

## **SECTION 2. MASTER RESPONSES BY THEME**

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The following presents Master Responses by major theme for all public comments received on the Public Draft of the Natural Areas Management Plan.

### **DOGS**

It is hard to imagine a more controversial topic within the City of San Francisco than that of dogs, from ownership, to access, to play areas. Of the almost 120 acres of designated Dog Play Areas (DPAs) within the jurisdiction of SFRPD, approximately 95 acres or 80 percent of the area available are adjacent to or within Natural Areas (Table 5-1 in Final Draft). The Bernal Hill and McLaren Park DPAs alone account for approximately 80 acres or two-thirds of the available off-leash area located on SFRPD land.

A total of 499 comments were directly attributed to the dog theme. While they numbered fewer than the trails topic, many of the trails comments actually relate to where people want to be able to walk their dogs, creating substantial overlap between these themes. Overall, the major themes of the dog comments relate to the safety and comfort of Natural Areas visitors, access, wildlife disturbance, dog waste, and dog-generated erosion.

For purposes of this document, dog-related comments have been separated into two themes: on-leash (i. e., more restrictions on dog use desired) and off-leash (fewer restrictions on dog use desired) themes. Many on-leash comments request increases in enforcement of existing regulations, reductions in off-leash areas, or a complete ban on dogs within a Natural Area or all Natural Areas. The off-leash comments generally indicate that Natural Areas should remain unchanged (i.e., no reduction in off-leash areas), how dogs increase the safety of a Natural Area, and disagreement with the assertion that dogs cause erosion or disturb wildlife.

Approximately half of all the comments related to dogs were associated with Bernal Hill. Due to the large volume of comments, responses to comments related to dog recreation at Bernal Hill are presented in a separate section at the end of the dog-related comments.

### **MR-1. DOGS ON-LEASH (MORE RESTRICTIONS)**

#### **Issues**

As indicated above, the main issues expressed under the theme of on-leash dogs have to do with safety of Natural Area visitors, minimization of wildlife disturbance, and prevention of erosion. Only 131 comments expressed the need for more restrictions and were classified as being in the theme on-leash dogs. Comments that supported the Public Draft's treatment of off-leash dogs mostly were included in the project merits category.

The bulk of the comments in the on-leash category indicated a desire to either completely eliminate dogs from Natural Areas or to increase enforcement. In many comments it was stated that existing regulations were routinely ignored and dogs ran off-leash throughout the Natural Areas. Some people expressed a discomfort when faced with an off-leash dog.

**Reply:**

Some reductions in dog access and off-leash dog use are proposed in the Final Draft (see Section 5). These changes are proposed in areas with sensitive habitats, erosion-prone areas, and some MA-1 areas containing sensitive plant species. The Final Draft recommends an approximately 15 percent reduction in off-leash recreational acreage in Natural Areas (from 95 acres to 81 acres). At Bernal Hill and McLaren Park, DPA acreage would be reduced (by 29 percent and 14 percent respectively) to protect important native plant habitat, erosion-prone areas, and wildlife habitat areas. In addition, the Final Draft proposes that additional sensitive habitat areas be monitored for impacts. These include the oak woodlands at Buena Vista Park and Golden Gate Park, sensitive dune habitat at Lake Merced, and small MA-1 areas at McLaren Park. Also, access by people and dogs would be restricted in small areas at Pine Lake and McLaren Park and a larger area at Sharp Park.

The intent of the Dog Policy was to plan dog use in parks such that dog owners would have areas to run dogs off-leash and other park users would also have areas where they would not encounter off-leash dogs. Currently, dogs are only allowed off-leash in designated DPAs. Dogs are allowed in most other City park lands not designated as DPAs, providing they remain on-leash. According to the Dog Policy, no-dog areas include athletic fields, children's play areas, and sensitive habitat areas. Sensitive habitat areas were defined in the Dog Policy (Section 2.0) and described in Section 5 of the Final Draft. According to the Dog Policy, Sensitive Habitat Areas include:

- sensitive wildlife areas such as breeding habitat for birds;
- sensitive remnant native plant communities such as wetlands;
- sensitive plant populations such as locally rare wildflower species;
- high erosion prone areas; and
- active restoration areas (temporary exclusion only).

Existing designated DPAs within and adjacent to the Natural Areas were evaluated according to the Dog Policy's sensitive habitat areas criteria. The two existing DPAs that are recommended for modification to protect these sensitive habitat areas are at McLaren Park and Bernal Hill. Additionally, at Lake Merced the independent review conducted by scientists recommended relocating the Lake Merced DPA (Huntsinger and Bartolome 2005).

The leash law has not been enforced on SFRPD property for many years. The Recreation and Park Commission is reviewing a draft enforcement policy and SFRPD intends to implement enforcement as outlined in the Dog Policy and in accordance with the Commission's actions. In

general, however, if people comply with existing regulations, Natural Areas visitors should not experience off-leash dogs in most Natural Areas. On-leash dogs, which generally remain on-trail as well, will have a minimal effect on resident wildlife, will not create erosion problems, and should not affect the recreational experience of those who do not own dogs.

## **MR-2. DOGS OFF-LEASH (FEWER RESTRICTIONS)**

### **Issues**

Of the 368 comments classified under the theme of dogs off-leash (commentors wanting fewer restrictions to off-leash dog recreation), the proposed reduction in the off-leash DPA at Bernal Hill accounted for 201 of those (see Bernal Hill section below). Most of the off-leash comments related to the need for dogs to run without restrictions to burn off excess energy. For many people, it is through this activity that they experience the Natural Areas. There appeared to be a general misunderstanding in the comments about the proposed changes in dog-related regulations for the Natural Areas. Many people were under the impression that the Natural Areas would be fenced off completely, preventing them and their pet from entering the Natural Areas. Additionally, comments indicated that people did not agree with the classification of an area, typically at Bernal Hill, as sensitive habitat. Such actions were often characterized as a “land grab” that should be subject to review by the Dog Advisory Committee and the Recreation and Park Commission. There were substantial numbers of comments about how dogs do not disturb wildlife or that wildlife was “doing fine” regardless of what the dogs were doing. Still other comments disagreed with the assertion that dogs create erosion problems.

### **Reply:**

**Regional Perspective.** Regionally, San Francisco provides larger and more dispersed off-leash areas than many other Bay Area communities. For example, the Trust for Public Land cites Cesar Chavez Park in Berkeley, a City park, as the largest DPA in the East Bay, at 17 acres<sup>1</sup>. Point Isabel, a popular spot for off-leash dog play in Richmond operated by the East Bay Regional Park District, is 21 acres. Seattle has only six approved DPAs and two pilot sites in a park system yet has twice the overall acreage and facilities of SFRPD.

Currently, there are 118 acres of SFRPD land dedicated to off-leash dog play.<sup>2</sup> Approximately 95 acres (81 percent) of the DPA acreage on SFRPD land is within or adjacent to Natural Areas (see Table 5-1). With implementation of the Final Draft’s recommendations, 85 percent of the DPA acreage within or adjacent to Natural Areas would remain. Two existing DPAs are proposed for off-leash acreage reduction: McLaren Park and Bernal Hill. The acreage provided in the remaining eight DPAs would not be changed with implementation of the Final Draft. Half of the DPA acreage in Natural Areas is found in McLaren Park. Even with the 8-acre reduction in off-leash area, McLaren Park will remain one of the largest, if not the largest, DPAs in the Bay Area

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<sup>1</sup> Harnik, Peter and Cerise Bridges, Trust for Public Land, “Dogs unleashed on Parks”

<sup>2</sup> All DPA acreages described in this plan are estimates.

(at approximately 51 acres). The largest percent reduction in a single DPA is at Bernal Hill. Even with the reduction in acreage recommended in the Final Draft, Bernal Hill will remain the second largest DPA in San Francisco, after McLaren Park, and amongst the largest in the Bay Area. Reductions will affect mainly steep slopes and only the most significant and threatened portions of the Natural Areas.

**San Francisco Dog Policy.** The Dog Policy was developed by SFRPD with input from community stakeholder groups, the San Francisco Municipal Codes, and the 1998 Dog Task Force. One of the outcomes of this effort was a citywide Dog Policy adopted by the Recreation and Park Commission in 2002. Among other things, this policy created a process for establishing new DPAs and guidelines for protection of Sensitive Habitat Areas. Sensitive Habitat Areas are defined in Section 2.0 of the Dog Policy and referenced in Section 5 of the Public Draft and Final Draft. The Dog Policy describes the potential acreage of sensitive habitat that may require limitations on off-leash use. The Dog Policy states that of the “approximately 500 acres of Natural Areas available for recreational use, approximately 20 percent would be considered Sensitive Habitat Areas. The remainder of the Natural Areas (approximately 400 acres) would be potentially available for off-leash, on-leash or on-trail DPAs.” There were many comments indicating that the 100-acre maximum sensitive habitat area described in the Public Draft was not part of the Dog Policy. The text of the Final Draft has been revised to reflect the actual adopted language of the Dog Policy.

The Dog Policy also established a process for creating new DPAs. As new DPAs are proposed, the Natural Areas Program should work with the Dog Advisory Committee and/or the Recreation and Park Commission in reviewing proposed DPAs for compatibility with the Final Draft and the Natural Areas mission. As described in the Final Draft, new DPAs should not be located in MA-1 or MA-2 areas though given appropriate site conditions may be appropriately sited in MA-3 areas. If new DPAs are located next to MA-1 or MA-2 areas, fencing may be required. Fencing, if required, will only be very low, rustic fencing that will not detract from the natural beauty it is designed to protect.

**DPAs Not Evaluated in Public Draft.** Four DPAs were not evaluated in the June 2005 Public Draft. These include Golden Gate Park Northeast and Golden Gate Park Southeast in the Oak Woodlands Natural Areas of Golden Gate Park, and the Geneva Avenue and Crocker Amazon DPAs within and adjacent to McLaren Park. Review of these areas indicates that the Golden Gate Park Northeast DPA should be monitored to ensure that use does not adversely impact the oak woodlands. The Golden Gate Park Southeast DPA is spatially separated from the oak woodlands and requires no changes or actions to protect the natural resources. The Geneva Avenue site in McLaren Park needs signs that delineate the DPA boundaries, but once this is accomplished there are no expected issues with use of this site. Finally, the Crocker Amazon DPA is spatially separated from the Natural Area and requires no additional actions. The Final Draft has been revised to reflect these changes.

**Access.** People and their dogs will continue to have access to the Natural Areas for on-leash and on-trail use. The Natural Areas will not be fenced off and access will not be prohibited. Temporary fencing will likely be required to protect restoration sites. Permanent fencing is recommended in relatively few locations and only as a last resort if signage and temporary barriers are ineffective at controlling access. As stated above, only low rustic fencing that will not detract from the natural beauty of the setting would be installed (see Appendix H of the Final Draft).

**Safety.** Safety was raised in two ways in relation to the theme of dogs. First, there are those people who are uncomfortable when confronted by an off-leash dog. The purpose of the Dog Policy is to plan land use in parks such that park users can choose to encounter or avoid off-leash dogs (see MR-1 above). Secondly, several comments suggest that dog use in the Natural Areas can reduce the undesirable use of the Natural Areas (e. g., crime, drug use). It is likely that more regular recreational use of parks, such as that associated with dog walking, may reduce undesirable activities, because dog walkers have the opportunity to observe and report to law enforcement officials activities that negatively impact Natural Areas and visitors. However, the positive effect that public use may have on the parks is likely to be similar whether or not dogs are on-leash or off-leash.

**Wildlife Disturbance.** Many of the dog-related comments indicate that dogs do not disturb wildlife. While this may be true of some dogs, there are others that certainly do disturb wildlife. The scientific review of the Public Draft indicated that while one study has found that dog impacts may be overstated, there is still ample evidence in other studies that dogs do in fact kill and injure small mammals, reptiles and amphibians, and that the simple act of running through bird nesting habitat can disturb birds and reduce reproductive success (Huntsinger and Bartolome 2005). The survey work done in preparation of the Public Draft suggests that reptile and amphibian numbers are low in Natural Areas. Anecdotal evidence from area birdwatchers indicates that populations of ground-nesting birds are declining. It is possible that in areas with relatively small initial wildlife populations such as the Natural Areas, increased disturbance and resulting reductions in reproductive success could be contributing to the decline of many ground-nesting birds, reptiles, and amphibians. Certainly, off-leash dogs are not solely to blame for this decline; factors such as habitat size and increased human use of the Natural Areas have contributed as well. However, enough evidence exists to suggest that dogs that are allowed to roam off-leash can harm or disturb wildlife (Huntsinger and Bartolome 2005). Also see MR-3, Wildlife below for a discussion of state and federally protected species.

**Erosion.** Overuse of an area, whether by dogs or humans, can lead to trampling of vegetation, which exposes soil, thereby increasing erosion. While dogs may have a lower impact per foot than humans, overuse will still result in removal of vegetation and exposure of soils. Examples of this can be seen at the eastern edge of Pine Lake where routine access to the water has resulted in a muddy area of ground immediately adjacent to the lake. Erosion issues can be exacerbated, especially on slopes, by dog running and chasing activities associated with off-leash recreation. Many of the Natural Areas have relatively unstable erosion-prone soils. In areas of focused use,

excessive trampling promotes erosion. The Final Draft recommends installation of signage requesting visitors to keep pets off unstable soils and slopes. If signage fails to prevent damage to the area, site-specific low fencing may be required to protect unstable areas. In general, however, if dogs remain on-leash and on-trail as required within most of the Natural Areas, impacts related to vegetation trampling and erosion should be minimized.

**Enforcement.** Although relatively few off-leash themed comments relate directly to enforcement, many of them do indicate that most people follow the rules, leash their pets when required, and clean up after them. There are numerous comments attributing impacts to professional dog walkers and requesting licensing of these people. See the discussion of enforcement in MR-1.

**Bernal Hill.** The estimate of acreage to be converted from off-leash to on-leash at Bernal Hill has been revised in the Final Draft. Currently this DPA is 21 acres and includes all the land above and including Bernal Heights Boulevard. The Public Draft recommended conversion of approximately 8 acres above the road to on-leash recreation. Some comments supported this idea. A segment of the population does not enjoy interacting with off-leash pets, regardless of how well controlled or behaved they are. There were many more comments in opposition to this proposal. Commentors noted that people and their pets use Bernal Hill daily, sometimes making two or three visits. This group of people does not want to alter their use patterns of this Natural Area. A significant number of people were in favor of 100 percent of Bernal Hill being off-leash.

The Final Draft retains the reduction in off-leash area at Bernal Hill, but the estimate to be converted to on-leash has been refined. The revised Bernal Hill plan (see Section 6.21) proposes a 6-acre on-leash and on-trail area that generally conforms to the areas delineated as MA-1a and MA-1b on the north side of Bernal Hill. The boundary of the proposed on-leash area has been adjusted to conform to existing trails and allow park users with dogs to have off-leash access through some areas designated as MA-1. The on-leash trail area was modified so that a complete circuit of the hill could be made without having to put one's dog on a leash.

The Final Draft proposes a reduction in off-leash acreage by 6 acres. Of these 6 acres, approximately 2.5 acres are largely inaccessible with slopes between 45 and 90 degrees. There are 4.5 acres below Bernal Heights Boulevard that could be converted to an off-leash area to help offset this reduction. Although portions of this area below the road are also steep, some areas could be developed with trails to accommodate public use and access. To facilitate compliance with this recommendation and other DPA boundaries throughout the City, SFRPD will post signs at Bernal Hill and maps of the official DPAs will be available on the SFRPD website. Even with the reduction, the Bernal Hill DPA will remain one of the largest off-leash DPAs in the entire San Francisco Bay Area (see MR-2).

The northern section of Bernal Hill that supports the most sensitive species and habitats and has significant erosion-prone areas has been proposed to be converted to an on-leash area. Sensitive wildlife and plant habitats and high erosion risk areas are identified in the Dog Policy as

Sensitive Habitat Areas that may be off-limits to dogs (see MR-1). The smaller MA-1 areas on Bernal Hill are less sensitive and quite small. These areas will remain as part of the off-leash area. Many comments related to Bernal Hill suggested that dogs were not responsible for erosion, digging, or disturbance of wildlife (see Wildlife Disturbance above). The scientific review conducted in preparation of the Public Draft indicated that disturbance from off-leash dogs, while not well studied, had been shown to reduce nesting success of ground nesting birds (Huntsinger and Bartolome 2005).

### **MR-3. WILDLIFE ISSUES**

The comments categorized into the theme of wildlife pertained to several Natural Areas and included many topics. Among the more common themes were the effects of tree removal and other management recommendations on wildlife, especially birds; issues related to the western pond turtle (*Clemmys marmorata*) at Pine Lake; and predator (non-native animal) control. Also, there were comments suggesting that wildlife was doing “just fine” under the existing conditions and that no change to existing land uses or vegetation was required.

A large number of comments relating to the western pond turtle at Pine Lake indicated the belief that the California Department of Fish and Game (CDFG) would require SFRPD to remove trees and create suitable upland habitat for this sensitive species. Still others were under the impression that the Public Draft recommended augmenting the pond turtle population at Pine Lake and that such augmentation would result in restrictions on human and dog access to the park.

Some comments related to the issue of non-native predator control questioned the Public Draft’s approach of valuing native species over non-native species.

#### **Reply:**

The potential impacts to wildlife associated with the proposed management activities are discussed in the Public and Final Draft Plans. Measures to minimize impact to birds, such as tree removal and other activities, are discussed in Section 5 (GR-4) and Appendix F. Recommendations, including conducting wildlife surveys prior to vegetation removal; restricting vegetation (including tree removal) to the non-breeding season; and creating brush piles and other temporary habitat are among the measures recommended to reduce impacts of vegetation management on wildlife.

In addition there are recommendations designed to protect sensitive wildlife species by limiting access to their habitat. Access may need to be controlled in areas that support state or federally protected species such as the San Francisco garter snake (*Thamnophis sirtalis elegans*), California red-legged frog (*Rana aurora draytonii*), and the mission blue butterfly (*Icaricia icarioides missionensis*). The SFRPD has a responsibility under the State and Federal Endangered Species Acts to protect these species. It is expected that area closures would either be temporary during periods when animals are most sensitive to disturbance (nesting or breeding

season), or more permanent trail relocations to keep people and their pets out of sensitive habitats utilized by these species. Potential closure areas include the wetlands at Sharp Park (California red-legged frog and San Francisco garter snake), and grasslands supporting mission blue butterfly habitat at Twin Peaks, McLaren Park, and Bayview Hill. In all cases, through pedestrian traffic would be allowed in all these areas, but if necessary trailside fencing would be installed if other measures are not effective at controlling use in habitat areas. See also MR-1 above.

There appears to be a general misunderstanding about the potential effects that the presence of the western pond turtle would have on access and trees at Pine Lake. The presence of the turtle will not result in the removal of mature trees and will not affect recreational use of the trails around the lake. Furthermore, the Public Draft did not recommend augmenting the pond turtle population at Pine Lake.

The management recommendations for the western pond turtle at Pine Lake have been revised in order to provide greater conservation and recreational benefit. Because CDFG had determined that the habitat at Pine Lake is marginal for western pond turtle, the Final Draft has been revised to recommend relocation of the animals to the higher-quality habitat at Lake Merced if this species is found at Pine Lake.

The recommendations to control non-native species in order to protect native species and biodiversity originate in the plans and policies of the City of San Francisco and are founded on the most current scientific evidence. The Natural Areas Program is directed by the General Plan, the Sustainability Plan, the SFRPD Strategic Plan, and the Significant Natural Resource Areas Management Plan, adopted by the Commission in 1995, to protect and enhance biodiversity of Natural Areas within the City (see Section 1.4 of the Final Draft). In carrying out its mission, the Natural Areas Program is mandated to manage the Natural Areas for their natural resource values and biological diversity, including native wildlife. The Natural Areas Program, by implementing recommendations within the Final Draft, is attempting to prevent local and regional extinctions of native animal species

Modern-day species extinctions and the negative effects that introduced animals have on native animal populations and diversity has been well-documented over the last half century (Elton 1958, Fox and Fox 1986, Lowe et. al. 2000). In the San Francisco Bay Area, populations of some native wildlife species are declining and many common native animals have disappeared, in part due to the introduction of invasive species (Cohen 1997)(see also GR-10 in the Final Draft). In San Francisco, the Pacific chorus frog and several species of butterflies are among the animals that no longer occur here. Habitat loss and conversion combined with pressures from introduced species can push plants and animals to the edge of extinction.

While not all introduced species are problematic, some species, especially those well-adapted to urban environments, compete with and displace native wildlife. If these species are not controlled, further loss of wildlife will likely result. Sometimes, the only way to protect native

animals is to actively remove the invasive species. For example, the proposed monitoring and control of bullfrog populations at Sharp Park is critical for the survival of the federally threatened California red-legged frog, and may be necessary at Lake Merced to improve the condition of native western pond turtle populations.

The recommendations within the Final Draft that relate to wildlife usually entail habitat improvements. It is more cost-effective to restore suitable habitat than it is to attempt to directly manage wildlife resources. Direct management of wildlife is recommended only in situations where introduced predators can directly compete with or prey on desired native wildlife. The long-term goal of wildlife management as described in the Final Plan is to achieve some stability of local species of special concern.

#### **MR-4. TREES**

##### **Issues:**

There were over 260 comments identified as relating to trees. In general, these comments were a mix of statements demanding that the SFRPD not remove any trees, indications of the wildlife value of trees and snags, and how the trees are an established part of the character of San Francisco. Some people expressed the fear that SFRPD would remove all the trees designated for removal at the same time. Other people recognized that the Public Draft recommends the removal of invasive species of trees to protect sensitive resources or gradually create forests based on native species. Still others requested that any trees that are removed be replaced with similar-sized trees.

##### **Reply**

For purposes of the Final Draft, a “tree” is defined as having one vertical trunk and a height greater than 15 feet. This definition comes from the reference *Arboriculture: Integrated Management of Landscape Trees, Shrubs, And Vines* (Harris 2003). There were many comments that disagreed with this definition and comments suggesting that saplings and sprouts could be removed without the action being considered tree removal; however, none of the comments presented a viable alternative definition. In addition to identifying the location of trees to be removed, the Final Draft identifies specifically where seedlings and saplings of invasive tree species would be prevented from establishing.

The estimates of tree removal proposed in the Final Draft only pertain to trees within Natural Areas. There are an estimated 118,000 trees in Natural Areas. Of these, approximately 64,000 are in San Francisco and 54,000 are in Sharp Park. The many thousand of trees that occur on other park lands such as golf courses, neighborhood parks, and most of Golden Gate Park, are not considered in the Final Draft. Trees on properties owned by other jurisdictions, such as University of California, San Francisco, Laguna Honda Hospital, and the San Francisco Public Utilities Commission, similarly are not included.

After the Final Draft is implemented, over 60,000 trees (approximately 95 percent) of the trees in San Francisco Natural Areas) would remain. The Final Draft proposes a more significant tree removal plan for the upper canyon area of Sharp Park. At Sharp Park, the Final Draft proposes cutting down approximately 28 percent of the trees (15,000 of a total estimated 54,000) within the mission blue butterfly habitat, along the creek corridor, and along the edges of the forest where the trees encroach on the native habitat.

Tree removal activities in Natural Areas are expected to occur in phases over the life of the Final Draft (20 years). A total of 3,400 trees are proposed for removal within the City of San Francisco (this represents 5 percent of the trees currently in Natural Areas). These are trees that are encroaching into and converting valuable habitat remnants and threaten their persistence. On average, approximately 170 trees per year are proposed for removal. The number of trees to be removed in a given year is constrained by staffing levels, resources, and restrictions on when tree removal can occur. It is expected that under the best of conditions, no more than approximately 10 percent of the total trees to be removed would actually be cut citywide in a single year (340 trees). If capital project funds should become available, more trees could be removed in a given year. Supplemental environmental review and public process also would be associated with a capital project.

Priority for removal will be given to trees that are in poor health, diseased, or stressed from overcrowding (GR-15c). As discussed in GR-6a, because of their wildlife value, snags will be retained unless they are a hazard to public safety or harbor significant disease or harmful insect populations. Operational standards for wildlife protection are incorporated into the Final Draft in Appendix F.

Trees removed within MA-1 and MA-2 areas will be replaced in some cases with native tree species, including coast live oak (*Quercus agrifolia*), California buckeye (*Aesculus californica*), California wax myrtle (*Myrica californica*), toyon (*Heteromeles arbutifolia*), and red alder (*Alnus rubra*). Not all trees removed will be replaced with trees. One of the stated goals for many Natural Areas is to expand the coverage of grassland and scrub habitats. In order to accomplish this goal, it is necessary to both remove mature invasive trees and prevent recruitment. In other cases, native tree species will be planted after invasive species are removed. However, it is not feasible to replace a mature tree with another mature tree as some comments requested. Native trees have higher survivorship rates if young trees, seedlings, or saplings are planted. An estimated five to 10 years is required for these native tree seedlings and saplings to mature.

## **MR-5. CATS**

### **Issue:**

The discussion in the Public Draft relating to management of feral and free-roaming cats generated a substantial amount of comments. Fifty-eight comments were received that focused on cats. Most of these (33) were classified as system-wide comments and typically requested the

removal of GR-7, which addresses the issue of cats within the Natural Areas. Several commentors questioned the legitimacy of the feral cat studies referenced in the Public Draft and indicated that the text was decidedly anti-cat. In addition, many comments in this category related to the language on educational signage in GR-14. Specifically, concern was expressed that the recommendation to control animal populations maintained by artificial feeding, and the impacts of released predators on native wildlife, were specifically focused on feral and free-roaming cats.

**Reply:**

The text discussion of GR-7 has been revised to incorporate the findings of the scientific review and the impact of predators other than feral cats. The recommendation regarding feral cats has been revised to include references to other trap-neuter-release programs in the San Francisco Bay Area and a discussion of relocation of feral cats; however, the basic recommendation to implement the feral cat control policy developed for the Quail Recovery Plan did not change. This is not a “trap and kill” plan, but rather creates a system by which the SFRPD coordinates with the San Francisco Society for the Prevention of Cruelty to Animals (SF/SPCA) to relocate cats, or with another cat advocacy group if the SF/SPCA is not available. Many comments stated that the Public Draft did not mention other predators that affect wildlife populations. While unsubsidized predators such as skunks (*Mephitis mephitis*), raccoons (*Procyon lotor*) raptors, and owls can impact wildlife, their populations are not concentrated and maintained as cat colonies are. Nonetheless, the Final Draft has been revised to include other species of predators that have impacts on birds and other wildlife.

The language in the general recommendation related to education (GR-14c) has also been changed. This recommendation attempts through education to address the human feeding of “wild” animals such as raccoons and pigeons that carry diseases and impact natural systems. This section explicitly does not apply to feral cats. The reader is now referred to the recommendations in GR-7, which include all recommendations regarding feral cats, including educational material that discourages “dumping” of unwanted domestic pets into park lands and streets.

**MR-6. PLANTS**

**Issues**

A substantial number of the comments received (over 415) were related to plants. These ranged from people who questioned the value of removing non-native species in favor of native species, restoration actions, erosion, and fire protection. Many comments related to sustainability and the potential need for long-term care of the Natural Areas and restoration projects. Other comments noted that recent restoration projects have not been maintained and that these areas look weedy or unattractive. Some comments expressed concern that recreational activities would be restricted due the presence of sensitive plant species, while others questioned the designation of

locally significant plants as sensitive. Other people commented that they were having difficulty matching the figures in the Public Draft to existing ground conditions.

**Reply:**

**Native versus Invasive.** Invasive species differ from non-native species. Invasive species are known to be problematic worldwide. For example, trees from California wreak havoc in natural areas in Australia and vines from South Africa cause problems for California wildlands. Invasive species include plants or animals that are introduced by humans, either intentionally or unintentionally, to natural areas and once established spread uncontrollably and “push out” local native species. Not all non-native species are invasive. Only a handful of the thousands of plants that are brought into this country through the nursery trade are considered invasive in wildland areas. Invasive species have specific traits that allow them to expand rapidly and without control. Many of the invasive plants found within the Natural Areas have characteristics that make them challenging to control. Some of the most noxious invasive species have the ability to survive high levels of human-generated use; regenerate from cuttings, fragments, stumps, or roots; are tolerant to extreme fluctuations in water supply and soil quality; often have growth rates that vastly exceed native plants; and produce large volumes of seeds. In order to maintain or promote the ecosystems and species that make San Francisco distinct, invasive species need to be contained.

It is important to remember that one of the primary directives of the Natural Areas Program is to protect and enhance the biological diversity (biodiversity) of Natural Areas within the City. In order to promote biodiversity in San Francisco, the extinction trend of native plants and animals must be reversed. In the last 50 years, over 50 percent of the plant species in San Francisco have disappeared. Some of this loss is undoubtedly due to the loss of open space and habitat for these species. In other cases, native plant species have been crowded out by invasive weeds. The loss of native plant species is not only tragic for humans who can no longer go to local parks and see the diverse array of wildflowers in the spring, but it is disastrous for some native animals that depend on those plant species for food, reproduction, and other critical life cycle stages. If the plants on which animals rely disappear, then so do the animal species. Sometimes, the best way to protect animal species and ensure they will be around for future generations to enjoy is to control the few problematic invasive species.

**Restoration.** Restoration of natural areas is a process that usually begins with removal of invasive plant species (see GR-1 in Section 5 for a discussion of invasive plants). This phase can be relatively labor-intensive, especially when removing such tenacious species as *erharta grass (Ehrharta erecta)*, *oxalis (Oxalis pes-caprae)*, and *Himalayan blackberry (Rubus discolor)*. Native plant restoration, as described in the Public and Final Draft Plans, would occur in relatively small areas. At no time will entire hillsides be denuded and left to erode into neighboring yards (see erosion section below). Installation of native plants follows the removal of invasive species. Care of the natives is necessary through the first couple of springs to remove the invasive species that reproduce from roots or the seed bank. Many of California’s native

plants do very well given the opportunity and are more than capable of preventing erosion. Eventually, these restored areas will interconnect, creating stable, relatively maintenance-free native plant habitats. As with a garden environment, not all plants that are planted survive through the first year, but unlike a planted garden, once established in restoration areas these plant species require no artificial inputs of fertilizers, water, or pesticides. Therefore, once a Natural Area is restored, significantly less maintenance is required for the Natural Area as compared with a landscaped area. Long-term maintenance of these sites should be limited to routine inspection and removal of invasive species as necessary to preserve habitat integrity.

The scientific review of the Public Draft indicated that successful restoration of native grasslands may be exceedingly difficult (Huntsinger and Bartolome 2005). The review suggested that instead of complete restoration, the focus should shift to creation of structural diversity within the existing non-native grasslands. Enhancement of the native component, especially those plants that are hosts to or provide forage for insects, may have a more significant favorable impact on the biodiversity and be more attainable than complete restoration to native grasslands. The Final Draft has been modified to reflect this critique.

**Fencing.** There were quite a few comments arguing for and against the use of fencing. In general, the Public Draft suggested the use of temporary fencing to protect restoration sites from unintentional damage generated by Natural Area visitors or their pets. Because most restoration sites, unless they are trail-specific, will occur outside normal use areas (recreational trails), the effect that temporary fencing will have on visitors is minor. In the case of trail restoration, alternate routes will be made available as appropriate. Permanent fencing is recommended in relatively few locations and in all cases only as a last resort if signage and temporary barriers are ineffective at controlling access (see MR-2).

**Vegetation Mapping.** The vegetation communities presented in the Public and Final Draft Plans were mapped between 1998 and 2000. Because management has been occurring in Natural Areas since this time, the information on the vegetation maps may not match current conditions. In the six years since the conclusion of vegetation mapping, areas have been restored and species such as French broom (*Genista monspessulana*), pampas grass (*Cortaderia selloana*), and blue gum eucalyptus trees (*Eucalyptus globulus*) have been removed. In other cases, trees have fallen down from natural causes and new trails have developed. It was not possible to track the on-the-ground changes to vegetation communities over the seven years it has taken to produce the Final Draft Plan. Furthermore, the vegetation maps in the Final Draft represent baseline information at the beginning of the NAP. This information is important to capture and document and will be useful for measuring NAP restoration progress over time. Once the Final Draft is approved and accepted for use, the changed conditions will be recorded through the monitoring and feedback loop which is an integral part of the adaptive management approach on which the Final Draft is based.

**Sensitive Plants.** The reintroduction of sensitive plant species will not affect recreational use in Natural Areas. This is described in the Public and Final Draft. Some commentors expressed

concern that re-introduction of a sensitive plant species would restrict recreational use in some Natural Areas (see also MR-8, Sensitive Species). As stated in the Public and Final Draft Plans, reintroductions will only occur in MA-1 and MA-2 areas. Public use within these areas is supposed to be limited to trails with pets on-leash. In most cases, reintroduction of sensitive plants will occur in locations away from trails, in order to minimize the disturbance to the plants and maximize the success of the re-introduction. Because the reintroductions would occur off of approved trail routes, allowable recreational uses would not change. Most of the species discussed as potentially suitable for re-introduction are considered locally sensitive by the California Native Plant Society (CNPS), a San Francisco based plant conservation organization. These locally rare species occur in limited numbers or have small distributions, and are therefore at risk of becoming locally extinct. These locally significant plant species have no standing or protection afforded to them by federal or state endangered species legislation. Conservation of these locally significant plants is critical to biodiversity conservation in San Francisco.

**Herbicide Use.** Despite the emphasis on hand, mechanical, and alternative methods of removal, herbicides sometimes are used to control invasive weeds in Natural Areas, especially when other methods are not feasible. The Natural Areas Program has a “least toxic approach” policy to invasive plant control, which means that non-herbicide control methods are investigated or used first before chemicals are applied. The many non-herbicide methods of invasive plant control and decision-making process used by the Natural Areas Program are described in Section 4 of the Final Draft Plan. As is described in the Public and Final Drafts, the Natural Areas Program used less than 10 percent of the overall SFRPD usage in 2004. On a per-acre basis, pesticide usage in the Natural Areas is significantly less than usage rates in other park maintenance programs. Of the over 40 approved compounds used department-wide, the Natural Areas Program uses only three and most of the product used is in the least-toxic category. Please refer to Section 4 of the Final Draft for a more detailed discussion of herbicide use.

**Erosion.** Some comments raised the concern that the removal of any plant material would produce unnatural rates of erosion and that eucalyptus and iceplant (*Carpobrotus edulis*) are better at controlling erosion than native plants. Others were concerned that use of social trails increases erosion. Erosion is a natural process but can be exacerbated by activities such as large-scale plant removal and trampling. As stated above (in Restoration), management activities involving the removal of invasive species typically occur on a small scale and are partnered with revegetation. Not all plant species are good at erosion control. “The literature suggests that invasive plants common in the parks, like eucalyptus and highway ice plant are not optimal for erosion control (Huntsinger and Bartolome 2005).” Ultimately, restoration projects that increase vegetative structure and diversity will provide long-term erosion protection. This means installing native plants with differing rooting depths. The Public Draft also describes the need to close or reroute some social trails in order to reduce erosion. Temporary measures to control erosion during and immediately following the removal of invasive species, such as leaving roots in the soil and installing temporary soil protection devices, are described in Section 5 of the Final Plan. The approach to revegetation and erosion control described in the Final Draft is consistent with sound soil conservation practices.

**Fire Protection.** Several comments were related to fire control and protection. Some commentors were concerned that eucalyptus trees adjacent to private homes represented a fire danger. Others suggested that public access and brush piles located next to homes increase the risk of fire damage to adjacent property. GR-13 of the Final Draft has been revised to include the creation of fire protection zones, including the removal and thinning of hazardous vegetation and brush piles within 30 feet of homes and other structures.

## **MR-7. TRAILS**

### **Issue:**

There were over 560 comments categorized into the trails theme. However, as stated above, many of the comments categorized as the trails theme related to off-leash dogs. As expected, issues relating to access and potential limitations on access are very important to people who recreate in the Natural Areas. Many comments related to trails were based on misinformation, specifically that visitors or their dogs would not be allowed into the Natural Areas. Other trail-related comments reflect the desire to continue to have access, the apparent safety of approved and maintained trails when compared to social trails, requests for specific trails to be opened or closed, or support for trail closures overall. Many people submitted comments reflecting a desire to have more restrooms, restrooms fixed, or restrooms open for longer hours during the day

### **Reply:**

There are 17.5 miles of improved and 12.5 miles of unimproved trails within the Natural Areas which will continue to be accessible to people and their on-leash pets. In addition, 1.1 miles of new trails are recommended for development. This means that over 31 miles of designated trails will be provided in just 1-square-mile acreage of Natural Areas in San Francisco. The Final Draft does not preclude people from using Natural Areas on approved trails. It does, however, allow for the closure or re-routing of social trails. Examples of social trails include undesignated trails that short-cut trail routes or switchbacks, trails that lead into the park from neighboring residences, and trails that cross landscaped and vegetated areas to private hiding spots. Social trails are those created by people without regard to, or awareness of, the park resources, and can be incredibly destructive to natural resources. Aside from direct trampling of plants, the trails often go straight up or down a slope without concern for runoff or erosion risk. Often these routes are redundant with primary approved and maintained trails. There were comments that indicated social trails should remain simply because they were created by the people who use the park. However, if social trails are allowed to develop anywhere by users and without regard to planning, the park landscape will degrade. Excessive bare soil from crisscrossing and short-cutting will detract from the park's aesthetics, increase erosion, and create safety problems associated with erosion.

In order for resources to be protected, a well-planned trail network must be established and park users must follow those trail routes. The Final Draft retains the recommendation to close a total

of 10.3 miles of social trails within the Natural Areas. As this occurs, the park user may notice minor changes to trails as redundant, unsafe, resource-damaging social trails are closed or rerouted. The trails that are closed will be restored with the appropriate native vegetation. Social trail closures will not occur all at once and the trails with the greatest safety concerns or with the greatest impacts to sensitive resources will be prioritized. At no time, except perhaps temporarily for safety reasons, will the public be prevented from entering and enjoying the Natural Areas.

In general, the Natural Areas do not support buildings of any kind, including restrooms. Infrastructure within Natural Areas is limited to trails, benches, and informational signage. Construction, operation, and maintenance of facilities such as restrooms and trash bins are outside of the operational area of the Natural Areas Program. Comments regarding capital improvements such as restrooms have been forwarded to the SFRPD Planning Division staff.

## **MR-8. SENSITIVE SPECIES**

### **Issues:**

Sensitive species are seen by some commentors as an excuse to exclude humans from the Natural Areas. The common misconception found in many comments is that reintroductions of sensitive species would lead to reductions in access. The list of species that are considered locally sensitive in the Public Draft is substantially longer than the species list provided by the state or federal governments of species protected under the Endangered Species Act. Many comments requested that the Public Draft consider only those species protected by the Endangered Species Act as locally sensitive. Other comments requested that additional species be added to the list of sensitive plants and animals.

### **Reply:**

The list of plants and animals considered to be locally sensitive for this project includes 56 species of birds, two reptiles, one amphibian, one fish, seven invertebrates, and 73 plant species. The magnitude of this list suggests that the potential for further loss of biodiversity in San Francisco is great. Native plants and animals persist in small fragmented habitats (representing less than 3 percent of the total acreage of San Francisco) that are subject to high levels of human disturbance and ongoing pressure from introduced plants and animals.

The list of locally sensitive species remains unchanged in the Final Draft. Selection of species considered to be locally sensitive is discussed in the Final Draft (Section 3.3, Sensitive Species). Essentially, species were considered to be sensitive if they occurred in three or fewer locations in the City. At some point, a species must be locally rare before it is considered in enough danger of going extinct to warrant listing under either the State or Federal Endangered Species Acts. It is not uncommon for resource managers to use a local rarity when making management decisions. In fact, the California Environmental Quality Act (CEQA) requires that a species' actual rarity be considered when evaluating project-related impacts (CCR Section 15380). Therefore, most environmental documents prepared in compliance with CEQA include locally sensitive plants (as

identified by local CNPS Chapters) as sensitive species. If these locally significant species were not addressed during the development of the Public Draft, they would likely be included as part of the upcoming environmental review. In addition, it is far more effective from a biological point of view to start managing species before they become so rare that management is mandated by the state or federal governments. Because of this, using only the state and federally listed species could be considered short-sighted and not in alignment with city policy (i. e., Policy 2.13 of the General Plan described in Chapter 1.0 of the Final Draft).

The Final Draft discusses and recommends reintroduction of sensitive plants within some of the Natural Areas. The effects of reintroduction on Natural Area users are discussed in MR-6, Plants. There are no plans to introduce sensitive animal species within any of the Natural Areas. The potential changes to access resulting from sensitive wildlife being present are discussed in MR-3, Wildlife. In general, if visitors remain on established trails and keep their pets on leashes when required, there should be no need to prohibit access or install fencing in sensitive species habitats.

## **MR-9. CREEKS**

### **Issue:**

There are two creek habitats within Natural Areas: Islais Creek in Glen Canyon and Sanchez Creek in Sharp Park. There were 32 comments regarding creeks. Some of these questioned the feasibility of stream restoration without an increased quantity of higher-quality water. Other comments indicated that restoration work already completed at Glen Canyon has resulted in increased water in the stream and better wildlife habitat. Many of the creek comments were directed at Sanchez Creek in Sharp Park. These comments indicate that Sanchez Creek is a valuable resource but that it did not receive enough attention in the Public Draft. Some comments stated that the contamination of the creek from the abandoned rifle range must be addressed while others asserted that the entire creek (even the portion that flows through the golf course) should be considered a natural area and should be restored.

### **Reply:**

Most of the comments relating to Islais Creek in Glen Canyon supported the restoration work done in the creek. They indicated that recent removal of blue gum eucalyptus, Himalayan blackberry, and Cape ivy (*Delairea odorata*) has resulted in an increase in wildlife use of the creek. However, some comments indicated that the instream structures in the creek have accumulated sediment and are not functioning as designed. The instream sediment structures are recommended for rehabilitation in GC/OH-10c. Artificial augmentation of water supply to the creek is probably not feasible. However, the recommendations in the Final Draft call for reducing sources of sediment (see GC/OH-10), which will help increase flows. Improvements to trails, as recommended elsewhere within the Final Draft, also should help reduce sediment inputs

to the creek. The Final Draft outlines monitoring protocols that could be used to evaluate whether the restoration sites are functioning as designed.

Several comments indicated that Sanchez Creek in Sharp Park was not adequately addressed, specifically in relation to the issue of lead leaching from the abandoned rifle range into the portion of the creek that runs through the rifle range. Issues related to the rifle range were not included in the Draft Plan because this section of the creek is outside of the Natural Area (Figure 6.4-1). This omission was an oversight. Leaching lead from the abandoned rifle range may affect the downstream section of Sanchez Creek. This issue, and a corresponding recommendation regarding clean up of the contaminated soils, have been included in the Final Draft (Recommendation SP-12a).

## **MR-10. PLAN COSTS**

### **Issues:**

Most of the comments in this theme related to the cost and feasibility of implementing the Public Draft recommendations. Others indicated that they valued other SFRPD functions such as maintenance activities (trash removal and restroom upkeep) over ecological improvements and that money should go to such maintenance rather than Natural Areas management. Many of these comments question how priorities were established and funding was allocated between priorities.

### **Reply:**

In March of 2000, the citizens of San Francisco approved Proposition C, the Open Space Fund. The Open Space Fund assures allocations for the Natural Areas Program (along with other programs such as after-school recreation programs, urban forestry, community gardens, and volunteer programs) in the amount allocated for the program from the Park and Open Space Fund in the Department's fiscal year 1999-2000 budgets. In fiscal year 1999-2000, the Natural Areas Program was allocated \$400,000. Therefore, base funding of \$400,000 will be allotted each year for management of the Natural Areas until the year 2030. The majority of these funds are used to pay for the salaries of Natural Areas Program staff, which perform the maintenance of these areas. Volunteer resources are also used to perform some of the Natural Areas maintenance (see Section 1.3 of the Final Draft regarding volunteer resources).

In addition to the passage of Proposition C, which mandates funding for the Natural Areas Program, several planning documents describe the value of these areas to San Francisco. Among the documents that describe the value of Natural Areas are the General Plan of the City and County of San Francisco (Policy 2.13 of the Open Space Element), the City's Sustainability Plan (City and County of San Francisco 1997) and the Significant Natural Resource Areas

Management Plan (SFRPD 1995a). These documents are described in greater detail in Section 1 of the Final Draft.

In addition to the Open Space allocation, grants have been secured for various Natural Areas. These funds are largely used to implement capital projects, such as the trail and creek restoration project recently completed in Glen Canyon Park. Between 1999 and 2003, over \$2 million in outside grant monies were secured for capital and other Natural Areas projects.

Like Park Master Plans, the purpose of the Final Draft is to describe improvements to the park landscape that are consistent with broad community needs; these recommendations are made somewhat independently of current funding resources. The Final Draft is a forward-thinking document that describes land use changes, park improvements, maintenance and operations objectives and actions. While recommendations described in the Final Draft need to be within the realm of reason, they need not always be linked to specific funding sources. Because funding and staff resources fluctuate, some elements of the Final Draft may not be implemented. This situation is not unusual. For example, not all elements described in the Park Master Plans for Buena Vista or McLaren Park have been implemented. When Master Plans are revised, elements that have not been implemented may be carried forward to the revised plan or removed from consideration.

Because the recommendations described in the Final Draft exceed the Natural Areas Program's current resources, prioritization is critical. The Final Draft prioritizes maintenance activities in certain Management Areas over others; for example, MA-1s are prioritized over MA-2s, and MA-2s over MA-3s. Therefore, Natural Areas Program staff resources currently available through the Open Space Fund will be devoted primarily to maintenance activities described in the MA-1 and MA-2 areas in the Final Draft.

Due to the complexity of the Final Draft, it is not feasible to conduct a detailed cost analysis of the Final Draft.

## **MR-11. PROJECT MERITS**

Project merit comments reflect a reader's opinion about a particular issue without recommending a change to the Public Draft itself. These ranged from commentators who expressed their support of the Natural Areas Program to those opposed to the fundamental values of the Program and Natural Areas. There are people who think the Natural Areas Program is the wrong place to spend money, and others who think not enough money is spent. There are project merit comments for all of the themes as well as the Public Draft itself.

Some of the major comments within the project merit category included the assertion that people should take precedence over plants and that parks in San Francisco should be made completely available to visitors and their pets regardless of the sensitive species. Other sub-themes include statements about invasive species versus native species, urban parks versus natural areas and wildlife refuges, and questions on the benefit of spending money on the Natural Areas.

Project merit comments, while not addressing the Public Draft itself, reflect the high level of interest that people have in the Natural Areas. Because there is no place for such opinion comments to be incorporated into the Final Draft, project merit comments are not treated further within this document. These comments are included in their entirety in the Response to Comments and are part of the public record. These comments are available for review by the Recreation and Park Commission.