

Feedback Received Best Management Practices

Comment 1, Jake Sigg:

One point (Issue 2) is of such overriding importance that I take the time to write it.

Issue 1. From the draft:

The three most common trees are:

Blue Gum Eucalyptus - 15.9% of the city's trees and 10.7% of the leaf area

Monterey Pine - 8.4% of the city's trees and 22.2% of the leaf area

Monterey Cypress - 3.8% of the city's tree and 14.2% of the leaf area

Source: 2007 UFORE Report (which utilized 2000 census data, and studied changes in canopy cover for the entire 9 county SF Bay Area Region between 1980 and 2000.)

I question the 15.9% figure given for the blue gums, based on my observations. Mt Davidson alone has 11,000, Mt Sutro has even more than that, and there are huge stands in the thousands in Glen Canyon, McLaren Park, Bayview Hill, Golden Gate Park, Buena Vista Park, and scattered stands around the city.

The source of the 15.9% and other figures should be made clearer, as it could not be found in the 2007 UFORE report given as a reference. (A search performed on the document for both "blue gum", and "eucalyptus" got no "hits".)

Issue 2: Public Safety, especially fire danger

On page 3, the first Best Management Practice listed is "Ensure Public Safety."

Comments:

The dangers to human safety listed are those related to "falling trees or tree parts, fire, and erosion". The text then goes on to give separate reasons why trees might lose parts or "fail", what factors might increase fire danger, and that "inappropriate removal of trees" might "increase erosion potential." But nowhere is it pointed out that prolonged drought or, more generally, climate change, can cause all three of these dangers, especially in the case of the Tasmanian blue gum. Because of this, any BMP focused on ensuring public safety needs to be flexible enough to address these possibilities as well.

Eucalyptus globulus is a grand tree, and it is not to be wondered that it has acquired affection in the minds of large segments of the public, including mine. However, it is past time that we adopt a more realistic stance toward its management. The tree comes from an area of year-round rainfall and is not adapted to survival in a Mediterranean climate. The reason it has succeeded in parts of California up to now is because it is either planted in riparian or other areas with a high water table or along the coast with abundant fog drip. Its carefree days are over in California with the change in climate, a pattern that is expected to continue and perhaps intensify. Fog drip has so far bridged the summer gap in the rainy season, but the tree cannot survive on fog drip and must have copious winter rainfall. This has been severely deficient in recent years, a state of affairs which seems likely to continue. Aside from the question of adequate rainfall, as noted previously the trees were planted mostly 100-130 years ago. They have been

getting larger every year, and the larger they become the more water they require. It should be noted that we are in a unique period in history--we have never been in this situation before. Trees planted in a foreign land without the natural controls of its homeland have not until now reached maturity.

A credible City document must recognize the reality of climate change and be flexible in accommodating it. One can easily see that the wild stands of blue gum are currently in a perilous state and pose a safety threat to the community. Several hundred trees have outright died, others are about to die, others are affected to the extent that they may either topple from weakened root systems or may shed limbs. Ironically, limb drop is most likely to happen not on windy days but on calm, warm days when the loss of moisture through leaves is not replaced fast enough because of the dry soil conditions, leading to a loss of turgor pressure in the cells. This lack of turgidity in the cells causes limbs to break clean and come hurtling down without warning. These are hazards to hikers on trails as well as to residences adjacent to groves.

The dead and dying trees and decades' accumulation of fuel also pose a fire danger. A document that professes to value public safety cannot ignore a situation that has the potential, in an extreme case, to set the entire city ablaze--even possibly the East Bay (blue gum bark strips have been documented carrying fire 12 miles).

The BMP document should say that the problem is extremely serious and it is urgent that it be addressed ASAP. It will take a lot of money and the City needs to be positioned to apply for and expend that money, therefore the City needs a management plan as soon as possible. The BMP document should not merely help the Urban Forestry Council in its evaluation of plans that may come along; it needs to strongly recommend that a plan be done ASAP and that FEMA or other funds be applied for immediately.

I feel a sentence or two regarding clearances to structures...<https://law.resource.org/pub/us/ccr/gov.ca.oal.title19.html>

Comment 2: Michie Wong
Fire Marshal, Division of Fire Prevention and Investigation

CCR Title 19:

§3.07. Clearances.

Note • History

(a) General. No combustible material shall be placed or stored within 10 feet of any building or structure.

(b) Ground Clearance. The space surrounding every building or structure shall be maintained in accordance with the following:

Any person that owns, leases, controls, operates, or maintains any building or structure in, upon, or adjoining any mountainous area or forest-covered lands, brush covered lands, or grass-covered lands, or any land which is covered with flammable material, shall at all times do all of the following:

(1) Maintain around and adjacent to such building or structure a firebreak made by removing and clearing away, for a distance of not less than 30 feet on each side thereof

or to the property line, whichever is nearer, all flammable vegetation or other combustible growth. This section does not apply to single specimens of trees, ornamental shrubbery, or similar plants which are used as ground cover, if they do not form a means of rapidly transmitting fire from the native growth to any building or structure.

(2) Maintain around and adjacent to any such building or structure additional fire protection or firebreak made by removing all bush, flammable vegetation, or combustible growth which is located from 30 feet to 100 feet from such building or structure or to the property line, whichever is nearer, as may be required by the enforcing agency if he finds that, because of extra hazardous conditions, a firebreak of only 30 feet around such building or structure is not sufficient to provide reasonable fire safety. Grass and other vegetation located more than 30 feet from such building or structure and less than 18 inches in height above the ground may be maintained where necessary to stabilize the soil and prevent erosion.

(3) Remove that portion of any tree which extends within 10 feet of the outlet of any chimney or stovepipe.

(4) Cut and remove all dead or dying portions of trees located adjacent to or overhanging any building.

(5) Maintain the roof of any structure free of leaves, needles, or other dead vegetative growth.

(6) Provide and maintain at all times a screen over the outlet of every chimney or stovepipe that is attached to any fireplace, stove, or other device that burns any solid or liquid fuel. The screen shall be constructed of nonflammable material with openings of not more than 1/2 inch in size.

(7) Hazardous vegetation and fuels around all applicable buildings and structures shall be maintained in accordance with the following laws and regulations:

(A) Public Resources Code Section 4291.

(B) California Code of Regulations Title 14, Division 1.5, Chapter 7, Subchapter 3, Section 1299 (see guidance for implementation "General Guideline to Create Defensible Space").

(C) California Government Code Section 51182.

(D) California Code of Regulations, Title 24, Part 9, Chapter 49.

Comment 3: Peter Brastow, Department of the Environment, Biodiversity Coordinator

I really feel strongly about this paragraph being worded differently:

Competing land use priorities and differing management practices: Significant portions of San Francisco's mature and historic tree stands exist within designated parks and open space parcels that have been integrated into the City's identified Significant Natural Resource Areas managed by the Recreation and Parks Department. Through the Recreation and Open Space Element 3, the City is charged with preserving and protecting these remnant fragments of San Francisco's original landscape. Thus,

management priorities and best management practices for some of the mature and historic tree stands may be different from, ~~and possibly in conflict with~~, management practices that are appropriate for other areas of the urban forest.

The reason is that the tone maintains a pejorative treatment of the Natural Areas Program, as though, "we have to live with this...it's City policy" as opposed to "In order to promote biodiversity, wildlife habitat, and healthy forests/plantations (making the plantations more like forests, actually), the City manages these stands in a natural resource management context."

I'm just not clear exactly what the conflict is with other areas. And so unless we can come up with one, I'd rather not state it like that. In the case of the Presidio, it's an actual conflict in that parts of the Historic Forest, the Signature Stands, literally have to be managed/replanted in military rows. The Presidio VMP is the attempt to reconcile that conflict. Since none of our stands have that designation, then there is no reason why they cannot all be managed for the simultaneous values of habitat, tree health, etc. Even if we acknowledge that a stand of cypress in Golden Park in a lawn-like setting will be managed differently from a natural area stand, that just goes without saying, and there's no reason to state it as a conflict.

Here's a possible solution.

- **Diverse land use priorities and management practices:** The mature tree stands exist in various environmental and management settings. Significant portions of San Francisco's mature and historic tree stands exist ~~within designated parks and open space parcels that have been integrated into~~ the City's identified Significant Natural Resource Areas managed by the Recreation and Parks Department. Through the Recreation and Open Space Element³, the City is charged with preserving and protecting these remnant fragments of San Francisco's original landscape. Thus, management priorities and best management practices for some of the mature and historic tree stands may be different from, and possibly in conflict with, management practices that are appropriate for other areas of the urban forest.

2. You have a repeat:

" The San Francisco Bay is also a major stop for migratory birds along the Pacific Flyway. The Migratory Bird Treaty Act protects all migratory birds, their nesting sites, and their eggs from any harm, including removal or transport."

3. I would prefer to have a bit more context for the habitat section:

"San Francisco is located in a biological hot spot, the California Floristic Province⁵, where many endemic and rare species of plants and animals have evolved, **among a diversity of indigenous plant communities, including grassland, dunes, coastal scrub, wetlands and oak woodlands. Like the built environment, the city's urban forest has been installed into this indigenous ecology, and should be managed in this context, along with the other management imperatives and priorities.**"

Both Jake Sigg and Ruth Gravanis shared the copies of the draft with me. I understand that copies were sent only to those who are listed as having provided input during hearings. I was unable to attend those hearings, but do have both proofreading catches and comments to make.

Proofreading: (Tedious to list, but I don't have a version of Acrobat that allows me to insert edits in .pdf files!)

Page 1, insert hyphen between "even" and "aged" so it reads "even-aged"

Page 2, next to last paragraph, first sentence, insert hyphen between "Under" and "funding", so it reads "Underfunding"

Page 6, 2nd paragraph, line 2, "...and encourages city residents..." [Tricky, but the operative noun is "presence", which governs both "helps" and "encourages"], next to last paragraph, next to last line, "...reducing excess dry fuels where appropriate...", last paragraph, first sentence, "...improve property values..."

Page 7, first paragraph, second sentence, "...and with views of forested areas..."

Page 8, first paragraph, first sentence. This sentence is very complex and hard to read! Suggest re-writing as: "Plans for new tree plantings, tree replacements, and tree removals (to ensure ongoing overall forest health, meet canopy coverage goals, manage natural regeneration, and to care for existing trees), as well as plans for senescence, are all appropriate parts of forestry management planning."

Comments:

In the BMP labelled Ensure Public Safety, there is no mention of either prolonged drought or climate change among the factors that may lead to falling trees, fire, or erosion.

In the BMP labelled Increase Age, Structural, and Species Diversity,

--suggest inserting "prolonged drought" near the end of the first sentence, so it reads "...pests, diseases, prolonged drought, and other changing environmental conditions.

--suggest adding to the end of the second sentence in paragraph 2 "...environment; others, especially Tasmanian blue gum eucalyptus, become dangerously distressed during periods of prolonged drought."

--suggest adding to last paragraph, second sentence "...unless an acute hazard due to a major pest or disease, weather event, prolonged drought, climate change, or other impact..."

--suggest adding to last paragraph, third sentence "...to ensure any developing pests or diseases, or effects of prolonged drought or climate change, are identified..."

I note that the BMP labelled "Protect and sustain iconic forest stands", unlike other sections of this document, does not have footnotes or references to scientific-sounding bases for calling this a Best Management Practice. While I can see the appropriateness of mentioning "iconic tree stands" within other BMPs as special cases, to have an entire BMP on this topic seems excessive. (Surely the reference to the term "Biophilia" could have occurred anywhere in the document!)

I am particularly bothered by the statement that "Management of these stands may require continuity of species at the cost of species diversity." **Please remove it.** That one sentence, which is not essential to the general point of the section (people like certain tree stands and become attached to them) has the potential to severely limit healthy public discussion over provisions in RPD's Significant Natural Resource Areas Management Plan", currently under environmental review but expected to be adopted sometime later this year.

Finally, I am greatly bothered by the opening sentence of the BMP labelled "Increase environmental benefits". Any statement that seems to imply large trees are better than small trees will be used by opponents of management plans that propose thinning overcrowded stands of trees by removing large trees, even if those plans include provisions for one-to-one replacement re-plantings, to justify their positions. (I am obviously referring to parts of RPD's proposed SNRAMP.) The statement is also not consistent with the 3rd paragraph of this section, where it is pointed out that "tree removal is an important and necessary part of managing healthy and safe trees." Furthermore, I don't see that the opening sentence is essential to the rest of the section. **Please remove it, or at least relocate it to a place nearer the end of the section.**

Thank you for considering my comments. I apologize for not having sent them sooner, but I was unaware that this document existed until Monday evening.

Comment 5: Dee Seligman

I want to commend this committee, particularly John Leffingwell, on doing an excellent job on this draft of Best Management Practices. You and he listened attentively to all presentations and to public comments and then carefully thought through the issues and outcomes to address the salient points. I am grateful for the opportunity to have given feedback along the way.

I do have a few suggestions to strengthen it and make it more practical:

* "Even aged forested areas"

1. If you don't want an even-aged forest, include reforestation as a BMP, with concomitant funding and expertise required.

* "Increase Age, Structural and Species Diversity"

1. Differentiate between Monterey pine and cypresses from Blue gum eucs. The pines and cypresses are coming towards the end of their lives, but Blue gums live for 350 years or more, unless they are girdled or have pesticides like Milestone sprayed under their canopies.

2. The understory, as well as the trees, should be managed, and girdling should be stopped.

* "Ensure Public Safety"

1. Any tree assessment for risks near trails, roads, houses, etc. should be a numeric system that DOES NOT INCLUDE "Suitability for Preservation", which has to do with construction and not public safety. "Suitability for Preservation" is a value-driven concept, not a safety issue. When the assessor looks at targets, they should be based on the target's occupancy over 24 hours.

2. Deputy Chief Michie Wong recommended that humidity, wind, and soil moisture monitoring take place to understand fire potential. The Brown Transect is an easy scientific field system to inventory downed woody material to know fuel loads by counting downed woody pieces that intersect vertical sampling planes. Also, the fuel moisture analysis that Wong recommended is needed before one could reasonably judge the ignition potential.

* "Protect habitat and wildlife"

1. Professor Stebbins and Professor Dov Sax did extensive counts of birds, mammals, insects and reptile in the East Bay Hills. I don't think anyone has done that for San Francisco's Historic Tree Stands, so the debate on habitat value of Blue gums cannot be resolved.

* "Increase environmental benefits"

1. The statement "Tree removal is an important and necessary part of managing healthy and safe trees" is too broad. My own understanding is "tree pruning" is an important and necessary part of management for tree health, and "tree removal" may be necessary for public safety, but "tree removal" is not a standard BMP for managing healthy trees.

You have listened to innumerable presentations about BMPs and are tasked with synthesizing the best science and practice that you heard. It's taken considerable patience and effort to draft what you have, and I commend you on this work, particularly on the inclusion of site specific needs.

However, the document in its current state is an amalgam of reasonableness, inconsistency, and inaccuracy. It should not be pushed forward to the whole Council without a careful review and response to these problems.

1. **Regrowth:** your draft indicates "there is little to no natural regeneration occurring" in one place and in another places posits that IPM "should be used to manage... unwanted regrowth" and its "judicious herbicide use is expected to be a critical component." I submit you can't have it both ways.
2. **Goals:** your draft lists safety, state and federally listed species, community input, base, baseline data (not a goal, but a strategy), age and structural diversity, species diversity, and tree removal, a list of how to prioritize (again is not a goal, but a strategy), wildlife habitat, and monitoring (not a goal, but a strategy), and IPM (again, a strategy, not a goal.) You're mixing oranges and apples, strategies and goals.

My question is what do you want to have happen with our trees? There should be a statement of how the UFC values the trees we have and wants to manage them

to sustain them. These goals obviously exist within a political context, which you should acknowledge, but above all, you are the guardian of our urban forests.

3. **Tree removal:** The inclusion of tree removal as a goal is tantamount to saying we (the UFC) have already decided some trees should be removed to “improve the health of surrounding trees, improve access and use, or for plant community conversion.” Removing trees for safety is one thing, but the other rationales are based on community values. One person wants one kind of tree; another person wants a shrub. One person wants a trail there; another person wants the forest left alone. This goal is so poorly and loosely stated that whoever talks the loudest and longest is likely to have their personal values implemented. It is not a clear, rational, scientific statement of under what conditions trees can be removed. We desperately need such a statement.

Based on my own values, I ask under what circumstances the UFC would want trees removed for “plant community conversion”? Can we not find other places than our few real urban forests to plant native scrub? Why would our one agency tasked with protecting our urban forests condone converting urban forests to grasslands and scrub?

4. **Meaning of community:** this document begs the question of what “community” means, leaving it open to the loudest voices. At one point there is a reference to the “greater community” in which context the management of the urban forest will be “viewed.” At another point we are told that the goals should be “informed by community input from those people who live adjacent to and use the parks/open space.”

I don't know what the “greater community” means: every resident of San Francisco? Only voting residents? Only property owners? Do we include tourists? Do we include all Californians? Does it mean organizations, and if so, which organizations are accepted? What about scientists and historians who live elsewhere but study our forests? The phrase “people who live adjacent to the parks/open space” is clear, but how would we know what are the opinions of people who “use” the parks/open space? Will we be doing massive surveys of park users? I doubt it.

5. **Baseline data:** the document refers to the need for a “qualified professional to identify those forests in the greatest need of management.” I submit that this professional should not be from a company that has already worked for Rec and Park, which has a vested interest in converting the forests according to SNRAMP. Thus, it should not be a company that has a vested interest in future contracts.
6. **Rare species:** this document refers to “state and federally listed species” and then refers to “rare and endangered plants.” There is a difference between “endangered” or “rare” and between federally protected and state protected species. Also, should the UFC defer to an organization whose proprietary mission is

to favor a particular type of flora? Even within CA Native Plant Society there are distinctions among what is considered “rare” in CA but not rare elsewhere and what is rare in CA and also rare elsewhere. There is a distinction made among rare, threatened or endangered categories, as well as between rare, threatened or endangered plants and those simply on a “watch list”. Your statement allows for a stew of whatever one wants thrown into the pot. I recommend you skim that stew and save only the most clearly identified ingredients.

- 7. Structural and Species Diversity:** this document refers to these two concepts as goals for a healthy and functional forest. Both of these concepts are problematic.

We know there are many single species forests that are widely regarded as valuable and functional. Witness redwoods in northern CA; maple forests in New England; ponderosa pines in the Colorado plateau or the Sierra Nevada.

We already have structural diversity in our forests. Mt. Sutro has a subcanopy of sub-canopy of acacia and a sprinkling of other trees, including plum, pine, holly, and even casuarina. Ivy provides habitat, as does the understory of blackberry. I would ask what is it about the current distribution of birds in Sand Francisco that needs to be corrected? What price do you think the city should be willing to pay to have the kind of structural diversity to attract new species that never existed here or arrived incidentally?

And even more to the point, the landscape goal of conversions are not increased structural diversity but conversion to grassland and scrub, as explicitly stated in Rec and Park’s management plan for its Natural Areas.

I find both of these rationales to be irrelevant to your goals.

Please address these issues before you bring this document before the entire Urban Forestry Council and before you deliver it to other city planners and decision makers. It's critical for the best future of our urban forests, and that's your job.

Comment 6: Rupa Bose

Dear Urban Forestry Council,

Thank you to the Urban Forestry Council for holding this extensive listening series.

I have just reviewed the Draft of the Urban Forestry Best Management Practices that will be presented on Tuesday. In it, I found much to like - but also some issues that could essentially provide a carte blanche to destroy our urban forests.

I'd like to start with the positives.

-The statement that trees and green infrastructure should be at the forefront of planning rather than as an afterthought.

- The recognition that the urban forest provides benefits that cross environmental categories, such as pollution reduction.
- Community input. Though the term community needs more definition, this statement recognizes that people of this city are passionate about their urban forests.
- The recognition that snags that do not create a hazard should be left in place for wildlife.

However, I have serious concerns about some of the other statements. In sum, they could be used to justify *any* tree removal, and in fact seem to target the destruction of our urban forests. They also justify the use of pesticides even in areas where none are currently used, such as Sutro Forest in Mt Sutro Open Space. Specifically:

- "A healthy urban forest contains a mix of tree species," and the target limiting an urban forest to 10% of any species.

This is a recipe for disaster for our forests. Our San Francisco urban forests today are dominated by eucalyptus, for a reason. They tolerate growing conditions that other species don't. They are long-lived, with a life-span of 300-500 years. Contrary to statements that they are not regenerating, there is evidence that where they are allowed to do so, they do regenerate. Removing 70-80% of the trees in these forests to try to create a species mix would be devastating to the existing ecosystem. This goal cannot be considered science-based.

Would the same prescription be applied to the Oak Woodlands in Golden Gate Park? Natural forests are often dominated by a single species - as for instance Muir Woods. And though it is true that Monterey Pines may be nearing the end of their lifespans (around 80-90 years) this is not true of Monterey Cypress, which can live for nearly 300 years (the longest observed lifespan is 284 years). It is certainly untrue of eucalyptus.

Trees are not being replanted in the forests of Mt Davidson and Mt Sutro - and in fact, they are actively discouraged as "unwanted regrowth." These two forests would essentially disappear if subjected to this kind of management.

- Tree removal justifications are so broad as to essentially approve all tree removals.

Safety is a good reason, though this needs to be carefully monitored so it does not become an excuse to remove non-hazardous trees. Fire safety is actually worsened by measures that dry out forested areas and reduce moisture. Removing trees in established forests does not improve the health of surrounding trees; in fact, it can damage them owing to windthrow and damage to intergrafted root systems. "Plant community conversion" is a very poor reason to remove trees. It destroys existing green infrastructure in pursuit of questionable goals and impractical implementation.

- A "judicious use of pesticides."

In the last five years, SFRPD has not used pesticides against insects except for a limited amount to control wasps and mosquitoes. This has no bearing on trees. I'm also dismayed that the BMP espouses the use of herbicides to "prevent unwanted regrowth." Unwanted by whom? With some of the most toxic herbicides the city permits being used in these cases, it seems to me the tradeoff is a bad one.

The Urban Forestry Council was the one City organization that defended and protected trees in this city. With this Draft, it would seem to have abandoned that mission.

I request these comments to be distributed to the entire Council.

Rupa Bose, Comment 2

One argument being made to suggest that the forests in San Francisco are dying is that they aren't regenerating.

Actually, if you walk in Sutro Forest, you will see evidence of both the eucalyptus (which is the main canopy tree) and the acacia of the sub-canopy regenerating. (The combination of acacia and eucalyptus is particularly good at carbon sequestration, since the acacia fixes nitrogen.)

In fact, the Stewards use sapling removal and mulching to *stop* the trees coming back. Elsewhere (not on Sutro, which is pesticide-free) the stumps are sprayed with herbicide which goes into the interconnected root system and can damage other trees too.

Eucalyptus - like redwood - regenerates from lignotubers at the base of the tree. Since these trees are long-lived (300-500 years) forest regeneration isn't an issue. There's some self-thinning going on, but the forest as a *forest* - i.e. a population of trees - is healthy. It also means that it's not all the same age - where trees have gone down in the past, either by human hand or by wind, they have been replaced.

Where the trees are allowed to grow, they do regenerate. I attach two photographs showing young eucalyptus and acacia in Sutro Forest.

I request that the section that deals with forest health be changed to recognize both the longevity of eucalyptus and the fact that they are regenerating if allowed to do so.

Comment 7: Mary McAllister

Dear Urban Forestry Council Policy and Planning Committee,

I am writing to ask the UFC to consider the following suggestions for revision of UFC's draft of "San Francisco Urban Forest Best Management Practices." I attended all of the presentations of UFC's "listening series" and therefore understand that you have heard a wide range of opinions about the state of San Francisco's urban forest. I hope that your recommendations will be based on your professional opinion of what will best serve the urban forest and my suggestions are based on that shared goal.

One of the stated goals "universal to all areas of the urban forest" in the draft document is: "A healthy urban forest contains a mix of tree species and ages. One target goal is to have a maximum of 10% of any species and 30% of any plant family." This would require a minimum of 10 tree species in the urban forest.

Although I do not dispute that a diverse forest with respect to both species and age composition is less vulnerable to sudden failure, I believe the stated goal of "a maximum of 10% of any species" is not realistic for many locations in San Francisco.

As you know, trees are not easily grown in San Francisco, which is why it was virtually treeless prior to settlement. Salty winds from the ocean, limited sunlight, and thin soils severely limit the number of tree species that can be grown in San Francisco. The few forests that exist in San Francisco are on windy hills with thin chert soils without access to water. Tank Hill is an example of a "natural area" in which 40 native trees were planted and in which only a few survived after a few years.

UFC's own list of recommended street trees is a testament to the limited number of tree species that can be successfully grown in San Francisco. In the category "Tree species, varieties, and cultivars that do well in most locations in San Francisco" there are only eight tree species that are more than 35' tall at maturity.

I suggest that the UFC consider a caveat to its recommendation that the urban forest be composed of at least 10 tree species: At the very least, the proposed policy should say, "climate and soil conditions permitting" or some qualifier that doesn't require planting trees where they won't survive. Surely we can all agree that it is pointless to plant trees that will soon die. The death of young trees in our parks does not inspire the public's confidence in the competence of those who are responsible for them.

Secondly, I ask that UFC consider removing "plant community conversion" as one of the justifications for tree removal. As you know, this is an explicit endorsement for the plans of the Natural Areas Program to convert 1,100 acres of parkland to grassland and dune scrub.

I remind the UFC of its stated mission: "The Urban Forestry Council was established for the purpose of guiding the stewardship of San Francisco's trees by promoting a healthy and sustainable urban forest that benefits all San Franciscans while ensuring public health and safety." Surely, the explicit endorsement of conversion of forest to grassland and scrub is a contradiction of UFC's mission. The mission of the UFC requires that it remain silent on this issue. UFC's silence on this issue will not prevent that conversion from happening. Indeed, it appears to be inevitable. The conversion therefore does not need or require the explicit support of the UFC which is committed to another purpose.

Thirdly, I suggest that UFC consider removing this justification of pesticide use: "unwanted regrowth consistent with this policy." Again, this is an explicit endorsement of the methods used to prevent regrowth of non-native trees being removed by managers of public lands. UFC's silence on this issue will not prevent herbicide use by the Natural Areas Program for that purpose. However, its explicit endorsement of herbicide use for that purpose will encourage UCSF to begin to use herbicides on Mount Sutro after having made a commitment to discontinue use of herbicides on Mount Sutro. While UFC's "listening series" was comprehensive on many topics, it was virtually silent on the important question of the unintended consequences of herbicide use. There is considerable and growing scientific evidence that herbicides are damaging the soil. Some herbicides are killing mycorrhizal fungi in the soil.

Other herbicides are causing minerals in the soil to combine, making the soil hard and impenetrable to water and roots. Other pesticides are mobile in the soil and are taken

up by the roots of the plants that are not the intended target. Unless UFC wishes to expand its investigations into this issue, it is not in a position to endorse pesticide use in San Francisco's urban forest because pesticide use could prevent successful reforestation.

The UFC has been charged with an important task. I fervently hope that its recommendations will be based solely on its desire to preserve and restore San Francisco's urban forest.

Thank you for your consideration.
