



Friends of Rose Creek *

"Connecting Our Communities"

4629 Cass Street #188
San Diego CA 92109



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Via Email Transmission

Melissa Garcia
Senior Planner
City of San Diego Planning Department
1222 1st Ave MS 413
San Diego, CA 92101

Dear Ms Garcia,

Thank you for allowing us to comment on the *Draft Urban Forest Management Plan*.

The tree list indicates species as native to the states of Baja and Alta California located in Mexico and the US respectively. We appreciate the effort it took to include natives of the states of California and the Southwest. However, the tree list does not indicate which trees are native to the City of San Diego. Most of the trees listed as natives are native somewhere but not necessarily in the City limits. We feel this is disingenuous. Furthermore, while listing trees as California native may be technically accurate, many California native trees are not appropriate in the City of San Diego. For clarity, please list all trees as native in the City of San Diego, other parts of Southern California, California, Baja California, etc. A property owner who wishes to include trees from the list should be able to identify easily the tree species native to the City of San Diego.

Most communities in San Diego have natural open space areas in them. We have a strong concern that some of the selected trees are inappropriate near or adjacent to open space. By open space, we do not mean City designated open space parks, but all open space habitat no matter if it is privately owned, dedicated parkland, or land owned by the City for other purposes. For example, much of Rose Creek is owned and managed by the Stormwater and Transportation department. While it is not dedicate open space, it is critical coastal fresh water and salt marsh habitat.

Any tree species that is somewhat invasive or would hybridize with native tree species should be removed from the list. We believe this is the safer and simpler option. We spoke with members of the Community Forest Advisory Board regarding this matter. While creating an urban forest is a laudable goal, doing so at the expense of our diminishing native habitat would be shortsighted and morally reprehensive. We are blessed to live in a place with an abundance of diversity in plants, trees and animal species and we care for these forms of life as trustees for future generation.

**A member of the Rose Creek Watershed Alliance*

** A Friends Group of San Diego Canyonlands, Inc.*

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“Our very identity is partly defined by our place. As we make our choices in plants and conservation, we can contribute, or take away, from the unique beauty and utility of the places we inhabit. With so much of the world becoming more homogenous every minute, don’t we owe it to ourselves and to the world to make sure that our places are not erased? Let’s be proud of our native places and let’s work to keep the natives in them” (from <http://nativeplantwildlifegarden.com/native-plants-and-a-sense-of-place/>)

While the plan does address the impact of planting invasive and non-natives on our Open Space Parks, not all native habitat areas are designated as an open space park. For example, lower Rose Creek from the southern end of Marian Bear Natural Park to Mission Bay Park is open space; however, it is not dedicated open space parkland and therefore is not managed by the Department of Parks and Recreation. This natural area is owned and managed by a variety of government agencies provides critical freshwater riparian and salt marsh habitat. Nothing in the plan as written will prevent invasive tree species from being planted along lower Rose Creek. This issue applies to many other City owned lands as well. In fact, a low guestimate is that sixty percent of the streets in San Diego drain into an area with native habitat. Storm water runoff can drain properties half a mile or more away into our native habitat areas. Therefore, the potential of further contamination of natural areas is immense.

Finally, we do not want the City of San Diego to incur additional expenses or removing non-native trees from our native habitat areas.

Page 20 of the plan, under Tree Planting Adjacent to Open Space, should be revised to include the following statement: “The exclusion of planting invasive trees near any natural canyons, creeks, hillsides or other areas currently containing vegetation native to the City of San Diego including but not limited to designated ‘Open Space’ areas.”

Comments on some of the specific goals are as follows:

Goal CE-J.1. Develop, nurture, and protect a sustainable urban/community forest. Subsection D. Provide forest linkages to connect and enhance public parks, plazas, and recreation and open space areas.

This section should be revised to include the following statement: “All linkages to open space areas should only include trees appropriate to the specific open space area in question to create a visual tie between the open space and the community. As appropriate tree is one that does not have the potential to hybridize with trees in the area of native habitat or migrate into the area of native habitat.”

Goal CE-J.2. Include community street tree master plans in community plans. d.

This section should be revised to include the following statement: “Encourage where appropriate, the use of native, noninvasive, and water efficient species and collaborate with nursery owners on species selection.”

Goal CE-J.2. requires communities to select a palette of trees during a community plan update that will be planted on parkways and medians.

This will then preclude planting of other species of trees including site-specific native trees in property owner’s parkway areas. For properties that are being re-landscaped with native plants to create a

sustainable, drought tolerant garden, this could negatively affect landscaping with a sense of place. The Friends of Rose Creek feel very strongly that local natives should be included in the palette of trees and that Eucalyptus, and all non-native species that would hybridize with native trees be excluded from the plan and specifically from the community palettes for Pacific Beach, Bay Ho, Clairemont, University City, La Jolla and surrounding areas to protect the Rose Creek watershed including Marian Bear Natural Park, Rose Canyon Open Space Park, lower Rose Creek, and natural habitat in Mission Bay Park.

As to the specific trees on this list, all trees on the list should be recyclable at the Miramar Green Waste Recycling facility to avoid further overburdening our landfill and increasing disposal costs to the City of San Diego.

We think *Rhus integrifolia* (Lemonade Berry) and *Malosma* (Laurel Sumac) should be added to the list of appropriate shrubby trees for small parkways. They provide habitat, can stand up to a great deal of neglect and destruction as evidenced by the very large stands along the Rose Creek Bike Path between en Magnolia and Hornblend Streets in Pacific Beach as shown in Figure 1 below:



Figure 1- Rhus integrifolia (Lemonade Berry) and Malosma (Laurel Sumac)

Another potentially appropriate tree is *Pinus muricata*- but again we defer to the experts.

We also recommend removing Shamel ash and Paperbark melaleuca based on suggestions from other people. We have a concern that *Rhus lancea* might hybridize with *Rhus integrifolia* and feel the latter is a better choice as it is native to San Diego and thrives here despite much abuse. Finally, we would recommend removing all eucalyptus from this list. While some varieties are not invasive, they all prevent native plants from growing ground cover and are highly flammable – something that we do not need in a City that burns on a regular basis. Furthermore, eucalyptus drops leaves profusely which wash into our storm drains and end up on creek banks where they slow the growth of native species.

The Friends of Rose Creek look forward to participating further in this project as it moves forward and hope that the information can be made available in a more easily understood format in the future.

On behalf of the Friends of Rose Creek,

Karin Zirk
Volunteer
Friends of Rose Creek
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