

ATTACHMENT E: Meeting Summary and Agency Responses
 Public Hearing – Pest Management Activities on City Properties
 12/16/15, 1455 Market St., San Francisco, CA

	Comment	Agency Response
1	How can the public know where pesticides are applied?	<p>The current draft of “Restrictions on Most Hazardous Herbicides” addresses this issue by including language requiring that “All treated areas must be clearly noticed, marked and identifiable for four days after the treatment.” We have also revised required signage to include maps when appropriate.</p>
2	All hazard tier I and II pesticides should be banned	<p>The purpose of San Francisco’s tier system is to flag potential hazards of pesticide products. However, hazard alone is not sufficient for guiding product selection; the product’s potential for exposure and efficacy are the other critical pieces of information. There are some lower hazard (Tier II or III) products, for example, that might require large volume applications to be effective, and therefore might pose a higher risk than a Tier I product that is used in tiny quantities, or in situations where humans and pets are not likely to be exposed (such as baits). For this reason, San Francisco’s Integrated Pest Management (IPM) program has developed a process to systematically review both hazards and exposure potential.</p> <p>The Precautionary Principle Ordinance (Environment Code, Chapt. 1) requires that City agencies “examine a full range of alternatives and select the alternative with the least potential impact on human health and the environment including the alternative of doing nothing.” This means that in addition to reviewing likely impacts of pesticide products, we must also consider the relative effectiveness and risk of alternative control methods, and the likely risks of no treatment at all before adding a pesticide product to the Reduced Risk Pesticide List.</p> <p>Based on past experience with SF’s pesticide ban in 1996, which led to significant deferred maintenance and public complaint, we do not believe that an outright ban will serve the public interest. However, we agree that each department must set specific goals that will reduce public exposure to pesticides, while accounting for current and needed staffing levels.</p>

3	City should be using more herbicides to protect endangered native habitats, which are shrinking. This includes using more triclopyr (Garlon®)	The IPM Ordinance requires that the City save pesticides as a method of last resort. Meanwhile, the protection of native habitats is also a priority for the City, as shown by the General Plan's Recreation and Open Space Element (ROSE) (Objective 4). The IPM program seeks to strike a balance between these goals.
4	Rodenticide use trends should also be presented	Noted – We will do so at the Jan. 26 Commission on the Environment meeting.
5	Oxalis and blackberry plants are not problems for biodiversity	The Recreation & Parks Natural Areas Program has observed many instances of these species smothering native plant communities. Yellow oxalis and Himalayan blackberry are both listed on the Cal-IPC inventory. Both species are widely recognized and observed by California coastal land managers to outcompete and suppress germination of native and other plants in dunes, grasslands, native understories and in garden settings.
6	Use of imazapyr at Heron's Head Park for cordgrass has caused the endangered Clapper Rail to disappear	<p>The cordgrass treated at Heron's Head Park is one of four species also known as invasive <i>Spartina</i>. In the long term, this plant poses a clear threat to native ecosystems and to the endangered Clapper (now Ridgway's) Rail, particularly by its colonization of mudflats and competition with native <i>Spartina foliosa</i>. Initially at least one of the pair of Ridgway's rails had moved to Heron's Head Park from another SF Bay Area site in 2010 (one had been radio tagged at Colma Creek). The last sighting was in 2014.</p> <p>In addition to their need for mudflats, Ridgway's Rails need vegetative cover for feeding, and it is possible that removal of the Heron's Head invasive <i>Spartina</i> affected the population there. A 2015 report on the subject suggests that the large perimeter-to-area ratio of the site does not favor rail populations, and there are many other human factors at Heron's Head that could also affect the rails.</p> <p>The Invasive <i>Spartina</i> Project work is being carefully monitored and documented all around the SF Bay. The studies can be found here http://www.spartina.org/. Imazapyr is the product selected by this project, has extremely low bird toxicity, and is considerably less disruptive than tarping or manual removal of <i>Spartina</i>.</p>
7	The City has been spraying blackberries that are eaten by children and birds on	Himalayan blackberry (not native blackberry) is rated as highly invasive by the California Invasive Plant Council, and can quickly take over sunny moist areas and grasslands. Blackberries are generally controlled by

	Mt. Davidson	mechanical removal, sometimes in combination with root daubing or foliage sprays. According to the Recreation and Parks Department, pesticide treatments are only used after the berry season has ended.
8	Who decides what species or ecosystem is of value?	Determination of which species or ecosystem has value is a function of a century of conservation science, law and practice – land preservation, conservation biology, restoration ecology – whereby scientists, practitioners and the public-at-large have expressed through laws and policies a priority for conserving what remains of our natural environment. The federal Endangered Species Act requires the designation of critical habitat for federally listed species and prohibits “takings” of these species. The California Department of Fish and Wildlife is responsible for the conservation of California’s native plants through the implementation of a host of programs including the California Natural Diversity Database (CNDDDB), the Native Plant Program, and the Vegetation Classification and Mapping Program. San Francisco’s General Plan, through its Recreation and Open Space Element (ROSE) (Policy 4.1) requires the City to “Preserve, protect and restore local biodiversity.” Specifically, the policy states that “the City should employ appropriate management practices to maintain a healthy and resilient ecosystem which preserves and protects plant and wildlife habitat, especially rare species which are the primary contributors to local biodiversity.”
9	“Designated path” is an unclear definition, since unofficial paths abound.	We have further clarified this definition in the revised draft.
10	“Children’s playground” is an unclear definition, since children may sometimes use almost any place in a park.	We have further clarified this definition in the revised draft.
11	Why does poison oak get special treatment? It’s a native species and can be removed manually.	Most people are susceptible to allergic dermatitis caused by poison oak. City removal of poison oak only takes place in areas where large numbers of park users (especially children) could come into contact with the plant, for example, along frequently used paths or adjacent to children’s playgrounds. There is also a significant worker health hazard involved with manually removing poison oak. The draft policy specifies that herbicides can be used

		to mitigate a public health or safety hazard.
12	The Exemption Process seems too open, that everything could get an exemption.	In 2015, 6 out of 21 exemption applications were denied, and 3 of the exemptions granted were for “trial use” of lower-risk products. The actual number of exemptions denied would be significantly higher except that staff are encouraged to discuss potential exemptions first with the Department of the Environment IPM Manager. To obtain an exemption, City pest managers must provide a written application to the Department of the Environment that includes (among other things) a justification, a description of other control measures that have been attempted, and a plan for avoiding future exemptions. If an exemption is approved, all of this information is automatically posted on the Department of the Environment website .