including the spraying of voluminous amounts of herbicides to prevent non-native plants from returning. The areas where they have done their restoration appear to be failing in many instances; to allow the restorations to proceed on a city-wide scale would be in effect rewarding failure.

There are budget concerns as well; can San Francisco truly afford to spend the money to clear and re-plant the amount of forested area envisioned by the NAP EIR? We should spend money on schools, homelessness and a plethora of other pressing matters before we pay to clear forested hillsides.

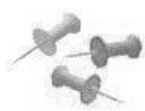
A compromise is in order; I think NAP should be allowed to do native restorations in un-forested areas where they have less clearing to do. Please leave the older trees and forested areas alone so that the next generation of San Francisco families can enjoy them as much as I have.

Sincerely,

Taylor Nagle



Naima-1

**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 04:12 PM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject: Fw: Comment on NAP EIR

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 04:12 PM —

**Reza Naima**

&lt;reza@reza.net&gt;

10/31/2011 03:22 PM

To: bill.wycko@sfgov.org

cc

Subject: Comment on NAP EIR

Bill,

Hi, I've been living in SF in the lower haight for 8 years now, and have recently opened a business downtown. My dog and I frequent duboce park, alamo square, crissy field, fort funston, and other offleash dog areas. The large presence of off-leash dog play areas was a very important factor in my decision to move to San Francisco.

I am writing in response to the solicitation for comments on the proposal to reduce the off-leash dog play areas. I am very opposed to the reduction of off-leash and would like you to consider the following:

- I feel that biggest negative factor affecting the parks is the maintenance staff of the parks, and the presence of dogs - especially at night - have made the parks a much safer environment by keeping drug dealers, and other unsavory individuals out of the parks (thanks to the responsible owners).
- Examples I've seen of the problems caused by maintenance staff at the parks:
  - No automated sprinkler system has been installed at duboce park and thus someone needs to turn the sprinklers on/off manually. I've found the park flooded many times by having the sprinklers not turned off
  - Drainage has been a huge problem at duboce park, and although the park service promised to do something about it years ago, no solution has been deployed. the park has recently been aerated, but this is a stop-gap solution and it should have happened years ago.
  - The excessive amount of rain from last year caused the ground to be soft (thanks to the lack of drainage). The maintenance staff would mow the lawn after heavy rains constantly, causing huge trenches to form in the grass from the wheels of the mower digging into the ground. My dog suffered a hip injury as he fell into one of these trenches while chasing after a ball.
  - Additionally, when the ground becomes damaged, and holes form which can be dangerous to individuals and dogs who can trip in them, they are not filled for weeks.

01

Naima-1

- 01 {  
(Cont.)
- A gardener sprayed pesticide/herbicide at a local park that a friend frequents and did not post any signage. The position got into my friend's dog's system and almost killed him.
  - There have been reports in the papers of unionized garden workers not planting plants and instead giving them out to friends while taking the day off
- 02 {
- If the fear is that dogs will damage plants, wouldn't adding fencing or other means of isolating dogs from vegetation be a more effective solution than to ban off-leash dogs?
  - The NAP EIR provided no evidence that dogs have an impact on plants and wildlife. Is this all from wild speculation or is there any proof that can substantiate such a dramatic change in the city policy.
- 03 {
- Quite the opposite, the NAP EIR does not take into account scientific studies that show off-leash dogs have little impact on plants and wildlife
  - the NAP EIR does not take into account the damage caused by people or children
- 04 {
- any reduction on the number of off-leash play areas will put more of a strain on the remaining areas. There are more dogs in SF than children (so I've been told) and dogs need places to play. People, like myself, move to SF because it provides an urban environment that is dog friendly. Taking these away (potentially up to 80% given the wording of the proposal) will cause a huge strain on the remaining 20%, making them into unsustainable mud pits.
- 05 {
- I'm also shocked that the NAP is planning on cutting down 18,000 healthy trees because they are not-native. Sounds very much like something that happened in Germany many years ago to non-native peoples. why? are you going to replace them with 18,000 native trees?

Thank you,  
Reza Naima  
229 Steiner St

Nelson-1

**From:** [Bill Wycko](#)  
**To:** [Jessica Rango](#)  
**Subject:** Fw: NAP EIR and off-leash dog areas  
**Date:** Monday, October 31, 2011 4:19:00 PM

---

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 04:20 PM -----

**Tiffany Nelson**                      Tobill.wycko@sfgov.org  
**<tcn5000@yahoo.com>**              cc  
 10/31/2011 04:17 PM              Subject: NAP EIR and off-leash dog areas

Dear Mr. Wycko,

- 01 { I am writing in regard to the NAP EIR and the potential impact on off-leash dog areas. I am a dog owner, live and vote in San Francisco, and enjoy the public parks with my dog, neighbors and friends.
- 02 { I am a member of SFDog. I fully support UC Professor Arthur Shapiro's analysis of the NAP EIR. In addition, the NAP EIR offers no concrete evidence that dogs negatively impact plants or wildlife. Use of the term "may" in the report reveals the weakness and inadequacy of the report.
- 03 { The NAP EIR's analysis of the impact on dog play areas is inadequate. The NAP EIR's definition of dogs as a "nuisance" discloses its bias against dogs and ignores the scientifically proven benefits that dogs bring to society and nature as an integral part of the environment. Dogs serve humans and nature in numerous, beneficial ways.
- 04 { The NAP EIR fails to recognize the further restrictions on public access to areas planted with "native" and endangered species of plants.
- 05 { Finally, the NAP EIR would have a negative impact on San Francisco's economy with the loss of jobs (e.g., professional dog walkers), more dogs being surrendered to the city shelter for lack of adequate venues for off-leash exercise, and loss of international status as a dog friendly tourist destination.
- 06 { I fully support the Maintenance or Maximum Recreational Alternative and urge you to do the same.

Thank you,

Tiffany Nelson  
 28th Ave and Clement St.  
 San Francisco

Norton-1

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

**RECEIVED**

NOV 01 2011

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

Donald Norton / Nancy Sack  
4750 25<sup>th</sup> St  
San Francisco, CA 94114  
415.309.9502

October 27, 2011

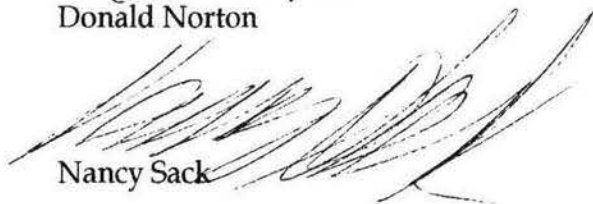
Dear Mr. Wycko,

- 01 [ As a concerned citizen and owner of a well-trained dog (puppy 1&2, SFSPCA animal assisted therapy , SFSPCA agility 1&2) it is of vital importance that we maintain the status quo of current off-leash dog areas in San Francisco. By reducing the current size and/or number of off-leash dog play areas, 1) the potential to introduce crowding (an environment where dogs can often get aggressive) and/or 2) Force owners to utilize marginal areas which could end up causing more degradation of NAP areas; grows.
- 02 [ As such, I support the "Maintenance Alternative" which Parks & Recreation has designated the environmentally superior option.

Best Regards,

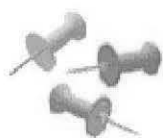


Donald Norton



Nancy Sack

Oliva-1



**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 09:10 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: Significant Natural Resource Areas Management Plan  
separate out from Sharp Park

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:10 AM -----



**Veronica Oliva**

**<veronicaoliva@sbcglobal.net>**

>

10/31/2011 08:24 AM

To bill.wycko@sfgov.org

cc

Subject Fwd: Significant Natural Resource Areas Management Plan  
separate out from Sharp Park

Begin forwarded message:

**From:** Veronica Oliva <[VERONICAOLIVA@SBCGLOBAL.NET](mailto:VERONICAOLIVA@SBCGLOBAL.NET)>

**Date:** October 31, 2011 8:23:45 AM PDT

**To:** [john.rahaim@sfgov.org](mailto:john.rahaim@sfgov.org)

**Cc:** [Linda.Avery@sfgov.org](mailto:Linda.Avery@sfgov.org)

**Subject: Significant Natural Resource Areas Management Plan separate out from  
Sharp Park**

RE draft EIR for Significant Natural Resource Areas Management Plan

Dear Mr. Rahaim,

I'm writing to recommend that the Sharp Park and golf course be separated out from the Natural Areas plan.

I recommend this so that San Francisco's natural areas can get the stewardship they need without the potentially significant delay the Sharp Park golf course issue could bring.

Thank you for your attention.

Best regards,

Veronica Oliva  
33 Seward Street  
San Francisco CA 94114  
tel 415.337.7707  
[veronicaoliva@sbcglobal.net](mailto:veronicaoliva@sbcglobal.net)

01

Olliphant-1

**From:** [Bill Wycko](#)  
**To:** [Jessica Range](#)  
**Subject:** Fw: Please don't restrict off leash access for dogs  
**Date:** 10/05/2011 10:43 AM

---

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/05/2011 10:43 AM -----

**"Hugh Olliphant"**  
**<hugh@wednesdays.com>**

To <bill.wycko@sfgov.org>  
cc

10/05/2011 10:12 AM

Subject Please don't restrict off leash access for dogs

Bill,

01

I needn't tell you about the positive impacts dogs have on our community. Dog owners make our city's parks safer (e.g. look at the history of Dolores Park). I'm writing to encourage you to think through alternatives to closing off leash dog runs, particularly given that the draft environmental-impact statement by the Golden Gate National Recreation Area has already shown no direct link between dog walking and any environmental damage in GGNRA lands.

Thanks,  
-H

Hugh Olliphant  
225 Murray St, SF, CA 94112  
650 814 7476

O'Neill-1

Date: October 21, 2011

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

**RECEIVED**  
OCT 25 2011  
CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
S F A

Dear Mr. Wycko -

I understand there is currently under review a proposal by the Natural Areas Program of the Recreations and Parks Department to expand the areas impacted by "Natural Areas Habitat Restoration."

I strongly object to this on several fronts.

01

First, as always, this plan would seriously restrict off-leash dog-walking areas available. I am a 64-year old woman who walks daily in McLaren Park with my two dogs. It is a matter of health and well being for us all that we can walk up and down hill for considerable distances. My doctor is always pleased to hear that I am getting this regular exercise - my dogs are inspiration, companion and, should it be necessary, protector. To deny them access to the wonderful open space we now enjoy in McLaren Park would be to deny me an important avenue for maintaining my health. I am sure this is true for many people throughout San Francisco.

Also the fact that there are an estimated 110,000 dogs in San Francisco means there is an ongoing and significant need for off-leash areas and a considerable constituency in support of them. Surely, it is obvious it is far better for dogs, people and our city streets that there are off-leash areas for them to get their exercise. To paraphrase Cesar Milan, "A tired dog is a happy and obedient dog." Nothing allows them to expend their energy in such a happy, healthy way as a good off-leash romp.

02

Finally, putting aside the important considerations regarding why off-leash areas, which this plan would restrict, are so important to dogs and their owners, I question the validity of expansion of the Natural Areas Program on it's face. It seems to me that the Natural Areas Program has as its ultimate goal a restoration of San Francisco to its "natural" state, which they define as limited to flora and fauna dating from a time before major settlement. In order to recapture this environment, they propose:

1. Restricting use of our parks to large segments of San Francisco's population,
2. Destroying healthy living trees and plants because they came into the environment after the time the Natural Areas Program has deemed 'natural' and therefore permissible\*, and
3. Introducing toxins into the environment in order to destroy plants and trees not meeting their criteria.

It seems to me they want to turn the City's parks into museums to a time past, rather than living, evolving environments for this City's citizens to enjoy. Let's face it, our lovely Golden Gate Park exists largely outside of the parameters of the "Natural Areas."

It is my understanding they currently are involved in many open areas of San Francisco. While I do not wish to expel them from those areas, I strongly object to their goals being the controlling vision for San Francisco's parks.

Thank you,



Elizabeth O'Neill  
312 Athens Street  
San Francisco, CA 94112

(\* Note: I know there are proponents of "Natural Areas" who would destroy every Eucalyptus tree in San Francisco. One of their claims is that Eucalyptus trees prevent anything else from growing. Well, I walk every day through a Redwood grove in McLaren Park and not much else grows there either. However, it is a lovely place to be. And, I assume given their age, the Redwoods would escape the Natural Areas ax.)

Otto-1

863 Elizabeth Street  
San Francisco, CA 94114  
October 17, 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

Re: Draft EIR, Natural Areas Program

Dear Mr. Wycko:

I have lived in San Francisco since 1988 and bought my first home in Glen Park in 1992. Since then I have been a devoted Glen Canyon Park visitor. In fact, I walk in Glen Park almost every morning.

I have never given public comment before about anything in San Francisco. I am a consultant and extremely busy. However, I am so bothered by the use of pesticides by the Natural Areas Program of Park and Recreation that I had to get involved. I have been actively trying for the past year to stop the Natural Areas Program from using Tier 1 and Tier 2 pesticides to "kill" non-native plants.

01

In San Francisco, the Board of Supervisors legislated that all San Francisco officers, boards, commissions, and departments of the City and County implement the Precautionary Principle in conducting the City and County's affairs. The Precautionary Principle states, "where threats of serious or irreversible damage to people or nature exist, lack of full scientific certainty about cause and effect shall not be viewed as sufficient reason for the City to postpone cost effective measures to prevent the degradation of the environment or protect the health of its citizens."

And yet, the Department of the Environment and the Natural Areas Program justify using Tier 1 and Tier 2 pesticides even though they lack full scientific certainty about how safe they are to use. For Garlon 4 Ultra, a Tier 1 pesticide, the Department of the Environment has told me directly that while there is a study that has been conducted that raises serious concern, the methods of the study are not strong enough to justify outright banning of Garlon 4 Ultra.

I know of so many people, very close friends, who have been diagnosed with cancer in San Francisco. We are all too familiar with corporate claims that there is not strong enough proof that the products they make can be directly linked to cancer. That was the similar case with tobacco. How many people had to get sick and die before the government put restrictions on the sale of tobacco because there wasn't enough proof? There simply is not enough money to test every pesticide thoroughly, and every new variation of a pesticide, to stay ahead of the harm that might be caused.



Otto-1

02

As citizens, all we can rely on is the information that the San Francisco Department of the Environment and the manufacturer of the pesticides tell us. For Garlon 4 Ultra, the Department of the Environment limits its 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 injection are not feasible and only with use of a respirator."

The Natural Areas Program sprays the whole hillside of Glen Park Canyon with Garlon 4 Ultra to get rid of oxalis, commonly known as clover.

The manufacturer of Garlon 4 Ultra publishes in their Material Safety Data Sheet that it degrades slowly in the environment, fails tests for ready biodegradability, is "highly toxic" to aquatic life and "slightly toxic" to birds.

In Glen Park Canyon, along the stream, there are signs heralding this riparian community and how it serves as a resting spot for migratory birds. How ironic that the Natural Areas Program then uses pesticides that are "highly toxic" to aquatic life and "slightly toxic" to birds.

The Precautionary Principle is supposed to be there to protect all of us. I worry about the wildlife that live in Glen Canyon Park and rely on the vegetation to survive. I worry about the pre-school children who come and play in the park everyday. I worry about all the dogs who run on the trails and eat the grasses. And I worry about my city that I love so much ignoring the repeated concerns of its citizens and refusing to alter course.

This doesn't feel like a truly democratic process to me.

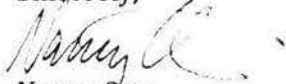
03

I am vehemently opposed to the recommendations of the draft Environmental Impact Report for the Natural Areas Program. The Natural Areas Program has not effectively demonstrated its ability to:

1. kill the non-native invasive species it poisons each year – it grows back each spring
2. comply with regulations on how to administer the poisons – they are frequently caught applying the poisons without adequate notice or using appropriate respirators
3. create a sustainable native plant garden without relying on toxic pesticides.

I cannot understand how we would then turn around and give the Natural Areas Program more authority over more land to continue with these same practices.

Sincerely,



Nancy Otto

Pattillo-1



October 27, 2011

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

RE: Sharp Park Golf Course – Historic Resource Evaluation

Dear Mr. Wycko,

I have reviewed Appendix C of the DEIR for the *Significant Natural Resource Areas Management Plan: Sharp Park Golf Course* and question the determination of eligibility for listing on the National Register of Historic Properties (NRHP). On page 5-4 the author suggests that Sharp Park Golf Course has historic significance under Criterion A and C under the NRHP and Criterion 1 and 3 for the California Register of Historic Resources (CRHR). Criterion C/3 requires that "a property embody the distinctive characteristics of a type, period, or method of construction that represents the work of a master, or that possesses high artistic values". Based on the number and extent of alternations that have taken place since the period of significance (1929 – 1932) I question the validity of finding Sharp Park eligible as a historic resource.

*Bulletin 18 "How to Evaluate and Nominate Designed Historic Landscapes,"*<sup>1</sup> states "As defined by the National Historic Preservation Act of 1966 and the National Register criteria, to be eligible for the National Register a designed historic landscape must possess significance ..... and integrity of location, design, setting, materials, workmanship feeling and association." Sharp Park Golf Course lacks integrity.

01

The *Historical Resources Evaluation Report* (HRER) prepared by Tetra Tech, Inc. describes many alterations made to the course since 1932. Comparing the course layouts depicted in the two exhibits included in the Evaluation Report<sup>2</sup> one finds very few similarities between how the course was designed and how it exists today.

<sup>1</sup> National Park Service, "How to Evaluate and Nominate Designed Historic Landscapes," *National Register Bulletin No. 18*, p. 6.

<sup>2</sup> The original Sharp Park Golf Links plan prepared by Mackenzie, Hunter & Egen (Figure 3) and the aerial of the Existing Golf Course (Figure 2).

Chris    Cathy    Christopher  
Pattillo   Garrett   Kent

444 - 17<sup>th</sup> Street Oakland CA 94612  
Tel 510.465.1284 Fax 510.465.1256

Pattillo-1

01  
(Cont.)

1. The original hole 1 (now hole 11) was a long, straight shot. The reconfigured hole doglegs to the right.
2. The original hole 2 (now hole 12) was a dogleg that wrapped around the south end of the course. Hole 12 is now a lot shorter with no dogleg.
3. The original holes 3, 4, and 8 were destroyed in a big storm and not replaced.
4. The original hole 5 offered multiple fairway options – a unique design feature of Mackenzie. Hole 17 which replaced 5 is a single straight shot.
5. The original hole 6 that ran east-west at the north boundary no longer exists.
6. The original hole 7 appears to be similar to current hole 16 identified on Figure 2 as having been built after 1941, after the period of significance.
7. The original holes 9 and 10 each offered double fairways. The replacement holes 13 and 14 eliminated these special features.
8. The original hole 11 – a short run - appears to be similar to current hole 15.
9. The original hole 12 was a long straight shot. It has been replaced by hole 18 that is longer with a dogleg.
10. The original holes 13, 14 and 15 were on the east side of the county road and generally paralleled the road running north-south. Today this area has four holes that all run east-west.
11. The original hole 16 was a dogleg left replaced by hole 3 a straight shot.
12. The original hole 17 ran east-west and was a long shot with a dogleg. Hole 8, a short, straight fairway replaced it.
13. The original hole 18 was a dogleg. This hole has been replaced by hole 2, a straight shot.

In summary only hole 11 (now hole 15) is similar to the original design. The layout of the remainder of the course has been substantially altered. The change to the order of how the holes are played is significant as it materially alters the sequence and nature of views the player experiences making it unlike what was intended by the designer. Other major changes implemented since the period of significance include:

01  
(Cont.)

- A. Elimination or reconfiguration of several sand traps.
- B. Construction of a seawall in 1941 to prevent flooding of the golf course. This eliminated views to the beach and Pacific Ocean and the essence of the links design concept.
- C. Filling a portion of the lagoon as part of the reconfiguration of hole 10.
- D. Installation of concrete golf cart paths along the back nine holes in 1996 where none existed previously.
- E. Culverting of water features on five holes and the elimination of water hazards – an important component of the original design.
- F. Installation of a 4000-gallon pump to help with annual flooding of Laguna Salada.
- G. Alterations made between 1985 and 1994 to accommodate female players such as shortening of the fairways.

Pattillo-1

Adding together all of these alterations it is apparent that Sharp Park Golf Course lacks sufficient integrity to qualify as a historic resource under criterion C/3. The course no longer reflects the work of Alister Mackenzie. The land use remains a golf course but otherwise there are few similarities between the course that existed during the period of significance and what remains today.

The Evaluation Report notes that Alister Mackenzie attained status as a master golf course architect. Appendix C on page 4-7 notes, "George Shackelford, in his book *Grounds for Golf*, describes Mackenzie as a master designer and offers that Mackenzie's secret to creating unique courses was his talent for routing." Regrettably, today nothing remains of Mackenzie's unique routing. He continues to explain that his work "was known for its original and distinctive bunkers, with irregular shapes and each with its own design." And "Distinctive bunkering, the use of small hillocks around greens, and exciting hole locations were Mackenzie's trademark".

Another of Mackenzie's trademarks was his talent for working with natural landform and subtly integrating his courses with a site's topography to take full advantage of the unique qualities of each site. Quoting from the HRER, "Mackenzie felt that the success of golf course construction depended entirely on making the best use of natural features and devising artificial ones indistinguishable from nature." The HRER continues with, "..... while many architects try to create a special course, Mackenzie could figure out how best to fit holes into a property and situate a golf course to evoke a comfortable, settled, connection to the ground. His course routings are always functional and original but rarely do they fight the contours of the property."

In summary, defining characteristics of Mackenzie's design style included unique course routing, a talent for adapting a course to fit the land, an ability to offer challenge to players of varying skill levels, distinctively designed bunkers, and inclusion of multiple fairway options – offering advantage to those to took greater risks in their play. The vast majority of these features have been eliminated from the course. According to Wexler, in a recently published article "no appreciable trace of his strategy remains in play."<sup>3</sup>

Unfortunately, Sharp Park Golf Course began to fail even before the course opened in 1932 because Mackenzie failed to fully understand the forces of nature at this site. Page 4-3 of the Evaluation Report notes that the opening was delayed twice due to "drainage problems on the course due to winter rains." Shortly after the course opened a major storm washed out a large portion of the course and necessitated construction of the seawall in 1938 intended to prevent similar damage in the future. This type of damage has continued – as recently as 1982 a major storm wiped out several holes. In 1990 another breach killed many of the cypress trees on the course. Few of the golf courses designed by Alister Mackenzie remain intact today. It would be ironic and misplaced if this course – one that represents a failure in design – became a lasting representative of his life's work by being officially designated as a historic property.

<sup>3</sup> Dr. Alister Mackenzie, "Sharp Park Golf Course", Pacifica, CA page 113

01  
(Cont.)

Pattillo-1

01  
(Cont.)

The determination of historic significance is tied to a site's level of integrity. According to *A Guide to Cultural Landscape Reports: Contents, Process, and Techniques*<sup>4</sup> "The historic integrity of a cultural landscape relates to the ability of the landscape to convey its significance." And "Historic integrity is assessed to determine if the landscape characteristics and associated features, and the spatial qualities that shaped the landscape during the historic period of significance, are present in much the same way as they were historically." Emphasis added.

The guide continues, "Historic integrity is determined by the extent to which the general character of the historic period is evident, and the degree to which incompatible elements obscuring the character can be reversed". In the case of Sharp Park Golf Course the changes to the course were not the result of the normal evolution of a living landscape – maturing trees and other plantings, but rather major changes that were forced to solve functional problems that resulted from flaws in the original design – a failure to fully understand the power of nature and its ability to wreak havoc. The changes made to Sharp Park Golf Course cannot be reversed because doing so would recreate the conditions that necessitated that the alterations be made in the first place.

Page 5-2 of the HRER notes, "Because landscape features change over time, a landscape need not retain all of the original features it had during its period of significance, but it must retain the essential features and characteristics that make its historic character clearly recognizable."

In essence for a site to meet the criteria of historic significance most of the designed features must look as they did during the period of significance. This may be true for the Clubhouse and maintenance building which are not addressed here, but it is not the case at Sharp Park Golf Course and no doubt explains why "None of the state or national registers identified Sharp Park Golf Course as a historical resource" as noted on page 4-1 of the HRER.

By making the finding that the existing golf course represents a historic resource under criterion C/3 it seems that Tetra Tech failed to appreciate not only the subtleties of golf course architecture but its essential features. Just because there was a golf course present in 1932 the fact that there is still a golf course present today, does not qualify the current course as a historic resource.

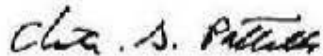
<sup>4</sup> A Guide To Cultural Landscape Reports: Contents, Process and Techniques by Robert R. Page, Cathy A. Gilbert, and Susan A. Dolan, US Department of the Interior, National Park Service, Cultural Resource Stewardship and Partnerships, 1998.

Pattillo-1

01  
(Cont.)

Sharp Park Golf Course lacks integrity. While a golf course at this site is consistent with the historic land use, that fact is insufficient evidence for a finding of historic significance. Failure to demonstrate significance voids eligibility for historic resource status. I urge you to consider this as you plan for the future use of Sharp Park.

Sincerely,



Chris Pattillo, ASLA  
Historic Landscape Architect  
President, PGAdesign<sup>inc</sup>

Perrins-1



**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 09:21 AM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject: Fw: My comment on the Natural Areas Program  
Environmental Impact Review

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:21 AM -----



**Georgie Perrins**

**<georgie@puppethorse.com>**

10/30/2011 10:19 AM

To: bill.wycko@sfgov.org

cc

Subject: My comment on the Natural Areas Program Environmental  
Impact Review

Bill Wycko, Environmental Review Officer

SF Planning Department

1650 Mission Street, Suite 400

San Francisco, CA 94103

[bill.wycko@sfgov.org](mailto:bill.wycko@sfgov.org)

Dear 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 and resident of San Francisco for the past 11 years. I appreciate the recreational space we have in the city to exercise my dog and to feel these health benefits myself, especially at Bernal Hill. We adopted our dog from the San Francisco SPCA and by nature of her herding breed she is a high energy dog that requires considerable running daily. We see this exercise as maintaining her good health and is the secret to her behavioral well-being. Like most residents in this city we do not have our own garden and completely rely on the recreational space of parks for exercise for canine companion. If the dog play areas described in the The Natural Areas Program are to be eliminated in San Francisco city parks, where will we go with our dogs? And will this be a continuing trend where we will loose more areas in the future? The reality is that San Francisco is a city of dogs, and dog lovers who are largely responsible contributing citizens. Please consider alternative areas to our recreational space to grow more native plants. Together we can support both efforts.

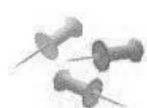
I appreciate your time and consideration.

Sincerely,

Georgina Perrins



Perry-A-1



**Bill Wycko/CTYPLN/SFGOV**

05/31/2012 02:55 PM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc:

bcc:

Subject: Fw: Don't cut trees on Mt. Davidson

— Forwarded by: Bill Wycko/CTYPLN/SFGOV on 05/31/2012 02:55 PM —



**Andrea Perry**

**<andrea.marie3@comcast.net>**

>

05/31/2012 01:17 PM

To: bill wycko <bill.wycko@sfgov.org>

cc: sfforestnews@gmail.com

Subject: Don't cut trees on Mt. Davidson

Dear Mr. Wycko:

01

I became aware of the NAP's intention to cut down many of the healthy and beautiful trees on Mt. Davidson from the local paper, and some fliers. My husband and I are both completely against it, and are disgusted by this plan. First, as residents of Westwood Highlands, located on the south side of Mt. Davidson, we can't even understand how this idea could have ever been considered a good one. The beautiful trees, and the smell of Eucalyptus are wonderful and add to the beauty of this mountain and the park.

With all the government "wasteful" spending going on not only in the federal, but state government as well, I would think that there are better ways to spend local taxpayers money.

Don't do it.

Feel free to call us if you want more information regarding our thoughts on this particular matter.

Andrea & Arie Perry  
118 Cresta Vista Dr.  
San Francisco, CA 94127  
415.494.5552



Perry-J-1

**From:** [Bill Wycko](#)  
**To:** [Jessica Range](#)  
**Subject:** Fw: Don't close the Bernal & other Dog Parks  
**Date:** 10/11/2011 05:06 PM

---

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/11/2011 05:06 PM -----

**John Perry**  
<[bensdad415@yahoo.com](mailto:bensdad415@yahoo.com)>

To: "bill.wycko@sfgov.org" <[bill.wycko@sfgov.org](mailto:bill.wycko@sfgov.org)>  
cc

10/09/2011 07:28 AM

Subject: Don't close the Bernal & other Dog Parks

Please respond to  
John Perry <[bensdad415@yahoo.com](mailto:bensdad415@yahoo.com)>

Dear Mr. Wycko:

I am opposed to the closure of the DPA on Bernal Hill, McLaren, and Lake Merced.

We have lived in Bernal Heights for 13 years, just a block from the Hill down Wool Street. We have three dogs and two kids, and our entire family relies on access to this incomparable recreation space. It is integral to our urban quality of life.

With more dogs than children currently living in San Francisco, we need to find ways to encourage healthy, sustainable use of our open spaces, not restrict dogs to more confined sites. A whole host of problems will come of that kind of crowding.

Please keep Bernal, McLaren, and Lake Merced open to dogs and people.

John Perry  
Bernal Resident

01

Pfister-1



**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 11:50 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: Significant Natural Resource Areas Management Plan  
DEIR - Comments

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 11:50 AM -----



**pri <nopuedo@earthlink.net>**

10/31/2011 10:00 AM

Please respond to  
pri <nopuedo@earthlink.net>

To bill.wycko@sfgov.org

cc

Subject Significant Natural Resource Areas Management Plan DEIR -  
Comments

Page 141

Pine Lake Park

01

PL-7c & PL-7b are inadequate measures to protect the lake from dogs. Dogs do not read signs and cannot be made aware of a prohibition of entering the lake. The leash law must be enforced in this area of the park. Many park visitors with dogs have a tradition of ignoring the leash law and this can only be changed through enforcement.

I would also like to see measures enacted to reduce run off into the lake, including from dog feces through enforcement of the statute requiring picking up after dogs.

Pages 143 ff

III.I.23 Sharp Park (SP)

02

The Recommended Management Actions that do not involve extensive ecological restoration seem half-baked and unlikely to be successful. Is there any scientific basis for believing that these specific actions will protect endangered species? Pumping, building mounds, educating golf course staff, and monitoring water levels and species do not seem to be actions for which implementation is realistic. These types of actions seem to me apologies and cover frequently found in EIS plans for not really addressing the problem of endangered species.

My suspicion seems to be supported by the opinions of specialists who submitted declarations as part of a lawsuit:

<http://wildequity.org/entries/3177>

The analysis of Sharpe Park done by Wild Equity ([www.wildequity.org](http://www.wildequity.org)) seems to be thorough and science based. Although I can understand that some golfers have an affinity for the golf course, it seems that a cost benefit analysis does not support maintaining the golf course for such a specialized use, especially given many other golfing alternatives in the area.

Pfister-1

- 02 (cont). { It appears that any alternative that does not involve extensive ecological restoration is not science based. The Plan should acknowledge that support for other alternatives is political in nature.
- 03 { Nature in the City ([www.natureinthecity.org](http://www.natureinthecity.org)) advocates separating Sharp Park from the Natural Areas Plan to avoid tying up the Plan in litigation. If this is necessary to avoid tying up the Plan, then I support this Action because I believe that those making legal challenges to the current recommended Actions in Sharp Park based on endangered species statutes will succeed.

I also support Nature in the City in the following:

- 04 { - For the purposes of the SNRAMP DEIR, recreation should include community stewardship. This would change the balance of purported recreational impacts.
- 05 { - That the recreation and maintenance alternatives are the "environmentally superior alternatives" and neither the restoration nor the proposed project are, is, apparently, an unfortunate paradox of CEQA, where biodiversity is considered no more important than aesthetics or recreation within the human environment.
- 06 { - The true impacts (and benefits!) of the maximum restoration alternative cannot be properly evaluated against the proposed project, since the description is only two pages long. Thus, no such definitive conclusions about recreation impacts or biological benefits can be made because there is no substance to the alternative. It is totally general.

Page 155

#### IV.A.5 San Francisco Dog Policy

- 07 { "The SFRPD welcomes dogs on leashes in most of its parks; dogs are allowed off-leash in 19 designated areas."
- Off-leash dogs are an important threat to biological diversity in the parks. There needs to be more enforcement of the leash law to limit off-leash activity to the designated areas.

Charles Pfister  
San Francisco, CA

Pittin-1

**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 04:37 PM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: Comments - NAP EIR

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 04:37 PM —

**Rense Pittin**

&lt;rpittin@gmail.com&gt;

10/31/2011 04:32 PM

To bill.wycko@sfgov.org

cc

Subject Comments - NAP EIR

Dear Mr. Wycko,

Thank you for the opportunity to comment on the Natural Areas Program EIR.

Errors and assumptions in the EIR demonstrate that there is a basic lack of research underlying this EIR, and this is not a basis for going forward with the plan.

For example, assumptions are made regarding the impact of dogs, whereby it is stated that "Dogs may be impacting plants or wildlife", while there is no evidence given or reference made to any studies which state that such impacts \*are\* being made or felt. These hypotheticals are then used as fact, and the EIR then seeks to remove dogs' \*continuing\* impact, while the initial impact has never been demonstrated or justified by statistical, scientific, or other reasonable basis. The City cannot truncate a primary form of recreation, walking in our local parks and open spaces with our off-leash dogs, on the basis of hypotheticals and unproven assumptions.

Dogs are generally regarded as nuisances in this EIR, and I find this position to be a very big problem indeed. The parks and the Dog Play Areas already created were established based on proven need. Indeed, there were to be more DPAs created after Rec and Park studied the issue, following the sunseting of the Dog Advisory Committee (DAC). Rec and Park has never made this study, and has never come out with a plan for more off-leash areas. The NAP EIR seems to have been written in a vacuum, without consideration of the recreational requirements being met by already established DPAs, or the need for more space for off-leash and other forms of recreation. San Franciscans need more space for recreation, not less.

I have another very great concern with the NAP, which is its use of pesticides and herbicides. As a resident of Upper Noe Valley, I often walk in Glen Canyon. So do thousands of others, day after day. And yet, Glen Canyon is one of the areas where the NAP uses herbicides and pesticides, again and again. Rec and Park itself recognizes that "visitors, kids and dogs might come in direct contact with the weed [killer]", but their only solutions are to "limit the areas" where they spray and to seek other solutions, which they state they have not found. (SF Recreation & Parks Department, "Significant Natural Resource Areas Management Plan

Pittin-1

- 02 (Cont.) { Overview", n.d., p. 4).
- The NAP applied Garlon, a Tier I (most hazardous!) pesticide, in its "Natural Areas" 36 times in 2010 (up from 16 times in 2009). It used Roundup or Aquamaster, Tier II (hazardous) pesticides, 42 times in 2010, up from 7 times in 2009. Not only are we - adults, seniors, kids and dogs - affected by these chemicals, so are all the critters living in the NAP open spaces. In Glen Canyon, the coyotes, racoons, skunks and other wildlife have no place to go and no place to hide when these poisons are laid down, which then become part of the environment.
- While such applications are legal, they are neither safe nor right. The NAP should be reduced in scope, so that manual methods of weeding and maintenance can be used, not toxic chemicals. The native plants in Suto Forest are not doused with chemicals; this is the direction that the NAP should go. With a smaller area, the NAP could use environmentally appropriate methods, not spraying and daubing with herbicides and pesticides.
- 03 { The NAP EIR does not recognize the other needs and uses for San Francisco open space, and does not reflect the pressures which are created also by possible changes in the GGNRA, our other recreational space. We cannot dedicate our recreational and open spaces primarily to creating a plant museum from an arbitrary "pre-European" era when all was "natural" and "native". The EIR, in its focus on expansion, also does not reflect the possibility of reducing the NAP program so that the San Franciscan population - people and wildlife - are no longer subject to the effects of NAP chemical warfare.
- 04 { I ask that the EIR be redone to reflect the realities of recreation and alternative uses of our shared open spaces, and to reduce the toxicity of our already all-too-polluted urban environment. A new, science-based EIR should be prepared for consideration.

Sincerely,

Dr. Renee Pittin  
671 28th Street  
San Francisco, CA 94131

Popoff-1

**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 04:10 PM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: NAP EIR Comment

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 04:11 PM -----

**Georgette Petropoulos**

&lt;georgettekp@sbcglobal.net&gt;

To "bill.wycko@sfgov.org" &lt;bill.wycko@sfgov.org&gt;

cc

10/31/2011 03:29 PM

Subject NAP EIR Comment

Please respond to  
Georgette Petropoulos  
<georgettekp@sbcglobal.net>

October 31, 2011

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

Dear Mr. Wycko,

We are life-long San Francisco residents and have owned dogs as since the 1960s. During those many years we have enjoyed walking with our dogs in many of the varied locations this city has to offer: Golden Gate Park, Pine Lake Park, Mt. Lake Park, Ft. Funston, the Presidio, Lake Merced, Sutro Park, Lands End, Buena Vista Park to name a few.

01

One of the joys of living in San Francisco is the availability of so many dog-friendly areas, both on and off leash. Since we live in the western part of the city, most of our walks take place there. It's a huge concern to me that so many dog play areas are being threatened by the Rec and Park Department's proposed Natural Areas Program. I have been a member of the years of both the Sierra Club and the League of Conservation voters, so I am very aware of the impact on the environment of various activities. However, I don't believe that restricting off-leash recreation in this urban setting and replacing it with "natural" flora is the best decision

02

The NAP EIR does not show evidence proving that dogs have an adverse impact on wildlife in natural areas, nor does it take into account studies that show dogs have little or no impact on plants and wildlife.

03

One thing that seems to be missing from many decisions being made regarding dogs and recreation in and around this city is that San Francisco is an URBAN area, not a wilderness area. We also have more households with dogs than children. It's not just about the dogs, it's also about the people who own the dogs and walk their dogs for exercise and recreation. My observation has been that

Popoff-1

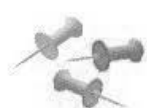
03  
(Cont.)

the majority of dog owners are very conscientious and work together to keep areas clean and safe. Restricting the currently available areas will adversely impact the remaining Dog Play Areas. The dogs are not going away.

We do not believe it is in the best interest of the residents of San Francisco to implement this restrictive plan.

Sincerely,  
Michael Popoff  
Georgette Petropoulos  
656-39th Ave.  
San Francisco, CA 94121

Potts-1

**Bill Wycko/CTYPLN/SFGOV**

05/16/2012 09:39 AM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc:

bcc:

Subject: Fw: city parks

History:

This message has been forwarded.

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 05/16/2012 09:39 AM —

**Jason Potts**

&lt;wheelspin68@yahoo.com&gt;

05/16/2012 07:53 AM

Please respond to

Jason Potts

&lt;wheelspin68@yahoo.com&gt;

To: "bill.wycko@sfgov.org" &lt;bill.wycko@sfgov.org&gt;

cc:

Subject: city parks

01

I have lived in San Francisco for almost 30 years. Years ago I lived at the base of Mt. San Bruno and used to go for daily hikes after work until one fine afternoon I came around the corner to find the entire mountain had been clear cut. I have only been back one time since. In my humble opinion the park and the beautiful trails that once threaded along under the eucalyptus grove was completely ruined do to that plan to restore the mountain to it's original habitat.

Now all these years later I live in Glen Park just one block away from the canyon, where my two daughters go to Glenridge co-op nursery school, needless to say after 10 years of living here i have come to find out that the city plans to cut down the eucalyptus there now and start the application of pesticides to prevent unwanted growth in the canyon. I can't begin to tell you how upset this has made me.

What is next? Golden Gate Park started as sand dunes, will it be returned to it's original state too?

Please do not let this happen!

Thanks for your time and consideration,  
Jason Potts

Jason Potts  
Photography  
P.415 595-7397  
F.415 334-2851  
wheelspin68@yahoo.com



Pruitt-1

**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 04:08 PM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject: Fw: NAP EIR Comments

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 04:09 PM -----

**Beth Pruitt**

&lt;prooproo@yahoo.com&gt;

10/31/2011 04:00 PM

Please respond to

Beth Pruitt

&lt;prooproo@yahoo.com&gt;

To: "bill.wycko@sfgov.org" &lt;bill.wycko@sfgov.org&gt;

cc: "Eric.L.Mar@sfgov.org" &lt;Eric.L.Mar@sfgov.org&gt;

Subject: NAP EIR Comments

Dear Mr. Wycko,  
Cc: Supervisor Eric Mar

01 As an environmentalist and professor of engineering at Stanford who educates our next generation of engineers to design products and environments with sustainability in mind, and as a member of the Sierra club and avid city parks user, I'm writing to oppose the SF Recreation and Parks Department's plans to destroy 18,000+ trees and reintroduce "native" and endangered small plants in their stead. This plan would limit the SF humans' and their pets' access to the parks we pay tax dollars to RECREATE within. San Francisco prides itself (up to now) for having one of the highest population of dog owners/guardians of any city and it was exactly the welcoming attitude of the city and its parks to pets that attracted us to rent then buy in San Francisco. If the parks become less accessible, then San Francisco becomes a less attractive place to live and recreate.

02 The SF Recreation and Parks Department should remove "Recreation" from it's title if this plan goes forward. If restricted plants are planted and their areas then closed off for recreation, it seems this would not be under the mission of a city recreation and parks department but under a natural preservation zone. Such an area would not make sense to put in a densely populated city environment.

03 The EIR's arguments to remove off leash dog areas are not solid and ignore the actual usage of these areas by the city's inhabitants. The EIR's analysis is incomplete and bases many arguments on "potential" negative impacts not on data. Who is present in the parks in sunshine and inclement weather 365 days a year? People with dogs are.

With the health department's focus on obesity, how can a plan like this that limits access to recreation areas be accepted? People often acquire dogs to get them out into nature, get them exercising and get them socializing. It's scientific fact that dogs help reduce stress and blood pressure in people. Shouldn't we try to improve life where we live instead

Pruitt-1

03  
(Cont.)

of reduce it's quality? The SPCA argues that dogs need off leash areas to keep aggression down in dogs. The dog community in San Francisco is well known and provides great sense of belonging and community to many neighborhoods. To repeat a statistic I'm sure you know, there are more dogs in San Francisco than children. This reflects the importance of dogs in the lives of the city's inhabitants, voters, tax payers or however you want to describe us. EIR's are to take into consideration the impact on the communities that surround the areas in question and this one does not.

04

I ask how can a dog chase a ball on a leash? I have suffered some mobility issues over the past year due to injuries (as do many of our dog owning residents, especially the elderly or disabled, a large dog owning population in my observation), and if I had not had access to areas where my dog could run free, the situation would have been inhumane. While I could get around enough to pick up their waste, providing the necessary exercise was medically not recommended or possible.

If an alternative must be chosen, please support the Maintenance or Maximum Recreation Alternatives and please remember these are CITY parks, not Yosemite.

Thank you and I hope you truly consider the views of this city's most populous residents, the dog owners.

Beth Pruitt  
618 47th Ave  
San Francisco, CA 94121

Quinn-1



**Bill Wycko/CTYPLN/SFGOV**

10/24/2011 01:13 PM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject: Fw: quinn@cruzio.com

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/24/2011 01:13 PM —



**Chris Quinn**

**<quinn@cruzio.com>**

10/24/2011 11:50 AM

To: bill.wycko@sfgov.org

cc

Subject: quinn@cruzio.com

I am commenting on the NAP EIR.

First off, I suggest the San Francisco Government take a page out of what other local government agencies in the bay area are doing and adopt a public dialogue process. The process has strengthened the communities who have adopted it (Cupertino, Redwood City, San Carlos - to name a few) and given the economic shifts of our time, building community is what is needed most. I am no expert on public dialogue processes, only a fan. For more info, please refer to [www.publicdialogue.org](http://www.publicdialogue.org) - web site for the Public Dialogue Consortium, or reach out to the Communications department at San Francisco State University.

01 { That said, my request is the maintenance alternative of the EIR be adopted. It is the most realistic and healthy option.

02 { Also, do not restrict off leash access for dogs. Exclusion is not going to solve any problem. History shows, however, it always does. San Francisco is a tolerant, inclusive city, which is what makes this city feel more European than most. Go to London, off leash is the norm at all the wonderful parks. The experience increases the inhabitation of the parks, which are beautiful, and the gross of people and spread of dogs makes them safe and lovely. Restricting off leash access is simply discriminatory. Look at who is out there walking dogs. The majority are older people. Notice the sense of community this builds. These people are out getting exercise, meeting people, building community. Please, take actions that strengthen unity and community rather than tear it apart.

Thanks

Chris Quinn  
2147 42nd Avenue  
San Francisco, CA  
94116

Radetsky-1

**From:** [Bill Wycko](#)  
**To:** [Jessica Range](#)  
**Subject:** Fw: dog play areas: Please reduce the number and size  
**Date:** 10/03/2011 05:52 PM

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----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/03/2011 05:52 PM -----

**Ruth Radetsky**  
**<Ruth@Radetsky.org>**

To: bill.wycko@sfgov.org  
cc

10/03/2011 05:49 PM

Subject: dog play areas: Please reduce the number and size

01

I used to love walking on Bernal Hill, but I have had too many encounters with aggressive dogs with irresponsible owners, and no longer walk on Bernal Hill. I read on SFGate that the city is considering reducing or eliminating off-leash dog play on Bernal Hill. Please, please take this step. The city needs to consider the needs of people first, and animals second. There may be fewer play areas for dogs in the city than dog-owners would like, but dogs don't belong in the city, people do, and there are certainly too few outdoor play areas for people!

It is irresponsible to own a big dog in the city, and it is not surprising that people who are irresponsible enough to own a big dog in the city are not responsible enough to train their dogs to be safe sharers of the city's parks.

Thank you.

--  
Ruth Radetsky  
Math and Statistics teacher  
Balboa High School  
San Francisco, California, USA.

Radetsky.org

Raffaelli-1



**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 09:24 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: SFNAP review comments

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:25 AM -----



**Paulo Raffaelli**

**<pauloraff@gmail.com>**

10/29/2011 07:10 PM

To Bill.wycko@sfgov.org

cc

Subject SFNAP review comments

To Mr Wycko:

I am a long-time San Francisco resident - since 1990 - and a dog owner. When my spouse and I purchased a house in the city, we chose one due to its proximity to a park with off leash dog play areas. All of our dogs have been rescues, and tend to be larger than the average dog, those being harder to find homes for. If there had been no suitable park available, we would have moved out of the city, despite both owning businesses in the city.

01

I oppose, in the strongest terms, any expansion of the Natural Areas program at the expense of existing off-leash areas. Areas which are off-leash areas are multi-use; I see other people who are not dog owners using the park, and we all co-exist nicely. Designating the off-leash areas as Natural Areas would affect more people than just the dog owners.

It is disturbing to me that there is no way to propose new dog play areas, should any curtailment occur, and in any case the approval process is sure to take years and leave dog owners who own dogs now without recourse.

02

With this in mind, I ask you to implement the maintenance alternative and not the maximum restoration alternative or, for that matter, any alternative which reduces recreational space in our city. I would point out that adding recreational areas in Crocker Amazon playground has done wonders for the tenor of the park. It's a popular and welcoming spec compared to what it was five years ago.

Thank you,  
Paulo Raffaelli

Rafferty-1

Patrick Rafferty  
29 Bemis St.  
San Francisco, CA 94131  
415.584.3110  
[patrickra@aol.com](mailto:patrickra@aol.com)

RECEIVED  
OCT 27 2011  
CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
M F A

October 23, 2011

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

RE: Draft Environmental Impact Report for Natural Areas Management Plan

Dear Mr. Wycko,

I am writing on behalf of the Friends of Fairmont Park, an organization of neighbors who live in the area of the park. We have worked over the last few years with the San Francisco Parks & Recreation's Natural Areas Program to help restore our natural area. Under the supervision of the Natural Areas Program we have assisted with the implementation of the plan to 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 plantings and improvements we have accomplished are 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.

01 The Natural Areas Program is an innovative management plan to safeguard our City's Natural Areas. Under the leadership of Christopher Campbell and Lisa Wayne we have embraced the goal of returning Fairmont Plaza to a thriving eco system. We realize this goal will take time, but through our on going work parties and the guidance from Parks & Recreation we are enjoying the positive changes in our green space.

The Plan is the most cost effective method for managing resources and protecting these areas for future generations. It also engages the neighborhood in ongoing maintenance of the plaza. Our group has been inspired by the improvements and we are in discussions to work with the Parks Trust to set up an account to fund further restoration work in the park.

02 The plan provides clear direction to the City on how to prioritize management and restoration of our Natural Areas. Recently the Parks & Recreation in conjunction with the Natural Areas Program worked with PG&E to mitigate potentially disfiguring addition of power lines in our natural area. I have every confidence that they will have the same influence when the AT&T boxes tentatively scheduled for this green space are up for approval. These are but two examples of how they looked at a range of alternatives and the potential impacts for both natural and recreational amenities of the City's Natural Areas.

02 The Draft Environmental Impact Report for SNRAMP is an adequate, accurate and complete review of the plan. Our group looks forward to our ongoing work parties to improve Fairmont Park.

Sincerely,

  
Patrick Rafferty

Randt-1

**From:** [Bill Wycko](#)  
**To:** [Jessica Range](#)  
**Subject:** Fw: city life for dogs and pet owners  
**Date:** 10/04/2011 05:37 PM

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----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/04/2011 05:13 PM -----

**bill randt**  
**<randt\_bill@hotmail.com>** To: <bill.wycko@sfgov.org>  
 cc  
 10/04/2011 04:38 PM Subject: city life for dogs and pet owners

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

Dear Mr. Wycko,

01

I'm a pet/dog owner in the city of San Francisco, and I understand that there are park areas that may be closing soon--or are up to discussion regarding closure. I won't be able to attend the meeting on October 6, but I want to note my support for dog parks in the city: both on-leash and off-leash areas (for dogs under voice command); the GGNRA's newest policy amendments to reduce spaces for dogs has been very disconcerting as a pet owner. Places like Muir beach and other notable spots in the Bay Area may soon become off limits.

If the city has some agenda against pets, I hope it would reconsider its efforts. If the city is concerned about erosion control and restoring natural habitats, then I would hope some thoughtful balance would be struck. (However, I don't always believe that erosion is from overuse by pets.) If the city is going to close access to parks or pets, then it should consider making the areas off-limits to those who deface, destroy, and vandalize our local park facilities. I think those individuals do more harm to a healthy city.

I'm not sure why the city wants to reduce or close certain DPAs, but if it's due to budgetary constraints, then perhaps a volunteer resource could be put into place, including getting local groups (e.g., Boy Scouts of America) involved for service projects. I read Jennifer Scarlett's piece on SF gate. She stated: "Closing all DPAs in Management Areas 1 and 2 would virtually eliminate DPAs at Bernal Hill, Buena Vista, Golden Gate Park Southeast, and McLaren-Shelley Drive. And if closing some DPAs leads to greater usage in the remaining play areas, "any observed impacts of dog use on sensitive natural communities" would be addressed by closing or reducing *those* DPAs." I wish the city would reconsider restrictions to those areas.

I will await the outcome of the decisions, and my voting powers that be will go toward those who I see as dog-friendly. The city needs more dog parks, not fewer. Thank you for your attention to this.

Sincerely,

Bill Randt



Ray-1

**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 04:07 PM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: NAP EIR Comments from the Director of San Francisco Wildlife Hospital

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 04:08 PM -----

**Jamie Ray**

&lt;jamie\_ray@comcast.net&gt;

10/31/2011 04:01 PM

To bill.wycko@sfgov.org

cc

Subject NAP EIR Comments from the Director of San Francisco Wildlife Hospital

October 31, 2011

Dear Mr. Wycko,

My name is Jamie Ray, I am the founder and director of San Francisco's first and only wildlife hospital, San Francisco Rescued Orphan Mammal Program (SFROMP.org)

SF ROMP was founded in 2001 with the following mission statement: Dedicated to preserving and enhancing San Francisco's rich biodiversity and increasing public appreciation of our native wildlife.

SF ROMP rehabilitates injured and orphaned wildlife under license of the California Department of Fish and Game, works on state and local issues that effect wildlife, and provide educational programs about the wildlife we share our environment with, including a helpline that helps residents peacefully coexist with wildlife. SF ROMP has worked with Recreation and Parks Capital Improvements Division on wildlife management plans, mitigation measures for wildlife effected by projects, and planted thousands of plants that provide habitat for wildlife in our local parks. I define habitat plants as those plants that provide the best food and/or shelter value for wildlife. With very few pockets of park space that has not been trail blazed by people and dogs, it is my view that the best policy is to promote the planting of plants that provide the best habitat for wildlife, and in particular, dense and/or thorny plants that provide wildlife with protection from people and dogs, and safe nesting and denning sites. When habitat plants are also aesthetically pleasing, as they often are, this is a win-win for everyone. We're so fortunate in San Francisco to be able to grow drought tolerant plants from Mediterranean regions, Australia, New Zealand, South Africa and even the cloud forest regions of Central and South America! The list of SF native plants is a short one to be sure. The list of native trees contains four species, including two that need to grow in or near water. (willow and buckeye) Oak and a native plum tree are the only other trees native to San Francisco. To limit planting to these few plants is a net loss for wildlife and the enjoyment of park goers.

Thank you for supporting the No Project Alternative.

01 { I support the No Project Alternative. NAP jurisdiction should not be expanded beyond the areas of their detrimental activities. Most plants require at least one or two summer waterings to establish. The NAP policy to not water any of the plants they install is instrumental in the monumental failure of many of their planted areas.

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.



Ray-1

- 02 (Cont.) { 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 would like more Rec and Park gardeners to be 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.

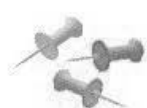
Thank You

Sincerely,

Jamie Ray, Director

SF ROMP wildlife rehabilitation

Rehling-1

**Bill Wycko/CTYPLN/SFGOV**

05/16/2012 09:41 AM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc:

bcc:

Subject: Fw: NAP draft EIR

History:

This message has been forwarded.

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 05/16/2012 09:41 AM —

**Lu Rehling**  
<lurehling@gmail.com>

05/15/2012 05:42 PM

Please respond to  
LuRehling@gmail.com

To: bill.wycko@sfgov.org

cc: "sean.elsbernd" <Sean.Elsbernd@sfgov.org>,  
mayoredwinlee@sfgov.org

Subject: NAP draft EIR

Hello, Bill Wycko--As Environmental Review Officer for the city, I expect that you already are aware of concerns about the NAP draft EIR. I want to add my voice to those of many others who feel that the draft EIR does not accurately represent either NAP's agenda or the likely outcomes of its plans.

01

What NAP plans to do is not sound environmental stewardship, as claimed, but a damaging course of action that could do lasting harm to beloved and much-used urban forests and other recreation areas within the city. The draft EIR minimizes and misleads, not addressing some critical concerns and misrepresenting others, without consideration of the full range of expert opinion and without sufficiently considering community, ecological, and property impacts. The draft EIR does not acknowledge how reduction of trails and of dog-friendly acreage will affect the community, nor does the EIR accurately represent the potential consequences of using toxic pesticides on the health of children. Of course, these pesticides also threaten wildlife directly, and that wildlife also is threatened by the other changes to habitat that the NAP plan includes. The draft EIR does not appropriately address legitimate concerns about erosion, loss of windbreak and shade, and aesthetic consequences of NAP's plans. The draft EIR seems too informed by the voices of NAP staffers protecting their office and their budget and not sufficiently informed by those outside of NAP, but familiar with the areas and issues under discussion. I hope that you will seek out more sources and listen to them objectively, while bearing in mind the well-being of all residents and the importance of managing our parkland in a balanced way.

02

One other thing: I live in Miraloma Park, just opposite the Stanford Reservoir which is just below Mt. Davidson Park. I should have been notified about NAP's plans and, specifically, about the methods that NAP would take to impose its extremist vision on my neighborhood and others in the city. Therefore, I also want to bring your attention to that failure to properly inform the public, especially those living in areas most affected by NAP's plans.

03

Thanks for listening. I am copying the mayor and the supervisor for this district on this message,

Rehling-1

03  
(Cont.) { so that they also will be aware of my concerns. Although the supervisor has been quoted in the *SF Chronicle* as dismissing the concerns of citizens such as me for being so much "rhetoric" and implying exaggeration, the fact is that approval of the EIR as it stands would privilege NAP to execute its misguided plan as it saw fit and on its own discretionary time frame. That seems reason enough to me to sound an alarm. Of course, the huge cost of NAP's plans at a time when the budget should be managed most carefully also is a real shame.--Lu Rehling

-----  
Lu Rehling  
751 Rockdale Drive  
San Francisco, CA 94127  
650-208-8678 (cell)  
[LuRehling@gmail.com](mailto:LuRehling@gmail.com)  
-----

Reichardt-1

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

October 9, 2011

Dear Mr. Bill Wycko,

RECEIVED

OCT 17 2011

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

I am writing in regards to the National Areas Program's proposed EIR.

01 { I support the Maintenance Alternative in the EIR. While I am a hundred percent for the  
02 { betterment of the natural areas in the City of San Francisco, the EIR identifying the Maximum  
Restoration Alternative as the "Environmentally Superior Alternative" is contradictory to the rest of the  
evidence presented in the document. I am particularly disappointed to learn that the NAS management  
plan calls for the destruction of healthy trees even after failed attempts to sustain the native plants. It  
seems unreasonable to spend any more of taxpayers' money to bring back the plants that simply don't  
do well in these places that are surrounded by populated urban areas.

03 { The fact that this is an urban city also brings to question the toxic herbicides that are used in the  
natural areas concerned, as this might cause troubling health risks to park users including seniors and  
children. The plan that calls for the restrictions of trail access in the City also doesn't seem to take into  
account the recreational needs of its residents, whose health clearly depends on the activities these parks  
provide. The closing of legal off-leash spaces will also pose a tremendous threat to the behavioral health  
of dogs that live within the city limits, which are estimated 150,000 total and more than that of the  
estimated 120,000 children in the City. With the proposed GGNRA plan to close 90% of the off-leash  
access out of that 1% now available to dogs, keeping city parks open is all the more important to counter  
the negative effects that the federal government's plan may trigger.

Although I am unfamiliar with the financial costs that are associated with the four alternatives in  
the EIR, I trust that the SF Recreation and Park Department will allocate the appropriate funding to  
make the Maintenance Alternative possible. Thousands of people as well as their dogs' health depend on  
this park. Please do not take it away.

Thank you for your consideration.

Sincerely,



Kathy Reichardt

Reque-1

**From:** [Bill Wycko](#)  
**To:** [Jessica Range](#)  
**Subject:** Fw: Restricting Dog Play Areas  
**Date:** 10/03/2011 04:38 PM

---

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/03/2011 04:38 PM -----

**Peter Reque**  
**<petereque@gmail.com>**

To: bill.wycko@sfgov.org  
cc

10/03/2011 02:13 PM

Subject: Restricting Dog Play Areas

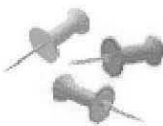
Dear Sir,

01

I urge the city not to further restrict the areas where dogs are allowed to run free. Far and away the majority of dogs are pleasant and friendly. A few dogs have been badly trained, but they can be (slowly) removed from the parks. And some people just don't like dogs, or are worried about small children. These folks can easily avoid the free dog areas, there's a lot more park space just for people. I'm not a dog owner/guardian, but I do like dogs.

Thank you,  
Peter Reque  
1073 Bush St  
SF, CA 94109

RileyHoppes-1



**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 09:11 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: Off-Leash Policy

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:11 AM -----



**Donna Riley**

**<dlrdlh@pacbell.net>**

10/31/2011 07:28 AM

To bill.wycko@sfgov.org

cc David.Campos@sfgov.org

Subject Off-Leash Policy

01

Dear Bill - I'm a 17-year San Francisco resident, and for the last 8 years, I've lived in Bernal Heights. My dog and I enjoy Bernal Hill daily, and we frequent many other city parks. Dog owners are some of the most responsible citizens in our city. We clean up after ourselves and our dogs, and we take time via cleanup days to catch those few piles that we may have missed. We respect our community and our parks and cherish them more than any other San Francisco citizens. It's not a good use of police time to chase after and ticket dog owners. There are far more significant issues to take up police and park service time, money and energy.

Of all of my political representatives, Supervisor Campos is the only one who never responds to emails with significant issues. Nonetheless, I'm copying him in here. It may sound cliché, but I have a dog, I'm active in my community, and I vote. The policy you propose is unreasonable, unenforceable, poorly conceived and not in the interests of the majority of San Franciscans. Thank you for your consideration.

Regards -

Donna Riley Hoppes  
128 Montcalm St.  
San Francisco, CA 94110  
415 920 9861  
dlrdlh@pacbell.net

Risk-1

May 19, 2012

RECEIVED

MAY 21 2012

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

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

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

Dear Mr. Wycko:

We bought our home in Miraloma Park in 1972 and raised our family here. One of our favorite activities has always been to walk the trails through the Mt. Davidson Forest. So it came as quite a shock to us to learn that the San Francisco Recreation and Parks Department plans to remove large numbers of trees from the forested side of the mountain.

- 01 We were first informed of those plans in February 2012 on a walk led by local historian Jacquie Proctor. It was most disconcerting for us to be told that the NAP plan has been under consideration since 1997, was finalized in 2006, and that the plan's DEIR is currently under review. Even though we were the ones who would be most affected by those plans, the Recreation and Parks Department has never organized any community informational meetings in our neighborhood or posted any signs on the main forest trail entrances to notify us of those plans.

Here are our major objections to the Natural Areas Plan for Mt. Davidson:

- 02 \* The plan would replace 1600 or more mature and healthy trees in the middle third of the 30-acre Mt. Davidson Forest with "native scrub and grassland habitats." (MA-1c, MA-2c and MA-2e on the attached SNRAMP map) Native plant enthusiasts already have access to the entire open eastern slope of Mt. Davidson. This past year a huge swath of trees was removed by the Water Department when they installed the new pipeline to the water tank at the top of the mountain. We do not want any more sections of the forest to be removed.
- 03 \* According to the NAP plan, some 'non-native trees' would be removed and replaced with 'native' species. But there is no guarantee that those new trees will be planted in the same location, or even on Mt. Davidson. And there is a strong likelihood that 'native' trees such as scrub oaks may not survive on the windy western slope of Mt. Davidson. If there are hazardous or unhealthy eucalyptus trees that need to be removed, we ask that they be replaced with Monterey Cypress, a beautiful non-native tree that already thrives in this location.

Risk-1

- 04 { \* Contrary to statements in the DEIR, we believe that removing 1600 trees would have a significant negative impact on the Mt. Davidson Forest. It would mean increased wind exposure, increased erosion, reduced carbon dioxide absorption, and loss of animal and bird habitat. And it would certainly alter our woodland hiking experience.
- 05 { \* Each year the Natural Areas Program relies on the use of larger and larger quantities of four toxic herbicides classified by the City as Tier I (Most Hazardous) and Tier II (More Hazardous) to prevent "invasive" plants from re-establishing themselves. All of these chemicals have been associated with serious health problems in animal and human populations. The DEIR does not specify how much pesticide will be used to maintain Mt. Davidson as a "Natural Area." On our recent walks we saw several signs posted to notify the public that Imazapyr had been applied in the area. This is a new pesticide. What is known about it is that it does not degrade so it travels through the environment. It's a neurotoxin that can cause irreversible eye damage. And it has been banned in the EU since 2002.
- 06 { \* The DEIR does not include any cost estimate for implementing the SNRAMP and does not explain how it will be funded. We object to spending scarce park funds on the Natural Areas Program when other essential services are being cut, Recreation Directors have been laid off, and fees are being charged for use of formerly free Park facilities.
- 07 { In summary, we object strongly to the Significant Natural Areas Management Plan proposals for Mt. Davidson and to the lack of community involvement in the drafting of those plans. We also contend that the Draft Environmental Impact Report of the SNRAMP is deficient in many respects.

Thank you for extending the comment period for the DEIR. We know that most of our neighbors are as concerned about the future of Mt. Davidson as we are. We value the Mt. Davidson Forest as a quiet sanctuary in the midst of our dense urban area. Please help us to keep it that way.

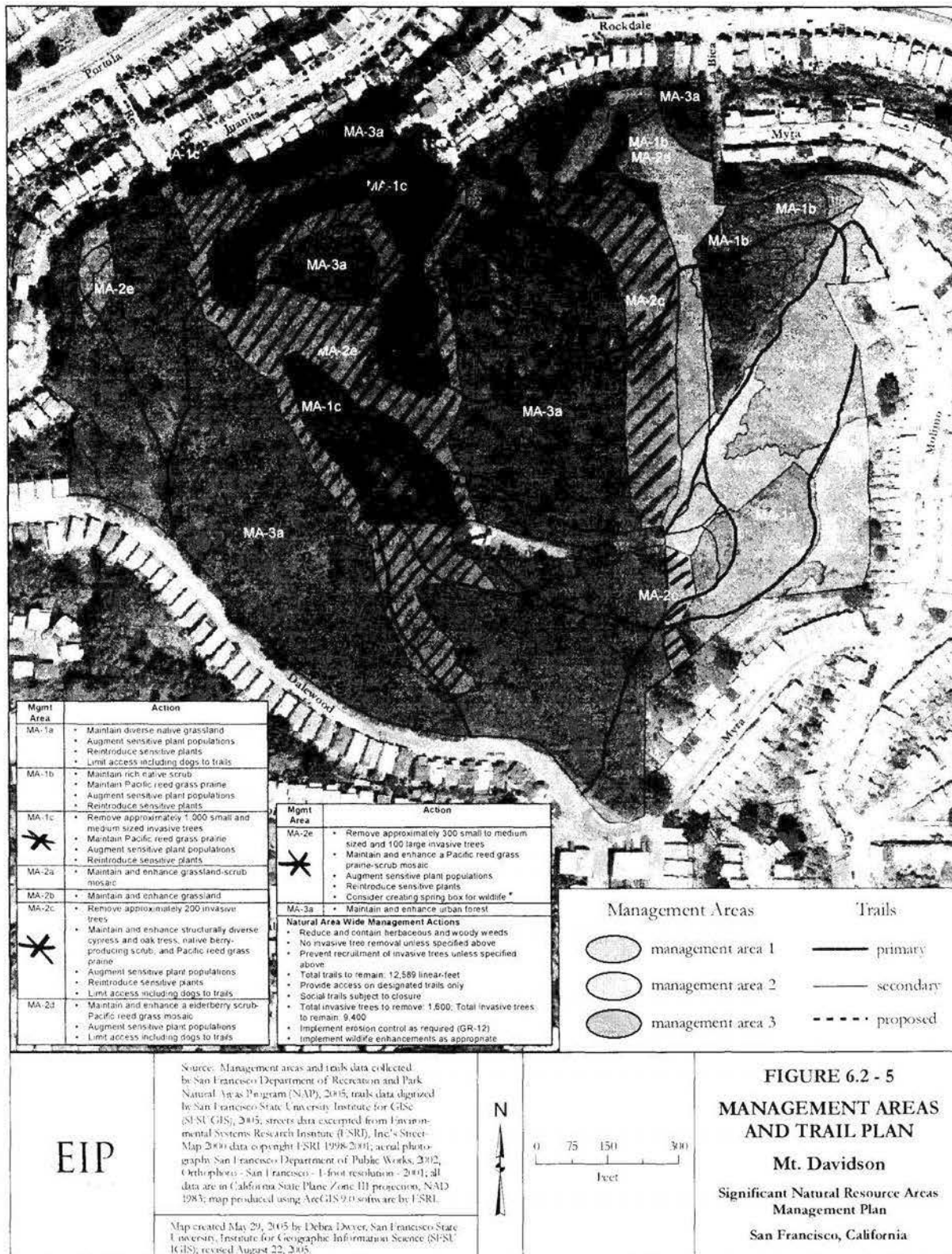
Sincerely,



Jane and Jerry Risk  
64 El Sereno Court  
San Francisco, CA 94127



Risk-1



Rodriguez-1



**Bill Wycko/CTYPLN/SFGOV**

10/27/2011 11:22 AM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject: Fw: Keep our parks for DOGS AND PEOPLE

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/27/2011 11:23 AM -----



**Marilyn Ines Rodriguez**  
<mirstudio@comcast.net>

10/27/2011 10:25 AM

To: bill.wycko@sfgov.org

cc

Subject: Keep our parks for DOGS AND PEOPLE

To whom it may concern:

Re: NO LEASH LAW

01

I am a responsible dog owner. I represent 99% of all dog owners. There is only a small percentage that gives us a bad name, as in any area. If my dog can't run around free, I don't know how I would be able to consume her energy? Dogs need to RUN freely! Secondly, these walks are as much for my dog's health as they are for mine. Please let's keep our parks for all, dogs and people.

Thank you,  
Marilyn I. Rodriguez

**Marilyn Ines Rodriguez**  
Master Sculptor

Rodriguez-1



415-948-3099  
mirstudio@comcast.net

For more information about Fine Art Sculptures, Family & Pet Portraits,  
Sculpture Classes and upcoming Book please visit <http://www.marilynrodriguez.com>

Rogers-1

October 31, 2011

**Alder Landscape Architecture**

Glenn Rogers, ASLA  
3425 Alemany Blvd.  
San Francisco, CA 94132  
Phone/fax 415 333 9317

**SF Planning Department**

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

Dear Sir,

- 01 { I would like to ask you to realize the importance of the 'Significant Natural Resource Areas Management Plan' for the City of San Francisco, please. With over 150 to 250 species being lost daily to extinction, preserving of our wild area or natural habitats, is essential. San Francisco, as you know, has many species of plants found no where else. Along with these unique plants are fauna that depend on them exclusively, i.e. the 'Hairstreak Butterfly'. Therefore, preserving these wild areas is even more important.
- 02 { May I suggest, so that San Francisco's biodiversity is not threatened, that you separate the 'Sharp Park ' project from the 'San Francisco Natural Areas Plan', please. Furthermore, I believe there should be professional management of our City's natural areas and a program of ecological restoration for the City, also.

In passing, I would like to state that golf courses environmentally are very destructive to the land. The tremendous quantities of water to keep a golf course alive is unsustainable, not to mention, the heavy use of fertilizers to keep the turf green, is destructive. Fertilizers, when they are part of rain water run off, can cause algae blooms in bodies of water, can pollute water causing it to become toxic and can cause other environmental damages. Most importantly, however, is that the grass monoculture, provides no habitat for fauna. Really, isn't it time for golf courses to be realized to be what they are, an energy trap, where all the work and effort to keep the golf courses desirable, is destroying the environment in so many ways!

I hope you will consider these suggestions. Thank you for your time.

Sincerely,

Glenn Rogers, ASLA  
Landscape Architect  
License 3223

Roman-1



**Bill Wycko/CTYPLN/SFGOV**

10/27/2011 11:22 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: GGNRA Dog Policy

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/27/2011 11:22 AM -----



**"J. Roman"**

**<cartman743@sbcglobal.net>**

To "bill.wycko@sfgov.org" <bill.wycko@sfgov.org>

cc

10/27/2011 10:31 AM

Please respond to

"J. Roman"

<cartman743@sbcglobal.net>

Subject GGNRA Dog Policy

01

Please support off-leash dog walking in the GGNRA and NOT limit current areas.

I walk my dog daily, yes daily rain or shine, in either Crissy Field or Land's End. We enjoy walking together off-leash. My dog is trained to remain nearby and to respond to my recall. I pick up her waste and we keep to the trails.

The NAP EIR does not convince me putting dogs on leash will have a favorable impact nor does off-leash walking have any unfavorable impact. In addition, I've observed much unfavorable impact by people using these areas such as walking through native plants without regard as well as other negative items such as loud music or leaving behind trash. It seems that there are many negative aspects attributed to off-leash dog walking and dog owners that simply are not true or untested.

Confining all dogs to smaller off-leash areas will not be tenable. There simply does not seem to be enough land devoted to be able to accommodate all the dogs in the city during reasonably used times. Off-leash space is needed and some workable manner can be accommodated.

Please contact me if you need any more detail. I am happy to share.

Jonathan Roman  
San Francisco, CA 94121

Rosenthal-1

1616 Taylor Street, Apt.#3  
San Francisco, Ca 94133-3635  
yb09nr@yahoo.com  
October 6, 2011

**RECEIVED**

OCT 07 2011

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

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

Re: DEIR SNRAMP

Dear Mr. Wycko:

As a thirty year resident of San Francisco, a volunteer with the Natural Areas Program for the last eight years, and a member of the Yerba Buena Chapter of the California Native Plant Society, I have been patiently waiting for the DEIR of the SNAMP to be released. I am very familiar with the issues the DEIR addresses because I spend twenty hours a month working in the natural areas of our parks.

After reading the report in detail, I believe the DEIR to be adequate, accurate, and complete. It is not a radical plan and lays out a reasonable, conservative approach to natural resources management, and considers a broad range of potential impacts to our City's resources.

01 The report should be accepted for the following reasons. It proposes mitigation measures to address impacts where possible. It is based on detailed studies and scientific experts. It is consistent with several directives: the Recreation and Open Space Element (ROSE), the Public Utilities Commission (SFPUC) water saving mandates, and the City's Sustainability Plan. It also looks at a range of alternatives and discusses the potential impacts for both natural and recreational amenities of the City's Natural Areas, which are in dire need of the protection this management plan addresses.

This report is long overdue. I hope it will be implemented in a timely manner.

Thank you for the opportunity to express my opinion,

*Nancy's Rosenthal*

Nancy Rosenthal

Rotter-E-1



**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 09:20 AM

To Jessica Range/CTYPLN/SFGOV@sfgov

cc

bcc

Subject Fw: Draft EIR

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:21 AM -----



**"Belgrave House"**

**<neff@belgravehouse.com>**

10/30/2011 03:00 PM

To "Bill Wycko" <bill.wycko@sfgov.org>

cc

Subject Draft EIR

October 30, 2001

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

RE: Draft Environmental Impact Report for the Natural Areas Resource Management Plan

Dear Mr. Wycko:

01

Contrary to what it says on page 2 of the Summary of the EIR, the preferred alternative of the EIR is the Maintenance Alternative. And we agree with that choice.

We live between two "natural areas" at either end of Belgrave Avenue. Tank Hill and the Interior Greenbelt have both seen the work of NAP—where many non-native trees have been destroyed and replacement trees (on Tank Hill) have either not survived or have achieved no real growth. In fact, NAP no longer works on Tank Hill, though neighbors were volunteering to keep an eye on whether they were living up to their promise not to remove any more eucalyptus trees until replacement trees had grown.

02

In the Interior Greenbelt many healthy, young trees were destroyed to develop a trail under the auspices of the Natural Areas Program. So claims that only dead, dying, diseased trees would be destroyed for implementation of the management plan are totally untrue.

03

And we know that the claim that every destroyed tree will be replaced by a native tree is not possible because we've seen what happened on Tank Hill.

Rotter-E-1

04

There is no way the NAP could expand their efforts to another 42% of the parkland in San Francisco, which is what the Maximum Restoration Alternative would require. The city does not have the resources, nor should it have the will, to destroy healthy trees that flourish here—just because they aren't native.

On Tank Hill we enjoy the native wildflowers that thrive under the non-native trees, and we are grateful that no pesticides are being used there to “correct” the situation.

Thank you for your consideration.

Elizabeth W. Rotter  
190 Belgrave Avenue  
San Francisco, CA 94117-4228  
415.661.5025



Rotter-P-1

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

10-19-2011 **RECEIVED**

OCT 21 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. Wycho:

The purported reason for the creation of the Natural Areas Program (NAP) within the Recreation and Parks Department (RPD) was to provide ecological and scientific management for selected areas of parkland within San Francisco. The essential work of NAP has been an attempt employ restoration ecology to restore lands in their control to an imagined condition at some time in the past (before a European presence?). If this program was to preserve 'native' plant species within the evolving ecological environment I believe there would be little opposition. However, NAP demands that the evolutionary nature of the environment be destroyed, that is to say Eucalyptus and other 'non-native' plants have to go. Wholesale habitat restoration and conversion is neither scientific nor environmentally sound. That program requires destruction of massive numbers of healthy trees, eradication of large areas of animal habitat, applications of hazardous herbicides over long periods of time.

01

In the Draft Environmental Impact Report (DEIR) that is now under consideration, four different alternatives are given: Proposed Project, Maximum Recreation, Maximum Restoration, Maintenance. ONLY the Maintenance Option is a supportable ecological program, as the DEIR states:

"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.**" (page 525/6, emphasis added.)

02

We had the good fortune to read a letter (10-6-11) to you on this matter from Professor Arthur M. Shapiro, Distinguished Professor of Evolution and Ecology at UC Davis. We hope you will have read his letter to gain some understanding of the long range environmental issues at stake. The NAP program of massive tree removal, animal habitat destruction, extensive herbicide use is not a sound policy under the conditions of global environmental changes that have been evident for many years. We ignore this at great peril.

The California Environmental Quality Act (CEQA) Sec. 21002 states:

"...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 environments effects of such projects, ..."

In simple language only the Maintenance Alternative is a legal alternative.

03

One alternative for San Francisco not proposed is shutting NAP down, or redirecting NAP in a direction of co-habitation, preserving 'native' plants in an evolving environment.

Sincerely,  
  
Paul Rötter  
190 Belgrave Avenue  
San Francisco, CA 94117

Saino-1

**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 09:21 AM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject: Fw: Off-leash access comment on Natural Areas Program (NAP) plan

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:22 AM -----

**Celia Saino**

&lt;celia.saino@gmail.com&gt;

10/30/2011 09:33 AM

To: Bill.wycko@sfgov.org

cc

Subject: Off-leash access comment on Natural Areas Program (NAP) plan

01

I am writing to request that the proposed change of off-leash access to San Francisco parks such as Bernal be modified to allow off-leash access but increase signage warning dogs and people about sensitive plant areas. To demonstrate the benefits of raising awareness rather than legally restricting access, please read the following summary of two very different experiences I had in local parks.

#### Pulgas Ridge Open Space Preserve in San Mateo:

About a year ago I was walking my dog in the Pulgas Ridge Open Space Preserve in San Mateo.

I had walked in the park a couple of times before with my friends and their dogs. We are all literate women who kept our dogs on leash until one of us who used the park frequently told us that we were in an off-leash area. On this particular day, a man walking in the park had warned us that a ranger was ticketing for letting dogs off-leash in the restricted areas, and we paid particular attention to the signs to try to make sure we were leashing the required areas. A park ranger appeared during our walk and told me that she was giving me a ticket for having my dog off-leash. I explained that I and my friends were all trying to observe the rules, and that none of us had seen any signs noting the end of the off-leash area. The ranger stated the signs were clearly marked and was unsympathetic even though we pointed out that if three women who were all trying to observe the signs had repeatedly missed them even after walking in the parks many times. I received a fine of over \$200 and refuse to go back to the park because I still don't understand where the boundaries of the off-leash areas are, and my experience was so negative that I don't want anything to do with the park.

#### Bernal Heights Park

I was walking my dog in Bernal Heights Park a few months ago. A city employee doing plantings told me that she had a dog herself, and petted my dog. She pointed out the plantings she had just put in, and asked me politely to keep my dog out of that area. I was happy to comply. My dog and I stayed out of the restricted area as requested.

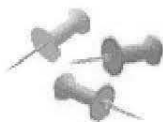
I regularly visit Bernal Heights Park but would visit it much less frequently if I had to constantly worry that if my dog chased a ball or another dog for a few seconds outside the designated area that I would receive another huge fine. If the sensitive areas were clearly marked, I would be happy to steer my dog away from those areas. I understand that plants are important too, and would be happy to help protect those areas if I had better information that was clearly marked.

Thank you,

--Celia Saino

San Francisco, CA 94114

Salamone-1



**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 09:27 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: Please help the dog owners of SF

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:28 AM -----



**Lisa Salamone**

**<gesparky9@sbcglobal.net>**

10/29/2011 10:01 AM

To bill.wycko@sfgov.org

cc

Subject Please help the dog owners of SF

Dear Mr. Wycko,

01

I am sure that you have heard all of the comments from hundreds of dog owners in Sf but here is just one more. I adopted my dog over six years ago during a time when both of my parents were quite ill and ultimately passed away. The breaks that my dog and I took at Fort Funston and Chrissey Field beach walk together for a run off leash was liberating for both of us and quite literally helped us to remain strong for my parents.

Please help us not lose this most magnificent gift to allow us all to be free. I do understand with a great gift comes great responsibility to be good custodians of the land which I am. I will also continue to be vigilant and outspoken to those that I see breaking the rules.

Please help us to save this gift for the 99% who do a good job instead of removing it for the 1% who are just not careful people.

Yours sincerely ,

Lisa Salamone

Saltzer-Lamb -1



**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 11:44 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: city dogs deserve the space to run and play

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 11:44 AM -----



**saltzerlamb@comcast.net**

10/31/2011 11:00 AM

To bill.wycko@sfgov.org

cc

Subject city dogs deserve the space to run and play

Hi Bill,

01

As a San Francisco resident (and a City employee), I would like to ask you for your help in supporting the Maintenance Alternative plan as an answer to the issue facing SF dog owners and walkers.

Thank you,

Vicki Saltzer-Lamb  
Glen Park resident

Schlund-1



**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 11:41 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: NAP comments

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 11:42 AM -----



**"Claus Schlund \HGM\"**

**<claus@HellGateModels.com**

**>**

10/31/2011 11:36 AM

To <bill.wycko@sfgov.org>

cc

Subject NAP comments

Hi,

I'd like to post a few comments regarding the NAP program

01

(1) NAP reduces the amount of space available for off-leash dog recreation. The dog population is increasing, so this is a clear step in the wrong direction

02

(2) The NAP program makes use of herbicides - this is an unhealthy and unwise decision for land that is designated for park and recreational use

03

(3) The NAP program removes non-native vegetation, including mature trees. While these plants and mature trees might not be native, they are beautiful and desirable. It does not seem clear why replacing them with native species is a desirable goal.

04

(4) The NAP program will produce an ongoing maintenance burden - since the pre-existing native species were displaced by the current non-natives, it seems logical that once planted native species will once again be displaced in a matter of time unless ongoing maintenance is applied. Maintenance = dollars last time I checked. Is this a good use of our limited funds?

Thanks for your time - CLaus Schlund  
Bernal Hts

Schmoll-1



**Jeanie Poling/CTYPLN/SFGOV**

10/31/2011 01:06 PM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: Natural Areas Plan Draft EIR

----- Forwarded by Jeanie Poling/CTYPLN/SFGOV on 10/31/2011 01:06 PM -----



**Gisela Schmoll**  
<[g@schmolldesign.com](mailto:g@schmolldesign.com)>

10/31/2011 12:42 PM

To jeanie.poling@sfgov.org

cc

Subject Natural Areas Plan Draft EIR

01

I am writing to you to ask you in support of the main goals of the Natural Areas Plan. Also, I am urging you to separate out Sharp Park from the Natural Areas Plan so that we can move forward with restoring and preserving San Francisco's natural areas and biodiversity.

gisela schmoll

[g@schmolldesign.com](mailto:g@schmolldesign.com)

415.474.3467 tel

415.871.0534 cell on skype

Scott-1



**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 01:18 PM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: Comments on Natural Areas Program

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 01:19 PM -----



**"Jan Scott"**

<jan@qb-soft.com>

10/31/2011 12:10 PM

To <bill.wycko@sfgov.org>

cc "Carmen Chu" <Carmen.Chu@sfgov.org>, "David Campos" <David.Campos@sfgov.org>, "David Chiu" <David.Chiu@sfgov.org>, <Eric.L.Mar@sfgov.org>, <Jane.Kim@sfgov.org>, "John Avalos" <John.Avalos@sfgov.org>, "Malia Cohen" <Malia.cohen@sfgov.org>, <Mark.Farrell@sfgov.org>, "Scott Weiner" <Scott.Weiner@sfgov.org>, <Sean.Elsbernd@sfgov.org>, <Ross.Mirkarimi@sfgov.org>, <mayoredwinlee@sfgov.org>

Subject Comments on Natural Areas Program

- 01 [ Expanding the Natural Areas Program as has been proposed is a wrong-headed idea that will waste scarce budget dollars and will not serve a majority of city residents.
- 02 [ The NAP attempts to turn the clock back to a time when San Francisco was primarily sand dunes. Most of us enjoy our parks with large non-native, but healthy trees. Not enough money is allocated to maintenance of the existing natural areas, resulting in high use of herbicides and weedy unattractive areas. Why does anyone want more of that?
- 03 [ Native Areas are off-limits to people, dogs, and almost any type of recreation. The new proposal could close up to 80% of the legal off-leash space in SF city parks. Added to the new dog management proposal by the GGNRA, the limits on dogs would be severe and unwarranted considering the number of people who wish to walk their dogs in city parks and pay to maintain those parks.
- 04 [ While I am not opposed to preserving existing areas of natural habitat, I am strongly opposed to cutting down non-native trees, using heavy doses of herbicides, destroying existing non-native areas that are home to birds and animals that have adapted, and removing large areas of our parks from recreational use by people and dogs.

Thank you,  
Joanne Scott  
40-year resident and voter, San Francisco

Sebastian-1

**Bock, John**

---

**From:** Jessica.Range@sfgov.org  
**Sent:** Monday, November 07, 2011 9:30 AM  
**To:** Bock, John  
**Subject:** Fw: Save current off leash areas for Dogs

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](http://www.sfplanning.org)

----- Forwarded by Jessica Range/CTYPLN/SFGOV on 11/07/2011 09:30 AM -----

Bill  
Wycko/CTYPLN/SFGO  
V  
To  
Jessica Range/CTYPLN/SFGOV@SFGOV  
11/07/2011 09:27 AM  
cc  
Subject  
Fw: Save current off leash areas  
for Dogs

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 11/07/2011 09:28 AM -----

Sandi Sebastian  
<ssebasti@byer.co  
m>  
To  
"bill.wycko@sfgov.org"  
11/04/2011 02:01 PM  
<bill.wycko@sfgov.org>  
cc  
"sandi@vinlan.com"  
<sandi@vinlan.com>  
Subject  
Save current off leash areas for  
Dogs

Dear Mr. Wycko...,

01 { Please save current off leash areas for Dogs. Also add more since there is not enough.  
There are many dog owners that follow rules and there have been more & more places posted in neighborhood parks:  
No Dogs Allowed.

Thank-you,  
Sandi Sebastian



Shapiro-1

**UNIVERSITY OF CALIFORNIA, DAVIS**  
**Department of Evolution and Ecology**

October 6, 2011

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

**RECEIVED**

OCT 07 2011

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

**Re: DRAFT EIR, NATURAL AREAS PROGRAM**

Dear Mr. Wycko:

Consistent with the policy of the University of California, I wish to state at the outset that the opinions stated in this letter are my own and should not be construed as being those of the Regents, the University of California, or any administrative entity thereof. My affiliation is presented for purposes of identification only. However, my academic qualifications are relevant to what I am about to say. I am a professional ecologist (B.A. University of Pennsylvania, Ph.D. Cornell University) and have been on the faculty of U.C. Davis since 1971, where I have taught General Ecology, Evolutionary Ecology, Community Ecology, Philosophy of Biology, Biogeography, Tropical Ecology, Paleoecology, Global Change, Chemical Ecology, and Principles of Systematics. I have trained some 15 Ph.D.s, many of whom are now tenured faculty at institutions including the University of Massachusetts, University of Tennessee, University of Nevada-Reno, Texas State University, and Long Beach State University, and some of whom are now in government agencies or in private consulting or industry. I am an or the author of some 350 scientific publications and reviews. The point is that I do have the *bona fides* to say what I am about to say.

At a time when public funds are exceedingly scarce and strict prioritization is mandatory, I am frankly appalled that San Francisco is considering major expenditures directed toward so-called "restoration ecology." "Restoration ecology" is a euphemism for a kind of gardening informed by an almost cultish veneration of the "native" and abhorrence of the naturalized, which is commonly characterized as "invasive." Let me make this clear: *neither "restoration" nor conservation can be mandated by science—only informed by it.* The decision of what actions to take may be motivated by many things, including politics, esthetics, economics and even religion, but it cannot be science-driven.

In the case of "restoration ecology," the goal is the creation of a simulacrum of what is believed to have been present at some (essentially arbitrary) point in the past. I say a simulacrum, because almost always there are no studies of what was actually there from a functional standpoint; usually there are no studies at all beyond the merely (and superficially) descriptive. Whatever the reason for desiring to create

Shapiro-1

such a simulacrum, it must be recognized that it is just as much a garden as any home rock garden and will almost never be capable of being self-sustaining without constant maintenance; it is *not going to be a “natural,” self-regulating ecosystem*. The reason for that is that the ground rules today are not those that obtained when the prototype is thought to have existed. The context has changed; the climate has changed; the pool of potential colonizing species has changed, often drastically. Attempts to “restore” prairie in the upper Midwest in the face of European Blackthorn invasion have proven Sisyphean. And they are the norm, not the exception.

The creation of small, easily managed, and educational simulacra of presumed pre-European vegetation on San Francisco public lands is a thoroughly worthwhile and, to me, desirable project. *Wholesale habitat conversion is not.*

A significant reaction against the excesses of the “native plant movement” is setting up within the profession of ecology, and there has been a recent spate of articles arguing that hostility to “invasives” has gone too far—that many exotic species are providing valuable ecological services and that, as in cases I have studied and published on, in the altered context of our so-called “Anthropocene Epoch” such services are not merely valuable but *essential*. This is a letter, not a monograph, but I would be glad to expand on this point if asked to do so.

01  
(Cont.)

I am an evolutionary ecologist, housed in a Department of Evolution and Ecology. The two should be joined at the proverbial hip. Existing ecological communities are freeze-frames from a very long movie. They have not existed for eternity, and many have existed only a few thousand years. There is nothing intrinsically sacred about interspecific associations. *Ecological change is the norm, not the exception*. Species and communities come and go. The ideology (or is it faith?) that informs “restoration ecology” basically seeks to deny evolution and prohibit change. But change will happen in any case, and it is foolish to squander scarce resources in pursuit of what are ideological, not scientific, goals with no practical benefit to anyone and only psychological “benefits” to their adherents.

If that were the only argument, perhaps it could be rebutted effectively. But the proposed wholesale habitat conversion advocated here does serious *harm*, both locally (in terms of community enjoyment of public resources) and globally (in terms of carbon balance—urban forests sequester lots of carbon; artificial grasslands do not). At both levels, wholesale tree removal, except for reasons of public safety, is sheer folly. Aging, decrepit, unstable Monterey Pines and Monterey Cypresses are unquestionably a potential hazard. Removing them for that reason is a very different matter from removing them to actualize someone’s dream of a pristine San Francisco (that probably never existed).

Sociologists and social psychologists talk about the “idealization of the underclass,” the “noble savage” concept, and other terms referring to the guilt-driven self-hatred that infects many members of society. Feeling the moral onus of consumption and

Shapiro-1

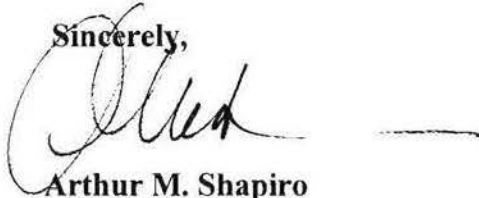
01  
(Cont.)

**luxury, people idolize that which they conceive as pure and untainted. That may be a helpful personal catharsis. It is not a basis for public policy.**

**Many years ago I co-hosted John Harper, a distinguished British plant ecologist, on his visit to Davis. We took him on a field trip up I-80. On the way up several students began apologizing for the extent to which the Valley and foothill landscapes were dominated by naturalized exotic weeds, mainly Mediterranean annual grasses. Finally Harper couldn't take it any more. "Why do you insist on treating this as a calamity, rather than a vast evolutionary opportunity?" he asked. Those of us who know the detailed history of vegetation for the past few million years—particularly since the end of Pleistocene glaciation—understand this. "Restoration ecology" is plowing the sea.**

**Get real.**

**Sincerely,**

A handwritten signature in black ink, appearing to read 'Arthur M. Shapiro', with a horizontal line extending to the right.

**Arthur M. Shapiro  
Distinguished Professor of Evolution and Ecology**

**(530)752-2176, fax 752-1449  
amshapiro@ucdavis.edu**

Sharp-1

**From:** [Bill Wycko](#)  
**To:** [Jessica Range](#)  
**Subject:** Fw: Dog parks  
**Date:** 10/03/2011 05:04 PM

---

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/03/2011 05:04 PM -----

**Alisa Sharp**  
**<alisa.sharp@gmail.com>**

To "bill.wycko@sfgov.org" <bill.wycko@sfgov.org>  
cc

10/03/2011 04:55 PM

Subject Dog parks

Dear Bill,

01

As a dog owner and frequent visitor of dog park areas I would like to request that you reconsider the closure of any such spaces. The dog park space my dog utilizes is an integral part of his socialization.

Thank you for your time.

Best,  
Alisa

Shepard-A-1

Jun 11 23 01:49p

Shepard

4157530325

p.1

**To:** Bill Wycko, Environmental Review Officer

**Date:** June 10, 2012

**From** Avrum Shepard

**Subject:** DEIR for the SNRAMP File No. 2005.0912E

Unfortunately, I faxed the wrong copy of my comments on the above subject. The following pages replace my original fax. Thanks.



Avrum Shepard

Shepard-A-1

Jun 11 23 01:49p

Shepard

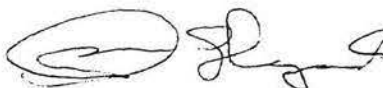
4157530325

p.2

**To:** Bill Wycko, Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street  
San Francisco, CA 94103-2479

**Date:** June 10, 2012

**From:** Avrum Shepard  
1037 Portola Drive  
San Francisco, CA 94127  
(415)661-9255



**Via fax (415)558-6409**

**Subject: Draft Environmental Impact Report for the Significant Natural Resources Area Management Plan (Planning Department File No. 2005.0912E)**

- 01 NAP is fundamentally flawed and misses the point entirely. It is not what San Francisco wants or needs. We want accessible, attractive, safe, and well maintained parks and recreation areas. We need more services that attract and keep families in our city. NAP not only does not provide these vitally needed resources, it sucks funding away from them. Some of the contradictions caused by NAP facing the families in our neighborhood are illustrated by recent activities by RPD.
- 02 All playground directors were fired leaving a gap in children's recreation in our city. RPD saw this as a money saving endeavor. We see it as a giving up of one of RPD's most basic functions. At the same time, RPD spends money on NAP, a program that serves very few people. Although the city department name begins with "recreation" they have apparently abandoned the requirement to provide that service.
- 02 NAP introduced this plan to remove trees, reduce trails and severely restrict access to recreation, repeatedly spray toxic herbicides in areas where children recreate, destroy existing habitat that supports animals which live in our parks, and violate state law governing the use of herbicides. And they spend money on cutting down healthy trees which provide habitat for many animals, instead of spending the money on maintaining trees in parks for citizen safety. For example, in 2003, a study was done to identify the health of the trees in Stern Grove. Many trees were identified as hazardous and in need of maintenance. RPD did not perform the prescribed maintenance on those trees, but did cut down non-native trees. In 2008 a woman was killed by a falling tree branch that had been identified in this study.
- 03 Bathrooms at playgrounds throughout the city are in pitiful condition. No human wants to go into these horrible pits, but RPD spends money on developing a NAP plan. NAP has been working on this plan for many years instead of providing the services that citizens want.
- And how is it that NAP is exempt from the standards established by Proposition C that apply to all other parks?

Shepard-A-1

Jun 11 23 01:50p

Shepard

4157530325

p.3

04

NAP has forged ahead with developing this plan and with few exceptions, excluded citizen involvement. None of the neighborhood organizations west of twin peaks have ever been asked to host a presentation by NAP of their plans, even though Mt Davidson is in our backyard. On the other hand, we were asked to host presentations of RPD bonds in 2008 and currently for the 2012 bond. So each time RPD needs money, they come to us asking for help. They do not involve us in planning for how to spend the money. Please reject the NAP plan and DEIR and demand that RPD be accountable to the citizens of our city and provide needed services.

03

(Cont.)

One more thing needs mention. The idea of a city department taking so long to come up with a plan for what it is to do is completely absurd. NAP has been a major section of RPD since 1997. How much money should we spend developing a plan that provides so little return? And how long can we afford to keep the section of a city department functioning without a plan?

04

(Cont.)

NAP did finally make a presentation on at the West of Twin Peaks Central Council in May, 2012 of the NAP plan, but only after repeated calls to RPD. After reading the plan and listening to the NAP presentation I voted to oppose the plan and ask for you to do the same.





Simons-1

**From:** Bill Wycko  
**To:** Jessica Range  
**Subject:** Fw: Dogs in the Parks  
**Date:** 10/04/2011 09:32 AM

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/04/2011 09:33 AM -----

**Kevin Simons**  
**<kevin\_simons@yahoo.com>**

To: "bill.wycko@sfgov.org" <bill.wycko@sfgov.org>  
 cc

10/04/2011 07:56 AM

Subject: Dogs in the Parks

Please respond to  
 Kevin Simons <kevin\_simons@yahoo.com>

Mr. Wycko,

Jennifer Scarlett, co-President of the San Francisco SPCA, stated my beliefs perfectly:

01

*It's so important that those of us who share this beautiful part of the world remember the word "share." Dogs and dog people are part of a community of extremely varied interests. For decades, San Francisco has worked to balance and blend those interests—not just informally but under the law. The city's Natural Resource Areas Management Plan could tip that balance away from the needs of the city's responsible guardians and their dogs and undermine their quality of life.*

*And, in a real way, others' quality of life as well. How? Urban recreation isn't just a private pursuit; it has civic value. In this case, by fostering everything from wider environmental awareness to physical fitness (who doesn't take obesity seriously these days?); by encouraging dogs to be less anxious and more trainable, to be people-friendly and sociable with their fellow dogs (leading to a safer city); by acknowledging the value of animal companionship; and, in the broadest sense, by sustaining a community that looks out for its animals, adopts them, and insists on humane conditions everywhere.*

Kevin Simons  
 5800 Third Street #1404  
 San Francisco, CA 94124  
 (415) 378-2347

Skippy-1

**From:** [Bill Wycko](#)  
**To:** [Jessica Range](#)  
**Subject:** Fw: Dogs in Parks  
**Date:** 10/03/2011 04:38 PM

---

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/03/2011 04:39 PM -----

**Skippy**  
**<skippyskippy@gmail.com>** To: bill.wycko@sfgov.org  
cc  
10/03/2011 03:29 PM Subject: Dogs in Parks

01 [ I am a dog owner and not only should we keep, but we should expand, our dog parks. Dr. Scarlett DMV in the SF Gate today said it best:

Urban recreation isn't just a private pursuit; it has civic value. In this case, by fostering everything from wider environmental awareness to physical fitness (who doesn't take obesity seriously these days?); by encouraging dogs to be less anxious and more trainable, to be people-friendly and sociable with their fellow dogs (leading to a safer city); by acknowledging the value of animal companionship; and, in the broadest sense, by sustaining a community that looks out for its animals, adopts them, and insists on humane conditions everywhere.

--

*Tell me, what else should I have done?  
Doesn't everything die at last, and too soon?  
Tell me, what is it you plan to do  
with your one wild and precious life?*  
~Mary Oliver, "The Summer Day"

Smith-1



**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 11:48 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: I disagree with closing any more land for native plants

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 11:49 AM -----



**Megan Smith**

**<megan@sierra.net>**

10/31/2011 10:02 AM

To <bill.wycko@sfgov.org>

cc <sfdog@yahoogroups.com>

Subject I disagree with closing any more land for native plants

Dear Mr. Wycko,

01

I appreciate the beauty of native plants and the history behind showing what vegetation grew before the city was here. Also, they make sense for saving water. But please do not close off any more land in San Francisco for this purpose – I think we have enough areas set aside already.

02

This latest plan would cut off traditional uses of parks and trails and we already have so few places to hike. The anti-dog bias seems based on people's opinions and dislike of dogs rather than facts or scientific studies. If you add this plan to the ridiculous and onerous GGNRA plan, dog owners will have no other option than to head to the nearest city parks – which already overcrowded for baseball and soccer games.

03

In my own small back yard, I grow native plants, never use pesticides or fertilizer, allow certain weeds to grow just because of butterflies, let bushes get overgrown for birds, try to grow sunflowers for bees etc. I would like to see more of this type of thing encouraged for the backyards of San Francisco, but I am very much opposed to closing areas where people now go with dogs or with their children (or both!) to devote to more native plant areas.

Thank you for your consideration.

Best regards,

Megan Smith

Little League/soccer mom and dog owner

Stafford-1

**Bock, John**

---

**From:** Jessica.Range@sfgov.org  
**Sent:** Tuesday, November 01, 2011 3:49 PM  
**To:** Bock, John  
**Subject:** Fw: 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](http://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 03:27 cc  
PM  
Subject  
Fw: NAP EIR

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 11/01/2011 03:28 PM -----

nancy stafford  
<nancyn42penguins  
@sbcglobal.net> To  
bill.wycko@sfgov.org  
10/31/2011 04:59 cc  
PM  
Subject  
NAP EIR

Stafford-1

To: Bill Wycko

Environmental Review Officer

I am very concerned about the NAPEIR and the lack of sound science behind it.

01

I support the Maintenance Alternative so more people will be able to use these areas for multiple recreational activities. To designate so much parkland for passive recreation when the population is growing makes no sense. The NAP is the largest user of herbicides and there is nothing "natural" about using so much poison to get rid of an existing ecosystem to replace it with a supposedly more natural one.

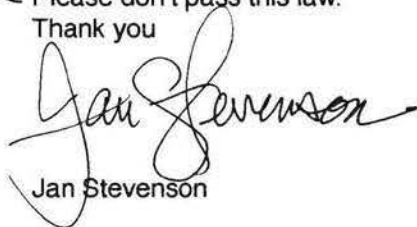
Nancy Stafford

Stevenson-1

Jan Stevenson  
1341 29th Ave.  
San Francisco, CA 94122

SF Park and Recreation Dept.  
c/p Park Natural Areas Program  
Bill Wycko  
Environmental Review Officer, Planning Department  
1650 Mission Street  
San Francisco, CA 94103

- 01 [ Mr. Wycko and Planning Department:  
I wish to submit my strong objection to the proposal to limit off lease areas in the San Francisco.  
Sometimes it seems to me that rules are created that have the direct opposite effect as are intended. I think every dog walker I have ever used was highly sensitive to the environment, using parks, cleaning up after animals, watching the areas for dangerous situations and generally taking care of the area they use on a regular basis.  
I can not tell you how many people I have known that have moved out of the San Francisco area because it felt unfriendly to them in their attempts to raise children.  
It begs the question of who do you want left in the city and who is going to use the city?  
Animals have been shown to reduce stress and calm heart rates for all ages. It feels like you are driving out animals and children in the city with all these rules.  
Please have more consideration for the benefits derived from people being able to keep and exercise animals.  
01 (cont.) [ This seems a little far fetched to me that animals could have such a negative effect on the environment as to want to ban their being able to run loose entirely.  
The worst fights I have witnessed were in enclosed dog parks like the one in Golden Gate Park. It makes big dogs predatory, small dogs fearful and owners with dogs that are problems tend to bring their dogs to enclosed areas.  
Please don't pass this law.  
Thank you

  
Jan Stevenson

Stewart-E-1

**Bill Wycko/CTYPLN/SFGOV**

06/04/2012 05:54 PM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: Mt. Davidson Natural Area Plan DEIR

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 06/04/2012 05:54 PM —

**ethan stewart**

&lt;stewartethan@hotmail.com&gt;

06/01/2012 09:55 PM

To &lt;bill.wycko@sfgov.org&gt;

cc

Subject Mt. Davidson Natural Area Plan DEIR

01

Hello, my name is Ethan Stewart. My family and I live on Stanford Heights Avenue in Miraloma, and I am writing about the proposed natural area plan for Mt. Davidson. I am opposed to the current plan of healthy tree removal in native plant restoration. The trees that exist there are already part of the urban environment. There is really no such thing as being able to return any area to a "native" habitat, especially when tree removal results in the potential for greater wind erosion, harsher treatment through pesticides to control non-native plants and animals and in fact greater destruction to the Mt. Davidson recreation area through greater potential for non-native species to crowd out any attempts at restoration. If hazardous or unhealthy trees need to be removed, they should be immediately replaced with Monterey Cypress and more amenities (benches, etc.) should be installed near native plant zones. As a frequent hiker to the area, the trees provide habitat for birds, butterflies and other species now living on Mt. Davidson, and should be protected. Additionally, as someone who is concerned about native environments and habitats along with quality of urban living, I am opposed to the plan simply because it seems misguided. Urban environments are by definition non-native and the most reasonable solution is to preserve what makes the area wonderful while doing whatever is possible to minimize damage elsewhere. Attempting to recreate something that may or may not have existed can very well lead to even greater problems. Please consider revising or rejecting the proposed draft for Mt. Davidson. Mahalo for your time and consideration. Ethan Stewart

Stewart-M-1

**From:** Bill Wycko  
**To:** Jessica Range  
**Subject:** Fw: Please don't take away our DPAs in Bernal Heights  
**Date:** 10/05/2011 05:35 PM

---

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/05/2011 05:35 PM -----

**Matt Stewart**  
**<mjfstewart@gmail.com>**

To bill.wycko@sfgov.org  
 cc

10/05/2011 05:28 PM

Subject Please don't take away our DPAs in Bernal Heights

Bill - I live at 171 Coleridge St in Bernal Heights. I'm lucky to have two amazing leash-free parks in Holly Park and Bernal Hill where my dog frolics every single day without hurting a blade of grass. Alas, I saw that a plan's coming up that threatens to undo that.

Please don't take away dog play space from me (and my dog, Otis!).

01 [ Actually, it'd be useful if you could first explain what the problem is re: Dog Play Areas...I've never heard of anybody saying anything but terrific things about them. Why are people chipping away at these? They're aware that we have more dogs than just about anything else in SF, right?

Every year people try to bend San Francisco into a place that's less special. Look at the crackdown on Bay to Breakers (no floats? really?) and the periodic attacks on leash-free dogs in the GGNRA. I love living in SF for many reasons, but a big one is that this city treats me like an adult. I keep my dog under strict voice control, and so do 99.999% of other dog owners. I have never seen a problem with an off-leash dog in a park - but I have seen an incalculable level of love.

01 (Cont.) [ Dog Play Areas make San Francisco an amazing place to live. Please, keep them all - or expand them. But don't turn this magnificent city into Brisbane by deleting them.

Thanks-  
 Matt Stewart  
 171 Coleridge St.

--

415.867.0999 :: <http://matt-stewart.com> :: <http://twitter.com/mjfstewart>



Strasbaugh-1

**From:** [Bill Wycko](#)  
**To:** [Jessica Range](#)  
**Subject:** Fw: AGAINST draft Significant Natural Resource Areas Management Plan  
**Date:** 10/04/2011 09:31 AM

---

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/04/2011 09:32 AM -----

**lalaweese@aol.com**

10/03/2011 07:24 PM

To: bill.wycko@sfgov.org, David.Campos@sfgov.org  
 cc  
 Subject: AGAINST draft Significant Natural Resource Areas Management Plan

Dear Mr. Wycko and Supervisor Campos

01 { I am a District 9 homeowner residing at 286 Hamilton St., San Francisco. I am also an 11 year dog volunteer with the San Francisco SPCA. I am outraged that you would consider the huge cuts you proposing for dog play areas in San Francisco. First of all, a reminder: a draft environmental-impact statement by the Golden Gate National Recreation Area has already shown no direct link between dog walking and any environmental damage in GGNRA lands. Second, what do you think is going to happen when you cut these DPAs? There will be more pressure on the surviving DPAs because more dogs will be visiting fewer areas. Is that your ultimate goal? To force dog owners and walkers out of parks altogether? Or, as you put it - is THIS the "environmentally superior alternative." ?

Dogs are NOT the enemy; they are members of people's families WHO LIVE HERE AND PAY TAXES. A well-played and exercised dog is a safer dog. They have learned social interaction with both dogs and people, which makes our city safer. Our shelter and the various dog rescue groups have a proud, ground-breaking tradition of supporting animal companionship and no-kill shelters. Dogs are a fact of life in this city, and this plan would threaten the well-being of everyone.

I take shelter dogs on hikes in McLaren, and citizens have already taken it upon themselves to put up poop bag containers, as they have in many other parks. McLaren is ideal for all kinds of dogs, be they ones that need to be away from other dogs, or dogs that enjoy dog play. And it is free - paid for by my taxes.

Strasbaugh-1

If people are so worried about poop, heck, let's just start shooting seagulls, or pigeons. And what about the trash in parks - should we not allow people in them?

If this plan moves forward, Supervisor Campos, I will be watching very closely to see how you respond. Meanwhile, shame on you Mr. Wycko.

Louise Strasbaugh

louise

Stringer-1



**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 04:20 PM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: DEIR SNRAMP comments

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 04:20 PM —



**Lewis Stringer**

**<lewisstringer@hotmail.com>**

10/31/2011 04:14 PM

To <bill.wycko@sfgov.org>

cc

Subject DEIR SNRAMP comments

Dear Mr. Wycko:

- 01 { I am writing to comment on the Draft Environmental Impact Report (DEIR) for the Significant Natural Resource Areas Management Plan (SNRAMP).
- 02 { I am citizen of San Francisco and a supporter of the Natural Areas Program and the goals in the Natural Areas Plan. I am concerned however that because of the ongoing legislation and litigation concerning Sharp Park that it should be separated out from the rest of the environmental analysis of the Natural Areas Plan.
- 03 { I am an ecologist working in similar environments and am concerned that the removal of eucalyptus groves in the MA-3 areas was not fully evaluated. The threat these trees pose in the long term to the goal of preserving biodiversity is significant and the Proposed plan is in my opinion inadequate at addressing them.
- 03 { The GGNRA, in their most recent Management Plan, includes community stewardship as a form of recreation in their analysis of alternatives. I encourage you to do the same. Such an evaluation may change the equation that evaluates impacts to recreation, and ultimately lead to a different conclusion of what is an environmentally superior alternative.

Sincerely,

Lew Stringer

425 Buena Vista Ave East

San Francisco, CA

94117

Summer-1



**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 04:16 PM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject: Fw: Comments regarding the NAP EIR

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 04:16 PM —



**william summer**

**<wm\_summer@yahoo.com>**

10/31/2011 02:19 PM

Please respond to  
william summer  
<wm\_summer@yahoo.com>

To: "bill.wycko@sfgov.org" <bill.wycko@sfgov.org>

cc

Subject: Comments regarding the NAP EIR

Mr. Wycko,

01

This email is in response to the NAP EIR, which is an inadequate plan that requires additional work. Buena Vista is my neighborhood park, which I have been walking in for the past 8 years with my dog. The NAP EIR will restrict my and my neighbor's access to this park, as well as a number of others.

02

It's important that the EIR be based on solid scientific evidence, which is not the case here. The NAP EIR asserts a number of times that dogs may be impacting plants or wildlife but does not offering any evidence, past or present, while ignoring scientific studies that show the contrary. Ignoring scientific studies that do not agree with the plan while not providing any evidence of its own is not acceptable.

The analysis of the effects of the proposed closures of up to 80% of the Dog Play Areas in the city is incomplete. The impacts on other DPAs, parks, and the impact of park users traveling to the remaining DPAs on the environment have not been considered.

Thank you for your time,

William Summer  
San Francisco home owner

Sutch-1



**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 04:08 PM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: Off leash areas for dogs in San Francisco

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 04:08 PM -----



**Jeff Sutch**

<jeff.sutch@gmail.com>

10/31/2011 04:00 PM

To bill.wycko@sfgov.org

cc

Subject Off leash areas for dogs in San Francisco

Hello,

01

I'm writing to ensure that off leash areas for dogs are included in the voices about how we should manage our natural resources in San Francisco. It should be clear that green areas are crucial to a sociable and healthy city. San Francisco benefits greatly from not only allowing it's citizens to be dog owners, but to increase the health of of pets and the owners. Many dog owners receive their exercise by walking around with dogs and many of our citizens who can't easily make it out of the house due to anxiety or other issues are coaxed from the house and encouraged to walk more and longer. This effect can't be duplicated by on-leash walks. Even breeds that are smaller and normally are considered lap dogs benefit from a long run and impart their health on their owners.

Well exercised dogs are happier, healthier and exhibit a positive impact on the people of a city and their social and mental health. By having legal places for dogs to run you encourage owners to be more proactive about registration and shots through the calming hand of social pressure. Making off-leash illegal or squeezing it into the shadows this will result in more people who are law-abiding citizens today becoming a concern for enforcement later.

Please keep our off-leash areas safe - they are in the city's best interests.

thanks,

-Jeff

Swenerton-1

**RECEIVED****OCT 28 2011**

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

To Whom It May Concern: **CITY & COUNTY OF S.F.**  
 PLANNING DEPARTMENT  
 M E A

I am writing to express my support for the Significant Natural Areas Management Plan and to comment on the Draft Environmental Impact Report for that plan.

01

The Significant Natural Areas Management Plan is a decade overdue and is based on painstaking research and innovative, cutting edge, sustainable land management practices. It represents a step in the right direction for the Recreation & Park Department, and indeed for the City as a whole. As a professional ecologist involved in urban restoration for the past 13 years, I can personally attest to the overflowing positive impact that the restoration activities this plan proposes can have on the quality of life and ecological integrity of our city. The SNRAMP is the most cost effective way for managing our precious and quickly disappearing natural gems and 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 SNRAMP is sound and reasonable. In fact, it is based on a decade worth of compromise that fairly takes into account and mitigates for potential impacts to our City's resources. In actuality, the habitat restoration element has been watered down to the point that the long-term sustainable management and control of invasive plants is barely achievable. Its proposed goals are modest, reasonable and balanced.

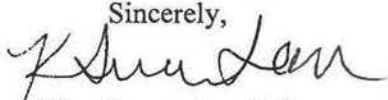
02

03

I believe that the SNRAP DEIR is an adequate, accurate and complete review of the plan is based on detailed, comprehensive research and sound scientific studies conducted by experts. My main criticism is the fact that the analysis does not value community stewardship and restoration activities in the Natural Areas as a positive impact on recreation. This omission misses the point that stewardship is a form of recreation and volunteers are park users who improve and value our natural resources. Secondly, it makes no logical sense that the recreation and maintenance alternatives are weighed as "environmentally superior" to habitat restoration of the adoption of the proposed project. The fundamental goals of the proposed project and restoration alternative are to benefit the environment. Environmental review is strangely skewed in this circumstance as it is primarily utilized for projects that intend to cause damage to the environment rather than those that seek to restore and improve it. Therefore, it should be understood that the gravity of the particular environmental impacts of the maximum restoration alternative are far lower and logically preferable to those of the maximum recreation alternative. Restoration and recreation are not mutually exclusive. Community based restoration is a valid and increasing form of recreation.

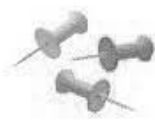
It is high time the city adopt the SNRAMP. I wholeheartedly support it.

Sincerely,



Kirra Swenerton, M.S.  
 101 Alpine Terrace  
 San Francisco, CA 94117

Thayer-1



**Bill Wycko/CTYPLN/SFGOV**

06/11/2012 12:45 PM

To Irene Nishimura/CTYPLN/SFGOV@SFGOV, Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: Mount Sutro development

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 06/11/2012 12:45 PM —



**Nick Thayer**

**<nickstron22@gmail.com>**

06/08/2012 01:18 PM

To "bill.wycko@sfgov.org" <bill.wycko@sfgov.org>

cc

Subject Mount Sutro development

01

Please don't develop Mount Sutro any further. The area needs to maintain its serenity in order to remain a nice destination for people from all around the Bay Area, both for hiking and otherwise.

Thank you for your time and for keeping Mount Sutro one of the few natural areas left in the city.

Nick Thayer

Thomas-1

**Bill Wycko/CTYPLN/SFGOV**

06/11/2012 03:41 PM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: Natural Areas Plan DEIR for Mt. Davidson

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 06/11/2012 03:41 PM —

**Barbara Thomas**  
<miatanyabeta@sbcglobal.net>

06/11/2012 03:34 PM

To Bill Wycko &lt;bill.wycko@sfgov.org&gt;

cc Marieka Thomas &lt;marieka\_t@yahoo.com&gt;

Subject Natural Areas Plan DEIR for Mt. Davidson

Thank you for our telephone conversation this afternoon regarding potential negative impacts on Mt. Davidson of implementation of the Natural Areas Program of the S. F. Recreation and Parks Department. As a resident of Miraloma Park for over 40 years, I have become a keen observer of the natural habitat here. Testimony to the health of the mountain ecosystem is the thriving of our highest predators in the food chain, red-tailed hawks and peregrine falcons, which control our rat and squirrel population. We have a natural environment which has evolved over more than 100 years. Nature has done a good job, better than humans can!

If our wild animals' habitat is disrupted, they will be flushed out of their homes and into abutting housing, potentially becoming not only pests but also disease vectors and a danger to humans and domestic pets. There is a huge population of dog owners in this neighborhood who daily take their pets outside, and a few "free range" pet cats.

01

I am vehemently opposed to poisoning of the ground to protect newly reintroduced "native species", since the toxins enter animals' food chain and work their way up through many species to top predators. The mountain supports both local birds and flocks of migratory bird species, so the effects of poisoning transcend our city/county boundaries. Also, children and domestic pets can be poisoned. Many dog walkers regularly use this park and need full, safe access.

02

03

04

05

06

Although there is Franciscan formation bedrock on Mt. Davidson, it is overlaid with many feet of topsoil which is held by eucalyptus tree root systems. Removing wide swaths of these trees could destroy that stability and cause landslides, imperiling houses downhill. Existing underground springs could also be disrupted or re-routed. Wind tunnels would be created by tree removal and pleasant micro-climates would be altered. Poisoned ground water could enter our storm drains and S. F. Bay. Loss of trees would result in less sequestering of carbon dioxide and motor vehicle exhaust products, adversely affecting local air quality. Please help us block this insane program! Sincerely, Barbara Thomas





Thompson-C-1

**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 09:07 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:08 AM -----

**"Clare M. Thompson"**

&lt;cleoleo@sonic.net&gt;

10/31/2011 08:49 AM

To bill.wycko@sfgov.org

cc SupervisorScottWiener@sfgov.org

Subject

01

Dear Bill Wycko, This is a response from a Glen Canyon Park supporter who has lived in Glen Park for over 26 years and has enjoyed and loved daily walks through Glen Canyon Park. Please, please, please, stop the misguided people who claim to have and share the best interests of most of us who love this park. The park first and foremost belongs to ALL of us; it exists for us all. It is a NATURAL HABITAT and as such should be protected from ruin by the above over earnest small group of very vocal people who want to turn it into another botanical garden. We already have a S.F. Botanical Garden where people can enjoy all kinds of flora( including a large area of native plants of the Bay Area).

Glen Canyon is a home to birds of many kinds. It provides a safe haven to migratory birds. Habitats of this nature are becoming fewer and fewer. We need to be extremely careful that we not be persuaded to citify, if you will, and thus ruin this natural area. Many of us who walk through Glen Canyon on a daily basis have noticed that the willow trees that shelter numerous birds (red tail hawks, owls, and many other creatures) have been unnecessarily cut back severely and almost on a weekly basis. In no time, ALL of us who love this natural habitat will find very little vegetation and beauty to enjoy, relax in, and be inspired by. This is not restoration; it's more like mutilation or destruction. This is self-serving; this is NOT for the common good.

Thompson-D-1

**From:** [Bill Wycko](#)  
**To:** [Jessica Range](#)  
**Subject:** Fw: Dogs: we live in THE CITY. Should we get rid of the buildings too?  
**Date:** 10/05/2011 05:00 PM

---

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/05/2011 05:00 PM -----

**Doug Thompson**  
<dougthompson67@yahoo.com>

To "bill.wycko@sfgov.org"  
<bill.wycko@sfgov.org>

10/05/2011 04:55 PM

cc

Please respond to  
Doug Thompson <dougthompson67@yahoo.com>

Subject Dogs: we live in THE CITY. Should we get  
rid of the buildings too?

Dear Sir,

01

This restoration movement doesn't make sense. We live in THE CITY. Should we get rid of the buildings too? Should we return Golden Gate Park to sand dunes? California has a LOT of nature. It just doesn't happen to be in the CITIES, because they are CITIES.

Thank you for listening.  
Doug Thompson

Tondelli-1

**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 09:08 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: SF City Parks Plan

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:09 AM -----

**TopDog**

&lt;info@topdogsf.com&gt;

10/31/2011 08:42 AM

To bill.wycko@sfgov.org

cc

Subject SF City Parks Plan

Dear Bill Wycko,

I am writing to you as a concerned professional dog walker and resident of San Francisco. I strongly feel that the new proposed legislation restricting professional dog walkers to a maximum of seven dogs is simply disadvantageous for dogs, responsible dog owners, professional dog walkers, and the city of San Francisco. Dog walkers provide an invaluable service that many dog owners rely on to keep their dog well exercised, sociable and mannered. Furthermore, professional dog walkers help keep parks and recreation areas clean and maintained.

I am not in opposition of regulating professional dog walking; in fact I support it as the industry is growing and regulation is long overdue. However limited the number of dogs to seven simply is not financially sustainable for myself and other professionals in this industry. The loss in income from losing one full time client is approximately \$6,500 per year, which is a significant portion of my income. I feel that I speak for all dog walkers in the city of San Francisco when I say that there is nothing I would love more than to continue providing this necessary service in a professional manner, however this proposed legislation is something that I may not be able to overcome financially.

I believe the most beneficial course of action is to follow the recommendation of the Commission of Animal Control and Welfare of San Francisco. The ACC proposes that professional dog walkers should be limited to **eight** dogs and adhere to strict, professional business practices including a thorough permit process, education and accountability. Eight dogs is a very reasonable limit that a professional dog walker can certain handle with professionalism and attentive care, and also is more financially sustainable.

Please consider revising the proposed legislation to concede with the eight dog limit recommendation from the San Francisco ACC. I truly feel that this is the most beneficial to all parties who participate in dog walking services, including other park users.

Tondelli-1

Sincerely,

Natalie Tondelli, CTC  
SPCA Certified Trainer and Counselor

Top Dog SF  
3150 Rivera Street  
San Francisco, CA 94116  
415 225-3081  
[www.topdogsf.com](http://www.topdogsf.com)

Tully-1

Sean Tully  
10 Golf Ave.  
San Rafael, CA  
stully@meadowclub.com

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

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:

Tully-1

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

Tully-1

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 5<sup>th</sup> hole, which is now the 17<sup>th</sup> 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.

01

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

Valente-1

## COMMENT ON THE EIR FOR THE NATURAL AREAS PROGRAM

### 1.0 INTRODUCTION

The Natural Areas Program ("NAP") has proposed alterations of the San Francisco Parks system that are not in the best interest of the residents of San Francisco, and in doing so violate the public confidence. The Mission Statement for SFRPD reads:

*"The San Francisco Recreation and Park Department's Mission is to provide enriching recreational activities, maintain beautiful parks and preserve the environment for the well-being of our diverse community."*

In an attempt to bring the NAP into compliance with this Mission Statement, Lisa Wayne, Natural Areas Program Director, described the intent of NAP as being, *"Preserve what is left of the original habitat and protect it from further degradation...enhance these little remnants that are degraded"*.

In reality, a review of this EIR reveals NAP to be a wholesale takeover of at least one third of San Francisco parklands in a manner that violates current law, violates the social conscience of San Franciscans, violates scientific principles and deprives San Francisco families of the recreational opportunities they require for health and happiness.

01

This violation of the public confidence is highlighted in the EIR itself. On page 2, the EIR misleads the public by asserting the "Maximum Restoration Alternative" is the "Environmentally Superior Alternative." THIS IS WRONG. When this error was brought to the attention of the SFRPD, they refused to publish a retraction or correction until AFTER the public comment period was over. In reality, the "Maximum Recreation" and "Maintenance Alternative" are the environmentally superior alternatives because they have fewer unmitigated significant impacts than either the proposed project or the Maximum Restoration Alternative.

### 2.0 NAP VIOLATES CURRENT SAN FRANCISCO LAW

"In June 2003, the Board of Supervisors of the City and County of San Francisco became the first government body in the United States to make the Precautionary Principle the basis for all its environmental policy". It is Chapter 1 of SF's Environment Code.

*"When an activity raises threats of harm to human health or the environment, precautionary measures should be taken even if some cause and effect relationships are not fully established scientifically. In this context the proponent of an activity, rather than the public, should bear the burden of proof. The process of applying the Precautionary Principle must be open, informed and democratic and must include potentially affected parties. It must also involve an examination of the full range of alternatives, including no action." —1998 Wingspread Statement on the Precautionary Principle*

NAP is a wholesale abandonment of this promise.

02

### 2.1 NAP ENDANGERS THE PUBLIC SAFETY BY EXPOSING US TO VECTOR BORNE DISEASES AND PESTICIDES



Valente-1

02  
(Cont.)

Habitat restorations diminish public safety by encouraging the proliferation of mosquitoes and ticks, along with the diseases they carry which affect people, dogs and horses.

NAP advocates the construction of water features which become mosquito breeding grounds in San Francisco and Pacifica recreational areas. The artificial habitats created and supported by NAP have resulted in the propagation of stagnant pools of water, standing water in the stumps of trees that have been cut down, abandoned tires, and brush piles. These sites are all ideal breeding grounds for disease-borne mosquitoes. Evidence of such can be seen at such sites as Glen Park (near the children's day care facility). NAP merely states: *Staff should be provided education regarding the most effective way to avoid contracting WNV, which is to not get bitten by mosquitoes. Clothing such as long pants, long-sleeved shirts, and application of a mosquito repellent may all be helpful in this regard.* What about the public?

The outbreaks of West Nile encephalitis in the U.S. highlight the potential threat of viruses spread by mosquitoes, ticks, and certain other insects, and the need for assays to screen, diagnose and differentiate them from each other. In the U.S., public health officials first recognized West Nile virus (WNV) in 1999, and the disease has since become established in this country. Outbreaks of WNV infections have occurred for 12 consecutive years, infecting two to four million people, causing illness in tens of thousands of people, including more than 13,000 cases of neurological disease, and over 1,150 deaths between 1999 and 2009.

In 2002 WNV was identified as a threat to the blood supply. The potential for human-to-human transmission of WNV through organ transplants and blood transfusion raised concerns among public health officials about the safety of the blood supply. In response, FDA collaborated with industry and blood collection facilities to develop new donor screening tests. In the summer of 2003, the FDA approved these tests for use by scientists studying this problem, and blood testing laboratories began using them to screen the blood supply for this virus.

Of special concern is the fact that these viruses can cause asymptomatic infection during which the virus circulates in the blood. Individuals with such "silent" infections pose a threat of transmission through blood donation because they are not identified as being infected.

02  
(Cont.)

The environmental features the CDC instructs you to remove to protect you, your family and your community from ticks are precisely the environmental features NAP is implementing.

The CDC recommends landscaping techniques to create a tick-safe zone around homes, parks, and recreational areas:

- Removal leaf litter, brush piles and woodpiles.
- Clear tall grasses and brush.
- Place wood chips or gravel between lawns and wooded areas to restrict migration to recreational areas.

Plans for "habitat restorations" already implemented and proposed for Sharp Park confirm the objective of enhancing habitat for small mammals and creating "wildlife corridors" which bring these mammals into close proximity to residential neighborhoods. Excerpts from San Francisco's "Natural Areas Program" (NAP) state: "Issue: Important elements within natural habitats for the survival of small mammals as well as reptiles and amphibians include underbrush, fallen logs...debris such as lumber, brush piles...piles of abandoned lumber may be aesthetically unpleasing but provide important refuge habitat for many species..."

Valente-1

02  
(Cont.)

Recommendation: The natural or biodegradable (branches trees and logs) elements shall be preserved during vegetation management activities or replaced with brush piles.” (note-the phrase “vegetation management activities” refers in part to their plan to cut down 15,000 eucalyptus trees merely because they are non-native. They don’t intend to remove the resultant lumber or leaf litter, and the remaining stumps will become mosquito-breeding sites as well).

The Bio-Integral Resource Center is a non-profit organization here in the Bay Area dedicated to “Integrated Pest Management” as a means to suppress the pest population below the level that causes economic, aesthetic or medical injury. Their international network of advisors design strategies that minimize effect to human health and the environment. They state: *“To stop vectorborne diseases, we should apply our knowledge of pest biology and ecology. We should manipulate ecological factors to discourage transmission. What we should not do is indiscriminately apply massive amounts of insecticides through aerial spraying. Such an act of desperation will not provide a long-term solution, will kill important beneficial insects, and needlessly expose the population to toxic agents”*.

03

## **2.2 NAP EXPOSES THE PUBLIC TO EXCESSIVE USE OF DANGEROUS HERBICIDES**

We are finding out that poisons – poisons more potent than ever before – are now being used in city parks, because most city parks have a portion of them characterized as a “natural area”. The reason poisons are being used in our natural areas is to sustain artificially created landscapes as they might have appeared in the year 1776 – “museums” of fragile native plants. We are finding that these are not sustainable on their own, due to changed (and changing) ecological conditions. Without artificial management, which includes poisons, they become failures – as can be seen by the growing failure of the roof garden at the Academy of Sciences, where nonnative plants now outnumber the replanted “native” species in two of the four roof quadrants. These museums do not belong in our recreational areas where we spend time with our children and pets.

03  
(Cont.)

The San Francisco Department of the Environment issued NAP a variance to allow the spraying of Garlon Ultra 4, a poison that had not been permitted for use in parks in San Francisco except under extreme and limited circumstances, and then only by dabbing. The variance now allows the spraying of this chemical.

Glen Canyon Park is a case in point. Notices were posted of impending spraying of Garlon 4 Ultra. This park has a constant stream of walkers – adults, children and dogs. A preschool and a summer camp use the park. And there is a natural creek and resident wildlife. Not only is this dangerous to utilize these types of chemicals around the public, posted notices that NAP is applying pesticides or herbicides are frequently missing the required date and time of application. People seeing the notice don’t know whether the poisons were used and whether it’s safe to re-enter. This is a clear violation of the SF Department of the Environment’s rules regarding the use of herbicides.

Roundup is another of the poisonous pesticides currently used in our parks and being considered as a substitute for the Garlon Ultra 4. The use of Garlon and Roundup by NAP is increasing. In 2009, NAP applied Roundup (or Aquamaster, or glyphosate) only 7 times. One year later, in 2010, they applied it 42 times. In 2009, NAP applied Garlon 16 times. In 2010, NAP applied Garlon 36 times.

NAP has also applied pesticides that the Dept. of the Environment has not approved. For example, NAP applied Imazapyr at Pine Lake in 2009; it was not approved for use by the Dept. of the Environment until 2011. NAP has applied pesticides incorrectly. In November 2010, NAP posted that they were spraying Aquamaster near the shoreline of Lake Merced to kill ludwigia, an aquatic weed. However, Lake Merced is red-legged frog habitat, and Aquamaster is not supposed to be used within

Valente-1

03  
(Cont.)

60 feet of water bodies in red-legged frog habitat. NAP staff have been observed spraying Garlon without a respirator, as required by the Dept. of Environment.

Garlon Ultra 4 and Roundup are not meant to be used in recreational areas. *Scientific American* published an article addressing the toxic nature of Roundup's formula in "Weed-Whacking Herbicide Proves Deadly to Human Cells". Most cancers have a cumulative variety of causes. The incidence of cancer cases is growing in dogs, and pesticides are included as one of the culprits ([www.health-report.co.uk/cancer-pesticides-245T-24D.html](http://www.health-report.co.uk/cancer-pesticides-245T-24D.html)). Indeed, Garlon may be more toxic for dogs than people because dogs' kidneys cannot excrete the chemicals of which it is composed. Will the Garlon have a similar negative effect on coyotes who call Glen Canyon and other natural areas home? No one really knows the impact of the herbicides on the wildlife (raccoons, coyotes, possums, etc.) that are currently living in the natural areas, so collateral damage to the environment and its long term effects are as yet unknown. NAP's use of chemical substances is a clear violation of the Precautionary Principle.

04

### **2.3 NAP REFUSES TO PRITOTIZE LEGITIMATE SAFETY ISSUES OVER HABITAT CREATION**

NAP proposals for Lake Merced and Sharp Park make no mention of the need for toxic lead waste cleanup as part of any rehabilitation of these parks. In both cases, there is toxic lead in the soil in old rifle range areas that currently endangers wildlife and water quality. At Sharp Park, SFRPD has been promising cleanup since 1994, often citing the expense as a factor preventing completion of this task. How is it SFRPD justifies spending millions of dollars "reinventing" our parks to suit the desires of a few native plant enthusiasts, while toxic waste is allowed to persist in damaging our environment?

05

The NAP proposal acknowledges that erosion in the park properties endangers the public safety. Yet, repeatedly, the NAP plans to remove non-native plants and trees that are proven superior to resist erosion and replace them with native plants. Native plants are inferior in resisting erosion. NAP planners are not deterred.

Even worse, in Sharp Park, SFRPD intends to create a "Natural Area" in over 200 of the 400 acres there. Despite acknowledgement that there is a serious erosion problem within this park, the NAP states specifically it does not intend to address the erosion unless "capital funds are made available". SFRPD intends to utilize capital funds to remove over 200 acres of healthy, non-native plants, remove 15,000 trees in Sharp Park and plant native plants throughout those 200 plus acres. However, SFRPD has no capital funds allocated to resolve a serious erosion problem which poses a significant public safety risk!

06

### **3.0 NAP DOES NOT MEET SCIENTIFIC SCRUTINY**

There has been some dispute over the scientific basis for the Natural Areas Plan. While it is true that a Scientific Advisory Board was created, we have the testimony of Professor Edward F. Connor, Professor of Ecology at San Francisco State, before a Board of Supervisors committee last summer. He stated that while he was listed as a member of the Advisory Board, he had never seen The Plan, never been asked to comment on The Plan, and was actually denied a copied of The Plan when he requested one.

Professor Connor stated: "Imagine how much more I was surprised when I finally did obtain access to and read this report to find that the names of scientists on the Scientific Advisory Board, and the

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names of scientists who were invited to but never participated in the Advisory Board were all invoked to sanctify a report to which they had no contribution."

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(Cont.)

In regard to the Management Plan itself, Professor Connor stated: "I have read this plan and it is without scientific basis, it does not articulate clear, achievable, nor appropriate conservation goals for a set of small urban parks, it is void of an examination of the cost, feasibility, or utility of the management actions recommended, and it is without any sense that our urban parks must satisfy the needs for a wide variety of uses. I acknowledge that conservation numbers among the uses to which I would like to see our parks put, but not necessarily at the expense of other uses that are appropriate for urban parks and inappropriate in wild lands."

Arthur M. Shapiro (Professor of Evolution and Ecology at UC Davis) states the following. It cannot be allowed to trump the clear preferences of the vast : "The Natural Areas Program has its place, and it needs to be kept in that place majority of parkland users in San Francisco. The hatred of "exotic" trees, some of which are California natives anyway, is not only ideological but sometimes verges on the pathological, and has strong overtones of xenophobia and racism (look at the anti-"exotic" rhetoric yourself!). He also notes, "... 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." (S.D. Graves and A.M. Shapiro, "Exotics as host plants of the California butterfly fauna," *Biological Conservation*, 110 (2003), pp. 413-433) A classic example of this is the migrating Monarch butterflies who overwinter in eucalyptus trees in several locations on the coast of California.

Ecologist James H. Brown provides us with useful advice: "*It has become imperative that [as] ecologists, evolutionary biologists, and biogeographers ... we use our expertise as scientists not for the futile effort to hold back the clock and preserve some romantic idealised version of a pristine natural world, but for a rational attempt to understand the disturbed ecosystems that we have created and to manage them to support both humans and wildlife*".

An official in the State Forestry Department was shocked to learn of the areas NAP had designated for their use. NAP fails to identify park areas which are underutilized and/or undeveloped to become Natural Areas. The decision instead to create natural areas in the portions of the parks already vegetated and utilized very heavily for recreation is not reflective of good land use management practices and not mindful of the responsibility the Department has to provide recreation and enjoyment of the parks for the majority of the population.

07

#### **4.0 NAP DIMINISHES NECESSARY ACCESS TO PARKS FOR RECREATIONAL OPPORTUNITY SO IMPORTANT FOR OUR FAMILIES**

This City has already forfeited a significant amount of recreational parkland to the GGNRA. Much of this land has been converted from its originally intended recreational purpose to off-limits habitats. Now we are looking at losing an additional one third of our SFRPD parks to natural areas. In this densely populated metropolis, where are we supposed to go for recreation? As the old Cat Stevens ballad asks, "Where will the children play?"



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(Cont.)

We can utilize off-leash recreation as an example of the loss of legitimate recreational use. Currently, there are as many or more dogs in the City of San Francisco as there are children. Additionally, the City of San Francisco enacted a law in 2005 that **requires** dog guardians to provide their dogs with adequate exercise. The ordinance states: “**Adequate exercise** means the opportunity for the animal to move sufficiently to maintain normal muscle tone and mass for the age, size and condition of the animal.” Clearly for many of the medium to large size breeds, this can only be accomplished by off-leash recreation. Even a simple game of “fetch”, the most basic of activities humans engage in with their dogs, cannot be played unless the dog is off-leash. Yellow Labrador retrievers are a very popular breed of dog in the City, yet they are genetically predisposed to being overweight. These dogs require a good deal of off-leash running exercise as well as some swimming in order to maintain an acceptable, healthy weight. Furthermore, there are some breeds of dogs which require swimming as a primary form of exercise. If they are exercised primarily on grass, pavement or the ground, they develop arthritis at an extremely young age. One example of this would be the Newfoundland—a dog bred primarily for water rescue. This NAP program not only reduces the available area for off-leash recreation at a time when the number of dogs is ever-increasing, it also eliminates all areas where dogs are legally allowed to swim. One of the Commissioners pointed this out to Lisa Wayne at a meeting, and asked if NAP had considered alternative areas for swimming since they planned to eliminate the current areas, and she merely replied, “No”. This is not indicative of an attitude which seeks to fulfill the legitimate recreational needs of perhaps the largest “special interest” recreational group in the City—dog guardians. This attitude puts guardians at substantial risk of violating their legal duties and is unconscionable. This NAP cannot be approved without modifications which would increase the available area for off-leash recreation beyond what it is now, as well as designate specified areas for dogs to swim. Anything less would subject the City of San Francisco to litigation; the City has enacted an ordinance placing requirements upon dog guardians, acknowledged in same ordinance it is expected public property will be utilized to fulfill these requirements, and subsequently systematically removed the ability to fulfill these requirements by eliminating access to public property for that use. These actions are clearly discriminatory, and will serve to inflame the dog guardian community. Litigation over this issue would be inevitable and costly. Monies would be better spent fulfilling the City’s obvious responsibilities to the recreational needs of the public in order to avoid litigation entirely.

NAP plans call for the immediate closure of about 15% of the legal off-leash space (Dog Play Areas, or DPAs) in San Francisco city parks – the complete closure of the DPA at Lake Merced and reductions in the DPAs at McLaren Park and Bernal Hill. NAP says that dogs “may” impact the plants in natural areas, and therefore the closures are needed. The NAP refers to dogs as “nuisances”. NAP offers no proof, however, that any impacts actually occur or ever have occurred. Hard, scientifically rigorous proof must be provided if NAP is to kick people out of areas they have enjoyed for years. The way it’s set up now, NAP can take areas that have been legally off-leash for decades and, with the stroke of a NAP staffer’s pen (and no real proof), the off-leash is gone. **NAP could close up to 80% of the legal off-leash space in SF city parks**

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In this regard, mention must be made of the incredibly ill-advised idea to convert Sharp Park Golf Course into an additional natural area, a habitat for the red-legged frog. The Sharp Park Golf Course is currently generating net income for the City, and provides a valuable recreational resource for a diverse community with respect to age, race, and affluence. To destroy such a valuable recreational resource for a ridiculous notion that red-legged frog habitat could be an ecotourism draw is patently absurd. Let us remind you that the terms “recreation” and “park” are a part of the department name for good reason; recreation is an activity the staff is paid to foster, and that happens in parks, not in habitat.

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## **5.0 NAP DOES NOT REFLECT THE SOCIAL CONSCIENCE OF SAN FRANCISCANS**

Imagine a society with closed borders. Where only those native to that society are allowed to exist. Should you be foreign to that society, or non native, you will be persecuted. You will not be allowed to enjoy the simple entitlements of that society, i.e., liberty and the pursuit of happiness. In this case, however, you will not only be denied the ability to prosper in the foreign land, but you will also be deprived the most precious and fundamental of rights endowed upon all living things by their creator – the right to life. You will not be sent back to your homeland with a mere admonishment. Instead, you will pay the ultimate price. You will be exterminated. Your executioner will be the very society that had welcomed you with open arms a short time ago.

Am I describing an immigration policy gone amok? Is this where our current policies and practices are leading us with respect to our friends south of the border? Perhaps. But in actuality, what I am describing is the Natural Areas Program as perpetrated by the San Francisco Recreation and Parks Department, the Golden Gate National Recreation Area, the Center for Biological Diversity, the Sierra Club, the Yerba Buena Native Plant Society and the Audubon Society. These groups are advocating the violent destruction of trees, plants, flower and fauna that are non native to the San Francisco area. This is what the Natural Areas Program is all about – i.e., biological racism, or nativism, at its worst. Is this the incarnate of Nazi Germany right here in San Francisco in the form of death camps for Eucalyptus, Cypress, pond turtles, etc., simply because they are non native? Consider the hypocrisy of the aforementioned groups the next time you hear their members ranting and raving about the nativism/racism exhibited by our proposed restrictive border policies, and their insistence that San Francisco be a sanctuary city. For these individuals, the borders extend no further than their own backyards.

Those advocating natural areas would have you believe the opposition to them is made up of extremists. They attempt to marginalize opposition as dog lovers or tree huggers. Let's talk about the dog lovers. Dog owners comprise 30% of the households in this community. That's a big voting block in anyone's book.

Think about how to assess how people feel about their trees. There is the obvious - the countless projects implemented as we grew up to "plant a tree" here in our urban community as an approach to improving air quality. We all know trees support the existence of many animal species. But what of their spiritual contribution to our daily lives? I did a search on the Web. I found thousands of poems, extolling the virtues of trees. I couldn't find one poem about lessingia.

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The NAP plans to destroy 18,400 mature (defined as over 15 feet tall) trees and untold numbers of seedlings and saplings merely because they are non-native. There can be no legitimate dispute that this does not reflect the desires of the population at large. The overwhelming majority of the public loves trees, and does not care about their origin.

We appreciate the fact that mature trees improve the air quality in our urban environment and improve the beauty of the City. Thus, on one hand, we have the Mayor's program to plant more trees in the City, and on the other hand, we have NAP removing them. This is tantamount to digging a hole and then filling it up. We would point out the trees to be planted under the Mayor's program are *non-native*.

Additionally, there is the matter of NAP proponents historically girdling healthy trees, and City NAP gardeners not routinely removing damaging ivy growing up non-native trees or providing routine care, so that they decline in health. Thereafter, NAP insists these trees be removed as they are dead or

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dying. Such action is akin to denying routine medical care to children, and watching them die. At best, such conduct is reckless, but with NAP it is intentional and malicious. The planned tree removal is so extreme at Sharp Park that it violates anti-logging ordinances in the City of Pacifica. An extreme agenda such as this has no business commandeering one third of public park property as this NAP proposes to do.

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In many cases NAP declares all or portions of city parks directly adjacent to residential neighborhoods as "natural areas." Often no plants, birds or animals in the park are listed as endangered or threatened by the State or Federal government. Nor are there any "sensitive" species here as designated elsewhere in the NAP proposal by local native plant and bird enthusiasts. Yet, there is as part of the plan an objective to reduce "predation pressures". This would refer to the killing of feral cats and any other wildlife NAP deems unacceptable. Considering the proximity of this park to residential development, the trapping of cats and other wildlife on this park property could result in the destruction of pets. NAP proposes to kill bullfrogs and non-native turtles because they are believed to be competitors to native animals. This certainly offends the sensibilities of San Franciscans and our long history of devotion to animals in general and our pets in particular.

## 6.0 NAP SIPHONS FUNDS FROM LEGITIMATE PARK PURPOSES

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NAP is exorbitantly expensive. At a time when SFRPD is not fulfilling its mandate to repair, maintain and improve existing park facilities, it is poor planning to incur even greater financial responsibility by undertaking the creation of Natural Areas within the parks. These areas are expensive to create and their maintenance is labor intensive and thus expensive to maintain. When children still are forced to play on fields so riddled with gopher holes that they risk serious injury, play in recreational centers that are severely in need of repair, and utilize bathrooms that are so unclean they present a health hazard, serious discussion of this NAP becomes ludicrous.

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The SFRPD has failed to even complete the audits that were mandated by the Proposition C that provided SFRPD money to be used for recreational interests. The excuse given was that SFRPD ran out of money. Yet funds have been created to continue the planning of the NAP, and to produce this current plan document. It is rather transparent that funds have been arbitrarily and poorly allocated within the SFRPD, and *now* is the time for the S.F. Recreation and Park Commissioners to step in and put a stop to this type of irresponsible behavior. The two largest "special interest" recreational groups in the City -- parents and dog guardians -- are currently poorly served by SFRPD; the NAP proposal is one glaring example of this fact. The very small segment of the population who are native plant advocates and avid bird enthusiasts are the few people who are pleased with NAP and whose interests are being served by NAP. The needs and desires of the masses must override the preference of the few, because the masses are for the most part footing the bill. There must be accountability when you take tax monies given to you by citizens in good faith. The NAP was never spelled out to the voters in Propositions they voted on; the citizens were not told they would be sacrificing recreational properties to create "Natural Areas". This plan would never have been funded and approved by the voters if it were explained in detail at the time the voting took place. At best, the NAP should devote 5% of the park properties to Natural Areas; a figure proportionate to the population these areas bring pleasure to. That limited development should be put on hold until SFRPD can put its house in order; they must complete their audits, and set and reach standards for all existing park facilities before NAP is even brought up again for implementation in no more than 5% of the SFRPD's undeveloped or underdeveloped park properties.

Stop to compare the condition of neighborhood parks before NAP to the condition of those parks today. Stern Grove, for example, showcased beautifully manicured lawns and putting greens. Today,

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you will find dead grass and weeds in their place. The substantial cut in gardening resources gives one a clue as to how this could have happened. In fact, many of the facilities in our neighborhood parks have been neglected over the years – the victims of numerous budget cuts. How can we even consider pouring millions of dollars into NAP when there are so many pressing needs? The once coined “greatest park system in the world” is in danger of becoming a distant memory.

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## **7.0 NAP DESTROYS PARK PROPERTY AND IS UNSUSTAINABLE**

Is NAP sustainable as proposed? The answer can be found in another project with a significant native plant component and similar concerns, which was created 70 years ago and manned by experts whose credentials would be unlikely to be questioned by anyone. We should look to the UC Davis Arboretum.

The Arboretum is self-described as a “living museum”, an outdoor classroom, a HUGE garden encompassing 100 acres isolated at the edge of campus. A 10 year Wildlife Management and Enhancement Plan was recently completed, and the following is clear: even after 70 years, this is still necessarily a HIGHLY MANAGED ECOSYSTEM.

There are no plans to expand the Arboretum. The challenge is to preserve the Arboretum and reduce damage to the project as it is. Wildlife carries diseases that present a public safety risk. Protected species of wildlife have settled at the Arboretum and are killing certain important plant displays. The public does not condone the killing of wildlife that jeopardizes the health of the Arboretum. The concerns are many despite the wealth of expertise UC Davis has to manage this property.

NAP intends to destroy current flora and fauna on 1100 acres, not a mere 100 acres. NAP subsequently must revegetate these areas with native plants, and supervise them until they have matured. Beyond that, those proposing this NAP have failed to advise you that these properties will require intense management in perpetuity.

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NAP as proposed and as it is currently implemented is a miserable failure. The NAP Management Plan states that trees (at least those taller than 15 feet) removed will be replaced on a nearly one-to-one basis, although it acknowledges that the replacements may not be planted in the same area, or even in the same park. However, there are reasons to doubt this claim.

In a few parks, NAP has planted native plants to replace non-natives that it cut down. Most of the trees did not survive. NAP and its supporters cut down 25 young trees at Tank Hill about a decade ago. The few trees that NAP left standing had their limbs severely cut back to allow more sunlight to reach a newly planted native plant garden. Only four of the more than two dozen live oaks that were planted as replacements have survived. NAP may claim they will plant native trees to replace the healthy non-natives cut down, but most won't survive and the character of the parks that once had healthy forests will change.

## **8.0 NAP UNJUSTLY ENRICHES NAP PROPONENTS**

Those proposing these “natural areas” have been given unwarranted credibility by management at SFRPD who share their philosophy. Many of these people arrived as consultants from other places years ago—they are not long term residents of San Francisco. I'm referring to the likes of Lisa Wayne, Elizabeth Goldstein, Yomi Agunbiade and the entire cast of non-native humans who have been attempting to impose their vision as to what our parks should be on the citizenry of San Francisco. Their vision is completely arbitrary – one of San Francisco circa 1850.



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Those of us born and raised in San Francisco can speak for friends, family and acquaintances when we say the majority of people in San Francisco prefer the status quo. They treasure their recreational areas, and wish they had more. They love mature trees in the landscape, and they want their parks to look as they did before NAP. The consultants originally proposing these natural areas have reaped great financial gains as NAP is implemented. There has been no effort in this EIR to balance their obvious bias against the wants and needs of the citizens of San Francisco.

NAP is a financial imperative for the highly paid NAP bureaucrats, the specialized NAP gardeners, NAP consultants, the vendors who supply the goods and services to the program and the special interest environmental groups who have conned their big dollar contributors into thinking they are actually saving the planet. Rather than a noble attempt to save embattled species of plants, in reality, NAP is a veritable cash cow for those even tangentially associated with the program.

## 9.0 IS THERE A PREFERRED ALTERNATIVE?

**Yes**, but this EIR does not include it. This EIR is designed only to promote NAP which for the reasons outlined above is unconscionable.

Our Preferred Alternative would set aside 50 acres scattered about the City where conversion to natural areas is not overly destructive. This would:

- minimize loss of recreational facilities in our crowded urban environment
- recognize preferences of native plant advocates
- still provide areas to protect all species endangered or otherwise
- provide an educational forum for native plant advocates
- save lots of taxpayer money
- minimally impact air quality by saving approximately 100,000 trees
- preserve the landscape the way the vast majority of San Franciscans like it

Our own, as well as previous generations of San Franciscans have expended considerable blood, sweat, tears and capital to beautify our parks from their barren state of the 1850's. They did so with the very flora that these non-native humans today so callously label "non-native invasive weeds".

Fifteen years ago, we were still planting Cypress, Monterey Pines and Eucalyptus in order to beautify our parks. Years from now, after NAP has destroyed the ecosystem, we will once again be planting Cypress, Monterey Pines and Eucalyptus.

Comment submitted by:

Dr. Suzanne M. Valente and Stephen R. Golub

Vittori-1

**Bock, John**

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**From:** Jessica.Range@sfgov.org  
**Sent:** Tuesday, November 01, 2011 3:51 PM  
**To:** Bock, John  
**Subject:** Fw: NAP comments  
**Attachments:** NAP letter.pdf

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](http://www.sfplanning.org)

----- Forwarded by Jessica Range/CTYPLN/SFGOV on 11/01/2011 03:51 PM -----

Bill  
Wycko/CTYPLN/SFGO  
V  
To  
Jessica Range/CTYPLN/SFGOV@SFGOV  
11/01/2011 03:28 PM  
cc  
Subject  
Fw: NAP comments

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 11/01/2011 03:29 PM -----

Lisa Vittori  
<lisavittori@yahoo.com>  
To  
"bill.wycko@sfgov.org"  
10/31/2011 04:53 PM  
<bill.wycko@sfgov.org>  
cc  
Lisa Vittori  
<lisavittori@yahoo.com>  
Please respond to  
Lisa Vittori NAP comments  
<lisavittori@yahoo.com>  
Subject

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Dear Mr. Wycko-

I did restoration as a professional and a volunteer for 20 years. I ran a crew with the California Conservation Corps and the National Park Service doing habitat restoration all over the Bay Area. I worked on Bernal Hill, McLaren Park, Glen Canyon, and Sharp Park as a volunteer and community member. Unfortunately, what I have seen has saddened me; I think we've betrayed the principles of integration and inclusion that we started out with. Over time the restoration movement has become exclusionary, pushing the community out of the parks.

This process is a perfect example of community exclusion. I go to Bernal Heights, Glen Park, Stern Grove, Pine Lake, and McLaren Park with my dogs several times a week. There are no official notices anywhere inviting public review. When advocacy groups place notices on the bulletin boards, they've been torn down.

Please pay attention to the numerous efforts we have made over the years to make the Natural Areas Program more integrated with city life. I've attached a summary written by Sally Stephens of SFDog. She states, better than I could, the numerous attempts by the public to make this process fair and inclusive. I attended many of these meetings, and have come out with a much more jaded view of the democratic process.

The saddest part is that we could do habitat restoration right. We could easily integrate restoration with existing park uses.

Thank you for your time.

Lisa Vittori  
PO Box 31897  
San Francisco, Ca 94131  
415-931-3075(See attached file: NAP letter.pdf)

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## **THE NATURAL AREAS PROGRAM BACKGROUND INFORMATION**

The Natural Areas Program (NAP) of the San Francisco Recreation and Park Department (RPD) was originally intended to preserve the few remnants of San Francisco's natural heritage that still existed in city parks. The plan has morphed, however, into an empire that controls one-quarter of all the parkland in San Francisco (one-third of all parkland managed by RPD if you include Sharp Park in Pacifica). Its management plans have become quite controversial, with proposals to cut down healthy trees, drench hillsides in herbicides, close trails and off-leash areas, relocate or kill feral cats, and restrict access for all people to large sections of our parks.

For nearly two decades, NAP has operated with no real oversight and little input from the public about its plans. Its modus operandi is akin to "I know better than you, so go away." Despite years of attempts to get even small amounts of accountability from NAP, the program continues to do pretty much whatever it wants in our city parks. Because, in many cases, NAP claims control of entire neighborhood parks, San Franciscans are losing access to their common "backyards", and most have no idea it's happening until it's done.

### **BEGINNINGS**

In 1991, Policy 13 was added to the Recreation and Open Space Element (ROSE), a document that gives general policy directions for open space in San Francisco. Policy 13 (actually Policy 2.13) sets forth a general policy goal to "preserve and protect significant natural resource areas." Policy 13 sets the following criteria to determine what is a natural area:

- 1) The site is undeveloped and relatively undisturbed, and is a remnant of the original natural landscape and either supports a significant and diverse or unusual indigenous plant or wildlife habitat or contains rare geological formations or riparian zones.
- 2) The site contains rare, threatened, or endangered species, as identified by the U.S. Fish and Wildlife Service or California Department of Fish and Game, or contains habitat that has recently supported and is likely again to support rare, threatened, or endangered species.
- 3) The site is adjacent to another protected natural resource area and, if protected from development, the two areas together would support a larger or more diverse natural habitat.

The policy also says: "Native plant habitats should be preserved and efforts undertaken to remove exotic plant species from these areas."

Policy 13 has been used by NAP advocates to imply a city mandate to preserve natural areas, a mandate that justifies all the restrictions, herbicides, closures, etc. However, the ROSE is actually an advisory document that sets out guidelines, not mandates. It does not have the force of law.

On January 19, 1995, the SF Recreation and Park Commission approved the first management plan for natural areas. This plan identified "candidate" natural areas, and established guidelines for management programs in the areas. The plan called for a consultant to develop the specifics of the implementation of the plan. It also made a commitment to include the public and community organizations in discussions as the plan evolved. The Natural Areas Program, however, did not honor this commitment.

In 1997, the Recreation and Park Department (RPD) signed a contract with EIP Associates as the consultant to develop the ways to implement the plan. According to the contract, EIP was to form a Scientific Advisory Board (SAB) that would meet two to three times per year for a period of three years. SAB members would be paid an

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honorarium for each meeting; the cost of the honorariums was included in the RPD budget. A 2001 draft of the consultant's report stated: "A scientific advisory board, made up of experts in related fields, provided direction and advice during the project's planning and preparation."

### NO OVERSIGHT

In fact, Dr. Ed Connor, a member of the SAB, told the SF Board of Supervisors in August 2002, "... the members of the SAB had never seen or been asked to comment on a draft of such a plan in any state of its preparation." They were not paid any honoraria. Drafts of the management plan developed by EIP Associates were supposed to be circulated to a citizen's task force and local community groups. Instead, the first draft was seen only by NAP staff, who then returned it to EIP for revision without seeking any public input on it. NAP was steaming full speed ahead without any real community oversight or input.

In the parks, NAP and its supporters cut down and girdled hundreds of trees (in which the bark is cut completely around the tree, interrupting the flow of sap and nutrients and eventually killing the tree). Fences were erected, blocking access to large sections of parks. NAP staff did not bother to consult with (or even tell) park neighbors and users what they were doing in the natural areas. NAP operated in a secret and arrogant manner.

At the same time, the consultant's draft management plan was finally made available to the public at only one location (the main library). For the first time, people saw the extent of NAP's plans – removing and killing non-native animals, including feral cats; closing trails; putting up fences; and prohibiting fishing and boating where it had traditionally been allowed. The draft management plan made clear that NAP staff and advocates had intentionally planted species of endangered and threatened plants and animals in natural areas. Because of the special status of these species, federal law requires severe restrictions on access wherever they occur. NAP essentially presented the public with a fait accompli of access restrictions before people knew what was happening.

By 2002, people had noticed major changes in some natural areas that they did not like, and they began complaining. In response, RPD formed a Green Ribbon Panel to advise RPD and EIP about the NAP management plans under development. Critics were not happy with the composition of the Green Ribbon Panel, which they viewed as composed primarily of native plant advocates. The Park and Recreation Open Space Committee's (PROSAC) representative to the Green Ribbon Panel, Dr. Joan Roughgarden, confirmed the Panel's bias. In a report to PROSAC, Dr. Roughgarden wrote, "The Green Ribbon Panel was selected on the basis of political advocacy, not on technical credentials, so that discussion of the technical merits of the plan is immediately interpreted in an advocacy framework." Roughgarden continued,

"The management plan advances a highly interventionist view of resource management that is not viable ecologically, economically, or culturally."

*[Dr. Roughgarden's critique: Appendix 1]*

In response, PROSAC passed a resolution calling for a scientific review of the management plan. The Recreation and Park Commission did not respond to the request.

### NAPCAC

NAP critics complained to the SF Board of Supervisors that the way the management plan was being implemented had not been properly vetted, and that NAP was not considering the public's input, as promised by the Recreation and Park Commission in 1995. The Board held three hearings on NAP, beginning in July 2002, and, in response, on September 24, 2002, the Board created a Citizen's Advisory Committee for the Natural

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Areas Program (NAPCAC). The Board of Supervisors gave NAPCAC a year to develop a management plan for natural areas and provide a summary report of its findings. NAPCAC would meet under Sunshine Ordinance rules, so the public would be able to see exactly what it was doing. The Board's resolution disbanded the Green Ribbon Panel and replaced it with NAPCAC. The resolution allowed NAP staff to continue to maintain natural areas as long as their actions did not include: "the removal of healthy trees that pose no safety hazards; trail closures, or restrictions on access and recreation; trapping and removal of wild or feral animals currently inhabiting parks and lakes; and expansion of activities into areas that no longer support predominantly native flora and fauna."

NAPCAC had 12 members, four who were knowledgeable in issues related to natural areas (e.g., restoration, ecology, environmental advocacy), four who were interested in access to and use of parks and open space (e.g., recreational users, neighborhood activists, youth and tree advocates), two at-large members recommended by the Board of Supervisors, and two at-large members recommended by RPD. The Board of Supervisors approved the twelve appointments to NAPCAC on December 18, 2002.

The Board's resolution creating NAPCAC directed RPD to assist NAPCAC, including giving notice of meetings, providing meeting space and publishing minutes. However, RPD repeatedly denied NAPCAC members' requests for meeting space. Finally, NAPCAC members took it upon themselves to find meeting space. NAPCAC met for the first time on February 13, 2003 in the Mission Police Station Community Room. Later meetings were held in a classroom at City College.

At its first meeting, NAPCAC vote unanimously to ask RPD for staff support to provide minutes and to copy and distribute materials to the Committee and member of the public. RPD declined to provide staff to take minutes, but offered to copy materials as long as they were submitted two weeks in advance. Since NAPCAC met every two weeks, this "offer" was largely meaningless.

NAPCAC members complained to the Board of Supervisors about the lack of RPD support. At a City Services Committee hearing on May 15, 2003, speakers showed pictures of fences in three different natural areas that had been built since the Board's NAPCAC resolution had been passed, in direct violation of the resolution's ban on controversial management actions while NAPCAC was meeting. At the hearing, RPD General Manager Elizabeth Goldstein claimed a verbal agreement with Supervisor Matt Gonzalez that RPD would not be required to provide any support to NAPCAC. After the hearing, an aide to Supervisor Gonzalez told the Chair of NAPCAC that the Supervisor had made no such agreement.

NAPCAC continued to meet. A member of the NAP staff attended every meeting, and their message to NAPCAC, given at the end of every meeting (during general public comment) was fairly consistent – you're wasting your time and we will ignore you and your findings. For example, on May 8, 2003, Lisa Wayne, the head of NAP, told the Committee, "The Committee has misinformation and misperceptions. The Committee is spinning its wheels, creating controversy where there isn't any. There is fear being perpetuated in this room. I'm the person that knows these parks better than anyone else in the City." NAP supporters in the audience at meetings verbally attacked NAPCAC members, and disrupted the meetings by talking loudly among themselves during panel discussions.

NAPCAC met for nine months. At these meetings, NAPCAC members who were critics of NAP actively engaged in negotiations, introducing repeated iterations of plans that tried to address concerns raised by NAP advocates. NAP advocates did not introduce their own plan until the next to the last meeting, instead choosing to react to plans introduced by the "other" side and insisting on compromise from them. For example, NAP advocates insisted that NAPCAC accept all 31 of the natural areas that NAP had claimed for itself, even though many had no native plants in them and had been designated as natural areas without any public input.

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## NAPCAC FINAL REPORT

Because of the repeated compromises by their side, NAPCAC's final report was barely acceptable to those members who had opposed the way NAP was being administered. Yet they voted to accept the final report because it created a process of scientific and community oversight of the NAP. Unable to convince a majority of NAPCAC members to acquiesce to further demands, NAP advocates on the Committee refused to support the final report that contained the compromises that they had insisted upon. The NAPCAC final report was passed by a vote of 7-5 on November 14, 2003, meeting the one-year deadline imposed by the Board of Supervisors in the resolution that created NAPCAC.

The NAPCAC Final Report, co-authored by two ecology/conservation biologists on the Committee, Drs. Joan Roughgarden and Ed Connor, set up a Natural Areas Program Review Committee (NAPRC) that would review and consult with NAP about its plans to manage natural areas. NAPRC would be composed of 12 members, including four scientists with research credentials in relevant fields (ecology, botany, zoology, conservation, etc.), four representatives of citywide advocacy groups, and four representatives of local neighborhood and park advocacy groups. Committee meetings would be conducted under all Sunshine Ordinance requirements, to ensure no backroom deals were made.

*[NAPCAC Final Report: Appendix 2]*

The Final Report called on NAP to develop a system-wide "portfolio" plan that would (section 5.1): "provide an overview of the entire system of Natural Areas, showing how each site contributes to the overall goal of the program. This portfolio plan should outline the overall Natural Areas Program conservation and educational goals, specify the priorities for implementation of conservation plans for individual parks, and outline how the acquisition of additional properties will enhance the ability of the NAP to meet its conservation and educational goals." The Final Report recognized that every city park has different issues and doesn't try to enforce a city-wide, one-size-fits-all solution to those problems. The Final Report went on to say (section 5.3): "Detailed plans for the conservation measures to be implemented at each site and how public input will be integrated into each site plan will be developed simultaneously and in parallel by the two subcommittees of NAPRC..."

According to the Final Report, the NAPRC would have two subcommittees, a Scientific Subcommittee and a Community Relations Subcommittee, with six members each. The Scientific Subcommittee would review the management plan at each natural areas site to determine (section 7.1):

1. Is it scientifically plausible that the proposed management activities will achieve the proposed outcome?
2. Are the proposed monitoring plans adequate to identify any unforeseen consequences that may arise during the implementation of the plan?
3. Have the secondary consequences of management activities been identified?
4. Is the proposed evaluation plan adequate to determine the success of the plan?
5. Are the educational materials scientifically accurate?

The Scientific Subcommittee would provide the scientific oversight of the management plans that the original consultant and later the Green Ribbon Panel were supposed to do but did not.

The Community Relations Subcommittee would review community outreach plans by the NAP to determine community whether the community was served (section 9.1):



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1. Does the local community favor the proposed management practices for the sites in their district?
2. Has a good faith effort been made to solicit and incorporate public comments on individual site plans?
3. Has the local community been adequately informed of both the potential benefits and secondary consequences of the proposed plan?
4. Have other relevant city Commissions (e.g., Animal Control and Welfare, Urban Forestry Council, etc.) been informed and consulted about any management practices proposed for the Natural Areas?
5. Does the community have any changes they wish to make to the proposed plan?

The Community Relations Subcommittee would ensure that adequate community workshops and meetings were held by NAP, and that professionally designed surveys were conducted to measure public support among park neighbors and users for NAP's plans at each site.

The NAPCAC Final Report expressed strong support for the NAP, and encouraged increased funding and staff for it, especially to handle the added responsibilities of the NAPRC. With the release of its Final Report, NAPCAC was disbanded.

### **MINORITY REPORT**

On January 7, 2004, the Board of Supervisor's City Services Committee heard testimony on the NAPCAC final report. NAP staff and NAP supporters attacked the NAPCAC final report, producing a "minority report" that called for citywide mediation – not any oversight committee – to resolve NAP conflicts. This minority report was written over a month after NAPCAC had been disbanded, and is entirely different from the final plan NAP advocates had presented at the next-to-last NAPCAC meeting. Unlike the NAPCAC Final Report, neither any of the majority members of NAPCAC nor members of the public had an opportunity to comment on the Minority Report before it was introduced to the City Services Committee. Despite this lack of transparency, NAP advocates demanded that it be given equal weight to the Final Report.

NAP critics were concerned. Mediation can work, especially when dealing with a single issue. But NAP issues are many and varied, and affect a multitude of park users and neighbors. In addition, mediation typically takes place in secret, allowing NAP to continue to operate without public oversight. In practice, the people invited to mediation (especially a citywide mediation) represent advocacy groups, not average citizens, further diluting the ability of park users and neighbors to influence what happens in their neighborhood parks.

Ultimately, the City Services Committee took no action on the NAPCAC Final Report. As a result, NAP was allowed to continue on its merry way with little oversight or input from the public.

Later in 2004, an informal working group, with both NAP advocates and NAP critics was established to discuss changes in the way NAP managed the lands under its control. RPD staffer Dan McKenna mediated the negotiations. The idea of three different management zones, from MA-1 for the most sensitive parts of a natural area to MA-3 for the least sensitive, came out of these informal negotiations. The group met for about six months. The informal working group thought they had reached an agreement on what the NAP Management Plan would look like.

But when the NAP Draft Management Plan was released in June 2005, NAP critics who had taken part in the informal working group felt that promises made had been reneged upon, and they fought against its adoption.



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## MANAGEMENT PLAN APPROVAL AND EIR

In July 2006, the Recreation and Park Commission considered whether to approve the Draft NAP Management Plan or not. The hearing was attended by hundreds of people. So many people wanted to speak that, even though people were given just one minute to speak, the Commission ran out of time. The item was continued to the August 2006 Commission meeting. At both meetings, people expressed concerns about cutting down healthy trees, killing feral cats, closures of trails and off-leash areas, overuse of herbicides, and general concerns about the loss of access for people to large parts of their parks, the same concerns expressed from the beginning of the program.

The Commission unanimously approved the NAP Draft Management Plan, after adding two minor changes to the plan: 1) the least sensitive MA-3 parts of natural areas would be managed by the RPD Urban Forestry staff, and both native and non-native trees could be planted in MA-3 areas; 2) feral cat "relocation" (a nice euphemism for "killing") would happen only after the Recreation and Park Commission determined that other means of population reduction had failed to adequately reduce the number of feral cats in a natural area. These two changes were the only changes made to the Draft Management Plan by the Commission in response to the torrent of criticism the NAP plan had received.

The Commission then ordered an Environmental Impact Review of the NAP Management Plan that it had approved. The Initial Study for the NAEIR was published in April 2009. The comments submitted are included as Appendix A of the Draft Environmental Impact Review (EIR) for the NAP Management Plan that was released in August 2011. [\[Click here to see Appendix A\]](#).

Interestingly, many of the concerns about the NAP Management Plan raised in the Initial Study are still problems with the Draft EIR. Those who prepared the Draft EIR do not appear to have incorporated very many of the criticisms. Indeed, they don't seem to have listened to the critics at all.

This lack of concern for what people think by NAP has been a problem since its inception. NAP seems to only listen to its most zealous supporters, and ignores the rest of us.

Public comment on the Draft EIR is due on October 31, 2011. A final EIR (that will supposedly address comments submitted about the Draft EIR) is scheduled to be released in Spring or Fall 2012. Once the EIR is finalized and certified by the Planning Commission, we have been told that it will go back to the Recreation and Park Commission to acknowledge the certification and authorize the implementation of the NAP General Management Plan that it approved in 2006. Major changes in your neighborhood parks are coming as the NAP plan is fully implemented, whether you want them or not.

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## **APPENDIX 1: DR. ROUGHGARDEN'S CRITIQUE OF NAP**

Sept. 1, 2002

Dear Fellow Members of PROSAC,

I'm sorry to be out of town on Tuesday and not able to participate personally in the discussion of the Natural Areas Program (NAP) scheduled on the agenda for Sept. 3. Perhaps I can be of help by offering some comments in this note.

As your representative to the Green Ribbon panel, I have attended the two meetings since I was appointed, have read through the entire draft plan, and have participated in the process. Several conclusions and recommendations can be drawn at this point.

### **Content of Management Plan**

The management plan advances a highly interventionist view of resource management that is not viable ecologically, economically, or culturally.

The plan was developed by a consulting firm, EIP Associates, specializing in environmental impact reports.

a. About half of the specific recommendations have some variant of the words, kill, clear, cut, or control. To illustrate, consider Lake Merced, chosen here simply because Lake Merced is the first of the parks mentioned in the report. Recommendations for the other parks follow in the same vein. On p. 6.1-12--6.1-20, the phrases, "remove eucalyptus, pine, acacia... remove cape ivy ice plant, English ivy, ehrharta, Bermuda buttercup, pampas grass, and sheep sorrel... clear pest species, monitor annually for new invasions... create open grassland through vegetation management and control of invasive plants... trap and remove non-native turtle species... remove all bullfrogs... stock with largemouth bass and catfish... signs, fences and increased enforcement to discourage free-running dogs in unauthorized areas" illustrate the flavor of the specific recommendations made for each park. Yet, in dry parks, water fountains are planned to benefit some favored species.

b. General recommendations that apply to all parks include, "areas of native-dominated vegetation shall be weeded on a routine basis to preserve the integrity of the native plant species and reduce the infestation of non-native species (p. 5-2)... as stands age small groups of trees could be removed within the forest and replanted with the appropriate native species (p. 5-2)... control feral cat populations through a trapping and removal program (p. 5-6)." Furthermore, the "vegetation management decision process" includes two decision points that lead to the use of herbicides: "Is Plant Safe to Handle? No->Is Animal Control Feasible and Efficient? No->Apply Herbicides" and "Is Hand Removal Feasible and Efficient? No->Apply Herbicides" (p. 4-13). The herbicide used is Roundup Pro (p. 4.4).

c. These recommendations are not ecologically viable. Introduced species cannot be eliminated by weeding because of dispersal and presence in the soil's seed bank, bullfrogs cannot be eliminated by volunteers with pitchforks tromping through the marsh at night spearing frogs when thousands of tadpoles swim in the waters (also, usually only a subset of the males call at night, and the non-calling males and females are not locatable), feral cats cannot be trapped out against a stream of influx from neighboring sources, herbicide use is anathema to natural ecosystem function, and so forth. Furthermore, the entire suite of recommendations is not gauged against an index of the conservation potential of each site, as would be revealed in total species-area and nested-subset species area graphs and tables. I have called for this information, but these elementary statistics used in

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conservation and restoration ecology have not been provided. All in all, the recommendations are ad hoc. The recommendations are simply listed without justification, or reference to any justifying literature.

d. The recommendations are not economically viable. The ecosystem envisioned is a human subsidized system, not a self-sustaining ecosystem. The envisioned ecosystem amounts to a grand exercise in horticulture, not to the restoration of a natural ecosystem.

e. Of particular importance to PROSAC, the continuing expenses these recommendations require would apparently be debited from the capital improvement account, and be tantamount to coding maintenance expense as capital expense.

f. The recommendations are not culturally viable. As many have noted, the language used for introduced species is racist and sexist. Introduced plants and animals are not people of course, and cannot object to how they are described. Still, the language in the management plan is insensitive, inviting a carry-over to human affairs, and opening the possibility of naturalizing racist rhetoric in the name of science. In fact, ecology does not privilege the native over the introduced. Every species is native somewhere. The N in NAP has been appropriated to mean native. The goal of the NAP should be to create natural self-sustaining ecosystems that serve the citizens of San Francisco. The NAP should include native species to conserve our biological heritage, as a "natural museum," just as human museums conserve and exhibit our maritime traditions. Even maritime buffs don't suggest that North Beach be restored to a fishing village. Our moral obligation to prevent the extinction of native species does not license the persecution of introduced species.

### **Public Process for Review of Management Plan**

The process being implemented for review of the management plan is not viable politically.

a. No protocol is available to ensure that comments raised by the Green Ribbon Panel are incorporated into the management plan. Although written comments about each of the specific recommendations have been solicited from panel members, EIP has stated publicly that they will make their own subjective and private evaluation about which comments to take into account in any revisions. This absence of any guarantee that comments will be considered is a disincentive to offering feedback, and has provoked frustration and anger among parties who wish to influence the result.

b. The Green Ribbon Panel was selected on the basis of political advocacy, not on technical credentials, so that discussion of the technical merits of the plan is immediately interpreted in an advocacy framework. With public attention and opposition building to the NAP, a circle-the-wagons atmosphere has formed, with any criticism of the plan seen as the onslaught of barbarians. This polarization has subverted the capability of the Green Ribbon Panel to offer substantive feedback.

c. By keeping the public at arms length, the consultants doomed the management plan to controversy from the start. The modern approach to ecosystem management uses the concept of ecosystem services, and asks how an ecosystem should be configured to deliver the services people desire. By knowing what people want from their NAP's to begin with, a plan that melds these needs, including the need for conservation, can be achieved. Even more recently, ecosystem management is being cast in an economic framework using the approach of ecological economics to help sort the allocation of ecosystem resources among competing demands.

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### **Recommendations**

A two-tier process for developing a NAP management plan should be substituted for the current process, and EIP Associates should be terminated as the contractor responsible for developing the plan.

a. The first tier of review should be a small working group of six people, four of whom are appointed for technical expertise and two of whom represent community constituencies. The group's meetings should be public, but focused on a technical review of the management plan. This body should be charged with making recommendations for revisions to the plan, and the contractor should be required to accept the recommendations, or to state publicly why not. This group should meet for six months, and interact with the tier-2 group below.

b. The second tier should be a larger review body of twelve people, eight of whom represent community constituencies, and four selected for technical expertise. This group should be charged with evaluating the extent to which the community's needs are being served by the management plan, to suggest revisions, and ultimately, to endorse the plan before release for general public comment. This group should meet for four months, overlapping the last four months of the tier-1 group, and providing opportunity for interaction.

c. The reports of both tiers of review should be referred to the Recreation and Park Commission or Board of Supervisors, for forwarding to the Department, to ensure that the recommendations are taken seriously.

d. EIP should be terminated because:

1. EIP has not developed a credible resource management plan for the NAP.
2. EIP has not effectively facilitated a public review of the management plan for the NAP.

3. EIP does not have the personnel to develop a management plan for the NAP. EIP's strengths lie in hydrology and geographic information systems (GIS). Yet, the controversial aspects of the NAP pertain primarily to biological restoration and conservation aspects of the parks, not to geologic and geographic issues. Instead, a different firm should be retained that can build on the foundation of GIS maps and the species database that EIP has generated.

Sincerely,

Joan Roughgarden

PROSAC Representative  
Supervisory District 6  
San Francisco CA

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## APPENDIX 2

### MANAGEMENT PLAN FOR THE NATURAL AREAS PROGRAM

**Developed by the Natural Areas Program Citizen Advisory Committee  
(NAPCAC) as per resolution 653-02**

November 14, 2003

#### 1.1

San Francisco is blessed with a diverse biological heritage in addition to its beautiful physical surroundings. The same geologic processes that produced its rugged coastline, the bay entrance at Sea Cliff, the hills of Twin Peaks, and the wetlands of Mission Bay produced many opportunities for the plants and animals of our peninsula to differentiate into unique and precious forms not found anywhere else. Moreover, the varied microclimates in our city support a range of ecological communities and ecosystems from maritime to grassland, from rocky coasts to shallow salt marsh. The history of volunteer stewardship in our natural areas helped raise awareness of the need for responsible stewardship of these natural treasures and has prompted the city's General Plan to include Policy 13 declaring the City's clear and strong intention to support conservation. The Natural Areas Program (NAP) of the Department of Recreation and Parks is one of the city's methods to this goal.

#### 1.2

The goal of conserving San Francisco's biological heritage needs to be accomplished in an urban setting, taking into account the many uses that our park lands serve. Also, the tactics employed to conserve our biological resources need to have a reasonable promise of success, and their secondary consequences spelled out. The local communities and park users must be involved in designing and agreeing to the various trade-offs required in the balancing of requirements for multiple uses, and city-wide goals must be furthered as well.

#### 1.3

The Natural Areas Program Citizen Advisory Committee (NAPCAC) was established by the Board of Supervisors Resolution No. 653-02 adopted on September 24, 2002. This document offers NAPCAC's recommendations to the Board of Supervisors on how the NAP should be managed. Our vision is that the city's system of Natural Areas should be a source of civic pride and should take its place along with museums, art galleries, concert halls, libraries, and other assets that define San Francisco as one of the world's best places to live, work and visit.

## SAN FRANCISCO NATURAL AREAS

#### 2.1

Appendix 1 lists the 31 sites presently considered Natural Areas. We appreciate that many members of the public have disputed the listing of specific parks within this list because the public process that has led to their designation has at times been irregular. Nonetheless, we accept this list as a *de facto* starting point, and focus on

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process to ascertain what activities shall occur within these sites, and on procedure by which new sites might be added and others dropped as the program evolves.

## 2.2

Figure 1 presents a map of the location of these sites. Collectively, they span places near the ocean on the west to the bay on the east, and include lowlands and hills.

## GOALS AND CONSIDERATIONS

### 3.1

During our meetings we heard many statements of goals and values that members of the public wish to see achieved and respected by NAP. By offering a brief narrative of these, we set the stage for the specific recommendations that follow.

### 3.2

One conservation goal, and the one we recommend here, places highest value on species and varieties that are unique to San Francisco, as well as those listed species the City is required by the endangered species act to protect. The area encompassed by the city features native plants and animals found nowhere else, plus others found only in the San Francisco Bay region. We recognize that more species are of special value than presently listed as endangered or threatened in Federal and State lists, and that being proactive using local knowledge can supplement such lists. Focusing on the inherent value of species and varieties means habitats are valued as places that provide a home for them. The importance of conserving habitats therefore derives from the importance of conserving species and varieties. For this goal, conservation practice should consist of steps that promote the population viability of the species and varieties of special interest.

### 3.3

Another conservation goal places value on representative habitats themselves. Pre-colonial San Francisco featured dune-scrub communities, oak woodland, freshwater ponds, and riparian corridors. Appendix 2 from the Society of Ecological Restoration (SER) in April 2002 is *The SER Primer on Ecological Restoration*. According to SER, ecological restoration assists the recovery of a degraded, damaged, or destroyed ecosystem, and returns it to its historic developmental trajectory. Criteria for a restored ecosystem include: it contains the characteristic assemblage of species seen in a reference ecosystem, all functional groups necessary for the continued development and/or stability of the ecosystem are present, and the restored ecosystem is self-sustaining to the same degree as its reference ecosystem. Focusing on restoring healthy ecosystems means species are valued because of their role in ecosystem functions. The importance of conserving species therefore derives from their importance to ecosystem function. Biodiversity is not valued for itself, but for its possible contribution to ecosystem resilience. For this goal, conservation practice should consist of steps that protect native species and reintroduce missing species that are essential for ecosystem function.

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### 3.4

Many people affirm both species and habitat conservation goals, but others do not. To some, certain habitats have little value in themselves whereas the species are of primary interest, and to others the aesthetic or spiritual sense of the landscape is more important than the details of which species occur there.

### 3.5

Another goal debated at NAPCAC meetings is whether a Natural Area should be self-sustaining. The ecological tradition, especially in North America, emphasizes attaining self-sustainability, whereas the horticultural tradition envisions continual human involvement. As SER writes in their *Primer*, when “the ecosystem under manipulation may no longer require external assistance to ensure its future health and integrity... restoration can be considered complete.” In contrast, many have spoken of limitations inherent in an urban park, and argued that every species and habitat will always require continual maintenance, and that self-sustainability is an impossible goal. By this view, Natural Areas are relatively large botanical and zoological gardens stocked mostly with native species. This view of Natural Areas is similar to a European model, in which people even construct the nest boxes for bird populations in wooded parks.

### 3.6

It is impossible to reach compromise later on further issues such as criteria for success, program costs, multiple uses, and openness of access without offering guidance on how the conflicts concerning the goals of conserving species, conserving habitat, and attaining sustainability are resolved to begin with. We endorse both the goals of conserving species and of conserving habitat, but suggest a greater present emphasis on species rather than on habitats *per se* for reasons below. We endorse the goal of long-term sustainability for natural areas, including as much self-sustainability as possible, following the North American rather than the European model, for reasons below.

### 3.7

The reason for emphasizing species over habitats is that the goal of species conservation is presently more attainable and defensible than that of habitat conservation. To obtain self-sustainability for a population, clear criteria exist: the demographics for the species must be positive, that is, its birth rate plus immigration rate must exceed its death rate and emigration rate. Appendix 3 shows the species-area graph for the natural areas. Seven of the largest presently support over 100 native species of plants plus an unknown number of animal species as well. Every species inherently has a “self-seeding” scale, which is the minimum area a site must have to support a self-sustaining population of that species. Species with low reproductive rates and long dispersal distance need bigger sites than species with high reproductive rates and short dispersal distances. The large sites in the NAP are already sustaining many species. Meanwhile, the small sites could sustain more than their area might suggest provided the species in them are subsidized by seed and pollen flow from native plantings in neighboring residential areas, thus leveraging the conservation value of the small sites. Furthermore, species and varieties are relatively well-defined, managing for species conservation is not new, and has a track record of legislative support and judicial precedent.



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### 3.8

In contrast, objective criteria cannot be given even to define habitat types. No official definitions exist for “coastal scrub,” “coastal prairie” and so forth. The literature supplied by NAP contains limited citations, not because of poor research on NAP’s part, but because a habitat type is fundamentally not as well defined as a species is. Without a reliable definition of the habitat types, it’s nearly impossible to indicate what would constitute success for its conservation---is 50% of the original species enough, will 25% do, or even one or two species if they’re conspicuous enough? Furthermore, ecologists do not know how to tell whether an ecosystem is stable or resilient without perturbing it. Simply looking at what’s in the ecosystem doesn’t indicate much about its dynamic integrity. A glance at current publications in professional journals such as *Restoration Ecology* shows a great deal of present debate and research about how to define restoration tactics and endpoints. As Margaret Palmer of the University of Maryland wrote in 1997, “Many untested assumptions concerning the relationship between physical habitat structure and restoration ecology are being made in practical restoration efforts. We need rigorous testing of these assumptions” (*Restoration Ecology*, 5:291—300). We wish to see NAP participate in the ongoing development of restoration ecology. Still, we feel the majority of present emphasis should be tilted toward species conservation, with habitat conservation developed as an outgrowth of species-conservation plans. Furthermore, we await legislative and judicial experience with habitat conservation. There is for example, presently no “endangered habitat act” analogous to the endangered species act, nor have the objectivity of programs focused on restoring ecosystem function been tested in court. Nonetheless, we endorse the objective of conserving a spectrum of the habitats that represent San Francisco’s overall environment. We do not wish to exclude future options for the conservation of ecological processes, environmental education and enjoyment by allowing the indiscriminate loss of habitats because of over-tilting toward the value of species alone.

### 3.9

We support the North American model of a natural area as sustainable, including a possible long-term role for human participation, rather than the European model. We see human activities in the Natural Areas as potentially being included among the other ecosystem processes that also occur there. We are also conscious that establishing a program of intensive human intervention in an ecosystem can be expensive and may divert resources from acquisition and capital improvements or from social services supplied by other city departments. Furthermore, a European-model natural area program would tend to duplicate the missions of the City’s existing botanical gardens and zoo. Also, we suspect that most San Franciscans prefer the Natural Areas to contain largely self-sufficient ecosystems rather than intensively managed systems. So, we endorse plans that promote self-sustainability while encouraging justified and programmatically sustainable human activities as well.

### 3.10

The NAP also serves a valuable education role in San Francisco, a role we endorse and encourage. Still, objection has been raised to the tone in some of the materials distributed by NAP, especially with respect to the value of non-native species. As SER states in their *Primer*, “not all exotic species are harmful. Indeed some even fulfill ecological roles formerly played by the native species that have become rare or extirpated. In such instances, the rationale for their removal may be tenuous.” Demonizing introduced species as enemies has raised unnecessary opposition to NAP, and we endorse a scientific review of the educational literature distributed by NAP.



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### 3.11

Finally, we return to the resolution that authorized NAPCAC. Among the conclusions of the Board of Supervisors, as expressed in the Resolution, were the following concerns:

“The Recreation and Park Department has not fulfilled its responsibilities to ensure public and open process with regard to the Natural Areas Program...”, “Legitimate concerns regarding access to and use of open space [within natural areas] were raised” at a Board of Supervisors Committee hearing on July 11, 2002., “The activities of the Recreation and Park Department Natural Areas Program... have ignored both public process and public policy...” Therefore, a simple continuation of the status quo for managing the Natural Areas is not a viable option. To address the Supervisor’s concerns we offer the following recommendations.

## PLANNING AND REVIEW PROCESS

### 4.1

The Natural Areas Program Review Committee (NAPRC), will convene within 30 days of the appointments, under sunshine rules. This Committee of volunteer citizens will meet as needed to review and consult with NAP about its plans for management of Natural Areas. NAP should submit both a system wide work plan (the portfolio plan) as well as work plans for individual sites.

### 4.2

This committee should be composed of 12 voting members and the Manager of the Natural Areas who will serve ex officio. The voting members will include four scientists with research credentials, preferably PhDs in relevant disciplines such as ecology, botany, zoology, conservation and natural history, four who are representatives of city-wide advocacy groups, and four representatives of local neighborhood and park advocacy groups. The Board of Supervisors will appoint committee members initially. However, the Rec and Park Commission will appoint individuals to fill all subsequent vacancies to the committee.

### 4.3

The initial appointments of members for the committee will be for periods of 1-4 years. In each of the three subgroups defined above (scientists, city-wide community advocates, and neighborhood and park advocates), one member will be appointed for one year, one member for two years, one member for three years, and one member for four years. These staggered terms will result in the entire committee being replaced after 4 years, but only one quarter of the committee will be replaced in any single year.

### 4.4

Three months prior to the end of a committee member’s term, public notice of the vacancy will be made via the RPD website and during regularly scheduled and announced meetings of the NAPRC. Applications from individuals wishing to serve on the committee will be received by the NAPRC and forwarded with comment to the Parks and Recreation Commission for their review and decision. All individuals filling vacancies will serve a term of two years. No committee member can serve for more six consecutive years without rotating off the

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committee for at least one year. Committee members will normally be selected from among individual who are residents of the city of San Francisco, but exceptions can be made to secure the participation of scientists.

#### **4.5**

The committee will contain two subcommittees, a Scientific Subcommittee and a Community Relations Subcommittee. Each subcommittee should consist of at least six members. The scientific subcommittee should normally include, but not be limited to, the four scientists (preferably Ph.D.s), and the community relations subcommittee should normally include, but not be limited to, the four representatives of local neighborhood and park advocacy groups. The responsibilities of this committee and the subcommittees are specified below.

#### **4.6**

The success of the NAPRC should be reviewed and evaluated after five years. A written report should be provided to the Board of Supervisors and Rec and Park Commission. At that time, the Board of Supervisors may decide to reauthorize the NAPRC, modify its function, or terminate its existence.

#### **4.7**

We invite NAP to contribute a letter of support for such a committee at this time.

### **SYSTEM-WIDE PORTFOLIO PLAN**

#### **5.1**

The NAP should develop a system-wide or portfolio plan that will provide an overview of the entire system of Natural Areas, showing how each site contributes to the overall goal of the program. This portfolio plan should outline the overall Natural Areas Program conservation and educational goals, specify the priorities for implementation of conservation plans for individual parks, and outline how the acquisition of additional properties will enhance the ability of the NAP to meet its conservation and educational goals.

#### **5.2**

This portfolio plan will necessarily be more conceptual than will the individual plans for each site. Each year at the first meeting of the full NAPRC, the NAP should submit an update of the Portfolio Plan and the specific activities anticipated for the upcoming year. NAP should indicate their allocation of effort across the sites. Also at this occasion, NAP should indicate potential acquisitions to the system, as well as any sites that have ceased to be effective and are slated for removal from the program. The Portfolio Plan and its updates should be available to the public on the RPD website. The entire committee will receive the system-wide portfolio plan and forward their evaluation to the RPD General Manager and Rec and Park Commission.

#### **5.3**

Detailed plans for the conservation measures to be implemented at each site and how public input will be integrated into each site plan will be developed simultaneously and in parallel by the two subcommittees of NAPRC.

Vittori-1

(e.g., the scientific subcommittee for the site plan and the community relations subcommittee for the community outreach plan).

## INDIVIDUAL SITE PLANS

### 6.1

NAP should present to NAPRC a plan for each site for detailed consideration by both subcommittees and eventual review and endorsement of the full committee by majority vote. Each individual site plan should also be available to the public on the RPD website. Each Plan should contain the following information:

The steps and management practices to be carried out at the site in relation to both long term and short term objectives. It is anticipated that the degree of intervention on behalf of a species or habitat will be scaled to the degree of conservation risk faced by the species or habitat of concern

The proposed outcomes of the Plan.

A timeline for both the proposed management practices and the anticipated outcomes.

A summary inventory of the plant and animal species that currently exist at the site, including any indications of the special significance of these species.

A summary inventory of the present environmental condition at the site, such as wind exposure, and soil and erosion conditions. Significant alterations by humans to original conditions shall be identified if known.

A summary of present recreational uses at the site, as well as any cultural or historical value of the present condition of the site.

A description of the secondary consequences of the management practices, such as:

removal or killing of trees, trail closures, fences and other restrictions on access, restrictions on existing forms of recreation, such as boating, fishing, etc., the potential impact on existing animals, including trapping and removal of animals, use of herbicides, potential for erosion and wind damage resulting from the removal of trees and other non-native vegetation.

A description of the educational aspect of the Natural Area Plan, such as signage and other educational materials.

A plan for monitoring the project during its development, and evaluating its success periodically to its completion. Participation of children and volunteers in these experiments with reported results will contribute to the educational value of the Natural Areas Program.

An estimate of the resources necessary to implement the proposed plan including the current level of volunteer activity and the potential benefit to the NAP site of enhancing volunteer participation and advancing the goal of stewardship.

Vittori-1

## **Scientific Subcommittee Responsibilities**

### **7.1**

The responsibilities of the scientific subcommittee of the committee shall be to review the Natural Area Site Plans prepared by the Natural Areas Program to determine the following:

Is it scientifically plausible that the proposed management activities will achieve the proposed outcome?

Are the proposed monitoring plans adequate to identify any unforeseen consequences that may arise during the implementation of the plan?

Have the secondary consequences of management activities been identified?

Is the proposed evaluation plan adequate to determine the success of the plan?

Are the educational materials scientifically accurate?

### **7.2**

The subcommittee will also review progress reports including monitoring data during the implementation of the plan in order to identify potential problems and make modification to the plans as needed. Recognizing that conservation and restoration practices are experimental, i.e. the outcome cannot be accurately predicted, conservation practices shall include a protocol for on-going monitoring to measure the effectiveness of the practice and to determine whether modifications are required. Therefore records shall be kept of management practices, such as plant lists and planting techniques.

### **7.3**

Records include baseline measures and descriptions of any manipulations of native species, introduced species, and substrate. Subsequent monitoring (annual monitoring, at the minimum) will determine the relative success of different management practices so that future efforts will be informed by the results. The monitoring data will be reported to the Scientific Subcommittee for their review and possible recommendation of modifications to the individual site plans. Participation of children and volunteers in these monitoring programs and reporting the results to the public will contribute to the educational value of the Natural Areas Program.

### **7.4**

The meetings of the scientific subcommittee shall be announced in advance on the website of the Recreation and Park Department and be open to the public.

Vittori-1

## **COMMUNITY OUTREACH PLAN**

### **8.1**

NAP should also present to NAPRC a community outreach plan for each site for detailed consideration by the community relations subcommittee. The Plan should contain the following information:

A record of community workshops held in each district regarding the natural area sites in the district, and presenting and explaining the site plan for relevant sites within that district. These public meetings are to be coordinated with Friends Groups, Neighborhood Associations and other interested parties. The neighbors of each site shall be informed by mail of these public presentations as well as other interested groups by appropriate means. Announcement of the presentation should also be posted at the site so that visitors to the site are informed of the meeting and given the opportunity to attend. Anyone wishing to provide their feedback on the plan in writing can submit comments to be reviewed by the NAPRC. NAP should use available databases to notify as many interested parties as possible. Interested parties may be informed of the meetings by email, postings in a park, posting on the RPD website, and by US mail. NAP will solicit and report on any concerns and issues that were raised. This report will be made available to the public on the RPD website.

Explanation of the ongoing outreach plans at that site to continually recruit and replace volunteers.

Professionally designed surveys to determine the support of the public shall be distributed to the users of the park and the neighbors of the site of the project after the community meeting. The returned surveys shall be reviewed by NAPRC and NAPRC shall consider the survey responses as an important factor in determining the public's support for the NAP plan.

### **8.2**

To facilitate the meetings and help the NAP with public outreach and communication, the NAP should hire a public relations or community-outreach intern. This intern should be working toward an advanced degree in a relevant discipline. The NAPRC may recommend that ~~and~~ the Manager of the Natural Areas Program employ a professional mediator to assist in resolving contentious issues.

## **Community Relations Subcommittee Responsibilities**

### **9.1**

The responsibilities of the Community Relations Subcommittee of the Committee shall be to attend the community meetings and to review the Natural Area Outreach Plans prepared by the Natural Areas Program to determine the following:

Does the local community favor the proposed management practices for the sites in their district?

Has a good faith effort been made to solicit and incorporate public comments on individual site plans?

Has the local community been adequately informed of both the potential benefits and secondary consequences of the proposed plan?

Vittori-1

Have other relevant city Commissions (e.g., Animal Control and Welfare, Urban Forestry Council, etc.) been informed and consulted about any management practices proposed for the Natural Areas?

Does the community have any changes they wish to make to the proposed plan?

## **9.2**

The meetings of the Community relations subcommittee shall be announced in advance on the website of the Recreation and Park Department and be open to the public.

## **Whole Committee Responsibilities**

### **10.1**

The full NAPRC will prepare a written evaluation of the portfolio plan and forward these reports with their findings to the RPD General Manager and Rec and Park Commission. The full committee will receive and evaluate the reports of the subcommittees for each site. Upon favorable review of the reports for individual sites, the full committee will recommend that NAP schedule a final public meeting to receive comments on the final draft plan. After integrating the final public input, the full committee will prepare a written evaluation of the site plan and forward these reports with their findings to the RPD General Manager and Rec and Park Commission.

### **10.2**

Until an individual site plan has been endorsed by the majority of the full committee removal of adult trees, relocation or closure of trails, removal of animals, introducing plants or animals that are listed (endangered, threatened, special concern) or endemic, erection of fences, or other capital improvements specifically proposed in the Natural Area site plan should be delayed.

### **11.1**

The NAPCAC is committed to the success of the Natural Areas Program. Increased staffing and enhanced financial resources will allow the NAP to advance its conservation goals more rapidly. The creation of a Natural Areas Program Review Committee will also incur additional costs to the RPD. The NAPCAC therefore recommends increasing the staff and funding available to the NAP beginning with the City's 2004-2005 budget.

Vitulano-1

**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 11:50 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 11:51 AM -----

**Karen <kv@peoplepc.com>**

10/31/2011 09:29 AM

To bill.wycko@sfgov.org

cc

Please respond to  
Karen <kv@peoplepc.com>

Subject Comments on the NAP EIR

Dear Mr. Wycko -

01

02

I'm writing to express concern regarding the proposal to reduce access for me and my dog for recreation activities and spiritual well-being - the two main uses for me in SF's parks. Hiking with my dog is a main source of exercise for me - it keeps me active and allows me to enjoy nature. I especially enjoy observing the changes that occur with the seasons, such as the many varied mushrooms that sprout up after the rains in the Winter, and the flowering trees in the Spring. I frequent McLaren Park and Bernal Hill, as well as Golden Gate Park and several other parks. The Dog Play Areas (DPA) are important for adults and children, and this impact comes as the GGNRA is also proposing radical cuts to dog recreation space. The cumulative impacts to recreation from these plans are unacceptable. No legal off-leash space should be removed from our parks.

03

The Plan should be more precise and identify specific problem areas where observations directly attributable to dogs have been made. This is not done. It is especially curious why the small DPA at Lake Merced is proposed for closure. This area is hardly used - mainly because its not big enough - but the City should specifically state what the plans are for this area and how restoration is not compatible with continued recreation with our dogs. Mitigation measures should be explored and evaluated for each area that is proposed to be limited, to see if any documented impacts can be reduced through mitigation before closures are considered.

04

I personally see much more damage from people without dogs - especially kids hanging out, breaking glass, littering. The EIR should identify which percentage of impacts are attributable to dogs versus humans.

05

I am also concerned with the use of chemicals, including herbicides like Garlon, which is harmful to dogs. The City should stick with its IPM strategy and emphasize non-chemical methods, or discuss an adaptation strategy for non-natives that considers any ecosystem services they provide.

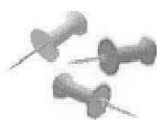
Thanks -

Sincerely -

Karen Vitulano  
4124 Moraga St.  
San Francisco, CA 94122

PeoplePC Online  
A better way to Internet  
<http://www.peoplepc.com>

Von Erb-1



**Bill Wycko/CTYPLN/SFGOV**

10/27/2011 12:11 PM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: Leave the off leash areas for dogs and their owners alone.

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/27/2011 12:11 PM -----



**Jon Von Erb**

<jvonerb@gmail.com>

10/27/2011 11:25 AM

To bill.wycko@sfgov.org

cc

Subject Leave the off leash areas for dogs and their owners alone.

01

It is ridiculous that your org. keeps attempting to close parks and open state and federal land to dogs and their owners. Some time ago SF govt. put section 8 units all over the city opening up the way to theft, property and civilian harm. We only have our trusted dogs to assist us in protecting ourselves from harm. Dogs, like people, must exercise to remain healthy. If there are no places in the city with wide open spaces to run and play and eliminate then we, the owners, will be forced to use our neighbors lawns and other private property to achieve this function.

If you expect the voters in the bay area to vote in improvements for fire and police and parks in general then STOP this outrage against the people of the Bay Area and San Francisco in particular.

It is high time that the needs of, We the People, are considered by our elected and appointed officials.

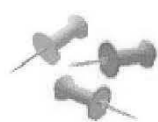
Look at what is happening all over America as well as in San Francisco and Oakland. The people are tired of all this oppression and REVOLT is going to be the only answer to situations like this.

LEAVE OFF LEASH AREAS ALONE AND CREATE MORE SPACES FOR US, THE DOGS AND THEIR OWNERS, TO OCCUPY.

Jon Von Erb, Taxpayer, born San Franciscan, and dog owner.



Wade-1



Bill Wycko/CTYPLN/SFGOV

10/31/2011 11:53 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: NAP EIR

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 11:53 AM -----



npc

<isabelwade@gmail.com>

10/31/2011 11:51 AM

To Bill.Wycko@sfgov.org

cc

Subject NAP EIR

To: Bill Wycoff  
Environmental Review Officer, Planning Department  
From: Isabel Wade  
Date: October 21, 2011  
Re: Natural Areas Plan EIR

Dear Bill,

01 The essential environmental issue related to the proposed Natural Areas Program Management  
Plan is still the same one that many of us have spoken about at public hearings for the last  
decade: the planned destruction of thousands of mature trees. The plan is based on naive  
species preference related to habitat values (always ignoring the scientific studies on habitat  
value of non-native trees), with seemingly no acknowledgement of the vital role that **mature**  
02 trees play in many other aspects of the environment from air quality, storm water reduction, and  
carbon sequestration, wind and dust/particulate reduction. There is also the important visual  
environment for city dwellers and removal of tall trees (usually eucalyptus are the target) in  
many parks such as Buena Vista will significantly alter the vistas and unique visual aspects of  
some of our signature parks.

03 Finally, the cost of the proposed NAP Plan tree removals must be considered in relation to  
implementing this plan. San Francisco's park trees need serious attention and many older ones  
do need to be removed because they are dangerous. However, the Recreation and Park  
Department has almost no funding for this critical task. We cannot afford to maintain even the  
most hazardous trees in the most visited areas of popular parks; how can we possibly justify  
prioritizing the removal of perfectly healthy trees, all at huge financial and environmental cost to  
our City?

Sincerely,

Isabel Wade, Ph.D.  
Founding President, Friends of the Urban Forest, Founder, Neighborhood Parks Council

Walker-1

**From:** Bill Wycko  
**To:** Jessica Range  
**Subject:** Fw: draft EIR  
**Date:** 10/11/2011 05:02 PM

---

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/11/2011 05:02 PM -----

**Josh Walker**  
**<josh.walker@gmail.com>** To bill.wycko@sfgov.org  
cc  
10/11/2011 10:29 AM Subject draft EIR

Hello,

I'm writing to you because I read this article on SFGate.com:

<http://blog.sfgate.com/jscarlett/2011/10/03/dogs-in-the-parks-speak-up-now/>

01 { I'd like to add my voice to those of us who feel that dogs are overrunning our public spaces. Everywhere I go there are dogs running around, often off-leash, urinating and defecating everywhere, and the owners frequently don't clean up after them. I can't take my children to the beach because people simply let their dogs run wild. I take them to the park and I'm having to constantly hover over them to make sure they don't fall into a big steaming pile or run afoul of some aggressive off-leash dog.

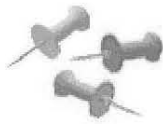
I want to let my kids run free and play, but I really can't. Instead, they end up in the fenced-in playgrounds while the dogs run free in the tall grass.

Please add my support to the idea of more public spaces that are simply off-limits to dogs, regardless of leash status, and to the idea of stricter enforcement of existing leash laws.

Thanks for reading,

Josh Walker  
2535 45th Ave  
SF, CA 94116

Weed-1



**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 11:47 AM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject: Fw: Remove Sharp Park From The Natural Areas Plan!

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 11:47 AM -----



**ThomasWeed@aol.com**

10/31/2011 10:32 AM

To: bill.wycko@sfgov.org

cc

Subject: Remove Sharp Park From The Natural Areas Plan!

01 [ Please consider removing the Sharp Park from the Natural Areas Plan. Thanks,

Thomas Weed  
360-32nd Avenue #12  
San Francisco, CA 94121  
(415) 387-3448  
ThomasWeed@aol.com

Werger-1

**Bock, John**

---

**From:** Jessica.Range@sfgov.org  
**Sent:** Tuesday, November 01, 2011 3:00 PM  
**To:** Bock, John  
**Subject:** Fw: Nap

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](http://www.sfplanning.org)

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

Bill  
Wycko/CTYPLN/SFGO  
V  
To  
Jessica Range/CTYPLN/SFGOV@SFGOV  
11/01/2011 02:58 PM  
cc  
Subject  
Fw: Nap

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 11/01/2011 02:59 PM -----

Al Werger  
<alisonwerger@yahoo.com>  
To  
"bill.wycko@sfgov.org"  
11/01/2011 07:54 AM  
<bill.wycko@sfgov.org>  
cc  
Subject  
Nap

Werger-1

01

Hello- I was working late last night and was not able to get an email to you....I am a sf voter/homeowner/business owner and am completely against the nap plan to take over off leash dog areas- there are more dogs than children in San Francisco and the dogs need a place to go. Especially with all that is happening with the ggnra, it boggles my mind to think that the city would ok this action. What's even more distressing is that most dog owners don't realize that it's happening. I take my dogs to McClaren park and bernal hill regularly and those offleash dog areas need to remain as such.

I am disheartened that this issue is a constant battle. I would think that the city would realize how many dogs are here and how important they are to their owners - who by the way, are the residents and voters of San Francisco-

Please do the right thing and leave the off leash dog areas alone.

Thank you for your time

Alison Werger

Citipets pet store and animal care

member of Fort Funston dog coalition

alisonwerger.com

Sent from my iPhone

Wilford-1

**Bock, John**

---

**From:** Jessica.Range@sfgov.org  
**Sent:** Tuesday, November 01, 2011 3:51 PM  
**To:** Bock, John  
**Subject:** Fw: 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](http://www.sfplanning.org)

----- Forwarded by Jessica Range/CTYPLN/SFGOV on 11/01/2011 03:52 PM -----

Bill  
Wycko/CTYPLN/SFGO  
V  
To  
Jessica Range/CTYPLN/SFGOV@SFGOV  
11/01/2011 03:29  
PM  
cc  
Subject  
Fw: NAP EIR

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 11/01/2011 03:30 PM -----

Linda W  
<tamdiablo@att.net>  
To  
[bill.wycko@sfgov.org](mailto:bill.wycko@sfgov.org)  
10/31/2011 04:49  
PM  
cc  
Subject  
NAP EIR

Wilford-1

01

I am writing in support of the maintenance plan. I was in favor of preserving natural areas in San Francisco when the plan first started, and when I thought these areas were a few out of the way pockets of land, but I don't want to see the areas San Franciscans need for recreation being turned into native plant habitats. We city dwellers don't have big suburban backyards in which to play; our parks are where we go to run around, throw frisbees, toss balls, etc. I am in favor of lots of grass meadows with surrounding trees and flowers.

Linda Wilford  
435 Dewey Blvd.  
San Francisco, CA 94116

Wilson-1



Bill Wycko/CTYPLN/SFGOV

10/31/2011 04:16 PM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: Natural Area Plan Comments

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 04:17 PM -----



"Bill Wilson"

<bill.f.wilson@gmail.com>

10/31/2011 02:15 PM

To <bill.wycko@sfgov.org>

cc

Subject Natural Area Plan Comments

- 01 { - The Natural Areas Plan goals are excellent.
- 02 { - The SNRAMP DEIR, with notable exceptions, does an excellent job analyzing the environmental impacts of the Natural Areas Plan.
- 03 { -The plan is NOT radical. In fact, the Proposed Project neglects to 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, which designation perpetuates a fragmented approach to natural resources management.
- 04 { - For the purposes of the SNRAMP DEIR, recreation should include community stewardship. This would change the balance of purported recreational impacts.
- 05 { - That the recreation and maintenance alternatives are the "**environmentally superior alternatives**" and neither the *restoration* nor the proposed project are, is, apparently, an unfortunate paradox of CEQA, where biodiversity is considered no more important than aesthetics or recreation within the *human* environment.
- 06 { - The true **impacts (and benefits!) of the maximum restoration alternative cannot be properly evaluated** against the proposed project, since the description is only two pages long. Thus, no such definitive conclusions about recreation impacts or biological benefits can be made because there is no substance to the alternative. It is totally general.
- 06 { - **SEPARATE out SHARP PARK from the Natural Areas Plan!**

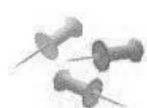
Bill Wilson

215 Edna Street

San Francisco, CA 94112



Winqvist-1

**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 04:18 PM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc:

bcc:

Subject: Fw: Comments re: the NAP EIR

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 04:18 PM —

**Kelly Winqvist**

&lt;kwinqvist@yahoo.com&gt;

10/31/2011 01:27 PM

Please respond to  
Kelly Winqvist  
<kwinqvist@yahoo.com>

To: "bill.wycko@sfgov.org" &lt;bill.wycko@sfgov.org&gt;

cc:

Subject: Comments re: the NAP EIR

Dear Mr. Wycko,

01

I am writing to comment on the NAP EIR. While I recognize the importance of native plants to the Bay Area, the NAP EIR is inadequate and additional work must be done. I frequently walk in Buena Vista and Bernal Hill parks with my dog, both of which I've visited for the past 8 years, and this plan will adversely affect the public's access to those areas, among many others.

02

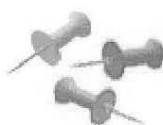
An EIR needs to be based on solid scientific evidence. However, the NAP EIR repeatedly states that dogs may be impacting plants or wildlife without offering evidence of any impacts, past or present. It also ignores scientific studies that show off leash dogs to have little impact on plants and wildlife.

Additionally, the analysis of the effects of the proposed closures of up to 80% of the Dog Play Areas in the city is not adequate. Specifically, the impacts on other parks, DPAs, and the effects of transportation required to the remaining DPAs on the environment have not been considered. It also does not consider the impact the DPA closure would have on the physical and mental health benefits of people who walk with their dogs or on the social communities that exist within and around the parks.

Kelly Winqvist

San Francisco home owner/member of the Nature Conservancy

Woo-1



**Bill Wycko/CTYPLN/SFGOV**

10/31/2011 09:25 AM

To Jessica Range/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: Oppose GGNRA Draft Dog Management Plan

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 10/31/2011 09:25 AM -----



**Giny Woo**  
<ginylee1@yahoo.com>

10/29/2011 05:29 PM

Please respond to  
Giny Woo  
<ginylee1@yahoo.com>

To "Bill.wycko@sfgov.org" <Bill.wycko@sfgov.org>

cc

Subject Oppose GGNRA Draft Dog Management Plan

Mr. Bill Wycko,

I writing to express my opposition to the GGNRA Draft Dog Management Plan.

We need place to take our dogs for off leash dog walk. It's vital for our health and our dogs health. Most of the parks - city, state, federal - are either on leash only or does not allow dogs at all. Off leash area is so limited and few. We need these spaces. Please do not take away these spaces but instead expand it. There are 4 millions perfectly adoptabled pets being killed in shelters each year. We need to encourage caring people to adopt these pets and we need to give them a place for them to enjoy time with their dogs off leash. Imagine having to live on leash all your life. You wouldn't want that for yourself. Why make our dogs? Please please leave our off leash areas alone.

Thank you!!!

Giny woo

01

Yip-1

**Bock, John**

---

**From:** Jessica.Range@sfgov.org  
**Sent:** Tuesday, November 01, 2011 3:47 PM  
**To:** Bock, John  
**Subject:** Fw: Comment on 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](http://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 03:21 PM  
cc  
Subject  
Fw: Comment on NAP EIR

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 11/01/2011 03:22 PM -----

Yunny Yip  
<yunnyyip@yahoo.com>  
To  
"bill.wycko@sfgov.org"  
10/31/2011 10:37 PM  
<bill.wycko@sfgov.org>  
cc  
Subject  
Please respond to Yunny Yip  
<yunnyyip@yahoo.com>  
Comment on NAP EIR

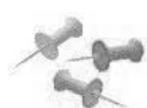
Yip-1

Thank you for taking the time to note my comments:

- 01 { 1) 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.
- 02 { 2) 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).
- 03 { 3) 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.
- 04 { 4) 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 { 5) Support the Maintenance Alternative and the Maximum Recreation Alternative. The NAP EIR identifies them as "environmentally superior."

TY Yip  
San Francisco  
CA 94102

Zeiger-1

**Bill Wycko/CTYPLN/SFGOV**

06/11/2012 02:52 PM

To: Jessica Range/CTYPLN/SFGOV@SFGOV

cc:

bcc:

Subject: Fw: Public Comment on the Natural Areas Program - DEIR

— Forwarded by Bill Wycko/CTYPLN/SFGOV on 06/11/2012 02:52 PM —

**Felicia <feliciazen@aol.com>**

06/11/2012 02:13 PM

To: Bill.Wycko@sfgov.org

cc:

Subject: Public Comment on the Natural Areas Program - DEIR

Public Comment on the Natural Areas Program:

01

There are many problems with the Natural Areas Program. I don't have the time or capacity to enumerate all of them in my following brief comment. However, the SF Forest Alliance has done a monumental job of research to accomplish that feat. Hopefully their careful and incisive research will be given the close attention it justly deserves.

The nap agenda wrongly advocates a concept that puts *plants before people*. Several surveys have been taken regarding what park visitors want from their parks. Not one person asked to please cut down thousands of trees and replace them with native plants and grasslands - sand dunes and dune scrub. Nor did anyone ask for a replication of the landscape from a few hundred years past. Not one! Yet this is the nap ideology and plan for our urban city parks.

The surveys which have been taken over the years and their results are on record. Park visitors want trails to walk and jog on. They want clean and safe parks to relax in. They want clean and accessible bathrooms. They want safe and clean playgrounds for their children. They want a variety of recreational opportunities and open recreation centers with someone in charge to manage them.

However millions of tax dollars are given over to nap while park visitor wants and needs are on hold due to the ongoing budget shortfall. Nonetheless, park users and the public will be paying for what they didn't ask for. It's as if the public's preferences be damned - the nap will prevail - like it or not. Makes no sense to me.

Zeiger-1

There's been no attempt to inform the public at large about nap though it's been in the works for 15 years. One might ask what is nap afraid of? I've chatted randomly with over a hundred visitors at the park I go to daily - Stern Grove. The people I've talked to give a blank look when asked: do you know about the natural areas program? And these are the frequent park users! The few people I've run across at the park who do know about nap - oppose it.

02

How does the nap plan translate into the reality of our urban parks? In my neighborhood park, not so well. At the western tip of Pine Lake, 25 trees were cut down in 2004. These trees served as a windbreak from the prevailing western winds for thousands of the other park trees for approximately a hundred years. Though it's denied by the chairwoman of nap that the windbreak trees were destroyed so that native's could be planted in their place - natives *were* planted in their place. In a very short time the native's all died and the windbreak trees are gone forever. The nap chairwoman claims all those 25 trees were hazardous and taking them down had nothing to do with wanting an unshaded space for planting native's. However it challenges plausibility that on a narrow hillside not more than about 100 feet wide that every single one of those 25 trees were in a hazardous condition. They were not judged all hazardous in 2003 when the Hort Science Arborists' examined and graded every tree in the park. It's been my experience that misleading responses from nap is not an unusual occurrence.

I've been walking in Stern Grove/Pine Lake park since 1970 when I got my first dog. So I can vouch for the fact that more trees have fallen onto public paths since the taking down of the windbreak trees than had happened in the past 42 years. In fact a death by falling tree limb did occur in 2008. Whether or not the removal of those trees played a part in that tragedy can't be known for certain. However it is certain that park visitor's life and limb have been more at risk since the irresponsible destruction of all those windbreak trees.

Lopping off branches in Glen Park and using toxic herbicides have been carried out illegally by nap during this critical nesting season. Why? Because a grant would have run out otherwise. Money over ethics! Not surprising. A much less significant but revealing unsavory tactic has been to continually rip posters from the Stern Grove bulletin board if they aren't favorable to nap. Posting a rebuttal would show some integrity and openness to other viewpoints but that's not how nap conducts itself. As a result, reliance on ethical conduct regarding nap's pursuits in our parks is questionable and suggests a harmful risk potential to our parks and environment.

Zeiger-1

01  
(Cont.) { Nap needs to be scaled back substantially mainly because it's failed to accept that urban parks represent a respite from city life and the opportunity for recreational uses first and as a very distant second, a museum for native plants. I see no justification for nap's self-anointed permission to exert control over how park visitors may use and enjoy their parks - imposing fences and signage.

The West of Twin Peaks Council, a coalition of 20 neighborhood associations, upon hearing what nap was about and what it's up to voted unanimously to eliminate nap altogether. Nap's plan has been noted scientifically not to be ecologically sound in very many of its conclusions. For example, that grasslands absorb as much carbon as trees. Shouldn't these instances give reasonable pause to decision makers regarding nap's final certification as it exists in its present state? It's my opinion that nap needs to be carefully scrutinized for its ecological authenticity before going forward considering the potential impactful consequences of its extreme ideology.

Must the public be forced to fund a program they very likely would not want once they learned what it entailed or afterward when it would already be too late to find that so many of the trees they cherished were gone and find themselves very much constrained by nap's bias for *plants before people* ?

Felicia Zeiger

District 4 Rep: Park, Recreation Open Space Advisory Committee.

Note: I speak for myself not for prosac

Zendarski-1

**Bock, John**

---

**From:** Jessica.Range@sfgov.org  
**Sent:** Tuesday, November 01, 2011 3:48 PM  
**To:** Bock, John  
**Subject:** Fw: Please Preserve Off-Leash Access in City Parks!

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](http://www.sfplanning.org)

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

Bill  
Wycko/CTYPLN/SFGO  
V  
To  
Jessica Range/CTYPLN/SFGOV@SFGOV  
11/01/2011 03:25  
PM  
cc  
Subject  
Fw: Please Preserve Off-Leash  
Access in City Parks!

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

"Art Zendarski"  
<art@zendarski.com>  
To  
<[bill.wycko@sfgov.org](mailto:bill.wycko@sfgov.org)>  
10/31/2011 06:09  
PM  
cc  
Subject  
Please Preserve Off-Leash Access in  
City Parks!



Zendarski-1

Mr. Wycko,

One of the great pleasures of living in San Francisco is walking in some of the most beautiful parks in the country with my four-legged companion.

Crissy Field is the most frequented park we enjoy and hope to continue to enjoy with your help.

Please realize that dog walking is a wonderful form of exercise both physically and mentally. This is true for both me and Winston. As I would never propose closing parks to people due to the small percentage of people who vandalize and litter, let's not close the parks to off-leash due to a small percentage of irresponsible dog owners. The majority of dog owners are good stewards of the parks of San Francisco and are responsible, caring people.

I think it is interesting to hear arguments of how dogs have a negative impact on the parks when the facts listed in their own reports prove otherwise. The beauty of urban parks are the diversification of activities that take place nearly every day.

Please do not be swayed by the small minority of narrow minded individuals who do not understand the true pleasures of urban living!

Thanks you,  
Art Zendarski



**Attachment C     Draft EIR Public Hearing Transcript**

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PH

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REPORTER'S TRANSCRIPT OF THE  
SAN FRANCISCO PLANNING COMMISSION MEETING  
Agenda Item No. 13

---oOo---

Significant Natural Resources Area Management Plan  
Hearing on the Draft Environmental Impact Report  
Case No. 2005.1912E

---oOo---

San Francisco, California  
October 6, 2011

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REPORTER: LAURA AXELSEN, CSR 6173  
FILE NO.: A508EA7

PH

1 THE CLERK: We are now on Item 13 for Case  
2 No. 2005.1912E, Significant Natural Resources Area  
3 Management Plan, public hearing on the draft environmental  
4 impact report.

5 Please note that written comments will be  
6 accepted at the planning department's office until the  
7 close of business of October 17th, 2011.

8 MS. RANGE: Good afternoon, President Olague,  
9 members of the commission. I am Jessica Range with the  
10 Environmental Planning Division of the Planning  
11 Department.

12 This is a hearing to receive public comments on  
13 the draft environmental impact report for Case No.  
14 2005.1912E, the Significant Natural Resources Area  
15 Management Plan.

16 The Recreation and Parks Department developed  
17 the natural areas program to protect and manage the  
18 remaining natural areas owned by the City. There are 32  
19 designated natural areas, 31 in San Francisco and one,  
20 Sharp Park, is located in Pacifica.

21 The management plan identifies management  
22 actions within each of these natural areas and is intended  
23 to guide resource protection, habitat restoration, and  
24 trail and access improvements, other capital projects, and  
25 maintenance activities over the next 20 years. The EIR

PH

1 also addresses the impacts of the routine maintenance and  
2 the Sharp Park restoration project at the project level.

3 Routine maintenance activities are similar to  
4 the current scale and scope of the Natural Areas Program  
5 and would not change substantially with implementation of  
6 the management plan. Project level details have been  
7 developed for the Sharp Park restoration project, enabling  
8 this aspect of the management plan to be addressed at the  
9 project level.

10 The purpose of the Sharp Park restoration  
11 project is to enhance the habitat for the California  
12 red-legged frog and the San Francisco garter snake. The  
13 main components of the Sharp Park restoration project  
14 includes dredging and re-contouring of the Laguna Salada  
15 wetland complex, creating an upland and wetland habit in  
16 and around the lagoon, and creating a habit corridor  
17 between Laguna Salada and Horse Stable pond.

18 The project evaluated in the EIR is the project  
19 proposed by Rec and Park. As part of the environmental  
20 review under CEQA, we are required to analyze alternatives  
21 to the project. These alternatives are not Rec and Park  
22 proposals for management of the natural areas.

23 Staff is not here to answer comments today.  
24 Comments will be transcribed and responded to in writing  
25 in a comments and responses document, which will respond

Page 3

PH

1 to all verbal and written comments received and make  
2 revisions to the draft EIR as appropriate.

3 I would, however, like to note one correction  
4 that will be made in the comments and responses document,  
5 which may clarify some comments received today. Page 2 of  
6 the summary erroneously identifies the environmentally  
7 superior alternative as the maximum restoration  
8 alternative.

9 A comprehensive analysis of the environmentally  
10 superior alternative is provided on draft EIR pages 525  
11 through 526 and determines that the maintenance  
12 alternative is the environmentally superior alternative.  
13 Page 2 of the summary chapter will be corrected in the  
14 comments and responses document.

15 This is not a hearing to consider approval or  
16 disapproval of the project. That hearing will follow the  
17 final EIR certification. Comments today should be  
18 directed at the adequacy and accuracy of the  
19 information -- of the information contained in the draft  
20 EIR.

21 Commenters should speak slowly and clearly so  
22 that the court reporter can produce an accurate  
23 transcript. Also, commenters should state their name and  
24 address so that they can be properly identified and so  
25 that they can be sent a copy of the comments and responses

Page 4



PH

1 when completed.

2 After hearing comments from the general public,  
3 we will also take any comments on the draft EIR by the  
4 Planning Commission. The public comment period for this  
5 project began on August 31st and it extends until  
6 5:00 p.m. on Monday, August -- October 17th.

7 This concludes my presentation on this matter,  
8 and unless the commission members have any questions, I  
9 would respectfully suggest that the public hearing be  
10 opened. Thank you.

11 PRESIDENT OLAGUE: Great. I do want to extend  
12 the comment period until the end of October, so by a  
13 couple of weeks at least. Okay. And we can discuss it if  
14 we both want to extend it beyond that, you know, later on.

15 We have a few speaker cards, Sarah Ballard  
16 followed by Sally Stephens.

PH-Ballard

17 MS. BALLARD: Good afternoon, Commissioners,  
18 Director Rahaim. I'm Sarah Ballard from the Recreation  
19 and Parks Department, and I just briefly wanted to put  
20 this plan in a little bit of context for you.

21 As you may know, we own about 14 percent of the  
22 land in San Francisco, about 4,000 acres, and of that,  
23 about a thousand acres are what we refer to as natural  
24 areas. As Jessica said, they're made up of 32 distinct  
25 areas, including Bernal Hill, Twin Peaks, Sharp Park.

PH

1           The plan -- the Natural Areas Management Plan  
2           was established through a decades-long process. It was  
3           published in 2006, and about ten years of expert research  
4           and community process went into creating the plan. Uhm,  
5           and as Jessica spoke to, it really creates a road map for  
6           us as the department for how to manage our sensitive  
7           natural habit, including some threatened and endangered  
8           species, directs us how to prioritize our scarce resources  
9           and our volunteer time.

10           Our job as the Recreation and Parks Department  
11           is to balance a variety of needs, and sometimes those  
12           needs are competing. And we feel that this management  
13           plan does that through a very carefully crafted process.  
14           As you know, what's before you today is the draft EIR, and  
15           we look forward to continuing to receive public feedback  
16           on that, to hear your feedback, uhm, and continue working  
17           with your staff. They've been really exceptional through  
18           this process.

19           Uhm, I just did want to point out that, uhm, to  
20           echo what Jessica said about the alternatives, we -- as  
21           you know, there are -- we are required under CEQA to study  
22           a variety of alternatives, but the project and the plan  
23           for us has not changed. And I think there's been some  
24           confusion around that, particularly as it pertains to the  
25           dog play areas, and just wanted to clarify that for you.

PH

1 Thank you very much.

2 PRESIDENT OLAGUE: Thank you. Renee Pittin, Bo  
3 Links, Linda Shaffer.

PH-Stephens

4 MS. STEPHENS: Yeah. Hi, my name is Sally  
5 Stephens, and I'm the chair of the San Francisco Dog  
6 Owners Group. Urban parks are for people. They're our  
7 collective back yards, the places where we go to play with  
8 our kids and our dogs and simply sit in the sun.

9 We have so little open space in San Francisco,  
10 we cannot afford to lock a third of it away in plant  
11 museums where you can look but not enter, which is what  
12 the project and the maximum restoration alternatives would  
13 do.

01

14 We obviously support the maintenance or maximum  
15 recreational alternatives because they protect existing  
16 natural areas yet preserve access for people. The EIR  
17 incorrectly states the number and total acreage of all  
18 placed dog play areas, or DPA's. There are actually 29,  
19 which cover about 120 acres total, but 80 percent of that  
20 total is located either within or adjacent to a natural  
21 area and is therefore at risk of future closure if NAP  
22 claims impacts from the dogs.

02

23 Many were designated as DPA's years before the  
24 N -- the NAP came around, yet with a simple stroke of a  
25 planner's or a NAP staffer's pen, they can be gone. If

PH

1 you're going to force people out of the parks, you better  
2 have a good reason.

03

3 The NAP EIR reportedly -- repeatedly says dogs  
4 may have an impact, but there's no evidence cited in the  
5 EIR that dogs are now or ever have done so. EIR's must be  
6 based on documented impacts, not hypothetical conjectures.  
7 Specific proof of impacts, not just claims of observations  
8 with no details given, must be added to the EIR.

04

9 Give us unbiased proven facts or don't kick us  
10 out. NAP has become a way to get rid of DPA's and city  
11 parks since the only real remedy from the alleged impacts  
12 from dogs is closure of the DPA. As such, the EIR must  
13 consider the impact of those closures on the human and  
14 urban environments, not the just the natural environment.

05

15 Throughout the EIR, dogs are described solely as  
16 nuisances. The EIR does not consider any benefits of dogs  
17 and off-leash dog walking to people and communities. The  
18 NAP EIR must consider impacts of a physical and emotional  
19 health of people who can no longer walk their dogs in  
20 closed DPA's, and on the sense of neighborhood and park  
21 community that will be impacted if DPA's are closed or  
22 significantly reduced. Yet it does not.

06

23 This is particularly important with the maximum  
24 restoration alternative that will essentially close DPA's  
25 at McClaren, Bernal Hill, Buena Vista, and Lake Merced.

PH

1 These DPA's constitute roughly 75 percent of the total  
 2 legal off-leash area in the city parks. The EIR does not  
 3 adequately analyze the impact of that local closure on the  
 4 remaining DPA's and other nearby parks, especially when  
 5 combined with the Golden Gate National Recreation Area's  
 6 plan to close 90 percent of its off-leash space. The dogs  
 7 and dog people aren't going to go away or be quietly  
 8 forced out of our parks. Thank you. Copies of what I  
 9 said.

PH-Links

10 MR. LINKS: Good afternoon. My name is Bo  
 11 Links. I'm a lifelong San Francisco resident, and as I'm  
 12 sure you can imagine with a last name like mine, I'm a  
 13 very passionate golfer.

14 I've been playing Sharp Park golf course for 45  
 15 years now, and I've also served for a number of years as a  
 16 volunteer golf historian for the City and County of San  
 17 Francisco, and what I wanted to convey to you -- and I've  
 18 submitted some written comments as well, and my friend and  
 19 colleague Richard Harris I think with will speak later on  
 20 behalf of the San Francisco Public Golf Alliance, which we  
 21 co-founded -- but I wanted to add some historical words  
 22 and specifically to say the staff got it a hundred percent  
 23 correct in the draft EIR designating this precious golf  
 24 course as an historic resource.

01

25 This is the legacy of John McLaren. It was his

PH

01  
(Cont.)

1 vision, and he brought in one of the greatest architects  
2 in the history of the world, Alister MacKenzie, to create  
3 this very special asset for the City and County of San  
4 Francisco even though it's on property in Pacifica.

5 This is clearly the work of a master. It's the  
6 equivalent of a Rembrandt that would hang in a museum, and  
7 the fact that it's old and maybe a little faded doesn't  
8 take away its luster. People come from all over the world  
9 to walk it, to play it, to see it, to admire it, to know  
10 it, to understand it. It's a symbol of golf's golden age.  
11 It's part of our historic legacy just the way Sharp -- the  
12 way Coit Tower is, the way the cable cars are.

02

13 And the habitat restoration that's in the works  
14 in the subject of this EIR is by no means incompatible  
15 with maintaining that golf course. The species in  
16 question are fresh water species. This product -- this  
17 property, excuse me, was a salt marsh before MacKenzie  
18 transformed it into the oasis it is today. It's going to  
19 celebrate its 80th anniversary next year, and the process  
20 that's under way in this draft EIR should continue without  
21 interruption so the city can move forward to do what's  
22 needed to do, and that is to implement a very responsible  
23 habitat restoration protocol.

24 The frogs are thriving down there. This is one  
25 of the biggest birth years in recent memory, and that

PH

1 evidence is on the record, and what the city plans to do,  
 2 we support. It's consistent with maintaining this  
 3 property in a way that serves a variety of interests, and  
 4 I want to thank you for giving me the opportunity to speak  
 5 to you, and you consider in addition to written comments  
 6 that have been submitted. Thank you so much.

PH-Pittin

7 MS. PITTIN: Good afternoon, Commissioners. My  
 8 name is Renee Pittin. The Hippocratic Oath says first do  
 9 no harm. This seems to be a good approach for any person  
 10 and certainly for government.

01

11 I don't think that this applies to the National  
 12 Areas Program. As a senior, whose primary -- okay, whose  
 13 only exercise is walking with my dog, I feel that the  
 14 increased removal of our shared open space is -- by the  
 15 Natural Areas Program, which is a single purpose and  
 16 exclusionary program, will drive more and more local  
 17 residents into increasingly smaller areas for exercise,  
 18 access, and enjoyment of our San Francisco landscape.

19 I live near Glen Canyon, and too many times I  
 20 have not been able to walk there because the Natural Areas  
 21 Program was engaging in yet another round of toxic  
 22 warfare, laying waste to new generations of hapless and  
 23 helpless flora and fauna and exposing the local  
 24 neighborhood and everyone moving through the area to these  
 25 poisons.

PH

01  
(Cont.)

1 I oppose this unfettered increase of the Natural  
 2 Areas Program into more and more of San Francisco's  
 3 parkland and open space, and I ask that you all, as  
 4 members of the planning commission, recognize that this  
 5 program removes shared space from the community on the  
 6 basis of sharply and scientifically contested assumptions  
 7 about what is native or natural and makes equally  
 8 unfounded assumptions about what actions, such as walking  
 9 with one's pooch, can or cannot occur in our shared and  
 10 all-too-limited San Francisco open spaces.

11 Please oppose any expansion of this program.  
 12 Thank you.

PH-Shaffer

13 MS. SHAFFER: Good afternoon, Commissioners. My  
 14 name is Linda Shaffer. That's spelled S-h-a-f-f-e-r. I  
 15 am currently the vice-president of the local chapter of  
 16 the California Native Plant Society, and I would like to  
 17 thank you for this opportunity to address you. Uhm, I  
 18 have three points that I would like to try to make in this  
 19 limited time.

20 The first one is, uhm, that I have -- I have to  
 21 admit I was very curious to see what an environmental  
 22 impact analysis would look like, given that it's of a  
 23 program that is environmental in nature, and I have to say  
 24 in the time that I've had to read it so far, I've been  
 25 very impressed. It's -- I think that those involved have



PH

1       done a good job, a wonderful job, particularly with  
2       respect to the 31 natural areas that are located in the  
3       City of San Francisco. So I would like to commend those  
4       involved.

5               I would also like to add that the Native Plant  
6       Society is in the process of having people who have  
7       volunteered in a lot of these natural areas for many years  
8       read over the sections that pertain specifically to the  
9       projects proposed for those natural areas and make sure  
10      that, uhm, based on their knowledge of the area that the  
11      report is both accurate and complete.

12             And I'm delighted to hear that there will be an  
13      extension to the public comment period because it's been  
14      very difficult. The same group of people that's been  
15      involved in commenting on this has also been involved in  
16      commenting on the recreation/open space element, and the  
17      first 30 days of this comment period overlapped with the  
18      last 30 days of that. So it's been kind of crazy. So  
19      thank you for that. The other -- that was actually the  
20      second point that I wanted to make.

21             The third point that I would like to make is  
22      that I'm still in the process of reading this. The  
23      complexity in this document has to do with the issue at  
24      Sharp Park. You can already tell that this is a  
25      controversial issue -- issue, a controversial program.

PH

1 Uhm, I have so far identified one factual error in the  
2 portion of the document that deals with Sharp Park.

3 I will be submitting comments in writing, but I  
4 don't have them finished yet, and I would like to add,  
5 please, I do not want to receive a copy of the comments  
6 and responses, so I'd like to get that -- I had that  
7 happen to me once when I wasn't expecting it, so no thank  
8 you. That was just fine.

9 Thank you very much for your attention.

10 PRESIDENT OLAGUE: Thank you. Tenzin Sherap,  
11 George Mozingo, Patrick Skain, followed by Clarence  
12 Bryant.

PN-Sherap

13 MR. SHERAP: My name is Tenzin Sherap, and my --  
14 my address is General Delivery, San Francisco, 94142. I  
15 would like -- I know that there's been comments about the  
16 golf course as being -- whether or not the golf course is  
17 going to be preserved, and I would like to say that I'm  
18 speaking highly in favor of the golf course being  
19 preserved.

01

20 It seems as though Mr. Antonini and -- or maybe  
21 the rest of this board has been mercilessly okaying  
22 practically any request that has to do with children's --  
23 such as in our beautiful Dolores Park that is being  
24 defaced for this child's park. And it's very important  
25 that a place like this golf course, which is for teenagers

PH

1 and for elderly and older people to get exercise and enjoy  
 2 the environment, that this be maintained for San Francisco  
 3 residents. Thank you very much.

4 PRESIDENT OLAGUE: Thank you. If I did call  
 5 your name, if you can just keep coming up to the mic.

PH-Mozingo

6 MR. MOZINGO: Good morning, my name is -- or  
 7 good afternoon, rather. My name is George Mozingo. I'm a  
 8 resident of the City and County of San Francisco, and I'm  
 9 an employee of the County of San Mateo.

01

10 Our counties have worked collaboratively and  
 11 cooperatively to come up with a plan that really does  
 12 address the issues of habitat preservation and to protect  
 13 those species that are enumerated in the article -- in the  
 14 draft EIR, specifically frogs, the red-legged rana aurora  
 15 draytonii, the garter snake, and others. Those are, in  
 16 fact, as Mr. Links previously stated, fresh water species.  
 17 That original geography was called in the colonial period,  
 18 Laguna Salada, which I believe to be meaning a still body  
 19 of water that is salty.

02

20 Now, those frogs do not exist in those  
 21 environments, so this is, in fact, a construction. It is  
 22 a historical construction by a -- one of the great  
 23 architects of golf courses ever. It is also a -- of  
 24 cultural value. If you were to go there on any day, you  
 25 would find old people and young people and students and

PH

1 every -- people from every group and nation playing on as  
2 groups, as -- and as individuals. It is also affordable  
3 relative to other golf courses in the area.

4 In the county, we don't have a lot of  
5 inexpensive golf courses. Here in the city and county we  
6 have even fewer. This is an opportunity for people of  
7 limited income to play in a golf course that is stunningly  
8 beautiful and can be restored.

9 Uhm, it is also -- uhm, this plan will protect  
10 those species that are enumerated. Without it, it will,  
11 again, become a rather dry and difficult place for those  
12 species to exist. Particularly in the plan, the creating  
13 of the contours for the snakes to exist where they can go  
14 down and feed on the frogs I thought was just nothing  
15 short of engineering brilliance on the part of the two  
16 park -- park groups.

17 And finally, it is a recreational. Even those  
18 like myself who don't golf, it is a wonderful place to go  
19 walk. Thank you.

20 PRESIDENT OLAGUE: Again, I'd like to ask those  
21 who are standing in front of the door to either find a  
22 seat or move to this other side since it is creating a  
23 fire hazard, just those standing in front of the door.  
24 Have to clear the doorways.

25 So if you've heard your name called, please come

PH

PH-Skain

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02

1 up to the mic. Greg Gaar, Paul Rotter, and Neff Rotter --  
2 Roter?

3 MR. SKAIN: Good afternoon, Commissioners. My  
4 name is Pat Skain. I was a member of the Citizens  
5 Advisory Committee for the Natural Areas Program. And I  
6 see this draft environmental impact report as a  
7 continuance of those efforts in past years. We need to  
8 move ahead with these -- this study itself in the defined,  
9 and give Park and Rec staff wherewithal to actually begin  
10 to improve our recreational facilities and our natural  
11 areas in San Francisco.

12 I do want to -- specifically to comment on the  
13 great work that staff did in preparing this and work done  
14 by all the consultants on it. We're never going to be  
15 100 percent happy. There are some elements in the city  
16 that want to occupy everything. There are activities that  
17 simply have significant impacts on every area of our  
18 recreation facilities.

19 We've seen in the last year exponential growth  
20 in requests for soccer fields and whatnot, so it's not  
21 just any one group, but these are simply 32 areas. It was  
22 even culled down in terms of 32 areas. And the management  
23 of those 32 areas have been looked into significantly by  
24 the staff, the individuals working on this report.

25 I think it's very important to move this

PH

1 environmental impact report forward. It's a 20-year  
 2 project. I'm sure it will be tweaked in the course of the  
 3 next 20 years, but it's important to give staff and the  
 4 citizens an opportunity to see what San Francisco can be  
 5 and how good our recreational facilities can become. I  
 6 want to thank you all.

PH-Bryant

7 MR. BRYANT: Good afternoon, Commissioners. My  
 8 name is Clarence Bryant. I am a resident of San Francisco  
 9 and a product of its streets, its environment. I'm also a  
 10 golfer, and I would like to read into -- I'm not sure what  
 11 the protocol is for this hearing, but I would like to read  
 12 into the record a copy of a letter that the Bay Area Golf  
 13 Association has submitted to Congressman Speier, Mayor Ed  
 14 Lee, Board of Supervisors of both San Francisco and San  
 15 Mateo.

16 And, to wit, it says, Dear Congressman Speier,  
 17 Sharp Park is well known as the people's golf course,  
 18 public course, where racial minorities, retired seniors,  
 19 school children, working men and women, and in these days  
 20 even unemployed can play golf.

21 Because of its modest fees, all these groups  
 22 play golf in large numbers in Sharp Park. The Bay Area  
 23 Golf Club represents such golfers. We are a mostly  
 24 African-American club formed in 1954 and based in San  
 25 Francisco.

PH

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1           We are a founding member of the Western States  
2           Golf Association, one of America's oldest African-American  
3           golf associations. We were the host club for the Western  
4           States Inaugural Championship Tournament in 1955, where  
5           the founding members of the clubs met and played golf  
6           together for the first time. The tournament was held at  
7           Sharp Park.

8           It is significant that Sharp Park was built by  
9           history's greatest golf architect, Alister MacKenzie.  
10          Most of MacKenzie's courses include the most famous ones,  
11          like Augusta National, the site of the annual Master's  
12          Tournament, and Cypress Point. These are private and  
13          inaccessible to common people. Sharp Park is part of San  
14          Francisco's legatorian tradition of providing great  
15          classical architecture for its public places. This is the  
16          spirit of San Francisco.

17          Is that my dong?

18          PRESIDENT OLAGUE: There's a second one, but you  
19          have about 30 seconds, but you can certainly submit the  
20          letter.

21          MR. BRYANT: I'd like to submit this into the  
22          record if possible.

23          PRESIDENT OLAGUE: Into the record, yeah,  
24          definitely.

25          MR. BRYANT: Okay. Thank you very much for your

PH

1 time.

2 PRESIDENT OLAGUE: Thank you, sir. If I've  
3 called your name, please feel free to come to the mic, and  
4 Peter Brastow is the last card I have, and I know I did  
5 call a few other names, so please feel free to come up.

PH-Rotter-P

6 MR. ROTTER: Commissioners, my name is Paul  
7 Rotter. I'm a resident of San Francisco. This program is  
8 offering the city a major expansion of NAP programs into  
9 the MA3 -- maintenance area 3. And in support of that,  
10 the statement on page 2 says that the EIR considers the  
11 maximum restoration alternative as the environmentally  
12 superior.

13 However, if you wade yourself -- wade through it  
14 back to page 525, the EIR says, the maximum recreation and  
15 maintenance alternatives are the environmentally superior  
16 alternatives, and it ends the statement that the  
17 maintenance alternative, on the other hand, would preserve  
18 the existing distribution extent of biological resources,  
19 including sensitive habitats.

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20 For these reasons the maintenance alternative is  
21 environmentally superior alternative. That's not what's  
22 being proposed by this EIR. The EIR is proposing that you  
23 adopt a program that is environmentally least good.

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24 Second thing about that is that this proposal is  
25 a violation of CEQA. CEQA says that public agencies



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(Cont.)

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1 should not approve projects proposed if there are feasible  
 2 alternatives or feasible mitigation measures available.  
 3 There are -- from what they propose is the maintenance  
 4 intervention of into the environment.

5 There are alternatives, and it says so in this  
 6 EIR. This EIR is not a good one. This is a bad policy  
 7 for the city. NAP largely is also a bad policy for the  
 8 city with their environmental destruction, use of toxic  
 9 sprays.

10 I walk on Twin Peaks almost every weekday  
 11 morning, and on there I run into the department doing  
 12 spraying of pesticides when they should be -- the members  
 13 doing that should be wearing respirators. Things like  
 14 that when I point out to them they say that's none of your  
 15 business.

16 So it's important that you realize that this EIR  
 17 is not the direction that you should be going. We should  
 18 be going into a more environmentally protected type of  
 19 alternative, and that is maximum maintenance of the  
 20 existing environment.

21 The environment also decides the use of toxics.  
 22 The destruction of the number of trees is a gross  
 23 violation. San Francisco has barely one tree per citizen  
 24 in this city, and this proposes to turn down a large  
 25 percentage of that. It shouldn't be done. Thank you very

PH

1 much.

2 PRESIDENT OLAGUE: Any additional public comment  
3 on this item?

PH-Rotter-N

01

4 MS. ROTTER: Hi, I'm Neff Rotter, and I agree  
5 with my husband that the maintenance alternative would be  
6 the very best way for San Francisco to go.

PH-Bowman

01

7 MS. BOWMAN: Hello. I'm Arnita Bowman, and I'm  
8 a user of these parks, and I really feel that recreational  
9 funding and open space for people is being hijacked by  
10 this plan. San Francisco has already taken extreme  
11 position of excluding all people from the San Francisco  
12 watershed. The 26,000 acres there is surrounded by a  
13 seven foot chain link fence, and this plan ignores that  
14 this has been already allocated to natural areas.

15 The San Francisco park sites are only ten  
16 percent or tenth of the size of that single refuge, and  
17 this extreme plan takes 40 percent of that little space  
18 for more native plant projects. For me, the gardening  
19 projects will provide little benefit and will destroy the  
20 new ecosystems that have been developed over the past 400  
21 years and will destroy this treasured San Francisco  
22 landscape that is part of our diverse culture, history,  
23 and future.

24 This costly plan is not even the environmentally  
25 superior plan that's been mentioned and does not

PH

02

1 necessarily improve the beauty of the parks or quality of  
 2 the life for residents. In addition, introducing new or  
 3 expanding endangered species habitats will permanently  
 4 hijack our small but precious recreational areas.

5 For example, the historic Sharp Park  
 6 recreational area is under attack even though man made the  
 7 fresh water habit that wasn't previously there, and  
 8 neither the endangered snake nor the endangered frog could  
 9 live there if the saltwater habitat was restored.

02  
(Cont.)

10 This plan doesn't take into consideration these  
 11 future impacts on people or recreation. People with dogs  
 12 are only allocated freedom in three percent of the city  
 13 park areas, and the hoarding plan treats us like an  
 14 invasive nuisance and takes away an additional 20 percent,  
 15 and the monitoring plan will probably eliminate the rest.  
 16 I resent being treated like an invasive part of the  
 17 community in our treasured city parks.

18 Please support the -- either the recreational  
 19 plan or the maintenance plan so that we won't wake up from  
 20 the nightmare of NAP to an ugly and uninviting open space.  
 21 Thank you very much.

22 PRESIDENT OLAGUE: Thank you.

PH-Gaar

23 MR. GAAR: Good afternoon, Commissioners. My  
 24 Name's Greg Gaar. I've lived in San Francisco all my  
 25 life, and I've volunteered with the Natural Areas Program

PH

1 and the National Park Service doing habitat restoration.  
2 I also started a San Francisco native plant nursery in  
3 Golden Gate Park because I want to propagate San Francisco  
4 native plants that can be used for habitat restoration  
5 throughout the city and would help complement the Natural  
6 Areas Program.

7 I already sent my written comments in to the  
8 environmental review officer. So that will be on the  
9 record. But some of the criticisms I have of the draft  
10 EIR is although I support the plan, the Natural Areas  
11 Management plan, there are a few little flaws that I would  
12 like to tweak in the -- the draft EIR.

01

13 Number one, what is recreation? Well,  
14 recreation in the draft EIR is predominantly traditional  
15 recreation: Bicycle riding, hiking, dog walking, et  
16 cetera. But for a lot of us who are naturalists, we do a  
17 lot of vigorous habitat restoration, which is real hard,  
18 physical labor, controlling the weeds from over-running  
19 the native plant communities, and that is very  
20 invigorating recreation. And also you get to meet  
21 other -- you get to work with other city workers, and you  
22 work with your community.

02

23 It's unfortunate that the draft EIR cannot talk  
24 about the environmental benefits of restoring San  
25 Francisco's natural heritage. The 31 natural areas in San

PH

02  
(Cont.)

1 Francisco are natural areas because they're remnants of  
2 the original landscape containing flora and fauna that  
3 were here when the Spaniards arrived in 1769.

4 So the goal is to try to protect what remains of  
5 San Francisco's natural heritage. And, you know, it's  
6 been a long time coming trying to get this EIR adopted,  
7 and I think we're getting very close now, and we can start  
8 implementing some of the action items in the management  
9 plan. I'm very excited by that. So I hope we have your  
10 support. Thank you.

11 PRESIDENT OLAGUE: Thank you.

PH-Brastow

12 MR. BRASTOW: Good afternoon, Commissioners. My  
13 name is Peter Brastow. I'm director of Nature in the  
14 City, and I want to make a few comments about the natural  
15 areas planned EIR today.

16 First, I want to commend the goals which are in  
17 the natural areas plan. These, in fact, are the goals --  
18 should be the goals of the PUC and DPW and for the rest of  
19 the Recreation and Parks in managing their lands, frankly.  
20 I think the DEIR in general has done a terrific job of  
21 analyzing the environmental impacts of the proposed  
22 project, and I'd like to say that the plan is not radical  
23 at all.

24 In fact, it was a pretty serious compromise. It  
25 was negotiated with the working group several years ago

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1       chaired by General Manager Agunbiade I guess at the time.

2               And so the -- all the myths that I keep hear  
3       being perpetuated about natural resource management and  
4       weeds and lagoons and this, that, and the other thing, I  
5       don't want to take up all my time dispelling those myths,  
6       but you're hearing a lot of mythology today,  
7       unfortunately.

8               So I support the plan wholeheartedly. I would  
9       like to see it go forward. I hope we have your support,  
10      but I also have some constructive criticism that I would  
11      like to offer. And that is to say that it's -- it is a  
12      lot of -- kind of ironic that the recreation and the  
13      maintenance -- that was a typo, by the way, sir.

14              The true environmentally superior alternatives  
15      apparently are the recreation and maintenance  
16      alternatives, which I find to be quite ironic, considering  
17      that we're trying to restore the natural environment. So  
18      the project plan -- neither the project plan nor the  
19      maximum restoration alternative are the environmentally  
20      superior alternatives, and I would just like to ask a few  
21      questions about that.

22              What are the assumptions behind those  
23      alternatives becoming the environmentally superior  
24      alternative? Which human environment are we actually  
25      trying to create if the maximum restoration alternative is

PH

02  
(Cont.)

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1 not the environmentally superior alternative? One where  
2 nature conservation is not paramount?

3 What, in fact, is environmental sustainability  
4 without the actual conservation of our indigenous  
5 biodiversity? I mean, that should be the underlying  
6 fabric of sustainability. And so I thank you for  
7 extending the comment period because I'm going to need  
8 some more time to help you answer these questions.

9 And a couple more things, so I'm afraid that the  
10 true impacts of the maximum restoration alternative are  
11 really hard to evaluate because the description of that is  
12 literally only two pages long, and then it goes into the  
13 impacts, which is a few pages, but within describing the  
14 impacts, there's no specifics.

15 There's nothing about how the maximum  
16 restoration alternative varies from the project plan --  
17 from the project at the remainder -- at all of the sites,  
18 and so I find it really hard for the public to say, well,  
19 this is what the maximum restoration alternative is going  
20 to do or this is what the maximum recreation alternative  
21 is going to do at any given site.

22 And finally, we would like to have a lot more  
23 specifics, as I said, included in those other  
24 alternatives, including at Sharp Park. I think given that  
25 the proposed project includes the 18-hole golf alternative

PH

04  
(Cont.)

1 from the alternatives report, the maximum restoration  
2 alternative should include restoring all of Sharp Park  
3 golf course. Thank you.

4 PRESIDENT OLAGUE: Thank you. John Keating,  
5 Richard Harris.

PH-Keating

6 MR. KEATING: Good afternoon. I'm John Keating.  
7 I want to thank you for your public service. I'm a native  
8 and resident, and curiously, I realize my first house was  
9 right across the street from the speaker a couple ago,  
10 Greg Gaar. So I appreciate all the ardent advocacy of the  
11 citizen comments on all sides of this issue.

01

12 I think your highest duty and your highest  
13 benefit you can provide in society is making sure that the  
14 staff reports you're getting in the environmental impact  
15 reports are straight up. That's all I think you can  
16 really do is make -- because you got to rely on your --  
17 those reports, but make sure they're straight up, and I  
18 don't know the answer to that. I've heard a lot of things  
19 both ways.

20 What I suggest generally in other areas I've  
21 been involved in are the two easiest ways to find out  
22 whether you're getting good, impartial analysis is, one,  
23 what are the presumptions that are being made, the  
24 unfounded presumptions? Everyone always makes unfounded  
25 presumptions. So to find out whether it's biased or not,



PH

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(Cont.)

1 find out whether they're all sort of in one favor.

2 Do they make presumptions that always go in one  
3 favor, or are the presumptions balanced in valuing  
4 recreation versus natural restoration, in evaluating  
5 whether these restoration efforts will have adverse short  
6 term impacts regardless of the long term impacts? So you  
7 look at whether the presumptions all go one way.

8 The second thing I think you look at is what's  
9 being considered and what's not being considered. Are  
10 they looking at the relevant issues? We have maybe, what,  
11 100, 150 years of managing these parks in our city  
12 balancing these issues. I think if you're finding that  
13 they're making a radical departure in a general management  
14 strategy, you ought to have a heightened scrutiny then.

15 And, you know, quick analogy is when we got our  
16 house -- and I live on sort of the east end of the Sunset  
17 up above the Sunset looking out -- the biggest attraction  
18 on our day looking at it a blue heron flew right over the  
19 top. So I thought this was cool. We had a lot of blue  
20 herons coming over, and we had hawks. We had a hill  
21 nearby, and there was a natural restoration plan, which I  
22 favored, and it was a good deal.

23 Subsequently, we lost some habitat for the blue  
24 herons and all those hawks. I don't know whether they'll  
25 ever come back, but now we have ravens all over the place.

PH

1 So the question is what's the short term?

2 The other analogy is I spent my childhood  
3 clearing out what we called greasewood, which is coyote  
4 brush that grows when you let things grow wild around  
5 here. And it's called greasewood because the cities made  
6 us cut it out --

7 PRESIDENT OLAGUE: Thank you.

8 MR. KEATING: -- because so it was so dangerous  
9 for fires. Thank you.

10 PRESIDENT OLAGUE: Thank you.

PH-Harris

11 MR. HARRIS: Good afternoon, Commissioners. I'm  
12 Richard Harris. Thank you for your time on this. I am a  
13 founder of the Public Golf Alliance, and we are concerned  
14 with issues having to do with the city's golf courses. We  
15 have submitted previously to Bill Wycko a letter with  
16 substantial exhibits on the history of the Sharp Park golf  
17 course.

18 We are -- we want to assist you and your staff  
19 in knowing the history. We've done a lot of research on  
20 it. There's old newspaper articles, old photographs.  
21 There's writings of MacKenzie himself. The staff has  
22 designated the golf course as a historic resource, and we  
23 support that designation.

24 The -- and we -- given very substantial amount  
25 of additional support than the matter that was in the

PH

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1 staff's report. The -- we will be submitting additional  
2 comment. Generally the notion of sharing the property  
3 between species and golfers, uhm, we support that. Uhm,  
4 and, uhm, we think there are ways that it can be done  
5 where the property can be shared to mutual benefit by the  
6 species and the golfers.

7 There are some details in the -- in the draft  
8 EIR that we will make more comment -- more detailed  
9 comment on. We have architects and engineers that are  
10 looking at that, and we will have detailed comment. We  
11 give preliminary comment in the letter that you've had.  
12 We will have much more detailed comment about that.

13 Uhm, and we, uhm, look forward to continuing to  
14 participate in this process with the city, with the County  
15 of San Mateo, and with your body and with your staff.  
16 This is very important property. It's significant to the  
17 world of golf. And I have some letters that have come in  
18 from the World Golf Association, the PGA, the National  
19 Golf Course Superintendents Organizations, and we will be  
20 submitting those as well.

21 Thank you very much. We look forward to  
22 working -- cooperating with you and with your staff.

PH-Noetzel

23 MR. NOETZEL: Good afternoon. I'm Steven  
24 Noetzel. I live in the mission. I happen to also be a  
25 commissioner on the veterans affairs commission in San

PH

1 Francisco. So I thank you all for your service as well.

2 I -- I do have a dog in this fight. She happens  
3 to be a beautiful black lab mix that we got from the SPCA  
4 some six years ago. And that's what I want to take a  
5 moment to talk about, the squeeze that's happening in this  
6 city between dog adoption numbers and at the same time  
7 restriction of space for dogs to run free.

8 And so I hope that you all recognize that we in  
9 San Francisco have probably the most progressive and most  
10 productive SPCA in the entire United States. The ratio of  
11 dogs adopted by families in San Francisco is higher than  
12 almost anywhere in the United States, and almost no dogs  
13 are euthanized in San Francisco.

01

14 So you have this squeeze while at the same time  
15 young families and young people are adopting dogs in  
16 record numbers, at the same time there's a squeeze in some  
17 plans to restrict the places that those dogs can run,  
18 either on leash or off leash, and I think this needs to be  
19 seriously looked into and addressed by any EIR or any  
20 planning for off-leash dog areas in the future.

21 Don't restrict them. There's more dogs coming  
22 every day. Thank you.

PH-Emanuel

01

23 PRESIDENT OLAGUE: Thank you.

24 MR. EMANUEL: Hello, I'm David Emanuel. I've  
25 lived in Glen Park. I am for the maximum recreational

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01  
(Cont.)

1 alternative, and I just wanted to point out the Golden  
2 Gate National Recreational Area just proposed a dog  
3 management plan, and they forcefully cited the dog play  
4 areas in the San Francisco parks as alternatives.

5 So if those areas are closed, like the maximum  
6 plan is suggesting, people with dogs will not have places  
7 to take their animals for exercise with them. So I just  
8 want to point out that it's -- that this plan is just a  
9 further reduction of those areas, and please consider  
10 allowing our animals to have space because they are  
11 compatible with plants. Thank you.

12 PRESIDENT OLAGUE: Thank you.

PH-Solomon

13 MR. SOLOMON: Good afternoon, Commissioners.  
14 Mark Solomon again, an invasive nuisance in the north  
15 Mission, who rolled into town 22 years ago today to a  
16 police riot on the Castro, and the ultimate Natural Areas  
17 Program happened 11 years later when the earth shook  
18 violently.

01

19 I think that this EIR is probably going to be  
20 incomplete unless it analyzes the option of taking Sharp  
21 Park and giving it to the Golden Gate National Recreation  
22 Area. That's something that has been proposed already. I  
23 don't believe it's covered in this. I really think that  
24 should be on the table for analysis in order for this to  
25 be a complete EIR. Thank you very much.

PH

1           PRESIDENT OLAGUE: Thank you. Is there  
2 additional public comment on this item? Seeing none,  
3 public comment is closed. And just wanted to repeat that  
4 the comment period has been extended to October 31st? Is  
5 that a Monday or -- at 5:00 p.m.? Commissioner Antonini.

PH-Antonini

6           COMMISSIONER ANOTONINI: Thank you. Thank you  
7 all for your comments. Just a few overviews and some  
8 questions. Of the 31 areas within the City and County of  
9 San Francisco under consideration, leaving Sharp Park out  
10 for the moment, of course, we have to realize that these  
11 are not there by design but rather by happenstance.

12           Many of them happened to be in areas that were  
13 un-accessible or hard to build on or at the tops of hills  
14 or various other things, and so I don't know that we  
15 necessarily have to look at whatever exists there as being  
16 the best use. I'm not saying that these are areas that  
17 should be developed.

18           Obviously, we have to kind of consider the  
19 situation and decide whether or not what has developed  
20 over the years is what we want on the lands and if every  
21 inch of these lands should be maintained as public  
22 property.

23           I mean, I often walk around when bigs, walk  
24 around a lot of the areas that are under consideration,  
25 and one thing that's quite clear is many have become

PH

01

1 overgrown over the years. Trees are wonderful things, but  
 2 too many trees, like anything else, is not the best thing  
 3 and, you know, thinning them out makes for a healthier  
 4 environment sometimes. Makes it safer; makes it the ones  
 5 that remain healthier, and they're -- I think careful tree  
 6 removal would be something that is important.

02

7 However, on the other side of it is those who  
 8 want everything completely removed back to the so-called  
 9 natural environment. The pictures I've seen of San  
 10 Francisco, you know, in 1850 or before is mostly sand,  
 11 wind, and almost an un-inhabitable area. So we've done a  
 12 wonderful job in making this city that people can live in.

13 So I think to -- you know, I don't know what  
 14 native plants are really native. There couldn't have been  
 15 very much from the pictures I've seen, but maybe some  
 16 scrub grass and an occasional tree here or there, but not  
 17 a lot. Uhm, so you know, I think we have to look  
 18 carefully at a lot of these areas.

19 For example, you take places like Bayview Park,  
 20 which is brought up in here, parts of McLaren Park, the  
 21 PUC lands around Laguna Honda, even parts of Mount  
 22 Davidson, but, you know, make sure that we're looking at  
 23 this and maximizing our natural resources so that people  
 24 can use them as well as possible, and some of these areas  
 25 probably need improvements. Just to leave the mess they

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1 are probably may not be the best thing.

2 You know, people talk about dog walking areas.  
3 People talk about recreational areas. We have a big  
4 shortage of playing fields and other things and these are  
5 things that we need to really look into.

6 The other thing in regards to Sharp Park in  
7 particular, I'm glad the one speaker brought up the fact  
8 that before there was a break water, you know, the Laguna  
9 Salida [sic] means Salt Lake, and it was basically -- or  
10 salt lagoon, you know, which was a salty environment that  
11 would not have supported the red-legged frog and the  
12 garter snake. So we actually created a breeding ground  
13 and, you know, to eliminate the break water would, of  
14 course, eliminate those species.

15 So I think that part of this whole thing is  
16 protecting something that was never there in the first  
17 place, but I'm not saying that we shouldn't protect them,  
18 but they're not really indigenous to the area. The most  
19 important thing is to make sure that, in my opinion, that  
20 the Sharp Park golf course is maintained.

21 I did not see -- and maybe staff can answer this  
22 question, Jessica Range in particular -- uhm, I didn't  
23 see -- there's talk about removing one of the holes of  
24 Sharp Park, and is there a replacement? I did not see  
25 that in the EIR. Maybe it's in there and I didn't read



PH

06  
(Cont.)

07

1 carefully enough, because a 17-hole golf course doesn't  
2 work real good for me.

3 And also I did not see an alternative that  
4 utilized some of the space to the east of Highway 1, which  
5 now has four holes -- I believe it's either three or  
6 four -- and I always thought when I was golfing there that  
7 that would be a great place to put a couple of extra  
8 holes.

9 Because back in 1981 when we had one of our big  
10 storms, I remember what happened to number 16 and 17, and  
11 they got washed out for quite a few years. Took a long  
12 time to get them back in there, and mostly you were  
13 playing golf in the sand. So I think you may be fighting  
14 kind of a losing battle on it.

15 I'm not saying you should ever really change  
16 this historic course, but you know, some of the things you  
17 have to look at is if you're losing a hole somewhere,  
18 certainly maybe you can reclaim it on the other side of  
19 Highway 1 and make sure that the holes you do have can  
20 withstand the forces of Mother Nature and make the course  
21 a really good, playable course at all times.

22 Maybe you can answer my question about these  
23 alternatives.

24 MS. RANGE: Jessica Range, planning staff. Uhm,  
25 we did identify that removal of the hole would be a

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1 significant impact on the Sharp Park golf course as a  
2 recreational resource. And so the recreation section  
3 identifies a mitigation measure at the very end, which is  
4 to restore the playability of the Sharp Park golf course  
5 as an 18-hole course, and after the mitigation section,  
6 there's also a programmatic analysis of the impact of the  
7 mitigation measure, and there's two options that are --  
8 are proposed programmatically.

9 And one is to restore the hole on the east side  
10 of the highway, and the other one is to restore the hole  
11 on the west side of the highway. That project would need  
12 to be further evaluated. It's only addressed very  
13 programmatically at this stage, so Rec and Park would have  
14 to come back for additional environmental clearance to do  
15 that.

16 COMMISSIONER ANTONINI: Okay. Thanks for your  
17 answer. I would say whatever you need to do to make sure  
18 you end up with an 18-hole course is important, and also  
19 work with the San Francisco Public Golf Alliance and Bo  
20 Links and Richard Harris and the other people who spoke to  
21 make sure we're as close to the historic Alister MacKenzie  
22 design as possible.

23 But where there are situations where, even  
24 without the frog and snake habitat issue, if it's kind of  
25 a losing battle with nature, we have to make sure that,

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1       you know, we make a course that's going to work. So thank  
2       you very much for your work on this.

3               PRESIDENT OLAGUE: Commissioner Sugaya?

4               COMMISSIONER SUGAYA: Oh, I should have taken  
5       off. I'll submit something in writing.

6               PRESIDENT OLAGUE: Okay.

7               COMMISSIONER SUGAYA: Had a concern about the  
8       way the resources --

9               PRESIDENT OLAGUE: Thank you. I think we're  
10       done with the public hearing on this item, and we will be  
11       taking a 15-minute recess after this.

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CERTIFICATE

I, the undersigned, a Certified Shorthand Reporter  
for the state of California, hereby certify that the  
foregoing proceedings were reported by me, a disinterested  
person, and were thereafter transcribed under my direction  
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and true record of said proceedings.

Executed this 15th day of November, 2011.

\_\_\_\_\_  
LAURA AXELSEN, CSR NO. 6173