

June 4, 2012
West of Twin Peaks Central Council
PO Box 27112
San Francisco, CA 94127

To: San Francisco Recreation and Park Commission
McLaren Lodge
501 Stanyan St
San Francisco, CA 94117

Dear Commissioners,

At its May 21, 2012 meeting, The West of Twin Peaks Central Council (WTPCC) voted to write a letter opposing RPD's Natural Areas Program (NAP) and to submit a comment opposing NAP as part of the NAP DEIR public comment process. WTPCC, formed in 1937, is an umbrella group of 20 neighborhood associations that share the common geographic designation "west of twin peaks." WTPCC member associations share common demographics as well— primarily owner-occupied, single-family homes. Our members choose to live here because it is a medium-density area that provides space for yards and children, as well as local commercial shopping districts, recreation options, and parks. Cumulatively, we have a shared history of protecting and improving the common characteristics and character of our neighborhoods.

WTPCC member organizations had expressed concerns about NAP at previous meetings, especially concerns about NAP's plans to cut 1,600 trees on Mt. Davidson. Prior to its May 2012 meeting, WTPCC member delegates were given "homework," links to the NAP General Management Plan (SNRAMP) section on Mt. Davidson along with the SNRAMP Executive Summary, information on NAP from the NAP website, and information from critics of NAP. At the May meeting, WTPCC heard a presentation in support of NAP from RPD Chief of Operations Dennis Kern and NAP Director Lisa Wayne, and a presentation in opposition to NAP by Eric Miller and Jacquie Procter from the SF Forest Alliance. Judging by the quality of the questions, our delegates had indeed studied the suggested material "assigned" beforehand. After the presentations and questions, WTPCC voted immediately to send this letter and comment.

WTPCC concerns with the Natural Areas Program (NAP) are as follows:

- NAP's plans to cut 18,500 trees in parks controlled by SF RPD, including plans to cut 1,600 trees on Mt. Davidson
- NAP's use of herbicides, including repeated applications at the same site, poor signage, improper applications, and concerns about children and pets playing in areas where toxic herbicides have been applied
- NAP's plans to close access to areas under its management, including closing 9.2 miles of trails, and turning the park experience into one full of "Stay on the Trails" and "Keep Out" signs
- NAP's plans to remove existing habitat (especially bushes and trees) and replace it with grassland will destroy habitat needed by wildlife and birds currently living in our parks
- NAP has done an extremely poor job of informing people, including park neighbors, of its plans; those plans were created without seeking input from park neighbors and park users

NAP has expanded far beyond its original mandate to protect and preserve remnants of San Francisco's natural heritage, into large-scale conversion of existing habitat into something completely different, conversions that will change the character and uses of the park for decades to come.

Because of these concerns, WTPCC opposes the proposed NAP Management Plan (SNRAMP) currently undergoing environmental review. We ask the Planning Department to address our issues and concerns with the Draft NAP DEIR (details below). We urge the Recreation and Park Commission to rethink its support of NAP's plans. The parks belong to the citizens of San Francisco, not to Natural Areas Program staff.

TREE REMOVALS

WTPCC **opposes NAP plans to remove healthy trees** simply because they are non-native or simply to allow more sunlight to reach newly planted, sun-loving natives on the forest floor. We fully **support the removal of hazardous trees** in our parks, but NAP's plans go far beyond that.

We are concerned that the actual number of trees removed will be much higher than the 18,500 listed. NAP does not include any trees or saplings less than 15 feet tall in its count of trees to be removed, yet the SNRAMP makes clear that these "smaller" trees or saplings will be cut down along with the taller ones. A 2007 US Forest Service report noted that just over half (51.4%) of the trees in San

Francisco are less than six inches in diameter at breast height. This diameter corresponds to a tree less than 15 feet in height. The removal of these smaller trees will significantly amplify the impact of the removal of the taller trees on aesthetics, erosion, and windthrow in natural areas, yet the Draft NAP DEIR did not consider these additional impacts.

WTPCC is concerned that claims in the Draft DEIR that trees cut down will be replaced on a one-to-one basis by native trees are misleading. The SNRAMP makes no promise to replace trees. In particular, the SNRAMP specifically states that the 15,000+ trees removed at Sharp Park will not be replaced since the natural area will be converted to coastal scrub. In addition, there were few native trees in San Francisco before the Europeans settled the area; the climate was too harsh. Native trees do not grow well in the windy, foggy, sandy or rocky soils present in most natural areas. For example, about a decade ago, NAP planted 25 oak trees at Tank Hill to replace 25 trees cut down by NAP. Only 5 of the replacement oak are still alive, and only one of those has grown.

Our concerns about the 1,600 tree removals planned for Mt. Davidson in particular include:

- Increased **erosion** from the loss of the trees
- Increased **water runoff** during storms and the potential for damage to park neighbors' property from the water or mudslides

These concerns were not adequately addressed in the DEIR.

WTPCC is also concerned that the DEIR does not adequately address **impacts on carbon sequestration and global warming** from NAP's plans to cut down 18,500 trees. A 2007 US Forest Service survey of San Francisco's urban forest notes that our trees store 196,000 tons of carbon, adding 5,200 tons of carbon to the storage each year. When a tree is cut down, it releases its stored carbon into the atmosphere (as carbon dioxide) as it decays. California State Law requires the state to reduce greenhouse gas emissions;

NAP's plans seem to be at odds with this goal. In addition, grassland does not store as much carbon as forests of trees, and the DEIR does not adequately address the impacts on this of NAP's plans to replace non-native trees with native grasses.

HERBICIDES

WTPCC **opposes repeated applications of herbicides in natural areas to remove non-native plants**. Applications of herbicides in NAP-managed areas have increased by 330% over the last four years (from a total of 26 applications in 2008 to 86 applications in 2011). Applications will continue to rise, since NAP plans to use repeated herbicide applications to kill the roots of the thousands of trees it plans to cut down. The Draft DEIR does not consider impacts from this increase in usage.

We are also concerned about **inadequate and incorrect signage by NAP** when it applies herbicides in natural areas. For example, a recent sign warned that herbicides would be applied "throughout" McLaren Park, with no more specific information on where other than "throughout." People walking in the park had two options – continue to walk in the park and risk exposure to herbicides (since you can't know from the sign exactly where in the park they were applied) or leave the park. This inadequate signage essentially closed access to large areas of McLaren Park for a period of time as people tried to avoid exposure.

WTPCC is also concerned that **NAP applies herbicides incorrectly, causing needless exposure and risk to people, pets, and wildlife** from unnecessary spraying. For example, in December 2011, NAP posted a sign that it planned to spray a mixture of glyphosate and imazapyr to eradicate cape ivy in Glen Canyon.

However, the California Invasive Plant Council website says spraying to destroy cape ivy must be done in the late spring, when the plant is "photosynthesizing actively but is past flowering, so the active ingredients [in the herbicide] move down with the sugars that are transported to underground storage organs." The spraying should never have been done in December when it would not be effective. NAP essentially put people, pets, and wildlife at risk of exposure to the herbicide for no reason, and ensured they would have to reapply the same herbicides a second time in the late spring if they want to kill the cape ivy.

It is not enough to say that NAP herbicide applications are approved as part of the SF Integrated Pest Management Ordinance that governs herbicide use by city agencies and are therefore okay, as the Draft DEIR does. The DEIR should study the application records more closely. There are **many cases where NAP usage violated IPM rules**. For example, NAP applied imazapyr in 2008 and 2009, two years prior to its approval for use by SF IPM in 2011. NAP "sprayed" Garlon in years prior to 2011, even though SF IPM had approved its use only by "dabbing and injection." NAP sprayed herbicides containing glyphosate near the water at Lake Merced, even though US Fish and Wildlife regulations ban the use of that herbicide (and many others) where there is red-legged frog habitat; Lake Merced is red-legged frog habitat.

PARK ACCESS

WTPCC opposes NAP plans to restrict access to parks. NAP plans to close 9.2 miles of trails that thread through its natural areas. At our May meeting, Dennis Kern noted that a citywide survey of what San Franciscans want in their parks identified trails and hiking as the number one need. **Yet NAP plans to close nearly a quarter of the total length of trails in natural areas (about 40 miles).** This would seem to fly directly in the face of what the public said they want in their parks.

In most natural areas, the only thing you can do is **walk on a trail**. You cannot leave the trail to explore the area, or follow a butterfly, or try to see the bird you hear tweeting. To control access, NAP builds fences. Indeed, in parks where trails in natural areas have been restored recently, fences have been built on either side of the trail to ensure people cannot leave the trail. **Natural areas become places where you can “look but not touch.”** How can children explore the wonders of nature if they are told repeatedly they must “Stay on the Trail”? This is not what we want for our parks.

When people are restricted to walking only on trails, they lose access to the entire non-trail part of the park. In over half of the parks with a natural area (17 of 31), NAP controls the entire park. That means people have lost access to all but the trails in those parks. In an additional 10 parks, NAP controls over 50% of the land. Put another way, only four of the 31 parks with natural areas have less than 50% of their land controlled by NAP. Access restrictions planned by NAP (“stay on the trail”, fences, and closure of trails) mean that entire neighborhoods will lose access to the vast majority of the parkland in their neighborhood parks. The Draft DEIR does not consider the impacts on neighbors and park users of this level of access restriction in the 27 parks where NAP controls more than half the land.

HABITAT AND WILDLIFE

WTPCC opposes the destruction of existing habitat needed by the wildlife and birds currently living in the parks. For example, NAP has removed underbrush in Glen Canyon that is used by coyotes to hide from people and dogs, and replaced it with grasslands. Unlike the underbrush, the grasslands provide little “cover” for the coyotes or other wildlife living in the natural area.

We are also concerned that some **habitat conversion is being done during breeding and nesting season**. For example, NAP applied for a “streambed alteration” permit from the California Fish and Game Dept for habitat conversion work to be done near Islais Creek in Glen Canyon. In the application, NAP clearly stated: “It is the policy of RPD’s Natural Areas Program that no new projects will begin during the breeding season (December to May).” Similar commitments were made in the SNRAMP.

However, NAP contractors used chainsaws and herbicides to destroy underbrush habitat in Glen Canyon in March and April, continuing work done sporadically since November 2011. This work took place throughout the breeding/nesting season, despite NAP’s legal commitment to CA Fish and Game and in the SNRAMP to not do habitat work during breeding season. When people informed RPD management about this, during a meeting at McLaren Lodge, Lisa Wayne, the head of NAP, said the work was being done during the breeding/nesting season because the grant for the project was set to expire. In other words, **NAP’s decision on habitat conversion in Glen Canyon appeared to be motivated by financial considerations, not by any concerns about the wildlife and birds living there.**

POOR PUBLIC PROCESS

WTPCC opposes NAP in part because of the **poor job NAP has done to inform park neighbors and neighborhood associations about its plans**. Neighbors who live immediately adjacent to Mt. Davidson, for example, have said they were never given any official notice of NAP’s plans for the park, especially its plans to cut down 1,600 trees. Established neighborhood associations, including many WTPCC members, have not been contacted by NAP. Many have said they never heard anything about the DEIR. Indeed, the Planning Department offered a tacit acknowledgement of this lack of public outreach when it re-opened public comment on the Draft DEIR last month.

NAP did not contact park neighbors and users or neighborhood associations to find out what they wanted in the natural areas in their neighborhood parks when NAP staff were developing their plans. During the plan development process, citywide NAP advocacy groups were contacted for input on what NAP should do in the parks, yet the people who live adjacent to or who regularly use the parks (that is, those who will be most impacted by any NAP restrictions) were ignored. The only input most people had was whatever they could say during a one-minute public comment at a Recreation and Park Commission meeting after the plans were already developed. The parks belong to the people of San Francisco, not to NAP staff. All park neighbors and users (not just those known to support NAP) must be involved in discussions about what to do in natural areas. Without this level of public outreach and engagement, NAP’s plans lose support and credibility.

Even when people have explained their **concerns** to NAP staff, **it seems to fall on deaf ears**. At a 2002 meeting of the Golden Gate Heights Neighborhood Association (GGHNA), members complained about NAP’s removal of iceplant at the neighborhood’s Grandview Park. Grandview is the only remaining sand dune in San Francisco (other than at the beaches), but it is completely surrounded by homes, some of which have backyards that abut the park. Over the years, neighbors and park staff had planted iceplant

at Grandview because it was the only plant that seemed able to hold the sand in place. When NAP took control of the park, it began to remove the iceplant because it was non-native. At the GGHNA meeting, several park neighbors complained that the iceplant removal had caused sand to drift into and cover their backyards, damaging their property. Lisa Wayne, the head of NAP who had been invited to respond to the neighbors' concerns, responded that NAP had no responsibility for property damage outside park boundaries caused by its removal of erosion-controlling plants. When the SNRAMP was released several years later, it called for "scattered, open sand" at Grandview Park. Over the years, GGHNA has repeatedly submitted public comments asking NAP to remove the goal of "scattered, open sand" at Grandview, yet it remains in NAP's plans.

NAP'S EXPANDED MANDATE

WTPCC opposes the expansion of NAP's mandate beyond the protection and preservation of existing remnants of San Francisco's natural heritage. The original Management Plan for NAP, written in 1995, was 12 pages long.

Over the years, however, NAP has claimed more and more city parkland, to the point that most of the land under NAP control does not have existing remnant habitat. Rather NAP has claimed land that it wants to change from the existing habitat that currently has few native plants to one that more closely resembles the habitat before Europeans settled in the area. **Because of this expansion, the final SNRAMP is 711 pages long.**

CONCLUSION

WTPCC supports the idea of preserving existing remnants of the historical habitat. **We do not support** the idea of wholesale habitat conversion that requires **cutting down thousands of healthy trees**, extensive and **repeated applications of herbicides**, **closure of access** to large areas of our parks, and **destruction of existing habitat** needed by the animals and birds living there now. As a result, WTPCC opposes NAP and its current plans for our parks.

The fundamental goals of NAP are misaligned with what San Franciscans want in their parks. To date, NAP has focused on restoring open space in San Francisco to "native" status. The SNRAMP was written to interpret "Natural" to mean "Native." That's not what San Franciscans want their natural areas to be.

We want Natural Areas to be:

- Accessible to the public
- Safe
- Well-Maintained
- Green and filled with growing things (trees and plants)

Nowhere on that list does it say "native only."

People love Golden Gate Park (which is filled with non-native species), but it's not always easy to get to – so they want miniature versions of Golden Gate Park in their neighborhoods. They want a variety of plants that look nice, and space that gives them a chance to escape where they can walk, run & play with their family, friends and pets. Purely native areas do not provide the same visual and recreational opportunities that our non-native areas do. That's why people living in San Francisco more than 100 years ago introduced non-native species in the first place. Lush and green is what we want, and we're not picky about whether it's native or not.

The Natural Areas Plan should reflect that desire, and work to accommodate it. NAP can certainly preserve a small portion of the total parks space for native plants (much like the botanical gardens include sections that are native only), but only if these native areas can meet the requirements above (i.e. accessible, walkable, safe, well maintained and green and lush). In a densely populated urban area like San Francisco, native-only should be a "nice to have" that takes a back seat to priorities like accessible, safe and lush.

WTPCC asks the Planning Department to address the issues we identified with the Draft DEIR. We ask the Recreation and Park Commission to rethink its support for NAP.

Thank you for your consideration.

Sincerely,
Matt Chamberlain,
President WTPCC