



**SAN FRANCISCO
PLANNING DEPARTMENT**

RECREATION & OPEN SPACE ELEMENT

FINAL DRAFT: MARCH 2014

**All Public Comments on 2013 Draft and Responses to Those
Public Comments**

Part 1: Individual Comments

Alice Rogers – January 20, 2014

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have reviewed your comments in their entirety. Below you can find how your comments have contributed to improve the ROSE as well as the Department's responses to your comments and questions.

All comments the Department has received have been broken down by themes as described in the Memo to the Planning Commission, dated March 13, 2014. In **bold** below are these themes, followed by the highlights of your comments under that theme *in italics*. Finally the Department response is listed for each theme of your comments.

High Needs Areas

Comment highlights

- *Writing to support Jamie Whitaker's request to update maps with Census Block data. Parcel-to-parcel population in D6 is extremely diverse, and is not reflected in ROSE maps.*

Department Response

We have made additional refinements to our high needs analysis and maps in response to comments by the Commission and members of the publi, including yours. In the 2013 draft, we had used the American Community Survey data (2007-2012). We appreciate that you brought to our attention that this data may not reflect an accurate image of demographic information at a smaller geographic unit – such as the block group level. Therefore, we refined this analysis using the Census 2010 data at block group level as a data source. While the Census 2010 data represents actual counts, the American Community Survey data is based on sampling and estimates. Changing the data source the population, children, and youth density map reflects an accurate picture of demographics in areas such as SoMa.

From: [Alice Rogers](#)
To: [Haddadan, Kimia](#)
Cc: [Jamie Whitaker](#); [Kim, Jane](#); [Angulo, Sunny](#); [Toby Levy](#); [Rachel Norton](#); [Allan Low](#)
Subject: Comments on November 2013 Draft Recreation & Open Space Element
Date: Monday, January 20, 2014 2:39:33 PM
Attachments: [SoMa_KidsUnder5_2010CensusData.pdf](#)

20 January, 2014

Kimia Haddadan

San Francisco Planning Department

1650 Mission St. 4th Floor

San Francisco, CA 94103

Re: 2013 Draft ROSE

Dear Ms Haddadan,

I am writing to support Jamie Whitaker's January 12th, 2014 request, as excerpted below, with the added note that Census BLOCK Data be used for analysis citywide, not just in the SOMA area:

- **Census Tract data** for South of Market **needs to be replaced by Census Block data to show the nuances on a Census block-by-block basis**. Specifically, the maps of Youth (ages 0-17) and Seniors (ages 65 and Over) on page 26 along with the Population Density map on page 25 would look quite different for SoMa if the Planning Department used Census Block data instead of the Census Tract data which is very diluted by the massive amount of commercial zoned blocks, Transbay/former Freeways/empty lots, and other blocks included in the Census Tracts with zero residential uses.

Since the ROSE is looking at fine-grained policies affecting populations within a 5- or 10-minute walk from open space/recreation areas, and further since it is seeking to target high needs populations, it is critical that the most detailed census information be used.

While I cannot speak first-hand about the socio-economic and age diversity in all district neighborhoods throughout the City, I can say first-hand that the population parcel to parcel in District 6 is extremely diverse. In my block alone (South Park), we have 84 units of SRO housing, 24 rooms of senior Filipino housing, 103 units of below market rate housing adjacent to the park on 3rd St, a handful of million dollar-plus units, and the balance median income units. This diversity--and diverse need--is lost in more macro data.

As further illustration, I've attached a document Jamie Whitaker provided on SOMA Kids under 5.

Having served on the District 6 Open Space Task Force, on the South Park Improvement Association, and as a current member representing District 6 on the SF Parks Alliance Parks Policy Council, I have an active interest in making sure population pockets in need, wherever they exist, are properly served. Please be sure this vision document does that by recalibrating maps using the vital Census BLOCK data.

Sincerely,
Alice Rogers

.....

Alice Rogers

10 South Park St

Studio 2

San Francisco, CA 94107

CC: Supervisor Jane Kim, Legislative Aide Sunny Angulo, Prosac Board Member Toby Levy, Parks and Recreation Commissioner Allan Low, SF Parks Alliance Policy Director Rachel Norton, D6 Open Space Task Force Member Jamie Whitaker

Amber Hasselbring, Nature in the City – January 27, 2014

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have reviewed your comments in their entirety. Below you can find how your comments have contributed to improve the ROSE as well as the Department's responses to your comments and questions.

All comments the Department has received have been broken down by themes as described in the Memo to the Planning Commission, dated March 13, 2014. In **bold** below are these themes, followed by the highlights of your comments under that theme *in italics*. Finally the Department response is listed for each theme of your comments.

Biodiversity & natural areas management

Comment highlights

- *Objective 4: Native vs. non-native distinction can be counterproductive -- both can have ecological diversity/habitat value. Better to focus on specific plantings/plant communities and appropriateness for given context.*
- *Nature in the City supports NAP management efforts. They do not remove the plants only because they are non-native. They remove plants to create a healthier, vibrant, and dynamic ecosystem.*
- *Policy 4.1: Reorder as "preserve, protect, and restore." and specify which species are endangered/locally threatened/locally present/locally abundant/ invasive.*
- *Policy 4.2: Natural Areas should be preserved and never be available for other uses.*
- *Policy 4.3: Remove bullets not relevant to biodiversity (water conservation, energy efficiency, etc.)*
- *Golden Gate Park and McLaren Park should be emphasized as opportunity for environmentally sustainable park sites.*

Department Response

We reordered Policy 4.1 to read "preserve, protect, and restore." In the sentence at the top of page 42 regarding rare/endangered species, we modified the list for accuracy. Policy 4.3 emphasizes that invasive species need to be replaced ("Native and drought-tolerant plants: The City is working to replace invasive and water-intensive species and species of minimal habitat value with species that fit better with San Francisco's natural environment").

In Policy 4.3, elements not related to biodiversity have been separated from the list and made into a new policy focused on environmental sustainability in all parks ("Include environmentally sustainable design practices in construction, renovation, management and maintenance of open space and recreation facilities").

In regards to your comment that natural areas should be preserved and never be available for other uses, the Recreation and Parks Department has developed the Significant Natural Resources Area Plan, which thoroughly discusses natural areas.

Nature in the City

P.O. Box 170088
San Francisco, CA 94117
415-564-4107
natureinthecity.org



January 27, 2014

Kimia Haddadan
San Francisco Planning Department
1650 Mission St. 4th Floor
San Francisco, CA 94103

Subject: Nature in the City's Comments on the SF Planning Department ROSE Plan

Dear Kimia Haddadan,

Nature in the City is excited to participate in ongoing efforts to strengthen ties for San Franciscans to nature, right here in San Francisco. Overall, we advocate for strengthening overall public open space requirements, maximizing ecological restoration and protections for sustainable biological diversity, and advocating for an integrated stewardship plan for the care of our open spaces.

Specifically, we wish to comment on the below:

- Plants: native vs. non-native, some non-native plants are beneficial for ecological diversity and habitat, some are not. Let's avoid making blanket distinctions, and instead focus on specific plantings, communities of plantings, and their value and appropriateness in a given location (Green Connections Plant list will be forthcoming)
- Nature in the City wholeheartedly supports the Natural Areas Program management efforts. They do not remove plants only because they are non-native. They remove plants to create a healthier, vibrant, and dynamic ecosystem. They also work regularly with volunteers and create an ethic of stewardship among our community. When the Natural Areas Program does "ecological restoration", this does not mean they are recreating a moment in time. It means they are responding to what is and enhancing biodiversity, water flow, soil health and livability for a larger degree of complexity to exist.

Nature in the City

P.O. Box 170088
San Francisco, CA 94117
415-564-4107
natureinthecity.org



We also wish to comment more specifically on Policy 4.1

1. Please reorder the title: “Preserve, protect and restore...”
2. In first paragraph, please specify which species of plants and animals are endangered, locally threatened, locally present, or locally abundant.
3. In the second paragraph, please note which non-native species are a threat to the abundant health and diversity of our ecosystems, not just the native vs. non-native dichotomy.
4. Top of page 43: Natural Areas and protected open spaces should NEVER be available for “other uses” such as development, off-leash dog walking, private enterprise.
5. Please remove the bullet points in Policy 4.3 that have nothing to do with biodiversity: Energy production and efficiency, Water conservation etc.. no mention of nature and biodiversity.
6. Golden Gate Park and McLaren Park, the largest parks in San Francisco, should be managed as outstanding examples of environmentally sustainable park sites, by for example, managing the native oak woodlands via ecologically sustainable landscaping best practices – using native plants, gardening for wildlife, water conservation and invasive plant management – we can showcase the natural beauty available to us all.

Thank you for your time and effort in reviewing our comments. Please feel free to reach out with any questions you may have for us.

Sincerely,

A handwritten signature in black ink, appearing to read 'Amber Hasselbring', with a long, sweeping underline that loops back to the right.

Amber Hasselbring, Executive Director

Anastasia Gilkshtern – January 6, 2014

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have reviewed your comments in their entirety. Below you can find how your comments have contributed to improve the ROSE as well as the Department's responses to your comments and questions.

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Biodiversity & natural areas management

Comment highlights

- *Pesticides: NAP should not be allowed to use toxic Tier 1 & 2 herbicides which have been linked to many negative health and environmental impacts. In 2013 NAP used more herbicides than all other RPD land combined, despite only using 1/4 of land. ROSE should ban use of Tier 1 & 2 herbicides.*
- *Policy 3.6: All healthy trees should be preserved. SNRAMP proposes to eliminate 18,500 healthy park trees and should not be allowed.*
- *"Native species": term is not defined and should not be used. Biologists can not identify without prior knowledge. Should not get preferential treatment.*

Department Response

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have taken note of your comments in support of preserving trees and reducing the use of toxic herbicides in parks and open spaces.

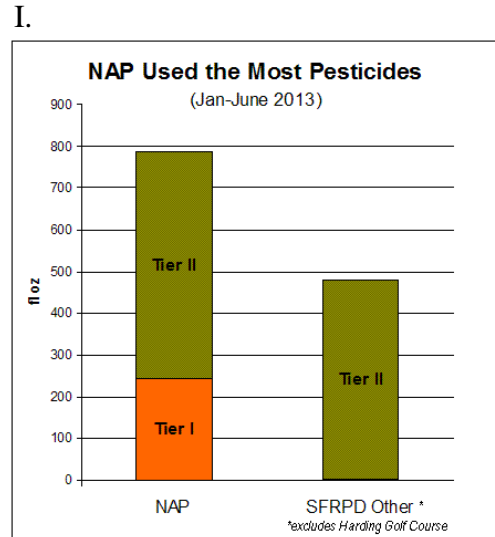
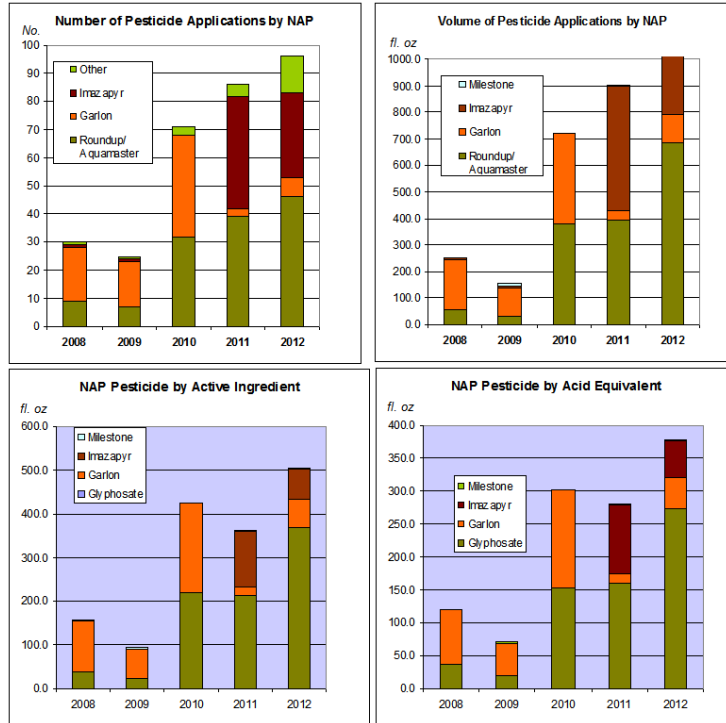
While an outright ban of herbicides goes beyond the scope of this plan, we have made edits to Objective 4 to emphasize the need for a balanced approach to habitat management that prioritizes holistic ecosystem health and resiliency. Policy 3.6 also cites the City's draft Urban Forest Plan, which will help protect street trees and will be followed by subsequent planning efforts to consider how trees are managed on park and private lands. The Significant Natural Areas Plan is a separate plan from the ROSE, so the comment about SNRAMP is not relevant.

We have also expanded Policy 4.3 and added an additional Policy 4.4 focused on environmentally sustainable practices in construction, renovation, management and maintenance of open space and recreation facilities. This policy states that the City should continue to follow the Integrated Pest Management (IPM) ordinance.

With regard to your comment on the term "native species", SF Environment has provided two resources that ecologists use to catalogue native species, which are in active use by native plant restoration efforts. They are:

A Flora of San Francisco, 1958 by John Thomas Howell

The San Francisco Plant Checklist: <http://www.wood-biological.com/san-francisco-plant-checklist/>



The San Francisco Recreation and Park Department uses very toxic - tier I & II - herbicides in our parks. There are epidemiological links to several cancers including **prostate, non-Hodgkin lymphoma, leukemia, multiple myeloma, and breast cancer**. More and more non-industry-funded scientists are finding links between these chemical and all sorts of problems, including **cell death, birth defects, miscarriage, low sperm counts, DNA damage, and destruction of gut bacteria**. The Natural Areas Program (NAP) is the worst offender.

The use of Tier I and II herbicides in so-called “natural” areas, has increased by all measures – the number of applications, volume of herbicides used, volume of active ingredient, and volumes by acid equivalent – by 200% to 400% from 2008 (first year for which the data is available) to 2012.

In first half of 2013 “Natural” Areas Program (NAP) had used much more herbicides than all other parts of Recreation and Park Department’s combined (including all golf courses, except Harding). To have a complete picture, keep in mind that NAP controls $\frac{1}{4}$ of the city park land. So to have a proper comparison you have to multiply NAP amounts by 3 giving almost 5 times more poison per unit of land ($790 \times 3 \div 480$).

I assume, these toxins were used in all the years since the NAP was established. I definitely know that they were used in all the years from 2001 on: it was the year when I got my dog and started walking on Mt. Davidson regularly – and complaining to IPM regularly (using the phone number listed on the “Notice of Pesticide Application”). I didn’t know at that time HOW BAD these toxins are.

Routinely used by RPD/NAP are:

Imazapyr (Polaris – also marketed under the names Chopper, Arsenal, Assault, and a couple of others) - classified as Tier II (more toxic) by the San Francisco’s Department of the

Environment. It persists in soil with a half-life of 14 days to 17 months. Studies suggest that imazapyr residues damage plants at concentrations that are not detectable by laboratory analysis. It is water soluble and does not readily bind to organic material in soils, so it can travel through soil with water and enter groundwater. It can also move with runoff and enter the surface water. Therefore it is classified as highly mobile. In other words, it spreads. Its breakdown product is neuro-toxic to humans. It is also toxic to fish, honey bees, and earthworms. It's banned in Europe since 2007 (in Norway since 2001), and neighbors are fighting against its use in privately owned forests in Northern California.

Aminopyralid (Milestone™ – also marketed as Forefront, Chaparral™, and Opensight™) is also classified as Tier II (previously classified as Tier I, “most toxic”, it was reclassified in 2013). It is even more persistent than imazapyr. If animals eat and excrete it, the excreta are still poisonous – as is the manure made from it. Thousands of gardeners, organic farmers, and commercial growers in the United Kingdom and U.S. lost their tomatoes, beans and other sensitive crops to manure from the livestock which was fed hay from the fields treated by aminopyralid. Organic farmers also lost their organic certifications. This poison can damage sensitive crops at levels as low as 10 parts per billion. Aminopyralid is banned in New York State because of the potential for water poisoning. possible. NAP's used it in Lake Merced, Pine Lake, Glen Canyon, and Mount Davidson, all of which are areas where water contamination is possible.

Glyphosate (Roundup, Aquamaster), classified as Tier II, is one of the world's most widely used herbicides. It has been associated with pregnancy problems and birth defects (toxic to placental cells) and may be an endocrine disruptor in human cells.

Triclopyr (Garlon), classified as Tier I, causes an increase in breast cancer incidence in lab tests, an increase in genetic damage (dominant lethal mutations), damages kidneys and causes reproductive problems. It is highly toxic to fish, inhibits anti-predatory behavior in frogs, and decreases survival rate of nestling birds that have ingested it. It can contaminate water supplies.

The use of these herbicides is the crime against San Francisco residents and the environment. Nothing can justify their use, especially the dubious goal of replacing one kind of vegetation with another.

As stated in Health and Safety principle of ROSE: “Open space should increase the City's capacity to be a safe and healthy place to live” and the standards should support “the long-term health of people, plants, and animals”. It's not healthy to use toxic and persistent chemicals in the city parks. It does not qualify as “environmental stewardship, resource conservation, and ecological responsibility”.

It's of utmost importance that the ban on tier I & II herbicides is included in ROSE.

II.

Policy 3.6 of ROSE states: “The urban forest contributes substantially to our quality of life and to the ecological functioning of our city. Trees ... soften the urban environment, provide habitat,

improve air quality, absorb carbon, and mitigate storm water runoff.” They also stabilize the soil, preventing landslides, provide wind and sound barriers. It is especially important to preserve and maintain all healthy city trees at the time of accelerating global warming. Recently, we crossed the threshold of 400 parts per million of carbon dioxide in the Earth’s atmosphere – higher than at any time since humans populated our planet.

San Francisco has one of the lowest canopy covers of any major city in the US – only 13.7% against a national average of 22%.

But instead of planting trees and preserving the ones which we are fortunate to have, San Francisco treats more than hundred years old trees – with another two to four hundred years of life left in them – as if they are weeds. As you know there is currently a plan – SNRAMP – which proposes to eliminate 18,500 healthy city trees: 3,500 in the city proper and 15,000 in the Sharp Park to **“convert MA-1 and MA-2 areas to native scrub, and grassland habitats.”**

But even before the certification of SNRAMP EIR the trees are being destroyed. It seems that every capital project that San Francisco Rec and Park undertakes results in losing trees. As an example, in Glen Park, between the renovation of the Rec center and the new Trails project, around 100 mature trees were removed. The city doesn’t count – but hundreds of trees were destroyed during the years due to the homophobic idea that the trees deemed non-native/invasive are to be eliminated.

It is necessary to include a ban on cutting healthy city park trees in ROSE.

III.

What is “native”?

It’s what’s believed by some “to have been present in an area at some (essentially arbitrary) point in the past. Almost always there are no studies of what was actually there from a functional standpoint; usually there are no studies at all beyond the merely (and superficially) descriptive”. No biologist can identify what species is native to an area without prior knowledge. There is no measurable criteria, no observable characteristic to distinguish native from non-native. The so-called “native” plants are no more beneficial than those condemned as “non-native”. And native restorations are actually harmful to the environment (herbicides use, destruction of trees).

Calls for preferential treatment of “native” plants should be removed from ROSE.

Sincerely,

Anastasia Glikshtern
150 Chaves Ave.
San Francisco, CA 94127

Arthur Feinstein, Sierra Club – January 27, 2014

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have reviewed your comments in their entirety. Below you can find how your comments have contributed to improve the ROSE as well as the Department's responses to your comments and questions.

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Biodiversity & natural areas management

Comment highlights

- *Policy 4.2: Natural Areas (and specifically privately-owned natural areas) should be preserved and not available for development or other uses.*

Department Response

With regards to your comments on allowing other uses within natural areas, in Policy 4.2 we have provided a balanced discussion, including several decision-making criteria, for how the City may balance the need to protect invaluable natural resources in areas that are not owned by RPD in the context of competing needs for land (see for details). Additionally, RPD's SNRAMP program addresses areas already designated as "natural areas."

Recreation (and Open Space)

Comment highlights

- *Should set (or continue) an acreage goal for parks (as is currently in the 1986 ROSE)*

Department Response

The reason that the 2013 ROSE does not have a quantitative metric for open space (such as acreage) is that the current standard widely available is a national standard which is not applicable to a dense City such as San Francisco. San Francisco, similar to other dense cities in the nation, maintains a skewed rate of open space per person compared to the standard averages provided by national recreation and parks organizations.

Recognizing this challenge, the ROSE uses a different methodology to evaluate the need for open space and recreation. The high needs area analysis incorporates a walkability analysis which identifies areas in the City that are not located within a walking distance to playgrounds, rec centers, and passive recreation areas. The Department believes that this access analysis better suits the urban character of San Francisco compared to a standard and universal metric that is created for use of by suburban and rural jurisdictions.

Public-private partnerships

Comment highlights

- *Need to urge caution over public-private partnerships. Unless such partnerships leave decision-making power to City, can easily become a tool for corporate/individual interests to achieve own goals.*

Department Response

The language of Policy 6.1 has been updated to further emphasize that the City has a primary responsibility to fund adequate, well-maintained parks and recreational facilities. That said, the policy acknowledges that needs are so great that costs will inevitably outpace available funds, and lists a range of potential supplemental sources of funding, including public-private partnerships, that could be explored to help increase funds and the City's capacity to provide a high quality open space and recreational system. We have added language regarding public-private partnerships to emphasize that such arrangements would need to be part of a transparent, accountable process.

These funding options are not intended to replace the City's obligation to fund the park system, and the policy calls for the City to evaluate these options to assess which are an appropriate fit.

From: [Arthur Feinstein](#)
To: [Haddadan, Kimia](#)
Subject: ROSE comments
Date: Monday, January 27, 2014 2:12:38 PM
Attachments: [ROSE 2014 cmmnts Jan.doc](#)



San Francisco Group

January 27, 2014

Kimia Haddadan

San Francisco Planning Department

1650 Mission St. 4th Floor

San Francisco, CA 94103."

Sent by email to:

Kimia.Haddadan@sfgov.org

RE:

Dear Ms. Haddadan:

The Sierra Club appreciates the opportunity to continue our comments on the proposed Revisions to the ROSE. We understand that the comment deadline has been extended to January 25 and since that is a weekend we assume you meant the next closest working day, i.e. January 27, 2014.

Our comments are brief.

1) We regret your response to our request that the City set goals for (or rather continue the goal set in the previous ROSE, 5.5 acres per 1000 residents) for meeting the City's open space/parks acreage needs. Your response to our comments:

"San Francisco is a city with limited land supply and very built out, the priorities over the next 25 years will be to preserve and improve what already exists and to focus new open space in high needs areas. (Response

to comments, pg. 27)”

is a sad one. Instead of recognizing that people need parks and open space for active and passive recreation that can only be answered by adequate park acreage the City's response is that we don't think we can do it. Inspiring goals can result in unanticipated success. Abandoning goals can only result in failure. The ROSE is thus a recipe for failure and a tacit acknowledgement that the people of San Francisco will not be adequately served by its park and open space system. To insist, as the City does, that by invoking multiple and “highest” uses for City parks that those needs will be met is sophistry. There is a limit to what uses an acre of park can provide. When talking about parks and open space, acreage does matter.

We again urge that the ROSE set, or continue the ROSE's current, an acreage goal for parks and then let our elected officials see if that goal can be met, rather than simply abandoning such a goal.

To be clear, we agree that high need areas should get attention. It's simply that much of the City is a high need area when it comes to open space and parks.

2) We are concerned over the language found at the top of page 43 of the proposed ROSE:

Given constraints on the City's financial resources, and the increasing demands for open space, it is clear that public acquisition for all natural areas that are in private ownership may not be an option. Furthermore, there may be other uses of the site that may take precedence. However, if such an area is at risk of loss through development, the site should be examined as a candidate for open space acquisition. Relative importance of the site as a natural area should also be assessed. If the area is not to be publicly acquired, the Planning Commission may require any development that is approved on the site to preserve the most important portions of the area, if found feasible and consistent with the Planning Code. (ROSE , pg. 43)

It is again a very defeatist attitude. The City is not overflowing with “natural areas”. The number of such sites that are yet to be preserved is limited. A more proactive approach would be healthier.

We are, as a civilization, witnessing that the impacts we have on our natural world can have dire impacts, for example, and the most dire, is climate change. Reducing our impacts on our natural world now appears to be not a luxury but rather an essential part of our way of life.

While preserving San Francisco's natural areas no doubt will play a small role globally, it is the cumulative global impacts of all such actions that will be crucial. It is unlikely that all privately-owned natural areas can be preserved, but the ROSE should encourage the preservation of those areas to the greatest degree possible, rather than at the beginning state that such a goal is impossible.

3) We continue to urge caution over public/private partnerships. Unless such partnerships leave all decision-making to the City, this becomes a tool for individuals or corporations to achieve their own goals rather than those that might be best for the City.

Thank you for your attention to our concerns.

Yours,
Arthur Feinstein,
590 Texas Street
San Francisco, 94107

Cami Bowles – January 24, 2014

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have reviewed your comments in their entirety. Below you can find how your comments have contributed to improve the ROSE as well as the Department's responses to your comments and questions.

All comments the Department has received have been broken down by themes as described in the Memo to the Planning Commission, dated March 13, 2014. In **bold** below are these themes, followed by the highlights of your comments under that theme *in italics*. Finally the Department response is listed for each theme of your comments.

Preservation of open space

Comment highlights

- *Preservation: parkland needs to be preserved and new buildings should not be allowed, as is currently the case in the 1986 ROSE.*

Department Response

We have made some modification to the language in Policy 1.3 to clarify the meaning of recreational and cultural buildings.

We have received a variety of comments on this policy that would call for a balance between conflicting needs. We have received many comments asking for additional focus on recreation and improving and adding to our existing pool of recreational facilities.

Building new recreational facilities solely through acquisition of additional land is infeasible due to high costs and the scarcity of available land in the City. Therefore, this policy calls for a balanced approach to provide more recreational and cultural facilities through an efficient use of underutilized space within our existing open spaces. This policy provides specific guidelines if new or expanded facilities are proposed and calls for replacement of open space if lost within this process.

Golden Gate Park Master Plan

Comment highlights

- *Proposal to open up the recent 1998 Golden Gate Park Master Plan could lead to undermining the Master Plan.*

Department Response

The Golden Gate Park Master Plan is the result of an extensive city and community collaboration. The result is a very beloved Master Plan for one of the city's most beloved open spaces. The ROSE in no way suggests that any process to review the Golden Gate Park Master Plan should be done unilaterally by the city. However, the

ROSE is a 20 year document and the current Golden Gate Master Plan is now a 16 year old document. Life of policy documents usually span from 20 to 25 years. This ROSE policy calls for improvements to GGP and, per your suggestion, the language has been modified to make it clear that any potential changes to the Master Plan should happen with community collaboration.

From: [Carmi Bowles](#)
To: [Haddadan, Kimia](#)
Subject: 2013 Draft ROSE - preservation of open space in our parks
Date: Friday, January 24, 2014 10:45:07 AM

January 24, 2014

Ms. Kimia Haddadan
Planning Department
1650 Mission Street, 4th floor, SF CA 94103

Re: 2013 Draft ROSE - preservation of open space in our parks

Ms. Haddadan:

I am concerned that the Draft 2013 ROSE encourages building in our parks. Our parkland is limited and precious. Without a firm "no" to new buildings, we leave our parks open to powerful and well-funded special interest groups. Once one building went up, more would certainly follow. San Francisco as a City will become only more dense. To protect our parks as open space for future generations, the 2013 Draft ROSE should have strong restrictions against new buildings in our parks.

San Francisco must budget for more open space and, if a new buildings are needed, the City should allocate funds for both acquisition of the land and the construction of that building. San Franciscans should not have to sacrifice their parks and playgrounds to new buildings. I would like the final 2014 ROSE to reflect that option, as did the 1986 ROSE.

Secondly, the ROSE has incorporated good language on preserving Golden Gate Park's historic value for passive and active recreation within a naturalistic landscape. However, I am concerned that the ROSE's proposal to open up the recent 1998 Golden Gate Park Master Plan to changes could lead to undermining the Master Plan. Please modify that language to stress the importance of evaluating all new proposals for the park within the design intent of the Park and protect the landscape as described in the '1998 Golden Gate Park Master Plan,' Objective II, Policy A: Landscape Preservation and Renewal."

Thank you for your consideration.

Carmi Bowles

1451 44 Avenue San Francisco, CA 94122

Carolyn Johnston, San Francisco Forest Alliance – January 22, 2014

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have reviewed your comments in their entirety. Below you can find how your comments have contributed to improve the ROSE as well as the Department's responses to your comments and questions.

All comments the Department has received have been broken down by themes as described in the Memo to the Planning Commission, dated March 13, 2014. In **bold** below are these themes, followed by the highlights of your comments under that theme *in italics*. Finally the Department response is listed for each theme of your comments.

Biodiversity & natural areas management

Comment highlights

- *Policy 3.6: Two other important benefits of trees not mentioned - aesthetic value for the City skyline; and fog/wind break. Suggests additional language to add. Also suggests adding protection from unnecessary/arbitrary tree removal. Language includes protection for street trees, but not trees in City parks*
- *Policy 3.6: should also mention that half of the 131,000 trees are located in 7 parks - Mt. Davidson, Glen Canyon, Bayview, Lake Merced, Interior Greenbelt, Pine Lake, McLaren.*
- *Policy 4.1: lists ecological communities, but fails to mention eucalyptus forest as an important one. Please provide scientific evidence to support the contention that SF is losing species diversity.*
- *Policy 4.1 / 4.3: refers to native species but the term is not defined. Proposes removal of term. 4.3, 4th bullet point: replace 'native species' with 'drought-tolerant plants'*

Department Response

In Policy 3.6 we added language regarding aesthetics and wind/fog protection benefits of trees, and mentioned the open spaces that contain the most trees. Management of trees in city parks will be addressed in Phase II of the Urban Forest Plan, which is mentioned in 3.6 as a next step.

With regard to your request for scientific evidence to support the claim that San Francisco is losing species diversity, two resources that include historical inventory of plant species in the City are:

A Flora of San Francisco, 1958 by John Thomas Howell

The San Francisco Plant Checklist: <http://www.wood-biological.com/san-francisco-plant-checklist/>

These resources were provided by SF Environment, and are in active use for native plant restoration efforts. We have modified Policy 4.1 to further emphasize the need to consider the ultimate health and resiliency of ecosystems in a holistic way, which could include both native and non-native plants. The ROSE acknowledges the contribution that non-native species can play in promoting local biodiversity. Butterfly bush (native to China) is a good example. Many species of non-native plants can serve local wildlife. Many species do not do much for wildlife habitat, but are enjoyed by humans and are not invasive. Only a small percentage of non-native species of plants are invasive. The ROSE makes it clear that both native and non-native species are valuable. Policy 4.1

states “In addition, parks and open spaces in San Francisco include both native and non-native species, both of which contribute to local biodiversity. The City should employ appropriate management practices, including controlling invasive species, to maintain a healthy and resilient ecosystem which preserves and protects plant and wildlife habitat.”

In response to the edits that were suggested to Policy 3.6 and 4.1, staff was unable to confirm that any of these statements are true and so did not include in the final ROSE.

Carolyn Johnston
President, San Francisco Forest Alliance
106 Dorchester Way
San Francisco, CA 94127
(415) 731-0841
lynjohnston@comcast.net

January 22, 2014

Via Email (kimia.haddadan@sfgov.org)

Kimia Haddadan
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

Re: Draft Recreation and Open Space Element

Dear Ms. Haddadan:

On behalf of the San Francisco Forest Alliance, I propose the following changes to the draft Recreation and Open Space Element (“ROSE”):

Policy 3.6 (page 41) is the only section of the ROSE that mentions trees. The first paragraph of Policy 3.6 lists some of the benefits of trees, but fails to mention two important ones. First, trees are a major aesthetic asset to the city. They are an essential component of the City’s skyline, particularly since many of them are located on hills and can be seen from all over the city, and from neighboring counties. Second, these tall trees located at high points and/or in western parts of the city such as Mount Sutro, Mount Davidson, McLaren Park, Pine Lake and Lake Merced, provide a wind break and absorb the fog, so that neighborhoods to the east of those trees enjoy better weather. These should both be mentioned as among the benefits of the urban forest. After the sentence ending with the word “runoff”, the following sentence should be included: “Trees – particularly tall trees located at high points in the city – are an essential and beautiful part of the City’s skyline, and enhance the City’s scenic beauty. Some of the City’s forested areas improve the microclimates of nearby neighborhoods by sheltering them from wind and fog.” The last sentence of that first paragraph states that “The urban forest requires consistent maintenance . . .” The words “, protection from unnecessary or arbitrary tree removal” should be added after the word “maintenance.”

The first sentence of the second paragraph of Policy 3.6 notes that “approximately 131,000 trees are located in city parks and other SFRPD open spaces.” The following sentence should be added: “Almost half of those trees (60,300) are located in seven city parks -- Mount Davidson, Glen Canyon Park, Bayview Park, Lake Merced, the Interior Greenbelt, Pine Lake and McLaren Park.”

The third paragraph of Policy 3.6 states that the Urban Forest Plan will “protect the City’s street tree population,” but includes no corresponding language about protecting the trees in the City’s parks. The following sentence should be added before the last sentence in the paragraph: “Any forest management plan in the City’s parks should prioritize protection and maintenance of trees.”

Paragraph 1 of Policy 4.1 lists San Francisco’s ecological communities, but fails to mention a significant one – the Eucalyptus forest. This is one of San Francisco’s largest ecosystems, and should be included in the list. The last sentence of that paragraph states that “San Francisco continues to lose species diversity . . .” I do not believe that to be the case. If you have any scientific evidence to support this contention, please send it to me. Otherwise, it should be deleted from the final ROSE.

Paragraph 2 of Policy 4.1 refers to “native species,” but does not define the term. I propose removing that term, which is vague and subject to different interpretations. Please change the paragraph to read as follows: “In addition, parks and open spaces in San Francisco include a large variety of plant and animal species, all of which contribute to local biodiversity. The City should employ appropriate management practices to protect a well-balanced ecosystem which protects biodiversity and wildlife habitat”

The fourth bullet point in Policy 4.3 again mentions “native species,” which is objectionable for the reasons stated above. In the second sentence, please replace “native species” with “drought-tolerant plants.” The last sentence should end with the word “plants.”

Very truly yours,

Carolyn Johnston

Damien Raffa, Presidio Trust – January 25, 2014

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have reviewed your comments in their entirety. Below you can find how your comments have contributed to improve the ROSE as well as the Department's responses to your comments and questions.

All comments the Department has received have been broken down by themes as described in the Memo to the Planning Commission, dated March 13, 2014. In **bold** below are these themes, followed by the highlights of your comments under that theme *in italics*. Finally the Department response is listed for each theme of your comments.

Other Comments (Environmental Education)

Comment highlights

- *Include additional policy or language stressing the need for environmental education, cultivation of ecoliteracy, and community-based stewardship. (Suggested Policy 5.6 text provided; also submitted by San Francisco Parks Alliance)*

Department Response

Thank you for providing suggested policy language on the importance of supporting ecoliteracy, environmental education, and community-based stewardship. We have integrated these concepts into Policy 5.2 ("Increase awareness of the City's open space system").

From: [Raffa, Damien](#)
To: [Haddadan, Kimia](#)
Subject: new ROSE policy addition
Date: Saturday, January 25, 2014 5:29:48 PM
Attachments: [image001.png](#)
Importance: High

Hi Kimia,

After careful consideration of the R.O.S.E. draft I am offering the following proposal on behalf of the Stewardship & Environmental Education Collaborative of San Francisco representing the city's place-based environmental service programs (both non-profit and governmental). A substantive call-out of an education policy is essential for growing and sustaining a San Francisco citizenry that is ecologically aware and responsible to local nature. This additional policy will help bring San Francisco into alignment with other global cities that recognize the vital role of education in conservation efforts as well as quality of life. Here is the proposed additional policy:

POLICY 5.6

Increase broad public understanding of and appreciation for San Francisco's living natural heritage.

In spite of its dense urban development San Francisco offers a treasure trove for discovery and understanding of the natural world. Yet, the fragmentation of natural areas and dwarfing by the urban sphere presents a challenging context for a cohering sense of place and basic eco-literacy, or reading of urbanized landscapes and shorelines. Broad public awareness, appreciation and stewardship of San Francisco's unique urban ecology requires a comprehensive strategic plan for effective lifelong learning in a multicultural context.

1. Identify opportunities for storytelling and interpretation in existing and future parks, parklets, POPOS and other sites where meaningful place-connecting features can be integrated for public benefit. Examples include formal educational signage (kiosks, waysides, ethnobotanical plant identification tags), design elements (place-celebrating botanical and wildlife imagery in tile-based projects, woodwork, ironwork and murals), phone apps (iNaturalist), site-specific call-in audio narratives and other self-guided media.
2. Explore partnerships with local public institutions to create an intentional network of public education about local urban biodiversity and conservation (San Francisco Zoo, California Academy of Sciences, Exploratorium, Randall Museum, Aquarium by the Bay, and others). Collaborate with San Francisco Unified School District (Greening the Next Generation initiative, Education Outside program), city-based universities and colleges (California College of the Arts, San Francisco State University, CCSF), cultural organizations (Mission Cultural Center et al) and related public and school programs (Kids in Parks, Literacy for Environmental Justice, City Walks, Presidio Outdoors) to support the development of a coherent web of educational infrastructure.
3. Develop a city-wide campaign that defines "what it means to be a San Franciscan". Capitalize on the Green Connections model of neighborhood-specific totem species to

nurture place-based civic pride and community. Build upon neighborhood-based identities to a larger sense of place and belonging that results in a collective ethic of care for our precious natural heritage.

4. Develop metrics for a place-connected eco-literate citizenry and evaluate progress over time.

Thanks!

Damien Raffa

Environmental and Outdoor Education Program Manager

Presidio Trust

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San Francisco, CA 94129

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www.presidio.gov

[Facebook](#) | [Twitter](#)

Dee Seligman – January 30, 2014

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have reviewed your comments in their entirety. Below you can find how your comments have contributed to improve the ROSE as well as the Department's responses to your comments and questions.

All comments the Department has received have been broken down by themes as described in the Memo to the Planning Commission, dated March 13, 2014. In **bold** below are these themes, followed by the highlights of your comments under that theme *in italics*. Finally the Department response is listed for each theme of your comments.

Biodiversity & natural areas management

Comment highlights

- *Inaccurate definitions: Native and Natural are conflated; Non-native and invasive are conflated. Some non-native plants are not invasive, and can be naturalized and coexist with native plants, and contribute to biodiversity and habitat value.*
- *Remnants of pre-existing landscapes: what makes a plant native? How far away can it be brought from?*
- *Sustainability is buzzword that is not defined. Should not be used to justify use of herbicides as in NAP.*
- *Policy 4.1: Why are only native species protected, and not non-native species that are part of the ecosystem?*

Department Response

We have taken note of your comments regarding native and non-native species and the need to consider overall biodiversity and habitat value in the management of our parks and open spaces. We have modified 4.1 to further emphasize the need to consider the ultimate health and resiliency of ecosystems in a holistic way, which could include both native and non-native plants.

The ROSE acknowledges the contribution that non-native species can play in promoting local biodiversity. Butterfly bush (native to China) is a good example. Many species of non-native plants can serve local wildlife. Many species do not do much for wildlife habitat, but are enjoyed by humans and are not invasive. Only a small percentage of non-native species of plants are invasive. The ROSE makes it clear that both native and non-native species are valuable. Policy 4.1 states "In addition, parks and open spaces in San Francisco include both native and non-native species, both of which contribute to local biodiversity. The City should employ appropriate management practices, including controlling invasive species, to maintain a healthy and resilient ecosystem which preserves and protects plant and wildlife habitat.

We have added an additional Policy 4.4 that encourages and defines environmental sustainability ("Include environmentally sustainable design practices in construction, renovation, management and maintenance of open space and recreation facilities"). This policy states that the City should continue to follow the Integrated Pest Management (IPM) ordinance to ensure sustainable pest management practices and use of pesticides.

From: [Dee Seligman](#)
To: [Haddadan, Kimia](#)
Subject: Public Comment on draft ROSE 2013
Date: Monday, December 16, 2013 5:37:42 PM

Inaccurate definitions: conflation of Native with natural; conflation of non-native with invasive

- *Native does not equal natural, and non-native does not equal invasive. Both native and non-native plants are natural. It's just that non-native are introduced species.*
- *Some non-native plants are invasive, but there are many more non-native plants that naturalize and learn to co-exist with native plants. Biodiversity is increased by both native and non-native plants.*

Definition of native

- *How long ago must a plant have existed somewhere to be considered "native" and not "introduced"? For example, Luther Burbank introduced Himalayan blackberry seed from India. It has large fruit that birds love. It has naturalized from Washington State to California. Is this native?*
- *"The City is working to replace invasive and water-intensive species with species that fit better with San Francisco's natural environment. In designated natural areas this means planting more native species." (Policy 4.3) WHY?? Are all non-native species invasive and water-intensive? Clearly not!! This is a key concept that the City will apply to all new and renovated open spaces. Why?*

Habitat

- *There are some animals and insects that depend on native species, but non-native species also provide habitat and sometimes habitat that is otherwise unavailable by dormant native plants.*

Remnants of pre-existing landscapes

- *Natural areas should be "remnants of the original natural landscapes", but in fact, many of the native plants are transplanted after being gathered from other locations, such as Twin Peaks, San Bruno Mtn., and Glen Canyon. So what makes a given plant "native"? Does it have to have come from the same spot where restoration occurs, or if brought from somewhere else, how far can it be brought?*

Sustainability

- *This is a buzzword, but it is never defined. Objective 4 says SF can be a leader in creating sustainable spaces by insuring that open spaces enhance and work with "local biodiversity." (Objective 4), but sustainable should not mean the necessary and ongoing use of herbicides nor the long-term requirement for maintenance by volunteers, which is the case for native plants (as documented in the 2007 Report on NAP by the Office of Legislative Analyst).*

Biodiversity

- *Biodiversity is defined as "the variety of living organisms, the genetic differences among them, and the communities and ecosystems in which they occur." That means*

that biodiversity is composed of both native and non-native species, but then the document goes on to state: “the City should employ appropriate management practices to protect a well-balanced ecosystem which protects native species [emphasis mine] and preserves existing wildlife habitat.” (Policy 4.1) Why are only native species protected? Why not non-native, introduced species that are part of the ecosystem also? What if the definition of undesirable San Franciscans included everyone with brown eyes, but blue eyes were ok? There is a hijacking of language that tilts the plan in favor of native species at the expense of useful, non-invasive introduced species.

Sincerely,

Dee Seligman, Ph.D.

2094 Fell St.

San Francisco, CA 94117

Denise Louie – January 11 and 25, 2014

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have reviewed your comments in their entirety. Below you can find how your comments have contributed to improve the ROSE as well as the Department's responses to your comments and questions.

All comments the Department has received have been broken down by themes as described in the Memo to the Planning Commission, dated March 13, 2014. In **bold** below are these themes, followed by the highlights of your comments under that theme *in italics*. Finally the Department response is listed for each theme of your comments.

Park Funding

Comment highlights

- *Funding for the parks should and can be provided by the general fund of the City.*
- *Do not adopt a policy that makes RPD heavily dependent on other sources of money and outside events*
- *RPD's current budgeting is not transparent.*
- *The 2013 ROSE gives vendors the status of "partners"*

Department Response

The challenge around funding parks has been recognized as a major concern within the past decade, as parks have been receiving less and less support from the City's General Fund. The intention of Objective 6 of this policy document is to address this funding challenge without compromising our parks and recreation as public resources. The language of Policy 6.1 has been updated to further emphasize that the City has a primary responsibility to fund adequate, well-maintained parks and recreational facilities. That said, the policy acknowledges that needs are so great that costs will inevitably outpace available funds, and provides a list of potential supplemental sources of funding that could be explored to help increase funds and the City's capacity to provide a high quality open space and recreational system. These funding options are not intended to replace the City's obligation to fund the park system, and the policy calls for the City to evaluate these options to assess which are an appropriate fit.

We have also added language in Policy 6.1 that emphasizes the need for transparency and accountability when pursuing public-private partnerships. Lastly, we have applied modifications to the text to remove the impression of vendors as partners in parks.

Golden Gate Park Master Plan

Comment highlights

- *GGPMP adopted recently and does not need revision. Part of the ROSE and should have force of any other elements of the General Plan. Remove statements about needing to update GGPMP.*

Department Response

The Golden Gate Park Master Plan is the result of an extensive city and community collaboration. The result is a very beloved Master Plan for one of the city's most beloved open spaces. The ROSE in no way suggests that any process to review the Golden Gate Park Master Plan should be done unilaterally by the city. However, the ROSE is a 20 year document and the current Golden Gate Master Plan is now a 16 year old document. Life of policy documents usually span from 20 to 25 years. This ROSE policy calls for improvements to GGP and, per your suggestion, the language has been modified to make it clear that any potential changes to the Master Plan should happen with community collaboration.

Biodiversity & natural areas management

Comment highlights

- *Objective 4: Overall, written in a clear, balanced fashion.*
- *Suggests modifications to Objective 4 including: Reorder as "preserve, protect, and restore", corrections to the list of endangered species,*
- *Please discuss invasive species, which can alter/obliterate native habitat. Non-native species may not contribute to biodiversity.*
- *Page 43: development and 'other uses' should not happen in natural areas.*
- *Policy 4.3: Remove bullets not relevant to biodiversity (water conservation, energy efficiency, etc)*
- *GGP and McLaren Park should be emphasized as opportunity for environmentally sustainable park sites (see for details)*
- *We need plant propagation to make Policy 4.3 possible. Maybe could be a Policy 4.4: coordination among public / private / individuals to grow native plants.*
- *Education: need more encouragement of hands-on learning / volunteer participation in park planting/care. Need incentives for planting native plants.*

Department Response

We reordered Policy 4.1 to read "preserve, protect, and restore." We have also applied the corrections regarding rare and endangered species. We have added language on invasive species to Policy 4.1, noting that they are a contributor to loss of biodiversity. Invasive species also continue to be discussed in Policy 4.3, which reads: "Native and drought-tolerant plants: The City is working to replace invasive and water-intensive species and species of minimal habitat value with species that fit better with San Francisco's natural environment". We have also added language calling for the City and other partners to increase propagation of native and drought-tolerant plant species.

In Policy 4.3, elements not related to biodiversity have been separated from the list and made into a new policy focused on environmental sustainability in all parks ("Include environmentally sustainable design practices in construction, renovation, management and maintenance of open space and recreation facilities.")

We have added language in Policy 5.2 (Increase awareness of the City's open space system) to emphasize the importance of supporting ecoliteracy and environmental education and community-based stewardship (see policy for details).

Other Comments (Maintenance)

Comment highlights

- *Maintenance: Parks need better maintenance, and should have trained (not unskilled) labor. ROSE should include language that requires/promotes employing well-trained staff, esp. gardeners/arborists.*

Department Response

We have amended Policy 1.4 to place further emphasis on the need for maintenance, adding language that the City should continue to employ well trained staff, such as gardeners and arborists and other trades people, and should seek alternative maintenance strategies to ensure better maintenance of parks and recreational facilities.

From: [Denise Louie](#)
To: [Haddadan, Kimia](#)
Subject: ROSE comments
Date: Saturday, January 25, 2014 10:20:08 AM

Hi Kimia,
Here are my updated comments.
Thanks,
Denise

1. First, funding for the parks should and can be provided by the general fund of the City even though in recent years, it has appeared that the parks must rely on outside earnings. The current poor management of RPD moneys, including bond money, is hopefully a temporary condition. But since today RPD is not transparent, their bookkeeping is confused and incomplete, many believe that they do not actually know how much money they have! We ask that you not adopt policy for our parks that make them so heavily dependent on other sources of money and so many outside events. This dependency creates a mindset which corrupts the very purpose of parks.

The 2013 ROSE gives vendors the status of "partners," with the influence that their money provides being more persuasive than the concerns raised by citizens and park users. Please remove any language that speaks about funding necessities and language that favors vendors. City facilities are in a much better position financially than we are led to believe and the ROSE is a long-range document which should not fall victim to this deception about the drumbeat of need for money.

2. I find Objective 4 to be well written in a clear, balanced fashion.

3. Regarding Policy 4.1 title, please reorder as "Preserve, protect and restore...."

4. Regarding Policy 4.1, first paragraph, "red-tailed hawk, gray fox, great horned owl" are not endangered species like the mission blue butterfly.

5. Regarding Policy 4.1, second paragraph, non-native species may contribute to biodiversity, but this is not true in all cases, if at all. There is a school of thought that says any non-native plant does take up space and resources otherwise reserved for native species. If our local native plant species cannot thrive here, chances for their survival and wildlife that co-evolved with them grow dimmer each passing day. Please speak to the harms of invasive species, which may have negative impacts such as altering and obliterating native habitat.

6. At the top of page 43, permitting development and "other uses" of natural areas is not in line with Policy 4.1; such other uses are unacceptable. There is so much land for humans to use; natural areas should be preserved, protected and restored for Nature's sake, not for human needs.

7. Policy 4.3 bullet points shift focus away from biodiversity, such as energy production and efficiency, water conservation, etc. Speak more to nature and biodiversity. Regarding "Native and drought-tolerant plants," do not include drought-tolerant plants in a bullet point title, which shifts focus from biodiversity to water conservation. Instead, focus on habitat and biodiversity plantings in all kinds of places throughout the city, as well as future opportunities. Highlight shining examples like Golden Gate Park and McLaren Park, which should be managed as outstanding

examples of environmentally sustainable park sites where, for example, native oak woodlands are managed via ecologically sustainable landscaping best practices—using native plants, gardening for wildlife, water conservation and invasives control.

8. To support Policy 4.3, we need plants. Include coordination of efforts to grow native plants and make them available to public agencies, private companies and individuals. This could be Policy 4.4.

9. There should be a policy promoting nature education in parks; there should be a policy invoking and encouraging stewardship of our parks, perhaps a Policy 4.5. There should be an encouragement of more hands-on learning and volunteer participation in park plantings and plant care. There should be incentives for planting native plants, which can withstand drought and do not need heavy maintenance.

10. The Golden Gate Park Master Plan was adopted quite recently (1998) and does not need revision. It is a part of the ROSE now and should have the force of any of the other elements of the Master Plan. Please remove any suggestion or statement about the GGPMP needing revisions, because that is considered no longer relevant.

11. Parks need better maintenance and the staff for this should be highly trained and not treated as unskilled labor. There should be a section in the ROSE document which requires and promotes the employment of capable and well-trained staff, especially professional gardeners and arborists. For example, Golden Gate Park needs better and more knowledgeable maintenance, not more high-volume events.

From: [Denise Louie](#)
To: [Haddadan, Kimia](#)
Cc: [Brastow, Peter](#)
Subject: ROSE - comment
Date: Saturday, January 11, 2014 12:32:36 AM

Hi Kimia,

In response to an email from the SF Parks Alliance, I am suggesting an addition to Objective 4, based on Policy 4.1, (Protect, preserve and restore local biodiversity), as well as Guiding Principle #6 (Ecological Function and Integrity). In order to preserve local native plant species and wildlife that co-evolved with them, I think the City should propagate local native plants on an appropriate scale such that plants are sufficiently available primarily for the City's open spaces, but also--to a lesser extent--for private property owned by corporations and the general public in the City.

Therefore, Objective 4 might include a statement to ensure the availability of local native plants through a nursery supported or operated by the City.

I've heard the current status of plant growing efforts described as balkanized; the City needs to organize these efforts. Could this be an opportunity to establish a coordinated effort?

I'm copying Peter Brastow on this email; he may be able to share more information with you. Peter is SF Environment's Senior Biodiversity Coordinator.

Thanks for listening.
Denise Louie

Diane Eisenberg – January 24, 2014

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have reviewed your comments in their entirety. Below you can find how your comments have contributed to improve the ROSE as well as the Department's responses to your comments and questions.

All comments the Department has received have been broken down by themes as described in the Memo to the Planning Commission, dated March 13, 2014. In **bold** below are these themes, followed by the highlights of your comments under that theme *in italics*. Finally the Department response is listed for each theme of your comments.

Recreation

Comment highlights

- *Standards: SF far below national standards in recreation facilities such as soccer fields and tennis courts. ROSE should require more facilities and preserve existing ones. Recreation standards, not acreage, should be used to measure recreation. Benchmark and quantifiable measures, such as NARPA, should be used.*
- *Policy 1.11: Does not sufficiently protect private / non-profit facilities. Needs more guidelines and expressly preserve these facilities or require nearby, affordable replacements.*
- *Need to focus more on recreation Usage indicators: Use-intercept surveys only describe current, not potential use. Many facilities are underutilized because of poor condition. This data should not drive decision-making. City should have a comprehensive survey of recreational needs every 10 years.*

Department Response

We have incorporated language about the need to assess recreation, which is currently a requirement of the City charter. The high needs area analysis incorporates a walkability analysis which identifies areas in the City that are not located within a walking distance to playgrounds, rec centers, and other active and passive recreation areas. The Department believes that this access analysis better suits the urban character of San Francisco compared to a standard and universal metric that is created for use by suburban and rural jurisdictions.

Regarding your comment on Policy 1.11, we understand your concerns about the preservation of private and non-profit recreational facilities. We believe that the policy as written provides a clear description of the important role such facilities may play, and calls for the City to support them when possible. However, since these facilities are private properties, including replacement requirements or explicit protections for them would require additional legislation, and is beyond the scope of the ROSE.

We have added additional references to recreation throughout the document specifically in Policies 1.3-1.4 and Objectives 2 and 6.

Regarding your comment on user surveys, these tools are just one amongst many that RPD uses to evaluate user needs and the quality of facilities, and are aimed at identifying issues raised by current park users. In addition to RPD assessments, reports by the Department of Children, Youth and Families (DCYF) as well as the Controllers Office help identify community recreation needs. Such surveys can inform decisions such as: help

determine the facilities that need renovations, or facilities that need alternative programming, and will not result in removal or demolition facilities. Such data can also be used to further customize the high needs area analysis.

From: [Switzky, Joshua](#)
To: [Diane Eisenberg](#)
Cc: [Exline, Susan](#); [Haddadan, Kimia](#)
Subject: RE: Importance of Recreation in San Francisco
Date: Friday, January 24, 2014 9:00:17 AM

Hello Diane,

Thank you for taking the time to submit your comments on the ROSE. I have passed them along to the planners working on the ROSE.

Cheers,

Joshua Switzky
Acting Director of Citywide Planning

San Francisco Planning Department
1650 Mission Street, Suite 400, San Francisco, CA 94103
Direct: 415-575-6815 **Fax:** 415-558-9005
Email: joshua.switzky@sfgov.org
Web: www.sfplanning.org

From: Diane Eisenberg [mailto:dzoiane@yahoo.com]
Sent: Thursday, January 23, 2014 10:04 PM
To: Switzky, Joshua
Subject: Importance of Recreation in San Francisco

Joshua Switzky, Acting Director of Citywide Planning
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

Dear Mr. Switzky:

I am a San Francisco resident and voter concerned about opportunities and facilities for recreation in San Francisco.

San Francisco is far below national standards in recreation facilities such as soccer fields and tennis courts. As compared to the past, we now have fewer recreational facilities such as swimming pools, ice skating rinks, and bowling alleys. Recreation must be considered a part of the City's infrastructure planning.

The ROSE should facilitate the building of more recreation, and should protect the recreation that San Francisco currently has. The current draft of the ROSE not only fails to save our current recreational facilities, fields, and courts, but actually weakens their protection. In Policy 1.11, page 15, the ROSE says that 'Some private and non-profit facilities act in a quasi-public manner.... These types of facilities should be supported when they serve San Francisco residents, and, if removed, the loss of recreational space they provide should be considered.' What does that mean? This language is not strong enough to prevent the demolition of recreational facilities without

replacement, nor does it provide a guide for prioritizing recreation over other uses. The ROSE should expressly include a policy to preserve the public and private recreation facilities that remain. Any proposal to demolish public or private recreation facilities should mandate that the recreation facility or facilities be replaced, in kind, and be nearby and affordable.

Given the drastic shortfall of recreation in San Francisco, I also support the following specific additions or changes to the ROSE:

Policy 1.3. Preserve existing **recreation** and open space by restricting its conversion to other uses and limiting encroachment from other uses, assuring no loss of quantity or quality of **recreation** and open space.

Policy 1.4. Maintain and repair **recreation** and open spaces to modern maintenance standards.

Objective 2: Increase **recreation** and open space to meet the long-term of the City and Bay Region.

Objective 6: "Secure long-term resources and management for **recreation** and open space acquisition, operations and maintenance."

I also have concerns about methodologies incorporated in or proposed by the ROSE. For example, the 2013 ROSE provides that recreational needs will be determined by usage, as determined by use-intercept surveys. However, many facilities are not being used because they are not currently in usable condition. For example, when it was proposed to use one of the Noe Tennis Courts as a space for dogs, many tennis players came forth to say that they would have played on the courts IF they were playable. Fix up the court and you'll have the players. Similarly, because use-intercept surveys will miss many interested parties, the ROSE should have a comprehensive all-City, all-stakeholders survey of recreational needs every ten years. No further decisions should be made about demolition of recreational facilities until the City has the results of such a survey.

Finally, a recreation standard, not acreage, should be used to measure recreation. Such a standard would show that San Francisco is not doing well. For example, a city our size should have 400 tennis courts; we have 144. A city of our size should have 40 swimming pools; we have 9. The ROSE should use a quantifiable measure and benchmark for recreation, such as NARPA standards, not only to determine how well we are doing in providing recreation but also for setting goals for acquisition of recreation facilities and fields.

Recreation, as well as open space, is an essential part of San Francisco's future, and I urge you to take appropriate action to protect and promote it.

Thank you for your time and consideration.

Sincerely,
Diane Eisenberg
3487 21st St., Apt. 2
San Francisco, CA 94110
dzoiane@yahoo.com

Eugene Bachmanov – January 22, 2014

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have reviewed your comments in their entirety. Below you can find how your comments have contributed to improve the ROSE as well as the Department's responses to your comments and questions.

All comments the Department has received have been broken down by themes as described in the Memo to the Planning Commission, dated March 13, 2014. In **bold** below are these themes, followed by the highlights of your comments under that theme *in italics*. Finally the Department response is listed for each theme of your comments.

Biodiversity & natural areas management

Comment highlights

- *“Native species”*: term is not defined and should not be used. Biologists can not identify without prior knowledge. Should not get preferential treatment.
- *Policy 3.6*: All healthy trees should be preserved, in this time of accelerating global warming and extreme weather. SNRAMP proposes to eliminate 18,500 healthy park trees and should not be allowed.
- *Pesticides*: NAP should not be allowed to use toxic Tier 1 & 2 herbicides which have been linked to many negative health and environmental impacts. Need a City ban.

Department Response

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have taken note of your comments in support of preserving trees and reducing the use of toxic herbicides in parks and open spaces.

While an outright ban of herbicides goes beyond the scope of this plan, we have made edits to Objective 4 to emphasize the need for a balanced approach to habitat management that prioritizes holistic ecosystem health and resiliency. Policy 3.6 also cites the City's draft Urban Forest Plan, which will help protect street trees and will be followed by subsequent planning efforts to consider how trees are managed on park and private lands. The Significant Natural Areas Plan is a separate plan from the ROSE, so the comment about SNRAMP is not relevant.

We have also expanded Policy 4.3 and added an additional Policy 4.4 focused on environmentally sustainable practices in construction, renovation, management and maintenance of open space and recreation facilities. This policy states that the City should continue to follow the Integrated Pest Management (IPM) ordinance

With regard to your comment on the term “native species”, SF Environment has provided two resources that ecologists use to catalogue native species, which are in active use by native plant restoration efforts. They are:

A Flora of San Francisco, 1958 by John Thomas Howell

The San Francisco Plant Checklist: <http://www.wood-biological.com/san-francisco-plant-checklist/>

From: [Eugene Bachmanov](#)
To: [Haddadan, Kimia](#)
Date: Wednesday, January 22, 2014 5:49:23 PM

To: Ms. Kimia Haddadan
San Francisco Planning Department
1650 Mission Street.
San Francisco, CA 94103

Dear Ms. Haddadan,

Below is my comment to Recreation and Open Space Element document.

1.

Here is the definition of "native": it's something that according to some was growing/living in given area at some arbitrarily chosen point in time.

No biologist can distinguish "native" from "non-native" without prior knowledge. It's a faulty/fraudulent concept.

"Restoration" of "native" plants in "Natural" Areas causes a lot of harm by cutting precious San Francisco trees and using very toxic herbicides. It should be banned - not promoted - by ROSE

2.

The global warming is accelerating, extreme weather events are happening everywhere. Trees are very important in absorbing carbon dioxide. They also improve air quality, mitigate storm water runoff, serve as wind and sound barriers, prevent landslides, provide habitat for birds and animals. San Francisco lags behind other major cities in tree canopy coverage. But instead of protection of existing trees they are mindlessly cut with almost every project the city undertakes.

The Natural Areas Program (NAP) in Significant Natural Resource Management Plan (SNRAMP) – proposes to eliminate 18,500 healthy park trees: 3,500 in the city itself and 15,000 in the Sharp Park to **“convert MA-1 and MA-2 areas to native scrub, and grassland habitats.”** RPD/NAP designate trees as "non-native"/"invasive" and eliminates them even before SNRAMP has been certified - increasing air pollution and releasing carbon into the atmosphere. Trees protection clause should be included in ROSE.

3.

San Francisco uses herbicides which have been epidemiologically linked to non-Hodkin Lymphoma, multiple myeloma, leukemia, breast and prostate cancers in the city parks where children play, people and their pets walk, wild life makes its home. The Natural Areas Program (NAP) - which name is a misnomer - uses the most of these toxins. The use of Tier I and II herbicides by NAP has increased by all measures – the number of applications, volume of herbicides used, volume of active ingredient, and volumes by acid equivalent – by 200% to 400% from 2008 (first year for which the data is available) to 2013.

NAP/RPD constantly uses:

Triclopyr (Garlon), Glyphosate (Roundup, Aquamaster), Imazapyr (Polaris), Aminopyralid (Milestone™).

Here is a partial description of harmful effects.

Glyphosate: kills birds, fish, tadpoles, bees, worms - at least 76 different species. It dissolves readily and is very persistent in water. It is listed by PAN International (Pesticide Action Network) as highly hazardous. It is listed as "dangerous for the environment" by the European Union. Its maker, Monsanto, was convicted of false advertising (claiming that Roundup is “practically non-toxic” to mammals, birds, and fish) in France in 2007 and the ruling was upheld by the France Supreme Court in 2009. A University of Pittsburgh biologist has found that the herbicide caused 86% decline in the total population of tadpoles. According to EPA, short term exposure to elevated levels of glyphosate

may cause lung congestion and increased breathing rates and, in long-term exposure, kidney damage, and reproductive effect. It has been associated with Parkinson disease. Increased adverse neurologic and neurobehavioral effects have been found in children of applicators of glyphosate. Female partners of workers who apply glyphosate are at higher risk of spontaneous abortion. Some glyphosate based formulations and metabolic products have been found to cause the death of human embryonic, placental, and umbilical cells in vitro even at low concentrations.

Imazapyr: persists in soil with a half-life of 14 days to 17 months. Studies suggest that imazapyr residues damage plants at concentrations that are not detectable by laboratory analysis. It is water soluble and does not readily bind to organic material in soils, so it can travel through soil with water and enter groundwater. It can also move with runoff and enter the surface water. Therefore it is classified as highly mobile. Its breakdown product is neuro-toxic to humans. It is also toxic to fish, honey bees, and earthworms. It's banned in Europe since 2007 (in Norway since 2001).

Aminopyralid : even more persistent than imazapyr. If animals eat and excrete it, the excreta are still poisonous – as is the manure made from it. Thousands of gardeners, organic farmers, and commercial growers in the United Kingdom and U.S. lost their tomatoes, beans and other sensitive crops to manure from the livestock which was fed hay from the fields treated by aminopyralid. Organic farmers also lost their organic certifications. This poison can damage sensitive crops at levels as low as 10 parts per billion. Aminopyralid is banned in New York State because of the potential for water poisoning.

Triclopyr: causes an increase in breast cancer incidence in lab tests, an increase in genetic damage (dominant lethal mutations), damages kidneys and causes reproductive problems. It is highly toxic to fish, inhibits anti-predatory behavior in frogs, and decreases survival rate of nestling birds that have ingested it. It can contaminate water supplies.

The use of these poisons in San Francisco parks contradicts the Health and Safety principle of ROSE - it doesn't support the "long-term health of people, plants, and animals".

ROSE needs to set up a goal of totally discontinuing and banning their use in parks.

Sincerely,
Eugene Bachmanov
418 Arch St.
San Francisco, CA 94132

Evelyn Manies – January 22, 2014

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have reviewed your comments in their entirety. Below you can find how your comments have contributed to improve the ROSE as well as the Department's responses to your comments and questions.

All comments the Department has received have been broken down by themes as described in the Memo to the Planning Commission, dated March 13, 2014. In **bold** below are these themes, followed by the highlights of your comments under that theme *in italics*. Finally the Department response is listed for each theme of your comments.

Preservation of open space

Comment highlights

- *Preservation: parkland needs to be preserved and new buildings should not be allowed, as is currently the case in the 1986 ROSE.*

Department Response

We have made some modification to the language in Policy 1.3 to clarify the meaning of recreational and cultural buildings.

We have received a variety of comments on this policy that would call for a balance between conflicting needs. We have received many comments asking for additional focus on recreation and improving and adding to our existing pool of recreational facilities.

Building new recreational facilities solely through acquisition of additional land is infeasible due to high costs and the scarcity of available land in the City. Therefore, this policy calls for a balanced approach to provide more recreational and cultural facilities through an efficient use of underutilized space within our existing open spaces. This policy provides specific guidelines if new or expanded facilities are proposed and calls for replacement of open space if lost within this process.

Golden Gate Park Master Plan

Comment highlights

- *Proposal to open up the recent 1998 Golden Gate Park Master Plan could lead to undermining the Master Plan.*

Department Response

The Golden Gate Park Master Plan is the result of an extensive city and community collaboration. The result is a very beloved Master Plan for one of the city's most beloved open spaces. The ROSE in no way suggests that any process to review the Golden Gate Park Master Plan should be done unilaterally by the city. However, the

ROSE is a 20 year document and the current Golden Gate Master Plan is now a 16 year old document. Life of policy documents usually span from 20 to 25 years. This ROSE policy calls for improvements to GGP and, per your suggestion, the language has been modified to make it clear that any potential changes to the Master Plan should happen with community collaboration.

From: [Evelyn Manies](#)
To: [Haddadan, Kimia](#)
Subject: Protecting Parks
Date: Wednesday, January 22, 2014 2:36:57 PM

January 22, 2014

Ms. Kimia Haddadan

Planning Department

1650 Mission Street, 4th floor, SF CA 94103

Re: 2013 Draft ROSE - preservation of open space in our parks

Ms. Haddadan:

I am concerned that the Draft 2013 ROSE encourages building in our parks. Our parkland is limited and precious. Without a firm "no" to new buildings, we leave our parks open to powerful and well-funded special interest groups. Once one building went up, more would certainly follow. San Francisco as a City will become only more dense. To protect our parks as open space for future generations, the 2013 Draft ROSE should have strong restrictions against new buildings in our parks.

San Francisco must budget for more open space and, if a new buildings are needed, the City should allocate funds for both acquisition of the land and the construction of that building. San Franciscans should not have to sacrifice their parks and playgrounds to new buildings. I would like the final 2014 ROSE to reflect that option, as did the 1986 ROSE.

Secondly, the ROSE has incorporated good language on preserving Golden Gate Park's historic value for passive and active recreation within a naturalistic landscape. However, I am concerned that the ROSE's proposal to open up the recent 1998 Golden Gate Park Master Plan to changes could lead to undermining the Master Plan. Please modify that language to stress the importance of evaluating all new proposals for the park within the design intent of the Park and protect the landscape as described in the '1998 Golden Gate Park Master Plan,' Objective II, Policy A: Landscape Preservation and Renewal."

Thank you for your consideration.

Evelyn C. Manies 2439 Turk Blvd. , San Francisco, CA 94118

emanies@gmail.com

cc: Planning Commission
Historic Preservation Commission

Gail Wechsler – January 27, 2014

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have reviewed your comments in their entirety. Below you can find how your comments have contributed to improve the ROSE as well as the Department's responses to your comments and questions.

All comments the Department has received have been broken down by themes as described in the Memo to the Planning Commission, dated March 13, 2014. In **bold** below are these themes, followed by the highlights of your comments under that theme *in italics*. Finally the Department response is listed for each theme of your comments.

Biodiversity & natural areas management

Comment highlights

- *Resident who loves walking the city and enjoying diversity of native plants and animals. Supporting native biodiversity / restoring ecosystems the most important functions of parks and open space.*

Department Response

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have taken note of your comments in support of preserving native plants and animals, and appreciate you sharing about your experiences enjoying nature in the City.

From: [Gail Wechsler](#)
To: [Haddadan, Kimia](#)
Subject: ROSE comment
Date: Monday, January 27, 2014 4:59:01 PM

Dear Ms. Haddadan:

I am a San Franciscan whose idea of a really good time is walking around looking at the terrific variety of native plants and animals that we're amazingly lucky to have here despite the overwhelming amount of pavement here. I believe supporting native biodiversity is one of the most important functions of parks and open space. I urge that the ROSE state unequivocally that the City's priority is to restore its ecosystems and protect biodiversity.

Thank you for the opportunity to comment.

Yours truly,
Gail Wechsler
221 San Jose Ave Apt 5
San Francisco, CA 94110

Greg Gaar – January 23, 2014

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have reviewed your comments in their entirety. Below you can find how your comments have contributed to improve the ROSE as well as the Department's responses to your comments and questions.

All comments the Department has received have been broken down by themes as described in the Memo to the Planning Commission, dated March 13, 2014. In **bold** below are these themes, followed by the highlights of your comments under that theme *in italics*. Finally the Department response is listed for each theme of your comments.

Biodiversity & natural areas management

Comment highlights

- *Policy 2.10: Significant Natural Resource Areas and other potential parkland under city agency jurisdiction (such as PUC) should be accessible to the public and managed by PUC or transferred to RPD. (ex: Laguna Honda, O'Shaughnessy Blvd, Marietta St, Francisco Reservoir)*
- *Policy 4.3: RPD should prioritize propagating SF native plants and avoid invasive plants*

Department Response

We have taken note of your comments in support of preserving/propagating native plants, as well as opening reservoir lands and significant natural resource areas to the public. We have added language to Policy 4.4 ("Include environmentally sustainable design practices in construction, renovation, management and maintenance of open space and recreation facilities") on the need for plant propagation facilities for native and drought-tolerant plants (see policy for details).

Further, Policy 2.10 calls for the City to provide access for recreational uses at PUC reservoirs and other sites, when appropriate. With regards to other natural resource areas, Policy 4.2 outlines a management approach for these areas that balances biodiversity and ecosystem health with other factors, such as public use.

From: [Greg Gaar](#)
To: [Haddadan, Kimia](#)
Subject: Fw: ROSE Comments
Date: Thursday, January 23, 2014 3:08:46 PM

On Thursday, January 23, 2014 2:56 PM, Greg Gaar <dunetansy@yahoo.com> wrote:

Policy 2.10

Significant Natural Resource Areas and other potential parkland under the jurisdiction of other city agencies such as the San Francisco Public Utilities Commission should be accessible to the public and properly managed by the SFPUC or transferred to the Recreation and Parks Department.

Examples include the Laguna Honda Reservoir lands, the slopes above O'Shaughnessy Boulevard and below Marietta Street and the Francisco Reservoir site.

Policy 4.3

Native and Drought Tolerant Plants

The Recreation and Parks Department in Golden Gate Park should prioritize propagating San Francisco native plants and avoid propagating invasive exotic plants.

Native plants are the foundation of all the Earth's ecosystems. San Francisco native plants support local butterflies, dragonflies, bees, birds etc.

Thanks
Greg Gaar
San Francisco

Jake Sigg, California Native Plant Society – January 24, 2014

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have reviewed your comments in their entirety. Below you can find how your comments have contributed to improve the ROSE as well as the Department's responses to your comments and questions.

All comments the Department has received have been broken down by themes as described in the Memo to the Planning Commission, dated March 13, 2014. In **bold** below are these themes, followed by the highlights of your comments under that theme *in italics*. Finally the Department response is listed for each theme of your comments.

Biodiversity & natural areas management

Comment highlights

- *Objective 4 is written in a balanced statement and should be retained. The Working Group comment is uninformed. SF is a recognized biodiversity hotspot and invasive species should not be accorded equal status with natives.*
- *CNPS has conducted weekly work parties since 1989 and has observed the increase in number of invasive plants, and seen several indigenous plants and animals disappear, and many more in steep decline. CNPS refutes Working Group assertion that SF is not losing biodiversity*

Department Response

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have taken note of your comments in support of Objective 4 regarding biodiversity, and appreciate you sharing your experiences from over 20 years of working in native plant restoration.

From: [Jake Sigg](#)
To: [Haddadan, Kimia](#)
Subject: ROSE Objective 4 comment
Date: Friday, January 24, 2014 12:46:40 PM

California Native Plant Society
Yerba Buena Chapter
338 Ortega Street, San Francisco, California 94122

Kimia Haddadan
San Francisco Planning Department
RE: ROSE Objective 4

Ms Haddadan:

The draft ROSE Objective 4 as written is a balanced statement and should be retained. The comment of the Working Group (below) is so tendentious and uninformed that it should be ignored. It was written by someone with no knowledge of the subject.

This writer was a City gardener for 32 years, and in the 23 years since retirement has worked as a volunteer for the Recreation and Park Department to maintain our native biological communities; this participation began long before the creation of the Natural Areas Program.

San Francisco has been recognized by national and international bodies as a biodiversity hotspot, due to the richness of its varied organisms and the variety of its habitats. Those organisms are under pressure by the invasion of exotic organisms that lack the natural controls they had in their home ranges. To accord equal status to these invasive organisms is absurd. There are some nonnative plants which provide food or nesting for local wildlife, but that thin support applies to sometimes a single species, and is lacking the rich panoply of sustenance for the whole wildlife community provided by the plants they co-evolved with.

The statement "Yet, San Francisco continues to lose species diversity due to isolation and fragmentation of habitats." (Policy 4.1, page 42) was challenged by the working group. Our chapter of the California Native Plant Society has conducted 52 work parties per year ever since 1989, working alongside City gardeners. That is approximately 1,350 work parties during which we have acquired intimate knowledge of the land and its denizens. We observe the increase in the number of invasive plants and the corresponding diminution or disappearance of indigenous plants and animals from specific areas. Many of the disappearances have not been reported and do not appear in scientific literature, but I am aware of at least five plant species that have disappeared from the city since 1989. Other species are hanging on by the slenderest of threads, and the number of sites where a given species occurs is declining.

Many people and groups in the city are working to involve the public and youth in ecological stewardship and education to save these remaining pieces of heritage. Stewardship provides unexcelled opportunities for community-building, place-based education, and recreation. The draft language should remain as is.

Jake Sigg, Chair
Conservation Committee

BIODIVERSITY

While more balanced than the 2011 Draft ROSE, the 2013 ROSE offers a view of biodiversity and natural areas in Objective 4 that is still skewed and unbalanced. Biodiversity should include both native AND non-native plants. The 2013 ROSE says that "Parks and open spaces in San Francisco include both native and non-native species, both of which contribute to local biodiversity." (Policy 4.1, page 42.) Planning staff has stated in conversations that sentence defines "local biodiversity" as including both native and non-native plants. However, we remain concerned that the tone of the rest of Objective 4 (especially the emphasis on "natural areas" in Policy 4.2), skews this definition to include a preference for native versus non-native plants. We need a stronger statement that local biodiversity gives both native and non-native plants near equal weight. Without this clarification, this 2013 ROSE could be used to justify destroying existing non-native habitat for no reason other than that it is non-native, as long as a few non-natives are left alone. That is not a balanced approach. In addition, a fair Open Space policy would balance the benefits of restoring "native" habitat in any particular park with the negative ecological impacts of destroying the existing nonnative habitats on ecosystem services (e.g., carbon sequestration, wind reduction, control of erosion, and storm water reduction), and on the animals, insects, and reptiles currently

living there. This balance must be part of the 2013 ROSE -- and, indeed, it is mentioned as desirable at the beginning of Policy 4.1 -- yet the rest of Objective 4 shows little evidence of this balance in wording or in the actions and policies it proposes.

We remain concerned that Policy 4.2 in this 2013 ROSE constitutes a major "land grab" for the Recreation and Park Department's highly controversial Natural Areas Program (NAP).

There is no concept of balance between native and non-native in NAP; it is a native-preferred program. This 2013 ROSE defines "natural area" as "remnants of the historical landscape" (Policy 4.2, page 42). It then directs every city agency to look for "natural areas" throughout the City and to develop management plans for any that are found. While NAP is not explicitly stated as the agency that should manage these areas (an improvement from the 2011 Draft ROSE), it is clear that this 2013 ROSE wants NAP management policies to be replicated throughout the City in these areas.

NAP management policies include removal of non-native species simply because they are nonnative (e.g., cutting down 1,600 eucalyptus trees on Mt. Davidson), heavy use of herbicides, and closure of trails. These NAP management policies are becoming increasingly unpopular as more and more people learn about them. Our concern is that NAP does not just protect remnants of our historical landscape. It takes large areas with thriving non-native habitats and destroys them in order to "restore" them with native plants whether those plants were there historically or not. By equating "natural areas" with "NAP areas," Policy 4.2 seems to be endorsing this unbalanced approach. Again, this puts the ROSE in the position of saying there will be no real balance

between native and non-native, nor between restored native and existing non-native habitats over large areas of City open space that are currently not part of NAP. "Natural" does not necessarily mean "native," yet the 2013 ROSE assumes the two are the same.

People want "natural" areas, meaning areas with plants and trees and no buildings, to be accessible, safe, well-maintained, and green and filled with growing things. People want a variety of plants that look nice, and space that gives them a chance to escape from urban pressures and run, walk, and play with friends, family, and pets. In essence, they want miniature versions of Golden Gate Park in their neighborhood parks.

Nowhere in November 2013 Revised Draft ROSE Comments -- ROSE Working Group Page 11 of 13

this list does it say "native" only. While some native-only areas are good, people do not want the majority of their open space to be native only. Policy 4.2 seems to imply that any newly defined "natural" area should be native only. That is not balanced.

The definition of "sustainability" given in the ROSE is too restricted. In Policy 4.3, the 2013 ROSE says that park and open space renovations or acquisitions should be done in an environmentally sustainable way, and then lists ways in which that can be done, including planting native and drought-tolerant plants and creating habitat for local and migrating wildlife. However, an environmentally sustainable landscape is one, for example, that is capable of existing with little use of herbicides (and certainly not repeated applications) and little use of irrigation. A sustainable landscape is one that can

exist with typical public access and use. A sustainable landscape will not only enhance biodiversity (both native and non-native), but will also provide an attractive, colorful palette throughout the year. These additional definitions and concepts for what constitutes an environmentally sustainable landscape should be included in the ROSE. The 2013 ROSE also contains no protections for public access to and recreational use of open space in the natural areas, whether a NAP-managed area or other "natural" parkland. Fences have been erected to keep people out and signs installed that say "Off Limits" in NAP-managed areas in city parks. Parkland that is locked away from public use ceases to fulfill the open space requirements and needs of the City's residents. The ROSE should be designed to not only expand the amount of open space in San Francisco but also to protect and expand public access to it as well, not just in how you get to the park, but what you can do in the park once you get there. Finally, this 2013 ROSE states, "Yet, San Francisco continues to lose species diversity due to isolation and fragmentation of habitats." (Policy 4.1, page 42) We question this statement. Scientific articles have stated that over the past 150 years, San Francisco has lost only 19 of its native species, while 695 native species remain ("Plant traits and extinction in urban areas: a meta-analysis of 11 cities," by Richard Duncan, Steven Clemente, Richard Corlette, et al., *Global Ecology and Biogeography*, *A Journal of Macroecology*, published online January 17, 2011, Vol. 20, Issue 4). This is hardly the large-scale loss of species implied by this statement in the ROSE. It should be removed.

Jamie Whitaker – January 12 and 14, 2014

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have reviewed your comments in their entirety. Below you can find how your comments have contributed to improve the ROSE as well as the Department's responses to your comments and questions.

All comments the Department has received have been broken down by themes as described in the Memo to the Planning Commission, dated March 13, 2014. In **bold** below are these themes, followed by the highlights of your comments under that theme *in italics*. Finally the Department response is listed for each theme of your comments.

High needs areas

Comment highlights

- *High needs areas map: Flawed use of Census data on a Census Tract basis; need a more nuanced and informative measure such as Census Blocks, esp. in mixed use areas such as SoMa. Use of Census tract data is largely responsible for lack of funds in SoMa through 2012 Parks Bond.*
 - *Specifically maps of Youth and Seniors need updating with Census block data. Ranges should be adjusted to reflect true density.*
 - *Additional map should reflect population density including 31 projects under construction*
- *Existing Open Space map: everything is depicted as green; should have different color for POPOS which are typically concrete and not available for public use out of business hours. Should also differentiate parks that are gated and inaccessible during off-hours or that have limited hours of operation.*
 - *Daycare centers: should be pointed out; 600+ kids spend summers in downtown near parents workplaces.*
 - *See attached maps - Budget Committee and Census Block data."*

Department Response

We have made additional refinements to our high needs analysis and maps in response to comments by the Commission and members of the public, including yours. In the 2013 draft, we had used the American Community Survey data (2007-2012). We appreciate that you brought to our attention that this data may not reflect an accurate image of demographic information at a smaller geographic unit – such as the block group level. Therefore, we refined this analysis using the Census 2010 data at block group level as a data source. While the Census 2010 data represents actual counts, the American Community Survey data is based on sampling and estimates. Changing the data source the population, children, and youth density map reflects an accurate picture of demographics in areas such as SoMa.

In response to your comment about the ranges for youth and seniors, these ranges are based on quantiles and it's unclear what additional breakdown should be provided.

In response to your comment regarding considering population growth as a result of the projects under construction, we have refined our analysis to reflect this concern as well. The 2013 draft or ROSE used Area Plans as a proxy for growth areas. To distribute the future growth more evenly throughout the City, the

Department replaced the Area Plans with another factor: Land Use Allocations. Land Use Allocation distributes projected housing and employment growth as determined by the Association of Bay Area Governments to 981 Traffic Analysis Zones (TAZ). These zones vary in size, from a block around downtown to several blocks in more outlying areas. The allocation of TAZ-specific growth is based on the current development pipeline (development projects under construction, approved or under review) and an estimate of additional development potential for each TAZ. Therefore Land Use Allocation distributes the projected growth more evenly throughout the City. Based on the results of this analysis, staff used the additional population in each TAZ to measure the open space needs of the future population. This change directly addresses your comment about incorporating growth as a result of projects under construction into our needs analysis.

Furthermore, we have modified the map of Existing Open spaces to distinguish between POPOS and other open spaces. Further details on hours of operation would not be feasible to include preserving the legibility of this map..

Lastly, we currently do not have data on all public and private daycare facilities, and they are also outside of the scope of this map. Maps with a greater level of detail at a neighborhood level may also be found in the City's Area Plans, which also provide a more in-depth discussion of local recreation and open space needs, particularly in the Downtown and South of Market areas.

Jamie Whitaker
201 Harrison St. Apt. 229
San Francisco, CA 94105-2049

January 12, 2014

Kimia Haddadan
San Francisco Planning Department
1650 Mission St. 4th Floor
San Francisco, CA 94103

cc: Supervisor Jane Kim
cc: Sunny Angulo
cc: Planning Commissioners
cc: John Rahaim

Subject: Comments on November 2013 Recreation & Open Space Element

Dear Ms. Haddadan,

I have reviewed the November 2013 Final Updated Draft of the Recreation and Open Space Element, and I am very disappointed to see that my feedback to the Planning Department in early 2013 regarding the irrational and flawed use of Census data on a Census Tract basis instead of a more nuanced and informative Census Block basis (important for mixed use neighborhoods like SoMa) has been ignored. This amounts to gross negligence on the part of the San Francisco Planning Department as far as I am concerned.

What I consider just plain negligence by the Planning Department was exhibited in the June 2011 Draft ROSE, and that negligent and flawed usage of Census Tract data is the primary reason why South of Market got stiffed and zero money (until our Supervisor fought to get \$1 million out of the \$195 million) on the 2012 Parks Bond. When you know that District 6 has the least amount of open space per 1,000 residents at 0.17 acres, it is incredibly infuriating to residents to see the Planning Department continue to use Census Tract data in the ROSE instead of Census Block data for our mixed use SoMa District.

It is inexcusable, in my opinion, to not correct the Census Data shown in our mixed use South of Market District in the ROSE so that it shows nuances on a Census Block basis where there are **over 80 children living in a single condo complex** (**The Infinity** at Main and Folsom Streets in Rincon Hill) – instead of the Census Tract data that shows “less than 2.49 Youth (age 0-17) per acre.”

The Census Block data has been readily available so that you can set age groupings based on the full 2010 Census data since at least 2012. There is no excuse, other than gross

negligence, for leaving the nuanced data on a Census Block basis out of the final edition of the ROSE and retaining the faulty (as I pointed out a year ago) Census Tract data.

I am writing to ask that the Planning Department recognize the Department's gross negligence, recognize the potential harm to the health of residents of SoMa if left uncorrected in the ROSE, and do whatever is necessary to make the following corrections that I am now requesting a second time one year after the first requests as they related to the June 2011 Draft of the ROSE.

Please seriously consider these corrections so that South of Market, despite its mixed use zoning, is treated by the City and its Recreation and Parks Department in a geographically equitable manner to the traditional mostly-residential neighborhoods in San Francisco:

- Census Tract data for South of Market needs to be replaced by Census Block data to show the nuances on a Census block-by-block basis. Specifically, the maps of Youth (ages 0-17) and Seniors (ages 65 and Over) on page 26 along with the Population Density map on page 25 would look quite different for SoMa if the Planning Department used Census Block data instead of the Census Tract data which is very diluted by the massive amount of commercial zoned blocks, Transbay/former Freeways/empty lots, and other blocks included in the Census Tracts with zero residential uses.
- A map should be included for population density that includes the 31 construction projects already happening and the many more approved and awaiting start of construction in SoMa because your Housing Pipeline Document already has that information – it is useful for the public and elected leaders to see the map of what we KNOW is getting built and what will likely get built as far as the page 25 Population Density map is concerned.
- Page 9's "Existing Open Space" map of San Francisco paints everything green, including concrete plazas that are "Privately Owned Public Open Spaces" which get used for two things only: workers smoking cigarettes on break and workers socializing /eating. Technically, the public cannot use them on the weekends or at hours other than 8am until 5pm, Monday through Friday. I strongly recommend that a differentiating in the map color scheme is used to denote the POPOSeS – they are not anything near an equivalent to a grassy park/open space in general.
- I've pointed out the Planning Department the gross negligence of ignoring the 600+ kids who spend their summer weekdays in the downtown childcare and day camps at the multiple locations of Bright Horizons Childcare and Marin Day School along with the Embarcadero YMCA. These kids in the daycare centers near their parents' workplaces should be counted in the Page 26 map of Youth (ages 0-17) OR there should be an additional map that shows these populations on a block-by-block basis. To not include this information is misleading, discriminatory, and just plain lazy.
- Going back to the legend for the Page 26 map of Youth (ages 0-17), it stops at "greater than 7.24 youths (ages 0-17) per acre" when Supervisorial District 6 has many building complexes that should appear in a Census Block detailed map (the correct way to present this information for a mixed use area like the SoMa District),

and there should be additional ranges ... such as >7.24 and <=15, >15 and <=25, >25 and <=35, and so on.... You cannot have social equity and geographic equity in the ROSE if you do not use Census Block Data and you do not adjust your ranges to show the true density in population of people, kids, seniors in buildings that the Planning Department approved and knows contains over 1,000 residents in some cases (again, The Infinity complex with One Rincon Hill probably exceeding 1,000 residents once their second tower opens for use).

- I would suggest that there be some differentiation in the maps of existing open spaces that recognizes some parks are gated and only available at certain hours and on certain days of the week to nearby residents. I think of Boedekker Park in the Tenderloin where there were very tiny slivers of operational hours available to adults who don't have kids. It really isn't equitable to compare a park that is only open for public use 21 hours per week (or whatever) because it is gated and locked up most of the time to a park that is open, free of gates, and not a limited resource to the public.

I'm very disheartened by the dismissive decisions of the Planning Department to include public feedback to the June 2011 Draft ROSE in this November 2013 Draft ROSE. Please take the time to do the ROSE document the right way before finalizing it.

Finally, Harvey Rose, the Board's Budget Analyst, provided us with a table of park acreage per 1,000 residents on a District Supervisor basis back on June 5, 2013's Budget Committee meeting. That table appears on the fourth and final page of my letter.

Without providing Census Block data and showing the known population increases in the eastern neighborhoods from existing construction in progress and approved projects, the City is grossly negligent and ignoring the community health needs for public open space by residents in Supervisorial District 6 who have a fraction of park acreage compared to the rest (with the exception similarly dismal 0.43 acres per 1,000 residents in District 3 compared to our 0.17 acres per 1,000 residents) of the City.

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District	Park Acreage	Number of Residents	Acreage/1,000 Residents
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Total	4,944.8	805,235	6.14

Source: Calculated by the Budget and Legislative Analyst from data provided by the San Francisco Recreation and Parks Department.

Sincerely,

Jamie Whitaker

From: [Jamie Whitaker](#)
To: [Haddadan, Kimia](#)
Cc: [Kim, Jane](#); [Angulo, Sunny](#); [Veneracion, April](#); [Rahaim, John](#); planning@rodneyfong.com; cwu.planning@gmail.com; wordweaver21@aol.com; [Gwyneth Borden](#); richhillissf@yahoo.com; mooreurban@aol.com; hs.commish@yahoo.com; [Secretary, Commissions](#); [Commission, Recpark](#); matt@sfparksalliance.org; [Kris Schaeffer](#); [Jim Meko](#)
Subject: Here is some SoMa Census Block mapping for you ... Re: Comments on Draft Nov. 2013 ROSE
Date: Tuesday, January 14, 2014 11:36:12 PM
Attachments: [SoMa KidsUnder5_2010CensusData.pdf](#)

I have attached maps with Census Blocks to demonstrate to you all the TRUTHS that arise about children in South of Market under the age of 5 (not even up to 17 years old as the Draft ROSE contains) when Census Block data is used.

Please use Census Block data for the ROSE to capture the nuances of South of Market's residential population. The Census Tract Data is unfair, discriminatory, and flawed for use in the ROSE.

Thanks,
Jamie Whitaker

On Sun, Jan 12, 2014 at 11:34 PM, Jamie Whitaker <jami whitaker@gmail.com> wrote:

Jamie Whitaker
201 Harrison St. Apt. 229
San Francisco, CA 94105-2049

January 12, 2014

Kimia Haddadan
San Francisco Planning Department
1650 Mission St. 4th Floor
San Francisco, CA 94103

cc: Supervisor Jane Kim

cc: Sunny Angulo

cc: Planning Commissioners

cc: John Rahaim

Subject: Comments on November 2013 Recreation & Open Space Element

Dear Ms. Haddadan,

I have reviewed the November 2013 Final Updated Draft of the Recreation and Open Space Element, and I am very disappointed to see that my feedback to the Planning Department in early 2013 regarding the irrational and flawed use of Census data on a Census Tract basis instead of a more nuanced and informative Census Block basis (important for mixed use neighborhoods like SoMa) has been ignored. This amounts to gross negligence on the part of the San Francisco Planning Department as far as I am concerned.

What I consider just plain negligence by the Planning Department was exhibited in the June 2011 Draft ROSE, and that negligent and flawed usage of Census Tract data is the primary reason why South of Market got stiffed and zero money (until our Supervisor fought to get \$1 million out of the \$195 million) on the 2012 Parks Bond. When you know that District 6 has the least amount of open space per 1,000 residents at 0.17 acres, it is incredibly infuriating to residents to see the Planning Department continue to use Census Tract data in the ROSE instead of Census Block data for our mixed use SoMa District.

It is inexcusable, in my opinion, to not correct the Census Data shown in our mixed use South of Market District in the ROSE so that it shows nuances on a Census Block basis where there are **over 80 children living in a single condo complex (The Infinity** at Main and Folsom Streets in Rincon Hill) – instead of the Census Tract data that shows “less than 2.49 Youth (age 0-17) per acre.”

The Census Block data has been readily available so that you can set age groupings based on the full 2010 Census data since at least 2012. There is no excuse, other than gross negligence, for leaving the nuanced data on a Census Block basis out of the final edition of the ROSE and retaining the faulty (as I pointed out a year ago) Census Tract data.

I am writing to ask that the Planning Department recognize the Department's gross negligence, recognize the potential harm to the health of residents of SoMa if left uncorrected in the ROSE, and do whatever is necessary to make the

following corrections that I am now requesting a second time one year after the first requests as they related to the June 2011 Draft of the ROSE.

Please seriously consider these corrections so that South of Market, despite its mixed use zoning, is treated by the City and its Recreation and Parks Department in a geographically equitable manner to the traditional mostly-residential neighborhoods in San Francisco:

- Census Tract data for South of Market needs to be replaced by Census Block data to show the nuances on a Census block-by-block basis. Specifically, the maps of Youth (ages 0-17) and Seniors (ages 65 and Over) on page 26 along with the Population Density map on page 25 would look quite different for SoMa if the Planning Department used Census Block data instead of the Census Tract data which is very diluted by the massive amount of commercial zoned blocks, Transbay/former Freeways/empty lots, and other blocks included in the Census Tracts with zero residential uses.
- A map should be included for population density that includes the 31 construction projects already happening and the many more approved and awaiting start of construction in SoMa because your Housing Pipeline Document already has that information – it is useful for the public and elected leaders to see the map of what we KNOW is getting built and what will likely get built as far as the page 25 Population Density map is concerned.
- Page 9's "Existing Open Space" map of San Francisco paints everything green, including concrete plazas that are "Privately Owned Public Open Spaces" which get used for two things only: workers smoking cigarettes on break and workers socializing /eating. Technically, the public cannot use them on the weekends or at hours other than 8am until 5pm, Monday through Friday. I strongly recommend that a differentiating in the map color scheme is used to denote the POPOSES – they are not anything near an equivalent to a grassy park/open space in general.
- I've pointed out the Planning Department the gross negligence of ignoring the 600+ kids who spend their summer weekdays in the downtown childcare and day camps at the multiple locations of Bright Horizons Childcare and Marin Day School along with the Embarcadero YMCA. These kids in the daycare centers near their parents' workplaces should be counted in the Page 26 map of Youth (ages 0-17) OR there should be an additional map that shows these populations on a block-by-block basis. To not include this information is misleading, discriminatory, and just plain lazy.
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Source: Calculated by the Budget and Legislative Analyst from data provided by the San Francisco Recreation and Parks Department.

Sincerely,

Jamie Whitaker

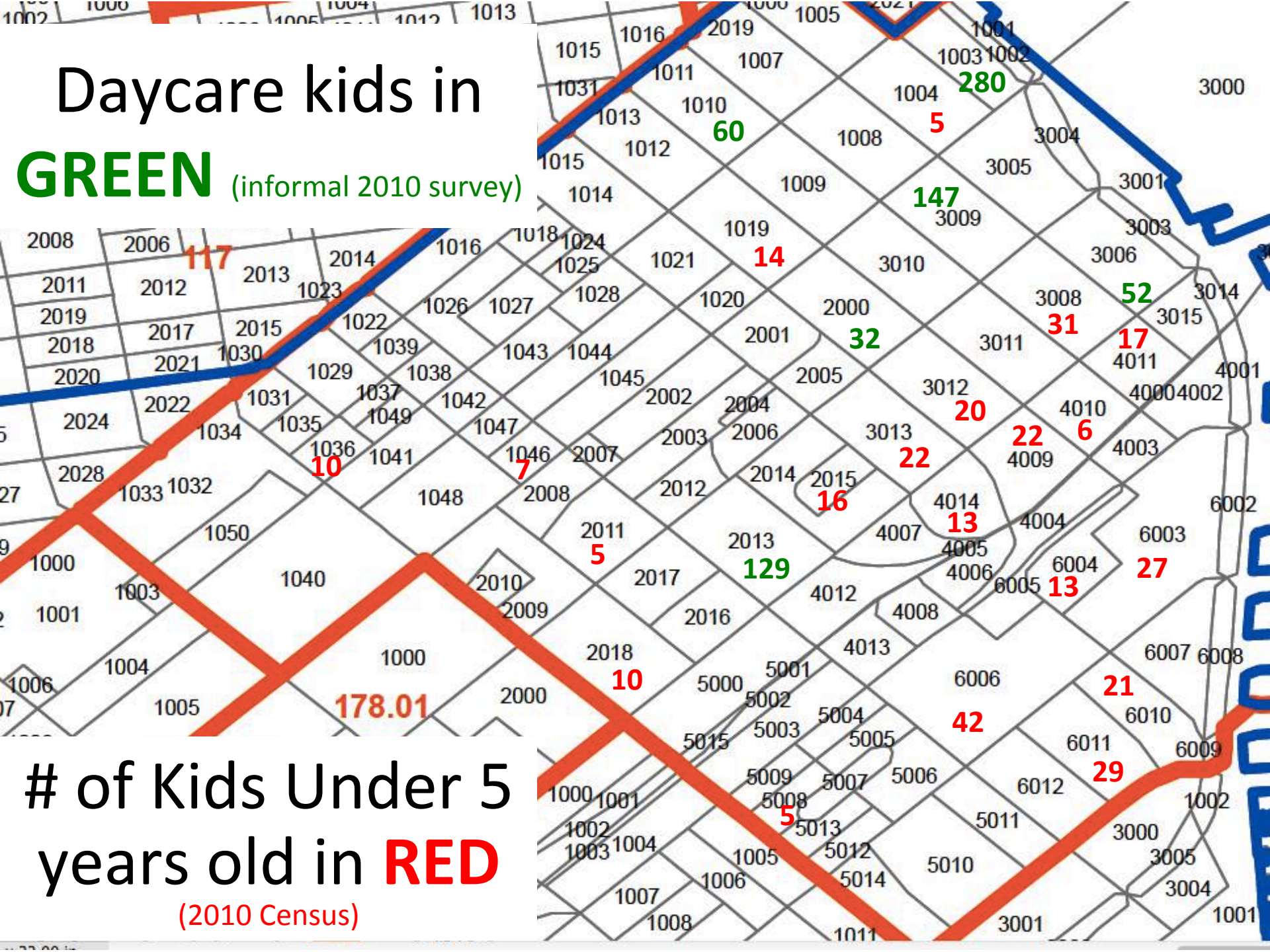
Playgrounds

0.25 MILE BUFFER



Daycare kids in

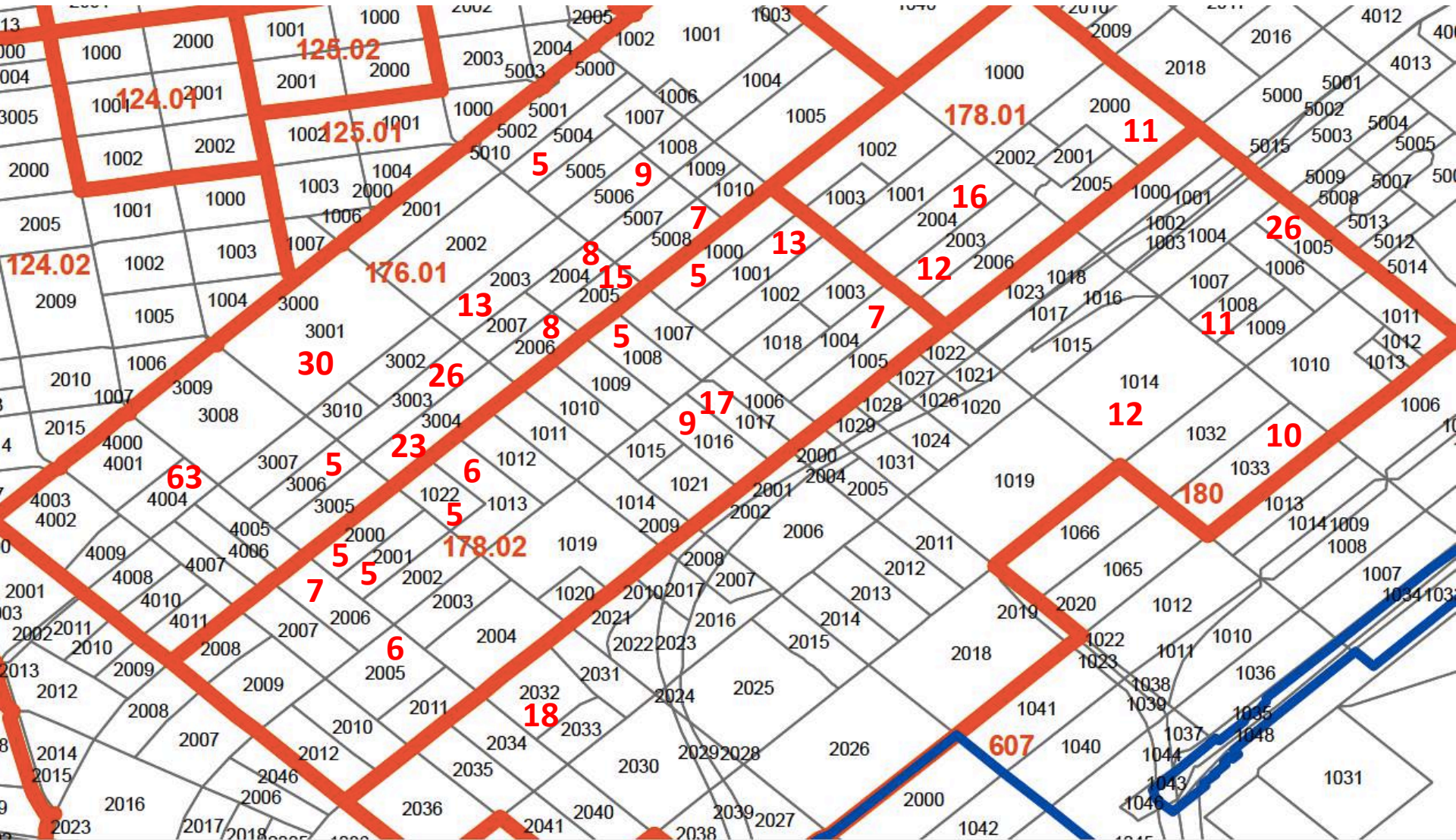
GREEN (informal 2010 survey)



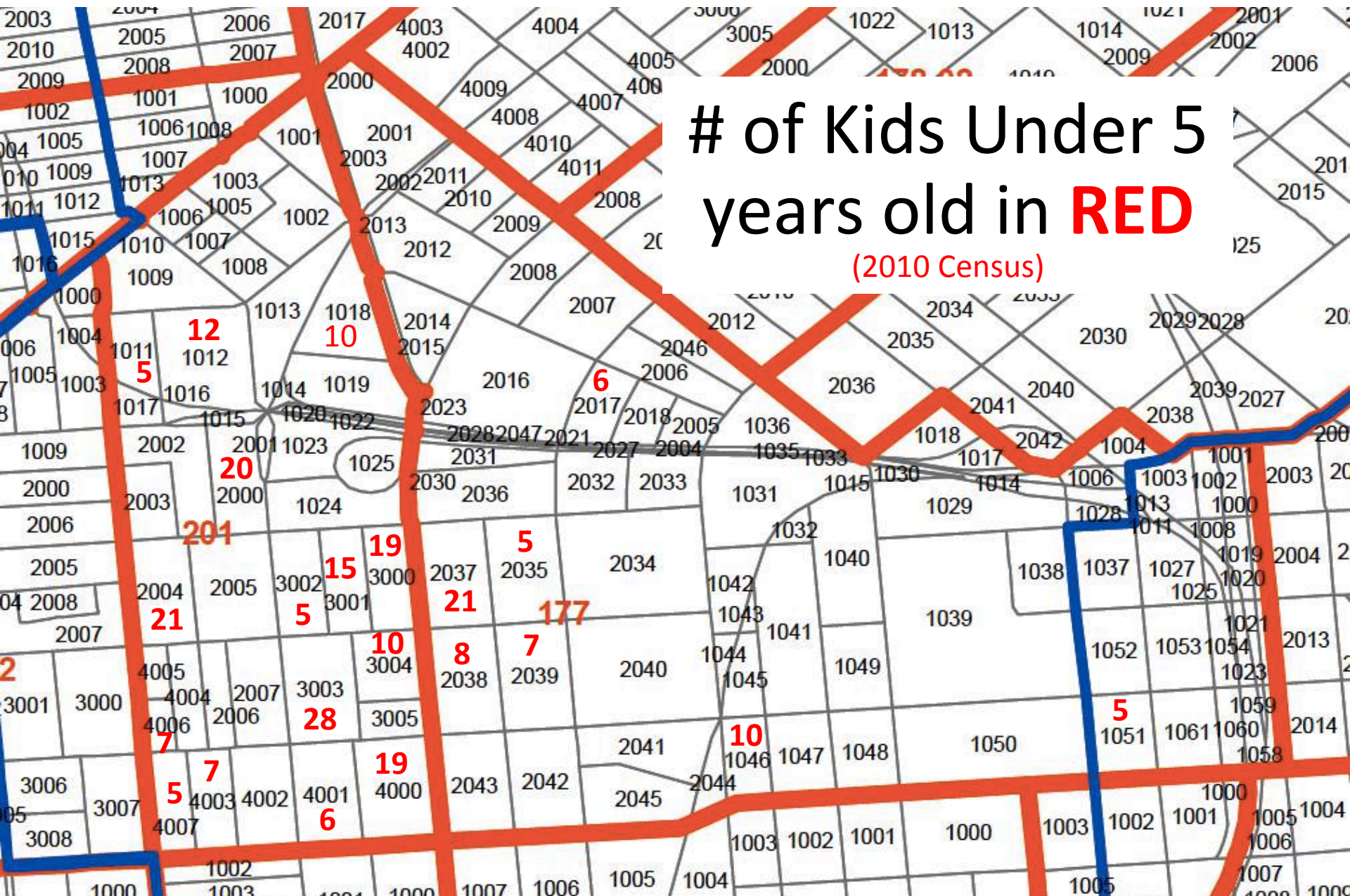
of Kids Under 5
years old in **RED**
(2010 Census)

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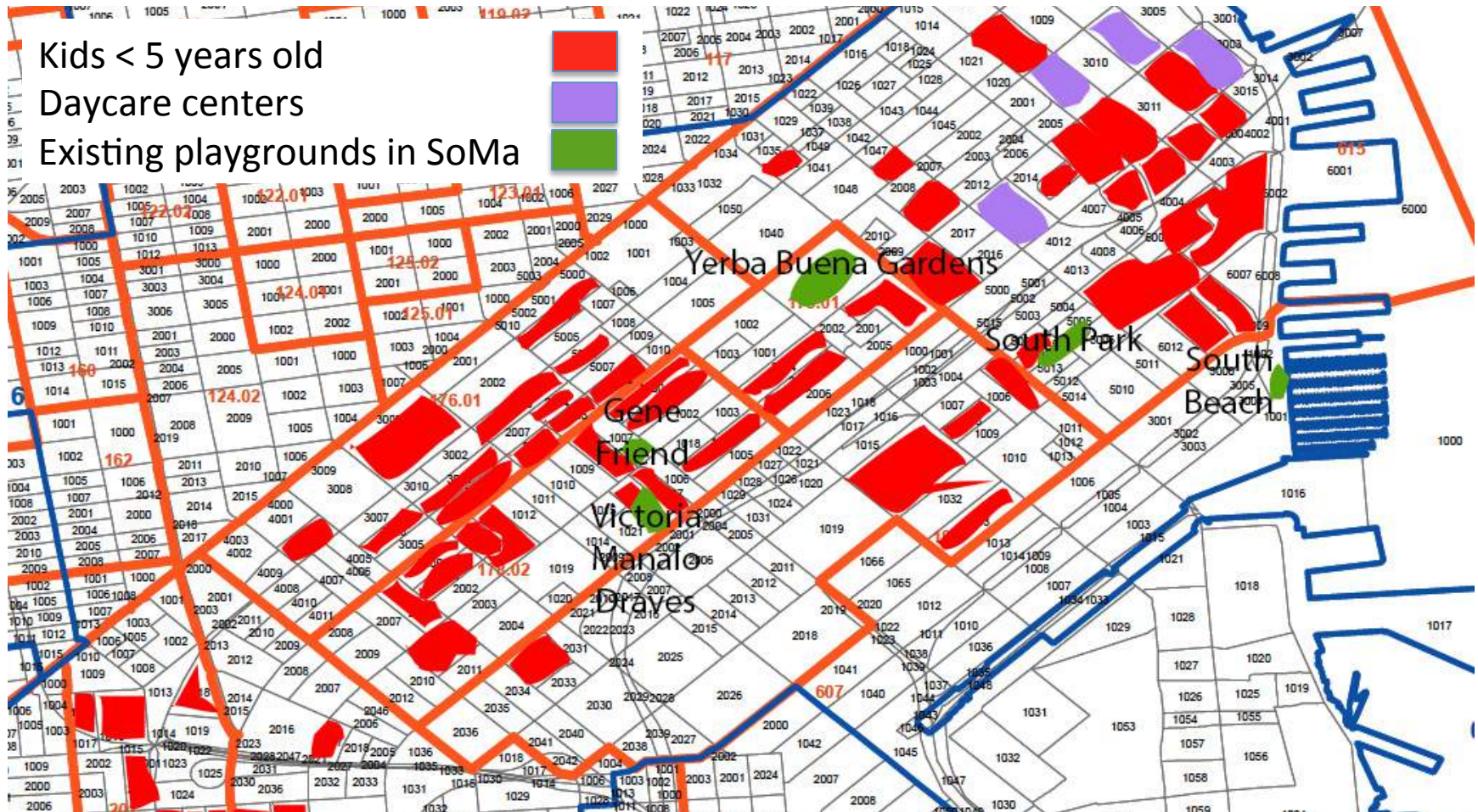
(2010 Census)



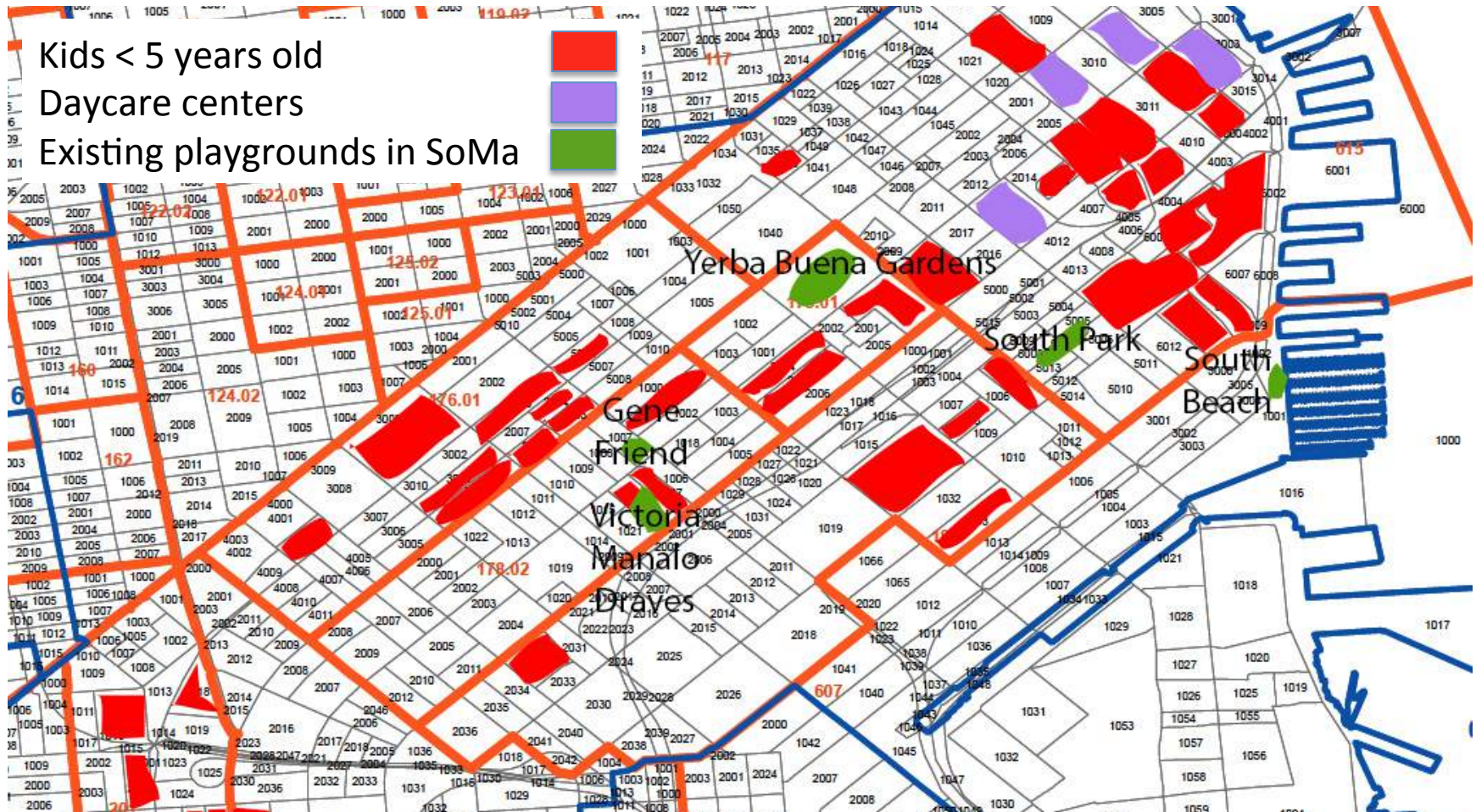
of Kids Under 5 years old in **RED** (2010 Census)



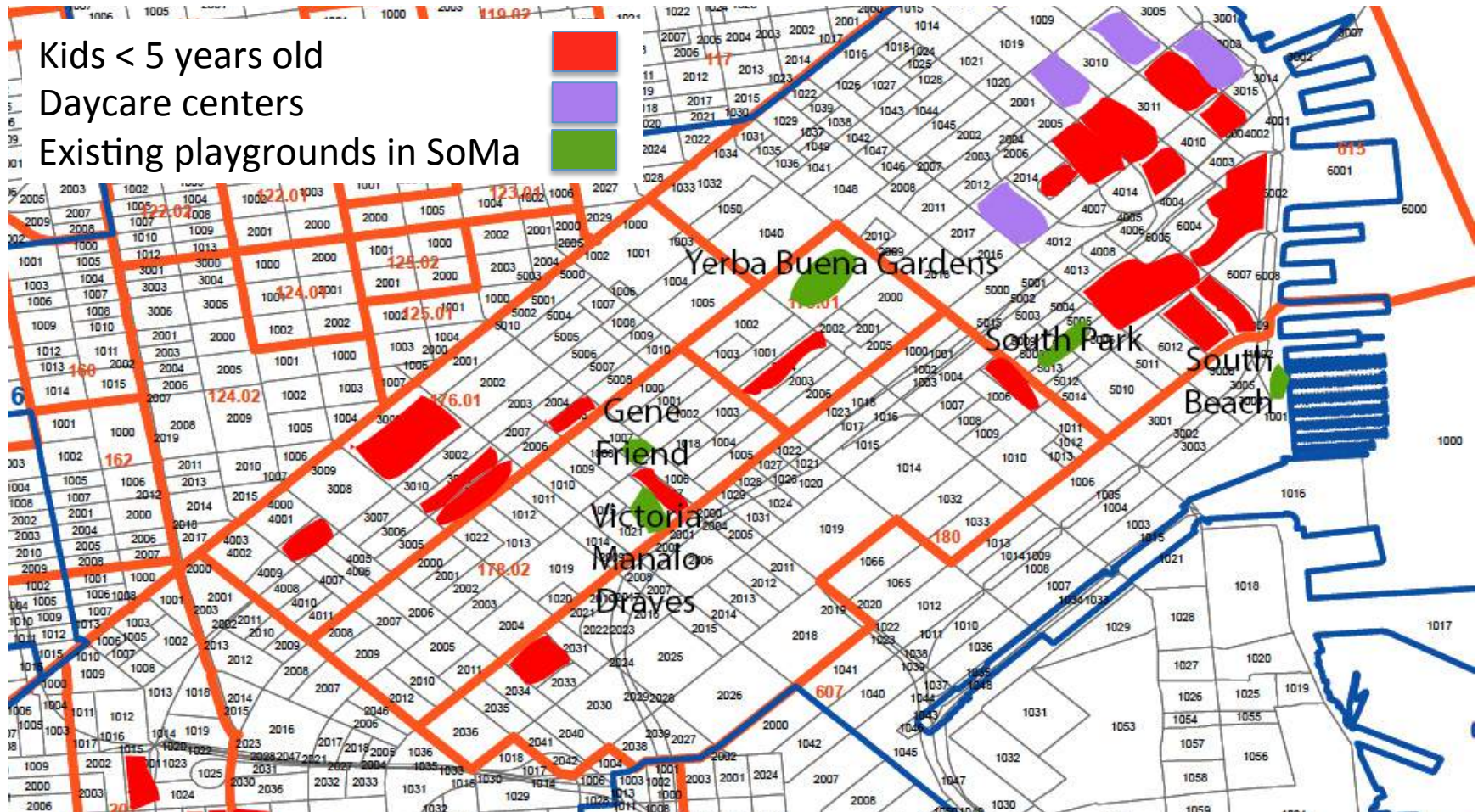
SoMa's Blocks with 5 or more kids per census block under age 5



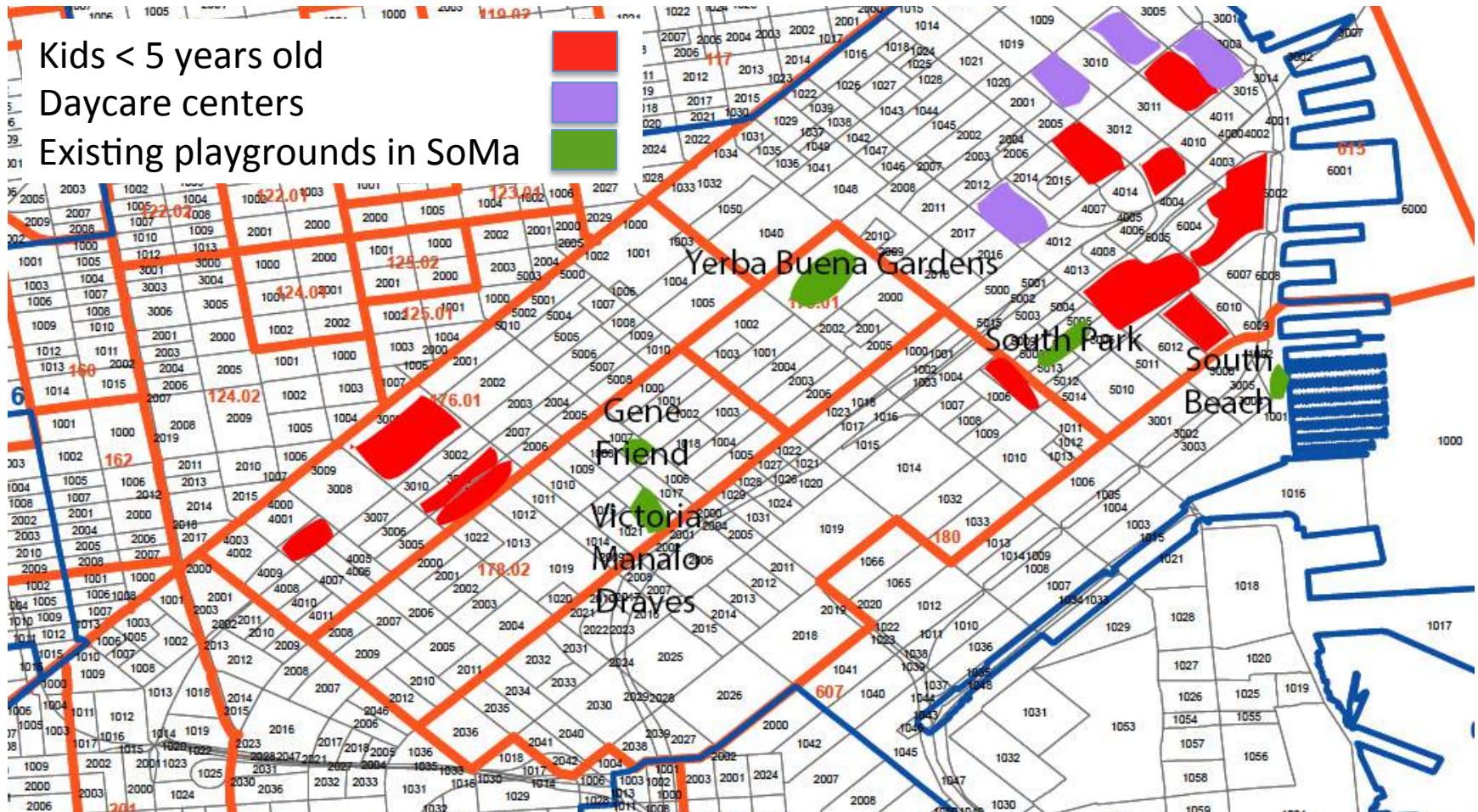
SoMa's Blocks with 8 or more kids per census block under age 5



SoMa's Blocks with 15 or more kids per census block under age 5



SoMa's Blocks with 22 or more kids per census block under age 5



Harvey Rose's Shocking Open Space Inequity Table (6/5/13 Budget Comm)

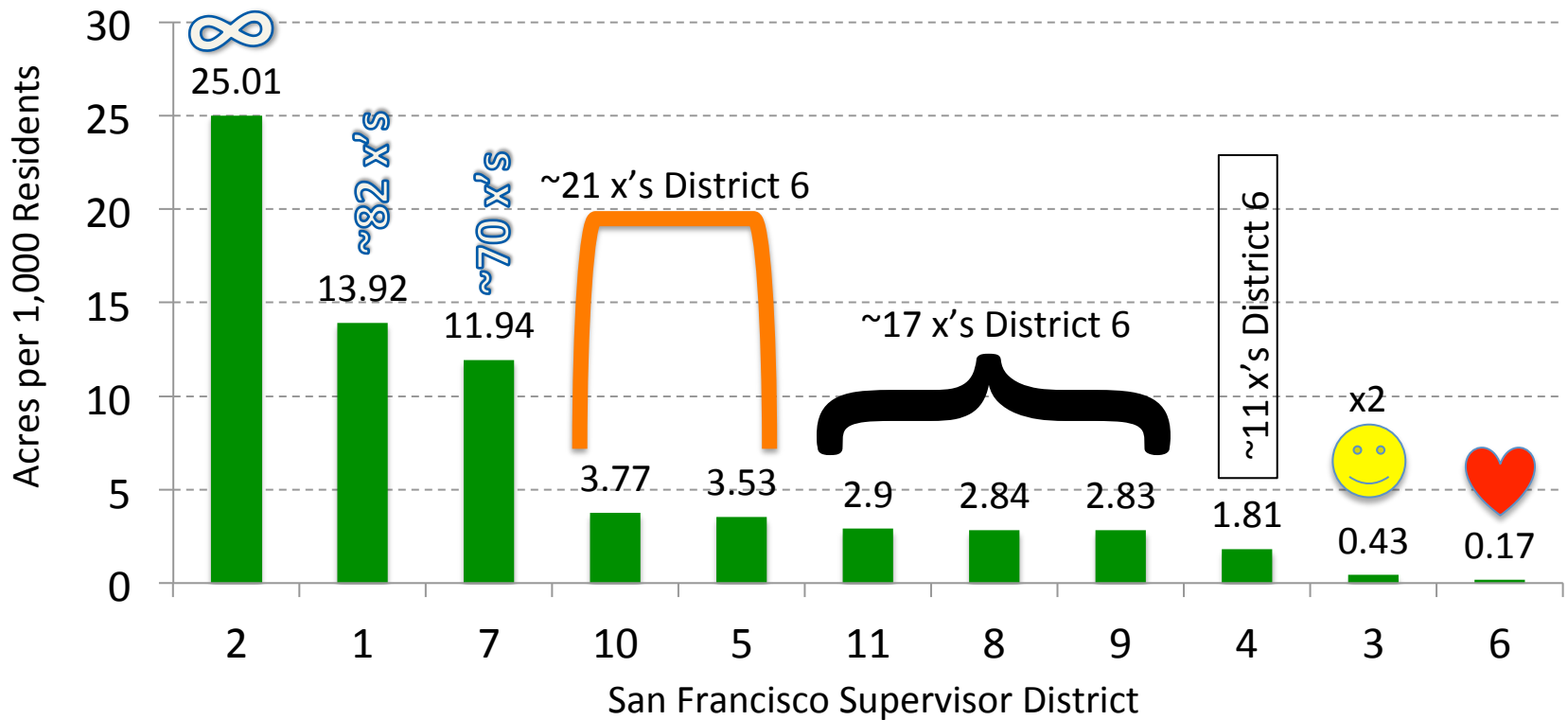
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District 6 Needs about 200 Acres of New Parks to be Equitably Resourced

Park Acreage per 1,000 Residents by San Francisco Supervisor District



Jan Blum – January 24, 2014

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have reviewed your comments in their entirety. Below you can find how your comments have contributed to improve the ROSE as well as the Department's responses to your comments and questions.

All comments the Department has received have been broken down by themes as described in the Memo to the Planning Commission, dated March 13, 2014. In **bold** below are these themes, followed by the highlights of your comments under that theme *in italics*. Finally the Department response is listed for each theme of your comments.

Preservation of Open space

Comment highlights

- *Preservation: New buildings remove scarce public open space and should not be allowed. Taxpayers are entitled to vote on whether or not a new building is what they want. Please remove references to using land for built cultural institutions or other built edifices.*

Department Response

We have made some modifications to the language in Policy 1.3 to clarify the meaning of recreational and cultural buildings. We have received a variety of comments on this policy that would call for a balance between conflicting needs. We have received many comments asking for additional focus on recreation and improving and adding to our existing pool of recreational facilities.

Building new recreational facilities solely through acquisition of additional land is infeasible due to high costs and the scarcity of available land in the City. Therefore, this policy calls for a balanced approach to provide more recreational and cultural facilities through an efficient use of underutilized space within our existing open spaces. This policy provides specific guidelines if new or expanded facilities are proposed and calls for replacement of open space if lost within this process.

Recreation (and open space)

Comment highlights

- *Should set (or continue) an acreage goal for parks (as is currently in the 1986 ROSE)*

Department Response

The reason that the 2013 ROSE does not have a quantitative metric for open space (such as acreage) is that the current standard widely available is a national standard which is not applicable to a dense City such as San Francisco. San Francisco, similar to other dense cities in the nation, maintains a skewed rate of open space per person compared to the standard averages provided by national recreation and parks organizations.

Recognizing this challenge, the ROSE uses a different methodology to evaluate the need for open space and recreation. The high needs area analysis incorporates a walkability analysis which identifies areas in the City that are not located within a walking distance to playgrounds, rec centers, and passive recreation areas. The Department believes that this access analysis better suits the urban character of San Francisco compared to a standard and universal metric that is created for use of by suburban and rural jurisdictions.

“Activation” of our parks

- *Draft ROSE emphasizes "city experience" over enjoyment of parkland for its own sake, emphasizing 'activation' and 'underutilized' excessively.*
- *The frequent use of such words as "activation," and "underutilized," point to an emphasis on our parks becoming another busy, urban experience. More buildings, more crowds, more planned events, more organized activities, and more commercialization.*
- *Needs language that emphasizes passive, contemplative use of parks and open spaces.*
- *Many of our parks just need better maintenance*

Department Response

The role of parks and open spaces as places for restorative, passive contemplation is critical, and can provide many benefits, as cited in the Introduction of the ROSE. The ROSE discusses the need for use of park for relaxation, and passive recreation activities throughout the document. We have modified the definition of recreation to distinguish between active and passive recreation; and added a reference to both active and passive enjoyment of parks in Policy 1.1. The need for activation of our open spaces was heard consistently throughout our outreach process to better utilize the resources we have, especially the ones that are underutilized. As laid out in Policy 1.1, better utilizing our parks means encouraging a wide variety of uses for all tastes and needs, including both active and passive recreation as well as tranquil spaces.

We have amended Policy 1.4 to place further emphasis on the need for maintenance, adding language that the City should continue to employ well trained staff, such as gardeners and arborists and other tradespeople, and should seek alternative maintenance strategies to ensure better maintenance of parks and recreational facilities.

Golden Gate Park Master Plan

Comment highlights

- *The GGPMP should not be opened to changes that undermine the plan. Please modify language to stress the importance of preserving the landscape as described in Obj. II, Policy A of the GGPMP. ROSE should protect against piecemeal revisions to GGPMP.*

Department Response

The Golden Gate Park Master Plan is the result of an extensive city and community collaboration. The result is a very beloved Master Plan for one of the city’s most beloved open spaces. The ROSE in no way suggests that any process to review the Golden Gate Park Master Plan should be done unilaterally by the city. However, the

ROSE is a 20 year document and the current Golden Gate Master Plan is now a 16 year old document. Life of policy documents usually span from 20 to 25 years. This ROSE policy calls for improvements to GGP and, per your suggestion, the language has been modified to make it clear that any potential changes to the Master Plan should happen with community collaboration.

Other Comments (Environmental Education)

Comment highlights

- *Include language on an enhanced educational program instead; one that teaches the value of a biodiverse parkland, the values of being in nature, the outdoor opportunities to improve personal health and well being that exercise in a park can bring.*

Department Response

We have added language to Policy 5.2 (Increase awareness of the City's open space system) to emphasize ecoliteracy and education.

From: [jan blum](#)
To: [Haddadan, Kimia](#)
Subject: Draft ROSE comments
Date: Friday, January 24, 2014 3:59:31 PM

Dear Ms. Haddadan;
Thank you for the opportunity to comment on the DRAFT ROSE.

I have, under separate cover, requested an extension of the deadline for commenting on the Draft ROSE by 30 days so that the Historic Preservation Commission has an opportunity to review and comment appropriately on this very important and critical document. I restate that request herewith.

Below are comments which i wish placed in the record:

- New buildings are unsuitable in parks as they remove very scarce public open space in the landscape from free, public access. Taxpayers support open space parks through taxation. Should new buildings be proposed for a park by the City, the taxpayers who own the property are entitled to vote on whether or not a new building in a park is what they want. Please remove the verbiage about using park land for built cultural institutions or other built edifices from the ROSE.
- The current standard for open space in San Francisco is 5.5 acres per thousand. Do not remove or lower the acres per thousand that is currently on the books. As San Francisco grows, we will need to find more ways to create legitimate open space not reduce it.
- The R.O.S.E. "Emphasizes the "city" experience over enjoyment of parkland for its own sake: The frequent use of such words as "activation," and "underutilized," point to an emphasis on our parks becoming another busy, urban experience -- more buildings, more crowds, more planned events, more organized activities, and more commercialization. Many of our parks just need better maintenance Please eliminate the focus on entertainment and activating our parks and substitute an enhanced educational program instead; one that teaches the value of a biodiverse parkland, the values of being in nature, the outdoor opportunities to improve personal health and well being that exercise in a park can bring.
- The document should develop language that gives greater standing to the passive, contemplative use of parks and preserves them from noise, unnecessary lights and "programming".
- The ROSE should continue to emphasize the importance of preserving Golden Gate Park as a landscape park, as outlined in the Golden Gate Park Master Plan (Objective II, Policy A.
- The ROSE should be revised to protect the GGP Master Plan from piecemeal revisions.

Thank you.

Jan Blum
2160 Leavenworth, Apt. 201
San Francisco, Ca 94133

Jennifer Clary, San Francisco Tomorrow – February 12, 2014

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have reviewed your comments in their entirety. Below you can find how your comments have contributed to improve the ROSE as well as the Department's responses to your concerns and questions.

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Preservation of open space

Comment highlights

- *New buildings are unsuitable in parks. Cultural buildings belong in the heart of the built-up parts of cities where access is greatest. Parkland needs to be preserved and new buildings should not be allowed, as is currently the case in the 1986 ROSE.*

Department Response

We have made some modification to the language in Policy 1.3 to clarify the meaning of recreational and cultural buildings.

We have received a variety of comments on this policy that would call for a balance between conflicting needs. We have received many comments asking for additional focus on recreation and improving and adding to our existing pool of recreational facilities.

Building new recreational facilities solely through acquisition of additional land is infeasible due to high costs and the scarcity of available land in the City. Therefore, this policy calls for a balanced approach to provide more recreational and cultural facilities through an efficient use of underutilized space within our existing open spaces. This policy provides guidelines to ensure minimum loss of existing open space, and calls for replacement of open space when and if lost within this process.

Commercialization of Parks / Park Funding

Comment highlights

- *The frequent use of such words as "activation," and "underutilized," point to an emphasis on our parks becoming another busy, urban experience. Large events often cause sites to be shut down for periods before and after event, excluding the public. Large events should only be permitted if they complement the purpose of parks and discourage events longer than one day.*
- *Temporary structures and fencing should be minimized and "temporary" should be defined. Miles of temporary fencing and temporary structures seem permanent because they prevent public access for months and even years.*

- *Policies that encourage more crowds, more planned events, more organized activities and more commercialization should not be part of the Element. Language such as “site specific revenue generation” is a promotion of park as a consumer-oriented experience. Vendors are not “partners.”*
- *Language should give greater standing to the passive, contemplative use of parks and preserve them from noise, unnecessary lights and ‘programming’*
- *Funding for parks should and can be provided by the general fund of the City even though parks have relied on outside earnings in recent years. Current budget stringency is temporary. Difficulty is that RPD budgeting is not transparent and funds are difficult to track. Document should not make parks so heavily dependent on other sources of money and so many outside events.*

Department Response

Policy 1.1 has been modified to discuss large events in parks, acknowledging the fact that the draw of these events sometimes provides the first exposure to the City's open space resources. This policy also calls for evaluating the impacts of these events on open spaces and their surrounding neighborhoods.

Thank you for also sharing your concerns related to temporary buildings and structures. Policy 1.3 acknowledges that such structures are sometimes necessary for public safety or other important purposes. However, to the extent that such structures are used beyond their intended public purpose, they would be subject to the same criteria outlined earlier in the policy, which include guidelines to minimize their size and impact on parks.

The role of parks and open spaces as places for restorative, passive contemplation is critical, and can provide many benefits, as cited in the Introduction of the ROSE. The ROSE discusses the need for use of park for relaxation, and passive recreation activities throughout the document. We have modified the definition of recreation to distinguish between active and passive recreation; and added a reference to both active and passive enjoyment of parks in Policy 1.1. The need for activation of our open spaces was heard consistently throughout our outreach process to better utilize the resources we have, especially the ones that are underutilized. As laid out in Policy 1.1, better utilizing our parks means encouraging a wide variety of uses for all tastes and needs, including both active and passive recreation as well as tranquil spaces.

The challenge around funding parks has been recognized as a major concern within the past decade, as parks have been receiving less and less support from the City's General Fund. The intention of Objective 6 of this policy document is to address this funding challenge without compromising our parks and recreation as public resources. The language of Policy 6.1 has been updated to further emphasize that the City has a primary responsibility to fund adequate, well-maintained parks and recreational facilities. That said, the policy acknowledges that needs are so great that costs will inevitably outpace available funds, and provides a list of potential supplemental sources of funding that could be explored to help increase funds and the City's capacity to provide a high quality open space and recreational system. These funding options are not intended to replace the City's obligation to fund the park system, and the policy calls for the City to evaluate these options to assess which are an appropriate fit.

We have also added language in Policy 6.1 that emphasizes the need for transparency and accountability when pursuing public-private partnerships. Lastly, we have applied modifications to the text to remove the impression of vendors as partners in parks.

Biodiversity & natural areas management

Comment highlights

- *Safety in parks means eliminating dangerous or toxic materials, especially artificial materials that break down over time and create chemical dead zones.*
- *Do not allow “other uses” in natural areas. They are precious areas and should not be threatened by the addition of uses other than walking, education, wildlife observation, personal reflection and nature study. Many are steep, erosive, fragile areas that cannot withstand frequent use.*

Department Response

We have added an additional Policy 4.4 that encourages and defines environmental sustainability (“Include environmentally sustainable design practices in construction, renovation, management and maintenance of open space and recreation facilities”). This policy states that the City should continue to follow the Integrated Pest Management (IPM) ordinance to ensure sustainable pest management practices and use of pesticides. In addition, Policy 4.3 calls for the City to utilize green building practices and local materials and services.

With regards to your comments on allowing other uses within natural areas, in Policy 4.2 we have provided a balanced discussion, including several decision-making criteria, for how the City may balance the need to protect invaluable natural resources in areas that are not owned by RPD in the context of competing needs for land (see for details). Additionally, RPD’s SNRAMP program addresses areas already designated as “natural areas.”

Golden Gate Park Master Plan

Comment highlights

- *GGPMP adopted recently and does not need revision. Part of the ROSE and should have force of any other elements of the General Plan. Remove statements about needing to update GGPMP.*

Department Response

The Golden Gate Park Master Plan is the result of an extensive city and community collaboration. The result is a very beloved Master Plan for one of the city’s most beloved open spaces. The ROSE in no way suggests that any process to review the Golden Gate Park Master Plan should be done unilaterally by the city or should necessarily even be done. However, the ROSE is a 20 year document and the current Golden Gate Master Plan is now a 16 year old document. Life of policy documents usually span from 20 to 25 years. This ROSE policy calls for improvements to GGP and, per your suggestion, the language has been modified to make it clear that any potential changes to the Master Plan should happen with community collaboration.

Park standards

Comment highlights

- *Keep the 5.5 acres per thousand population ratio in the 1986 ROSE. Increases in population point to the need for more parkland, not less.*

Department Response

The reason that the 2013 ROSE does not have a quantitative metric for open space (such as acreage) is that the current standard widely available is a national standard which is not applicable to a dense City such as San Francisco. San Francisco, similar to other dense cities in the nation, maintains a skewed rate of open space per person compared to the standard averages provided by national recreation and parks organizations.

Recognizing this challenge, the ROSE uses a different methodology to evaluate the need for open space and recreation. The high needs area analysis incorporates a walkability analysis which identifies areas in the City that are not located within a walking distance to playgrounds, rec centers, and passive recreation areas. The Department believes that this access analysis better suits the urban character of San Francisco compared to a standard and universal metric that is created for use of by suburban and rural jurisdictions.

Other comments (maintenance)

Comment highlights

- *Maintenance: Parks need better maintenance, and should have trained labor. ROSE should include language that requires/promotes employing well-trained staff, esp. gardeners/arborists.*

Department Response

We have amended Policy 1.4 to place further emphasis on the need for maintenance, adding language that the City should continue to employ well trained staff, such as gardeners and arborists and other trades people, and should seek alternative maintenance strategies to ensure better maintenance of parks and recreational facilities.



February 12, 2014

Re: 2013 Revised Draft R.O.S.E.

Dear Planning Department Staff and Planning Commission

Attention: Kamia Haddadan, Planner

This revised draft document is an improvement over the 2011 version but there are still points to be addressed in the final draft:

New buildings. There is no reason why the ROSE should leave open the door to new buildings in parks. Cultural buildings and museums belong in the heart of the built-up parts of the city where they are easily reached by public transportation. The new deYoung Museum draws so many people to Golden Gate Park that the Concourse garage is regularly “Full” as are the streets in the park AND the Ninth and 19th Avenue entrances are gridlocked on a weekend as well. The greatest Park in the region can scarcely be used as a park on weekends anymore. The 1986 R.O.S.E. said that there was no justification for building new buildings in parks and that prohibition should remain in the new ROSE.

Natural Areas. Do not allow “other uses” in Natural Areas. The Natural Areas Management plan shows how to secure retention of the natural character of these remnants of our land’s biological history and heritage. They are precious areas that should not be threatened by the addition of uses other than walking, education, wildlife observation, personal reflection and nature study. Most of these areas are very steep and erosive and cannot stand up to overuse and indiscriminate trampling as is currently the problem in the Oak Woodlands.

Events that are “activating”. Please note that large-scale events may lead to more attendance to a “park partner” event, but often the site is shut down (the opposite of “activated”) for periods before and after the event during which the public is excluded entirely and fenced off from major areas. Events in the parks should be permitted only if they complement the basic purpose of parks and discouraged if they are scheduled for a period longer than one day.

Temporary fencing and temporary structures. There are temporary structures and miles of temporary fencing that seem permanent because the public is excluded from areas needlessly for months and even years. While temporary structures may sometimes be necessary, the R.O.S.E. document should define what time length is “temporary”. Installations of chain-link fencing should be minimized in area and “temporary” fencing should be limited as to duration.

Park and open space ratio. Do not abandon the ratio of 5.5 acres per thousand population. Standards in the Code requiring a ratio of parkland per thousand people should be retained and not removed from the Element or the Code. The increase in population we are seeing points to the need for more parkland, not less.

Commercialization and threat of privatization. Policies that encourage more crowds, more planned events, more organized activities and more commercialization should not be set into the permanent language of the Element, just as they should not be a part of the language of the Code. Language such as "site specific revenue generation," is a promotion of parks as a consumer-oriented experience and buys in to the notion that parks cannot be enjoyed without extensive commercial amenities. Vendors are not "partners". They make profits for themselves, they are not community serving and they should not receive choice locations in parks.

Simply, nature. Simple nature appreciation is not a waste of space. The document should develop language that gives greater standing to the passive, contemplative use of parks and preserves them from noise, unnecessary lights and "programming".

Safe lighting. Safety in parks and recreation areas means the right levels of lighting, not excessive lighting or lighting that is on automatically and shines even when there is no game or evening usage of an area to that effect. There is no language in ROSE that addresses this.

Safe non-toxic materials. Safety in parks means eliminating dangerous or toxic materials, especially those artificial materials that break down over time and create chemical dead zones which are dangerous to humans and wildlife. ROSE should include wording that accomplishes this.

The Golden Gate Park Master Plan. Please remove any suggestion or statement about the GGPMP needing revisions because it is no longer considered relevant. The GGPMP was adopted fairly recently in 1998 and does not need revision. It was worked out by citizens who reached agreement on its language after years of working with RPD staff.

The General Fund. Funding for the parks should and can be provided by the general fund of the City even though in recent years, it has appeared that the parks must rely on outside earnings. The current City budget stringency is temporary. The difficulty is that RPD is not transparent and money, including bond money, is impossible for the public to track. The document should not suggest policy for our parks that make them so heavily dependent on other sources of money and so many outside events.

The R.O.S.E. is a long-range generalized document which should not be entangled in monetary issues regarding the RPD annual budget.

Improved maintenance. The ROSE should have something to say about the parks' need for better maintenance. There should be language which promotes a priority for good maintenance by the employment of capable and well-trained staff, especially professional gardeners and arborists.

We appreciate that staff listened to critics and improved the draft document of a few years ago. It is important to state that many urged the staff to return to the 1986 ROSE for the basic Goals Principles and

Policies, because it expresses quite perfectly the true needs and purposes of our parks and recreation facilities.

Sincerely,

Jennifer Clary

President, San Francisco Tomorrow

Kristina Hansen – January 21, 2014

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have reviewed your comments in their entirety. Below you can find how your comments have contributed to improve the ROSE as well as the Department's responses to your comments and questions.

All comments the Department has received have been broken down by themes as described in the Memo to the Planning Commission, dated March 13, 2014. In **bold** below are these themes, followed by the highlights of your comments under that theme *in italics*. Finally the Department response is listed for each theme of your comments.

Recreation

Comment highlights

- *Standards: SF far below national standards in recreation facilities such as soccer fields and tennis courts. ROSE should require more facilities and preserve existing ones.*
- *Need to focus more on recreation responding to the massive construction in San Francisco*

Department Response

We have incorporated language about the need to assess recreation, which is currently a requirement of the City charter. The high needs area analysis incorporates a walkability analysis which identifies areas in the City that are not located within a walking distance to playgrounds, rec centers, and other active and passive recreation areas. The Department believes that this access analysis better suits the urban character of San Francisco compared to a standard and universal metric that is created for use by suburban and rural jurisdictions.

We have added additional references to recreation throughout the document specifically in Policies 1.3-1.4 and Objectives 2 and 6.

From: kristina.hansen
To: planning@rodnevfong.com; cwu@chinatowncdc.org; wordweaver21@aol.com; planfsf@gmail.com; richhillssf@yahoo.com; hs.commiss@yahoo.com; [Rahaim, John](#); [Exline, Susan](#); [Haddadan, Kimia](#); commissionsecretary@sfgov.org
Subject: Protect Recreation
Date: Tuesday, January 21, 2014 3:54:15 PM

Dear Commissioner:

The ROSE needs to look to the future of San Francisco -- build more recreation and protect the ones it does have. There is massive construction around San Francisco and yet no focus on recreation.

San Francisco is far below national standards in recreation facilities such as tennis courts, swimming pools, bowling alleys. Recreational facilities remain under siege and the trend will not turn around without vigorous programs to protect and maintain recreation. San Francisco needs to build new facilities to match the increased population growth. In the same way that San Francisco must plan for infrastructure for the new population -- recreation must be considered a part of that infrastructure planning.

Given the drastic shortfall of recreation in San Francisco , we recommend that recreation be added to these sections of the ROSE:

Policy 1.3. Preserve existing **recreation** and open space by restricting its conversation to other uses and limiting encroachment from other uses, assuring no loss of quantity or quality of **recreation** and open space.

Policy 1.4. Maintain and repair **recreation** and open spaces to modern maintenance standards.

Objective 2: Increase **recreation** open space to meet the long-term of the City and Bay Region.

Objective 6 to that it reads: "Secure long-term resources and management for **recreation**, open space acquisition, operations and maintenance."

Best,

Kristina Hansen

Liam O'Brien – January 30, 2014

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have reviewed your comments in their entirety. Below you can find how your comments have contributed to improve the ROSE as well as the Department's responses to your comments and questions.

All comments the Department has received have been broken down by themes as described in the Memo to the Planning Commission, dated March 13, 2014. In **bold** below are these themes, followed by the highlights of your comments under that theme *in italics*. Finally the Department response is listed for each theme of your comments.

Biodiversity & natural areas management

Comment highlights

- *Lepidopterist with a decade of experience preserving SF butterfly species. Would not be possible without remaining Natural Areas. ROSE goes a long way in protecting these areas and should be adopted.*

Department Response

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have taken note of your comments in support of preserving natural areas in the City, and appreciate you sharing about your experiences and hard work to protect local butterflies.

From: [Liam O'Brien](#)
To: [Haddadan, Kimia](#)
Subject: Support of Rose
Date: Thursday, January 30, 2014 10:22:19 AM

My name is Liam O'Brien. I've done a great deal of work over the last decade to support the continuation of butterfly species for future generations of San Franciscan. None of this would be possible without the remaining Natural Areas - the small remnants of San Franciscan's biodiverse past. Though many of our butterflies have added street weeds to their palette of host plants, it is the ones that haven't (Green Hairstreaks, Mission Blues, Woodland Skippers and California Ringlets) that we need to watch closely and maintain their native habitats.

ROSE goes a long way in securing all these tenuous ecosystems and makes me proud to live in a city that would make such a commitment.

We are world famous for what no longer flies here: the Xerces Blue was last seen alive in 1946. It's a long shadow of a legacy to crawl out of.

The ROSE helps reduce such a history.

I want to lend my full support behind the measure and proposal.

Thank you,
Liam O'Brien
www.sfbutterfly.com

Sent from my iPhone

Margo Bors – January 24, 2014

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have reviewed your comments in their entirety. Below you can find how your comments have contributed to improve the ROSE as well as the Department's responses to your comments and questions.

All comments the Department has received have been broken down by themes as described in the Memo to the Planning Commission, dated March 13, 2014. In **bold** below are these themes, followed by the highlights of your comments under that theme *in italics*. Finally the Department response is listed for each theme of your comments.

Other Comments (Environmental education)

Comment highlights

- *Longtime resident of SE San Francisco and volunteer for habitat restoration and environmental education, bringing underserved youth from Hunters Point to natural areas around the City. Want ROSE to include strong policies in support of stewardship and education, particularly for the young and disadvantaged.*

Department Response

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have taken note of your comments in support of stronger environmental education and stewardship programs, and appreciate you sharing about your experiences working with local youth. We have added language to Policy 5.2 (Increase awareness of the City's open space system) to emphasize programs that support ecoliteracy and youth development (see for details).

From: [Margo Bors](#)
To: [Haddadan, Kimia](#)
Subject: ROSE - 2013 Draft Recreation and Open Space Element - comment
Date: Friday, January 24, 2014 9:43:14 AM

Good Morning -

I would like to comment on ROSE, the 2013 Draft Recreation and Open Space Element. I am a resident of SE San Francisco & for many years have volunteered doing habitat restoration & taking kids from Hunters Point on field trips to natural areas around the City. I would like to see ROSE express strong official policies supporting stewardship and education. These open spaces need to be maintained and available for enjoyment and education by all citizens of San Francisco, especially the young and disadvantaged. They will be responsible for our natural heritage in the future and need to learn to value and maintain it now.

Attached is a picture of two young boys from Hunters View, part of a group on a field trip to Bay View Hill. After looking at a picture of it, they were the first in the group to spot the rare San Francisco collinsia flower, the sort of experience and lesson every child should have.

Respectfully,
Margo Bors



Mary Ann Miller, SPEAK (Sunset-Parkside Education and Action Committee)– January 24, 2014

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have reviewed your comments in their entirety. Below you can find how your comments have contributed to improve the ROSE as well as the Department's responses to your comments and questions.

All comments the Department has received have been broken down by themes as described in the Memo to the Planning Commission, dated March 13, 2014. In **bold** below are these themes, followed by the highlights of your comments under that theme *in italics*. Finally the Department response is listed for each theme of your comments.

Preservation of Open space

Comment highlights

- *New buildings are unsuitable in parks. Cultural buildings are worst of all because they attract thousands of people daily and provide experiences that require walls and turning their backs on surroundings -- these buildings belong the heart of the built-up parts of cities where access is greatest. Please restate 1986 ROSE language in 2.2.*
- *Temporary buildings: should be prohibited; temp storage containers litter parks, un-inventoried and unused. Temporary tent structures, fencing, etc sometimes kept in place for weeks during concert series, denying access to whole sections of parks. Large events damage parks/lawns. Language should be developed that only favors events if they complement the purpose of parks and discourage events longer than one day.*
- *Agree with Working Group's comments with respect to activation. More buildings, more crowds, more planned events, more organized activities and more commercialization. Passive, contemplative use of parks and protections from noise, unnecessary lights and 'programming' should be prioritized*

Department Response

We have made some modification to the language in Policy 1.3 to clarify the meaning of recreational and cultural buildings. We have received a variety of comments on this policy that would call for a balance between conflicting needs. We have received many comments asking for additional focus on recreation and improving and adding to our existing pool of recreational facilities.

Building new recreational facilities solely through acquisition of additional land is infeasible due to high costs and the scarcity of available land in the City. Therefore, this policy calls for a balanced approach to provide more recreational and cultural facilities through an efficient use of underutilized space within our existing open spaces. This policy provides specific guidelines for new or expanded facilities, and calls for replacement of open space if lost within this process.

Policy 1.1 has been modified to discuss large events in parks, acknowledging the fact that the draw of these events sometimes provides the first exposure to the City's open space resources. This policy also calls for evaluating the impacts of these events on open spaces and their surrounding neighborhoods.

Thank you for also sharing your concerns related to temporary buildings and structures. Policy 1.3 acknowledges that such structures are sometimes necessary for public safety or other important purposes. However, to the extent that such structures are used beyond their intended public purpose, they would be subject to the same criteria outlined earlier in the policy, which include guidelines to minimize their size and impact on parks.

Public Private Partnerships and Commercialization of Parks

Comment highlights

- *ROSE encourages commercialization of parks.*
- *Vendors are elevated to the level of partners while vendors are not community park advocates.*
- *Funding should and can be provided by City's general fund -- please do not adopt policy that makes parks dependent on outside sources of money / outside events. City facilities are in a much better position financially than we are led to believe and a long-range document such as ROSE should not drum up these fears.*

Department Response

The language of Policy 6.1 has been updated to further emphasize that the City has a primary responsibility to fund adequate, well-maintained parks and recreational facilities. The challenge around funding parks and open spaces has been recognized as a major concern within the past decade, as parks have been receiving less and less support from the City's General Fund. The intention of Objective 6 of this policy document is to address this funding challenge without compromising our parks and recreation as public resources. The policy acknowledges that needs are so great that costs will inevitably outpace available funds, and lists a range of potential supplemental sources of funding, including public-private partnerships, that could be explored to help increase funds and the City's capacity to provide a high quality open space and recreational system. We have modified the language and added a statement about the City's responsibility to fund parks and open spaces as public resources; and 2) added another criterion when developing public private partnerships to maintain transparency and accountability to the public. We have also applied modifications to the text to remove the impression of vendors as partners in parks. The Department believes that this Policy as modified would bring maximum protective criteria -- within the realm of a policy document-- for such partnerships to serve the public.

These funding options are not intended to replace the City's obligation to fund the park system, and the policy calls for the City to evaluate these options to assess which are an appropriate fit.

Golden Gate Park Master Plan

Comment highlights

- *The GGPMP was adopted recently and does not need revision. Please remove any suggestions to the contrary.*

Department Response

The Golden Gate Park Master Plan is the result of an extensive city and community collaboration. The result is a very beloved Master Plan for one of the city's most beloved open spaces. The ROSE in no way suggests that any process to review the Golden Gate Park Master Plan should be done unilaterally by the city. However, the ROSE is a 20 year document and the current Golden Gate Master Plan is now a 16 year old document. Life of policy documents usually span from 20 to 25 years. This ROSE policy calls for improvements to GGP and, per your suggestion, the language has been modified to make it clear that any potential changes to the Master Plan should happen with community collaboration.

Biodiversity & natural areas management

Comment highlights

- *Education/stewardship: There should be a policy promoting nature education/stewardship in parks -- more hands-on learning and volunteer participation in park planting/care. Incentives should be provided to plant native, drought tolerant, low-maintenance plants.*
- *Toxic/dangerous chemicals and artificial materials that break down over time create chemical dead zones. Please add protective policies.*
- *Natural areas: please do not open the door to "other uses" - could conflict with upcoming NAP*

Department Response

We have added language to Policy 5.2 (Increase awareness of the City's open space system) to emphasize ecoliteracy and education, and community-based stewardship is mentioned throughout the plan. We have also modified Policy 4.3 and created a separate Policy 4.4 focused on environmentally sustainable practices, which includes language about the Integrated pest management practices.

With regards to your comments on allowing other uses within natural areas, in Policy 4.2 we have made an effort to provide a balanced discussion, including several decision-making criteria, for how the City may balance the need to protect invaluable natural resources in the context of competing needs for land.

Park Standards

Comment highlights

- *Should set (or continue) an acreage goal for parks (as is currently in the 1986 ROSE). SF is limited in land, and will have growing population -- need more parkland, not less.*

Department Response

The reason that the 2013 ROSE does not have a quantitative metric for open space (such as acreage) is that the current standard widely available is a national standard which is not applicable to a dense City such as San Francisco. San Francisco, similar to other dense cities in the nation, maintains a skewed rate of open space per

person compared to the standard averages provided by national recreation and parks organizations. Recognizing this challenge, the ROSE uses a different methodology to evaluate the need for open space and recreation. The high needs area analysis incorporates a walkability analysis which identifies areas in the City that are not located within a walking distance to playgrounds, rec centers, and passive recreation areas. The Department believes that this access analysis better suits the urban character of San Francisco compared to a standard and universal metric that is created for use of by suburban and rural jurisdictions.

Other comments

Comment highlights

- *Safety/lighting: means right level of lighting, not excessive lighting or automatic lighting on unused fields/facilities.*
- *Maintenance: Parks need better maintenance, and should have trained (not unskilled) labor. ROSE should include language that requires/promotes employing well-trained staff, esp. gardeners/arborists.*

Department Response

Regarding lighting, the Department believes the existing language addresses your concern, as it calls for lighting to be "as limited as possible in order to protect wildlife in natural areas from the impacts of light pollution" while still accommodating park safety and security.

We have amended Policy 1.4 to place further emphasis on the need for maintenance, adding language that the City should continue to employ well trained staff, such as gardeners and arborists, and should seek alternative maintenance strategies to ensure better maintenance of parks.

From: [M.A. Miller](#)
To: [Haddadan, Kimia](#)
Subject: Comment letter on the ROSE
Date: Friday, January 24, 2014 11:12:44 AM

Please see below for my comments and add them to the file:
January 24, 2014

Mr. John Rahaim, Director of Planning
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103-2414

Re: 2013 Revised Draft R.O.S.E.

Dear Mr. Rahaim,

The draft document is very much improved from the former version. However, we continue to be disappointed in the Open Space protections in the 2013 document are insufficient and should be recast and expanded (OPEN SPACE AND PARKLAND PROTECTION section).

1. There should be no doubt that new buildings are unsuitable in parks. Cultural buildings are the worst of all because they attract thousands of people per day and provide experiences that require walls, turn their backs on their surroundings and focus attention on art or other displays. Cultural buildings and museums belong in the heart of the built-up parts of cities where access to them is greatest and most direct through public transportation. If a museum is placed in a park, the place will be lost as a park. The very setting which draws people to a park will be converted into a series of interiors which have no reason to exist in a park.

The 1986 R.O.S.E. left no doubt that there was no justification for building new buildings in parks. Please return to that former language in Sec.2.2.

2. Even so-called temporary buildings should be prohibited in parks. "Temporary" storage containers litter the parks, their contents often unknown, uninventoried and unused. Unknown miles of chain-link fencing cordon off parts of the parks and storage yards are filled with unused defunct material rusting away and taking up space. These were once called "temporary" and they have not been removed.

The temporary tent structures that are sometimes kept in place for weeks during a concert series are denying access to whole sections of our major parks, as in the music "festivals" in Golden Gate Park. Set-up and fence construction so that no one gets in without paying, plus tear-down time after the event, take many weeks away from the normal use of the park. Damage to the park from trucks serving the events and from hordes and their automobiles, often parked on open lawns, cannot be instantly repaired and taxes maintenance and gardener staff. The R.O.S.E.

document should discourage temporary fencing and temporary structures.

Please develop language which favors events in the parks only if they complement the basic purpose of parks and discourages events which are longer than one day.

3. Standards in the Code requiring a ratio of parkland per thousand people should be retained and not removed from the Element or the Code. With more and more residents coming to live in the City, there is an ever-increasing need for parks and the

ratio should remain (is it 5.5 acres per thousand). Exactly because San Francisco is small in area and growing in population, we need more parkland, not less. San Francisco is already the second densest city in the nation and set to grow more; more people in a tight area equals more need, not less.

4. We entirely agree with the Working Group on this subject of so-called "activation". We agree with their words in regard to commercialization and can do no better than to quote the language they developed on this subject in their letter to you, as follows: The R.O.S.E. "Emphasizes the "city" experience over enjoyment of parkland for its own sake: The frequent use of such words as "activation," and "underutilized," point to an emphasis on our parks becoming another busy, urban experience -- more buildings, more crowds, more planned events, more organized activities, and more commercialization. Many of our parks just need better maintenance. Magnificent places such as Ocean Beach are already heavily used by San Franciscans who go to the beach to enjoy the lack of urban incursions into the shoreline. Ocean Beach becomes "activated" when the sun comes out! Policy 1.5 and other sections.)

Encourages commercialization of our parks: Our parks are viewed by at least one park commissioner as opportunities for "site specific revenue generation," that is, the chance for the City to promote consumerism. Part of the consumer-oriented experience is the attitude that parks cannot be enjoyed without extensive commercial amenities. In the 2013 ROSE, vendors are elevated to the level of "partners," giving them undue influence on how our parkland is used. (Policy 6.1) Vendor buildings (kiosks) are encouraged. (Policy 1.3, section 2) However, vendors are not community park advocates; vendors run commercial ventures that are in business to make money or support a staff. The presence of vendors is an operational issue that should be given a great deal of public outreach and consideration (without regard to the testimony from all of the suppliers who make a profit off of our parks), and should be not included in this important policy document."

5. Funding for the parks should and can be provided by the general fund of the City even though in recent years, it has appeared that the parks must rely on outside earnings. The current poor management of RPD moneys, including bond money, is hopefully a temporary condition. But since today RPD is not transparent, their bookkeeping is confused and incomplete, many believe that they do not actually know how much money they have! We ask that you not adopt policy for our parks that make them so heavily dependent on other sources of money and so many outside events. This dependency creates a mindset which corrupts the very purpose of parks.

The 2013 ROSE gives vendors the status of "partners," with the influence that their money provides being more persuasive than the concerns raised by citizens and park users. Please remove any language that speaks about funding necessities and language that favors vendors. City facilities are in a much better position financially than we are led to believe and the R.O.S.E. is a long-range document which should not fall victim to this deception about the drumbeat of need for money.

6. There should be a policy promoting nature education in parks; there should be a policy invoking and encouraging stewardship of our parks. There should be an encouragement of more hands-on learning and volunteer participation in park plantings and plant care. There should be incentives for planting native plants which

can withstand drought and do not need heavy maintenance.

7. Simple nature appreciation is not a waste of space. The document should develop language that gives greater standing to the passive, contemplative use of parks and preserves them from noise, unnecessary lights and “programming”.

8. Safety in parks and recreation areas means the right levels of lighting, not excessive lighting or lighting that is on automatically and shines even when there is no game or evening usage of an area. Please include wording to that effect.

9. Safety in parks means also the absence of dangerous or toxic materials, especially those artificial materials that break down over time and create chemical dead zones which are dangerous to humans and wildlife. Please include wording that accomplishes this.

10. Please do not leave open a door to “other uses” in Natural Areas. There is a huge study and management plan for the Natural Areas that is almost ready for final approval and future administrations should not be able to deprive the people of the natural character of these the precious areas.

11. The Golden Gate Park Master Plan was adopted quite recently (1998) and does not need revision. It is a part of the R.O.S.E now and should have the force of any of the other elements of the Master Plan. Please remove any suggestion or statement about the GGPMP needing revisions because it is no longer considered relevant.

That is infuriating to those citizens who worked on producing it and reached agreement on its language after years of working together and with RPD planning staff.

12. Parks need better maintenance and the staff for this should be highly trained and not treated as unskilled labor. There should be a section in the R.O.S.E. document which requires and promotes the employment of capable and well-trained staff, especially professional gardeners and arborists. For example, Golden Gate Park needs better and more knowledgeable maintenance, not more high-volume events. Thanks to your staff for listening to the commenters and for improving the document from the seriously flawed draft of a few years ago. When in doubt about basic Goals Principles and Policies, please refer back to the 1986 document! The “old rose” never left any doubt about the true needs and purposes of our parks and recreation facilities.

Sincerely,

Mary Anne Miller

President, **SPEAK** Sunset-Parkside Education and Action Committee

Matt O’Grady, San Francisco Parks Alliance – January 24, 2014

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have reviewed your comments in their entirety. Below you can find how your comments have contributed to improve the ROSE as well as the Department’s responses to your concerns and questions.

All comments the Department has received has been broken down by themes as described in the Memo to the Planning Commission, dated March 13, 2014. In **bold** below are these themes, followed by the highlights of your comments under that theme *in italics*. Finally the Department response is listed for each theme of your comments.

Recreation

Comment highlights

- *Policy 1.1: consider referencing the SF Children's Outdoor Bill of Rights. Add “dog play and interaction with their guardians” to the list of the many ways in which San Franciscans utilize open space.*
- *Policy 1.5/ 2.4: In the description of the Blue Greenway, add access to historical resources and bicycle access as amenities that the project will provide. Add additional language on public-private and interagency partnerships along waterfront (ex: brownfield cleanup with EPA). Update Crane Cove text.*
- *Objective 5: suggest additional policy to define and measure need for recreation. Ex: benchmark for # facilities/fields.*

Department Response

Thank you for your suggestion to reference the San Francisco Children’s Outdoor Bill of Rights. Though we appreciate your request to expand language regarding children’s access to parks and recreation resources, staff decided that citing this document this would not be consistent with the level of specificity typically found in the General Plan. There are many policy documents endorsed by the RPD Commission that are consistent with policies in the ROSE, but are not included in this document. We also believe that dogs and dog owners – while legitimate and important visitors to parks and open spaces – are too specific a user group to include in Policy 1.1, is intended to provide a higher-level description of uses at recreation facilities and open spaces.

In Policies 1.5 and 2.4 we have added an emphasis on historical resources and bicycle access to the description of Blue Greenway amenities. We have also amended Policy 2.4 to encourage additional inter-governmental and other partnerships that could help improve or expand recreational access along the City’s waterfront. We have asked the Port to review the description of Crane Cove Park, and have modified the text accordingly to reflect the project’s updated geographic scope.

Regarding your request for recreation benchmarks in Objective 5, San Francisco, similar to other dense cities in the nation, maintains a skewed rate of open space per person compared to the standard averages provided by national recreation and parks organizations. Recognizing this challenge, the ROSE uses a different methodology to evaluate the need for open space and recreation. The high needs area analysis incorporates a walkability analysis which identifies areas in the City that are not located within a walking distance to playgrounds, rec

centers, and passive recreation areas. The Department strongly believes that this analysis better suits the urban character of San Francisco compared to a standard and universal metric that is created for use by suburban and rural jurisdictions.

High Needs Areas

Comment highlights

- *Policy 1.2 / 2.1: High needs areas need greater definition. Differentiate between areas with high density, youth/seniors, and economic need. Need a process to adjust over time, as population and density change*
- *Objective 2 / Introduction: should more explicitly describe significant development and population growth in urban core, as identified in Plan Bay Area. Should guide planning for both private and public open space.*

Department Response

We have made additional refinements to our high needs analysis and maps in response to comments by the Commission and members of the public. We have also added a sentence in Policy 2.1 indicating that the high needs areas map should be updated periodically with the latest decennial US Census data.

Specific high needs groups such as youth, seniors, and low-income residents are still depicted in individual maps (Maps 5A – 5D), and reflected in the final map of areas that should be prioritized for open space acquisition and renovation (Map 7: High Needs Areas: Priority Acquisition & Renovation Areas). To strengthen this analysis, we have refined our methods to use updated 2010 Census data at a block group level (rather than a census tract level), as well as modified our method of projecting future population growth. Previously, the 2013 draft of ROSE used Area Plans as a proxy for growth areas. To distribute the future growth more evenly throughout the City, the Department replaced the Area Plans with Land Use Allocations, which are determined by the Association of Bay Area Governments (See Map 5: Areas of potential additional population growth, 2040). This is the same data source used in ABAG's and MTC's regional transportation plans, including Plan Bay Area. Because regional transportation plans are updated frequently, staff felt that specific references to Plan Bay Area would become out of date quickly. However, throughout the ROSE we have mentioned the need to plan for future population growth.

POPOS

Comment highlights

- *Policy 2.12: 'Usable' is misleading word. Maybe use 'smart design' or 'community-oriented design'*

Department Response

In Policy 2.12, we replaced the adjective 'usable' (which may have multiple connotations in the planning code) with 'functional.' We have also modified the accompanying text to further emphasize that new POPOS should be accessible and designed to meet community recreation and open space needs.

Biodiversity and natural areas management

Comment highlights

- *Policy 3.6: Add a sentence recommending funding stream for tree planting/maintenance*
- *Policy 4.1: Add caveat 'wherever possible'*
- *Policy 4.3: Delete 'all' and add caveat 'where at all feasible'. Add sentence about the need for composting/mulching to improve soil conservation.*
- *Include additional policy or language stressing the need for environmental education, cultivation of ecoliteracy, and community-based stewardship. (Suggested Policy 5.6 text provided; also submitted by Damien Raffa of Presidio Trust)*

Department Response

In Policy 3.6, we have added an additional sentence recommending that the City develop long-term funding sources for tree planting and maintenance.

In Policies 4.1 and 4.3, we opted not to add the caveats 'wherever feasible and 'wherever possible'. However, we did revise the text of 4.1 to indicate that a balanced approach should be taken to ensure a healthy, resilient ecosystem, and modified 4.3 to provide more flexibility, indicating that both native and non-native (and non-invasive) plant species can contribute to biodiversity. We have also added language on composting and mulching to Policy 4.3.

Thank you for also providing suggested policy language on the importance of supporting ecoliteracy, environmental education, and community-based stewardship. We have integrated these concepts into Policy 5.2 ("Increase awareness of the City's open space system"). The added language reads: "Open spaces also provide an opportunity to increase public understanding of and appreciation for San Francisco's unique natural heritage. Larger open spaces, such as natural areas and parks, as well as smaller landscaped areas, such as POPOS and street parks, may present opportunities to build awareness and understanding of ecology and the natural world through design elements such as demonstration gardens, educational signage, and interpretive artwork. The City should continue to explore creative partnerships with community groups, educational institutions, and cultural organizations to expand environmental education programs and provide opportunities for community-based stewardship and conservation. Such programs should target youth and high-needs areas in particular."

Miscellaneous

Comment highlights

- *Cover: Please use an updated photo of Dolores Park*
- *Intro: Suggested additional sentence: "San Francisco's international visibility offers an extraordinary opportunity to lead through inspiring examples of replicable 21st century urban model of ecological sustainability and recreational excellence" -- thanks, incorporated where appropriate*
- *Page 1, last line: broaden stakeholders to read: "benefit of both city dwellers and the natural communities with whom they share the 49 square miles of San Francisco"*

- *Intro, p.6: Add program dates*
- *Page 7, 1st paragraph, line 6: In the description of Significant Natural Resource Area Management Plan, add 'education' to read 'education and volunteer opportunities'*
- *Policy 1.4: Add 311 as a resource for park maintenance requests, and add annual data for policy decisions.*
- *Policy 3.1: Add more in-depth discussion of Green Connections strategies, partnerships, and challenges.*
- *Policy 3.5: Add 'where feasible' after 'ensure'*
- *Policy 2.1: Description of acquisition should have more explicit recommendations for partnerships (w/nonprofits, others) to fund maintenance*
- *Policy 5.5: Add Streets Parks program to paragraph on DPW*
- *Miscellaneous typos / formatting issues.*

Department Response

We have updated the cover photo with an image of Dolores Park that includes Helen Diller Playground. We have also corrected all the typos and formatting issues you mentioned, where relevant.

Thank you for providing suggested language for the introductory paragraphs. Staff felt that the language was too specific for this section. For instance, “city dwellers and natural communities” leaves out many other stakeholders (visitors, workers, etc.) and we felt that we would have needed to list all such potential users. However, we believe these concepts are adequately reflected in many other sections of the ROSE. In the description of Related Plans and Agency Programs, we have included publication dates for most of the plans, but felt that dates were not necessary to describe ongoing programs. We added ‘education’ to the description of programming in connection with the Significant Natural Resource Area Management Plan.

We modified the language in Policy 1.4 to add that additional sources of user data should be used as part of parks maintenance assessment and decision making.

In Policy 5.5, we have added a reference to the Streets Parks program to the paragraph on DPW.

In Policy 3.1, we have added additional language on how Green Connections will be implemented, noting that coordination among the City, private stakeholders, and community partners will be needed to ensure that the Green Connections network is fully realized.

In Policy 3.5, we have added the qualifier ‘where feasible’, to read: “Ensure that, where feasible, recreational facilities and open spaces are physically accessible, especially for those with limited mobility.”

Regarding your comment on encouraging partnerships to fund maintenance in Policy 2.1, we have added language to Policy 1.4 which reads: “The city, especially for private and supplemental spaces, should continue to explore creative partnerships to meet maintenance goals of parks and open spaces. Where feasible and in keeping with the City’s goal of providing well-maintained spaces the City should continue to seek alternative maintenance methods, such as working with non-profit stewards, or developing alternative maintenance agreements.”



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January 24, 2014

John Rahaim
Planning Director
City and County of San Francisco
1650 Mission Street, Suite 400
San Francisco, CA 94103

Dear Mr. Rahaim:

Attached please find the San Francisco Parks Alliance's comments on the most recent draft of the Recreation and Open Space Element of the City's General Plan. As I testified at the Planning Commission earlier this month, the Parks Alliance is tremendously grateful for the amount of time and input the Planning Department has taken into account thus far in the process; we know this has been a herculean task and the current draft has much to recommend it.

For the most part, our comments are specific and relatively minor. We would like to see a more robust definition of "high-needs" that acknowledges the difference between spaces that are densely populated and those that are populated by underserved communities; we suggest a few changes in language concerning the Blue Greenway; and we would like to see the City make a deeper commitment to examining all underutilized City-owned properties as potential open space.

We suggest a few broader policy areas where a deeper look might be warranted: specifically, planning for open space on the Northern and eastern waterfront; an acknowledgment of the importance and ongoing impact (positive and negative) of the City's dog population on open space; and a more specific emphasis on the need for active recreation facilities like playing fields.

We are also grateful to the Planning Commission for acknowledging the rather short timeline for comments on this most recent draft and allowing for a modest extension. Thank you for giving us the opportunity to provide meaningful input for this round.

Please let me know if you need any further clarification of our comments.

Sincerely,

A handwritten signature in blue ink that reads "Matt O'Grady".

Matt O'Grady
Executive Director
San Francisco Parks Alliance

R.O.S.E. Draft 2013 -Comments and Questions

January 24, 2014

Executive Summary

Congratulations on arriving at this point after a long and very comprehensive community engagement process around updating the R.O.S.E. In general, the San Francisco Parks Alliance is very supportive of the document and we see it as a great leap forward in its ability to guide the City on the creation, maintenance and utilization of open space. The San Francisco Parks Alliance (SFPA) has compiled a set of comments from our staff and advisory Park Policy Council on the draft released in late November 2013. These comments and suggestions are divided into three categories 'Specific Suggestions', 'Policy Issues', and 'Typos'. These categories are then organized by the objectives and policies they address. 'Specific Suggestions' addresses detailed issues with specific policies edits including terminology, wordage, and additions. The 'Policy Issues' section looks at larger more high-level issues within the ROSE. The section 'Typos' highlights incorrect spellings, typos, and minor edits. Together these comments summarize the issues and corrections the SFPA would like to see addressed in the final draft of the ROSE. Thank you for your consideration of these comments.

Specific Suggestions

Cover:

- The photograph of Dolores Park on the cover does not include the updated Helen Diller Playground. We are happy to provide you with an updated photo.

Introduction:

- Pg 1: Great intro. To aim even higher please consider taking a broader view/global context a la "San Francisco's international visibility offers an extraordinary opportunity to lead through inspiring examples of replicable 21st century urban models of ecological sustainability and recreational excellence."
- Pg. 1, last line: Broaden stakeholders "benefit of both city dwellers and the natural communities with whom they share the 49 square miles of San Francisco."
- Pg. 6: Great inventory of plans and programs. Please add years of establishment to each element.
- Pg. 7, 1st Para, line 6: add "education and" before "volunteer"

Policy 1.1

- Pg. 9, 1st bullet: "Provide recreational opportunities that respond to user demographics and emerging recreational needs."
- Either in the preface or concluding paragraph, please consider referencing the San Francisco Children's Outdoor Bill of Rights, formally endorsed by the Recreation and Parks Commission in November 2013.

Policy 1.2 and 2.1

- Defining "high needs areas" - this term can mean many things and is used in a variety of contexts. A better definition is needed to differentiate between, for example, areas that are high needs due to density, due to large numbers of youth and seniors, or due to economic need. Additionally, a mechanism needs to be in place to adjust and redefine neighborhoods designated as "high needs areas" as population and density change over time.

Policy 1.4

- Last paragraph - suggest promoting the use of 311 for citizen-identified park problems and incorporate annual data in decision-making

Policy 1.5

- *The Blue Greenway* - "it will provide a much-needed open space system that is easily accessible for exercise, recreation, **historical resources**, and enjoyment of art and open space..."
- The Blue Greenway will also provide improved bicycle access along the Southeastern waterfront. Somewhere in the description there should be a note about this.

Policy 2.1

- *Acquisition* - Given the declining funds for maintenance, we need to include a statement about the City seeking creative partnerships for maintenance with nonprofit organizations and others to ensure that **all** neighborhoods do gain open space

Policy 2.12

- *POPOS* - 'Usable' is perhaps the wrong word. Developer's ideas of 'usable' and those of the public can be largely in opposite directions. Edit terminology to reflect 'smart design' or 'community-oriented design'

Policy 2.4

- In description of the Blue Greenway, there needs to be a reference to improved bicycle access. This should be consistent in section 1.5.

Policy 3.5

- "Ensure" is a fixed word and not always possible. Consider changing to 'ensure where at all feasible'.

Policy 3.6

- Tree planting: Please add a sentence or two recommending the development of a funding stream to encourage tree planting and maintenance.

Policy 4.1

- Include the caveat 'wherever possible'.

Policy 4.3

- Delete "all" before open space construction and replace with 'where at all feasible'. The city will be held to task with this qualifier when we may not be able to afford the requirements it dictates given existing budgets or trade offs required. In addition, on page 43, we should add something about the need and value of composting and mulching to improve soil conservation.

Policy 5.5

- DPW paragraph should specifically include Street Parks programs.

Policy Issues

Policy 1.1

- Add dog play and interaction with their guardians to the list of the many ways in which San Franciscans utilize open space.

Objective 2 / Introduction

- The ROSE should contain specific links to and discussion of its context within San Francisco's plan for significant development and population growth in the urban core and specifically refer to the growth targets identified in Plan Bay Area.
- The ROSE should guide planning for any open space whether privately or publicly owned.

Policy 2.4

- Further discussion of future waterfront development on the North and East San Francisco – through public-private and cross-agency partnerships
- Need to update description of Crane Cove Park.
- Address strategies and funding for Brownfield clean up along the Blue Greenway and other sites (i.e. partnerships with EPA)

Policy 3.1

- More in depth analysis and discussion of Green Connections – strategies, partnerships, challenges, etc.

Objective 5

- We recommend an additional policy in Objective 5 to better define and measure the need of recreation. For example, address a benchmark for determining the number of recreational facilities and fields needed in San Francisco.
- We recommend an additional policy that better defines and measures the need for education. See the attached Appendix for details and suggested wording.

Typos, etc.

- Summary, pg ii: space needed between Policy 1.9 and 1.10
- Summary, pg iii Policy 2.7: change 'with' to 'among'
- Summary, pg iii Policy 2.8; suggest replacement with: "Improve access to, and types of recreation activities allowed at San Francisco reservoirs"
- Summary, pg iii Policy 2.12 add 'signed as required' (is signage required?)
- Summary, pg iii Policy 6.2; drop the capital in 'develop'
- Document: change font in second paragraph on page 1-- WAY too small and not attractive
- Pg. 4, 2nd Para, line 3: "recreation"
- Pg 29: replace 'amenitized' (please!) with enhanced or other real word
- Pg 31, 2nd Para, line 7; Replace 'Wherever' with 'Whatever'
- Pg 41, last Para, first column, line 3: replace data 'is' with 'are' (data are plural)
- Pg 41, 1st Para, 2nd column: add in line 3: Upon completion *of the inventory*
- Throughout document: Check consistency of capitalization in headings and sub-headings

Appendix

New policy proposed by Parks Policy Council member Damien Raffa:

Policy 5.6

Increase broad public understanding of and appreciation for San Francisco's living natural heritage.

In spite of its dense urban development San Francisco offers a treasure trove for discovery and understanding of the natural world. Yet, the fragmentation of natural areas and dwarfing by the urban sphere presents a challenging context for a cohering sense of place and basic eco-literacy, or reading of urbanized landscapes and shorelines. Broad public awareness, appreciation and stewardship of San Francisco's unique urban ecology requires a comprehensive strategic plan for effective lifelong learning in a multicultural context.

1. Identify opportunities for storytelling and interpretation in existing and future parks, parklets, POPOS and other sites where meaningful place-connecting features can be integrated for public benefit. Examples include formal educational signage (kiosks, waysides, ethnobotanical plant identification tags), design elements (place-celebrating botanical and wildlife imagery in tile-based projects, woodwork, ironwork and murals), phone apps (iNaturalist), site-specific call-in audio narratives and other self-guided media.
2. Explore partnerships with local public institutions to create an intentional network of public education about local urban biodiversity and conservation (San Francisco Zoo, California Academy of Sciences, Exploratorium, Randall Museum, Aquarium by the Bay, and others). Collaborate with San Francisco Unified School District (Greening the Next Generation initiative, Education Outside program), city-based universities and colleges (California College of the Arts, San Francisco State University, CCSF), cultural organizations (Mission Cultural Center et al) and related public and school programs (Kids in Parks, Literacy for Environmental Justice, City Walks, Presidio Outdoors) to support the development of a coherent web of educational infrastructure.
3. Develop a city-wide campaign that defines "what it means to be a San Franciscan". Capitalize on the Green Connections model of neighborhood-specific totem species to nurture place-based civic pride and community. Build upon neighborhood-based identities to a larger sense of place and belonging that results in a collective ethic of care for our precious natural heritage.
4. Develop metrics for a place-connected eco-literate citizenry and evaluate progress over time.

Nancy Wuerfel, former PROSAC member - January 25, 2014

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have reviewed your comments in their entirety. Below you can find how your comments have contributed to improve the ROSE as well as the Department's responses to your comments and questions.

All comments the Department has received have been broken down by themes as described in the Memo to the Planning Commission, dated March 13, 2014. In **bold** below are these themes, followed by the highlights of your comments under that theme *in italics*. Finally the Department response is listed for each theme of your comments.

Preservation of Open space

Comment highlights

- *Preservation: Please restate 1986 policies that new rec/cultural buildings "should be located outside of existing parks and playgrounds." 2013 Policy 1.3 should reflect 1986 Policy 2.2. Preservation especially important in light of future expected growth - policy should be absolute in its protection against new buildings. (rather than subject to "rigorous public scrutiny")*

Department Response

We have made some modification to the language in Policy 1.3 to clarify the meaning of recreational and cultural buildings.

We have received a variety of comments on this policy that would call for a balance between conflicting needs. We have received many comments asking for additional focus on recreation and improving and adding to our existing pool of recreational facilities.

Building new recreational facilities solely through acquisition of additional land is infeasible due to high costs and the scarcity of available land in the City. Therefore, this policy calls for a balanced approach to provide more recreational and cultural facilities through an efficient use of underutilized space within our existing open spaces. This policy provides specific guidelines if new or expanded facilities are proposed and calls for replacement of open space if lost within this process.

Preservation of Open space

Comment highlights

- *The GGPMP was adopted recently and does not need revision. Please remove any suggestions to the contrary.*

Department Response

The Golden Gate Park Master Plan is the result of an extensive city and community collaboration. The result is a very beloved Master Plan for one of the city's most beloved open spaces. The ROSE in no way suggests that any process to review the Golden Gate Park Master Plan should be done unilaterally by the city. However, the ROSE is a 20 year document and the current Golden Gate Master Plan is now a 16 year old document. Life of policy documents usually span from 20 to 25 years. This ROSE policy calls for improvements to GGP and, per your suggestion, the language has been modified to make it clear that any potential changes to the Master Plan should happen with community collaboration.

Biodiversity & natural areas management

Comment highlights

- *Objective 4 should clearly state that all living flora and fauna need protection/preservation in our public open spaces. More clear emphasis on "natural" living things that include both native and non-native or introduced plants and animals, and balancing the amenities they offer.*

Department Response

We have modified 4.1 to further emphasize the need to consider the ultimate health and resiliency of ecosystems in a balanced, holistic way, which could include the use of both native and non-native plants. The ROSE acknowledges the contribution that non-native species can play in promoting local biodiversity. Butterfly bush (native to China) is a good example. Many species of non-native plants can serve local wildlife. Many species do not do much for wildlife habitat, but are enjoyed by humans and are not invasive. Only a small percentage of non-native species of plants are invasive. Policy 4.1 states: "In addition, parks and open spaces in San Francisco include both native and non-native species, both of which contribute to local biodiversity. The City should employ appropriate management practices, including controlling invasive species, to maintain a healthy and resilient ecosystem which preserves and protects plant and wildlife habitat."

From: [Nancy Wuerfel](#)
To: [Rahaim, John](#)
Cc: [Secretary, Commissions](#); [Frye, Tim](#); [Ionin, Jonas](#); [Haddadan, Kimia](#); ggppa@earthlink.net
Subject: Comments on 2013 Draft ROSE
Date: Saturday, January 25, 2014 8:24:34 PM

Nancy Wuerfel, 2516 23rd Avenue, San Francisco, CA 94116

January 25, 2014

Mr. John Rahaim
Director of Planning
San Francisco Planning Department
1650 Mission St, Suite 400
San Francisco, CA 94103-2414

Re: 2013 Revised Draft ROSE

Dear Director Rahaim:

Thank you and the Planning staff for making improvements in the Revised Draft of the ROSE. I appreciate the Department's interest in incorporating public comment into this vital policy document for the preservation of our limited open space. You have received outstanding, well developed comments from the ROSE WORKING GROUP which I heartily endorse. The recent comments from Mary Anne Miller, President of Sunset-Parkside Education and Action Committee (SPEAK), highlight additional important issues that require changes in the draft ROSE.

1) My request for changes include restating the 1986 ROSE policy for **preserving open space**: that new recreation and cultural buildings "should be located outside of existing parks and playgrounds." 2013 Policy 1.3 should be revised to reflect the language of the 1986 ROSE, Policy 2.2. Our public open spaces should not be viewed as raw land ready to be developed or activated by built structures. The worthiness of any new structure does not justify the elimination of increasingly limited outdoor parks and playgrounds that must serve our growing population. Of all the city departments, Planning knows in detail what the long range plans are for the increasing our population. Therefore, it is incumbent upon Planning to create and uphold a policy in the ROSE that preserves the open areas that the city still possesses in recognition of the impacts the future growth envisioned.

The policy should state that new recreational or cultural buildings to be constructed for the public require that new land be acquired for this purpose.

Unbuilt upon land is more precious than any bricks and mortar structure. It provides a legacy for future generations to respect and enjoy, because of the wisdom to conserve what we have today. Plus, it takes the politics out of deciding what is worthy "public value" of the proposed development. There is planned strife and lack of clarity in the current Policy 1.3 by leaving this important decision "to build or not to build" to the mercy of "rigorous public scrutiny." This policy should be absolute - no new buildings - without any conditions that allow backdoor interpretations that permit exchanging our open space for a building.

2) I do not agree that the **Golden Gate Park Master Plan**, needs to be revised or updated as stated in Policy 1.6. This comprehensive document was crafted over 10 years of development and is still relevant and essential to protecting our city's crown jewel from bad planning. The only reason to have a ROSE policy that changes the Master Plan is to undermine the principles that the plan outlines and promotes. Piecemeal revisions could destroy the preservation of Golden Gate Park as a landscape

park. Item 1 "Assess the Master Plan" should be deleted.

3) Objective 4 concerning ***Biodiversity*** must clearly state that all living flora and fauna in the city need protection and preservation in our public open spaces. The native plants and animals seem to be more important than the naturalized, acclimatized plants and animals that have adapted themselves to our landscape. Objective 4 needs to clearly emphasize that "natural" living things include both native and non-native or introduced plants and animals. For instance, there needs to be balance in preserving our non-native forests for the value they offer, and not view these trees as disposable in service of allowing a native plant area to be artificially created. The public's view of what is natural includes a wider definition than just native plants and animals. A recognition of this fact would assist in understanding this Objective.

Thank you for considering my comments. I hope to keep open space truly open for as long as possible!

Sincerely,

Nancy Wuerfel

Nancy Wuerfel
Member, Park Recreation Open Space Advisory Committee, 2002-2011

cc: Commissions.Secretary@sfgov.org
tim.frye@sfgov.org
Jonas.Ionin@sfgov.org
Kimia.haddadan@sfgov.org
ggppa@earthlink.net

Ruth Gravanis – January 27, 2014

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have reviewed your comments in their entirety. Below you can find how your comments have contributed to improve the ROSE as well as the Department's responses to your comments and questions.

All comments the Department has received have been broken down by themes as described in the Memo to the Planning Commission, dated March 13, 2014. In **bold** below are these themes, followed by the highlights of your comments under that theme *in italics*. Finally the Department response is listed for each theme of your comments.

Preservation of Open space

Comment highlights

- *Building creep must be prevented. Language must prevent loss of public open space.*
- *Emphasis on increasing activation and preventing underutilization misses the point of parks and open spaces as places to relax and retreat from City's intensity.*
- *Section on temporary structures needs to be revised to be more protective of park values.*

Department Response

We have received a variety of comments on this policy that would call for a balance between conflicting needs. We have received many comments asking for additional focus on recreation and improving and adding to our existing pool of recreational facilities.

Building new recreational facilities solely through acquisition of additional land is infeasible due to high costs and the scarcity of available land in the City. Therefore, this policy calls for a balanced approach to provide more recreational and cultural facilities through an efficient use of underutilized space within our existing open spaces. This policy provides specific guidelines if new or expanded facilities are proposed, and calls for replacement of open space if lost within this process.

The ROSE discusses the need for use of park for relaxation, and passive recreation activities throughout the document. We have modified the definition of recreation to distinguish between active and passive recreation; and added a reference to both active and passive enjoyment of parks in Policy 1.1. The need for activation of our open spaces was heard consistently throughout our outreach process to better utilize the resources we have, especially the ones that are underutilized. As laid out in Policy 1.1, better utilizing our parks means encouraging a wide variety of uses for all tastes and needs, including both active and passive recreation as well as tranquil spaces.

Public-private partnerships and Commercialization of parks

Comment highlights

- *Public-private partnerships are a slippery slope to be avoided. Commercialization in our parks needs to be stopped and reversed. Parks should not be expected to be self-supporting.*

Department Response

The language of Policy 6.1 has been updated to further emphasize that the City has a primary responsibility to fund adequate, well-maintained parks and recreational facilities. The challenge around funding parks and open spaces has been recognized as a major concern within the past decade, as parks have been receiving less and less support from the City's General Fund. The intention of Objective 6 of this policy document is to address this funding challenge without compromising our parks and recreation as public resources. The policy acknowledges that needs are so great that costs will inevitably outpace available funds, and lists a range of potential supplemental sources of funding, including public-private partnerships, that could be explored to help increase funds and the City's capacity to provide a high quality open space and recreational system. We have modified the language and added a statement about the City's responsibility to fund parks and open spaces as public resources; and 2) added another criterion when developing public private partnerships to maintain transparency and accountability to the public. The Department believes that this would bring maximum protective criteria -- within the realm of a policy document-- for such partnerships to serve the public.

We have also added criteria regarding public-private partnerships to emphasize that such arrangements would need to be part of a transparent, accountable process.

These funding options are not intended to replace the City's obligation to fund the park system, and the policy calls for the City to evaluate these options to assess which are an appropriate fit.

Biodiversity & natural areas management

Comment highlights

- *Adding glossary or clearer definitions could alleviate confusion. Define: natural area, significant natural resource area, biodiversity, ecosystem, ecological restoration, among others.*
- *Definition of biodiversity is incomplete; suggest definition from City's sustainability plan (see letter for excerpt)*
- *Need definition for ecological restoration: a better definition of ecosystems would help (not just turning the clock back to a specific time, but a set of relationships)*
- *Need to provide distinction between 'natural areas' and Significant Natural Resource Areas as it confuses readers. Use SNRA designation instead of more general natural areas, to indicate that these are rare, specific sites in need of protection.*
- *Suggest reinstating Policy 2.13 in 4.2, to read "Preserve, Protect, and Restore Significant Natural Resource Areas".*
- *Create new policy 4.3: "Establish a coordinated management approach for designation and protection of natural areas and watershed land".*

- *Many non-native plants do not contribute to biodiversity but are valuable for cultural, historic, aesthetics, etc. "Balance" is confusing term. Specify that where biodiversity is a goal, locally indigenous plant species are most appropriate. Rewrite paragraph on p.42*
- *Policy 4.3: Water conservation -- mention that nature-based stormwater management features can also serve as wildlife habitat while protecting the biodiversity of the Bay/ocean (by preventing CSOs and allowing aquifer recharge)*
- *Lighting: add protection for migratory birds, as well as emphasize enjoyment of the beauty and wonder of the night sky.*

Department Response

Thank you for your comments and for providing suggested policy language and references. We have added excerpts of the biodiversity definition that you provided in Policy 4.1. We also reordered the policy to read "preserve, protect, and restore." The information on ecological restoration, while informative, was in greater detail than called for by this type of long-range policy document.

We have also rewritten 4.1 to emphasize ecosystem health and resilience, which could include both native and non-native plants. Policy 4.1 acknowledges the contribution that non-native species can play in promoting local biodiversity, but emphasizes that invasive species should be managed, stating: "In addition, parks and open spaces in San Francisco include both native and non-native species, both of which contribute to local biodiversity. The City should employ appropriate management practices, including controlling invasive species, to maintain a healthy and resilient ecosystem which preserves and protects plant and wildlife habitat." We have added language in Policy 4.3 to encourage propagation of native and drought-tolerant plants to further support their availability and use.

Regarding Policy 4.2, the text is meant to refer to both Significant Natural Resource Areas managed by RPD, as well as non-SNRA open spaces that provide considerable amounts of valuable habitat. We have made an effort to discuss the process for evaluating and protecting these areas under diverse ownership.

We have added language in Policy 4.3 regarding stormwater management to emphasize that features such as bioswales or creek restoration can have biodiversity co-benefits.

Regarding lighting, the Department believes the existing language of Policy 4.3 addresses your concern, as it calls for lighting to be "as limited as possible in order to protect wildlife in natural areas from the impacts of light pollution" while still accommodating park safety and security.

Additionally, elements not related to biodiversity in Policy 4.3 have been separated from the list and made into a new policy focused on environmental sustainability in all parks ("Include environmentally sustainable design practices in construction, renovation, management and maintenance of open space and recreation facilities").

Park standards

Comment highlights

- *Should set (or continue) an acreage goal for parks (as is currently in the 1986 ROSE). Perhaps should be provided by area rather than City wide, given the need for equitable distribution. No standards are provided to evaluate success of Objective 2 (increase OS to meet long term needs of city/region).*

Department Response

The reason that the 2013 ROSE does not have a quantitative metric for open space (such as acreage) is that the current standard widely available is a national standard which is not applicable to a dense City such as San Francisco. San Francisco, similar to other dense cities in the nation, maintains a skewed rate of open space per person compared to the standard averages provided by national recreation and parks organizations. Recognizing this challenge, the ROSE uses a different methodology to evaluate the need for open space and recreation. The high needs area analysis incorporates a walkability analysis which identifies areas in the City that are not located within a walking distance to playgrounds, rec centers, and passive recreation areas. The Department believes that this access analysis better suits the urban character of San Francisco compared to a standard and universal metric that is created for use of by suburban and rural jurisdictions.

Other Comments

Comment highlights

- *Negative impacts of large scale events are not taken into account adequately.*
- *There is too high a priority given to art.*

Department Response

Policy 1.1 has been modified to discuss large events in parks, acknowledging the fact that the draw of these events sometimes provides the first exposure to the City's open space resources. This policy also calls for evaluating the impacts of these events on open spaces and their surrounding neighborhoods.

The notion of art in parks and public space has been the City's policy for decades. As mentioned in the policy language, the City law requires art in all public projects. This policy acknowledges this law along with the public's interest in enjoying art in public space and emphasizes the need to ensure such art is publicly accessible and visible.

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January 27, 2014

M. Kimia Haddadan
Department of City Planning
1650 Mission Street
San Francisco, CA 94103

Re: Comments on the Draft ROSE

Dear Kimia,

My apologies that these comments are so last-minute and so rushed.

Many of my comments coincide with those already submitted by the ROSE Working Group. While there may be considerable disagreement within the parks and open space advocacy community over various provisions in Objective 4 (please see my comments, below), I wish to stress that there is a large constituency that is united in its support of the WG's comments related to the following:

- "Building creep" must be stopped and prevented; buildings for cultural uses are not park-appropriate.
- There is too high a priority given to art.
- The Draft's emphasis on increasing activation and preventing underutilization misses the point of parks and open spaces as places to relax and retreat from the City's intensity.
- The ROSE must retain language that reinforces the need for **public** open space; no loss of recreation and open space should be allowed to occur.
- The public-private partnership concept is a slippery slope to be avoided.
- Commercialization in our parks needs to be stopped and reversed. Parks should not be expected to be self-supporting.
- The ROSE should provide for a more adequate and equitable distribution of recreational facilities and services. Low-income residents, especially, should not have to pay for recreation.
- The negative impacts of large-scale events are not adequately taken into account.
- The section on temporary structures needs to be revised to be more protective of park values.

In addition, I question the disappearance of the language in the current ROSE that specifies a ratio of 5.5 acres of open space per 1,000 residents. How can the General Plan serve as a meaningful guideline if it provides no goal regarding how much open space is needed by a given population? Perhaps such a target would be more useful if it were by area than citywide, given the need for a more equitable distribution.

While Objective 2 says “**INCREASE OPEN SPACE TO MEET THE LONG-TERM NEEDS OF THE CITY AND BAY REGION**”, none of the policies adequately support that intention, and without any standards there is no way we can evaluate our success toward meeting it.

Objective 4 - Biodiversity, Habitat Value and Ecological Integrity

There is a lot of confusion regarding this objective, and much of it could be alleviated by providing clearer definitions and explanations. At one time we discussed the possibility of providing a glossary for the whole document. There should at least be definitions within the text or in a conspicuous sidebar on the relevant page. Terms that should be defined include: natural area, significant natural resource area, biodiversity, ecosystem, ecological restoration and more.

Page 41

This definition is incomplete, assuming it's intended to be a definition:

Biodiversity includes the variety of living organisms, the genetic differences among them, and the communities and ecosystems in which they occur.

I suggest the following, taken in part from the City's Sustainability Plan:

Biodiversity is the variety of organisms considered at all levels from genetic variants belonging to the same species, through arrays of species, to arrays of genera, families, and still higher levels of organization, along with the systems and processes that sustain them over time. Maintaining biodiversity requires maintaining genetic diversity, species diversity and habitat diversity.

In this document, biodiversity is used to mean diversity that is ongoing. Thus, adding a new element that increases the number of species for a moment but results in a future displacement of other species over time does not contribute to an area's biodiversity.

Another term needing definition is ecological restoration.

There's a myth circulating about that says that restoration means creating a landscape that looks as it did at some prior moment in time. In fact, restoration means undoing the damage and relieving the stresses and restoring the processes – processes such as pollination, dispersal, death, decomposition, germination, etc. that are ongoing. Often, restoration simply involves removing introduced vegetation that has invaded an area and allowing the pre-existing seed-bank to germinate and flourish or a variety of nearby indigenous species to return. Evidently, it needs to be pointed out in the text that no one is trying to “turn back the clock” to 1769 or any other year. This might be easier for folks to understand if a definition were provided for the word “ecosystem.” It isn't a snapshot taken at a particular moment. An ecosystem includes relationships, interdependencies, and ongoing processes as well as biota, soil chemistry, hydrology, etc., etc. The plants and animals in a given ecosystem have evolved together over time, continually adapting to each other and their surroundings.

In explaining restoration, it is also important to state that no one is removing non-native plants just because they are not native. Rather, only those particular plants that pose a threat to native biodiversity are slated for removal. And even then, those invasive exotics with value to local wildlife are only removed as part of a phased approach that assures that habitat values are retained during project implementation.

I can see how many readers would be confused by Policy 4.2. No distinction is made between "natural areas" (subject to multiple interpretations) and Significant Natural Resource Areas (a term of art defined specifically in Policy 2.13 in the current ROSE but only obscurely in the latest Draft ROSE).

Please reinstate Policy 2.13 as its own stand-alone policy, perhaps as a new 4.2. The title should be amended to read:

Preserve, Protect and **Restore** Significant Natural Resource Areas.

Then create a new policy 4.3 for “Establish a coordinated management approach for designation and protection of natural areas and watershed lands.”

First say what the SNRAs **are** and why we need to protect and restore them and then talk about coordination and management. The two concepts are each so important that they should not be “mushed” together.

Then, whenever the document means SNRAs as opposed to the generic “natural areas” please use “SNRAs.” That will help the reader see that it is very difficult for a site to qualify as a SNRA and that there are very few such sites remaining in private hands. That might help reduce the fear of some sort of takeover by natural areas.

Page 42

This paragraph needs a careful re-write, which I don't have time to do right now:

In addition, parks and open spaces in San Francisco include both native and non-native species, both of which contribute to local biodiversity. The City should employ appropriate management practices to protect a well-balanced ecosystem which protects native species and preserves existing wildlife habitat.

The foregoing ignores the fact that our parks contain a lot of non-native plants that contribute very little to biodiversity but are very valuable for cultural historic, aesthetic and other reasons. Not all landscaping needs to contribute to biodiversity. No one is proposing to tear out half the Rose Garden or Fuchsia Garden or Conservatory of Flowers or any other of our wonderful and iconic horticultural assets to install native plants to create some sort of “balance.” “Balance” is a confusing and irrelevant term here.

What needs to be said is that **where** local and sustainable biodiversity is a goal, the best way to achieve it is almost always with locally indigenous plant species. And while many non-natives do provide habitat values for native wildlife (e.g., as nectar sources for butterflies and hummingbirds), **some** non-native plants displace naturally occurring vegetation and reduce biodiversity over time.

It is misleading to say, “. . . native and non-native species, both of which contribute to local biodiversity,” because only **some** non-natives contribute, and many detract.

Policy 4.3

Water conservation, recycling/reuse, and stormwater mitigation.

Mention somewhere here that nature-based stormwater management features can also serve as wildlife habitat while protecting the biodiversity of the Bay and ocean (by preventing CSOs) and allowing aquifer recharge.

Lighting. Park lighting should be environmentally efficient and provide safety and security to park users, while being as limited as possible in order to protect wildlife in natural areas, **as well as migratory birds throughout the city**, from the impacts of light pollution. **It is also important to allow people to enjoy the beauty and wonder of the night sky.**

I hope you find these comments and suggestions to be understandable and useful.

Sincerely,

Ruth Gravanis

Sheffield Hale – January 26, 2014

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have reviewed your comments in their entirety. Below you can find how your comments have contributed to improve the ROSE as well as the Department's responses to your comments and questions.

All comments the Department has received have been broken down by themes as described in the Memo to the Planning Commission, dated March 13, 2014. In **bold** below are these themes, followed by the highlights of your comments under that theme *in italics*. Finally the Department response is listed for each theme of your comments.

Biodiversity & natural areas management

Comment highlights

- *Strongly supports Objective 4 and would only add that it should address open space quantity as well.*

Department Response

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have taken note of your comments in support of Objective 4.

From: [Sheffield Hale](#)
To: [Haddadan, Kimia](#)
Subject: ROSE Update Comment
Date: Sunday, January 26, 2014 9:44:21 PM

Kimia,

I strongly support Objective 4 on biodiversity and would only add that it should address open space quantity as well.

Thank you for all of your hard work,
Sheffield

--

Sheffield Hale
(404) 697-2410
sheffield.hale@gmail.com

Svetlana Savchuk – January 7, 2014

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have reviewed your comments in their entirety. Below you can find how your comments have contributed to improve the ROSE as well as the Department's responses to your comments and questions.

All comments the Department has received have been broken down by themes as described in the Memo to the Planning Commission, dated March 13, 2014. In **bold** below are these themes, followed by the highlights of your comments under that theme *in italics*. Finally the Department response is listed for each theme of your comments.

Biodiversity & natural areas management

Comment highlights

- *Policy 3.6: All healthy trees should be preserved, in this time of accelerating global warming and extreme weather. SNRAMP proposes to eliminate 18,500 healthy park trees and should not be allowed.*
- *Pesticides: NAP should not be allowed to use toxic Tier 1 & 2 herbicides which have been linked to many negative health and environmental impacts. Need a City ban.*
- *“Native species” - term is not defined and should not be used. Should not get preferential treatment and should not be used to justify tree removal / herbicide use.*

Department Response

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have taken note of your comments in support of preserving trees and reducing the use of toxic herbicides in parks and open spaces.

While an outright ban of herbicides goes beyond the scope of this plan, we have made edits to Objective 4 to emphasize the need for a balanced approach to habitat management that prioritizes holistic ecosystem health and resiliency.

We have also expanded Policy 4.3 and added an additional Policy 4.4 focused on environmentally sustainable practices in construction, renovation, management and maintenance of open space and recreation facilities. This policy states that the City should continue to follow the Integrated Pest Management (IPM) ordinance. See policy text for a description of this program.

Policy 3.6 also cites the City's draft Urban Forest Plan, which will help protect street trees and is proposed to be followed by subsequent planning efforts to consider how trees are managed on park and private lands.

With regard to your comment on the term “native species”, SF Environment has provided two resources that ecologists use to catalogue native species, which are in active use by native plant restoration efforts. They are:

A Flora of San Francisco, 1958 by John Thomas Howell

The San Francisco Plant Checklist: <http://www.wood-biological.com/san-francisco-plant-checklist/>

From: [Svetlana Savchuk](#)
To: [Haddadan, Kimia](#)
Subject: ROSE comment
Date: Tuesday, January 07, 2014 10:52:21 AM

Dear Ms. Haddadan,

My comment to Recreation and Open Space Element document is below:

1.

“The urban forest contributes substantially to our quality of life and to the ecological functioning of our city. Trees ... soften the urban environment, provide habitat, improve air quality, absorb carbon, and mitigate storm water runoff.” - policy 3.6 of ROSE.

We live at the time of the accelerating global warming with extreme storms and weather events happening around the globe. The trees are very important and ALL healthy trees should be preserved - not destroyed. Trees protection clause should be included in ROSE! It is absolutely necessary because instead of planting trees and preserving the ones we have, San Francisco treats them as totally disposable. The Natural Areas Program (NAP) in Significant Natural Resource Management Plan (SNRAMP) – proposes to eliminate 18,500 healthy park trees: 3,500 in the city itself and 15,000 in the Sharp Park to **“convert MA-1 and MA-2 areas to native scrub, and grassland habitats.”** RPD/NAP designate trees as "non-native"/"invasive" and eliminates them even before SNRAMP has been certified - in addition to this horrific plan - increasing air pollution and releasing carbon into the atmosphere.

2.

It is very important for the health and well being of the city residents to discontinue use of tier I & II herbicides in our parks.

It is frustrating and infuriating to see herbicides which have been epidemiologically linked to non-Hodkin Lymphoma, multiple myeloma, leukemia, breast and prostate cancers in places where children play, people and their pets walk, wild life makes its home. The Natural Areas Program (NAP) - which has a nice name but awful practices - uses the most of these toxins. The use of Tier I and II herbicides by NAP has increased by all measures – the number of applications, volume of herbicides used, volume of active ingredient, and volumes by acid equivalent – by 200% to 400% from 2008 (first year for which the data is available) to 2012. In first half of 2013 “Natural” Areas Program (NAP) had used much more herbicides than all other parts of Recreation and Park Department’s combined (including all golf courses, except Harding): about 5 times more per unit of managed land than the rest of RPD.

NAP/RPD constantly uses:

Triclopyr (Garlon), Glyphosate (Roundup, Aquamaster), Imazapyr (Polaris), Aminopyralid (Milestone™).

Here is a partial description of harmful effects of one of them - Glyphosate:

It kills birds, fish, tadpoles, bees, worms - at least 76 different species. It dissolves readily and is very persistent in water. It is listed by PAN International (Pesticide Action Network) as highly hazardous. It is listed as "dangerous for the environment" by the European Union. Its maker, Monsanto, was convicted of false advertising (claiming that Roundup is “practically non-toxic” to mammals, birds, and fish) in

France in 2007 and the ruling was upheld by the France Supreme Court in 2009. A University of Pittsburgh biologist has found that the herbicide caused 86% decline in the total population of tadpoles. According to EPA, short term exposure to elevated levels of glyphosate may cause lung congestion and increased breathing rates and, in long-term exposure, kidney damage, and reproductive effect. It has been associated with Parkinson disease. Increased adverse neurologic and neurobehavioral effects have been found in children of applicators of glyphosate. Female partners of workers who apply glyphosate are at higher risk of spontaneous abortion. Some glyphosate based formulations and metabolic products have been found to cause the death of human embryonic, placental, and umbilical cells in vitro even at low concentrations.

Similarly frightening lists can be provided for the other three poisons.

Their use in San Francisco parks contradicts the Health and Safety principle of ROSE - it DOES NOT support the "long-term health of people, plants, and animals".

I urge you to set up a goal of totally discontinuing and banning their use in our parks.

3.

The term "native" is undefined and as such should not be used. Specifically, "native" plants should not get preferential treatment. "Native" "restorations" are harmful to the environment (destruction of trees, use of toxins) and should stop.

Sincerely,
Svetlana Savchuk
1733 7th Ave.,
San Francisco, CA 94122

Tom Radulovich, Livable City – January 27, 2014

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have reviewed your comments in their entirety. Below you can find how your comments have contributed to improve the ROSE as well as the Department's responses to your comments and questions.

All comments the Department has received have been broken down by themes as described in the Memo to the Planning Commission, dated March 13, 2014. In **bold** below are these themes, followed by the highlights of your comments under that theme *in italics*. Finally the Department response is listed for each theme of your comments.

Biodiversity & natural areas management

Comment highlights

- *Policy 3.3 - The restoring watercourses idea is exciting -- want to see further development/detail and links to relevant plans (i.e. Glen Park, Islais Creek, etc.)*

Department Response

We have added language to Policy 3.3 that emphasizes the value of restoring historic watercourses for recreational and ecological purposes. We have also indicated that some neighborhood and area plans recommend these projects, such as the one for Glen Park.

POPOS

Comment highlights

- *Policy 2.12 - POPOS or Paseos? Currently POPOS are not attractive or publicly accessible. Using public realm more creatively to extend pedestrian space would be more effective (as in Rincon Hill Plan, MB North, EN). ROSE should strengthen and support mid-block alleys.*

Department Response

Given the scarcity of open space and available land in denser City neighborhoods, we feel that the ROSE should recommend both POPOS and the creative use of public streets through projects such as Living Streets and Alleys (described in Policy 3.1) as complementary strategies to help address these needs. We understand your concerns about the functionality of current POPOS. Policy 2.12 has been modified to call for evaluation of POPOS requirements to determine how they can be strengthened and expanded citywide. This policy acknowledges that there is wide variation in POPOS and that some are more accessible and functional than others, and that the City should ensure that future POPOS are better designed to meet community open space needs.

Other comments

Comment highlights

- *Port paper streets are an underutilized open space / view corridor resource, if they can be recovered from surface parking.*
- *Webster St: between Fulton and Pine, is widened with large median -- opportunity for lane closures to create usable open space / street park like Patricia's Green.*

Department Response

Repurposing underutilized streets that could serve as open space is a goal woven throughout the ROSE, specifically in Objective 3 (“Improve access and connectivity to open space”). In combination with Policy 2.4 (“Support the development of signature public open spaces along the shoreline”), we feel that the ROSE supports the use of rights-of-way at the Port and elsewhere as potential opportunities to expand open space.

While it is beyond the scope of the ROSE to suggest specific street segments that could be converted to open spaces and greenways, we appreciate your comment on Webster Street as another potential open space resource and encourage you to raise the idea as part of future planning efforts in the area.

From: [Tom Radulovich](#)
To: [Haddadan, Kimia](#)
Subject: ROSE comments
Date: Monday, January 27, 2014 2:41:25 PM

Hi Kimia,

I reviewed the draft ROSE, and have a few comments for your consideration:

1. POPOS or Paseos? (Policy 2.12). There is not much point to adding more POPOS on the current model (dull corporate plazas with ugly sculptures, or upper-story or enclosed spaces that are functionally private amenities for building tenants); additional signage is not likely to change this dynamic very much. What would be more interesting is to use POPOS, or better, new public streets, to extend the fine-grained pedestrian network through the Downtown and adjacent areas - turn Service and Passthrough alleyways into Destination Alleyways (per the Downtown Streetscape Plan); reclaim existing public rights-of-way as public plazas (Mint Plaza, for example; it's not a POPOS, but is similar in that the adjacent property owner built, maintains, and programs the space); or break up the SOMA superblocks by creating missing mid-block connections.

This approach - strengthening the ground-level pedestrian connections through the downtown - has been city policy since at least the Downtown Plan (see map 7 from the Downtown Plan, below). More recently we have put some planning code tools in place to advance these policies - The Rincon Hill Plan requires mid-block paseos, as does the Mission Bay North Plan; the Eastern Neighborhoods plan added Section 270.2 to the Planning Code (requiring mid-block alleys to break up large development sites); in 2010 these requirements were extended to C-3 and C-M districts. The ROSE should articulate this longtime strategy in its policies.

Similarly, the proposed open spaces in Pier 70 and elsewhere can be thought of as 'grid repair' strategies - providing open space and enhancing view corridors by extending the pedestrian-scaled block pattern.

2. Restoring watercourses: There is the kernel of a very exciting idea in Policy 3.3 that needs to be drawn out further: **Develop and enhance the City's recreational trail system, linking to the regional hiking and biking trail system and considering restoring historic water courses to provide trail connections, restore aquatic and riparian habitat, and improve stormwater management.** Stormwater management is interesting, but becomes more interesting when it is linked to healthy outdoor recreation and habitat restoration. One project along these lines, restoring Islais Creek from Glen Canyon Park to the BART station, was identified conceptually in the Glen Park Plan, and is present elsewhere in the ROSE as the Golden Gate Park to McLaren Park greenway. The policy seems to be headed in this direction, but needs a few more words to articulate the idea.

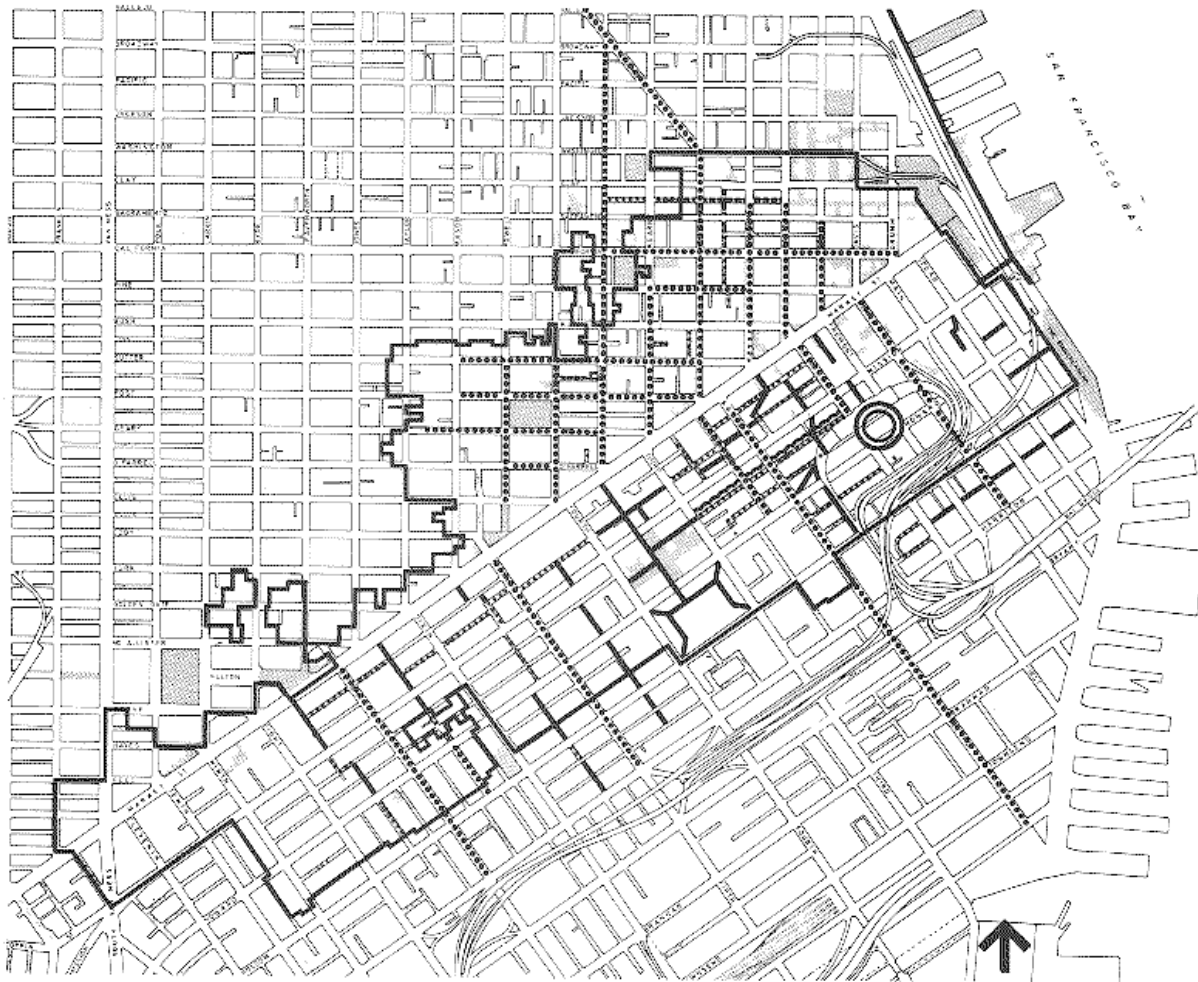
3. Webster Street: the overly-wide blocks of Webster Street between Fulton and Pine, widened to four lanes by the SF redevelopment agency for mysterious reasons, are a great potential open space resource. If the two lanes in each direction were reduced to one skinny lane, Webster Street could become an eight-block-long Patricia's Green.

4. biodiversity and natural areas: I also support stronger policies for preserving and restoring natural areas, as Ruth Gravanis, Arthur Feinstein, Peter Brastow, and others have articulated. San Francisco is in a globally recognized center of biodiversity (UNESCO, Conservation International, etc.); our city policies should acknowledge the importance of preserving and restoring biodiversity - terrestrial, freshwater, and marine.

5. Port paper streets: the undeveloped streets on the land side of the Embarcadero in Port jurisdiction have potential to be living streets, pedestrian plazas, and open up view corridors if they can be reclaimed from surface parking.

Best,

Tom



0 400FT

PROPOSED PEDESTRIAN NETWORK: DOWNTOWN DISTRICT

Map 7

- Pedestrian/ Service Street
- Part Time Pedestrian Street
- Exclusive Pedestrian Walkway
- Pedestrian Oriented/ Vehicular Street
- ▨ Open Space
(Existing, Planned, and Proposed)
- ~ Arcade
- Provide Open Space In The General Vicinity

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**SAN FRANCISCO
PLANNING DEPARTMENT**

RECREATION & OPEN SPACE ELEMENT

FINAL DRAFT: MARCH 2014

**All Public Comments on 2013 Draft and Responses to Those
Public Comments**

Part 2: Group Comments

Robert Bakewell, Eddie Bartley, Judith Berkowitz, Jan Blum, Arthur Feinstein, Hiroshi Futuka, Greg Gaar, Ruth Gravanis, Amber Hasselbring, Kathy Howard, Greg Miller, Mary Anne Miller, Dan Murphy, Liam O'Brien, Jake Sigg, Noreen Weeden, George Wooding, Matt Zlatunich

February 21, 2014

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have reviewed your comments in their entirety. Below you can find how your comments have contributed to improve the ROSE as well as the Department's responses to your comments and questions.

All comments the Department has received have been broken down by themes as described in the Memo to the Planning Commission, dated March 13, 2014. In **bold** below are these themes, followed by the highlights of your comments under that theme *in italics*. Finally the Department response is listed for each theme of your comments.

Recreation & open space acquisition (High Needs Areas)

Comment highlights

- *City needs more open space and recreational facilities and services*
- *City must meet the needs of the current population*
- *City must allocate funds to purchase land as it becomes available.*
- *City should set standards in the ROSE regarding the amount of open space and recreational assets.*
- *City must require future development to comply with set standards to meet open space and recreational needs.*

Department Response

The High Needs Areas are based on a series of factors, including existing population density, existing incomes, existing population of youth, existing population of seniors, existing walking distances to passive areas, existing walking distance to playgrounds, existing walking distance to active areas, and future population growth. The future growth of the population is one factor amongst all of these and it is a factor staff has heard repeatedly should be considered as part of any new growth in the City.

Staff agrees the City should fund the acquisition of open space and this need for funding is mentioned throughout the document.

The reason that the 2013 ROSE does not have a quantitative metric for open space (such as acreage) is that the current standard widely available is a national standard which is not applicable to a dense City such as San Francisco. San Francisco, similar to other dense cities in the nation, maintains a skewed rate of open space per person compared to the standard averages provided by national recreation and parks organizations. Recognizing this challenge, the ROSE uses a different methodology to evaluate the need for open space and recreation. The high needs area analysis incorporates a walkability analysis which identifies areas in the City that are not located within a walking distance to playgrounds, rec centers, and passive recreation areas. The Department believes that this access analysis better suits the urban character of San Francisco compared to a standard and universal metric that is created for use of by suburban and rural jurisdictions.

The City does require that development complies with private open space requirements and additionally, all recently adopted area plans require impact fees to pay for public open space.

The City's park and open space system requires more financial resources. Recreation and open space should not be expected to be self-supporting.

Park funding

Comment highlights

- *Concern that the underlying mandate of the ROSE is revenue generation*
- *Open space system should be funded by a fair share of the General Fund*
- *Public land should not be handed over to the private sector*
- *Tax dollars should support parks and parks should not be chiefly their own revenue generators*
- *ROSE should assure equitable share of public assets go to the most needy.*

Department Response

Throughout the process staff has heard numerous comments about concerns regarding funding for both maintenance and acquisition. It is unclear how the ROSE is being interpreted to have an “underlying mandate for revenue generation” but it is noted throughout the ROSE that funding challenges have been recognized for decades (even the 1986 ROSE mentions the challenges of funding for acquisition and maintenance.)

The intention of Objective 6 is to address this funding challenge without compromising our parks and recreation as public resources. Policy 6.1 includes a number of possible solutions to begin to address the funding challenges – these are simply options that can be pursued if the political and community interest is there, and the City would need to evaluate these options in more detail to assess which are an appropriate fit. These funding options are not intended to replace the City's obligation to fund the park system, and the language of Policy 6.1 has been updated to further emphasize that the City has a primary responsibility to fund adequate, well-maintained parks and recreational facilities.

In response to ensuring the equitable share of public assets go to the most needy, the high needs areas does just that by including low income, high concentrations of youth, seniors and high density neighborhoods as part of the criteria for priority funding.

Other comments

Comment highlights

- *The ROSE is not yet ready and is being rushed through the process.*

Department Response

After seven years of process, four drafts, and ample outreach, we believe the final draft ROSE reflects an extensive community process and is not being rushed.

February 21, 2014

Honorable Cindy Wu, President
San Francisco Planning Commission
1660 Mission Street, Suite 500
San Francisco, CA 93103

Re: Limitations in current Draft 2013 ROSE and need for modifications

Dear President Wu and Members of the Planning Commission:

The undersigned individuals have long-standing interests and involvement in promoting the well being of our parks and open spaces and in meeting the recreational needs of the City's residents. Some of us have already submitted letters expressing our concerns about specific aspects of the Draft ROSE; others have signed on to add their voice to the following concerns:

We challenge the notion expressed in the Draft ROSE that San Francisco is limited to "making the most with what we have." This philosophy of "low expectations" seems to accept that we will never have enough open space and recreational facilities and services and that there is nothing to be done about that. It seems designed to ensure that recreational facilities and open space that are inadequate for residents' needs today will remain inadequate as the population increases over the next twenty years. To combat these low expectations, the ROSE should embrace the following overarching principles:

The City needs more open space and recreational facilities and services.

- The City must first meet the needs of the current population. There are areas in San Francisco today (e.g., Chinatown and the Tenderloin) that do not have adequate recreational facilities and services and open space.
- The City must allocate funds to purchase land as it becomes available. San Francisco will only become more dense, and land will become even more expensive. The time to plan for and to purchase land is now.
- The City should set standards in the ROSE regarding the amount of open space acreage and recreational facilities and services needed for the City as a whole. The ROSE needs to set clear and measurable goals for open space and recreational assets per resident, because without citing specific metrics in the policies, there is no way to evaluate our success toward achieving the ROSE's objectives.
- The City must require that future development, both public and private, comply with set standards to meet the open space and recreational needs of the new residents who will occupy any new units created.

The City's park and open space system requires more financial resources. Recreation and open space should not be expected to be self-supporting.

- It appears that an underlying mandate driving the 2013 Draft ROSE is revenue generation, but parks are not supposed to be revenue generators.
- The open space and recreation system should be funded by a fair share of the General Fund, and adequate funding needs to be allocated on a consistent basis. The Recreation and Park Department has responsibility for 12% of the land, but its share of the General Fund budget is currently only about 2%.
- San Franciscans have paid taxes and supported the City in good times and bad times and deserve control of their own open space assets; public responsibilities and control of public land should not be handed over to the private sector.
- In a great City such as San Francisco, park users should not have to pay for open space access and recreational opportunities that should be free.
- Every resident uses parks, open space, and recreation facilities and services and it is entirely appropriate to use tax dollars to support them. Parks should not be chiefly their own revenue generators.
- The ROSE should democratically even out the social playing field by assuring an equitable sharing of public assets with the most needy. Parks and recreation assets should be of high quality – in design, maintenance and operation – in every neighborhood.

The Draft ROSE is not yet ready to be considered for approval. Recreation and Open Space are important to every San Franciscan. It's more important that we get the ROSE right, than that we get it done quickly. There's no rush – the current ROSE (1986) is quite adequate in the interim.

The Draft ROSE is deficient in its vision and as a guiding document for open space and recreation for San Franciscans today and into the future. We urge you to take whatever time is necessary to make the new ROSE a General Plan element that will serve the City's residents well for years to come.

Sincerely,

Robert Bakewell
Eddie Bartley
Judith Berkowitz
Jan Blum
Arthur Feinstein
Hiroshi Fukuda

Greg Gaar
Ruth Gravanis
Amber Hasselbring
Kathy Howard
Greg Miller
Mary Anne Miller

Dan Murphy
Liam O'Brien
Jake Sigg
Noreen Weeden
George Wooding
Matt Zlatunich

cc: Planning Director John Rahaim
Kimia Haddadan
Susan Exline

San Francisco Board of Supervisors
San Francisco Recreation and Park Commission

ROSE Comment Group Combined Comment Packet - February 10, 2014

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have reviewed your comments in their entirety. Below you can find how your comments have contributed to improve the ROSE as well as the Department's responses to your comments and questions.

All comments the Department has received has been broken down by themes as described in the Memo to the Planning Commission, dated March 13, 2014. In **bold** below are these themes, followed by the highlights of your comments under that theme *in italics*. Finally the Department response is listed for each theme of your comments.

Preservation of Open space

Comment highlights

- *Use the language from 1986 ROSE stating the new cultural and recreational building should be located outside of existing parks and playgrounds.*
- *Policy 1.3 encourages "cultural" buildings and other built features in our parks. The term "cultural" is not defined.*
- *Last paragraph of policy 1.3 allows for temporary structures in parks but they should require a public hearing and BOS approval.*
- *Add this sentence: "It is essential that the City preserve the public recreation and open space that remains, and that no loss of recreation and open space occurs."*
- *Frequent use of such words as "activation" and "underutilized" point to an emphasis on our parks becoming another busy, urban experience—more buildings, more crowds, more planned events, more organized activities, and more commercialization.*

Department Response

We have made modifications to the language in Policy 1.3 to clarify the meaning of recreational and cultural facilities. We have received a variety of comments on this policy that would call for a balance between conflicting needs. We have received many comments asking for additional focus on recreation and improving and adding to our existing pool of recreational facilities. Responding to this need only through acquiring "new land" dedicated to recreational facilities proves infeasible due to the lack of available land in our dense city. Therefore, this policy calls for a balanced approach in providing more recreational and cultural facilities through an efficient use of existing underutilized space within our existing open space land. This policy provides a meticulous process for allowing such recreational and cultural buildings or the expansion of such buildings . Moreover, this policy also asks for replacement of open space if any is lost within this process.

The role of parks and open spaces as places for restorative, passive contemplation is critical, and can provide many benefits, as cited in the Introduction of the ROSE. The ROSE discusses the need for use of park for relaxation, and passive recreation activities throughout the document. We have modified the definition of recreation to distinguish between active and passive recreation; and added a reference to both active and passive enjoyment of parks in Policy 1.1. The need for activation of our open spaces was heard consistently

throughout our outreach process to better utilize the resources we have, especially the ones that are underutilized. As laid out in Policy 1.1, better utilizing our parks means encouraging a wide variety of uses for all tastes and needs, including both active and passive recreation as well as tranquil spaces.

Recreation

Comment highlights

- *Recreation was not a clear directive in the ROSE and recreation stakeholders have not reached out to during the process.*
- *ROSE has to establish a clear statement to increase active recreation facilities (policy 2.3, page 9).*
- *Consistent Definition for Recreation, distinguish between active and passive recreation (page 29, Policy 2.11 (page 31) Policy 3.1, page 34)*
- *Add the term recreation to these sections: Policy 1.3, Policy 1.4, Objective 2, Objective 6*
- *Needs to create a benchmark to determine how many recreational facilities are needed, using National Recreation and Parks Association (NARPA) Standard.*
- *There needs to be stronger statement to maintain and renovate existing recreational facilities*
- *Concerns about User surveys: If a facility does not get that much use, it does not mean residents don't want them. Policy 1.2, page 9 and Policy 5.1, page 44*
- *Private recreation requirements: Policy 1.11 should require all private and non-profit facilities to be replaced if removed. It also implies on Page 16 that only people who can afford would have access to recreation.*

Department Response

We have modified the definition section of the document to further define and clarify recreation. This definition also distinguishes between active and passive recreation. We have added the term recreation to the language throughout the ROSE including Policy 1.4, Objective 2, and Objective 6. Policy 1.3 already captures preservation of recreation if it's referring to outdoor recreation. In response to the comments regarding existing recreational facilities, existing recreational facilities are an extremely valuable asset to our parks and open space system. Recreational programs should address the community needs and therefore they may change based on the changing needs of the community as established in Policy 2.2 and 2.3. The City needs to provide some flexibility to allow such dynamic character of the recreational programs. Therefore, the criteria that regulate preservation of open space land (1.3) will not be suitable for preserving recreational programs and facilities.

While distinction between active and passive recreation has been made in the definition of recreation, staff believes that we cannot apply such a distinction to specific types of open spaces. Recreation, both active and passive, can occur on a living street or in a private open space. One cannot say that active recreation can only occur on a playing field. But policies 2.2 and 2.3 assert that a balanced recreation system should be provided and promoted.

Per your suggestion, language was added to the definition of recreation to discuss how RPD, per the charter, is required to assess recreation. While the ROSE discusses both recreation and open space throughout the document, policies 2.2 and 2.3 both specially focus on improvements to recreational facilities and program. Staff disagrees with the comments that recreation was not a clear directive in the outreach process. Throughout

the past seven years, several stakeholders of both recreation and open space were involved in the process of developing the policies in the ROSE. San Francisco, similar to other dense cities in the nation, maintains a skewed rate of open space or recreation per person compared to the standard averages provided by national recreation and parks organizations. Recognizing this challenge, the ROSE uses a different methodology to evaluate the need for open space and recreation. The high needs area analysis incorporates a walkability analysis which identifies areas in the City that are not located within a walking distance to active recreational facilities, playgrounds, as well as tranquil spaces. The Department strongly believes that such access analysis better suits the urban character of San Francisco compared to a standard and universal metric for recreational facilities that is created for use of different types of cities and jurisdictions.

We have amended Policy 1.4 to place further emphasis on the need for maintenance, adding language that the City should continue to employ well trained staff, such as gardeners and arborists and other trades people, and should seek alternative maintenance strategies to ensure better maintenance of parks and recreational facilities.

Regarding your comment on user surveys, these tools are just one amongst many that RPD uses to evaluate user needs and the quality of facilities, and are aimed at identifying issues raised by current park users. In addition to RPD assessments, reports by the Department of Children, Youth and Families (DCYF) as well as the Controller's Office help identify community recreation needs. Such surveys can inform decisions such as: help determine the facilities that need renovations, or facilities that need alternative programming, and will not result in removal or demolition facilities. Such data can also be used to further customize the high needs area analysis. These user surveys would not by any means aim to identify facilities that "residents don't want."

Regarding your comment on Policy 1.11, we understand your concerns about the preservation of private and non-profit recreational facilities. We believe that the policy as written provides a clear description of the important role such facilities may play, and calls for the City to support them when possible. However, since these facilities are private properties, including replacement requirements or explicit protections for them would require additional legislation, and is beyond the scope of the ROSE. Also, Policy 1.11 encourages private development to provide basic recreational facilities, and if feasible make such facilities available to low income households. There are many policies that call for improvements to existing recreational facilities and providing additional recreation programs (1.2, 1.4, 2.2, 2.3). Policy 1.11 only supplements these main policies around city provision of recreation in that it would encourage private development to help address some of the basic needs for recreation where possible. It is unclear why the concerns regarding affordability are raised.

High Needs Areas

Comment highlights

- *ROSE 2013 weakens the City Park Code definition of high needs areas by expanding the definition of "high needs" to include future growth and areas with distribution deficiencies. This would de-emphasize expenditure in areas with high density, children and youth density, and density of low income households. Mission bay is not a high needs area as shown in Map 6. Future growth areas should be in a different map.*
- *Children are left out from the high needs area map. Policy 2.3, page 22 needs to be consistent with DCYF in terms of needs for youth (0-17)"*

- *ROSE must make explicit priorities as follows: priority one: high needs areas as defined in the Park Code; priority two: underserved and neglected areas in need but are not necessarily dense and only very low income; priority three: areas of growth which are deficient in recreation and open space.*
- *ROSE should emphasize equalization of design, maintenance, and quality of all recreation and open spaces and distribute funding and services as a citywide holistic policy.*

Department Response

The statement that the definition of high needs areas is expanded from the one in the park code is inaccurate. The City's Park Code refers to the Recreation and Open Space Element to define High Needs Areas (Section 13.02 of the Park Code). The 1986 ROSE conducted the high needs analysis based on the following factors: population density, low income households, children, youth, and seniors' density, along with parks service areas. The ROSE update has incorporated these same factors (service areas and walkability maps present the same information). In addition, since there has been significant rezoning in the City within the past decade, the Department acknowledged the need to plan for open space for the future population as well and therefore added an additional factor regarding growth to the six other factors that explain the existing need. The one factor regarding growth areas does not, by any means, downplay the importance of the open space needs of the existing population.

The Department appreciated the comment about how growth in the City is not limited to the Area Plans. Therefore, instead of using Area Plans as a proxy for growth areas, the Department used another factor: Land Use Allocations. Land Use Allocation distributes projected housing and employment growth as determined by the Association of Bay Area Governments to 981 Traffic Analysis Zones (TAZ). These zones vary in size, from a block around downtown to several blocks in more outlying areas. The allocation of TAZ-specific growth is based on the current development pipeline (development projects under construction, approved or under review) and an estimate of additional development potential for each TAZ. Therefore Land Use Allocation distributes the projected growth more evenly throughout the City. Based on the results of this analysis, staff used the additional population in each TAZ to measure the open space needs of the future population.

The Department also used the Census 2010 data at block group level as a data source across all maps as a closer look at the American Community Survey data used in the 2013 draft indicated this source as inaccurate at the small geographic unit- such as block group data. While the Census 2010 data represents actual counts, the American Community Survey data is based on sampling and estimates.

Furthermore, the Department also appreciated the concerns about showing areas such as Mission Bay as high needs areas. Certain areas in the City such as Mission Bay, Hunters Point, and Treasure Island, per the 2010 census, had little or no population and little to no access to open spaces. However, these areas include Master Plans for development which include site specific parks and open spaces. These areas were shown as high needs areas in the 2013 draft ROSE mostly because they were found deficient in access to open spaces (and not in the other demographic needs). However, if and when the population planned for these sites materializes (per their respective Master Plans), the planned open spaces will also be built. Therefore, staff decided to show the future location of these open spaces as existing open spaces in the walkability analysis (See Map 4c). Making this modification recognizes the extensive new open spaces that will be funded and built as part of these new developments.

The High Needs Area analysis guides decision makers when making decisions around acquisition or major renovations. The areas identified as high needs should all receive priority for funding for acquisition and renovation of parks. Further prioritizing among these identified high needs areas would remain outside the scope of the ROSE and fall under financial opportunities and challenges as well as availability of land on a case-by-case basis. This analysis is a first step towards the goal of an equal distribution of parks and recreational facilities within the City both geographically and demographically. Per the Park Code (Section 13.02), the Recreation and Parks Department should prioritize their acquisitions within the high needs areas defined in the ROSE as well as acquisition of significant natural areas that are not otherwise protected from degradation or development.

Public Private Partnerships and Commercialization of Parks

Comment highlights

- *Different policies call for activation for underutilized areas and this policy could result in the commercialization of parks.*
- *Policy 6.1 and 1.3 (part 2) elevates role of vendors in parks to partners. Site specific revenue generation indicates consumerism in parks. Having vendors is an operational issue and requires public process.*
- *Public- private partnerships threaten parks independence. Nothing in the ROSE precludes private de facto ownership or control of public lands and facilities as a result of PPPs. ROSE should create maximum protective criteria against PPPs to ensure accountability to the public. PPPs might come with hidden agendas, lack of transparency, and access or usage restriction.*
- *Objective 6 fails to insist upon criteria to 1) guarantee public control over public space, 2) insist upon third party accountability to the public or 3) transparency in communication and transactions.*
- *PIDS- Three potential problems of PID:1) add to disparity between neighborhoods (more affluent neighborhoods will have better parks), 2) encourage the status quo in city budget priorities, 3) undermines city's responsibilities to maintain all parks equally.*
- *ROSE policies encourage the pay to play concept. Policy 1.11 by asking developers to create affordable recreation facilities for low income families which would not work.*

Department Response

Staff understands and appreciates the concern about maintaining parks as public resources. The challenge around funding these resources has been also recognized as a major concern within the past decade, as parks have been receiving less and less support from the City's General Fund. The intention of Objective 6 of this policy document is to address this funding challenge without compromising our parks and recreation as public resources.

We worked with the comment group to ensure this language addresses the concerns and fears around commercialization of our parks. While the group acknowledges the improvement of this language, more concerns were raised. We have modified the language again to address the topics raised in your letter: 1) added statement about the City's responsibility to fund parks and open spaces as public resources; and 2) added another criterion when developing public private partnerships to maintain transparency and accountability to the

public. We have also applied modifications to the text to remove the impression of vendors as partners in parks. The Department believes that this Policy as modified would bring maximum protective criteria -- within the realm of a policy document-- for such partnerships to serve the public.

The comment group raises a number of concerns about equity issues as they relate to PIDs. The idea of Parks Improvement Districts has been listed as one of the many different innovative approaches to address parks funding challenges. The maintenance of parks was a key concern raised throughout the public process for the ROSE and staff feels all avenues for maintenance should be explored. Staff feels it would be important to pilot these ideas that are extensive throughout the country in the City to determine if this is a feasible funding mechanism. Finally, Policy 1.11 again aims to tap into private resources where possible to provide affordable recreation for low income families. This would not relieve the City of its obligation to provide recreational and open space resources affordable to the public. It would only encourage the private sector to also consider providing affordable recreation to the public.

Golden Gate Park Master Plan

Comment highlights

- *The 1998 GGMP is a recent document adopted pursuant to 10 years of community work. Opening up the document for an update would expose the park to new buildings and revenue generating features.*
- *Suggests edits to Policy 1.6: "Replace starting point with guidelines" and remove "which ones remain relevant"*
- *Policy 1.6 also calls for paving the southern edge of the park.*
- *The ROSE should emphasize the need for better maintenance and protecting the park from high-attendance events, and protecting its naturalistic character.*

Department Response

The Golden Gate Park Master Plan is the result of an extensive city and community collaboration. The result is a very beloved Master Plan for one of the city's most beloved open spaces. The ROSE in no way suggests that any process to review the Golden Gate Park Master Plan should be done unilaterally by the city or should necessarily even be completed. However, the ROSE is a 20 year document and the current Golden Gate Master Plan is now a 16 year old document. Life of policy documents usually span from 20 to 25 years. This ROSE policy calls for improvements to GGP and, per your suggestion, the language has been modified to make it clear that any potential changes to the Master Plan should happen with community collaboration.

Policy 1.6 does not call for paving the southern edge of the park. It is unclear why this concern is raised. The only possible misunderstanding is that the ROSE does call for improving pedestrian access and entrances along the southern edge. Not having access along a very long stretch of Golden Gate Park was a concern raised by a number of people, however, any changes to Golden Gate Park would obviously require extensive community planning. Your other suggested edits to policy 1.6 have been applied.

Regarding large events in GGP and also other parks, per your suggestion, Policy 1.1 has been modified to discuss large events in parks, acknowledging the fact that the draw of these events sometimes provides the first

exposure to the City's open space resources. This policy also calls for evaluating the impacts of these events on open spaces and their surrounding neighborhoods.

Biodiversity and Natural Areas Management

Comment highlights

- *Policy 4.1 does a good job defining local biodiversity as both native and non-native but policy 4.2 skews this definition to include a preference for native versus non-native plants. Stronger emphasis is needed for a balanced view.*
- *Policy 4.2 in this 2013 ROSE constitutes a major "land grab" for the RPD's highly controversial Natural Areas Program (NAP).*
- *Natural does not mean "native" only, it means areas with plants and trees and no buildings and they should be accessible, safe, well-maintained, and green and filled with growing things.*
- *Definition of Sustainability: environmentally sustainable plants need minimum irrigation AND minimum use of herbicides.*
- *ROSE contains to protection for public access to and recreational use of open space in natural areas.*
- *inaccurate statement: "Yet, San Francisco continues to lose species diversity due to isolation and fragmentation of habitats" Policy 4.1, page 42*

Department Response

Objective 4 of the ROSE focuses on preserving and enhancing to local biodiversity and encouraging sustainability throughout our open space and recreational system. Staff disagrees that that one policy (4.2) weighs more heavily than another policy (4.1). All policies have the same weight and are equal in importance. We understand the concern and tried to further clarify the issues with minor modifications to the language of these two policies.

We have modified policy 4.1 to further emphasize the need to consider the ultimate health and resiliency of ecosystems in a holistic way, which could include both native and non-native plants. The ROSE acknowledges the contribution that non-native species can play in promoting local biodiversity. Butterfly bush (native to China) is a good example. Many species of non-native plants can serve local wildlife. Many species do not do much for wildlife habitat, but are enjoyed by humans and are not invasive. Only a small percentage of non-native species of plants are invasive. It is unclear how the ROSE could be used to "justify destroying acres of existing non-native habitat for no reason other than that it is non-native." The ROSE makes it clear that both native and non-native species are valuable. Policy 4.1 states "In addition, parks and open spaces in San Francisco include both native and non-native species, both of which contribute to local biodiversity. The City should employ appropriate management practices, including controlling invasive species, to maintain a healthy and resilient ecosystem which preserves and protects plant and wildlife habitat.

We have also modified Policy 4.3 to emphasize that non-native drought-tolerant plants can also be used when restoring local biodiversity. We have expanded Policy 4.3 and added an additional Policy 4.4 focused on environmentally sustainable practices in construction, renovation, management and maintenance of open space and recreation facilities, including sustainable pest management practices and use of pesticides.

Public access cannot always be guaranteed in all natural areas, in order to restore and protect their natural resource values. Policy 4.2 outlines a management approach governing access and appropriate use of protected natural areas that balances biodiversity and ecosystem health with other factors, such as public use. Also, Access to specific properties within the natural areas programs can be addressed more appropriately through the Significant Natural Resources Area Program within RPD. Further, Policy 2.10 calls for the City to provide access for recreational uses at PUC reservoirs and other sites, when appropriate.

With regard to your comment around inaccuracy of the statements about San Francisco losing species diversity; two resources that include historical inventory of plant species in the City supporting this claim are:

A Flora of San Francisco, 1958 by John Thomas Howell

The San Francisco Plant Checklist: <http://www.wood-biological.com/san-francisco-plant-checklist/>

These resources were provided by SF Environment and are in active use for native plant restoration efforts.

Other Comments

Comment highlights

- *Discourage large events: Large events in golden gate park and McLaren Park prevent park use before, during, and after those events and adversely affect the natural environment. ROSE should recommend finding other venues for such events. (policy 1.5 and 1.6)*
- *Art in parks: Policy 1.7 includes the odd concept that artwork is primarily to parkland. ROSE should not discuss art and parks should be protected from the built environment. Other typos and small changes: see the last two pages of the comments*
- Other observations

Department Response

Policy 1.1 has been modified to discuss large events in parks, acknowledging the fact that the draw of these events sometimes provides the first exposure to the City's open space resources. This policy also calls for evaluating the impacts of these events on open spaces and their surrounding neighborhoods.

The notion of art in parks and public space has been the City's policy for decades. As mentioned in the policy language, the City law requires art in all public projects. This policy acknowledges this law along with the public's interest in enjoying art in public space and emphasizes the need to ensure such art is publicly accessible and visible.

Staff also reviewed the comments provided under Other Observations section of your letter. Objective 1, Policy 1.2 on page 9; Objective 4, Policy 4.1 on page 42 (second item); and Objective 4, Policy 4.2 on page 43 have been addressed. Staff did not find any changes necessary regarding these comments.

ROSE WORKING GROUP COMBINED COMMENT PACKET

To: Board of Supervisors
Planning Commission
Historic Preservation Commission
Planning Commission Secretary
Planning Staff

From: ROSE Working Group/Comment Group

Date: February 10, 2013

Subject: Combined Packet of Comments

Since December 15, 2013, the ROSE Working Group has submitted a set of letters commenting on the 2013 Revised Draft ROSE. To make it simpler to access those various comment letters, we have combined them into one pdf file.

We are always available to discuss any of these issues or to provide more background information.

Thank you for your consideration.

Sincerely,

The ROSE Working Group

Judy Berkowitz
Linda D'Avirro
Rose Hilson
Katherine Howard
Denis Mosgofian
Kirstine Schaeffer
Sally Stephens
Howard Wong

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ROSE COMMENT GROUP

Re 2013 revised Draft ROSE; Highlight No. 1 January 13, 2014

"High Needs"

Dear Commissioners,

Following up on our Dec. 15, 2013 submission and public testimony, we wish to provide further background information and suggested language changes for the area of "HIGH NEEDS" in the Revised Draft 2013 ROSE.

Instead of taking care of the people who reside here already, the 2013 Revised Draft ROSE is prioritizing future demographic needs, which in effect downgrades the needs of residents in current traditionally high needs areas, because, frankly, dense areas may be harder to provide for.

In his September 17, 2013 Audit of PROSAC and the Open Space Acquisition Fund Harvey Rose criticized RPD for expanding the High Needs category "to allow RPD to give highest priority to (acquiring) properties in areas other than high needs, in contradiction of the priorities in the City Park Code." In recent years five properties were acquired by RPD and none were in "High Needs" areas. Last year, a 6th property in Noe Valley was acquired as "high needs" by adding the criterion of "walkability". The only actual acquisition in a "high needs" area was [name of property] purchased with Impact Fees, not Acquisition Funds.

Unfortunately, **in Objective 2, Policy 2.1**, the 2013 Revised Draft ROSE **weakens** the Park Code definition of "High Needs" by mimicking exactly what Harvey Rose criticized RPD for doing. That is, stretching the boundaries of "high needs" to include "available funding sources that may be leveraged" and areas with distribution deficiencies that are neither dense, low income, nor with a high percentage of children, youth and seniors.

The ROSE must guide future acquisitions by prioritizing the original Park Code definition, and then adding other needs language and corresponding Maps that correspond to "needs" categories 2 & 3 such as we propose below.

The ROSE must make explicit distinctions between the following areas, prioritizing them as follows:

1. "High needs" areas that are defined in the Park Code as the "conglomeration of high density, with high percentage of children, youth, seniors and low income households." These areas are most pressing. These people cannot wait.
2. Under-served and neglected areas that are in need, but are not necessarily dense and only very low income. These areas are next most pressing
3. Areas of growth which are deficient in open space, recreation and parks. These last areas are the areas of current and recent development which are not low income, not dense with kids, not dense with youth and not dense with seniors. These areas should not be prioritized in the ROSE over long-existing neighborhood needs, or the disparity between various neighborhoods will

continue to grow. These areas can be provided for over time.

4. **Map 06** labels Mission Bay as high needs, but it is not dense, poor or full of children, youth and seniors and so it must be removed from this map.

The 2013 ROSE should require a strong leveling of the social playing field. More than just acquisition and creation of parks, recreation and open space, the ROSE needs to urge equal quality of design, and maintenance for all neighborhood parks, recreation and open space. To achieve such standards, the ROSE needs to urge fair distributing of funding and services as a citywide policy.

Thank you for your attention and consideration,

ROSE Comment Group

Denis Mosgofian, Kris Schaeffer, Sally Stephens, Katherine Howard,
Howard Wong, Judy Berkowitz, Linda D'Avirro, Rose Hilson

Cc: Sue Exline, Kimia Haddadan, John Raiham, Jonas Ionin
Board of Supervisors

ROSE COMMENT GROUP

Re: 2013 Revised Draft ROSE; Highlight No. 2, January 16, 2014

Biodiversity

Dear Commissioners,

Following up on our Dec. 15, 2013 submission and public testimony, we wish to provide further background information and suggested changes with regard to biodiversity and “natural areas” in the 2013 Revised Draft ROSE.

The issue of native vs. non-native plants illustrates the need for language in the ROSE to be as clear as possible. Policy 2.13 in the 1986 ROSE mentions the need to preserve remnants of San Francisco’s original natural landscape. That seems fairly clear. Yet advocates for the Recreation and Park Department’s Natural Areas Program (RPD NAP) have taken this suggestion to preserve remnants of existing native habitat and claim it actually gives them a mandate to destroy acres of existing non-native habitat to create new native habitat where none has existed for centuries. Policy 2.13 is being used to justify drastic changes in many RPD-controlled parks, e.g., to cut down 18,500 healthy trees (most in Sharp Park) simply because they are not native. It turns out the language wasn’t as clear as it seemed.

That is why we are so concerned with the language throughout Objective 4. The ROSE does not exist in a vacuum. Its language will be used by people to push pet policies just as Policy 2.13 in the 1986 ROSE was used. What is said and how it is said matters. We want to ensure that the 2013 Revised Draft ROSE makes clear that biodiversity includes BOTH native and non-native species. The definition of what is “native” is somewhat arbitrary – can a plant that has been here for over 150 years, but was not here when European colonists first arrived in the 1700s really be considered “non-native?” While Policy 4.1 defines local biodiversity as including both native and non-native species, we remain concerned that the tone of the rest of Objective 4 weighs more heavily in favor of native species and native habitats over existing non-native habitats, especially in its repeated references to “restoring” habitat. We want a stronger statement in the ROSE that local biodiversity gives both native and non-native species equal value for humans and habitat, not just that it “includes” both. Without this clarification, we are concerned that some will use the 2013 Revised Draft ROSE to justify destroying acres of existing non-native habitat for no reason other than that it is non-native, as long as a they leave a few non-natives in the area.

Similarly, we would like to see the 2013 Revised Draft ROSE include the need to balance the benefits of restoring “native” habitat in any park with the negative ecological impacts of destroying existing non-native habitat on ecosystem services (e.g., carbon sequestration, wind reduction, etc.), and on the animals, insects, and reptiles currently living there. This balance must be used when environmental analyses are performed in the City and should be part of the ROSE. “Natural” does not mean “native-only.”

The 2013 Draft ROSE shows improvement over the 2011 Draft. However, it’s not quite finished yet. We urge you to make the additional changes to the ROSE that we suggested in our

December 15, 2013 letter. The ROSE is important enough to take the time needed to make it right.

Thank you for your attention and consideration.

The ROSE Comment Group

Sally Stephens, Denis Mosgofian, Kris Schaeffer, Katherine Howard, Howard Wong, Judy Berkowitz, Linda D'Avirro, Rose Hilson

Cc: Sue Exline, Kimia Haddadan, John Raiham, Jonas Ionin, Board of Supervisors

ROSE COMMENT GROUP

Re: 2013 Revised Draft ROSE; Highlight No. 3, January 18, 2014

Policy 1.3 - Preserve Existing Open Space Policy 1.6 - Improvement of Golden Gate Park

Dear Commissioners,

We would like to thank the Planning Staff for incorporating many of our prior suggestions regarding preserving open space. Following up on the Rose Comment Group's December 15, 2013 submission letter and public testimony, we wish to provide further background and some suggested changes with regard to building restrictions in parks in general and issues related to Golden Gate Park in particular.

Firstly, the 1986 ROSE clearly limits the amount of building that can take place in our irreplaceable parks and open spaces:

*"The City's policy should be made clear: where new recreation and cultural buildings are needed they should be located **outside of existing parks and playgrounds**. When new indoor facilities are needed, the City should allocate funds for land acquisition as well as for construction. . . . San Franciscans . . . should not be put in the position of developing indoor facilities at the expense of valuable outdoor open space and **the amount of outdoor open space in parks and playgrounds should not have to be reduced in order to avoid buying land for new indoor recreation or cultural facilities.**" (Policy 2.2, emphasis added.)*

Unfortunately, the Draft 2013 ROSE offers up justifications for building in our parks. Policy 1.3 encourages "cultural" buildings and other built features in our parks. The term "cultural" is not defined and could apply to just about any building project put forth by an enthusiastic and powerful special interest group. Once one building went up, more would certainly follow. San Francisco as a City will become only more dense. To protect our parks as open space for future generations, the 2013 Draft ROSE should have strong restrictions against new buildings in our parks.

Secondly, the ROSE has incorporated good language on preserving Golden Gate Park's historic value for passive and active recreation within a naturalistic landscape. However, we are concerned that the ROSE's proposal to open up the recent 1998 Golden Gate Park Master Plan to changes could lead to undermining the Master Plan.

We therefore recommend the following changes to the Draft 2013 ROSE:

Policy 1.3, Section 2: **Delete** from "Culture is also ..." through the end of Section 2. **Replace** with the 1986 ROSE language: *"When new indoor facilities are needed, the City shall allocate funds for land acquisition as well as for construction. San Franciscans must not be put in the position of developing indoor facilities at the expense of valuable outdoor open space, and the amount of outdoor open space in parks and playgrounds must not have to be reduced in order to*

avoid buying land for new indoor recreation or cultural facilities."

Policy 1.6: Introductory paragraph: **replace** 'The Master Plan provides a starting point' with 'The Master Plan provides *guidelines* . . . "

Policy 1.6, Section 1: **delete** "and which ones remain relevant."

Policy 1.6: **Add** "Section 4. *All proposals must be evaluated within and conform to the design intent of the Park and protect the landscape as described in the '1998 Golden Gate Park Master Plan,' Objective II, Policy A: Landscape Preservation and Renewal.*"

Thank you for your attention and consideration.

The ROSE Comment Group

Katherine Howard, Sally Stephens, Denis Mosgofian, Kris Schaeffer, Howard Wong, Judy Berkowitz, Linda D'Avirro, Rose Hilson

Cc: Sue Exline, Kimia Haddadan, John Raiham, Jonas Ionin, Board of Supervisors

ROSE COMMENT GROUP

Re: 2013 Revised Draft ROSE; Highlight No. 4, January 22, 2014

Recreation

Dear Commissioners,

There is not enough **recreation** in the Recreation and Open Space Element. We appreciate your consideration of these issues.

If we use recreation standards to measure recreation, we are not doing well.

On page 2, Introduction, the 2013 Draft ROSE asks “How are we doing in providing open space?” and answers that “San Francisco has well over 3,400 acres of open space which puts San Francisco among the top five cities in the country in terms of park land per resident.”

Acreage is not a measure of recreation. Recreation itself should be measured by a recreational standard such as NARPA (National Association of Recreation and Parks). NARPA evaluates recreation facilities and fields per resident as a measure of the adequacy of recreation. When we use a recreational standard to measure our recreation, San Francisco is not doing well. For example, for a city of our size we should have 40 swimming pools; we have 9. We should have 400 tennis courts; we have 144.

The 2013 ROSE should use a quantifiable measure and benchmark for recreation, such as NARPA standards, not only to determine how well we are doing in providing recreation but also for setting goals for acquisition of recreation facilities and fields. If so, there would be a call to action to expand the number of recreational facilities to meet NARPA standards, and to provide regularly scheduled capital upkeep that is monitored each year.

Given the drastic shortfall of recreation in San Francisco, we recommend that recreation be added to these sections of the ROSE:

Policy 1.3. Preserve existing **recreation and** open space by restricting its conversation to other uses and limiting encroachment from other uses, assuring no loss of quantity or quality of **recreation and** open space.

Policy 1.4. Maintain and repair **recreation and** open spaces to modern maintenance standards.

Objective 2: Increase **recreation and** open space to meet the long-term of the City and Bay Region.

Objective 6 so that it reads: “Secure long-term resources and management for **recreation**, open space acquisition, operations and maintenance.”

Stronger protection for recreation facilities.

We need stronger protection for recreation facilities. The current draft of the ROSE does not adequately protect the current recreational facilities, fields, and courts.

We need stronger protection for recreation facilities. The current draft of the ROSE does not adequately protect the current recreational facilities, fields, and courts. The language in Policy 1.11 is not strong enough to prevent the demolition of recreational facilities without replacement, nor does it provide a guide for prioritizing recreation over other uses.

We suggest that Policy 1.11, page 16, paragraph 2, be changed as follows:

Some ~~private and~~-non-profit recreational facilities act in a quasi-public manner. These may provide free or low-cost community access, supplementing existing City programs in underserved communities for active education, sports and recreational activities. Examples include the YMCA, Boys and Girls Clubs, and other community-based organizations. These types of facilities should be supported when they serve San Francisco residents, and, if removed, ~~the loss of recreational space they provide should be considered.~~ [the City should replace them in kind, nearby, and affordable.](#)

How to do you know what people want? No usage may mean not usable instead of not wanted.

Don't use "usage studies and intercept surveys" to determine needs when the recreational facility is not useable.

Two policies in the 2013 Rose state that "recreational needs will be determined by usage."

Policy 1.2, page 9, states, "The City should perform user studies and collect usage data to assess which of the existing recreation and open spaces are the most highly used so that those spaces may be targeted for renovation and improvement." **Policy 5.1**, page 44, says "Use intercept surveys, which provide observational park usage, facility-based input to provide neighborhood feedback on recreation programming." However, having no one on unusable fields and courts does not indicate that residents don't want them. The ROSE needs to have a policy that creates stronger outreach, communication, and lead time when planning decisions include a recreational asset.

Lastly, the ROSE should urge a comprehensive all-City, all-stakeholders survey of recreational needs every ten years. No further decisions should be made about demolition of recreational facilities until the City has the results of such a survey.

Sincerely,

The ROSE Comment Group

Kris Schaeffer, Katherine Howard, Sally Stephens, Denis Mosgofian, Howard Wong, Judy Berkowitz, Linda D'Avirro, Rose Hilson

Cc: Sue Exline, Kimia Haddadan, John Rahaim, Jonas Ionin, Board of Supervisors

ROSE COMMENT GROUP

Re 2013 revised Draft ROSE; Highlight No. 5 January 24, 2014

Public-Private-Partnerships & Park Improvement Districts

We urge that you reconsider the emphasis planners placed in the 2013 Revised Draft ROSE on Public Private Partnerships (3P), and the advocacy of "Park Improvement Districts".

Public Private Partnerships: The 2013 ROSE should insist on maximum protective criteria in public private partnerships to guard the public interest in, investment in, control of and ownership of our public spaces.

In Objective 6 and throughout the 2013 Revised Draft, the drafters urge reliance on Public-Private Partnerships (PPP), but fail to insist upon specific criteria to (1) guarantee public control over public space, (2) insist upon third party accountability to the public or (3) insist upon transparency in the communications and transactions between the City and private entities. Currently, in such PPP partnerships, for example, the third party is not subject to Sunshine Law requirements but they should be.

Contrary to what the planners have claimed, the 2013 Revised Draft ROSE does not dispel the threat of encouraging privatization. The ROSE must use the current updating as an opportunity to insist upon the above such conditions for PPP relationships to guide their application and ensure the public retains genuine control of parks and open space and can see what is going on.

ROSE should advise that Public-private partnerships should not be encouraged simply because they offer local government a means of shifting a public obligation to a private entity. A private entity's interests may or may not be self-serving, but they are not accountable to the public. Private entities are not subject to revealing their decision-making process and the outside influences on that process. The 2013 ROSE should insist on maximum protective criteria to protect the public interest.

Rather than encouraging public-private partnerships as a response to budget shortfalls, the ROSE should direct the City to prioritize sufficient public resources for maintaining and increasing our open space and the park and recreation system. It should insist on a guarantee of public access, usage, and control.

For these reasons, PPP's should not be encouraged in the ROSE.

We are also concerned about "Park Improvement Districts"(PID) which the planners advocate in the 2013 Draft ROSE (Objective 6, Policy 6.1).

PID's may have the following negative consequences:

1) . PID's will add to the disparity between neighborhoods in the quality of open space and parks. Areas with well established businesses and well-heeled property owners would be able to

raise funding resources to encourage further public investment in their particular area. However, other areas without such resources would languish further and further behind

- 2) PID's would encourage the status quo in City budget priorities. We would like to see current budget priorities revised, with greater public expenditure for parks, open space and recreation.
- 3) PID's could undermine the City's responsibility to properly maintain the quality of **all** our parks and open space, regardless of the economic status of each area. Before PIDs are set up, there must be standards for funding our parks all over San Francisco, with appropriate minimum funding established for equitable operational support and improvements for all neighborhoods. ROSE must provide guidance by insisting on these standards being established before PID's are approved and done in a transparent public process involving all residents.
- 4) PID's are a form of pay-to-play. Is that really something the ROSE should encourage?

For these reasons, we believe PID's do not belong in the envisioning guide ROSE.

Respectfully submitted,

The ROSE Comment Group

Denis Mosgofian, Kris Schaeffer, Katherine Howard, Sally Stephens, Howard Wong, Judy Berkowitz, Linda D'Avirro, Rose Hilson

Cc: Sue Exline, Kimia Haddadan, John Rahaim, Jonas Ionin, Board of Supervisors

December 15, 2013

Mr. John Rahaim
Director of Planning
San Francisco Planning Department
c/o 1650 Mission St, Suite 400
San Francisco, CA 94103-2414
Re: 2013 Revised Draft ROSE

Dear Director Rahaim,

EXECUTIVE SUMMARY

The Revised Draft November 2013 ROSE [2013 ROSE] has incorporated many beneficial changes to the Draft 2009 ROSE that were proposed by the ROSE Working Group. We appreciate the time and effort that the Planning Department has gone to and the many changes from the first version shared with the public. However, we still have serious concerns with some language and concepts embodied in the 2013 ROSE. Certain policy sections should be further modified to ensure protection of our parkland for future generations. These sections include needed language changes on open space and parkland protection, high needs, social inequity, underserved and neglected areas, the place of children and youths, public-private partnerships, the place of recreation, and biodiversity. The following contains a further explanation of these policy points and specific recommendations for modification to the 2013 ROSE. We look forward to discussing these issues with you and to continuing to work with the Planning Department on producing an excellent document that will guide the City in its choices for the use, protection, and management of our parks and open space for the next 25 years.

ROSE WORKING GROUP - BACKGROUND

The ROSE Working Group was initiated by the Planning Department at PROSAC in 2011. Two PROSAC volunteers were asked to create a larger Comment Group to review all comments on the 2009 Draft ROSE in order to find consensus on as many points of view as possible. The Rose Working Group was advised that we would help save the Planning Department staff time and money, as the grant money was running out. The Group grew to represent a large collection of San Francisco parks and recreation organizations and coalitions, representing most areas of the City.

The ROSE Working Group met weekly for four months, and on December 12, 2011 presented the Planning Department with a side-by-side document of 90 pages, comparing paragraph by paragraph our proposed consensus changes adjacent to the same paragraphs in the 2009 Draft ROSE. This was done so that the proposed changes would be easily tracked and understandable as to why each revision was proposed.

Following our submission, we had a face-to-face meeting at which Planning Staff said that they would be in touch with us, and that there would be joint meetings with the Recreation and Park Department (RPD) and the Natural Areas Program (NAP).

We did not hear anything from Planning Staff until the stakeholders meeting on Nov. 19, 2013, at which meeting Staff announced , "This is the final draft. We are only looking for typos. We are not looking at policy."

At that meeting, Planning had on display the binder of the public comments they had received on the 2009 Draft ROSE. Our side by side submission was not there. Rather we saw our work product without the side-by-side comparison , a much less useful file.

CURRENT DRAFT -- 2013 ROSE

The current draft has indeed incorporated a number of constructive revisions. It is a much better document than the 2009 Draft. However, the important thrust of the consensus we developed from broad input was not used in some areas. For example the ROSE Working Group proposed the language below for Policy 2.3, that deals with the themes of inequity, high needs, recreation, open space, and proper notification and broad outreach. We believe the import of our submission was missed. Other concerns with the 2013 ROSE, and recommendations for revisions, are detailed below.

POLICY 2.3 Proposed by the ROSE Comment Group, Dec. 12, 2011

Develop new recreational programs and service level goals to ensure programs and facilities meet neighborhood and community-surveyed needs.

The SF RPD shall provide services based on what the various neighborhood residents want. Programming and staffing shall be driven by resident needs, not revenue. . . . The SF RPD shall reach out to community residents, especially in low- and moderate-income neighborhoods, through physical contact, posted notices in high pedestrian traffic locations, and the establishment of electronic communication.

The chief metric by which SF RPD shall judge its service is by the extent the Department meets community needs in all areas of the City, but especially the needs in low- and moderate-income neighborhoods. Further, SF RPD shall ensure free access to community clubhouses for meetings and community gatherings and affordable programming.

To bolster this direction, the City shall direct the Park and Recreation Open Space Advisory Committee (PROSAC) to develop a comprehensive public process for establishing community needs-driven programming and staffing for clubhouses and other recreation facilities.

The following areas in the 2013 ROSE need further work and should be addressed before the 2013 ROSE is presented for approval.

OPEN SPACE AND PARKLAND PROTECTION

Open space and parkland protections need to be expanded in the 2013 ROSE.

As San Francisco becomes more heavily populated, the need for protected open spaces, where people and nature can flourish side by side, will only grow. It is especially important for our children. Nature Deficit Disorder is now prevalent in our society. If children do not get out into nature and learn to explore it on their own, they will grow up without an understanding of the natural world. Teaching young people to appreciate the value of nature is an important role that our parks can and must play.

Some sections of the 2013 ROSE open up our parks to inappropriate development and should be reconsidered. For example, the 2013 ROSE:

Opens up our parklands to building creep: The 1986 ROSE clearly states that new recreation and cultural buildings "should be located outside of existing parks and playgrounds." (ROSE 1986, policy 2.2). The Draft 2013 ROSE offers up potential justifications for building in our parks. (Policy 1.3) For example, one of these is for building "cultural" buildings in our parks. This term is not clearly defined. If buildings are allowed, then rationales can always be found for them, and politicians have difficulty resisting the cause of the moment. Therefore, any group or cause would be able to claim a "cultural" need for a building -- and once one building went up, more would follow. Building creep on public parklands sets the City on a dangerous course. That is why the ROSE should return to the original 1986 ROSE strictures against new buildings in our parks

Policy 1.3's last paragraph allows the use of temporary structures in our parks, exempt from various requirements. Under this policy, any public parkland could be taken over for a long period with the loss of open space. The 2013 ROSE should direct that such proposals be announced, involve public input and decision making, and be approved by the Board of Supervisors following public hearings. Even if those procedures are followed, temporary structures should only be permitted for very short periods of time.

Emphasizes the "city" experience over enjoyment of parkland for its own sake: The frequent use of such words as "activation," and "underutilized," point to an emphasis on our parks becoming another busy, urban experience -- more buildings, more crowds, more planned events, more organized activities, and more commercialization. Many of our parks just need better maintenance. Magnificent places such as Ocean Beach are already heavily used by San Franciscans who go to the beach to enjoy the lack of urban incursions into the shoreline. Ocean Beach becomes "activated" when the sun comes out! (Policy 1.5 and other sections.)

Encourages commercialization of our parks: Our parks are viewed by at least one park commissioner as opportunities for "site specific revenue generation," that is, the chance for the City to promote consumerism. Part of the consumer-oriented experience is the attitude that parks cannot be enjoyed without extensive commercial amenities. In the 2013 ROSE, vendors are elevated to the level of "partners," giving them undue influence on how our parkland is used. (Policy 6.1) Vendor buildings (kiosks) are encouraged. (Policy 1.3, section 2) However, vendors are not community park advocates; vendors run commercial ventures that are in business to make money or support a staff. The presence of vendors is an operational issue that should be given a great deal of public outreach and

consideration (without regard to the testimony from all of the suppliers who make a profit off of our parks), and should be not included in this important policy document.

Ignores the impact of large-scale crowd events that take over parkland for weeks at a

time: The 2013 ROSE views mass crowd events as beneficial from a financial standpoint for McLaren Park (Policy 1.5). However, in the section on Golden Gate Park, (Policy 1.6), the ROSE does not mention the negative impacts of the very large festivals on Golden Gate Park's landscape or the fact that the majority of San Franciscans lose the use of the parkland before, during, and after those events. Impacts to wildlife habitat and the damage to the fragile natural environment should be also given more consideration. The ROSE should recommend finding other, less environmentally vulnerable venues for these massive events.

Gives artwork undue priority for prominent placement in parks: The 2013 ROSE includes the odd concept that artwork is primary to parkland. (Policy 1.7) Artwork reminds us that we are in the midst of a built environment. Artwork can enhance a park, but it should not be the main focus of parkland that is supposed to be naturalistic. Trees and other natural features are nature's ultimate art and should be given priority in our parks. Why is artwork being addressed in the ROSE? The ROSE should be protecting our parks for the enjoyment of our natural surroundings.

Favors certain existing city planning documents over others: Although other planning documents older than the Golden Gate Park Master Plan (Master Plan) are accepted "as is," for some reason, the Master Plan is viewed as needing revisions. (Policy 1.6) However, the 200-page Master Plan is a recent document, finalized in 1998. In addition, it was the result of an extensive 10-year process, with input from many City departments, neighborhood organizations, and individuals. It even has its own Environmental Impact Report. In spite of this extensive vetting of this plan, the 2013 ROSE proposes evaluation of this plan to see which sections are "relevant."

Golden Gate Park was designed and is used by San Franciscans as a respite from urban stress, but the eastern end of the Park is already suffering from intense traffic and institutional creep. Unfortunately, the current Recreation and Park Administration is more focused on revenue generation than on parkland preservation and passive recreation. There is concern by many residents that opening up the Master Plan to major changes would lead to a full-scale dismantling of the Plan and the introduction of more buildings, paving, revenue-generating features, and events in Golden Gate Park. In addition, Section 2 of this ROSE policy proposes paving large areas along the southern edge of Golden Gate Park. This would require re-grading the hilly landscape along the Park's edge and removing many shrubs and trees that currently screen park visitors from the traffic along Lincoln Avenue.

As with most of our parks, the main improvement that Golden Gate Park needs is better maintenance. Piecemeal evaluation of the Master Plan does not do justice to either past planning efforts or to Golden Gate Park itself. The 2013 ROSE should emphasize the need for a better level of maintenance of the Golden Gate Park landscape, protection from high-attendance events, and for preservation of its naturalistic character, as mandated in the Golden Gate Park Master Plan.

"Inequity is not an accident. It is man made and can be eliminated by the actions of human beings. "

Inspiration: Nelson Mandela quote on poverty.

HIGH NEEDS AND SOCIAL INEQUITY

The 2013 ROSE weakens the Park Code definition of "high needs." The 2013 ROSE expands the definition of "high needs" to include future growth and areas with distribution deficiencies. According to the Office of the Budget and Legislative Analyst (Sept. 17, 2013, page. 3), "this allows RPD to give highest priority to properties in areas other than high needs, in contradiction of the priorities specified in the City Park Code." . It opens the door in the ROSE to encourage prioritizing expenditure of tax dollars for open space and parks near the current development of high density market rate residential units. This is an open invitation to de-emphasize affirmative expenditure for such amenities where there is a "conglomeration of high density and high percentages of children, youth, seniors, and households with low incomes," furthering disparity between different neighborhoods, and weakening the fabric of the City.

High Needs Areas: Priority Renovation & Acquisition Areas, (2013 ROSE, Map 06, page 21) is incorrectly labelled: This map mistakenly labels Mission Bay as "high needs", though it is not dense, and it does not have a high percentage of children, youth, seniors or low income households. Mission Bay should not be identified as "high needs". There should be a Map with areas of "Future Growth" that shows future open space, park and recreation deficiencies.

HIGH NEEDS, UNDERSERVED AREAS, SOCIAL INEQUITY AND NEGLECTED AREAS

The 2013 ROSE does not truly prioritize "High Needs" areas for parks, recreation and open space. Despite past public policies for social equity, the politically disenfranchised and lower-income neighborhoods have not kept pace. Like most past expenditures, the Draft ROSE's competing objectives and policies tend to favor new high density development and affluent neighborhoods -- with Area Plans, Park Improvement Plans and public/ private partnerships that are predisposed to higher-income and well-heeled districts. Those with the finances and influence will continue to prosper, leaving behind the Tenderloin, Chinatown, Mission, Excelsior and Bayview with decades of neglected needs for parks, recreation, open space, improvements and maintenance.

The ROSE must make explicit distinctions between the following areas:

5. "High needs" areas that are defined in the Park Code as the "conglomeration of high density, with high percentage of children, youth, seniors and low income households,"

6. under-served and neglected areas that are in need, but are not necessarily dense and only very low income, and
7. those areas of growth which are deficient in open space, recreation and parks. These last areas are the areas of current and recent development which are not low income, not dense with kids, not dense with youth and not dense with seniors. These areas should not be prioritized in the ROSE over long-existing neighborhood needs, or the disparity between various neighborhoods will continue to grow.

The 2013 ROSE should require a strong leveling of the social playing field. More than just acquisition and creation of parks, recreation and open space, the ROSE needs to emphasize equalization of design, maintenance and quality for all neighborhood parks, recreation and open space. To achieve such standards, the ROSE needs to fairly distribute funding and services as a citywide holistic policy. Whether from public, nonprofit or private sources, the whole of funding and services requires equitable distribution based on needs.

THE ROSE & CHILDREN

The 2013 ROSE makes no distinction between children and youth. Map 4C (page 20) shows density of youth, ages 0 – 17. This should be corrected to differentiate the needs of toddlers and young children, preteens and teens. In the 2013 ROSE "children" is left out of the Park Code definition of "high needs." (Page 9.) In addition, references to the needs of "youth ages 0 – 17" should be made consistent with the Department of Children, Youth and Their Families (DCYF) (Policy 2.3, p. 22). There is a world of different needs and interests between a 6 year old and a 16 year old. The ROSE should correct this deficiency.

PUBLIC-PRIVATE PARTNERSHIPS

"The role of a benefactor does not enable one to become a proprietor."

Rev. Harold Snider, the rector of the
Church of St. Francis in North Beach

Public parks are threatened by reliance on public-private partnerships and strong protections are needed to preserve our open space for public use: The general understanding of what the word "public" means in regards to parks and open space came about with the establishment of our National Park System and was reinforced and re-affirmed in the New Deal. The 2013 ROSE urging of the City's dependence upon public-private partnerships as a means of financial support compromises this definition and threatens the independence of our parks and open space.

From "Sustaining Stewardship" in the Introduction to Objective 6, partnerships are emphasized without any clear criteria for who controls the public space, who is responsible to the public, and who is accountable. A private entity's interests may or may not be self-serving, but they are not accountable to the public. Public-private partnerships should not be encouraged simply because they offer local government a means of shifting a public obligation to a private entity. There is nothing in the ROSE's advocacy of public private partnerships that precludes private de facto ownership or control of public lands and facilities.

The 2013 ROSE should insist on maximum protective criteria in public private partnerships to guard the public interest in, investment in, control of and ownership of our public spaces. For example, private entities are not subject to Sunshine regulations and their decision-making process and the outside influences on that process are hidden from the public. The ROSE should provide for full transparency and public vetting of the all internal and external communications as well as all agreements between the City and private partners.

The City should prioritize sufficient public financial resources for our parks and open space.

Since the claim of limited resources is the basis for pursuing public-private partnerships and budgets are factually a set of priorities, the ROSE should encourage the City to prioritize sufficient resources for maintaining and increasing our open space and park and recreation system. Large-scale corporate subsidies of parks and open space are not a desirable alternative to public funding of these public assets because they can come with hidden agendas, lack of transparency, and access or usage restrictions.

Pay to Play? There are many instances in this 2013 ROSE that suggest recreation and open space will go to those who can pay to play. For example, developers are encouraged to provide recreation facilities in private buildings as a way for low-income people to obtain more recreation facilities (Policy 1.11). It is unlikely that affordable access for low-income people would be provided by a profit-oriented developer. As another example of how RPD's revenue-first model further perpetuates inequity and loss of access, RPD often activates public space only to generate funds, as was done with the Peter Pan tent that for six months occupied Sue Bierman Park along the Embarcadero.

Negative consequences of Park Improvement Districts: The ROSE advocates for "*Park Improvement Districts (PIDs)*" (Objective 6, Policy 6.1) PIDs have three potential negative consequences and should not be encouraged in the 2013 ROSE:

- 1) PIDs could add to the disparity among quality of open space and parks in neighborhoods. Areas with well established businesses and well-heeled property and homeowners would be able to raise funding resources that would encourage public investment; however, other areas without such resources would languish. This would add to gaps between neighborhoods.
- 2) PIDs could encourage the status quo in City budget priorities.
- 3) PIDs could undermine the city's responsibility to properly maintain all our parks and open space, regardless of the economic status of each area.

For these reasons, PIDs do not belong in the ROSE.

RECREATION

The 2013 ROSE made some progress in including recreation, but there are still some issues that should be addressed.

Recreation has not been an explicit stakeholder in the development of the 2013 ROSE for the past five years: Recreation was not an explicit directive to the Open Space Task Force in 2007, which drew up a list of the key themes (Planning Department's announcement of Updated Draft, November 2013). In 2009 when the Planning Department held 11 open houses to get input to the ROSE, their questionnaire did not ask specifically for input regarding recreation. And further, when the Planning Commission asked Planning to re-work the 2009 draft, initially there was no stakeholder from recreation on the ROSE Working Group.

There is no specific Related Plans and Agency Program (page 6, Introduction) that advocates for maintaining and increasing recreation. Planning needs to reach out to recreational stakeholders to create a balanced plan.

The ROSE needs to make a clear statement that we need places – facilities and fields -- for active recreation. The US Department of Health cites the need for moderate to vigorous activity. In balancing all of the pulls on the limited resources that we have, we need to ensure that we retain and expand the recreational facilities that enable us to get active recreation. Unfortunately, we have lost recreational fields and facilities such as swimming pools (Sutro Baths), bowling (We did lose the Japantown Bowl; we almost lost the Presidio Bowl.), tennis courts (Ten years ago there were 156 public courts; now there are 132 courts – not all of which are playable. Courts are under siege at Noe Courts, 1481 Post , Street, 8 Washington site, and others.)

The 2013 ROSE relies on the input of the Department of Children, Youth, and Families (DCYF). (Policy 2.3, page 9.) We recommend that the ROSE clearly state policies and protections for recreation which arise from the advice of DCYF, i.e., distinguish the needs for children from the needs of youth – from playgrounds to playing fields – and provide for active recreation for all children from 0-18 years old.

The ROSE needs to use a clear and consistent definition of recreation. Open space can provide for recreation that is either passive and active. Active recreation – facilities, fields, and programs -- provides active physical activity.

In the 2013 ROSE, there is an inconsistent use of the term recreation. When “recreation” describes both “passive” and “active” uses without differentiating between them, then it muddies the policies. For example, page 29, Policy 2.11 says that each residential building should have open spaces that not only meet a minimum size requirement but should also be usable, quality “recreational” opportunities directly outside residents’ front door. In that same section (page 31), the ROSE says that because open space in the downtown urban core is very limited, it suggests green roofs to meet a number of the City’s open space goals including “recreational enjoyment.” Policy 3.1, page 34, suggests that wide streets provide an opportunity to develop "living streets, especially where dense residential developments are being built. . . the streets should be designed with places for relaxation, recreation and neighborhood gatherings.” Greenery outside your door or on roofs or street medians is not “recreation.” It is “open space.”

The ROSE should have a benchmark for determining how many recreational facilities and fields San Francisco should have, for both its existing population and for its growing population. The ROSE Working Group recommended that Planning use the guidelines from the National Recreation and Parks Association (NARPA) which provides benchmarks for the number of various athletic facilities per resident. Using these NARPA standards, tells us that San Francisco needs more courts, fields, and pools. The ROSE should strongly encourage maintenance, renovation, and acquisition of new recreational facilities to secure what we do have, and to build more in high needs areas.

There needs to be a cohesive, fair, comprehensive, and transparent way to gather information about how to use our precious stock of recreational resources. Two policies in the 2013 ROSE state that recreational needs will be determined by usage. Policy 1.2, page 9 states, “The City should perform user studies and collect usage data to assess which of the existing recreation and open spaces are the most highly used so that those spaces may be targeted for renovation and improvement.” Policy 5.1, page 44, says “Use intercept surveys, which provides observational park usage, facility-based input to provide neighborhood feedback on recreation programming.” However, having no one on unusable fields and courts does not indicate that residents don’t want them. There needs to be stronger outreach, communication, and lead time when planning for a specific place involves a recreational asset.

Maintenance of recreational facilities and fields should be increased; added to that, recreational fields needs a renovation schedule. The ROSE mentioned several ways in which maintenance is monitored and standards set. In reality, recreational facilities and fields are not closely monitored, and there is little mention of renovation in these guidelines.

Because we don’t have enough recreational facilities and fields, then the ROSE should make stronger statements about conserving those that we do have – ensuring not only that they are cleaned but also that there is a program for renovation and acquisition.

The 2013 ROSE states, “RPD now evaluates parks on a quarterly basis and in addition, the City Controller’s Office provides an annual report on the state of the City’s parks . . . to address maintenance needs.” (Policy 1.4, page 11) We looked at the September 2013 report and compared it to a survey of tennis courts conducted by the Tennis Coalition, a part of the SF Parks Alliance. (www.sfparksalliance.org/sftenniscoalition) The City’s scores were mostly above 85%. The Coalition studied found 32 D's and 18 F's because of the unplayable condition of the courts.

Provide strong protection for the current stock of private and non-profit recreation facilities. In Policy 1.11, page 16, the ROSE says that “Some private and non-profit facilities act in a quasi-public manner . . . These types of facilities should be supported when they serve San Francisco residents, and, if removed, the loss of recreational space they provide should be considered.” We are not sure what the word "considered" means. It certainly is not strong enough to prevent the demolition of recreational facilities without replacement, nor does it provide a guide for the City.

Also, this same policy states that “In permitting new development, San Francisco should continue to encourage space for physical activity, including private recreational facilities in building projects to supplement those provided by the City.” The effect could be to make newly built active recreation available exclusively to those who can afford to buy

or rent in new developments..

The ROSE Working Group urges that this policy be added to the 2013 ROSE: "It is essential that the City preserve the public recreation and open space that remains, and that no loss of recreation and open space occurs." Keep this in the 2013 ROSE.

BIODIVERSITY

While more balanced than the 2011 Draft ROSE, the 2013 ROSE offers a view of biodiversity and natural areas in Objective 4 that is still skewed and unbalanced.

Biodiversity should include both native AND non-native plants. The 2013 ROSE says that "Parks and open spaces in San Francisco include both native and non-native species, both of which contribute to local biodiversity." (Policy 4.1, page 42.) Planning staff has stated in conversations that sentence defines "local biodiversity" as including both native and non-native plants. However, we remain concerned that the tone of the rest of Objective 4 (especially the emphasis on "natural areas" in Policy 4.2), skews this definition to include a preference for native versus non-native plants. We need a stronger statement that local biodiversity gives both native and non-native plants near equal weight. Without this clarification, this 2013 ROSE could be used to justify destroying existing non-native habitat for no reason other than that it is non-native, as long as a few non-natives are left alone. That is not a balanced approach.

In addition, a fair Open Space policy would balance the benefits of restoring "native" habitat in any particular park with the negative ecological impacts of destroying the existing non-native habitats on ecosystem services (e.g., carbon sequestration, wind reduction, control of erosion, and storm water reduction), and on the animals, insects, and reptiles currently living there. This balance must be part of the 2013 ROSE -- and, indeed, it is mentioned as desirable at the beginning of Policy 4.1 -- yet the rest of Objective 4 shows little evidence of this balance in wording or in the actions and policies it proposes.

We remain concerned that Policy 4.2 in this 2013 ROSE constitutes a major "land grab" for the Recreation and Park Department's highly controversial Natural Areas Program (NAP). There is no concept of balance between native and non-native in NAP; it is a native-preferred program. This 2013 ROSE defines "natural area" as "remnants of the historical landscape " (Policy 4.2, page 42). It then directs every city agency to look for "natural areas" throughout the City and to develop management plans for any that are found. While NAP is not explicitly stated as the agency that should manage these areas (an improvement from the 2011 Draft ROSE), it is clear that this 2013 ROSE wants NAP management policies to be replicated throughout the City in these areas. NAP management policies include removal of non-native species simply because they are non-native (e.g., cutting down 1,600 eucalyptus trees on Mt. Davidson), heavy use of herbicides, and closure of trails. These NAP management policies are becoming increasingly unpopular as more and more people learn about them. Our concern is that NAP does not just protect remnants of our historical landscape. It takes large areas with thriving non-native habitats and destroys them in order to "restore" them with native plants whether those plants were there historically or not. By equating "natural areas" with "NAP areas," Policy 4.2 seems to be endorsing this unbalanced approach. Again,

this puts the ROSE in the position of saying there will be no real balance between native and non-native, nor between restored native and existing non-native habitats over large areas of City open space that are currently not part of NAP. "Natural" does not necessarily mean "native," yet the 2013 ROSE assumes the two are the same.

People want “natural” areas, meaning areas with plants and trees and no buildings, to be accessible, safe, well-maintained, and green and filled with growing things. People want a variety of plants that look nice, and space that gives them a chance to escape from urban pressures and run, walk, and play with friends, family, and pets. In essence, they want miniature versions of Golden Gate Park in their neighborhood parks. Nowhere in this list does it say “native” only. While some native-only areas are good, people do not want the majority of their open space to be native only. Policy 4.2 seems to imply that any newly defined “natural” area should be native only. That is not balanced.

The definition of "sustainability" given in the ROSE is too restricted. In Policy 4.3, the 2013 ROSE says that park and open space renovations or acquisitions should be done in an environmentally sustainable way, and then lists ways in which that can be done, including planting native and drought-tolerant plants and creating habitat for local and migrating wildlife. However, an environmentally sustainable landscape is one, for example, that is capable of existing with little use of herbicides (and certainly not repeated applications) and little use of irrigation. A sustainable landscape is one that can exist with typical public access and use. A sustainable landscape will not only enhance biodiversity (both native and non-native), but will also provide an attractive, colorful palette throughout the year. These additional definitions and concepts for what constitutes an environmentally sustainable landscape should be included in the ROSE.

The 2013 ROSE also contains no protections for public access to and recreational use of open space in the natural areas, whether a NAP-managed area or other "natural" parkland. Fences have been erected to keep people out and signs installed that say "Off Limits" in NAP-managed areas in city parks. Parkland that is locked away from public use ceases to fulfill the open space requirements and needs of the City's residents. The ROSE should be designed to not only expand the amount of open space in San Francisco but also to protect and expand public access to it as well, not just in how you get to the park, but what you can do in the park once you get there.

Finally, this 2013 ROSE states, "Yet, San Francisco continues to lose species diversity due to isolation and fragmentation of habitats." (Policy 4.1, page 42) We question this statement. Scientific articles have stated that over the past 150 years, San Francisco has lost only 19 of its native species, while 695 native species remain ("Plant traits and extinction in urban areas: a meta-analysis of 11 cities," by Richard Duncan, Steven Clemente, Richard Corlette, et al., *Global Ecology and Biogeography, A Journal of Macroecology*, published online January 17, 2011, Vol. 20, Issue 4). This is hardly the large-scale loss of species implied by this statement in the ROSE. It should be removed.

OTHER OBSERVATIONS

Page numbers correspond to the 2013 ROSE

Page	Title	Comment
p. 9	Objective 1, Policy 1.1	Last paragraph: "traffic medians can be transformed into community gardens," is a hazardous proposal. Planted medians can be a community amenity, but community gardens in medians mix people and traffic. Does the City want the liability for many people of different ages and physical ability gardening in and crossing trafficked streets!
p. 9	Objective 1, Policy 1.2	First paragraph, last lines: left out "children" in defining "high needs" as officially defined in the Park Code.
p. 10	Objective 1, Policy 1.3 (2)	Change last paragraph, first lines: "A loss of open space resulting from approval of the proposed facility shall be offset with simultaneous replacement open space of equal or higher quality." Otherwise, delay means possibly never. The 2013 ROSE should mandate pre-arranged open space swaps.
p. 12	Obj. 1, Policy 1.5	McLaren Park, 2 nd paragraph, "Plant species should be hardy, wind- and fire- resistant..." ? Is this exclusive or inclusive of non-native plants and trees? Add language "including both native and non-native plants."
p. 16	Obj. 1, Policy 1.11	Second paragraph, last line: "if removed, the loss of recreation space they provide should be considered." What does the word "considered" mean in this case? Need more specific guidelines.
P. 16	Objective 2	Paragraph 2, last line: "The future population increase in these areas will exacerbate current open space deficiencies." The ROSE should explicitly state that the current resident populations should be prioritized to receive added open space because it is needed now, and not only in the future when the new higher income folks arrive.
p. 17,	Obj. 2, Policy 2.1	Second paragraph, last line, add " provided acquisition in high needs areas is not dependent upon first securing maintenance funds. "
p. 27	Obj. 2, Policy 2.8	Second & third paragraphs. First sentence of third paragraph: "When surplus land is already zoned for public use, open space should take priority over other public uses, delete "including" and add: other than affordable housing. "
p. 31	Obj. 2 Policy 2.12	Second paragraph, third line from bottom, " provide an in-lieu fee option... " We support strengthening and expanding open space requirements citywide. However, this paragraph mixes up providing for POPOS on-site and allowing a developer to pay a fee so that the developer does not have to provide open space on-site. Open space on-site should be prioritized. The two – POPOS & in lieu fee - should be kept separate
p. 42	Objective 4 Policy 4.1	Second paragraph, last line: add " and non-native species " after "which protects native species _____ and..."
p. 42	Objective 4 Policy 4.1	Last paragraph: Volunteers are not owners; the word "ownership" should be deleted from this sentence.

- p. 43 Obj. 4 Policy 4.2 Paragraph 6 top of page 43 : "However, if such an area ("**natural**" areas) is at risk of loss through development, the site should be examined as a candidate for open space acquisition." Is this intended as a priority use of acquisition funds for natural areas? Unless the threatened space is in a "high needs" areas per Park Code, this should not be a priority.
- p. 46 Obj., 5, Policy 5.4 Second paragraph, top of p. 46. "...City should pursue legislation to address the issue of public liability in situations of joint use or joint development of public properties, so that the liability may be equitably shared by multiple agencies..." **Why** should the SFUSD agree to share liability if RPD arranges for the use of the school property after the school is closed? **Why** should this proposal for legislation be in the ROSE?
- p. 46 Obj. 5 Policy 5.5, last paragraph last line. "The City should also explore ways to share ongoing maintenance of parks and open spaces **with individual stewardship organizations or** through inter-departmental coordination." Is this outsourcing of the maintenance work to cut out experienced workers and skilled people who do our maintenance work , or is this about clearing trails like Sierra Club members do? Language too vague to be a guide.
- p. 46 Objective 6 Policy 6.1 "**General Obligation bonds:**" "RPD has been using general obligation bonds as a long-term capital planning strategy." The Harvey Rose Budget Analyst audit criticized, specifically, that RPD has not been developing long term strategies that are transparent to the public. It seems likely that the 2010 mass layoff of recreation staff and the shift to "revenue first," with the closing of many clubhouses and the privatizing of others, was actually a strategic plan; however, it was not publicly vetted before it was implemented. The 2013 ROSE should direct RPD to share long-term strategies with the public before racing to implement them without a thorough public process.

CONCLUSION

We appreciate once again the opportunity to comment on and further improve the 2013 ROSE. We look forward to working further with the Planning Department and the Commission on this very important document.

ROSE Working Group members,

Denis Mosgofian, PROSAC, District 5,
TakeBackOurParks.org
Kris Schaeffer, Friends of San Francisco
Recreation
Sally Stephens, Ph.D, Golden Gate
Heights, Neighborhood Assoc., SF Dog
Katherine Howard, American Society of
Landscape Architects

Linda D'Avirro, Chair, PROSAC
Judy Berkowitz, President, CSFN
Rose Hilson, Executive Committee,
CSFN
Howard Wong, San Francisco
Tomorrow

cc: Planners Sue Exline, Kimia Haddadan
Jonas P. Ionin, Commission Secretary
Planning Commissioners

Campaign Letter – various dates (28 signatures)

Thank you for taking time to review and provide comments on the 2013 Draft ROSE. We have reviewed your comments in their entirety. Below you can find how your comments have contributed to improve the ROSE as well as the Department's responses to your comments and questions.

All comments the Department has received have been broken down by themes as described in the Memo to the Planning Commission, dated March 13, 2014. In **bold** below are these themes, followed by the highlights of your comments under that theme *in italics*. Finally the Department response is listed for each theme of your comments.

Preservation of open space

Comment highlights

- *Preservation: parkland needs to be preserved and new buildings should not be allowed, as is currently the case in the 1986 ROSE.*

Department Response

We have made some modification to the language in Policy 1.3 to clarify the meaning of recreational and cultural buildings.

We have received a variety of comments on this policy that would call for a balance between conflicting needs. We have received many comments asking for additional focus on recreation and improving and adding to our existing pool of recreational facilities.

Building new recreational facilities solely through acquisition of additional land is infeasible due to high costs and the scarcity of available land in the City. Therefore, this policy calls for a balanced approach to provide more recreational and cultural facilities through an efficient use of underutilized space within our existing open spaces. This policy provides specific guidelines if new or expanded facilities are proposed and calls for replacement of open space if lost within this process.

Golden Gate Park Master Plan

Comment highlights

- *Proposal to open up the recent 1998 Golden Gate Park Master Plan could lead to undermining the Master Plan.*

Department Response

The Golden Gate Park Master Plan is the result of an extensive city and community collaboration. The result is a very beloved Master Plan for one of the city's most beloved open spaces. The ROSE in no way suggests that any process to review the Golden Gate Park Master Plan should be done unilaterally by the city. However, the

ROSE is a 20 year document and the current Golden Gate Master Plan is now a 16 year old document. Life of policy documents usually span from 20 to 25 years. This ROSE policy calls for improvements to GGP and, per your suggestion, the language has been modified to make it clear that any potential changes to the Master Plan should happen with community collaboration.

January 22, 2014

Ms. Kimia Haddadan
Planning Department
1850 Mission Street, 4th floor, SF CA 94103

Re: 2013 Draft ROSE - preservation of open space in our parks

Ms. Haddadan:

San Francisco must budget for more open space and, if a new buildings are needed, the City should allocate funds for both acquisition of the land and the construction of that building. San Franciscans should not have to sacrifice their parks and playgrounds to new buildings. I would like the final 2014 ROSE to reflect that option, as did the 1986 ROSE.

I am concerned that the Draft 2013 ROSE encourages building in our parks. Our parkland is limited and precious. Without a firm "no" to new buildings, we leave our parks open to powerful and well-funded special interest groups. Once one building went up, more would certainly follow. San Francisco as a City will become only more dense. To protect our parks as open space for future generations, the 2013 Draft ROSE should have strong restrictions against new buildings in our parks.

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Thank you for your consideration.


Name/ Address/ contact information

cc: Planning Commission
Historic Preservation Commission

John Marc Chaudron
807 Shotwell St #3
SF, CA 94110

jmc@dolorespark.org

January 22, 2014

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Planning Department
1650 Mission Street, 4th floor, SF CA 94103

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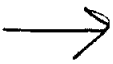
Thank you for your consideration.

Eric Brant
Compsys Coordinator
OUR CITY San Francisco

Name/ Address/ contact information

cc: Planning Commission
Historic Preservation Commission

January 22, 2014



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Thank you for your consideration.

*Alan T. Clark, 2000 Montgomery Blvd, SF 94127
415. 566. 9729*

Name/ Address/ contact information

cc: Planning Commission
Historic Preservation Commission

January 22, 2014

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1650 Mission Street, 4th floor, SF CA 94103

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Thank you for your consideration.

DEANSE D'ANNE
351 GONZALES ST
SF 94107


Name/ Address/ contact information

cc: Planning Commission
Historic Preservation Commission

January 22, 2014

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Planning Department
1650 Mission Street, 4th floor, SF CA 94103

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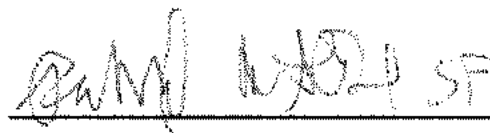
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Thank you for your consideration.


Pam Wright SF Green Party County Council / Zeitgeist Movement

Name/ Address/ contact information

co: Planning Commission
Historic Preservation Commission

January 22, 2014

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Planning Department
1650 Mission Street, 4th floor, SF CA 94103

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Thank you for your consideration.

Barry Hennessey
2467 28th Ave.
S.F., CA 94116

Name/ Address/ contact information

cc: Planning Commission
Historic Preservation Commission

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Planning Department
1650 Mission Street, 4th floor, SF CA 94103

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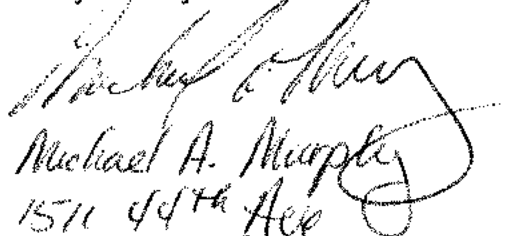
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Thank you for your consideration.


Michael A. Murphy
1511 44th Ave
SF CA 94122

Name/ Address/ contact information

cc: Planning Commission
Historic Preservation Commission

January 22, 2014

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Planning Department
1650 Mission Street, 4th floor, SF CA 94103

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Thank you for your consideration.

SF Green Party

(John Marc Chabong, county council

signing on behalf

cc @ sfgreens.org)


Name/ Address/ contact information

cc: Planning Commission
Historic Preservation Commission

January 21, 2014

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Thank you for your consideration.

Claire Zenski
155 Edinborough
San Francisco, Ca 94112

Name/ Address/ contact information

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Name/ Address/ contact information

cc: Planning Commission

250 CONNECTICUT ST, SF 94107
CMILLET@YAHOO.COM

January 21, 2014

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Thank you for your consideration.

Nancy Stafford
NANCY STAFFORD
1377 16th AVENUE
S.F. CA 94122 HS 681-2649

Name/ Address/ contact information

cc: Planning Commission
Historic Preservation Commission

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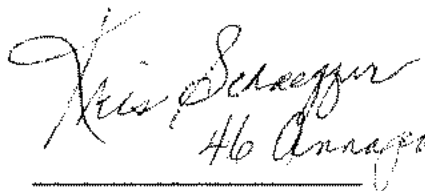
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Thank you for your consideration.


Kris Scheffer
46 Annapolis Terrace, San Francisco CA 94118
415 386 7042

Name/ Address/ contact information

cc: Planning Commission
Historic Preservation Commission

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Thank you for your consideration.

Mina Celis
999 Alabamoa St
SF CA 94110

Name/ Address/ contact information

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Historic Preservation Commission

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1650 Mission Street, 4th floor, SF CA 94103

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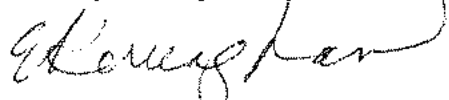
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Thank you for your consideration.


ELLEN KERNAGHAN
718 WISCONSIN ST.
S.F., CA. 94107

Name/ Address/ contact information

cc: Planning Commission
Historic Preservation Commission

January 21, 2014

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Planning Department
1650 Mission Street, 4th floor, SF CA 94103

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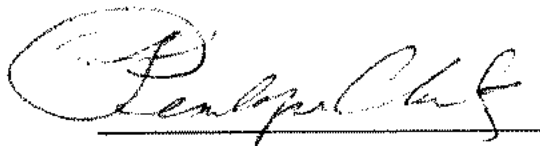
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Name/ Address/ contact information 2544 Leavenworth St. SF 94133
penelope.clark@yahoo.com

cc: Planning Commission

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Parkmenaced Action Coalition
P.O. Box 320162
San Francisco - Ca 94132

Name/ Address/ contact information

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*Dr. Terrence John Faulkner, J.D.
County Central Committeeman*

Name/ Address/ contact information

cc: Planning Commission

*110 Crespi St.
SF. 94132*

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Karim Crommie
628 Araby St
SF 94117 *kcrommie@aol.com*

Name/ Address/ contact information

cc: Planning Commission
Historic Preservation Commission

February 8, 2014

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San Francisco, CA 94103

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Name/ Address/ contact information

cc: Planning Commission
Historic Preservation Commission

1965 Page St # 301
SF CA 94117

February 8, 2014

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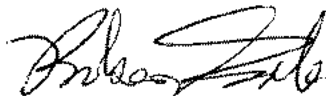
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Robert Easle
536 Clayton St.
San Francisco, CA 94117

Name/ Address/ contact information

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Historic Preservation Commission

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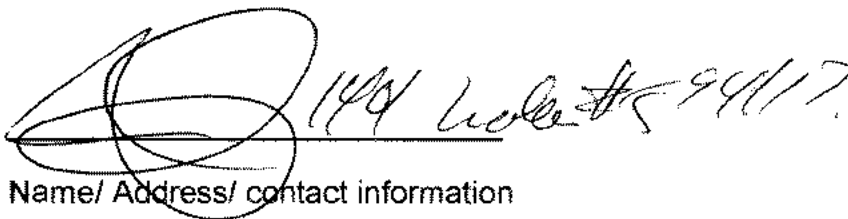
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144 L... 99/17

Name/ Address/ contact information

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Historic Preservation Commission

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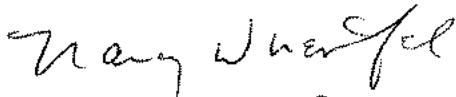
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NANCY WUERFEL
2516 23rd Ave. SF 94116

Name/ Address/ contact information

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Historic Preservation Commission

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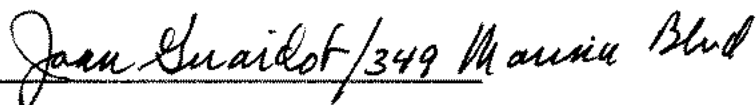
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Juan Barish
711-27-4th Ave
SF 94121

Name/ Address/ contact information

cc: Planning Commission
Historic Preservation Commission

January 22, 2014

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1650 Mission Street, 4th floor, SF CA 94103

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Shawna Mathew
1522-32
S. F. CA 94122

Name/ Address/ contact information

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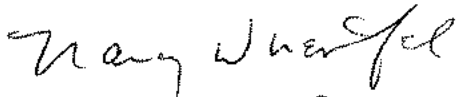
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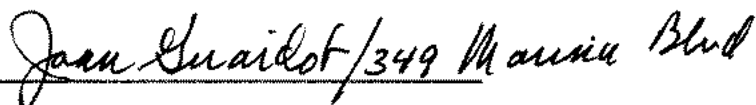
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