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STATE OF CALIFORNIA  
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH  
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX  
DIRECTOR

March 5, 2013

Diane Wong  
University of California  
654 Minnesota Street  
P.O. Box 0286  
San Francisco, CA 94143-0286

Subject: UCSF Mount Sutro Management  
SCH#: 2010122041

Dear Diane Wong:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on March 4, 2013, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

# Document Details Report

## State Clearinghouse Data Base

**SCH#** 2010122041  
**Project Title** UCSF Mount Sutro Management  
**Lead Agency** University of California

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**Type** EIR Draft EIR  
**Description** NOTE: Reference SCH#s: 1995123032 & 2004072067

The University of California, San Francisco ("UCSF") proposes to implement a number of management actions in the UCSF Mount Sutro Open Space Reserve ("Reserve"). The University-owned Reserve is a largely undeveloped 61-acre forest located within UCSF's Parnassus Heights campus site at the center of San Francisco. The proposed project would involve implementation of a number of management activities, including thinning of the forest, native plant restoration and enhancement, and conversion planting (removal of non-native trees and plants and conversion to native species). Vegetation management actions are proposed to occur throughout the Reserve over many years and would be phased beginning with four demonstration projects that were crafted with the interested public in the community process. New trails are also proposed.

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### Lead Agency Contact

<b>Name</b>	Diane Wong	
<b>Agency</b>	University of California	
<b>Phone</b>	415 502-5952	<b>Fax</b>
<b>email</b>	PHEIR@planning.ucsf.edu	
<b>Address</b>	654 Minnesota Street P.O. Box 0286	
<b>City</b>	San Francisco	<b>State</b> CA <b>Zip</b> 94143-0286

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### Project Location

<b>County</b>	San Francisco
<b>City</b>	San Francisco
<b>Region</b>	
<b>Lat / Long</b>	37° 45' 29.20" N / 122° 27' 27.66" W
<b>Cross Streets</b>	Vicinity of Parnassus Avenue, Clarendon Avenue
<b>Parcel No.</b>	
<b>Township</b>	<b>Range</b> <b>Section</b> <b>Base</b>

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### Proximity to:

<b>Highways</b>	US101, I-80, I-280
<b>Airports</b>	No
<b>Railways</b>	Caltrain
<b>Waterways</b>	San Francisco Bay; intermittent creeks
<b>Schools</b>	Several
<b>Land Use</b>	Presently zoned P (Public Use). Designated as permanent open space. The project is consistent with UCSF's Long Range Development Plan and with current zoning.

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**Project Issues** Aesthetic/Visual; Air Quality; Archaeologic-Historic; Drainage/Absorption; Forest Land/Fire Hazard; Geologic/Seismic; Noise; Sewer Capacity; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Vegetation; Water Quality; Wetland/Riparian; Wildlife; Growth Inducing; Cumulative Effects; Other Issues

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**Reviewing Agencies** Resources Agency; Department of Fish and Wildlife, Region 3; Cal Fire; Office of Historic Preservation; Department of Parks and Recreation; San Francisco Bay Conservation and Development Commission; California Highway Patrol; Caltrans, District 4; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 2; Department of Toxic Substances Control; Native American<sup>2</sup> Heritage Commission; Public Utilities Commission; State Lands

**Document Details Report  
State Clearinghouse Data Base**

Commission

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<b><i>Date Received</i></b>	01/18/2013	<b><i>Start of Review</i></b>	01/18/2013	<b><i>End of Review</i></b>	03/04/2013
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**From:** [dolan eargle](#)  
**To:** [Campus Planning - EIR](#)  
**Subject:** Sutro Forest  
**Date:** Tuesday, February 05, 2013 2:25:41 PM

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Ms. Diane Wong;

I am a retired member of the Dept. of Pharmaceutical Chemistry (1972-96).

For many years I lived quite near the Parnassus Campus, walking to work and returning through Mt. Sutro forest. In fact, I cleared one path over a formerly overgrown route. I have ever since enjoyed the feeling of the forest--its relatively unspoiled wildness, the summer drippings of condensed fog, the hooting of owls, the chirping of birds. Then there was a day when someone decided to remove a few eucalyptus trees, so that a pine tree might be more easily seen. Within 2 weeks, a great storm arose --the no-longer-supported pine tree was blown over, causing its removal. So here went 4 or 5 trees for no good reason.

Lately, a thoughtful group has improved the existing path of the "Topo Trail" (my name given it because it is nearly level) down to an entrance on the adjoining street. This was a worthy cause, improving experiences of the ancient forest for all comers. As always, the summer fog is condensed from the eucalypt leaves, dripping as much as 8 inches of moisture onto the earth surface every summer. This occurs throughout the forest, allowing it to survive. Thinning the forest could be very dangerous.

Now comes a terrific shock: For reasons totally unclear, there is this huge push to "thin" the forest. There has been in San Francisco a group of fanatically-inclined persons who are convinced that any "non-native" tree or shrub or bush should be removed from this city. They have dogmatically adopted a "non-native" cant that must be stopped. They do not realize that this city looked like the Marin Headlands before anything was ever planted here. Yes, Adolph Sutro wanted some wood for his silver mines, planted eucalyptus, then gave up the effort for his own good reasons.

Eucalyptus thrives very well in this city and along the coast. I am familiar with other forests like ours--primarily on the Portuguese coast where they are revered, not destroyed. Our forest is NOT flammable, but some would object, having witnessed the flames of some of some *dry* eucalypts above Berkeley some years ago. Our situation is not at all the same, but the persons convinced by a few fanatics are about to cause significant damage to our campus and our city. Already they have decimated the historic and stately eucs in Glen Canyon Park for no other reason than to move a tennis court!

Please do not be swayed by the ugly opinions of uneducated persons. Turn them away. Have them leave our forests alone!

I hesitate to add, in a suspicious note--someone is out to try to make a lot of money by persuading the uninformed and those who do not appreciate the spots of wilderness within our city. I attended an earlier concoction of this plan about 12 years ago presented in Millberry Union. A Berkeley bunch came to our campus with a multi-million-dollar plan to try to convince us to do pretty much the same as this new assault. Their scheme was rejected after the folly and outrageous cost of it was seen.

Dolan H. Eargle, Jr., PhD  
Dept, of Pharmaceutical Chemistry (ret.)  
University of California San Francisco



From: [Allen Foster](#)  
To: [Campus Planning - EIR](#)  
Subject: Sutro Forest Removal? Seriously?  
Date: Wednesday, February 06, 2013 8:12:40 AM

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Dear Ms. Wong,

I recently learned of your plans to remove most of the trees from Mt. Sutro, behind the UCSF Parnassus campus. What are you thinking? This maturing forest has another 300 years of healthy life coming to it. It is a much-needed relief from urban development, both when in or near it as well as when looking across the city. It is also habitat for tens of thousands of living things. It is not endangering anything. It is one of five (by my quick count) hills in San Francisco that is green, rather than cluttered with buildings. I am looking at it right now, in fact; it's the best part of the view from here in the Haight/Ashbury district, as well as the Inner Sunset and across the city from Presidio Heights & Lone Mountain.

In the news, UC is usually portrayed as being "out of money" and "forced to raise tuition and cut programs." Why, if this is the case, would you propose that UCSF spend a fortune to de-forest a hilltop? Do you need more bad publicity?

Please step back, look at this proposal, and reconsider taking this drastic step. If you decide to proceed with the deforestation, expect to meet significant resistance from your neighbors, and include Public Relations Damage Control in the budget, you will be extremely disliked as an institution. We expect to hear about UCSF curing diseases and saving lives, not destroying habitats on a whim.

Sincerely,

your neighbor  
Allen Foster  
625 Shrader St Apt 8  
San Francisco, CA 94117

**From:** [Victor Ortiz de Montellano](#)  
**To:** [Campus Planning - EIR](#)  
**Subject:** Comment for EIR on plan to destroy trees in Sutro Forest  
**Date:** Wednesday, February 06, 2013 11:57:13 AM

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I am disturbed to hear of a plan to destroy 30,000 trees in Mount Sutro Forest. I often go hiking there, and it is a delightful spot as is. An arborist brought in by neighbors found no evidence of ill health in the forest and confirmed, "As is typical in [cloud] forests, trees are crowded. Branching is high. Understory is deep. Leaves drip. Some trees are mature and mighty with crowns beyond view. Others are rangy, young and low enough to meet eye-levels." Destroying 90% of the trees will destroy the forest. The trees, which sequester tons of carbon, will no longer do so. The project will be extremely costly, and require the use of pesticides like Roundup and Garlon. Please leave the forest alone!

Thank you,  
Victor Ortiz de Montellano  
119 Corwin St. #2  
SF, CA 94114

From: [philran@comcast.net](mailto:philran@comcast.net)  
To: [Campus Planning - EIR](#)  
Cc: [SFForestNews@gmail.com](mailto:SFForestNews@gmail.com); [Stephen Labovsky](#)  
Subject: Help Save 30,000 Trees in Sutro Forest  
Date: Wednesday, February 06, 2013 1:25:10 PM

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Dear Ms. Diane Wong (UCSF Planning),

In accordance with the DEIR  
([http://campusplanning.ucsf.edu/pdf/Mount\\_Sutro\\_EIR\\_1-16-13\\_with\\_Appendices.pdf](http://campusplanning.ucsf.edu/pdf/Mount_Sutro_EIR_1-16-13_with_Appendices.pdf)), I am writing to ask that you please promote the option of preserving the Mt. Sutro forest. Do not allow developers and money to sway you from preserving this jewel, and much needed trees in San Francisco. Whether the cut-kill is 60% or 90% (NOTE: the DEIR is a bit confusing) this is too drastic a cut to preserve the forest and all it contains and does for San Francisco, and UCSF.

As our world changes it is not always for the better, and change/action is not always what is called for. The Belt of trees across the backbone of San Francisco (Presidio, Mt Sutro, Mt Davidson, Glen Park Canyon - already under assault, Golden Gate Park, and McLaren Park) is under extreme assault in the name of what I do not know (but suspect it is developers and money driven).

Please DO THE RIGHT THING for San Francisco, and mother-earth and protect these trees and Mt. Sutro as best you can. Removing this many trees will have a devastating effect on San Francisco and THIS FOREST that neither your nor I can foresee. Once they are removed we cannot replace them, nor regrow them quickly enough.

Your consideration for protecting Mt. Sutro and limiting any cut-kill of these trees, and preserving OUR forest with as little damage-change as possible is kindly requested.

Thank YOU,  
A concerned citizen  
Phillip Ranelli  
126 Melrose Av  
San Francisco, Ca. 94127

From: [Lu Rehling](#)  
To: [Campus Planning - EIR](#)  
Subject: Planned Tree Cutting in Sutro Forest  
Date: Wednesday, February 06, 2013 10:52:15 AM

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Hello, Diane Wong:

I am writing to provide a public comment on the Draft Environmental Impact Report concerning plans for extensive tree cutting in Sutro Forest.

I cannot understand why UCSF would undertake such an expensive and environmentally damaging project. Obviously, UCSF would do so only in the face of dismayed opposition on the part of SF neighbors and UCSF patients, such as I am.

The Sutro Forest is a wonderful haven not just for those of us who hike its trails, but for the plants, birds, and other animals who thrive there. The safety justifications that have been given for disturbing this unique and wholesome natural environment are not convincing: this is a healthy ecosystem. Its presence is a beautiful benefit to our city.

For an organization that receives so much support from this city and its citizens and that should be dedicated to public health, a plan to cut down massive numbers of trees at a time of unprecedented climate change is beyond disturbing.

Again, I cannot understand. Please do not allow UCSF to move forward with this plan, which would have powerful negative environmental impacts.

Thank you for considering this statement.

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Lu Rehling  
751 Rockdale Drive  
San Francisco, CA 94127  
650-208-8678 (cell)  
[LuRehling@gmail.com](mailto:LuRehling@gmail.com)  
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From: [Kaylah Sterling](#)  
To: [Campus Planning - EIR](#)  
Subject: PLEASE SAVE OUR TREES  
Date: Wednesday, February 06, 2013 11:38:00 AM

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Please obtain more opinions from arborists before you consider cutting down so many trees

An arborist brought in by neighbors gave a contrary view, finding no evidence of ill health and confirming, "As is typical in [cloud] forests, trees are crowded. Branching is high. Understory is deep. Leaves drip. Some trees are mature and mighty with crowns beyond view. Others are rangy, young and low enough to meet eye-levels." Destroying 90% of the trees will destroy the forest. The trees, which sequester tons of carbon, will no longer do so. The project will be extremely costly, and require the use of pesticides like Roundup and Garlon.

Thank you so much for your consideration.

One who loves the trees....

Kaylah Sterling

*"People can't see your mind, what people see is a manifestation of your attitude in your actions of body and speech. Pay attention to your attitude all the time, guard it as if you are the police, a parent caring for a child, a bodyguard... as if you are the guru and your mind is your disciple." Lama Zopa Rinpoche*

*"May there be peace, love and perfection throughout creation," John Coltrane...A Supreme Love*

From: [Tim Colen](#)  
To: [Campus Planning - EIR](#)  
Subject: Tree removal on Mt. Sutro  
Date: Thursday, February 07, 2013 1:55:04 PM

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Hello,

As a West of Twin Peaks resident who looks across at Mt. Sutro, I strongly support the proposed tree removal.

Eucalyptus trees are a highly invasive pest and eucalyptus forests are virtual monocultures - I've heard them called "biological deserts". They support far less biological diversity than what was there before. Restoring these hills with native habitat where possible would provide enormous environmental and aesthetic benefits. What is it that's so frightening about California's original environment that makes us defend eucalyptus trees so passionately? This environment existed for millions of years before we showed up; eucalyptus trees are a last-minute afterthought, and not a very good one.

Have courage!!  
Tim Colen

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Tim Colen, Executive Director  
San Francisco Housing Action Coalition  
95 Brady Street  
San Francisco, CA 94103  
Office: (415) 541-9001  
Cell: (415) 601-1709  
[www.sfhac.org](http://www.sfhac.org)

"The SF Housing Action Coalition advocates for the creation of well-designed, well-located housing, at ALL levels of affordability, to meet the needs of San Franciscans, present and future."

From: [TAMARAHORACEK@comcast.net](mailto:TAMARAHORACEK@comcast.net)  
To: [Campus Planning - EIR](#)  
Subject: Public Comment on Trees in Sutro  
Date: Sunday, February 10, 2013 9:21:05 PM

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Please do not destroy the trees on Mount Sutro. San Francisco has so few trees already. Why as a health oriented organization would you want to lower our air quality further as well as destroy this small forest where many small animals and birds find a home?

Please reconsider destroying this habitat and lessening the beauty of the neighborhood. This is something that I will remember the next time UC asks me for donations.

Tamara Horacek,  
Saddened UC Alumni



401 Miguel St #2  
San Francisco, CA 94131

From: [George B. Streissguth](#)  
To: [Campus Planning - EIR](#)  
Subject: Mount Sutro Forest  
Date: Sunday, February 10, 2013 1:53:03 PM

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Why is a premier medical institution like UCMC engaging in a controversial, expensive, and environmentally destructive project? With their combined intelligence, resources and expected planning abilities, they have the ability and should have the responsibility to be creative rather than destructive. Build up, not out.

George B. Streissguth  
Home: (415) 693-0669  
Mobile: (415) 971-0669  
Email: [geos@sbcglobal.net](mailto:geos@sbcglobal.net)



From: [Sarah Gudernatch](#)  
To: [Campus Planning - EIR](#)  
Subject: Please don't ruin Sutro Forest!  
Date: Tuesday, February 12, 2013 1:41:55 PM

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Dear Ms. Wong,

This is my public comment. I'm a San Francisco resident and hike through Sutro Forest almost every weekend. It's one of my favorite places in the city, not just for the hike but for the community that is created inside. It's a place where people exchange greetings, end up hiking with strangers, and a place where even low-income residents can enjoy the benefits of being in nature.

I can't believe that you would even think about destroying such a beautiful and important place in San Francisco. It really sickens me actually. I belong to the community center at UCSF Mission Bay and love the community feel there. They have trips to hike, kayak, etc. and it seems like destroying Sutro Forest goes against your mission as an organization.

I hope that you make the right decision and figure out a construction plan that doesn't destroy the forest. I'm really disappointed that this is even in question.

Thank you,  
Sarah Gudernatch

From: [Tara Holmes](#)  
To: [Campus Planning - EIR](#)  
Subject: Comments on Draft EIR: Mount Sutro Open Space Reserve  
Date: Wednesday, February 13, 2013 10:35:23 PM

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Dear Ms. Diane Wong,

I would like to present in this email my official public comment on the draft environmental impact report (Draft EIR) proposed by UCSF for the Mount Sutro Management Project at Parnassus Heights Campus ([http://campusplanning.ucsf.edu/pdf/Mount\\_Sutro\\_EIR\\_1-16-13\\_with\\_Appendices.pdf](http://campusplanning.ucsf.edu/pdf/Mount_Sutro_EIR_1-16-13_with_Appendices.pdf)). I expect and hope that my comment is applied to the official outcome of your and, ultimately, UCSF's decision on how to move forward managing Mount Sutro Open Space Reserve.

Let me first begin by expressing my respect and admiration for UCSF for (thus far) keeping such a unique and impressive ecosystem in tact. I personally enjoy hiking the trails and "disappearing" into the tranquility and serenity that Mount Sutro offers. It's also a local nature gem that many San Franciscans know about and revere, but frequently choose not to publicize for fear of the Reserve becoming too popular and therefore rundown or crowded.

For me, Mount Sutro is a place I look at daily from my living room windows and back porch. It's a majestic hill I watch the sun set behind and a place that boasts great wildlife, the lovely aroma of eucalyptus and clean, healthy air. I also stare in wonder at the mini ecosystem that resides on that mountain; I'll often see clouds and fog take shape and form right before my eyes within the unique cloud forest of Mount Sutro where elsewhere it's sunny. In short, we're lucky to have an incredibly unique natural area in such a dense urban environment and Mount Sutro provides a sense of beauty, seclusion and tranquility in an otherwise hectic environment that exists right outside the property line.

In addition to sheer beauty, Mount Sutro also gives a great deal back to San Francisco and the climate at large acting as a carbon sink within the city. To quote the Draft EIR: "A total of 38,918 tons of CO<sub>2</sub>e (35,306 metric tons of CO<sub>2</sub>e), or 639 tons per acre of CO<sub>2</sub>e (579 metric tons of CO<sub>2</sub>e per acre), is sequestered in the above-ground live and dead tree biomass of the Mount Sutro Open Space Reserve. Of this, approximately 98.76% is sequestered in the Reserve's live blue-gum eucalyptus trees." This is an impressive number that we, both as a city and as a collective community, should be proud of, particularly in this age of climate change. I would like to see this figure monetized before anything is done with respect to clearing the forest, specifically with respect to how much Mount Sutro Open Space Reserve saves the city of San Francisco in climate change mitigation costs each year. This would be a very interesting figure indeed and one the city may be interested in, if they aren't already aware.

In addition, California State AB32, the Global Warming Solution Act states: "(f) In developing its plan, the state board shall identify opportunities for emission reductions measures from all verifiable and enforceable voluntary actions, including, but not limited to, carbon sequestration projects and best management practices." Valuing Mount Sutro as a carbon sink is likely enough reason alone to keep the forest as-is and in tact. In a world facing the dire impacts of climate change, what we need more than anything are dense forests to help absorb excess carbon and replenish our air supply, both locally and globally.

Furthermore, Mount Sutro Open Space Reserve acts as a significant habitat for wildlife, including many birds such as the Great Horned owl, in addition to bees, coyotes and insects. Surely these creatures, who have lived in San Francisco for many years, some well beyond human inhabitation, deserve to call the city home just as much as any "native species." In fact, I believe it to be discriminatory to determine what species should and should not continue to survive, particularly when it involves killing off one species to resurrect another, under a so-called "native" restoration plan. This model is essentially what the Natural Areas program, a city-wide plan that UCSF has consulted, proposes and I am unconvinced that this proposal makes any sense. Particularly, what is "native" in an urban environment? I'd like this explained more clearly. Can an environment that hasn't been a natural area for hundreds of years actually be restored? And to what exactly? To what the land was pre-human development? And this "restoration" will be achieved by using noxious chemicals and pesticides within close proximity to city residents and wildlife? Why can't the city and UCSF instead maintain a balance between a managed, forested area, like Mount Sutro Open Space Reserve, and other areas that are "native" without outright destroying what exists today? Please consult: <http://www.thenakedscientists.com/HTML/articles/article/reconsidering-non-native-species/>.

While I am by no means against trying to maintain an ecosystem with flourishing wildlife and believe it would be wonderful to bring back certain species on the brink of extinction (one focus of the Native Areas plan), San Francisco has been a dense urban environment for quite some time and Mount Sutro in particular has been the way it is currently for well over 100 years. The ecosystem that exists today within the mountain has adapted as such and has become home to countless creatures that call it home. Who are we to deny their existence in place of something more "native"? This is a subjective value-based question. Eucalyptus, a tree often resented by "naturalists" in the city, also does not make the USDA list of invasive and noxious plants in California: <http://plants.usda.gov/java/noxious?rptType=State&statefips=06> and have many positive qualities that should be considered before mass eradication occurs. See: <http://sutroforest.com/eucalyptus-myths/>.

As previously mentioned, what I strongly do not agree with under the Natural Areas plan is the use of harmful chemicals and

pesticides on a massive level to "restore" natural areas in San Francisco to their "original" states. How is it justifiable to spray noxious pesticides in the name of natural restoration, especially within such a dense urban environment? That, to me, is quite the paradox and such a viewpoint is inherently dangerous and flawed. See: <http://sutroforest.com/2013/01/24/sfs-natural-areas-program-uses-even-more-pesticides/>

Regarding the fire hazard debate, few cloud forests or rain forests are as likely to spontaneously ignite into a fire as dry grassland, which is a more native California environment and an environment that is proposed returning to by the Native Areas plan. By thinning and therefore clearing Mount Sutro, you are inherently removing the cloud forest thereby remodeling the entire ecosystem into something, ironically, that is more likely to ignite. "Catastrophic fire is a relatively rare event in most rainforests which are devoid of humans (in contrast to temperate forests). In Amazonia, for example, natural major fires occur in any given area approximately every 440-1550 years. This is so because, where there is a closed canopy forest, fires are inhibited by the humidity, which often reaches 65% and more." (<http://www.rainforestconservation.org/rainforest-primer/rainforest-primer-table-of-contents/g-rainforest-ecology/13-rainforest-stability-and-disturbance>)

Last, but surely not least, a recent popular article in the Atlantic cited that "when trees die, people die" (<http://www.theatlantic.com/health/print/2013/01/when-trees-die-people-die/267322/>). While this may sound extreme, the article makes sound scientific and psychological correlations that are worth taking seriously. I recommend you do the same before moving forward with such a controversial, costly and unnecessary plan as outlined in the Draft EIR, a plan that could permanently destroy such a unique and glorious asset to the city of San Francisco and its residents.

Thank you for your time and consideration.

Tara M. Holmes  
San Francisco, CA

Following are observations and suggestions are based on my cursory overview of the Draft EIR. I plan to attend the meeting on February 25<sup>th</sup>. If you have questions before then, please feel free to contact me. You may use this as part of your DEIR response package if you think it will be helpful.

### **Herbicide Observations:**

1. Garlon 4 Ultra does not specify Eucalyptus as being controlled.
2. Aquamaster (glyphosate) is noted as controlling Eucalyptus. Perhaps you should include it as part of your stump treatment protocol.
3. There is a note that these two herbicides may be tank mixed (i.e. Garlon 4), therefore, Garlon 4 Ultra is probably also compatible. This can extend efficacy in some cases.
4. General wording: Give yourselves the latitude to use either material or tank mix as the circumstances dictate. Furthermore, you might wish to have a general note that allows you to use other products of similar formulation and ratings based on the active ingredients and adjuvants/surfactants.
5. You might also wish to make a management note as to the interval between application and when you may use grazing to resume as a management tool.

### **Habitat Management**

1. Grazing/mowing/mechanical brush/fuel reduction
  - a. Pattern of work
    - i. Establish a practice of herding mobile organisms (amphibians, rodents, etc.) away from sensitive areas (neighbors, housing, and other facilities) and towards a sanctuary to avoid trapping them in the middle of the area to be cleared or into adjacent properties.
    - ii. Note: Any disrupted habitat will take time to stabilize to a new dynamic balance.
  - b. Using Goats for initial clearing of area will bring hazards to equipment and personnel into plan view;
    - i. it will also reduce herbicide use.
    - ii. The modified habitat will encourage/force mobile organisms to establish/relocate to adjacent area more readily in my opinion.
    - iii. If goats are pre-fed on “Clean” hay/feed for several days prior to and supplemented with “Clean” feed when necessary, there will be less chance of them introducing new weed species into the area.
  - c. Also, it is important, from my experience, to move them before they have completely denuded the area, a rough target would be 90% reduction in targeted vegetation. This will minimize damage to desirable species, i.e. local ferns and the bark of woody plants you intend to keep.
  - d. My preference for grazing would be late March to Early June.
    - i. This allows for regrowth of foundation groundcovers to reduce erosion in the Fall.
    - ii. Also, regrowth is easier to manage with herbicides when necessary, requiring less material, etc.
  - e. Brontosaurus Brush/Tree Mulcher – It is my hope, that you will use the Brontosaurus on a long boom to minimize compaction and soil disturbance. It also allows you to mulch down small trees. With the lower vegetation reduced by goats this presents many positives to me.

2. Habitat modification to preclude accumulation of water in depressions:
  - a. I feel that this may reduce available habitat for the species you are trying to conserve.
  - b. Your herbicide selection and use strategies should protect them adequately, particularly if you are applying them after the typical rainy season and discontinuing their use by the end of August.
3. Plant Back Species of trees:
  - a. ***Please do not use California Bay Laurel – especially since you are planning to use oaks! This increases the likelihood that you will have Sudden Oak Death issues.***
  - b. Although most of us have a special place in our hearts for redwoods, I don't think that this very thirsty species should be planted.
  - c. Monterey Cypress should be used judiciously – perhaps on the western and south western sides of the forest only. This would be your “windbreak”.
  - d. If part of the goal is to re-establish a more “Natural” vegetation pattern with supplemental water only during the establishment phase, I suggest targeting the North, and East drainages for your trees. Followed by drainage systems on other exposures that afford some shelter for establishing trees. As the area matures, naturalizing tree species such as oaks will move up slopes towards the ridge.
  - e. As part of your experiments in management practices you might try the following:
    - i. Using tree shelters (there are many to choose from) you could establish oaks in the following ways:
      1. From acorns – the shelters reduce herbivore from squirrels and other vertebrates.
      2. From EZ start and/or one gallon cans w/shelters
      3. Some 5 and 15 gallon trees (just a few)
      4. Field grown trees – Oracle Oak Nursery is one that can contract grow these for you and may be able to supply additional specimens and/or acorns.
    - ii. Soil Tests – This will help establish a baseline for plant nutrition and can help you anticipate disease and pest issues in your different management zones/exposures.
    - iii. Measure plant responses based on the depth of mulch. Deep mulches can have an adverse effect on plant performance and longevity. Also if the mulches are too shallow, soil and water retention may be adversely impacted.
    - iv. To help with all this monitoring and project management, it might be beneficial to encourage Graduate students in Urban Forestry, Arboriculture, and Park Management to consider being part of the process.
    - v. Transitional Edges –
      1. The windward edge of the open space (South/Southwest) looks the worse for wear, as is typical, and should possibly be left alone as the primary wind barrier during the establishment of the “restoration” work.
      2. Expanding Rotary Native Plant Garden devoid of Eucalyptus.
    - vi. As part of your testing, you should evaluate the establishment of replacement species, i.e. Oaks in open ground, nursed by shrubs, and beneath the canopy of Eucalyptus. Note: The later removal cost of the over-story should also be evaluated.
4. Notes on page 2-5 Continued Implementation
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  - c. #4 East Bowl Corridor Plants – consider using these trees as your core planting while omitting (Bay Trees and Redwoods), I'm not sold on willows either.
    - i. Oak
    - ii. Buckeye
    - iii. Madrone – perhaps (these are best started on-site from seed in shelters) expect high mortality rates until you find the right niche.

- d.* Goat Grazing – Consider having a small herd of five to seven ewes that work year round, three to five days per week with a shepherd and working dog. They could:
  - i.* Keep trail corridors clear
  - ii.* Manage resprouts and
  - iii.* Manage overall vegetation densities with reduced labor and chemicals

The preceding comments represent my initial thoughts. I may send more observations in the future.

Sincerely,

Robert Scudder  
Arborist and PCA # 074336

Note these are my personal comments on this project and do not represent official recommendations as an arborist or PCA.

[rsscudder@pacbell.net](mailto:rsscudder@pacbell.net)

415-317-5493 cell

415-753-8419 home

To Diane Wong

Notes and reflections following the public comment meeting regarding the Draft EIR for Mt. Sutro at UCSF on February 25, 2013.

My thanks to UCSF staff for conducting a well run comment session with ample opportunities for those present to opt-in to expressing their concerns and/or support before all those present. The Draft EIR, in my opinion, goes a long way towards developing the architecture/framework within which the forest may be managed effectively. It also establishes a process to develop and identify tools that may be used to implement specific management activities to achieve a wide range of diverse goals. It is my feeling that the “Framework” and an ongoing process of management tool development, need to be further defined and somewhat open ended so that new information can be incorporated into the management program without having to go through an expensive new EIR/CEQA process. Once this process is complete, I hope that you will be able to manage the forest for the next 50-100 years without having to repeat this management planning process. It is time for implementation.

From the meeting, I came away with these two core “thoughts” or concepts: Maintenance and Communication (Interpretation). It seemed that the majority of the people there accepted the reality that maintenance is part of any urban forest setting. They diverged, however, on the amount and type of maintenance that should be done. The largest fear was that you would make dramatic changes over the next four to five years. This is a “Long Term” management plan and it is okay to establish a routine moderately paced program with smaller renovation projects. The temptation when large equipment is to be used, is to just “get it done”. That is to thin 10-12 acres a year (your max per DEIR). However, it might be better to remove weak trees and selected dead hazard trees (with a significant target) while leaving others for habitat and remove a few others that are adversely impacting larger trees or vice-versa (forest crown reduction by removing larger trees in favor of smaller ones may in some areas be more appropriate), and not be too rigid about your 30 to 60 foot spacing. Some areas may lend themselves to closer or greater spacing depending on a myriad of topographic and tree growth factors. Be flexible and dynamic in your application of your management tools. We are, after all, in this for the long-haul.

Requests for a continued flow of information about the proposed management/maintenance plan for Mt. Sutro provides a wonderful opportunity for educating everyone involved in the direct management of the forest, the general public and students about urban green space management. Through cooperative programs with UC Cooperative Extension, San Francisco State University, University of San Francisco, UC Berkeley, UC Davis, and perhaps the Academy of Sciences Golden Gate Park, quantitative research and interpretive programs could be carried out. Such programs could show the success of renovation/management strategies in comparison to reproductive success rates in “un-managed” habitats, etc. To interpret/communicate the results of various studies and on-going management strategies, a number of opportunities present themselves. First, a self-guided walk through the study sites and/or along the trails could explain/present the management goals and concepts as has been done at a native plant restoration site near the Southwest end of the Presidio. Second, a volunteer docent program could be developed to take individuals and/or groups through these areas on a regular basis. And last, an annual or biennial tour might be given by staff for interested parties. I personally prefer the first two options as the most productive and least costly. As a side note, the docent program might be coordinated through the Academy of Sciences. The side benefit of qualitative and quantitative research is that they give scientific bench marks to gauge the success of various strategies and as a reference base for other urban/suburban managers to make better decisions in their own settings.

Concerns about the management/maintenance plan covered a wide range of possibilities. Excluding the extremes, (don’t touch anything and cut it all down (personal communication)), a moderate implementation plan should be able to satisfy most of those in the middle. To that end, here are a few key items to consider for your maintenance/management Tool Box:

1. Trail use Guidelines – Focus on minimizing conflicts between users
  - a. Of special concern are incidents between cyclists and hikers. My neighbors have barely avoided injury twice while using the interior greenbelt and UCSF trails, nearly being crashed into by cyclist charging down the trail around blind curves. Will the third time be “the charm” with three or more people injured? My suggestion is that these trails be for hikers only and dog walkers using leashes. On the whole these trails are not wide enough or remote enough to accommodate both.
  - b. Furthermore, I feel that bicycles have an adverse effect on trail quality and maintenance.
2. It’s okay to conserve non-native naturalized species for aesthetics, to reduce erosion potential, and to serve as the replacement species for larger Eucalyptus. The key to the management of Mt. Sutro is to encourage a greater diversity of species and devise cost effective management tools to afford a “safe” and pleasant place for students, staff, and the public to recreate and for many other species to call home.
3. The need to manage resident and guest vertebrate species will become a necessary part of your program as the carrying capacity of the Open Space and Interior Greenbelt is approached by any given species that now or in the future may call it home. Methods of assessment and management options need to be developed to take action before there are conflicts with humans within and/or adjacent to the reserve. This may involve –
  - a. Creating opportunities for internal self regulation by habitat manipulation so that resident predators may have a higher success rate. This may be achieved by managing vegetative cover, density, and spacing.
  - b. The possibility of a need to trap selected species for euthanasia or inclusion in a zoo type situation. It is not prudent or in most cases legal to transplant vertebrate species to another location.
  - c. We must sometimes play/exercise our role as top predator/manager to keep the dynamic balance in the reserve from experiencing population explosions and/or collapse.
4. Tree assessment tools
  - a. In conjunction with your arborist, an awareness of the known/recorded failure dynamics of various tree species is important, especially Eucalyptus, to form good management practices and to communicate effectively with concerned parties. To that end I refer you to the California Tree Failure Report Program data base. They can help you assemble data for specific species – i.e. Blue Gum Euc – a sample of the type of data available is at the end along with contact information.
5. Mulch management – Depth of mulch matters! In my experience, mulches exceeding 1-2 inches in depth can cause problems especially with new plantings and stressed established plants. The impacts include:
  - a. Poor rooting out in non-irrigated areas when rain events are not sufficient to penetrate deep mulches to reach the soil. In deep mulches the soil beneath often stays dry.
  - b. Significant surface rooting between the soil and mulch layer – this can have adverse effects during drought times as there are fewer roots in the soil where they can take advantage of the water reservoir, especially in clay and clay/loam soils.

Attached here is my first email contents to minimize redundancy.

Following are observations and suggestions are based on my cursory overview of the Draft EIR. I plan to attend the meeting on February 25<sup>th</sup>. If you have questions before then, please feel free to contact me. You may use this as part of your DEIR response package if you think it will be helpful.



## Herbicide Observations:

1. Garlon 4 Ultra does not specify Eucalyptus as being controlled.
2. Aquamaster (glyphosate) is noted as controlling Eucalyptus. Perhaps you should include it as part of your stump treatment protocol.
3. There is a note that these two herbicides may be tank mixed (i.e. Garlon 4), therefore, Garlon 4 Ultra is probably also compatible. This can extend efficacy in some cases.
4. General wording: Give yourselves the latitude to use either material or tank mix as the circumstances dictate. Furthermore, you might wish to have a general note that allows you to use other products of similar formulation and ratings based on the active ingredients and adjuvants/surfactants.
5. You might also wish to make a management note as to the interval between application and when you may use grazing to resume as a management tool.

## Habitat Management

1. Grazing/mowing/mechanical brush/fuel reduction
  - a. Pattern of work
    - i. Establish a practice of herding mobile organisms (amphibians, rodents, etc.) away from sensitive areas (neighbors, housing, and other facilities) and towards a sanctuary to avoid trapping them in the middle of the area to be cleared or into adjacent properties.
    - ii. Note: Any disrupted habitat will take time to stabilize to a new dynamic balance.
  - b. Using Goats for initial clearing of area will bring hazards to equipment and personnel into plan view;
    - i. it will also reduce herbicide use.
    - ii. The modified habitat will encourage/force mobile organisms to establish/relocate to adjacent area more readily in my opinion.
    - iii. If goats are pre-fed on “Clean” hay/feed for several days prior to and supplemented with “Clean” feed when necessary, there will be less chance of them introducing new weed species into the area.
  - c. Also, it is important, from my experience, to move them before they have completely denuded the area, a rough target would be 90% reduction in targeted vegetation. This will minimize damage to desirable species, i.e. local ferns and the bark of woody plants you intend to keep.
  - d. My preference for grazing would be late March to Early June.
    - i. This allows for regrowth of foundation groundcovers to reduce erosion in the Fall.
    - ii. Also, regrowth is easier to manage with herbicides when necessary, requiring less material, etc.
  - e. Brontosaurus Brush/Tree Mulcher – It is my hope, that you will use the Brontosaurus on a long boom to minimize compaction and soil disturbance. It also allows you to mulch down small trees. With the lower vegetation reduced by goats this presents many positives to me.
2. Habitat modification to preclude accumulation of water in depressions:
  - a. I feel that this may reduce available habitat for the species you are trying to conserve.
  - b. Your herbicide selection and use strategies should protect them adequately, particularly if you are applying them after the typical rainy season and discontinuing their use by the end of August.
3. Plant Back Species of trees:
  - a. ***Please do not use California Bay Laurel – especially since you are planning to use oaks! This increases the likelihood that you will have Sudden Oak Death issues.***
  - b. Although most of us have a special place in our hearts for redwoods, I don’t think that this very thirsty species should be planted.
  - c. Monterey Cypress should be used judiciously – perhaps on the western and south western sides of the forest only. This would be your “windbreak”.

- d.* If part of the goal is to re-establish a more “Natural” vegetation pattern with supplemental water only during the establishment phase, I suggest targeting the North, and East drainages for your trees. Followed by drainage systems on other exposures that afford some shelter for establishing trees. As the area matures, naturalizing tree species such as oaks will move up slopes towards the ridge.
- e.* As part of your experiments in management practices you might try the following:
  - i.* Using tree shelters (there are many to choose from) you could establish oaks in the following ways:
    - 1. From acorns – the shelters reduce herbivore from squirrels and other vertebrates.
    - 2. From EZ start and/or one gallon cans w/shelters
    - 3. Some 5 and 15 gallon trees (just a few)
    - 4. Field grown trees – Oracle Oak Nursery is one that can contract grow these for you and may be able to supply additional specimens and/or acorns.
  - ii.* Soil Tests – This will help establish a baseline for plant nutrition and can help you anticipate disease and pest issues in your different management zones/exposures.
  - iii.* Measure plant responses based on the depth of mulch. Deep mulches can have an adverse effect on plant performance and longevity. Also if the mulches are too shallow, soil and water retention may be adversely impacted.
  - iv.* To help with all this monitoring and project management, it might be beneficial to encourage Graduate students in Urban Forestry, Arboriculture, and Park Management to consider being part of the process.
  - v.* Transitional Edges –
    - 1. The windward edge of the open space (South/Southwest) looks the worse for wear, as is typical, and should possibly be left alone as the primary wind barrier during the establishment of the “restoration” work.
    - 2. Expanding Rotary Native Plant Garden devoid of Eucalyptus.
  - vi.* As part of your testing, you should evaluate the establishment of replacement species, i.e. Oaks in open ground, nursed by shrubs, and beneath the canopy of Eucalyptus. Note: The later removal cost of the over-story should also be evaluated.

#### 4. Notes on page 2-5 Continued Implementation

- a.* Views – looking through trees to distant views is also valid. A view over the top of trees is not always necessary or desirable.
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- c.* #4 East Bowl Corridor Plants – consider using these trees as your core planting while omitting (Bay Trees and Redwoods), I’m not sold on willows either.
  - i.* Oak
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- d.* Goat Grazing – Consider having a small herd of five to seven ewes that work year round, three to five days per week with a shepherd and working dog. They could:
  - i.* Keep trail corridors clear
  - ii.* Manage resprouts and
  - iii.* Manage overall vegetation densities with reduced labor and chemicals

## Appendix I

### California Tree Failure Report Program (CTFRP)

<http://ucanr.org/sites/treefail>

#### Overview of Tree failures being reported

From E-Newsletter February 28, 2013

For species specific information contact

Katherine Jones: [treefail@mac.com](mailto:treefail@mac.com)

Species	DBH (inches)	Mean Age at failure (years)	Mean Height at failure (feet)
Quercus agrifolia	32	89	48
Quercus lobata	45	155	63
Other Oaks	26	106	57
<b>Eucalyptus (all)</b>	<b>32</b>	<b>47</b>	<b>63</b>
Other hardwoods (not oak or Euc.)	20	34	38
Cupressus macrocarpa	40	66	68
Pinus radiata	32	59	70
Other pines	26	46	57
Other conifers (not pine or Monterey cypress)	31	60	72

## Appendix II – Additional Resources

1. Contract Oak Nurseries – short list
  - a. Oracle Oak Nursery, Hopland, Mendocino County, CA.
    - i. 415-225-5567
    - ii. [www.oracleoaknursery.com](http://www.oracleoaknursery.com)
  - b. Specialty Oaks Inc., 16193 Main Lower Lake, CA
    - i. 707-995-2275
    - ii. [www.specialtyoaks.com](http://www.specialtyoaks.com)
2. Consulting Arborists – short list
  - a. ASCA – American Society of Consulting Arborists
    - i. [www.asca-consultants.org](http://www.asca-consultants.org)
  - b. Joseph McNeil Consulting Arborist
    - i. 925-676-5232
    - ii. [www.oakperson.com](http://www.oakperson.com)
  - c. Hort Science
    - i. 925-484-0211
    - ii. [www.hortscience.com](http://www.hortscience.com)

It is my hope that these comments and resources will help you develop broader perspectives in your management framework and augment your implementation toolbox. Thank you for the opportunity to provide some input.

Sincerely,

Robert Scudder

Arborist and PCA # 074336

Note these are my personal comments on this project and do not represent official recommendations as an arborist or PCA.

[rsscudder@pacbell.net](mailto:rsscudder@pacbell.net)

415-317-5493 cell

415-753-8419 home

**From:** [Lori Anderson](#)  
**To:** [Campus Planning - EIR](#)  
**Subject:** Save Sutro Forest  
**Date:** Saturday, February 16, 2013 4:03:15 PM

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Diane Wong,

I am completely against UCSF'S plans of destroying Sutro Forest, by removing 30,000 trees that have been living and thriving there for over 100 years. These trees and plants to SF residents are native! I have several issues with this plan. We rely on those 100 plus year old trees and plants for water shed that they provide, wind barrier, hillside integrity and wildlife habitat. In addition, I have great concern with the use of pesticides or other chemicals that will impact our air quality and entering into the water shed poisoning our soil in this neighborhood.

Lori Anderson  
591 Oak Park Drive  
SF CA 94131

**From:** [hushabye@earthlink.net](mailto:hushabye@earthlink.net)  
**To:** [Campus Planning - EIR](#)  
**Subject:** Against plan to clear cut Mount Sutro Forest  
**Date:** Saturday, February 16, 2013 1:46:45 PM

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How sad that UCSF is on-board with NAP to destroy an unique ecosystem in San Francisco. Not only is this grove a piece of green beauty in a city filled with concrete, but it is home to over 30 species of birds-including red-tailed hawks, a federally protected raptor. This patch of forest is a place to hike, walk or bike. I guess it doesn't matter that most of the wildlife living there will be killed if this plan goes forward.

There is already a native plant garden at the top of the mountain where people can be shown what the native plantings were like if they are interested. Leave the rest of this 100-year-old forest alone.

Sincerely,  
Patricia Mattox  
505 Oak Park Drive  
San Francisco CA 94131

**From:** [Jack Thompson](#)  
**To:** [Campus Planning - EIR](#)  
**Subject:** Chemicals on Mount Sutro  
**Date:** Saturday, February 16, 2013 4:54:36 PM

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Dear Diane Wong, UCSF Environmental Coordinator,

I have recently become aware of your plan to spray toxic chemicals for a variety of purposes, above my home during your planned deforestation of Mount Sutro. Perhaps no one has taken the time to point out that the trees on the hillside provide a significant water shed for the entire neighborhood, water does flow down hill after all.

We will be performing water quality testing of our aquifer on our property and any introduction chemical toxins will result in a class action suit against UCSF.

I am appalled that UCSF would risk it's continued existence on something with minimal benefits a best.

Sincerely  
Your neighbor in Forest Hills  
Jack Thompson

February 17, 2013

Ms. Diane Wong  
UCSF Campus Planning  
Box 0286  
San Francisco, CA 94143-0286

Dear Ms. Wong:

I am writing in opposition to the proposed UCSF Mount Sutro Management Project. After reading the draft EIR, I find little valid reason to remove mature trees and naturalized plantings throughout the area.

The thrust of the project, as I understand it, is to remove trees from the reserve in order to achieve a reduction of 740 trees per acre to approximately 50 trees per acre. In doing so, existing vegetation will be removed along with underplantings, natural thatch and existing habitats for animals. The main objectives are to provide an environment safer from forest fire and a healthier forest.

As you know, the forest was planted on a virtually bare mountainside over 100 years ago. The tree selection, although not "native," has proved to be a robust and sustainable choice. The claim that the forest is not healthy holds no merit. In fact, trees have grown to over 200 feet and there is an abundance of notable plant and wildlife.

Further, the concern that the current forest poses a risk of forest fire is also unproven. The citing in the EIR of similar hazard environments in the area lack any mention of the same micro-climate that occurs on Mount Sutro. The areas undisturbed by "management" remain moist and verdant throughout the year. Only those areas, such as the summit, where mankind has created an unnatural environment pose any risk at all.

I reside just below the reserve and walk the trails almost every day. It is a truly beautiful wilderness located in the middle of a major urban environment. I cannot imagine anything that you could do to improve this. On the contrary, I can image the damage that scores of workers tromping through the undergrowth removing mature trees and plants, spreading herbicide and tarps, disrupting animal habitats and exposing the area to increased noise, wind and soil erosion would do.

I urge you and your colleagues at UCSF Campus Planning to focus your efforts and scant resources to other, more urgent and worthy endeavors.

Thank you for your kind consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael D. Hirsch', with a long horizontal line extending to the right.

Michael D. Hirsch  
531 Oak Park Drive  
San Francisco, CA 94131

Cc Ms. Marsha Kelman  
Secretary and Chief of Staff to the Regents



From: [Daniel Santi](#)  
To: [Campus Planning - EIR](#)  
Subject: are you aware of the toxicity of Garlon?  
Date: Sunday, February 17, 2013 8:52:50 PM  
Attachments: [triclopyr.pdf](#)

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Daniel Santi, M.D., Ph.D.  
211 Belgrave Ave.  
San Francisco, CA 94117  
Cell 415 533 5775  
Home 415 665 5775  
[Daniel.V.Santi@gmail.com](mailto:Daniel.V.Santi@gmail.com)  
[Daniel.Santi@ucsf.edu](mailto:Daniel.Santi@ucsf.edu) (alternate email)

## ● HERBICIDE FACTSHEET

# TRICLOPYR

Triclopyr is a broadleaf herbicide used primarily on pastures, woodlands, and rights of way. Garlon 3A and Garlon 4 are brand names of common triclopyr herbicides. Two forms of triclopyr are used as herbicides: the triethylamine salt (found in Garlon 3A) and the butoxyethyl ester (found in Garlon 4).

The amine salt of triclopyr is corrosive to eyes. Both the amine salt and the ester are sensitizers and can cause allergic skin reactions.

In laboratory tests, triclopyr caused an increase in the incidence of breast cancer as well as an increase in a type of genetic damage called dominant lethal mutations. Triclopyr also is damaging to kidneys and has caused a variety of reproductive problems.

The ester form of triclopyr is highly toxic to fish and inhibits behaviors in frogs that help them avoid predators. Feeding triclopyr to birds decreases the survival of their nestlings.

Triclopyr inhibits the growth of mycorrhizal fungi, beneficial fungi that increase plants' ability to take up nutrients. Triclopyr also interferes with one step in the process by which atmospheric nitrogen is transformed by microorganisms into a form that is usable by plants.

Triclopyr is mobile in soil and has contaminated wells, streams, and rivers. Contaminated water has been found near areas where triclopyr is used in agriculture, in forestry, on urban landscapes, and on golf courses.

The major breakdown product of triclopyr (3,5,6-trichloro-2-pyridinol) disrupts the normal growth and development of the nervous system. In laboratory tests, it also accumulates in fetal brains when pregnant animals are exposed.

BY CAROLINE COX

**T**riclopyr is a selective herbicide used to kill unwanted broadleaf plants. Triclopyr herbicides contain one of two forms of triclopyr, either the triethylamine salt or the butoxyethyl ester. (See Figure 1.) Triclopyr was first registered as a pesticide in the U.S. in 1979 and its major manufacturer is Dow AgroSciences.<sup>1</sup> It is sold under a variety of trade names, including Garlon 3A,<sup>2</sup> Garlon 4,<sup>3</sup> Pathfinder,<sup>4</sup> Remedy,<sup>5</sup> Turflon,<sup>6</sup> and (in Canada) Release.<sup>7</sup> Garlon 3A contains the triethylamine salt, the others contain the butoxyethyl ester.<sup>2-7</sup> Triclopyr is in the carboxylic acid chemical family.<sup>8</sup>

## Use

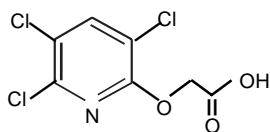
According to estimates from the U.S.

Environmental Protection Agency (EPA), use of triclopyr in the U.S. totals almost 700,000 pounds per year.<sup>9</sup> Pastures, woodlands, and rights of way account for

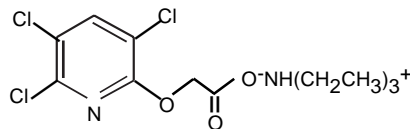
almost three-quarters of this use while rice is the major agricultural use.<sup>9</sup> An estimated 455,000 applications are made annually to U.S. lawns and yards.<sup>10</sup>

Caroline Cox is NCAP's staff scientist.

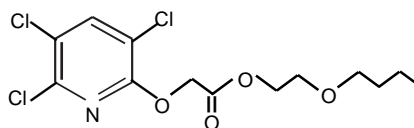
Figure 1  
Triclopyr, Its Triethylamine Salt, and Its Butoxyethyl Ester



*triclopyr*  
*((3,5,6-trichloro-2-pyridinyl)oxy)acetic acid*



*triethylamine salt of triclopyr*



*butoxyethyl ester of triclopyr*

## How Does Triclopyr Kill Plants?

Triclopyr imitates a plant hormone called indoleacetic acid, one of a number of plant hormones classified as auxins. Triclopyr causes the growing tips of the plant to elongate, followed by distortion, withering, and the death of the plant.<sup>8</sup>

Triclopyr is selective (most toxic to broadleaf plants) because grasses are quickly able to transform triclopyr into compounds that do not have hormonal activity.<sup>11</sup>

## "Inert" Ingredients in Triclopyr-Containing Products

According to U.S. pesticide law, any ingredients in triclopyr herbicides other than triclopyr are called "inert."<sup>12</sup> Except for acute toxicity testing, all toxicology tests required for registration as a pesticide were conducted with triclopyr, not the combination of ingredients found in commercial products.<sup>13</sup> "Inert" ingredients used in triclopyr herbicides include the amine salt of dodecylbenzenesulfonic acid<sup>14</sup>, ethanol,<sup>2</sup> ethylenediamine tetraacetic acid,<sup>2</sup> a petroleum solvent<sup>14</sup> containing kerosene,<sup>3,5-7</sup> polyglycol,<sup>15</sup> ethoxylated sorbitan monooleate,<sup>14</sup> and triethylamine.<sup>2</sup> See "Hazards of Inerts in Triclopyr Products," right, for more information.

## Acute Toxicity

Symptoms of short-term exposure to triclopyr include lethargy incoordination, weakness, difficult breathing, and tremors. Anorexia and diarrhea have also been observed in animals exposed to triclopyr.<sup>16</sup>

EPA classifies the triethylamine salt of triclopyr in the agency's highest acute toxicity category for eye irritation. It is "corrosive" to eyes with damage lasting over three weeks. Both the amine salt and the butoxyethyl ester sensitize skin,<sup>17</sup> so that subsequent exposures cause greater allergic reactions than the first exposure.<sup>18</sup>

## Subchronic Toxicity

In a subchronic (medium-term, 3 month) laboratory feeding study with rats,

triclopyr caused kidney damage (degeneration of tubules). This damage was observed at doses of 20 milligrams per kilogram (mg/kg) of body weight per day.<sup>19</sup>

There are no publicly available subchronic toxicity studies of commercial triclopyr-containing products.

## Chronic Toxicity

In a chronic (long-term) laboratory feeding study, rats fed triclopyr developed kidney damage more often than unexposed rats. In a long-term study using dogs, the animals which were fed triclopyr gained less weight, had less hemoglobin (oxygen-carrying molecules) and red blood cells in their blood, and had more microscopic liver damage than did unex-

posed dogs. These symptoms were observed at doses of 25 mg/kg per day in the rat study and 20 mg/kg per day in the dog study.<sup>20</sup>

A dog study which showed kidney effects at a tenfold lower dose (2.5 mg/kg per day) was originally used by EPA to calculate acceptable exposure to triclopyr.<sup>21</sup> However, this calculation was criticized by triclopyr's manufacturer because of studies the company conducted showing that triclopyr is more slowly excreted by dogs than other animals, and that the dog kidney is more susceptible than the kidney of other animals.<sup>22,23</sup> As a result, EPA classified the kidney damage as "not a toxic response to the test chemical, but a physiologic response of

# HAZARDS OF INERTS IN TRICLOPYR PRODUCTS

Health hazards of inerts used in triclopyr herbicides include the following:

**Ethoxylated sorbitan monooleate** has caused a drop in blood pressure in dogs given the compound for research purposes. It also has caused adrenal gland tumors in laboratory tests of male rats.<sup>1</sup>

**Ethylenediamine tetraacetic acid** causes eye and skin irritation and is also irritating to the upper respiratory tract.<sup>2</sup> In laboratory tests with rats, it caused a variety of birth defects: cleft palate, eye defects, and abnormal skeletons.<sup>3</sup>

**Kerosene** causes severe eye irritation and is also irritating to the upper respiratory tract. Inhalation of kerosene causes fatigue, headache, dizziness, and incoordination.<sup>4</sup> Other symptoms include euphoria, a burning sensation, disorientation, and drowsiness.<sup>5</sup>

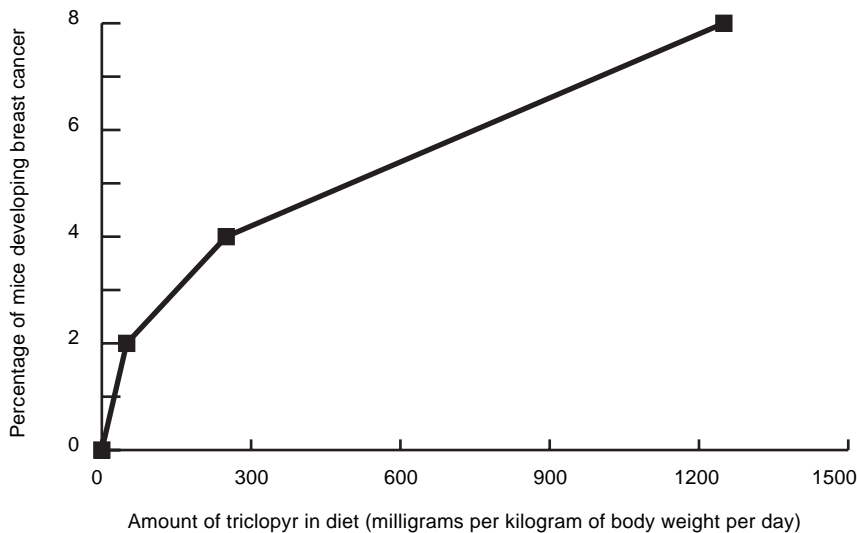
**Petroleum solvent** (with Chemical Abstracts Service registry number 64742-48-9) is damaging to kidneys and to the nervous system. These effects have been demonstrated in both

exposed workers and laboratory tests. Some neurological effects are long-lasting or irreversible.<sup>6</sup>

**Triethylamine** is damaging to eyes and can cause abnormal vision<sup>7</sup> and irreversible damage.<sup>8</sup> It is extremely destructive to skin and the upper respiratory tract. Symptoms of exposure include coughing, wheezing, headache, and nausea.<sup>8</sup>

1. National Library of Medicine. Hazardous Substances Data Bank. 2000. Glycol (Polysorbate 80). <http://toxnet.nlm.nih.gov>. Retrieved Nov. 13.
2. Sigma Chemical Co. 2000. Material safety data sheet: Ethylenediaminetetraacetic acid. St. Louis, MO. <http://info.sial.com>.
3. National Library of Medicine. Hazardous Substance Data Bank. 2000. Ethylenediamine tetraacetic acid. <http://toxnet.nlm.nih.gov>. Retrieved Nov. 13.
4. Sigma Chemical Co. 2000. Material safety data sheet: Kerosene. St. Louis, MO. <http://info.sial.com>.
5. National Library of Medicine. Hazardous Substances Data Bank. 2000. Kerosene. <http://toxnet.nlm.nih.gov>. Retrieved Nov. 13.
6. United Nations Environment Prog. et al. 1996. White spirit (Stoddard Solvent). Environmental Health Criteria 187. Geneva, Switzerland: World Health Organization. Pp.73-75, 77-78, 90-128.
7. U.S. EPA. Integrated Risk Information System. 1993. Triethylamine. [www.epa.gov/iris](http://www.epa.gov/iris).
8. Sigma Chemical Co. 2000. Material safety data sheet: Triethylamine. St. Louis, MO. <http://info.sial.com>.

Figure 2  
Triclopyr and Breast Cancer



Source: U.S. EPA. Office of Prevention, Pesticides, and Toxic Substances. 1996. Carcinogenicity peer review of triclopyr. Memo from McMahon, T.F., and E. Rinde, Health Effects Div., to R. Taylor, Registration Div. and T. Luminello, Special Review and Reregistration Div. Washington, D.C., May 9.

In laboratory studies with both mice and rats, triclopyr caused a significant increase in the incidence of breast cancer. However, EPA's evaluation of these studies concluded that it was not possible to classify triclopyr's ability to cause cancer.

the dog"<sup>24</sup> and did not use the results in its more recent evaluation of triclopyr.<sup>24</sup>

There are no publicly available chronic toxicity studies of commercial triclopyr-containing products.

#### Mutagenicity

Triclopyr's mutagenicity (ability to cause genetic damage) has been studied in a variety of laboratory tests. One study looked at triclopyr's ability to cause dominant lethal mutations in rat embryos. Dominant lethal mutations are mutations in sperm that cause the death of the embryo fertilized by the defective sperm, and are studied by counting the number of dead embryos in pregnant animals. In a study of female rats mated with males who had been dosed with triclopyr, the frequency of embryo loss increased at the middle and high dose (7 and 70 mg/kg).<sup>25</sup>

In seven studies of other kinds of genetic damage that were submitted by triclopyr's manufacturer in support of its

registration as a pesticide, no mutagenicity was observed.<sup>25</sup>

There are no publicly available mutagenicity studies of commercial triclopyr-containing products.

#### Carcinogenicity

Triclopyr's carcinogenicity (ability to cause cancer) has been studied in rats and mice. In both species, feeding of triclopyr significantly increased the frequency of breast cancer (mammary adenocarcinomas).<sup>26</sup> (See Figure 2.)

In EPA's evaluation of these studies, the agency called this carcinogenic response "marginal."<sup>26</sup> EPA therefore classified triclopyr as a Group D carcinogen, one that is "not classifiable as to human carcinogenicity,"<sup>26</sup> even though EPA's guidelines call for classifying pesticides as carcinogens if they cause cancer in laboratory tests of more than one species.<sup>27</sup>

In male rats, triclopyr caused an increase in the frequency of adrenal

tumors.<sup>26</sup>

There are no publicly available carcinogenicity studies of commercial triclopyr-containing products.

#### Effects on Reproduction

Triclopyr, its triethylamine salt, and its butoxyethyl ester have all caused reproductive problems in laboratory tests. Rats fed triclopyr for two generations had smaller litters and smaller offspring than did unexposed rats. Pregnant rats fed the amine salt had offspring that weighed less and had more skeletal abnormalities than offspring from unexposed rats. Pregnant rabbits fed the amine salt had fewer litters, fewer live fetuses, and more embryo loss than did unexposed rabbits. Pregnant rabbits fed the ester had fewer live fetuses, more embryo loss, and offspring with more skeletal abnormalities than did unexposed rabbits. These reproductive problems occurred at doses of 100 and 250 mg/kg per day.<sup>28</sup>

Recently, pesticide regulators, researchers, and the general public have become increasingly concerned about more subtle effects on reproduction. Of special concern has been the possibility that pesticides might interfere with the development of the nervous system. A new (1999) study shows that the major breakdown product of triclopyr causes this kind of effect. See "Hazards of Triclopyr's Major Metabolite," p. 18 for details.

There are no publicly available studies of how commercial triclopyr-containing products affect reproduction.

#### Effects on Birds

Triclopyr decreases the survival of newly hatched nestlings. In tests with mallard ducks, ducklings hatched from eggs laid by mother ducks that were fed triclopyr had a survival rate that was between 15 and 20 percent lower than the survival rate of ducklings from unexposed mothers. Effects occurred at concentrations in the ducks' food of 200 parts per million (ppm).<sup>29,30</sup>

#### Effects on Fish

According to EPA, the butoxyethyl

ester form of triclopyr is the form that is most toxic to fish. The ester is "highly toxic" to four of the five species tested: rainbow trout, bluegill sunfish, coho salmon, and the tidewater silverside. The most sensitive life stage and species in laboratory tests is the yolk-sac fry of the coho salmon, with a median lethal concentration ( $LC_{50}$ ; the concentration that kills half of a population of test animals) of less than 0.5 ppm.<sup>31</sup>

Triclopyr's butoxyethyl ester also affects fish behavior. In laboratory tests with rainbow trout, concentrations of 0.6 ppm resulted in rapid respiration, flared gills, and erratic, disoriented swimming.<sup>32</sup>

A field study in Ontario, Canada, found similar effects of the butoxyethyl ester on fish. In lake enclosures about half of the tested rainbow trout died at concentrations of 0.45 ppm and mortality reached 100 percent at concentrations of 0.69 ppm. Reduced growth occurred at even lower concentrations, 0.25 ppm. The Canadian researchers also found reduced growth in young rainbow trout following

application of the ester to a forest stream.<sup>33</sup>

The concentration of the triethylamine salt required to kill fish is much greater than that of the butoxyethyl ester.<sup>34</sup> However, effects on behavior ("voluntary neuromuscular control was lost and all the fish lay flaccid on the bottom, with irregular and labored breathing,"<sup>32</sup> according to the description written by the researchers who conducted this study) have been observed at lower concentrations, one-half the  $LC_{50}$ .<sup>32</sup>

### Effects on Frogs

A study of three species of frogs in Ontario, Canada, found that low concentrations of triclopyr butoxyethyl ester inhibited their avoidance behavior. Tadpoles normally move when touched or prodded; this behavior helps them escape predation. Tadpoles of all three species exposed to just over 1 ppm of triclopyr lost their avoidance response, and either "twitched in place or were completely unresponsive" when prodded. (See Figure 3.) The researchers, from Trent Uni-

versity and the Canadian Wildlife Service, concluded that exposure to 1.2 ppm of triclopyr "is likely to paralyze the more sensitive tadpoles, and such exposure may occur in a managed forest system."<sup>35</sup>

### Effects on Beneficial Insects and Spiders

Triclopyr can impact populations of beneficial insects and spiders, those that provide an economic benefit to agriculture, by killing plants on which the insects and spiders depend for food and shelter. For example, in a study of carabid (ground) beetles and spiders in a hawthorn hedgerow around an agricultural field in the United Kingdom, spraying with a triclopyr-containing herbicide caused decreases in populations of both predators.<sup>36</sup> In addition, the triclopyr herbicide Grazon was toxic to a spider mite used as a biological control agent to reduce populations of gorse. Typical application rates caused over 60 percent mortality. The authors concluded that "even low rates of these chemicals are likely to prevent mite establishment."<sup>37</sup>

### Effects on Oysters

Oyster larvae are more susceptible to triclopyr than other estuarine or marine animals. In a test with embryos and larvae of the Eastern oyster, all individuals developed abnormally at a concentration of 87 ppm.<sup>38</sup>

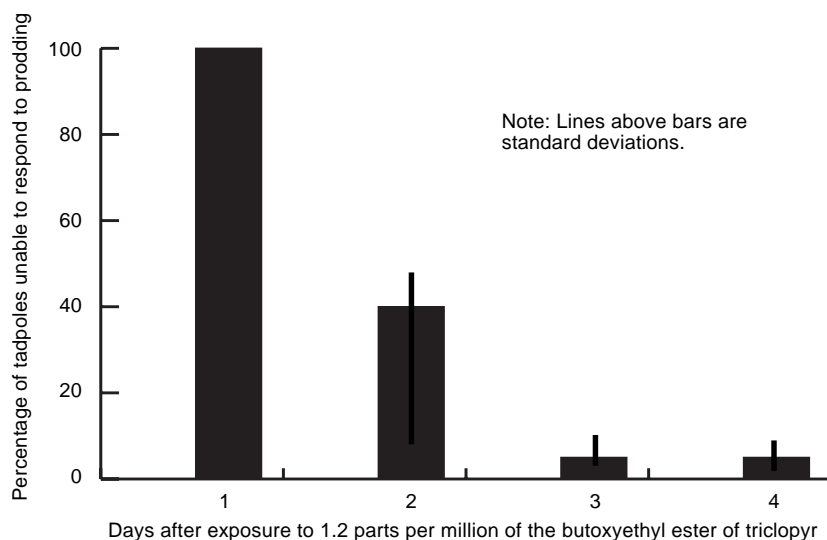
### Effects on Small Mammals

Treatment of a Canadian spruce plantation with the triclopyr herbicide Release decreased populations of the red-backed vole, the second most abundant small mammal. Triclopyr treatment decreased vole populations; they were reduced by about 80 percent from those in untreated areas one year after treatment. In the second year after treatment, vole populations were still reduced over 50 percent compared with untreated areas.<sup>39</sup>

### Complex Ecological Interactions

While complicated ecological effects of a pesticide are rarely studied, studies of

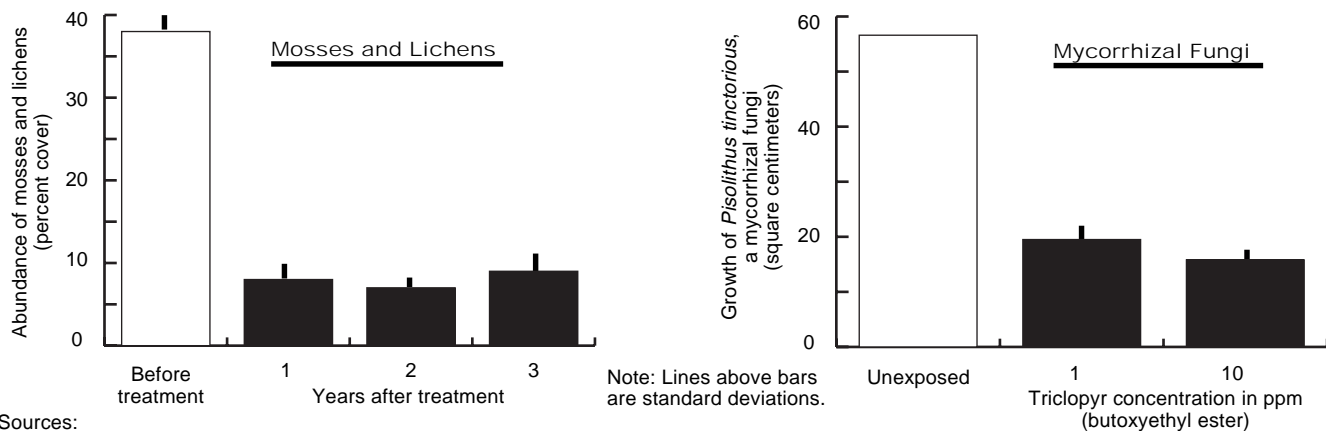
Figure 3  
Triclopyr and Tadpole Behavior



Source: Berrill, M. et al. 1994. Effects of low concentrations of forest-use pesticides on frog embryos and tadpoles. *Environ. Toxicol. Chem.* 13:657-664.

Normally, tadpoles dart away when prodded. This behavior helps them escape from predators. Green frog tadpoles exposed to the ester form of triclopyr ate unable to respond normally; they either twitch in place or remain still.

Figure 4  
Examples of Triclopyr's Effects on Nontarget Plants



Sources:

Estok, D., B. Freedman, and D. Boyle. 1989. Effects of the herbicides 2,4-D, glyphosate, hexazinone, and triclopyr on the growth of three species of ectomycorrhizal fungi. *Bull. Environ. Contam. Toxicol.* 42: 835-839.  
Newmaster, S.G., F.W. Bell, and D.H. Vitt. 1999. The effects of glyphosate and triclopyr on common bryophytes and lichens in northwestern Ontario. *Can. J. For. Res.* 29:1101-1111.

Triclopyr has a variety of effects on plants which are not intended to be targets of its herbicidal activity. Triclopyr treatment reduces the abundance of mosses and lichens in forest ecosystems. It also reduces the growth of beneficial mycorrhizal fungi.

triclopyr have found unexpected impacts on several levels of an ecosystem.

Two studies by researchers from Oklahoma State University looked at the link between triclopyr treatment and the abundance of parasitic worms in cotton rats and cottontail rabbits in an area of oak forest and tallgrass prairie. In both studies, certain species of parasites were less common in animals trapped in areas that had been treated with triclopyr. These parasites use insects and mites as hosts during part of their life cycle. Triclopyr, by reducing vegetation and therefore increasing temperatures on the forest floor, reduced populations of these insects leading to reduced populations of the parasites. A study of intestinal roundworms in mice conducted in the same forests had similar results.<sup>40-42</sup>

Use of triclopyr to kill unwanted vegetation on loblolly pine plantations also resulted in complex ecological interactions. Triclopyr-treated trees were approximately twice as likely as untreated trees to be damaged by the tip moth. The tip moth damage then increased the risk for fusiform rust, a pine disease.<sup>43</sup>

A third example of complex ecological interactions involves populations of slugs

and snails in spruce forests. The slugs and snails are used as "indicators of ecosystem change" because they are important components of boreal ecosystems and vulnerable to pesticide effects because they are relatively immobile. A Canadian study found that areas treated with the triclopyr herbicide Release had approximately half as many slugs and snails as did untreated areas. The reduction in numbers of slugs and snails was attributed to lack of vegetation: because plants were killed by the triclopyr, the soil surface was warmer and drier and there was less leaf litter deposited on the soil.<sup>44</sup>

#### Effects on Nontarget Plants

As a broadleaf herbicide, triclopyr efficiently kills many species of plants. However, it can also have unintended effects on plants that are not the target of the herbicide application. These effects include drift damage, genetic damage, inhibition of mycorrhizal fungi, reduction of nitrogen cycling, damage to mosses and lichens, and stimulation of algae blooms.

**Drift damage:** Because it is a potent herbicide, tiny amounts of triclopyr can damage sensitive plants. For example,

nine species of ornamental annual flowers were damaged by triclopyr in amounts equivalent to 0.05 percent of the maximum application rate recommended on product labels<sup>45</sup>; less than 0.1 percent of the maximum label rate damaged peanut and cucumber seedlings<sup>46</sup>; and less than 1 percent of the maximum rate is sufficient to reduce yield of cotton plants.<sup>47</sup> When EPA assessed risks from drift of triclopyr,<sup>48</sup> they concluded that one low-rate use, ground applications on rice, did not exceed the agency's "level of concern," but "in all other registered uses for both triclopyr triethylamine and triclopyr butoxyethyl ester, the level of concern for acute risk to nontarget plants"<sup>48</sup> was exceeded.

**Genetic damage:** In dividing onion root cells, triclopyr butoxyethyl ester causes the formation of abnormal chromosomes.<sup>49</sup>

**Mycorrhizal fungi:** Triclopyr herbicides inhibit the growth of a number of species of mycorrhizal fungi. (See Figure 4.) These are fungi that grow in or near plant roots and increase the uptake of nutrients by the plant. The most sensitive species are inhibited by concentrations of 0.1 ppm.<sup>50,51</sup> Using the GLEAMS

(Groundwater Loading Effects of Agricultural Management Systems) model developed by the U.S. Department of Agriculture,<sup>52</sup> the U.S. Drug Enforcement Agency calculated that soil concentrations of the triethylamine form of triclopyr used at typical application rates would equal or exceed the concentrations that have inhibited the growth of mycorrhizal fungi.<sup>53</sup>

**Nitrogen cycling:** Atmospheric nitrogen must be transformed by microorganisms before it is usable by plants as a nutrient. One step in this process, transformation of ammonia to nitrite, is inhibited by triclopyr. A laboratory study at the Swedish University of Agricultural Sciences found that triclopyr was more potent in reducing this activity than about 70 percent of the 48 pesticides tested.<sup>54</sup>

**Mosses and lichens:** Mosses and lichens are important parts of forest ecosystems, contributing to nutrient cycling, production of high-quality seedbeds, and maintenance of appropriate moisture content. Application of the butoxyethyl ester of triclopyr reduced the diversity of mosses and lichens on a replanted clear-cut in Ontario, Canada, by 60 percent. The abundance of mosses and lichens at the same site was reduced 75 percent. (See Figure 4.) The reductions persisted for the duration of the study, two years.<sup>55</sup> In a laboratory study, triclopyr damaged membranes and decreased photosynthesis in the lichen *Peltigera*.<sup>56</sup>

**Algae:** Treatment of a Canadian stream with concentrations of the ester form of triclopyr designed to mimic an accidental overspray caused an increase in the growth of algae in the stream. This algae bloom persisted for 40 days. Researchers believe that the algae growth was either the result of excessive nutrients, if the algae used the triclopyr as a source of nutrients, or a result of triclopyr's activity as a plant hormone.<sup>57</sup>

### Endangered Species

According to EPA's assessment of triclopyr's risks to endangered species, the agency's "levels of concern"<sup>58</sup> are exceeded for the triethylamine salt of triclopyr for

birds, mammals, and aquatic and terrestrial plants. For the butoxyethyl ester, "levels of concern"<sup>58</sup> are exceeded for birds, mammals, fish, aquatic invertebrates, estuary species, and aquatic and terrestrial plants. EPA has not yet determined what protective measures are necessary.<sup>58</sup>

### Persistence in Soil

Triclopyr's persistence in soil is variable. According to EPA, half-lives (the amount of time it takes for half of an applied chemical to break down or move away from the treatment site) of triclopyr measured in field studies varied from 10 to almost 100 days. In general, half-lives were longer on forestry sites than they were on agricultural sites.<sup>59</sup>

EPA also reported that enough triclopyr persisted in field studies to reduce the yield of cucumber plants for 3

or 4 months after treatment with the triethylamine salt, depending on application rate.<sup>60</sup> A field study in western Oregon found that triclopyr persisted for a year after treatment with the amine salt.<sup>61</sup> EPA also reports persistence of over a year in another field study.<sup>62</sup>

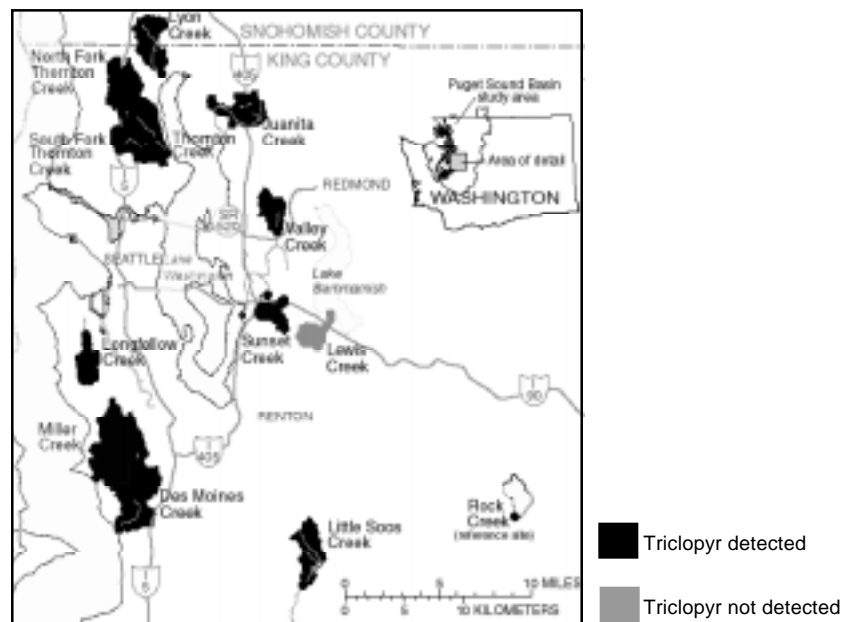
### Mobility in Soil

According to EPA, triclopyr is "very mobile" in soil.<sup>63</sup> Triclopyr molecules are not strongly held by soil or sediment particles.<sup>64</sup>

### Contamination of Water

**Ground water:** Since triclopyr is mobile in soil, as well as "somewhat persistent," EPA "believes this chemical has the potential to leach to ground water."<sup>65</sup> Although there has been "limited monitoring for triclopyr in ground water,"<sup>65</sup> studies have found triclopyr contamination

Figure 5. Triclopyr in Urban Streams



#### Sources:

U.S. Geological Survey. 1999. Pesticides detected in urban streams during rainstorms and relations to retail sales of pesticides in King County, Washington. USGS Fact Sheet 097-99. Tacoma WA, Apr. U.S. Geological Survey. Undated. Puget Sound Basin NAWQA data. <http://wa.water.usgs.gov/pugt/fs.09-99/data.ecy>.

Triclopyr was found in all but two of the urban streams studied by the USGS near Seattle, Washington.



in wells in two states, Virginia and Texas.<sup>65</sup> The GLEAMS model indicates that the triethylamine salt of triclopyr amine is more likely to move through soil and into ground water than the butoxyethyl ester.<sup>66</sup>

**Surface Water:** Triclopyr also contaminates rivers and streams. A recent national monitoring program conducted by the U.S. Geological Survey (USGS) found triclopyr in 8 of the 20 river basins studied.<sup>67</sup>

On a smaller scale, a USGS study of

10 urban watersheds near Seattle, Washington, found triclopyr at 90 percent of the sites sampled,<sup>68</sup> indicating that contamination of urban streams with triclopyr may be widespread. (See Figure 5.) Triclopyr has also contaminated streams following aerial forestry applications; rivers following applications to rice fields; and surface water following golf course applications.<sup>61,69-72</sup>

The GLEAMS model indicates that the butoxyethyl ester of triclopyr is more likely to run off into surface water than its triethylamine salt.<sup>73</sup>

#### Hazards of Triclopyr's Major Metabolite

The most common breakdown product of triclopyr in mammals, as well as in soil and water, is 3,5,6-trichloro-2-pyridinol.<sup>74</sup> (TCP; See Figure 6.) TCP has also been found in meat and meat fat.<sup>75</sup> Interestingly, TCP is a major

metabolite of the organophosphate insecticide chlorpyrifos.<sup>76</sup>

The most significant health hazard identified for TCP is that it may be especially hazardous to children. Recently (1999), EPA researchers studied the ability of TCP to disrupt the development and maturation of the nervous system that occurs in fetuses, infants, and children. Using a laboratory test system (a cell culture), the researchers showed that exposure to TCP inhibits neurons (nervous system cells) from undergoing normal growth. Concentrations of only 0.2 ppm were sufficient to disrupt growth.<sup>77</sup> (See Figure 7.) Concentrations equal to this level have been measured in the brains of fetal laboratory animals whose mothers were exposed to pesticides. In addition, when researchers compared TCP concentrations in brains of fetal laboratory animals with those in their mothers' brains, the fetal concentrations were between two and four times greater than those in maternal brains, suggesting that TCP accumulates in fetal brains.<sup>78</sup>

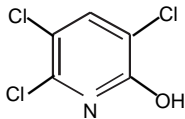
TCP also disrupts the functions of mitochondria, structures in virtually all cells that convert food into energy usable by the cell. In a study using mitochondria from rat liver cells, concentrations of 2 ppm TCP reduced four measures of mitochondrial function by at least 30 percent.<sup>79</sup>

TCP also poses a variety of environmental hazards: it is "very mobile" in a variety of soil types and is also often more persistent than triclopyr itself<sup>80</sup>; it is toxic to soil bacteria (based on tests of a model species)<sup>80</sup>; and it is toxic to chicken embryos.<sup>81</sup> ♣

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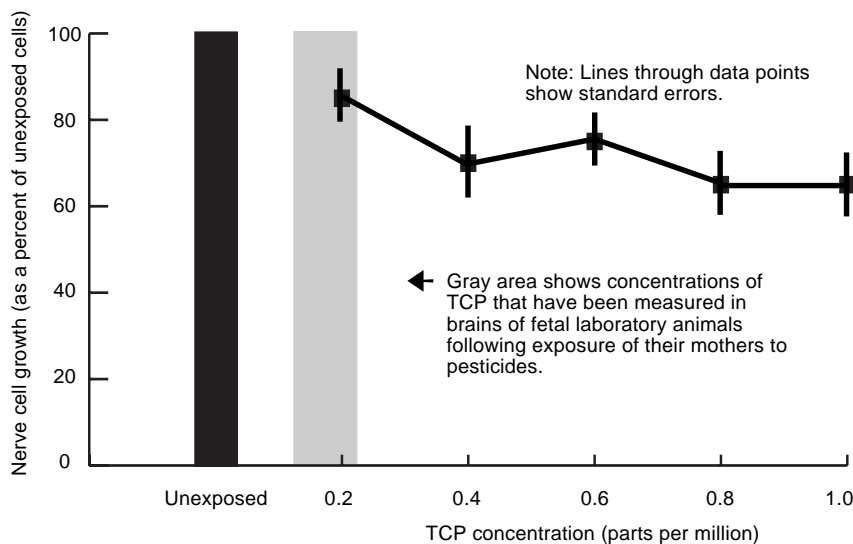
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Figure 6  
3,5,6-Trichloro-2-pyridinol  
(TCP)



Triclopyr's major metabolite.

Figure 7  
Effect of TCP on the Growth of Nerve Cells



Source:

Das, K.P. and S. Barone. 1999. Neuronal differentiation in PC12 cells is inhibited by chlorpyrifos and its metabolites: Is acetylcholinesterase inhibition the site of action? *Toxicol. Appl. Pharmacol.* 160:217-230.  
Hunter, D.L., T.L. Lassiter, and S. Padilla. 1999. Gestational exposure to chlorpyrifos: Comparative distribution of trichloropyridinol in the fetus and the dam. *Toxicol. Appl. Pharmacol.* 158:16-23.

In laboratory studies relatively low concentrations of TCP inhibit the growth of nerve cells.



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From: [Ron Proctor](#)  
To: [Campus Planning - EIR](#)  
Subject: Save Sutro Forest from development  
Date: Tuesday, February 19, 2013 9:33:21 AM

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UCSF Campus Planning  
UCSF Environmental Coordinator, Diane Wong

Ms. Wong:

I signed the petition to stop the destruction of 90% of the trees in Sutro Forest. I love the beautiful Cloud Forest and its habitat value. The trees reduce air pollution, by trapping particulate matter on their leaves; but destroyed trees, which sequester tons of carbon, will no longer do so, and instead the dead chipped trees will release carbon dioxide into the atmosphere. I strongly protest the destruction of over 30,000 trees; your actions will affect my property value.

**Your true motive is to develop the property, correct? You are clearing of the property for future development of additional building space?**

Note, I am a resident of the area for over 35 years.

Thank you for your consideration.

Ron Proctor  
579 Teresita Blvd  
San Francisco, CA 94127

203 Belgrave Ave.  
San Francisco, CA 94117

February 22, 2013

Secretary and Chief of Staff  
University of California Regents  
1111 Franklin Street, 12<sup>th</sup> Floor  
Oakland, CA 94607

We are close neighbors of the Sutro Forest. We would like to express our **support and appreciation of the project to eliminate** the majority of the existing Eucalyptus material in the Forest and to replace it with different, appropriate plant material.

The Eucalyptus trees present in the Forest are not a native species.

They are flammable and a danger to the adjacent neighborhoods.

They have grown uncontrolled for many years to very tall heights, looking for sunlight and becoming a danger to adjacent residences because their root system is shallow and weak. Several of these trees have been felled in Golden Gate Park and in the Panhandle by strong winds on old, large, heavy trees, similar in age and girth to the ones in the Sutro Forest. In fact several trees have fallen in the Forest and can be observed from the existing trails. This variety of tree is prolific and generates saplings profusely with the result before us.

This species of Eucalyptus tree is a very dirty tree that drops large amounts of leaves that become a fire danger as they dry and turn into fuel.

Once a year for several weeks this tree drops very large amounts of light tan stamen sufficient to whiten the adjacent streets. Throughout the year it drops bark that turns into fuel as the tree grows and its trunk needs a larger skin. It should be noted that persons in favor of maintaining the existing Forest have never volunteered to clean the debris produced by the trees in or out of the Forest near our address.

The growth of these trees in the Forest has encumbered splendid views and replaced them with a not particularly attractive variety due to its shape, color and odor. It is unfortunate that the economic interests of Adolph Sutro in producing abundant and inexpensive construction material has backfired on those of us that have come to live in this neighborhood. We moved into our house in 1978.

We trust that the University of California will proceed with this project and we look forward to the ultimate favorable project results with much anticipation.

Sincerely,



Benito Noyola

Cc: UCSF Campus Planning ✓  
EIR@planning.ucsf.edu

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UCSF

FEB 27 2013

CAMPUS PLANNING  
OFFICE

From: [Dee Seligman](#)  
To: [Campus Planning - EIR](#)  
Subject: comment on Mt. Sutro Open Space Reserve  
Date: Friday, February 22, 2013 5:17:19 PM

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Dear Ms. Wong,

My name is Dee Seligman. I live at 2094 Fell St., San Francisco, CA94117, within half a mile of Mt. Sutro, where my husband and I walk for recreation.

I am opposed to the felling of the Mt. Sutro eucalyptus trees because I believe 1) UCSF is subscribing to a twenty-first Western U.S. cultural construction about eucalyptus trees rather than understanding how they function in our complex urban eco-system; 2) the evidence shows that these eucalyptus trees are healthy; 3) the so-called “thinning” motivation actually increases susceptibility to fire.

How we see trees has always depended on where we live and the time in which we live. New England farmers saw them as weeds because they wanted fields for animals. Later colonists viewed them more as commodities, good for barrels and ship masts, but 19<sup>th</sup> century Europeans who had very few forests left felt it unthinkable to chop down trees. Today we bear the fruit of Emerson, Thoreau and Muir and look to trees as antidotes to commercial culture and as places of refuge.

Except in San Francisco—where redwood and oaks carry this spiritual cachet but eucalyptus are perceived as messy invaders planted here after the earthquake in an effort to provide quick lumber. We know now that they are not good for lumber, but we also know they are good for Monarch butterflies as winter habitat and as places for as many as 40 different bird species to nest and forage. They resist wind and help prevent erosion, especially on steep hillsides. They sequester large amounts of carbon, which would otherwise be released to the atmosphere when they are chopped down and reduced to mulch. Finally, by moving species around and introducing the eucalyptus, we humans actually increased the biodiversity of our urban forests. Most cities are busy planting thousands of trees to mitigate climate change and pollution, but UCSF is busy removing trees and planting grasses and shrubs instead, out of a misguided construction of eucalyptus trees.

One motive offered by UCSF is the trees are unhealthy, but a 2010 independent evaluation by two certified arborists

(<http://sutroforest.com/2013/02/13/is-ucsfs-sutro-forest-actually-unhealthy/>)

found it was a “healthy” “thriving” “naturalized forest. They indicated that trees in a cloud forest grow tall and spindly to reach the canopy and that self-thinning is part of how they adapt. To artificially thin this type of forest will send the trees into decline. Additionally, they warned that these trees are different than ones grown in a garden or on a lumber farm, so that the metrics of density and size used for trees in a garden or on a lumber farm should not be used for these trees, a living whole adapted to the conditions of a cloud forest.

The second motive offered by UCSF is that the trees must be thinned to increase forest health. In fact, thinning such a forest increases the hazard level because the forest floor, where the fire spreads, is more open and because the forest floor dries out. Putting in native grasses and scrub in the cleared-out understory will result in more dangerous fuel loads, according to Weatherstone and Skinner of the USDA Forest Service (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). Jon E. Keeley’s book on California fire ecology (*Fire in Mediterranean Ecosystems*, Cambridge University Press, 2011) described the dangers of fire exacerbated by steep slopes where winds whip through and grass provides good fuel. These are the very conditions that would result from eucalyptus removal on Mt. Sutro. Why is UCSF even considering this plan?

Sincerely,

Dee Seligman, Ph.D.

From: [Wong, Diane C.](#) on behalf of [Campus Planning - EIR](#)  
To: [Campus Planning - EIR](#)  
Subject: FW: Mt. Sutro  
Date: Monday, March 04, 2013 4:30:22 PM

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**From:** Cynthia Travis [mailto:[cytravis@gmail.com](mailto:cytravis@gmail.com)]  
**Sent:** Tuesday, February 26, 2013 12:57 AM  
**To:** Campus Planning - EIR  
**Cc:** Lew, Damon; Bagot-Lopez, Barbara  
**Subject:** Re: Mt. Sutro

On Feb 22, 2013, at 1:30 PM, Cynthia Travis <[cytravis@gmail.com](mailto:cytravis@gmail.com)> wrote:

I support UCSF's plan to restore Mt. Sutro forest. In 2010, I and other neighbors visited a small Demonstration Project in a densely overgrown area just west of the Surge Parking Lot. The trees had been thinned to an average 30' apart and the understory had been removed, as described in the Draft EIR. We learned that the big trees were coming to the end of their lifetime, and that cutting and thinning would give the next generation a chance to thrive. Aesthetically, the area looked a lot healthier and more accessible than the adjoining land. It looked the way it did in the late '70's. Back then, we could roam all around the forest. Now, it has become so overgrown that we must remain on the trails. The forest has become a jungle.

That said, I remain vigorously opposed to the use of herbicides on Mt. Sutro. It won't take a statistician to conclude that herbicides are the most effective and financially feasible way to control re-growth in the Demo areas. However, it doesn't take a scientist to appreciate that soaking a hillside with toxic chemicals will pose a danger to our water, children, pets, wildlife and plants. The known risks are abundantly discussed in the Draft EIR. These occupy several hundred pages of text, statistical data, and charts. The herbicide Glyphosate, which UCSF proposes to use, is currently suspected of causing reproductive problems in both humans and animals. Even in low concentrations, it kills most tadpoles with which it comes in contact. Triclopyr, the other chemical that UCSF plans to use, is more poisonous than Glyphosate. In addition to the known cancer and reproductive issues, it causes corrosive damage to eyes and skin, and must be handled with great care. Furthermore, it remains toxic for 30-60 days.

These are the known risks. However, these chemicals' unintended consequences create an even greater hazard. It is common for a "safe" product subsequently to be deemed unsafe. Diazinon, a popular pesticide, and the flame retardant chemicals used in furniture and children's sleepwear, are examples.

Do we want to accept the risk that, sometime in the future, scientists concede that the Mt. Sutro herbicides are even more toxic than we originally understood? I'm not willing to do so. The Draft EIR refers often to worst-case scenarios. In my mind, the worst-case scenario for UCSF's widespread use of herbicides on Mt. Sutro is that our pristine wilderness, with its lovingly-restored trails, might become a Superfund site.

Fortunately, the Draft EIR considers healthier alternatives. These include tarping of tree stumps, manual removal of new sprouts, and goatherd.

UCSF is a world-class medical center. Therefore in this, as in all health issues, UCSF should lead the way. Mt. Sutro offers the opportunity for UCSF to launch a high-profile healthy forest project as part of its core mission. The project would demonstrate the latest organic alternatives to herbicide use on a very large scale. . The project would show that UCSF is unwilling to make unhealthy compromises for the sake of convenience or cost. I suspect that this approach would have broad appeal, and that donors and volunteer forest stewards would be anxious to participate. Personally, I'd be honored to join both groups.

Cynthia Travis  
58 Woodland Ave.  
San Francisco, CA 94117

From: [ann cromeey](#)  
To: [Campus Planning - EIR](#)  
Subject: Sutro Forest  
Date: Wednesday, March 13, 2013 6:09:37 PM

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----- Forwarded message -----

From: **ann cromeey** <[anncromeey2@gmail.com](mailto:anncromeey2@gmail.com)>  
Date: Sat, Feb 23, 2013 at 4:08 PM  
Subject: Sutro Forest  
To: [chancellor@ucsf.edu](mailto:chancellor@ucsf.edu)

Mr. Chancellor:

PLEASE, PLEASE, PLEASE do not allow Sutro Forest, which is perhaps the most beautiful spot in San Francisco, to be destroyed because of a misguided notion of which trees are to be kept.

PLEASE do not be swayed by an ideologue's notion of trading ecological purity for murdering the most gorgeous spot in the City.

It seems to me that UCSF is hoping to be the Jim Jones of Sutro Forest, convinced that killing trees is the right course of action. You would destroy the peace of mind of many, many of us who walk through this forest as a holy place. **DON'T DESTROY IT!**

Ann Cromeey  
San Francisco



From: [Jill Kent](#)  
To: [Campus Planning - EIR](#)  
Subject: Sutro Forest  
Date: Sunday, February 24, 2013 2:50:26 PM

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Dear UCSF,

Please don't cut down the eucalyptus trees on Mt. Sutro. They are beautiful, a wonderful place to walk and provide homes to many city animals and birds. Trees are so hard to come by in the City as it is that the idea of cutting down 30,000 full-grown, beautiful trees seems like a crime to me. After 100 years, I would think that eucalyptus would now be considered native plants anyway. Don't destroy something wonderful for an idea.

Sincerely,

Jill Kent  
39 Wawona St.  
SF, CA 94127  
(415) 566-5636

From: [Manning, John \(US\)](#)  
To: [Campus Planning - EIR](#)  
Subject: Against the destruction of Sutro Forest  
Date: Sunday, February 24, 2013 5:22:02 PM

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I'm a homeowner at 118 Woodland and hike in the woods consistently (3x per week. As much as anyone, probably.).

It's a shame UC is doing this. My concerns are:

- 1) it's really cool up there now and will lousy thereafter.
- 2) increased wind in Cole Valley.
- 3) pesticides.
- 4) the "demonstration" areas are huge! There's no real test; they are just doing it.

How do we stop them legally? Do they need permits?

Thanks,  
John

John Patrick Manning  
Managing Director  
Real Estate Investment Banking  
Jones Lang LaSalle  
One Front Street, Suite 1100  
San Francisco, CA 94111  
tel +1 415 395 4953  
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[john.manning@am.jll.com](mailto:john.manning@am.jll.com)  
<http://www.us.joneslanglasalle.com/investmentbanking>

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CAMPUS PLANNING  
OFFICE

OFFICE OF THE SECRETARY  
AND CHIEF OF STAFF TO  
THE REGENT  
1111 Franklin St., 12Floor  
Oakland, CA 94607  
(510) 987-9220  
Fax (510) 987-9224

25 February 2013

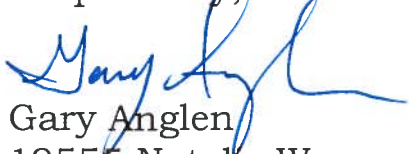
UCSF Board of Regents,

Please save your forest from the newest environmental morons. San Francisco is not a Natural Environment. The City rebuilt after the Great Earth Quick. It is built on fill and rubble – yet it is beautiful. The same small group mentality in the late sixties destroy the great San Francisco Jazz area of town, for urban renewal.

If your forest needs to have diseased trees removed or burned – then do it. If a small area of over growth needs to be pruned then do it. Although the forest like San Francisco is not natural as I say do not remove non-native plants unless they are invasively growing.

Non-native animal – call fist and game and have them removed.

Respectfully,



Gary Anglen  
19555 Natalie Way  
Redding, CA 96003

CC: UCSF Campus Planning  
654 Minnesota Street, 2nd floor  
San Francisco CA 94143-0286  
Tel 415-476-2911  
Fax 415-476-9478

Comment from  
Diane Wong  
UCSF Campys Planning  
654 Minnesota Street  
SF, CA 94143-0286

2/25/2013

Mount Sutro is so special -- a wild forest -- a cloud forest -- right in the center of the city. What a gem. You can go there, and the rest of the world melts away. I'm a wildlife photographer, so I know that it's in the understory and thickest parts of the forest that the animals live. It serves as protection and that is where they find food.

Please retain our wilderness area composed of the dense forest of trees and lush undergrowth -- not only for those of us who love it and work in that magical environment, but for the animals who thrive there.

We have many "park like" areas in the city. We have few forests. We have ONE Sutro Forest. Please, please don't tear it down for scrub and grasses and yet another "park-like" environment.

Thank you. Janet Kessler

Comment for DEIR on ~~UCSF~~ UCSF Mt. Sutro  
Management project.

My Address

Janet Kessler  
636 Douglass St.  
SF, CA 94114

JannyCK@aol.com

February 25, 2013

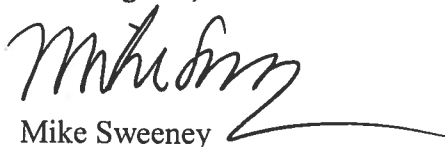
Ms. Diane Wong  
UCSF Campus Planning  
Box 0286  
San Francisco, CA 94143-0286

Dear Ms. Wong,

The Nature Conservancy of California appreciates the opportunity to comment on the DEIR for the UCSF Mount Sutro Management project. We have been active in the San Francisco Bay Area for over 40 years and recognize the importance of this and other urban lands for the public's enjoyment, education, and for the sustenance of natural communities and species of California.

We commend you on taking steps to ensure public access and safety at the site, and to enhance the value of the UCSF lands for the many species of plants and wildlife found in San Francisco's urban wildlands. Your integration of education and public communication into the project will greatly enhance these outcomes.

Best Regards,

  
Mike Sweeney

COMMENT FORM

Date: 2/25/2013

Diane Wong  
UCSF Campus Planning  
654 Minnesota Street  
San Francisco, CA 94143-0286

Dear Ms. Wong:

I wish to make the following comment(s) regarding the Draft Environmental Impact Report (EIR) on the UCSF Mount Sutro Management project:

I am happy that the Sutro Forest has been thinned of eucalyptus trees and ivy and berry bushes. I do recall the thick + frightening state of the ~~past~~ forest when I lived on Parnassus in 1975-1977.

I go to the Rotary garden monthly. The forest is far less thick with ivy, it is ~~very~~ less flammable. As a person who has lived on fourth Avenue for 25 years, I am pleased that attention is being paid to the prevention of a forest fire.

I am a bird watcher and am very aware of the increased variety of bird life that I have seen; sharp shinned (forest) hawks, lazuli buntings (nesting), and rough-necked turkeys.

I endorse the ~~words~~ of draft management plans. I am so grateful for your efforts, the Sutro Stewards Sincerely, and Craig Dawson in particular.

I congratulate UCSF in its management EIR.  
Maryann Rainey

1318 - 4th ave  
SF, CA 94122

~~Rainey~~ mprainey@comcast.net.

**25 February 2013**

**There are no good reasons for moving forward with the UCSF tree cutting plan for Mt. Sutro, and there are multiple reasons to stop it. Mt. Sutro should continue to be a forest and not be at risk of becoming a park.**

**I would like to emphasize that UCSF is not a private entity, but a public university, heavily supported by state tax dollars. While UCSF contributes much to the city, especially through employment, UCSF also receives significant benefits from the city. Its recruiting, especially, relies upon the livability and amenities of SF.**

**Urban forests help to make SF a desirable place to live and work. So UCSF should be a good neighbor to city residents by appropriate management of the cloud forest on Mt. Sutro.**

**UCSF's claim that its plan is being misrepresented is disingenuous: UCSF is requesting permission for massive tree cutting and, once approved, UCSF would not need to back off of that plan, no matter the community input.**

**I oppose the UCSF plan because the rationales for it do not hold up:**

**The forest overall is healthy and should be allowed to self-maintain (except for essential pruning near parking lots and other areas subject to property damage).**

**&**

**The forest does not pose a fire risk because of its micro-climate (and in fact, the work planned could create a fire risk).**

**I not only love and enjoy Mt. Sutro as it is, I fear for the damage that the UCSF plan could cause to existing plants and wildlife, to nearby homeowners' housing values and quality of life, to hikers who would miss the resource, and to the environment as a whole.**

**Louise Rehling  
751 Rockdale Drive  
San Francisco, CA 94127  
650-208-8678  
LuRehling@gmail.com**



*FEB 26 2013*

Diane Wong  
UCSF Campus Planning  
Box0286  
San Francisco, CA 9414-0286

My wife and I attended the public hearing on Monday 25, 2013. As neighbors to Mt. Sutro Forest for the past forty years we have always been concerned with the fire danger. When San Francisco Park and Recreation and Stewards of Mt. Sutro argued for the opening of a trail at 17<sup>th</sup> Street and Stanyan they contended with expert testimony that THERE WAS NO FIRE DANGER PRESENTED BY THE EUCALYPTUS TREES ON MT SUTRO!

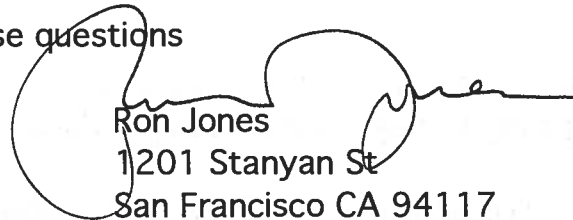
At last night's meeting the same voices argued THERE IS A FIRE DANGER PRESENTED BY THE EUCALYPTUS TREES ON MT. SUTRO.

It appears that expert testimony can argue from opposing objectives. This leads me to rely on common sense. Mt. Sutro Forest like any forest is subject to inevitable fire. Yes, partial trimming and clearing of undergrowth might make for better views and trails but not stop the inevitable fire. In fact the projection of human presence in the forest might increase the fire probability.

So the real question in your planning is "what is your plan to fight this fire once it ignites?" Does the SFFD have plans and capability to fight a Mr. Sutro forest fire? Does UCSF plan for Mr. Sutro include availability of California Department of Forestation (CDF) airdrops of fire retardant? Will UCSF commit to funding a "protective plan" and "on call" availability by SFFD and CDF?

Once UCSF ventures into the physical management of the Mt. Sutro Forest, will UCSF assume responsibility for its protection and liability for a fire that would engulf the forest, surrounding homes, and buildings? What insurance provisions has UCSF made to compensate the lost of property and life caused by the fire that is no longer an 'act of God' but now an act by UCSF?

Thank you for addressing these questions

  
Ron Jones  
1201 Stanyan St  
San Francisco CA 94117

*rondeanna.jones@comcast.net*



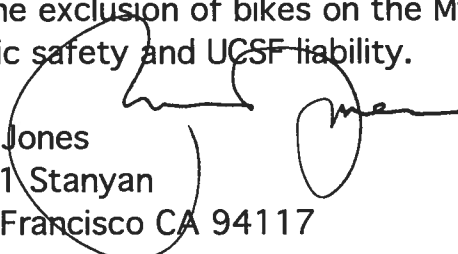
*FEB 26 2013*

Diane Wong  
UCSF Campus Planning  
Box 0286  
San Francisco, CA 94143-0286

My name is Ron Jones. I have lived adjacent to Mt. Sutro Forest for the past forty years. My wife and I enjoy the Stanyan street trail into the forest. I am concerned about safety on the trail. The trail is very narrow with many blind turns. On several occasions a downhill bike rider has wildly careened into us. Unable to stop, the bike rider is forced to throw his bike into the hillside or skid past us with an apology.

The injury potential for hikers vs. biker is enormous. I often think what if the biker using the trail like a roller coaster couldn't stop! What would happen if the rider or hiker was severely injured or thrown down the gully? Or walker with dog suddenly encounters a Mountain Biker that has no room to swerve or avoid a frightened dog? Or an out of control biker crashes into a group of children because there is no place to get out of the way? How much time would it take EMS to find and treat the injured? Who is liable for injury on this attractive hazard?

I strongly implore you to include in your plans the exclusion of bikes on the Mt. Sutro Forest Trails as a critical concern for public safety and UCSF liability.

  
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February 26, 2013

Diane Wong, Environmental Coordinator  
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San Francisco, CA 94143-0286

Re: UCSF Mount Sutro Reserve Management Project/Draft Environmental Impact Report

## **GREENHOUSE GAS (CO<sup>2</sup>) RELEASE BY MOUNT SUTRO CLEARING**

The DEIR for the UCSF Mount Sutro Reserve Management Project grossly underestimates the greenhouse gas (CO<sup>2</sup>) release that will result from the planned clearing of trees on Mount Sutro. The underestimate of CO<sup>2</sup> release is made in the service of the claim that the project will have no significant adverse impact on greenhouse gasses. An accurate determination of the GHG impact of the project requires a better estimate of the CO<sup>2</sup> to be released. There will be more CO<sup>2</sup> released and more adverse impact than the DEIR claims.

The DEIR underestimate of CO<sup>2</sup> release results from many errors: 1) an overestimate of the trees remaining after thinning, produced by overestimating the number of trees per acre that corresponds to 30 foot spacing, 2) completely ignoring the carbon released from the roots, limbs, leaves, and bark of the destroyed trees, 3) ignoring that two acres that will be thinned to 60 foot spacing, 4) ignoring the carbon in the trees less than 5" DBH, 5) ignoring the carbon in the understory to be cleared, and 6) using a false literature citation to claim that 40% of the carbon will remain sequestered in debris on the ground for up to 100 years.

I will discuss each of these errors individually, and then present a more accurate estimate that corrects for the errors. We will find 48,364 tons of CO<sup>2</sup> to be released, rather than the 11,286 tons claimed to be an overestimate by the DEIR. That's a significant difference.

I will also correct a significant error in the DEIR's statement on the "cumulative impact" of the project's carbon emissions.

### **1. Trees per acre**

The DEIR calculation of trees removed during thinning (DEIR Appendix F) is based on an incorrect overestimate of trees remaining after thinning to 30 foot spacing. The DEIR calculation of 62 trees/acre assumes that circles with area 706.5 ft<sup>2</sup> can be packed into an acre with area 43,560 ft<sup>2</sup> with no area left uncovered. That is physically impossible; circles cannot be packed into an area without "wasting" area. A maximum density packing of 30-foot circles might produce 58 trees/acre, but even that is not realistic. Planting a tree farm and thinning an existing forest are two very different tasks when trying to maximize density with fixed spacing. Maximum density can be achieved only if trees are to be planted on flat, bare ground, where each tree can be placed exactly where it is wanted. But thinning the existing forest on Mount Sutro requires that only trees already there can be there after thinning; their locations are predetermined. Thus spacing will not be precise and locations will not be

optimal for maximum tree density. Further, a maximum density calculation assumes there is no wasted area at the edges of the thinned plots. That also does not happen in the real world.

Foresters do not relate tree spacing to trees per acre by considering circles. For uniform spacing, they consider each tree to occupy a square of area  $L \times L$ , where  $L$  is the spacing distance.<sup>1</sup>

Using this standard, and more realistic, estimate of the trees remaining after thinning to 30 ft. spacing, we find each tree gets  $30 \times 30 = 900 \text{ ft}^2$ , which leaves  $43,560/900 = 48 \text{ trees/acre}$ .

## 2. Roots, leaves, branches, bark

The DEIR calculation of carbon released by thinning accounts only for carbon currently stored in the trunks (boles) of the trees to be removed. The biomass equations used are clearly labeled as, “for within bark stem wood and do not include the biomass of bark or branches.” (DEIR Appendix F) Thus the carbon released from roots, leaves, branches, and bark is simply ignored.

However, it is possible to estimate the carbon stored in roots, leaves, branches and bark of trees. A US Forest Service publication on carbon storage in forests shows that ***fully half of the carbon stored in a tree is in foliage, roots, and other (i.e. other than bole) above ground wood.***<sup>2</sup> Thus, any estimate of carbon stored in the bole (trunk) of a tree must be doubled to obtain the carbon stored in the whole tree.

## 3. Plot thinned to 60 foot spacing

The DEIR calculation of carbon removed in thinning the Mount Sutro Reserve ignores the two-acre plot that will be thinned to 60 foot spacing. (Identified in DEIR section 3.5.1.4, p. 3-13) As in #1 above, 60 foot spacing means each tree occupies  $3600 \text{ ft}^2$ , and there are 12 of them in an acre, so  $175 - 12 = 163$  trees will be removed from each of those two acres.

## 4. Carbon in trees less than 5 inches DBH

The DEIR completely ignores the carbon currently stored in the trees less than 5 inches DBH, all of which will be cleared from 46 acres of the reserve. The carbon content of these smaller trees can be calculated using the formulas provided in Appendix F. There are approximately 740 trees per acre in the reserve (DEIR p. 3-5), 175 of which are greater than 5 inches DBH (DEIR Appendix F), leaving 565 trees per acre less than 5 inches DBH. The DEIR says the eucalyptus trees are not reproducing on the reserve, so it is reasonable to assume there are no 1 inch or 2 inch trees. It is also reasonable to assume the 565 small trees in an acre are a uniform mix of 3 inch, 4 inch, and 5 inch trees. Their trunks in one acre contain carbon as follows:

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<sup>1</sup> Florence, RG, Ecology and Silviculture of Eucalypt Forests, CSIRO Australia, 1996, page 328.

<sup>2</sup> Birdsey, RA and Heath,LS, “Carbon Changes in US Forests,” In: Joyce, LA, ed. Productivity of America’s Forests and Climate Change. Gen. Tech. Report RM-GTR-271, Fort Collins, CO: US Department of Agriculture, Forest Service, Rocky Mountain Forest and Experiment Station: 56-70, Figure 4.1, page 6

DBH (inches)	number trees	Volume (cubic feet)	biomass (lbs)	biomass (tons)	C/tree (tons)	CO <sub>2</sub> e/tree (tons)	CO <sub>2</sub> e (tons)	
3	189	0.80164896	40.01832	0.020009	0.010005	0.0367168	6.939476	
4	188	1.61605519	80.67348	0.040337	0.020168	0.0740179	13.91537	
5	188	2.78370355	138.9625	0.069481	0.034741	0.1274981	23.96964	
							<b>44.82448</b>	<b>tons CO<sub>2</sub>e</b>

I will use 40 tons/acre for the CO<sub>2</sub>e in the trunks of these small trees, and another 40 tons/acre for the CO<sub>2</sub>e in the roots, leaves, branches, and bark. (See #2 above)

##### 5. Carbon in the understory

The DEIR completely ignores carbon loss from clearing understory. From Birdsey and Heath, cited above, the amount of carbon in forest understory is approximately 6.67% of the amount of carbon in tree trunks.<sup>3</sup> Since current carbon storage in standing tree trunks on the reserve is 636.1 tons CO<sub>2</sub>e per acre (Table 2, Appendix F), and since the understory is to be 90% cleared, the DEIR should include 90% of 6.67% of 636.1 = 38 tons CO<sub>2</sub>e lost per acre from understory clearing.

##### 6. Carbon remaining stored on the ground after thinning

The DEIR argues that only 60% of the carbon in removed trees is actually released, because "Wayburn et al (2000) estimate that up to 40% of carbon in unburned harvested wood is retained for 20 to 100 years." (DEIR, Impact Analysis, Appendix F) The DEIR completely misrepresents what Wayburn et. al. say. The DEIR implies that the carbon in unburned wood on the forest floor is retained for 20 to 100 years. Wayburn et. al. say absolutely nothing about carbon on the forest floor; they are discussing wood that is made into houses and furniture. Specifically, Wayburn et. al. wrote, "...roughly between 20% and 33% of labile forest carbon ends up in forest products. Up to 40% of this carbon is *stored* over the long term *in such products as saw timber and furniture*, lasting from 20 or more than 100 years."<sup>4</sup> (Emphasis added) The DEIR citation is totally irrelevant to the Mount Sutro Management Plan, in which all the wood remains on the forest floor (DEIR p. 4.6-18), decomposes, and releases its carbon to the atmosphere.

The "40% discount" calculated in Appendix F is simply invalid.

Also: The calculation of the "40% discount" in Impact Analysis, Appendix F is unnecessarily (deliberately?) obtuse. There is no reason to convert the calculated carbon loss into a "percentage loss of carbon sequestration capacity" for the whole reserve, modify that percentage, and then convert the modified percentage back into carbon loss. That round-about method introduces small errors (from rounding), resulting 11,286 tons, when 60% of 18,860 tons is actually 11,316 tons. (That's a small error, but notice it is in the direction of *underestimating* carbon loss.) Moreover, the *percentage* loss is irrelevant to any analysis or conclusions in the DEIR; only the total carbon loss (in tons CO<sub>2</sub>e) counts.

##### Carbon Loss From Thinning the Mount Sutro Reserve

So how much CO<sub>2</sub> will the Mount Sutro Management Plan release into the atmosphere? We present a calculation with the largest of the DEIR errors corrected, as discussed above:

<sup>3</sup> Ibid. Figure 4.1, page 6, (1% total forest carbon in understory is 6.67% of 15% total forest carbon in tree boles.)

<sup>4</sup> Wayburn, L., Franklin, J.F., Gordon, J. C., Binkley, C. S., Mladenoff, D. J., Christensen, N. L., Jr. 2000. Forest carbon in the United States. *Pacific Forests* 3(2): 44 pgs, page 6.

	UCSF DEIR		CORRECTED	
	CO2e/acre (tons/acre)	CO2e (tons)	CO2e/acre (tons/acre)	CO2e (tons)
CO2e from trees > 5" DBH				
Trunks, 62/acre remain, 46 acres	410	18860		
Trunks, 48/acre remain, 44 acres			461	20284
Trunks, 12/acre remain, 2 acres			592	1184
Roots, limbs, leaves, bark, 46 acres	0	0		
Roots, limbs, leaves, bark, 44 acres			461	20284
Roots, limbs, leaves, bark, 2 acres			592	1184
CO2e from trees < 5" DBH				
Trunks	0	0	40	1840
Roots, limbs, leaves, bark	0	0	40	1840
CO2e from understory	0	0	38	1748
Total for 46 acres cleared		18860		48364
After 40% discount (an error)		11286		
<b>Total CO2 released</b>		<b>11,286 tons</b>		<b>48,364 tons</b>

Thus 48,364 tons is a far better estimate of the CO<sup>2</sup> release than the 11,286 tons calculated in the DEIR.

For context, the EPA estimates that the average car in the US emits 5.725 tons of CO<sup>2</sup> per year, so the 48,364 tons of CO<sup>2</sup> released by the Mount Sutro project is equivalent to the annual emissions of 8,448 automobiles. The DEIR argues that the project's carbon emissions should be viewed as spread over 30 years, "the life of the project." (DEIR page 4.6-21) From that point of view, the 48,364 tons of CO<sup>2</sup> released is equivalent to putting 282 additional cars on the road for the next 30 years.

#### Cumulative Impact of carbon emissions

The DEIR claims there is no cumulative impact from the Mount Sutro project's CO<sup>2</sup> emissions because, "No other similar large vegetation removal projects in San Francisco were identified." (DEIR page 4.6-24) It's not clear what to make of such a peculiar statement. The DEIR specifically mentions the San Francisco Recreation and Park Department (SFRPD) as one of the local agencies whose environmental documents were reviewed. Yet no mention is made of SFRPD's Significant Natural Resource Areas Management Plan<sup>5</sup> (SNRAMP) nor the DEIR prepared for that plan. The SNRAMP was published in February 2006, and the DEIR<sup>6</sup> for that plan was published in August 2011.

SNRAMP is very definitely a "large vegetation removal project in San Francisco." The plan says the Natural Areas Program (NAP) will remove 3424 trees within San Francisco<sup>7</sup> and 15,147 trees in Sharp

<sup>5</sup> San Francisco Recreation and Park Department, Significant Natural Resource Areas Management Plan, Final Draft, February 2006.

<sup>6</sup> Environmental Impact Report, Significant Natural Resource Areas Management Plan, Planning Department Case No. 2005.1912E, State Clearinghouse No. 2009042102, August 2011.

<sup>7</sup> SFRPD, SNRAMP, Appendix F, page F-6.

Park<sup>8</sup> for a total of 18,571 trees. NAP counts only trees greater than 15 feet in height, roughly equivalent to the 5 inch DBH threshold used by the Mount Sutro DEIR. In addition to those trees, NAP will remove countless smaller trees (which RPD chooses not to call "trees"). Assuming the trees removed by NAP contain as much carbon as the trees on Mount Sutro (7.26 tons CO<sub>2</sub>e per tree, including trunk, roots, leaves, branches, and bark), the NAP project will release  $7.26 \times 18,571 = 134,825$  tons of CO<sub>2</sub> from the larger trees. The trees within San Francisco by themselves will yield  $7.26 \times 3424 = 24,858$  tons CO<sub>2</sub>. These are underestimates because carbon released by the countless small trees and understory removed by NAP is not included.

These are large amounts of CO<sub>2</sub>, of the same order of magnitude as the amount to be released by the Mount Sutro project. It is simply not credible to claim that there is no cumulative effect when both the NAP project and the Mount Sutro project are taking place at essentially the same time in the San Francisco area.

The DEIR also ignores the major tree removal currently taking place in the Presidio.

It is not credible, even embarrassing, for UCSF to claim the carbon released from Mount Sutro Forest will have no cumulative impact because there are no similar projects in the area. The Mount Sutro project will release a great deal of CO<sub>2</sub> to the atmosphere which will join the CO<sub>2</sub> released by other well-known projects in the area. Of course there will be cumulative impact.

Sincerely,



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Cc: Regents of the University of California

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<sup>8</sup> SFRPD, SNRAMP, Appendix F, page F-14.

February 26, 2013

Diane Wong, Environmental Coordinator  
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Box 0286  
San Francisco, CA 94143-0286

Re: UCSF Mount Sutro Reserve Management Project/Draft Environmental Impact Report

### **Impact on Birds from UCSF Forest Thinning on Mount Sutro**

The proposed thinning of the forest on Mt Sutro will be devastating to the birds that live there.

The thinning will be radical: Currently there are approximately 740 trees per acre on the reserve. (DEIR page 3-5) 175 of them are greater than 5 inches DBH (Table 1, Appendix F), and 565 are less than 5 inches DBH. The thinning will remove all 565 of the smaller trees and 113<sup>1</sup> of the trees greater than 5 inches DBH (DEIR Appendix F). Thus a total of 678 trees, 92% of the trees present, will be removed from each acre. In addition the understory will be removed by mowing, and kept down by mowing, goat grazing and herbicides (DEIR p. 3-15). Dense forest will be converted to open woodland, a wholly different habitat.

The many birds found on Mt. Sutro are there because it is a forest and forest is their habitat. The DEIR lists some of the birds which use Mt. Sutro (p. 4.3-5 and 4.3-6), but there are many others as well. They will all be adversely affected. It is often claimed (or implied as in the discussion of Anna's and Allen's hummingbirds on page 4.3-6) that removing the forest will substitute new, different birds for the birds currently there. This is false. Anna's and Allen's hummingbirds are also found in the forest on Mt. Sutro; they use both the forest and the open native plant garden. The eucalyptus on Mt. Sutro supply nectar year round, including in winter when virtually nothing else is blooming.

In Spring 2010, I went on a bird walk on Mt. Sutro and Twin Peaks with a leader who intended to show the group the many birds he believed preferred the open habitat of Twin Peaks to the forest habitat of Mt. Sutro. We found 30 species in the forest, three in the native plant garden (all of which were in the forest as well), and three on Twin Peaks (two of which were in the forest as well). It bears repeating that there are many birds on Mt. Sutro because it is a forest.

It is not simply the trees that make the forest good bird habitat. The DEIR lists Pacific wren as a breeder on Mt. Sutro (p. 5.3-5). Pacific wren specifically uses the dense, dark undergrowth of the forest, and will not use open woodland. But the undergrowth is to be cleared, which will clear out the Pacific wren.

The DEIR dismisses possibility of adverse impact by assuring the public that clearing will not be done during nesting season, and will not destroy any active nests. This may satisfy legal requirements,

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<sup>1</sup> 113 is calculated in Appendix F as the number of larger trees to be removed per acre, based on the fiction that 30 foot spacing of trees is equivalent to 62 trees per acre. You can not fit 62 trees in an acre with 30 foot spacing. A more realistic number is 48 per acre, meaning 127 per acre would be removed.

but is no consolation to the birds that will arrive at Mt. Sutro to find the forest gone. Destroying habitat is far more harmful to bird populations than destroying the active nests of a single nesting season. When active nests are destroyed, birds build new ones, even if they have to wait until the next year. The destruction of habitat removes not only nesting sites but food, cover, and roosting sites as well. When habitat is destroyed the birds are simply gone.

The UCSF Mount Sutro project will destroy habitat used by many bird species and replace it with habitat used by fewer bird species. The project will have an adverse impact on the birds.

Sincerely,



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**Mary McAllister**  
**marymcallister@comcast.net**

February 26, 2013

Diane Wong, Environmental Coordinator  
UCSF Campus Planning  
PO Box 0286  
San Francisco, CA 94143-0286

**RE: Draft Environmental Impact Report for UCSF Mount Sutro Management Project**

Dear Ms. Wong:

Enclosed is my public comment on the Draft Environmental Impact Report (DEIR) for the UCSF Mount Sutro Management Project. The DEIR is mandated by law and my public comment is therefore written within the context of that law. However, this cover letter is written from my heart.

As UC alumna (UCB BA & MBA) and retired staff (UCB & UCSF), the proposed project embarrasses me:

- The project will damage the environment by increasing air pollution and releasing tons of carbon dioxide into the atmosphere as well as significantly reduce the ability of the forest to sequester carbon for decades into the future.
- The project will significantly increase the risk of wildfire by eliminating the windbreak and reducing moisture on the forest floor.
- The project will subject UCSF's neighbors to wind and noise from which they are currently sheltered by the dense forest.
- The project is based on unscientific assumptions regarding the superiority of native plants. Nativism is an ideology, not a science. That a world-class scientific institution would subscribe to nativism is shameful.
- UCSF is a public institution which is funded by taxpayers for the purposes of educating medical professionals, providing patient care, and conducting bio-medical research. It is therefore a violation of the public's trust that public funds would be used for a massive native plant restoration which serves no useful purpose.
- In the past 5 years, UC has been under extreme financial pressure which has forced UC to significantly increase student tuition. These huge increases in tuition are impoverishing UC's students and crippling their futures with debt. How can UCSF explain this pointless project to its students?

As you undoubtedly know, the neighbors of UCSF have been fighting against this destructive project for nearly 15 years. It should also be clear to you that we will continue to do so. In addition to wasting your limited resources on this project, you will also be forced to defend this project from legal challenge.

Please reconsider this irresponsible course of action.

Sincerely,



Mary McAllister

Cc: Regents of University of California

**Public Comment  
Draft Environmental Impact Report  
UCSF Mount Sutro Management**

**Introduction**

The most significant deficiencies in the Draft Environmental Impact Report (DEIR) for UCSF Mount Sutro Management are:

- The DEIR does not acknowledge that destroying over 30,000 trees will reduce air quality in San Francisco
- The proposed project violates California law AB32 and UCSF policy regarding reduction of Greenhouse Gases
- The proposed project will substantially increase the risk of wildfire
- The mitigation proposed by the DEIR for increased windthrow hazard resulting from the proposed project is fallacious

In addition to these failures to acknowledge significant environmental damage caused by the proposed project, the DEIR is riddled with unsupported assumptions about the superiority of native plants and trees for which there is no scientific evidence. For example, it ignores the existence of Sudden Oak Death in San Francisco and the forecasts of widespread death of oaks in the future. This and other failures to fairly and accurately weigh the costs and benefits of the proposed project underestimate the likely environmental damage of the project.

**4.2 Air Quality**

The DEIR's analysis of the impact of the proposed project on air quality is inadequate because it considers only the emissions from equipment used during the project. It does not consider the increased air pollution that will result from the destruction of over 30,000 trees and the removal of 90% of the shrubs in the understory.

The DEIR claims that the thinned forest will have 62 trees per acre. (DEIR Appendix F) The DEIR arrives at this figure by assuming that each tree will occupy a circle with a radius of 15'. In fact, it is not possible to pack circles into another geometric space, whether it is bigger circle, a rectangle or a square without wasting space. Therefore, this calculation arrives at a bogus answer which is larger than is physically possible. We have calculated the number of trees remaining in the thinned forest based on the number of squares in an acre that are 30' X 30'. Such calculations of tree density are found in books regarding arboriculture, which corroborates that we are using a standard calculation used by the timber industry and the DEIR is not.<sup>1</sup>

48.4	$43560/900 =$ trees per acre if 30 feet apart
12.1	$43560/3600 =$ trees per acre if 60 feet apart
45000	Total Number of Trees Existing Now
34040	46 acres X 740 trees/acre = Number of Trees Existing in Project Area
2112	44 acres X 48 trees/acre = Number of Trees in Thinned Forest
24	2 acres (Demo Area #4) X 12 trees/acre = Number of Trees in Thinned Area 4
31904	Existing Trees - Thinned Forest = <b>Trees Removed in Project Area</b>
70.9%	Trees Removed/Existing Trees = Percent of Trees Removed in Total Forest

In the event that UCSF chooses to deny the geometric realities of thinning the forest, I suggest they refer to the DEIR for a close approximation of the number of trees their project proposes to destroy: *"Under full or worst-case implementation of management activities under the proposed project, **approximately 60% of all existing trees, including***

<sup>1</sup> Ecology and Silviculture of Eucalypt Forests, R.G. Florence, CSIRO, Australia

**large and small trees, could be removed from the Reserve...**" (DEIR 2-1). The DEIR reports that there are now 45,000 trees in the reserve. **Sixty percent of 45,000 is 27,000 trees that the DEIR announces will be destroyed** by the fully implemented plan. In other words, our calculation of the number of trees that will be removed by this project is not vastly different from the number of trees which the DEIR announces will be destroyed. In either case, a huge number of trees will be destroyed by the proposed project.

The survey of San Francisco's urban forest conducted by the US Forest Service provides an estimate of how much pollution these trees are now removing from San Francisco's air.<sup>2</sup> This survey estimates that there are 669,000 trees in San Francisco. According to the survey, trees and shrubs in San Francisco are removing 260 tons of pollutants from the air every year:

*"Pollution removal by trees and shrubs in San Francisco was estimated using the UFORE model in conjunction with field data and hourly pollution and weather data for the year 2000. Pollution removal was greatest for particulate matter less than 10 microns (PM10), followed by ozone (O3), nitrogen dioxide (NO2), sulfur dioxide (SO2), and carbon monoxide (CO). It is estimated that trees and shrubs remove 260 tons of air pollution (CO, NO2, O3, PM10, SO2) per year with an associated value of \$1.3 million (based on estimated national median externality costs associated with pollutants<sup>12</sup>). Trees remove about 19 percent more air pollution than shrubs in San Francisco."*<sup>3</sup>

If the destruction of over 30,000 trees results in increased pollution proportionate to the entire urban forest of San Francisco, **we predict increased pollution of over 23,318 pounds of pollution per year.**

The DEIR assumes that the trees remaining after implementation of the proposed project will grow larger when they are released from competition. We will challenge that assumption in the context of the discussion of section 4.6 Greenhouse Gas Emissions of the DEIR. We mention it here because increased air pollution will not be mitigated in the long term if the growth of the few remaining trees does not compensate for the destruction of over 30,000 trees. Furthermore, the project proposes to destroy 90% of the existing understory and prevent its regeneration in the long term by destroying it at least annually for 5 years and mulching the ground to prevent germination. Therefore, there is no long term mitigation anticipated by the regeneration of the understory destroyed by the proposed project.

**Increased air pollution resulting from tree and understory removal should be quantified by the Final EIR and compared to legal thresholds to determine if the environmental impact of the project on air quality will be significant. If so, mitigation for increased pollution should be identified by the final EIR.**

#### 4.3 Biological Resources

The DEIR's conclusion that the proposed project will not have a significant impact on biological resources in the Sutro Open Space Reserve is based on the following misstatements of fact:

1. *"Native insect [population] within the Reserve is expected to be low because of the dominance of non-native eucalyptus."* (DEIR, 4.3-5) Although this statement is frequently made by native plant advocates, there is no scientific evidence to support this statement. In fact, available scientific evidence contradicts this statement.

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<sup>2</sup> "Assessing Urban Forest Affects and Values: San Francisco's Urban Forest," US Forest Service, February 2007. [http://nrs.fs.fed.us/pubs/rb/rb\\_nrs008.pdf](http://nrs.fs.fed.us/pubs/rb/rb_nrs008.pdf)[http://nrs.fs.fed.us/pubs/rb/rb\\_nrs008.pdf](http://nrs.fs.fed.us/pubs/rb/rb_nrs008.pdf)

<sup>3</sup> Ibid. page 7

The scientist who is most often quoted to support beliefs of native plant advocates is Doug Tallamy who wrote an influential book, Bringing Nature Home: How Native Plants Sustain Wildlife in our Gardens .<sup>4</sup> Professor Tallamy is an entomologist at the University of Delaware.

Professor Tallamy's hypothesis in that book was that native insects require native plants because they have evolved together "over thousands of generations." Because insects are an essential ingredient in the food web, he speculates that the absence of native plants would ultimately result in "ecological collapse" as other animals in the food web are starved by the loss of insects.

Professor Tallamy freely admits in that book that his theory was based on his own anecdotal observations in his garden, not on scientific evidence: "How do we know the actual extent to which our native insect generalists are eating alien plants? We don't until we go into the field and see exactly what is eating what. Unfortunately, this important but simple task has been all but ignored so far."

This research has now been done to Professor Tallamy's satisfaction by a Master's Degree student under his direction. **The report of that study does not substantiate Professor Tallamy's belief that insects eat only native plants. In his own words, Professor Tallamy now tells us:**

*"Erin [Reed] compared the amount of damage sucking and chewing insects made on the ornamental plants at six suburban properties landscaped primarily with species native to the area and six properties landscaped traditionally. After two years of measurements Erin found that only a tiny percentage of leaves were damaged on either set of properties at the end of the season....Erin's most important result, however, was that **there was no statistical difference in the amount of damage on either landscape type.**"<sup>5</sup> (emphasis added)*

A local study also that found that non-native plants and trees—including eucalyptus—support as many insects as native plants and trees. Professor Dov Sax (Brown University) compared insects living in the leaf litter of the non-native eucalyptus forest with those living in the native oak-bay woodland in Berkeley, California.<sup>6</sup> He found significantly more species of insects in the leaf litter of the eucalyptus forest in the spring and equal numbers in the fall. Professor Sax also reports the results of many similar studies all over the world that reach the same conclusion.

The DEIR does not mention the impact of the project on bees. Granted, bees are not a legally protected species, so the DEIR is not legally obligated to analyze the impact on bees. Honeybees are dependent upon the existing eucalyptus forest to survive the winter months because the eucalypts provide the sole source of nectar during the coldest winter months. Most native bees are hibernating in the ground during the coldest winter months. They will not be able to nest in the ground on Mount Sutro when this project is complete because 46 acres of the Sutro Reserve will be covered in heavy wood chip mulch which native bees cannot penetrate.<sup>7</sup> We mention the impact on bees because it has implications for the success of the project. Bees or other pollinators are needed for the reproductive success of the native plant garden which is the long term goal of the proposed project.

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<sup>4</sup> Tallamy, Doug, Bringing Nature Home, Timber Press, 2007

<sup>5</sup> Tallamy, Doug, "Flipping the Paradigm: Landscapes that Welcome Wildlife," chapter in Christopher, Thomas, The New American Landscape, Timber Press, 2011

<sup>6</sup> Dov Sax, "Equal diversity in disparate species assemblages: a comparison of native and exotic woodlands in California," Global Ecology and Biogeography, 11, 49-52, 2002

<sup>7</sup> Gordon Frankie, UC Berkeley, [http://nature.berkeley.edu/urbanbeegardens/general\\_mulchmadness.html](http://nature.berkeley.edu/urbanbeegardens/general_mulchmadness.html)

2. Removing trees outside of nesting season or avoiding occupied nests during nesting season will ensure that birds and Monarch butterflies are not harmed by the proposed project. (DEIR assumption)

Firstly, the nesting season is variable and not predictable, particularly in a time of rapidly changing climate.

Secondly, if trees are removed when birds are nesting, we cannot assume that occupied nests can be identified. For example, the nest of a hummingbird is typically about the size of a quarter. Someone on the ground—even if highly qualified—will not be able to see small nests in tall trees.

Most importantly, these measures are useless going forward. That is, even if the project is able to avoid destroying nests during the season in which the trees are destroyed, these trees will not be available for nesting in the future. The project will eliminate nesting opportunities for decades into the future. This factor is closely related to the third misstatement of fact, which follows.

Virtually all of the birds found in the Sutro Open Space Reserve, according to the DEIR, are forest species. The only special status species, the Olive-Side flycatcher, nests in forests and chooses a conspicuous treetop perch from which it hunts large insects, according to *Sibley Guide to Birds*. The sole Olive-Sided flycatcher seen in the Sutro Open Space Reserve was in the East Bowl, where the proposed project will destroy the most trees, reducing trees per acre to approximately 12 with 60 foot spacing. The Monarch butterfly requires protection from the wind for its overwintering habitat. The removal of most of the trees on Mount Sutro will greatly increase the wind on the few remaining trees. These protected species will be negatively impacted by the proposed project.

3. *“The relatively limited amount of vegetation removal that would occur within the Reserve will not interfere substantially with the movement of existing wildlife through the Reserve.”* (DEIR, 4.3-20)

The DEIR informs us that 60% of the existing forest and 90% of the existing understory will be destroyed by the proposed project. Surely, reasonable people can agree that this is not a “relatively limited amount of vegetation removal.” A significant portion of the existing forest vegetation will be destroyed by the project and its destruction will obviously “interfere substantially with the movement of existing wildlife through the Reserve.”

4. *“Implementing the proposed project is expected to be beneficial [to biological resources] and would increase the amount and variety of wildlife habitat would improve habitat connectivity and biodiversity, would reduce non-native and invasive vegetation and would increase native vegetative cover.”* (DEIR, 4.3-23)

**Habitat connectivity will not be improved by removing 90% of the existing understory vegetation** and preventing its regeneration by mowing it or spraying it with herbicides for 5 years. Regeneration of the understory will also be suppressed by the distribution of heavy wood-chip mulch from the destroyed trees. The wood-chip mulch will have no food or cover value for wildlife and will not be a substitute for the existing understory. The DEIR description of the benefit of the project to wildlife is clearly a misstatement of fact.

Also, **the eradication of all non-native vegetation does not improve biodiversity**. Biodiversity is defined by science as a function of two variables: species richness and species abundance.<sup>8</sup> Species richness is the number of different species in a given area. Science does not differentiate between native and non-native species in quantifying species richness. Indeed, nativity of many orders of animals cannot be accurately identified, given wide variations in

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<sup>8</sup> Gorelick, R., “Combining richness and abundance into a single diversity index using matrix analogues of Shannon’s and Simpson’s indices,” *Ecography*, 29: 4, 525-530, August 2006

dispersal and migration of species. Species abundance is the number of individuals of each species found in a given area. The more evenly distributed the number of individuals of each species found, the greater the diversity in that area. In other words, the most biodiverse area is one with the greatest number of species with the most evenly distributed number of individuals of each species. Since the proposed project does not plan to plant most of the areas where the non-native species will be eradicated, we cannot assume that the project will result in greater biodiversity. We should assume that the final result will be less biodiversity.

#### 4.5 Geology and Soils

The DEIR predicts that the soil of the Sutro Open Space Reserve will not be destabilized by the destruction of over 90% of the trees and vegetation on 46 acres of the reserve. This prediction is based on the following **DEIR assumptions**:

- The roots of the trees that are destroyed will not decompose for at least 5 years, despite the fact that the stump will be prevented from resprouting by the application of herbicides or the tarping of the stump.
- The roots of the few trees that remain will grow so quickly that they will compensate for the decomposition of the roots of the trees that are destroyed.

These assumptions do not take into account that the root system of the eucalyptus forest on the Sutro Open Space Reserve is likely fused because of the density of the forest and its existence for over 120 years. In other words, the fate of the roots of one tree is also the fate of its neighbors. This observation has been made by three local arborists in San Francisco, including the forester representing UCSF, Ray Moritz, during a walk in the forest with Sutro neighbors.

The fusion of the root system means that damage inflicted on the roots of the trees that are removed, will simultaneously inflict damage on the trees that remain. Particularly if herbicides are used to kill the roots of the trees that are destroyed, scientific experiments inform us that the roots of adjacent trees will also be damaged.<sup>9</sup> If herbicides are also used to destroy the entire understory of the forest, we should expect that the roots of the few remaining trees will be damaged.

**If the roots of the eucalypts are indeed fused, as arborists predict, it will not be possible to kill the roots of some eucalypts without killing the roots of all eucalypts in the forest.** Herbicides sprayed on the stumps of the eucalypts that are destroyed will travel to the roots of the remaining trees, killing them, as we have said. Tarping the stumps of the eucalypts that are destroyed will not kill the roots of that tree because the roots of the destroyed trees will stay alive by drawing food and moisture from the trees that remain. The source of this information is a personal communication from Professor Joseph McBride of UC Berkeley.

#### 4.6 Greenhouse Gas Emissions

##### Calculation of stored carbon and loss

The DEIR's calculation of stored carbon in existing trees apparently does not include any trees less than 5" DBH. The 6 study plots selected to inventory the trees contain only 173 trees per acre greater than 5" DBH. Since the average number of trees per acre throughout the forest is reported by the DEIR as 740 trees per acre, **carbon loss is calculated based on an assumption that 576 trees per acre or 77% of the forest is less than 5" DBH.**

The DEIR explains the criteria for selecting the 6 study plots: "To capture the variability across the Reserve, variable slopes, aspects and topographies were sampled..." (DEIR 4.6-15). In other words, the study plots were not selected randomly. Can the final EIR assure us that the study plots are representative of the entire project area? For example,

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<sup>9</sup> Stott W. Howard, *Chemical Control of Woody Plants, Stumps, and Trees*, Washington State University, 1993

how does the tree density in the study plots compare to the “10 representative 100’ long transects located throughout the Reserve,” that were inventoried by Hort Science in 1999?<sup>10</sup> Is there any reason why that inventory wasn’t used to calculate carbon storage in the existing forest?

Based on the Hort Science inventory, the composition of the forest is described by the DEIR: “Most trees are less than 12 inches in diameter.” (DEIR 3.5) A forest in which 77% of the trees are 5” DBH or less is a forest with significantly smaller trees than a forest in which “most of the trees are less than 12” in diameter.”

Also, Appendix A, the Biological Resources Report, says of the size of the trees in the forest, “The eucalyptus forest that covers the majority of the Reserve is primarily a monotypic stand dominated by blue gum eucalyptus (*Eucalyptus globulus*) with an average trunk size of single leader trees ranging from 24-42 inches in basal diameter.” The definition of “basal diameter” is the diameter of the trunk at breast height, according to Wikipedia. And the definition of “single leader tree” is a tree with one trunk. If the average diameter of most of the trees in the forest (82% of the forest is blue gum, according to the DEIR) is 24-42 inches, how is it physically possible for 77% of the trees in the forest to be 5 inches in diameter or less? Surely that is a mathematical impossibility.

Another indication that the study plots used to calculate carbon storage are not representative of the entire forest is that the average DBH of living, standing trees over 5” DBH in the study plots is 14.24” DBH. This is obviously significantly smaller than other sources of information cited above. **We do not find the study plots used to calculate carbon storage credible with respect to being representative of the entire forest.**

The calculation of stored carbon of the thinned forest assumes that each remaining tree will occupy a circle with a radius of 15’. Since it is not physically possible for circles to be packed into another space of any shape without wasting space, this calculation has no practical meaning in the real world. Such a calculation assumes that 62 trees per acre will remain in the thinned forest. In fact, if each tree occupies a 30’ X 30’ square, there will be 48 trees per acre in the thinned forest. This is the density that should be used to calculate the loss of stored carbon. This method of calculating tree density in the forest is standard in arboriculture.<sup>11</sup>

The calculation of the loss of stored carbon resulting from the thinning of the forest does not take into account that 2 of the 46 acres to be thinned will be thinned to spacing of 60’ between each tree. That will result in only 12 trees per acre on the 2 acres thinned to that standard.

According to the DEIR, the calculations also **exclude** the following sources of stored carbon: the understory, the forest floor layer (e.g., duff and litter), the bark, roots, and branches of the trees, and the soil. The DEIR reports that the shrub and forest floor “constitute less than 5% of the average forest carbon pool.” (DEIR 4.6-15) Elsewhere, the DEIR claims that the understory accounts for 5% of the forest carbon pool. (DEIR 4.6-14). These statements are contradictory. They are also inconsistent with the original source of information cited by Wayburn about where carbon is stored in forest ecosystems in the United States.<sup>12</sup>

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<sup>10</sup> “Mount Sutro Open Space Reserve Maintenance and Restoration Plan,” Hort Science, et, al., 1999

<sup>11</sup> R.G. Florence, *Ecology and Silviculture of eucalypt forests*, CSIRO

<sup>12</sup> “Carbon Changes in US Forests,” RA Birdsey and LS Heath, US Forest Service Gen. Tech. Report RM-GTR-271, 1995

Allocation of carbon in forest ecosystems and trees  
US forests, 1992

1%	foliage	
5%	roots	
15%	bole (trunk)	
9%	other wood above ground	
	29%	tree
	61%	soil
	8%	forest floor
	1%	understory
	99%	Total

It seems that the **calculations of the loss of stored carbon take into account only 15% of the total carbon** in the forest which is stored in the trunk of the trees. If this is not an accurate interpretation of the DEIR and its calculation, the final EIR should clarify how much of the carbon stored in the forest is accounted for in its calculation. If it is an accurate interpretation, we submit that it is a gross underestimate of the carbon loss resulting from this project.

Although we can see the logic of excluding the carbon stored in the soil from the calculation, in fact there is scientific evidence that there will be some loss of soil carbon as a result of this project: "...a major forest disturbance, such as a clearcut harvest, can increase coarse litter and oxidation of soil organic matter. The balance of these two processes can result in a net loss of 20% of the initial carbon over a 10-15 year period following harvest."<sup>13</sup> The destruction of 60% of the trees and 90% of the understory, surely qualifies as a "major forest disturbance" which will result in a loss of carbon stored in the soil of the forest.

Ironically, the reference the DEIR chooses to cite for other claims that it makes regarding carbon storage in forests (Wayburn) acknowledges the scientific evidence that soil carbon is lost when the forest is disturbed. This is one of many examples of the factual "cherry-picking" in which the DEIR engages.

Finally, after reducing the amount of lost carbon by underestimating the number of trees that will be destroyed and counting only the carbon stored in the trunk of the tree, the DEIR calculation of lost carbon delivers the final *coup de grâce* to the forest by reducing the total by 40% based on a claim that the carbon will not be released into the atmosphere for 20 to 100 years. This assumption is attributed to Wayburn in "Forest Carbon in the United States." We have found this quote and here's what Wayburn actually said: "...roughly between 20% and 33% of labile forest carbon ends up in forest products. Up to 40% of this **carbon is stored over the long term in such products as saw timber and furniture**, lasting from 20 or more than 100 years."

Wayburn and her co-authors are writing for the timber industry (an observation not intended to denigrate the timber industry, but rather to establish its irrelevance to the Sutro project). Her publication is therefore based on the assumption that the timber being harvested will be used to build something. Since carbon is only released into the atmosphere when the wood decays, wood that has been used to build a house or a piece of furniture obviously is going to take a great deal longer to decay than wood left on the forest floor to rot, as it will be by the Sutro project. And

<sup>13</sup> "Carbon Changes in US Forests," RA Birdsey and LS Heath, US Forest Service Gen. Tech. Report RM-GTR-271, 1995



clearly, the wood that is chipped into tiny pieces and distributed on the forest floor—as it will be by the Sutro project-- is going to decay much faster than the logs.

**The calculation of lost carbon from the destruction of over 60% of the entire forest on Mount Sutro should not be discounted by 40% because the wood is not being harvested for commercial use. Rather the wood will be left on the forest floor to decay and it will decay much more rapidly than timber which is used to manufacture wood products.**

We would also like to point out the illogical contradiction between the DEIR's claim that 40% of stored carbon should be excluded from the calculation of stored carbon because it will be released in the "long-term"—defined as 20 to 100 years-- while simultaneously claiming that environmental impact of carbon release must only be judged only after 30 years. This is one of many indications that the DEIR is not a good-faith effort to evaluate the environmental impact of the proposed project.

### **Critique of the "Long-Term Scenario"**

The DEIR asks us to believe that the project does not violate the law regarding the loss of stored carbon and/or the loss of the ability of the forest to sequester carbon because 30 years after most of the forest is destroyed, the forest will be capable of sequestering equal amounts of carbon and compensate for some of the loss of stored carbon. (DEIR 4.6-18)

First let us establish that the long-term scenario does not meet the legal standards for judging the significance of carbon loss. The DEIR states that one of the criteria for determining that a project will have a significant effect on the environment is, "Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing greenhouse gases." (DEIR 4.6-17). In fact, **the "long-term scenario" violates the following policies:**

- **[California] Executive Order S-3-05:** "The Executive Order established the following goals: GHG emissions should be reduced to 2000 levels by 2010, 1990 levels by 2020, and 80 percent below 1990 levels by 2050." (DEIR 4.6-6)
- **UCSF Climate Action Plan:** "UCSF is committed to **reduce its GHG emissions from all of its operations** to the 1990 level by 2020, with the eventual goal of achieving carbon neutrality for the campus." (DEIR 4.6-13)

The proposed project will prevent UCSF from fulfilling either of these commitments. Even if it were possible for the forest to be capable of sequestering equal quantities of carbon within 30 years—and it is not, as we will show—this will not compensate for the loss of the stored carbon in the 30,000+ trees that will be destroyed.

**If the final EIR is to meet legal standards, it must identify specific mitigations that will reduce carbon emissions sufficient to compensate for the loss of stored carbon plus the capability of sequestering equal amounts of carbon within the time deadlines of these policies. If the final EIR is unable to identify such mitigation, it must conclude that this project will have a significant impact on the environment.**

### **CEQA requirements for determining significant impact**

The DEIR also violates the law (CEQA) by ignoring one of the tenets of the law which it acknowledges: "Section 15064-4 also states that a lead agency should consider the following factors when assessing the significance of GHG emissions on the environment: (1) **the extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting.**" (DEIR 4.6-17)

In other words, CEQA requires that the impact of the proposed project be compared to existing conditions, not to some theoretical straw man that is created for the purpose of invalidating the actual impact of the project. The DEIR creates a straw man by speculating that the proposed project will reduce risk of wildfires: “Finally, the risk of fire would be reduced with the proposed project as compared to existing conditions or doing nothing....Forest fires contribute to reductions in carbon sequestration and result in the release of substantial amounts of sequestered carbon.” (DEIR 4.6-18)

The fact is, **the forest exists now and the environmental impact of the proposed project must be measured compared to the existing forest, not to some theoretical forest that has been destroyed by a non-existent wildfire.** That’s the law and UCSF would be wise to follow it, as there is a precedent for other public entities being engaged in a legal battle in which this was the primary legal argument (*Hills Conservation Network vs. East Bay Regional Park District*). The East Bay Regional Park District settled with the plaintiffs, including paying their legal costs. Presumably EBRPD perceived the risk of losing the legal battle to be greater than the financial loss imposed by the settlement.

### **Contradictions, irrelevant analogies, unsupported assumptions**

The “long-term scenario” described by the DEIR is rife with contradictions, unsupported assumptions, and irrelevant analogies used to support its claim that within 30 years, the forest will be capable of sequestering equal amounts of carbon as well as recoup some of the stored carbon lost when the trees are destroyed. We will identify a few of these to illustrate a point: The DEIR is an advocacy document, not an analysis of the environmental impact of the proposed project.

1. *“Young, healthy forests absorb carbon more rapidly than older, dense forests...The Reserve is dominated by mature blue-gum eucalyptus forest that was planted in the 1880s. At young ages blue-gum eucalyptus is one of the fastest growing eucalypts. A three-year-old tree has been recorded at 46 feet high and .75 feet in diameter.” (DEIR 4.6.18)*

If, indeed, a three-year old eucalyptus is .75 feet in diameter or 9 inches, the forest is very young if we are to believe the DEIR which has already stated that 77% of all the trees in the forest are less than 5 inches in diameter (if the study plots are representative of the tree density of the entire forest, which is doubtful).

Furthermore, even if all eucalypts in the forest were 130 years old, as the DEIR states, this is not an old blue gum eucalyptus forest. Blue gums live in Australia from 200 to 500 years.<sup>14</sup> They live toward the longer end of the range in milder climates such as the San Francisco Bay Area. The blue gum eucalypts on Mount Sutro are young by any standard.

Finally, it is not true that young trees sequester carbon more rapidly than older trees, because carbon sequestration is largely proportional to biomass and older trees are bigger than young trees.<sup>15, 16</sup> The US Forest Service survey reports that San Francisco’s urban forest is an example of an urban forest in which bigger—and therefore older—trees are sequestering **and** storing more carbon than smaller trees.<sup>17</sup>

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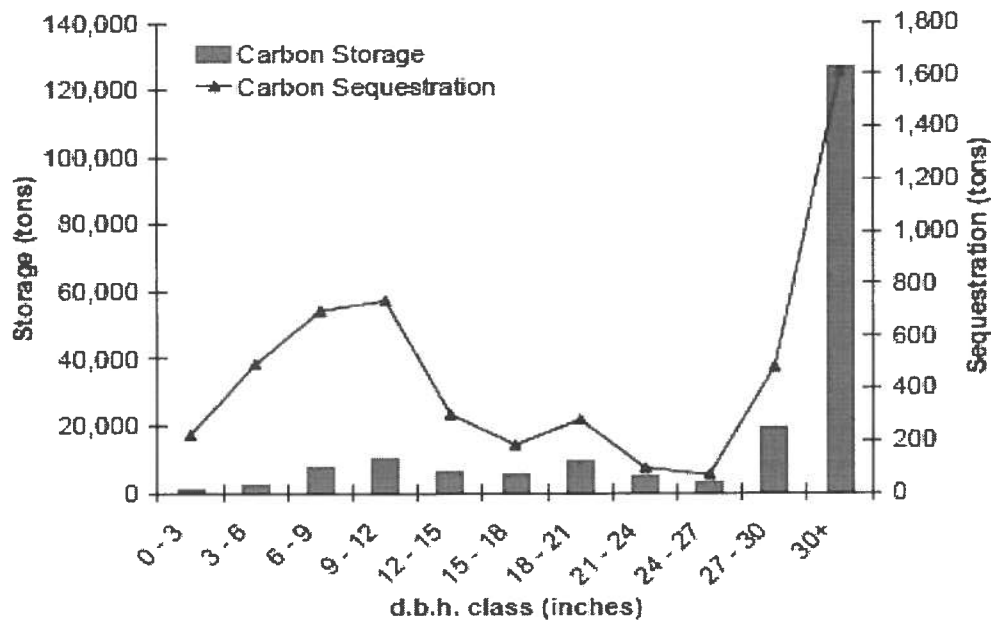
<sup>14</sup> *Eucalypt ecology: Individuals to ecosystems*, by Jann Elizabeth Williams, John Woinarski, Cambridge University Press, 1997

<sup>15</sup> “Old forests capture plenty of carbon,” Emma Marris, *Nature*, September 10, 2008

<sup>16</sup> “Carbon Sequestration and Storage by Gainesville’s Urban Forest,” Francisco Escobeda, et. al., EDIS, 2012

<sup>17</sup> “Assessing Urban Forest Affects and Values: San Francisco’s Urban Forest,” US Forest Service, February 2007.

[http://nrs.fs.fed.us/pubs/rb/rb\\_nrs008.pdf](http://nrs.fs.fed.us/pubs/rb/rb_nrs008.pdf)[http://nrs.fs.fed.us/pubs/rb/rb\\_nrs008.pdf](http://nrs.fs.fed.us/pubs/rb/rb_nrs008.pdf)



2. *"Though numerous articles document growth and yield curves for blue gum eucalyptus, none do so for blue gum greater than 40 years in age. Such research papers are timber- and harvest-oriented and advise harvest of blue-gum between 12 to 30 years of age. These lines of evidence suggest that the Reserve's mature eucalyptus are well past peak growth and are no longer sequestering much if any additional carbon."* (DEIR 4.6-19)

These statements are not relevant to the Sutro Open Space Reserve. The optimal size and age of trees for the purpose of timber harvest is unrelated to the ability of trees to sequester carbon. Those engaged in the timber industry are not harvesting carbon. Rather they are harvesting trees and it is in their economic interest to harvest trees as soon as they are economically valuable, which is clearly long before the tree has reached maturity. The Sutro Open Space Reserve is not engaged in the business of selling timber. Therefore, the optimal age for harvesting timber is not relevant to the evaluation of the proposed project.

3. *"...the opportunity cost of additional carbon that would have been sequestered each year by the growth of trees that were instead felled, would be more than compensated for by the additional growth of remaining trees and understory recruitment as a result of thinning efforts."* (DEIR 4.6-19)

This statement is contradicted by other statements made by the DEIR. The DEIR has already claimed that the forest is old and no longer growing rapidly. The DEIR also says that the biggest—and therefore the oldest—trees are the trees which will remain when 90% of their neighbors on 46 acres are destroyed. In other words, the DEIR claims that the oldest trees are less capable of sequestering carbon, yet it proposes to destroy the youngest trees.

However, since there is no evidence that the forest is either old or that it has stopped growing let us address the claim that the growth of the remaining trees will increase when they are released from competition from their neighbors.

Competition for available resources is not the only factor in the growth of a tree. Its hereditary characteristics will determine its growth rate and eventual size and it will attain that size depending upon the environment in which it exists, including the climate, the quality and depth of the soil, the availability of moisture, its exposure to wind, etc.

Most of these factors will not be changed by the destruction of 90% of the trees neighboring those that remain. Some of the factors —such as increased wind and herbicide use—will hinder the growth of the trees that remain. Therefore, we cannot predict an increased rate of growth that would compensate for the ability of the existing forest to sequester carbon. Frankly, given the scale of the destruction, it seems a fantastic claim that the remaining trees would grow at such a rate in 30 years to achieve that goal.

Furthermore, three local arborists have expressed their opinion that the roots of the eucalypts are fused, which means the fate of the few eucalypts that remain in the forest will be the same as the fate of the eucalypts that are destroyed. If herbicides are sprayed on the stumps of the eucalypts that are destroyed, those herbicides will damage and ultimately kill the trees that remain. If tarps are used on the stumps of the eucalypts that are destroyed, the roots of that tree will siphon resources from the trees that remain. In other the trees that remain will not be “released from competition” as the DEIR speculates.

The DEIR also claims that regeneration of the understory will help to compensate for the loss of carbon sequestration and storage. This claim is contradicted by the DEIR as well as the proposed project:

- The DEIR’s calculation of carbon loss resulting from the project claims that the understory makes such an insignificant contribution to carbon sequestration and storage that it was not included in the calculation: “...as they [carbon calculations] do not factor the shrub or forest floor; these pools, constitute less than 5% of the average forest carbon pool.” (DEIR 4.6-15) The DEIR wishes to discount the carbon stored in the understory when calculating carbon loss, but then it asks to be credited for carbon sequestration when the understory returns.
- The project proposes to destroy 90% of the understory by mowing it or spraying it with herbicides annually for five years. Obviously the project does not anticipate regeneration of the understory for at least 5 years: “Mow, use goat grazing and/or use herbicides...annually or every other year for 5 years, depending upon rate of growth.” (DEIR 3-12)
- The project proposes to spread the wood chips of the destroyed trees on the forest floor to prevent erosion (DEIR 3-15) as well as mulch small trees for distribution on the forest floor (DEIR 4.6-18). These practices will prevent regeneration of the understory by suppressing germination.
- The project does not propose to plant native plants in the forest with the exception of a few small areas, “if money is available.” If the understory is not replanted after 5 years of repeatedly destroying it, we should not anticipate the return of an understory.

**In other words, the DEIR asks us to believe that the understory will return, although it plans to repeatedly destroy it, prevent its regeneration by covering the forest floor with mulch, and not replanting most of the forest. Also, it claims on the one hand that the understory contains an insignificant amount of carbon and on the other that it will eventually compensate for the loss of the carbon storage and sequestration caused by the proposed project.**

Likewise, the DEIR claims that recruitment of new trees will be improved by the destruction of most of the forest: “...more recruitment [of trees] into the understory is projected with the project compared to existing conditions.” (DEIR 4.6-2). **Since the proposed project plans to destroy thousands of saplings and prevent their resprouting by spraying the stumps with herbicide or tarping them, it is clearly a contradiction to suggest that greater recruitment of tree saplings is a target of this project.**

## **Tree mortality**

The DEIR reports that there is “ongoing mortality” in the Sutro Reserve and that this mortality should be expected to continue and perhaps to increase in the future. It uses this observation to justify the destruction of 90% of the forest on 46 acres of the Reserve. In other words, the project proposes to destroy the forest before it has the chance to destroy itself. An analogy comes to mind: “We had to destroy the village to save it,” which was the explanation given for the destruction of a village during the Vietnam War. It didn’t make sense then and it doesn’t make sense now.

“Self-thinning” of the forest is a natural phenomenon and it is the usual means used by arboriculture to thin a forest because it is more efficient than mechanical thinning of the forest.<sup>18</sup> Those who raise eucalypts for economic purposes, plant the trees very densely with the expectation that the forest will “self-thin” over time. The densely planted young trees support one another until they wind harden.

Also, the advantage of allowing the forest to thin itself is that the optimal density of a forest depends upon many variables, most of which are not directly measurable by foresters. These are some of the many factors that determine the optimal density of a forest: the depth of the soil, the nutrients available in the soil, the availability of moisture, the climate, the wind, etc. Furthermore, in a complex topography, such as Mount Sutro, these factors are variable throughout the reserve. The optimal density is not uniform throughout the Reserve. Self-thinning will therefore produce a variable density throughout the Reserve depending upon the availability of resources which would be more optimal than the uniform density of 48 trees per acre proposed by the project.

Foresters also prefer to “self-thin” the forest because mechanical thinning is expensive and it damages the trees that remain. The proposed project will undoubtedly damage many of the trees which it claims it intends to retain. For that reason, it is likely that the forecasted tree density is an over-estimate of the result of such a drastic thinning of the forest.

## **Reducing fuel loads causes carbon loss without reducing fire hazard**

As we have said, the DEIR uses the potential for wildfire as a justification for the proposed project, based on speculation that a wildfire would cause loss of stored carbon. We have also said that this is not a valid legal argument because environmental impact must be evaluated by comparing the proposed project to existing conditions, not to some theoretical condition, such as a forest destroyed by wildfire.

Furthermore, a recently published study corroborates that thinning the forest does not significantly reduce fire risk, nor does it increase carbon storage in the forest<sup>19</sup>

*“It has been suggested that thinning trees and other fuel-reduction practices aimed at reducing the probability of high-severity forest fire are consistent with efforts to keep carbon (C) sequestered in terrestrial pools, and that such practices should therefore be rewarded rather than penalized in C-accounting schemes. By evaluating how fuel treatments, wildfire, and their interactions affect forest C stocks across a wide range of spatial and temporal scales, we conclude that this is extremely unlikely. Our review reveals high C losses associated with fuel treatment, only modest differences in the*

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<sup>18</sup> R.G. Florence, *Ecology and Silviculture of eucalypt forests*, CSIRO

<sup>19</sup> John L. Campbell, Mark E. Harmon, Stephen R. Mitchell, “Can fuel-reduction treatments really increase forest carbon storage in the western US by reducing future fire emissions? *Frontiers in Ecology and Environment*, 2011, 10,1890/110057.

***combustive losses associated with high-severity fire and the low-severity fire that fuel treatment is meant to encourage, and a low likelihood that treated forests will be exposed to fire. Although fuel-reduction treatments may be necessary to restore historical functionality to fire-suppressed ecosystems, we found little credible evidence that such efforts have the added benefit of increasing terrestrial C stocks.***” (emphasis added)

**Thinning the forest will not reduce fire hazard. Nor will it prevent loss of stored carbon.**

### **Cumulative Impacts**

The DEIR claims to have reviewed the plans for projects throughout the San Francisco area, yet it reaches this bizarre conclusion: “No other similar large vegetation management activities in San Francisco were identified.” (DEIR 4.6-24) This is a blatant misstatement of fact.

The Recreation and Park Department is engaged in massive tree-removal projects. Its Natural Areas Program intends to destroy 18,500 trees over 15 feet tall and countless smaller trees which it chooses not to define as trees. In addition to these projects, the Recreation and Park Department is evaluating the trees in the parks for the first time in decades. As each park is evaluated, hundreds of trees are being destroyed because they are considered hazardous. Also, the voters have provided the Recreation and Park Department with hundreds of millions of dollars for many capital projects. Each of these capital projects is resulting in the destruction of more trees. The full scale of all of these projects is not yet known, but within the implementation period of the proposed project on Mount Sutro, tens of thousands of trees will be destroyed on the public lands of the San Francisco peninsula.

The GGNRA and the Presidio are also engaged in many similar projects, which destroy non-native trees for the purpose of converting landscape from non-native forest to native grassland and dune scrub. The converted landscape will not be capable of sequestering or storing as much carbon as the trees that are being destroyed because grassland and dune-scrub which are native to the Bay Area are not capable of sequestering or storing as much carbon as large trees.

If, indeed, the authors of the DEIR have read the plans of these public entities as they claim, they are well aware that it is not accurate to say that there are “no other similar large vegetation management activities in San Francisco.” The cultish veneration of native plants has infected all managers of public land in the San Francisco Bay Area.

### **4.7 Hazards – Fire Hazards**

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 a native landscape would make us safer. Nothing could be further from the truth. The fact is that the forest—whether it is native or non-native—is generally less flammable than the landscape that is native to California. In the specific case of the Sutro Forest in San Francisco, this general principal is particularly true: the existing forest is significantly less flammable than the landscape that is native to that location.

UCSF’s “Mount Sutro Management Plan” describes “native” Mount Sutro as follows: “In the 1800s, like most of San Francisco’s hills, Mount Parnassus [now known as Mount Sutro] was covered predominantly with coastal scrub chaparral [sic], consisting of native grasses, wildflowers, and shrubs...” (page 4)

*A Natural History of California*<sup>20</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)

### **Wildfire history in the Bay Area**

The fire on Angel Island in October 2008 is misrepresented by the DEIR. This fire 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 15 years ago in order to restore native grassland. Only 6 acres of eucalyptus remain.<sup>21</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>22</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 eucalypts are highly flammable. And in that case there is no doubt that they were involved in that devastating fire, although the FEMA technical report on that fire<sup>23</sup> also clearly states that the eucalypts were neither the cause of that fire nor the primary fuel of the fire.

The role that the eucalypts played in the 1991 fire in the East Bay is greatly exaggerated by native plant advocates. As FEMA notes in their analysis of that fire, the fire started in dry grass (“On...October 19, 1991...a brush fire was reported...the vegetation on the slope was mostly grass with some brush and a few trees.” Page 22 of FEMA Technical Report on 1991 Fire) and only leapt out of control when a spark reached nearby brush (On October 20, 1991, “Very suddenly, the fire flared up...Burning embers had been carried from one of the hot spots to a patch of tinder dry brush.” (Page 26).

Furthermore, 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 and the bay. It is cooler in the summer and warmer in the winter. There are never prolonged, hard freezes in San Francisco that cause the eucalyptus to die back, creating dead, flammable leaf litter. The 1991 fire in the Oakland hills occurred in the fall, following a hard winter freeze that produced large amounts of flammable leaf litter. In fact, there were several wildfires in the Oakland hills in the 20<sup>th</sup> century. Each followed a hard winter causing vegetation to die back.

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<sup>20</sup> Allan Schoenherr, UC Press, 1992, page 341

<sup>21</sup> “Rains expected to help heal Angel Island,” SF Chronicle, October 14, 2008

<sup>22</sup> “After fire, Angel Island is a park of contrasts,” SF Chronicle, October 15, 2008

<sup>23</sup> FEMA Technical Report on 1991 Oakland Fire, <http://www.usfa.dhs.gov/downloads/pdf/publications/tr-060.pdf>

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>24</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.

The DEIR also misrepresents a fire on Mount Sutro in 1899 by suggesting it is an indicator of existing fire hazards on Mount Sutro. Tree planting on Mount Sutro began in 1886. Therefore, the trees on Mount Sutro were no more than 13 years old at the time of this “great fire.” It is likely that the native chaparral was more prevalent than the young trees. The *San Francisco Chronicle* reported on October 10, 1899 (the day after the fire): “No serious damage was done, however, except the destruction of the **undergrowth.**” Fighting the fire was described as, “...water turned upon the flaming **thickets.**” (emphasis added)

Wind did not exacerbate this fire, “if a high wind had been blowing yesterday, great damage would have resulted.” The *San Francisco Call* of the same day concurred, “The fact that there was not a breath of wind blowing was the only thing that saved the western part of the city from serious damage.”

The DEIR attempts to use the fire of 1899 to support its claim that the Sutro Forest is highly flammable, and is most dangerous in the fall. In fact, this fire does the opposite. It indicates that the chaparral that preceded the forest was more likely to burn and that there are not necessarily dangerous winds in the fall.

#### **The judgment of fire professional of hazards on Mount Sutro**

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 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.

UCSF’s own written plans for this project, “Mt. Sutro Open Space Reserve Management Plan” acknowledges the role that fog drip plays in keeping the forest floor moist: “Vegetation captures moisture through fog drip during much of the year. This fog drip may amount to 8 to 12 inches of annual precipitation.” (page 15). Obviously, destroying most of the forest will significantly reduce the fog drip which results from the condensation of the fog on the leaves of the tall trees. The drier the forest floor, the better the conditions for ignition.

The FEMA environmental officer who evaluated UCSF’s grant application also met with UCSF officials regarding their application. He informed them that their project was not likely to reduce fire hazards on Mount Sutro and in any case, fire hazards are minimal in San Francisco. If legal suit proves necessary to stop this project, this official will undoubtedly be asked to testify.

UCSF applied for a second fire hazard mitigation grant in 2010 from the California Fire Safe Council. The Fire Safe Council has awarded over 150 grants for Community-Based Wildfire Prevention, but it denied UCSF’s application. Surely this is another indication that those who are in a position to evaluate fire hazards do not believe that destroying the Sutro forest will reduce fire hazards.

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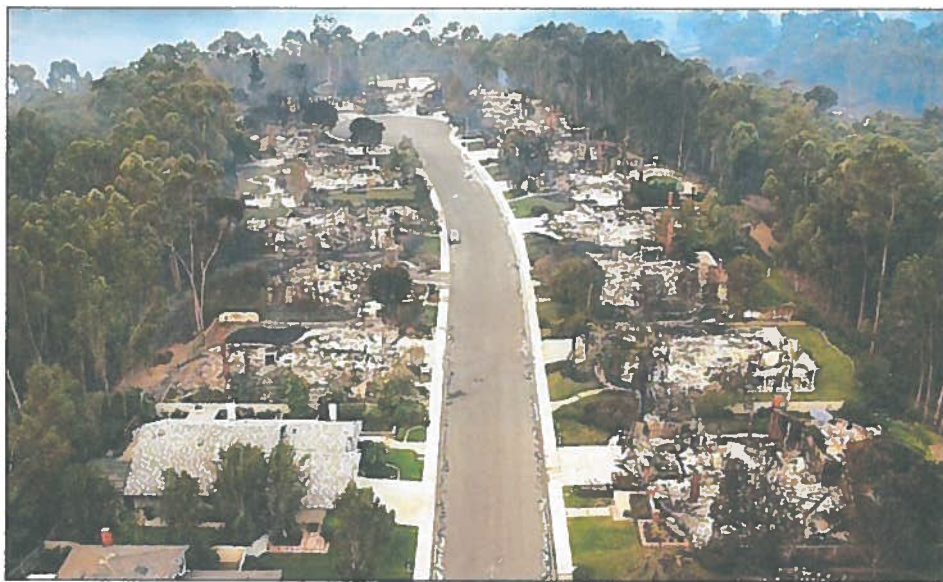
<sup>24</sup> Gilliam, Harold, The Weather of the San Francisco Bay Area, UC Press, 2002



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>25</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>26</sup> In other words, **despite the oil content in the leaf, its physical properties protect the leaf from ignition.**

**These principles are best illustrated by a photograph of an actual fire in San Diego in 2003 in which all the homes burned to the ground, but the eucalyptus forest surrounding those homes did not ignite:**



Source: New York Times

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>27</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>28</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

<sup>25</sup> <http://www.firescape.us/coastliveoaks.pdf>

<sup>26</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>27</sup> <http://www.ansci.cornell.edu/plants/medicinal/eucalyp.html>

<sup>28</sup> <http://www.paleotechnics.com/Articles/Bayarticle.html>

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.

### The role of wind in California wildfires

Fire is an essential feature of the landscape that is native to California.<sup>29</sup> Destroying a non-native forest in order to create a native landscape of grassland and scrub will not make us safer. 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>30</sup>

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>31</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>32</sup> **Thinning the forest will not reduce fire hazard. In fact, it will increase fire hazard.**

Jon E. Keeley of the USGS is a world-renowned expert on the fire ecology of California. I have read his recently published book (*Fire in Mediterranean Ecosystems: Ecology, Evolution and Management*, Cambridge University Press, 2011) and

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<sup>29</sup> Sugihara, Neil, *Fire in California's Ecosystems*, UC Press, 2006

<sup>30</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.

<sup>31</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>32</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

many of his articles. Anyone with a sincere interest in wildfire hazards in California would be wise to read these publications. Reference to Keeley's work is conspicuously absent from the DEIR.

Keeley's most recently published study<sup>33</sup> of specific wildfires in the Wildland-Urban-Interface (WUI) of California is most relevant to consideration of wildfire hazard in the Sutro Reserve. The authors studied the property damage resulting from specific wildfires in California "...and identified the main contributors to property loss." Here are some of their findings:

- "The arrangement and location of structures strongly affected their susceptibility to being destroyed in a wildfire and that empirically based maps developed using housing density and location can better identify hazardous locations than fuel-based maps."
- "The most worrisome finding was that the majority of property loss occurred in areas not designated as at-risk [by statewide fire hazard maps]."
- **"...property loss was most likely in areas of historical high fire frequency, which corresponded with wind corridors."**
- "Structures located near the edges of developments, or in housing clusters on steep slopes, were also more susceptible."
- **"...property loss was more or as likely to occur within herbaceous fuel types than within the higher fuel-volume woody types that are typically considered as the most hazardous fuels."**

For emphasis, let us reiterate that the study of wildfires in California suggests that the proposed project will not reduce fire hazard in the Sutro Reserve. Rather, it is more likely to increase fire hazard by eliminating most of the wind break provided by the forest so that the surrounding community—which is on steep slopes—is subjected to more wind and by replacing woody fuels with herbaceous fuels.

Herbaceous fuels are more likely to ignite and once ignited, fire moves more rapidly through the fuel. Here is what Jon Keeley testified to the US Senate in 2007, regarding wildfires in California: "It is estimated that no more than 3% of the recent 2007 fires...occurred in forests...the remaining 97 percent occurred in lower elevation shrublands and urban areas, burning native shrublands such as chaparral and sage scrub, non-native grasslands, and urban fuels."

### **Dead trees are more flammable**

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, there is no evidence that the mature trees that will be destroyed in the proposed project are dead or dying. The evaluation of the trees in the Reserve in 1999 states that, "In general, trees that make up the canopy were in good condition."<sup>34</sup> (Executive Summary) Furthermore, the project proposes to leave the remains of the trees that are destroyed on the forest floor, thereby increasing the fuel load of dead wood rather than decreasing it.

The DEIR claims that the Sutro forest is infected with snout beetle. According to the Chief Forester of the San Francisco Presidio, snout beetle has not been found in San Francisco.<sup>35</sup> Where it has been found in Southern California, it is said to

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<sup>33</sup> Alexandra Syphard, Jon W. Keeley, et. al., "Housing Arrangement and Location Determine the Likelihood of Housing Loss Due to Wildfire." PLOS ONE, March 18, 2012

<sup>34</sup> "Mount Sutro Open Space Reserve Maintenance and Restoration Plan," Hort Science, et, al., 1999

<sup>35</sup> <http://library.presidio.gov/archive/documents/vmp/vegetationmanagementplan.pdf>

be associated with very dry conditions that do not exist in San Francisco. In any case, where the snout beetle has been found in Southern California, it has been quickly eradicated by a biological control.<sup>36</sup>

Furthermore, if the predictions of experts on Sudden Oak Death prove to be true, 90% of the native oak woodland which UCSF proposes to plant will be dead and highly flammable within 25 years.<sup>37</sup> Yet, the DEIR says nothing about Sudden Oak Death which actually exists in San Francisco, but speculates about the theoretical existence of predators of eucalyptus that don't exist in San Francisco. This is yet another demonstration of the bias of the DEIR to justify a conversion of a non-native forest to a native landscape that is highly flammable even when it's alive.

In contrast to snout beetle, there is no known cure for oak trees infected with Sudden Oak Death.

#### **4.8 Hazards – Herbicide Use**

Please consider adding the following to the list of "Herbicide Use Restrictions:"

"Fruiting shrubs such as Himalayan blackberries will not be sprayed with herbicides while they are fruiting to minimize the risk that they will be eaten by people—especially children—and animals.

The DEIR acknowledges this risk, but does not propose this mitigation: "A secondary concern is the possibility of wildlife consuming contaminated food, including vegetation, fruit or insects." (DEIR 4.8-22) Posting signs about pesticide applications do not reduce the risk to wildlife. They can't read the signs!

#### **4.10 Noise**

The DEIR acknowledges that the "Proposed project thinning and understory removal activities in the Edgewood area could expose nearby residents to a substantial increase in noise levels." (DEIR 4.10-9) The DEIR judges this environmental impact to be "significant" and "unavoidable."

This environmental impact on the Edgewood neighborhood is entirely avoidable. The narrow finger of forest which borders the western edge of the Edgewood neighborhood should be removed from the proposed project area. That narrow band of forest provides both a wind break and a sound barrier for that neighborhood. There is no justification for subjecting that neighborhood to increased wind which prevails from the west, or to greater noise from the active portions of the campus due west of that neighborhood. As we have already said, thinning the forest will not reduce fire hazards; that it is a bogus justification for this needless environmental impact.

Furthermore the proposed mitigation for this impact is also bogus: "The University shall consider any requests by residents adjacent in these areas to plant trees and/or vegetation that may be less flammable than eucalyptus, to provide some degree of noise buffering." (DEIR 4.10-10). As we have said, eucalypts are not particularly flammable and many trees are even more flammable, such as native bays.

The only justification for removing trees from the area bordering the Edgewood neighborhood is if they are hazardous and in locations that imperil people or property. If hazardous trees must be removed, they should be replaced with trees that are adapted to the environmental conditions and will have sufficient stature to function as a wind and sound barrier for the neighborhood.

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<sup>36</sup> UC Davis IPM Program: [http://ucanr.edu/sites/UCNFA/Past\\_Programs\\_2011/?impact=48&a=40803](http://ucanr.edu/sites/UCNFA/Past_Programs_2011/?impact=48&a=40803)

<sup>37</sup> Fimrite, Peter, "Sudden oak death cases jump, spread in the Bay Areas," San Francisco Chronicle, October 2, 2011

The nativity of the tree is not relevant to this consideration. Rather, the function and horticultural requirements of the tree should be the only criteria. If existing trees are removed and replaced by other species, those who choose the species must be knowledgeable about the horticultural requirements of trees. Trees that are native to San Francisco will not grow in that location because they do not tolerate the wind. Trees grew in pre-settlement San Francisco only in sheltered areas. Redwoods are not native to San Francisco, but have been planted in sheltered locations on Mount Sutro (to which I have no objection), but they also do not tolerate wind.

#### 4.11 Wind

The wind conditions on Mount Sutro and the consequences of those conditions for the proposed project are complex. I freely admit that I do not have the technical expertise needed to analyze this issue. However, I am very familiar with the windy conditions on Mount Sutro because I worked on the Parnassus campus for 10 years and I remember it well as a place that was miserably cold and windy much of the time. Since it is a high hill with direct exposure to the prevailing winds from the west, this is to be expected. As the DEIR acknowledges, wind accelerates on steep slopes, such as Mount Parnassus.

Although I have read about the relationship between wind and trees, I do not have the technical tools to apply that information to the specific conditions on Mount Sutro. I know that it is a complex topography with many canyons and so the wind conditions are highly variable. It is not at all surprising that 4 wind stations on Mount Sutro reached different conclusions with respect to the velocity of wind in dense forest compared to sparse forest. It would take far more wind stations to capture an accurate picture of the interactions between the abiotic conditions and the existing forest, let alone predict the change in those conditions which would result from destroying most of the forest.

Therefore, I must confine myself to commenting only on the issues of which I have sufficient knowledge.

#### The physiological responses of the trees to wind

As I said in my comments about the Greenhouse Gas chapter, the DEIR would like the public to believe that the thinned forest will be capable of growing sufficiently to compensate for the loss of the existing capability to sequester carbon and recoup the loss of much of the existing stored carbon because the remaining trees will be released from competition. One of the reasons why this is wishful thinking is that the trees that remain will be subjected to a great deal more wind and that wind is going to reduce the trees' ability to grow:

*"As the magnitude of the stress (windspeed) increases, so do the resulting strains, resulting in a cascade of physiological strain responses. The physiological responses range from rapid changes in transpiration and photosynthesis at the foliar level, to reduced translocation, callose formation and ethylene production in the phloem and cambial zone. Long-term developmental and structural changes occur in canopy architecture and biomechanical properties of the xylem. "*<sup>38</sup>

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<sup>38</sup> F. W. Telewski, "Wind induced physiological and development responses in trees," in *Wind and Trees*, edited by MP Coutts and J Grace, Cambridge University Press, 1995

This same article explains that the canopy of a tree that is subjected to a great deal of wind tends to be narrower than one subjected to less wind and its leaves are smaller, which is one of the reasons why photosynthesis and transpiration are suppressed in a windy environment.

We turn to Joe McBride's wind study of the Presidio<sup>39</sup> for a specific, local example that illustrates these general principles. This is what Professor McBride observed at the Presidio:

*"Wind at the Presidio affects tree growth, form, and mortality. Exposure to winds in excess of 5 mph usually results in the closure of the stomata to prevent the desiccation of the foliage (Kozlowski and Palhardy, 1997) Photosynthesis is thereby stopped during periods of moderate to high wind exposure resulting in a reduction in tree growth...Eucalyptus showed the greatest reduction in growth with trees at the windward edge being only 46 percent as tall as trees on the leeward side."* (page 6)

The plans to destroy 90% of the trees on 46 acres of Mount Sutro will subject the few trees that remain to a great deal more wind. The growth of the few trees that remain will be significantly retarded by the wind. The claim of the DEIR that those trees will grow significantly larger when released from competition from their neighbors is fallacious because it does not take into account that the trees will be subjected to significantly more wind.

### Predicting windthrow

UCSF's own written plans for this project acknowledge that thinning the forest will increase the likelihood of the remaining trees failing: "Individual trees that suddenly become more exposed to high winds are also more likely to fall. For this reason, any thinning of the forest that is considered must not be so extensive that it will subject remaining trees to increased windfall." (page 15) Ignoring its own advice, UCSF proposes to destroy over 90% of the trees on 46 acres of the reserve.

The DEIR also acknowledges that the trees remaining after the forest is thinned will be vulnerable to windthrow for some unknown period of time during which they adjust to the changed environment. The DEIR suggests that it is possible to mitigate for this potential for windthrow by monitoring the remaining trees to identify potential hazards. In other words, the DEIR claims that it is possible to accurately identify trees that might fall before they fall.

This is a fiction. If it were indeed possible to accurately predict that a tree will fall, we wouldn't read reports of thousands of trees falling all over the country every year. Any reputable arborist will tell you that evaluation of trees for potential hazards is an art, not a science. That is, it is a subjective judgment and this is reflected in the wide numerical range used to rate trees for potential hazards. When an arborist agrees to a contract to conduct such an evaluation, he/she usually does so with a liability caveat, making it clear that he/she cannot accept legal responsibility for trees that fail which haven't been identified as hazardous by their evaluation.

For these reasons, the mitigation offered by the DEIR looks like a trap. If the evaluation is applied conservatively, the ultimate destruction of the entire forest seems likely. In other words, the few trees that remain will be declared hazardous and destroyed. Since those who demand this project have made it perfectly clear that they want the entire forest destroyed, that seems the likely scenario. If, on the other hand, the evaluation is not applied conservatively,

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<sup>39</sup> "Presidio of San Francisco, Wind Study, First Phase," Joe R. McBride, circa 2002

unpredicted tree failures are likely. In either case, the ultimate outcome is a forest with fewer trees than projected by the DEIR.

In a personal communicate with Professor Joseph McBride of UC Berkeley, I was provided with two specific examples to illustrate this trap. Professor McBride evaluated two extreme windthrow events in the San Francisco Presidio and Sea Ranch. This study is cited by the DEIR. Professor McBride told me that of the 6,000 trees that failed in the Presidio in an extreme weather event in 1993, most would not have been identified in advance as being vulnerable to windthrow. Healthy, structurally sound trees fail in extreme weather events. Conversely Professor McBride told me of an evaluation of all trees on the Berkeley campus in 1976 that judged about 3% of the trees as hazardous for which removal was recommended. Shortly after the evaluation was conducted, UC went through a period of budgetary constraints (much like the one UC is having presently) which prevented the removal of the trees judged to be hazardous. Over 35 years later, about 80% of those trees are still standing. In other words, **trees judged healthy sometimes fail and trees judged hazardous often do not fail.**

### **How to thin the forest without causing windthrow**

I am not a supporter of destroying the Sutro forest. Frankly, it seems an irresponsible waste of the University's limited resources at a time when the University is under extreme budgetary pressure. Students have been the primary victims of the budgetary cut-backs. They are being impoverished by tuition increases and their futures will be crippled by debt. And, of course, the forest is beautiful and it performs many valuable ecological functions. It makes hundreds if not thousands of people happy every day they walk in the forest.

However, if the University proceeds with this irresponsible plan, there is a way to do it without destroying the entire forest. Professor Joe McBride of UC Berkeley is cited by the DEIR for a study he did of windthrow events in San Francisco and Sea Ranch. He is an expert on the subject. He conducted a wind study for the Presidio about 10 years ago. The purpose of the study was to describe a specific sequence of tree removals that would minimize catastrophic windthrow. The plan proposed to remove 4,156 trees in a specific sequence over a period of thirty years.

The sequence of tree removals prescribed by Professor McBride was based on a detailed analysis of the topography and soils of the Presidio as well as the wind hardness of the tree species being removed (Monterey pine, Monterey cypress, eucalyptus). Here are a few of the characteristics of the topography that had to be taken into consideration:

- "...canyons opening at the ocean that would funnel the wind to higher elevations..."
- "...ridge lines" and "ridge gaps"
- "topographic breaks in slope (locations where slope angle changed abruptly)"

When all of the relevant variables were measured and analyzed, the prescriptions for 8 different sectors of the Presidio forest were as varied as the abiotic conditions. At one extreme, Sector #3 was to be thinned in three stages over a period of 30 years. At the other extreme, 51 eucalypts in Sector #4 could be removed in one cutting. During this thirty-year period, several new wind breaks of Monterey cypress were to be planted to replace much of the windbreak being destroyed and to protect the trees that would remain as well as the Presidio as a whole.

I don't see anything in the DEIR that suggests that the sequencing of the tree removals beyond the demonstration projects has been considered. The DEIR mentions that a maximum of 25% of the forest would be thinned at one time, but it does not describe a sequence for the removals. The windbreak of Monterey cypress that was originally planned



by UCSF has been canceled by the DEIR. **If UCSF insists upon destroying most of the forest, the least it can do is to try to prevent the unintentional destruction of the entire forest. Or is it intentional? One wonders.**

### More evidence of nativist bias

The DEIR makes this claim: *“The proposed management actions may lead to a conversion (e.g., through planting) that adds species that are more robust (e.g., coast live oak...bay laurel...) or less robust (e.g., Monterey cypress and Monterey pine) to windthrow.”* (DEIR 4.11-7 & 4.11-16)

First, let’s focus on the word, “may” in that sentence. In fact, the description of the project says next to nothing about “conversion planting” outside of the small demonstration areas. There is a single mention of planting oaks in a small area “if money is available.” Therefore, it is pointless to speculate about a “conversion planting” that is not specifically planned.

Secondly, coast live oak does not tolerate windy conditions. Oaks grew in pre-settlement San Francisco only in places where they were sheltered from the wind, such as the few watershed canyons in San Francisco. The only reason why the oaks planted on the summit of Mount Sutro survive is because they are sheltered from the wind by the trees that now surround them. When those trees are removed, the oaks are unlikely to survive in the long run. Here is a photo of a coast live oak that is hanging on for dear life on Tank Hill, a neighboring hill to Mount Sutro. It was planted along with 25 others over 10 years ago when the eucalypts were destroyed and the neighbors protested their destruction. This oak is one of only 5 that still survive. It doesn’t look as though it is going to last much longer.



Thirdly, there is no evidence that coast live oak and bay laurel—which are native trees—are any less subject to windthrow than Monterey cypress and Monterey pine, which are not native to San Francisco. The single reference provided by the DEIR which compares species of trees with respect to their wind hardness makes no mention of either coast live oak or bay laurel. (McBride and Leffingwell 2006)

Fourthly, the evidence that is available to us regarding the susceptibility of coast live oak and bay laurel to windthrow does not support the DEIR’s claim that they are “robust” to windthrow:



- The University of California's "California Tree Failure Report Program" reports that oaks (*Quercus*) were the most frequently reported genus to have failed in 2012: 22.7% of 5,415 reported tree failures were oaks.<sup>40</sup>
- Eucalyptus failure rates were nearly half of the failure rate of oaks: 11.9% of 5,415 reported tree failures were eucalyptus.
- The US Forest Service tree database provides this report on the roots of bay laurel: "Root systems of seedlings and young trees dug near Berkeley, CA, had relatively shallow root systems, as did some fallen older trees (28). Over half the roots in representative California-laurel stands in the Berkeley Hills were distributed in the top 30 cm."<sup>41</sup>

The DEIR's assumption that native trees are superior to non-native trees with respect to their wind hardness is merely a demonstration of nativist bias. Unless the final EIR can provide scientific evidence to support such a claim, that assumption should be deleted from the EIR.

The bay laurel is another native tree that is subject to Sudden Oak Death. Although it is not killed by SOD, it is considered the main vector of the disease to oaks which are killed by SOD. Where bays are infected with SOD in proximity of oaks, land owners are advised by UC's SOD expert to destroy the bays to prevent infection of the oaks.<sup>42</sup> As we said earlier, the fact that the DEIR makes no mention of SOD, is another indication that any problems associated with native plants and trees are being studiously ignored by a document which repeatedly demonstrates its nativist bias.

### In Conclusion

The proposed project will significantly damage the environment by:

- Increasing air pollution
- Destroying the habitat of the animals that live in the forest
- Increasing erosion by destroying the roots of the trees that stabilize the soil
- Increasing greenhouse gas emissions
- Increasing fire hazards by reducing moisture and increasing wind in the forest
- Subjecting the campus and the neighborhood to more wind
- Subjecting the neighborhood to more noise from the campus
- Increasing the dangers of windthrow by eliminating the windbreak for the forest

The project will also violate California law regarding reduction in greenhouse gas emissions by releasing tons of stored carbon into the atmosphere and reducing the ability of the forest to sequester forest in the future. The proposed mitigation for the release of stored carbon will not meet the legal time table for reducing greenhouse gas emissions. The proposed mitigation for this impact is also based on fallacious assumptions that are unsupported by scientific evidence.

**Therefore, the "No Project" alternative is the only option for UCSF to avoid a costly legal battle.**

Mary McAllister  
[marymcallister@comcast.net](mailto:marymcallister@comcast.net)  
 February 26, 2013

<sup>40</sup> [http://ucanr.edu/sites/treefail/CTFRP\\_Statistics/](http://ucanr.edu/sites/treefail/CTFRP_Statistics/)

<sup>41</sup> [http://www.na.fs.fed.us/spfo/pubs/silvics\\_manual/volume\\_2/umbellularia/californica.htm](http://www.na.fs.fed.us/spfo/pubs/silvics_manual/volume_2/umbellularia/californica.htm)

<sup>40</sup> Fimrite, Peter, "Sudden oak death cases jump, spread in the Bay Areas," San Francisco Chronicle, October 2, 2011

HM PA: PDM07  
F ST DR: 29  
Project # 29  
OES #: 000-92294  
A G H  
M P S  
Doc Date: 10-1-09



FEMA

October 1, 2009

Mr. Frank McCartron  
Governor's Authorized Representative  
California Emergency Management Agency  
3650 Schriever Ave.  
Mather, CA 95655



Re: Response to Request for Information — PDM09-PJ14 Ref NO9-1568  
PDMC-PJ-09-CA-2009-001, Mt Sutro Edgewood Avenue  
PDMC-PJ-09-CA-2007-010, Mt Sutro South Ridge — PDM09-PJ29 Ref NO9-1569  
Vegetation Management (Wildfire Risk Reduction) Projects  
Subgrantee: University of California, San Francisco

Dear Mr. McCartron:

On July 21, 2009, the Department of Homeland Security's Federal Emergency Management Agency transmitted a Request for Information to the California Emergency Management Agency (Cal EMA) regarding the subject proposals. Your office forwarded this request to the University of California at San Francisco (UCSF), and UCSF provided a response letter, dated August 10, 2009, which was subsequently forwarded to, and received by, FEMA on September 3, 2009. FEMA has reviewed the letter prepared by UCSF and is providing a response and subsequent requests. This letter generally addresses the purpose and need for action, the effectiveness of the proposed projects, and appropriate alternatives to the proposed projects, which are required for FEMA's compliance with the National Environmental Policy Act (NEPA). Please note, however, that FEMA may later require additional information to complete its environmental and historic compliance process.

UCSF must clarify and provide supporting documentation for the statements and claims made in its August 10, 2009, response letter in order to strengthen its arguments for the need as well as the efficacy of the proposed projects. Specifically, UCSF will need to provide the following:

- An accurate, informed, and robust argument regarding the purpose and need for the projects,
- A complete profile of the wildfire hazard in the Sutro Forest,
- A clear analysis of how the built environment is vulnerable to a wildfire hazard in the Sutro Forest,
- A clear description of the anticipated effectiveness of the proposed projects in mitigating the wildfire hazard to the identified vulnerable built environment, and

- A clear description of potential alternative actions that could also mitigate the wildfire hazard to the identified vulnerable built environment.

UCSF needs to provide information in a clear and concise manner, including appropriate citations. UCSF needs to supply applicable and appropriate quantified data to support its claims. All analyses and claims made by UCSF need to be reproducible and verifiable by FEMA (or the general public) should FEMA determine it necessary to conduct its own independent analyses. Reports described by UCSF that were not a part of the original grant applications must be provided.

#### 1. Clarify the Wildfire Hazard

In its response to provide a clarification of the wildfire hazard, UCSF inaccurately interprets a map, provides inadequate details regarding the history of wildfires in the Sutro Forest, and provides a simplistic and ineffective comparison of the wildfire hazard in the Sutro Forest to the hazard in other areas that have burned in the San Francisco Bay area. UCSF states that "the San Francisco Department of Emergency Management has adopted a CDF Wildfire Hazard Map as part of its Hazard Mitigation Plan, which confirms that the proposed project sites are in fact very high wildfire hazard areas." This conclusion represents an inaccurate interpretation of the referenced map. Not only does the text of the Hazard Mitigation Plan that references this map state that the map illustrates only the extent and not the probability of a wildfire, the text on the actual map specifies that fuel ranks classify areas based not on hazard potential but on existing vegetation and anticipated fire behavior in that vegetation type. As explained by Dave Sapsis (CDF Fire and Resource Assessment Program (FRAP) Wildland Fire Scientist), "Fuel rank is only one of the two components used to get to future threat. The other is rotation rank which is an estimator for future burn probability." The map provided by UCSF illustrates expected wildfire behavior, but omits any estimate of fire likelihood, and because fuel ranks do not correlate directly to the full profile of a wildfire hazard, the map cannot be used to identify the hazard. A complete profile of the wildfire hazard in the Sutro Forest will require the input of information on the probability for an area to experience appropriate conditions to promote a wildfire (ignition and weather/climate). The FRAP "Draft Fire Hazard Severity Zones in LRA" (FHSZ) map for the County of San Francisco more aptly characterizes the actual wildfire hazard in the County and City of San Francisco. As described by Dave Sapsis:

FHSZ differs from fire threat in the way fire probabilities were used, the way fuel systems were modeled for potential not current conditions, and how fuel systems influence the areas around them. Fire threat is a measure of in situ hazard, and doesn't include the influence of adjacent areas (either via flame spread or firebrands). This makes sense since fire threat was designed to characterize wildland fuel hazards, and FHSZ was designed to include those areas (as potential) and adjacent urbanized WUI [Wildland Urban Interface] areas as well.

The 2007 FHSZ map shows the Sutro Forest to have a "Moderate" wildfire hazard. In the 2007 FHSZ map, "Moderate" is the lowest of the three fire hazard severity zones. The 2007 FHSZ maps can be viewed at this website,  
[http://www.fire.ca.gov/fire\\_prevention/fhsz\\_maps/fhsz\\_maps\\_sanfrancisco.php](http://www.fire.ca.gov/fire_prevention/fhsz_maps/fhsz_maps_sanfrancisco.php).

If UCSF disputes the "Moderate" fire hazard severity zone given by FRAP for the Sutro Forest, UCSF may provide its own site-specific analysis of the wildfire hazard for the Sutro Forest. Specifically, UCSF will need to identify the ignition source, measure the fuel load, and analyze the capacity for the fuel to ignite across the Sutro Forest given existing fuel moisture and weather conditions. Additionally, if UCSF prefers to match the modeling integrity of the FRAP mapping effort, it must model potential fuels over a 30 to 50 year time horizon.

UCSF briefly described previous fires that occurred in the Sutro Forest. An examination of past hazard events is an important step in profiling and characterizing a potential hazard condition, and therefore UCSF must provide adequate detail about these previous events for this historic information to be relevant to current conditions. The source material of previously documented fires must be provided, and ideally, this would include details about where the fires occurred, the fire ignition sources, the time of year of each fire, and a list of structures that were damaged. Additionally, UCSF must provide an estimate of the successional stage of the Sutro Forest during each fire event and an analysis of the relevance of these previous fires to current forest conditions.

UCSF also mentioned reports of a fire that occurred approximately 20 years ago and two additional fires that occurred in the past decade. These fire events must be described in more detail to demonstrate that the nature of the fires (ignition source, cause, extent, season of fire) is relevant to the current condition of the Sutro Forest.

In its response letter, UCSF relates its wildfire hazard to previous wildfires that occurred in the San Francisco Bay area, specifically one that occurred "in Marin County along the coast" and a fire that occurred on Angel Island in 2008. For the wildfire hazard conditions at Sutro Forest to be compared to these two fires, UCSF must demonstrate the similarities between Angel Island, the referenced "Marin County" fire, and the Sutro Forest in terms of the hazard, i.e. ignition threats, weather conditions, forest type, etc.

## 2. Clarify the Risk to the Built Environment

FEMA understands that the built environment adjacent to the Sutro Forest is extensive and dense and includes several medical facilities, residential housing, transit infrastructure, and a large teaching college and research facility. However, UCSF must provide a more clear description and complete analysis of the vulnerability of the built environment to a wildfire in the Sutro Forest.

To improve its vulnerability analysis, UCSF must inventory the built environment, describe the methodology of its vulnerability analysis, describe data limitations, provide an exposure analysis to the hazard, summarize the impacts of the hazard, and describe likely land use and development trends that may affect the vulnerable built environment in the future. The analysis must address the vulnerable general building stock, critical and non-critical facilities, major utilities, and transportation infrastructure. This analysis must include vulnerability to a wildfire anywhere in the Sutro Forest, not just at the proposed project sites. It would be useful to describe the built environment in three geographic locations throughout the analysis: 1.) within the Sutro Forest, 2.) immediately adjacent to the forest, and 3.) in the vicinity of the forest.

UCSF's response letter describes replacement cost of structures, which implies worst-case scenario physical damage. Considering some structures may be more resistant to fire than others, it is likely that some structures affected by a wildfire in the Sutro Forest would not require complete replacement. UCSF must provide a more moderate and reasonable estimate of loss to building stock that considers the fire resistance of structures.

The vulnerability analysis would be more realistic if it addressed firefighting capabilities to battle a wildfire in the Sutro Forest. Firefighting capabilities may also affect the vulnerability of the built environment (for instance, structures within Sutro Forest) to a wildfire in the Sutro Forest.

### 3. Clarify How the Proposed Mitigation will Reduce the Wildfire Risk

Assuming that UCSF has been able to establish a clear need for the proposed projects, the efficacy of the mitigation strategy it proposes must be clarified. UCSF must provide a clear and concise analysis and description of how the proposed projects would reduce the wildfire hazard in the Sutro Forest to the identified vulnerable built environment. This analysis must account for the fact that large parts of the Sutro Forest would be unchanged after the implementation of the proposed projects.

In the July 21, 2009, letter, FEMA requested that UCSF describe the specific hazard conditions after completion of the proposed work and the resultant hazard over the life of the proposed projects. FEMA has not been provided information from UCSF that clearly addresses this request. To repeat FEMA's initial request, UCSF must provide information of the probable change in wildfire hazard throughout Sutro Forest after the proposed projects have been implemented and the probable change in wildfire hazard throughout Sutro Forest throughout the useful life of the proposed projects. This analysis must be based on accepted scientific methodology and must be presented to FEMA in a manner that can be verified by FEMA (or the interested public). This analysis must incorporate the 5-year maintenance schedule described by UCSF in its grant applications and must also provide details with regard to the specific built environment that will benefit from the proposed projects.

In its August 10, 2009, response letter, UCSF alludes to the notion that the proposed projects would improve wildfire firefighting capabilities within the proposed project areas. To improve the credibility of this argument, UCSF must incorporate the existing firefighting capabilities to fight a wildfire in the Sutro Forest and to then provide a direct comparison of how the proposed projects will result in improvements in these capabilities. Providing copies of letters from fire departments to this effect may be useful in strengthening this particular argument.

The August 10, 2009, response letter, states that "the Edgewood Avenue Area Project will be informed by the lessons learned in the South Ridge Area Project". If this is to be the case, UCSF must clarify if it may request a change in the Scope of Work contained in its Edgewood Avenue grant application as a result of the "lessons learned" from implementing the proposed South Ridge project.

FEMA has received a number of unsolicited public comments concerning the effects of tree removal on fuel moisture levels in the Sutro Forest. Commenters argue that the proposed projects would increase wildfire hazard by removing some of the material that collects fog drip and keeps the forest moist and resistant to ignition and fire, thus allowing the forest to dry out more easily and increase the relative hazard for ignition. Can UCSF specifically address this comment and describe how overall forest moisture content will change after implementation of the proposed projects? Please provide scientific evidence to support any claims.

Additionally, several of these unsolicited public comments have stated that the proposed projects could result in changed wind patterns on Mount Sutro which could also increase the wildfire hazard in the forest. New wind patterns could reduce biomass moisture as well as reduce the effective windbreak created by the current forest. These commenters argue that the effective windbreak created by the existing forest limits the potential for wildfire spread in the forest and the immediately surrounding area. As UCSF has stated, winds are a contributing factor in wildfires. Provide a citable and logical defense regarding how the proposed projects, and the resulting changes in wind patterns, would not result in an increase in the wildfire hazard in the Sutro Forest.

#### 4. Describe Alternatives to the Proposed Work

UCSF has failed to identify alternatives to the proposed projects that meet the purpose and need of wildfire mitigation. Assuming that UCSF has been able to establish a clear need for wildfire mitigation activities, UCSF must conduct a more thorough analysis to identify alternatives to the proposed projects that could mitigate wildfire hazard in the Sutro Forest to the vulnerable built environment. These alternatives must be technically, economically, and legally practical and feasible and can include activities not eligible for FEMA grant funding. As described in FEMA's Wildfire Mitigation Policy, MRR-2-08-1, FEMA wildfire mitigation grants are available for defensible space, structural retrofit, and vegetation reduction projects. It would seem reasonable that alternatives to the proposed projects could include defensible space or retrofit projects. UCSF has not indicated that these types of alternate projects have been analyzed. Please note that FEMA funding is available for ignition-resistant construction projects only after defensible space activities are complete.

FEMA requests a response within 31 days of the date of this letter, or by November 1, 2009, including a schedule of when the requested information will be provided. Should you have any questions or need further assistance please do not hesitate to contact me at (510) 627-7027 or [fema-rix-ehp-documents@dhs.gov](mailto:fema-rix-ehp-documents@dhs.gov).

Sincerely,



Alessandro Amaglio  
Environmental Officer

From: [Frank H Vial](#)  
To: [Campus Planning - EIR](#)  
Subject: Public Comment on Mount Sutro UCSF Project  
Date: Tuesday, February 26, 2013 9:57:20 AM

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Dear Mrs. Wong,  
I'd like to voice my concern about the UCSF Mount Sutro Reforestation Project. Apart from the potentially devastating and hard to predict environmental consequences, I find it unconscionable that a public entity is spending money on such a project during times of hardship.

thanks

frank h vial  
4520 17th street #2  
San Francisco, CA 94114  
+1.415.866.8530  
[frank@flux21.net](mailto:frank@flux21.net)

COMMENT FORM

Date: 26 FEB 2013

Diane Wong  
UCSF Campus Planning  
654 Minnesota Street  
San Francisco, CA 94143-0286

Dear Ms. Wong:

I wish to make the following comment(s) regarding the Draft Environmental Impact Report (EIR) on the UCSF Mount Sutro Management project:

WHAT IS THE UNIVERSITY'S  
UNDERSTANDING OF THE EFFECT OF  
THE TREES ON MT. SUTRO ON LAND  
SUBSIDENCE, DOWNWARD LAND MOVEMENT,  
LANDSLIDES, AND THE LIKE?  
WHAT ADVICE HAS THE UNIVERSITY  
RECEIVED ON SUBSIDENCE OF MT. SUTRO?

Sincerely,

Robert S. Wilson

ROBERT S. WILSON  
740 PARNASSUS AVE.  
APT 4  
SAN FRANCISCO, CA 94172



COMMENT FORM

Date: 25 Feb 13

Diane Wong  
UCSF Campus Planning  
654 Minnesota Street  
San Francisco, CA 94143-0286

Dear Ms. Wong:

I wish to make the following comment(s) regarding the Draft Environmental Impact Report (EIR) on the UCSF Mount Sutro Management project:

- 1) I support the EIR. As Tree Removal as a member of the Olympic club forest management is crucial - which the golf course about 100 years old requires
- 2) Biking, Hiking Trails are great. In L.A. the Irvine open space preserves both are compatible.
  - a) the new trails prepared are very appropriate
  - b) Trail Exits on Crestmont + ~~near~~ Christopher st need work!! Very dangerous in wet conditions

Sincerely, Jerry Wright

JGWRIGHTSF@Yahoo.com  
152 Locksley, 94122

From: [Bagot-Lopez, Barbara](#)  
To: [Campus Planning - EIR](#)  
Subject: Fwd: UCSF Mount Sutro Open Space Reserve EIR  
Date: Wednesday, February 27, 2013 3:30:13 PM

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BB

Please excuse iPhone typos...

Begin forwarded message:

**From:** Tom Borden <[tom@intrinsicdevices.com](mailto:tom@intrinsicdevices.com)>  
**Date:** February 27, 2013, 3:08:51 PM PST  
**To:** "Bagot-Lopez, Barbara" <[BBlopez@CGR.ucsf.edu](mailto:BBlopez@CGR.ucsf.edu)>  
**Subject:** UCSF Mount Sutro Open Space Reserve EIR

Barbara,

I am sending this message in regard to the EIR for the UCSF Mount Sutro Open Space Reserve.

I sit on the board of SF Urban Riders and have spent many days working with the Sutro Stewards as a crew leader for trail building and on maintenance of the Rotary Garden.

I support UCSF's plan for Mount Sutro. I feel there has been adequate public outreach and opportunity for public input. I do not think judicious tree thinning will have a negative impact on the Open Space or the surrounding neighborhoods.

Regards,

Tom Borden

Tom Borden  
Intrinsic Devices, Inc.  
tel: 415-252-5902  
fax: 415-252-1624

U.C.S.F. Proposed Project  
(DEIR)

i totally support your plans  
to remove non-native trees &  
plants & re-place them with  
more native trees. this is a great  
idea. (hope it goes through)...

Good Luck! about time.  
concerned Neighbor;

J. Devigili  
206 Kirkham St.  
S.F. 94122

P.S. can you please send me the  
full plan of the project & when  
it's going to take place can't  
wait. I don't own a computer

RECEIVED  
UCSF

FEB 27 2013

CAMPUS PLANNING  
OFFICE

From: [Dennis Hong](#)  
To: [Campus Planning - EIR](#)  
Subject: Re: UCSF DEIR - Mount Sutro  
Date: Wednesday, February 27, 2013 3:08:43 PM

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Good afternoon Miss Wong,

On January 24th, 2013 I received your Draft EIR for UCSF's Mount Sutro Management Plan of Jan 18, 2013. Case Number 2010122041 As usual, it was professionally done. I did these EIR's back in the late sixties and early seventies (mostly the old Manual way- white out, cut and paste) and can appreciate the work that goes in to these documents. I also appreciate UCSF reaching out and working with the community with your projects.

I'm also reviewing a San Francisco DEIR case 2004.0093E; San Francisco Overlook Development Residential Project. It to is an exciting residential project and is adjacent to this (UCSF's) Project. It includes a new road and a substantial amount of new development at Crestmount Ave and OakHurst Lane. It looks like real enhancement to the UCSF's property. Unfortunately, I have been having a little trouble reconciling the streets and the new roads up on the hill. Then I may have some old maps that do not show some of the recent developments up there.

Miss. Wong, I trust this meets UCSF's deadline of March 4th, 2013 to make any Comments to this Project. Unfortunately I was not able to attend your February 25th meeting. However, in closing, I totally support UCSF's development of this Plan. Please keep me on the distribution list for this Project. I look forward to the Final EIR with the Comments and Responses.

Best Regards,

Dennis Hong

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**From:** Dennis Hong <dennisj.gov88@yahoo.com>  
**To:** "EIR@planning.ucsf.edu" <EIR@planning.ucsf.edu>  
**Sent:** Friday, January 18, 2013 3:33 PM  
**Subject:** UCSF DEIR - Mount Sutro

Dennis J. Hong  
101 Marietta Drive  
San Francisco, CA. 94127-1841  
415-239-5867  
January 18, 2013

University of California San Francisco  
Atten: Miss. Diane Wong, Environmental Coordinator  
Campus Planning, Box 0286

San Francisco, CA. 94143-0286

[EIR@planning.ucsf.edu](mailto:EIR@planning.ucsf.edu)

Subject: DEIR - UCSF Mount Sutro Management Project

– Parnassus Height campus

Good afternoon Miss. Diane Wong,

I'm in receipt of a notice from the San Francisco Planning Commission that this DEIR is available and ready for review and comments. We would like to receive a hard copy of this DEIR. This document can be sent to me at the above address.

Should you have any question on this issue, please feel free to email me at [dennisj.gov88@yahoo.com](mailto:dennisj.gov88@yahoo.com) or call me at 415.239.5867. By chance, has there been a case number assigned to this DEIR? If there is can you forward the case number to me?

With that said, I look forward to reviewing and concurring with both the DEIR and the Final EIR/comments and responses.

Thank you for allowing me this opportunity to comment on this Projects DEIR.

My Email is: [dennisj.gov88@yahoo.com](mailto:dennisj.gov88@yahoo.com)

Regards,

Dennis Hong

Cc: per email

**From:** [stuart phillips](#)  
**To:** [Campus Planning - EIR](#); [regentsoffice@ucop.edu](mailto:regentsoffice@ucop.edu); [Chancellor](#)  
**Subject:** sutro forest leave alone please  
**Date:** Thursday, February 28, 2013 1:36:31 AM

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Please don't cut any trees in the beloved Sutro forest, just leave this forest alone please, it is fine how it is, decimating this forest would be a travesty, please leave it completely alone, for the public to enjoy, it is best left in its' wild state, thankyou. stu lips, oakland, ca

From: [Natalie Poltz](#)  
To: [Campus Planning - EIR](#)  
Subject: Some Comments/Questions after Feb. 25th hearing  
Date: Thursday, February 28, 2013 8:25:58 PM

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Dear Ms. Wong,

I attended the hearing on February 25, 2013 and found most of the comments and points raised helpful. I'd like to submit my following written comments/questions as well for consideration.

1. What are the native species of trees and undergrowth in San Francisco area at same latitude/longitude?

I'm asking this question because I know that people have changed the habitat of San Francisco considerably since our arrival. My understanding is that the Richmond district used to be a bay and Golden Gate park used to be sand dunes. In this regard, the habitat that has been established in Golden Gate park and Mount Sutro is lush and rich in wildlife now that I see as a success story.

2. What are the current animals living in Mount Sutro? What is their native habitat?

We now have wildlife that has adapted to living in the habitat as it is now. I volunteer with the Academy of Science (although this email contains my personal comments which are completely my own) and my understanding is that we are losing habitat, plant species, and animal life at an incredibly alarming rate. So any location that contains rich natural life is incredibly valuable.

3. Where else has the native plant and animal species been restored in SF? When was it established? how successful is it now?

I thought the point raised about other locations in which we have tried to restore the native plant and animal species having been unsuccessful was a good one. We need to consider what the climate is like now and whether it still provides the ideal conditions to create a thriving habitat.

4. How many trees are planning to be felled if not the 30,000?

I agree the spacing sounds too large but I thought the student from Seattle raised a good point about needing to do some thinning to create a healthy habitat. Especially since nature cannot completely restore itself through its normal processes due to the urban surroundings we do need to provide some maintenance. But please err on the side of caution. You can always take more trees as needed but it is not so easy to put them back.

5. I'm absolutely and utterly opposed to pesticides being used. Period and non-negotiable. The point about not meaning to do harm was right on. The best intentions can still go horribly wrong. I have to express this concern out right.

I appreciate your time in reviewing my comments. Good luck and thank for providing a platform to listen to the public.

Best regards,

Natalie Poltz  
310 Parnassus Avenue, Apt. 101  
San Francisco, CA 94117  
(415) 225-5039



From: [Paul Gorman](#)  
To: [Campus Planning - EIR](#)  
Subject: draft eir  
Date: Saturday, March 02, 2013 8:55:03 PM

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I would like to make this comment on the draft EIR for the UCSF Mount Sutro Management Project:

The urgency of this very tardy exercise in civic responsibility by UCSF cannot be overemphasized. Persons on the north end of Crestmont Drive, adjacent to the forest and literally under the canopy have been begging for decades that UCSF undertake its responsibility to manage this forest, and particularly to address the problem of the trees along the west perimeter. Because the forest has gone unmanaged for over a century the trees have grown densely competing for sunlight by reaching up over a hundred feet and then west to follow the afternoon sun. Laterals of fifty feet or more can be seen making the tree badly out of balance. The neighborhood is then cast in shade so dense almost no plants can survive in containers. The sun simply cannot get onto the street before early afternoon. Consequently the homes are plagued with leaves and other detritus in the gutters and on the rooftops and cluttering the street after every storm. Homes have to be power-washed and repeated frequently because of a the green mold-like substance exuded from the forest.

UCSF has been an atrocious neighbor in this regard and has turned a deaf ear to our many request to the Cancellor's office for relief. All we could get throughout Chancellor Bishop's administration was a weak acknowledgement and no action. A long line of PR folks, most recently Barbara Bagot-Lopez has simply tuned us out. The Third Street complex absorbed total attention and resources. Never before could this Sutro Forest issue even reach recognition in the budget.

This west slope is mainly Franciscan chert, as I understand it and does not provide deep footing for the roots. During winter storms large trees can be heard cracking and falling less that 75 feet away. Fortunately the direction of the wind topples them more parallel to the road but one could easily fall across the narrow road and damage the residences built to the edge of the road. The complete indifference of UCSF to our peril amazed and infuriated us especially the many members of "the UCSF Family" as Chancellor Krevans used to call us graduates, faculty and top administrators in the Graduate Division, Pharmacy, Nursing and Dentistry. For Medicine, look to Edgewood.

There is no setback from the east side of the road. Saplings grow untended just a few feet from the cars parked along the street and . English ivy climbs up the side of the hill choking the life out of the rare indigenous pine or cedar and harboring rats that run under the cars at night and cross the road into the gaps between the homes. The sick long-needle pines reach far out over the street to get sunlight and drop limbs on the street below every winter. Lately UCSF has been showing up to cut up the obstructions with some help from the City. So there is no question whether the University has been aware of the problems tehir indifference has caused.

This note is to support the current effort, not to castigate the decades of indifference and neglect. I only regret that Crestmont was not given a higher priority in the forest management schedule despite our repeated request for attention. The



Mount Sutro Woods Owners Association that includes much of the Crestmont Road once again offers to assist in any way to advance this awakening of responsibility by our distinguished neighbor. You can start by contacting me.

Finally I would like to commend Craig Dawson for his very dedicated and constructive one man efforts to convert this public nuisance (not UCSF-the overgrown forest) into the urban jewel it can be. David and Goliath.

William P. Dillon, M.D and Irene Balcar, M.D.  
240 Edgewood Avenue  
San Francisco, Ca. 94117

Ms. Diane Wong  
UCSF Environmental Coordinator  
UCSF Campus Planning  
Box 0286  
San Francisco, CA 94143-0268

Dear Ms. Wong:

My wife and I have lived at 240 Edgewood Avenue, where we raised our three children, since 1992. Prior to that we lived for 5 years on nearby Woodland Avenue. I am a Professor of Radiology and department Executive Vice-Chair at UCSF and my wife trained at UCSF as a resident in the early 1980s. Needless to say we love UCSF! Irene gave birth to our three children at UCSF, and we have enjoyed being UCSF neighbors, walking the beautiful forest paths with our dog, kids and neighbors. It is a unique environment for the city.

I recently attended the public hearing at Millberry on February 25, 2013. There I heard many impassioned neighbors speaking eloquently about how important this beautiful bit of nature had become to their lives. I also heard others speak of the need to steward the forest to keep it healthy for future generations to enjoy, and to keep us all safe from the potential of fire.

We write to alert you to what we believe is a public relations disaster for UCSF. It is bad enough to discuss the potential of clearing thousands of trees (this needs a clearer message of why, more precise number, and a clear message that UCSF plans to protect the forest), but the use of herbicides to control regrowth of the forest after clearing is counter to what UCSF stands for: the health and safety of people! We are against this on many levels. Many families enjoy walks with their young children through the forest. Neighbors frequent the trails with their pets. The use of pesticides should under no circumstances be part of the management plan of this special place. The current draft EIR makes UCSF look less like a neighbor and more like an unfeeling institution, without regard for the safety of those who enjoy the forest.

We also feel strongly that the process of tree thinning occur more gradually, so that neighbors are not subjected to constant noise pollution from the clearing process, and the increased wind that the draft EIR indicates will occur following tree thinning. We strongly urge more deliberate, paced maintenance with the aim of preserving this special place for generations to come.

Sincerely,

The block contains two handwritten signatures in black ink. The signature on the left is for William P. Dillon and is more stylized and compact. The signature on the right is for Irene Balcar and is more flowing and legible, with the first name clearly visible.

William P. Dillon , M.D,          Irene Balcar, M.D.

Cc Dr Susan Desmond-Hellman, Chancellor UCSF

From: [Mark Heath](#)  
To: [Campus Planning - EIR](#)  
Subject: support for UCSF forest management in the Mt Sutro Open Space  
Date: Sunday, March 03, 2013 2:13:24 PM

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Dr. Ms. Wong,

I support the University of California's plan to thin dangerous forest trees, remove invasive shrubs and vines and restore areas and trails in the Mt. Sutro Open Space. The forest is in dire need of proper forest management before there is a grave public safety problem. The overgrown forest is currently a public safety hazard in the winter when trees and limbs fall dangerously to the ground and in the summer when the forest becomes a massive wildlife hazard. The University must see through their plans to improve the forest health by removing diseased, damaged and overly dense trees on the property and restoring the open space with more appropriate, drought resistant native trees and shrubs.

Thanks,

Mark A. Heath  
2625 Ortega Street  
San Francisco, CA 94122  
(415) 665-9129 - home

From: [Greg Gaar](#)  
To: [Campus Planning - EIR](#)  
Subject: Mt Sutro Management Plan comments  
Date: Monday, March 04, 2013 8:50:18 PM

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To-Diane Wong  
Subject-Comments on Mt. Sutro Management Plan EIR

As a longtime advocate of habitat restoration, I'm happy to see that UCSF is proposing to manage the Mt. Sutro Open Space Preserve. Environmentalists have been waiting for many, many years for a plan to be implemented.

The Sutro Stewards under Craig Dawson have been voluntarily managing the open spaces of Mt. Sutro. The Stewards know Mt. Sutro intimately. Therefore, the Stewards are well aware of Mt. Sutro's environmental problems. The Sutro Stewards input along with scientific input from arborists and other professional land managers offer a reasonable template for sustainably managing the natural resources on Mt. Sutro.

My recommendations are similar to the recommendations of the Stewards and the Management Plan-  
**Thin the eucalyptus overstory for a healthier forest and healthier understory.**

**Control invasive exotic plants such as English ivy, Cape ivy, blackberry, erharta grass etc.**

**After removing the weeds, plant a native plant understory from seedlings propagated at the Sutro Nursery which will increase the biodiversity on Mt. Sutro.**

**Maintain an accessible trail system (though I worry about fast moving mountain bikes).**

**Questions on the EIR:**

What will be the environmental impacts on Mt. Sutro if the management plan is not implemented?

Will the management problems worsen exponentially?

Will the weeds spread faster?

Will the health of the forest decline faster?

Will the university's financial cost to deal with Mt. Sutro's deteriorating conditions increase faster?

There will be people who will oppose the removal of any tree or the planting of any native plants. There will be people who will oppose any management plan for Mt. Sutro.

I believe that it would be irresponsible for the university to **not** manage the Mt. Sutro Open Space Preserve.

For seven years, I operated a San Francisco native plant nursery at the Recycling Center in Golden Gate Park. When the site was shutdown by the City, I donated most of the seedlings to the Sutro Nursery, because I trust the Sutro Stewards to put the plants to good use on Mt. Sutro.

Thank You,  
Greg Gaar  
San Francisco

From: [Lew, Damon](#)  
To: [Campus Planning - EIR](#)  
Subject: FW: Mt Sutro Maintenance Plan  
Date: Tuesday, March 05, 2013 9:18:27 AM

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**From:** Jay Parkhill [mailto:jp@jparkhill.com]  
**Sent:** Monday, March 04, 2013 9:18 PM  
**To:** Lew, Damon  
**Subject:** Mt Sutro Maintenance Plan

Dear Damon,

I attended the public hearing last week and appreciated the opportunity to hear all the viewpoints.

I want to let you know that I live a block away from UCSF, I have read the EIR and I support UCSF's plan, BUT I have a few questions/requests I hope you can address in future communications.

#1 The EIR's "worst case scenario" sounds quite bad. What circumstances might cause that to happen?

#2 What is the expected range of activity? E.g. if UC does not intend to remove 30,000 trees how many does it expect would be removed in a "best case" and a "medium case" scenario?

#3 Same question for undergrowth. 90% removal is drastic. What is realistic?

#4 The 30 foot distance between trees sounds very aggressive. I hope UC will reconsider that and maintain a denser forest.

#5 Much of the opposition to the maintenance plan came out of an emotional attachment to the forest's dense, lush, quiet greenery. Although it is overgrown and needs work, people like the fact that it feels wild and a little out of control (contrast with the now heavily-manicured Presidio). I hope UC will take those important feelings into consideration.

#6 Most important, what is UC's vision for the forest? What should it look like in 5 years, 15 years and 30 years? I believe that showing a clear vision may help bring community support for the plan.

Thank you  
Jay Parkhill

UCSF Campus Planning  
Box 0628  
San Francisco, CA. 94143-0286

ALAN Z. SKOLNIKOFF, M. D.  
205 EDGEWOOD AVE.  
SAN FRANCISCO 94117  
PHONE: (415) 661-5176  
PSYCHIATRY & PSYCHOANALYSIS

March 4, 2013

Attn: Diane Wong

#### Maintenance of UCSF forest west of Edgewood

What follows are some thoughts about UCSF's intention to clear cut a large percentage of the trees (predominantly eucalyptus) in the forest west of Edgewood. I (owner and living at 205 Edgewood since 1965) along with other neighbors on the West side of Edgewood have over the years been negatively affected by UCSF's cutting down and thinning a large percentage of the original trees of the forest.

3 main factors have been negative:

1. The weather has become cooler and windier because of the thinning of the forest.
2. The noise from the University plant has doubled as the forest has been cut. Many neighbors on the west side of Edgewood keep their windows closed facing the west with its diminished forest to diminish this steady noise.
3. The process of cutting down more eucalyptus and replacing them with native species will cause a serious problem for the existing wildlife (humming birds, butterflies among others) which have adapted since the eucalyptus trees were introduced in the 1880ties. It will be at least 20 years before these adapted species return. A similar suggestion 20 years ago to cut down the eucalyptus trees in the GGNRA in Tennessee Valley in Marin County and replace them with native species was turned down after it was pointed out that birds and butterflies had made an excellent adaptation which would be interrupted by cutting down mature eucalyptus trees.

Recommendation: With these factors in mind, I strongly recommend conservative maintenance of UCSF forest avoiding cutting mature healthy trees with the main aim to preserve the integrity of the forest.



Alan Z. Skolnikoff, M.D.  
205 Edgewood Ave.  
415 661 5176

From: [Christy Svanemyr](#)  
To: [Campus Planning - EIR](#)  
Subject: Please don't cut down our forest  
Date: Monday, March 04, 2013 12:39:20 PM

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Dear Diane,

I wanted to take a moment to write you personally because I have a background in Recreation, Tourism and Sustainable development from West Virginia University. I understand the importance of restoring native species to certain areas where foreign growth has taken over. However I think it would be a HUGE mistake to do it on Mt Sutro. First the eucalyptus forest has become known as a cloud forest and is an incredibly beautiful and magical gem in the center of the city. We often hike our dog through the trails, and it's hard to believe it is right out our back door. We live on Crestmont Drive, so another concern of mine would be the use of pesticides because I have an infant and do not want her exposed to dangerous chemicals. I was told they would be used to keep the eucalyptus from coming back. Wind is also another huge concern up here because we do get a lot of it and having no trees would make it so much worse.

There are also talks of a new development and new houses being built and that on top of losing our beautiful forest is just too much for this quiet community. I'm totally in support of creating a beautiful recreation area for people to get away to, I just think there should be some reconsideration as to how the money is spent in doing so.

Thank you for your time,

Christy  
359 Crestmont Drive

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"The time will never come that you will reach your idea of maturity. It is an endless process. So whether you feel qualified or not, all you have to do is accept the position and do your best with wholeheartedness. The position is in a bigger scale than the person you take yourself to be." Katagiri Roshi



From: [Randiswindel](#)  
To: [Campus Planning - EIR](#)  
Subject: UCSF Mount Sutro Management Project Community Input  
Date: Monday, March 04, 2013 12:01:44 PM

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Diane Wong  
UCSF Campus Planning

Dear Ms. Wong:

I have read most of the Draft EIR and attended the Public Hearing on Feb 25, 2013. I live at 1626 Shrader St. and enjoy hiking the forest on a regular basis. I appreciate what the Sutro Stewards have done and take their support of the UCSF plan into serious consideration. I acknowledge that there may be health and safety concerns and liability for UCSF if the forest is left as is and that UCSF has no desire or intention to clear cut the forest. It is also obvious that all dead trees and those that threaten homes should be removed ASAP. I also appreciate that UCSF has encouraged community involvement throughout the process. That being said, I feel that this project should NOT GO FORWARD at this time until certain issues are resolved.

I am no expert on fire risks or mitigation but I think there are arguments, data, experts and facts that can be used to support both sides of the issue as it relates to Mt Sutro. Anecdotally, as a person who lost a home in The Old Fire in Cedar Glen in 2005, although the conditions were very different, we had cleared our property of all dead and dying trees and had spacing much greater than 30-60 feet. We still went up in flames as did many of our neighbors.

I also know that the draft EIR includes hundreds of pages in the appendix relating to pesticide use and how it will be responsibly applied. Again, I'm no expert but as a lymphoma patient at UCSF (MRN#55670307) i am concerned about my own health as well as that of my neighbors and the critters.

And as for clearing trees to enhance views from trails, there are plenty of places to hike or drive to in San Francisco if you want a view. That's not what we need in this forest.

I have 2 areas in the Draft EIR that I want to comment on specifically which suggest that UCSF is being less than transparent, likely the result of the vehement resistance it has faced recently.

In the FAQ sheet handed out on Feb 25 both points 1, 2 and 3 suggest that there is no plan to cut down 30,000 trees and that "someone may have been confusing the report with a final management plan...based on ...demonstration areas." Referring to EIR section 2.2.2 Continued Implementation under Executive Summary it states,"For purposes of this EIR, it is assumed that all lands would be subject to proposed vegetation management actions noted in this Project Description.."(This could in fact result in 60%+ trees being removed)

Also under Executive Summary refer to table 2.0-1 Summary of Impacts and Mitigation Measures. Under section 4.1 Aesthetics Impact AES-2 states "The proposed project could substantially degrade existing visual character or quality of the site and its surroundings." This has been deemed to be "less than significant" requiring "No project level mitigation required." ARE YOU KIDDING ME?!?! I realize that beauty is in the eye of the beholder and that although I may enjoy a magical ivy covered, dense forest with blossoming plums, acacias and other non native species, not everyone does. However to suggest that removing all of this plus 30-60 ft spacing cannot possibly degrade the visual character or quality is laughable at best.

A possible next step ( **after halting implementation**) might be to include community representatives, arborists and environmental specialists from UCSF, Sutro Stewards, SaveSutro and Hills Conservation Network to come up with a plan more agreeable to all constituents. There is no doubt we all want to preserve this remarkable urban forest and I think we can find a way to work TOGETHER to do this.

Respectfully,  
Randi Swindel  
1626 Shrader St.  
S.F. 94117

From: [ADI SHAKTI](#)  
To: [Campus Planning - EIR](#)  
Subject: Mt Sutro Forest  
Date: Tuesday, March 05, 2013 11:02:44 AM

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Hello,

I was made aware of the plan to eliminate 30,000 trees and spray Garlon pesticide, and am writing to request that you don't follow through with this plan. I am not clear on the benefits this would offer but am clear on the detrimental environmental effects. PLEASE DON'T.

Thanks you, Adi Shakti

From: [Suzanne Bryan](#)  
To: [Campus Planning - EIR](#)  
Subject: Please leave Mt Sutro AS IS  
Date: Wednesday, March 06, 2013 9:51:49 PM

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As a regular user of Mt Sutro's trails and neighbor to this urban treasure, I am dismayed at your proposal to remove many of the trees there. Please leave the forest as it is, non-native species and all. I can see no positive outcome from your plan, short or long term. If fire is your concern, and it's unclear that it is, spend the funds on improving fire fighting ability on the Mt.

Thanks,

Suzanne Bryan  
1339A 5th Ave  
San Francisco, CA 94122

*Hope isn't given to you, you get it when you take action.*



Please consider the environment before printing this e-mail.

From: [Patricia Greene](#)  
To: [Campus Planning - EIR](#)  
Subject: Comments on the Feb 2013 EIR  
Date: Wednesday, March 06, 2013 5:28:06 PM

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Dear Ms. Wong,

I went to the Feb 25 hearing, and heard many strong objections to any cutting of trees in Sutro Forest. I do not agree with those who think nothing should be done. I walk frequently in the woods; I used the older trails for many years prior to the work of Sutro Stewards and now use the trails that they have provided. It is obvious to me that some management will benefit the forest. However, I am shocked by the extent of tree thinning and vegetation removal that the EIR is permitting, and I am also shocked by the extent of herbicide use permitted in this document. I went to some (but not all) of the early workshops and on a walk led by a forester in 2009 around the Surge Parking Lot. It seemed like the changes that were proposed then were much more modest than those I see in the 2013 EIR.

On the 2009 "walk", I remember the forester downplaying the fire hazard of this particular forest in this drippy location, especially if small trees- a few inches in diameter-- were removed (not nearly up to 12 inches in diameter as this document seems to indicate). I also remember the forester looking at the old wooden fences that border the Edgewood backyards and commenting that they provided some of the best tinder around. Is this all a false memory?

At the workshops, I remember fairly universal community outrage at the planned herbicide application. I have been trying to find some reassurance that the objection has been addressed in EIR. I can find acknowledgement of the objection, I can even find acknowledgement of the hazards to the environment of the extensive use of herbicides, in particular to small animals and insects, but I find no indication of any plans to circumvent its use.

The EIR seems to recognize that activities aren't supposed to destroy songbird nests, and I think I read somewhere that the proposed work would begin in the fall. But it seems like a lot of understory clearing is already taking place (primarily around the junction of Edgewood/Woodland trails, which I believe is in Demonstration Area 4, and also a very large patch along the Woodland Historic Trail (Interior Greenbelt or UCSF Reserve?). I believe that the American Robins, Song Sparrows, Dark-eyed Juncos, and Anna's Hummingbirds will adapt to the proposed drastic thinning of trees and clearing of the understory, but what about the Pacific Wrens? Right now (early March), these tiny birds are perched at about eye level singing gloriously. My primary walking route takes me up the Edgewood trail to the North Ridge trail to the summit and back via the East ridge and Mystery Trail--Demonstration Areas 3 & 4 border much of this route. I cross many Pacific Wren territories on this walk, maybe a dozen. I have gone on bird walks at many sites in SF and around the Bay Area, but none compare to Sutro Forest for hearing and seeing Pacific Wrens. I am quite sure that this population does not go elsewhere when it finishes breeding; they live in the understory, and they can be observed all year by listening for their scolding calls and searching quietly. It is hard to see how this population of Pacific Wren can survive removal of 90% of the underbrush, and those that do remain will be probably be

among the 'small animal' targets of herbicide toxicity.

I live in the neighborhood at the Woodland/Willard intersection, and enjoy the fog and wind block that the forest provides--a little pocket with a little more sun. If the extensive clearing of trees and underbrush described takes place, I believe that there will still be some kind of forest left, but if the drastic thinning and understory removal is carried out and extended beyond the demonstration areas, it won't be Pacific Wren habitat, and it won't provide the wonderful wind break that we now enjoy.

Yours respectfully,  
Pat Greene

\*\*\*\*\*

Patricia Greene  
145 Woodland Avenue  
San Francisco, CA  
415 566 6637  
greene@cgl.ucsf.edu

From: [Michael Harabin](#)  
To: [regentsoffice@ucop.edu](mailto:regentsoffice@ucop.edu); [Campus Planning - EIR](#)  
Subject: Save Sutro Forest  
Date: Thursday, March 07, 2013 9:49:15 AM

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Dear Sirs,

If the news I have heard is accurate I am writing to protest most strongly about the cutting of trees on Mount Sutro. I can see no benefits from this action for any party and only distress to the local residents, wildlife populations and general peace and quiet and enjoyment of our homes.

Native or non-native, mature trees (and undergrowth) are wonderful things and deserve to be preserved - so does the quiet enjoyment of our homes.

Michael Harabin  
178 Locksley Avenue, Apt 1  
SF CA 94122  
310 405 5711

From: [Deborah Evans Skidmore](#) To: [Campus Planning - EIR](#); [Campus Planning - EIR](#) Subject: Sutro open space reserve Date: Thursday, March 07, 2013 11:36:09 AM

Dear Ms. Wong,

I am a resident of Edgewood Avenue and am very much in favor of the UCSF proposal to remove many of the Blue Gum trees and to make the forest both a safer place to take a walk and a safer place to live near. Instead of using any pesticides on the underbrush I would like to suggest hiring people to manually remove the undesired plants. It would provide jobs and training and protect insects and wildlife in the Reserve.

Our friend was visiting from Australia last week and he was appalled that people do not seem to understand how devastating the trees are when ignited and how destructive they are to lives and homes.

During the 35 years I have walked in the forest there have been a few close calls when branches broke and fell nearby. With more and more visitors in the open space the likelihood of the dead and aged trees actually injuring or killing someone increases.

My thanks to UCSF for trying to protect the people and the Open Space Reserve.

Sincerely,

Deborah E Skidmore 202 Edgewood Ave San Francisco, CA 94117



From: [mturilin@gmail.com](mailto:mturilin@gmail.com) on behalf of [Mikhail Turilin](#)  
To: [Campus Planning - EIR](#)  
Subject: Save Sutro forest  
Date: Thursday, March 07, 2013 5:42:51 PM

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Please stop your plans of destroying Sutro Forest. Mikhail

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/Michael Turilin

From: [William Barnaby](#)  
To: [Campus Planning - EIR](#)  
Subject: Mt. Sutro Open Space Preserve  
Date: Friday, March 08, 2013 1:51:01 PM

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Ms. Wong:

I am writing to express my support for UCSF's plan to save Sutro Forrest by removing dying eucalyptus trees and invasive ivy, etc. and planting a wider variety of sustainable trees. I look forward to the project's getting underway as it will create a much healthier space.

Sincerely yours,

William Barnaby  
87 Woodland Ave.  
S.F. 94117



MAR 12 2013

CAMPUS PLANNING  
OFFICE

UCSF Campus Planning  
Box 0286  
San Francisco, Ca. 94143-0286

March 8, 2013

RE: UCSF Draft EIR Plan:

I write to oppose the plan developed by UCSF that if implemented, will result in the elimination of 30,000 trees in the Mount Sutro area.

I have lived on Parnassus Avenue for over 65 years and have marveled at the beauty of the forest that borders it. Over the years, I have also seen the inexorable expansion and development of the U.C Campus and the gradual removal of section of trees behind the hospital. Now, we appear to be at the point where the ecological survival of this magnificent forest is seriously threatened. The gradual decline of the forest has become apparent. U.C has abdicated its stewardship claiming that it is impossible to maintain the forest and according, will have to remove the trees. Of course, it is apparent that the real purpose is the expand its building footprint. At this point, the forest has been and continues to be thinned. The winds have increased as sections of trees are removed. Soil is eroding along Medical Center Way and along the hiking trails. Mountain bikes have scoured the dirt creating dust and erosion. A small but vocal minority are attempting to change the forest habitat in order to introduce native species plants to replace the existing trees. This is but a portent of things to come if the draft plan is implemented.

UCSF appears to be committed to removing this historic forest for the sole purpose of expanding its building footprint. This cannot be allowed to happen to the largest, oldest and most dense forest in San Francisco. If it does, the results will be untenable: high winds, noise, soil erosion, habitat loss and an even greater fire danger. The Draft EIR acknowledges these potential effects, but chooses to downplay them claiming that the roots of the removed trees will hold the soil. The Plan further states that the understory habitat will be removed through mowing, insecticide spraying and the use of goats.

UCSF has always worked with the community to address issues of mutual concern. The proposed Draft represents a plan that goes beyond the immediate community. Mount Sutro forest is part of the legacy handed down to us by earlier visionaries who recognized its importance to the City. It is the responsibility of each one of us to preserve and maintain its historic significance.

Thank you for your consideration,



Mary Ann de Souza  
311 Parnassus Ave.  
San Francisco, Ca. 94117

Cc: U.C Board of Regents

From: [Minette Gutfreund](#)  
To: [Campus Planning - EIR](#)  
Subject: Feedback on UCSF DEIR  
Date: Friday, March 08, 2013 10:48:35 AM

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Hello Ms. Wong,

I got your contact info from our neighbor who had an email from Craig Dawson. I just wanted to let you know that we live on Alma Street near Cole Street, and I hike the trails on Mt. Sutro several times a month with great pleasure.

I think it is a great idea to thin out some of the Eucalyptus, and I also like the idea of restoring a part of the area to a native grassy field as it was originally. I agree with the findings of the report that the density of trees poses a fire hazard. I hope that one small group of noisy radicals do not stand in the way of these improvements to this cherished open space.

However, I will add that I was not aware of these plans until there was a front page story in the SF Chronicle about the dispute over the EIR report. I would hope that UCSF can better publicize the public hearings so that all the neighbors are aware of these events. You might contact the Cole Valley Neighborhood Association to get the word out through that group as well.

Regards,  
Minette

Minette Gutfreund  
Alma Street Media  
mobile: 415-971-5070  
office: 415-665-0752  
[minetteg123@gmail.com](mailto:minetteg123@gmail.com)

**From:** [B Line Marketing- Brooke Spilberg](#)  
**To:** [Campus Planning - EIR](#)  
**Subject:** Save my backyard, my clean air, our playground, the green envy of the city-- the Sutro Forest!  
**Date:** Friday, March 08, 2013 11:30:00 AM

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Diane Wong,

Please save my backyard and our SF retreat! My family and dog love those forests and feel they provide some great shelter from the wind and the root system ensures that the rocks and mud doesn't keep our homes from sliding. I'm very concerned about the drastic reduction in trees and the toxic pesticides you're planning on spraying throughout the area. Don't spend money on this poison, but consider spending it on planting Sequoias, pines and Cypress trees instead. Once those grow then consider cutting back on some of the Eucalypti trees. But by all means, do NOT clear cut the Sutro Forest!

There are other places to build or grow. Why would a public university want to get rid of one of its biggest assets? Promote the school and area by sharing more about the neighboring trails and hikes in the forest instead.

The DEIR is very aggressive and doesn't consider the cumulative actions of cutting down thousands of trees, when SF Recreation and Parks Dept is also felling thousands of trees, both as part of the Native Areas Program and tree-removal for other reasons, as is the Golden Gate National Recreation Area. This will result in very significant impacts that are not considered.

The fact is, the Sutro forest is young and in the prime of its life. Eighty-two percent of the forest is blue gum eucalyptus. Blue gums live in Australia from 200 to 500 years. (1) They live toward the longer end of that range in milder climates such as the San Francisco Bay Area. The blue gum eucalypts were planted on Mount Sutro in the 1880s. It is still a young forest.

The DEIR contradicts itself. Study plots used by the Draft Environmental Impact Report (DEIR) to calculate how much carbon is stored in the trees found that 77% of the trunks of the trees are 5 inches in diameter at breast height or less (if the study plots are representative of the entire forest, which is questionable). It also says that this species of eucalyptus grows very fast and that its trunk is 9 inches in diameter after only three years of growth. In other words, the DEIR claims that the trees are old and no longer growing, yet it says that most of the trees are very small and it intends to destroy the small trees, not the big ones. This is just one of many contradictions that we find in the DEIR.

In 2010, UCSF applied for another fire hazard mitigation grant from the California Fire Safe Council. The Council has funded 150 such grants in California, but they denied UCSF's application. That suggests that the California Fire Safe Council shares FEMA's opinion.

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

Thanks in advance for your help!

Neighbor of the Sutro Forest--  
Brooke Spilberg

--

Brooke Spilberg  
Direct: 415-933-0045

From: [miriam.gould](#)  
To: [Campus Planning - EIR](#)  
Subject: Sutro forest  
Date: Monday, March 11, 2013 1:07:17 PM

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Dear Diane Wong;

I am writing to urge that whatever plans are made for Sutro Forest be done gradually with attention to preserving the character of the sylvan area. I have chosen to live adjacent to the forest since 1946 and welcome its increased use by hikers and others enjoying its quiet bit of nature in the heart of the city. I think the native plant purists are too extreme, as many of the plants have been a welcome addition to the city. This includes some of the old Eucalyptus that are nothing short of majestic. I strongly object to the use of pesticides and herbicides as they are not consistent with the native plant precepts. The destruction of so many trees, native or introduced, will undoubtedly change the ecosystem and disrupt the life of the raccoons, skunks, squirrels, red tailed hawks, mourning doves, ravens, opossums possibly devastating their habitat.

While the neglect of the forest may present a fire hazard, removal of the fallen or diseased trees and fallen limbs etc would take care of that problem without ruining one of the beautiful areas of the city.

I would hope a more moderate approach to the forest than the extreme one the university proposes.

Sincerely yours,

Miriam Gould, M.D.  
Alumna and retired employee UCSF

March 11, 2013

As a homeowner on Edgewood Avenue for the past 40 years, I am writing to ask you to consider carefully the following requests as you finalize plans for the beautiful and important Mt. Sutro Forest:

1. No herbicides should be used in the forest.
2. Remove only decayed, dieing, or dead trees.
3. Do not cut the forest so that there is only 1 tree every thirty feet!  
That would virtually destroy the beauty and windbreak it affords us.

Thank you for taking a responsible approach to your stewardship of our forest.  
We rely on you to act in a balanced and reasonable way to maintain a green area for all of us.

Sincerely,

A handwritten signature in cursive script, appearing to read "Marsha Irwin".

Marsha Irwin  
229 Edgewood Ave.  
San Francisco, CA 94117  
415-664-5450





Post Office Box 460002  
San Francisco, California 94146  
March 12, 2013

Dianne Wong  
UCSF Campus Planning  
Box 0286  
San Francisco, California 94143-0286

Dear Ms. Wong,

Many of us are very concerned by UCSF's plans to remove the mountain habitat situated behind the Hospital: We protest! At a time when every tree is needed in our fight against climate change, UCSF is planning on cutting down 30,000 trees from Mount Sutro forest.

For the past 125 years, Mount Sutro's 74-acre forest has served many functions:

- **Improving the Quality of Life Around the Bay Area:** As San Francisco's largest urban forest, Mount Sutro acts as a filter to the City's noise and air pollution. Its dappled light, its towering canopies, its birdsongs, and fragrant aromas offer a healing balm to thousands of Bay Area residents retreating there to revitalize themselves.
- **Oxygen Production and Carbon Dioxide Sequestration:** This Eucalyptus forest provides all San Franciscans with much needed oxygen. Moreover, the forest itself serves as basin to collect carbon dioxide. As such, it actively contributes to lessening Americans' large, carbon footprint.
- **Animal Habitat:** As a fully functioning forest, it generously provides a habitat for diverse animals and plants. These trees and animals, although silent, are part of our community and must be protected.
- **Wind Break:** Because winds accelerate up the hillside, the forest protects nearby land and homes from fire, and the surrounding neighborhoods from fierce, intemperate winds.

On February 25<sup>th</sup>, 2013, UCSF hosted a pro-forma, town hall meeting to collect comments about their Environmental Impact Statement. Approximately two hundred people attended, with 95% of the attendees arguing that this forest is part of the commons, a legacy belonging to all people, not merely to UCSF nor the Board of Regents.

UCSF states that it is razing this forest in an effort to "restore" the area with native plants, yet there are many degraded plots around the City where they could focus their efforts.

Moreover, some of the recently planted native plots around the City have neither prospered nor been maintained.<sup>1</sup>

UCSF intends to raze 30k trees over a 61-acres, and then slather the area with toxic herbicides, that will kill the hawks that inhabit the forest, while contaminating the Bay.

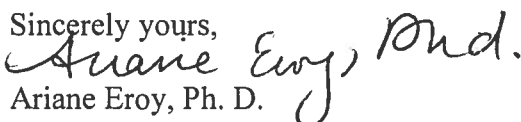
According to the Count of **San Francisco's Precautionary Principle**, any environmental plans that threaten serious or irreversible damage to local ecosystems must be disallowed. We would argue that UCSF, a publicly owned University funded by tax payers, be held to the same standard as all others, that it too must abide by the Precautionary Principle that is law within the City and County of San Francisco.

UCSF attempts to subvert such requirements by arguing that the forest is old and decrepit, that deforestation protects against conflagration. Yet like UC Berkeley (which intends on razing 80k trees from Strawberry and Claremont Canyons), UCSF has not been able to provide any scientific proof that clear cutting would protect the surrounding habitat from fires, nor substantiate such claims before FEMA.

In fact, because Mount Sutro is a cloud forest, living off the fog rising from the ocean, its forest floor is moist all year round. Moreover, Mount Sutro is home to a 125-year old forest of 450,000 trees: This alone is testament to the fact that there have been no major fires within the forest itself in over a century. Although the forest has been in the area longer than any humans alive, it is a relatively young forest on its own terms. Given the opportunity, Eucalyptus trees can live up to 400 or 500 years.

At a time when global warming threatens the Planet with drought, fierce storms, and rising temperatures that could extinguish life, not only in the ocean, but on land itself, we need to be preserving our extent forests and planting additional trees. At a time when teachers are being decommissioned and the UC system is struggling to find funding to ensure its students access to what they need, we ask that such an expensive and careless land development plan be stopped.

We have a duty to protect the environment. We have to act on behalf of a higher law, the law of the Earth (Shiva, 2013). Thus, we would urgently request that you do everything in your power to prevent UCSF and the Board of Regents from decimating this natural treasure that lives in the heart of San Francisco. Killing 30 thousand beings must be considered for what it is at the moment, and over time: genocide, if not, ecocide. We, your neighbors, state that *if we do not protect the integrity of life, if we do not halt climate change, we are doomed as a species.*



Sincerely yours,  
  
Ariane Eroy, Ph. D.

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<sup>1</sup> *We Americans must mature beyond the human-centric notion that we can do whatever we want, whenever we want, and expect to survive the suffering we cause to the environment. We need to alter the way we perceive the world, for we inhabit a living ecosystem (Barlow, 2011).*

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DEMOCRACY IN ACTION

# Halt UCSF's plan to remove 30K trees from San Francisco

By Arlane Eroy, Ph.D. (Contact)

To be delivered to: The San Francisco Board of Supervisors, Supervisor, California Board of Regents, Assembly Member Tom Ammiano (CA-17), The California State House, The California State Senate, and Governor Jerry Brown

## PETITION STATEMENT

Stop UCSF's proposed cutting down of 30,000 trees in the heart of San Francisco!

## Petition Background

At a time when climate change threatens continued life on the planet, UCSF plans on removing 30,000 trees from San Francisco's Mount Sutro. Take Action! Contact the Governor, the California Board of Regents, and the San Francisco Board of Supervisors. If they do not respond, take to the streets! Save Our Planet (S.O.P.)!

There are currently 107 signatures

NEW goal - We need 200 signatures

## Previous petition signers

#107	Sherri Samu	Feb 24, 2013	San Francisco, CA
#106	William S Anderson	Feb 19, 2013	Redwood City, CA
#105	Sandra Anderson	Feb 19, 2013	Redwood City, CA
#104	Michelle Welk	Feb 19, 2013	Burbank, CA
#103	Chip Goldstein	Feb 18, 2013	Half Moon Bay, CA
#102	Elizabeth	Feb 18, 2013	Hayward, CA
#101	Denise Shermer	Feb 18, 2013	San Francisco, CA
#100	Catherine Martin	Feb 17, 2013	SAN FRANCISCO, CA
#99	eileen arbues	Feb 17, 2013	san mateo, CA

I'm a native San Franciscan who continues to live in the Bay Area and visit the City with regularity. Removing these trees is both unnecessary, harmful to local wildlife and an egregious waste of money. Please do not pursue this action as it benefits no one, least of all the local wildlife that call this forested area their home.

Dear The San Francisco Board of Supervisors, Supervisor, California Board of Regents, Assembly Member Tom Ammiano (CA-17), The California State House, The California State Senate, and Governor Jerry Brown,

We are pleased to present you with this petition affirming one simple statement:

**"Stop UCSF's proposed cutting down of 30,000 trees in the heart of San Francisco!"**

Attached is a list of individuals who have added their names to this petition, as well as additional comments written by the petition signers themselves.

Sincerely,  
Ariane Eroy, Ph.D.

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Sherri Samu  
San Francisco, CA 94122  
Feb 24, 2013

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William S Anderson  
Redwood City, CA 94062  
Feb 19, 2013

---

Sandra Anderson  
Redwood City, CA 94062  
Feb 19, 2013

---

Michelle Welk  
Burbank, CA 91505  
Feb 19, 2013

---

Chip Goldstein  
Half Moon Bay, CA 94019-2295  
Feb 18, 2013

---

Elizabeth  
Hayward, CA 94545  
Feb 18, 2013

---

Denise Shermer  
San Francisco, CA 94115  
Feb 18, 2013

---

Catherine Martin  
SAN FRANCISCO, CA 94117  
Feb 17, 2013

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I'm a native San Franciscan who continues to live in the Bay Area and visit the City with regularity. Removing these trees is both unnecessary, harmful to local wildlife and an egregious waste of money. Please do not pursue this action as it benefits no one, least of all the local wildlife that call this forested area their home.

eileen arbues  
san mateo, CA 94402  
Feb 17, 2013

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Colleen Twisselman  
San Carlos, CA 94070  
Feb 16, 2013

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kris hoogerhyde  
san francisco, CA 94110  
Feb 16, 2013

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Kristine Moore  
Beaverton, OR 97006  
Feb 16, 2013

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H Thompson  
San Francisco, CA 94114  
Feb 16, 2013

---

Molly  
Burlingame, CA 94010  
Feb 16, 2013

---

Jenny Josephian  
Berkeley, CA 94709  
Feb 16, 2013

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Robert  
Sacramento, CA 95816-5028  
Feb 15, 2013

---

Rich Teich  
San Francisco, CA 94129  
Feb 15, 2013

---

Shane Ross  
Oakland, CA 94608  
Feb 15, 2013

---

Carol Mo  
Select an Airport, CA 94116  
Feb 15, 2013

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SEAN WINSTON  
LOS ANGELES, CA 90044  
Feb 15, 2013

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ENOUGH IS ENOUGH ALREADY!!

Jeffrey Blair  
Bakersfield, CA 93307  
Feb 14, 2013

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Patrick Tully  
Beverly Hills, CA 90213  
Feb 14, 2013

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Marlene Paniagua  
Rancho Cucamonga, CA 91737

Feb 14, 2013

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Cordell Emery  
St. George, UT 84770  
Feb 14, 2013

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Mona Lawrence  
Peachtree City, GA 30269  
Feb 14, 2013

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Come on. 30,000 trees?! NO! Learn to adapt to the environment, not force the environment to adapt to humans. THAT is why this planet is dying! Please... stop. ADAPT to the environment! The earth has no voice. I do. So do others. Please stop! -- Thank you!

Hal Helmboldt  
Junction City, KS 66441  
Feb 14, 2013

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David Sherman  
Santa Rosa, CA 95405  
Feb 14, 2013

---

Karen Kennedy  
Oxnard, CA 93030  
Feb 13, 2013

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Lisa Duhl  
Kensington, CA 94708  
Feb 13, 2013

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Jax'n Eldridge  
Eureka, CA 95502  
Feb 13, 2013

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Think again, we so desperately need trees added to the environment WHY would an organization supposedly dedicated to 'health' even consider such a move....I know, I know....but PLEASE don't do it!!!

Sally P Stewart  
Richmond,, CA 94805  
Feb 13, 2013

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Laura Cipollari  
Manhattan Beach, CA 90266  
Feb 13, 2013

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cathy jerz  
Riverside, CA 92508  
Feb 13, 2013



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Francisco Diaz  
Richmond, CA 94804  
Feb 13, 2013

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Brian Newhard  
Huntington Beach, CA 92646  
Feb 13, 2013

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Do not remove the trees!

Ruth McKowen  
Alameda, CA 94502  
Feb 13, 2013

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Clara Hendon  
Venice, CA 90291  
Feb 13, 2013

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Scott M. Holdaway  
San Jose, CA 95136  
Feb 13, 2013

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CAROL LAWSON  
Windsor, CA 95492  
Feb 13, 2013

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Barbaria  
Cupertino, CA 95014-4407  
Feb 13, 2013

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Susan M. Harris  
Riverside, CA 92501  
Feb 13, 2013

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Monique Soares  
Freedom, CA 95019  
Feb 13, 2013

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What is the purpose of cutting down trees? Are more parking spaces needed? Dr. G. del Castillo

De. G. del Castillo  
San Diego, CA 92131  
Feb 13, 2013

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Beverly Nissenson  
Benicia, CA 94510  
Feb 13, 2013

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Steve Kehela  
Studio City, CA 91604  
Feb 13, 2013

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Heather Mills  
Cotati, CA 94931  
Feb 13, 2013

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Wendy  
Jenny Lind, CA 95252  
Feb 12, 2013

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Donna McKibben  
San Francisco, CA 94122  
Feb 12, 2013

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Jamille  
San Francisco, CA 94117  
Feb 12, 2013

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Terry Ermini  
Sacramento, CA 95825  
Feb 11, 2013

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T  
La Habra Hts, CA 90631  
Feb 11, 2013

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Mary Jane McGeoy  
Daly City, CA 94014  
Feb 11, 2013

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Roy Mapps  
Copperopolis, CA 95228  
Feb 11, 2013

---

Heather  
St. Paul, MN 55108  
Feb 11, 2013

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Pouneh  
San Francisco, CA 94105  
Feb 11, 2013

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This is environmental indifference at its worst.

John Haeger  
Ben Lomond, CA 95005

Feb 11, 2013

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Brian  
Berkeley, CA 94708  
Feb 11, 2013

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30,000 trees positively impact millions of lives, connect us to our earth, and teach us in ways man made buildings cannot. Can you respect this perspective?

Nick Xavier  
Portland, OR 97217  
Feb 11, 2013

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Rebecca  
San Francisco, CA 94117  
Feb 11, 2013

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Leave the trees! we need their presence more than ever in our cities!!!!

Kyle Milburn  
san rafael, CA 94901  
Feb 11, 2013

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Dana Cole  
Sacramento, CA 95820  
Feb 11, 2013

---

Tara Holmes  
San Francisco, CA 94117  
Feb 11, 2013

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Andrew West  
Santa Barbara, CA 93117  
Feb 11, 2013

---

Leave the trees alone,

Sandy  
Roseville, CA 95661  
Feb 11, 2013

---

Cornelius Boots  
Tara Hills, CA 94806  
Feb 11, 2013

---

Jane Jervis  
Terra Linda, CA 94903  
Feb 11, 2013

---

Vicky Estrella  
San Diego, CA 93114  
Feb 11, 2013

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I love the trees of SF. They're what makes this city feel like home.

Dondi Tondro-Smith  
Jackson, CA 83002  
Feb 11, 2013

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tessamarie capitolo  
san rafael, CA 94901  
Feb 11, 2013

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Really? San Francisco remove trees? Please focus on infill projects and not developing on forested lands!

Brian Reyes  
San Francisco, CA 94110  
Feb 11, 2013

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Lee Mitchell  
kensington, CA 94707  
Feb 10, 2013

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These trees are part of San Francisco's history and we need them to keep our air clean. Please do NOT do it!!!!

Aurianne Dorsay  
San Jose, CA 95125  
Feb 10, 2013

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Tim Gallaher  
San Francisco, CA 94117  
Feb 10, 2013

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Keenzia Budd  
Oakland, CA 94607  
Feb 10, 2013

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Liz Borman  
Berkeley, CA 94709  
Feb 10, 2013

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Woody Wu  
San Francisco, CA 94043  
Feb 10, 2013

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Ian Waisler  
San Francisco, CA 94110  
Feb 10, 2013

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Ryan Sakai  
San Francisco, CA 94117  
Feb 10, 2013

---

Ryan Garcia  
San Francisco, CA 94114  
Feb 10, 2013

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Kristin Tieche  
San Francisco, CA 94117  
Feb 10, 2013

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CUTTING THESE TREES WOULD DEVASTATE THE WILDLIFE THAT RELIES ON THIS  
CANOPY!!!

Melissa Forrest  
San Francisco, CA 94114  
Feb 10, 2013

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These trees are ancient, species in extinction that are the lungs of the Paris of America. Let's hope that we don't  
add more sadness to this abused planet.

Jorge Cal  
San Francisco, CA 94110  
Feb 10, 2013

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Jill Hanson  
Gilroy, CA 95021  
Feb 9, 2013

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Elizabeth McAnally  
Berkeley, CA 94702  
Feb 9, 2013

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jerri lee young  
San Francisco, CA 94121  
Feb 9, 2013

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Caroline Lewis  
San Francisco, CA 81145  
Feb 9, 2013

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Jesse Nichols George  
Cedar City, UT 84721

Feb 9, 2013

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There are other ways; please let's use our creative energies in solving this problem. Thank you.

Jocelyn Pittel  
berkeley, CA 94705  
Feb 9, 2013

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anna albuquerque  
berkeley, CA 94705  
Feb 9, 2013

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Please do not chop down or remove the trees - there are other ways to deal with human needs, so let's get creative, and find them. Ways that do not compromise the existence of flora and fauna to such an extent. thanks.

Clare Hedin  
orinda, CA 94563  
Feb 9, 2013

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Keith A Ellis  
Crockett, CA 94525  
Feb 9, 2013

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Maren Askins  
Iowa City, IA 52246  
Feb 9, 2013

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Please save the trees!

Hope Casareno  
San Francisco, CA 94123  
Feb 9, 2013

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Kelsey Parker  
San Francisco, CA 94117  
Feb 8, 2013

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Lauren Hachemeister  
San Francisco, CA 94121  
Feb 8, 2013

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Monte Leach  
San Francisco, CA 94122  
Feb 8, 2013

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Melissa Lago  
Berkeley, CA 94704  
Feb 8, 2013

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Julia Lerner  
Boonville, CA 95415  
Feb 8, 2013

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Stephen Julich  
Berkeley, CA 94705  
Feb 8, 2013

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Emily Feingold  
Concord, CA 94520  
Feb 8, 2013

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Marcia Segura  
San Francisco, CA 94103  
Feb 8, 2013

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Joanna Zweig  
San Francisco, CA 94122  
Feb 8, 2013

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Victoria Spiers  
Berkeley, CA 94703  
Feb 8, 2013

---

Siobhan Edmondson  
San Francisco, CA 94109  
Feb 8, 2013

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Marina Liu  
San Francisco, CA 94118  
Feb 8, 2013

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Joshua Morrill  
Oakland, CA 94611  
Feb 8, 2013

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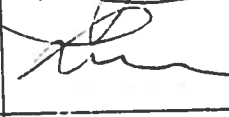


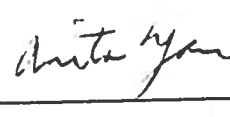
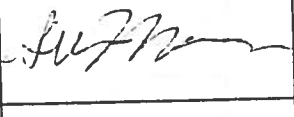
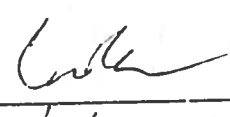
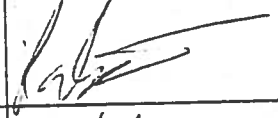
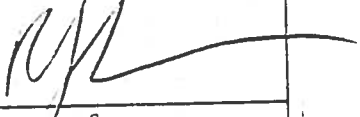
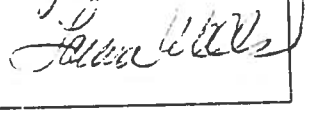
Ariane Eroy, Ph.D.  
San Francisco, CA 94146  
Feb 8, 2013

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Halt UCSF's Plans to Cut Down 30,000 Eucalyptus Trees on Mount Sutro, San Francisco

	Printed Name	Address	Signature
1	Rob Colbert	957 Stannage Ave Albany, CA 94706	
2	Michelle Gallimore	214 Gonzalez Dr. SF CA 94132	
3	Dawn Whitaker	elipticus@yahoo.com	
4	Lindsey Hendricks	linzilora@hotmail.com	
5	Miguel Zumbado	miguel.zuma@yahoo.es	
6	Joel Dolovich	603 Linden Lane Marina, CA	
7	Anita Yan	anita.yan@gmail.com	
8	Sierra Morgan	smorgan756@yahoo.com	
9	C. Connor Robinson	1765 Vallejo Pacific Heights	
10	Gabriel Stern	1765 Vallejo St	
11	Ron Johnson	101 Market SF	
12	Laura Wells	551 Santa Clara CAK	

Halt UCSF's Plans to Cut Down 30,000 Eucalyptus Trees on Mount Sutro, San Francisco

	Printed Name	Address	Signature
13	Firuze Mahmood	1710 Rose St. (A94703)	
14	Teresa Saito	1710 Rose St. CA	
15	SARAH MCDONALD	spatulatronie@yahoo	
16	John Wilson	San Francisco, CA	
17	Ariel Whitten	all-ps@hotmail.com	
18	Gavin Ogawa	gogawa@gmail.com	
19	Tami Etzini	Oakland CA	
20	ROBERT Canfield	8265 OLIVINE AVE CITRUS HEIGHTS, CA 95610	
21	Mary Michele Floor	1271 11th Ave #1 SF CA 94122	
22	John Sergeant	P.O. Box 3675 Oakland, 94609	
23	Linda Lewin	6815 Geary #5 SF CA 94121	
24	Nicholas Jese	150 Kent Apt 1L SF, CA 94133	

mgloor  
earthlink  
net

Halt UCSF's Plans to Cut Down 30,000 Eucalyptus Trees on Mount Sutro, San Francisco

	Printed Name	Address	Signature
25	Sylvie Le Douarin	1710 Hearst Ave. Berkeley CA 94702	Alycia Wong
26	Lucian Naves	2918 Calist St. CA 94703	Lucian
27	Alyssa Chung	2070 OAKLEY AVE MENLO PARK CA	Alyssa Chung
28	Ashley Emery	1345a 17th St SF, CA 94117	Ashley Emery
29	Paula Hendricks	601 O'Farrell St SF, CA 94109	Paula Hendricks
30	Ernest Machen	2136 Ward St Berkeley CA 94705	Ernest Machen
31	Bruce Hicks	802 F Street Petaluma	Bruce Hicks
32	Michelle Edwards	2009 N. Ridgeway Rd Tucson 85712	Michelle Edwards
33	Summer Brenner	Berkeley CA	Summer Brenner
34	Michael Weber	1727 Addison St Berkeley CA	Michael Weber
35	SATISH M.	<del>630 Folsom St</del> gurugi@gmail	M. Satish
36	Jackie Robinson	Jackie Robinson @ Johnson Lane	Jackie Robinson


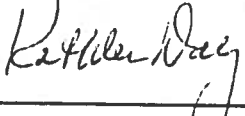
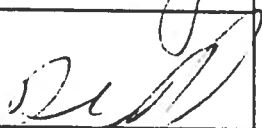



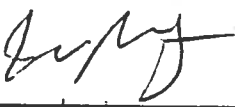
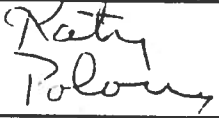
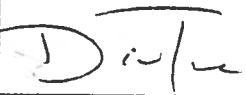

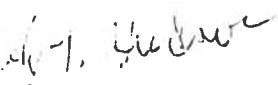
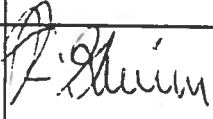
Halt UCSF's Plans to Cut Down 30,000 Eucalyptus Trees on Mount Sutro, San Francisco

	Printed Name	Address	Signature
37	Rebecca Young	2126 Sardin MV CA 94040	Rebecca Young
38	Leif Aarnut	3213 Ellis St. Berkeley, CA 94703	Leif Aarnut
39	Sarah Fielding	9127 Terrace St Oakland, CA	Sarah Fielding
40	ENRIQUE DE ABELLIO	250 Grand View Ave. 94118 S.F.	Enrique De Abellio
41	Diane Overby	215 Riverside Ave Ben Lomond CA 95005	Diane Overby
42	Diane Overby	215 Riverside Hwy Ben Lomond Cal	Diane Overby
43	Sofie Went Lan	1220 Monticney Ave, Berkeley, CA	Sofie Went Lan
44	ARI GOLDSTEIN	SAN FRANCISCO	ARI GOLDSTEIN
45	Sam Briggs	4741 Point Loma Ave San Diego, 92107	Sam Briggs
46	STEVE LYONS	136 SCENIC FAIRFAX 94730	Steve Lyons
47	Linda Watkins	638- 9th Ave S.F. CA 94118	Linda Watkins
48	Aarn Neen	4524 18th St. San Francisco CA 94114	Aarn Neen

Halt UCSF's Plans to Cut Down 30,000 Eucalyptus Trees on Mount Sutro, San Francisco

	Printed Name	Address	Signature
49	Michael Cunningham	551 45th Avenue SF, CA 94121	McC
50	Robert Montal	100 RS B WY WY 10069	Robert
51	Angel Heart	400 Taper Ave, Vallejo	Angel Heart
52	Kim DeCunipo	721 el dorado Vallejo, CA 94590	Kim DeCunipo
53	DANIELE ERVINE	2409 Clement St SF 94121	Daniele
54	Kim White	57 Ventura St. Vallejo, CA 94590	Kim White
55	Sofia Kurasak	2204 Channing Way #6 Berkeley, CA 94704	Sofia
56	MAT BUI	1508 LA BOHEME ST San Jose, CA 95121	Mat Bui
57	Chris Saavedra	814 Linwood & Lane Sebastopol, CA 95472	Chris
58	David Douglass	Luthliffen Berkeley, CA 6131	David
59	Ben Terrall	2940 16th St. suite 216 S.F., CA 94103	Ben
60	Eddie Yuen	1440 Yosemite Rd Berkeley, CA 94607	Eddie




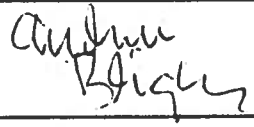
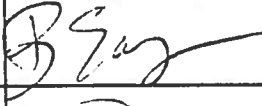
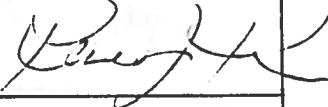


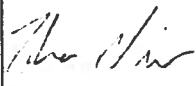
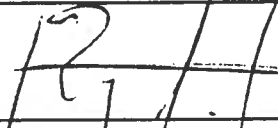
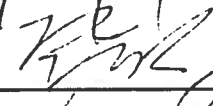
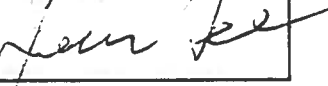
Halt UCSF's Plans to Cut Down 30,000 Eucalyptus Trees on Mount Suro, San Francisco

	Printed Name	Address	Signature
61	SARAH THORPE	1224 BELLEVUE #1 BURLINGAME CA 94010	
62	Kathleen Daly	3900 California #7 SF CA 94118	
63	David Paul	16 Norwalk SF 94110	
64	Seth Chazin	1164 Solano Albany 94706	
65	Lorne Gray	516 Union Berkeley CA 94707	
66	Galen Maloney	137 Linden St Berkeley CA 94710	
67	Jennifer Fong	150 Franklin St SF, CA 94102	
68	KATY DOCCON	1773 10th St OAKLAND	
69	David Tse	470-C Fulton St	
70	Mario Landa-Holdsworth	502 Haight St	
71	Alison Hudson	1101 14th St SF 94114	
72	Ramblat Grimm	3000 Harper St. Berkeley, CA	

Halt UCSF's Plans to Cut Down 30,000 Eucalyptus Trees on Mount Sutro, San Francisco

	Printed Name	Address	Signature
73	Pope, WALTER	P.O. BOX 2202 El Cerrito, Cal 94530	Walter Pope
74	Tim Sanke	1832 Audrey Ave Campbell, CA 95008	Tim Sanke
75	Florenca Gailorri	12, Woodhill Dr. Redwood City	Florenca Gailorri
76	JULIAN R. DELFINO	440 DAVIS COURT ST.	JULIAN R. DELFINO
77	David McClure	478 Belvedere St. S.F. CA 94117	David McClure
78	Heather Deans	730 Randolph St. Apt #5 San Francisco, CA, 94132	Heather Deans
79	Jeff Powell	1150 LA Playa Apt 3 94122, SF, CA	Jeff Powell
80	KARA ROEVLVY	142 GLEN DR. Sausalito CA, 94965	KARA ROEVLVY
81	Matt Chavez	1462 14th Ave S.F. CA 94122	Matt Chavez
82	Lumen Chavez	1462 14th Ave. S.F. CA 94122	Lumen Chavez
83	Jerry Toranzo	377 31st Ave San Francisco CA 94111	Jerry Toranzo
84	Katarina Mewoth	1335 8th Ave SF, Ca 94118	Katarina Mewoth

Halt UCSF's Plans to Cut Down 30,000 Eucalyptus Trees on Mount Sutro, San Francisco



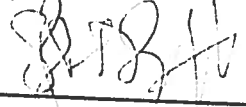
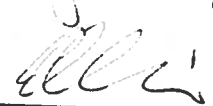


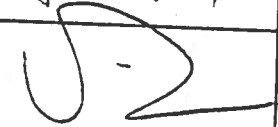


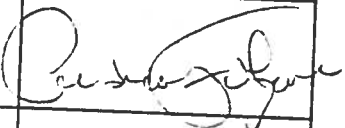
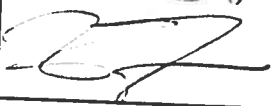
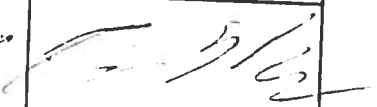
	Printed Name	Address	Signature
85	JESSICA GILKINSON	170 LINDLEY ST. SF, CA 94131	
86	Jonathan Bulson	1524 Waller SF CA	
87	Marco Bulson	1524 Waller	
88	Andrew Bliguet	1220 16th AVE SF CA 94122	
89	Bridget Early	737 5th Ave SF, CA 94118	
90	RENÉE PLETKA	172 Parnassus Ave S.F. 94117	
91	ERIC RANCHERSON	586 31st 94121	
92	Kelly Anders	783 6th Ave SF 94118	
93	THOMAS NIELSEN	324 DELL BROOK AVE SF CA 94131	
94	Roy King	737 5th Ave. SF, CA 94118	
95	Richard Ray	50 Rockridge Dr. S.F.	
96	JOAN LEE	1390 12th Ave #7 S.F., CA 94122	



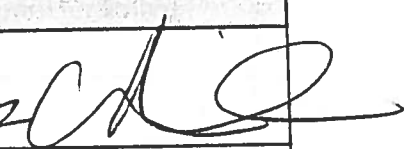
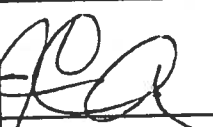
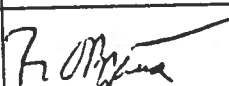

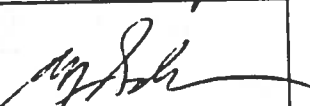



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	Printed Name	Address	Signature
97	Katherine Fuller	3827 25th St San Francisco	Katherine Fuller
98	David Clisham	1470 11th Ave SF 94122	David Clisham
99	Donna Brach	315 Hugo St	Donna Brach
100	Pam Clisham	1470 11th Ave	Pam Clisham
101	CYRUS TABAR	992 VALENCIA ST.	Cyrus Tabar
102	Kayle Graham	1441 8th Ave. San Francisco, CA	Kayle Graham
103	LYDIA MENDOZA	1376 Grader St	Lydia Mendoza
104	Henry Little	"	Henry Little
105	Joe Mannion	1266 Stanyan St SF 94117 #15	Joe Mannion
106	Sally Bland	1370 12th Ave	Sally Bland
107	GAIL BORGER	1355 12th AVE	Gail Borger
108	Daniel Moore	715 Lincoln Way	Daniel Moore

Halt UCSF's Plans to Cut Down 30,000 Eucalyptus Trees on Mount Sutro, San Francisco

	Printed Name	Address	Signature
109	Justin Brown	715 Lincoln, SF	
110	Tim Ingram	94124 1141 Mendocino	
111	Stephen D. Goffey	740 PARNASSUS ST	
112	Alic Heinrich	608 Kirkham	
113	Celeste Friedman	321 10th Ave	
114	Andrea Hamel	1419 41st Ave. SF. 94122	
115	Haylee Corliss	1300 LA HAYA SF 94122	
116	Troy Keon	1330 La Playa street SF, CA 94122	
117	Lucas Bryant	1430 Hyde St. #16 SF, CA 94109	
118	ANDY FALZURRE	259 B Argueta Blvd	
119	POHARIC REYES	4375 MISSION ST.	
120	Travis Klingenberg	1327-A 11th Ave. San Francisco CA	

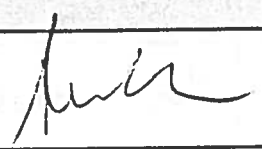
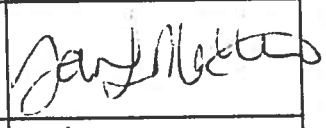
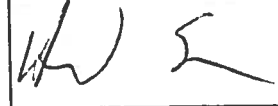
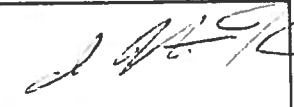
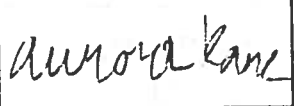
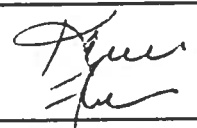
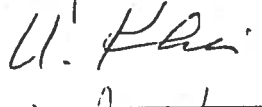
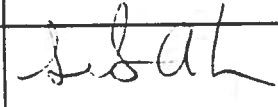
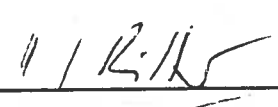
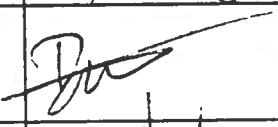
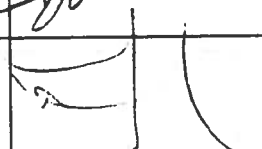
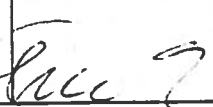
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	Printed Name	Address	Signature
121	Carmen Marecosin	1503 11th Ave SF, CA, 94116-94122	
122	Jackie Chaban	1503 11th Ave SF, CA, 94116-94122	
123		1957 9th Ave SF 94122	
124	N. Juckett	1435 17th Ave SF, CA 94122	N Juckett
125	O. Adams	1309 Irving St SF 94122	O. Adams
126	Greg Schuler	1325 11th Ave SF CA 94122	
127	Maria Se. Sullivan	1479 10th Ave SF Ca	Maria Se Sullivan
128	Jacob Hogecland	147 Dublin SF CA	Jacob
129	Emmy Phoo	24 Merced Ave SF	Phoo
130	MARY HEWETT	445 IRVING ST SF	M Hewett
131	Alhasseri Hamran	403 IRVING ST SF	
132		485 Bryant St SF	

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	Printed Name	Address	Signature
133	Henry Suzuki	718 44th Ave SF 94121	H. Suzuki
134	<del>James</del>	42 45th Ave SF	<del>James</del>
135	PAT McElroy	640 Franklin St	
136	Emily Riedel	Emily Riedel 2558 39th Ave SF. CA. 94116	
137	Jordan Kozey	1420 Addison St. Berkeley, CA	Jordan Kozey
138	Shauna Barbera	415 MORRELL AVE BURLINGAME, CA 94010	SB
139	Heidi Fraser	2403 29th Ave SF 12122 Folsom/37@yahoo.com	Heidi Fraser
140	<del>Adrian</del> <del>Max Salazar</del> <del>12122 Folsom/37@yahoo.com</del>	1. paskeye@gmail	<del>Adrian</del>
141	JAHAN Khanalizadeh	4401 San Leandro St Oakland, CA	
142	Joe Panfili	201 Apollo Blvd	
143	Lily Frisco	1200 Arquello Blvd.	
144	Nestor Bonfanti	2175 43rd Ave	

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	Printed Name	Address	Signature
145	Sunny Pak	1101 Pine St. #102 San Francisco, CA 94109	
146	Tammi Markussen	3126 21st St. San Francisco, 94110	
147	Arvind Sogech	3126 21st St San Francisco 94110	
148	IRIS KANE	2522 SAN JOSE Ave	
149	Aurora Kane	Above	
150	Karen Friedland	2419 Edwards St. Berkeley, Ca 94702	
151	Ursula Klier	6 Westminster Pl Lafayette	
152	Sanil JARILHAN	741 WALLER ST., SF	
153	Hans Ritter	433 Boynton Bk	
154	David Long	905 W. Calhoun Ave Hollywood, CA	
155	Jessica Andersen	35 UNDERHILL Rd Mill Valley	
156	Avnick Thapar	305 E ST. RMC, CA 94062	

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	Printed Name	Address	Signature
157	Lisa Helm	203 Club Dr	LISA HELM
158	ELIZABETH LITVIN	2 Parkside Dr. Davis CA	Elizabeth
159	MARK FELT	226 G Club Dr #226 SF 94123	Mark Felt
160	Bobby Clyburn	1124 Chandler St San Francisco, CA	Bobby Clyburn
161	Martin Stormer	1475 Monterey SF CA 94127	Martin
162	Carlos Turcios	1530 Polk St SF CA	Carlos
163	Dulcinea Deuschel	481 Belvedere St. SF. CA 94115 #3	Dulcinea
164	Joseph BRANDEN	340 Frederick St SF, CA 94117	Joseph
165	Zach Lloyd	127 Carl St SF, CA 94117	Zach
166	Karin Von Borschwig	795 Cole St SF CA 94117	Karin
167	Suzie Pisman	2301 Balboa SF CA 94121	Suzie
168	Randy Heller	1022 G Thompson SF	Randy Heller

Halt UCSF's Plans to Cut Down 30,000 Eucalyptus Trees on Mount Sutro, San Francisco

	Printed Name	Address	Signature
169	Marta Mendez	3433 Mission St #2 San Francisco CA 94112	Marta Mendez
170	Patrick O'Leary	69 29th St San Francisco CA 94110	Patrick O'Leary
171	Clifford Picard	1371 44th Ave San Francisco, CA 94122	Clifford Picard
172	RICHARD JACKSON	1495 GOLDEN GATE #107 SAN FRAN., CA 94115	Richard Jackson
173	Stefan Jackson	41-21st Avenue #121 San Francisco CA 94117	Stefan Jackson
174	DENNIS M O'NEILL	608 ANZA S.F. CA 94115	Dennis O'Neill
175	Jon Mill	3024 Madeline Oakland 94602	Jon Mill
176	John Bacus	15 Hemway Pl SF. 94117	John Bacus
177	Karen O'Leary	64 Bayview Lane Pacifica CA 94053	Karen O'Leary
178	John Bronson	23-11 Leavenworth St SF CA	John Bronson
179	ANTONY GADOLA	1001 STANYAN SF CA 94117	Anthony Gadola
180	Karen Blagov	128 Parnassus St. SF CA 94110	Karen Blagov

Halt UCSF's Plans to Cut Down 30,000 Eucalyptus Trees on Mount Sutro, San Francisco

	Printed Name	Address	Signature
181	Matthew Kelly	2128 21st Ave San Francisco, CA 94116	Matthew Kelly
182	Michael Rodriguez	3423 Vicente SAN FRANCISCO, CA	Michael T. P.
183	Brian Foster	494 Mangels Ave SF CA 94137	Brian Foster
184	JASON A. DRUCKE	225 Coggins Dr. <sup>Apt. 288</sup> Pleasant Hill Cal, 94525	Jason A. Drucke
185	Ruby Wilson	6321 Dover St. #11 Oakland, CA 94609	Ruby Wilson
186	Ashley Adamka	51 Lisbon St. USK SF, CA, 94112	Ashley Adamka
187	Patti Davis	742 Treat SF CA 94110	Patti Davis
188	Sridevi Ramanathan	email sridevi@yahoo.com	Sridevi Ramanathan
189	ELIOT WEISS	weissda2003@ yahoo.com	Eliot Weiss
190	Lauren Freitas	275 10th St. #324 SF, CA 94103	Lauren Freitas
191	Aimee An Frisbee	16 Ritter St. San Rafael, CA	Aimee An
192	Amira Dunn	1580 Southgate Ave 308 Daly City CA, 94015	Amira Dunn



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	Printed Name	Address	Signature
193	SANDRA COZZANES	3599 HIGHLAND DR SAN BIZUNO CA 94026	(S)
194	RUR McAllister	39 Safford St SF CA 94103	Bur McAllister
195	San Escobedo	29 Encantado Loop Santa Fe NM	San
196	Jamie Morris	5125 Martin Luther King Jr Hwy Oakland, CA 94609	Jamie
197	Kertonla Dixon	110 Ponce de Leon Rd City, CA 94015	Kertonla
198	Talia Abraham	38 Chestline Dr. San Francisco, CA 94134	Talia
199	John Hanig	834 Arguello Blvd San Francisco, CA 94118	John
200	Helena Daly	1275 41st Avenue SF, CA 94116	Helena
201	Hope Casareno	3035 Webster St #7 SF, CA 94123	Hope
202	Leslie Deputy	1464 Emerson St. Rm 1120, CA 94115	Leslie
203	Tyler Carr	5 FAIR DR CANEXCEL CA 94101	Tyler
204	Nolan Fenster	465 Brussels St SF CA, 94134	Nolan

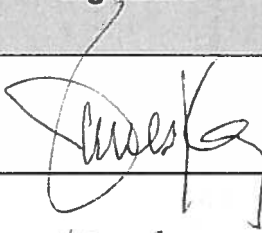


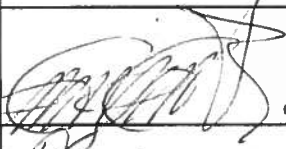

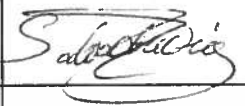
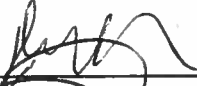

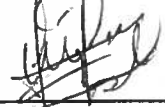

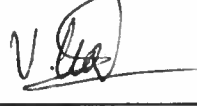
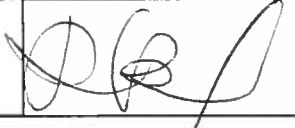
Halt UCSF's Plans to Cut Down 30,000 Eucalyptus Trees on Mount Sutro, San Francisco

	Printed Name	Address	Signature
205	Kelly McNeeley Nothing	1207 Walnut Rd. Fair Oaks, CA 95628	Kelly McNeeley
206	Jay-Renee Bloz	3125 maple ave #14 Oakland CA 94602	Jay-Renee Bloz
207	Adria Torres	1912 15th St SF 94114	Adria Torres
208	Sara Payon	1125 Naples St. SF CA 94112	Sara Payon
209	Chris Dorsett	1269 McAllister St. CA 94115	Chris Dorsett
210	ALANZA DE	345 9th Ave S. Santa Rosa 95607	ALANZA DE
211	Caitlin Graham	895 24th Ave #4 SF, CA 94121	Caitlin Graham
212	Jessica Schroeder	873 de Haro SF CA 94107	Jessica Schroeder
213	Alex Benier	1406 Hearst Ave Berkeley, CA 94702	Alex Benier
214	Evam Milburn	1824 Castleton St Berkeley, CA 94703	Evam Milburn
215	Ann Baird Baird	3327 West St Oakland CA 94608	Ann Baird
216	Tess Eckert	3242 Magnolia St. Oakland CA 94608	Tess Eckert

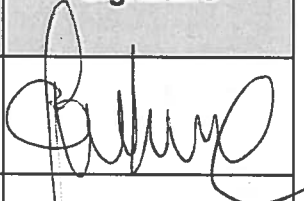
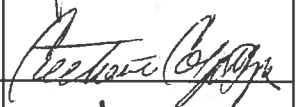
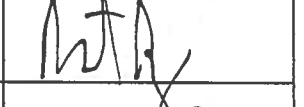
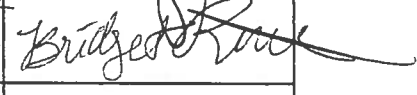

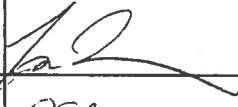

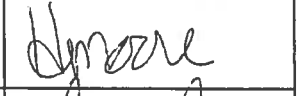
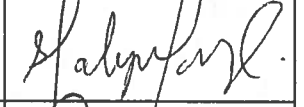
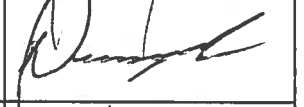
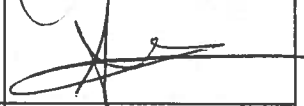
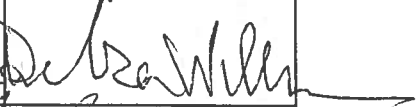

Halt UCSF's Plans to Cut Down 30,000 Eucalyptus Trees on Mount Sutro, San Francisco

	Printed Name	Address	Signature
217	Zhayra Palma	325 Bartlett St San Francisco CA 94130	Zhayra Palma
218	Cassie Clark	438 Staten Ave. #310 Oakland CA 94610	Cassie Clark
219	MaryAnn K Johnston	109 43rd Ave San Mateo, CA 94403	myjohnston
220	Jessa Berkner	858 York St. Oakland, CA 94610	J B
221	Pappy Foxhant	1055 Sanchez SF CA 94114	P
222	Ido Cohen	Sf	Ido
223	Chanelle Aryasingha	1390 Market St #1621 San Francisco, CA 94102	Chanelle Aryasingha
224	Sierra Lesiow Webb	13944 Wolf Hollow Grass Valley CA 95949	Sierra
225	Kennar Lu	999 Bush St. San Francisco CA 94109	Kennar
226	Samantha Prior	2668 Bryant Street San Francisco, CA 94110	Samantha Prior
227	Janet William S	3759 22nd St San Francisco, CA 94114	Janet Williams
228	Carolyn Flog	4252 24th St. SF, CA 94114	Carolyn

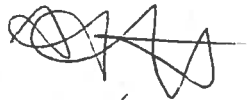
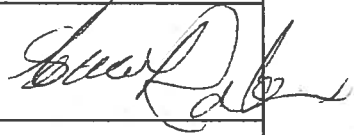
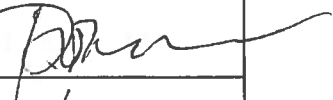
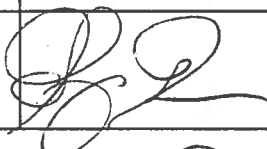
Halt UCSF's Plans to Cut Down 30,000 Eucalyptus Trees on Mount Sutro, San Francisco

	Printed Name	Address	Signature
229	J.M. KELLY	P.O. BOX 460073 SF. CA 94146	
230	G C MELOWE	114 Liberty St CA 94110	
231	LARRY CERCIER	920 HITCHCOCK SF 94122	
232	Gugrini Gilbertina	4068 24th St. San. F. - CA 94114	
233	RON ELLISON	1567 LaSalle 94124	
234	Salvadoria	331 Mission St #203	
235	DAVE O'HLY	1425 Ocean Ave Apt C Seal Beach CA 90740	
236	Karol Utter	1425 Ocean Ave C Seal Beach CA 90740	
237	Mariana Leiva	1290 LAKE St SAN FRANCISCO 94110	
238	Lily Xia	216 Jersey St San Francisco 94114	
239	Vincent Chao	1427 Diamond SF 94131	
240	Rebecca Bernard	13 MONROE ST	

Halt UCSF's Plans to Cut Down 30,000 Eucalyptus Trees on Mount Sutro, San Francisco

	Printed Name	Address	Signature
241	Gabriel Cerro	274 B Redwood SF - CA Way	
242	<sup>Colpetz</sup> Catherine	3336 21st St. 94110	
243	Robert Bayer	577 Eureka St SF 94114	
244	Bridget Rivera	1451 - 21st Ave 94122	
245		415 658 1056	
246	Laurie Chandler	66 Elsie St. SF 94110	
247	Hilary Moore	137 McClintock Dr. Oakland.	
248	Diana Perez	97 Canyon Dr SF CA	
249	Nick Demos	521 EUREKA St SF, CA	
250	Aeryn Merced	1015 Castro St SF CA	
251	Debra Wilkins	303 E 8th St <sup>NYC</sup> 10003	
252	Paul Muel	3899 24th St SF, CA	

Halt UCSF's Plans to Cut Down 30,000 Eucalyptus Trees on Mount Sutro, San Francisco

	Printed Name	Address	Signature
253	Stephanie Stayer	1261 Church St.	
254	CAROL ROBINSON	926 Elizabeth	
255	Donna Lew	dlew55@hotmail.com	Donna Lew
256	Ciel Yogis	Ciel.yogis@gmail.com	Ciel Yogis
257	Connie Burton	1080 TANKARD DR PAUL ATTO 94303	Connie Burton
258	R. POGGIO	710 ALVARO CR. DALY CITY, CA 94014	
259	W. Rumsig	W-sky@skidab.net	W. Rumsig
260	Kelli Backett	381-12th Ave SF	KBackett
261	V.R. Sandy	395 Hill St.	V. Sandy
262	S. Manna	395 Hill St.	S. Manna
263	S. Gandra	395 Hill St.	S. Gandra
264	George Green	180 Riverside Blvd NY NY	


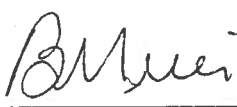

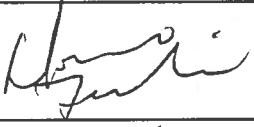

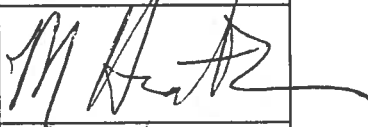
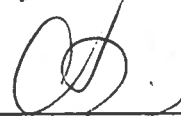
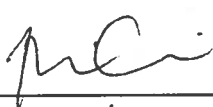

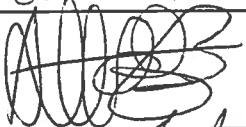
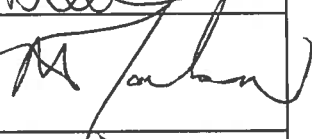
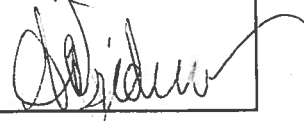
Jocelyn Boreta PO Box 2362  
mill valley



Halt UCSF's Plans to Cut Down 30,000 Eucalyptus Trees on Mount Sutro, San Francisco

	Printed Name	Address	Signature
265	PERRY KLECAK	JF 94114 1158 Church St.	Perry Klecak
266	Heather Brum	759 Edinburgh St	Heather Brum
267	TOM MAZZOLINI	573 Hill St	Tom Mazzolini
268	Elizabeth Chilton	Sevrekas St SF 94114	Elizabeth Chilton
269	Karen Neppz	1065 Alabama St 94110	Karen Neppz
270	Seth Gold	118 SMITH ST Bldg SF	Seth Gold
271	Amy Matteson	3653 Folsom	Amy Matteson
272	Hasanna Rubin	1351 Grove	Hasanna Rubin
273	Jill Smith	7608 23rd St	Jill Smith
274	Yury Hurtado	2432 Bryant St. SF, CA 94110	Yury Hurtado
275	Lindsay Morrison	60 Crastine Dr. SF #2	L. Morrison
276	Nancy To	85 ORA Way #210/ SF # CA 94131	Nancy To

Halt UCSF's Plans to Cut Down 30,000 Eucalyptus Trees on Mount Sutro, San Francisco

	Printed Name	Address	Signature
277	Stacey Morris	Staceyhappens@hotmail.com	
278	BEAT MEIER	86 FAIROARS	
279	Nika Shirani	736 Valencia #402 94110	
280	Dawn K3 Ann	133 Vickburg	
281	Lynn Moscrip	4114 - 23 St. SF	
282	Meghan Heather	401 Molino Dr SF	
283	Caterina Rodrigues	240 Sunnyside Ave. Piedmont, CA	
284	Nina Caviero	3972 25th St. SF	
285		74 Chatterbox St.	Naomi Goodhue
286	Altea Bianchi RETHA	110 Valley St	
287	Matthew Tudor-Jackson	565 Jersey St San Francisco 94114	
288	Shirley Weidman	1609 14th St San Francisco	



Halt UCSF's Plans to Cut Down 30,000 Eucalyptus Trees on Mount Sutro, San Francisco

	Printed Name	Address	Signature
289	Kelsey O'Leary	215 Shields St. SF	Kelsey O'Leary
290	Alcjusto + ERMINDUKIE	554 page st SF	ahlan ahlan
291	Robert J. Petermen	85 Bronson St	R
292	May Parker	8 Excelsior SF	May Parker
293	Albert Clifford Hudson III	331 Octavia Boulevard Apt 7	Albert H
294	Sandra Bunk	232 Carol St. ST, CA	S B
295	emily blenny	4440 rollingwood st SF CA	Emery Blenny
296	Pinkewi's	748 Page St. SF CA	CP
297	JOERG KOEHLER	4231 26th Street SF	J K
298	Liza Kramer	1940 Los Angeles Ave Berkeley CA	L K
299	ZACK CARA	2104 22ND ST SF	Zack
300	Sonya Yu	3604 22nd St. SF	Sonya Yu

From: [DCHall284@aol.com](mailto:DCHall284@aol.com)  
To: [Campus Planning - EIR](#)  
Subject: Sutro Forest  
Date: Tuesday, March 12, 2013 12:57:11 PM

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I completely support UCSF's plan for the care, thinning and evolution of the Forest to a healthier, safer and more diverse ecosystem.

Douglas C. Hall  
284 Frederick St.  
San Francisco, Ca. 94117

MARCH 13, 2013

RE : Mt. Sutro Management Plan DEIR

We trust that these comments are appropriate for the DEIR and support the management plan for Mt. Sutro.

From the perspective of landscape aesthetics, biodiversity and habitat conservation, public safety and recreational potential, we believe that active management is required for this key open space in San Francisco.

The predominant and non-indigenous Tasmanian Blue Gum eucalyptus forest, planted by Adolf Sutro over a century ago, is showing symptoms of decline and disease. These include such factors as ivy choked mature trees , densely spaced and unhealthy saplings , tree damage from 'snout nosed' beetles and an invasive ivy / blackberry clogged ground cover.

The lack of ' controlling ' factors , such as would be present in the eucalyptus' place of origin , and the heavy undergrowth dominated by a near mono culture of invasive (and still spreading in many areas ) Himalayan blackberry and ivies , contribute to produce an environment that is unfavorable for a sustainable forest and a biologically diverse understory and ground cover.

Our current perspective is that the aesthetics are suffering , the eucalyptus forest is subprime and a monoculture of relatively few invasive plants continues to dominate.

The up to date ecological ethos recognizes the importance of indigenous habitat to both conserve indigenous plant, animal and micro biota diversity and to offer support for seasonal migrating birds and insects.

We believe that the predominant eucalyptus forest can be sustained , featuring a more balanced biologically diverse understory that includes corridors and zones of indigenous non invasive vegetation.

This can be achieved by a combination of science based forestry management, and a comprehensive program of indigenous habitat conservation.

This would include such measures as thinning unhealthy and closely spaced eucalyptus saplings, reduction of the number of invasive black acacia, and judicious reduction of the various invasive ivies and Himalayan blackberry ground cover. Also included would be planting a variety of indigenous plant species along trail corridors and in such places as the expanded summit open space(s).

Public access to the restored recreational trails is an asset in this day and age of concern for public mental and physical health and we think that the indigenous plant corridors along trails could reduce the need for time consuming control of ivies and

RE : Mt. Sutro Management Plan DEIR p. 2

blackberry while at the same time provide hands on educational experiences for young people.

The fire danger expressed by authorities in view of the combination of fuel loading and converging factors such as drought, heat and wind in this Mediterranean type climate seems reasonable.

The propositions that Sutro Forest be left " as is " or to let " nature take its course " ignores the interventionist role of humans in the history of this place, undervalues the need to preserve our indigenous natural history and biodiversity, and compromises the potential for wise stewardship for public recreation.


Therefore, we citizens of San Francisco signed on March 12, 2013 , support the management plan subject to the DEIR to actively manage the Sutro Forest.


Robert C. Bakewell  
863 Arguello Blvd. # 5  
SF CA 94118  
<[rcbakewell@gmail.com](mailto:rcbakewell@gmail.com)>




Ted Hlavac  
87 Clarendon Ave

I hike in the open space  
daily and I appreciate what  
UC is doing.

  
Robert Wehman  
430 Burnett Ave. #14

Tim Jackson  
  
430 Burnett #14

Bryl Milour & Charles Hn  
  
128 Clarendon Ave

We have been worried about  
the fire hazard this area has  
been posed and we have contacted  
the City many times with very  
limited response. We much appreciate  
what UC is doing.

Laura and Gerald Robert  
83 Clarendon Avenue


We support UCSF's  
Stewardship plan

Deborah Schweizer  
21 Graystone Ter.

I support UCSF's  
Stewardship plan

Richard Morgese  
98 Clarendon Ave

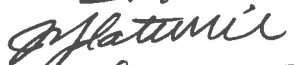

Support UCSF's  
plan

Charles Hsu  
  
128 Clarendon

I support the stated plan  
and would support a much  
more aggressive approach to the  
blackberries & non-indigenous flora.

JOANNE BAKER  
Joanne Balerice  
321 N. Willard St  
SF 94118

I support UCSF's  
managing the Sutro forest.

JoAnn & Matthew  
Zlatunich  
  
  
749 8TH AVE  
San Francisco, CA 94118

Nancy Larson  
925 Corbett Ave. #301  
S.F. CA 94131

March 13, 2013

①

Attention Liane Wong,

As a 36 year resident of Edgewood Avenue, and a 75 year old "native" San Franciscan, I strongly object to many aspects of the UCSF Mount Sinto Management Draft EIR.

I have witnessed first hand the results of tree cutting behind Edgewood Avenue and on the slope leading up to the Woods Parking lot. There has been a dramatic increase in both wind, fog, and noise.

Years ago the University planted some redwoods at the U.C. Edgewood border without any provision for irrigation or wind protection. The trees were stunted, and the tops died, and are only 15 feet tall 30 years after they were planted.

②.

In contrast to this ill fated attempt to plant natives, U.C. did manage to plant redwoods along medical center way where are thriving due to proper placement and care. (Redwoods are not native to Mount Satrio)

Now before approval of the EIR, U.C. has red painted trees south of Edgewood Avenue. Most of these trees appear to be dead or dying, but some must be left for bird habitat. Also there is a large swath of clear cutting and dead foliage off the historical trail below the junction of the Edgewood trail. The appearance of the dead undergrowth suggests herbicides rather than a fire.

If UCST continues with its ill conceived plans to drastically reduce the number

(3)

of "non native" trees and non native shrubs and to use pesticides there will be serious detrimental consequences for the surrounding neighbors and the entire city.

Noise, wind, and fog will increase, and the citizens of the city will lose a forest even if it is mostly non native.

I strongly urge UCSTF for both environmental, aesthetic, and financial reasons to withdraw its EIR for the Mount Sutro Forest Management. Instead use the limited financial resources and plentiful willing volunteers to preserve and protect the existing forest.

Sincerely yours,  
Joan Claire Cusick M.D.  
250 Edgewood Avenue  
San Francisco, Ca. 94117  
Past President Edgewood  
Neighborhood Association



From: [elsnerparl@aol.com](mailto:elsnerparl@aol.com)  
To: [Campus Planning - EIR](#)  
Subject: Fwd: Sutro Forest  
Date: Thursday, March 14, 2013 12:15:04 PM

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-----Original Message-----

From: elsnerparl <elsnerparl@aol.com>  
To: regentsoffice <regentsoffice@ucop.edu>  
Sent: Thu, Mar 14, 2013 12:13 pm  
Subject: Sutro Forest

Regents:

As a longtime resident of San Francisco I oppose this absurd proposal to cut down Sutro Forest. I remember that when Khrushhev visited San Francisco, his comment was "there are no trees". So true. And now it's proposed to cut down an urban forest much beloved by San Franciscans. What is the purpose? It's not clear.

DO NOT DESTROY SUTRO FOREST.

Nancy Elsner  
[Elsnerparl@aol.com](mailto:Elsnerparl@aol.com)

From: [janet kessler](#)  
To: [Campus Planning - EIR](#)  
Subject: EIR UCSF Mount Sutro --Comment from Janet Kessler  
Date: Thursday, March 14, 2013 1:09:10 PM

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UCSF Environmental Coordinator  
Diane Wong

**RE: Public Comment to the EIR UCSF Mount Sutro (#2010122041), by Janet Kessler**

Dear Diane Wong --

I am one of the people who loves the wild, thick forest as it now stands. So, preserving this very special forest, a unique gem in the center of the city, is a very emotional issue for me: I've lived here 35 years and it is in the wild thickets that I spend time every single day. It is a thriving forest -- an ecosystem which over the last 150 years has achieved a natural balance which is totally sustainable. Isn't that what we want? Sustainability. And, our tall, dense forest at Mount Sutro serves as a visual and noise barrier to other activities in the city. One can go there and feel magically transported to another place and time -- totally removed from all sense of human interference and from the intensity of urban life. What is so magical about this is that it is right -- plop -- in the middle of the city and takes no "driving time" to get to -- less pollution for everyone!

I take photos of the wildlife in the city: you may have seen my exhibit at the Main Library which ran for over a year: Urbanwildness. I continue to take wildlife photos and place them on my website: [www.Urbanwildness.com](http://www.Urbanwildness.com). So it is for myself and for the wildlife which now lives here that I would like the forest preserved. If you take away the dense protective habitat, where do you think the animals will go? They will migrate to neighborhoods where people don't want them. They will be considered vermin and they will be killed.

In addition to my concerns for wildlife, and my personal reasons for maintaining this magical forest as it is, I would like to address the fire hazard. The information I have has been meticulously researched: it points to increasing the fire hazard and deterioration of the forest if it is thinned and lopped down.

A lot of what I have been hearing from those who support removing and thinning the forest is misinformation, including that the fire on Angel Island was caused by Eucs. Could you please correct your information. Of course it is this kind of incorrect information which made me question other information which is being spread by nativists. I have found a good deal of their information to be incorrect and bogus.

1. The Eucalyptus forest on Angel Island did not burn in a huge fire -- the fire on October 12th was a fast moving brush fire. Angel Island had no fires until they felled all the Eucalyptus years before the October 12th fire -- and they've had a bunch of grassland fires since then.

Please note these dates to know the sequence of events:

<http://www.sfgate.com/news/article/Native-Plant-Expert-Defends-Angel-Island-Logging-3304044.php>  
<http://www.sfgate.com/bayarea/article/Stunning-Angel-Island-fire-seen-for-miles-3190251.php>

Although those promoting the "native plant programs" would have us believe that Eucalyptus are a fire hazard, the fact is that grasses and chaparral which are native to California are even more flammable - in fact, highly flammable. These plants have fibrous shreds on the bark which encourage fire and actually depend on periodic fires to sustain themselves.

2. The 1991 Oakland fire has been used by native plant advocates as a reason to get rid of all Eucalyptus. Contrary to their information, FEMA did a study which clearly states that these trees did not cause the fire, nor were they the primary fuel for that fire. That fire, too, started in dry grasses and

were bellowed by a hot wind which was funneled up through the canyons. It was not the trees which were the issue, but the configuration of the funneling effect of the canyon and the hot winds which were the issue. Two years ago the same sort of funneling of wind, and therefore flames, killed two firemen in San Francisco: the flames suddenly were funneled up the stairwell -- it had begun as a small low risk fire call. It was a house fire. In the Oakland fire, not only was the weather extremely hot that day, but that winter there had been an unusual freeze which killed parts of the trees leaving parts of them dead and dry. Here in San Francisco we don't experience these extremes of weather conditions with our cooler summers and warmer winters.

3. Fog blankets the city often and regularly. The water from fog condenses on the tall forest trees, causing a fog drip which results in the equivalent of 8 to 12 inches of precipitation a year. The forest on Mount Sutro is always damp. Forests hold moisture for a longer period of time than grasslands. To destroy the forest by thinning it will reduce the moisture and dry out the ground which then will become more susceptible to fires.

4. Another bit of misinformation is that the oil in Eucalyptus leaves is flammable. However, the National Park Services says the leaves are resistant to fire and have averted potentially catastrophic crown fires. It is the thickness of the leaves in addition to a waxy cuticle which makes them resistant to burning. It turns out that volatile oils in Eucalyptus leaves range from under 1.5 to over 3.5%, whereas California bay laurel trees -- native trees -- contain double that amount at 7.5%.

5. Eucalyptus trees in fire-prone locations may live only 100-200 years, however, those in a cool temperate climates live 400-500 years -- this latter is what we have here in San Francisco.

Reference: "*Eucalypt ecology*" by Jann Elizabeth Williams, John Woinarski (Cambridge University Press, 1997): "... it appears that individual stems of eucalypts can reach between 400-500 years in Southern Australia, whereas it has been suggested that individual stems in semi-arid and tropical Northern Australia only reach around 100-200 years." It goes on to say, "The combination of frequent fires, extensive piping by termites, and cyclonic activity in Northern Australia may contribute to the apparent difference in longevity between eucalypts in Southern and Northern Australia."

6. In a naturalized forest, you expect to find trees of every size and condition. All of our trees don't have to be the equivalent of Arnold Schwarzenegger. Trees of the same species, like people, vary in size, and bigger is not better. The smaller trees are as much part of the forest as the huge canopy trees. It's normal for trees to grow close together in a forest, with densities/ acre of 700 trees or more. They are all part of a community of trees, with the characteristics most appropriate to the terrain, wind, and water conditions of that particular spot. The root systems are intergrafted, and some of the small trees are actually clones of the some of the bigger ones. In any case, going from an average of 740 trees per acre to an average of 50 trees per acre is going to mean removing a lot of the big trees as well as smaller ones. Removing trees is going to result in \*more\* falling trees from windthrow, and from the intergrafted root system being weakened.

[Reference: *It has been suggested that another beneficial effect of intergrafting of the root systems of a pair or cluster of trees is the resulting **stabilization of individual trees against wind throw** (Loehle and Jones 1990). Basnet et al (1993) found that intergrafted trees of tabonuco (Dacryodes excelsa) underwent significantly less hurricane damage than isolated trees. -- Horticultural Review 35, Article by K. Mudge, J Janick, S Scofield and E.E. Goldschmidt.]*

7. A dense forest serves as a windbreak. The more wind coursing through a forest, the dryer it will be, and the more susceptible it will be to fires. The windbreak and denseness serve to keep the forest from drying out. Fewer trees would mean more of the winds would penetrate the forest and this would increase dryness. Interestingly, it has been found, in a study in Forest Science by Weatherspoon and Skinner of the USDA Forest Service that the least amount of damage due to fires is in the densest part of a forest.

8. There have been 3 fires we know of in Sutro Forest. One was in 1899, when it wasn't really a forest. The trees were at most 10-15 years old, and it was more open grass and shrubland. It was

described as a fire of the shrubs and grasses. The next was in the 1930s, which occurred after the forest had been opened up by logging. Ironically, this is what "thinning" the forest will do. There was also a small fire, put out in twenty minutes, at some uncertain date maybe 30 years ago (testimony from a Cole Valley neighbor). The fact that it was readily extinguished is the important part. Had the forest been "thinned" as planned, it might have grown much larger.

9. It's true there are some times when parts of Mount Sutro forest are very dry - and the \*places\* that are dry are where the canopy has been opened up and the understory thinned or removed. It's evident all over the mountain. Sometimes, it's dry as dust in the native garden - then steps away, inside the forest, there's mud.

*July 2012 Native meadow planting at summit of Sutro Forest was dry. It is in the fog belt (The green in back are non-native acacias). as are the Eucalyptus, but only the trees collect the moisture from the air and return it to the ground. As soon as you leave the native plant area and enter the forest, all is damp.*







*"The trail turned abruptly from dry to damp as we climbed into the forest."*

Dense forests are darker, thus discouraging the growth of flammable herbs and grasses.

Please see 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.

More information, every point of which should be considered before any work is done to alter our forest:

<http://milliontrees.me/2013/02/19/why-does-ucsf-want-to-destroy-the-sutro-forest/>

Please preserve the forest as it now stands. Drive down highway 280 if you want to experience the bare hills with a few oaks that serve as a "native" habitat -- there is plenty of that around -- it is not endangered. In the city, we have a unique vibrant forest which over time has developed into its own ecological niche with all sorts of plants and animals that thrive there. What a waste in terms of money and harm to the environment if you should remove even portions of it as it now stands. A lot of the wildlife would be displaced, and so would I.

Please, please let the forest stand as it now is.

Janet

From: [Jill Bittner](#)  
To: [Campus Planning - EIR](#)  
Subject: Save Sutro Forest  
Date: Friday, March 15, 2013 11:37:13 PM

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To Whom It May Concern or Coordinator Diane Wong,

I strongly oppose the felling of any trees in this forest. I have no doubt that UCSF is NOT doing this for the greater good of the citizens of SF or Sutro Forest but for greed and profit. Keep your hands off OUR forest!!!

Jill Bittner  
828 Bay St.  
SF, CA  
94109

**From:** [dolan eargle](#)  
**To:** [Campus Planning - EIR](#)  
**Subject:** Sutro Forest  
**Date:** Friday, March 15, 2013 11:54:05 AM

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Dear Ms. Wong.

I am speaking to you as a forester and as a long-time user of the Sutro Forest and former 25-yr. researcher at UCSF. I hope you have read the critique by the very knowledgeable foresters in the included statement:

<http://sutroforest.com/2013/03/15/flaws-in-ucsfs-sutro-deir-public-comments-due-19-march-2013/#respond>

We (as part of the protest movement about destroying SF forests) highly decry any acceptance of this extraordinarily destructive proposition.

Please, may we ask: "Do you have any background in forestry, or are you simply reading propositions put to you by some very destructive so-called" foresters"? Where does your support of this come from? What part of UCSF condones this serious action?

You must realize the extreme seriousness of this question. You heard the comments of dozens of persons who enjoy, use, and love this forest. Are you content as being known as a destroyer of beautiful natural places ?

What is being proposed is a major destruction of UCSF property by some divisive and gullible property "managers". They have already done a disservice to the City by talking the Glen Park Association into an incredibly destructive tree-removal and land remake in Glen Canyon Park. Earlier, they proposed. and have, for the moment, tried to wipe out much of the forest on Mt. Davidson. For the sake of the community, the University, and for the sake of common sense DO NOT HAVE ANYTHING TO DO WITH THIS BUNCH OF DESTRUCTIVE MONEYGRABBERS.

I, and my associates, will appreciate a somewhat detailed answer of these questions, ASAP.

Dolan H. Eargle, Jr.  
Dept., of Pharmaceutical Chemistry, UCSF (ret.)  
Former advisor attached to Louisiana-Pacific Lumber Co.  
Director, Trees Company, San Francisco



COMMENT FORM

Date: 3-15-12

Diane Wong  
UCSF Campus Planning  
654 Minnesota Street  
San Francisco, CA 94143-0286

Dear Ms. Wong:

I wish to make the following comment(s) regarding the Draft Environmental Impact Report (EIR) on the UCSF Mount Sutro Management project:

I want to voice my support for the option that minimizes the loss of trees. I believe an improved maintenance of the understory is the best emphasis. I would like to suggest that instead of machines, pesticides and goats that U.C. create a labour intensive process employing underprivileged & at risk high school youth.

Pay a minum wage = work  $\frac{1}{2}$  day clearing brush / replanting combined with a  $\frac{1}{2}$  day of career training & education in landscaping and/or health careers. This could be ongoing or part time to insure that many of our kids become involved with nature (who don't live in area)

I feel the fire threat & safety threat has been questioned by other sources. Why should the aesthetics be changed so much when so much can be done on the ground cover

Sincerely,

to make the most people in our community happy. I have lived

MARK GOULD

432 Belvedere Street  
SF CA 94117

here for over 35 years and I have seen what the lack of maintenance has done & what something like the stewardship program can do. Expand it!

From: [JULIE LONG](#)  
To: [Campus Planning - EIR](#)  
Subject: Opposed to deforestation of Sutro Forest  
Date: Friday, March 15, 2013 4:51:57 PM

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Dear Ms Wong,

I object to UCSF's high-handed and esthetically deprived plan of "management" of the forest, by cutting it down.

Also I totally object to the use of poison in the forest. Clearly, by using poison in the forest, UCSF is ensuring future business in its hospital, when the inevitable poison-related illnesses start up in the residents around UCSF. Nobody is fooled.

Your prompt reply is required.

Julie Long Gallegos  
Gaslight Original Beadwork  
[www.GaslightOriginalBeadwork.com](http://www.GaslightOriginalBeadwork.com)  
415-794-1204

March 15, 2013

To Whom It may Concern,

My Name is Nathalie Paven and I live at 1534B Shrader Street, a block away from Mt Sutro forest, where I have been a homowner for the last 20 years.

I am writing to urge you not to cut down the trees. The forest provides windbreak, habitat to multiple species of birds, insects and small animals, and transforms CO2 air pollution into oxygen. It also provides many hours of restorative contact with nature to those of us who walk in it. It is a unique jewel in the middle of the city. It is better than fine just the way it is.

At a time when all public institutions are experiencing major financial constraints there are surely more necessary projects on which to spend a significant amount of money.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read 'Nathalie Paven', with a long horizontal flourish extending to the right.

Nathalie Paven

From: [Lawrence Rosenfeld](#)  
To: [Campus Planning - EIR](#)  
Subject: Comment on the Draft EIR  
Date: Friday, March 15, 2013 3:53:27 PM

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Everything I have heard or read about this proposed project and the draft EIR is lacking in one important thing: actual scientific evidence of any of the claims on either side.

If that is not enough in and of itself to go back and re-think this entire process, then consider that well-meaning, intelligent people so disagree about the merits of the project that both leaving things as they are and proceeding with what seems to me to be EXTREME are bad ideas.

Lawrence Rosenfeld  
1236 6th Ave. #3  
San Francisco, CA 94122

Sutro Forest – UCSF management Plan  
Draft Suggestions part 3  
By Robert Scudder, 1199 Stanyan Street, SF 94117  
[rsscudder@pacbell.net](mailto:rsscudder@pacbell.net)  
415-317-5493 cell  
3-15-2013

Following are observations and suggestions are based on my follow-up hikes in and around the forest. You may use this as part of your DEIR response package if you think it will be helpful.

Although I have already submitted comments to be included in the DEIR for Mount Sutro, there is a lingering uneasiness. Were the thoughts shared (sufficient, cogent, complete, concise, intelligible) enough to mold your management plan in a way consistent with my perspective? Did I help you stand for the briefest of moments where I stand so that you begin to, as each of us hopes, that the reader/listener will embrace their point of view? It is not enough to say, “Cut the Tress, I want more sun,” “I’m afraid of them, cut them all down,” or “Don’t touch them, we need every tree,” and similar statements. What further issues and concepts can I share that will ease my mind and have a “positive” effect on the management decisions to be made over the next century? What then are the niggling things that I must scratch? Those that are currently turning my stomach into knars might best be exemplified in these key words and their extensions: absolutes, bias (in particular my own), chaos, carbon balance/credits, climate change, complacency, fear, “human obligation”, nature and a world of survivors.

Responding or developing each of these concepts is well beyond the time and space available. My approach, therefore, will be very narrow and reflect a snapshot view of my perspective and will of necessity be rife with omissions and may lead some to error in interpretation. Such is the risk that must be taken to communicate what I fell are pit falls we hopefully can minimize if not avoid in this process.

The best place to start is with some reflections on **bias**. Bias is not a negative, in fact it is essential to our daily lives, an integral part of our decision making process. It is not just an intellectual construct but an emotional one as well. Our biases are not ridged, rather they are evolving, some growing stronger, some weaker, while others appear to stay the same. These “filters” (biases) help us sort all the information pouring in upon us and helps us make quick decisions that are generally in keeping with our personality and beliefs. It is our security blanket, helping us feel safe and secure. On the down side, they can close our minds to new possibilities and makes us more likely to behave defensively when challenged. Opening our minds to other possibilities is not an easy chore. Here are some of my biases that relate to the management of Mount Sutro.

1. Living on the eastern side of the forest, I would like more winter sunlight. The sun marches behind the trees from November through March. Therefore, I tend to want the larger/taller trees removed.
2. Management strategies that are driven by “Absolutes” are often flawed and resource heavy. Managers need structure (goals to work toward), tools to implement strategies to achieve goals, and the freedom to apply them as they see fit within the long-term view.
3. Mangers should be allowed to manage, applying micro management at the point of action, not being micro-managed by supervisors or community groups. Once the global concepts and goals are established for the long-term, the manager should be turned loose to get the job done.
- 4.

Incomplete – my two minutes was up!

Sincerely,

Robert Scudder

Arborist and PCA # 074336

Note these are my personal comments on this project and do not represent official recommendations as an arborist or PCA.

[rsscudder@pacbell.net](mailto:rsscudder@pacbell.net)

415-317-5493 cell

415-753-8419 home

## **Sutro Forest Draft EIR comments**

### **Notes from my walk in the forest on Tuesday afternoon 3-12-2013**

1. Crossing Medical Way to access trails
  - a. Signage for Cars – “Trail Crossing – Slow Down”
  - b. Gaps in guardrail design, perhaps overlapping so that pedestrians can cross without stepping over the guardrail.
  - c. Map at the staircase and/or at Parnassus and Medical Way to direct users to the trails.
2. Did not see/notice signage for having dogs on leashes! Encountered 6-7 people with dogs – all courteous – all dogs but one were calm (it behaved like a puppy – jumping and exhibiting play behaviour, he was on a lead and well controlled by his owner/companion) – one pair of dogs were with two companions and were not on leashes.
3. Bike encounters 7
  - a. 6 going up and 1 going down
  - b. All courteous
  - c. Most gave warning of their approach
  - d. One going downhill got going quiet fast after passing me
  - e. Expected more bike related erosion than was apparent on the trails I walked – good maintenance?
  - f. To allow bikes to pass, it was often necessary to step off the path
4. Burms to divert water – Some trail managers have preferred to have water sheet off trails by having a “slight” slope to the downhill side to avoid more rapid erosion at burm sites or gullying along the uphill side.
5. Snags and Hags – Dead trees marked for removal – many could be left for nesting habitat if they were shortened to a height of 12-20’, small diameter tree less than 5” should probably be removed.
6. Other signage
  - a. Did not see signage to indicate proposed demonstration areas – would have helped in the visualization of the project.
7. Regeneration along the Historic Trail
  - a. Eucalyptus seemed to regenerate best on the South and Western exposures.

Robert Scudder  
[rsscudder@pacbell.net](mailto:rsscudder@pacbell.net)  
415-317-5493 cell





# San Francisco Nature Education



Nancy H. DeStefanis  
Executive Director

3450 Geary Blvd. Suite 208  
San Francisco, CA 94118  
nancyd@sfnature.org  
www.sfnature.org  
Office (415) 387-9160  
Fax (415) 387-9140

March 15, 2013

Dr. Susan Desmond-Hellman  
UCSF Chancellor  
513 Parnassus Avenue  
San Francisco, California 94143

RE: SUPPORT FOR UCSF RESTORATION PLAN FOR MOUNT SUTRO

Dear Chancellor Desmond-Hellman,

I am writing to you in support of the UCSF Environmental Restoration Plan for Mount Sutro. Our entire board has endorsed the restoration plan.

Our organization, San Francisco Nature Education, provides interactive environmental education programs that develop leadership and stewardship in youth and adults. Our school programs, Science and Nature for Underserved Youth, focus on providing educational enrichment to students from underserved communities. We use local parks as natural classrooms to observe local and migratory birds and to provide inspiring and engaging natural experiences

Here in San Francisco there are but a few remaining natural areas for the birds migrating along our Pacific Flyway that are suitable for their utilization. Though the present Eucalyptus trees on Mount Sutro do harbor a few of the migrants, we believe its lack of diversity and paucity of nutrients falls far short of what a mixed forest of native species would provide. Other environmental restoration projects in San Francisco, particularly those in the Presidio have resulted in greater numbers and wider diversity of avian populations.

Just last weekend members of our Birding Tour at Heron's Head Park spotted an endangered California Clapper Rail picking its way through native salt marsh plants reintroduced by the San Francisco Port Commission's Environmental Restoration Program. A future forest of native trees on Mount Sutro would very likely offer future students of

San Francisco  
Nature  
Education



Nancy H. DeStefanis  
Executive Director

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Ornithology similar opportunities.

Migratory Passerine species are in decline. Restoration and enhancement of suitable habitats, such as UCSF's plan for Mount Sutro, are the only hope we have toward reversing this mortal trend.

Congratulations for having the vision to undertake this worthwhile project. We endorse your efforts wholeheartedly.

Sincerely,

Nancy H. DeStefanis  
Executive Director

cc:

Ms. Diane Wong ✓  
UCSF Environmental Coordinator  
UCSF Campus Planning  
Box 0286  
San Francisco, California 94143-0286

California Board of Regents  
1111 Franklin Street, 12th Floor  
Oakland, California 94607

Page Two

From: [Wong, Diane C.](#)  
To: [Campus Planning - EIR](#)  
Subject: FW: Sutro Forest  
Date: Friday, March 15, 2013 8:57:42 AM

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From: Shuman, Marc  
Sent: Friday, March 15, 2013 7:49 AM  
To: Wong, Diane C.; Lew, Damon  
Cc: regentsoffice@ucop.edu  
Subject: FW: Sutro Forest

Dear Diane and Damon,

I am writing to express my deep concern about UCSF's plans for the Sutro Forest as a tenured UCSF Professor and neighbor- I joined the faculty in 1976- and lived in West Portal ever since then. The only reason it would make sense to devote our very limited monetary resources to implement the UCSF plan is if it would significantly reduce the risk of a dangerous fire in the forest. However, the majority of experts support the conclusion that cutting thousands of trees and clearing the underbrush will not decrease the fire danger. Evidence suggests that cutting the large number of trees that has been proposed and clearing the underbrush will dry out the area and create wind corridors. This will increase the fire danger. Most of the trees have more than a 100 year life span remaining. The other reasons cited for implementing the plan are a matter of preference and opinion and not deserving of our financial support. There are several other higher priority issues far more deserving of the funds that would be expended.

There are a host of additional reasons that UCSF should reject the current plan:

1. It is ecologically and socially important to preserve Sutro Forest as a unique cloud cover forest and wilder ecosystem.
2. It is unwise to use pesticides to clear underbrush. It is bad for the environment and will affect many other flora there. It will also adversely affect the ground water and thus have far reaching consequences.
3. Clearing the trees and underbrush will greatly increase the rate of erosion on the hills. Replanting will not develop new growth in time to abate this, especially if pesticides are used for several years. This is not the area to restore to native plant habitat.

Recall what happened to the Great Highway where non-native species were removed and replanted. Sand drifting was worse than ever. And that was on relatively flat terrain. Imagine what will happen on steep slopes.

4. With the proposed changes the forest will be:
  - a.) less able to absorb air pollutants
  - b.) less able to block winds that can dry out the vegetation and can spread fires more quickly

Sincerely,  
Marc A. Shuman, M.D.  
Professor of Medicine  
Division of Hematology - Oncology  
UCSF School of Medicine,  
UCSF - Helen Diller Family Comprehensive Cancer Center  
San Francisco, CA 94143-1270  
Home  
37 Claremont Blvd.  
SF, CA 94127

From: [Jacqueline Proctor](#)  
To: [Campus Planning - EIR](#)  
Subject: Mount Sutro EIR 1-16-13  
Date: Saturday, March 16, 2013 10:37:49 AM

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Dear UCSF Environmental Coordinator Diane Wong,

The Mount Sutro Open Space Cultural Landscape appendix completed for the Mount Sutro EIR confirms that this cultural landscape is an historic resource according to the CA Register of Historical Resources criteria. My book, *San Francisco's West of Twin Peaks*, is listed in the bibliography.

The standards for treatment of historical cultural resources such as this one require its preservation and replacement in kind for restoration. To comply with historic preservation laws, the management plan must be revised to include objectives and implementation measures for maintaining the character defining features of this historic forest through pruning, crown thinning and cleaning, cabling, and replanting of dead trees with the same species.

This would not be accomplished by the proposed project described in the Mount Sutro EIR. UCSF has a moral and legal obligation to pursue State historic landmark status for this significant historic forest landscape to fully honor and protect Adolph Sutro's generous legacy to the university. The vegetation management plan for the historic cultural landscape in the Presidio of San Francisco provides a better example for maintaining historic forests in this City than does the one proposed in the Mount Sutro EIR.

UCSF and the Sutro Stewards have managed this cultural resource so very well to date. It should continue as it has by adopting the NO Project alternative.

Jacqueline Proctor

579 Teresita Blvd.

San Francisco, CA 94127

From: [rosmari](#)  
To: [Campus Planning - EIR](#)  
Subject: Sutro Forest  
Date: Saturday, March 16, 2013 7:15:30 PM

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I am truly dismayed by UCSF efforts to drastically cull Sutro Forest. Perhaps there is the odd tree that is dying and needs to be removed; though on my many walks through the forest none has come to my attention.

Replacing the bulk of the forest by native plants is, in my mind, a Don Quixotic notion. Native plants are fine in Marin County, on the two Twin Peaks, Kite Hill, or other such currently unwooded areas. The Arboretum in Golden Gate Park has an area set aside for native plants, and I enjoy visiting it. But I would be sad and upset if the powers-that-be decided that all of Golden Gate Park had to be brought back to its original condition: essentially sand dunes with their appropriate "native" vegetation. And I am sad and upset that such an action is contemplated for Sutro Forest.

So, please, leave that one and only forested hill in the city of San Francisco in its current naturalized shape: Eucalyptuses (Eucalypti?), ivy, and whatever brush there is. All that wild vegetation is precisely what makes that forest so wonderful.

Also, cutting down much of the forest would materially affect the climate east of it. The forest, now, acts as a barrier for wind and fog.

Thank you.

Rose-Marie Ullman  
10 Pemberton Place  
San Francisco 94114  
Tel: 415-861-2297  
e-mail: [rosmari@operamail.com](mailto:rosmari@operamail.com)

From: [shirley.acuna](#)  
To: [Campus Planning - EIR](#)  
Subject: DEIR ERROR DRAFT  
Date: Monday, March 18, 2013 10:55:58 PM

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TO THOSE CONCERNED,

I AM A NATIVE RESIDENT, ONE OF THE MANY CITIZENS, CONCERNED WITH THE  
RAPID CHANGING LANDSCAPE OF THE CITY.  
THIS DEFORESTATION PLAN OF MOUNT SUTRO, IS MISLEADING, PROVIDES LITTLE  
TO NO CONCLUSIVE DATA, AND IF TAKEN IN TO EFFECT WOULD DESTROY  
THE NATURAL MICRO CLIMATE PATTERN OF THIS SELF SUSTAINING ECO SYSTEM.  
PLEASE CONSIDER A GENERATION BEYOND YOUR OWN  
YOU HOLD A HUGE RESPONSIBILITY, TO THE WELL BEING OF THE ENVIRONMENT  
AND THOSE RESIDING AND VISITING THIS VIBRANT CITY  
BUTTERFLY EFFECT  
THE LORAX  
REDUCE REUSE RECYCLE  
GET WITH THE PROGRAM  
GO GREEN  
KEEP THE MONEY SEPARATE FROM YOUR DECISION

YOUR CONSCIOUS  
WILL THANK YOU  
AS WELL AS THOSE MEMBERS OF THE SURROUNDING COMMUNITY  
WE KNOW  
WE LISTEN  
WE WANT CHANGE

NAMASTE

From: [kasey.asberry](mailto:kasey.asberry)  
To: [Campus Planning - EIR](#)  
Cc: [kasberry@demonstration-gardens.org](mailto:kasberry@demonstration-gardens.org)  
Subject: Mt Sutro DEIR response  
Date: Monday, March 18, 2013 1:49:01 PM  
Attachments: [PastedGraphic-2.tiff](#)

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Dear Ms Wong,

This letter addresses the Mt Sutro Draft Environmental Impact Report.  
[http://savesutro.files.wordpress.com/2013/01/mount\\_sutro\\_eir\\_1-16-13\\_with\\_appendices.pdf](http://savesutro.files.wordpress.com/2013/01/mount_sutro_eir_1-16-13_with_appendices.pdf)

The plan to fell trees in the Mt Sutro cloud forest is flawed in several ways that are significant to the well-being of one of the largest stands of trees in San Francisco and therefore has important implications for the City itself.

- 1) The DEIR assumes to mitigate a level of fire danger that according to CalTrans does not exist, felling trees as proposed and thinning understory will create a disturbed, drier landscape which will be more prone to dangerous fires.
- 2) The structure and function of this forest is misunderstood in the report; outcomes from the proposed tree and understory removal are misrepresented and understated.
- 3) The zealotry that motivates blind removal of all non-native species from California needs to be re-thought in light of the over-arching need to maintain mature forest ecosystems, especially in urban areas. Although eucalypts aren't California natives they are well-established in other parts of the Mediterranean Biome and for good reason - they are drought tolerant and contribute to moderation of local microclimates. This stand is one of our best local carbon sinks. As climate change effects become more full-blown we will be more and more grateful for any intact forests.
- 4) Resources that would be used to cut and thin in this forest should instead be devoted to maintenance and ongoing monitoring of this precious resource. How can we expand on it? How can we create more such robust stands?

Please employ your capacities as steward and halt the plan to log Mt Sutro Cloud Forest.

Sincerely,  
Kasey Asberry





Shih Yu-Lang Central YMCA  
387 Golden Gate Avenue, San Francisco, CA 94102

twitter: [@Cntrl Y Gardens](#)

Kasey Asberry

(415) 283-8570

Linked-In: <http://www.linkedin.com/pub/kasey-asberry/1/530/130>

From: [shannon.assad](#)  
To: [Campus Planning - EIR](#)  
Subject: Sutro Forest  
Date: Monday, March 18, 2013 8:47:31 AM

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Please do not allow the removal of any healthy trees from the Sutro Forest. It's a wonderful oasis from city life, right inside the city!! I am born and raised in San Francisco, and love our escapes within walking distance to the Sutro Forest, Glen Park Canyon, etc. My city is changing every day. There are more and more high rise condos to house wealthy dot commers while families are being pushed out. We do not want to see our wonderful Sutro Forest destroyed as well. Please don't allow this. Thank you! Shannon Assad

From: [Binta Ayofemi](#)  
To: [Campus Planning - EIR](#)  
Subject: Sutro Forest, Retain Moisture, Don't Dry Out  
Date: Monday, March 18, 2013 8:07:04 AM

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Dear Diane Fong,

As a concerned SF resident, I support a revision of the UCSF plan to revise Sutro Forest.

Drastically thinning out the eucalyptus trees will actually destabilize and dry out the forest ecology, making it more prone to the fires wished to be prevented. The special cool mist condition/forest ecology that keeps Sutro Forest moist and damp will be threatened, and less effective, with a drier, dustier condition created by thinning the trees and understory. Please reconsider your plan, and work more strategically and biodynamically with a team of foresters instead of one hired expert. Be innovative instead of merely strategic. We are counting on your leadership.

Binta Ayofemi  
Concerned Citizen, SF

From: [MBaxter](#)  
To: [Campus Planning - EIR](#)  
Subject: Do not cut the trees of Sutro Forest  
Date: Monday, March 18, 2013 9:39:17 PM

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Hello,

In following the planning of UCSF for management of Sutro Forest, it is very disturbing to see the direction of deforestation being followed in the guise of "management." The management practices of the past are no longer applicable in the current world and climate situation.

Leave this forest alone. It provides great health for the surrounding community, oxygen, and processing of carbon dioxide for its own survival, in other words, a perfect, natural, symbiotic system in the city of San Francisco.

Scientists on the cusp of new discoveries and information know and attest to the need to re-forest, not de-forest.

UCSF will shame itself for generations to come if it follows this low consciousness plan to destroy a beautiful natural habitat.

Mary Baxter

Everything is possible.

From: [Constance Bernstein](#)  
To: [Campus Planning - EIR](#)  
Subject: saving sutro forest  
Date: Monday, March 18, 2013 11:05:20 PM

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Sutro Forest is a part of my daily walk, so it is in my neighborhood and very much loved by all of us. Please simply leave it alone so that all of San Francisco can continue to enjoy its natural beauty and richness. Having a forest in the middle of The City is one of the wonders that makes S.F. the wonderful city it is. Don't mess S.F. up. Keep the forest intact, immortalizing its abundant and wild beauty.

Constance Bernstein  
[19 Divisadero Street](#)  
[San Francisco, CA 94117](#)  
[415 626 2210](#)

From: [Jim Billings](#)  
To: [Campus Planning - EIR](#)  
Subject: Re: UCSF's DEIR for Mount Sutro Open Space Reserve  
Date: Monday, March 18, 2013 12:44:49 PM

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Dear Ms. Wong,

I am opposed to the DEIR for the proposed thinning project. There are many errors in the DEIR. For instance, the mock-up photos do not accurately reflect the devastating result of the proposed project. There is a complete misunderstanding or deliberate misstatement of the facts regarding Eucalyptus trees! Some of these misstatements including the flammability of the trees. In addition, the canopy of the grove provides more moisture than what would be provided after the thinning process. There is also a mischaracterization of the micro-climate in the Mount Sutro area. This micro climate is very different than the other areas used for comparison in the DEIR. There are many more errors in the DEIR.

I urge you to recommend an independent review of the DEIR by an outside expert or have another party give you a new EIR, since your Urban Forest Ray Moritz and the other preparers obviously do not know the local environment nor do they know this type of forest nor the environment they are making their comparisons to.

For a number of years, I have studied ecology and the unintended effects of changing the current environment. This DEIR does not come close to studying the true effects of what will happen if this grove is drastically altered. The DEIR skims over the effects on birds, animals, mammals, insects, etc., as well as the vegetation. There will be many unpleasant environmental consequences to this project that the DEIR does not take into account.

Best Regards,

Jim Billings

Jim Billings  
390 Teddy Ave  
San Francisco, CA 94134  
415-913-0590

**From:** [Arnold Burgener](#)  
**To:** [Campus Planning - EIR](#)  
**Subject:** Opposed to Sutro Forest Tree Removal  
**Date:** Monday, March 18, 2013 1:33:45 PM

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Dear Ms. Wong,

I want to state my strong opposition to the proposed large-scale removal of trees in Sutro Forest. More knowledgeable and coherent voices have made the arguments, both pro and con. So let me simply say that I have spent pleasurable hours walking in Sutro Forest, and regardless of how others may view it, for me it is one of the treasures of San Francisco.

Am I overreacting? Well, for nearly 30 years, my favorite walking destination from my home in Bernal Heights has been Glen Park. Much of the appeal of Glen Park for me has always been the Eucalyptus trees. It is absolutely heartbreaking, after being away from San Francisco for four months, to see what has been done in the name of native plant restoration.

Sincerely,

Arnold Burgener

From: [Paul Castleman](#)  
To: [Campus Planning - EIR](#)  
Subject: Sutro Forest DEIR  
Date: Monday, March 18, 2013 2:20:14 PM

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Dear Diane Wong,

I know you have received many letters and comments opposing the plan to cut down so many trees in Sutro forest. You should know that behind each letter are many others who are distressed by one or more of the many environmental problems with the plan, including increased fire danger, use of toxic pesticides, loss of wildlife habitat, and contribution to global warming.

It seems redundant to repeat the many cogent, well-documented analyses that you have already received on the significant environmental harm of the proposed plan and on the serious errors, omissions, and misleading characterizations in the current EIR document.

Ten years ago, I was involved in a similar, although much smaller scale, controversy on Tank Hill, which is only a few blocks east of the Sutro Forest. When the city's Natural Areas Program ignored the overwhelming majority of the neighborhood's opposition, I personally met with Senator Barbara Boxer, who helped stop the tree-cutting. (We also had a *pro bono* attorney waiting in the wings if our political efforts had failed.) Many of these same neighborhood activists were also involved in the successful effort to scuttle the Sutro FEMA grant that UCSF spent considerable time and money preparing and defending before finally withdrawing the proposal after FEMA, repeating our arguments in a written letter to UCSF, rejected UCSF's claim that the plan would reduce the fire danger.

As I'm sure you know, the overwhelming majority of the Sutro neighbors and other users of Sutro Forest strongly oppose the current plan. I have met with, and also walked the forest with, Senator Leland Yee, who has the additional concern about how much money and other resources UCSF has already spent on this effort and how much more will be spent. As I'm also sure you know, Senator Yee has been a crusader in exposing and opposing UC expenditures that are not directed at the university's core mission of education and academic research.

There are several members of the opposition community who are ready to continue their fight for as long as it takes to achieve the kind of success we had on stopping both the Tank Hill tree-cutting and the UCSF FEMA grant.

Therefore, I ask that you consider withdrawing the current plan and negotiate in good faith with the community a new plan that avoids some of the most egregious risks to the environment of UCSF's current plan.

Thank you for your attention.

Paul Castleman



From: [carolyn\\_chamberlayne](#)  
To: [Campus Planning - EIR](#)  
Subject: Mount Sutro Forest  
Date: Monday, March 18, 2013 10:11:12 AM

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Dear Diane Wong,

I understand that there is thought of removing a large portion of Mount Sutro Forest. I hope this will be rethought.

I used to live quite close to the forest and went for enjoyable walks through it often as I know many people do. It is a wonderful habitat for abundant wildlife - mammals and birds have homes in this forest which a large destruction of a big portion of the forest would disturb greatly.

It is a safe zone for city dwelling fauna and flora.

It is also an area that provides needed green space for improved air quality in the city.

I have heard that there is fear of fire hazard linked to this forest. It is not like some forests in drier Bay Areas though. Having walked and driven through this area countless times I feel I should mention that this is a very damp area - damp on the ground, in the air, on branches and leaves, drops of water will frequently fall upon you while passing through this area - it's a famously cloud covered portion of SF - so it seems the fire hazard argument is a bit far fetched and more of a hopeful tactic aimed to convince people to agree with the tree cutting.

The spacing that the tree cutting proposal is promoting is far too great and empty. It is unnatural and it won't allow for the healthy plant and animal life that thrives there now and to boot it will not make the environment more aesthetically pleasing.

Please visit this currently wonderful place of respite and take a walk and rethink the thoughts that are being proposed.

Thank you,  
Sincerely,

Carolyn Chamberlayne

From: [cjcobb9@myastound.net](mailto:cjcobb9@myastound.net)  
To: [Campus Planning - EIR](#)  
Subject: Sutro Forest  
Date: Monday, March 18, 2013 10:48:30 AM

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Ms. Wong,

After reading UCSF's draft environmental impact report, I must protest your plan. The negative impacts are many in a city that has so little natural open space but the three most important ones follow:

The trees in Sutro Forest are healthy and thrive in the cool moist micro climate of San Francisco. It promotes fog drip and blocks wind. Thinning the forest and removing the understory will increase fire risk not decrease it as stated in the DEIR.

Implementing the plan will increase carbon in the atmosphere. This is irresponsible and bad for the environment.

The plan will destroy the ecosystem of the forest.

Why would UCSF waste money to implement such a misguided management plan. Please reconsider.

Regards, Cindy Cobb

**From:** [Jocelyn Cohen](#)  
**To:** [Campus Planning - EIR](#)  
**Subject:** oppose cutting of trees at UCSF Sutro Forest  
**Date:** Monday, March 18, 2013 6:14:22 PM

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Dear Committee,

Imagine the possibility cutting these trees is a bad idea? A cloud forest in the middle of an urban city being removed and forever altering our ecosystem and all the inhabitants from birds to invertebrates. I completely oppose the cutting of 30,000 trees and am appalled you are even considering it.

Jocelyn Cohen

Jocelyn Cohen  
Poetree Landscapes & Arboriculture  
Certified Arborist and Certified Aesthetic Pruner  
415-285-2342  
[jocelyn@jocelync.com](mailto:jocelyn@jocelync.com)  
Sent from my iPad.

From: [Catherine](#)  
To: [Campus Planning - EIR](#)  
Subject: plan to cut trees in Sutro Forest  
Date: Monday, March 18, 2013 10:36:21 PM

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Dear Diane Wong,

As someone who has enjoyed this beautiful area for many years, I am asking that UCSF does not cut down the trees in Sutro Forest. Considering fire danger from underbrush growth that will result from this action, and environmental factors like global warming, there is no justification for cutting trees. Native plants and trees are not necessarily better, and they will take a long time to grow. I have seen the same cutting in the Presidio, and the natural beauty of the forest is destroyed by it. And as far as native is better, well then, let's give the land back to the Native Americans...otherwise, it's not a good argument. I hope you will listen to all of us who are upset by this and leave the trees alone. Thanks.

Sincerely,

Catherine Edwards

From: [Patricia Everall](#)  
To: [Campus Planning - EIR](#)  
Subject: Save Mt Sutro Forest  
Date: Monday, March 18, 2013 1:37:26 PM

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Diane Wong:

At a time when mature trees with well-established ecosystems that can withstand drought, sequester carbon dioxide and shelter wildlife are so desperately needed, and also when money always seems to be in such short supply for maintenance, it is simply madness to destroy the Mt Sutro Forest in the process of trying to "fix" it. Please, oh please, review the information presented in the Save Mt Sutro "Flaws in UCSF'S Sutro DEIR . . ." and rethink this ill-conceived project.

Patricia Everall  
236 Amber Drive, San Francisco 94131

From: [Larry](#)  
To: [Campus Planning - EIR](#)  
Subject: Glen Park  
Date: Monday, March 18, 2013 9:46:31 AM

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In a time when budgets are being cut for essential services, the notion of spending money on removing thousands of trees in Glen Park appears just plain dumb. The eucalyptus trees there are not native, so they're being removed at great expense.

None of the trees in Golden Gate Park were there originally, but no one is saying that we must spend millions of dollars to return it to sand dunes.

Larry Faulks

From: [smff](#)  
To: [Campus Planning - EIR](#)  
Cc: [SF Forest](#)  
Subject: Sutro & Mt Davidson Forests  
Date: Monday, March 18, 2013 12:41:58 PM

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People,

What are you thinking?

Cut the diseased trees, yes!

LEAVE THE HEALTHY TREES ALONE !!!!

They are thriving.

We need them.

We don't have the funds for this.

Put the money into education.

Bring back school nurses, art, phys ed., home economics, etc., - put the money in our future.

This is another example of man's unnecessary interference.

MOTHER NATURE CAN TAKE CARE OF HERSELF.

Read what experts say:

<http://sutroforest.com/2013/03/15/flaws-in-ucsfs-sutro-deir-public-comments-due-19-march-2013>

Represent what the citizens of SF want.

Susan Fitzer  
Agua Way  
SF/94127

From: [Dave Fonseca](#)  
To: [Campus Planning - EIR](#)  
Subject: Save Mount Sutro Forest  
Date: Monday, March 18, 2013 6:05:13 PM

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Dear Diane Wong,

I'm sure many others have already pointed out the countless reasons to save Mt. Sutro Forest. I can only add my name to that list of people who feel strongly that this beautiful slice of paradise in our beautiful city should be protected and maintained.

Thank you,  
Dave Fonseca  
325 Warren Drive  
San Francisco, CA 94131



From: [Galin, Nikki](#)  
To: [Campus Planning - EIR](#); [Wong, Diane C.](#)  
Subject: sutro comment  
Date: Monday, March 18, 2013 1:27:57 PM

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Hi Diane. I wanted to make comment on the Sutro issue. As a university employee and resident of the neighborhood, I strongly oppose UC's proposal to alter Sutro open space preserve. I oppose the 'demonstration areas' and plans to thin/fell the trees or remove understory. I value Sutro as a dense forest and am not in favor of a more "park like setting", which we already have nearby in Golden Gate Park. The forest-like retreat Sutro provides was one of the selling points when I was buying my home in Cole Valley. Like so many others in the neighborhood, the forest as it currently stands improves my quality of life. It rejuvenates me before and after work, so that I can better serve our medical center patients.

Thank you for your consideration, Nikki Galin

Nikki Galin, LCSW  
Heart and Lung Transplant Social Worker  
UCSF Medical Center  
Phone 415-353-8818  
Pager 415-443-7722  
Fax 415-353-8638

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From: [ted garber](#)  
To: [Campus Planning - EIR](#)  
Subject: Do not cut MT Sutro  
Date: Monday, March 18, 2013 1:55:22 PM

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3/18/13

[EIR@planning.ucsf.edu](mailto:EIR@planning.ucsf.edu)

Ms. Wong:

I strenuously oppose the use of any money by the university to do anything other than education and research. Cutting of trees in a mature forest is not an activity that contributes to fulfilling the mission of the university. In fact, squandering of money on tree cutting removes money and resources that are better used supporting the university. I voted for proposition 30 to support education, not to support cutting of trees.

I am opposed to the deforestation proposed for Mt. Sutro Forest. The DEIR is not well executed with misstatements, misinterpretations, and omissions. Sutro Forest is a mature, healthy ecosystem that supports a healthy complex mix of plant and animal life, facts that are ignored by the DEIR. A competent and thorough environmental impact study has NOT been done to analyze the forest. The current DEIR conveniently ignores facts. The forest creates a wet environment from fog condensation that would be lost if the forest is cut or "thinned". "Thinning would lead to drier areas that are more prone to fire, perhaps leading to another great SF fire.

Mt. Sutro Forest is not a fire hazard. Cal Fire has labeled it a "moderate fire risk", their lowest risk assessment. Mt. Sutro would become a higher risk if it were thinned and the forest dried out. Many fires have occurred on Angel Island after Eucalyptus trees were removed.

The impact upon residents of the city is ignored. The forest provides a windbreak, soundbreak, and recreation to residents. The forest root systems stabilizes the hill.

I am opposed to the use of University money for deforestation projects on Mt. Sutro. I am opposed to thinning of trees on Mt Sutro. I am opposed to native plant reintroduction on government properties. It doesn't work without heavy, illegal pesticide use, and moreover, seems not to work at all.

Sincerely,

Ted Garber

895 Rockaway Beach Ave

Pacifica, CA 94044

From: [Leo Garza](#)  
To: [Campus Planning - EIR](#)  
Subject: Sutro Forest.  
Date: Monday, March 18, 2013 9:10:00 AM

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Diane Wong,

Hello my name is Leonard Garza. I live in San Francisco and enjoy the Sutro trails where I feel like I have escaped the city streets, cars and crowds. I have only recently started to use these trails and have found myself drawn to this place for quite dense forest feel. Please help us keep the little forest we have in San Francisco the same.

Thank you,

Leonard Garza

From: [Sally Gati](#)  
To: [Campus Planning - EIR](#)  
Subject: In support of the Sutro forest AS IS  
Date: Monday, March 18, 2013 2:14:10 PM

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Dear UCSF Environmental Coordinator Diane Wong,  
My name is SALLY GATI and I've lived at 74 Allston Way, within eye-view out my bedroom window of Mt. Davidson since 1975. I was never pleased with the cross, but I have always been so glad that the trail and the trees are as they are. I never get involved in any political or civic event, but this one really makes me mad. The idea that there is a plan to "redo" the area has upset me a lot. Thinning and pruning a forest is always a good idea, but the reasons given by the DEIR for cutting down so many trees is unconscionable. There is an alternative and workable plan. Why not consider what those from the SF Forests are advocating. Their plan is a realistic and much more acceptable solution. PLEASE don't cut down all those trees that have taken so long to make this forest a real forest.

Very sincerely,

SALLY GATI  
sallygati@sbcglobal.net  
(415) 681-0318

From: [apglk@comcast.net](mailto:apglk@comcast.net)  
To: [Campus Planning - EIR](#)  
Subject: Comment to Draft Environmental Impact Report UCSF Mount Sutro Management  
Date: Monday, March 18, 2013 1:17:14 AM

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To: UCSF Environmental Coordinator  
Diane Wong

From: Anastasia Glikshtern  
150 Chaves Ave.  
San Francisco, CA 94127

**RE: Public Comment to the Draft Environmental Impact Report UCSF Mount Sutro Management (#2010122041)**

Dear Ms.Wong,

The Mount Sutro is a thriving forest which over the last 150 years has achieved a totally sustainable natural balance.

The proposed project will disturb this balance and damage the environment by:

- Substantially increasing fire hazards reducing moisture and increasing wind in the forest;
- Subjecting the neighborhood to more wind by eliminating the windbreak provided by the forest;
- Subjecting the neighborhood to more noise by eliminating trees which provide the sound barrier;
- Increasing greenhouse gas emissions;
- Increasing air pollution;
- Destroying the habitat of the animals living in the forest;
- Subjecting people and wild life to the dangerous herbicides;
- Increasing erosion and introducing the risk of the landslides by destroying the roots of the trees which now stabilize the soil;
- Introducing dangers of wind throw to the remaining trees and therefore making them hazardous.

**The "No Project" alternative is the only acceptable option.**

The DEIR is long and **every** page of it contains numerous errors and misrepresentations.

I'm not a writer - only a concerned citizen. Because of my poor writing skills I'll only comment on some points in Fire Hazards (4.7) at this time.

- UCSF applied for FEMA grant to destroy the Mount Sutro eucalyptus forest and restore native chaparral based on it's claim that the eucalyptus forest is highly flammable. In FEMA letter of October 1, 2009 the claim of fire hazard was questioned and UCSF was asked to explain how fire hazard can be reduced by eliminating most of the existing forest - since reducing moisture on the forest floor by eliminating the tall trees that condense the fog from the air could increase the potential for ignition. Rather than answer this and other questions, UCSF withdrew its FEMA application. The FEMA environmental officer who evaluated UCSF grant application had informed UCSF that their project was not likely to reduce fire hazards on Mount Sutro and that fire hazards are minimal in San Francisco. The second fire hazard mitigation grant application by UCSF was to California Fire Safe Council in 2010. The Fire Safe Council had denied the UCSF application. So people in position to evaluate fire hazards do not believe that destroying the Mount Sutro forest will reduce the risk.

- The DEIR misrepresents a fire on Mount Sutro on October 8,1899 suggesting that it's an indicator of existing fire hazards and that 60 acres of Mount Sutro were destroyed by the 'great fire'.

But the terrain at the time was very different from what exists today. Tree planting only started in 1886. The trees, if they existed at all, were no more than 13 years old, with large expanses of open flammable grassland.

The San Francisco Chronicle said about the fire: "No serious damage was done,... except of the destruction of the undergrowth." It was "...water turned upon the flaming thickets".

This fire actually shows that chaparral that preceded the forest was more likely to burn than the trees. And that thinning the forest will increase the fire danger.

- There were other, small fires when the forest was being logged, including one in 1934 that ended the logging.

This indicates that the plan would try to recreate exactly the fire hazard existing when the forest was thinned: an open, drier forest, with easy access and a fuel burden of wood chips, logs, and stumps.

- The DEIR says that "at least three more recent fires in the Reserve have been documented and each was discovered quickly and extinguished". The fires were all man-made.

The proposed plan will increase the flammability and improve access to the forest therefore increasing the risk of man-made fires.

- Angel Island fire in October 2008 is misrepresented by DEIR. The Eucalyptus forest on Angel Island did not burn - it was a fast moving brush fire. Angel Island had no fires until 80 acres of eucalyptus were removed 15 years ago to restore 'native' grassland. Only 6 acres of eucalyptus remain. The fire that burned 400 out of 740 acres of Angel Island stopped at the forest edge. The vegetation that burned on Angel Island is precisely the vegetation that would follow the tree removal on Mount Sutro.

DEIR also ignores the difference in micro-climates: Angel Island is warmer and dryer than Mount Sutro.

- The DEIR cites 1991 Oakland Hills fire. This fire is used by native plant advocates to maintain the fiction that eucalyptus are highly flammable. There is no question that they were involved in that devastating fire - everything was - but they were neither the cause nor the primary fuel according to the FEMA technical report. The fire started in dry grass and leaped out of control when a spark reached nearby brush. There were factors in that fire not applicable to San Francisco. When it is hot in dry in the Oakland hills, it is cool and damp in San Francisco. the fog blankets the city, condenses on the tall forest trees, causing a drip equivalent to 8 to 12 inches of precipitation a year. The forest on Mount Sutro is always damp. There are no conditions on Mt. Sutro for fire ignition that exist in the Oakland hills. Thinning the forest, as proposed by DEIR, will reduce the moisture and dry out the ground which then will become more susceptible to fires.

- The wind plays essential role in California fires. In wind-driven fire the composition of the fuel load is irrelevant - everything in its path will burn. Windbreaks are one of the few defenses. In letter of October 1, 2009 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. The denser the forest, the less wind on the forest floor, the more shade on the forest floor, the less flammable vegetation on the forest floor, the more moist the forest floor. All these factors reduce fire hazard in dense forest. The proposed thinning of the Mount Sutro forest will **not** reduce the fire hazard but instead increase it dramatically.

- The DEIR states that '...at Angel Island, the fuel management activities that occurred prior to the 2008 wildfire were credited as having helped with fire-fighting efforts'. But there were no fires on Angel Island prior to these activities, and they were actually the cause of the fire.

- It's true there are some times when parts of Mount Sutro forest are very dry - but the only places that are dry are those where the canopy has been opened up and the understory thinned or removed. It's evident all over the mountain. Sometimes, it's dry as dust in the native garden - then steps away, inside the forest, there's mud.

- The DEIR states that 'in late summer and early fall there are hot, dry, high intensity winds... blowing in from the northeast'. There are no such winds in San Francisco.

Anastasia Glikshtern.

"

From: [Steve Golub](#)  
To: [Campus Planning - EIR](#)  
Subject: Fw: Comment on Mount Sutro DEIR  
Date: Monday, March 18, 2013 4:31:08 PM

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I am disgusted by the use of such flawed "science" to justify these planned changes to the Mount Sutro forest. There is not now, and has never been, good scientific data to justify this preference for "native" trees and vegetation as opposed to non-native imports to San Francisco such as the eucalyptus. Before the planting of eucalyptus, San Francisco had few, if any, trees. The landscape consisted of blowing sand dunes and sparse lessingia (a plant that to the average person looks like a weed). Because this nativist ideology has no legitimate scientific basis, and seeks to remove trees that the populace appreciates and enjoys, perpetrators of these plans are forced to resort to misleading photographs, exaggerations of risk, and frankly, outright lies in an attempt to make these plans appear reasonable and palatable to the public.

**The DEIR exaggerates the fire hazard – the management activity will increase—not decrease—the risk of fire.** The present microclimate of the Sutro forest is cool and moist, with predominately healthy trees. The forest promotes fog drip, and blocks wind. By thinning the forest and removing most of the understory vegetation, the management activity will open the canopy of the forest resulting in drier and hotter duff on the forest floor and a greater risk of fire. CALFIRE currently classifies the fire risk of this area at its lowest level of risk, which is moderate.

**Second, the management activity will increase carbon emissions to the atmosphere.** In the report, UCSF justifies these carbon emissions on the grounds that, after the cutting, more eucalyptus trees will grow to accumulate any lost carbon. UCSF is disingenuous on its views regarding eucalyptus: they first suggest that it is bad because it increases fire risk, and then suggest it is good because it grows quickly.

**Third, the management activity will damage the biological diversity and character of Mt. Sutro.** The forest on Mt. Sutro is, indeed, a novel ecosystem with many introduced species. Yet it is a diverse, functioning ecosystem providing many services, the most interesting of which is that it provides a small piece of wild nature in the heart of our city. The forest is old, but it may not yet be mature. There is no forest perfectly analogous to what exists on Mt. Sutro – a cosmopolitan mix of species, much like San Francisco. The fact that the forest is strange to us is not a sufficient justification for destroying it.

**Fourth, the management activity will increase the risk of Lyme disease and other vectorborne diseases in the urban environment.** On page 4.3-20 of the DEIR, it claims the forest is not a wildlife corridor because it's surrounded by urban development. In fact, if viewed from an animal's viewpoint, it is part of a system that connects to a broader area - Glen Canyon, Twin Peaks, Laguna Honda Reservoir, and Golden Gate Park. Although the report indicates only a squirrel was observed at Mount Sutro, the authors think the forest could house opossum, deer mice, raccoons, skunks – and black-tailed deer. The desire to bring additional species from outlying areas to this Mount Sutro location brings with it the risk of infectious diseases carried by the ticks that come with mammals. In urban areas where these "wildlife corridors" have already been established, we are seeing the introduction of ticks carrying Lyme disease and other afflictions into residential neighborhoods. I know--it has happened in my neighborhood.

**Fifth, the proposed changes will adversely affect species currently found in the Mount**



**Sutro forest.** For example, it is acknowledged in the DEIR that birds inhabiting this forest will be affected by the tree removal. The mitigation for the nesting of birds is absurd – they’re going to try to work outside the nesting season, and retain a few snags for woodpeckers. If they’re working between Dec 15 and August 15, they’ll call in a biologist to do a nest survey and cordon off nests. But the DEIR **ignores the effect of the reduced habitat for birds the following season**, which certainly is not “less than significant”.

Withdraw this management proposal—NOW!! Tell the Regents to concern themselves with REAL problems in the UC system.

From: [Aaron Goodman](#)  
To: [Campus Planning - EIR](#)  
Cc: [sfforestnews@gmail.com](mailto:sfforestnews@gmail.com)  
Subject: Save Mt Sutro's Tree's!!! - EIR comments  
Date: Monday, March 18, 2013 9:32:24 PM

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Please note that I am opposed to the destruction of the eucalyptus groves on Mt. Sutro.

I have seen to many trees removed in multiple areas of the city;

Parkmerced  
800 Brotherhood Way  
Glenn Park  
Junipero Serra Blvd.  
Golden Gate Park

and now proposed at UCSF.

There are better ways to manage the tree-canopy than clear-cutting areas.  
The maintenance should keep the canopy as is, and look at ways to properly remove hazardous trees by working with the SF Tree advocates who support proper and consistent maintenance and not removal for the NAP as being promoted by the Rec and Park.

I have spoken with maintenance workers who feel that the management does not listen to the workers in regards to maintenance and proper care, and it behooves you as the public reviewing body to look for alternatives that keep as much of the urban tree canopy as possible.

Too often trees are removed and not replaced (example: Parkmerced) and this consistently degenerates a community in the process. Parkmerced would and could look like St. Francis Woods in its landscape and in many cases and courtyards it till does look as mature in nature.

Think about what your doing in terms of not just the short and long terms of costs, but the environmental effects of clear-cutting the trees. Trees take longer to grow and mature and provide canopy, to cut the UCSF forest down is a sad error in judgement at an environmentally sensitive time in the world.

Sincerely

Aaron Goodman  
25 Lisbon St.  
SF, CA 94112

From: [Joy-Lily](#)  
To: [Campus Planning - EIR](#)  
Subject: Sutro forest plans  
Date: Monday, March 18, 2013 9:27:48 AM

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Dear Ms. Wong,

I am appalled that UCSF is planning to fell 30,000 trees in Sutro Forest. This is a bad idea for many reasons. Our planet is struggling to cleanse the air every day of the pollutants created by fossil fuels. Do you drive a car? If so, it puts a pound of carbon dioxide in the air for every mile you drive. A tree will clear 10,000 pounds of CO<sub>2</sub> from the air in its lifetime. These trees are the lungs of our city. Do not remove them. Problems with the forest's health can be managed in a sustainable way with some thought and planning, rather than with a chainsaw.

Thank you for your attention.

Martha Herman

From: [Douglas Hudson](#)  
To: [Campus Planning - EIR](#)  
Subject: Please don't cut down 30,000 trees!  
Date: Monday, March 18, 2013 8:27:54 PM

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I am writing to encourage further consideration of your deforestation plan of Mount Sutro Forest. When I heard about this, I was devastated to think of the impact that this will have.

30,000 trees!!! In San Francisco!?

Also, it is indicated that you will be using Garlon, a highly toxic chemical, to prevent regrowing of eucalyptus and woody understory plants. Are you serious!? This will be devastating for the land.

I hope that you have received numerous complaints regarding your proposed actions. I know that there is a huge outrage about this.

Thank you for reconsidering plans and making sure that you do the right thing.

Douglas

From: [ttt hhh](#)  
To: [Campus Planning - EIR](#)  
Subject: diane wong sutro forest  
Date: Monday, March 18, 2013 6:02:58 PM

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hi diane,

i just learned of this!  
this is insane.  
there are no native species left in sf!

there were shrubs, sand dunes.  
the settlers trashed what was left after they took everything from the ohlone indians.

all the eucalyptus trees, norfolk island pines, cook pines, monkey puzzle trees, orchids, etc, were the result of the boom in the shipping industry.  
these were brought back as gifts, species for study, and ornamentation.

to destroy the ecosystem that has evolved since the 1850s - hence, is what it is now.  
it cannot be reverted back.  
there are living beings in all of the micro-system.

murder.  
murder is the word that comes to mind.

also the pesticide issue -- major repercussions!

also, the land is owned illegally by ucsf.

jesus de noe's family was bilked out of it. they lost the lawsuit back in the day.  
however, adolph sutro owned much of the area, and planted these eucalyptus trees.  
this forest.

30, 000 trees is way beyond the realm of human sanctity , dignity and ethical, moral conscience.

this electronic submission of my brief opinion probably will not even count.

my family has lived in sf since the 1850s! and i am not allowed to have a voice in this?

i question:

how was this publicized? no person i know knows about it! and i know a lot of people!

let's talk legal action. ucsf regents are way out of line.  
who are these regents? who owns this parcel of land. a name, please, not a corporation.

tracey hughes  
453 dolores sf

From: [Viv](#)  
To: [Campus Planning - EIR](#)  
Subject: Sutro Forest  
Date: Monday, March 18, 2013 1:57:13 PM

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To Whom It May Concern:

Here I am, newly retired, and looking forward to walks in a beautiful forest and then there is this poorly-conceived plan to destroy it. Sutro Forest is more than a forest; it is an oasis for San Franciscans. There is no proper rationale for de-foresting this forest that is a gift of Nature.

Let it be.

Vivian Imperiale

**From:** [Maureen Kurpinsky](#)  
**To:** [Campus Planning - EIR](#)  
**Subject:** Sutro forest  
**Date:** Monday, March 18, 2013 9:10:22 AM

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I do not like the ucsf plan to "thin" the forest. The eucalyptus have been there a long time and should by now enjoy the same rights as natives. This philosophy also generated a similar felling of trees in glen park. Every morning waking up in the mission I lament "where are the trees"? I wish the custodians of our remaining forests would want to expand such preserves. If there is another reason for "thinning" besides returning to some bygone "native" period I would be interested to know. I am adamantly opposed to this destruction.

Maureen kurpinsky

Sent from my iPhone



From: [clayriver@earthlink.net](mailto:clayriver@earthlink.net)  
To: [Campus Planning - EIR](#)  
Subject: Sutro Forest  
Date: Monday, March 18, 2013 10:23:07 PM

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Dear Ms. Wong,

I was really saddened to learn that UCSF wants to cut down Sutro Forest. Although they are not native trees, the eucalyptus have become important habitat for a great many native species, particularly migrating butterflies.

But perhaps equally important, the Forest is a beloved part of San Francisco. It is a beautiful, quiet place to go for contemplative walks and to listen to the birds, to escape the man-made concrete and asphalt, to just sink into the solace of nature. These great tall trees that breathe gently in the wind, help to create a sense of perspective and make our human problems recede. If this forest is cut down, we will only see the hard edges of buildings. What a loss that would be!

Janet Lohr  
San Francisco resident  
66 Granada Ave.  
SF 94112

From: [DEBORAH LYONS](#)  
To: [Campus Planning - EIR](#)  
Subject: Mt Sutro Forest  
Date: Monday, March 18, 2013 7:43:44 PM

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I want to submit a public comment. I am opposed to cutting down live trees in the Sutro forest. Please just maintain it the way it is.

Deborah Lyons  
145 Guerrero #308  
SF CA 94103

From: [Melinda Burgener](#)  
To: [Campus Planning - EIR](#)  
Subject: Opposed to Sutro Forest Tree Removal  
Date: Monday, March 18, 2013 1:49:56 PM

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> Dear Ms. Wong,

>

> I want to state my strong opposition to the proposed large-scale removal of trees in Sutro Forest. More knowledgeable and coherent voices have made the arguments, both pro and con. So let me simply say that I have spent pleasurable hours walking in Sutro Forest, and regardless of how others may view it, for me it is one of the treasures of San Francisco.

>

> Am I overreacting? Well, for nearly 30 years, my favorite walking destination from my home in Bernal Heights has been Glen Park. Much of the appeal of Glen Park for me has always been the Eucalyptus trees. It is absolutely heartbreaking, after being away from San Francisco for four months, to see what has been done in the name of native plant restoration.

>

> Sincerely,

>

> Melinda Burgener

From: [Manning, John \(US\)](#)  
To: [Campus Planning - EIR](#)  
Cc: [Kristine Manning \(kristinemanning@yahoo.com\)](#); [Sean; Alexa Manning \(ammanning1@gmail.com\)](#); [fk94131@yahoo.com](#); [paul@belgravehouse.com](#); [paulcastleman@gmail.com](#); [mzinger1@comcast.net](#); [johnpmanning@yahoo.com](#); [Manning, John \(US\)](#)  
Subject: official comments on Mount Sutro EIR  
Date: Monday, March 18, 2013 10:55:13 AM

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My family has the following official comments in regards to the Mount Sutro Forest EIR:

- 1) The name "demonstration area" is materially misleading as it is approximately 20-25% of the entire forest. You need to re-name this.
- 2) Name the # of trees that will be cut down. It's not that complicated and you certainly have an estimate but it is inappropriate not to disclose the estimate. You say that the Save Sutro estimate of 27,000 trees is too high. Give the real #.
- 3) Wind in the Cole Valley neighborhood will be much higher the decreasing the value of homes there. You need to address this.
- 4) Pesticide use and its effects for the Woodland Creek which in rain storms runs through my back yard. Specify how many gallons of pesticides with go down this route.
- 5) Disclose the totality of your relationship with Sutro Stewards and Craig Dawson. Do you fund them? Do taxpayer dollars go to this group? They do a lot of good and thus have weight in the community but it appears they are on your payroll. Please disclose.

John Manning

On behalf of the Manning family (John, Kristine, Sean, Alexa)

118 Woodland Avenue, San Francisco

John Patrick Manning  
Managing Director  
Real Estate Investment Banking  
Jones Lang LaSalle  
One Front Street, Suite 1100  
San Francisco, CA 94111  
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[john.manning@am.jll.com](mailto:john.manning@am.jll.com)  
[www.us.joneslanglasalle.com/investmentbanking](http://www.us.joneslanglasalle.com/investmentbanking)

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From: [hushabye@earthlink.net](mailto:hushabye@earthlink.net)  
To: [Campus Planning - EIR](#)  
Subject: Plan to destroy Mount Sutro forest  
Date: Monday, March 18, 2013 8:24:28 PM

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Attention Diane Wong:

Why is UCSF supporting a plan to destroy a beautiful and peaceful 100-year-old forest? A forest that is home to many wild creatures-over 30 species of birds along with red-tailed hawks, which are a federally protected raptor.

NAP, with city approval and now UCSF approval is intent on destroying all the green parks, enjoyed by the citizens of San Francisco and leaving behind ugly and barren land because these parks and open spaces don't contain 'native' plants. I have seen the work of NAP over that last ten years and it is ugly. Go to some of these areas that have been turned back to native and you will see trees left to rot where they were felled, unsightly stumps and dirt.

Why on one-hand is San Francisco planting trees along the sidewalks and roads if non-native trees are a threat while allowing NAP to advise on cutting down already established forests? If this project is goes ahead I believe that our neighborhood will be subjected to

1. the threat of fire due to the loss of moisture on the ground from the loss of the natural cloud forest
2. the threat of damage to our homes because of the loss of a natural windbreak from the strong ocean winds
3. the deaths of who knows how many small animals, birds and insects because of the loss of their natural habitat
4. neighborhood exposure to pesticides being used to kill off all plants left on the forest floor-both native and non-for at least five years

There is already an established acre-and-one-half native garden at the top of Mount Sutro for anyone who is interested to visit. That should be enough. Please listen to the people of The City who enjoy and use the Mount Sutro Forest and leave it intact.

Sincerely yours,  
Patricia Mattox  
505 Oak Park Drive  
San Francisco CA 94131  
415-731-8234

From: [Nancy McNally](#)  
To: [Campus Planning - EIR](#)  
Subject: Sutro Forest comment letter 3.18.13  
Date: Monday, March 18, 2013 7:09:25 PM

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To : UCSF Environmental Coordinator Diane Wong  
EIR@planning.ucsf.edu

Greetings Ms. Wong,

As an institution of higher learning UCSF needs to heed the facts about Sutro Forest, not the forestry equivalent of urban legends about eucalyptus. FEMA rejected UCSF's earlier fire threat claim. - somebody from UCSF senior management needs to put someone rational and unbiased in charge of stewardship of the forest. The proposed removal of all those trees is an environmental blunder and could actually create a real fire hazard.

UCSF's proposal does not make sense environmentally or socially. Why destroy such a treasure? I can only think there must be some hidden agenda for building and expansion that would grossly disfigure a beautiful area and cherished landmark.

A physician's primary objective is " To do good, or do no harm" . UCSF needs to adhere to those objectives.

It would be criminal to decimate Sutro Forest... It is something we can never bring back. No amount of building can compare with the pleasure of city children and families being able to breathe, and stroll, and rest amidst the bustle of the city.

This cannot be allowed to happen. Sutro Forest is part of history of the City. The ecological damage will be enormous. Don't destroy something so beautiful and rare as a forest inside a metropolitan city.

Kind regards,

Nancy McNally  
Native San Franciscan.  
Founder, National AIDS Memorial Grove in Golden Gate Park

1640 Kirkham St # 17  
San Francisco, CA 94122  
tele 415-242-3414

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From: [MARK MILES](#)  
To: [Campus Planning - EIR](#)  
Subject: UCSF Sutro Environmental Impact report  
Date: Monday, March 18, 2013 3:11:05 PM

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Dear Ms. Wong,

I am writing to express my concerns regarding the plans for deforestation at the Mount Sutro Open Space Reserve. Your mock up photos show the trees with 8 to 10 foot spacing, whereas your actual proposal is for them to be from 30 to 60 feet apart! There also appears to be a greatly exaggerated statement as to fire risk, which CALFIRE gives only a "moderate" rating. Please take a moment to review the following: <http://sutroforest.com/2013/03/15/flaws-in-ucsf-sutro-deir-public-comments-due-19-march-2013/>.

Thank you for your attention to this disturbing matter.

Sincerely,  
Mark Miles



From: [Michele Nihipali](#)  
To: [Campus Planning - EIR](#)  
Subject: Sutro Forest  
Date: Monday, March 18, 2013 1:21:14 PM

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Dear Ms. Wong:

As a native San Franciscan I am deeply concerned over UCSF's plan to cut down and destroy much of Sutro Forest. Outside experts have provided testimony that refutes all of the claims for UCSF's plan to deforest. Please don't spend money foolishly on a plan that clearly will not benefit anyone, especially Sutro Forest. The community is against this and has proven beyond a doubt that UCSF's proposal is unfounded.

Thank you,  
Michele Nihipali  
54-074 A Kam Hwy  
Hauula, HI 96717

**From:** [jandjoda@aol.com](mailto:jandjoda@aol.com)  
**To:** [Campus Planning - EIR](#)  
**Subject:** Save the trees  
**Date:** Monday, March 18, 2013 9:48:17 PM

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Sent from my iPad please save the trees on mount sutro. Thank you, john oda

From: [MikePavitt@aol.com](mailto:MikePavitt@aol.com)  
To: [Campus Planning - EIR](#)  
Subject: EIR  
Date: Monday, March 18, 2013 9:34:21 AM

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Please do not follow through on your ill-advised plan to devastate the Sutro Forest. Based upon a faddish and silly movement for the replacement of "non-native" species, it is wrong-headed, and it will result in the destruction of a precious natural resource. If 150 years of adding value to the environment of the city is not enough to allow for the "naturalization" of the eucalyptus tree, then no one and nothing that is now part of this city is native and should be replaced. You have only to look at what has been done in Glen Canyon to see the evidence that your plan is an ecological disaster. If anyone can explain the inherent value and superiority of the native species that inhabited the area prior to Mr. Sutro's improvements, I'd hold less strong, but still serious doubts about the advisability of your plan.

Get a grip UCSF! You and your "experts" do not know nearly enough about forest management to justify acting upon this plan. It's a plan that is as full of holes as the Sutro Forest will be if you proceed.

Thank you,

Michael F. Pavitt  
1542 34th Avenue  
San Francisco, CA 94122  
415-664-5400  
Volunteer guide with San Francisco City Guides

From: [Jane Risk](#)  
To: [Campus Planning - EIR](#)  
Subject: Draft Environmental Impact Report for UCSF Mount Sutro Management Project  
Date: Monday, March 18, 2013 10:35:46 AM

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March 12, 2013

Diane Wong, Environmental Coordinator  
UCSF Campus Planning  
PO Box 0286  
San Francisco, CA 94143-0286

Re: Draft Environmental Impact Report for UCSF Mount Sutro Management Project

Dear Ms. Wong:

The Draft Environmental Impact Report (DEIR) for UCSF Mount Sutro Management Project describes a plan for the Sutro Forest that would completely change the character of this magnificent treasure in the heart of San Francisco. My objections to the DEIR begin with the stated project objectives, and continue throughout the body of the document:

Chapter 2.9:  
Project Objective – To Maintain a Forested Setting

I contend that if the UCSF plan goes into effect, Sutro Forest will no longer be a forest. As defined in Webster's dictionary, a forest is "a large thick growth of trees and underbrush." According to the objectives listed on page 44 of the DEIR, the UCSF proposed project would convert this vibrant forest into a sterile "forested setting". Trees on 75% of the Reserve would be spaced from 30 to 60 feet apart, with a mowed, grazed and poisoned understory beneath. The photos on page 75 and 76 of the DEIR do depict woods with a dead understory but they do not show the trees spaced 30 feet apart. A photo of the trees in front of Balboa Swimming Pool does (photo sent separately). Trees spaced this far apart would not even qualify as a "forested setting".

Particularly disturbing is the description (page 51 of the DEIR) of plans for Demonstration Area #4:

Trees:

- \* Removal of dead and unhealthy trees
- \* Tree thinning of remaining trees to average spacing of about 60 feet between trunks
- \* Tree stump treatment and sprout control would depend on outcome of Demonstration Project 1, but for purposes of this analysis, it is assumed that herbicides, perceived by some community members as being the most impactful, would be used
- \* Planting of native shrubs and trees (1 acre irrigated, 1 acre non-irrigated)

Understory:

- \* Initially, mow up to 90-100% (excluding native plants; including poison oak along trails)
- \* Large areas of underbrush are expected to be maintained in this demonstration area

Demonstration Area #4 is located in the heart of the Suto Forest, at the juncture of several popular hiking trails. The prescribed plans for this Demonstration Area will devastate these crucial two acres of the forest, and turn it into a barren hillside with an occasional tree struggling to survive, much as is shown in a photo of a logged hillside in the Interior Greenbelt section of the Forest which I am sending in a separate email.

Project Objective - To enhance view corridors from the Reserve

There are already plenty of other hillsides in San Francisco that offer fabulous views of the city, the bay and the ocean: Twin Peaks, Tank Hill, the open side of Mt. Davidson, Bernal Heights... to name a few. Suto Forest offers a different experience -- a chance to leave the noisy city behind, to walk in a secluded beautiful setting amidst the sounds of birdsong, to take deep breaths of the fresh moist forest air. To "enhance view corridors" is actually a pretext for cutting down the trees.

Project Objective - To monitor and sustain the health of the forest

The entire DEIR is postulated on the assumption that Suto Forest is unhealthy and its health will continue to deteriorate. (p. 183 - HortScience, 1999 report) This assumption is contradicted by a 2010 forest evaluation done by Certified Arborists Alma Hecht and Jocelyn Cohen. They concluded that Suto Forest is a "thriving forest with trees well-rooted along hillsides and flat areas... Tree girths range from wide in oldest trees to narrow where the trees are younger, more closely spaced and/or receiving less sunlight." Their recorded notes mention: "Thriving mosses and lichens on rocks and tree-trunks. Epiphytes colonized in branch crotches. Snags (i.e. standing dead trees) were left in place—perhaps by happenstance — providing habitat for wildlife." They continue: "It has the characteristics of a fog or cloud forest. As is typical in [such] forests, trees are crowded. Branching is high. Understory is deep. Leaves drip. Some trees are mature and mighty with crowns beyond view. Others are rangy, young and low enough to meet eye-levels."

They concluded: "The forest appeared healthy, and we saw signs of regeneration in forest trees including eucalyptus. UCSF has suggested that the forest is dying and infested with beetles. Since it's a living eco-system, a normal amount of insect life can be expected. But there's no evidence of unhealthy levels of infestation, or of a moribund woodland. In particular, the eucalyptus snout beetle, mentioned as a threat to the forest, is not known to be present in San Francisco, being more a pest of Southern California eucalypts. And even there, it's been well-contained with the introduction of a parasitic wasp."

"Trees in a forest – especially a dense cloud forest – tend to grow high and fast to reach the canopy, and do little branching until they get into the light. This results in trees that appear spindly and tufted, but in fact are healthy and well adapted to the place in which they are growing. A wet environment like Mount Suto Cloud Forest can sustain a very high density of trees and vegetation."

"In any case, natural forests -and naturalized forests, like these- will "self-thin" – the trees that are unable to get enough nutrients or light will eventually die. When this happens, it is the weakest trees that eliminate themselves, and the strongest trees that remain. This results in a forest that is best adapted to the conditions in which it

grows. Artificial tree removals for arbitrary spacing destroys the forest's adaptive mechanism. Removing existing trees in these forests will not improve the forest's health. In fact it will send the forest into decline destroying a healthy environmental treasure."

"We think the different opinions stem from a fundamental misunderstanding of tree forms in natural, or naturalized, forests. Here criteria for gardens or timber plantations where the objective is to optimize individual trees for aesthetics or lumber is inapplicable. In either of these naturalized forests the trees comprise a whole entity, wherein some trees might flourish, others might die, but are essential to the living whole."

Chapter 4 of the DEIR contains many deficiencies and inaccuracies:

\* 4.2 Air Quality: Section 4.2 of the DEIR considers only emissions from construction equipment that would be used during the project. According to a US Forest Service survey of San Francisco's urban forest, trees and shrubs in San Francisco remove 260 tons of pollutants from the air every year. "Trees remove about 19 % more air pollution than shrubs." The DEIR does not take into consideration the increased air pollution that would result from tree and understory removal.

\* 4.3 Biological Resources: Sutro Forest is very wet throughout the summer because the eucalyptus trees harvest the fog. Besides the magnificent eucalyptus trees, Sutro Forest supports a rich biodiversity of plant life: Blackwood acacia, blackberry, ivies, ferns, plum trees, pacific reed grass, holly, pine, grasses, and a number of other shade-loving plants and trees. By contrast, native plant areas turn dry and brown - and prone to fire - during the late summer months.

The DEIR does not mention that the Eucalyptus tree is particularly valuable as bee pasture. Eucalyptus has tens of thousands of nectar-filled blossoms per tree. It blooms throughout California from late January through mid-May, ensuring an abundant supply of nectar for hives at the time of their most critical need. Cut down all these Eucalyptus trees and the fate of thousands of hives of bees, and thus the continued pollination of our gardens and our food crops, may be in serious jeopardy.

Section 4.3 of the DEIR incorrectly assumes that native birds and insects require native plants. "The tree-thinning and vegetation removal is intended to provide a benefit to biological resources... Implementing the proposed project is expected to be beneficial and would increase the amount and variety of wildlife habitat, would improve habitat connectivity and biodiversity." On the contrary, cutting down more than 27,000 trees and removing 90% of the understory on three-fourths of the Reserve will drastically reduce the bird and insect population. Moreover, covering the ground with wood-chip mulch and spraying the vegetation with herbicides to prevent the regeneration of the understory will dramatically reduce bird and insect populations and decrease biodiversity.

\* 4.5 Geology and Soils: Section 4.5 of the DEIR makes the false assumption that "Post-thinning, the roots of adjacent undisturbed eucalyptus trees would spread laterally in the shallow soil, replacing the soil stabilizing characteristics of the decaying root systems of the trees that are removed." Over the course of 120 years, the root systems of eucalyptus trees have become intertwined. Thus the cutting

of large numbers of trees will almost certainly spell the death of those few trees, spaced 30 to 60 feet apart, that are allowed to remain.

According to the DEIR, "tree thinning activities would not occur on steep slopes." However, Section 4.5.2 also acknowledges that "60% of the Reserve has slopes in excess of 30%." Since UCSF has plans to remove 60% of the trees on 75% of the forest, it's obvious that much of that tree removal will take place on steeply sloping land, thus increasing the likelihood of erosion and landslides.

\* 4.6 Greenhouse Gas Emissions: According to Section 4.6 of the DEIR, "UCSF is committed to reduce its GHG (Greenhouse Gas) emissions from all of its operations to the 1990 level by 2020, with the eventual goal of achieving carbon neutrality for the campus." In direct contradiction to this commitment, the DEIR admits that "The GHG impacts of the proposed project, as described above are the short-term reduction of 11,286 tons of CO<sub>2</sub>e (10,239 metric tons) of the Reserve's above-ground carbon sink (from tree felling) and an increase of 5.7 metric tons of CO<sub>2</sub>e (from construction equipment) during the implementation of the project."

The plan also proposes to destroy 90% of the understory on 75% of the Reserve and prevent its regeneration by the use of goat grazing, herbicides and covering the forest floor with mulch. (In fact the chipped wood mulch is itself a source of released carbon.) Yet the DEIR includes "the increased probability for understory tree recruitment" as one major factor that "would be expected to offset much or all of the short-term carbon loss."

Section 4.6.6 asks us to consider "the longterm scenario" and concludes with the dubious statement that "the level of reduction of GHG sequestration that would occur under the proposed vegetation management activities is considered less than significant." Climate change is happening NOW, at an ever-increasing rate. We do not have 30 years to wait in order to find out if this wholesale destruction of the forest has had an adverse or a neutral effect on carbon sequestration and GHG emissions.

The DEIR claims that "No other similar large vegetation removal projects in San Francisco were identified." The truth is that currently there are a significant number of tree-cutting programs being considered in the Bay Area:

- \* The San Francisco Recreation and Parks Department plans to destroy 18,000 trees under their Significant Natural Areas Management Plan (SNRAMP)

- \* UC Berkeley is soliciting funds from FEMA to cut 80,000 healthy, mature trees in Strawberry and Claremont Canyons.

- \* The East Bay Regional Park District (EBRPD) and the City of Oakland have proposed tree-cutting projects that would potentially remove one million trees from the hills.

Each one of these plans has the potential to greatly decrease the amount of carbon sequestration, increase the release of greenhouse gases, and contribute to the "rise in the average global tropospheric temperature" known as global warming.

\* Chapter 4.7 Hazards – Fire Hazards

Chapter 4.7 postulates that “reduction in fuel load and improved forest health” will lessen the fire hazard with the Sutro Forest. Unfortunately this may not be true.

The fact is that the forest is not as flammable as the native San Francisco landscape of prairie scrub and grassland. Within the forest the tall trees capture the moisture from fog and clouds. That moisture rains down into the forest. The duff holds the water like a sponge. The dense undergrowth slows evaporation. The crowded canopy of trees keeps it shady and damp.

The thinning of Sutro forest will make it drier and windier, and the scrub and weed that will substitute the ferns and blackberry will be more flammable. The felled trees will be chipped and the dry logs and chips left in the forest – increasing the fuel load.

According to the DEIR, “eucalyptus are considered more hazardous because their oils are conducive to fire ignition, their curly strips of lightweight bark and leaves can carry sparks considerable distances (i.e. miles), and they create excessive debris (i.e. fuel load) on the forest floor.”

This statement is contradicted by David Maloney, chief of fire prevention at the Oakland Army Base. Chief Maloney was appointed to the Oakland-Berkeley Mayors’ Firestorm Task Force to investigate the causes of the 1991 Hills Fire. He contradicts the often-cited opinion that the eucalyptus trees were responsible for spreading the fire. In his words: “The characteristics that determine the fire resistance of any tree are how high from the ground its branches begin and the thickness of the tree’s bark. The blue gum has a very thick bark, enabling it to withstand fire, and its branches begin about 25 feet from the ground, — a ground fire will blow past it without catching its leaves on fire.

According to the DEIR (p. 202), “At Angel Island, the fuel management activities that occurred prior to the 2008 wildfire were credited as having helped with fire-fighting efforts. In addition, there is no evidence that these prior fuel management activities contributed to the cause or extent of the wildfire.”

David Maloney disagrees: “ In the late 1990s the federal government clear-cut blue gum eucalyptus from Angel Island. The eucalyptus canopies that provided shaded avenues for countless hikers and bikers were replaced by grass, brush and shrubs. In 2008 the worst fire in modern Angel Island history occurred, and consumed 400 of the island’s 740 acres. It burned much of the grass, brush and shrubs that had taken the place of the clear-cut eucalyptus. Blue gum eucalyptus is a dominate species. It precludes grass, brush and shrubs from growing around it. If the blue gum eucalyptus had not been cut down, the grass, brush and shrubs could not have survived, and the fire would not have been as extensive as it was.” The grass burned – and the burn stopped at the line of remaining trees.” A grass fire on Angel Island was relatively risk-free; one in the midst of housing and hospitals would be a crisis.

The truth is that native plant areas such as Rotary Meadows and forested areas where the trees have been thinned are much more conducive to fire than the untouched forest. According to the 2010 report by arborists Alma Hecht and Jocelyn Cohen: “When the thick carpet of forest duff is pushed aside, the soil is very moist to several inches down. Yet, in places where paths have been expanded,



the ecotope is becoming drier and dustier. In many areas, climbing vines have been cut, generally at five-ten feet, left dry and dangling from branches in thick nets... As would be expected in a cloud forest, we saw it was drying out where it had been opened up. In some areas with indiscriminate thinning and removal of trees, the ground is dry (compared with wet conditions through most of the forest and even on the same trail). Those areas also seem to have higher wind velocities. Dry conditions are particularly noticeable at the Rotary Meadow where an existing clearing was replanted into a landscape of native plants. Significant differences in moisture conditions are visible."

The DEIR acknowledges that "proposed forest thinning activities have the potential to increase wind speeds in adjacent neighborhoods", but assures us that "the effect would be very limited and not significant" (see Section 4.11.5) This is extremely hard, if not impossible, to believe.

#### Chapter 4.8 Hazards – Herbicide Use

UCSF and the Sutro Stewards should take pride in the fine job they have done over the years to create a healthy, thriving forest without the use of herbicides. We ask that they continue this commitment and set an example for others, including the management staff of the Natural Areas Program, that the forest and the native plant area can be managed effectively without the use of herbicides.

#### Chapter 4.11 Wind

The DEIR includes extensive evidence that wind speed and windthrow of trees will be increased if the tree density is reduced:

"The Mount Sutro Open Space Reserve weather station data suggests that, all else held constant, tree density can play an important role in determining wind speed and direction. Dataset 1 demonstrated a 4-fold difference in highest gust wind speed in a sparse forest compared to a neighboring dense forest." (p. 284)

"Thinning of trees would allow increased wind penetration into the Reserve, which could expose trees once protected by neighboring trees to greater wind speeds and an increased risk of windthrow. The potential for tree thinning activities to result in adverse windthrow risks would be greater in areas with other abiotic or biotic windthrow risk factors (e.g., steep topography)." (p. 286)

Blue-gum eucalyptus is one of very few trees that can thrive on the windy slopes of Mount Sutro. The DEIR mentions a related study of wind effects on trees in the Presidio: "The relative risk of windthrow for the dominant species in the Presidio was Monterey cypress (*Cupressus macrocarpa*), Monterey pine (*Pinus radiata*), then, most robust, blue-gum eucalyptus (*Eucalyptus globulus*)." (p. 277)

Then the DEIR erroneously concludes that: "The proposed management actions may lead to a conversion in species composition (e.g. through planting) that adds species that are more robust (e.g. coast live oak, bay laurel) ... to windthrow." In actuality, both coast live oak and bay laurel do not tolerate windy conditions. (Sources: University of California's "California Tree Failure Report Program; US Forest Service tree database.)

John McLaren planted mostly blue gum eucalyptus, Monterey pine and Monterey cypress on San Francisco's windswept sand dunes in order to establish Golden Gate Park... and Adolph Sutro had the foresight to

plant blue-gum eucalyptus on the windy hills of his Rancho. In both places the eucalyptus trees, planted more than 100 years ago, have survived and are thriving.

Missing from the DEIR

No place in the DEIR does it explain where the funding will come from to pay for this expensive plan. In a time when state funds are scarce, state and federal budgets are being cut back, and student tuitions are rising, how does UCSF plan to find the funds for their ambitious plan?

Conclusion

Sutro Forest is a magnificent forest, a beautiful island of quiet serenity in the heart of our noisy windy city. Please do not turn it into a 'forested setting' with a sparse population of widely spaced trees struggling to survive against the strong winds. I ask that you vote to adopt the "No Project" alternative.

Sincerely,

Jane Judith Risk, SFUSD teacher & Sierra Club National Outings leader  
64 El Sereno Court  
San Francisco, CA 94127  
Email: j2risk@gmail.com

March 12, 2013  
Cc: Board of Regents, University of California

-----Original Message-----

From: Jane Risk [mailto:j2risk@gmail.com]

Sent: Monday, March 18, 2013 10:39 AM

To: Campus Planning - EIR

Subject: first photo

Dear Ms. Wong;

Attached is the first of two photos which I mentioned in the letter I just sent to your office. It shows a more accurate depiction of trees spaced 30 feet apart.

Jane Risk





-----Original Message-----

From: Jane Risk [mailto:j2risk@gmail.com]

Sent: Monday, March 18, 2013 10:42 AM

To: Campus Planning - EIR

Subject: second photo

Dear Ms. Wong:

Attached is the second photo which I mentioned in the letter I just sent to your office. It shows an area in the Interior Greenbelt section of the Sutro Forest that has recently been logged, with one lone tree struggling to survive on the barren hillside.

Jane Risk



From: [Joan Rosen](#)  
To: [Campus Planning - EIR](#)  
Subject: Sutro DEIR - Tree Cutting  
Date: Monday, March 18, 2013 8:14:23 AM

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Dear Ms. Wong:

The information available from UCSF is woefully inadequate regarding what they actually DO plan to do (it includes only what they do not, as in “It’s not true that we’re going to cut down 30,000 trees.” So how many are they going to cut: maybe a lot more?!) Given such sketchy information, plus ample evidence regarding how deleterious cutting the forest would be, I stand opposed to UCSF’s plan.

Regards,

Joan Rosen

**From:** [Jay Rosenblatt](#)  
**To:** [Campus Planning - EIR](#)  
**Subject:** Save Sutro Forest  
**Date:** Monday, March 18, 2013 8:06:31 AM

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Dear Diane Wong,

I have been a SF resident for over 30 years and Sutro Forest is the only real wildlife sanctuary that is left in this city. I implore you to leave it as is. The reasons given for changes are dubious at best.

Sincerely,  
Jay Rosenblatt  
4159 20th Street  
San Francisco, CA 94114

From: [Nancy Ruttenburg](#)  
To: [Campus Planning - EIR](#)  
Subject: destruction of Sutro Forest  
Date: Monday, March 18, 2013 5:56:48 PM

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Dear Ms. Wong:

I am a resident of Cole Valley and a frequent hiker in the beautiful Sutro Forest. I can't understand the logic of destroying one of the city's most beautiful resources. This is a plea to halt the desecration of this priceless forest.

Yours truly,  
Nancy Ruttenburg

Nancy Ruttenburg  
William Robertson Coe Professor of American Literature  
Professor of English, Comparative Literature, and Slavic Literatures  
Director, Stanford Center for the Study of the Novel

Department of English  
Bldg. 460, Margaret Jacks Hall  
Stanford University  
Stanford, CA 94305  
Tel: 650.725.1644  
re [Dostoevsky's Democracy](#):  
<http://press.princeton.edu/titles/8795.html>

From: [bonnie schindhelm](#)  
To: [Campus Planning - EIR](#)  
Subject: The Sutro Forest  
Date: Monday, March 18, 2013 4:19:29 PM

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To: Diane Wong

I can't even imagine why this should be an issue to begin with. I started walking in the forest 7 years ago and it was lush and thick with trees and I was awestruck by it's beauty and the fact that this piece of land was actually in our City. I still love walking up there, but it's beginning to look like a lumber company has come in and trashed it up a bit, and it's no longer as beautiful as it once was. I meet people from all over up there and they love it and when they come to the City, they make sure they take a walk up there. It has become part of this City, a place that we take pride in, an escape from City life.

I hear all these stories about the trees are not native (who in the hell possibly cares about that...a tree is beautiful by definition and belongs where it stands), or that it's a fire hazard (that's crazy, the trees help keep the moisture in and stops erosion). And the list goes on.

I'll keep this short. Sometimes I wonder if all this is just a smoke screen so that UCSF can clear it slowly to build on it... . Whatever the reason, when that forest goes, so does a beautiful part of the City. I don't understand when there is something of beauty, why people want to tear it down. It's trees people....it's beautiful...get over that concrete mentality.



**From:** [Personal](#)  
**To:** [Campus Planning - EIR](#)  
**Subject:** Sutro tress  
**Date:** Monday, March 18, 2013 8:21:55 AM

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Don't do it. Don't use time and financial resources for this project.

Elissa schwartz

**From:** Robin Sherrer <rserrer@gmail.com>  
**Sent:** Monday, March 18, 2013 14:03  
**To:** Campus Planning - EIR  
**Subject:** Leave Sutro Forest alone!!

Dear Diane -

Please leave Mount Sutro Forest alone. It does not need tampering with in any way. The EIR was originally part of the process to allow for the building of the 34 units on Mount Sutro, the units that have just been approved. UCSF has no business meddling in native/non-native plant issues any more than native/non-native human issues. Dispersion is responsible for the spread of plant and animal species around the globe, and there is no sign of this law of physics abating. As it stands now, the (more flammable) native species need legislation, manpower, irrigation and chemicals in order to gain a foothold, and more of the same in order to survive in this non-native city that plants palm trees, monkeypaw, and other non-natives in its streets and parks.

To me, to many, the smell of San Francisco is the smell of eucalyptus, the light of the long fluttering leaves, the tendrils of bark. This oxygen-generating noise-damping forest is good for the whole city, and most especially for the patients of UCSF. Your patients need this buffer, the whole city needs it.

One of your early mistakes was in thinking that this was a neighborhood issue. The whole city cares, the whole city is watching.

There is a lawsuit in the East Bay against those who condemned the eucalyptus out of fear and ignorance; do we want the same here?

There are many points to consider. Please read the following for more of the points that have been made better by others:

#### [Save Mount Sutro Forest](#)

Saving the Mt Sutro Open Space Reserve

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[“Don’t Cut Me Down”: Found in Sutro Forest →](#)

## Flaws in UCSF's Sutro DEIR: Public Comments Due 19th March 2013

Posted on [March 15, 2013](#) by [webmaster](#)

This post is about flaws in UCSF's Draft Environmental Impact Report (DEIR) for Mount Sutro Open Space Reserve. It isn't comprehensive, but hits some of the high points.

Here is the PDF of the DEIR: [Mount Sutro EIR 1-16-13 with Appendices](#)

### **MISLEADING PICTURES**

The DEIR avoids showing **mock-ups of what the forest might look like after its Plan is implemented**. Instead, it shows two sets of Before and After pictures eucalyptus trees elsewhere, provided by hired urban forester, Ray Moritz. (Page 4.1-15 and 4.1-16 of the DEIR, included here for purposes of discussion and criticism.)

#### *Highway 1 "13 Curves", Point Reyes National Seashore*



**Before**



**After**

Source: Ray Moritz

**Figure 4.1-17**  
Highway 1 "13 Curves" Project

The pictures show a forest with understory removed, but the trees are clearly not spaced 30 (or 60) feet apart. They appear to be spaced 8-10 feet apart, similar to the average spacing in Mount Sutro Forest now. (Given 740 trees per acre, it's 8-9 feet apart.) Both "after" pictures include thin trees of the kind that would be eradicated under the Plan. So what the pictures actually represent is how the forest might look without its understory, vines, or epiphytes – but without any tree-felling.

*Camino Del Canyon, near Muir Woods National Monument*



Before

Source: Ray Moritz



After

Figure 4.1-18  
Camino Del Canyon Project



Australian eucalyptus forest. Photo credit: Tim Chen, 123RF Stock Photo



This is a normal eucalyptus canopy but UCSF calls it sparse. Source: UCSF

The DEIR also includes **pictures of the canopy which it characterizes as sparse and unhealthy**. This reflects a misunderstanding of the forest and the species; it is actually the natural canopy of a eucalyptus forest, which is airy and not very dense, thus allowing for a subcanopy of smaller trees (acacia, plum in Suto Forest), and a lush understory. *[Edited to Add pictures. For comparison, we show a stock photo of an Australian eucalyptus forest as well as the "sparse tree canopies" from the DEIR. (Page 4.7-4 of the DEIR, included here for purposes of discussion and criticism.)]*

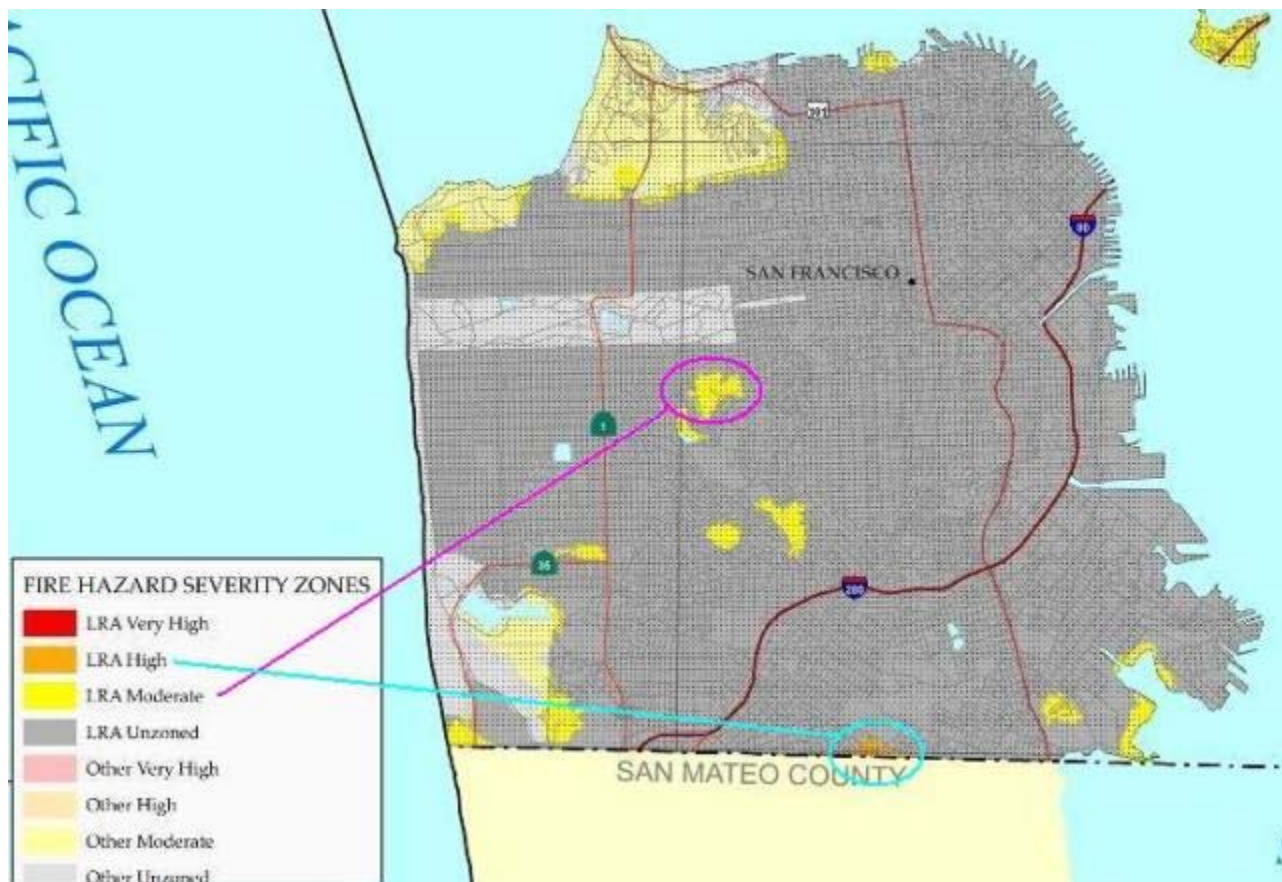
## EXAGGERATED FIRE HAZARD – AND HIGH-RISK “SOLUTION”

The DEIR **exaggerates the fire hazard** – and its Plan will actually increase the risk by making the forest much drier and windier. (There’s a statement from a professional forest ecologist [HERE](#).)

The arguments in the DEIR repeat those in the FEMA application: Eucalyptus is uniquely flammable owing to shed bark and oils within the leaves; dense forests are more flammable than open ones; that fires in the forest in 1899 and 1934 indicate its vulnerability; that the fires on Angel Island and Oakland are examples of fires that could occur in Mount Sutro Forest; that hot dry northeast winds in autumn cause a period of vulnerability for “several weeks.” **We thought we had already answered those arguments** in this post: [UCSF, Sutro Stewards, and the Fund-Raising Fire Hazard](#), and in this earlier post, [Mt Sutro: The Fire Hazard That Wasn’t](#).

Sutro Forest is a de-facto Cloud Forest. It gets 30-40% more moisture than surrounding areas by catching moisture from the fog, which it then holds in its duff and understory. (We have an [illustration of the process HERE](#).) *This may be the wettest part of the city that isn’t actually under water.*

According to CALFIRE, the hazard rating for Mount Sutro Forest is “**moderate**” – **its lowest risk rating**. The DEIR seeks to dismiss this by saying the map is a draft and could change. However, CALFIRE also noted: “*Update, 11/2008: CAL FIRE has determined that this county has no Very High Fire Hazard Severity Zones in LRA [Local Responsibility Area].*” That covers Mount Sutro Forest. Clearly, in CALFIRE’s assessment, there is no Very High Fire Hazard.



San Francisco city **does not get hot dry northeasterly winds** (commonly called ‘Diablo’ winds); even when the East Bay has these conditions, the city remains cooler. According to the 2001 Plan, the



vulnerability is for “up to ten days in the autumn.” In 2009, we maintained a daily FogLog during this so-called ‘period of vulnerability’ and recorded only 7 dry days – i.e. days when neither fog nor rain provided the forest with moisture. **It will not dry out in 7-10 days in its natural state.**

**The fire hazard can be raised, however, by “thinning” the forest.** This will dry out the “thinned” areas, and increase wind-speeds, thus increasing the likelihood that fires will spread if they start. So far, there have been – we are told – 3 small fires, the last in 1999. It was extinguished in 20 minutes. Had the forest had been drier and windier, and had it been a fire of grass and shrubs, it could have spread rapidly as the Angel Island fire did.

In fact, **both Angel Island and the Oakland fire are counter-examples.** Angel Island was covered with eucalyptus trees for decades. During that time, the only reference we could find to fire was a fire in a building. Since the trees were removed, there have been a number of fires, culminating in the October 2008 fire – which burned the grass and shrubs and stopped at the tree-line.

The Oakland fire also started with shrubs and grasses. It spread to trees and buildings, but the trees were victims of the fire, not the cause of it. The main fire spread from house to house. [A report on that fire, from David Maloney who was on the investigative task force, is HERE.](#) It also clarifies that eucalyptus is not particularly flammable.

The weather conditions in Oakland and on Angel Island are also completely different from Mount Sutro’s. Both those places have more extreme and drier weather. Sutro Forest’s uniquely wet micro-climate is not comparable – though once the forest has been thinned and dried out, the comparisons might be closer.

You can already see evidence of this drying on the new trail from Stanyan, [where 50 trees were cut along the trail](#), thus opening huge gaps in the canopy. A lot of understory was also removed. The forest is visibly drier there than in the more enclosed parts. Even the DEIR says it’s the South-facing slopes that are warmer and drier, in fact it’s the open areas on the east side that are dry now. A walk along the Historic Trail illustrates this as well – the path can change from dry dust to damp earth within a few inches, depending on the state of the forest. If the whole forest is made as dry and dusty as these areas, by removing thousands of trees and nearly all the understory, the hazard could increase.

Incidentally, during the public meeting prior to that trail being built, Ray Moritz, who is UCSF’s hired arborist, also made a presentation as a fire ecologist and [declared the fire hazard to be low.](#)

## **CARBON SEQUESTRATION**

With global warming, carbon storage is becoming an increasingly important issue. In fact, California has a specific law about it: AB32. UCSF also has a policy to reduce greenhouse gases.

Eucalyptus trees are excellent carbon sinks: They grow large and fast, the wood is dense, and they’re long-lived in wet conditions like Mount Sutro (around 400-500 years). The acacia understory makes the forest even better at sequestering carbon; acacia is a nitrogen-fixing tree, so both the eucalyptus and the acacia grow better together. They also store more carbon in the soil. Obviously, felling these trees will be a double whammy. They won’t be pulling more carbon out of the air. Instead, they’ll be chipped and mulched and decaying – and thus releasing carbon.

**The DEIR makes several mistakes as it attempts to wiggle its way out of this dilemma:** chopping down thousands of trees and leaving them to decay, vs the negative carbon impact. Here’s what it does:

First, it **underestimates the carbon stored in the forest, and continued sequestration**, in six ways:

- It uses calculations based on six tiny cherry-picked plots (one-tenth of an acre each) that had fewer and smaller trees (**averaging 175 trees per acre instead of 740 trees per acre for the whole forest!**);
- It **calculates the tree-loss per acre based on the 175 trees/ acre** and estimates 62 trees per acre will be left standing – so only 113 trees per acre are felled instead of 678
- It **excludes all trees under 5 inches in diameter**;
- It **excludes understory vegetation** because it's only 5% of the total carbon storage;
- It **ignores soil storage** (about 50% of a forest's carbon storage) because it's stable, even though the kind of activities planned for the Reserve **would undoubtedly cause soil disturbance and release carbon**; and
- It uses a calculation based on 40% of the wood from felled trees being used for timber (like for furniture) – which of course means the carbon is stored for a much longer time than if the tree is in woodchips decaying on the ground. It reaches a conclusion that the short-term reduction in carbon storage would be 29% of the forest's total storage – 11,286 tons (or 10,239 metric tons) of carbon dioxide.
- It argues that mature trees have stopped sequestering carbon, while young trees would absorb carbon at higher rates. This is only true if trees stop growing; but there's no evidence that these trees have. They are young for eucalyptus trees, which can live 400-500 years. In fact, since trees absorb carbon in proportion to the wood they add, the larger trees may be absorbing carbon at a lower rate than small trees, but actually taking in a larger amount.

**We estimate their numbers are between 1/3 and 1/4 of the realistic amounts. The storage numbers are understated, and the removal numbers even more understated.**

Second, it **looks at a 30-year scenario (the projected life of the Plan)**, and divides the carbon storage loss by 30. We are not sure where the 30-year project life comes from.

Third, it argues that **over 30 years, the carbon storage capacity will recover**. The trees will be thinned the trees that remain will be healthier and grow larger, (despite the risk of wind throw killing remaining trees, and destruction by herbicides through the intergrafted root system). Because the understory will be destroyed, they say, new trees will be able to grow (despite the thick layer of eucalyptus chip mulch and the plan to poison them or yank them to prevent them from growing.) It also claims reduction in tree mortality because there'll be fewer pest infestations (which don't actually exist now, but are speculated about).

## **HEALTH OF THE FOREST**

The DEIR claims the forest is unhealthy, with overcrowding, dying trees, and an infestation of various insects including of snout beetles in some areas.

- We wonder if UCSF had an entomologist look at the beetles, because **snout beetles have mainly been seen in Southern California**. In any case, they are **readily controlled through release of a parasitic wasp**. (This [UC Davis publication has details](#).)
- Except for major infestations, **it's normal for a forest to have insects** – they're part of the ecosystem, in fact, the foundation of it.
- The DEIR states that the forest is crowded because **eucalyptus is well-adapted to the site, it's very prolific, and re-sprouts vigorously**. This does not sound exactly like ill-health.
- Some trees – especially the thin saplings that have not reached the canopy – are dead or dying. **This is a natural process of self-thinning**. It is better than the artificial thinning proposed in the

Plan, because the forest varies greatly in terms of topography, wind, temperatures, and other growing conditions. The trees that flourish are best adapted for that particular space.

- The DEIR mentions that new trees are not growing into the canopy. We cannot see why this is an issue, since the tree density is considered more than adequate already. We cannot see why felling 90% of the trees per acre will improve the health of the forest.
- The last detailed assessment of the forest was made in 1999, by Hort Science. Though the DEIR claims that two arborists hired subsequently reported a deterioration in conditions, they haven't actually documented anything. Now, 13 years later, **the DEIR still uses Hort's estimate of tree density and tree numbers: 740 trees per acre, and 45,000 trees in total.** This suggests that the deterioration is insignificant.
- It also "spun" Hort's report as follows: *"the general condition of the Reserve's trees is only fair to good, but the prevalent small trees throughout the forest are generally in worse condition than the large trees that dominate the forest canopy."* Here's what Hort actually wrote: *"In general, the trees that make up the canopy were in good condition. Trees in the understory had generally poor health."* **Hort's report sounds like a forest in the process of self-thinning.** The trees that win the race for light flourish; the others survive or die depending on their specific circumstances.

If the **forest is considered as a naturalized forest**, [it will be seen as healthy and self-regulating](#); it's a population of trees in various conditions. Only if it's considered a plantation – or still worse, an invasive species – does it make sense to intervene aggressively.

## AIR QUALITY

Trees and bushes fight pollution, especially small particulate matter that is bad for human lungs. They trap these particles on their leaves until they are rained down, thus removing them from the air, and absorb noxious gases. The DEIR does not address or quantify the loss of pollution control – which is likely to run to thousands of pounds of contaminants.

## WILDLIFE

The assessment of wildlife is based on two (presumably daytime) site visits by the consultants, and guesswork based on the habitat conditions. There was no camera trapping, extended observation, or year-round observation to allow for seasonal changes.

- **Insects.** The DEIR only speculates, and it's wrong. "Native insect within the Reserve is expected to be low because of the dominance of non-native eucalyptus." The insect fauna of the shady understory of the eucalyptus forest would include moths, flies, and beetles. (We have also observed butterflies.) Further, it's not true that native insects use only native plants; many species adapt to non-native plants quite readily. It adds "two species of eucalyptus borer may occur... heavy infestation of these species may kill eucalyptus trees." We are not clear why this section was even included, since it contains no actual information as to what species of insects actually occur (not "may" occur) in the forest.
- **Amphibians and reptiles.** They didn't see any on their two site visits. They're guessing at what might live there, based on the habitat.
- **Birds.** This section is the most descriptive, and they actually observed some birds, and actually recognizes its value to birds, both resident and migratory. It fails to describe the impact of removing 90% of the trees and understory on birdlife. The olive-sided flycatcher is a species of special concern that may nest in the forest. It's a forest species, and was heard in the East Bowl, the area of Demonstration Project #4 – which, spaced at 12-15 trees per acre, will no longer be forest once the Plan is implemented. It also needs snags – dead trees – which will be the first to go when the thinning starts.



- **Mammals.** They only saw a squirrel, but think the forest could house opossum, deer mice, raccoons, skunks – and black-tailed deer. No, we have no deer. They also guess at what bats might use the forest.

On page 4.3-20, it claims the forest is **not a wildlife corridor** because it's surrounded by urban development. In fact, if viewed from an animal's viewpoint, it is part of a system that connects to a broader area - Glen Canyon, Twin Peaks, Laguna Honda Reservoir, and Golden Gate Park. It says "the relatively limited amount of vegetation removal... would not interfere..." We're not sure it defines the loss of 90% of the understory (which is what matters most to non-flying critters) as "relatively limited."

The mitigation for birds nesting is also interesting – they're going to try to work outside the nesting season, and retain a few snags for woodpeckers. If they're working between Dec 15 and August 15, they'll call in a biologist to do a nest survey and cordon off nests. But the DEIR **ignores the effect of the reduced habitat for birds the following season**, which certainly is not "less than significant."

[About these ads](#)

## 2 Responses to *Flaws in UCSF's Sutro DEIR: Public Comments Due 19th March 2013*

1. *Meg Rosenfeld* says:  
[March 15, 2013 at 5:23 pm](#)

The information available from UCSF is woefully inadequate regarding what they actually DO plan to do (it includes only what they do not, as in "It's not true that we're going to cut down 30,000 trees." So how many are they going to cut: maybe a lot more?!) Given such sketchy information, plus ample evidence regarding how deleterious cutting the forest would be, I stand opposed to UCSF's plan.

[Reply](#)

2. *Velma Kingsbury* says:  
[March 15, 2013 at 8:47 pm](#)

Why are we always fighting to keep the status quo? Why can't things be left alone? Have lived in SF my whole long life and almost all I remember is fine the way it stands and will probably be fine for years to come. My children hiked in Sutro Forest... my brother lived next to it near the top of Stanyan. Leave it alone. What I do remember about the 70s and 80s is people breaking into the cages in back of UCSF to rescue the dogs who were being experimented on.

Velma Kingsbury

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- ["Don't Cut Me Down": Found in Sutro Forest](#)
- [Flaws in UCSF's Sutro DEIR: Public Comments Due 19th March 2013](#)
- [Sutro Forest Statement by Dr Joseph Mascaro](#)
- [UCSF's Mt Sutro DEIR: How Many Felled Trees – 30,000 or 22,000 or zero?](#)
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- **A HIKE IN SUTRO FOREST (Links)**
  - [A Few Hiking Pointers \(and map\)](#)
  - [Mount Sutro Forest](#)
  - [Mt Sutro page of a review of various San Francisco places](#)
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  - [Saving SF's Natural Areas](#)
  - [Scripps Central: San Diego conservation](#)
  - [Urban Forests and Carbon Footprints](#)

- **SITES OF INTEREST (Other Links)**

- [A great blog about Bay Area excursions and interests](#)
- [Drought Update](#)
- [Golden Gate Park: stories from our neighboring park](#)
- [UCSF's Mount Sutro links](#)
- [What happens to water when it hits the land?](#)

[Save Mount Sutro Forest](#)

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*R o b i n S h e r r e r*  
422 Russia, San Francisco 94112

From: [Morley](#)  
To: [Campus Planning - EIR](#)  
Subject: Comments on DEIR  
Date: Monday, March 18, 2013 9:21:41 PM

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## PUBLIC COMMENT ON DEIR FOR SUTRO FOREST

I am Dr. Morley Singer. Some of my comments here are in addition to direct challenges to the UCSF DEIR by others and are intended to assist various readers in evaluating UCSF's misguided actions.

I took my Residency training in Anesthesiology at UCSF and a one year Fellowship in the Cardiovascular Research Institute. I subsequently was invited to join the Faculty. I created the first Intensive Care Unit at UCSF and was Director for 10 years. I tell you this so you will understand that I am grateful and have great respect for the institutions activity and excellence in patient care, education and research.

However, the long term efforts and expense in attempting to essentially destroy Sutro Forest are a mind boggling aberration, an experiment with unpredictable results, irreparable damage, and NO BENEFITS.

Following is a list of some items relevant to the subject and the DEIR:

1: PUBLIC MEETINGS: Though UCSF has held public meetings, the agenda has always been to issue misleading information and propaganda. The meetings were run and controlled by Mr. Iacofano, a professional hired by UCSF at significant expense. (Was there no individual at UCSF able to conduct a public meeting?) At one meeting he had a forester, also hired by UCSF, give a 1 hour presentation of questionable relevance, and repeat the presentation at the very next public meeting, in spite of protests from the audience that all but 1 person present had already heard it. At another meeting UCSF staff announced their intended plans and would not allow questions or comments from the audience. The so called 'Community Advisory Group' was hand picked to favor the native plant enthusiasts already allied with UCSF. Opposition to this project is NOT confined to a few individuals in the neighborhood; as knowledge of the project emerges, THOUSANDS HAVE OBJECTIONS. A potential PR disaster for UCSF. This should be addressed.

2: FIRE HAZARD: Repeated presentations by UCSF overstated the fire risk and put out misleading or totally incorrect information, clearly intended to generate fear. UCSF withdrew their grant application to FEMA when challenged by the FEMA administration to produce objective evidence of fire risk. High level UC individuals travelled to Washington to persuade Senator Dianne Feinstein to pressure FEMA into releasing funds. (this was from UC Berkeley)

It is abundantly clear from careful research that UCSF plans would INCREASE, not decrease the risk of fire. (details by others)

UCSF sent out to the Community a bizarre description of an out of control fire starting in Sutro Forest, spreading across City streets to the Laguna Honda home, over a mile away, and causing Billions (!) of dollars damage.

This was a ridiculous exaggeration and a transparent effort to generate fear.

3: PUBLIC RELATIONS: UCSF has a strong and energetic PR staff. Public relations has been described as "a euphemism for propaganda" or "creation of a false reality". All communications with the Community are from the PR department. They not only have no expertise in forest management, several of the senior staff in PR had never been in the forest! (until a few years ago, at my invitation, in hopes of educating them) They have proceeded relentlessly in their attempts to kill the trees. The 'trial' areas are just another step---who and how and when will results be evaluated? Who is steering the boat? Is this project generated solely by the PR staff? This should be addressed.

The Community has tried repeatedly to have a meeting with 2 consecutive Chancellors, both talented fine individuals. (our naive view that if we reached an intelligent person with authority, the Sutro project would be terminated.) Two Chancellors did not meet, yet State Senator Leland Yee and Assembly person Fiona Ma were not too busy to meet, to walk the forest, and were sympathetic.

So, who are the Prime Movers behind the irrational expensive plan to harm the uniquely beautiful

forest? Do they have a sense of UCSF's laudable primary functions, finances, relationship to State government, or are they narrowly focused on Native Plants? Do they understand the potential adverse publicity for the University?

4: ECONOMICS: A MAJOR ISSUE! The press is full of stories of UC financial hardships, cutting back of services, raising tuition, etc. UC President Mark Yudof tells the Regents that thousands of qualified students will be turned away and UC can't afford its mission. ( SF Chronicle, Jan 20, 2011)  
UCSF has spent vast amounts of staff time over more than a decade. They have hired and rejected outside consulting firms who offered a menu of minimal expense (ie leave the forest as is). The current proposed plan would cost Millions over a period of time. What are the benefits to UC and the community for this huge expense? An outside audit of UCSF staff expenses on this project over a decade should be done.  
IS IT APPROPRIATE TO RE-MODEL THE KITCHEN WHEN THERE ARE NO FUNDS FOR GROCERIES?

5: A few more technical concerns:

MICRO-CLIMATE EFFECTS: Thousands of homes are in the sheltered lee of the forest, protected there from wind and fog. The predictable adverse effects of losing this protection is a serious economic, quality of life, and increased fire threat to these residential areas. This should be addressed.

PESTICIDES: The most current issue of CA, a cancer journal published by the American Cancer Society(Mar-Apr 2013) includes an article "Increased Cancer Burden among Pesticide Applicators and others due to Pesticide Exposure"  
The article states: "a growing number off well-designed epidemiological and molecular studies provide substantial evidence that the pesticides used.....are associated with excess cancer risk". "This risk is associated both with those applying the pesticide and in some conditions, those who are simply bystanders to the application".  
Is it appropriate for UCSF, a institution dedicated to health care, to engage in use of proven cancer causing chemicals?! This should be addressed in detail.

6: FOREST HEALTH: A UCSF hired forester says the forest is 'unhealthy'. Two other qualified professional foresters say it IS healthy. If you were the patient, and feeling vigorous and fine, which opinion would you accept?  
This should be addressed.

I have avoided here debating the 'native plant' movement as it akin to debating women's education with the Taliban. Yet, the movement is widespread in our society and it appears to be a force here. This should be addressed.

SUMMARY: The reader may find my words blunt and harsh. I am offended by UCSF, a world class institution of higher learning, flush with Nobel prize winners, pursuing such an irrational project, totally lacking in science or common sense and using questionable methods to pursue it. Frankly and sincerely I find it embarrassing. Even the so-called 'test areas' are a bad idea. The harm done is permanent. There is no objective method to assess the results. A high school chemistry teacher would dismiss this as not a suitable experiment.

I hope these anecdotes will enlighten the newly arrived reader. This message is intended to help prevent UCSF from making a serious blunder.  
This project should be abandoned,and the Forest left 'as is'.

I hope that reason and good judgement will prevail.

I would be glad to answer any questions in person or by phone.

Morley M.Singer M.D.  
Professor Emeritus UCSF

177 Belgrave Ave  
San Francisco, Ca 94117  
Tel: 415-566-1371

mzinger 1@comcast.net

From: [Glen Smith](#)  
To: [Campus Planning - EIR](#)  
Subject: Sutro Forest  
Date: Monday, March 18, 2013 7:18:27 PM

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Dear Diane,  
I will not endeavor in this writing to enumerate the myriad virtues, both ecological and aesthetic, for preserving Sutro Forest as it is. I assume you have been presented with a substantial amount of information and data for your consideration.

I do, however, wish to add my name to those who, for so many good reasons, fervently hope that the ill conceived tree removal initiative will be abandoned.

Sincerely,  
Glen R. Smith  
San Francisco

From: [sarah staats](#)  
To: [Campus Planning - EIR](#)  
Subject: Comment: Sutro Forest DEIR  
Date: Monday, March 18, 2013 4:30:38 PM

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Dear Dianne Wong,

As a resident of 144 Woodland Ave. since 1974, I've watched the slow evolution of the forest over the years. I welcomed the introduction of the hiking and biking trails which I found a positive, limited, well- thought-out improvement not only to our neighborhood, but for the enjoyment of other city dwellers and visitors.

In contrast, the project proposed by UCSF seems difficult to understand, incoherent and perhaps even misleading, which has led to wide speculation about what it actually boils down to. It seems that some of the measures planned could result in effects directly opposite to those of the stated goals. That is, it might well increase, rather than decrease, the fire hazard.

If UCSF continues to be genuinely interested in intelligent forest management, a new plan would be in order. This one is simply too flawed to be implemented in an era in which careful scientific stewardship of natural resources is vital.

Sincerely yours,

Sarah Staats



From: [Kaylah Sterling](#)  
To: [Campus Planning - EIR](#)  
Subject: please reconsider felling 30,000 trees in Sutro Forest!  
Date: Monday, March 18, 2013 8:43:25 AM

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Please note that I, amongst many tree lovers, oppose the UCSF plan for felling up to 30,000 trees in Sutro Forest.  
Please reconsider!

Warmly,

Kaylah Sterling

*"People can't see your mind, what people see is a manifestation of your attitude in your actions of body and speech. Pay attention to your attitude all the time, guard it as if you are the police, a parent caring for a child, a bodyguard... as if you are the guru and your mind is your disciple." Lama Zopa Rinpoche*

*"May there be peace, love and perfection throughout creation," John Coltrane...A Supreme Love*

**From:** [Sara Templeton](#)  
**To:** [Campus Planning - EIR](#)  
**Subject:** Mount Sutro Deforestation  
**Date:** Monday, March 18, 2013 9:56:28 AM

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Dear Ms. Wong,

I am writing to express my concern and deep disappointment in UCSF's current plan to enact an aggressive deforestation plan on Mount Sutro. While I understand the general practice of tree thinning as a method of fire control in dry, arid locations, the ecosystem in question is a cloud forest - its is fire retardant in nature, and by weakening the forest structure UCSF is potentially increasing fire risk. And most incredibly, there seems to be very little scientific evidence that Mount Sutro poses a notable fire risk in the first place! Beyond the fire issues, this plan would also have potentially significant negative impacts on the wildlife, remaining flora, SF's carbon footprint, and air quality. As an organization that has been fairly vocal about it's environmental commitment, I call on UCSF to walk it's talk and work to find a more balanced, intelligent solution to it's long-term stewardship of Mount Sutro.

Thank you.  
ST

From: [Suzanne Valente](#)  
To: [Campus Planning - EIR](#)  
Cc: [sfforestnews@gmail.com](mailto:sfforestnews@gmail.com)  
Subject: Comment on Mount Sutro DEIR  
Date: Monday, March 18, 2013 10:25:40 AM

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As a proud graduate of UCSF, I am mortified by the use of such flawed "science" to justify these planned changes to the Mount Sutro forest. There is not now, and has never been, good scientific data to justify this preference for "native" trees and vegetation as opposed to non-native imports to San Francisco such as the eucalyptus. Before the planting of eucalyptus, San Francisco had few, if any, trees. The landscape consisted of blowing sand dunes and sparse lessingia (a plant that to the average person looks like a weed). Because this nativist ideology has no legitimate scientific basis, and seeks to remove trees that the populace appreciates and enjoys, perpetrators of these plans are forced to resort to misleading photographs, exaggerations of risk, and frankly, outright lies in an attempt to make these plans appear reasonable and palatable to the public.

**The DEIR exaggerates the fire hazard – the management activity will increase—not decrease—the risk of fire.** The present microclimate of the Sutro forest is cool and moist, with predominately healthy trees. The forest promotes fog drip, and blocks wind. By thinning the forest and removing most of the understory vegetation, the management activity will open the canopy of the forest resulting in drier and hotter duff on the forest floor and a greater risk of fire. CALFIRE currently classifies the fire risk of this area at its lowest level of risk, which is moderate.

**Second, the management activity will increase carbon emissions to the atmosphere.** In the report, UCSF justifies these carbon emissions on the grounds that, after the cutting, more eucalyptus trees will grow to accumulate any lost carbon. UCSF is disingenuous on its views regarding eucalyptus: they first suggest that it is bad because it increases fire risk, and then suggest it is good because it grows quickly.

**Third, the management activity will damage the biological diversity and character of Mt. Sutro.** The forest on Mt. Sutro is, indeed, a novel ecosystem with many introduced species. Yet it is a diverse, functioning ecosystem providing many services, the most interesting of which is that it provides a small piece of wild nature in the heart of our city. The forest is old, but it may not yet be mature. There is no forest perfectly analogous to what exists on Mt. Sutro – a cosmopolitan mix of species, much like San Francisco. The fact that the forest is strange to us is not a sufficient justification for destroying it.

**Fourth, the management activity will increase the risk of Lyme disease and other vectorborne diseases in the urban environment.** On page 4.3-20 of the DEIR, it claims the forest is not a wildlife corridor because it's surrounded by urban development. In fact, if viewed from an animal's viewpoint, it is part of a system that connects to a broader area - Glen Canyon, Twin Peaks, Laguna Honda Reservoir, and Golden Gate Park. Although the report indicates only a squirrel was observed at Mount Sutro, the authors think the forest could house opossum, deer mice, raccoons, skunks – and black-tailed deer. The desire to bring additional species from outlying areas to this Mount Sutro location brings with it the risk of infectious diseases carried by the ticks that come with mammals. In urban areas where these "wildlife corridors" have already been established, we are seeing the

introduction of ticks carrying Lyme disease and other afflictions into residential neighborhoods. I know--it has happened in my neighborhood.

**Fifth, the proposed changes will adversely affect species currently found in the Mount Sutro forest.** For example, it is acknowledged in the DEIR that birds inhabiting this forest will be affected by the tree removal. The mitigation for the nesting of birds is absurd – they’re going to try to work outside the nesting season, and retain a few snags for woodpeckers. If they’re working between Dec 15 and August 15, they’ll call in a biologist to do a nest survey and cordon off nests. But the DEIR **ignores the effect of the reduced habitat for birds the following season**, which certainly is not “less than significant”.

UCSF must remain true to its scientific roots and withdraw this management proposal. Tell the Regents to concern themselves with REAL problems in the UC system.

3/18/13

DIANNE WONG  
UCSF CAMPUS PLANNING

MY WIFE AND I WALK MT.  
SERRA FOREST/PARK 2, 3 TIMES  
A WEEK. WE HAVE SEEN NOW  
POINTED TO DEAD TREES, ASKING  
US TO WRITE YOU DO NOT  
CUT THE DEAD TREES.

WE DO WANT THE DEAD/  
DANGEROUS TREES CUT! PLEASE

114 BELGRAVE AVE S.F. CA 94117

1102 Sanchez Street • San Francisco, CA 94114 • (415) 550-1516

March 18, 2013

Diane Wong, Environmental Coordinator  
UCSF Campus Planning  
PO Box 0286  
San Francisco, CA 94143-0286

**RE: Draft Environmental Impact Report for UCSF Mount Sutro Management Project**

Dear Ms. Wong:

The EIR for the removal of healthy trees and undergrowth on Mt. Sutro inadequately addresses many concerns of the neighbors and those who love this forest. I wish to alert you to just two of the many failings of this environmental review.

First, the long term soil erosion to the mountain from the destruction of so many trees has not been addressed. The size of the trees' root systems that have grown up over the past hundred years have stabilized this area such that buildings comprising the UCSF campus could be built and residential communities developed. When this was just an unforested mountain, the shifting sands bothered few people because development was minimal. Now that this land is occupied with hospitals and homes, much more is at stake than the community in the late 1800's.

I lived on Willard Street for 14 years as the Mt. Sutro area was being developed. I was in the neighborhood in the 1970's and was present the day the newly finished view home on Warren Drive fell down into the street. It was heart breaking to see this tragic loss of property. This EIR has not addressed the impact of losing so many trees on this already designated landside area. UCSF cannot ignore studying the cumulative impacts of removing so many large trees systems and expecting small, bush like trees to replicate the soil stability properties that currently exist. You have a public duty to protect both public and private property from landslides.

Second, having lived next to the forest for 14 years, I loved the magnificence of the tall trees and wildlife in my backyard. I felt privileged to in a city that had a sense of place and respect for nature. Yes, nature! since I do not subscribe to limiting nature to just the native plants that once grew in the city. Nature includes those living things here today that have survived climate change and human impacts. You have a public duty to protect one of the most outstanding splendors of the city - an intact forest - for nourishment of the public's souls.

I flatly reject the false argument against the eucalyptus trees as a major fire hazard. All plants burn. Appropriate forest management is needed, not the proposed drastic plan UCSF is supporting.

For the record, I worked for UCSF for over 30 years. I was proud to be a member of this fine medical facility, teaching and research complex. I now wonder what has happened to UCSF to be so misguided in this project. Please do not accept this flawed EIR.

Sincerely,

Nancy Wuerfel

2516 23<sup>rd</sup> Avenue, San Francisco CA 94116



From: [Mike Zonta](#)  
To: [Campus Planning - EIR](#)  
Subject: Sutro Forest at UCSF  
Date: Monday, March 18, 2013 3:07:57 PM

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Sutro Forest is one of the most beautiful places in San Francisco. Please let's not be so politically correct that we have to chop down non-native trees and foliage. I'm not a native to this city either, but I've made it my home for over 30 years. And these trees have been here even longer.

Let them live.

Mike Zonta  
San Francisco



**From:** [Louise](#)  
**To:** [Campus Planning - EIR](#)  
**Subject:** Draft EIR attn Diane Wong  
**Date:** Tuesday, March 19, 2013 3:27:06 PM

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"San Francisco's Mount Sutro holds a forest unlike any other on Earth ... On rare clear days, blue gum trees scrape the sky, with rods of sunlight flecking off a curtain of English ivy below" (op ed in SF Chronicle by Joseph Mascaro Feb. 22, 2013). This was our first view when we stepped in to the forest from the trailhead on Stanyan Street last spring, thrilled that our adopted city contained such a marvel. Sadly, Dr. Mascaro's op ed also alerted us to the impending destruction of this wonderful natural haven in the heart of a densely urban area. I hope that UCSF will do everything in its power to keep the forest as it is, doing the absolute minimum necessary for the health of the forest as it is, while also guarding public safety. PLEASE do not destroy the essence of this magical place.

Louise Bacharach  
1445 Diamond St.  
San Francisco, CA 94131

**From:** Eugene Bachmanov <bsidecon@yahoo.com>  
**Sent:** Tuesday, March 19, 2013 3:16 PM  
**To:** Campus Planning - EIR

To: UCSF Environmental Coordinator  
Diane Wong

From: Eugene Bachmanov  
418 Arch St.  
San Francisco, CA 94132

**RE: Public Comment to the Draft Environmental Impact Report UCSF Mount Sutro Management (#2010122041)**

Dear Ms.Wong,

I am dismayed by the use of flawed "science" to justify planned changes to the Mount Sutro forest. There is not now, and has never been, good scientific data to justify the preference for "native" trees and vegetation as opposed to "invasive" imports to San Francisco such as the eucalyptus. Before the planting of eucalyptus, San Francisco had few, if any, trees. Because the nativist ideology has no legitimate scientific basis, and seeks to remove trees that the people appreciate and enjoy, advocates of these plans are resorting to misleading photographs, exaggerations of risk, contradictory statements, and outright lies in an attempt to make these plans appear reasonable and palatable to the public.

**1. DEIR exaggerates the fire hazard – the management activity will increase—not decrease—the risk of fire.** The present micro-climate of the Sutro forest is cool and moist, with predominately healthy trees. The forest promotes fog drip, and blocks wind. By thinning the forest and removing most of the understory vegetation, the management activity will open the canopy of the forest resulting in drier and hotter forest floor and a greater risk of fire. CALFIRE currently classifies the fire risk of this area at its lowest level of risk, which is moderate.

**2. The project will increase carbon emissions.** In the report, UCSF justifies these carbon emissions saying that, after the cutting, more eucalyptus trees will grow to accumulate any lost carbon. UCSF is disingenuous on its views regarding eucalyptus: they first suggest that it is bad because it increases fire risk, and then suggest it is good because it grows quickly.

**3. The project will damage the biological diversity and character of Mt. Sutro.** The forest on Mt. Sutro is, indeed, an ecosystem with many introduced species. Yet it is a diverse, healthy, functioning ecosystem providing many services. It is a small piece of wild nature in the heart of our city. The forest is old, but it may not yet be mature. The eucalyptus trees in wet cool climate live to be 400 or 500 years old. It would be a crime to destroy it - which is what this project will do.

**4. The project will adversely affect species currently found in the Mount Sutro forest.** For example, the DEIR acknowledges that birds inhabiting this forest will be affected by the tree removal. The mitigation for the nesting of birds is absurd – they're going to try to work outside the nesting season, and retain a few snags for woodpeckers. If they're working between Dec 15 and August 15, they'll call in a biologist to do a nest survey and cordon off nests. The DEIR **ignores the effect of the reduced habitat for birds the following season**, which certainly is not "less than significant".

**5. The project will substantially increase the wind and noise in the neighborhood.**

From  
[Eugene Bachmanov \]

**From:** rachele bandiera <amabanda@yahoo.com>  
**Sent:** Tuesday, March 19, 2013 10:39 AM  
**To:** Campus Planning - EIR  
**Subject:** UCSF proposal to cut trees on Mt Sutro-Please respond

Dear Diane Wong,

I don't understand why UCSF, a university and hospital, is planning to destroy a forest. What does a medical school have to do with forestry? Did the proponents of this absurd and apparently unpopular plan read the rebutal by Dr Joseph Mascaro to their Draft Environmental Impact Report? Dr Mascaro's detailed study of this report demonstrates an obvious conclusion that the University knows very little about forests and their benefits to wildlife and humanity. In addition, Dr Mascaro indicates that the draft is riddled with flaws, inconsistencies, and fabrications. Where is the University's response to his points? Why is there not even a discussion?

The biggest impact that the University's proposal to cut down 90% of Mount Sutro forest would have is in increased global warming due to reduced carbon sequestration. Trees are the only living beings on earth that actually slow down the destruction caused by global warming by absorbing some of the carbon that, through our activities, is released into the atmosphere. Every tree destroyed results in more carbon in the atmosphere and faster global warming. The faster the warming, the faster the seas rise and the land disappears. The undeniable result of that will be human and animal crowding, land and water wars, increased starvation, disease and death, and intensifying weather related devastation. I would think that any intelligent person would understand the absolutely URGENT need to preserve every single tree (unless hazardous) any- and everywhere. We need to think about the results of this impending and irrefutable devastation, if we don't do anything to stop it. That should be our number one priority, not cutting down trees!

I would like to know what is planned to be done with the wood? Has a logging company been selected by competitive bidding to buy the wood? Are there University officials related to the owners of the logging company? Are these same administrators engaged in any way in the plan to cut the Mount Sutro trees? Is there thorough transparency? Has this been disclosed to the City, State, and Union? As the loss of the prime and important function of the trees, carbon sequestration and release of oxygen, affects all of us, the University's plan should be made public in ALL of its details.

Please, I urge you to reconsider this absurd proposal for destruction!

I would like a response to my questions, not just a form letter. As the University is a public entity, you as an employee of the State need to answer the state residents' questions.

Sincerely,  
Annamaria Manodori, PhD

John D. Bardis  
1158 Green Street  
San Francisco, CA 94109

March 18, 2013

Ms. Diane Wong, Environmental Coordinator  
UCSF Campus Planning  
654 Minnesota Street  
San Francisco, CA 94143-0286

Re: Draft Environmental Impact Report for UCSF Mount Sutro Management Project

Dear Ms. Wong:

As a former president of the Inner Sunset Action Committee, I attended and spoke at the February 25, 2013 public hearing held at the UCSF Millberry Union Conference Center regarding the adequacy and accuracy of the information presented in the Draft Environmental Impact Report (Draft EIR) for the Mount Sutro Management Project, the proposal to implement a number of management activities in the UCSF Mount Sutro Open Space Reserve at the UCSF Parnassus Heights campus.

Given the maximum two minutes permitted for each person who presented oral testimony at this public hearing, it was not possible for me to convey completely my comments regarding adequacy and accuracy of the information presented in the Draft EIR. So I am submitting in writing and confirming for the public record via this letter a more complete presentation of my oral testimony that was made at the public hearing on February 25, 2013 regarding the Draft EIR.

As you may be aware, the Inner Sunset Action Committee is the community organization which has advocated over the past four decades for the protection and enhancement of the quality of life of San Francisco people living in the residential neighborhoods around the UCSF Parnassus Heights campus, and by extension, the quality of life of the people of San Francisco. Forty years ago, the Inner Sunset Action Committee (along with the Sierra Club, San Francisco Tomorrow, and other plaintiffs) was the lead plaintiff in the law suit regarding the lack of compliance by UCSF with the California Environmental Quality Act (CEQA) in the construction then under way of two major UCSF building expansion projects -- the UCSF Long Hospital building expansion of Moffitt Hospital and a new building for the UCSF School of Dentistry.

The plaintiffs successfully prevailed upon the court to issue an injunction which ordered UCSF to cease all construction (at that time valued over \$80,000,000) of these two projects pending the resolution of the law suit. The UC Board of Regents took action to resolve this impasse by recognizing the grievances raised by the neighboring San Francisco communities and agreeing to:

- 1) Sell back to private individuals the many single family houses on Third Avenue in the Inner Sunset neighborhood which previously UCSF had seized by eminent domain and had evicted families from their homes.
- 2) Place a maximum ceiling of 13,000 persons on the daily population at the UCSF Parnassus Heights campus.
- 3) Place a maximum ceiling of 3,000,000 square feet on the floor area of all buildings located at the UCSF Parnassus Heights campus.
- 4) Scrap the plan to demolish the row of single family houses previously seized via eminent domain and located on the east side of the block on Fifth Avenue between Parnassus Avenue and Kirkham Street.
- 5) Preserve in perpetuity the open space on Mount Sutro.**

UCSF expansion projects also created great controversy in the residential communities of San Francisco surrounding the UCSF Laurel Heights campus. Once again UCSF failed to report adequately and completely describe the significant adverse environmental impacts in the Environmental Impact Report prepared for the UCSF Master Plan of the UCSF Laurel Heights campus. More specifically, the EIR failed to disclose that research experiments for biological warfare would be performed for the Department of Defense and carcinogenic waste would be incinerated on campus and exhausted via roof top stacks into the westerly winds blowing over the rest of the city of San Francisco. Laurel Heights Improvement Association sued UCSF for violating the CEQA which was opposed by UCSF up to the California Supreme Court which ruled in favor of the Laurel Heights community (see Laurel Heights Improvement Association vs. Regents of University of California (1988) 47 Cal.3rd 376).

The Draft EIR for the Mount Sutro Management project omits repeatedly information about the community controversy and resulting litigation due to UCSF failing to comply with the CEQA as follows:

Page 2-1 Summary “failure to identify areas of controversy”

Page 2-10 Topics of Known Concern - not noted

Page 3-1 Project Location and Surrounding Uses - UC Regents agreement not noted

Page 4-1 Discussion of neighborhoods in the environmental setting omits discussion of controversy

Page 4.1-11 Section regarding “University Guidelines” omits UC Regents agreement noted above

Page 4.4-13 Section on history of Mount Sutro notes it was a Nike battery weapons site but fails to disclose that after the weapons site was abandoned by the Department of Defense, the site was used to store caged animals being warehoused prior to the animals being transferred to the laboratories on campus below for experiments.

In order for the Draft EIR for the Mount Sutro Management Project to be adequate and complete in compliance with the California Environmental Quality Act, the Draft EIR should be corrected to include the above noted omissions.

Yours truly,

*John Bardis*

John Bardis

**From:** Stephanie Bautista <snbk84@gmail.com>  
**Sent:** Tuesday, March 19, 2013 8:47 AM  
**To:** Campus Planning - EIR  
**Subject:** Sutro Forest

Dear Diane Wong,

Several weeks ago, I was driving to work early one foggy morning. As usual, I was driving up Clarendon and the fog became particularly thick. Then, within the fog I noticed something unusual in the road. There, poised in the center of the lane was a coyote. Instantly, I felt relieved that I had not been driving fast. It stood in the road for several seconds, and then it carefully crossed over to the other side and disappeared into the woods.

I realize that this story may be of little interest to you and that you have, no doubt, been inundated with personal stories and angry letters attempting to discourage and derail UCSF's planned Mt. Sutro forest clearing project. I do not wish to bore or bother you, but I cannot sit idle knowing that there is a plan in place to destroy the natural beauty which I have the privilege of living near and of witnessing on a daily basis. San Francisco's Mt. Sutro forest is a beautiful oasis of plants and wildlife in the center of a city that quickly being transformed into a concrete wasteland. It is my sincere hope that UCSF will truly act as stewards to the land that it owns and do what is best for this environment that we share and the wildlife that inhabit the area.

Thank you for taking the time to read my letter. I am eager to know UCSF's final decision regarding this topic.

Sincerely,  
Stephanie

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144 Locksley Ave.  
San Francisco, CA

**From:** Michael J. Bertinetti <mjb@severson.com>  
**Sent:** Tuesday, March 19, 2013 1:05 PM  
**To:** Campus Planning - EIR  
**Subject:** Mt. Sutro

Gentlemen,

Please let the trees be, or at least do an honest job of thinning them.  
I don't doubt that a few must be removed for safety purposes, or because they pose an actual risk of harm.

But I'm dead set against the " native plants only" puritanism that seems to have seized some public officials . What is the difference between this botanic cleansing mindset and the ethnic cleansing of the Balkans not so many years ago – or of the Sudan and other areas today ?

All trees have beauty, and all take a long time to grow.  
Don't kill the things that give this City life.

Sincerely,

Michael J. Bertinetti  
19 Encline Court  
San Francisco CA 94127



**From:** Rk Bose <fk94131@yahoo.com>  
**Sent:** Tuesday, March 19, 2013 2:03 AM  
**To:** Campus Planning - EIR  
**Subject:** Comments on the Sutro DEIR  
**Attachments:** Comments on the Draft Environmental Impact Report - RKB.doc

Dear Diane,

I am submitting my comments on the DEIR in this email. I appreciate the effort that has gone into building this document, but I regret to say it minimizes the far-reaching impact of the project, sometimes with the use of erroneous data.

This is most egregious in the case of four issues:

- 1) The description of the fire hazard, where the referenced maps are the ones that FEMA \*has already noted are wrongly interpreted\*. After speaking with a CALFIRE Wildland Fire Scientist, FEMA confirmed that the CALFIRE map was the appropriate one to use. In discussing the increased fire hazard post-thinning, the DEIR claims there was no increased fire incidence on post-eucalyptus Angel Island. Nothing could be less true; pre-felling, there is a record of one \*structural\* fire; but after the felling, there have been numerous grass and shrub fires, culminating in the one in October 2008 - which again was a grass fire that destroyed hardly any trees.
- 2) The calculation of carbon sequestration appears to have been under-estimated substantially, perhaps by a factor of 3 or 4. Long-term projections of restored storage are speculative and optimistic.
- 3) The use of herbicides. In the worst-case scenario, UCSF would be using more herbicides on 80% of the forest (49 acres) than the Natural Areas Program used in its worst year, 2012. According to the calculations provided in the DEIR, it would use between 5 and 15 times as much.
- 4) The health of the forest. There appears to be a significant misunderstanding about the nature of the forest. The health assessment relies on a 1999 Hort Science study whose main concern regarding the forest was that young trees were not being recruited into the canopy. Instead of adopting the simple suggestion - of filling gaps in the canopy by clearing young trees in canopy-gap areas of vines - the Plan actually plans to gut the forest and make huge holes in the canopy. There are also references to pests that may infest the eucalyptus, but no hard evidence that they do, nor any credible identification of these pests. As against that, two Certified Arborists and a professional forest ecologist have declared it a thriving forest and ecosystem.

I've attached a document with details.

Sincerely,

Rupa Bose  
(webmaster, Sutroforest.com)

Chapter 1.

1.1. PURPOSE OF THIS DOCUMENT

One of the purposes of EIR is stated as follows:

"To inform the general public, the local community, and public agencies of the nature of the proposed project, its potentially significant environmental effects, feasible measures to mitigate those effects, and its reasonable and feasible alternatives."

The DEIR is quite specific about the complete project: The extension of a 30-foot spacing between tree-trunk to a total of 44 acres of the forest, a 60-foot spacing between tree-trunks over 2 acres of the forest, and no tree removal on 15 acres of the forest.

It does not specify a time line, beyond stating that the Demonstration Projects #1 - 3 would be implemented in the first year, taking 2-10 days each; and Project #4 in the second year. Then the same management action (i.e., 30-foot spacing of trees, removal of 90% of the understory, and amputation of vines to 10 feet above the ground) would be extended throughout the Reserve for a total of 46 acres. It is not specified when this action would start (though presumably it could be as early as Year 2), and it is described as taking place over "many years" (though it does not specify how many).

However, UCSF has also stated in subsequent published documents, "There is no plan to cut down 30,000 trees in the Mount Sutro Open Space Reserve, and it is unfortunate that this misinformation continues to spread." It continues, "The California Environmental Quality Act (CEQA) requires UCSF to examine what the maximum impact of the most aggressive management practice contemplated would be in its Environmental Impact Report (EIR) of the Reserve, so someone may be confusing the report with a final forest management plan."

Clearly, the most aggressive action that could be contemplated would be clear-cutting the whole forest; but that is not actually the Plan. If the Plan is not to extend the same management action to cover 46 acres, the DEIR should be revised to consider the actual plan.

**This statement confuses the issue of what exactly is being examined by the DEIR, and thus vitiates its purpose of informing the public and agencies about UCSF's proposed project.**

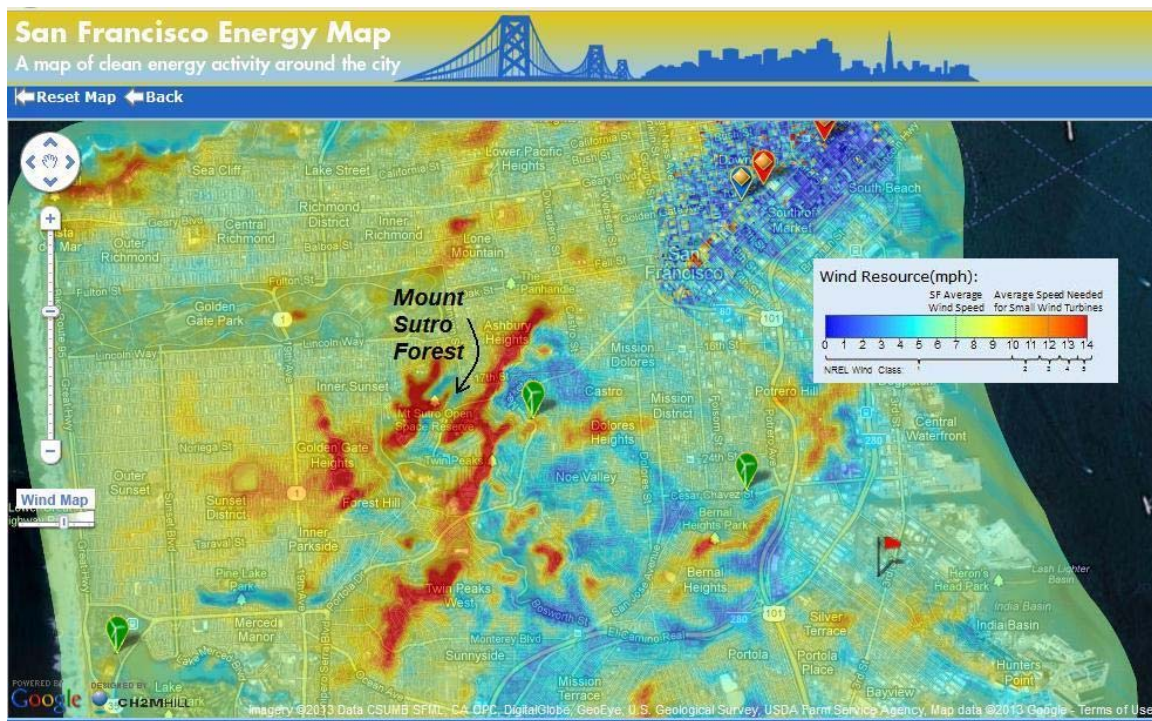
**This is further exacerbated by UCSF's publicizing statements based on the DEIR as "misinformation."**

## 1.4 SCOPE OF THE EIR

The scope of the EIR fails to consider the impact of felling 90% of the trees that rise 100-200 feet above Mount Sutro's ridgeline in a solid block on the microclimates elsewhere in the city. This has the potential to impact not only wind patterns as far away as Noe Valley or the Mission or other neighborhoods in the city.

Moreover, it would impact not just the wind but the fog. The forest blocks the marine layer when it comes at a low level, and furthermore, it drains moisture from this layer. Removing 90% of the tree-barrier could allow more fog through to the neighborhoods inland of the mountain, affecting the microclimates in terms of humidity and sunshine in those areas.

The final EIR should examine wind patterns and fog patterns not just on the mountain and immediately surrounding neighborhoods, but all neighborhoods that could potentially be impacted. That would include (but may not be limited to) Noe Valley, Dolores Heights, Castro, Mission, and Bernal Heights: see wind map below.



## Chapter 2: Executive Summary

### 2.1 PURPOSE

"The demonstration projects would include a range of potential management actions that could later be implemented throughout the entire Reserve."

This implies that the 4 projects show different management actions for comparable areas. In fact, each of the areas is different, but the same actions are planned for 5 of the 7.5 acres (Projects #1 and 2). In each case, trees will be felled to achieve a spacing averaging 30 feet between trunks; 90% of the understory will be removed; and the vines will be cut off at 10 feet above the ground, killing them. Project #1 on 3 acres is the only one that apparently has a demonstration component but that is mainly in different methods of re-growth prevention. It will demonstrate the results of tarping; pesticides, and mechanical removal/ goat grazing.

Two of the areas (Projects #3 and #4) appear to be implementations in the guise of "demonstrations."

Project #3, an area of under 0.5 acres, is to preserve an existing Nootka reed grass area and remove trees to prevent shading. **This is clearly an implementation.**

It may also be a misguided one. The Jepson Manual describes it as a grass of "Wet areas, beaches, dunes, coastal woodland" and Wikipedia notes "Coastal roadsides in Mendocino County, California can have populations, often receiving fog drip under Eucalyptus stands." It would seem that the grass is nurtured by the moisture provided by the eucalyptus forest, and it functions as part of the forest understory. This would suggest that removing it would be counterproductive.

Project #4, an area of 2 acres, is to be reduced to 12-15 trees per acre, to allow for planting of redwood, willow, bay trees and native shrubs and plants. **Again, this is clearly an implementation, not a demonstration, since other conversion plantings are not planned - except possible 1.5 acres of oaks, which would be entirely different.** The DEIR notes "Conversion planting in the East Bowl corridor would be completed as part of Demonstration Project #4."

Projects #1 and #2 appear to demonstrate nothing other than the \*visual impact\* of the Management Actions. They do not demonstrate increased forest health or reduced fire hazard.

### 2.2.3 TRAILS

Though three new trails are proposed as part of the project, the "Quarry Road Trail" appears to have been implemented in November 2011 without any notice to neighbors and prior to certifying the EIR. Its planned existence was not discussed during the community meetings or the scoping meeting, which took place prior to its implementation. Neighbors were not informed prior to its implementation, nor after it was built.

Ironically, it cuts through the proposed "Hands Off" area. Figure 3.5 (page 3-11) which indicates the locations of the proposed Demonstration Projects does not show this trail. However, Figure 3.6 does. A comparison with UCSF's 2010 report clearly indicates that the Quarry Road Trail is the upper portion of the proposed Christopher South Ridge Trail.

The planned extension of the trail to Clarendon Avenue will further reduce an already thin screen planting between the Forest Knolls neighborhood and the Aldea Student Housing. Since it will run parallel to Christopher Drive, a neighborhood street with little traffic, it is essentially superfluous.

### 3.2 CONDITION OF THE FOREST

The DEIR claims the forest is unhealthy, with overcrowding, dying trees, and an infestation of various insects including of snout beetles in some areas.

According to statements from two Certified Arborists and a professional ecologist, the forest is a functioning and thriving ecosystem. Both these documents are available on the SaveSutro website. See the following links:

<http://sutroforest.com/2013/02/13/is-ucsfs-sutro-forest-actually-unhealthy/>  
<http://sutroforest.com/2013/03/14/sutro-forest-statement-by-dr-joseph-mascaro/>

### CONTRADICTIONS

The DEIR states that the forest is crowded because eucalyptus is well-adapted to the site, it's very prolific, and re-sprouts vigorously. This does not sound exactly like ill-health. Though the forest has a density of around 740 trees per acre, and most of those are young, small trees, the forest is described as unable to regenerate.

Going back to the 1999 Hort Science report clarifies. It appears that the issue is that when a large tree falls, opening a gap in the canopy, younger trees do not grow rapidly to fill that space. The report attributes this to the suppressing effect of ivy. The solution it proposes is a lot simpler than cutting down the forest: Where such a gap opens up, nurture smaller trees by removing the ivy on and around them until one of them fills in the gap.

However, that report was written in 1999, when there was a widespread belief in California that eucalyptus trees only had a 100-year life-span. (As late as 2000, the San Francisco Chronicle described the forest as "dying of old age" based on interviews with Craig Dawson - now Executive Director of the Sutro Stewards, and with a UCSF gardener. See: <http://www.sfgate.com/default/article/Sutro-Forest-Dying-Old-age-hits-S-F-woods-3238712.php> ) In that situation, concern seemed reasonable: The forest was already over 100 years old, and fears of increasing tree failure were based on that now-outdated expectation.

We now know that eucalyptus in fact lives for 400-500 years in wet condition like Mount Sutro. [Reference: "*Eucalypt ecology*" by Jann Elizabeth Williams, John Woinarski (Cambridge

University Press, 1997): "... it appears that individual stems of eucalypts can reach between 400-500 years in Southern Australia...]

Though some trees may die and fall owing to self-thinning or windthrow, the forest itself is not dying of old age. Recruitment into the canopy thus becomes a non-issue, since the existing canopy is sufficient. Furthermore, if the issue of "ill-health" is that young trees are not being recruited into the canopy even when gaps open up, a plan to fell all these young trees and open huge gaps in the canopy appears perverse.

The DEIR goes on to say that the conditions in the Reserve have deteriorated, based on reports from hired arborists. "Dense spacing and predominance of small trees continues today. More trees are in decline, sapling health remains poor, and fuel loads have increased." **However, the report does not substantiate this.** In fact, as we mentioned earlier, two Certified Arborists and a professional ecologist have stated that the forest is thriving and healthy.

The so-called "deterioration" appears to be the natural process of Self-Thinning.

*"The principle of self-thinning is most easily described by the temporal changes that occur in the numbers of trees in undisturbed even-aged stands. However, self-thinning also occurs in uneven-aged stands... Trees at a competitive disadvantage die from crowding and suppression as stands approach a limiting number of trees of a given average size that can coexist within an area."*  
(Faculty of Forest and Nature Conservation, U-Cursos)

The last detailed assessment of the forest was made in 1999, by Hort Science. Though the DEIR claims that two arborists hired subsequently reported a deterioration in conditions, they haven't actually documented anything. **Now, 13 years later, the DEIR still uses Hort's estimate of tree density and tree numbers: 740 trees per acre, and 45,000 trees in total. This suggests that the deterioration is insignificant.** If indeed it is significant, this DEIR may be invalid, since all calculations are based on these estimates.

It also "spins" Hort's report as follows: "the general condition of the Reserve's trees is only fair to good, but the prevalent small trees throughout the forest are generally in worse condition than the large trees that dominate the forest canopy."

Here's what Hort actually wrote: "In general, the trees that make up the canopy were in good condition. Trees in the understory had generally poor health."

Hort's report sounds like a forest in the process of self-thinning. The trees that win the race for light flourish; the others survive or die depending on their specific circumstances.

Some trees – especially the thin saplings that have not reached the canopy – are dead or dying. The natural process of self-thinning is preferable to the artificial thinning proposed in the Plan, because the forest varies greatly in terms of topography, wind, temperatures, and other growing conditions. The trees that flourish are best adapted for that particular space.

If the forest is considered as a naturalized forest, it will be seen as healthy and self-regulating; it's a population of trees in various conditions. Only if it's considered a plantation – or still worse, an invasive species – does it make sense to intervene aggressively.

There is a reference to "possible" tree-borers that have not been seen; and a personal communication regarding Snout Beetles. If the latter do occur in the forest, then it would imply this pest has reach San Francisco, which would be surprising. In any case, they are readily controlled by a parasitic wasp, and if UCSF has indeed positively identified the beetles, it should state whether it has implemented this control.

However, except for major infestations, it's normal for a forest to have insects. They are part of the ecosystem, in fact, the foundation of it. Plant-eating insects form the base of the food chain for birds and animal life.

#### 4.1 AESTHETICS

The DEIR notes that the view of the forest is "dominant and stands out in the landscape, particularly when viewed from the north, east and west. However, the view from the South is extremely important; it is the dominant view of the forest as seen from Twin Peaks and from Mount Davidson.



It states that the impact on views will not be significant, but then admits that the view from the South could be noticeably impacted by Demonstration Area #1. The view from Tank Hill - especially after the Interior Greenbelt implementation of removing 140 large trees - will be adversely affected by Demonstration Project #3.





These changes cannot be pretended into insignificance.

## MISLEADING PICTURES

The DEIR avoids showing mock-ups of what the forest might look like after its Plan is implemented. Instead, it shows two sets of Before and After pictures eucalyptus trees elsewhere, provided by hired urban forester, Ray Moritz. (Page 4.1-15 and 4.1-16 of the DEIR.)

### *Highway 1 "13 Curves", Point Reyes National Seashore*



**Before**

Source: Ray Moritz



**After**

**Figure 4.1-17**  
Highway 1 "13 Curves" Project

The pictures show a forest with understory removed, **but the trees in those pictures are clearly not spaced 30 (or 60) feet apart.** They appear to be spaced 8-10 feet apart, similar to the average spacing in Mount Sutro Forest now. (Given 740 trees per acre, it's 8-9 feet apart.)



### *Camino Del Canyon, near Muir Woods National Monument*



Before

Source: Ray Moritz



After

Figure 4.1-18  
Camino Del Canyon Project

Both “after” pictures still include small-diameter trees of the kind that would be eradicated under the Management Plan. So what the pictures actually represent is how the forest might look without its understory, vines, or epiphytes – but without any tree-felling.

## 4.2 AIR QUALITY

The DEIR examines the air quality impacts from the equipment used in this project. It does not consider the effect of removing thousands of trees and nearly all the understory of the forest. Trees and bushes are a significant source of pollution control. This forest is surrounded by roads and urban structures, all of which are sources of pollution.

This impact should be evaluated and published in the final EIR.

## 4.3 BIOLOGICAL RESOURCES

The animal section of this DEIR is essentially speculation.

It is based on two visits to the forest, presumably in the daytime though the forest is used nocturnal wildlife also. No camera traps were used, daytime or infra-red. No seasonal studies were made although the DEIR has taken two years, allowing ample time for year-round studies of animal use.

As an example of an egregious error - it speculates that deer may be present, when it is known that they are not. No deer have been sighted within city boundaries. However, rabbits are known to occur, as are foxes; but no attempt was made to determine if they use the forest.

The Insect section is *entirely* speculative. The consultant apparently observed no insects at all. Its report then makes several speculative statements, which are not based on fact.

(a) "Native insect within the Reserve is expected to be low because of the dominance of non-native eucalyptus." This implies native insects (the vast majority) prefer native plants. However, research has shown this to be untrue.

(b) It lists possible insect fauna as "moths, flies, and beetles." First, these classes are ridiculously broad since there are 350,000 described species of beetle alone.

<http://evolution.berkeley.edu/evosite/evo101/VIIB1bBeetles.shtml>

Then, the list does not include insect species that are known to use the forest, such as butterflies and arthropods.

(c) Finally, it speculates about the possible presence of two species of eucalyptus borer - and then further speculates that they could kill trees. This is clearly an introduction of bias into the Report, since these insects were not observed.

Amphibians and Reptiles - they didn't see any. They merely guessed at what might be there.

Birds. Here they actually observed some birds. Again, with birds especially, a year round survey would be important, since some are resident and others migratory; and use patterns can change during mating, nesting, and fledging seasons. However, of note is that an olive-sided flycatcher - a species of concern - was observed where Demonstration Area #4 meets the Interior Green belt - where 140 trees are to be cut (presumably in addition to the 50 that were removed after the trail building). Its breeding is, according to the report, severely constrained by common raven predation. The DEIR does not note that substantial tree removal in the area will make nests even more vulnerable to ravens, by providing less cover and shelter.

The section on Mitigation contains significant flaws.

It speculates that bats roosting in trees being removed would fly away and roost elsewhere. This ignores two factors. First, the removals would occur during daylight hours, when the bats would be asleep, and they may not have time to escape. Second, a nocturnal animal forced into daytime flight is extremely vulnerable to predation from raptors and corvids. If such a bat were to fly, it would be unlikely to survive.

The DEIR claims it will avoid tree-felling in the winter period (October - February) when Monarch butterflies might be present, and mark any possible sites in December or January and avoid removing them until the butterflies are gone.

However, this will remove possible wintering sites for future seasons.

Tree- removal is also to be constrained by the bird breeding season (roughly February 15th through August 15th. In fact, birds may nest earlier or later depending on the climatic conditions that year. The mitigation states that a biologist will look for nesting birds. While this may succeed for raptor nests, which are large and visible, it will be very difficult or impossible for small birds such as hummingbirds (which have nests the size of a quarter) or cavity-nesting birds. If the quality of surveillance is similar to that in the DEIR - two daytime site visits, the results are likely to be derisory.

Moreover, it does not address the issue of destruction of nesting sites and cover for future seasons, thus reducing the habitat value of the forest altogether. This will be a very significant impact, given that 90% of the understory is to be removed, as also the vines; and of course, 90% of the trees on treated acreage.

On page 4.3-20, the DEIR claims the forest is not a wildlife corridor because it's surrounded by urban development. In fact, if viewed from an animal's viewpoint, it is part of a system that connects to a broader area - Glen Canyon, Twin Peaks, Laguna Honda Reservoir, and Golden Gate Park. It says "the relatively limited amount of vegetation removal... would not interfere..." The loss of 90% of the understory (which is what matters most to non-flying wildlife) is not "relatively limited."

#### 4.4 CULTURAL RESOURCES

The DEIR states that even after "continued implementation" the Reserve would maintain the look and feel of a forest - even though it would have been "thinned" to 10% of the existing trees on 3/4 of the Reserve. A 30-foot spacing (or 60-foot spacing in case of the East Bowl) is more like the spacing of street trees. With the removal of most of the understory, this would resemble a "parklike setting" as described in the pre-scoping community meetings. **(Though the descriptive language was changed from "parklike" to "forested", the actual management action was not.** This is another example of lack of good faith in putting together this project.) Hence, the DEIR must conclude that the impact would be Significant.

#### 4.5 GEOLOGY AND SOILS

The DEIR claims that the stabilizing effect of the root system will not be vitiated. The roots of dead trees, it claims, will take 5 years to die (despite tarping stumps) and thus lose their strength and holding power. Meanwhile, it claims, the 10% of trees remaining would expand their root systems rapidly, such that they would take the place of the dying roots of the felled trees.

This is a far-fetched claim for several reasons. *First*, on at least one acre, and potentially across the reserve, the plan is to poison the stumps. The objective of the poison is in fact to kill the root system of the poisoned tree so it does not re-sprout. This would mean that no 5-year interval exists. *Second*, there is no evidence that the remaining trees would experience such rapid growth in their root systems; indeed, they are more likely to be stressed by wind, and thus grow slowly if not actually be subject to windthrow. *Third*, the DEIR does not discuss the likelihood that the roots of these century-old trees are intergrafted, as has been stated by UCSF's hired arborist. This would mean that instead of being competitors they are networked with each other, providing both physical support and nutrients. This would imply much less growth from "release" and would also risk the herbicides going into the root system and weakening it, and possibly killing or weakening non-target trees - and making the remaining trees more vulnerable to windthrow.

The final EIR should state that the risk of landslides from tree removal is Significant in sloping areas - nearly the whole of the forest.

## 4.6 GREENHOUSE GAS EMISSIONS

With global warming, carbon storage is an increasingly important issue. California has a specific law about it: AB32. UCSF also has a policy to reduce greenhouse gases.

Eucalyptus trees are excellent carbon sinks: They grow large and fast, the wood is dense, and they're long-lived in wet conditions like Mount Sutro (around 400-500 years). The acacia understory makes the forest even better at sequestering carbon; acacia is a nitrogen-fixing tree, so both the eucalyptus and the acacia grow better together. They also store more carbon in the soil. Felling trees stops them from drawing more carbon from the air; instead they'll be chipped and mulched and decaying – and thus releasing carbon.

The DEIR makes numerous mistakes as it attempts to reduce the impact of felling thousands of trees to insignificance.

First, it underestimates the carbon stored in the forest, and continued sequestration. **This underestimation could be as low as a third to one-quarter of actual storage.** Six errors in method:

- It uses calculations based on six tiny cherry-picked plots (one-tenth of an acre each) that had fewer and smaller trees (averaging 175 trees per acre instead of 740 trees per acre for the whole forest!);
- It calculates the tree-loss per acre based on the 175 trees/ acre and estimates 62 trees per acre will be left standing – so only 113 trees per acre are felled instead of 678
- It excludes all trees under 5 inches in diameter;
- It excludes understory vegetation because it's only 5% of the total carbon storage;
- It ignores soil storage (about 50% of a forest's carbon storage) because it's stable, even though the kind of activities planned for the Reserve would undoubtedly cause soil disturbance and release carbon; and
- It uses a calculation based on 40% of the wood from felled trees being used for timber (as for furniture or lumber) – which of course means the carbon is stored for a much longer time than if the tree is in woodchips decaying on the ground. It reaches a conclusion that the short-term reduction in carbon storage would be 29% of the forest's total storage – 11,286 tons (or 10,239 metric tons) of carbon dioxide.
- It argues that mature trees have stopped sequestering carbon, while young trees would absorb carbon at higher rates. This is only true if trees stop growing; but there's no evidence that these trees have. They are young for eucalyptus trees, which can live 400-500 years. In fact, since trees absorb carbon in proportion to the wood they add, the larger trees may be absorbing carbon at a lower *rate* than small trees, but actually taking in a larger amount.

Second, it looks at a 30-year scenario (the projected life of the Plan), and divides the carbon storage loss by 30. We are not sure where the 30-year project life comes from.

Third, it argues that over 30 years, the carbon storage capacity will recover. The trees will be thinned the trees that remain will be healthier and grow larger, (despite the risk of wind throw killing remaining trees, and destruction by herbicides through the intergrafted root system).

Because the understory will be destroyed, they say, new trees will be able to grow (despite the thick layer of eucalyptus chip mulch and the plan to poison them or yank them to prevent them from growing.) It also claims reduction in tree mortality because there'll be fewer pest infestations (which don't actually exist now, but are speculated about). These conditions are unlikely to occur, and the lost carbon storage - and the capacity to add to it - will be permanently lost.

The DEIR compares normal levels of tree mortality associated with storms and self-thinning (and which would number tens or hundreds of trees) with the massive "thinning" that is proposed for a relatively short period of time (possibly as little as 4-5 years). Though there is no quantification of this ongoing normal mortality, the differential is likely to be 2-3 orders of magnitude. This is ridiculous.

## SNOUT BEETLES

The DEIR mentions an infestation of snout beetles. The DEIR does not make a definite identification, instead relying on a personal communication from an arborist (not an entomologist). UCSF should have an entomologist provide identification, because snout beetles have mainly been seen in Southern California and have not been known in San Francisco. In any case, they are readily controlled through release of a parasitic wasp. This UC Davis publication has details: <http://www.ipm.ucdavis.edu/PMG/GARDEN/PLANTS/INVERT/eucalsnbeet.html>

If UCSF has verified they are Snout Beetles, the EIR should specify whether the wasps have been obtained and released. If not, it should specify why this obvious measure has not been taken. Otherwise, the public will be forced to assume that UCSF has no intention of protecting the trees.

In any case, speculative pests that do not appear to be damaging the forest are not a good basis for comparison. The Hort Science report notes that most tree-failures are associated with storms and does not mention any unusual pest activity.

## CARBON AND FIRE RISK

The DEIR argues that the Plan reduces the fire risk, and thus the risk of carbon release owing to fire. First, the Plan will increase, not reduce, the fire risk. Second, the carbon release from a speculative fire cannot be used as a benchmark.

## CUMULATIVE IMPACTS

The DEIR claims no other large projects were identified. In fact a very significant amount of tree-felling is likely in San Francisco from (1) the Significant Natural Areas Management Plan and (2) Forestry actions funded by the Parks Bonds of 2008 and 2012. In addition, major tree removals are planned for the East Bay and in Pacifica. The final EIR must take into consideration the possibility that all these projects will occur within the same time-period.

## 4.7 FIRE HAZARD

## FOREST CONDITION

The DEIR also includes pictures of the canopy which it characterizes as sparse and unhealthy. This again reflects a misunderstanding of the forest and the species. This is actually the natural canopy of a healthy eucalyptus forest, which is airy and not very dense, thus allowing for a subcanopy of smaller trees (acacia, plum in Sutro Forest), and a lush understory.



For comparison, we show a stock photo of an Australian eucalyptus forest (Australian eucalyptus forest. Photo credit: Tim Chen, 123RF Stock Photo) as well as the "sparse tree canopies" from Page 4.7-4 of the DEIR. This is actually a normal eucalyptus canopy. Source: UCSF



The pictures 4.7-1 and 4.7-2 do not show any significant deterioration or illustrate any point about sapling health, trees in decline, or "fuel load." Though the DEIR again asserts that conditions have deteriorated, it produces no quantification or evidence for this assertion.

## EXAGGERATED FIRE HAZARD, INCREASING THE RISK

The DEIR **exaggerates the fire hazard. The Management Plan** will actually increase the risk by making the forest much drier and windier. (Please refer to the statement of Dr Joseph Mascaro at the Feb 25th public hearing.)

The arguments in the DEIR repeat those in the FEMA application: Eucalyptus is uniquely flammable owing to shed bark and oils within the leaves; dense forests are more flammable than open ones; that fires in the forest in 1899 and 1934 indicate its vulnerability; that the fires on Angel Island and Oakland are examples of fires that could occur in Mount Sutro Forest; that hot dry northeast winds in autumn cause a period of vulnerability for "several weeks." **We thought we had already answered those arguments** in this post: [UCSF, Sutro Stewards, and the Fund-Raising Fire Hazard](#), and in this earlier post, [Mt Sutro: The Fire Hazard That Wasn't](#).

Sutro Forest is a de-facto Cloud Forest. (The argument about whether it should technically be called a Cloud Forest when it is not tropical or sub-tropical is beside the point. It **functions** as one, being wet year round.) It gets 30-40% more moisture than surrounding areas by catching moisture from the fog, which it then holds in its duff and understory. ***This may be the wettest part of the city that isn't actually under water.***

The DEIR argues that fire spreads more rapidly through a diseased forest than a healthy one. This may be true when the disease is causing high rates of tree mortality or reducing the moisture content of the affected trees. However, there is no evidence that the forest is unhealthy; there is no evidence of disease; nor is there any credible evidence of pest infestations.

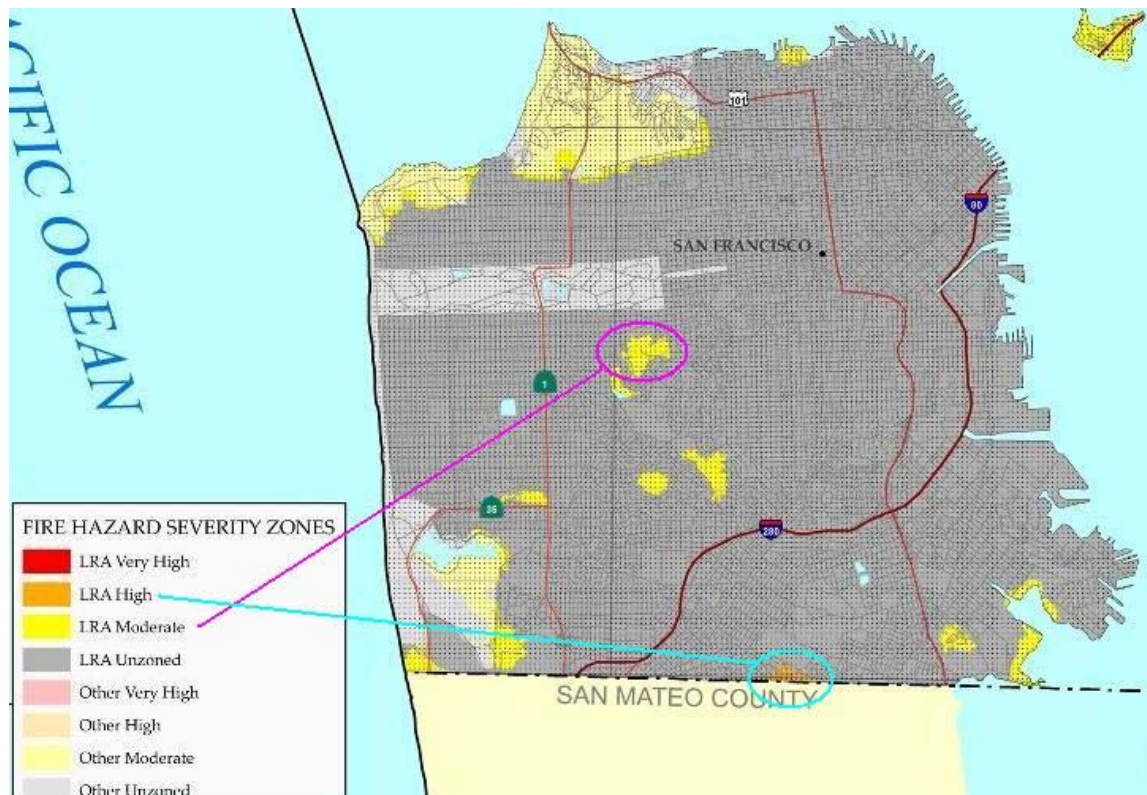
There is no evidence that monocultural forests are more susceptible to wildfire, nor can any logical reason be imagined. The EIR should cite actual studies, not refer back to the 2001 Management Plan.

The NPS "Eucalyptus" pamphlet has serious credibility issues, having picked up a number of the myths about eucalyptus (including "beak-gumming") and being written with a Native Plant bias). It is not a credible information source.

The 1999 Hort Science report notes that the canopy trees are in good condition. The concern it expresses, as mentioned earlier, is with regeneration when those trees die. The simplest solution proposed was to nurture younger trees in spaces where the canopy had been broken by wind-throw of larger trees, and allow them to replace those trees. This would preserve the eucalyptus forest. The Hort Science report did not suggest either pest infestations or fire-danger. In fact, it stated "... ivy, blackberry and broom, the dominant understory species in the Reserve, will not ignite without first being cut and allowed to dry."

According to CALFIRE, the hazard rating for Mount Sutro Forest is **"moderate"** – **its lowest risk rating**. The DEIR seeks to dismiss this by saying the map is a draft and could change. However, CALFIRE also noted: ***"Update, 11/2008: CAL FIRE has determined that this county has no Very High Fire Hazard Severity Zones in LRA [Local Responsibility Area]."*** That covers Mount Sutro Forest. Clearly, in CALFIRE's assessment, there is no Very High Fire Hazard. The **added "update" is not a draft.**





The map referenced by the DEIR, though contained in the 2008 report actually referenced a map made by URS in 2005, "using CALFIRE's fuel ranking assessment methodology." In fact, in its letter questioning UCSF's application for fire hazard reduction, FEMA noted that UCSF "inaccurately interprets a map", "provides inadequate details regarding the history of wildfires in Sutro Forest, and provides a simplistic and ineffective comparison of the wildfire hazard in the Sutro Forest to the hazard in other areas that have burned in the San Francisco Bay area."



It notes that the CALFIRE map is the relevant one, and that shows the forest to be a “moderate” fire hazard – the lowest rating of the three that CALFIRE assigns.

#### 1. Clarify the Wildfire Hazard

In its response to provide a clarification of the wildfire hazard, UCSF inaccurately interprets a map, provides inadequate details regarding the history of wildfires in the Suto Forest, and provides a simplistic and ineffective comparison of the wildfire hazard in the Suto Forest to the hazard in other areas that have burned in the San Francisco Bay area. UCSF states that “the San Francisco Department of Emergency Management has adopted a CDF Wildfire Hazard Map as part of its Hazard Mitigation Plan, which confirms that the proposed project sites are in fact very high wildfire hazard areas.” This conclusion represents an inaccurate interpretation of the referenced map. Not only does the text of the Hazard Mitigation Plan that references this map state that the map illustrates only the extent and not the probability of a wildfire, the text on the actual map specifies that fuel ranks classify areas based not on hazard potential but on existing vegetation and anticipated fire behavior in that vegetation type. As explained by Dave Sapsis (CDF Fire and Resource Assessment Program (FRAP) Wildland Fire Scientist), “Fuel rank is only one of the two components used to get to future threat. The other is rotation rank which is an estimator for future burn probability.” The map provided by UCSF illustrates expected wildfire behavior, but omits any estimate of fire likelihood, and because fuel ranks do not correlate directly to the full profile of a wildfire hazard, the map cannot be used to identify the hazard. A complete profile of the wildfire hazard in the Suto Forest will require the input of information on the probability for an area to experience appropriate conditions to promote a wildfire (ignition and weather/climate). The FRAP “Draft Fire Hazard Severity Zones in LRA” (FHSZ) map for the County of San Francisco more aptly characterizes the actual wildfire hazard in the County and City of San Francisco. As described by Dave Sapsis:

FHSZ differs from fire threat in the way fire probabilities were used, the way fuel systems were modeled for potential not current conditions, and how fuel systems influence the areas around them. Fire threat is a measure of in situ hazard, and doesn't include the influence of adjacent areas (either via flame spread or firebrands). This makes sense since fire threat was designed to characterize wildland fuel hazards, and FHSZ was designed to include those areas (as potential) and adjacent urbanized WUI [Wildland Urban Interface] areas as well.

The 2007 FHSZ map shows the Suto Forest to have a “Moderate” wildfire hazard. In the 2007 FHSZ map, “Moderate” is the lowest of the three fire hazard severity zones. The 2007 FHSZ maps can be viewed at this website, [http://www.fire.ca.gov/fire\\_prevention/fhsz\\_maps/fhsz\\_maps\\_sanfrancisco.php](http://www.fire.ca.gov/fire_prevention/fhsz_maps/fhsz_maps_sanfrancisco.php).

The Hazard Management Plan to which the DEIR refers states: “non-native plants may be more susceptible to burning than native species.” This statement is nonsensical, since “native” and “non-native” encompass a huge range of species with differing characteristics. Indeed, most native chaparral plants and grasses are extremely flammable. It also refers to “periods of prolonged drought” which do not exist on Mount Suto; the longest “dry spell” mentioned even in the 2001 Management Plan is “about ten days.” In a three-month observation period during autumn of 2009, a neighborhood-based group noted a dry spell of only 7 days (defined as days when the forest received no moisture from rain or fog).

If the EIR believes the window of ignition is extended, it should substantiate its claim with credible data.

The DEIR claims that CALFIRE's map is a “screening level map” and that the HMP map, using CALFIRE's methodology, is the more accurate map regarding fire hazard. However, the FEMA

letter (excerpted above) explains why this is not the case, and that is why UCSF "inaccurately interprets a map. The DEIR is incorrect in its claim that this map shows fire hazard.

Even so, the HMP identifies potential mitigation as follows: *"Implement a fuel reduction program such as the collection and disposal of dead fuel..."* However, the proposed Management Plan will kill living trees and plants, and leave the dead plant matter in the Reserve, either as mulch and chips, or as dead vines in the remaining live trees. This is exactly counter to the suggested management action.

San Francisco city **does not get hot dry northeasterly winds** (commonly called 'Diablo' winds); even when the East Bay has these conditions, the city remains cooler. According to the 2001 Plan, the vulnerability is for "up to ten days in the autumn." In 2009, we maintained a daily FogLog during this so-called 'period of vulnerability' and recorded only 7 dry days – i.e. days when neither fog nor rain provided the forest with moisture. **It will not dry out in 7-10 days in its natural state.**

**The fire hazard can be raised, however, by "thinning" the forest.** This will dry out the "thinned" areas, and increase wind-speeds, thus increasing the likelihood that fires will spread if they start. So far, there have been – we are told – 3 small fires, the last in 1999. It was extinguished in 20 minutes. Had the forest had been drier and windier, and had it been a fire of grass and shrubs, it could have spread rapidly as the Angel Island fire did.

In fact, both Angel Island and the Oakland fire are counter-examples. Angel Island was covered with eucalyptus trees for decades. During that time, the only reference we could find to fire was a fire in a building. Since the trees were removed, there have been a number of fires, culminating in the October 2008 fire – which burned the grass and shrubs and stopped at the tree-line. The DEIR claim that thinning occurred on Angel Island without an increase in fire incidence is incorrect based on the data.

The Oakland fire also started with shrubs and grasses. It spread to trees and buildings, but the trees were victims of the fire, not the cause of it. The main fire spread from house to house. A report on that fire is available at: <http://sutroforest.com/2009/08/08/no-tree-hazard/>. It also clarifies that eucalyptus is not particularly flammable.

The weather conditions in Oakland and on Angel Island are also completely different from Mount Sutro's. Both those places have more extreme and drier weather. Sutro Forest's uniquely wet micro-climate is not comparable – though once the forest has been thinned and dried out, the comparisons might be closer.

Evidence of this drying is visible in the Interior Green belt on the new trail from Stanyan where 50 trees were removed thus opening large gaps in the canopy. A lot of understory was also removed. The forest is visibly drier there than in the more enclosed parts. Though the DEIR says it's the South-facing slopes that are warmer and drier, it is the open areas on the east side that are dry now. A walk along the Historic Trail illustrates this as well – the path can change from dry dust to damp earth within a few inches, depending on the state of the forest. If the whole forest

is made as dry and dusty as these areas, by removing thousands of trees and nearly all the understory, the hazard could increase.

Incidentally, during the public meeting prior to that trail being built, Ray Moritz, who is UCSF's hired arborist, also made a presentation as a fire ecologist and declared the fire hazard to be low. This is from contemporaneous notes made following that meeting:  
<http://sutroforest.com/2010/02/09/low-fire-risk-and-the-historic-trail/>

#### 4.8 HERBICIDE USE

The DEIR plans for the use of herbicides glyphosate and triclopyr on Demonstration Projects #1 (and potentially #4), with a possible extension to 80% of the Reserve. Herbicides would then be used to prevent resprouting of the vegetation for up to 6 years and then used to help manage trailside vegetation.

The DEIR considers this use "less than significant." However, given the quantity of vegetation to be removed over a relatively short period of time, pesticide use could far exceed any usage in San Francisco's Natural Areas. Based on the DEIR projections, after the first year, herbicide use in a total of 49 acres would exceed that of the Natural Areas Program (which is around 1100 acres) by a factor of 5 to 15 times the NAP's worst year thus far (2012).

This is extremely significant in comparison with the current status - the Reserve has been pesticide-free since 2008. The final EIR should note that this a significant impact that cannot be mitigated without avoiding pesticide use.

The city usage of pesticide is subject to notices and detailed record-keeping, which it makes available monthly on request. UCSF should - if it proceeds with the Plan - use the same system.

**From:** Rk Bose <fk94131@yahoo.com>  
**Sent:** Tuesday, March 19, 2013 2:49 PM  
**To:** Campus Planning - EIR  
**Subject:** Second Comment on Sutro DEIR

Dear Diane,

This is in addition to my previous email comment on the UCSF DEIR (and my spoken comment at the Hearing on February 25th).

I would like to address the issue of the Alternatives to the Management Plan. The DEIR discusses two alternatives: No Project; and Reduced Project.

The "No Project" Alternative analysis appears to be flawed.

1) First, it proposes reverting to the Maintenance plan in place *\*before\** the proposed Management Plan, which apparently includes the limited use of herbicides. It is unclear whether the Management Plan date should be set at 2001, or the modified version of 2010.

Since there has been no use of herbicides in the Reserve since 2008, this limited use should be defined as zero use. If No Project is selected, there can be no reason for UCSF to re-start pesticide use after having stopped it nearly five years ago.

In any case, even if the benchmark was set at the level pre-2008, that level needs to be researched and described for comparison with the other alternatives.

2) Second, it describes the forest as declining, and raises the sceptre of a forest where all the large trees fall and no new tree is recruited into the canopy. However, since eucalyptus is long-lived, there is no reason to expect massive tree-failures of canopy trees, other than normal storm-related mortality. The simplest solution proposed in the 1999 Hort Science report can be implemented under routine maintenance - removal of vines from young trees that are potential canopy recruits where a gap opens up. Two Certified Arborists, and a professional ecologist have stated that the forest is healthy. (See below.)

The final EIR should correct these points. Since the No Project Alternative would then require the least disturbance to the environment, it would clearly be the Environmentally Superior Alternative.

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Statement of Dr Joseph Mascaro:

My name is Dr. Joseph Mascaro, **I am a forest ecologist at the Carnegie Institution for Science in Stanford, California.** Although I cannot be present at the meeting today due to prior travel arrangements, I asked Keith McAllister to read this statement on my behalf. *I wish to deliver my expert opinion as an ecologist, but please note that my views regarding Mt. Sutro are not endorsed by, or affiliated with, the Carnegie Institution for Science.*

**I have worked in forest ecosystems throughout the United States, as well as tropical forests in Central and South America, Oceania and Australia,** where I worked in forests dominated by eucalyptus and acacia species. Having experienced conditions in eucalyptus forests in their native habitat, I believe the management objectives of the draft environmental impact report by the University of California, San Francisco will have three significant and unnecessary negative impacts on the environment, and in light of these negative impacts, I strenuously object to the proposed management

activity.

**First, the management activity will increase—not decrease—the risk of fire.** The present microclimate of the Sutro forest is cool and moist, with predominately healthy trees. The forest promotes fog drip, and blocks wind. By thinning the forest and removing most of the understory vegetation, the management activity will open the canopy of the forest resulting in drier and hotter duff on the forest floor and a greater risk of fire.

**Second, the management activity will increase carbon emissions to the atmosphere.** In the report, UCSF justifies these carbon emissions on the grounds that, after the cutting, more eucalyptus trees will grow to accumulate any lost carbon. UCSF is disingenuous on its views regarding eucalyptus: they first suggest that it is bad because it increases fire risk, and then suggest it is good because it grows quickly.

**Third, the management activity will damage the biological diversity and character of Mt. Sutro.** The forest on Mt. Sutro is, indeed, a novel ecosystem with many introduced species. Yet it is a diverse, functioning ecosystem providing many services, the most interesting of which is that it provides a small piece of wild nature in the heart of our city. The forest is old, but it may not yet be mature. There is no forest perfectly analogous to what exists on Mt. Sutro – a cosmopolitan mix of species, much like San Francisco. The fact that the forest is strange to us is not a sufficient justification for destroying it.

**I urge UCSF to withdraw their management proposal.**

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Letter from Certified Arborist Alma Hecht:

I am a Certified Arborist and in 2010 with Certified Arborist Jocelyn Cohen evaluated Mount Sutro Forest. We saw a thriving forest. Here are some excerpts from our notes:

- Trees were well rooted along hillsides and flat areas.
- Visual evidence of a naturalized forest is obvious in trees' calibers that offer insight into age and health. Tree girths range from wide in oldest trees to narrow where the trees are younger, more closely spaced and/or receiving less sunlight.
- Poor management of the trees as evidenced by hanging branches and fallen/cut limb piles. Some lower branches were pruned; many cuts were improper leaving stubs or flush cuts into the parent stem.
- Snags (i.e. standing dead trees) were left in place—perhaps by happenstance — providing habitat for wildlife.
- Swaths of acacias establishing in areas of recent woodland removal for path expansions or other purposes.
- When thick carpet of forest duff pushed aside, the soil is very moist to several inches down. Yet, in places where paths have been expanded, the ecotone is becoming drier and dustier.
- Thriving mosses and lichens on rocks and tree-trunks.
- Epiphytes colonized in branch crotches.
- In many areas, climbing vines have been cut, generally at five-ten feet, left dry and dangling from branches in thick nets."

We also noted that it had the characteristics of a fog or cloud forest. Again, from our notes: "As is typical in [such] forests, trees are crowded. Branching is high. Understory is deep. Leaves drip. Some trees are mature and mighty with crowns beyond view. Others are rangy, young and low enough to meet eye-levels. 'In forest stands or in other mixed plantings, all trees do not grow at the same rate. Over time certain individuals dominate over others.' (Reference – Arboriculture: Integrated Management of Trees Shrubs and Vines, Richard Harris, Greg Steinke, James Clark and Nelda Matheny, Prentice Hall 2003.)"

As would be expected in a cloud forest, we saw it was drying out where it had been opened up: "In some areas with indiscriminate thinning and removal of trees, the ground is dry (compared with wet

conditions through most of the forest and even on the same trail). Those areas also seem to have higher wind velocities. Dry conditions are particularly noticeable at the Rotary Meadow where an existing clearing was replanted into a landscape of native plants. Significant differences in moisture conditions are visible.”

The forest appeared healthy, and we saw signs of regeneration in forest trees including eucalyptus. UCSF has suggested that the forest is dying and infested with beetles. Since it’s a living eco-system, a normal amount of insect life can be expected. But there’s no evidence of unhealthy levels of infestation, or of a moribund woodland. In particular, the eucalyptus snout beetle, mentioned as a threat to the forest, is not known to be present in San Francisco, being more a pest of Southern California eucalypts. And even there, it’s been well-contained with the introduction of a parasitic wasp.

We are also familiar with the forest on Mount Davidson, which has similar conditions. We think the different opinions stem from a fundamental misunderstanding of tree forms in natural, or naturalized, forests. Here criteria for gardens or timber plantations where the objective is to optimize individual trees for aesthetics or lumber is inapplicable. In either of these naturalized forests the trees comprise a whole entity, wherein some trees might flourish, others might die, but are essential to the living whole.

Trees in a forest – especially a dense cloud forest – tend to grow high and fast to reach the canopy, and do little branching until they get into the light. This results in trees that appear spindly and tufted, but in fact are healthy and well adapted to the place in which they are growing. A wet environment like Mount Sutro Cloud Forest (or Mount Davidson) can sustain a very high density of trees and vegetation. In any case, natural forests -and naturalized forests, like these- will “self-thin” – the trees that are unable to get enough nutrients or light will eventually die. When this happens, it is the weakest trees that eliminate themselves, and the strongest trees that remain. This results in a forest that is best adapted to the conditions in which it grows. Artificial tree removals for arbitrary spacing destroys the forest’s adaptive mechanism. Removing existing trees in these forests will not improve the forest’s health. In fact it will send the forest into decline destroying a healthy environmental treasure.

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Rupa Bose  
63 Forest Knolls Drive,  
San Francisco CA 94131

**From:** Arnita Bowman <arnitabowman@hotmail.com>  
**Sent:** Tuesday, March 19, 2013 4:20 PM  
**To:** Campus Planning - EIR  
**Cc:** regentsoffice@ucop.edu  
**Subject:** DEIR for UCSF Mount Sutro Management Project - Unethical Misrepresentations and Wasted Funds  
**Attachments:** Natural Forests Example - SF Peninsula Watershed Douglas Fir.reduced.pdf

Dear Ms. Wong:

This is my public comment on the Draft Environmental Impact Report (DEIR) for the UCSF Mount Sutro Management Project.

I am upset by the significant UCSF resources wasted on this costly restoration ecology plan and the unethical behavior of UCSF in misrepresenting the plan to the public as being about protecting public safety and restoring forest health. Also, the project is based on dogma – not science - regarding the superiority of native plants. It is shameful that a world-class scientific and educational institution is subscribing to nativism, is marginalizing the mental and physical health benefits of urban forests, and is demonizing the historic landscape.

UCSF has treated the DEIR process as a public relations event to gain public acceptance instead of a factual representation of the actual plan, its purpose, and the environmental consequences. See the misrepresentations [HERE](#). Most unacceptable and unethical is the communications from Barbara Bagot-López, Director of UCSF Community Relations in written communications and interviews with the public and the media. Below is the email that was sent to the UCSF Community List Serve distribution that highlights the misinformation perpetuate by UCSF. Her communications throughout the DEIR process attempt to hide the total tree removals and demonized eucalyptus forest as unhealthy and a fire hazard and is an obvious effort to marginalize community involvement in the DEIR review process.

Also it is unethical how UCSF has allowed the nativist bias to undermine the DEIR and to present a DEIR that is deficient in these regards:

- Ignoring the benefit of trees in absorbing urban air pollution.
- Assuming fires will destroy the forest and that native plants - with much lower biomass - will replace the carbon sequestration of the existing massive trees and dense understory.
- Ignoring that the risk of wildfire will increase by eliminating the windbreak, reducing moisture on the forest floor, and replacing the forest with more flammable native shrubs and grasses.
- Ignoring that UCSF's neighborhoods will have an increase in wind and noise from which they are currently sheltered by the dense forest.
- Ignoring that young forest trees self-thinning and regenerating is a natural and

healthy forest process.

The unique urban forest is healthy and dynamic and largely self-sustaining. The proposed thinning and standard tree spacing are not about tree health but aesthetics and non-applicable commercial forest standards. To highlight this point, I've attached several pictures taken in the old growth Douglas Fir forest in the nearby San Francisco Peninsula Watershed. The watershed is managed as a State Wildlife Refuge and the healthy old growth forest has self-thinning young trees and dense understory quite similar to the conditions in the Mount Sutro eucalyptus forest. It is unacceptable that UCSF would claim the 30 foot spacing is about "health" when it is really an aesthetic preference designed to create greater sunlight for native plants. This plan will only create an open woodland instead of the unique historic forest that that provides many health benefits and a healthy retreat from urban living. The nearby Twin Peaks and Grand View parks both offer scenic views comparable to those proposed by this tree removal plan but neither offer the unique deep forest experience of Mount Sutro. Surely, at least a public survey should be conducted to evaluate the recreational desires of the urban population before UCSF proceeds any further with the destruction of the largest urban forest in San Francisco.

UCSF is a public institution funded by taxpayers to educate medical professionals, provide patient care, and conduct bio-medical research. It is a violation of public trust for UCSF to fund a massive native plant restoration for a few native plant enthusiasts, particularly while the UCs are under extreme financial pressure and are increasing student tuition. These huge increases in tuition are impoverishing UC's students and crippling their futures with debt.

Please reconsider your unhealthy plans and maintain the beautiful and health providing forest in the heart of San Francisco.

Regards,

Arnita Bowman

Mount Sutro Hiker

San Bruno, CA





2013.03.16





2013.03.16





2013.03.16





2013.03.16





2013.03.16





2013.03.16





2013.03.16



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2013.03.16

Note: I am resending this public comment originally sent at 4:49pm on March 19, 2013 and also copying UCSF Community and Government Relations, in order to both ensure that the comment is established in the public record and to correct a slight text copying error in the original letter that included the phrase "Iestick Point-Hunters Point Shipyard Phase II Development Plan Project area before any development can proceed." near the end of the comment letter. Please disregard that phrase in the original communication.

To:

Ms. Diane Wong  
UCSF Campus Planning  
Box 0286  
San Francisco, CA  
94143-0286

Public Comment on the Draft Environmental Impact Report (EIR) for the UCSF Mount Sutro Management Project

Dear Ms Wong and other UCSF planning staff and decision makers,

I am writing to point out serious inadequacies, inaccuracies, and failures to adequately consult with and address the full scientific record, on both climate change and forest management, in the Draft Environmental Impact Report (EIR) for the UCSF Mount Sutro Management Project; as well as the underlying UCSF plan for management of the Mount Sutro forest and project area.

Specifically, the draft EIR, fails to account for, and respond to:

- 1) More up to date emerging science on the relation of forests and forest management to green house gas emissions (GHGs) and climate change, including the contribution of forest soil disturbance to GHGs
- 2) More up to date emerging science on climate change "tipping points" which are already being exceeded as of the writing of this comment, and which make an assessment of the impact of GHGs over the immediate year of the creation of those GHGs and over the next 5 to 10 years of paramount importance to addressing the global climate crisis

Important Note: While I will refer in my public comments to specific sections of the draft EIR which reference GHGs, in order to describe problems with the EIR, there are many other sections of the draft EIR in which there are similar problems because they reference the same subject matter, and all such sections of the draft EIR should be revised; not solely those to which I will specifically refer.

Here are my comments in detail to the points raised above:

**1) FAILURE TO ADDRESS AND ACCOUNT FOR MORE UP TO DATE EMERGING SCIENCE ON THE RELATION OF FORESTS AND FOREST MANAGEMENT TO GREEN HOUSE GAS EMISSIONS**

On pages 4.6-14 through 4.6-24 (pages 178 through 188 of the pdf copy of the draft EIR) and in other sections of the EIR, many references are made to the relationship of forest management to GHGs.

**Impacts Of Age And Disturbance Of Forests To Atmospheric Carbon Storage**

Some references in the draft EIR state that in forests where large scale tree and underbrush removal takes place, providing more spacing in those forests for younger and more rapidly growing trees to flourish, such forests will

store more carbon than older forests and old growth forests. However, emerging peer reviewed science on older, more established forests is showing that in fact the opposite is true, that even very old forest ecosystems store more carbon than younger forests, and that the more often forests are disturbed and or thinned, the less effectively they store carbon.

For example, see the following reports:

Forest Carbon Basics - presentation - (Harmon, Krakina, 2008)

[http://www.ecy.wa.gov/climatechange/2008FAdocs/8\\_20\\_08\\_\\_harmonforestcarbonbasicsv2.pdf](http://www.ecy.wa.gov/climatechange/2008FAdocs/8_20_08__harmonforestcarbonbasicsv2.pdf)

and

Old growth forests are carbon sinks for centuries, helping offset emissions

<http://news.mongabay.com/2008/0911-forests.html>

Important: To request the full source document reported on in the second article, see:

Old-growth forests as global carbon sinks - Sebastiaan Luyssaert et al

(2008) at:

<http://www.nature.com/nature/journal/v455/n7210/full/nature07276.html>

The clear conclusion reached from examining these and other such sources is that both the draft EIR and the Mt. Sutro management plan need to be extensively rewritten to address such new information being shown by researchers like Harmon and Luyssaert.

#### Impacts Of Forest Soil Disturbance On GHGs

Furthermore, the findings in the research of Harmon, Luyssaert and others are based partly on examination of the extensive releases to the atmosphere of CO<sub>2</sub> and other GHGs due to the disturbance of forest soils.

Therefore, the claim made in the draft EIR in section 4.6.3 on page

4.6-15 that "Consistent with other studies, carbon stored in the soil (greater than 50% of the Reserve's™ total carbon pool) was not measured; it was assumed to be at equilibrium over time and unaffected by the Alternatives." is highly suspect, and only a draft EIR and management plan which fully analyze all potential impacts of soil disturbance on GHGs are adequate or complete.

#### 2) FAILURE TO ADDRESS OR ACCOUNT FOR MORE UP TO DATE EMERGING SCIENCE ON CLIMATE CRISIS TIPPING POINTS WHICH INDICATES THAT ASSESSMENT OF IMMEDIATE NEAR TERM GREEN HOUSE GAS EMISSIONS IS PARAMOUNT IN ENVIRONMENTAL IMPACT REVIEW

A vast array of climate research and resulting reports from scientists has been emerging over the last decade which is pointing more and more to the alarming reality that as temperatures have been rising globally, unexpected feedback loops such as a) the increasingly rapid melting of ice triggering darker open seas to absorb and retain more solar heat and

b) the rapid increase and scale of permafrost melting which is causing the release of large amounts of previously trapped methane gas (a gas which is 20 to 100 times more potent a GHG than CO<sub>2</sub>) now necessitate a far more rapid and aggressive avoidance of releasing GHGs into the atmosphere and similar avoidance of the loss of carbon sinks such as forests. Such research and reports are suggestion that over the next 5 to 10 years the need to act immediately (and to not simply average GHGs over far longer periods of time) is particularly acute.

See:



<http://www.guardian.co.uk/environment/2011/nov/09/fossil-fuel-infrastructure-climate-change>

<http://www.dw.de/polar-ice-sheets-melting-faster-than-ever/a-16432199>

and

<http://www.unep.org/newscentre/default.aspx?DocumentID=2698&ArticleID=9338>

In light of such new and alarming reports on climate crisis tipping points, the assumption made in the draft EIR on page 4.6-21 that;

"To compare the reduction in the above-ground carbon sink to land use thresholds, the removal of the sink must be considered over the 30-year lifespan of the project. This is because the land use thresholds are developed for annual emissions while the removal of the sink is a one-time activity as opposed to emissions over a project's life-time. In order to compare a one-time activity to operational thresholds, the GHG emissions associated with land use, the impacts of the removal of the carbon sink must be amortized over the lifespan of the project (30 years). This decreases annual impacts from the sink removal to 376 tons, 341 metric tons, per year (11,286 tons divided by 30 years), which is less than the land use threshold of 1,100 metric tons."

is clearly fundamentally flawed. Therefore only a draft EIR and management plan which are revised to carefully consider, quantify, and in the case of the management plan avoid, the impact of the near term GHGs from the Mt. Sutro management project on immediate climate crisis tipping points are adequate or complete.

#### OTHER CONCERNS

Not that in the same way that new science is emerging which seriously questions previous assumptions of the efficacy of large scale thinning as a method to increase atmospheric carbon storage, new science is also emerging which similarly questions the efficacy of large scale thinning on forest health in regard to disease, pests and fire, and these assumptions in the draft EIR are also questionable and must be revised.

Please send all replies via electronic mail.

-end of comments-

Eric Brooks  
Sustainability Chair, San Francisco Green Party  
288 Onondaga Ave # 4  
San Francisco, CA 94112  
brookse@igc.org  
415-756-8844

**From:** laura@littlehorses.net  
**Sent:** Tuesday, March 19, 2013 4:59 PM  
**To:** Campus Planning - EIR  
**Subject:** Fw: Mt Sutro Forest Plans

Hello-

I'm writing today to voice my opposition to the plan to thin the forest on Mt Sutro. Unlike the dunes and crags they replaced (and the scrub and grass native plant lovers wish to replace them with) these trees contribute to the health of San Francisco and the planet. They help to bring down the temperature of the city and scrub the air clean. They offer refuge for wildlife and create a green cathedral in which we humble humans can escape the urban chaos and reconnect with nature.

As a university that has made its reputation on medicine and science, UCSF should be particularly attuned to the beneficial effects of this mature forest in the heart of the city. And the university should cast a gimlet eye at the pseudo-science embraced by the native plant gardeners. Even if the citizens of San Francisco actually wanted to return all the open spaces west of downtown to native grass and scrub, too much has changed (about the contours of the landscape, the shade and wind and run-off patterns, the populations of birds and insects--even our regional weather) to sustain that long-ago landscape naturally.

Just look at the swaths of land "restored" by the city's Natural Areas Program on nearby Corona Heights. As they do all around the city, NAP volunteers tore out the non-native vegetation and installed native plants. And then they all moved on to another park, and everything promptly died. They repeat the cycle every year or so, and the result is always the same. Ugly and fire-prone, those parched and dusty hillsides provide a cautionary tale.

Our city's tree canopy is so meager to begin with. Mature trees are few and far between, and whole forests are rare treasures that should be cherished, not decimated and drenched in toxic herbicides. If we can't rely on our tax-funded educational institutions to be good neighbors and stand up against what amounts to botanical eugenics, then the future of San Francisco will be a bleak one, indeed.

Please rethink, and reject, the forest-thinning plan.

Thank you,  
-Laura Cavaluzzo  
156 Henry Street  
San Francisco, CA 94114

**From:** M. Clarke <chewedrum@yahoo.com>  
**Sent:** Tuesday, March 19, 2013 4:02 PM  
**To:** Campus Planning - EIR  
**Subject:** Saving the forest at UCSF

Dear Diane Wong,

I wanted to say that I go by that forest quit often and am proud that we have a cloud forest in SF. It seems to me that, as in other parts of the world, saving something as precious as this is worthwhile. Taking out massive amounts of trees such as is being proposed doesn't make any sense. I think if you look at the Amazon and see what is happening there to the forest and the effect that is having on the atmosphere all around the world you could see how something like this affects us all. We, as human beings, need all the nature we can get. We need to think about our part in the Global structure and what kinds of environmentally positive actions can be taken to help us all preserve as much nature as we can. As far as I understand, cloud forests need tight canopies to function properly. Please reconsider the action of taking out this massive amount of trees. It won't be good for any of us.

M.L. Clarke

One of your neighbors

From: [Portland Coates](#)  
To: [Campus Planning - EIR](#)  
Subject: FW: Attn: UCSF Environmental Coordinator Diana Wong  
Date: Tuesday, March 19, 2013 1:48:35 PM

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-----Original Message-----

From: Portland Coates [<mailto:portlandcoates@sbcglobal.net>]  
Sent: Monday, March 18, 2013 1:44 PM  
To: 'EIR@planning.USF.edu'  
Subject: Attn: UCSF Environmental Coordinator Diana Wong

I truly believe that leaving Sutro Forest alone and as it is will protect it and us far better than the slash and burn/cut idea that is being proposed by UCSF.

It sounds like the ideas I hear often from developers who want to "get rid of all those pesky trees" so I can put strip malls, parking lots and apartment houses there". I wonder why the rationale's are so similar?

Well, the big picture should include safety and environmental protection for the area and San Francisco as a whole - not just convenience for those who really dont care and probably do not live here either.

My family came here in 1840 - long time ago ---- My grandfather graduated from UC Medical School in the year 1900. Just before the big earthquake and fire. My family has a real stake in keeping San Francisco cool, foggy, and safe from another fire like the one that devastated the City in 1906.

One way to do that is to create a cool, damp environment which is NOT conducive to heat, drying out and fires.

Actually we need to keep Sutro Forest just as it is. It is perfectly suited to keep the entire area where is grows safe from dryness and fire danger. Why would you want to change that?

Leaving it as it is will protect the entire area from Fire Danger and at the same time create a real reduction in global warming and a reduction in greenhouse gasses - what a great duo!!

I Feel lucky that my relatives and others like my family planted those trees and had the long-term insight to do so---they are protecting you now. Let's keep it that way. If you need a place for another huge medical building - go to Mission Bay and build it there. The Mission District and the Bay view need the work and the money from selling the land to you - we dont. Leave it all alone and move on. Thank you for your time and attention.

Portland H. Coates  
1537 12th Avenue  
San Francisco, Ca 94122  
[portlandcoates@sbcglobal.net](mailto:portlandcoates@sbcglobal.net)  
(415) 564 4609



From: [Kathleen Cohn](#)  
To: [Campus Planning - EIR](#)  
Subject: Sutro Forest  
Date: Tuesday, March 19, 2013 2:17:45 PM

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March 19, 2013

Dear Diane Wong,

I walk the trails of Sutro Forest often. I have lived on Willard Street for over thirty years. I have listened and read and attempted to get the details straight which is difficult when information being given is not accurate as in the mock-up of what the forest will look like once 30,000 trees are gone.

It is clear to anyone who has any knowledge of the forest that cutting 90% of the trees per acre will mean the forest will no longer be a forest. It will become a scrub area like we see on Twin Peaks and this will cause permanent damage to ecosystem, wildlife, and quality of neighborhood life due to increased noise and wind. Not to mention the loss of an especially beautiful forest.

I do not see any plans to replant the ensuing scrub area with other tall trees. Tall trees would ensure that Sutro would continue to be a forest. And I am not sure if the lovely Japanese plum trees in the current forest will also be cut down. These trees grace our neighborhood as well as other residential areas and parks in the city. But perhaps they are not native?

I see no problem with allowing non-native trees and plants to flourish in the forest. If they have settled into their environment, thrive and give us pleasure, why cut them down just because they are not native? In my opinion, this takes a certain radical stance, the native-only stance, to extremes. We are, after all, a nation of immigrants, both people and plants. Non-native plants and trees that are already here shouldn't be summarily cut down.

I oppose UCSF's current plan for Sutro Forest. Surely there is a more conservative approach to meet the needs of the forest. The current plan would decimate Sutro Forest forever. It would have to be renamed Sutro Hills.

The UCSF plan for the forest is an extreme one. I don't know how you all got to this plan but you need to take some big steps back, and cease and desist on this proposed destruction of a beloved forest.

Sincerely,  
Kathy Cohn

1524 Willard St.  
San Francisco, CA  
94117

**From:** Stephanie Costanza <scostanza@hotmail.com>  
**Sent:** Tuesday, March 19, 2013 12:10 PM  
**To:** Campus Planning - EIR  
**Cc:** stephanie costanza  
**Subject:** Opposition to UCSF's DEIR re: Mt Sutro

I am writing to express my strong opposition to UCSF's plans to thin Sutro Forest and remove its understory.

I wish to site flaws in UCSF's DEIR detailed in the following Save Mount Sutro Forest link, to support my opposition:

<http://sutroforest.com/2013/03/15/flaws-in-ucsfs-sutro-deir-public-comments-due-19-march-2013/>

I live on Fifth Avenue, above Kirkham Street, and Sutro Forest is literally my backyard. It is home to countless birds and other creatures whose habitats would be decimated by UCSF's plans for the forest. I hear owls hooting from the woods at night and in the early morning darkness. I can attest to the dense fog that envelops the forest during the summer, resulting in a degree of wetness that is tantamount to drizzle. I fear that UCSF's plans to destroy the cloud forest nature of Mt Sutro will expose us to fire danger which does not now exist. My neighbors share these concerns. Finally, the impact the trees' removal on air quality in the city is a great source of concern. Trees are the planet's lungs. UCSF'S plans to poison and smother them is, to my mind, and unconscionable act against living things which provide beauty, shelter and life-giving oxygen to us all.

Sincerely,

Stephanie Costanza  
1570 5th Avenue #102  
San Francisco, CA 94122

## CRAIG DAWSON

1128 Irving Street  
San Francisco, CA 94122  
415-665-1077

March 19, 2013

### UCSF Environmental Coordinator Diane Wong

UCSF Campus Planning  
Box 0286, San Francisco, CA 94143-0286

Dear Ms. Wong,

I wish to express my support for the UCSF Mount Sutro Management EIR and most of the management actions proposed. I find that both of the alternatives found in section 6 to be unreasonable. I also find that any form of rigid tree spacing as the REDUCED PROJECT ALTERNATIVE proposes and the demonstration areas call for is flawed and entirely counterproductive to the core mission of improving forest health.

I have been directly involved, since 1997, in the ongoing efforts to mitigate the danger that the UCSF Mount Sutro Open Space Reserve presents to people and property from the dead and dying eucalyptus and the accompanying fuel load found within the Reserve. It is essential that the proposed management actions found within the UCSF Mount Sutro Management EIR be carried out immediately **with the exception of the flawed tree spacing**. Since the work on the original management plan begun in 1998 the University has been graced with good luck in that a devastating forest fire has not occurred. However, history shows that the longer we go without fire the ever increasing fuel load in the forest will insure a catastrophe of immense proportions when a fire finally happens.

As the Executive Director of the Sutro Stewards nonprofit organization I wish to be clear that there is much knowledge and detail that our members have gained over the last seven years while working in every section of the 61-acre open space. It is with this knowledge, through the projects we have undertaken, that I form the basis for my comments. We have met both success and failure in our clearing, restoration and trail projects. There is no reason for the University to reinvent the manual and also learn by trial and failure. Simple steps like using herbicide to treat Acacia stumps will save hundreds of hours removing masses of root sprouts that tarping will generate. But the largest single element missing from this EIR is the gradual introduction of other tree species throughout the 61-acre forest. Without beginning this process now there will be no new generation of replacement trees for a healthy future forest. The called for tree spacing is a recipe for failure since it, too, will inhibit the growth of the next generation of trees needed for a healthy and safe forest.

I wish to call attention to the following specific items found within the Draft UCSF Mount Sutro Management EIR: **(My comments are highlighted in italics)**.

### 3.4.1 “OVERALL INTENT”

“The 2001 Management Plan is a framework for management of the forest and continues to serve as a guide. However, specific plans for management continue to evolve as priorities change, remnant native plant communities are discovered, and new community members become involved and provide feedback to UCSF. In addition, the health of the forest has declined since the Plan was prepared. To address these changes, the proposed

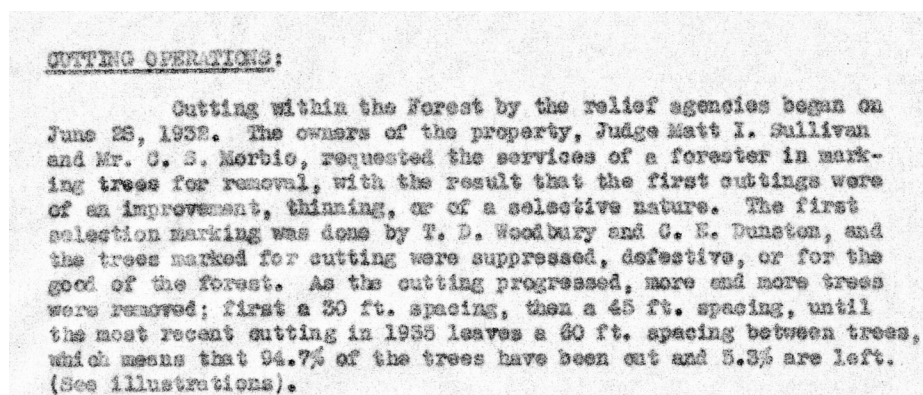
management activities may differ somewhat from those discussed in the 2001 Management Plan. These differences may include the number and sizes of demonstration areas, and in some cases some variation in the types of management actions proposed to occur within specific geographic areas. **The overall intent of proposed management activities, however, remains the same: to improve safety, to enhance the overall health of the Reserve, to improve its aesthetics, and to increase its usability."**

CD—If the true overall intent of managing Sutro Forest is to improve its health then we need to begin by removing language in this EIR that restricts the scope of such activities to failure. For example, some limiting language states that trees will be spaced at specific distances, i.e. 30 feet or 60 feet apart. Neither distance is far enough apart to allow sufficient light to support newly planted species intended for future forest diversity. This provides no opportunity for a new generation of "healthy" trees to grow. Rather the young saplings will grow too tall and thin in the quest for light, this is exactly the conditions which we can observe existing on the south and east ridges where logging/tree spacing has taken place in the past.

## FLAWED TREE SPACING CONCEPT – lessons from previous attempts

CD—For all the work that has gone into this EIR, it seems that a very important point has been missed. Why, in a forest that covers 61 acres, have the experts continued to perpetuate the idea of measured tree spacing as a solution? This concept is flawed and essentially dooms the concept of reintroducing new tree species for future forest diversity to failure. All references to tree spacing should be removed from this document because spacing of mature trees to distances of 30-60 feet will only cause the assumed healthy remaining specimens to grow into the afforded new space which in turn provides no light for new trees or diverse understory plants to grow in. This is the very reason we need to open areas up to a more natural, random placement. Only by leaving openings will we begin the forest regeneration process and ensure a diverse and healthy future forest. Even Adolph Sutro realized the need for diversity and included other species including pine and cypress in the original planting. However, the eucalyptus grew much faster and early photos show the other tree species in decline under the dense shade of the eucalyptus.

Many areas of the forest have been previously logged. This can be easily seen on the 1935 aerial Figure 4.4-2 which shows the results of logging on the south side where trees were spaced to 60' apart (the actual foresters report documents this below).



1935 Foresters report, cutting operations



8/15/35.

CUTTING UNITS:

Cutting was done from the various areas in the following sequence (See index map bound with this report). The outlines of the areas, other information, and dates were given to O. E. Evans by U. R. Gray and Harry Allumbaugh.

Area F: Cut under the direction of Frank Green by Associated Charities and San Francisco Emergency Relief Administration, beginning June 28, 1932. Camp #1 was along the road, a quarter of a mile west of the present Sutro dwelling. The cutting was done with funds raised by a city bond issue, and the cutting records are in the Department of Engineering of the City of San Francisco. In 1933 and 1934, Superintendent Johnson made additional cuttings up to a 30 ft. spacing, and later this was increased to a 60 ft. spacing. Total acres in unit, 19.95. Cords removed, 983.

Area E: Cutting began by Associated Charities in 1933. This area was first cut to a 30 ft. spacing and then to a 45 ft. spacing. The CWA continued the work in 1934, and the SERA from March, 1934 to July, 1935 cut to a 60 ft. spacing. Total acres of unit, 27.96. Total cords removed, 1,616.3.

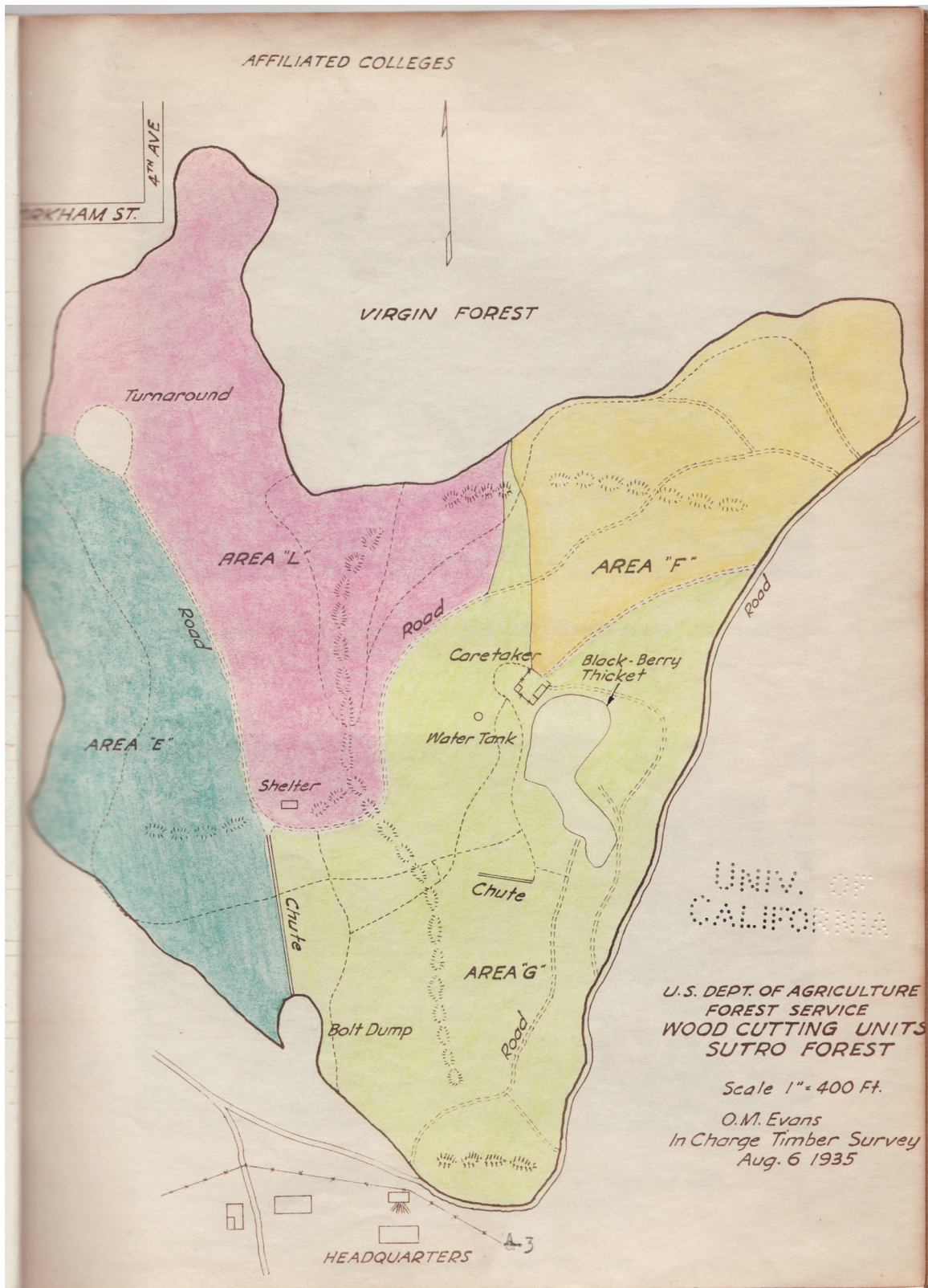
Area G: Cutting began by CWA in December, 1933, and continued until March, 1935. First a 30 ft. spacing was used, and afterwards a 45 ft. spacing. The SERA continued cutting from April, 1934, to January, 1935, and opened the forest to a 60 ft. spacing. Total acres of unit, 44.50. Total cords removed, 2,589.6.

Area L: First cut by SERA to a 45 ft. spacing and later to a 60 ft. spacing, when in April, 1935, there was a change of administration. Total acreage cut, 22.8. Cords removed, 1,405.53.

Blanchard Area: Cutting began on the Blanchard area in December, 1932, and followed for two or three years. A 100% check on this area shows that 481.73 cords were removed.

1935 Foresters report, units logged



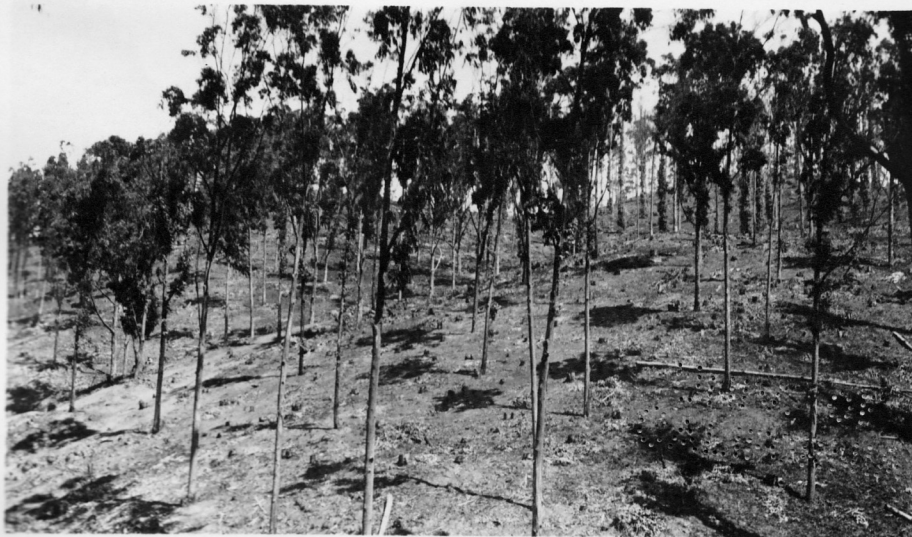


1935 Foresters report, areas logged





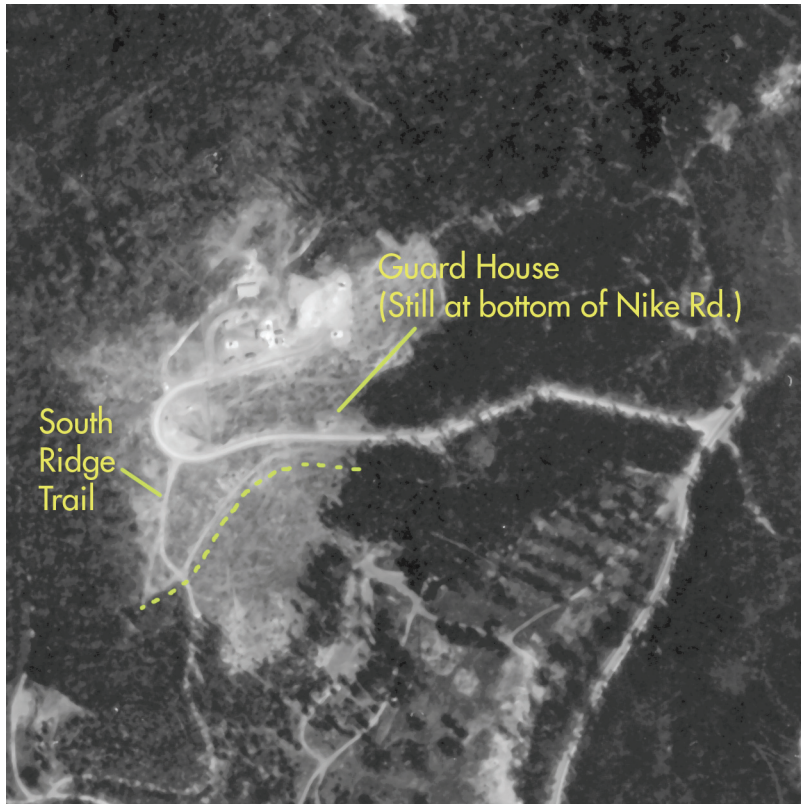
5. Cutover land. Laguna Honda and cut at end of log chute.



6. Upper slopes of cutover land. Trees left are approximately a 60 ft. spacing.

1935 Foresters report, 60-foot spacing. Notice how thin but tall the trees grew while crowded together. Also note the lack of upper spreading branches and broad canopy. This will all fill in over a very short period of time, again shading the ground.

On another aerial from 1955, it shows the south ridge was cleared completely during construction of the NIKE base. These logged areas contain many multi-trunk trees that re-sprouted from trunks left behind. These areas are the most severely overcrowded, but once all the dead, dying and weak multi-trunk trees are thinned out there will be gaps far larger than the proposed 30 feet. In fact if only the healthy trees are selected to remain we will have something resembling the natural spacing of trees found in areas on the north side of Mount Sutro, with random spacing of 50 to 100 feet with enough light reaching the ground to begin planting other species.



1955 South Ridge, NIKE base construction. The cleared area covers the south and east ridges, now the most overcrowded section of forest with the highest fuel load on Mount Sutro

### 3.5 PROJECT DESCRIPTION

The EIR states; **“The proposed project would involve implementation of a number of management activities, including thinning of the forest, native plant restoration and enhancement, and conversion planting (removal of non-native trees and plants and conversion to native species).”**

CD—Again, I wish to point out that the concept of conversion planting requires sufficient sunlight and moisture for the newly introduced species to survive. Leaving eucalyptus in place will shade and rob newly planted specimens of much needed water.

The EIR states; **“Of the Reserve’s 61 acres, conversion planting would occur in the East Bowl Corridor (about 2 acres) and potentially in Area “K” (about 1.5 acres). Accounting for the summit (about 1.5 acres), about 56 acres of forested area would remain where the predominant species is eucalyptus. Thus, the overwhelming majority of the Reserve would**



**remain a eucalyptus forest, although at a lower density of trees per acre than exists today.”**

CD—This proposal for conversion planting of from 2 to 3.5 acres and leaving the remaining 56 acres eucalyptus is a flawed concept and contrary to the statement found in 3.2 CONDITION OF THE RESERVE;

**“The Mount Sutro Open Space Reserve Management Plan indicates that, as with any monocultural (i.e. single species) forest, the trees of the Reserve are particularly prone to widespread disease and wildfire.<sup>2</sup> Their vulnerability will increase as more trees become stressed from greater competition with one another and as more die. The denser and more stressed the trees become, the more they are susceptible to infestation by pests.”**

CD—The statement above speaks to the dire need for much broader conversion and diversity for improved forest health. While the EIR indicates awareness of the snout beetle infestation that was first observed less than four years ago, it fails to acknowledge the current widespread severity of the damage clearly visible throughout the reserve. The statement below also fails to note that the forest has no resistance to the increasing forces hastening its decline.

**“According to HortScience, without healthy regeneration through proactive management, the forest will continue to decline, and may eventually be overtaken by the invasive understory of shrubs and ivies.<sup>4</sup> Since preparation of the HortScience report, arborists retained by UCSF have observed that conditions in the Reserve have deteriorated.”**

### 3.5.1 DEMONSTRATION PROJECTS

CD—I will leave only those items which I have comments on below.

#### 3.5.1.1 #1. SOUTH RIDGE AREA – 3 ACRES

##### Trees

- **Tree thinning of remaining trees to average spacing of about 30 feet between trunks**

CD—INSUFFICIENT SPACING FOR CONVERSION PLANTING

CD—FAILURE TO ACCOUNT FOR NEEDED REGENERATION OF THE FOREST.

CD—30 FEET IS WAY TOO TIGHT. Healthy mature eucalyptus have 50 foot crowns.

CD—I repeat that your proposal contradicts your own experts statements:

**“According to HortScience, without healthy regeneration through proactive management, the forest will continue to decline, and may eventually be overtaken by the invasive understory of shrubs and ivies.<sup>4</sup> Since preparation of the HortScience report, arborists retained by UCSF have observed that conditions in the Reserve have deteriorated.”**

- **Tree stump treatment: 1 acre – rely on hand maintenance; 1 acre –cover with tarps; 1 acre – apply herbicides**

CD—YOU MUST USE HERBICIDE ON ACACIA! Roots will resprout for years without it.

- **Sprout control: cut mechanically or use goat grazing 1-2 times per year for 3-5 years in 1 acre where stumps are not tarped or treated with herbicide**

CD—DO NOT USE THIS METHOD ON ACACIA. The more they are cut the more come

up.

#### 3.5.1.2 #2. EDGEWOOD AVENUE AREA – 2 ACRES

##### Trees

- **Tree thinning minimal, mostly acacias. Of those areas to be thinned, remaining trees to average spacing of about 30 feet between trunks, close to the spacing that currently exists**

**in most of this area**

- **Tree stump treatment: cover with tarps**
- **Sprout control: maintain tarps until stumps are dead**

CD— Since most of what you are cutting is Acacia you cannot use tarps to control resprouting. Good example of failure along Medical Center Way near EH&S. Acacias were cut and stumps tarped. Over the last year dozens of acacia sprouts have grown from the roots, not from under the tarps.

### **3.5.1.3 #3: NORTH SIDE OF SUMMIT – <0.5 ACRE**

#### **Trees**

- **Remove trees minimally, only as needed to prevent shading of existing Nootka reed grass area**

CD—STOP!! This will not work! The reed grass NEEDS the trees for fog drip. In naturally occurring reed grass patches, the grass is directly exposed to the full moisture from the fog and receives sufficient water. This colony is behind the screen of trees to the west which scrub the moisture from the fog. When the eucalyptus above the reed grass were killed and cut down the grass below them died too.

### **3.5.1.4 #4. EAST BOWL CORRIDOR – 2 ACRES**

#### **Trees**

CD— This is the upper Woodland Creek riparian corridor. The plan should include removal of ALL eucalyptus within 30 feet of the stream channel, or low point of swale. RPD performed similar creek restoration in Glenn Canyon and the water flows year round now. The eucalyptus were responsible for draining the creek. Plans for this area need to include restoration for wildlife with specific suitable habitat being introduced as well.

- **Tree thinning of remaining trees to average spacing of about 60 feet between trunks**

CD—Drop the 60 -foot spacing. The trees are already much farther apart than that in much of the bowl area. Many of the older trees have ivy all the way into their crowns. We have killed ivy on many similar trees and the surprising result is that by the time the dead ivy falls off the tree, the tree is so stressed it dies soon after.

- **Tree stump treatment and sprout control would depend on outcome of Demonstration Project 1, but for purposes of this analysis, it is assumed that herbicides, perceived by some community members as being the most impactful, would be used**

CD—This area has Acacia on the western slope but a single stump treatment will mitigate the damage done by continually needing to re-access sprouting roots and stumps.

- **Planting of native shrubs and trees (1 acre irrigated, 1 acre non-irrigated)**

CD—Selection of appropriate species could eliminate the need for irrigation in this location.

#### **Understory**

- **Initially, mow up to 90-100% (excluding native plants; including poison oak along trails); large areas of underbrush are expected to be maintained in this demonstration area**

CD—What does "UNDERBRUSH" refer to? Existing or newly planted?

- **Re-growth control depends on outcome of Demonstration Project 1 but for purposes of this analysis, it is assumed that herbicides, perceived by some community members as being the most impactful, would be used (herbicides would not be used if it can be demonstrated in Demonstration Project 1 that undesirable understory plants can be controlled at a reasonable cost without herbicides.)**

CD—This area has dense Himalayan blackberry. It cannot be controlled without herbicide. The roots and runners left behind after clearing can remain dormant for longer than a few years before resprouting.

### **3.5.1.5 “HANDS- OFF” MANAGEMENT AREA: SOUTH RIDGE AREA – 2 ACRES**

#### **Trees**

· **No changes to existing trees, except that maintenance will be performed to remove and prune hazardous trees near homes and trails for the safety of residents and visitors and to keep trails clear (including trash pick-up).**

CD—HANDS OFF IS DANGEROUS NEGLECT! This area has one of the highest fuel loads on Mount Sutro and is in closest proximity to residences on Christopher Drive. Dead wood, diseased trees, leaves, bark, ivy and blackberry make this a high-risk area. All issues associated with this problem are included in the EIR. These conditions exist just 30 feet from occupied homes!

#### **4.7-4 The primary vegetation issues at the Reserve are:**

- **Young trees compete for sunlight and nutrients and are dying throughout the forest**
- **English ivy on tree trunks overloads and shades out trees, especially mature ones.**
- **Heavy accumulation of forest debris is fuel for wildfires.**
- **Hazardous leaning trees and heavy lateral branches could fall.**

CD—The Christopher trail realignment has been on hold since before the FEMA Grant. It runs through this area. Please publish a firm date for this project to begin.

## **4.7 HAZARDS -- FIRE HAZARDS**

### **Fire History**

#### **MISSING DOCUMENTATION OF FIRE HISTORY**

CD—While there is a claim to a history of fire in this EIR, it sadly lacks a history of all incidents which have been published. We have heard from witnesses at community meetings that there is also an oral history of more recent incidents as well. Which was also omitted in this EIR.

**Oct 8, 1899 - The ‘Great Fire’ burns 60 acres in Sutro Forest nearly threatening the Affiliated Colleges, and the Alm’s House. It took 70 firemen and several hundred volunteers to get under control. It is said that the ‘woods are overrun with picnickers, hunters and tramps’ — Source - sf chron 10/9/1899**

**10/22/ 1917 – ‘Midnight Blaze Seen for Miles about SF’ read the headlines. A seven hour ‘sweep of flame’ burned 10 acres of Sutro Forest. From Clarendon Ave it took 3200 feet of hose to control the fire rising above the Northerly ridge of Coyote Canyon. It drew a great many spectators. Most notable was the wildlife that was reported to have gathered in the aftermath on Edgewood Ave. Coyotes, wild cats, racoons, wolves, and skunks - ‘ They seemed to be living in common fear.’. — Source – SF Examiner 10/ 22/ 1917**

**6/3/ 1918 – ‘Fire Sweeps Over 100 Acres in Sutro Forest’ - on eastern side of Mt Davidson — Source – SF Examiner 6/3/ 1918**

7/19/ 1929 – Fire Burns 15 Acres of Sutro Forest. It broke out near 7<sup>th</sup> Ave and Lawton burning a strip of land 1500 ft x 500 ft.. Ordinary city methods were of no use, so the employed ‘up-country’ methods and fought it with shovel, axe and greenfalls. Source – SF Chronicle 7 / 19 1929

10 / 7 1930 — A wave of Forest Fires swept California to to a typical October Hot spell. School boys are credited with helping the fireman and 17 vehicles get their hoses to the blaze. The nearest hydrant was on the steep side of Stanyan St, and the fire was on the summit of Mount Sutro. Source – SF Chronicle 10 / 7 1930

2/ 23 1939 — ‘Fire Sweeps Sutro Forest’ 5 Acres of wooded land in the gulch of Sutro Forest ( near Twin Peaks and Clarendon) source – SF Chronicle 2/ 23 1939

Nov 1948 - Forest Fire on Mount Sutro burns 10 acres. It is spotted by 10 year old Arnold Gridley whose family occupied an old farm house at the rim of the forest off clarendon Ave. Source- Chronicle 11/10/1948

## 4.8 HAZARDS -- HERBICIDE USE

### Target Plants

Plants to be treated include eucalyptus, acacia, broom, Himalayan blackberry, English and German ivy, panic veldtgrass (*Ehrharta erecta* - an invasive non-native grass), and poison oak (near trails).

CD—This is only a partial list of invasive plants now growing alongside trails. Since the University stopped using herbicides there has been an explosive growth of invasive weeds along most trail corridors. The removal of invasive plants by hand actually causes a rapid increase of the invasive plants as a result of disturbed soil and impossible-to-control seed release. Very selective use by applicators is essential to protect the native plants found in the affected areas.

### 6.1.1 NO PROJECT ALTERNATIVE

The following EIR statement illustrates why this option is flawed and is completely unacceptable: **“ongoing maintenance in the Reserve, an activity exempt from environmental review under CEQA, would continue as it did prior to the project being proposed.”**

CD—That statement reflects that the University will in fact continue to do absolutely nothing to mitigate the fuel load under this alternative. Further, it offers no attempt to improve the health of a currently declining 61 acres of urban forest. These statements can be supported by the facts which show that funding has never been approved for any fire mitigation activities within the forest and for only a slight effort to remove hazardous trees along roadways and homes. By continuing to “do nothing” the University risks increasingly severe liability from a wildfire occurring within the forest and spreading to surrounding neighborhoods as well as the sudden collapse of dead and dying trees or limbs falling on open-space users.

### 6.1.2 REDUCED PROJECT ALTERNATIVE

CD—Why are we more concerned about noise than creating a safer and healthier forest for future generations to enjoy? For all the work that has gone into this EIR a very important point has been missed. A healthy forest needs a diversity of tree species. In order

to successfully reintroduce other species the young trees need sufficient light and moisture. Why, in a forest that covers 61 acres, have the experts continued to perpetuate the idea of 30 to 60 foot measured tree spacing? This concept is flawed and all references to tree spacing should be removed from this document and in its place I recommend **random clustering of tree stands separated by open understory plants.**

Many areas of the forest have been previously logged. This can be easily seen on the 1935 aerial Figure 4.4-2 which shows the results of logging on the south side where trees were spaced to 60" apart and on another aerial from 1955 that shows the south ridge was cleared completely. These logged areas contain many multi-trunk trees that re-sprouted from trunks left behind. These areas are the most severely overcrowded, but once all the dead, dying and weak multi-trunk trees are thinned out, there will be gaps far larger than the proposed 30 feet. In fact, if only the healthy trees are selected to remain we will have something resembling the natural spacing of trees found in areas on the north side of Mount Sutro, with random spacing of 50 to 100 feet. What will it look like? Just like the forest along the Historic Trail as you walk in from Stanyan Street.

### **OPPORTUNISTIC CONVERSION PLANTING**

CD—Without the creation of more "holes" for sunlight to penetrate to the ground there is slim chance of any successful conversion planting. Since the introduction of other tree species provides a number of long-term benefits I suggest that we include "**opportunistic conversion planting**" as part of this EIR. In particular in areas where we lose groupings of mature trees (through natural decline or removal of hazardous trees) and gain light as a result, we have the opportunity to plant replacements immediately. Light brushing on an annual basis can keep invasive understory plants at bay until the trees reach sufficient height. A slow incremental process such as this proposal could produce significant long-term benefits for forest health and wildlife habitat.

A handwritten signature in black ink that reads "Craig Dawson" followed by a horizontal line.

Craig Dawson  
Executive Director  
Sutro Stewards

**From:** Richard Drechsler <r\_drechsler@yahoo.com>  
**Sent:** Tuesday, March 19, 2013 4:15 PM  
**To:** Campus Planning - EIR  
**Subject:** Public Comment on Sutro Forest EIR

Dear Ms. Wong,

I am writing to you in order to object to UCSF's EIR, and its plan to re-landscape what is now called the Sutro Forest. I urge the university to choose the "No-Project Alternative" and to focus its attention on maintaining the Sutro Forest as a San Francisco landmark that everyone should respect and enjoy.

I am bird watcher, nature guide, gardener, Audubon member who believes that this unique area of San Francisco, its fauna and flora, should be supported and defended. I want to speak up in support of the animals who have called this forest home for a hundred generations and who breed, feed and seek shelter there.

I am aware of the intense eco-politics that all open spaces in San Francisco have been subjected to for many years. Organisms not judged to be "native" in S.F. must now defend their existence; their behavior; and how much they may consume and pollute. Any living thing bears a heavy burden under such scrutiny, especially when its contributions to the environment and society are ignored.

In the case of Sutro Forest the "non-native" Eucalyptus tree has been condemned because of the fear that it poses a fire hazard for the neighborhood. This despite contrary opinions from FEMA and local arborists and the fact that there has not been a fire in these foggy and damp woods for 80 years. Still UCSF and native plant enthusiasts have successfully marketed this catastrophic theory that has cultivated a neighborhood of distressed residents.

Were Sutro Forest composed of Redwood or Oak trees your plan to alter the habitat by removing 60% of the tall trees would not have been proposed or advanced to this stage; even though these natives can also be accused of posing their own threats and dangers.

Your plan for a seven acre test site has not been successful when implemented at other restoration sites in SF. It will yield acres of random grasses and "weeds" that will be unsightly and offensive to the neighborhood and create its own fire hazard. Look at what little progress has been made at the Rotary Meadow on the summit in an area less than 1/4 of an acre. Visit other restoration sites and ask for how many years it required regular weeding, water, maintenance and replanting.

UCSF should alter its mindset and embrace these woods, this product of man and nature that grows, regenerates and maintains itself so effortlessly. Create a "Muir Woods" in your backyard and let San Franciscans be proud and not fear it.

Sincerely,

Richard Drechsler  
740 Rhode Island St.  
San Francisco CA 94107

**From:** vicky ehrlich <vicky.ehrlich@gmail.com>  
**Sent:** Tuesday, March 19, 2013 5:21 PM  
**To:** Campus Planning - EIR  
**Subject:** DEIR report on sutro forest is wrong

dear diane wong

i would like to point out just two of the many flaws in the DEIR report upon which your decision to cut down 30,000f trees in sutro forest is based.

1. p. 4.7-4 describes the canopy as "sparse", but this is the natural eucalyptus canopy, which allows for a subcanopy of smaller trees and a lush under story. the more variety of species, the better, for human visitors and wildlife.

2. thinning the trees will actually create more fire hazard, as it will promote drier, windier conditions. please think carefully before you cut these trees down: a legacy of destruction and butchery would not be to your credit.

vicky ehrlich, a voter

**From:** kevin intramuros <ingadaddy727@gmail.com>  
**Sent:** Tuesday, March 19, 2013 2:51 PM  
**To:** Campus Planning - EIR  
**Subject:** UCSF MT> SUTRO

Diane-

As a 25-year resident of the City, and a current resident of 9th ave, I must express my shock and outrage at the University's plans to remove and eradicate the forest atop Mt. Sutro. I gaze out my front window onto the west slope every day and always enjoy the pastoral view of the eucalyptus trees swaying in the wind. I also frequently hike the Fairy Gates Trail and have traversed all the paths i have discovered nearby. Please do not destroy this vibrant and beautiful outdoor setting! Honestly I just can't imagine looking out that window one day and seeing a bald muddy hill across the way. How could UCSF come to such an absurd and blatantly unpopular decision. Please register my complaint. I am fervently opposed to the plan. And I'm telling everyone I know.

Please reverse this insidious decision to destroy my front yard!

With all due respect,

Kevin Freeman  
1367 9th ave apt 1  
SF 94122

you can also respond to me at work: [kfreeman@rainbow.coop](mailto:kfreeman@rainbow.coop)



**From:** [Sonia Gariaeff](#)  
**To:** [Campus Planning - EIR](#)  
**Subject:** Sutro forest  
**Date:** Tuesday, March 19, 2013 4:32:20 PM

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Dear Sir or Madam,

As an alumni of the University of California and a long time resident of San Francisco, I urge to to abandon the plan to destroy Sutro Forest.

If plans for construction are to proceed, you should be aware that they will be met with resistance every step of the way. Our community very much wishes to maintain the natural beauty that makes San Francisco exceptional, and we will not accept this destruction lightly.

As a graduate of UCSC, I appreciate the importance of furthering and improving educational opportunities. However, I also know that there must be other options.

I hope that you will use your intelligence and integrity to look into alternatives.

It is in all of our best interests to keep San Francisco beautiful, and to avoid negative press for the University of California.

Thank you for your time and consideration.

Sincerely,

Sonia Gariaeff

Sent from my iPhone

**From:** Gillian Greensite <gumtree@pacbell.net>  
**Sent:** Tuesday, March 19, 2013 11:24 AM  
**To:** Campus Planning - EIR  
**Subject:** Comment on UCSF's DEIR for Mount Sutro

Environmental Coordinator Diane Wong.

Dear Ms. Wong:

I have read the DEIR for the proposed project at Mount Sutro and would like to have the following comments included for consideration:

I live in Santa Cruz, CA and am a 30 year employee of the UC system. UC's professed role as a steward of the natural environment under its control is contradicted by this project. There appear to be no evidence-based reasons for the removal of so many trees in Mount Sutro. The DEIR contains errors of fact and misleading statements. Some examples are:

1. The before and after pictures are examples from elsewhere with no trees removed. Only underbrush. This needs correcting for the EIR.
2. The statement that the canopy is "sparse and unhealthy" is inaccurate and shows ignorance of the characteristics of this type of blue gum forest. I grew up in Australia and can confirm that this is what a healthy young blue gum forest looks like. Please correct this for the EIR.
3. The fire hazard described in the DEIR is exaggerated and not supported by fact. Experts have already written to you supporting this statement. Please amend the EIR to more accurately summarize the role of blue gums in the Oakland fire and fire potential in general. It is well-documented that thinning a forest can increase the fire potential. Please have the EIR reflect this knowledge.
4. The EIR should more accurately convey the impact of such thinning on the variety of wild-life that depend on the forest in its current state. It is a well-known fact, cited by expert birders such as Dr. Todd Newberry ( page 51 "The Ardent Birder" 2005) that native birds love non-native trees such as found at the UCSC Arboretum. This would also apply to Mount Sutro.

In sum, I look forward to seeing an EIR that removes the speculation, opinion and mis-statement of fact contained in the DEIR.

Thank you in advance for responding to my comments on the DEIR.

Gillian Greensite  
130 Liberty St.  
Santa Cruz, CA 95060

**From:** Alma Hecht <alma@secondnature.bz>  
**Sent:** Tuesday, March 19, 2013 11:18 AM  
**To:** Campus Planning - EIR  
**Cc:** SFForest Alliance  
**Subject:** Fwd: oppose cutting of trees at UCSF Sutro Forest

Dear Committee,

It is unconscionable that you are considering destroying this magnificent cloud forest in the middle of our City forever altering our ecosystem and all the inhabitants from birds to invertebrates. I completely oppose the cutting of 30,000 trees and am appalled you are even considering it.

Alma Hecht

---

Alma Hecht, APLD – ISA Certified Arborist  
land: 415-586-6578  
mobile: 415-830-0556  
<http://secondnature.bz/>

<http://www.flickr.com/photos/almasecondnature/>

**From:** LH PR <lhelman@sbcglobal.net>  
**Sent:** Tuesday, March 19, 2013 2:45 PM  
**To:** Campus Planning - EIR  
**Subject:** The Sutro Forest DEIR to save as many as 30,000 trees

UCSF  
Diane Wong

Diane,

How wrong that UCSF will even consider removing trees from Sutro Forrest.  
For what reason.  
SF has way too few trees already.  
Please focus your attention elsewhere and leave our precious trees be.

Thank you.

LAwrence

Begin forwarded message:

**From:** "SF Forest" <[noreply@list.signon.org](mailto:noreply@list.signon.org)>  
**Date:** March 18, 2013 7:33:04 AM PDT  
**To:** [lhelman@sbcglobal.net](mailto:lhelman@sbcglobal.net)  
**Subject:** Last Chance to Write A Comment To The Sutro Forest DEIR to save as many as 30,000 trees  
**Reply-To:** "SF Forest" <[sfforestnews@gmail.com](mailto:sfforestnews@gmail.com)>

Dear Forest Supporters --

You have only two days -- until Tuesday, March 19 at 5:00 pm -- to submit a comment to oppose the UCSF plan for felling up to 30,000 trees in Sutro Forest. For a list of pointers you could use in your comment please visit: <http://sutroforest.com/2013/03/15/flaws-in-ucsfs-sutro-deir-public-comments-due-19-march-2013/>. Every comment counts, so please make an effort to be heard. It may be *your* letter that saves the forest! The person to write to at UCSF is Diane Wong, and her email address is: [EIR@planning.ucsf.edu](mailto:EIR@planning.ucsf.edu)

Also, please visit our San Francisco Forest Alliance Facebook page and "like" us! The more "likes", the more clout we'll have: <https://www.facebook.com/ForestAlliance>

Thanks for your help!

SFForest Alliance  
[SFForest.Net](http://SFForest.Net)  
[sfforestnews@gmail.com](mailto:sfforestnews@gmail.com)

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Sent via my desktop computer from my basement office in SF

## PUBLIC COMMENT ON UCSF'S DRAFT ENVIRONMENTAL IMPACT REPORT ON MOUNT SUTRO MANAGEMENT from HILLS CONSERVATION NETWORK

The Hills Conservation Network supports those who advocate removing from Mount Sutro Forest only dead trees (and trees diagnosed as diseased by at least one arborist chosen by the SF Forest Alliance), and removing understory that is dead and dry (not understory that is living, green and moist).

I do not live in San Francisco, but I have occasionally enjoyed hiking the trails of Sutro Forest. Last time I was there I encountered a professional photographer who was taking photos for a magazine in New Zealand. She told me that she had not expected to see such a unique forest in the middle of a city. She said she would value the photos she had taken of Sutro Forest more than any photos she had taken of S.F. City streets and the Bay, including the view from Marin Headlands. She described the experience of being in Sutro Forest as "spiritual" and inspirational, a "rare find," not at all what she had expected to see in San Francisco.

As a representative of Hills Conservation Network, I want to primarily address the issue of fire hazard.

All of the members of HCN's board of directors live in the North Hills of Oakland, within the area that was almost completely burned in the Oakland-Berkeley fire of 1991. My house, built in 1939, is in a strip of about 15 houses on Alvarado Road that did not burn, although all of the houses and vegetation (plants and trees, native and nonnative) above and below that strip, as well as everything across the street burned to the ground.

My family was fortunate. We do not know why these 15 houses and a few others here and there in the hills were spared. But we do know that the fire stopped just as it reached three towering eucalyptus trees that stand at the edge of Garber Park, a 13-acre city of Oakland park that also did not burn in the fire (even though it was and still is filled with largely unmaintained trees and understory). The flames of the fire did not touch those three eucalyptus trees which had stood there for more than 100 years, even though at that time, there was plenty of bark litter on the ground under them.

After the fire, as you can imagine, fire survivors cast a great deal of blame on various public agencies, including first responders such as the Oakland Fire Department, for its lack of training in fighting wildfire. (In fact, an Oakland fire fighter had restarted the fire on Sunday morning when he walked, stamping his boots, over the cinders and ash left from a small fire that had seemed to have been extinguished the previous day. As he walked, sparks and embers lying under the cinders flew up; the hot wind carried those sparks into dry grass and brush, and then into pines--that is how the Sunday fire started and soon spread out of control as the flames ignited wooden roofs and houses close by.) I won't list all of the issues that led to the rapid and tragic spread of the 1991 fire. The important ones were that after the first 20 minutes, there was no power to pump the water uphill--so there was no water in the hydrants; there was a total lack

of radio communication between the OFD and fire districts from neighboring towns that had tried to come to Oakland's aid; the streets in the hills were not only narrow and winding; cars had been allowed to park on both sides of the street, so fire trucks could not get up to the fire, and residents could not get out; some of them died trapped in their cars.

I will not deny that eucalyptus trees did *help* to spread the fire, along with native oaks, bays, manzanitas, and yes, even redwoods. But some eucs were still standing--with their leaves intact--in various places where everything else burned. After the first half hour of the fire, the flames were leaping from house to house, not from trees to houses, although the trees close to and leaning over houses burned, especially where dead leaves had fallen into gutters, and the house was unlucky enough to have wooden shingles. † Even though it was a hot day, the trees did not "explode." The popping and banging sounds came from cars exploding as gas tanks ignited.

Yet within two years after the fire, the eucalyptus trees were being blamed for the fire--and to prevent another terrible fire, the advice was to remove all of the eucalyptus in UC owned forests, in East Bay Regional Parks, and in Oakland's public parks that had not even been involved in the fire--and were several miles from any structure. It was certainly easy and safe to scapegoat the eucalyptus trees since native plant advocates in this area had been trying to get them removed for years, a campaign that is still going on. We trust that UCSF will be able to see through the fog of this propaganda campaign against nonnative vegetation, and make a decision that will be best for both fire safety and Suto Forest.

Our organization, Hills Conservation Network, came together because a group of fire-area residents realized that it was important for fire safety to research and publicize the real reasons why the 1991 fire spread out of control so quickly. The majority of those on our board of directors lost their houses in the fire, and one of them lost his disabled mother, who burned to death because of tragic errors made by emergency responders. So, we did not start our organization because we are "tree-huggers." We are committed to learning as much as we can about preventing wildfire and educating our neighbors about the importance of big hardwood trees (such as eucalyptus) in providing not only carbon storage that cuts the greenhouse emissions warming our planet, but also in mitigating fire risk.

Based on our experience of the 1991 Oakland-Berkeley fire we of the Hills Conservation Network believe that Mt. Suto forest should be preserved. Even more than the trees in Garber Park, that, I repeat, did not burn, even though they were close to the fire, the tall trees of Mt. Suto are draped in cooling mist for most of the year. The understory at Mt. Suto is moist, providing an almost fire-proof ecology. If this understory is removed, and the trees are removed, what you will have left are weeds, growing profusely in the sun once the shade canopy of trees is no longer there.

In the hot, dry months of late September through October, whatever weeds have grown up, will dry out and become highly flammable. Even if native plants and shrubs have been planted in

those areas, and even if those natives are irrigated, they will dry out because that is the nature of most native plants and shrubs. They bloom with the rains of winter and spring, then set seed, dry out, and may even look dead until the following blooming season. if you drive throughout the East Bay along places where native plant advocates have attempted to establish gardens, you cannot help but see that most of these plants have dried out by the beginning of summer, and they are ready to be ignited by the live ash of a cigarette carelessly thrown from a car window or the sparks from a defective catalytic converter.

I will avoid the controversy of native vs. non-native, although I feel strongly that fire safety should not and must not be held hostage to ideology. Fire scientists tell us that species of chaparral shrubs and brush as well as grasslands have much higher flame lengths than any species of tree. (According to the Hills Emergency Forum, an organization of public agencies in the East Bay that collects and shares information, grasslands can have flame lengths ranging from 12-38 feet; brush and scrub (including chaparral) have flame lengths ranging from 14-69 feet; eucalyptus trees, including the litter under them, have flame lengths ranging from 6-21 feet.<http://www.hillsemergencyforum.org/MgmtRecmdtn.html>) The thick trunks of trees resist fire longer than the small-leaved, oily shrubs that may appear to be green on top, but have a great deal of dead wood under their top branches (and this is true of native, unmaintained manzanitas, ceanothus and coyote brush as much as it is of non-native broom and pampas grass). The "finer" the fuel, as with native or non-native grasses, the more quickly it ignites, and the hotter, and higher it burns.

Based on a study of two fire-prone regions (Santa Monica mountains and San Diego County), the fire scientist Jon Keeley and others wrote recently that predominant wind patterns and direction make certain places more fire-prone than others. (Note that the tall trees on Mt. Sutro create a windbreak. Without them, you will have the hot winds of late fall sweeping down on UCSF campus, and we can only imagine how rapidly fire would spread through dry grass and shrubs and throughout the rest of the city.) Keeley wrote that **"property loss was also more (Santa Monica Mountains) or as likely (San Diego County) to occur within herbaceous fuel types [grass] than within the higher fuel-volume woody types [trees] that are typically considered as the most hazardous fuels."**

**“. . .herbaceous fuels tend to have low fuel moisture, facilitate high wind speeds and fire spread, and have low heat requirements for ignition, thus promoting longer fire seasons and high fire frequency. Grasslands also tend to ignite quickly, then carry fires into shrublands or woodlands. These results suggest a need to reexamine the assumptions used in existing hazard maps and the management practice of converting shrublands to grasslands.” See:**

**<http://www.plosone.org/article/info%3Adoi%2F10.1371%2Fjournal.pone.0033954>**

To answer specific points concerning fire hazard that were mentioned in the DEIR:

#### BARK

4.7-2 "The annual shedding of bark is one of the main reasons the [eucalyptus] trees present a



significant fire hazard. . . Their curly strips of lightweight bark and leaves can carry sparks considerable distances (i. e. miles), and they create excessive debris (i.e. fuel load) on the forest floor."

4.7-4 "Heavy accumulation of forest debris is fuel for wildfires."

During the 1991 Oakland-Berkeley fire, all sorts of material were picked up and projected forward--brush, branches, shingles, plastic buckets, even sheets of plywood. Although flaming bark flying through the air may have happened, I cannot find anyone who actually saw a burning strip of euc bark flying around in the fire. I have studied many photographs taken during the fire, and none of them showed anything that could be identified as flaming eucalyptus bark flying through the air. This scary image may have been promulgated largely by native plant advocates. PG&E also has resisted taking any responsibility for the hundreds of downed wires, with sparks igniting material that flew over Highway 24 into Montclair. According to the FEMA report, fireballs from transmission towers south of Lake Temescal ignited wooden-shingled roofs of houses in Oakland's Rockridge neighborhood, and started grass fires in Contra Costa County.

The bark of eucalyptus trees is not "curly," and the debris on the forest floor under eucalyptus trees is no more dense than the debris under coast live oak, redwoods (and many other tree species).<sup>†</sup> Redwoods accumulate large amounts of debris, "forming a dense mat on the forest floor limiting understory plants and other tree growth especially in a mature forest."

<http://www.flowersociety.org/Redwood-profile.html>

4.7-5 "Embers that are carried by wind could spark fires in nearby neighborhoods. . ."

"Although firebrands capable of ignition can originate from a fire several kilometers away, homes can only be threatened if the firebrands ignite the home directly [especially if it is untreated wood construction] or ignite adjacent flammable materials that then ignite the home."

See article by fire scientist Jack Cohen:

[http://www.firewise.org/resources/files/WUI\\_HIR/Wildlandfirethreat.pdf](http://www.firewise.org/resources/files/WUI_HIR/Wildlandfirethreat.pdf)

Many species of trees and plants (including native grasslands) torch, crown, and throw embers. See Southern California Firestorm 2003 Report for the Wildland Fire Lessons Learned Center.

In October 2011, Peter Gray Scott, a survivor of the 1991 Oakland-Berkeley fire, performed an experiment to compare the distance that samples of redwood needles (both green and dry), eucalyptus, oak, tan oak, and bay leaves would fly in "wind" from a 24" radial fan. He found that the higher the proportion of surface to density, the more likely it was that the leaf would fly to relatively measurable distances. Oak leaves flew the farthest. Eucalyptus leaves, because of their boomerang shape performed as badly as redwood needles; that is, they ignited slowly, and were not capable of sustaining a spark for more than 2 seconds.

## OILS

4.7-2 "eucalyptus are considered more hazardous because their oils are conducive to fire

ignition. . ."

According to the USDA, blue gum leaves are classed as "intermediate in their resistance to combustion, and juvenile leaves are highly resistant to flaming."

<http://www.fs.fed.us/database/feis/plants/tree/eucglo/all.html>

According to Cornell University studies, essential/volatile oils in blue gum leaves range from less than 1.5 to 3.5%. <http://www.ansci.cornell.edu/plants/medicinal/eucalyp.html>

In contrast, the leaves of California bay laurel trees contain 7.5% of essential/volatile oils (more than twice the amount of oil in leaves of blue gums).

<http://www.paleotechnics.com/Articles/Bayarticle.html>

Certified arborist Mark Bowman comments: "I don't understand why eucalyptus is getting this bad rap as a fire starter. . . I saw the smoke that day when I was driving along Grizzly Peak Boulevard, and the first thing that came to mind was that 'it finally happened.' Anyone who worked in that area in the arboriculture and landscaping fields knew it was inevitable, and never once did I think that the eucalyptus trees were the issue; 20 years later, I still don't. . . The fire couldn't care less what species of tree is in its path or whether it was here before 1750 or not. . . Let's use a little common sense. . . This 'native plant is superior' mentality is going to end up being a big taxpayer and/or rate payer fraud with no significant benefits and (more to the point) many unintended consequences if this movement is allowed to come to fruition." from an article based on an interview with Mr. Bowman that appeared in *Pt. Reyes Light*, December 2010.

#### NON-NATIVE PLANTS VS. NATIVE PLANTS

4,7-9 "Certain types of plants are more susceptible to burning or will burn with greater intensity; and nonnative plants may be more susceptible to burning than native species."

Everything in the path of the 1991 Oakland-Berkeley fire burned-- native: coast live oaks, redwoods, bays, shrubs (especially coyote brush, manzanitas, junipers) and native grasses; nonnative: pines, eucalyptus, acacias, nonnative grass, and all ornamental vegetation (even fruit trees and flowers). It is the characteristics of some plants and trees that make them easier to ignite and quicker to burn than others, but whether they are native or nonnative has nothing to do with whether they are more or less resistant to fire.

Characteristics of plants that ignite easily:

fine fuels, vegetation with small, narrow, lightweight or feathery surfaces, such as needles and tall grass, native or non-native; any grass that is allowed to grow tall and dry out; vegetation with small leaves such as broom, scrub, sagebrush, junipers, chaparral (chamise, coyote bush, scrub oak); vegetation that retains dry, dead woody material within the plant such as native chaparral; ornamentals such as rosemary, lantana, nonnative pampas grass; vegetation that is dry at the height of the fire season such as native chaparral and

grasslands, native and nonnative;  
 vegetation that sheds leaves, cones and needles, especially when the top layer of litter on the ground is allowed to dry out;  
 vegetation that contains oils and resins.

For characteristics of plants and trees that make them more or less resistant to fire, see: *Fire in the Wildland-Urban Interface* by J.Douglas Doran and others, U. of Florida and USDA Forest Service.

Native American people living in this area in prehistoric times periodically burned the land. They did this for a variety of reasons, burning easily only native vegetation since we must assume that's all that was here at that time. See: *The Ohlone Way* by Malcolm Margolin.

#### HEALTHY FOREST VS. A DISEASED ONE

4.7-2 ". . .wildfire spreads more rapidly in a diseased forest than a healthy one."

Sutro Forest may contain some trees that are diseased, but according to at least one certified arborist (not hired by UCSF), Sutro Forest is a healthy forest. Also see comments above stating that wildfire moves much more rapidly through chaparral and grass than through trees.

Also,

4.7-2 ". . .denser forests (such as the Reserve) burn more quickly and intensely than one where trees are more spread out."

Dr. Timothy Ingalsbee, of the Western Fire Ecology Center, writes that reducing tree canopy increases surface temperatures and decreases relative humidity. This causes hotter, drier surface fuels with higher rates of fire spread, greater flame lengths, and more erratic shifts in direction. In the same article, he states that fine-sized surface fuels are the primary carriers of fire. Large-diameter fuels such as trees with thick trunks resist fire; removing tree canopy stimulates the growth of chaparral brush that is much more flammable than trees. See: [www.wildrockiesalliance.org/issues/wildfire/fact\\_fantasy.html](http://www.wildrockiesalliance.org/issues/wildfire/fact_fantasy.html)

**From a letter to the Oakland Tribune, July 30, 2009, Writing about the Mayors 1992 Task Force Final Report, David Maloney, a retired Oakland firefighter who had been a member of the Oakland-Berkeley Task Force that created the report: "The Task Force Report concluded that the spread of the fire was mostly due to the radiant heat generated by burning houses. A burning house has a sustained radiant heat transmission of 2500-3000 degrees. The spread of the fire was not due primarily to burning trees--eucalyptus or any other species."**

**From the report itself: "Rescind Berkeley's eucalyptus eradication policy. This policy is contrary to sound fire prevention practices and environmentally detrimental. It also misleads the public about effective management for fire protection."**

We of the Hills Conservation Network support the maintenance and preservation of Mount Sutro's beautiful forest. We included an article about the forest in our most recent newsletter, and some of our members spoke at UCSF's public hearing.

UCSF's trained doctors know that the saying, "First, do no harm," is based on an interpretation of the Hippocratic oath, which begins with the words: "I will follow that regimen which according to my ability and judgment, I consider for the benefit of my patients, and abstain from whatever is deleterious and mischievous." We sincerely hope that UCSF will use its considerable research abilities and judgment to arrive at a decision that will abstain from "whatever is deleterious. . ." Please do not destroy a beautiful forest, and, in doing so, even with the best of intentions, create a more flammable Mt. Sutro than is there now.

Madeline Lynn Hovland  
for the Hills Conservation Network

**Additional References** (not included above)

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Quinn, Ronald and Sterling C. Keeley, *Introduction to California Chaparral*, UC Press, 2006.

[http://www.ptreyeslight.com/Point\\_Reyes\\_Light/Home/Entries/2010/12/23\\_Part\\_1\\_Myth\\_of\\_the\\_Eucalyptus\\_Blight](http://www.ptreyeslight.com/Point_Reyes_Light/Home/Entries/2010/12/23_Part_1_Myth_of_the_Eucalyptus_Blight) (also see Part 2, 12/30)

**From:** Mary Kahn <mhkahn67@yahoo.com>  
**Sent:** Tuesday, March 19, 2013 9:59 PM  
**To:** Campus Planning - EIR  
**Subject:** Fw: Don't Destroy Mt. Sutro Forest

----- Forwarded Message -----

**From:** Mary Kahn <[mhkahn67@yahoo.com](mailto:mhkahn67@yahoo.com)>  
**To:** "[Regentsoffice@ucop.edu](mailto:Regentsoffice@ucop.edu)" <[Regentsoffice@ucop.edu](mailto:Regentsoffice@ucop.edu)>; "[Chancellor@ucsf.edu](mailto:Chancellor@ucsf.edu)" <[Chancellor@ucsf.edu](mailto:Chancellor@ucsf.edu)>; "[EIRplanning@ucsf.edu](mailto:EIRplanning@ucsf.edu)" <[EIRplanning@ucsf.edu](mailto:EIRplanning@ucsf.edu)>  
**Sent:** Tuesday, March 19, 2013 10:14 AM  
**Subject:** Don't Destroy Mt. Sutro Forest

Please heed the information provided by those who are opposed to UCSF's devastating proposal for: Mt. Sutro. The beauty and respite the forest provides are obvious. Those matters aside, the forest assists in pollution control. It provides homes for a variety of animal species. It is a healthy forest which does not need to be, and should not be, replaced by "native species" (whoever defines them).

Mary Kahn

182 Delmar Street

SF CA 94117

**From:** John Knight <jmk0890@yahoo.com>  
**Sent:** Tuesday, March 19, 2013 8:21 AM  
**To:** Campus Planning - EIR  
**Subject:** Regarding Sutro Forest

Dear Diane Wong,

When a patient comes in with a complaint, is surgery the first course of action. Usually not! Unless it is a life and death situation, tests are done, charts are read carefully (I assume), and second opinions from experts are sought. If a top notch university and hospital follows these procedures for its own area of expertise, why can't it do the same for the Sutro Forest?

Dr Joseph Mascaro, a forest ecologist at the Carnegie Institution for Science in Stanford, California, wrote an expert rebuttal to the Draft Environmental Impact Report for the proposed mass cutting of Sutro Forest. He details two main points: 1) the University is not an expert in forests, their their management or their benefits to our society; 2) the draft is full of mistakes. Thus, I wonder where are the results of the tests done on our patient, the Sutro Forest? Has anyone read Dr. Mascaro's "chart" of the patient's condition and his second opinion of the results of this proposed radical "operation"?

Although I am not surprised by UCSF's actions since it is a wealthy and powerful institution, I am appalled at its inability to apply its own (I assume) standard operating procedures in another environment.

Do not cut when cutting is not needed! Remember, you are a public institution and our opinions (your public) need to be heeded.

Sincerely,  
John M. Knight

**From:** [Paul Knowles](#)  
**To:** [Campus Planning - EIR](#)  
**Subject:** Don't cut down the trees!  
**Date:** Tuesday, March 19, 2013 4:24:22 PM

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Please consider the many negative impacts of cutting down the mount sutro trees.

Thank you

Paul knowles

Sent via wireless telegraph.

**“Sometimes the experts get it wrong.”**

Piper Kujac  
[piper.kujac@gmail.com](mailto:piper.kujac@gmail.com)  
415.519-2711

Attention: Diane Wong  
UCSF Campus Planning  
Box 0286  
San Francisco, CA 94143-0286

Dear Diane Wong,

As a non-native San Franciscan, I was proud to be among a full house of conscientious nature lovers at the Public Hearing on February 25<sup>th</sup>, 2013, addressing University of California San Francisco's Draft Environmental Impact Report (DEIR) and forest management proposal for university-owned land on Mt. Sutro. I believe the arguments opposing this aggressive plan are strong, and I urge UCSF to carefully evaluate the consequences of their proposal, while revising the management plan to be a more sustainable approach, allowing the existing forest to continue to thrive. In summary, PLEASE allow for smaller distances between trees (to maintain as they are currently standing) and DO NOT USE PESTICIDES. No exceptions!

There are dozens of ecological (and logical) reasons for allowing the existing trees to grow in close proximity on the steep, wind-swept slopes of Mt. Sutro. I won't go into detail, as many of these arguments have been clearly outlined on the *Save Mt. Sutro Forest* website. I would like to add, however, that eucalyptus trees, according to David Milarch, founder of the Archangel Ancient Tree Archive, sequester more carbon than any other tree on earth, followed only by the giant sequoias. This seems to be reason alone to support the 'non-native' eucalyptus tree forest on Mt. Sutro, over any proposal to introduce low lying native plant life that arguably has very little societal benefits growing on this particular hill.

Furthermore, while I do not wish to draw attention to my personal story, I cannot help but draw a parallel between the UCSF's approach to managing its land on Mt. Sutro and my own experience with UCSF's approach to caring for my mother, who died under UCSF care last year, after a series of exploratory, aggressive, and unnecessary surgeries. While I do not question UCSF's rank in the top 10 hospitals for cancer treatment in the US, and we had many competent and qualified doctors evaluating my mother's case, the experts often disagreed and were clearly prescribing health care with dangerous consequences that weren't even fully known prior to prescribing them. I see the proposed forest management plan to be not unlike prescribing chemotherapy for cancer patients, where the 'treatment' is often more harmful than the cancer itself, and certainly not without consequences.

I have learned many times in my life, and again recently through my experience with UCSF, that sometimes the experts get it wrong. Common sense and logic should take precedent over any so-called management plan that calls for aggressive action with unknown benefits *and* consequences. I encourage those supporting of this management plan to re-evaluate its approach and work with nature, rather than against it, to ensure the long-term health of this ecologically rich 'non-native' forest. And please, DO NOT USE PESTICIDES. That is a stupid introduction to any forest.

Sincerely,  
Piper Kujac

References:

<http://www.ancienttreearchive.org/>  
<http://sutroforest.com/>



**From:** Bill Kwake <earthkwake@hotmail.com>  
**Sent:** Tuesday, March 19, 2013 10:23 AM  
**To:** Campus Planning - EIR  
**Subject:** Sutro Forest

To: Ms Diane Wong

I find it appalling that UCSF is wasting valuable resources, time and money trying to recreate pristine forest in the middle of a city! Sutro Forest is already a beautiful, well-balanced grove. The animals and insects living there do not seem to be complaining. The surrounding neighbourhoods have no complaints, yet, a few far-left whackos amongst you have swayed your judgement to leave well enough alone. It seems to me that UCSF has far more pressing issues to address than someone's personal agenda for pristine land in an already completely destroyed landscape. If you want to "save" this forest then you will have to raze the entire Bay Area and move all the humans out! How long will the pristine forest last anyway? How long before the hundreds of invasive plants already in the city move into this pristine place at the slightest shift of the wind? How much will it cost to maintain over time?

There seem to be more arguments against this proposal than for it. You are not seeing the trees for the forest. Most people are happy with Sutro Forest as it is. A few with influence are not. Leave well enough alone! If this absurd idea is carried out my continued support, and that of many of my friends, for UCSF endeavours will have to be re-examined.

Sincerely  
William E.Kwake

**From:** [Melissa Lareau](#)  
**To:** [Campus Planning - EIR](#)  
**Subject:** Sutro UCSF planning comments  
**Date:** Tuesday, March 19, 2013 10:18:39 AM

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Good morning,

It has come to my attention that some 30,000 trees are to be cut in UCSF's in a proposal. As a research institution I am surprised that this action is even being considered. Trees are the greatest source of carbon sequestering, as well as much needed habitat for wildlife. Death begets death and plans that include life begets more life. It is more than foolhardy to cut these trees- it is an act of environmental suicide. I can understand that our current model suggests infinite growth for 'land developers' and 'jobs' in the form of new construction practices, and yet we share only one planet where infinite growth is an absurdist perspective useful in post WWII economy. Here we are in 2013, understanding the impacts of our modern lifestyles (cars, planes, etc) which are outputting more carbon than ever. So, as a university that teaches science I expect to see a dramatic alteration of these plans that is in accordance with life. Round up and cutting perfectly healthy trees supporting a diverse thriving ecosystem creates death for everyone. Supporting these healthy ecosystems and even discovering ways, new ways to accomplish goals and meet the needs of the university, as well as the greater SF community, now sounds like progress. I know you can do this.

Melissa B. Lareau, M.A.

**From:** Thomas J Lee <tomlee@AI.SRI.COM>  
**Sent:** Tuesday, March 19, 2013 6:51 AM  
**To:** Campus Planning - EIR  
**Subject:** DEIR for Sutro Forest

I am writing to comment on the Draft EIR for the Mount Sutro Management Project.

- Fire risk mitigation is at best unnecessary, and at worst fear-mongering. There is no significant risk of fire in the area. To quote the report:

Though San Francisco's climate is moister than in most parts of California, this is still a factor in fire probability.

This characterization of moistness is a vast understatement, and disingenuous. The greatest risk of fire is in the hotter summer months. During these months the forest is inundated with fog and is perpetually wet. The canopy is soaked and dripping; the forest floor is mud. There is no evidence of any significant fire risk, at that time of the year or any other. The fire that occurred during the 1930s was during a logging operation. One might even claim that such activities planned by the Project could result in a short-term increase of fire risk.

There was an attempt a few years ago to obtain state funds to reduce the fire risk in the area by "thinning". This use of funds was wisely rejected by the State. This should be mentioned in the EIR.

- I have not seen an evaluation of the risk of mud slides, but I expect any significant deforestation or "thinning" would increase this risk. Hopefully the report will be amended to reflect such an evaluation.

- The Plan calls for use of pesticides. This is ill-advised in the center of an urban forest, and can have unpredictable results. It violates the precautionary principle for maintaining health in both humans and ecosystems, and no plan should be dependent upon their use.

- Little attention is paid to the preliminary attempts to introduce native trees to the area in the Rotary area, which have not been successful.

- The visual appeal of the forest would be wrecked during the Plan's operation; looking forward, it would be seriously compromised on a permanent basis.

- While it is the purpose of an EIR to evaluate large-scale changes, it is very difficult to do so for a delicate, urban ecosystem such as Sutro Forest. The EIR should acknowledge its limitations and note that there is high variance in the end result, leaving much doubt as to the final impact of the Project. The Project is essentially a gamble that, by spending a lot of money and 90% of the existing trees, there will be some sort of improvement in the future due to introducing many fewer, but native, trees.

Sincerely,  
Thomas J. Lee  
529 Dellbrook Ave.  
San Francisco

**From:** Gerard Livernois <gerardsf@gmail.com>  
**Sent:** Tuesday, March 19, 2013 4:19 PM  
**To:** Campus Planning - EIR  
**Cc:** Gerard Livernois  
**Subject:** ATTN: Diane Wong, Environmental Coordinator

Hello,

I have lived in San Francisco since 1997. I lived at Steiner and Fell for the first 6 years watching the fog interact with Sutro Forest. I now have an art studio at 18th and Treat (3150 18th St.) on the 5th floor facing directly west with a fantastic view of the tree line.

I have hiked through the forest regularly for the past 4 years. It has always been moist, full of wildlife and quiet. I thank you very much for affording me this experience.

**It would be a mistake to thin it out anymore than the current state.** Doing so would change the way the forest controls the fog heading over the hill. I have a solid three years of photos and direct experience watching the movement of the fog and Sutro forest. Previous years do not come with much photo evidence, but I can find some.

Thinning would cause the wind speed to increase and expedite the drying of undergrowth and increasing fire danger. Thinning would cause a change of weather for the neighborhoods to the east.

I attended and spoke at the public comment meeting in February. And I have read the draft EIR. The University is concerned with safety.  
Criminal activity is not prevalent in the area in part due to the few entry points and the thick undergrowth.

Please leave the forest in its current state.

And follow this link to find a building collection of photographic proof of the power the forest has with the fog. I have all the RAW files of the photos and with each day pictured many more within that timeframe.

<http://www.flickr.com/photos/gerardsf/sets/72157632985391052/>

Thank You,

Gerard Livernois  
1060 Howard St.  
San Francisco, CA 94103

415 385-7331

**From:** Tate Lizagub <tatelizagub@gmail.com>  
**Sent:** Tuesday, March 19, 2013 2:04 AM  
**To:** Campus Planning - EIR  
**Subject:** please dont cut trees

I stand opposed to UCSF's plan, cutting 30,000 trees will completely change the environment. The place is beautiful as is, please save our trees.

Tate Lizagub

**From:** Henry <lorrad@gmail.com>  
**Sent:** Tuesday, March 19, 2013 4:45 PM  
**To:** Campus Planning - EIR  
**Cc:** regentsoffice@ucop.edu  
**Subject:** Public Comment on DEIR for UCSF Mount Sutro Management Project

Dear Ms. Wong:

This is my public comment on the Draft Environmental Impact Report (DEIR) for the UCSF Mount Sutro Management Project.

I oppose the thinning of the trees in the Mt Sutro forest for the sake of native plant restoration (aka "biodiversity"). While it may not be native, the urban forest provides a novel and healthy ecosystem in the heart of San Francisco. Outweighing the "biodiversity" benefits is the forest's contribution to sequestering carbon, absorbing air pollutants and providing a healthy urban retreat for people and wildlife.

It is disheartening that such a reputable research and educational institution would undermine the institution's credibility by so unfairly misrepresenting the fire risk and health condition of this urban forest - just to sway public comments.

Regards,

Henry Lorenz  
San Bruno, CA

**From:** Lisa Magee <LMagee@fenwick.com>  
**Sent:** Tuesday, March 19, 2013 3:44 PM  
**To:** Campus Planning - EIR  
**Subject:** Please don't knock down the trees

Hello,

We've asked for the board to reconsider this plan to eliminate up to 30,000 trees before – and we ask again. Let's keep the trees in the Sutro Forest. We need as many green and living air cleansers as possible in a city that is so short of trees as it is. Thanks.

LDM

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March 19, 2013

Diane Wong, Environmental Coordinator  
UCSF Campus Planning  
654 Minnesota Street  
San Francisco, CA 94143-0286  
(415) 502-5952  
EIR@planning.ucsf.edu

Joseph Mascaro  
Postdoctoral Associate  
Department of Global Ecology  
Carnegie Institution for Science  
260 Panama St.  
Stanford, CA 94305, USA

Dear Ms. Wong,

At the public hearing, I submitted a statement regarding three concerns I have over the proposed management activity for Mount Sutro as presented in the draft environmental impact report (hereafter DEIR). I would like to expand my remarks regarding these three areas of concern: (1) fire risk, (2) carbon storage, and (3) biodiversity and character. I would also like to refer USCF to an op-ed I published, primarily dealing with biodiversity and character, in the *San Francisco Chronicle* on February 23, 2013, and ask that all remarks be included in the public record (I do not hold copyright on the *Chronicle* article, and thus I cannot attach it to this letter).

I wish to deliver my expert opinion as an ecologist, but please note that my views regarding Mt. Sutro are not endorsed by, or affiliated with, the Carnegie Institution for Science.

I have worked in forest ecosystems throughout the United States, as well as tropical forests in Central and South America, Oceania and Australia, where I worked in forests dominated by eucalyptus and acacia species. Having experienced conditions in eucalyptus forests in their native habitat, I believe the management objectives of the draft environmental impact report by the University of California, San Francisco will have three significant and unnecessary negative impacts on the environment, and in light of these negative impacts, I strenuously object to the proposed management activity.

### **1. Fire Risk**

The DEIR argues the proposed management activity, namely thinning and understory removal, will lower the risks of fire. However, the DEIR presents a biased picture of present-day fire ignition risks in the Mount Sutro forest that calls this conclusion into question. The DEIR does not sufficiently address the possibility that the thinning activities will increase the risk of fire, by



increasing surface temperature, reducing humidity, increasing wind penetration, and reducing fog drip. Some examples:

1. The primary history of fire on Sutro comes from the earliest years of the planting (e.g., in 1899, DEIR, 4.7-5), when it was much younger and lower to the ground, presumably creating less fog interception, allowing for a greater amount of wind penetration, and containing drier fuel for a greater portion of the year.
2. The 1934 fire, according to the report, was related to logging activities [p.475].
3. The report exaggerates the number of dead trees in the forest, referring to anecdotal accounts when the report's own plot inventory data indicate only two standing dead individuals; less than 2% of the trees inventoried were standing dead. This is in no way unusual and in and of itself is not an indicator of an unhealthy forest.
4. The report cites the SF Hazard Management Plan as saying: "Certain types of plants are more susceptible to burning or will burn with greater intensity; and nonnative plants may be more susceptible to burning than native species." [4.7-9] There is no ecological evidence to support this statement regarding nonnative plants. Origin (native or nonnative) is not an indicator of flammability<sup>1</sup>; this is determined by functional traits, and many California species are either fire dependent or highly flammable, including native grasses and oaks.
5. The report notes that high temperatures, high winds, and lower humidity all increase the risk of fire, and notes specifically that "Forest thinning activities would allow increased wind penetration within the reserve." [4.7-12]. Yet, the report continues to argue that there is no evidence this increased wind penetration would increase the risk of fire, and presents no evidence to support this claim. The report's mitigation measure cited in [4.7-12] is the cutting of more trees that are further damaged by wind as a result of the original thinning: "After thinning, the project area would be regularly monitored by an urban forester or arborist to access tree health and condition. Trees prone to windthrow, e.g. dead or diseased trees or those occurring on steep slopes with limited soil for rooting, and considered a hazard to people or structures would be removed. The implementation of this measure would reduce the short-term impact of windthrow to a less than significant level." [4.11.5]
6. Figure 2-8 shows the condition of trails late in the dry season, prior to the first rain, suggesting that the puddling of water is caused by fog interception, which itself is provided by the non-native vegetation. Yet, this evidence is used to speak to flooding concerns rather than fire risks.

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<sup>1</sup> e.g., Davis MA, Thompson K, & Grime JP (2001) Charles S. Elton and the dissociation of invasion ecology from the rest of ecology. *Divers. Distrib.* 7(1/2):97-102.

*There are many methods by which fire risk can be assessed scientifically<sup>2</sup>, yet the DEIR cites no previous fire risk assessments for Sutro and proposes to conduct none in the future. Among the monitoring activities suggested for the demonstration project areas, no effort is suggested to scientifically and experimentally evaluate the impact of the management activity on temperature, humidity, wind, fuel loads, duff combustibility, or other metrics that might indicate changes to the risk of fire ignition or fire spread. Why? If the purported goal of the activity is to reduce fire risk, why are no measurements or scientific assessments of fire risk planned?*

Instead, the report suggests that the demonstration areas be monitored anecdotally by a forester or arborist in order to determine whether the trees have been effectively killed, and to identify more hazardous trees to cut. As written, the proposed demonstration areas have no ability to demonstrate changes to fire risk because no scientific assessment is planned.

## **2. Carbon Storage**

The DEIR presents a picture of poor carbon accumulation for the Sutro forest that is highly suspect. Several unsubstantiated assumptions are made, and contrary evidence is ignored. For example:

1. The DEIR assumes that the Sutro forest is no longer accumulating carbon, and that its trees are no longer growing: "...it is assumed here that the age of the Reserve's largest trees (>115 years old) exceeds the age at which eucalypts continues to add significant annual increment or diameter (or height)." [Page 4.6-19]. No evidence is provided to support this statement. In fact, much of the Sutro forest is less than 100 years old, as demonstrated by the 1935 logging activity and aerial photograph. Even the portion of the forest that is ~115 years old or older is very likely to be accumulating carbon, because eucalyptus may reach several centuries in age.<sup>3</sup> Even at maturity, many old-growth forests continue to accumulate carbon.<sup>4</sup>
2. The report states that "At this time, reports suggest that ongoing mortality is occurring in the Reserve..." [4.6-19], yet only one anecdotal account is cited. The vegetation census that was conducted indicates a very low percentage of standing dead trees (< 2% and only 2 standing dead individuals were measured), which is in no way indicative of high mortality.
3. The report assumes that the thinning will enhance understory recruitment of trees which will increase carbon accumulation. No evidence is provided for this assumption beyond anecdotal speculation [4.6-20].

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<sup>2</sup> e.g., Yebra, M et al. (2008) Estimation of live fuel moisture content from MODIS images for fire risk assessment. *Agriculture and Forest Meteorology* 148(4):523-536.

<sup>3</sup> Little EL, Jr. & Skolmen RG (1989) *Common forest trees of Hawaii (native and introduced)*. (U.S. Department of Agriculture, Washington, D.C.) p 321.

<sup>4</sup> Chave J, et al. (2008) Assessing evidence for a pervasive alteration in tropical tree communities. *Plos Biology* 6(3):455-462.

***There are established methods by which carbon accumulation can be assessed<sup>5</sup>, yet the DEIR reveals that no scientific assessment of the rate of carbon accumulation on Mount Sutro has been attempted.*** The DEIR presents only static vegetation data from six plots (these would need to be monitored over time in order to make a first approximation of carbon accumulation), and scattered anecdotal evidence.

Forest succession in novel ecosystems is unpredictable.<sup>6</sup> The changes to light availability, wind penetration, humidity, temperature, and biological diversity resulting from the heavy thinning activity proposed may have unforeseen consequences vis-à-vis carbon storage and accumulation, potentially causing carbon stocks to decline more than anticipated due to increasing exposure, and a more edge-like forest state.<sup>7</sup>

### **3. Biodiversity and Character**

The DEIR presents several inaccuracies or unsubstantiated statements regarding the biological diversity of Mount Sutro. As with many other sections, much of what is presented is anecdotal. For example:

1. The report states that “Native insect [diversity] within the Reserve is expected to be low because of the dominance of non-native eucalyptus.” No evidence is provided to support this statement [4.3-5], and evidence exists to the contrary.<sup>8</sup>
2. The report states that “Although no amphibians and reptiles were observed during LSA’s site visits, the dense understory and the eucalyptus forest is likely to support common, urban-adapted species...” [4.3-5]. Why was the protocol not revised in order to census these important groups? Assuming that only “common” species are present is the surest way to avoid being surprised by a novel forest ecosystem. Rarity is always hard to find.

***While the effort presented in the DEIR is not trivial, it is insufficient to evaluate what species may be lost or harmed by the proposed management activity. Without a robust initial census, it will be impossible to determine how the management activity alters the biological diversity of Mount Sutro.***

The DEIR points to the “hands-off” area as a site for future comparisons with regard to the effects of management on diversity and other properties. However, the proposed hands-off area is confounded relative to the other management areas, and will make any future assessments on the effects of the management activity statistically unsound: the hands-off area is among the

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<sup>5</sup> Clark DA, *et al.* (2001) Measuring net primary production in forests: concepts and field methods. *Ecological Applications* 11(2):356-370.

<sup>6</sup> Ewel J (1980) Tropical succession: manifold routes to maturity. *Biotropica* 12(2):2-7.

<sup>7</sup> Laurance WF, *et al.* (1997) Biomass collapse in Amazonian forest fragments. *Science* 278(5340):1117-1118.

<sup>8</sup> Sax, D. (2002) Equal diversity in disparate species assemblages: a comparison of native and exotic woodlands in California. *Global Ecology and Biogeography* 11:49-52.

thinnest of all the demonstration areas, and is the only one that is largely adjacent to the forest edge—factors that strongly influence forest community structure and ecosystem properties.<sup>9</sup>

Regarding the character and intrinsic value that may be harmed by the proposed management activity, I refer to the aforementioned article in the *San Francisco Chronicle*, 23 February, 2013.<sup>10</sup>

I appreciate UCSF considering these and other comments in their evaluation of management plans. I wish to emphasize that I recognize the importance of forest management to protect human health and ecosystem services. I also agree that diversity conservation is a top-priority. Yet, in my view, the proposed management activity for Mount Sutro is highly likely to result in negative effects on fire risk, carbon storage, and biological diversity.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Joe Mascaro', with a long horizontal stroke extending to the left.

Joe Mascaro

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<sup>9</sup> Laurance WF, *et al.* (2004) Pervasive alteration of tree communities in undisturbed Amazonian forests. *Nature* 428:171-175.

<sup>10</sup> <http://www.sfgate.com/opinion/openforum/article/Dear-UCSF-Sutro-Forest-is-off-limits-4301650.php>

From: [Lydia K McNiel](#)  
To: [Campus Planning - EIR](#)  
Subject: what sutro forest means to me  
Date: Tuesday, March 19, 2013 3:05:58 PM

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Dear Diane Wong,

I'd like to share my personal reasons for so strongly opposing the plans to deforest San Francisco's eucalyptus, particularly Sutro Forest.

Almost every time that I think about the innocent years of my childhood, Mt. Sutro is somewhere in the background. Now that I think about it, my whole life took place next to that mountain. My house on the west side, dad's work on the north side, nursery school on the east side. I would just sit at the window and stare at the mountain some days, already aware it was something special. I'd always encourage my dad to drive the long way to work, all the way through the forest. There is just something so magical about that drive, aware of the surrounding city but seeing nothing but trees. I have never lost my love for those trees. However irrational it may sound, the eucalyptus feel like a part of me; a part of me that would die with the forests.

These massive forest are also an integral piece of San Francisco, an indispensable part of the landscape. One of the reasons I am so very grateful for my SF childhood is the combination between urban bustle and genuine nature. We get the advantages of city life without the being stifled by endless concrete.

I am the most mystified by those who aim to restore the "natural habitat", which plays a major role in other deforestation projects, such as Mt. Davidson. The logic of this argument does not add up as far as I can tell. I am a little bit baffled every time anybody uses the "invasive species" label to convince people of their terribleness. How can anybody say that with a straight face? This is a CITY we are talking about, I think we all know which species has done the "invading" here.

And then there is the little issue of "restoring the natural habitat". I won't even get into all of the money, pesticides, oxygen, etc. issues that would accompany such projects. My major question is why anybody would pick this as their crusade. Why make our beautiful, ecological, historic forests with bald dead-looking domes? It's not as if we don't have that, twin peaks is lovely. If somebody really wants to see some natural habitat...there is plenty right across the bridge.

My last bit is about the historic value of our forests. They have been here longer than any of us have, survived the earthquake, and given us beautiful nature in our backyards. Throughout over a hundred and thirty years, the forests have managed to avoid any catastrophic fires. If the fog goes away or we reach a time when the climate would make such fires probable, it will be a different story (not to mention the increased risk associated with the landscape that would replace the forests).

I apologize for the length, I thought that it wouldn't be so bad after leaving out so many of the other issues that others have surely covered.

If you have read this far, I sincerely thank you. I just wanted to add my feelings to the discussion, and cannot express how extremely

important this is to some of us.  
Best of luck.

Sincerely,

Lydia

**From:** eric <emiller1@gmail.com>  
**Sent:** Tuesday, March 19, 2013 12:57 PM  
**To:** Campus Planning - EIR  
**Subject:** Mount Sutro DIER Comment - civil and potential criminal liability risk to UCSF

Dear Environmental Coordinator Diane Wong and UCSF Senior Management,

Let's forget about the massive environmental blunder your plan to cull tens of thousands of trees from Mt. Sutro represents. Even if UCSF could care less about damaging city air quality, wiping out habitat, and increasing carbon emissions I'm sure your lawyers may understand civil and potentially criminal liability.

Fire risk factors do include trees (potential fuel) but UCSF clearly and wantonly ignores wind speed and forest moisture as key factors. Keep in mind any potential jury won't be comprised of a bunch of native plant fanatics and/or those with a bias against eucalyptus; you risk getting people who are going to listen to the facts following any significant fire.

The jury is going to hear UCSF rejected FEMA's feedback, CAL FIRE's risk rating, and other facts presented by opponents to this plan (a small sample below).

*In fact, both Angel Island and the Oakland fire are counter-examples. Angel Island was covered with eucalyptus trees for decades. During that time, the only reference we could find to fire was a fire in a building. Since the trees were removed, there have been a number of fires, culminating in the October 2008 fire – which burned the grass and shrubs and stopped at the tree-line.*

*The Oakland fire also started with shrubs and grasses. It spread to trees and buildings, but the trees were victims of the fire, not the cause of it. The main fire spread from house to house. A report on that fire, from David Maloney who was on the investigative task force, clarifies that eucalyptus is not particularly flammable.*

It is quite clear that this plan will dry the remainder of the forest and allow for much faster wind speeds. If UCSF drastically alters the forest based upon native plant bias, the equivalent of eucalyptus urban legends, or other spurious motivations, UCSF faces huge civil liability following any large fire. Although criminal liability risk is probably low, one can imagine a level of public outrage that may place senior UCSF officials behind bars – if the resulting fire takes enough lives. After all, UCSF management has been presented the fire risk facts it will be judged by - literally.

Sincerely,

Eric

Eric Miller

Office: 650 308 4999  
Mobile: 925 324 5527

901 Mission Street, Suite 105  
San Francisco, CA 94103

**From:** Bruce Mitchell <bruce.bruce-mitchell@gmail.com>  
**Sent:** Tuesday, March 19, 2013 5:54 PM  
**To:** Campus Planning - EIR  
**Subject:** Mt. Sutro Forest

Diane Wong  
UCSF Environmental Coordinator

Dear Ms. Wong:

I am writing to express my sincere concern about the possible removal of trees in the Mt. Sutro forest.

This seems like a very negative development with permanent impossible to remedy very negative consequences.

I sincerely hope that UCSF not take any such action.

Best regards,

Bruce Mitchell  
1854 Golden Gate Ave.  
San Francisco, CA 94115



From: [SES](#)  
To: [Campus Planning - EIR](#)  
Subject: Public comment - Sutro Forest DEIR  
Date: Tuesday, March 19, 2013 3:08:27 PM

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To Diane Wong, UCSF Environmental Coordinator:

We are writing to submit a public comment on UCSF's Sutro Forest DEIR. With ecological preservation in mind, it is troubling that the DEIR suggests the moist Sutro cloud forest is a fire hazard. As well, the Sutro forest, left intact, does essential work of sequestering carbon in our precious city. Another way to put this is that every bit of forest and stand of trees that we still have here in San Francisco is a vital part of keeping our air quality at optimum levels. This is for all of us - adults and children, tourists, other visitors, wildlife. In the long run, it will always be better for the city's ecology and economy to preserve as much green space as possible - it can never be replaced.

Whether scientific details of how ecological networks function are familiar or not, there is simply no way that removing so many trees and the other life they protect can be an advantage for UCSF or San Franciscans. If there are aspects of the Sutro cloud forest that need attention, such as balance of non-native insect species, there are many established and safe ways to address such issues.

If the decision makers on this proposal decide to preserve life rather than felling all those trees, you will all be heroes, to both the UCSF and wider San Francisco communities. We will all have a decision - with profound long-term effects - to be proud of.

Thank you,

Sarah E. Steinberg  
1241 Guerrero St Apt B  
San Francisco, CA 94110

Andrew Flurry  
437 Gates St  
San Francisco, CA 94110

Gabrielle Toadlena  
437 Gates St  
San Francisco, CA 94110

Priscilla Jayne  
416 Duncan St Apt 5  
San Francisco, CA 94131

Maryam Eskandari  
19 Ramona Ave #5  
San Francisco, CA 94103

Lara Otte  
1037 Dolores St  
San Francisco, CA 94110

Katharine Daugherty  
157 Capp St

San Francisco, CA 94110

**From:** David Nielsen <dbnielsen@gmail.com>  
**Sent:** Tuesday, March 19, 2013 3:22 PM  
**To:** Campus Planning - EIR  
**Subject:** Draft EIR comments

Dear Ms. Diane Wong---

As a resident of Edgewood Avenue, I am writing to express my strong concern about UCSF's proposed forest management program for Sutro Forest, as detailed in the Draft Environmental Impact Report.

UCSF intends to use herbicides to destroy the ground cover and prevent regrowth. Extensive herbicide usage is fundamentally at odds with the values and mission of a public health university. The EIR contains 30 pages describing the protective measures to be put in place when using herbicides in the reserve. If the plan is safe, why is the background and mitigation plan so complicated?

UCSF intends to destroy up to 60% of the trees in the forest. Destruction of a forest is fundamentally at odds with the values and mission of a public health university.

UCSF should actively manage Sutro Forest to maintain accessibility and forest health. These objectives can be attained without the destruction of the healthy ecosystem in place today, and destruction of a historical forest that is so closely tied to the history of San Francisco.

Regards,

---David Nielsen  
150 Edgewood Ave  
San Francisco, CA 94117  
[Dbnielsen@gmail.com](mailto:Dbnielsen@gmail.com)

See below for specific comments / questions to the Draft EIR:

Section 2.2, page 2-1 states that up to 60% of the trees may be removed under the implementation of the plan, which has been estimated to be up to 27,000 trees. UCSF has denied this figure. Please confirm the number of trees that will be destroyed under full implementation of the plan.

Section 2.2.1.2, page 2-3. Edgewood project focus on acacia trees. Please confirm why these trees will be removed, if the issues in the report are focused on the blue gum eucalyptus.

Section 2.2.1, all categories. If fire the primary concern for vine removal, please confirm how cutting the bottom 8-10 feet of the vines on trees will lower fire risk in the canopy. The vines will die and remain attached to the trees for many years to come. Dead vines are a significantly higher fire risk than living vines. Dead vines will mar the beauty of the forest.

Section 2.2.5 Best Management Practices. Section 1 implies that disturbance to existing grades will be minimized during tree removal. On March 8 – March 16 2013, UCSF engaged in tree removal in the Edgewood project area, hiring Bartlett Tree Company to take down several Eucalyptus trees. This process caused extensive disturbance to the undergrowth in and around the work area. Large logs were dragged across the undergrowth, destroying plant life and significantly scarring the landscape. Please confirm how this removal work ties into the Edgewood project plan, how work will be managed in comparison to the Bartlett work method, and how undergrowth will be restored.

Section 2.3, project objectives. Safety: To reduce fuel load and potential wildfires. Please comment how killing vine growth on trees reduces fuel load. Dead vines pose a greater fire risk than living vines. Please confirm the fire risk at the forest reserve. CalFire rates Sutro Forest as a "Moderate Risk" hazard, which is no different than its rating of the Presidio or Lands End. Please comment on why the fire risk at Sutro is high enough to warrant significant tree removal. Please confirm the data source when commenting on fire risk. (CalFire map: [http://frap.cdf.ca.gov/webdata/maps/san\\_francisco/fhszl06\\_1\\_map.38.pdf](http://frap.cdf.ca.gov/webdata/maps/san_francisco/fhszl06_1_map.38.pdf))

Heath: Please comment how the destruction of up to 60% of trees in the forest improves the health of said trees.

Aesthetics: Please comment how killing vine growth will improve forest aesthetics. The management plan intends to remove the bottom ten feet of vine growth. These vines extend over a hundred feet into the air. How does the creation of 90+ foot tall dead vine columns improve the forest aesthetics?

Section 2.7: Please provide an estimate of the total number of trees to be removed in the reduced project alternative scenario (in comparison to the 60% estimate in the baseline scenario)

Section 4.1.3.1. University guidelines dictate that UCSF maintain the overall forest character and visual backdrop of the hilly reserve.

Please confirm how elimination of 90% of the understory and up to 27,000 trees maintain the forest character.

Figure 4.1-17: This figure is cited as an example of healthy forest management: "*As can be seen in Figure 4.1-17, the result was a less dense forest, but one that maintained the pleasing aesthetic qualities of a forest while allowing light and air to reach the forest floor.*" The usage of this image is misleading, as the spacing shown is significantly different than what has been described in the plan. Please comment on the spacing shown in this image, please compare to the 30 and 60ft spacing in the management plan. Please provide an image of 30 – 60ft spacing in a eucalyptus forest.

Figure 4.1-18: This figure is cited as an example of healthy forest management. The usage of this image is misleading, as the spacing shown is significantly different than what has been described in the plan. Please comment on the spacing shown in this image, please compare to the 30 and 60ft spacing in the management plan. Please provide an image of 30 – 60ft spacing in a eucalyptus forest.

Impact AES-2, page 4.1-17, presented in full with comments in bold:

*The proposed project could substantially degrade the existing visual character or quality of the site and its surroundings. (Less than Significant)*

Most Demonstration Project activities would have little effect on the visual qualities of the

Reserve when viewed from off-site. **[Impact is not defined specifically as off-site. Please expand the response to assess the on-site visual impact].** Demonstration Project areas comprise about 7.5 acres of the 61-acre Reserve, and are located primarily within the interior of the Reserve. However, visual changes could be noticeable at the southern tip of the Demonstration Project 1 South Ridge Area, which is located in close proximity to the southern border of the campus at Christopher and Crestmont Drives. This location could be visible from points south of the Reserve. Persons viewing this section of the Reserve may notice fewer trees at this location and a less dense forest, particularly during initial implementation. **[This response is saying that the impact is less than significant since impacted areas will not be visible. However, the stated intent of the forest management plan is to extend its application to the entire forest.]** Over time, as remaining trees have more access to light, water and nutrients, remaining trees are expected to become healthier and new branch/canopy growth would be expected. **[This statement does not address the question directly. Will the project degrade the existing visual character and quality of the site?]** Nonetheless, the project would result in reduced vegetation density compared to existing conditions. **[Given this statement, how is the impact Less than Significant?]**

Continued vegetation management activities throughout the remainder of the Reserve, including tree-thinning, understory removal, and new trails would have some effect on the visual qualities of the Reserve when viewed from off-site. **[Please define these effects]** As demonstrated in the real-world examples of tree thinning projects presented above, the proposed project would result in a more visually open, less dense forest. As indicated above, the greatest visual change would occur during the initial implementation when understory and tree thinning are first undertaken. **[As noted above in my comment, these pictures are not representative of 30ft and 60ft spacing. Please provide images that correspond to the thinning in the forest management plan, and comment on the comparison.]** Over time, as remaining trees have more access to light, water and nutrients, new branch and canopy growth would materialize, and the visual effect of vegetation management activities would be less dramatic. **[If the impact of the plan is “less than significant” please explain how the visual effect of vegetation management activities would be less “dramatic”. A less than significant impact should not be dramatic.]** In addition, continued vegetation management would be expected to be performed in phases, depending on the availability of funding, and would not be implemented at once. **[The impact of the plan is “less than significant” because the plan won’t be implemented. It is UCSF’s intention to implement the plan across the entire forest. Please explain].** Following continued vegetation management activities, the Reserve would retain its forested appearance.

For the reasons stated above, the proposed project would not substantially degrade the existing visual character or quality of the site and its surroundings. **[The reasons stated above say that the plan will cause a significant visual impact, but the impact won’t be as significant since the test areas aren’t visible from the street and a funding shortfall will limit the implementation of the plan. Please explain how this impact is rated at less than significant if it is UCSF’s intention to implement the plan across the forest.]** Therefore, impacts on aesthetics and visual quality are less than significant. **[Does not follow the logic presented above].**

Impact AES-3, page 4.1-18. San Francisco evaluated the removal of 140 trees out of 5800 (2%) in the Interior Greenbelt and deemed the impact less than significant to the visual character of the surroundings. UCSF intends to remove up to 60% of 45000 trees (27,000). Please advise how the assessment by the city of SF is relevant to the UCSF project. I ask that you visit the interior greenbelt on the trail between the Edgewood and Stanyan trailheads, and confirm whether the impacted area represents a less than significant level of visual impact. The city has conducted tree removed on the slope below the UCSF Chancellor residence.

4.2.3. To accomplish thinning, the project will employ a single brontosaurus mower. Please confirm how this piece of machinery can be deployed and yet comply with the Best Management Practices cited earlier, especially given the mountainous terrain of the Forest Preserve.

4.3.3.2. Wildlife.

Please confirm how the destruction of 90% of the understory and up to 60% of the forest (27,000 trees) will not have a significant impact on wildlife habitat. Please comment on the impact of the proposed project on each of the bird species highlighted in the report. Please comment specifically on the impact of the east bowl demonstration project on the availability of habitat for the Olive-side flycatcher, a California species of concern.

Mitigation Measure BIO-4a/b: Please comment on how the destruction of 90% of the understory and 60% of the forest (up to 27,000 trees) will not impact the nesting ability of birds in future nesting seasons.

Page 4.7-4. *“Commonly during this period, the semi-permanent low pressure system of the southwestern United States weakens and the Pacific high pressure system shifts inland, allowing hot, dry, high-intensity winds to blow in from the northeast. These winds, in combination with unusually high air temperatures, low humidity and dry vegetation increase the vulnerability of the Reserve to wildfire for several weeks in the autumn.”*

Please comment on the duration of this risk period. Please provide the data to support the characterization of the hot, dry, high-intensity NE winds. The language in this section is ambiguous. Calfire rates the fire risk of the preserve as moderate, its lowest hazard risk rating system.

Page 4.11-11. Wind measurements were taken for 39 days. Please comment on how this data sampling period was selected and why it accurately captures the seasonal weather conditions of San Francisco.

Impact NOISE-1. Please comment on the significant and unavoidable impact of the thinning activities on the noise levels on Edgewood

Avenue.

The University shall continue efforts to upgrade and replace rooftop mechanical equipment to reduce over time ambient noise levels to achieve

the 50/55 dBA goal.

Please comment on the time frame the University will make these changes. Please confirm that “continued efforts to upgrade and replace” can be read as a firm commitment to reduce noise levels to 50 dBA

**From:** Victor Ortiz de Montellano <victor\_odem@yahoo.com>  
**Sent:** Tuesday, March 19, 2013 4:12 PM  
**To:** Campus Planning - EIR  
**Subject:** Comment re: Sutro Forest DEIR

I am a San Francisco resident and hiker. I agree with the concerns of the San Francisco Forest Alliance (detailed here: <http://sutroforest.com/2013/03/15/flaws-in-ucsfs-sutro-deir-public-comments-due-19-march-2013/>) regarding UCSF's plans to fell up to 30,000 trees in Sutro Forest. I believe the draft EIR is seriously flawed for the reasons identified by the Forest Alliance.

Thank you,  
Victor Ortiz de Montellano  
119 Corwin St. #2  
SF, CA 94114

**From:** Kelsey Parker <kelseysp@gmail.com>  
**Sent:** Tuesday, March 19, 2013 7:01 AM  
**To:** Campus Planning - EIR  
**Subject:** Don't cut down the trees in Sutro Forest!

### **EXAGGERATED FIRE HAZARD – AND HIGH-RISK “SOLUTION”**

The DEIR **exaggerates the fire hazard** – and its Plan will actually increase the risk by making the forest much drier and windier. (There's a statement from a professional forest ecologist [HERE](#).)

The arguments in the DEIR repeat those in the FEMA application: Eucalyptus is uniquely flammable owing to shed bark and oils within the leaves; dense forests are more flammable than open ones; that fires in the forest in 1899 and 1934 indicate its vulnerability; that the fires on Angel Island and Oakland are examples of fires that could occur in Mount Sutro Forest; that hot dry northeast winds in autumn cause a period of vulnerability for “several weeks.” **We thought we had already answered those arguments** in this post: [UCSF, Sutro Stewards, and the Fund-Raising Fire Hazard](#), and in this earlier post, [Mt Sutro: The Fire Hazard That Wasn't](#).

Sutro Forest is a de-facto Cloud Forest. It gets 30-40% more moisture than surrounding areas by catching moisture from the fog, which it then holds in its duff and understory. (We have an [illustration of the process HERE](#).) ***This may be the wettest part of the city that isn't actually under water.***

According to CALFIRE, the hazard rating for Mount Sutro Forest is “**moderate**” – **its lowest risk rating**. The DEIR seeks to dismiss this by saying the map is a draft and could change. However, CALFIRE also noted: “**Update, 11/2008: CAL FIRE has determined that this county has no Very High Fire Hazard Severity Zones in LRA [Local Responsibility Area].**” That covers Mount Sutro Forest. Clearly, in CALFIRE's assessment, there is no Very High Fire Hazard.

San Francisco city **does not get hot dry northeasterly winds** (commonly called ‘Diablo’ winds); even when the East Bay has these conditions, the city remains cooler. According to the 2001 Plan, the vulnerability is for “up to ten days in the autumn.” In 2009, we maintained a daily FogLog during this so-called ‘period of vulnerability’ and recorded only 7 dry days – i.e. days when neither fog nor rain provided the forest with moisture. **It will not dry out in 7-10 days in its natural state.**

**The fire hazard can be raised, however, by “thinning” the forest.** This will dry out the “thinned” areas, and increase wind-speeds, thus increasing the likelihood that fires will spread if they start. So far, there have been – we are told – 3 small fires, the last in 1999. It was extinguished in 20 minutes. Had the forest had been drier and windier, and had it been a fire of grass and shrubs, it could have spread rapidly as the Angel Island fire did.

In fact, **both Angel Island and the Oakland fire are counter-examples**. Angel Island was covered with eucalyptus trees for decades. During that time, the only reference we could find to fire was a fire in a building. Since the trees were removed, there have been a number of fires, culminating in the October 2008 fire – which burned the grass and shrubs and stopped at the tree-line.

The Oakland fire also started with shrubs and grasses. It spread to trees and buildings, but the trees were victims of the fire, not the cause of it. The main fire spread from house to house. [A report on that fire, from David Maloney who was on the investigative task force, is HERE](#). It also clarifies that eucalyptus is not particularly flammable.

The weather conditions in Oakland and on Angel Island are also completely different from Mount Sutro's. Both those places have more extreme and drier weather. Sutro Forest's uniquely wet micro-climate is not comparable – though once the forest has been thinned and dried out, the comparisons might be closer.

You can already see evidence of this drying on the new trail from Stanyan, [where 50 trees were cut along the trail](#), thus opening huge gaps in the canopy. A lot of understory was also removed. The forest is visibly drier there than in the more enclosed parts. Even the DEIR says it's the South-facing slopes that are warmer and drier, in fact it's the open areas on the east side that are dry now. A walk along the Historic Trail illustrates this as well – the path can change from dry dust to damp earth within a few

inches, depending on the state of the forest. If the whole forest is made as dry and dusty as these areas, by removing thousands of trees and nearly all the understory, the hazard could increase.

Incidentally, during the public meeting prior to that trail being built, Ray Moritz, who is UCSF's hired arborist, also made a presentation as a fire ecologist and [declared the fire hazard to be low](#).

### **CARBON SEQUESTRATION**

With global warming, carbon storage is becoming an increasingly important issue. In fact, California has a specific law about it: AB32. UCSF also has a policy to reduce greenhouse gases.

Eucalyptus trees are excellent carbon sinks: They grow large and fast, the wood is dense, and they're long-lived in wet conditions like Mount Sutro (around 400-500 years). The acacia understory makes the forest even better at sequestering carbon; acacia is a nitrogen-fixing tree, so both the eucalyptus and the acacia grow better together. They also store more carbon in the soil. Obviously, felling these trees will be a double whammy. They won't be pulling more carbon out of the air. Instead, they'll be chipped and mulched and decaying – and thus releasing carbon.

**The DEIR makes several mistakes as it attempts to wiggle its way out of this dilemma:** chopping down thousands of trees and leaving them to decay, vs the negative carbon impact. Here's what it does: First, it **underestimates the carbon stored in the forest, and continued sequestration**, in six ways:

- It uses calculations based on six tiny cherry-picked plots (one-tenth of an acre each) that had fewer and smaller trees (**averaging 175 trees per acre instead of 740 trees per acre for the whole forest!**);
- It **calculates the tree-loss per acre based on the 175 trees/ acre** and estimates 62 trees per acre will be left standing – so only 113 trees per acre are felled instead of 678
- It **excludes all trees under 5 inches in diameter**;
- It **excludes understory vegetation** because it's only 5% of the total carbon storage;
- It **ignores soil storage** (about 50% of a forest's carbon storage) because it's stable, even though the kind of activities planned for the Reserve **would undoubtedly cause soil disturbance and release carbon**; and
- It uses a calculation based on 40% of the wood from felled trees being used for timber (like for furniture) – which of course means the carbon is stored for a much longer time than if the tree is in woodchips decaying on the ground. It reaches a conclusion that the short-term reduction in carbon storage would be 29% of the forest's total storage – 11,286 tons (or 10,239 metric tons) of carbon dioxide.
- It argues that mature trees have stopped sequestering carbon, while young trees would absorb carbon at higher rates. This is only true if trees stop growing; but there's no evidence that these trees have. They are young for eucalyptus trees, which can live 400-500 years. In fact, since trees absorb carbon in proportion to the wood they add, the larger trees may be absorbing carbon at a lower rate than small trees, but actually taking in a larger amount.

**Second, it looks at a 30-year scenario (the projected life of the Plan), and divides the carbon storage loss by 30. We are not sure where the 30-year project life comes from.**

**Third, it argues that over 30 years, the carbon storage capacity will recover. The trees will be thinned the trees that remain will be healthier and grow larger, (despite the risk of wind throw killing remaining trees, and destruction by herbicides through the intergrafted root system). Because the understory will be destroyed, they say, new trees will be able to grow (despite the thick layer of eucalyptus chip mulch and the plan to poison them or yank them to prevent them from growing.) It also claims reduction in tree mortality because there'll be fewer pest infestations (which don't actually exist now, but are speculated about).**

### **HEALTH OF THE FOREST**

**The DEIR claims the forest is unhealthy, with overcrowding, dying trees, and an infestation of various insects including of snout beetles in some areas.**



- We wonder if UCSF had an entomologist look at the beetles, because snout beetles have mainly been seen in Southern California. In any case, they are readily controlled through release of a parasitic wasp. (This [UC Davis publication](#) has details.)
- Except for major infestations, it's normal for a forest to have insects – they're part of the ecosystem, in fact, the foundation of it.
- The DEIR states that the forest is crowded because eucalyptus is well-adapted to the site, it's very prolific, and re-sprouts vigorously. This does not sound exactly like ill-health.
- Some trees – especially the thin saplings that have not reached the canopy – are dead or dying. This is a natural process of self-thinning. It is better than the artificial thinning proposed in the Plan, because the forest varies greatly in terms of topography, wind, temperatures, and other growing conditions. The trees that flourish are best adapted for that particular space.
- The DEIR mentions that new trees are not growing into the canopy. We cannot see why this is an issue, since the tree density is considered more than adequate already. We cannot see why felling 90% of the trees per acre will improve the health of the forest.
- The last detailed assessment of the forest was made in 1999, by Hort Science. Though the DEIR claims that two arborists hired subsequently reported a deterioration in conditions, they haven't actually documented anything. Now, 13 years later, the DEIR still uses Hort's estimate of tree density and tree numbers: 740 trees per acre, and 45,000 trees in total. This suggests that the deterioration is insignificant.
- It also "spun" Hort's report as follows: *"the general condition of the Reserve's trees is only fair to good, but the prevalent small trees throughout the forest are generally in worse condition than the large trees that dominate the forest canopy."* Here's what Hort actually wrote: *"In general, the trees that make up the canopy were in good condition. Trees in the understory had generally poor health."* Hort's report sounds like a forest in the process of self-thinning. The trees that win the race for light flourish; the others survive or die depending on their specific circumstances.

If the forest is considered as a naturalized forest, [it will be seen as healthy and self-regulating](#); it's a population of trees in various conditions. Only if it's considered a plantation – or still worse, an invasive species – does it make sense to intervene aggressively.

#### AIR QUALITY

Trees and bushes fight pollution, especially small particulate matter that is bad for human lungs. They trap these particles on their leaves until they are rained down, thus removing them from the air, and absorb noxious gases. The DEIR does not address or quantify the loss of pollution control – which is likely to run to thousands of pounds of contaminants.

#### WILDLIFE

The assessment of wildlife is based on two (presumably daytime) site visits by the consultants, and guesswork based on the habitat conditions. There was no camera trapping, extended observation, or year-round observation to allow for seasonal changes.

- **Insects.** The DEIR only speculates, and it's wrong. "Native insect within the Reserve is expected to be low because of the dominance of non-native eucalyptus." The insect fauna of the shady understory of the eucalyptus forest would include moths, flies, and beetles. (We have also observed butterflies.) Further, it's not true that native insects use only native plants; many species adapt to non-native plants quite readily. It adds "two species of eucalyptus borer may occur... heavy infestation of these species may kill eucalyptus trees." We are not clear why this section was even included, since it contains no actual information as to what species of insects actually occur (not "may" occur) in the forest.
- **Amphibians and reptiles.** They didn't see any on their two site visits. They're guessing at what might live there, based on the habitat.

- **Birds.** This section is the most descriptive, and they actually observed some birds, and actually recognizes its value to birds, both resident and migratory. It fails to describe the impact of removing 90% of the trees and understory on birdlife. The olive-sided flycatcher is a species of special concern that may nest in the forest. It's a forest species, and was heard in the East Bowl, the area of Demonstration Project #4 – which, spaced at 12-15 trees per acre, will no longer be forest once the Plan is implemented. It also needs snags – dead trees – which will be the first to go when the thinning starts.
- **Mammals.** *They only saw a squirrel, but think the forest could house opossum, deer mice, raccoons, skunks – and black-tailed deer. No, we have no deer. They also guess at what bats might use the forest.*

*On page 4.3-20, it claims the forest is not a wildlife corridor because it's surrounded by urban development. In fact, if viewed from an animal's viewpoint, it is part of a system that connects to a broader area - Glen Canyon, Twin Peaks, Laguna Honda Reservoir, and Golden Gate Park. It says "the relatively limited amount of vegetation removal... would not interfere..." We're not sure it defines the loss of 90% of the understory (which is what matters most to non-flying critters) as "relatively limited."*

*The mitigation for birds nesting is also interesting – they're going to try to work outside the nesting season, and retain a few snags for woodpeckers. If they're working between Dec 15 and August 15, they'll call in a biologist to do a nest survey and cordon off nests. But the DEIR ignores the effect of the reduced habitat for birds the following season, which certainly is not "less than significant." k.p!*

–  
*kelsey parker, mft trainee  
 psychotherapy for individuals and couples  
 415.359.5457, kelseypmft.com*

**From:** prachi rathore <prachir11@yahoo.com>  
**Sent:** Tuesday, March 19, 2013 9:24 AM  
**To:** Campus Planning - EIR  
**Subject:** Save Sutro Trees

Hello Diane,

Hereby I submit my request.

Trees and nature are life.

Its not too late to understand that we need to live in harmony with the rest of the ecology.

We are tiny part of this ecology and hence we need to be humble and respectful towards others forms of life who are rightfully part of this...forests, tress, birds, sea life and so on.

Please do whatever in your power to save these trees with keeping this essential fact in life.

Essential to life, essential to continuity and existence.

Good luck

Prachi Rathore  
San Francisco Resident.

**From:** Rony Rolnizky <ronylu@pacbell.net>  
**Sent:** Tuesday, March 19, 2013 3:17 PM  
**To:** Campus Planning - EIR  
**Cc:** lu carpenter  
**Subject:** Sutro Forest DEIR statement

Regarding Sutro Forest and the proposed Management Plan  
Dear Diane Wong:

My question: why would a public university, which is hurting for money along with other public interests, invest hundreds of thousands of dollars in destroying a beautiful and beloved urban forest?

What is the payoff?

How can a scientific entity like UCSF, that helps the world with training and employing real doctors, and real research about saving lives, be so interested in killing off a forest - in a time of climate crisis? With part of the killing being the use of horrible toxics that will runoff into our neighborhood and into the bay? Why would it ignore all the common sense conventional and scientific wisdom in this one area? It's just too suspicious.

What is the payoff?

Does UC have its eye on a big real estate project, that will be much easier if all the trees are gone in advance? More parking?

Does someone at UC have a deal with the chemical companies that will sell lots and lots of toxics designed to kill what's left after the cutting? Who is behind this plan, really? Why has UC bought into such a ridiculous scheme?

What is so valuable that a small group would sell out the rest of us? Are they sociopaths? *This forest is working*, cleaning our air and providing a beautiful respite from sights and sounds of the city. It's filled with birds that sing as you walk along, and all kinds of trees and plants – some of which are flowering right now. The "management plan" is nothing short of gross *mismanagement* of an *irreplaceable natural resource*.

Who cares so much about harming this forest that they will continue spreading the lies and myths about “native plants” that have been debunked?

What was the backroom deal made? UCSF's reputation for dealing with the public has fallen to new lows. That is sad.

What is the payoff? That is my question, and so far, the UC people have been nothing but cagey and opaque. I'm still waiting for the answer.

I vote NO on the plan to cut the trees of Sutro Forest.

Lu Carpenter  
San Francisco

**From:** Robert Romano <wonzela@att.net>  
**Sent:** Tuesday, March 19, 2013 2:14 PM  
**To:** Campus Planning - EIR  
**Subject:** Sutro Forest

Dear Ms. Wong

Ironically I received this message after just returning from a trip to a forest in Calaveras County. It happens to be a forest on our property and we were doing work on it the past three days. It is part of our plan, along with assistance from USDA foresters, to make a healthier forest by thinning and limbing densely treed areas, clearing brush to fire-retard the understory, and keeping treated areas maintained.

The plan does NOT include clear-cutting of any kind. It does NOT include wiping out ANY species. It does NOT involve the use of herbicides. Our forest is a huge biome and all the species therein are most interdependent. Taking away a major part of this living system would affect all other parts negatively.

I am disappointed that the institution I have worked for since 1989 has decided to make a major change to the Sutro Forest based on faulty and highly spun data. What exactly is the plan here? Is there new development afoot? I thought the future of UCSF Medical Center was at Mission Bay.

So, I am writing to urge you to re-study the project and to proceed with more knowledge. Any ignorance now will have far-reaching effects long after we're both gone.

Sincerely and with much angst.

Robert Romano

To: Ms. Diane Wong  
UCSF Campus Planning, Box 0286  
San Francisco, CA 94143-0286  
[EIR@planning.ucsf.edu](mailto:EIR@planning.ucsf.edu)

page 1 of 3

Response to:

Draft Environmental Impact Report for the UCSF Mount Sutro Management Project (DEIR)  
State Clearinghouse No. 2010122041

California State CEQA guidelines mandate public agencies to avoid or substantially lessen significant environmental effects of projects where feasible, and to balance those proposed effects with their benefits. Across the board the proposed Mount Sutro Management Project fails to comply with CEQA mandates, as follows:

- The project is described as a management plan, employing extensive non-native tree removal and conversion planting to native species. The necessity of such a management plan is not adequately described in the DEIR. The University has been told by its own consultants, and by native plant advocates within the University community, that the forest is not healthy and needs massive alterations.

The proposed plan is essentially a large scale native plant restoration, described as management. Independent arborists and forest management authorities have described Sutro Forest as a healthy forest, developing (evolving) into a unique 'cloud' forest. The necessity of native plant restoration at this site is supported only by devout native plant advocates, but is overwhelmingly opposed by neighbors as expressed in petitions, written statements and oral comments made at public meetings. These people are well informed and understand Nature has got it right. The proposed project is the most environmentally destructive of all the alternatives offered in the DEIR (DEIR, pg.2.7). The proposed plan offers inadequate efforts to avoid or mitigate the significant environmental effects of the massive plant life elimination and their consequences.

A proper management plan for Sutro Forest would be sensitive to the existing environment and supportive of the environment that nature is evolving on the site.

The University (and its consultants) has got the science of the forest wrong.

- The project objectives are described as: improving safety in the Reserve, enhancing the health of the Reserve, improving the esthetics of the Reserve, and increasing the usability of the Reserve.

-Safety: the major concern for safety is potential fire hazard. The university has relied on repeating misleading or incorrect information. The main qualifiers of fire safety in the forest are the amount of moisture present and tree density. The existing conditions are described as a 'cloud' forest. The tall trees draw moisture from the air and precipitate it down onto the understory below.

The DEIR shows photos (figure 2-8) of the wet soil conditions and the caption reads: "Even in the dry seasons, water from fog deposition collects in small puddles in the trails on Mount Sutro,..."

This condition does not occur in the cleared area at the summit, and is clear and persuasive evidence that the heavily treed forest is a good fire fighter; that denser forests are more resistant to fire spread than scattered trees.

The proposed plan, on the other hand, calls for trees at such very low densities that no one could describe it as a forest. At such low densities the site will dry out as currently occurs at the summit, and the proposed native shrubs and ground covers will be dry a great part of the year, resulting in much higher fire danger.

-Health of the forest. Unnecessary destruction of up to 30,000 trees from the site cannot be described as good management in the face of independent opposing professional opinions. The only necessary work for improved safety is removal of dead or seriously injured trees or trees in danger of falling onto buildings or adjacent properties.

The amount of destruction can in no way be balanced by any projected benefits.

-Esthetic improvements: The DEIR (4.1) states "The Reserve stands out in the landscape and ... provides a dramatic visual contrast from the structures that surround it." (Figures 4.1-2 to 4.1-13). It is these masses of trees that people go to Sutro Forest to experience. Why would the University choose to destroy this? Claims that the forest will not look significantly different after implementation are patently false.

We believe the program will end in the complete destruction of the forest. Initially the density would be reduced from some 700 trees per acre to 12-50 trees per acre. Stumps of trees removed will be repeatedly treated for years with herbicides to prevent regrowth and prevent new growth. Eventually all the naturalized/non-native trees will die off, prevented from re-establishing themselves. The forest will be gone.

Prior to the introduction of Eucalyptus there were no 'native' trees growing on the land now occupied by Sutro Forest. It is not a site generally habitable by any other tree species.

-Usability of the site: current users of the site use it for a place of refuge. It is a quiet, secluded, introspective place. Loss of such a place will be detrimental to the emotional health of San Francisco. No new uses can be offered that would improve the current experience in the forest.

Sutro Forest is just that, a forest. It is not a native plant garden. There are numerous sites within San Francisco where the City's Recreation and Park Department is creating native plant gardens. Sutro Forest is an experiment of nature. Once planted plantation style, nature has made it something different, a 'cloud' forest.

Users of the forest go there for the experience of a forest within an urban environment. There are many opportunities to experience plant gardens and open hillsides with views in the City. Users want the experience the forest provides now, and have repeatedly said so.

The EIR discusses use of herbicides as a minor detail, but expects to use up to 9 quarts per acre (Aquamaster-understory: 1-5 qts./acre, Garlon 4-Ultra-tree stumps: 1-4 qts/acre. On a similar project in the east bay, UC was warned to expect to have to do multiple applications of herbicides for ten years.

Added to all the above, the DEIR admits to environmental damage from wind, noise, loss of habitat and animal population. Nothing proposed for mitigation balances out the amount of environmental damage that would result from this proposal. Already UCSF exceeds its required ambient noise level, and has never brought its developmental floor area below the agreed floor area cap. How are neighbors to believe any promises offered by this program?

We encourage the University to adopt the “No Project” alternative. (DEIR 6.1.1).

A “No Project” management plan with ongoing maintenance will meet the following objectives (DEIR pg.6-3):

- To remove hazardous trees near trails, roads and structures.
- To improve trailside visibility.
- To provide long term maintenance.
- To remove diseased and unhealthy trees.
- To remove vines from tree trunks.
- To maintain adequate path and trail side clearance.
- To maintain the university’s current policy to not use herbicides on the site.

Such a plan will be in harmony with the forest, would have little or no environmental impact, would satisfy the overwhelming majority of neighbors who want the forest preserved, and would be significantly less expensive than any other alternative.

At all the community meetings the cost of this project was asked. Taxpayers were of the mind that since this is public money, they should know. The response was always that it was too early to make estimates and none were available. However, the 1999 draft plan investigated various management options; the plan titled ‘Restoration with native shrub & tree species’ which most closely resembles the current plan was estimated at \$13,312,600 for the initial year and \$119,000 for subsequent years. The plan titled ‘Maintenance of existing forest’ was estimated at \$299,600 for the initial year and \$93,800 for subsequent years.

Lastly: the singular environmental issue now facing all on the planet is Global Climate Change. The science is convincing and the warnings are dire. We cannot ignore this disaster already making its presence known. Removal of up to 30,000 (or any number) trees from the site is an act of arrogance or ignorance. The university cannot be a science denier and pretend that things aren’t so bad that it can’t get away with a bit of pollution. Now every tree counts.

A “No Project” management plan is the proper decision.

Thank you,

Paul & Neff Rotter  
190 Belgrave Avenue  
San Francisco, CA 94117  
[paul@belgravehouse.com](mailto:paul@belgravehouse.com)

cc: Chancellor Susan Desmond-Hellman M.D., M.P.H. [Chancellor@ucsf.edu](mailto:Chancellor@ucsf.edu)  
Senor Vice Chancellor John Plotts [John.Plotts@ucsf.edu](mailto:John.Plotts@ucsf.edu)



**From:** Zachary Runningwolf <runningwolf.zachary@yahoo.com>  
**Sent:** Tuesday, March 19, 2013 3:50 PM  
**To:** Campus Planning - EIR  
**Subject:** Do not chop down trees during Global Warming

To it may concern,

You advertize that you are higher learning institution but examples like of cutting down 30,000 trees with no replacement plan during Global Warming proves otherwise. Elementary schools have such knowledge why do you need an Indigenous Elder to tell you what time it is. You will not be able to cut down these trees as me and my tree people will prevent this with a tree-sit as you remember us in the trees ion Berkeley for 648 days which happened to be the longest Urban tree-sit in US history.

Respectfully RunningWolf

**From:** Charles J Ruppert <cjruppert@hotmail.com>  
**Sent:** Tuesday, March 19, 2013 2:44 PM  
**To:** Campus Planning - EIR  
**Subject:** UCSF Mount Sutro Management Project

Ms. Wong  
UCSF Campus Planning  
Box 0286  
San Francisco, CA 94143-0286

Dear Ms. Wong and Board of Regents of UCSF,

Please share this feedback to the UCSF Board of Regents to not proceed with the proposed management activities in the draft EIR at the UCSF Mount Sutro location. I am not in favor of the proposed activities, which includes forest-thinning and removal of understory vegetation; native plant restoration and enhancement; and conversion planting (removal of non-native trees and plants and conversion to native species). Please leave the forest and vegetation as is.

I live nearby in Midtown terrace and believe that the existing trees add significant beauty and character to the area, and this beauty can be appreciated across San Francisco. I like the existing trees and vegetation, and do not want to see native trees and plants restored to the area at the expense of the existing trees and vegetation. Additionally, the existing trees are home to native birds and other wildlife.

Given the amount of fog that the area receives as a temperate cloud forest, I do not see a strong immediate need to thin the forest as proposed in the EIR.

Please ask the UCSF Board of Regents to take into account the opinions of the community that lives around Mount Sutro to preserve the existing forest and vegetation as is.

Thanks,

Charles Ruppert  
749 Panorama Dr  
San Francisco, CA 94131

**From:** [bacharac](#)  
**To:** [Campus Planning - EIR](#)  
**Subject:** Attn Diane wong - re: EIR for Mount Sutro  
**Date:** Tuesday, March 19, 2013 3:40:43 PM

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Dear Environmental Coordinator,

I believe that many parts of this EIR - especially those referring to the eucalyptus trees, but other sections as well - are based on flawed or at best, controversial, science (see Dr. Mascaro's op ed, SF Chronicle, 22 Feb 2013). I think it essential that there be additional scientific input from reputable scientists who have differing views about how to best manage this forest. For example, there seems to be credible evidence that the 30 foot spacing may well INCREASE the fire risk, not decrease it. There also seems to be evidence that in this foggy environment the eucalyptus trees actually reduce fire hazard by trapping and dripping moisture on the ground. I am not an expert. However it is critical that the EIR take into account all scientific evidence - not just evidence from "experts" that UCSF believes will support their own case. The current EIR seems to base its opinions on an evaluation by only a certain segment (and possibly not even a majority segment) of the scientific arborist/ecologist community. Hearing only from the so called "native species" lobby does not seem to be the appropriate way to produce a viable EIR.

Sincerely,  
Stephen Bacharach  
1445 Diamond St.  
San Francisco, CA 94131

**From:** Adriel Scarborough <adrielscarborough@gmail.com>  
**Sent:** Tuesday, March 19, 2013 3:29 PM  
**To:** Campus Planning - EIR  
**Subject:** Save the trees!

Please keep the natural environment of Mt. Sutro intact. Keep the trees!  
Thank you, Adriel Scarborough

**From:** schwartz1594@sbcglobal.net  
**Sent:** Tuesday, March 19, 2013 4:44 PM  
**To:** Campus Planning - EIR  
**Subject:** comment on DEIR concerning Sutro Forest

Dear Ms. Wong,

First of all, we don't understand where the idea came from to undertake such a massive makeover of the Sutro Forest which, in spite of containing non-native trees, is home to many species of birds, mammals and insects. We have read many articles which seem vague about what the real plan is. The EIR seems to be misleading when it says the forest needs to be dramatically thinned because of fire danger. It has been shown that a cloud forest such as this would dry out if thinned and the understory removed and therefore be much more of a fire hazard. Also, we almost never get the hot dry northeast winds referred to in the report, but if we did all the more reason to keep the forest as it is. There was nothing written about pollution and how the forest helps with that. UCSF needs to get a second opinion about what to do to care for it's land which is a treasure to this City. Please advise them to do so. We are strongly opposed to cutting so many trees, releasing so much carbon, displacing wildlife, birds, butterflies and insects.

Respectfully,  
Kurt and Deanna Schwartz  
132 Gonzalez Dr.  
SF 94132

From: [Avrum Shepard](#)  
To: [Campus Planning - EIR](#)  
Subject: Mt Sutro Plans  
Date: Tuesday, March 19, 2013 11:39:02 AM

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I'm writing to oppose your plan to clear cut the forest on Mt Sutro, to spray herbicides, and to plant so called native plants.

Cutting down 60% of a forest that has taken over 100 years to grow is irresponsible. Nothing you can plant there will replace the health benefits we currently have. That loss will be felt in reduced health and vitality to the citizens of our city. I hope that one of the worlds premier scientific institutions would not do something to reduce the health of one of our country's premier cities.

Use of herbicides to keep natural growth from occurring will spoil ground water, pollute sewage more than it is already, and negatively impact your neighbors. Loss of those trees will destabilize the mountain and cause great damage to your neighbor's property. Blowing sand might be nice in a desert or a beach, but is certainly devastating in a city. Look at the problems the city has trying to manage the blowing sand on the Great Highway.

If you can find the huge sums of money to follow such a misguided effort, you can instead find the money to finance students education. Our country badly needs doctors and researchers and the more students you can educate the greater contribution you'll make to world health and vitality.

Avrum Shepard  
1037 Portola Drive  
San Francisco, CA 94127  
(415)661-9255

**From:** B Line Marketing- Brooke Spilberg <brooke@blinemarketing.com>  
**Sent:** Tuesday, March 19, 2013 4:16 PM  
**To:** Campus Planning - EIR  
**Subject:** Fwd: FW: Save my backyard, my clean air, our playground, the green envy of the city-- the Sutro Forest!

Please don't use my email address or last name, but feel free to post below.

Please save my backyard and our SF retreat! My family and dog love those forests and feel they provide some great shelter from the wind and the root system ensures that the rocks and mud doesn't keep our homes from sliding. I'm very concerned about the drastic reduction in trees and the toxic pesticides you're planning on spraying throughout the area. Don't spend money on this poison, but consider spending it on planting Sequoias, pines and Cypress trees instead. Once those grow then consider cutting back on some of the Eucalypti trees. But by all means, do NOT clear cut the Sutro Forest! There are other places to build or grow. Why would a public university want to get rid of one of its biggest assets? Promote the school and area by sharing more about the neighboring trails and hikes in the forest instead.

#### Here are some concerning facts:

The DEIR is very aggressive and doesn't consider the cumulative actions of cutting down thousands of trees, when SF Recreation and Parks Dept is also felling thousands of trees, both as part of the Native Areas Program and tree-removal for other reasons, as is the Golden Gate National Recreation Area. This will result in very significant impacts that are not considered.

The fact is, the Sutro forest is young and in the prime of its life. Eighty-two percent of the forest is blue gum eucalyptus. Blue gums live in Australia from 200 to 500 years. (1) They live toward the longer end of that range in milder climates such as the San Francisco Bay Area. The blue gum eucalypts were planted on Mount Sutro in the 1880s. It is still a young forest.

The DEIR contradicts itself. Study plots used by the Draft Environmental Impact Report (DEIR) to calculate how much carbon is stored in the trees found that 77% of the trunks of the trees are 5 inches in diameter at breast height or less (if the study plots are representative of the entire forest, which is questionable). It also says that this species of eucalyptus grows very fast and that its trunk is 9 inches in diameter after only three years of growth. In other words, the DEIR claims that the trees are old and no longer growing, yet it says that most of the trees are very small and it intends to destroy the small trees, not the big ones. This is just one of many contradictions that we find in the DEIR.

In 2010, UCSF applied for another fire hazard mitigation grant from the California Fire Safe Council. The Council has funded 150 such grants in California, but they denied UCSF's application. That suggests that the California Fire Safe Council shares FEMA's opinion.

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

Thanks in advance for your help!

Neighbor of the Sutro Forest--  
Brooke

From: [Sally Stephens](#)  
To: [Campus Planning - EIR](#)  
Subject: Public comment on Mt Sutro DEIR  
Date: Tuesday, March 19, 2013 3:23:45 PM

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March 19, 2013

Diane Wong  
UCSF Environmental Coordinator

Dear Ms. Wong,

I am writing to add my voice to those who oppose UCSF's plan to significantly alter the existing ecosystem on Mount Sutro, by cutting down tens of thousands of the existing eucalyptus, destroying the existing understory, and covering much of the mountain with native plant gardens. As a UC alumna (PhD in astronomy and astrophysics from UC Santa Cruz), I am appalled that any part of the UC system would consider this ill-advised plan. My time at UCSC taught me the importance, indeed the absolute necessity, of not allowing a personal preference or bias to color your scientific findings. Sadly, the Mount Sutro DEIR could be the poster child for a badly done scientific analysis, the results of which are significantly colored by the writer's (and the institution's) personal preference or bias against eucalyptus trees and in favor of native plants.

The DEIR inadequately addresses the issues of carbon sequestration by the existing eucalyptus trees and inadequately considers the negative impact on air quality from the loss of all those trees. The DEIR incorrectly overstates the fire danger of the existing eucalyptus forest, and incorrectly understates the fire danger of UCSF's plan -- a drier forest floor because of less fog drip, dead trees cut down and left in place to dry out, increased wind speeds along the forest floor because there are few trees left to block the wind, more dry grasslands to ignite and spread a fire. Mistakes are inevitable in a document of this size, but when all the inadequate analyses and incorrect assessments lean in one direction -- to justify the removal of tens of thousands of healthy eucalyptus trees -- and only in one direction, then it is not just sloppy work. It is outright bias. And that kind of bias has no place in a DEIR.

The DEIR must be redone to remove the anti-eucalyptus, pro-native-plant bias. In particular, the DEIR must adequately address the questions raised by FEMA when it asked for clarifications to the UCSF grant application to do the same thing as this project (before UCSF withdrew the application): 1) how the fire hazard would be reduced by the planned project given that the project would reduce moisture on the forest floor by eliminating the tall trees that condense the fog (fog drip), resulting in a drier forest floor and an increased fire ignition risk; and 2) how the fire hazard would be reduced by the planned project given that eliminating the windbreak that the tall trees provide has the potential to enable a wind-driven fire to sweep through the remaining forest. These issues must be specifically addressed -- along with scientific evidence provided to support UCSF's position -- in the DEIR.

San Francisco has the second most sparse tree canopy of large cities in the United States (only Jersey City, New Jersey has fewer trees). We cannot afford to cut down tens of thousands of otherwise healthy trees on Mount Sutro, especially when combined with the plans by the Presidio, the GGNRA, and SF Recreation and Park Department's Natural Areas Program to cut down tens of thousands of healthy trees simply because they are not native. The cumulative impact of all these programs is not adequately addressed in the DEIR and should be.

If the DEIR is not completely redone, then the only thing for UCSF to do, is to accept the "No Project" Alternative, and to take the money you would have spent on the tree removals, and use it instead to manage the existing forest, e.g., remove dead trees, remove vines that interfere with tree health, etc. As a UC alumna, I am embarrassed at the quality of this DEIR. It cannot be used to justify the removal of tens of thousands of healthy trees. Do not let this project move forward.

Sally Stephens  
127 Quintara St



San Francisco, CA 94116  
stephensfw@mindspring.com

**From:** james summers <att6@hotmail.com>  
**Sent:** Tuesday, March 19, 2013 2:12 PM  
**To:** Campus Planning - EIR  
**Subject:** Mount Sutro Open Space Reserve - Please Leave the Sutro Cloud Forest alone

Dear Ms. Wong:

I have read the DEIR for the proposed project at Mount Sutro and would like to have the following comments included for consideration:

There appear to be no evidence-based reasons for the removal of so many trees in Mount Sutro. The DEIR contains errors of fact and misleading statements. Some examples are:

1. The before and after pictures are examples from elsewhere with no trees removed. Only underbrush. This needs correcting for the EIR.
2. The statement that the canopy is “sparse and unhealthy” is inaccurate and shows ignorance of the characteristics of this type of blue gum forest. I grew up in Australia and can confirm that this is what a healthy young blue gum forest looks like. Please correct this for the EIR.
3. The fire hazard described in the DEIR is exaggerated and not supported by fact. Experts have already written to you supporting this statement. Please amend the EIR to more accurately summarize the role of blue gums in the Oakland fire and fire potential in general. It is well-documented that thinning a forest can increase the fire potential. Please have the EIR reflect this knowledge.
4. The EIR should more accurately convey the impact of such thinning on the variety of wild-life that depend on the forest in its current state. It is a well-known fact, cited by expert birders such as Dr. Todd Newberry ( page 51 “The Ardent Birder” 2005) that native birds love non-native trees such as found at the UCSC Arboretum. This would also apply to Mount Sutro.

Thank in advance for any way that you can help prevent this proposal.

James Summers

1206 Fell St.

SFCA 94117

**From:** [Carol Verburg](#)  
**To:** [Campus Planning - EIR](#)  
**Subject:** Don't winnow Sutro Forest!  
**Date:** Tuesday, March 19, 2013 10:09:33 AM

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Dear Diane Wong:

You already know why the proposed plan to thin Sutro Forest is flawed and dangerous.

On the tenth anniversary of the U.S. invasion of Iraq, which was based on a similarly ambitious but misconceived plan, I want to reiterate my strong opposition to this new aggressive, misguided attempt to shape facts to fit an agenda, which also promises to have some dire unintended consequences.

Sincerely,

Carol Verburg  
94133

**From:** S Wheeler <swheeler4hs@hotmail.com>  
**Sent:** Tuesday, March 19, 2013 3:48 PM  
**To:** Campus Planning - EIR  
**Subject:** Opposition to UCSF's DEIR re: Mt Sutro

Like many other concerned San Franciscans, I am writing to express my very strongest opposition to UCSF's plans to thin Sutro Forest and remove its understory.

As detailed in the link below, in support of my opposition I refer to the Save Mount Sutro Forest response to UCSF's DEIR which cites significant flaws in the draft report:

<http://sutroforest.com/2013/03/15/flaws-in-ucsfs-sutro-deir-public-comments-due-19-march-2013/>

Having worked at UCSF in the 10 Kirkham building for many years, I observed first-hand the beauty of Sutro Forest, and marveled at the singular opportunity to have it as the setting for my work life. Fog frequently enveloped the forest providing essential moisture to the trees and other foliage. Birds of all sizes and species sang and swooped in and out of the trees and past my office windows. For the City, and for the University, Sutro Forest is truly a unique and irreplaceable ecosystem.

As with all the City's trees, which seem unfortunately to be considered expendable in the face of rampant development, the Sutro Forest provides an incredibly valuable service in sequestering carbon, and returning needed elements to the air and soil. Trees ARE the lungs of the planet.

In addition, the Forest is helping to hold Mount Sutro's topsoil layers in place. During the El Nino years of the mid-nineties, I saw the untreed, unprotected edge of the hillside slide into and block off the Kirkham parking area. Removing the Mount Sutro trees will undoubtedly raise the risk of instability in the soil, whether due to rain or to dryness. What happens to the people who live and work below Mount Sutro when the protective moisture captured by the Forest is eliminated? More slides, more blowing dust and high fire danger.

Furthermore, I cannot believe that an institution dedicated to ensuring health and well-being is willing to allow the application of Roundup or Garlon to prevent regrowth of trees that are removed. What happens when the rain carries these poisons down the hillside into the City's sewers and ultimately into the Ocean? Who can guarantee that these deadly chemicals are not going to appear in the City's water supply? What happens when it is dry and the residues of these pesticides are lofted into the air along with the drying soil? Who can guarantee the air or water quality for UCSF's patients, employees or neighbors then?

For all these reasons, as well as for others too numerous to mention in a brief communication, I am completely opposed to this DEIR and to UCSF's plan to decimate the Mount Sutro Forest.

Sincerely,

Sharon Wheeler  
San Francisco, CA 94123

**From:** Eileen Whelpley <eileen.whelpley@gmail.com>  
**Sent:** Tuesday, March 19, 2013 3:01 PM  
**To:** Campus Planning - EIR  
**Subject:** Re: Comments - Sutro Forest Draft EIR

I am resending with a typo corrected (I wrote my comments on a tiny mobile device.) My apologies if there are more typos.

Best, Eileen

On Tuesday, March 19, 2013, Eileen Whelpley wrote:

**To: Diane Wong**

UCSF Campus Planning

re: Sutro Forest Draft EIR - Comments.

Dear Ms. Wong,

I am a resident at 156 Woodland Avenue, which borders the city property adjacent to Sutro Forest.

I have met with Sutro Stewards, I have read the main points of the Environmental Report, as well as the previous report available on the website.

**CLARIFICATION ON THE EIR IS NEEDED:**

-The report is difficult to understand. This sentiment was shared by a friend in SF who works as a global environmental consultant who read the report and was confused by it.

-NO INDEX: The report does not have an index.

-NO DEFINITIONS: The report is lacking definitions of important terms used, such as "tree."

-NO LINK TO PREVIOUS SUTRO FOREST DOCUMENTS: The cover letter of the EIR should link to the most current Sutro Forest project report.

**WHERE I AGREE with the report: the big picture values:**

I value UCSF's collaboration with Sutro Stewards to create a long term management plan for the forest, with an eye towards fire safety, plant diversity, and enjoyment of the forest.

Aesthetically, I love the look of the forest as-is, but recognize addressing fire safety is important, and slowly bringing back diversity is important for the longevity of the forest.

**WHERE I DISAGREE: some of the the nitty gritty details:**

1. **PRIVACY** I value privacy a little more than public access. A secluded look vs. creating "views" as the plan calls for. I am "for" keeping the blackberry bushes, as these prickly bushes by their discomfort, discourages homeless encampments, and prevents others who want to exploring the forest off the trails.
2. **PACE AND SCALE OF PROJECT** This is a large, complex project, general internet research into any one area (such as use of herbicides,) soon leads one to the words "controversial" and "highly disputed." I value reducing the risk of unexpected environmental changes by doing extremely SLOW WORK covering ia SIGNIFICANTLY SMALLER area. To start, I suggest to do one (1) acre instead of the proposed 7 acres as a trial area. Other benefits include a faster public approval, and a more financially manageable project. The most critical, obvious fire hazards, such as those areas with piles of debris, could be hand removed and mulched or removed at a far lower cost than removing a tree.
3. **FIRE HAZARD LEVEL ASSESSMENT:** suggest bringing in a nationally recognized independent party to do a new fire hazard assessment, which includes fire hazard level in comparison to other urban

forest areas, broken down in each area of the forest - before starting any work. The FEMA response to UCSF request for funding (public record) underscores the confusion about UCSF's current assessment.

I have observed that UCSF property adjacent to city property, on the east side, is generally wet.

4. QUIET FOREST VS. NONSTOP MACHINERY NOISE: I value quiet in the forest, so as to not disrupt wildlife mating schedules or humans working at home during the day like myself.

5. ADJACENT CITY PROPERTY: I desire to have no work done on adjacent property at this time.

6. IVY ON TREES ASSESSMENT: The report assumes ivy is parasitic to a tree while other reputable institutions in the US and abroad consider that ivy to be symbiotic with a tree, providing support to the tree, and is only a detriment to it when it's up in the higher reaches of the canopy. Ivy on trees provides food for birds. According to the plan, after the ivy is killed at the base, the ivy on tree falls off within a year. My personal observation of dead ivy branches in place on the eucalyptus for 5 years, and personal research reveals dead ivy branches can cling to large trees from 5-10 years. During this period - this would create a significantly greater fire hazard - and a visual eyesore for this time period, a brown, dead-looking forest. - That look, may adversely affect property values if one were trying to sell one's house during those interim years.

Thank you for the opportunity to comment on the draft EIR.

All my best, Eileen Whelpley  
415 317 0377

**From:** [mwilson1517@earthlink.net](mailto:mwilson1517@earthlink.net)  
**To:** [Campus Planning - EIR](#)  
**Subject:** Public comment against tree cutting  
**Date:** Tuesday, March 19, 2013 4:55:01 PM

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Please do not cut the forest. I am SF resident of over 15 years. My home is near the forest. Please stop this plan.

Merida Wilson  
1737 12 th Ave  
Sf CA 94122

Sent from my iPhone