

February 23, 2017

RECEIVED
BOARD OF SUPERVISORS
SAN FRANCISCO

BOS-111, cpage
BOS-148

San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place
City Hall, Room 244

2017 FEB 28 AM 10:00

ZBB

Phil Ginsburg, General Manager
San Francisco Recreation and Park Department
McLaren Lodge & Annex
501 Stanyan Street
San Francisco, CA 94117
Phil.Ginsburg@sfgov.org

Ms. Daphne Hatch, Chief - Nat'l. Resource
Management Golden Gate National Recreation
Area Bldg 1061, Fort Cronkhite
Sausalito, California 94965
Daphne_Hatch@nps.gov

Ms. Sharon Farrell
Associate Director of Park Projects Golden Gate
National Parks Conservancy Building 201
Ft. Mason San Francisco, CA 94123
SFarrell@ParksConservancy.org

Subject: Sharp Park Conceptual Restoration Alternatives Report & EIR

I urge you to remove the Sharp Park Golf Course redevelopment from the Natural Resource Areas Management Plan's EIR.

I am a resident of Sharp Park in Pacifica. I am a retired coastal ecosystems ecologist. While I have not been involved in studies of the golf course, I have kept up somewhat with the issue of ecological preservation of the coastal lands adjacent to the Sharp Park Golf Course. I have read and support letters by well-qualified scientists and engineers that voice concerns over the proposed project and EIR.

There are numerous substantive scientific and engineering issues that require special attention, and that argue against the proposed modifications to terrain and hydrography along the west margin of the golf course. Focused, in-depth review on this part of the project site is necessary to ensure adequate consideration of the hydrological and ecological details, as well as protections for the endangered San Francisco Garter Snake and California Red-legged frog.

Additionally, this action is a direct violation of a promise. When the scope of the Natural Resource Areas Management Plan's EIR was defined, Recreation and Park Department promised: "Should changes to the Sharp Park Golf Course be proposed, they would undergo a separate regulatory review, including CEQA environmental review."

Please honor this promise, preserve the public trust in City government, and ensure that San Francisco is making the most informed environmental decisions possible.

On February 28, please vote to remove the Sharp Park Golf Course redevelopment from the Natural Resource Areas Management Plan's EIR and ultimately authorize a separate regulatory review, including CEQA environmental review.



James N. Kremer, Ph. D.
5 Eastlake Avenue
Pacifica, CA 94044
JamesNKremer@gmail.com

Name: Jim Grandcolas
Address: 566 TANWICH LANE
FOSTER CITY, CA 94404
Phone: 650 345-1968
E-mail: GRAN89435@SBC.GLOBE.NRT

BOS-11, BOS-LEG

Opase

RECEIVED
BOARD OF SUPERVISORS
SAN FRANCISCO

2017 FEB 28 AM 10:06

BY ZB

February , 2017

San Francisco Board of Supervisors
City Hall, Room 244
1 Dr. Carlton B. Goodlett Pl.
San Francisco, CA. 94104
Board.of.supervisors@sfgov.org

Re: Support Natural Areas Program and Golf at Sharp Park
Urge Supervisors to deny appeal of Natural Areas Final EIR
Case No. 2005.0912E
Hearing: Feb. 28, 2017

Dear Supervisors,

I support the Planning Commission's approval of the Final EIR for the Rec & Park Department's Natural Areas Plan, which includes habitat recovery for frogs and snakes, while maintaining the historic 18-hole Sharp Park Golf Course.

Please deny the appeals from the Commission's decision.

THEIR IS ABSOLUTELY, A SHORTAGE OF AFFORDABLE public courses on the PENINSULA. THIS IS A PUBLIC TREASURE DESIGNED BY A RENOWNED GOLF ARCHITECT. BIO FRIENDLY GREENKEEPING PRACTICES, AS USED AT CRYSTAL SPRINGS G. C. IN THE ENVIRONMENTALLY SENSITIVE FOOTPRINT OF THE C. S. RESERVOIR, PROVES THE VIABILITY AND COMPATIBILITY OF THE COEXISTENCE OF BOTH NATURE AND A REWARDING GOLFING EXPERIENCE.

Sincerely,

Jim Grandcolas
Jim Grandcolas

Leah Olson

From: Leah Olson
Sent: Tuesday, February 28, 2017 11:50 AM
To: 'Sandra.Fewer@sfgov.org'; 'Mark.Farrell@sfgov.org'; 'Aaron.Peskin@sfgov.org'; 'Katy.Tang@sfgov.org'; 'London.Breed@sfgov.org'; 'Breedstaff@sfgov.org'; 'Jane.Kim@sfgov.org'; 'Norman.Yee@sfgov.org'; 'Jeff.Sheehy@sfgov.org'; 'Hillary.Ronen@sfgov.org'; 'Malia.Cohen@sfgov.org'; 'Ahsha.Safai@sfgov.org'
Subject: TODAY'S HEARING: Remove the Sharp Park golf course redevelopment from the EIR
Importance: High

Dear Supervisors,

My name is Leah Olson, and I live in the Lower Haight – my zip code is 94117. I'm writing you to request that you vote today to remove the multi-million dollar Sharp Park Golf Course redevelopment from the Natural Resource Areas Management Plan.

Independent scientists have criticized the Sharp Park golf course plan as harming the two endangered species that are found there and the wetland ecosystem they depend on to survive. It deserves a more careful analysis and review of alternatives that are less expensive and protect the environment. It's not good government to say that the golf course redevelopment will not be included in the EIR, and then turn around and insert it into an otherwise sound plan.

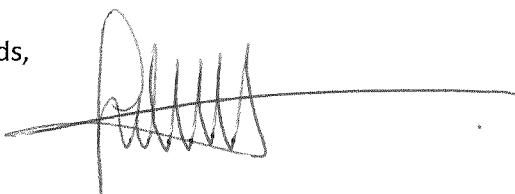
Sharp Park is a money-losing golf course in Pacifica, far away from our local communities. San Francisco taxpayer funds should be used for better purposes – and San Franciscans do NOT want to fund further destruction of a fragile ecosystem. My neighborhood park, Buena Vista, could benefit greatly from reinvestments, and in general our parks and recreation centers located within San Francisco need investments to encourage more residents to use them. Our tax dollars do not belong in Pacifica.

The Board has complete authority to determine that the EIR is inadequate, and therefore at your hearing today **I urge you to vote responsibly and for conservation over profits.** Vote to have the Sharp Park golf course redevelopment removed from the EIR.

What is the environmental legacy you want to be remembered for?

Thank you for putting our natural areas first.

Best regards,
Leah



2/28/17

Leah Olson - Program Manager, Job Search Accelerator
(415) 782-6316



Oppose the redevelopment of Sharp Park Golf Course in Pacifica.
It's built on wetlands, harms endangered species, and wastes
SF taxpayer dollars.

Jan Olson

February 26 at 6:04am

DEAR SUPERVISORS:

As a visitor from Minnesota to this exquisite park land I am astounded that there would be any thought for redevelopment.

Having spent two winters in the Pacifica RV park just up the coast, my husband and I would often walk down to the trail in front of the golf course so we could access the preserved wetlands walk to the south of the golf course and the rest of Sharp Park.

The wetlands preserve is magnificent and gives one the idea what that whole area could look like...Also, this area is on a floodplain! Last winter I recall the streets full of water, the apartments/houses that people had to leave because there was no holding back the king tides, the beach and bluffs eroding away.

And we absolutely can't forget the endangered species that reside here. On our walks along this stretch of Pacifica there were hundreds of people strolling the trail, enjoying the beach, looking for birds and other critters.

Fill in the 18 holes in the golf course, then leave it alone. I wish I could attend this meeting, but unfortunately we did not make it back this year.

I stand with your efforts to preserve this land as a protected natural site.

Sincerely,

Jan Olson
Duluth, Minnesota



Edwin M. Lee, Mayor
Philip A. Ginsburg, General Manager

February 28, 2017

Board of Supervisors
1 Carlton B. Goodlett Pl.
City Hall Room 244
San Francisco, CA 94102

Dear President Breed and Members of the Board of Supervisors,

As you are aware, the Recreation and Park Commission approved the Natural Areas Management Plan on December 15, 2016 after the Planning Commission certified a Final Environmental Impact Report (EIR) for the project. The EIR reviewed the Natural Area Management Plan, as well as the Laguna Salada Restoration Project at Sharp Park in Pacifica. This EIR is now before you on appeal.

As part of the EIR's project-level analysis, the document analyzed three options for disposal of any remaining spoils from the dredging at Laguna Salada after additional upland habitat creation. Those three options were to dispose of the remaining soils on: the remediated rifle range, the on-site organic waste facility, or the golf course. As discussed and analyzed in the EIR, any of these locations could be used and none would result in significant impacts on the environment. This letter is to inform you that the Department will not dispose of any dredge spoils on fairways of the golf course, nor will we use outside soils to raise any of the fairways at Sharp Park. Any dredge spoils that remain after the creation of upland habitat will only be disposed of at the organic waste facility or the remediated rifle range. Although disposal on the fairways was analyzed in the EIR, the Department commits to not pursuing it as a part of this project.

This project has been developed in concert with Federal and State Resource Agencies who oversee threatened and endangered species. This restoration project will increase habitat to benefit the San Francisco Garter Snake and the California Red-Legged Frog, both of which live in and around the Laguna Salada Wetland Complex. Failure or delay in implementing the Project will frustrate recovery efforts and contradict the Recreation and Parks Department's commitment to the resource agencies to implement habitat recovery.

Sincerely,


Phil Ginsburg
General Manager

cc: John Rahaim, Planning Department
cc: Angela Calvillo, Clerk of the Board

SF supervisors need to approve natural-areas program

By Jared Blumenfeld | February 27, 2017 | Updated: February 27, 2017 9:58pm

3

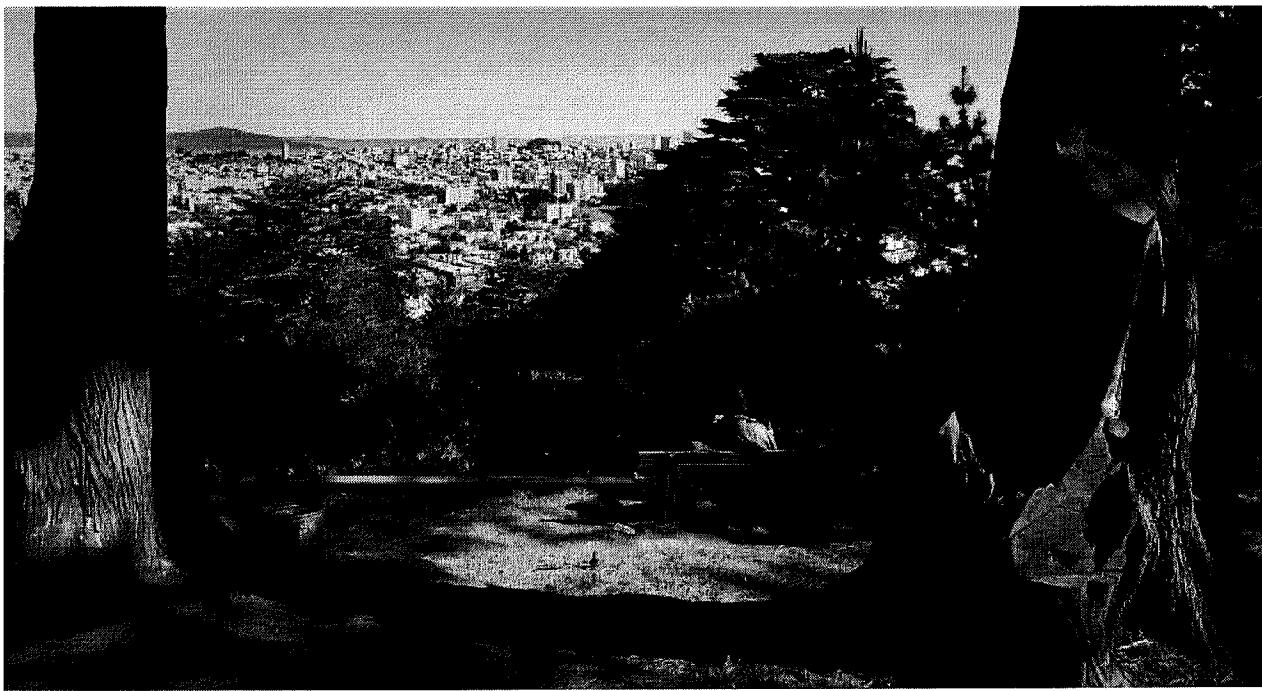


Photo: Russell Yip, The Chronicle

Buena Vista Park, one of the natural areas, offers views of the city including the downtown and northern San Francisco areas.

Every morning, I scramble my way up to Twin Peaks. The panoramic view shows just how green San Francisco becomes

after this much rain. Like glistening emeralds, our parks shine in the early light. For me, urban life is so much more livable because of the natural areas dotted, like islands, throughout our city. I feel grounded, walking under the Coast Live Oaks, knowing that these trees existed before Golden Gate Park was created around them. Today, San Francisco's Board of Supervisors is poised to adopt a blueprint that will allow our city's "natural areas" to be both restored and protected. San Francisco has the opportunity to reclaim the spirit of John Muir by highlighting humanity's true nature.

More than 20 years ago, the public was concerned that if immediate action wasn't taken, San Francisco's natural landscapes might be forever lost. As a result, the city's Recreation and Parks Department established the Natural Areas Program with the goal of restoring and enhancing more than 1,000 acres at 32 sites.

San Francisco defines "natural areas" as what remains of our city's primordial landscape. These lands include diverse native habitats and species, like the Mission blue butterfly and San Francisco garter snake, that are found nowhere else on Earth. Today, these wild places remain fragile; their single biggest threat is invasive weeds.

Many cities wouldn't have the skills to implement such an ambitious plan. San Francisco is lucky. I have worked alongside the highly



READ MORE

Trump may cost America our tourists

trained conservation biologists, horticultural specialists and gardeners who have made San Francisco's natural areas recovery their life's work. Together with hundreds of volunteers, work is done every day to improve San Francisco's wild places.



Patients should know why their doctor is on probation



California has a responsibility to get foster kids to school

For larger-scale natural-areas projects, a plan was required. Unfortunately, there has been a near glacial delay between the completion of a forward-thinking management plan, back in 2006, and that plan being blessed by the Board of Supervisors. Fortunately, today that wait could be over.

If you care about protecting San Francisco's wild side, you can make a difference by speaking up at the supervisors' meeting for the plants and animals that don't have a voice. Dog walkers, tree lovers and environmentalists will all articulate reasons they want the Natural Areas plan to go away. As someone who falls into all three camps, I understand their frustration: It's been an exhaustingly long and acrimonious process.

Why should we care about these remnants from a time before San Francisco paved over most of paradise? For me, it's because my identity as a San Franciscan is shaped by a shared sense of place. The city's last wild places are our collective ecological heritage: They make San Francisco unique and bring us peace.

San Francisco is helping lead the fight to stop the Trump administration from dismantling our nation's environmental protection infrastructure. Locally, we need to stand together to show that San Francisco can reach agreement on the importance of protecting the few remaining parts of our city that are truly original. I would recommend the natural areas plan, and its environmental review, be approved because protecting the last fragments of natural San Francisco, can't wait any longer.

Once approved, San Francisco's implementation of the natural areas plan, will act as a shining example, to the world, of how to bring urban nature back from the brink.

Jared Blumenfeld, the former the regional administrator of the U.S. Environmental Protection Agency, recently returned from hiking the full length of the Pacific Crest Trail from Mexico to Canada.

What's at stake and what you can do

The Natural Areas Program has 32 sites, including:

Balboa Natural Area

Bayview Park

Bernal Hill

Corona Heights

Glen Canyon

Lake Merced

Oak Woodlands

Sharp Park

Tank Hill

Twin Peaks

Attend supervisors' meeting

2 p.m., Tuesday

City Hall, 1 Dr. Carlton B. Goodlett Place, Room 250.

Get Involved

You, too, can volunteer to help restore these areas with the Recreation and Parks Department (go to <http://sfrecpark.org/support-your-parks/volunteer-program/>)

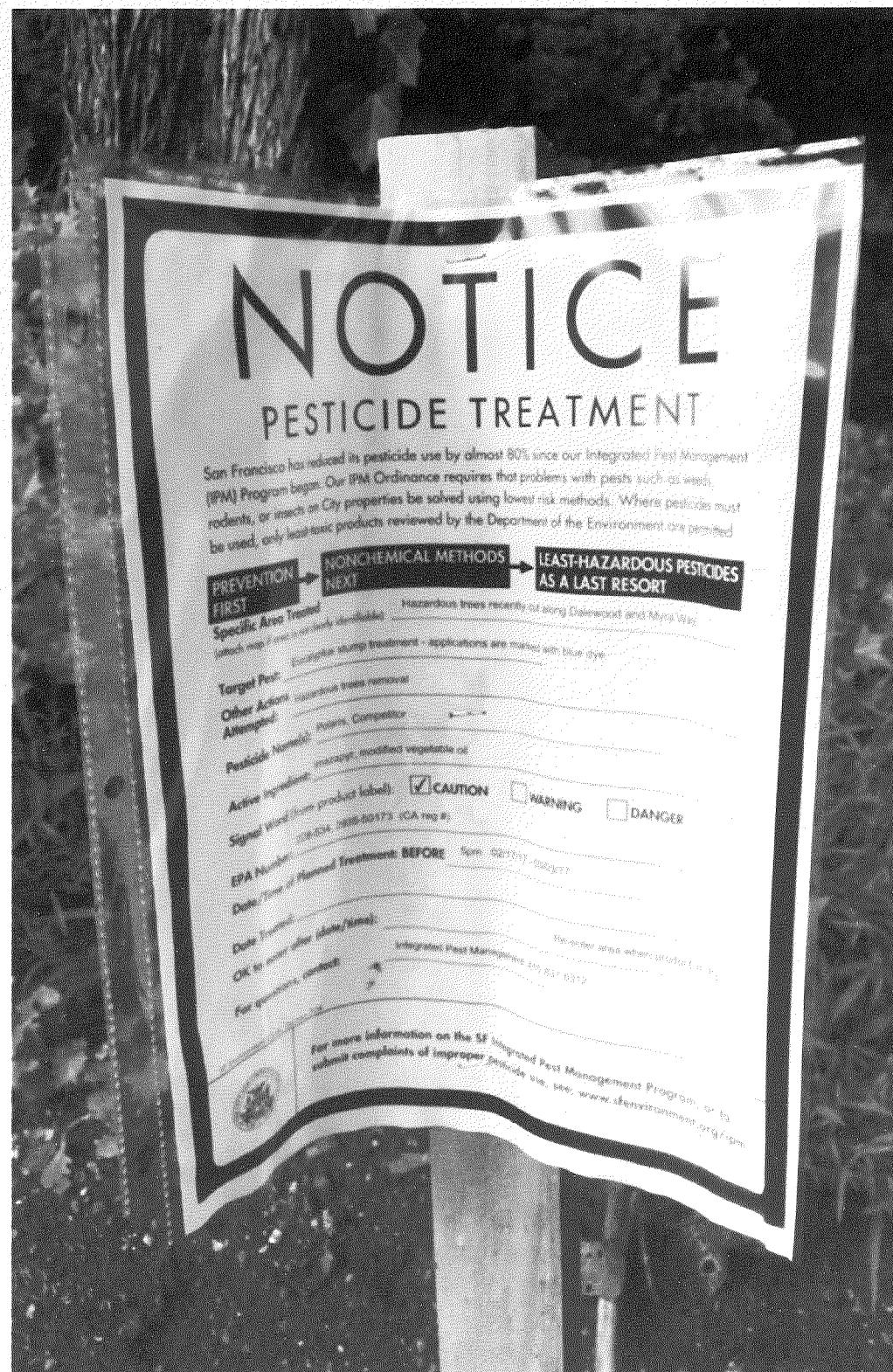
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Poisons - you can't always keep kids
off the grass



GLEN PARK CHILDREN DO not stay on PATHS - they Explore
I SAW them eating SOUR GRASS. Could it be poisoned!?

Poison doesn't Stay
Just where you spray!



Erosion! Where trees cut



GLEN PARK trees cut = erosion



GLEN PARK WHERE trees were cut, there is EROSION
dead stumps = Erosion



GLEN PARK WHERE STUMPS ARE, THERE IS NOTHING TO ABSORB WATER
dead Stumps = EROSION



GLEN PARK TREES CUT = EROSION on Hillside
Where trees were cut.

Dry except where tree was removed, leaving water to seep onto path. not Absorbed - Erosion on hillside



tree removed ↓ Here

WATER
not absorbed

Tree removed
-
affaining
roots
left
exposed



other
trees
Exposed
roots
live.

hole
where
tree
removed



Tree removed was dumped by stream.

EIR NRMP
Appeal

To: San Francisco Board of Supervisors
From: Ossie and Carol Gomez
Date: February 28, 2017

Hello,

We are Ossie and Carol Gomez, District 7 residents living at 221 Juanita Way. We are 50 year residents of San Francisco, and have lived in our current home since 2003. Mt. Davidson is our back yard – literally. Thus we enjoy the birds, trees – even the raccoons and skunks who frequent our yard.

However, this year we were visited by an unwelcome guest. Since late January, we have had a stream (growing to a river at its worst) flowing through the bottom level of our home. This has never happened since we have lived here. Since the February 7th storm, the area has been flooded, with the stream continuing even through today. Unfortunately, this situation prevents us from attending the Hearing today.

It appears that rising groundwater level is the cause. And of course, our Home Owners insurance won't pay for the damages caused. The impact both physically and emotionally has been devastating – leaving us, two seniors on fixed incomes, now wondering what to do.

We are begging you to reject certification of the Environmental Impact Report at the Hearing today. The trees and vegetation on Mt. Davidson are holding the soil and rock together and sucking up tons of water. If a significant number of trees are cut down as proposed, the erosion will be severe, causing more of our neighbors to suffer our fate or worse.

Climate experts tell us our future will be more severe weather patterns – periods of drought followed by devastating storms like this year. Please listen to us and to them. Send the EIR report back for review. When it was written we didn't know all that we do today about climate change. We must learn and act with wisdom – not just steamroll something forward that could injure so many of our residents.

Thank you.

Ossie and Carol Gomez

Carroll, John (BOS)

From: Board of Supervisors, (BOS)
Sent: Tuesday, February 28, 2017 11:08 AM
To: BOS-Supervisors; BOS Legislation, (BOS)
Subject: File 170044 FW: Letter to be forwarded to all supervisors: please reject the SNRAMP EIR appeal
Attachments: Letter to SFRPD Supervisors wrt Natural Areas Mgmt Plan - Golden Hour 20170222.pdf
Categories: 170044

From: lechroy@gmail.com [mailto:lechroy@gmail.com] **On Behalf Of** Lech Naumovich,Golden Hour Restoration Institute
Sent: Tuesday, February 28, 2017 11:03 AM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Cc: Randolph, Alex (REC) <alex.randolph@sfgov.org>; Wayne, Lisa (REC) <lisa.wayne@sfgov.org>
Subject: Letter to be forwarded to all supervisors: please reject the SNRAMP EIR appeal

Dear Supervisors,

We hope you will support moving the forward with SNRAMP and denying the EIR appeal. Please find our letter of support and comments and suggestions on how to move forward while healing the environmental divide attached.

_____ reproduced letter in text of email to follow _____

February 22nd, 2017

San Francisco Supervisors

San Francisco City Hall

1 Dr Carlton B Goodlett Pl #244

San Francisco, CA 94102

RE: Support of adequacy of Environmental Impact Report of the Significant Natural Resource Areas Management Plan (SNRAMP)

Dear San Francisco Supervisor,

I represent an active environmental restoration group which regularly works with the San Francisco Recreation and Parks Department (SFRPD) staff on natural areas management. Our main project, which has been covered extensively by Bay Nature magazine and other publications, is our work preserving habitat for the federally threatened Mission Blue butterfly, which was once common in the City. Through "Mission Blue Crew," we teach volunteers about habitat restoration while providing them with professional volunteer and scientific training. SFRPD Natural Areas program has been especially dedicated to this project. The staff of the Natural Areas Program shows great compassion for resources and the natural world and understand the connection our areas provide to people seeking wilderness in the City.

As supervisors, you serve as the final check-point for determining if the SNRAMP has met its required function: to To help the City and County of San Francisco meet CEQA requirements for analysis of environmental impacts by including a complete and comprehensive programmatic evaluation of the physical impacts of the proposed General Plan and its alternatives.

Various environmental groups have argued that Sharp Park should have never been included in this EIR, as was recommended in section 2.1 of the 2009 EIR Scoping report (Contract No. #4043-06/07). We agree. This political, cultural, and environmental third rail has now created an extremely difficult situation that has eroded general support for the City and many of its wonderful programs. But while it is likely too late in the process to create an environmentally superior alternative that excluded Sharp Park redesign, there is a way forward.

I write to urge you to reject the appeal of the Environmental Impact Report (EIR) of the Significant Natural Resource Areas Management Plan. I further urge you to sign into law a proclamation that the Sharp Park portion of this EIR will not be funded until supplemental analysis is completed and environmental support of this portion of the project is affirmed.

In approving this EIR, we urge you to consider delaying proceeding with specific implementation of the SNRAMP (the Sharp Park redesign) until community support is reached. This could be accomplished through a City proclamation that will affirm the City's commitment to an environmentally sound solution for the future of Sharp Park. We also recommend strategic additional planning session on this issue of Sharp Park. The vast majority of stakeholders who have participated in this process would likely support an approach that can move the SNRAMP forward as a whole while allowing for further collaboration on Sharp Park issues.

The SNRAMP is an important document that outlines how the San Francisco Recreation & Park Department (RPD) can actively protect the City's urban forest, support and protect its biodiversity, and promote environmental justice. The document is valid, and this single issue should not cause the whole process to halt.

Please reject this EIR appeal and uphold the Commissioners' certification of the EIR and the adoption Plan so that remnant landscapes and our ability to promote our forest, biodiversity, and recreational programming within the City limits are not compromised. Sincerely,

Signed,

Lech Naumovich, Executive Director

Golden Hour Restoration Institute

--
Lech Naumovich
Executive Director
Golden Hour Restoration Institute
David Brower Center
2150 Allston Way - Suite 320
Berkeley, CA 94704
510 495 5885
www.goldenhour.org

The mission of the Golden Hour Restoration Institute is to provide engaging, science-based instruction and project leadership in order to conserve and restore native species and habitats.

February 22nd, 2017

San Francisco Supervisors
San Francisco City Hall
1 Dr Carlton B Goodlett Pl #244
San Francisco, CA 94102

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A dynamic, inspiring field-based
restoration ecology institute
powered by community

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Please reject this EIR appeal and uphold the Commissioners' certification of the EIR and the adoption Plan so that remnant landscapes and our ability to promote our forest, biodiversity, and recreational programming within the City limits are not compromised. Sincerely,

Signed,

A handwritten signature in black ink, appearing to read "Lech Naumovich".

Lech Naumovich, Executive Director
Golden Hour Restoration Institute

Carroll, John (BOS)

From: martha oneal <monealbirds@att.net>
Sent: Monday, February 27, 2017 10:15 PM
To: Board of Supervisors, (BOS)
Subject: Support for the NRMP

Please send this message to all supervisors.

Please support the Natural Resources Management Plan. I would appreciate your rejecting the appeals.

Yours truly,
Martha O'Neal

Carroll, John (BOS)

From: Board of Supervisors, (BOS)
Sent: Tuesday, February 28, 2017 10:34 AM
To: BOS-Supervisors; BOS Legislation, (BOS)
Subject: File 170044 FW: Please reject appeals to Natural Area Management Plan
Attachments: Support for the NRMP

Categories: 170044

From: Patrick Marley Rump [mailto:patrick.rump@lejyouth.org]
Sent: Tuesday, February 28, 2017 8:55 AM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Subject: Please reject appeals to Natural Area Management Plan

All supervisors,

I'm writing you as strong 20 year supporter of equity in open space and preservation of SF's natural heritage. At today's hearing we ask that you reject the appeals to recently approved Natural Area Management Plan and EIR. Years of diligent public process, city resources and sound science went into the plan and EIR. It's time to move forward.

Because the plan is program level EIR additional public process will be required on a project by project basis and every one's points of view and concerns will continue to heard, weighed, considered and addressed. However things can not move forward without a plan in place.

The management plan and EIR and the process behind it is solid and needs to be upheld. The future of our city's natural world and peoples rights's to enjoy our amazing and fragile natural areas is in the balance.

Below are some points specific to the need to reject the appeals and move forward.

1. - The Plan - all chapters, including Sharp Park - benefits the species and habitats. The idea to split out Sharp Park is totally ill-advised since we need to take these initial restoration actions for the frog and the snake.
2. - There are no CEQA violations, and therefore the appeals should be rejected.
3. - The EIR should be upheld because it is adequate and exhaustive. Please uphold the EIR for the Natural Areas Plan. The SF Planning Department has done an exemplary job.
4. - Further delay of the NRMP would mean further degradation of species and habitats at all of the City's 32 Natural Areas.

Thank you for consideration of this milestone moment in the future our city's natural resources.

--

Best,
Patrick Marley Rump
Executive Director of LEJ/
Director of Stewardship Programs
CANDLESTICK PT. ECO-STEWARDS

Connecting people to urban open spaces to restore ecology, improve environmental health and strengthen communities.

*****PLEASE NOTE NEW ADMINISTRATIVE OFFICE*****

607 Anderson Street
San Francisco, CA 94110

Cell: 415-574-5103
Fax: 866-909-9466
patrick.rump@lejyouth.org
www.lejyouth.org

LEJ is an environmental education and youth empowerment organization created specifically to address the ecological and health concerns of Bayview Hunters Point and the surrounding communities of southeast San Francisco.

Carroll, John (BOS)

From: martha oneal <monealbirds@att.net>
Sent: Monday, February 27, 2017 10:15 PM
To: Board of Supervisors, (BOS)
Subject: Support for the NRMP

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Please support the Natural Resources Management Plan. I would appreciate your rejecting the appeals.
Yours truly,
Martha O'Neal

Carroll, John (BOS)

From: M.A. Miller <MA-MILLER@msn.com>
Sent: Saturday, February 25, 2017 7:30 PM
To: Board of Supervisors, (BOS)
Cc: Linda Shaffer; Jake Sigg
Subject: Deny the EIR appeal and accept the Natural Areas Plan environmental study

Dear Supervisors,

Please don't turn back ten years of thorough and objective research into the environmental riches and wildlife support that the Natural Areas provide to ourselves and the native flora and fauna of San Francisco. How lucky we are! What a waste it would be to have this process drag on and on for more months and years.

Please accept the EIR for the Natural Areas Program and turn aside the appeal.

Thank you very much!

Mary Anne Miller

Carroll, John (BOS)

From: lponzini@onebox.com
Sent: Monday, February 27, 2017 1:19 PM
To: Board of Supervisors, (BOS)
Subject: EIR on the Natural Resource Areas Management Plan Hearing 2/28

Dear Clerk to the Board of Supervisors,

Please forward this message to all city supervisors. Thank you.

Dear Board of Supervisors,

I am writing to show my support for the final certification of the Final Environmental Impact Report (FEIR) for RPD's Natural Resources Management Plan (NRAMP, aka SNRAMP). I do not believe that the appeals are warranted and urge you to certify the EIR which has already been approved by the SF Planning Commission.

Thank you for your time,

Liz Ponzini

District 4, The Outer Sunset

Carroll, John (BOS)

From: Kirra Swenerton <kirra@rootwisdom.com>
Sent: Monday, February 27, 2017 1:10 PM
To: Board of Supervisors, (BOS)
Subject: Letter In support of the Natural Resources Management Plan
Attachments: PastedGraphic-4.tiff

To whom it may concern,
Please forward the following letter to all city supervisors.

Dear Supervisors,

I am an ecologist with over 20 years of professional experience advocating for nature in the San Francisco Bay Area. I am writing in strong support of the the Natural Resources Management Plan (NRMP) and urge all of you to adopt the plan, as is. All the chapters, including that for Sharp Park, benefit critical habitat for diverse creatures in San Francisco. While I understand the arguments for splitting out Sharp Park, at this point, it is an ill-conceived notion. I have worked as a professional scientist for years on protecting and restoring habitat for both these species and can attest that we need to take the initial restoration steps outlined in the NRMP for both the rare frog and snake to thrive.

Furthermore, there are no CEQA violations in the existing plan and any appeals to this comprehensive document should be rejected immediately. The SF Planning Department has done an extremely thorough and exhaustive job preparing the EIR, which is complete and should be upheld.

Myself, other well-informed environmentalists and the unique and beautiful plants and animals living in the City's 32 Natural Areas have been waiting *far too long* for the NRMP to be approved. Every month, every year, that this plan has been delayed has been harmful to wildlife and biodiversity in San Francisco. I have witnessed this with my own eyes, over the many years I've spent working here, that without the power to take an active role in protecting and restoring habitat, these precious organisms are declining. I urge you to move forward with the NRMP, complete, as is, and take action to protect this incredible city of ours.

Sincerely,
Kirra Swenerton, M.S.

ROOT WISDOM

The Medicine of Reciprocity

Kirra Swenerton, MS
Founder & Director
rootwisdom.com

Carroll, John (BOS)

From: Kirra Swenerton <kirra@rootwisdom.com>
Sent: Monday, February 27, 2017 1:10 PM
To: Board of Supervisors, (BOS)
Subject: Letter In support of the Natural Resources Management Plan
Attachments: PastedGraphic-4.tiff

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Please forward the following letter to all city supervisors.

Dear Supervisors,

I am an ecologist with over 20 years of professional experience advocating for nature in the San Francisco Bay Area. I am writing in strong support of the the Natural Resources Management Plan (NRMP) and urge all of you to adopt the plan, as is. All the chapters, including that for Sharp Park, benefit critical habitat for diverse creatures in San Francisco. While I understand the arguments for splitting out Sharp Park, at this point, it is an ill-conceived notion. I have worked as a professional scientist for years on protecting and restoring habitat for both these species and can attest that we need to take the initial restoration steps outlined in the NRMP for both the rare frog and snake to thrive.

Furthermore, there are no CEQA violations in the existing plan and any appeals to this comprehensive document should be rejected immediately. The SF Planning Department has done an extremely thorough and exhaustive job preparing the EIR, which is complete and should be upheld.

Myself, other well-informed environmentalists and the unique and beautiful plants and animals living in the City's 32 Natural Areas have been waiting *far too long* for the NRMP to be approved. Every month, every year, that this plan has been delayed has been harmful to wildlife and biodiversity in San Francisco. I have witnessed this with my own eyes, over the many years I've spent working here, that without the power to take an active role in protecting and restoring habitat, these precious organisms are declining. I urge you to move forward with the NRMP, complete, as is, and take action to protect this incredible city of ours.

Sincerely,
Kirra Swenerton, M.S.

ROOT WISDOM
The Medicine of Reciprocity

Kirra Swenerton, MS
Founder & Director
rootwisdom.com

Carroll, John (BOS)

From: victor carmichael <vcarmichael@comcast.net>
Sent: Friday, February 24, 2017 6:55 PM
To: Board of Supervisors, (BOS)
Cc: Celeste Langille; Cynthia Kaufman; Barbara S Hubler; camille g; Carlos; deirdre finnegan; Delia McGrath; Dinah Verby; Margaret Goodale; Michael Andrews; Tim Cowan; Kirsten Schwind; Cynthia Knowles
Subject: Letter to SF Supervisors re: Sharp Park Golf Course
Attachments: sharp park golf course.doc

Dear Board of Supervisors:

See attached letter.

Thank you,

V.Carmichael

Victor Carmichael

5005 Palmetto Ave., Pacifica, California 94044
(650) 991 7349

02/24/17

As a resident of Pacifica and member of the Pacifica Climate Committee I take special interest in the Sharp Park Golf Course as it is on the front line relative to climate change induced sea level rise (SLR).

Last month I had the experience of attending a very well contentious and packed San Francisco Supervisors meeting. The issue was approval of the master plan with respect to managing all of the properties that San Francisco Park and Rec is responsible for. Most of the large and complex plan seemed reasonable despite many opposing views presented by the public. That is with the exception of plans re: the Sharp Park Golf Course.

That the City of SF is charged with the upkeep and management of the (money losing) public golf course and many adjacent acres east of it is itself an anomaly since it is located in another county entirely(San Mateo) in the City of Pacifica. The Sharp Park Golf course was built on top of and around the Laguna Salada lagoon and wetland way back in the 1930s well before we knew any better. It's been flooded many times and only resists being returned to its former natural state due to a 1/8 mile long artificial berm. As golf courses go it is not particularly exceptional. It's one claim to fame is that it was designed by Alister MacKenzie, a famed golf course architect.

A good part of the former wetland still survives despite it being enclosed by a golf course. The trouble is that to keep it functional as a golf course, the irreplaceable rare wetland/lagoon and the biological community it supports (endangered red-legged frogs and SF Garter snakes) are constantly put at risk. Now an upgrade is included in the SF Park and Rec master plan. This upgrade poses several problems.

It includes raising some of the fairways which while saving the grass from potential salt water damage, would increase the potential for flooding the adjacent neighborhoods. It would also interfere with the lagoon's natural eastward migration as SLR becomes more severe. Furthermore, the two endangered species' habitat would be damaged due to salt water seepage since that area would end up being closer to the ocean.

And finally it is well known that 'beach armoring' leads to destruction of beaches due to interruption of natural sand travel. This section of beach has a unique natural and complex relationship to the what was formerly a semi-saline lagoon. A berm, which is a form of beach armoring or revetment, has changed that relationship. While it protects the golf course, its placement has an unclear affect on the sand and could eventually lead to its loss or possibly exacerbate neighborhood flooding if suddenly breached in a serious storm and high tide situation. Much would be gained if the berm were removed and the natural relationship restored.

Please reconsider your plans relative to Sharp Park Golf Course. Our relationship to the oceans of the world have changed. We need to get used to it.

Sincerely,

Victor Carmichael

d

Sincerely,

Victor Carmichael

Carroll, John (BOS)

From: Warner <warnersf@yahoo.com>
Sent: Saturday, February 25, 2017 1:47 PM
To: Board of Supervisors, (BOS)
Subject: Natural Areas Resource Plan appeal

Please forward to all supervisors-Dear Supervisor,

I urge you to reject the appeal of the Environmental Impact Report of the Significant Natural Resource Areas Management Plan. This important document outlines how the San Francisco Recreation & Park Department (RPD) can actively protect the City's urban forest, support and protect its biodiversity, and promote environmental justice. These lands allow people to get away from the hustle and bustle of city life, to get mental and physical breaks, and to experience nature without having to have the resources or ability to go to Yosemite, the central coast, or even Point Reyes. The quality of San Francisco's trails, vistas, and forests are unmatched in urban settings throughout the nation, and San Francisco's residents and visitors deserve a healthy environment.

These natural areas also support an array of native habitats and species, some found nowhere else in the world, such as the San Francisco garter snake and mission blue butterfly. In total, 140 species (67 animals & 73 plants) are presently or historically known to occur in these particular areas. Some of these species have state or federal protections. Responsible maintenance, as outline in the management plan, of these lands will enhance biodiversity and maintain populations of sensitive species.

Lastly, the plan provides guidelines for education, research, and stewardship programs. These landscapes offer a myriad of learning opportunities without having to leave San Francisco. Various schools and colleges, academies, museums, and children's programs use the natural areas for environmental education. This management plan further promotes these opportunities as a call for environmental justice. Without these natural areas we will lose these important teaching environments.

While some members of the public are concerned with the proposed tree management, the plan focuses on trees that are in poor or fair condition (80% of trees slated for removal), and replaces them with younger, healthier trees that support the urban forest and the overall environment over a 20 year period.

The Planning and Recreation and Park Commissions, after hearing testimony from more than 100 members of the public, voted to certify the NRMP's final Environmental Impact Report (EIR), and the Recreation and Park Commission unanimously adopted its California Environmental Quality Act (CEQA) findings and approved the plan.

Please reject this EIR appeal and uphold the Commissioners' certification of the EIR and the adoption Plan so that remnant landscapes and our ability to promote our forest, biodiversity, and recreational programming within the City limits are not compromised.

Sincerely,
Warner Graves
156 Beulah street
SF CA 94117

Sent from my iPhone

Carroll, John (BOS)

From: Al Luongo <al_luongo@yahoo.com>
Sent: Monday, February 27, 2017 1:47 PM
To: Board of Supervisors, (BOS)
Subject: Natural resources Plan

Please approve the Final Environmental Impact Report (FEIR) for RPD's Natural Resources Management Plan (NRMP, aka SNRAMP)!

We really need to get moving forward on this. I am a senior citizen on a fixed income and don't get around as much outside of SF as I would like to, so being able to get to natural areas nearby and accessible to public transport is very important to me!

Please route this to all supervisors.

Thanks,

Al Luongo.

Carroll, John (BOS)

From: Lance Carnes <lacarnes@gmail.com>
Sent: Monday, February 27, 2017 10:22 AM
To: Board of Supervisors, (BOS)
Subject: No on Sharp Park redevelopment

Dear Supervisors,

Please support the appeal to remove the Sharp Park golf course redevelopment from the EIR. It wastes City funds and hurts endangered species.

Thank you,
Lance Carnes

Carroll, John (BOS)

From: MARION CARLSON <mcar412@sbcglobal.net>
Sent: Sunday, February 26, 2017 8:33 PM
To: Board of Supervisors, (BOS)
Subject: NRMP

I am supporting the NRMP and urge them to reject the appeals.

Sincerely,
Marion Carlson
SF Resident

Carroll, John (BOS)

From: Linda Shaffer <lshaffer1@comcast.net>
Sent: Sunday, February 26, 2017 3:44 PM
To: Board of Supervisors, (BOS)
Subject: Please reject CEQA Appeals filed against certification of Final EIR for NRMP

To the Clerk of the Board:
Please forward this to all Supervisors. Thank you.

Supervisors,

The Yerba Buena Chapter of the California Native Plant Society urges the Board of Supervisors to reject the appeals and uphold the certification of the NRMP FEIR.

In its appeal, the San Francisco Forest Alliance fails to establish that the EIR is either incomplete or inaccurate. They use invented scenarios to make claims that statements in the EIR are false without providing any evidence that what they say is actually true. They also generalize from specific examples to produce possible inaccuracies in the EIR without establishing whether the examples they observed are typical. Finally, they accuse RPD's Natural Areas Program of violating CEQA by implementing the Management Plan in various ways prior to certification. They fail to accept, as clearly stated in the RTC, that the actions they list were taken as part of capital projects funded by bond \$, subjected to environmental review by the Planning Dept., and approved by the RecPark Commission. See RTC, Response G-3, pp. 4-19, 20 & 21 for more on this point.

The Wild Equity Institute (WEI) appeal appears to revolve in part around a disagreement with RPD over whether or not the proposed project at Sharp Park (which would impact 7 holes of the golf course there in various ways) constitutes a renovation of the golf course. WEI cites a prior agreement that any renovation would be separately evaluated under CEQA, and asks that the project be removed from this Management Plan and its EIR. While the Chapter understands the issue, it is concerned that if one portion of the document were removed, the rest of the document would be sent back to Planning for further evaluation. This would further delay the implementation of the Management Plan, an outcome the Chapter finds too costly, both monetarily and in time. Therefore, the Chapter has not supported WEI's request related to one project in one park, preferring to do the most good for many parks.

Some Chapter and board members, however, would support having that project removed IF certification of the EIR is preserved for the rest of the Management Plan, allowing its implementation to proceed immediately.

Thank you,

Ellen Edelson, Chapter President
Gerald Knezevich, Chapter Vice President
Linda Shaffer, Chapter Legislative Chair
Jake Sigg, Chapter Conservation Chair

Carroll, John (BOS)

From: Delia McGrath <deliaforpeace39@gmail.com>
Sent: Friday, February 24, 2017 7:03 PM
To: victor carmichael
Cc: Board of Supervisors, (BOS); Celeste Langille; Cynthia Kaufman; Barbara S Hubler; camille g; Carlos; deirdre finnegan; Dinah Verby; Margaret Goodale; Michael Andrews; Tim Cowan; Kirsten Schwind; Cynthia Knowles
Subject: Re: Letter to SF Supervisors re: Sharp Park Golf Course

Amazing, excellent letter, Victor. Thank you for inspiring me to get mine written — hopefully, later this evening. Peace, Delia

On Fri, Feb 24, 2017 at 6:54 PM, victor carmichael <vcarmichael@comcast.net> wrote:

Dear Board of Supervisors:

See attached letter.

Thank you,

V.Carmichael

Carroll, John (BOS)

From: Delia McGrath <deliaforpeace39@gmail.com>
Sent: Friday, February 24, 2017 9:23 PM
To: Board of Supervisors, (BOS)
Subject: Re: Sharp Park Golf Course decision
Attachments: copy for email.pages

To: Members of San Francisco Board of Supervisors

Re: Your decision on Tuesday, February 28, 2017 regarding the Sharp Park Gold Course located in Pacifica, CA.

I have attached a letter to you for your consideration in determining the best way forward about this matter. Thank you for your time and attention. Peace always, Delia McGrath, Concerned Resident of Pacifica.

Carroll, John (BOS)

From: Patrick Goudy <patrickgoudy@comcast.net>
Sent: Saturday, February 25, 2017 8:07 PM
To: Board of Supervisors, (BOS)
Cc: info@sfpublicgolf.org
Subject: Save Sharp Park Golf Course - Vote to Deny the Appeal

Dear Supervisors,

I am a San Francisco resident, a Sharp Park golfer, and a supporter of the Rec & Park Department's Natural Areas Plan, which among other things includes the Department's Laguna Salada Restoration Plan, to improve habitat in the Sharp Park wetlands for frogs and snakes, while maintaining the historic 18-hole golf course.

The Natural Areas Plan was approved December 15 by the Planning and Rec & Park Commissions, following a 20-year process of study, public input, and environmental review. These anti-golf groups that have for years been trying unsuccessfully to close the golf course, have appealed the Commissions' decisions to your Board. Please vote to deny that appeal.

Sharp Park is a beautiful, historic public course, built by golf's greatest architect, Alister MacKenzie. He also built Augusta National, considered the finest golf course in the world and home of the Masters Golf Tournament.

Sharp Park Golf Course is a wonderful environment where my sons and I have played golf together for many years and shared fond memories. This special place allows thousands of golfers each year to enjoy the outdoors, socialize and create lasting friendships. It provides employment and recreation for San Francisco, as well. It is a San Francisco treasure that needs to remain so future generations can enjoy its beauty and build their memories.

I've played golf my entire life and I know that golfers respect nature, the environment and would never harm the wildlife on or near the golf course.

Please do not allow the anti-golf groups to obstruct the City's plans to improve habitat while maintaining the golf course.

It is time to move forward. Please vote to deny the appeal, and to approve the Natural Areas Plan. Support your Recreation and Park Department's carefully-developed and balanced plan to recover frog and snake habitat in the Sharp Park wetlands, while saving the beautiful, popular, and historic 18-hole golf course.

Thank you for your service to the community and for considering my request.

Sincerely,

**Patrick Goudy
3090 23rd Avenue
San Francisco, CA 94132**

Carroll, John (BOS)

From: mneumanncm@gmail.com on behalf of Michael Neumann <mike@neumanncm.com>
Sent: Saturday, February 25, 2017 8:19 AM
To: Board of Supervisors, (BOS)
Subject: Save Sharp Park Golf Course

Hello Supervisors,

Please vote to save Sharp Park Golf Course.

Thank you,

--
Mike Neumann
951 Chenery Street
San Francisco, CA 94131
415-640-1709

Carroll, John (BOS)

From: Gerald Knezevich <gruicaknez@yahoo.com>
Sent: Monday, February 27, 2017 11:14 AM
To: Board of Supervisors, (BOS)
Subject: Support for Natural Areas Program, please forward to all supervisors

As a resident of San Francisco I would like to voice my support for the Natural Areas Program and would request that the Supervisors reject the appeals of the FEIR for the Natural Resources Management Plan.

The Plan- all chapters, including Sharp Park-benefits the species and habitats. The idea to split out sharp Park is totally ill-advised since we need to take these initial restoration actions for the frog and the snake.

There are no CEQA violations, and therefore the appeals should be rejected.

The EIR should be upheld because it is adequate and exhaustive. Please uphold the EIR for the NAP. The SF Planning Dept. has done an exemplary job.

Further delay of the NRMP would mean further degradation of species and habitats at all of the City's 32 Natural Areas.

Please forward my message to all Supervisors.

Respectfully
Gerald Knezevich
1386 20th. Ave.
San Francisco

Carroll, John (BOS)

From: GLORIA KOCH <sierrasatori@gmail.com>
Sent: Monday, February 27, 2017 1:16 PM
To: Board of Supervisors, (BOS)
Cc: Sheehy, Jeff (BOS)
Subject: Support Natural Areas EIR 2/28, please forward to all Supervisors

Dear Supervisors,

Please certify the Final Environmental Impact Report (FEIR) for the Natural Resources Management Plan (NRMP). Please reject the appeals.

1. The Plan - all chapters, including Sharp Park - benefits the species and habitats. Do not split out Sharp Park, we need to continue these well planned initial restoration actions for the frog and the snake.
2. There are no CEQA violations, and therefore the appeals should be rejected.
3. The EIR should be upheld because it is adequate and exhaustive. Please uphold the EIR for the Natural Areas Plan. The SF Planning Department has done an exemplary job.
4. Further delay of the NRMP would mean further degradation of species and habitats at all of the City's 32 Natural Areas.
Further delay is a distraction and misuse of city resources.
5. The city should take pride in, and support the solid environmentally sensitive work both in plan and already being done in Sharp Park and the Natural Areas.

Sincerely,

Gloria Koch

Carroll, John (BOS)

From: Williams, Jim <JWilliams@tpg.com>
Sent: Monday, February 27, 2017 1:06 PM
To: Board of Supervisors, (BOS)
Cc: rharrisjr1@gmail.com
Subject: Support Natural Areas Program and Golf at Sharp Park

San Francisco Board of Supervisors
City Hall, Room 244
1 Dr. Carlton B. Goodlett Pl.
San Francisco, CA. 94104
Board.of.supervisors@sfgov.org

Re: Support Natural Areas Program and Golf at Sharp Park
Urge Supervisors to deny appeal of Natural Areas Final EIR
Case No. 2005.0912E
Hearing: Feb. 28, 2017

Dear Supervisors,

I support the Planning Commission's approval of the Final EIR for the Rec & Park Department's Natural Areas Plan, which includes habitat recovery for frogs and snakes, while maintaining the historic 18-hole Sharp Park Golf Course.

Please deny the appeals from the Commission's decision.

I am an avid golfer but more importantly an avid environmentalist. We have a tremendous community asset in Sharp Park Golf Course, and I want to assure that it will continue to have this as a resource and recreation area for generations to come.

I urge your commissions to approve the Final EIR for Rec & Park's Natural Areas Program, which includes the department's balanced plan to save the beautiful and historic 18-hole Sharp Park Golf Course, while recovering frog and snake habitat in the wetlands.

Sharp Park Golf Course, "the poor man's Pebble Beach," is one of San Francisco's great public recreation spaces and architectural treasures. It is designated a Historical Resource Property under CEQA, a City of Pacifica Historical Site, and one of the 50 "Best Municipal Courses" in America by Golfweek Magazine. It is friendly, beautiful, and reasonably-priced, and was built in 1932 by history's greatest golf architect, Alister MacKenzie. It is a true melting pot: the golfers are a diverse collection of men, women, seniors, juniors and students, including all categories of age, gender, race, and social class.

Anti-golf activists have tried for years to close the golf course and to obstruct and delay Rec & Park's Sharp Park Plan. Their current call to "sever" Sharp Park from the Natural Areas Final EIR is their latest tactic. A virtually identical effort to "sever" Sharp Park from the EIR failed at the Board of Supervisors in December, 2012. To sever Sharp Park at this point – after years of work, countless public hearings, and millions of dollars of staff time, consultants, and public expenditure (including the \$10 Million Pacifica Recycled Water Project, completed in

2012, which provides recycled irrigation water to the golf course), would be an extravagant, ridiculous waste of public time, money, and effort.

On at least a dozen occasions over the past several years, numerous public agencies and courts have rejected attempts to delay and hinder Rec & Park's Sharp Park Plan. Among them the San Francisco Rec & Park Commission, Parks, Recreation and Open Space Advisory Committee (PROSAC), Planning Commission, Public Utilities Commission, Mayor's Office, the US Fish & Wildlife Service, Army Corps of Engineers, California Regional Water Quality Control Board, California Coastal Commission, San Francisco Superior Court, San Mateo County Superior Court, US District Court for the Northern District of California, and the Ninth Circuit US Court of Appeals. In their decisions, all of these local, state, and federal agencies and courts have rejected similar arguments by the same golf opponents who now ask you to "sever" Sharp Park from the Natural Areas Final EIR.

Please reject the arguments to sever Sharp Park. Please approve the Natural Areas Final EIR, and approve the Natural Areas Plan.

Thank you for your service to the community and for considering my request.

Jim Williams
345 California St. Suite 3300
San Francisco, CA 94104

This message is intended only for the person(s) to which it is addressed and may contain privileged, confidential and/or insider information. If you have received this communication in error, please notify us immediately by replying to the message and deleting it from your computer. Any disclosure, copying, distribution, or the taking of any action concerning the contents of this message and any attachment(s) by anyone other than the named recipient(s) is strictly prohibited.

Carroll, John (BOS)

From: Barbara Alvarez <barbaraalvarez1936@gmail.com>
Sent: Saturday, February 25, 2017 5:13 PM
To: Board of Supervisors, (BOS)
Subject: Support NRMP

To all Supervisors i support NRMP and urge them to reject the appeals.

In support,

Barbara Kockerols - Avarez

Carroll, John (BOS)

From: Richard Harris <richard@sfpubicgolf.org>
Sent: Monday, February 27, 2017 12:22 PM
To: BOS Legislation, (BOS)
Cc: bplater@wildequity.org; desai@npca.org; ggas@goldengateaudubon.org; office@sequoia-audubon.org; kerry@savethefrogs.com; deesel91@gmail.com; SFForestNews@gmail.com; tom@intrinsicdevices.com; bo@slotelaw.com; Julia4th@yahoo.com; Bradley, Stacy (REC); Givner, Jon (CAT); Stacy, Kate (CAT); Byrne, Marlena (CAT); Rahaim, John (CPC); Sanchez, Scott (CPC); Gibson, Lisa (CPC); Starr, Aaron (CPC); Rodgers, AnMarie (CPC); Hue, Melinda (CPC); Ionin, Jonas (CPC); BOS-Supervisors; BOS-Legislative Aides; Calvillo, Angela (BOS); Somera, Alisa (BOS); Lew, Lisa (BOS); Carroll, John (BOS)
Subject: San Francisco Public Golf Alliance / Brief in the matter of SNRAMP FEIR, BoS File 170044
Attachments: SFPGA.Nat.Areas.FinalEIR.Commt.12.12.16.pdf; SFPGA.Ltr.BofS.re.NAP.Appeal.2.17.17 (00003480x9CE40).DOC
Categories: 170044

Brent Jalapa, Legislative Clerk

Board of Supervisors – Clerk’s Office

Thanks for confirming our filing on Feb. 17 of the SF Public Golf Alliance letter in the matter of BoS File 170044. Because you cannot at this point add to the online Board Packet, and in the event the Appellants or others in the “cc” block above have not previously seen the Public Golf Alliance Feb. 17 letter, I provide it to them by attaching it – together with the Dec. 12, letter which constitutes Attachment 1 to the Feb. 17 letter -- to this e-mail.

Best Regards,

Richard Harris

San Francisco Public Golf Alliance

Phone: (415) 290-5718

From: BOS Legislation, (BOS) [mailto:bos.legislation@sfgov.org]

Sent: Monday, February 27, 2017 10:02 AM

To: richard@sfpubicgolf.org; BOS Legislation, (BOS)

Cc: 'Bo Links'

Subject: RE: Need to Correct the Record / Reply Brief in the matter of SNRAMP FEIR, BoS File 170044 / Board of Supervisors Hearing Feb. 28, 3 p.m.

Good morning Mr. Harris.

I am writing to confirm receipt of the 2.17.17 brief. While I cannot correct the Board Packet as published on our website, I have verified the brief has been distributed to the Supervisors and is part of the official file.

Regards,

Brent Jalipa

Legislative Clerk

Board of Supervisors - Clerk's Office

1 Dr. Carlton B. Goodlett Place, Room 244

San Francisco, CA 94102

(415) 554-7712 | Fax: (415) 554-5163

brent.jalipa@sfgov.org | www.sfbos.org

SAN FRANCISCO

PUBLIC GOLF ALLIANCE



235 Montgomery St., Suite 400, San Francisco, CA 94104 • 415-290-5718 • info@sfpubicgolf.org



December 12, 2016

San Francisco Planning Commission
1650 Mission Street, Suite 400
San Francisco, CA 94103

San Francisco Park & Recreation Commission
501 Stanyan St.
San Francisco, CA. 94117

**Re: Natural Areas Plan, Final EIR
Planning and Rec & Park Commissions Joint Hearing, Dec. 15, 2016**

**San Francisco Public Golf Alliance supports the Final EIR,
Including the RPD's 18-hole Sharp Park Conceptual Restoration Plan,
and urges the Commissions not to "sever" Sharp Park.**

Dear Commissioners,

EXECUTIVE SUMMARY

Sharp Park Golf Course, built in the early 1930's by the preeminent architect Alister MacKenzie in collaboration with John McLaren, is one of the best-known and best-loved jewels in San Francisco's parks system. It is known nation- and world-wide as an historic cultural landscape and public golf treasure, and is ranked as one of the 50 Greatest Municipal Courses in America. It is also one of the most reasonably-priced public courses in the Bay Area, beloved by golfers across all gender, age, racial, and economic strata.

Since the issuance of a California Coastal Conservancy-sponsored study in 1992, the Rec & Park Department has pursued a long-term program of renewing and improving the historic golf links, while protecting and enhancing habitat for endangered snakes and frogs that live in the Sharp Park wetlands. The San Francisco Public Golf Alliance supports this balanced program. We are optimistic that under provisions of the Final EIR – with its Revisions to Mitigation Measures M-CP-7 and M-RE-6 requiring consultation with an expert in Alister MacKenzie and historic golf architectural renovation – the city will be able to protect the species, the public recreation, and the historic golf architecture at Sharp Park. These are all very important public resources at Sharp Park, and we must seek the proper balance – as the Coastal Commission did in the case of the Pump House Project.

Your two commissions -- Recreation and Park, and Planning – together with the Public Utilities Commission, have repeatedly since 2000 developed plans, adopted resolutions, and spent millions of dollars in support of the Sharp Park Golf Course. This includes the \$10 Million Pacifica Recycled Water Project, specifically designed to deliver recycled irrigation water to the course. Completed in 2012, that project makes Sharp Park one of the few courses between San Francisco and San Jose with a recycled water source.

Between 2012-2015 these plans have received regulatory approvals from the US Fish & Wildlife Service, US Army Corps of Engineers, California Coastal Commission, and San Francisco Regional Water Quality Control Board. Challenges from anti-golf activists have been rejected, and lawsuits dismissed, by the San Francisco Superior Court, San Mateo County Superior Court, US District Court for the Northern District of California, and the US Court of Appeals for the Ninth Circuit.

Now, the same anti-golf activists whose announced goal is to close the golf course, are asking Your Commissions to “sever” Sharp Park from the Natural Areas Final EIR – and thus delay needed habitat recovery and restoration work at the golf course. This is a bad idea, and we urge you to reject “severance”.

Sharp Park has been part of the Rec & Park Department’s Significant Natural Resource Areas Management Plan since the program’s inception. An earlier attempt by these same anti-golf activists to “sever” Sharp Park from the Natural Areas Program – virtually identical to arguments currently being made to your two Commissions -- died in committee at the San Francisco Board of Supervisors in 2012.

Preserving this precious public resource is our collective duty, and the specific responsibility of our public officials, who are trusted stewards of our parks, recreation, and great public architectural facilities, especially those such as Sharp Park Golf Course that have been loved and enjoyed by millions of people for nearly a century.

For these reasons and more – all of which are thoroughly footnoted to original source documents in the following sections of this letter – the 6,500-plus members of the non-profit, pro-bono San Francisco Public Golf Alliance urge Your Commissions to proceed with the Natural Areas Final EIR, including the 18-hole Sharp Park restoration plan.

II. Background

A. Sharp Park is a Significant Recreational and Historical Resource

Sharp Park Golf Course, opened in 1932 and located adjacent to Salada Beach in Pacifica, is a San Francisco-owned seaside public golf links, designed by preeminent architect Dr. Alister MacKenzie¹, and often called “The Poor Man’s Pebble Beach.” It is: (1) one of the most reasonably-priced golf courses in the Bay Area²; (2) heavily-played³; (3) recognized by the San Francisco Planning Department as an “historic resource” under the California Environmental Quality Act (CEQA)⁴; (4) recognized by the California Coastal Commission as a “sensitive coastal resource area” under the Coastal Act for its seaside public golf recreational values⁵; (5) designated an “historic site” by the City of Pacifica General Plan⁶ and by the Pacifica Historical Society⁷; (6) designated a nationally-significant “At-Risk Cultural Landscape” by the Washington D.C.-based Cultural Landscape Foundation⁸; and (7) recognized (along with Harding Park) as one of America’s 50 Best Municipal Courses by Golfweek Magazine.⁹

¹ Dr. MacKenzie, inducted into the World Golf Hall of Fame, was the architect of several of the world’s most highly-esteemed courses, including Augusta National (home of the annual Masters Tournament) and the Cypress Point Club at Monterey, CA. World Golf Hall of Fame, “Alister MacKenzie” <http://www.worldgolfhalloffame.org/alister-mackenzie/> Sharp Park is one of only a handful of municipal courses in the world built by Dr. MacKenzie, and his only public seaside links.

² A chart compiled by the San Francisco Recreation and Park Department and presented in November, 2009 to the Park, Recreation, and Open Space Advisory Committee – the Department’s citizens’ advisory committee – shows that Sharp Park’s greens fees are among the lowest for 18-hole public courses in the San Francisco Bay Area. San Francisco Recreation & Park Department, Chart: <https://dl.dropboxusercontent.com/u/30028085/SFRPD.Survey.Bay.Area.Golf.Fees.2009.pdf>

³ Annual play figures at Sharp Park vary with the weather. In Fiscal Year 2013-2014, 45,622 18-hole rounds were played at Sharp Park, more than at any of the city’s other municipal courses. See SF Rec & Park Department, Golf Revenue & Expenditure Report, for FY 13-14: <https://dl.dropboxusercontent.com/u/30028085/%2713-%2714%20Actuals.pdf>

⁴ San Francisco Planning Dept., Historic Resource Evaluation Response (“HRER”), February 15, 2011, at Page 2: https://dl.dropboxusercontent.com/u/30028085/SF_Planning_Dept_Historic_2_8_2011.pdf

⁵ California Coastal Commission, Staff Report, April 3, 2015, at pp. 18-19: <http://documents.coastal.ca.gov/reports/2015/4/th8a-4-2015.pdf>. In its April 16, 2015 ruling granting the Permit for the Pump House Project, the Coastal Commission unanimously adopted the Staff Report and its findings. *Id.*, April 3, 2015, at page 5.

⁶ The golf course is designated a Pacifica “Historic Site” in the Pacifica General Plan, Historic Preservation Element and Historic Sites Map, at pages 95 and 95a. <http://www.cityofpacific.ca.org/civica/filebank/blobdload.asp?BlobID=3443> .

⁷ The City of Pacifica’s official historian, the Pacifica Historical Society, by Resolution dated June 14, 2011, designated Sharp Park Golf Course a Pacifica “historical and cultural resource”: https://dl.dropboxusercontent.com/u/30028085/Pacific_Historical_Society_Resolution_6-14-11.pdf

⁸ Cultural Landscape Foundation, “Sharp Park Golf Course Threatened With Closure,” About TCLF, At Risk Landscapes: <http://tclf.org/landslides/sharp-park-golf-course-threatened-closure> ; <http://tclf.org/about> ; <http://tclf.org/stewardship/about-landslide?destination=search-results> ; <http://tclf.org/landscapes/sharp-park-golf-course>

Congresswoman Jackie Speier¹⁰, the County of San Mateo¹¹, the cities of Pacifica¹² and San Bruno¹³, and the Chambers of Commerce of both San Francisco¹⁴ and Pacifica¹⁵ have all urged that Sharp Park Golf Course be preserved.

Specifically, the City of Pacifica in the current Natural Areas Plan EIR process, has called Sharp Park Golf Course “an important resource that is shared by the two cities [Pacifica and San Francisco] as well as the rest of San Mateo County,” and officially endorsed the Natural Areas Draft EIR, and called upon San Francisco to “. . . mov[e] forward the work called for in the Significant Natural Resources Areas Management Plan and in the preservation of the Sharp Park Golf Course.”¹⁶

1. Sharp Park is the People’s Course, the “Poor Man’s Pebble Beach,” enjoyed by a broad and diverse group of men, women, seniors, and students across the full range of age, gender, race, and income.

Long known as “the poor man’s Pebble Beach,” Sharp Park is a mere 15-minute freeway ride from San Francisco’s southern neighborhoods, and has historically been a favorite of low-income golfers, seniors, students, and racial and ethnic minorities. In 1955, Sharp Park played an important role in the racial integration of public recreation in America, when it hosted the inaugural championship tournament of the Western States Golf Association, one of the country’s oldest and largest African-American golfing societies.¹⁷

⁹ Golfweek, Best Municipal Courses (2014) (Sharp Park rated No. 50, Harding No. 17): <http://golfweek.com/news/2014/jun/25/golf-courses-municipal-golfweeks-best-travel/>

¹⁰ Statement, Congresswoman Jackie Speier re Sharp Park, Nov. 6, 2009: <https://dl.dropboxusercontent.com/u/30028085/SFPGA.Speier.Stmt.Save.Sharp.11.6.09.pdf>

¹¹ San Mateo County Board of Supervisors, Resolution G69145, December 18, 2007: http://sharppark.savegolf.net/data/smbos_res.pdf

¹² Pacifica City Council, Resolution 63-2007, December 10, 2007: http://sharppark.savegolf.net/data/cop_res.pdf

¹³ Letter, San Bruno Mayor Jim Ruane to Hon. Ed Lee, Dec. 22, 2011: https://dl.dropboxusercontent.com/u/30028085/12-22-11_Mayor_Ruane_Letter.pdf

¹⁴ Letter, San Francisco Chamber of Commerce Sr. Vice President Jim Lazarus to Hon. Ed Lee, Dec. 14, 2011 https://dl.dropboxusercontent.com/u/30028085/Chamber_of_Commerce_SaveSharpPark.pdf

¹⁵ Letter, Pacifica Chamber of Commerce to Pacifica Mayor Mary Ann Nihart, March 26, 2011: <https://dl.dropboxusercontent.com/u/30028085/Pacifica.CofC.ltr.SFMayor.3.26.11.Sh.Pk..pdf>

¹⁶ Letter, Pacifica Mayor Mary Ann Nihart to San Francisco Planning Department, October 26, 2011 <https://dl.dropboxusercontent.com/u/30028085/Pacifica.ltr.SFPlng.SNRAMP%20EIR.10%2C26%2C11.pdf>

¹⁷ Letter, October 5, 2011. from Nathaniel Jackson, President, Bay Area Golf Club of Northern California,: <https://dl.dropboxusercontent.com/u/30028085/Ltr.Bay.AreaGC%20to%20MayorLee.10.5.11.pdf>

Sharp Park is a favorite venue for several San Francisco and North Peninsula high school boys' and girls' golf teams, as well as Senior and ethnic minority golf associations, including the Bay Area Golf Club of Northern California¹⁸ Mabuhay Golf Club¹⁹, Sons in Retirement²⁰, Mexican American Golf Association²¹, and Golden Hill Golf Club²², all of which have written letters calling for preservation of the 18-hole golf course.

2. With its Alister MacKenzie architecture, seaside location, and great beauty, Sharp Park is widely admired as a national and international golf treasure.

The late Ken Venturi, San Francisco favorite son, US Open Champion, and World Golf Hall of Fame member, called Sharp Park Dr. MacKenzie's "great gift to the American public course golfer."²³ And state, national, and world golf associations, including the United States Golf Association²⁴, Northern California Golf Association²⁵, Southern California Golf Association and Pacific Women's Golf Association²⁶, Golf Course Superintendents Association of America²⁷, Professional Golfers' Association of America²⁸, World Golf Foundation²⁹, and the Alister MacKenzie Society of Great Britain and Ireland³⁰, have called upon San Francisco to save and protect Sharp Park Golf Course.

¹⁸ Letter, October 5, 2011, from Nathaniel Jackson, etc., Id.

¹⁹ Mabuhay Golf Club, Letter, March 29, 2011
<https://dl.dropboxusercontent.com/u/30028085/SFPGAMabuhayLtr32911.pdf>

²⁰ Sons in Retirement, Letter, June 2, 2010:
<https://dl.dropboxusercontent.com/u/30028085/SFPGA.SIRS.Letter.Sharp%20Park.6.2-10.pdf>

²¹ Mexican American Golf Association, San Jose Chapter, Letter, March 5, 2011:
<https://dl.dropboxusercontent.com/u/30028085/SFPGAMAGALtr3511.pdf>

²² Golden Hill Golf Club, Letter, June 17, 2011:
<https://dl.dropboxusercontent.com/u/30028085/SFPGAGoldenHillLtr61711.pdf>

²³ Letter, Dec. 11, 2011, Ken Venturi to Mayor Ed Lee
<https://dl.dropboxusercontent.com/u/30028085/Ken%20Venturi%20Ltr%20re%20Sharp%2C%2012.11.11.pdf>

²⁴ Letter, USGA Executive Director Mike Davis to Mayor Ed Lee, Dec. 14, 2011:
https://dl.dropboxusercontent.com/u/30028085/USGA%20Ltr.Mike.Davis_to_MayorLee_Sharp_Park.pdf

²⁵ Letter, March 26, 2015, Northern California Golf Association to California Coastal Commission:
<https://dl.dropboxusercontent.com/u/30028085/NCGA.Ltr.CCC.re.Sh.Pk.3.26.15.pdf>

²⁶ Letter, Sept. 28, 2009 California Alliance for Golf (incl. So.Cal.Golf Assn. and Pacific Women's Golf Assn):
<https://dl.dropboxusercontent.com/u/30028085/CAG-SharpPark-letter.9.28.09.pdf>

²⁷ Letter, October 6, 2011, GCSAA to San Francisco Planning Department (Copy attached as Exhibit):
<https://dl.dropboxusercontent.com/u/30028085/GCSAA.Ltr.Plng.10.6.11.pdf>

²⁸ Letter, Sept. 27, 2011, PGA of America to San Francisco Planning Department
<https://dl.dropboxusercontent.com/u/30028085/PGA%20of%20Amer.Ltr.to.Plng.9.27.11.pdf>

²⁹ Letter, World Golf Foundation, July 23, 2009:
<https://dl.dropboxusercontent.com/u/30028085/WorldGolfFdnLtr.Plng.9.29.11.pdf>

B. Sharp Park is also home of protected frogs and snakes, which were not found at Sharp Park until years after golf course construction converted the previously-brackish Laguna Salada into a “picturesque freshwater pool.”

Following trial in 2015, San Francisco Superior Court Judge Garrett Wong on May 28, 2015 dismissed a Sharp Park lawsuit brought by anti-golf groups against San Francisco and its agencies, including the Board of Supervisors, Planning Commission and Planning Department. Among other things, Judge Wong found:

“The golf course at Sharp Park was constructed in 1932 . . . The seawall along the western edge of Sharp Park was originally constructed between 1941 and 1952 and eliminated the historic hydrologic connection between the Pacific Ocean and the wetland complex. . . . The first recorded sighting of the California red-legged frog or the San Francisco garter snake at Sharp Park was in 1946, after the seawall was constructed [citation omitted]. Red-legged frogs cannot live in saline conditions [citation omitted], and before the seawall, Laguna Salada was regularly inundated with seawater. . . .”³¹

A contemporaneous newspaper description of John McLaren’s planning and Alister MacKenzie’s design vision for Sharp Park Golf Course that appeared in the February 23, 1930 San Francisco Chronicle reported: “More than half of the holes border on Lake Salada, which John McLaren, superintendent of parks, transformed from a salt water marsh into a picturesque fresh-water pool.”³²

San Francisco’s plan to recover habitat in Sharp Park’s wetlands for the threatened California red-legged frog and its predator the San Francisco garter snake grew out of the California Coastal Conservancy-sponsored “Laguna Salada Resource Enhancement Plan,” a 1992 study authored by Philip Williams & Associates (PWA).³³ The PWA plan called for **“use which is compatible with the natural resource values of the site and with the golf course operation”**³⁴ including habitat enhancement for the frogs and snakes, pumping to manage water levels and quality, dredging tules from ponds and wetlands, maintaining the Sharp Park seawall, continuing the 18-hole golf course, and developing a recycled water irrigation system for the course.³⁵

³⁰ Alister MacKenzie Society of Great Britain & Ireland, letter, April 28, 2009
<https://dl.dropboxusercontent.com/u/30028085/Mackenzie%20Society%20Ltr.Save.Sharp.4.28.09.pdf>

³¹ *Wild Equity Institute, et al. vs. City and County of San Francisco*, San Francisco Superior Court, No. CPF 14-513613, Order Denying Writ of Mandate, May 28, 2015. at page 2:
<https://dl.dropboxusercontent.com/u/30028085/SFPGA.SFSup.Ct.Wld.Eq.Dismiss.Jn.1.15.pdf>

³² San Francisco Chronicle, Feb. 23, 1930, “Chandler Egan Will Inspect Sharp Park Golf Course”: <https://dl.dropboxusercontent.com/u/30028085/SFChron.2.23.30.EganWillInspectSharp.pdf>

³³ Philip M. Williams Associates, 1992, “Laguna Salada Resource Enhancement Plan:
<https://dl.dropboxusercontent.com/u/30028085/SFPGA.PWilliams.Laguna.Salada.Plan.1992f.pdf> , at p. 35.

³⁴ Philip M. Williams Associates, *Id.* at p. 35.

³⁵ Philip M. Williams Associates, *Id.*, at pp. 37-51

Before construction of the golf course at Sharp Park in the early 1930's, PWA concluded, Laguna Salada "is not likely to have supported the San Francisco garter snake, which feeds on freshwater frogs":

"Prior to development as a golf course in the 1920's and 1930's, the site, referred to as Laguna Salada (Salty Lake), consisted of ranch lands, sand dunes, and a large lagoon. . . the common name of Salt Lake Valley³⁶ suggests that the lagoon was brackish to saline. The absence of trees also suggests a more saline environment. . . Given the saline nature of the pond, it is not likely to have supported the San Francisco garter snake, which feeds on freshwater frogs. The construction of the golf course modified the hydrologic connection with the ocean. . . tidal exchange was greatly reduced and eventually eliminated. The elimination of saline water during the spring months allowed freshwater vegetation to become established. . .³⁷

To the same effect are (1) an historic photograph, taken before the golf course was built, showing artichoke fields surrounding Laguna Salada field³⁸, and (2) the October 2, 2012 US Fish and Wildlife Service Biological Opinion, which states:

"Little is known about the history of San Francisco garter snake and California red-legged frog in the action area prior to the completion of Sharp Park Golf Course in 1932. The species were first documented in the action area in 1946."³⁹

³⁶ A copy of an 1892 US Geological Survey map of the area, included as Figure 2 to the Williams Report, shows Laguna Salada located in a valley named "Salt Valley":
<https://dl.dropboxusercontent.com/u/30028085/Sh.Pk.USGS.Topo.Map.1892.pdf>

³⁷ Philip M. Williams Associates, 1992, "Laguna Salada Resource Enhancement Plan: *supra* (at fn. 33), pp 2-3.

³⁸ An early 20th Century panoramic photograph of the Laguna Salada area, taken from the hill south of the lagoon and looking north with Mt. Tamalpais in the distant background, shows Laguna Salada surrounded by artichoke fields: <https://dl.dropboxusercontent.com/u/30028085/SFPGA.Artichokes.Sharp.early.20.cent..pdf>

³⁹ US Fish & Wildlife Service, Oct. 2, 2012, at p. 28:
(<https://dl.dropboxusercontent.com/u/30028085/USFWS%20BiOp.pdf>)

The Biological Opinion was the result of a 17-month consultation between San Francisco Rec & Park and the US Fish and Wildlife Service and Corps of Engineers.

III. San Francisco has for years worked to balance the recreational, historical, and environmental values at Sharp Park, and this work has been upheld –over objections from the same anti-golf activists who are today calling for Sharp Park to be “severed” from the Final EIR -- by San Francisco’s Rec & Park, Planning, and PUC commissions, and by the lead Resource Agencies, including US Fish & Wildlife Service, Army Corps of Engineers, Regional Water Quality Control Board, and California Coastal Commission. And these approvals have been upheld by the state and federal courts.

A. In 2009, Rec & Park adopted, and the Commission approved, the Laguna Salada Conceptual Restoration Plan, to enhance wetland habitat at Sharp Park, while retaining the historic 18-hole golf course.

The San Francisco Rec and Park Commission in December, 2009, unanimously approved the Laguna Salada Conceptual Restoration Plan, to recover habitat for the California red-legged frog and the San Francisco garter snake in the Sharp Park wetlands, while preserving the historic 18-hole golf course.⁴⁰ Before the Commission approved it, the 18-hole plan was overwhelmingly endorsed by the Parks, Recreation and Open Space Advisory Committee (PROSAC).⁴¹ The plan was recommended by the Department in November, 2009, based upon a six-month study and report by the environmental consulting firm Tetra-Tech.⁴² Throughout this process, environmental activist groups vigorously but unsuccessfully lobbied to close the golf course.⁴³

B. Anti-golf activists admit that the Sharp Park Plan now before Your Commissions as part of the Natural Areas Plan is “substantially the same plan” as the Pump House Project, approved in October, 2012 by a US Fish & Wildlife Service Biological Opinion.

In its October 31, 2011 Comment letter to the Planning Department on the Natural Areas Plan, the anti-golf activist group Wild Equity Institute admits that “the Fish and Wildlife Service has already reviewed **substantially the same plan** that is proposed in the [RPD’s] preferred alternative for Sharp Park Golf Course.”⁴⁴ (That is to say, the same

⁴⁰ San Francisco Recreation and Park Commission Minutes, Dec. 17, 2009, Resolution No. 0912-018, at pp. 40-41 <http://sfrecpark.org/wp-content/uploads/121709-minutes1.pdf>

⁴¹ Park, Recreation, and Open Space Advisory Committee (PROSAC), Minutes, Dec. 1, 2009, at page 4: https://dl.dropboxusercontent.com/u/30028085/SharpParkPROSACResol%27ns12109_00000.pdf

⁴² Tetra-Tech, Sharp Park Conceptual Alternatives Report, November, 2009: http://sfmea.sfplanning.org/2005.0912E_DEIR6.pdf (at pages 4-5 46-47, and 59-60) This November, 2009 Report updated and generally followed the approach originally recommended by the 1992 PWA Plan (see footnotes 16 and 23, *supra*).

⁴³ The anti-golf campaign was announced in an August 19, 2009 press release from Center for Biological Diversity: <https://dl.dropboxusercontent.com/u/30028085/CBD.Prs.Rls.re.Scientist.Ltr.Sh.Pk.8.19.09.pdf>

⁴⁴ Letter, Wild Equity Institute to SF Planning Dept., Oct. 31, 2011, at 6th unnumbered page, 1st full paragraph: <https://dl.dropboxusercontent.com/u/30028085/Wild.Eq.Ltr.SNRAMP.EIR.11-16.11.pdf>

Sharp Park Plan which is a component of the Natural Areas Plan, currently before Your Commissions.)

That US Fish and Wildlife Service review resulted in a Biological Opinion and Incidental Take Statement, dated October 2, 2012⁴⁵, for the first phase of the Rec & Park's long-term Sharp Park plan, including partial dredging of the ponds and connecting channel, plus worker safety and other improvements to the golf course's flood-control pumping system.

This project was entitled the Sharp Park Safety, Infrastructure Improvement, and Habitat Enhancement Project ("Pump House Project").⁴⁶⁴⁷ Following a 17-month study, the USFWS on October 2, 2012 concluded that, subject to a set of Conservation Measures designed to minimize the project's potential impacts, the Pump House Project "is not likely to jeopardize the continued existence of the California red-legged frog or San Francisco garter snake" (*Id.*, at page 38).⁴⁸⁴⁹

C. Federal Trial and Appeals courts dismiss anti-golf lawsuit filed in 2011 by Sierra Club, Wild Equity Institute, Center for Biological Diversity, Sequoia Audubon, Surfrider Foundation, and National Parks Conservation Association.

On March 2, 2011, Wild Equity Institute, Center for Biological Diversity, National Parks Conservation Association, Surfrider Foundation, Sequoia Audubon, and the Sierra Club filed a lawsuit against San Francisco, Mayor Edwin Lee, and Rec & Park General Manager Phil Ginsburg in the US District Court for Northern California, for declaratory and injunctive relief under the Endangered Species Act, based on allegations of "unlawful take" (killing and other damage) of the California red-legged frog and San Francisco Garter Snake at the Sharp Park Golf Course.⁵⁰

⁴⁵ Biological Opinion and Incidental Take Statement, US Fish and Wildlife Service (USFWS), October 2, 2012 <https://dl.dropboxusercontent.com/u/30028085/USFWS%20BiOp.pdf>

⁴⁶ Biological Opinion and Incidental Take Statement, *Id.*, Project Description, at pp. 5-6

⁴⁷ The Pump House Project is discussed in detail below, in Section III.D of this letter.

⁴⁸ Biological Opinion and Incidental Take Statement, *supra* (fn. 46)

⁴⁹ Before reaching its conclusions, the USFWS considered objections and arguments from Wild Equity and Center for Biological Diversity's consultants ESA/PWA and Peter Bayh. This can be seen from the USFWS Biological Opinion. *Id.* Literature Cited at pages 48-49, which includes a lengthy report from consultant ESA-PWA, dated February 9, 2011, entitled "Conceptual Ecosystem Restoration Plan and Feasibility Assessment, Laguna Salada, Pacifica, California. Prepared for Wild Equity Institute and Center for Biological Diversity." <https://dl.dropboxusercontent.com/u/30028085/ESA-PWA.2011.Laguna.Salada.Plan%2C%202.10.11.pdf>

⁵⁰ *Wild Equity Institute, Center for Biological Diversity, et al, vs. City and County of San Francisco, U.S. Dist.Ct.N.D.Cal., No. C 11-00958 SI, Complaint for Declaratory and Injunctive Relief*, filed March 2, 2011: <https://dl.dropboxusercontent.com/u/30028085/WildEq.vs.San%20Fran.USDC.Complaint.3-2-11.pdf>

Following issuance of the USFWS Biological Opinion and Incidental Take Statement on October 2, 2012⁵¹, U.S. District Court Judge Susan Illston on December 6, 2012 ruled that the lawsuit was mooted by the Biological Opinion and Incidental Take Statement, and dismissed the lawsuit.⁵² On March 25, 2015, the U.S. Court of Appeals for the Ninth Circuit dismissed the plaintiffs' appeal.⁵³

D. In 2014, San Francisco Planning and Rec & Park Commissions and Board of Supervisors approved the Sharp Park Pump House Project; the approvals were upheld in 2015 by San Francisco Superior Court.

On January 16, 2014 – and over opposition from anti-golf activists -- the San Francisco Planning Commission unanimously approved a Preliminary Mitigated Negative Declaration for the Sharp Park Pump House Project.⁵⁴ The Rec & Park Commission – again over opposition from anti-golf activists -- approved the Mitigated Negative Declaration and the Pump House Project at its January 23, 2014 meeting.⁵⁵ And the San Francisco Board of Supervisors, after a long public hearing on March, 25, 2014, denied the anti-golf activists' appeal of the Rec & Park and Planning Commissions' decisions, and approved the Pump House Project.⁵⁶

Wild Equity, Save the Frogs, and Sequoia Audubon Society then brought a Writ of Mandamus in San Francisco Superior Court, naming the City and County of San Francisco, and its Board of Supervisors, Planning Commission, Planning Department, and Mayor Edwin Lee as defendants, and alleging that their approvals violated the California Environmental Quality Act.⁵⁷ Following trial, San Francisco Superior Court Judge Garrett

⁵¹ Biological Opinion Letter, USFWS, October 2, 2012, supra (fn 43)

⁵² *Wild Equity Institute, Center for Biological Diversity, et al, vs. City and County of San Francisco, supra*, Order Granting Defendants' Motion to Dismiss, etc., Dec. 6, 2012: <https://dl.dropboxusercontent.com/u/30028085/Sharp.Park.Order.Dismissal.12.6.12.pdf>

⁵³ *Wild Equity Institute, Center for Biological Diversity, et al, vs. City and County of San Francisco*, U.S Court of Appeals for the Ninth Circuit, No. 13-1546, Memorandum [Order Dismissing Appeal], March 25, 2015: <http://cdn.ca9.uscourts.gov/datastore/memoranda/2015/03/25/13-15046.pdf>

⁵⁴ Minutes, Planning Commission meeting, January 16, 2014, Item No. 11, Motion No. 19063, adopting findings and affirming decision to issue a Mitigated Negative Declaration for the Sharp Park Pump House Project: http://default.sfplanning.org/meetingarchive/planning_dept/sf-planning.org/index.aspx-page=3770.html [minutes]; http://default.sfplanning.org/meetingarchive/planning_dept/commissions.sfplanning.org/cpcmotions/2014/19063.pdf [Motion]

⁵⁵ Minutes, Recreation and Park Commission meeting, January 23, 2014, Resolution 1401-007 (at pages 11-16): <http://sfrecpark.org/wp-content/uploads/012414-minutes.pdf>

⁵⁶ San Francisco Board of Supervisors, March 25, 2014, Motion No. M14-039: <https://sfgov.legistar.com/View.ashx?M=F&ID=2952903&GUID=29926E90-097F-4F34-BFE1-26579EE3DCBB>

⁵⁷ *Wild Equity Institute, et al. vs. City and County of San Francisco*, San Francisco Sup. Ct, CPF 14-513613, Verified First Amended Petition for Writ of Mandate and Complaint for Declaratory and Injunctive Relief: <https://dl.dropboxusercontent.com/u/30028085/WildEq.v.CCSF%28SFSuper%291Am.Writ%20Petn.4.23.14.pdf>

Wong on August 18, 2015 entered an Order Denying Writ of Mandate⁵⁸, and a Judgment in favor of the defendants.⁵⁹ Among other things, Judge Wong found in his Order Denying Writ of Mandate:

“. . . the Biological Opinion provides an absolute guarantee that the Project will not harm Sharp Park’s red-legged frog population. . . The [US Fish and Wildlife] Service has authorized this Project by issuing the Biological Opinion and the Incidental Take Statement. *Under the Biological Opinion there are no circumstances whereby the Project could possibly “substantially degrade the quality of the environment; substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; [or] substantially reduce the number or restrict the range of an endangered, rare, or threatened species,” which is the measure of a significant adverse impact on a listed species. [citation omitted] The Service has determined that the take levels it authorized in the Incidental Take Statement are “not likely to jeopardize the continued existence of the California red-legged frog or San Francisco garter snake.” [citation omitted] Under the Biological Opinion and the Incidental Take Statement, the Service has already prohibited the Project from causing any level of take that might harm the frog population at Sharp Park. Before the Project could have a detrimental impact on the frog population, it would lose its authorization under the Biological Opinion.”⁶⁰

E. The US Army Corps of Engineers and San Francisco Bay Regional Water Quality Control Board approved the Pump House Project and rejected the anti-golf arguments.

The Pump House Project required – and received – permits and approvals from (1) the Army Corps of Engineers, which granted a Clean Water Act Section 404 permit on February 5, 2014⁶¹; and (2) the San Francisco Bay Regional Water Quality Control Board, which on June 25, 2014 issued a Clean Water Act Section 401 Certification.^{62 63}

⁵⁸ *Wild Equity Institute, et al. vs. City and County of San Francisco*, San Francisco Sup. Ct, CPF 14-513613, Order Denying Writ of Mandate, May 28, 2015: <https://dl.dropboxusercontent.com/u/30028085/SFPGA.SFSup.Ct.Wld.Eq.Dismiss.Jn.1.15.pdf>

⁵⁹ *Wild Equity Institute, et al. vs. City and County of San Francisco*, San Francisco Sup. Ct, CPF 14-513613, Judgment, Aug. 18, 2015: <https://dl.dropboxusercontent.com/u/30028085/Wild.Eq.v.CCSF%2CJudgment.8.18.15.pdf>, Adopting Order Denying Writ of Mandate, May 28, 2015)

⁶⁰ *Wild Equity Institute, et al. vs. City and County of San Francisco*, San Francisco Sup. Ct, CPF 14-513613, Order Denying Writ of Mandate, supra (Note 56), at page 10 line 15 to page 11 line 2: <https://dl.dropboxusercontent.com/u/30028085/SFPGA.SFSup.Ct.Wld.Eq.Dismiss.Jn.1.15.pdf>

⁶¹ Letter, February 5, 2014, U.S. Army Corps of Engineers to San Francisco Recreation and Park Department (“Corps of Engineers letter”), <https://dl.dropboxusercontent.com/u/30028085/SharpPark.Corps.Eng%27rs.Permit.2.5.14.pdf>

⁶² San Francisco Bay RWQCB, CWA Section 401 Certification letter, June 25, 2014, <https://dl.dropboxusercontent.com/u/30028085/RWQCB.Sh.Pk.Certif%27n.6.25.14.pdf>

F. California Coastal Commission finds Sharp Park Golf Course to be a “sensitive coastal resource area” under the Coastal Act because of its recreational – and specifically public golf -- values, and grants a coastal development permit to the Pump House Project, to protect the course from flooding and to “maintain the existing functional capacity of the wetland”.

The California Coastal Commission on April 16, 2015 approved a Coastal Development Permit for the Pump House Project.⁶⁴ ⁶⁵ Significantly, the Commission found that, under the Coastal Act (California Public Resources Code Section 30000, et seq.):

“Sharp Park Golf Course qualifies as **sensitive coastal resource area** due to its significant recreational value and because it is a highly scenic area. (See § 30116(b) and (c)) . . . In particular, Sharp Park Golf Course is open to the public. It is a highly popular course enjoyed by golfers who appreciate its historic architecture, dramatic views, and inexpensive rates.”⁶⁶

Included in the Pump House Project was retroactive approval of new, larger pumps at the pump house. The Commission found that the new pumps are needed to reduce golf course flooding, which would otherwise substantially impact the low-cost public golf “sensitive coastal resource” at Sharp Park.

“In the end, the Commission must determine whether its decision to either deny or approve a project is the decision that is most protective of significant coastal resources. In this case, the Commission finds that the impacts on recreational resources from not constructing the project as conditioned, would be more significant than the project’s potential adverse effects to sensitive EHSA buffer areas and upland habitat. Denying the proposed project because of its inconsistency with Section 30240 would result in the continued flooding of the golf course, which over time may discourage its use and deprive low-income users of the opportunity to play golf with coastal views. In contrast, approving the development as proposed protects and continues recreational uses, and provides some habitat enhancement. . . .

⁶³ Wild Equity Institute on July 25, 2014 filed a Petition for Review and Reconsideration of the Section 401 Certification: http://www.swrcb.ca.gov/public_notices/petitions/water_quality/docs/petitions/a2321petition.pdf ; but according to the California State Water Resources Control Board’s online listing, “Water Quality Petitions” (http://www.swrcb.ca.gov/public_notices/petitions/water_quality/petitions.shtml), as of October 10, 2016 Wild Equity’s Petition (Petition No. A-2321) has not been acted upon by the Water Resources Control Board.

⁶⁴ California Coastal Commission, Permit 2-12-014, June 2, 2015:
<https://dl.dropboxusercontent.com/u/30028085/SFPGA.Sh.Pk.Coast.Comm.CDP.6.2.15.pdf>

⁶⁵ California Coastal Commission, Staff Report, April 3, 2015 and Addendum April 15, 2015:
<http://documents.coastal.ca.gov/reports/2015/4/th8a-4-2015.pdf> . In its April 16, 2015 ruling granting the Permit for the Pump House Project, the Coastal Commission unanimously adopted the Staff Report and its findings. Id., April 3, 2015, at page 5.

⁶⁶ California Coastal Commission, Staff Report, Id. April 3, 2015, at pages 18-19 (emphasis added).

Therefore, the Commission finds that, approving the project, as conditioned, is, on balance, most protective of coastal resources.⁶⁷

On June 15, 2015, Wild Equity Institute (alone) filed suit in San Mateo Superior Court against the Coastal Commission, seeking a writ of administrative mandamus to require the Commission to vacate its permit for the Pump House Project.⁶⁸ On August 20, 2015, San Mateo County Superior Court Judge George Miram denied Wild Equity's motion for preliminary injunction to stay the permit pending outcome of the lawsuit. In so ruling, Judge Miram found that Wild Equity Wild Equity "failed to demonstrate a reasonable probability of prevailing on the merits of its Writ Petition."⁶⁹ Wild Equity then dismissed its lawsuit on October 9, 2015.⁷⁰

San Francisco completed work on the Pump House Project in October, 2015.

G. San Francisco Public Utilities and Rec & Park Commissions

Approve the Pacifica Recycled Water Project, completed in 2012 at a cost of \$10 Million (paid 78% by San Francisco), for the express purpose of providing recycled water to irrigate the golf course.

At a public hearing on October 28, 2008, with no public opposition testimony, the San Francisco Public Utilities Commission voted unanimously to enter an agreement with Pacifica's North Coast County Water District to construct the Pacifica Recycled Water Project, designed to deliver 78% of the project's recycled water from Pacifica's Calera Creek water treatment plant to irrigate the golf course.⁷¹ At the hearing, the only public comment came from Jennifer Clary of the environmentalist group Clean Water Action, who described "a big environmental backlash. . . around red-legged frogs and Sharp Park", but nevertheless urged the Commissioners to support the recycled water project for Sharp Park:

"I urge you to vote yes on this. This is a very difficult project. . . There was a big environmental backlash. . . some of the problems around red-legged frogs

⁶⁷ California Coastal Commission, Staff Report, Id., at pages 35-36

⁶⁸ Complaint for Administrative Mandamus, Filed June 15, 2015, *Wild Equity Institute vs. California Coastal Commission*, San Mateo County Superior Court, No. CIV 534243:
<https://dl.dropboxusercontent.com/u/30028085/WildEq.v.CoastalComm.WritPetitn.6-15-15.pdf>

⁶⁹ Order Denying Motion for Preliminary Injunction, etc., August 20, 2015, *Wild Equity Institute vs. California Coastal Commission*, San Mateo County Superior Court, No. CIV 534243:
<https://dl.dropboxusercontent.com/u/30028085/SFPGA.W.Eq.v.CCC.Order.Deny.Prelim.Injn.8.20.pdf>

⁷⁰ Request for Dismissal (Entered), October 9, 2015, *Wild Equity Institute vs. California Coastal Commission*, San Mateo County Superior Court, No. CIV 534243
<https://dl.dropboxusercontent.com/u/30028085/SFPGAWEqvCCCDissmissal10915.pdf>

⁷¹ Public Utilities Commission, October 28, 2008, Item 11, SFGovTV, at 00:57:16-01:03:31:
http://sanfrancisco.granicus.com/ViewPublisher.php?view_id=22.

and Sharp Park that came up, there was a lot of concern about endangered species. . But I think this is a good project and I urge you to approve it.”⁷²

Initially funded with a planning grant from the State Water Resources Control Board, the \$10 Million project had been in the pipeline since the late 1990’s.⁷³⁷⁴ In November, 2010, the Public Utilities Commission again voted unanimously – this time, over objection from environmentalist groups – to amend the Pacifica Recycled Water agreement, and to enter a Memorandum of Understanding to manage the project with San Francisco’s Rec & Park Department.⁷⁵ In turn, the Rec & Park Commission at its January 20, 2011 public meeting voted unanimously to enter the Memorandum of Understanding with the PUC for the Pacifica Recycled Water Project.⁷⁶ Construction of the pipelines, pumps, and storage tank was completed in 2012, and in October, 2014, recycled irrigation water was delivered to the four golf holes lying east of the Coast Highway.⁷⁷ Today, thanks to the Pacifica Recycled Water Project, Sharp Park is one of the few golf courses between San Francisco and San Jose with a dedicated recycled water irrigation source.

III. There are no legitimate grounds to “sever” Sharp Park from Final EIR.

A. Sharp Park was not “added late” to the Natural Areas planning process or EIR but has been part of the Natural Areas program since its inception.

Evolution of a plan between the initial notice of preparation and the draft EIR stage does not invalidate an EIR process. Nothing in the California Environmental Quality Act, or the CEQA Guidelines, requires that the project description in the initial Notice of Preparation of EIR must remain static throughout the remainder of the CEQA process.

Indeed, consistent with the purpose of requiring agency and public input, projects often change during the course of the CEQA process. See Kostka & Zischke,

⁷² Public Utilities Commission, October 28, 2008, Item 11, Id., SFGovTV, at 01:02:20-01:03:31. Note: Ms. Clary was, as of 2015, also President of San Francisco Tomorrow.

⁷³ Kennedy/Jenks Consultants, “Pacifica Recycled Water Project Facilities Planning Report, December, 2004, at Cover Letter, Dec. 20, 2004 and Pages 1, 23-25. (Copies of cited pages enclosed as **Exhibit 21.**) <http://www.sfwater.org/modules/showdocument.aspx?documentid=2481>

⁷⁴ San Mateo County Times, July 8, 2009, “Pacifica Golf Course, Parks, to Use Recycled Water”: http://www.insidebayarea.com/sanmateocountytimes/localnews/ci_12787178 (Copy attached as **Exhibit 20.**)

⁷⁵ SF Public Utilities Commission Public Hearing, Nov. 9, 2010 (Agenda Items Nos. 11 and 12), SFGovTV video, at 2:51:27- 3:44:04 http://sanfrancisco.granicus.com/GeneratedAgendaViewer.php?view_id=22&clip_id=11078

⁷⁶ SF Recreation and Park Commission Minutes January 20, 2011, pp. 9-11, Agenda Item #9, Resolution No. 1101-009: <http://sfrecpark.org/wp-content/uploads/012011minutes.pdf> [Note: the cover page of the minutes incorrectly states the year as 2010, instead of 2011]

⁷⁷ Pacifica Tribune, Nov. 4, 2014, “Recycled Water Now Used on Sharp Park...”: http://www.mercurynews.com/pacifica/ci_26864797/recycled-water-now-used-sharp-park-golf-course (Copy attached as **Exhibit 19.**)

Practice Under the California Environmental Quality Act (2d ed., March 2012 update)
Section 12.11, citing County of Inyo vs. City of Los Angeles, 71 Cal.App.3d 185, 199 (3rd Dist., 1977) (“The CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project; indeed, new and unforeseen insights may emerge during investigation, evoking revision of the original proposal.”); Western Placer Citizens for an Agricultural and Rural Environment vs. County of Placer, 144 Cal.App.4th 890 (3rd Dist., 2006). The fact that aspects of the SNRAMP, including some aspects of the Sharp Park portion, may have changed between the issuance of the Notice of Preparation and the issuance of the Draft EIR, does not invalidate the process.

Sharp Park Golf Course is recognized by the Planning Department to be Historical Resource Property under the California Environmental Quality Act. So any substantial alteration, such as elimination or redesign of the course to a 9-hole format, would require a separate CEQA review. That is not the case with the A-18 Plan and the Final EIR, which retains the historic course and provides for careful work on any changes to the course to accommodate habitat recovery by a golf architect who specializes in historic golf restoration and the work of Alister MacKenzie. Because the Commission did not adopt the “A-9” or “No Golf” alternatives, a separate golf course-centered Environmental Impact Review process was not required.⁷⁸

B. Anti-golf activists made an effort at the San Francisco Board of Supervisors in 2012 to “sever” Sharp Park from the Natural Areas Program, but that effort died in committee in December, 2012.

On June 26, 2012, then-San Francisco Supervisor Christina Olague submitted a draft Resolution to the Board of Supervisors, captioned “Sever Sharp Park Golf Course from the Natural Areas Plan,” with several “whereas” clauses that closely resemble arguments still being made by anti-golf activists in favor of their current campaign to “sever” Sharp Park from the Natural Areas plan.⁷⁹ The matter was assigned to the Board’s Land Use and Economic Development Committee. But when the bill failed to obtain sufficient support to get out of committee, and at the request of the sponsor, then-Supervisor Olague, the matter was tabled at the Committee’s December 3, 2012 public meeting.⁸⁰

⁷⁸ “Because **redesigning or eliminating** the Sharp Park Golf Course is a separate proposal being studied by SFRPD, it will not be included or evaluated as part of the proposed SNRAMP project analyzed in the EIR. Should changes to the Sharp Park Golf Course be proposed, they would undergo a separate regulatory review, including CEQA environmental review.” (emphasis added) Natural Areas Plan Scoping Report, November, 2009 at page 2-5.

⁷⁹ Draft Resolution, June 26, 2012, File No. 120619, “Sever Sharp Park Golf Course from the Natural Areas Plan”: <https://dl.dropboxusercontent.com/u/30028085/Olague%5BDft%5DResol.6.26.12.pdf>

⁸⁰ Video of Dec. 3, 2012 public meeting of the San Francisco Board of Supervisors Land Use and Government Committee, at 00:00:01 - 00:03:58. San Francisco Government TV: http://sanfrancisco.granicus.com/MediaPlayer.php?view_id=12&clip_id=16465

IV. CONCLUSION: Approve the Final EIR. Don't sever Sharp Park.

Sharp Park Golf Course has been there since 1932—predating Pacifica's incorporation by 25 years—and is the eponym for Pacifica's entire Sharp Park District. It is a beautiful and important property, and a vital historic cultural and recreational resource. Sharp Park is an internationally-significant and extraordinary municipal golf course — one of the very few public courses and the only public seaside links in the world designed by Alister MacKenzie. The golf course is recognized as "Historic Resource Property," protected under the California Environmental Quality Act, and recognized by the California Coastal Commission as "Sensitive Coastal Resource Area" for its scenic, moderately-priced, public golf recreational qualities.

Since the California Coastal Conservancy-sponsored PWA report in 1992, San Francisco's laudable plan to renovate the golf course while recovering habitat for frogs and snakes has been the subject of exhaustive studies, environmental impact reports, public hearings and comment, decisions, orders, and millions of dollars of expenditures, from, among others, the San Francisco PUC and Rec and Park Departments and Board of Supervisors, Pacifica's North Coast County Water District, the US Fish and Wildlife Service, the California Coastal Commission, California Coastal Conservancy, the State Water Resources Control Board, the SF Bay Regional Water Quality Control Board, and the Corps of Engineers.

After all these years, all this study, all these public hearings, and all these decisions by public agencies and courts, it is time to move on with the Natural Areas Program, to certify the Final EIR — importantly, including the 18-hole Sharp Park restoration plan — and adopt the Plan. The 6,500-plus members of the San Francisco Public Golf Alliance urge your Commissions to do so.

Respectfully submitted,

Richard Harris



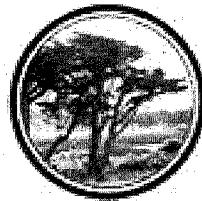
San Francisco Public Golf Alliance
Richard Harris, President
Bo Links, Vice President
Co-Founders

cc: See list, next page

Copies sent to

Edwin Lee, Mayor, City and County of San Francisco
Dennis Herrera, San Francisco City Attorney
Congresswoman Jackie Speier
London Breed, President, San Francisco Board of Supervisors
San Mateo County Board of Supervisors
Pacifica City Council
Pacifica City Manager Lori Tinfow
Philip Ginsburg, General Manager, SF Recreation & Park Dept.
Lisa Wayne, Natural Areas Coordinator, SF Rec & Park Dept.
Dawn Kamalanathan, Planning Director, SF Rec & Park Dept.
John Maltbie, County Manager, County of San Mateo
Joe Huston, Ex. Dir., Northern California Golf Association
Kevin Heaney, Ex. Dir., Southern California Golf Association
Lyn Nelson, Chair, San Francisco Mayor's Women's Golf Council
Jeff Volosing, President, Sharp Park Golf Club
Lisa Villasenor, Captain, Sharp Park Business Women's Golf Club
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Gabriel De La Torre, President, MAGA, San Jose Chapter
John Major, Big SIR, Sons in Retirement
Jim Emery, San Francisco Deputy City Attorney

SAN FRANCISCO PUBLIC GOLF ALLIANCE



235 Montgomery St., Suite 400, San Francisco, CA 94104 • 415-290-5718 • info@sfpublicgolf.org



February 17, 2017

San Francisco Board of Supervisors
City Hall, Room 244
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94103

**Re: Significant Natural Areas Plan Final EIR:
San Francisco Public Golf Alliance supports the Final EIR,
and urges the Board of Supervisors to deny the appeals.
Board of Supervisors File No. 170044
Public Hearing February 28, 2017**

Dear Supervisors,

EXECUTIVE SUMMARY

The non-profit, pro-bono San Francisco Public Golf Alliance and its 6,500-plus members support the Rec & Park Department's Natural Areas Plan ("NAP"), and ask Your Board to deny the appeal from the Planning Commission's December 15, 2016 Order to Certify the Final EIR.

The Sharp Park Restoration component of the NAP strikes reasonable balance between the significant public resources at the Sharp Park Golf Course: the low-cost multi-cultural public recreation; the historical and cultural values of the 85-year-old, Alister Mackenzie-designed golf course; and habitat enhancement for the California red-legged frog and San Francisco Garter Snake.

Sharp Park Golf Course is a unique, popular, and well-known jewel of San Francisco's Rec & Park system. Since 1992, the Department has expended years of effort, expertise, study, and money to maintain the course, while improving habitat for endangered species in the adjoining wetlands. The EIR process alone has now taken six years. The Public Golf Alliance submits that further delay is not warranted or beneficial – either for the creatures or the golf course. It is time to finally approve the NAP and move on.

The Planning Commission's Certification of the Final EIR is consistent with previous decisions at Sharp Park by Your Board and by the lead Federal and State Resource Agencies – US Fish & Wildlife Service, US Army Corps of Engineers, San Francisco Bay Regional Water Quality Control Board, and California Coastal Commission – which since 2012 have considered and heard and rejected the same arguments now being repeated by appellant Wild Equity Institute and the other groups that have joined its appeal (collectively, "WEI").

Four different courts – the U.S. District Court for the Northern District of California, Ninth U.S. Circuit Court of Appeals, San Francisco Superior Court, and San Mateo Superior Court – have since 2012 rejected these appellants' legal challenges at Sharp Park, and have dismissed three different lawsuits against the City and County of San Francisco arising out of the related Sharp Park Pump House Project.

As discussed below, these Resource Agency and Court decisions in the related cases are controlling of key issues in the instant appeal. And the appellants' grounds for appeal are meritless.

The Planning Commission's certification of the Final EIR complies with CEQA, is adequate, accurate and objective, sufficient as an informational document, correct in its conclusions, and reflects the independent judgment and analysis of the City. The Commission's findings are correct, and consistent with the above-described decisions of the Resources Agencies and the Courts.

Accordingly, under San Francisco Administrative Code Section 31.16(c)(4), we call upon Your Board to deny the appeal so that San Francisco can get on with the habitat enhancement work envisioned by the NAP.

II. BACKGROUND: SHARP PARK, "THE POOR MAN'S PEBBLE BEACH," IS A SIGNIFICANT RECREATIONAL AND HISTORICAL RESOURCE. GOLFERS, SAN FRANCISCO AND THE OTHER GOVERNMENTAL ENTITIES, AND LOCAL, NATIONAL AND INTERNATIONAL GOLF AND PRESERVATION ORGANIZATIONS WANT TO PRESERVE IT. APPELLANTS' OBJECTIONS TO THE NAP AT SHARP PARK HAVE BEEN REPEATEDLY REJECTED BY THE LEAD FEDERAL AND STATE RESOURCES AGENCIES AND BY THE COURTS.

Sharp Park Golf Course is a rare and beautiful seaside links, nationally and internationally recognized and loved as one of the few municipal courses designed by Alister MacKenzie, one of the most renowned golf architects in history. The course is highly popular among the diverse public golfers of San Francisco, the Peninsula, and beyond.

The bona fides of the golf course and its architect Alister MacKenzie, and its historic and cultural designations (including recognition by the Washington D.C.-based Cultural Landscape Foundation, Historic Site designation by the City of Pacifica and Pacifica Historical Society, Historic Resource designation under CEQA, and ranking by Golfweek magazine as one of the Top 50 municipal courses in America) are detailed and extensively documented in our December 12, 2016 letter brief to the Planning Commission, a copy of which is attached hereto as Exhibit 1, and incorporated herein by this reference.¹

Our December 12 letter brief to the Planning Commission describes and documents as well a series of rulings in the related Sharp Park Pump House Project case by the US Fish & Wildlife Service, Army Corps of Engineers, San Francisco Bay Regional Water Quality Control Board, and California Coastal Commission, and the decisions of the U.S. District Court for Northern California, U.S. 9th Circuit Court of Appeals, and San Francisco and San Mateo County Superior Courts.² All of these Resource Agency and Court decisions have rejected WEI's attacks on Sharp Park – essentially the same attacks which WEI now brings before the Board of Supervisors on appeal from the Planning Commission's Certification of the Final EIR.

Rather than re-recite our December 12 letter, we refer Your Board to Exhibit 1, attached below.

III. THE APPELLANTS' APPEAL LACKS MERIT.

At the heart of WEI's appeal is its many-years-old grievance that the City and County of San Francisco has rejected WEI's proposed ultimate solution for Sharp Park – to destroy the golf course by flooding it, as outlined in a 2011 “full restoration model” authored by WEI's paid consultant, ESA-PWA. In its January 17, 2017 letter of appeal to Your Board, WIE claims that the Final EIR is deficient for failure to include a full analysis of WEI's alternative Sharp Park plan, to simply allow the flood waters to rise at Sharp Park without pumping.³ But WEI's flood-and-close-the-golf-course plan is inconsistent with the Coastal

¹ A detailed history of Sharp Park's history, awards, distinctions, and state, national, and international support with citation to original source documents, is recited in our December, 12, 2016 letter to the San Francisco Planning and Recreation and Park Commissions, at Pages 3-5, notes 1-29: (<https://dl.dropboxusercontent.com/u/30028085/SFPGA.Ltr.Png%2CRecPk.Comms.12.12.16.pdf>). A copy of that letter is attached hereto as **Exhibit 1**, and incorporated herein by this reference.

² A detailed history of relevant administrative agency proceedings, from 1992 to the present, and Court decisions from 2012-2015, with citation to original source documents, is recited in our December, 12, 2016 letter to the San Francisco Planning and Recreation and Park Commissions, at Pages 6-15, notes 30-80: (<https://dl.dropboxusercontent.com/u/30028085/SFPGA.Ltr.Png%2CRecPk.Comms.12.12.16.pdf>). A copy of that letter is attached hereto as **Exhibit 1**, and incorporated herein by this reference.

³ Wild Equity Letter to Angela Calvillo, Clerk of the Board, January 17, 2017, at page 7: (<https://dl.dropboxusercontent.com/u/30028085/Wild%20Equity%20NAP%20Appeal%20Letter%2C1-17-17.pdf>) : “The FEIR selectively excludes alternatives. . . In particular, (ESA-PWA 2011) contributed a restoration model for Sharp Park . . . [that] constrains pumping so that water levels will rise. . .”

Conservancy's 1992 study,⁴ and has been rejected by the Rec & Park Department's consultant Tetra-Tech (among other reasons, because it was judged considerably more expensive than retaining the course), by the RPD's citizens' advisory committee PROSAC, and by the Rec & Park Commission.⁵

A. The Coastal Commission has already rejected WEI's alternative flood-Sharp-Park plan, because it would harm the golf course, a protected coastal recreational resource.

The NAP's Sharp Park Restoration component is closely related to the earlier Sharp Park Pump House Project, for which San Francisco obtained Federal and State Resources Agency approvals between 2012 and 2015 from the US Fish & Wildlife Service, US Army Corps of Engineers, San Francisco Bay regional Water Quality Control Board, California Coastal Commission, and San Francisco Board of Supervisors. The decisions were then approved by the US District Court for the Northern District of California, US 9th Circuit Court of Appeals, and San Francisco and San Mateo County Superior Courts, which dismissed lawsuits brought by WEI challenging the City's and the agencies' decisions.⁶

WEI has admitted in its October 31, 2011 NAP letter to the Planning Commission that the Sharp Park Pump House Project – which provided for partial dredging of the lagoons at Sharp Park and permitted enlarged replacement pumps for draining flood waters from the golf course – was “**substantially the same plan**” as the Sharp Park Restoration Plan contained in the NAP and now on appeal to Your Board.⁷

When its turn came to review the Pump House Project, the California Coastal Commission in April, 2015 determined (1) that Sharp Park Golf Course is Coastal Resource Property, protected under the California Public Resources Code for its public coastal recreational, scenic, and historic values, and (2) that WEI's proposal to curtail pumping so as to raise the level of flood waters on the golf course violates key public recreation provisions of the Public Resources Code and will be disallowed by the Coastal Commission because it would harm the golf course and its public recreational resource.⁸

⁴ Philip M. Williams Associates, 1992, “Laguna Salada Resource Enhancement Plan: <https://dl.dropboxusercontent.com/u/30028085/SFPGA.PWilliams.Laguna.Salada.Plan.1992f.pdf> , which called for “use which is compatible with the natural resource values of the site and with the golf course operation,” including habitat enhancement, pumping to manage water levels, dredging tulles, maintaining the seawall, continuing the 18-hole golf course, and developing a recycled water irrigation system for the course. *Id.*, at p. 35.

⁵ See Exhibit 1 hereto, San Francisco Public Golf Alliance letter to SF Planning Commission, Dec. 15, 2016, at page 8, notes 40-43.

⁶ See Exhibit 1 hereto, San Francisco Public Golf Alliance letter to SF Planning Commission, Dec. 15, 2016, at page 8, notes 44-70.

⁷ Letter, Wild Equity Institute to SF Planning Dept., Oct. 31, 2011, at 6th unnumbered page, 1st full paragraph: <https://dl.dropboxusercontent.com/u/30028085/Wild.Eq.Ltr.SNRAMP.EIR.11-16.11.pdf>

⁸ California Coastal Commission, Staff Report in re CDP Application Number 2-12-014 (Sharp Park), April 3, 2015: <http://documents.coastal.ca.gov/reports/2015/4/th8a-4-2015.pdf>.

“Sharp Park qualifies as a sensitive coastal resource area due to its significant recreational value and because it is a highly scenic area. (See § 30116(b) and (c).) . . In particular, Sharp Park Golf Course is open to the public. It is a highly popular course enjoyed by golfers who appreciate its historic architecture, dramatic views, and inexpensive rates. . . The golf course offers relatively inexpensive opportunities for the public to enjoy the sport, especially compared to private golf courses in the area.”⁹

The Commission determined that the following California Resources Code Sections apply at Sharp Park: 30210 (maximum access and recreational opportunities for all people), 30213 (lower cost visitor and recreational facilities shall be protected, encouraged), 30221 (oceanfront land suitable for recreational use shall be protected for recreational use), and 30223 (upland areas necessary to support coastal recreational uses shall be reserved for such uses), and 30116(b) and (c).¹⁰ The Commission then found:

“. . . The no project alternative [proposed by WEI] is not feasible as it compromises the recreational resources on site, has not been shown to be the least environmentally damaging alternative with regard to sensitive species, and it fails to be consistent with all relevant Chapter 3 policies. [e.g., Resources Code Sections 30116(b) and (c), 30210, 30213, 30221, 30223] Project opponents [WEI] suggest “conventional” water depth management of the marsh and ponds. This entails raising the amount of water around the lower edges of tulles and cattails from 2 to 4 feet deep to a minimum of 4 feet deep. . . . Allowing this much water to accumulate would impact recreation substantially. . . . Therefore, it is not a feasible alternative and results in recreational resource impacts. Therefore, this is not a feasible alternative.”¹¹

“In the end, . . . the Commission finds that the impacts on recreational resources from not constructing the project as conditioned, would be more significant than the project’s potential adverse effects to sensitive EHSA buffer areas and upland habitat. Denying the proposed project . . . would result in the continued flooding of the golf course, which over time may discourage its use and deprive low-income users of the opportunity to play golf with coastal views. In contrast, approving the development as proposed protects and continues recreational uses, and provides some habitat enhancement. Thus, on balance, the proposed project would result in improvements to recreational resources and may improve habitat for the CRLF [California red-legged frog] and in turn, the SFGS [San Francisco garter snake]. . . . Therefore, the

⁹ California Coastal Commission, Staff Report in re CDP Application Number 2-12-014 (Sharp Park), April 3, 2015, at pp. 18-19 (emphasis added): <http://documents.coastal.ca.gov/reports/2015/4/th8a-4-2015.pdf>. In its April 16, 2015 ruling granting the Permit for the Pump House Project, the Coastal Commission unanimously adopted the Staff Report and its findings. *Id.*, April 3, 2015, at page 5.

¹⁰ *Id.*, at pp. 18-19.

¹¹ *Id.*, at p. 34

Commission finds that, approving the project, as conditioned, is, on balance, most protective of coastal resources.”¹²

The Coastal Commission also expressly considered and rejected the demand from appellant Surfrider Foundation that the Commission impose a “managed retreat” condition on the Sharp Park seawall.¹³

“The Coastal Commission’s review and analysis of land use proposals has been certified by the Secretary of Resources as being the functional equivalent of environmental review under CEQA. The Commission has reviewed the relevant coastal resource issues associated with the proposed project, and has identified appropriate and necessary modifications to address adverse impacts to such coastal resources. The preceding CDP findings in this staff report have discussed the relevant coastal resource issues with the proposal, and the permit conditions identify appropriate mitigations to avoid and/or lessen any potential for adverse impacts to said resources consistent with the requirements of Section 30235 of the Coastal Act.”¹⁴

On June 15, 2015, Wild Equity Institute (alone) filed suit in San Mateo Superior Court against the Coastal Commission and City and County of San Francisco, seeking a writ of administrative mandamus to require the Commission to vacate its permit for the Pump House Project.¹⁵ On August 20, 2015, San Mateo County Superior Court Judge George Miram denied Wild Equity’s motion for preliminary injunction to stay the permit pending outcome of the lawsuit. In so ruling, Judge Miram found that Wild Equity “failed to demonstrate a reasonable probability of prevailing on the merits of its Writ Petition.”¹⁶ Wild Equity then dismissed its lawsuit on October 9, 2015.¹⁷

¹² Id., at p. 36

¹³ Id. Staff Report Addendum, April 15, 2015, “Shoreline Protection,” at page 6,

¹⁴ Id., at p. 37, emphasis added

¹⁵ Complaint for Administrative Mandamus, Filed June 15, 2015, *Wild Equity Institute vs. California Coastal Commission, Respondent, City and County of San Francisco, et al, Real Parties in Interest*, San Mateo County Superior Court, No. CIV 534243:

<https://dl.dropboxusercontent.com/u/30028085/WildEq.v.CoastalComm.WritPetitn.6-15-15.pdf>

¹⁶ Order Denying Motion for Preliminary Injunction, etc., August 20, 2015, *Wild Equity Institute vs. California Coastal Commission*, San Mateo County Superior Court, No. CIV 534243:

<https://dl.dropboxusercontent.com/u/30028085/SFPGA.W.Eq.v.CCC.Order.Deny.Prelim.Injn.8.20.pdf>

¹⁷ Request for Dismissal (Entered), October 9, 2015, *Wild Equity Institute vs. California Coastal Commission*, San Mateo County Superior Court, No. CIV 534243

<https://dl.dropboxusercontent.com/u/30028085/SFPGAWEqvCCCDissmissal10915.pdf>

B. Appellants misrepresent Sharp Park's architecture and history.

At page 3 of its January 17 letter brief, WEI tells Your Board that "... the original design [of the golf course] was washed away by ocean storms decades ago". This is false.

The truth is that most of Alister MacKenzie's original holes – 12 original fairways, tees, and greens, plus two fairways without original greens -- remain at Sharp Park in their original locations. The evidence of this is overwhelming, including comparison of the current course with original hole descriptions, maps, and blueprints, and the expert testimony of eminent golf authorities, including Robert Trent Jones, Jr.^{18,19} Among other things, Jones Jr. says of Sharp Park: "... the key aspect of Sharp Park that makes it a rare gem –it is a "public course designed by a master architect." In addition, it is the only MacKenzie public course that is located next to the ocean, a circumstance that in many respects takes golf back to its roots. . . (Paragraph 14) The golf course Dr. MacKenzie laid out at Sharp Park illustrates many of his noted design concepts. . . (Paragraph 15) I have walked the course at Sharp Park many times and to my eye the features Dr. MacKenzie conceived 80 years ago are still there. . .(Paragraph 16)."²⁰

In its determination that Sharp Park is "significant coastal resource property" under the California Resources Code, the Coastal Commission cited the golf course's "historic architecture".²¹ That is a final ruling. WEI's court challenge to the Coastal Commission's Sharp Pump House Permit was dismissed in October, 2015. The course is designated a Pacifica Historic Site in that city's General Plan, recognized as a Pacifica historical and cultural resource by Pacifica's official historian the Pacifica Historical Society, and as a nationally-significant "At-Risk Cultural Landscape" by the Washington D.C.-based Cultural Landscape Foundation.²²

¹⁸ See Draft Environmental Impact Report, Appendix C, Cultural Resources http://sfmea.sfplanning.org/2005.0912E_DEIR4.pdf : Historic Resources Evaluation Report, January, 2011, by Tetra-Tech and historian Julia Mates (at pages 10-36); DPR [California Department of Parks and Recreation] Form 523, March, 2010, by Julia Mates (at pages 37-56); and Historic Resources Evaluation Response, February 15, 2012, by Tina Tam, Senior Preservation Planner.

¹⁹ Letter (including exhibits) of San Francisco Public Golf Alliance to San Francisco Planning Department, September 20, 2011, Attachment B, Draft EIR Comment Letters (SNRAMP), at pp. B-239 ff: http://sfmea.sfplanning.org/2005.0912E_SNRAMP_VolumeIV_RTC-Attachments_2016-11-16.pdf. See, in particular, the Declaration of Golf Architect Robert Trent Jones, Jr., May 12, 2011, at Id., page B-385 ff.

²⁰ Id. , Jones Declaration, at pages B-390-391.

²¹ California Coastal Commission, Staff Report in re CDP Application Number 2-12-014 (Sharp Park), April 3, 2015, at pp. 18-19: <http://documents.coastal.ca.gov/reports/2015/4/th8a-4-2015.pdf>.

²² Letter, San Francisco Public Golf Alliance to San Francisco Planning Commission, et al., supra, footnote 1. **Exhibit 1**, at pages 3-5, notes 1-29.

C. WEI mischaracterizes the NAP's Sharp Park component as a "radical new golf course redevelopment plan".

The Sharp Park component of the NAP retains the 85-year-old 18-hole golf course, with elimination of one hole (the 3-par 12th Hole) and shortening of two others (9 and 13), for the purpose of enhancing habitat for frogs and snakes. The Public Golf Alliance believes that this can be accomplished in keeping with the courses' history and Alister MacKenzie heritage. This is hardly a "radical new golf course redevelopment plan," as WEI characterizes, it, but rather is what the City has been working towards since the Coastal Conservancy's 1992 Sharp Park study.

D. Sharp Park was not "added late" to the Natural Areas planning process or EIR but has been part of the Natural Areas program since its inception.

Nor was the Department's Sharp Park plan somehow added late, or "replaced" into the NAP in November, 2016, or added in violation of some "promise" to consider Sharp Park separately, as WEI claims in its January 17 letter brief. The plan to keep the golf course, while enhancing habitat for the frogs and snakes has been the City's plan – over WEI's objection – since the Rec & Park Commission approved the plan in 2009.

Evolution of a plan between the initial notice of preparation and the draft EIR stage does not invalidate an EIR process. Nothing in the California Environmental Quality Act, or the CEQA Guidelines, requires that the project description in the initial Notice of Preparation of EIR must remain static throughout the remainder of the CEQA process.

Indeed, consistent with the purpose of requiring agency and public input, projects often change during the course of the CEQA process. See Kostka & Zischke, Practice Under the California Environmental Quality Act (2d ed., March 2012 update) Section 12.11, citing County of Inyo vs. City of Los Angeles, 71 Cal.App.3d 185, 199 (3rd Dist., 1977) ("The CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project; indeed, new and unforeseen insights may emerge during investigation, evoking revision of the original proposal."); Western Placer Citizens for an Agricultural and Rural Environment vs. County of Placer, 144 Cal.App.4th 890 (3rd Dist., 2006). The fact that aspects of the SNRAMP, including some aspects of the Sharp Park portion, may have changed between the issuance of the Notice of Preparation and the issuance of the Draft EIR, does not invalidate the process.

Sharp Park Golf Course is recognized by the Planning Department to be Historical Resource Property under the California Environmental Quality Act. So any substantial alteration, such as elimination or redesign of the course to a 9-hole format, would require a separate CEQA review. That is not the case with the A-18 Plan and the Final EIR, which retains the historic course and provides for careful work on any changes to the course to accommodate habitat recovery by a golf architect who specializes in historic golf restoration and the work of Alister MacKenzie. Because the Commission did not adopt

the “A-9” or “No Golf” alternatives, a separate golf course-centered Environmental Impact Review process was not required.²³

D. Sharp Park cannot and should not at this point be “severed” from the NAP Final EIR.

The San Francisco Administrative Code limits the scope of appeal of this CEQA proceeding “. . .to whether the EIR complies with CEQA, including whether it is adequate, accurate and objective, sufficient as an informational document, correct in its conclusions, and reflects the independent judgment and analysis of the City and whether the Planning Commission certification findings are correct.” On an appeal from a Certification, the Board must either appeal or deny.²⁴

The Board may not partially affirm the Certified Final EIR for the NAP by severing Sharp Park. The Planning Department has explained that “[i]f the Sharp Park component of the SNRAMP project were to be removed, one of the CEQA project objectives would not be achieved (i.e., restoring the Laguna Salada wetland complex), and the other objective would be achieved to a lesser extent (i.e., implementing restoration activities).” Response to Comments at 4-169. Accordingly, removing Sharp Park from the NAP would result in a significant revision of the NAP and the Final EIR, including the removal of the core objective of “restor[ing] the Laguna Salada wetland complex for the benefit of special status species.” Draft EIR at 82.

In other words, Sharp Park cannot simply be “removed” from the Final EIR, because loss of the environmental benefits of the Laguna Salada wetland habitat enhancement, as identified in the FEIR, would require a recalculation of the overall environmental impact of the entire NAP. This would necessitate a restart and recirculation of the entire NAP Environmental Review process.

This “severance” demand was rejected on December 15 by the Planning Commission, and should now also be rejected by Your Board – where a similar effort to “sever” Sharp Park died in committee in 2012.

On June 26, 2012, then-San Francisco Supervisor Christina Olague submitted a draft Resolution to the Board of Supervisors, captioned “Sever Sharp Park Golf Course from the Natural Areas Plan.” The draft Resolution’s “whereas” clauses closely resemble arguments still being made by WEI in support of its current “Sever Sharp Park” campaign.²⁵

²³ “Because **redesigning or eliminating** the Sharp Park Golf Course is a separate proposal being studied by SFRPD, it will not be included or evaluated as part of the proposed SNRAMP project analyzed in the EIR. Should changes to the Sharp Park Golf Course be proposed, they would undergo a separate regulatory review, including CEQA environmental review.” (emphasis added) Natural Areas Plan Scoping Report, November, 2009 at page 2-5.

²⁴ San Francisco Administrative Code, Section 31.16(c)(4).
[http://library.amlegal.com/nxt/gateway.dll/California/administrative/chapter31californiaenvironmentalqualitya?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:sanfrancisco_ca\\$anc=JD_Chapter31](http://library.amlegal.com/nxt/gateway.dll/California/administrative/chapter31californiaenvironmentalqualitya?f=templates$fn=default.htm$3.0$vid=amlegal:sanfrancisco_ca$anc=JD_Chapter31)

²⁵ Draft Resolution, June 26, 2012, File No. 120619, “Sever Sharp Park Golf Course from the Natural Areas Plan”: <https://dl.dropboxusercontent.com/u/30028085/Olague%5BDft%5DResol.6.26.12.pdf>

The matter was assigned to the Board's Land Use and Economic Development Committee. But when the Resolution failed to obtain sufficient support to get out of committee, and the Resolution's sponsor, then-Supervisor Olague, sought to withdraw it, the Resolution was tabled at the Committee's December 3, 2012 public meeting.²⁶

IV. CONCLUSION: Deny the Appeal. Don't sever Sharp Park.

Sharp Park Golf Course has been there since 1932—predating Pacifica's incorporation by 25 years—and is the eponym for Pacifica's entire Sharp Park District. It is a beautiful and important property, and a vital historic cultural and recreational resource. Sharp Park is an internationally-significant and extraordinary municipal golf course – one of the very few public courses and the only public seaside links in the world designed by Alister MacKenzie. The golf course is recognized as "Historic Resource Property," protected under the California Environmental Quality Act, and recognized by the California Coastal Commission as "Sensitive Coastal Resource Area" for its scenic, moderately-priced, public golf recreational qualities.

Since the California Coastal Conservancy-sponsored PWA report in 1992, San Francisco's laudable plan to renovate the golf course while recovering habitat for frogs and snakes has been the subject of exhaustive studies, environmental impact reports, public hearings and comment, decisions, orders, and millions of dollars of expenditures, from, among others, the San Francisco PUC and Rec and Park Departments and Board of Supervisors, Pacifica's North Coast County Water District, the US Fish and Wildlife Service, the California Coastal Commission, California Coastal Conservancy, the State Water Resources Control Board, the SF Bay Regional Water Quality Control Board, and the Corps of Engineers.

After all these years, all this study, all these public hearings, and all these decisions by public agencies and courts, it is time to move on with the Natural Areas Program, importantly, including the 18-hole Sharp Park restoration plan. The Planning Commission has certified the Final EIR to do this, and the 6,500-plus members of the San Francisco Public Golf Alliance urge your Board to uphold that decision.

Respectfully submitted,

Richard Harris



San Francisco Public Golf Alliance
Richard Harris, President
Bo Links, Vice President
Co-Founders

cc: See list, next page

²⁶ Video of Dec. 3, 2012 public meeting of Land Use and Government Committee, at 00:00:01 - 00:03:58.
SGovTV: http://sanfrancisco.granicus.com/MediaPlayer.php?view_id=12&clip_id=16465

cc:

Edwin Lee, Mayor, City and County of San Francisco
Dennis Herrera, San Francisco City Attorney
Philip Ginsburg, General Manager, SF Recreation & Park Dept.
John Rahim, Planning Director

Exhibit 1

See attached Letter, December 12, 2016
From San Francisco Public Golf Alliance to
San Francisco Planning and Recreation and Park Commissions

Carroll, John (BOS)

From: Erica Stanojevic <ericast@gmail.com>
Sent: Sunday, February 26, 2017 5:03 PM
To: Fewer, Sandra (BOS); Farrell, Mark (BOS); Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Johnston, Conor (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Cohen, Malia (BOS); Safai, Ahsha (BOS); Jalipa, Brent (BOS); Board of Supervisors, (BOS)
Subject: Please protect wetlands and reject any SNRAMP that includes golf course redevelopment
Categories: 170044

Dear San Francisco Board of Supervisors:

I am writing to urge you to reject the Final Environmental Impact Report (FEIR) for the proposed Significant Natural Resource Areas Management Plan (SNRAMP), unless and until the Sharp Park Golf Course redevelopment is removed from the plan. The vast majority of California's wetlands have been drained, degraded and destroyed. Sharp Park is home to federally protected, endangered California Red-Legged Frogs (*Rana draytonii*), California's official state amphibian. The Board of Supervisors should work to protect, rather than to kill, harm and harass these frogs, which is what happens when the City pumps the Sharp Park Wetlands out to sea, causing the frogs' egg masses to be stranded on dry land. I wholeheartedly oppose any usage of taxpayer funds that results in the destruction of rare wetland ecosystems or the degradation of important wildlife habitat. Using taxpayer dollars to drain wetlands for non-essential purposes is thoroughly unethical. As such, I again request that you not approve any version of a Significant Natural Resource Areas Management Plan that condones or funds such activities. Please see www.savethefrogs.com/sharp-park for more info, and remember that there are over 1,000 other golf courses in California.

Blessings,
Erica Stanojevic

Carroll, John (BOS)

From: Dianne Ensign <Roughskinnednewt@hotmail.com>
Sent: Friday, February 24, 2017 1:55 PM
To: Board of Supervisors, (BOS); Fewer, Sandra (BOS); Farrell, Mark (BOS); Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Johnston, Conor (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Cohen, Malia (BOS); Safai, Ahsha (BOS); Jalipa, Brent (BOS)
Subject: Please protect wetlands and reject any SNRAMP that includes golf course redevelopment
Categories: 170044

Dear San Francisco Board of Supervisors:

Protecting the environment is my highest priority, and I strongly urge you to reject the Final Environmental Impact Report (FEIR) for the proposed Significant Natural Resource Areas Management Plan (SNRAMP), unless and until the Sharp Park Golf Course redevelopment is removed from the plan.

The vast majority of California's wetlands have been drained, degraded and destroyed. Sharp Park is home to federally protected, endangered California Red-Legged Frogs (*Rana draytonii*), California's official state amphibian. The Board of Supervisors should work to protect, rather than to kill, harm and harass these frogs, which is what happens when the City pumps the Sharp Park Wetlands out to sea, causing the frogs' egg masses to be stranded on dry land.

Amphibians already face an alarming array of threats, and frogs, an integral part of the food web, are disappearing. I wholeheartedly oppose any usage of taxpayer funds that results in the destruction of rare wetland ecosystems or the degradation of important wildlife habitat. Using taxpayer dollars to drain wetlands for non-essential purposes is thoroughly unethical. As such, I again request that you not approve any version of a Significant Natural Resource Areas Management Plan that condones or funds such activities. Please see www.savethefrogs.com/sharp-park for more info, and remember that there are over 1,000 other golf courses in California.

Thank you for considering my comments.

Dianne Ensign
11600 SW Lancaster Rd.
Portland, OR 97219

Save The Sharp Park Wetlands!

www.savethefrogs.com

The City of San Francisco is killing endangered frogs at its Sharp Park Golf Course. Our vision is a new Sharp Park: open to the public, safe for wildlife. Learn more about Sharp Park here.

Carroll, John (BOS)

From: Séverine <sevinaa@gmail.com>
Sent: Friday, February 24, 2017 4:13 AM
To: Board of Supervisors, (BOS); Fewer, Sandra (BOS); Farrell, Mark (BOS); Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Johnston, Conor (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Cohen, Malia (BOS); Safai, Ahsha (BOS); Jalipa, Brent (BOS)
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The Board of Supervisors should work to protect, rather than to kill, harm and harass these frogs, which is what happens when the City pumps the Sharp Park Wetlands out to sea, causing the frogs' egg masses to be stranded on dry land. I wholeheartedly oppose any usage of taxpayer funds that results in the destruction of rare wetland ecosystems or the degradation of important wildlife habitat. Using taxpayer dollars to drain wetlands for non-essential purposes is thoroughly unethical.

As such, I again request that you not approve any version of a Significant Natural Resource Areas Management Plan that condones or funds such activities.

Please see www.savethefrogs.com/sharp-park for more info, and remember that there are over 1,000 other golf courses in California.

Séverine Chance

Carroll, John (BOS)

From: Phoebe Anne Sorgen <phoebeso@earthlink.net>
Sent: Thursday, February 23, 2017 11:14 PM
To: Board of Supervisors, (BOS); Fewer, Sandra (BOS); Farrell, Mark (BOS); Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Johnston, Conor (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Cohen, Malia (BOS); Safai, Ahsha (BOS); Jalipa, Brent (BOS)
Subject: How dare you kill endangered legged frogs, our state's official amphibian!
Categories: 170044

Dear San Francisco Board of Supervisors:

Though I'm American, I lived in France with those "frogs" for 6 years, then came to SF in 1989. I love California, and I love our state's frogs and other fauna and flora.

Sharp Park could be one of SF's treasures as it is home to federally protected, endangered California Red-Legged Frogs (*Rana draytonii*), California's official state amphibian. You need to work to protect, rather than to kill, harm and harass these frogs, which is what happens when the City pumps the Sharp Park Wetlands out to sea, causing the frogs' egg masses to be stranded on dry land.

I urge you to reject the Final Environmental Impact Report (FEIR) for the proposed Significant Natural Resource Areas Management Plan (SNRAMP), unless and until the Sharp Park Golf Course redevelopment is removed from the plan. The vast majority of California's wetlands have been drained, degraded and destroyed.

I wholeheartedly oppose any usage of taxpayer funds that results in the destruction of rare wetland ecosystems or the degradation of important wildlife habitat. Is that even legal?? In any case, using taxpayer dollars to drain wetlands for non-essential purposes is thoroughly unethical. So do not approve any version of a Significant Natural Resource Areas Management Plan that condones or funds such activities. Please see www.savethefrogs.com/sharp-park for more info, and remember that there are over 1,000 other golf courses in California. That's plenty! They take too much energy and water to maintain in this era of climate change/chaos.

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Tuesday, February 28, 2017 11:43 AM
To: Fewer, Sandra (BOS); Peskin, Aaron (BOS); Tang, Katy (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Board of Supervisors, (BOS)
Subject: Rescind Certification of EIR for SNRAMP: it is a "whitewash"
Categories: 170044

Attention SF Board of Supervisors: The EIR for the SNRAMP is a "whitewash" From wikipedia: To whitewash is a metaphor meaning "to gloss over or cover up vices, crimes or scandals or to exonerate by means of a perfunctory investigation or through biased presentation of data"

Fact 1: You cannot cut down 18,500 trees and "replace" them with grass and shrubs without a huge release of greenhouse gas and a loss of future carbon sequestration.

Fact 2: You cannot close 28% of our City's parkland to public access and claim there is no impact on our recreation.

Fact 3: You cannot say implementing a plan that is totally dependent on herbicides will not increase herbicide spraying in our parks.

Fact 4: You cannot ban bicycles from 1/3 of our park areas and say there is no impact on bicyclists.

Fact 5: Yet this is what the EIR claims.

Conclusion: Reject the certification of the EIR and send it back to Planning for an honest evaluation of the impacts of the SNRAMP. While that is happening, halt RPD's premature implementation of the Plan.

Signed: KC Murphy

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Monday, February 27, 2017 6:30 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
Subject: EIR DOES NOT identify the impacts of SNRAMP implementation, mitigation needed
Categories: 170044

Attention SF Board of Supervisors:	There are procedural violations of CEQA and SF Admin code involved in bringing the EIR from DEIR to FEIR. There is a question whether the EIR properly identifies the impacts of SNRAMP implementation. Here are 10 issues I am concerned about:
1. Public access restrictions:	Public access will be confined to on-trail only, or less than 5% of the access we currently enjoy. The EIR does not identify this impact.
2. Increase in greenhouse gases:	You do not have to be a scientist to realize that cutting down 18,448 trees and replacing them with grass and shrubs will have the opposite effect. The EIR calculations are wrong.
3. Increase in herbicides:	The SNRAMP is dependent on the use of herbicides to kill the roots of felled trees and unwanted plants. The EIR claims the Plan will not require additional herbicide use.
4. CEQA process violations:	The process utilized by Planning violated CEQA, thereby preventing proper vetting of the EIR.
5. Trail closures:	The SNRAMP plans closure of 26% of our trails. Actually, the NAP has closed more than 50% of the trails in parks where they have executed "trail improvement" projects. This is a significant impact on public recreation the EIR fails to address.
6. No required tree replacement in Project area:	The EIR analysis of impacts on air quality, greenhouse gas emissions, aesthetics, wind and hydrology hinge on a false premise, that every tree removed in the Project area would be replaced with a new tree somewhere in the Project area.
7. Project implementation before EIR violates CEQA:	The EIR claims the SNRAMP is not being implemented ahead of the EIR certification. Yet, we have already had our trails closed and fences strewn across our parks.
8. Bicyclists singled out:	The EIR claims, "The SNRAMP does not single out bicyclists as a concern and does not include actions directed specifically at bicycle use." Signage installed by RPD in 2015 proves this to be false.
9. Impact of fencing ignored:	The NAP's implementation of the SNRAMP in advance of the EIR demonstrates that their use of fences will be much more extensive than what is disclosed in the SNRAMP.
10. Evidence of bias:	Bias in the EIR is demonstrated by the inclusion of "alternate facts", such as the explanation for the bench removal at Mt. Davidson and the Glen Canyon Miraloma trail closure.

Signed:
Anastasia Glikshtern
150 Chaves Ave.
SF, CA 94127

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Monday, February 27, 2017 4:03 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
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10. Evidence of bias:	Bias in the EIR is demonstrated by the inclusion of "alternate facts", such as the explanation for the bench removal at Mt. Davidson and the Glen Canyon Miraloma trail closure.

Signed: Robert Finley
3826 Ulloa Street
San Francisco, CA 94116

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Monday, February 27, 2017 2:42 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
Subject: EIR DOES NOT identify the impacts of SNRAMP implementation, mitigation needed
Categories: 170044

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Signed: steve snyder - 445 darien way, san francisco

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Monday, February 27, 2017 12:30 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
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Signed:

Luise Custer
65 Sequoia Way
San Francisco, CA 94127
(We live on Mt. Davidson and look out on its cluster of trees every day. This means a great deal to us.)

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Monday, February 27, 2017 11:57 AM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
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Signed: Juliet Whitcomb
2741 Divisadero St
San Francisco, CA 94123

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Monday, February 27, 2017 11:43 AM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
Subject: EIR DOES NOT identify the impacts of SNRAMP implementation, mitigation needed
Categories: 170044

Attention SF Board of Supervisors:	There are procedural violations of CEQA and SF Admin code involved in bringing the EIR from DEIR to FEIR. There is a question whether the EIR properly identifies the impacts of SNRAMP implementation. Here are 10 issues I am concerned about:
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10. Evidence of bias:	Bias in the EIR is demonstrated by the inclusion of "alternate facts", such as the explanation for the bench removal at Mt. Davidson and the Glen Canyon Miraloma trail closure.

Signed:

Ramona Birchler
350 Molimo Drive
San Francisco, Ca 94127

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Monday, February 27, 2017 11:10 AM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
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Signed:

Mt. Davidson has grown into a natural habitat for both animal and plant life unlike any other in San Francisco. Whether it has come about as a result of human intervention or not, at this point, is irrelevant. The mountain MAY or MAY NOT have evolved into this state it is now anyway. To strip an incredibly unique mountain in the middle of one of the most diverse Cities in the country is a crime. There is no other place like it. Unless you have personally shared its wonders with your children and their friends, then you have no insight into its amazing gifts. Just look at Twin Peaks for one minute and see the barren landscape with the erosion, wind and complete exposure to the elements and you will get a small idea of what the canopy of tress has provided Mt. Davidson. Try to image Easter Sunday at the cross as 30 MPH winds crest the top of that sacred spot instead of the effused light of the morning filtering through the trees providing protection and beauty. Do not destroy this incredibly precious and amazing mountain under the guise set forth. It MAY have happened anyway; trees spread, trees grow, it's what they do. For the reasons above, I strongly advocate for the restoration of trees already cut and the abandonment of any further deforestation of Mt. Davidson. Closing trails, cutting trees and endangering our children is not what this mountain should be remembered for. Our future children and visitors should all have the opportunity to experience this one-of-a-kind mountain. Please take a moment to visit the park on any weekend and talk with the tourists and locals who come happily down the mountain trail with photos and memories of a place only San Francisco can offer.

Keith LaCabe
San Francisco Resident
Molimo Drive

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Monday, February 27, 2017 10:34 AM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
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Signed: Carole Issel, 654 Los Palmos Drive, San Francisco

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Monday, February 27, 2017 9:00 AM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
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2. Increase in greenhouse gases:	You do not have to be a scientist to realize that cutting down 18,448 trees and replacing them with grass and shrubs will have the opposite effect. The EIR calculations are wrong. Mature trees sequester great amounts of greenhouse gasses. Native bushes and plants do not. Are NAP and SFRecPark climate change deniers? It seems so.
3. Increase in herbicides:	The SNRAMP is dependent on the use of herbicides to kill the roots of felled trees and unwanted plants. The EIR claims the Plan will not require additional herbicide use. We already know that NAP areas cannot thrive without constant use of herbicides. AND the removal of trees can have unintended consequences, which we have seen already during this heavy rainy season, and that is soil erosion and destabilization of soil.
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7. Project implementation before EIR violates CEQA:	The EIR claims the SNRAMP is not being implemented ahead of the EIR certification. Yet, we have already had our trails closed and fences strewn across our parks. We have watched the forest becoming thinner and thinner, whole sections of trees removed. On Dalewood, many more trees than those marked for removal have been removed during February.
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Signed: Linda Garcia Milhoan
324 Molimo Drive
District 7
Miraloma Park homeowner and resident since 1979; SF resident since 1972

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Sunday, February 26, 2017 10:03 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
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Signed: Deborah Zwerner
19 Hazelwood Ave
San Francisco 94112

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Sunday, February 26, 2017 9:57 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
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Signed: Natalie dewitt
762 faxon avenue
San francisco ca 94112

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Sunday, February 26, 2017 7:58 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
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Stuart A Rosenthal
304 Gennessee St.
San Francisco, CA 94112

Signed:

30 year resident, former President Sunnyside Neighborhood Association
I object to the blatant use of toxic herbicides to address the "return to native" areas on
Mt. Davidson. I object to the removal of existing trees which have created a habitat for
city species of animals and birds and humans alike.

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Sunday, February 26, 2017 6:39 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
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Signed: Michelle Weston
545 Melrose Avenue
San Francisco, CA 94127

Carroll, John (BOS)

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Sent: Sunday, February 26, 2017 5:20 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
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Signed:

John Vanderslice
284 Los Palmos Dr
SF CA 94127
415-819-1960

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Sunday, February 26, 2017 5:17 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
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Signed: Vivian Turner
101 Casitas
San Francisco 94127

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Sunday, February 26, 2017 4:21 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
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10. Evidence of bias:	Bias in the EIR is demonstrated by the inclusion of "alternate facts", such as the explanation for the bench removal at Mt. Davidson and the Glen Canyon Miraloma trail closure.

Signed: Gina Luzzi
545 Melrose Ave
San Francisco 94127

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Sunday, February 26, 2017 2:48 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
Subject: EIR DOES NOT identify the impacts of SNRAMP implementation, mitigation needed
Categories: 170044

Attention SF Board of Supervisors:	There are procedural violations of CEQA and SF Admin code involved in bringing the EIR from DEIR to FEIR. There is a question whether the EIR properly identifies the impacts of SNRAMP implementation. Here are 10 issues I am concerned about:
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Signed: Kirsten Poon
178 Los Palmos Drive
San Francisco, CA 94127

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Sunday, February 26, 2017 2:20 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
Subject: EIR DOES NOT identify the impacts of SNRAMP implementation, mitigation needed
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Signed:
Steven Kacsmar
21 Homewood Ct.
San Francisco, CA 94112

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Sunday, February 26, 2017 8:04 AM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
Subject: EIR DOES NOT identify the impacts of SNRAMP implementation, mitigation needed
Categories: 170044

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Signed: Tad Sky. 215 Hearst ave. Sunnyside. SF 94131

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Saturday, February 25, 2017 11:55 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
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Signed: Lara Burns
131 Staples Ave
94112

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Saturday, February 25, 2017 9:53 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
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Signed: Brett Spitnale

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Saturday, February 25, 2017 8:48 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
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Signed:

Denise Kwan
45 Teresita Blvd.

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Saturday, February 25, 2017 8:43 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
Subject: EIR DOES NOT identify the impacts of SNRAMP implementation, mitigation needed
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Signed:
Betty hue
64 Verna
94127

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Saturday, February 25, 2017 7:39 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
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Signed: Michele Quiroga on Rockdale Dr. In Miraloma Park

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Saturday, February 25, 2017 7:17 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
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3. Increase in herbicides:	The SNRAMP is dependent on the use of herbicides to kill the roots of felled trees and unwanted plants. The EIR claims the Plan will not require additional herbicide use. My house is below Mt. Davidson and I am concerned with runoff due to erosion via removal of trees, which can carry the herbicides directly into my back yard.
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Signed:

Key Kang, Myra Way, San Francisco CA 94127

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Saturday, February 25, 2017 7:14 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
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Signed: Mary peters
475 Molimo
Sf 94127

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Saturday, February 25, 2017 7:10 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
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Signed: Bronagh Hanley

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Saturday, February 25, 2017 5:46 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
Subject: EIR DOES NOT identify the impacts of SNRAMP implementation, mitigation needed
Categories: 170044

Attention SF Board of Supervisors:	There are procedural violations of CEQA and SF Admin code involved in bringing the EIR from DEIR to FEIR. There is a question whether the EIR properly identifies the impacts of SNRAMP implementation. Here are 10 issues I am concerned about:
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Signed: Mark Pigram
439 Myra Way
San Francisco, CA 94127

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Saturday, February 25, 2017 5:45 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
Subject: EIR DOES NOT identify the impacts of SNRAMP implementation, mitigation needed
Categories: 170044

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Signed:

Timothy Armour
439 Myra Way
San Francisco, CA 9*4127

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Saturday, February 25, 2017 5:08 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
Subject: EIR DOES NOT identify the impacts of SNRAMP implementation, mitigation needed
Categories: 170044

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With so many other issues facing this city that deserve attention and tax payer funds, cutting down trees on Mt Davidson is an absolute waste of resources. I can think of few things more frivolous than this initiative.

Signed:

Jim Deeken
71 Gaviota Way
SF CA 94127

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Saturday, February 25, 2017 4:55 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
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Signed:

Tonia Weakland 311 Gennessee Street San Francisco CA 94112
415-963-1581

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Saturday, February 25, 2017 4:41 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
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Signed: Monica Collins 378 Hearst Av 94112

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Saturday, February 25, 2017 4:36 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
Subject: EIR DOES NOT identify the impacts of SNRAMP implementation, mitigation needed
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Signed: Jack Pantaleo
471 Teresita Blvd.
Sean Francisco, Be. 94127

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Saturday, February 25, 2017 4:25 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
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Signed:

Judith Dauphinais, resident Miraloma Park, 499 Teresita Boulevard, San Francisco,
94127

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Saturday, February 25, 2017 3:48 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
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Signed:
kATHLEEN KRAUS
300 MARIETTA DR
SF CA 94127

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Saturday, February 25, 2017 3:44 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
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Signed: Dana Olsborg 28 Sequoia Way SF 94127

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Saturday, February 25, 2017 3:42 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
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Signed: Michael Coleman
40 Evelyn Way
San Francisco

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Saturday, February 25, 2017 3:41 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
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Signed:

AM Etcheverria
40 Evelyn way, SF

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Saturday, February 25, 2017 3:11 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
Subject: EIR DOES NOT identify the impacts of SNRAMP implementation, mitigation needed
Categories: 170044

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Signed:
Bruce Douglas
655 Myra Way
San Francisco, CA 94127

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Saturday, February 25, 2017 3:09 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
Subject: EIR DOES NOT identify the impacts of SNRAMP implementation, mitigation needed
Categories: 170044

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Signed:
Stephen Hall
23 El Sereno Ct.
San Francisco 94127 (in Miraloma Park)

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Saturday, February 25, 2017 3:05 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
Subject: EIR DOES NOT identify the impacts of SNRAMP implementation, mitigation needed
Categories: 170044

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Signed: Bernadette Monbureau

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Saturday, February 25, 2017 3:01 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
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Signed:

Adam lee

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Saturday, February 25, 2017 1:22 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
Subject: EIR DOES NOT identify the impacts of SNRAMP implementation, mitigation needed
Categories: 170044

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Signed:

Dirk J. Beijen
San Francisco 94131

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Saturday, February 25, 2017 11:27 AM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
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Signed: Nancy Rossman, 218 Bradford St. SF 94110 Hillary Ronen's District

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Saturday, February 25, 2017 11:16 AM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
Subject: EIR DOES NOT identify the impacts of SNRAMP implementation, mitigation needed
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Judy Reynolds
660 Victoria
San Francisco, CA 94127

Signed:

Please be a leader and stop this mistaken plan to turn San Francisco public spaces back into sandy weeds instead of family friendly park lands.

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Saturday, February 25, 2017 10:16 AM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
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Signed:

Elizabeth J Steblay
221 Stillings Avenue
San Francisco, CA 94131

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Friday, February 24, 2017 12:47 PM
To: Fewer, Sandra (BOS); Peskin, Aaron (BOS); Tang, Katy (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Board of Supervisors, (BOS)
Subject: Rescind Certification of EIR for SNRAMP: it is a "whitewash"
Categories: 170044

Attention SF Board of Supervisors: The EIR for the SNRAMP is a "whitewash" From wikipedia: To whitewash is a metaphor meaning "to gloss over or cover up vices, crimes or scandals or to exonerate by means of a perfunctory investigation or through biased presentation of data"

Fact 1: You cannot cut down 18,500 trees and "replace" them with grass and shrubs without a huge release of greenhouse gas and a loss of future carbon sequestration.

Fact 2: You cannot close 28% of our City's parkland to public access and claim there is no impact on our recreation.

Fact 3: You cannot say implementing a plan that is totally dependent on herbicides will not increase herbicide spraying in our parks.

Fact 4: You cannot ban bicycles from 1/3 of our park areas and say there is no impact on bicyclists.

Fact 5: Yet this is what the EIR claims.

Conclusion: Reject the certification of the EIR and send it back to Planning for an honest evaluation of the impacts of the SNRAMP. While that is happening, halt RPD's premature implementation of the Plan.

Signed: It is totally out of line with the majority of the civilized world and SICK to continue mass herbicide use and destruction of living trees! Everywhere else I read is encouraging the planing of trees and whole forests for environmental benefit. Dogs and children are & will have to continue running through this POISON, how COULD YOU? If you have to remove something such as ugly underbrush, how about HIRING THE JOBLESS/UNDEREMPLOYED to do this? I've been doing everything by hand in my yard. It works a lot better than poisoning the neighborhood! I have lived right by Glen Park for over 30 years and I/children/dogs am afraid to go there and have to breath & be exposed to deadly POISON! This sounds so CORRUPT: t's probably no more money to hire persons to remove what you think has to be removed by HAND than to pay the usual overpaid contractors and fork out our tax dollars to Monsanto!
Signed: Susan Shalit, 718 Duncan St., San Francisco, CA 94131

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Friday, February 24, 2017 12:44 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
Subject: EIR DOES NOT identify the impacts of SNRAMP implementation, mitigation needed
Categories: 170044

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3. Increase in herbicides:	The SNRAMP is dependent on the use of herbicides to kill the roots of felled trees and unwanted plants. The EIR claims the Plan will not require additional herbicide use. I am completely opposed to ALL use of herbicides.
4. CEQA process violations:	The process utilized by Planning violated CEQA, thereby preventing proper vetting of the EIR.
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Signed:

Lydia Cassorla
1801 14th Ave

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Friday, February 24, 2017 3:58 AM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
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10. Evidence of bias:	Bias in the EIR is demonstrated by the inclusion of "alternate facts", such as the explanation for the bench removal at Mt. Davidson and the Glen Canyon Miraloma trail closure.

Signed:

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Thursday, February 23, 2017 8:35 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
Subject: EIR DOES NOT identify the impacts of SNRAMP implementation, mitigation needed
Categories: 170044

Attention SF Board of Supervisors:	There are procedural violations of CEQA and SF Admin code involved in bringing the EIR from DEIR to FEIR. There is a question whether the EIR properly identifies the impacts of SNRAMP implementation. Here are 10 issues I am concerned about:
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Signed:
Robert Sutton
Miraloma Park
SF, CA 94127

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Thursday, February 23, 2017 5:48 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
Subject: EIR DOES NOT identify the impacts of SNRAMP implementation, mitigation needed
Categories: 170044

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Signed: Carol Drobek
1260 Broadway #106
SF 94109

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Thursday, February 23, 2017 5:47 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
Subject: EIR DOES NOT identify the impacts of SNRAMP implementation, mitigation needed
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Signed:

Margarida MacCormick and Alan Merritt
716 Ulloa St
San Francisco, CA 94127

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Thursday, February 23, 2017 5:37 PM
To: Fewer, Sandra (BOS); Peskin, Aaron (BOS); Tang, Katy (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Board of Supervisors, (BOS)
Subject: Rescind Certification of EIR for SNRAMP: it is a "whitewash"
Categories: 170044

Attention SF Board of Supervisors: The EIR for the SNRAMP is a "whitewash" From wikipedia: To whitewash is a metaphor meaning "to gloss over or cover up vices, crimes or scandals or to exonerate by means of a perfunctory investigation or through biased presentation of data"

Fact 1: You cannot cut down 18,500 trees and "replace" them with grass and shrubs without a huge release of greenhouse gas and a loss of future carbon sequestration.

Fact 2: You cannot close 28% of our City's parkland to public access and claim there is no impact on our recreation.

Fact 3: You cannot say implementing a plan that is totally dependent on herbicides will not increase herbicide spraying in our parks.

Fact 4: You cannot ban bicycles from 1/3 of our park areas and say there is no impact on bicyclists.

Fact 5: Yet this is what the EIR claims.

Conclusion: Reject the certification of the EIR and send it back to Planning for an honest evaluation of the impacts of the SNRAMP. While that is happening, halt RPD's premature implementation of the Plan.

We have sufficient cement in SF, we need to keep our open, natural spaces with all that entails. 18,500 trees! Are you freaking kidding me?! Please reject this.

Signed:

L. Zephyr
1215 Castro #6
SF

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Thursday, February 23, 2017 5:34 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
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Signed:

Jesse Shrieve
94131 - District 7 in San Francisco

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Thursday, February 23, 2017 1:06 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
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Clearly the EIR (Case # 2005.0912E/ SNRAMP) in its current form is inadequate, inaccurate and not objective, and should not be certified. Thank you for your careful consideration.

Signed:

S Wheeler
San Francisco, CA
swheeler4hs@hotmail.com

Carroll, John (BOS)

From: burst@emailmeform.com on behalf of EmailMeForm <burst@emailmeform.com>
Sent: Thursday, February 23, 2017 12:07 PM
To: Peskin, Aaron (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Sheehy, Jeff (BOS); Ronen, Hillary; Carroll, John (BOS); Farrell, Mark (BOS); Cohen, Malia (BOS)
Subject: EIR DOES NOT identify the impacts of SNRAMP implementation, mitigation needed
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Signed: Michel Balea
1801 14th avenue, SF, 94122
district 7

Jalipa, Brent (BOS)

From: Hue, Melinda (CPC)
Sent: Monday, February 27, 2017 2:05 PM
To: bplater@wildequity.org; desai@npca.org; ggas@goldengateaudubon.org; office@sequoia-audubon.org; kerry@savethefrogs.com; deesel91@gmail.com; SFForestNews@gmail.com; tom@intrinsicdevices.com; bo@slotelaw.com; richard@sfpubicgolf.org; Julia4th@yahoo.com; Bradley, Stacy (REC)
Cc: Givner, Jon (CAT); Stacy, Kate (CAT); Byrne, Marlena (CAT); Rahaim, John (CPC); Sanchez, Scott (CPC); Gibson, Lisa (CPC); Starr, Aaron (CPC); Rodgers, AnMarie (CPC); Hue, Melinda (CPC); Ionin, Jonas (CPC); BOS-Supervisors; BOS-Legislative Aides; Calvillo, Angela (BOS); Somera, Alisa (BOS); Lew, Lisa (BOS); Carroll, John (BOS); BOS Legislation, (BOS); Range, Jessica (CPC); Kapla, Robb (CAT)
Subject: APPEAL RESPONSE - SUPPLEMENTAL MATERIAL: Appeal of CEQA Certification of Final Environmental Impact Report - Significant Natural Resource Areas Management Project - Appeal Hearing on February 28, 2017
Attachments: NRMP Supplemental Appeal Response_022717.pdf
Categories: 170044

Good afternoon,

Please find attached to this email the Planning Department's supplemental appeal response, concerning the CEQA Certification of Final Environmental Impact Report Appeal for the proposed Significant Natural Resource Areas Management Project (SNRAMP). (Board of Supervisors File No. 170044.)

The Planning Department's supplemental appeal response is provided to address to the supplemental materials to the SF Forest Alliance letter that was submitted to the Board Secretary on February 16, 2017 and the supplemental materials to the Wild Equity letter that was submitted to the Board Secretary on February 16, 2017.

Thanks,

Melinda

**Melinda Hue, AICP, LEED AP
Environmental Planner**

Planning Department | City and County of San Francisco
1650 Mission Street, Suite 400, San Francisco, CA 94103
Direct: 415-575-9041 | Fax: 415-558-6409
Email: melinda.hue@sfgov.org
Web: www.sfplanning.org



SAN FRANCISCO PLANNING DEPARTMENT

MEMO

Appeal of Final Environmental Impact Report Natural Resources Management Plan

DATE: February 27, 2017
TO: Angela Calvillo, Clerk of the Board of Supervisors
FROM: Lisa M. Gibson, Acting Environmental Review Officer – (415) 575-9032
Jessica Range, Senior Environmental Planner – (415) 575-9018
Melinda Hue, Environmental Coordinator – (415) 575-9041
RE: File No. 170044, Planning Case No. 2005.0912E
Appeal of the Final Environmental Impact Report for the Natural Resources
Management Plan (formerly the Significant Natural Resources Area
Management Plan)
HEARING DATE: February 28, 2017

1650 Mission St.
Suite 400
San Francisco,
CA 94103-2479

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

PROJECT SPONSOR: San Francisco Recreation and Parks Department
APPELLANT: Brent Planter, Wild Equity Institute
Dee Seligman, Rupa Bose, and Tom Borden, San Francisco Forest Alliance

INTRODUCTION

This memorandum is a response to two supplemental appeal letters submitted to the Board of Supervisors (the “Board”) regarding the Planning Department’s (the “Department”) issuance of a Final Environmental Impact Report (“Final EIR”) under the California Environmental Quality Act (“CEQA Determination”) for the Natural Resources Management Plan (the “Project”).¹ The Final EIR was certified by the Planning Commission (the “Commission”) on December 15, 2016. The Recreation and Parks Commission approved the project on December 15, 2016. Two appeals of the Final EIR to the Board were filed.

The first appeal to the Board was filed by Dee Seligman, Rupa Bose, and Tom Borden of the San Francisco Forest Alliance (the “SF Forest Alliance Appellant”) on January 5, 2017. The SF Forest Alliance Appeal Letter is part of Board of Supervisors File No. 170044.² The second appeal was filed by Brent Plater of the Wild Equity Institute on behalf of the Sierra Club’s San Francisco Bay Chapter, the National Parks

¹ The Significant Natural Resource Areas Management Plan (or SNRAMP) is now referred to as the Natural Resources Management Plan (or NRMP) as the San Francisco Recreation and Parks Department has updated the name of the Plan.

² A copy of the SF Forest Alliance Appeal Letter can be accessed here:
<https://sfgov.legistar.com/View.ashx?M=F&ID=4924313&GUID=0421B939-FD4D-4137-999D-045B5FD7BB42>

Conservation Association, Golden Gate Audubon Society, and the Sequoia Audubon Society (the "Wild Equity Appellant") on January 17, 2017.³ The Wild Equity Appeal Letter is part of Board of Supervisors File No. 170044.⁴

The Planning Department provided a response to these two Appeal Letters on February 17, 2017 ("Original Planning Department Appeal Response"). The Planning Department Appeal Response is part of Board of Supervisors File No. 170044.⁵

On February 17, 2017, a Supplemental Appeal Letter was filed by the SF Forest Alliance ("Supplemental SF Forest Alliance Appeal Letter") and a Supplemental Appeal Letter was also filed by the Wild Equity Appellant ("Supplemental Wild Equity Appeal Letter"). These two additional letters are a part of Board of Supervisors File No. 170044.^{6,7}

APPELLANT ISSUES AND PLANNING DEPARTMENT RESPONSES

The concerns raised in the Supplemental SF Forest Alliance Appeal Letter and the Supplemental Wild Equity Appeal Letter, are summarized below and are followed by the Department's responses.

Neither of the Supplemental Appeal Letters contain any new information that was not generally already addressed in the Original Planning Department Appeal Response or EIR or that would change any of the conclusions reached in the EIR. The Planning Department finds the Appellants' arguments to be without merit.

Issue 1: The SF Forest Alliance Appellant asserts that the Final EIR should include a mitigation measure to address the significant and unavoidable cumulative impacts related to the physical deterioration of recreational facilities resulting from increased dog use due to the reduction of Dog Play Areas (DPAs) in the NRMP and dog restrictions proposed in the Golden Gate National Recreation Area (GGNRA) Dog Management Plan.

Response 1: It is speculative to precisely predict the magnitude and/or location of redistribution of dog play area users, level of future restrictions within and outside of Natural Areas and GGNRA lands, and physical factors, such as driving distances. Therefore, a mitigation measure such as the addition of a new DPA may

³ Save the Frogs! did not submit comments on the Draft Environmental Impact Report or submit comments at a public hearing on the EIR. For this reason, Save the Frogs! did not meet the requirements of Chapter 31 of the San Francisco Administrative Code to appeal the certification of the Final EIR to the Board of Supervisors.

⁴ A copy of the Wild Equity Appeal Letter can be accessed here:

<https://sfgov.legistar.com/View.ashx?M=F&ID=4924316&GUID=6CA60239-9847-404D-A193-B3CBC9D82A65>

⁵ A copy of the Planning Department Appeal Response can be accessed here:

<https://sfgov.legistar.com/View.ashx?M=F&ID=4978450&GUID=71FF8310-2FAA-415F-9640-5F5C685D9CB2>

⁶ A copy of the supplemental SF Forest Alliance Appeal Letter can be accessed here:

<https://sfgov.legistar.com/View.ashx?M=F&ID=4976377&GUID=F1E4BB4D-879F-4DCC-ADF0-839A17B8F9BB>

⁷ A copy of the supplemental Wild Equity Appeal Letter can be accessed here:

<https://sfgov.legistar.com/View.ashx?M=F&ID=4976396&GUID=55DC8CDD-6201-4B8E-BC87-7BB95A5E7F11>

not mitigate impacts to recreational facilities, and the EIR appropriately concludes that the proposed project would result in a significant and unavoidable cumulative impact.

The EIR concludes that the proposed closure and reduction of DPAs would not result in significant impacts to recreational resources (Impact RE-1 and Impact RE-4). However, when proposed DPA restrictions are combined with dog access restrictions resulting from the GGNRA Dog Management Plan, the Draft EIR conservatively determines that the cumulative impact of these two projects could accelerate the physical deterioration of the remaining DPAs and the Natural Areas in general (Impact RE-7 on Draft EIR pp. 261 to 262), resulting in a significant and unavoidable impact.

As discussed starting on RTC p. 4-314, the potentially significant cumulative impact to recreational resources as a result of increased use of recreational facilities resulting from actions in the NRMP and GGNRA Dog Management Plan may not mitigate impacts from reducing or closing DPAs because it is speculative to precisely predict the magnitude or location of redistribution of dog walkers related to the implementation of the NRMP in combination with the GGNRA Dog Management Plan. Numerous factors are difficult to predict, including human behavior, level of future restrictions within and outside of the Natural Areas and GGNRA lands, and physical factors, such as driving distances. Therefore, no feasible mitigation exists that would reduce this impact to a less-than-significant level. Thus, the EIR appropriately concludes that the proposed project would result in a significant and unavoidable cumulative impact related to the physical deterioration of recreational facilities resulting from increased dog use due to the reduction of DPAs and the GGNRA Dog Management Plan.

Issue 2: The SF Forest Alliance Appellant asserts that the EIR fails to address restrictions to the access of the Natural Areas, including the closure of trails, installation of fencing, and installation of signs requesting the public stay on designated trails and restricting and/or prohibiting bicycle use. The SF Forest Alliance Appellant states that such restrictions are an environmental justice issue.

Response 2: The Final EIR adequately analyzes the impacts of trail closures and appropriately concludes that such closures would result in less-than-significant recreation impacts. The Appellant has not provided evidence that such closures would result in an economic or social effect that would in turn cause a significant physical impact on the environment. As detailed in the EIR, the NRMP proposes fencing to restrict access to sensitive habitat areas (only under certain circumstances) and not restrict access to trails, and such fencing would not result in a substantial demonstrable change to aesthetic conditions. The management of trail use, as done through the installation of signage, is an existing SFRPD practice that would not change substantially with the NRMP.

Trail Closure

The SF Forest Alliance Appeal Letter claims that the extent of intended trail closures is not disclosed in the NRMP and not evaluated in the EIR, and that the trail closures would result in a significant environmental effect on recreation. This concern is fully addressed in the Original Planning Department Appeal Response #2.

As stated in the Original Planning Department Appeal Response, Response #2, the NRMP calls for the creation of 5,897 feet (1.1 miles) of new trails and the closure or rerouting of 54,411 feet (10.31 miles) of social trails. However, trail access would be maintained in all Natural Areas, contrary to the Appellant's

assertion that access would be limited to 5% of park areas. The EIR concludes that creating new trails and closing some existing social trails could enhance the recreation experience offered by the Natural Areas by upgrading trails to be more user friendly through increased accessibility and improved trail conditions. As a result, the proposed project's trail-related activities would not limit access to, or result in the physical deterioration of the Natural Areas or any other recreation facilities. Therefore the Draft EIR appropriately concluded that this impact of the NRMP on recreational resources would be considered less than significant. The Appellant has not submitted any evidence that a significant recreation impact would occur from the proposed trail closures.

Additionally, as discussed on Draft EIR p. 175, trail development, rerouting, maintenance would not alter the existing land use of the project sites and vicinity and would not introduce new land uses, and would take place within existing Natural Areas; therefore, the NRMP would not physically divide any established community and the impact would be less than significant.

The Appellant also asserts that the closure of trails would result in environmental justice impacts. As stated in the Original Planning Department Appeal Response, Response #3, CEQA does not require the analysis of environmental justice impacts. Consistent with CEQA Guidelines Section 15064(e), economic and social changes caused by a proposed project are not themselves treated as significant effects on the environment. Additionally, the SF Forest Alliance Appellant does not provide any evidence that the NRMP at Bayview Park and McLaren Park would result in an economic or social impact that would in turn cause a significant effect on the environment.

Installation of Fencing

The SF Forest Alliance Appeal Letter asserts that the installation of fences as part of the NRMP would have a significant environmental effect in regards to recreation and aesthetics. This has been fully responded to in the Original Planning Department Appeal Response, Response #5. The NRMP does not propose restricting access to trails with fencing as the primary means. Rather, fencing would only be required to protect visitor safety and sensitive habitat. The installation of fencing would not restrict access to the use of trails maintained and deemed safe to use by the SFRPD. Installation of fencing would not result in a substantial, demonstrable negative change in aesthetic conditions. Therefore, the Draft EIR appropriately concludes on pp. 191 to 195 that the installation of fencing would result in less-than-significant aesthetic impacts.

Installation of Signs Requesting On-Trail Use and the Prohibition/Restriction of Bicycles

The SF Forest Alliance Appeal Letter asserts that the SFRPD has acted in violation of CEQA by installing signs at some Natural Area locations, requesting users stay on designated trails and prohibiting or restricting the use of bicycles. These concerns do not relate to the adequacy or accuracy of the information contained in the EIR and is fully addressed in the Original Planning Department Appeal Response, Response #7, and in the RTC.

The NRMP does not substantially change the SFRPD's approach to trail management. The SFRPD posts signs restricting or prohibiting activities that would either be inappropriate (e.g. the trail is too narrow or not constructed to support biking activity) – or – potentially destructive (e.g. creating land erosion conditions, compaction, endangering sensitive natural habitat). Trail management would not

significantly limit access to, or result in the physical deterioration of the Natural Areas or any other recreation facilities.

Issue 3: The SF Forest Alliance Appellant questions the methodology of the GHG and the CalEEMod analyses and questions whether the project is consistent with statewide GHG reduction targets.

Response 3: The GHG analysis was conducted based upon reputable sources, consistent with the Bay Area Air Quality Management District (BAAQMD's) CEQA Air Quality Guidelines, and the project would be consistent with applicable GHG reduction targets.

A stated in Original Planning Department Appeal Response, Response #8, the significance conclusion for the GHG analysis was based primarily on an assessment of whether the project was consistent with San Francisco's qualified GHG Reduction Strategy, which is the City's standard approach to evaluating GHG impacts for projects within San Francisco. For the Sharp Park Natural Area, GHG emissions resulting from the Laguna Salada Restoration project were modeled quantitatively and determined to be less than significant. The RTC also provided a quantitative assessment of changes in carbon sequestration rates that would occur with implementation of the NRMP.

GHG Quantification Methodology

The quantitative analysis of GHG emissions was conducted using a variety of tools from known, reputable sources, including the Urban Forestry Carbon Sequestration Workbook published by the U.S. Department of Energy,⁸ the Center for Urban Forest Research Tree Carbon Calculator published by the U.S. Forest Service,⁹ the *Good Practice Guidance for Land Use, Land Use Change and Forestry* published by the Intergovernmental Panel on Climate Change (IPCC)¹⁰ and the CalEEMod emissions estimator model supporting calculations.

While the CEQA guidelines do not expressly use the term "sequestration loss," the 2012 BAAQMD CEQA Air Quality Guidelines, which were published subsequent to Senate Bill 97 promulgating updates to CEQA to address GHG emissions, do address carbon sequestration. The purpose of the BAAQMD's CEQA Air Quality Guidelines is to assist lead agencies in evaluating the air quality impacts of projects proposed within the San Francisco Bay Area Air Basin. The Guidelines provide recommended procedures for evaluating potential air quality impacts during the environmental review process consistent with CEQA requirements. Specifically, Table 4-2 of the CEQA Air Quality Guidelines¹¹ provides guidance on which GHGs need to be accounted for based on the source analyzed. The category of "Loss of trees/vegetation" is described by an emissions type characterized as "Loss of sequestration". As such, the analysis in the EIR focused on changes in sequestration rates, rather than changes in the total amount of carbon sequestered. This is consistent with how GHG emissions are reported in CEQA documents as GHGs emitted per year.

⁸ U.S. Department of Energy, Urban Forestry Carbon Sequestration Workbook, 2007

⁹ U.S. Forest Service, Urban Forest Research Tree Carbon Calculator, 2005.

¹⁰ Intergovernmental Panel on Climate Change, National greenhouse Gas Inventories Programme, *Good Practice Guidance for Land Use, Land Use Change and Forestry*, 2003.

¹¹ Bay Area Air Quality Management District. California Environmental Quality Act (CEQA) Air Quality Guidelines. Updated May 2012. This document is available online at: <http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>, accessed 2/23/2017.

Furthermore, the CEQA Air Quality Guidelines specifically address anthropogenic versus biogenic emissions when conducting a GHG analysis under CEQA. Specifically, page 4-5 of the Air Quality Guidelines state:

"Biogenic CO₂ emissions should not be included in the quantification of GHG emissions for a project. Biogenic CO₂ emissions result from materials that are derived from living cells, as opposed to CO₂ emissions derived from fossil fuels, limestone and other materials that have been transformed by geological processes. Biogenic CO₂ contains carbon that is present in organic materials that include, but are not limited to, wood, paper, vegetable oils, animal fat, and food, animal and yard waste."

Although a quantitative analysis of GHG emissions resulting from changes in vegetation was conducted in the EIR, it should be noted that biomass accumulated in existing trees and vegetation will eventually be released into the atmosphere regardless of the proposed NRMP. Consequently, the analysis of the EIR focused on the change in GHGs that would occur solely from implementation of the Plan (i.e., changes in sequestration rates).

Table 4-2 in the CEQA Air Quality Guidelines also specifies the GHGs that should be considered for each source. For many anthropogenic sources, the GHGs to be evaluated include carbon dioxide, methane, and nitrous oxide. However for sources that would result in a loss of sequestration, the only GHG specified to be considered is carbon dioxide. Methane is not included. As discussed above, BAAQMD's guidance on estimating GHG impacts specifically excludes biogenic emissions which would include methane emissions that would be released irrespective of the proposed project. Therefore, the GHG analysis of carbon sequestration considers carbon dioxide emissions from loss of sequestration, consistent with BAAQMD's CEQA Air Quality Guidelines for assessing a project's GHG impacts. Methane emissions are included in the estimate of GHGs associated with equipment that would be used during the Laguna Salada Restoration Project.

In regards to concerns that the GHG analysis should have considered a 100-year window as the active sequestration phase of trees, versus the 20-year window used in the analysis, the use of a 20-year window of active tree sequestration is commonly accepted practice for sequestration calculations by multiple sources.^{12, 13}

The SF Forest Alliance Appellant states that the CalEEMod's methodology of estimating GHG sequestration per acre underestimates GHG sequestration rates. The Appellants are correct, and that is why the CalEEMod sequestration rates were only used for grasslands because such rates were not published in any other the publically available tools consulted. The calculations for GHG estimates in the EIR apply a species-specific sequestration rate for eucalyptus and pine trees of 118 and 74.2 kilograms per tree per year, respectively.

¹² California Air Pollution Control Officers Association (CAPCOA), CalEEMod Users Guide Appendix A, Calculation Details for CalEEMod, September, 2016. Page 52.

¹³ Intergovernmental Panel on Climate Change, National greenhouse Gas Inventories Programme, Good Practice Guidance for Land Use, Land Use Change and Forestry, 2003. Page 3.298.

GHG emissions from wetland dredging

The SF Forest Alliance Appellant states that the EIR failed to estimate the GHG emissions that would be associated with decomposition of dredged material. Wetlands act as both a carbon sink due to carbon sequestration as well as a carbon source resulting from methane generation. Recent studies indicate that wetlands are likely a net GHG sink "because they support both rapid rates of carbon sequestration and low methane emissions."¹⁴ However, given the lack of science around plant-specific carbon sequestration rates that are not related to forestry or agriculture, a quantitative estimate of the net carbon benefits or impacts of wetlands creation was not undertaken for this analysis. Furthermore, see Response #7 below, which summarizes the EIR's conclusions with respect to wetland impacts, determining that the NRMP would not result in a significant impact on wetlands.

Consistency with GHG targets

The SF Forest Alliance Appellant requests an analysis of how the project is consistent with the methane reduction targets in Assembly Bill 1383 and questions whether the proposed project is consistent with statewide GHG targets for years 2020, 2030, and 2050.

With regard to SB 1383, this bill requires the state Air Resources Board, in consultation with the Department of Food and Agriculture, to adopt regulations to reduce methane emissions from livestock manure management operations and dairy manure management operations. The bill has no relevance to the proposed NRMP or CEQA analysis thereof.

With regard to other statewide GHG reduction goals, at the end of the 20 year horizon window of the NRMP, there would be a calculated net gain of sequestration due to the removal of an aging eucalyptus tree population which would be replaced with more efficiently sequestering tree and plant growth which would hence be consistent with the GHG reduction targets for 2020, 2030, and 2050. Furthermore, the proposed project was found to be in compliance with San Francisco's GHG Reduction Strategy. The GHG reduction actions in this strategy have resulted in a 23.3 percent reduction in GHG emissions in 2012 compared to 1990 levels,¹⁵ exceeding the year 2020 reduction goals outlined in the BAAQMD's 2010 *Clean Air Plan*,¹⁶ Executive Order S-3-05¹⁷, and Assembly Bill 32 (also known as the Global Warming Solutions Act).^{18,19} In addition, San Francisco's GHG reduction goals are consistent with, or more aggressive than,

¹⁴ Bridgeham, Scott D., et. al., *The Carbon Balance of North American Wetlands*, December 2006.

¹⁵ ICF International, *Technical Review of the 2012 Community-wide GHG Inventory for the City and County of San Francisco*, January 21, 2015. Available at http://sfenvironment.org/sites/default/files/fliers/files/icf_verificationmemo_2012sfcommunityinventory_2015-01-21.pdf, accessed March 16, 2015.

¹⁶ Bay Area Air Quality Management District, *Clean Air Plan*, September 2010. Available at <http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans>, accessed March 3, 2016.

¹⁷ Office of the Governor, *Executive Order S-3-05*, June 1, 2005. Available at <https://www.gov.ca.gov/news.php?id=1861>, accessed March 3, 2016.

¹⁸ California Legislative Information, *Assembly Bill 32*, September 27, 2006. Available at http://www.leginfo.ca.gov/pub/05-06/bill/asm/ab_0001-0050/ab_32_bill_20060927_chaptered.pdf, accessed March 3, 2016.

¹⁹ Executive Order S-3-05, Assembly Bill 32, and the Bay Area 2010 Clean Air Plan set a target of reducing GHG emissions to below 1990 levels by year 2020.

the long-term goals established under Executive Orders S-3-05,²⁰ B-30-15,^{21,22} and Senate Bill (SB) 32.^{23,24} Therefore, the NRMP is consistent with statewide GHG reduction goals.

Issue 4: The SF Forest Alliance Appellant asserts that the Final EIR did not adequately disclose that herbicide use would increase with the NRMP given the number of trees proposed for removal.

Response 4: Herbicide use under the NRMP is expected to be similar to current levels of use because existing routine maintenance activities would continue and tree removal would occur gradually over a 20-year period.

The SF Forest Alliance Appeal Letter asserts that the EIR's conclusion that herbicide use following the implementation of the NRMP would not substantially increase is false and that the removal of the number of trees proposed by the NRMP would necessitate an increase in the use of herbicides. This issue is fully responded to in the Original Planning Department Appeal Response, Response #4. Pesticide use under the NRMP is expected to be substantially similar to the current use of pesticides in Natural Areas because the NRMP would apply herbicides in accordance with the City's Integrated Pest Management (IPM) Program, in which pesticide use in the Natural Areas would be as little as possible to achieve the desired results and carefully monitored, and tree removal would occur gradually over the course of 20 years.

Issue 5: The SF Forest Alliance Appellant alleges that the environmental review process for the NRMP violated CEQA because the RTC contained new information that should have been circulated for public review, that the joint hearing with the Recreation and Parks Commission and Planning Commission for

²⁰ Executive Order S-3-05 sets forth a series of target dates by which statewide emissions of GHGs need to be progressively reduced, as follows: by 2010, reduce GHG emissions to 2000 levels (approximately 457 million metric tons of carbon dioxide equivalents (MTCO₂E)); by 2020, reduce emissions to 1990 levels (approximately 427 million MTCO₂E); and by 2050 reduce emissions to 80 percent below 1990 levels (approximately 85 million MTCO₂E). Because of the differential heat absorption potential of various GHGs, GHG emissions are frequently measured in "carbon dioxide-equivalents," which present a weighted average based on each gas's heat absorption (or "global warming") potential.

²¹ Office of the Governor, *Executive Order B-30-15*, April 29, 2015. Available at <https://www.gov.ca.gov/news.php?id=18938>, accessed March 3, 2016. Executive Order B-30-15 sets a state GHG emissions reduction goal of 40 percent below 1990 levels by the year 2030.

²² San Francisco's GHG reduction goals are codified in Section 902 of the Environment Code and include: (i) by 2008, determine City GHG emissions for year 1990; (ii) by 2017, reduce GHG emissions by 25 percent below 1990 levels; (iii) by 2025, reduce GHG emissions by 40 percent below 1990 levels; and by 2050, reduce GHG emissions by 80 percent below 1990 levels.

²³ Senate Bill 32 amends California Health and Safety Code Division 25.5 (also known as the California Global Warming Solutions Act of 2006) by adding Section 38566, which directs that statewide greenhouse gas emissions to be reduced by 40 percent below 1990 levels by 2030.

²⁴ Senate Bill 32 was paired with Assembly Bill 197, which would modify the structure of the State Air Resources Board; institute requirements for the disclosure of greenhouse gas emissions criteria pollutants, and toxic air contaminants; and establish requirements for the review and adoption of rules, regulations, and measures for the reduction of greenhouse gas emissions.

certification of the EIR and consideration of approval of the NRMP did not allow for members of the public to make separate comments on the EIR and the merits of the project, and that the calendar language for the hearing violated Chapters 31 and 67 of the San Francisco Administrative Code.

Response 5: The RTC contained no new information that requires recirculation under CEQA and the CEQA Guidelines. The procedures through which the joint hearing with the Recreation and Parks Commission and Planning Commission were held did not violate the San Francisco Administrative Code or any other legal requirements.

The SF Forest Alliance Appellant states that the EIR should have been recirculated for public review because the RTC contained additional quantitative analysis of the project's GHG emissions, the RTC concluded that the amount and frequency of pesticide applications as a result of the NRMP would be similar to what currently occurs in the Natural Areas and what has occurred over the past 10 years and the RTC modified Mitigation Measure M-BI-6a to address the potential for acidic sulfate soils to be present during dredging activities. Additions to the EIR made as part of the RTC do not constitute significant new information requiring recirculation. Pursuant to CEQA Guidelines Section 15088.5, significant new information that requires recirculation includes: 1) the identification of a new significant impact that would result from the project or a new mitigation measure proposed to be implemented; 2) a substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance; 3) a feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents have declined to adopt it; and 4) the draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. None of the information contained in the RTC requires recirculation under CEQA (California PRC Section 21092.1) and the CEQA Guidelines (14 CCR Section 15088.5).

The SF Forest Alliance Appellant also asserts that the procedures through which the joint hearing with the Recreation and Parks Commission and Planning Commission were held violated the intent of San Francisco Administrative Code by combining the public comment on the adequacy and accuracy of the EIR with the public comment on the merits of the project and that the agenda did not contain information required in Chapters 31 and 67 of the San Francisco Administrative Code.

RTC Contained No New Information Requiring Recirculation under CEQA

The topic of GHGs was addressed in the Initial Study. Between the Initial Study and the Draft EIR the Bay Area Air Quality Management District (BAAQMD) released updated CEQA Air Quality Guidelines including adding new thresholds of significance for GHG emissions. Therefore, the EIR included an updated analysis of GHG impacts from the project under these new guidelines and concluded that the GHG impact of the proposed project would remain less than significant. For projects within San Francisco, GHG impacts are addressed based on whether a project is consistent with San Francisco's *Strategies to Address Greenhouse Gas Emissions*. As explained on Draft EIR page 452, BAAQMD finds that this document meets the criteria of a Qualified GHG Reduction Strategy. All of the NRMP activities within San Francisco were evaluated based on compliance with this strategy and found to be consistent with the strategy. For Sharp Park, a quantitative analysis of GHG impacts was conducted and disclosed in the EIR along with a programmatic analysis of changes in carbon sequestration resulting from

proposed tree removal and planting. The EIR concluded that changes in vegetation would not result in a substantial increase in GHGs and GHG impacts would remain less than significant. RTC Response GG-1 on pages 4-297 through 4-302 contains additional quantitative analysis of GHG impacts that would result from implementation of the proposed project. This information was provided in the RTC to address concerns raised regarding the draft EIR's quantitative analysis. This additional analysis did not change any of the conclusions of the EIR and did not constitute significant new information under CEQA Guidelines Section 15088.5, and therefore do not require recirculation under CEQA.

In regards to the amount and frequency of pesticide applications, the RTC does not contain any new significant information requiring recirculation under CEQA Guidelines Section 15088.5. Also see Response #4 in this Supplemental Appeal Response. The concerns regarding amendments to Mitigation Measure M-BI-6a have been fully responded to the Original Planning Department Appeal Response, Response #15. That response concludes that amendments to Mitigation Measure M-BI-6a do not require recirculation under CEQA.

Hearing Procedures and Notice Met the Requirements of the Administrative Code

First, the SF Forest Alliance Appellant expresses concerns that the joint hearing with the Planning Commission and Recreation and Parks Commission's procedure that combined the public comment on the adequacy and accuracy of the draft EIR and the merits of the project circumvented the intent of Administrative Code Section 67.15 by allowing members of the public to speak only once on both items. The SF Forest Alliance Appellant acknowledges, however, that the hearing complied legally with Administrative Code Section 67.15. Tom Borden, one of the SF Forest Alliance Appellants, has filed a complaint with the Sunshine Ordinance Task Force on this matter. Section 67.15 requires that an opportunity for members of the public to address a policy body on items of interest within the policy's jurisdiction for every agenda item. At the December 15, 2016 joint hearing on the Final EIR and approval of the NRMP, the public was provided an opportunity to address the Planning Commission regarding the Final EIR. As a special joint meeting, that opportunity was combined with the Recreation and Parks Commission item to consider approval of the underlying project, the NRMP. In part, this was done because the public comment on the Draft EIR had already ended, and the certification of a Final EIR by the Planning Commission for a project is considered part of the approval process for the project. However, it is also common practice for the Planning Commission to call all approval actions for a given project together and to provide one comment period during a given hearing for all proposed approval actions on the same project. As a matter of practice, the Planning Commission regularly calls both certification of an EIR and any related project approvals together when they are all on the same hearing calendar, and affords one comment period for all of the related items. The fact that this was done at a joint hearing between the two Commissions does not result in any violation of the Administrative Code or any other legal requirement.

With regard to the Draft EIR, the first public comment period for the Draft EIR was from August 31, 2011 through October 31, 2011, and a second public comment period was provided between April 27, 2012 through June 11, 2012. The Planning Commission held a duly noticed public hearing on the Draft EIR where the public was afforded an opportunity to address the Planning Commission on the adequacy and accuracy of the document on October 6, 2011. As noted above, at the time of the joint certification and project approval hearing, the public comment period for the Draft EIR was closed. However, because certification of the Final EIR was an agency item, and in compliance with Administrative Code Section 67.15, the public was afforded an opportunity to address the Commission.

Second, the SF Forest Alliance Appellants are incorrect in that the hearing notice for the joint hearing with the Planning Commission and Recreation and Park's Commission did not contain the required information on the appeal rights of the Final EIR as specified in San Francisco Administrative Code Section 31.15 or the information required under Administrative Code Section 67.7 (g) "Know Your Rights Under the Sunshine Ordinance." The agenda item for the hearing posted on the Department's website included two hyperlinks, the hyperlink titled "Ordinances and Accessibility" includes the required information under Administrative Code Section 67.7 (g) "Know Your Rights Under the Sunshine Ordinance" and the second hyperlink titled "Hearing Procedures" lists the appeal rights specified in San Francisco Administrative Code Section 31.15.

In certifying the EIR, the Planning Commission must find that the EIR is in compliance with CEQA, the CEQA Guidelines and Chapter 31 of the Administrative Code. As discussed above, the hearing agenda included the required information regarding appeal rights as specified in Chapter 31 of the Administrative Code.

Issue 6: The SF Forest Alliance Appellant states that the EIR is biased because it contains a number of statements that are not true.

Response 6: The Department has conducted its own objective, independent review of all information pertaining to the environmental analysis of the proposed NRMP.

The SF Forest Alliance Appellant claims that the EIR includes a number of statements that are not true primarily in regards to the greenhouse gas analysis and supporting documentation, but also concerning responses provided in the RTC that were provided for informational purposes and unrelated to the environmental analysis of the proposed NRMP.

Greenhouse Gas Analysis and Supporting Documentation

CEQA Guidelines Section 15084(e) states the following: "Before using a draft prepared by another person, the Lead Agency shall subject the draft to the agency's own review and analysis. The draft EIR which is sent out for public review must reflect the independent judgement of the Lead Agency. The Lead Agency is responsible for the adequacy and objectivity of the draft EIR." The Department has conducted its own independent review of the environmental analysis and all supporting documentation prepared for the NRMP in compliance with PRC Section 21082.1(c) and CEQA Guidelines Section 15084(e).

Regarding the forest management objectives of the NRMP, please see Original Planning Department Appeal Response, Response #1. In terms of the GHG analysis specifically, please see Original Planning Department Appeal Response, Response #8 and Response #3 in this Supplemental Appeal Response addressing the quantitative analysis of GHGs presented in the EIR. In an effort to provide the additional quantitative analysis of GHGs that was presented in the EIR, the Department requested an analysis from HORT Science estimating the percentage of Blue Gum Eucalyptus that is at least 20 years or older. The information provided by HORT Science was based on an assessment of 800 Blue Gum Eucalyptus in Pine Lake, Glen Canyon, Mount Davidson and McLaren Parks. This assessment was determined by the Department to be an appropriate approximation of the percentage of Blue Gum Eucalyptus that is at least 20 years or older, especially given the programmatic nature of the analysis of large-scale tree removal activities proposed under the NRMP.

Information Provided in the RTC Unrelated to the Environmental Analysis of the NRMP

A number of comments were submitted on the EIR that do not pertain to the adequacy or accuracy of the environmental analysis of the proposed NRMP. The Department, nonetheless, consulted with the Recreation and Parks Department regarding these comments and provided responses for informational purposes. The concerns expressed by the SF Forest Alliance Appellant regarding inaccurate statements in the RTC concerning the previous removal of a bench from Mount Davidson, do not relate to the adequacy or accuracy of the environmental analysis of the proposed NRMP and are best directed to the Recreation and Parks Department. In regards to the statement in the RTC that the Miraloma Trail was closed prior to beginning the environmental review of the NRMP, the Recreation and Parks Department has indicated that trails on the southwestern edge of the canyon (to which it is believed the commenter refers to as the Miraloma Trail) are discouraged because that side of the canyon has a rich accumulation of habitat and wildlife. The Recreation and Park's Department has actively been removing social trails that appear on this edge of the park whenever they appear because they are unsafe for public access. However, these social trails often reoccur even after restoration. Regardless, the comment does not relate to the adequacy or accuracy of the environmental analysis of the proposed NRMP and are best directed to the Recreation and Park's Department.

Issue 7: The Wild Equity Appellant asserts that the EIR fails to analyze the impacts to wetlands as defined by the California Coastal Commission (CCC) that are located on Sharp Park Golf Course fairways where dredged materials may be disposed.

Response 7: The EIR concludes that placement of dredged materials along the Sharp Park Golf Course fairways would not cause significant physical environmental impacts to wetlands. To the extent that these existing fairways may be considered wetlands by the CCC, it would pose additional regulatory requirements, which have been disclosed in the Draft EIR, but would not change the environmental impacts analysis in the EIR.

As part of the Laguna Salada Restoration Project, dredged materials could be accommodated on the Sharp Park Golf Course in areas currently used as fairways (associated with Holes 10, 14, 15, and 18) and existing Hole 18, in the east portion of the Laguna Salada. As indicated in Draft EIR Figure 3 (as updated per the December 15, 2016 EIR Errata, Attachment A to the Original Planning Department Appeal Response), these are just some of the potential locations for placement of dredged materials.

These areas are currently used as an operational golf course (i.e., mown fairways and a hole) and would remain as an operational golf course (i.e., mown fairways and a hole) after the project is completed. The NRMP does not propose to convert any marsh areas to fairways or other golf course uses. The Draft EIR concluded that the potential disposal of the dredged materials in areas currently used as fairways (associated with Holes 10, 14, 15, and 18) and existing Hole 18 would not cause significant physical environmental impacts, including, but not limited to, impacts to hydrology, biological resources, cultural resources, or aesthetics, as compared to baseline conditions.

To the extent that the existing fairways and Hole 18 may be considered wetlands by the CCC, and thus would pose additional regulatory requirements, those regulatory requirements are disclosed in the Draft

EIR starting on page 271 and explained further below. These potential regulatory requirements do not change the environmental impacts analysis from a CEQA perspective.

Within the total of 23 acres of U.S. Army Corps of Engineers (USACE) jurisdictional wetlands within the NRMP restoration and management areas, the total area of short-term and long-term impacts to USACE wetlands as a result of the NRMP restoration and management activities at Sharp Park, as reflected on Draft EIR p. 338 (Table 11), is 5.5 acres. In terms of the nature of the impacts, as stated on Draft EIR p. 338:

"Short-term impacts associated with the Laguna Salada restoration project include soil compaction and vegetation loss as a result of vehicle and heavy equipment use in and around the wetlands. As described in Section III.F.2 (page 104), following completion of each season's restoration activities, these areas would be scarified, recontoured, planted and hydroseeded with native vegetation to approximate their pre-disturbance condition, as needed based on the level of disturbance.

Long-term impacts to wetlands at Sharp Park would occur as a result of restoration activities that would include dredging existing wetlands and recontouring the shoreline to create optimal habitat for California red-legged frog and San Francisco garter snake."

Draft EIR p. 339 goes on to say:

"Restoration activities would be consistent with the ultimate goals of the Sharp Park restoration, which are to enhance habitat quality for protected species and other native wildlife, in addition to diversifying existing wetlands. The Sharp Park restoration project would restore and enhance the biological functionality of the wetland and upland complex to better support the various species present within that habitat system and would not be considered a substantial adverse effect to the Laguna Salada wetland complex. As a result, the Sharp Park restoration project is expected to result in long-term beneficial impacts to the wetland complex."

To address impacts to wetlands—whether as designated by the USACE or the CCC, and whether as anticipated in the Draft EIR or as may exist at the time restoration and maintenance activities commence—Draft EIR pp. 339 and 340 states that:

"Prior to implementing the proposed Sharp Park restoration activities, the SFRPD would be required to obtain a USFWS Biological Opinion, SFBRWQCB Section 401 water quality certification, a USACE Section 404 permit, and a coastal development permit from the California Coastal Commission; a CDFG streambed alteration agreement may also be required. These resource agencies may require protective wetland measures in addition to Mitigation Measures M-BI-12a and M-BI-12b, as discussed below.

Implementing Mitigation Measure M-BI-12a requires the SFRPD to limit impacts on wetlands and water quality. Mitigation Measure M-BI-12b requires SFRPD to prepare a mitigation plan as part of the application for Section 401 water quality certification. Mitigation Measure M-BI-12a also incorporates requirements of both Sections 401 and 404 of the Clean Water Act and the CCC. Mitigation Measure M-BI-12b requires that the SFRPD prepare a monitoring program which would ensure that success criteria would be established to ensure that restoration of the Laguna Salada wetland complex is achieving the project objectives. Success criteria may include annual goals for the percent cover of native wetland vegetation, limitations on the amount of invasive

species cover permissible, and the presence of hydric soils and wetland hydrology. With implementation of Mitigation Measures M-BI-12a and M-BI-12b, the Sharp Park restoration would not have a substantial adverse effect on wetlands protected under Section 404 of the Clean Water Act, resulting in a less than significant impact.”

Whether or not additional areas are subject to CCC wetland delineation, the Draft EIR concluded that placing the dredged materials on fairways and Hole 18 would not cause significant physical environmental impacts, including, but not limited to, impacts to hydrology, biological resources, cultural resources, or aesthetics, as compared to baseline conditions. However, to the extent the CCC may determine that these areas qualify as wetlands, SFRPD would seek necessary permits and comply with any conditions required by the CCC. During the permit application process, all of the agencies, including the CCC, would make a final determination of existing and impacted wetland areas associated with the NRMP project.

Issue 8: The Wild Equity Appellant asserts that the EIR failed to evaluate the proposed Sharp Park project included in the Notice of Preparation and Initial Study and this alternative would avoid the project's air quality impacts, impacts to California Coastal Commission wetlands and would reduce the project's impacts to historic resources and recreational resources.

Response 8: The EIR evaluated the project proposed by SFRPD and evaluated a reasonable range of alternatives that would avoid or substantially reduce the proposed project's significant and unavoidable impacts.

The EIR analyzed the project proposed by the SFRPD as described on draft EIR pp. 97 to 104. Draft EIR page 107 describes the changes made to the NRMP since publication of the Notice of Preparation and Initial Study, clarifying that management actions at Sharp Park were modified to add a detailed description of the Laguna Salada Restoration Project, which enabled the Department to conduct a project-level analysis of this action in the EIR. As stated in Original Planning Department Appeal Response, Response #9, the EIR does not dictate what project is brought forth for environmental review by the SFRPD.

The Appellant's claims that the original proposed NRMP activities at Sharp Park would avoid the significant and unavoidable air quality impacts identified in the EIR are not correct. The Initial Study evaluated air quality impacts and determined they would be less than significant. However, in 2010, following publication of the Initial Study, the BAAQMD updated their Air Quality Guidelines and significance thresholds, as discussed in Supplemental Appeal Response #3, above. A number of the significance thresholds for criteria air pollutant emissions were reduced substantially.

The BAAQMD's 2010 Air Quality Guidelines necessitated an updated analysis of air quality impacts in the Draft EIR. Draft EIR Table 15, page 433, presents the results of the updated criteria air pollutant analysis for the Laguna Salada Restoration Project. As shown in this table, NOx emissions (a criteria pollutant) from the project would be 153 lbs/day, or nearly three times above the significance threshold established by the BAAQMD. Therefore, the reduced scope for the Laguna Salada Restoration Project, as proposed by the Wild Equity Appellant, would not necessarily reduce the significant and unavoidable NOx impact identified in the EIR.

Furthermore, the EIR included a No Project Alternative, Maintenance Alternative, Maximum Recreation Alternative, and Maximum Restoration Alternative. The EIR found that the Maintenance Alternative would reduce air quality impacts, but that other programmatic projects evaluated under the NRMP could result in significant and unavoidable air quality impacts. This alternative would also avoid the significant and unavoidable impacts to the Sharp Park Golf Course as an historic resource and avoid impacts to the golf course as a recreational resource because it would not require removal of Hole 12. Finally, the Maintenance Alternative would result in a less-than-significant with mitigation impact on wetlands. Thus, the EIR evaluated an alternative that would reduce the significant air quality, historic resource, and recreational impacts identified. This is in accordance with the CEQA Guidelines, which state that an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. Additionally, the CEQA Guidelines state that an EIR need not consider every conceivable alternative to a project. Therefore, the EIR is not required to evaluate the Sharp Park project included in the Notice of Preparation and Initial Study as an alternative.

In regards to the change in the project description for Sharp Park in between the Notice of Preparation of an EIR/Initial Study and the Draft EIR, CEQA does not prohibit changes in the project description. CEQA does require a proposed project's impacts on the environment to be analyzed. The Draft EIR appropriately analyzed the Laguna Salada Restoration Project as proposed by the SFRPD. The project description for the Laguna Salada Restoration Project has not changed substantially since the publication of the Draft EIR in 2011. The Project Background section in the Original Planning Department Appeal Response provides an explanation regarding the development of the Laguna Salada Restoration Project. Because the Laguna Salada Restoration Project developed to a detail that allowed project-level environmental review, the EIR appropriately analyzed it at a project level.

Issue 9: The Wild Equity Appellant states that the Board of Supervisors should reject the Statement of Overriding Considerations adopted by the Recreation and Parks Commission in approving the NRMP.

Response 9: The Statement of Overriding Considerations is not before the Board of Supervisors for consideration.

Chapter 31 of the City's Administrative Code establishes the types of environmental review decisions that may be subject to appeal as well as the grounds for such an appeal. Chapter 31.16(a) establishes that (1) certification of a final EIR by the Planning Commission; (2) adoption of a negative declaration by the first decision-making body; and (3) determination by the Planning Department or any other authorized City department that a project is exempt from CEQA comprise the types of environmental decisions that may be appealable to the Board of Supervisors. Chapter 31.16(c)(3) states that the grounds for appeal of an EIR shall be limited to whether the EIR complies with CEQA, including whether it is adequate, accurate and objective, sufficient as an informational document, correct in its conclusions, and reflects the independent judgment and analysis of the City and whether the Planning Commission certification findings are correct. The project's Statement of Overriding Considerations and Findings fall outside of the types of CEQA determinations subject to appeal in Chapter 31 of the City's Administrative Code.

Moreover, project approvals are not considered within the scope of an EIR appeal because approvals are not the types of environmental review decisions subject to appeal as articulated in Chapter 31.

Issue 10: The Wild Equity Appellant requests the removal of the Sharp Park Laguna Salada Restoration Project from the EIR.

Response 10: Under CEQA, the EIR must analyze the project as proposed by the project sponsor, the SFRPD. The EIR does not dictate what project is brought forth for environmental review by the SFRPD. Additionally, CEQA contains no prohibition against analyzing two related projects in one EIR.

The Wild Equity Appellant requests to remove Sharp Park from the NRMP Final EIR. This issue is fully responded to in the Original Planning Department Appeal Response, Response #9. The request to remove the project from the EIR is not evidence that the Final EIR is inadequate. A summary is provided below regarding why it was appropriate to analyze the Laguna Salada Restoration Project in the EIR.

CEQA prohibits piecemealing, or dividing, one project into two or more projects, which can lead to an underestimation of the project's impacts on the environment. But CEQA contains no prohibition against analyzing two related projects in one EIR. In fact, CEQA provides that "[w]here one project is one of several similar projects of a public agency, but is not deemed a part of a larger undertaking or a larger project, the agency may prepare one EIR for all projects, or one for each project..." (CEQA Guidelines Section 15165.) Thus, it is up to the public agency to determine whether including multiple related, but separate, projects in one EIR is appropriate. The only requirement is that "in either case [the EIR must] comment upon the cumulative effect[s]" of the projects. (*Id.*) Here, combining the analysis of the project-level Laguna Salada Restoration Project with the programmatic analysis of other NRMP activities is consistent with and helps inform the analysis of the NRMP project as a whole.

Issue 11: The Wild Equity Appellant contends that Mitigation Measure M-BI-6a, Protection of Protected Species during implementation of the Sharp Park [Laguna Salada] Restoration Project is not authorized under Fish and Game Code Section 5050 and thus fails to mitigate impacts to the fully protected San Francisco garter snake.

Response 11: The proposed Laguna Salada Restoration Project is a recovery action for the San Francisco garter snake and thus Mitigation Measure M-BI-6a may be authorized under Fish and Game Code Section 5050.

This issue was addressed in Original Planning Department Appeal Response #15. As stated in that response, the purpose of the Laguna Salada Restoration Project is to enhance the Laguna Salada wetland complex to provide higher quality habitat for the fully protected San Francisco garter snake and one of its primary food sources, the California red-legged frog. As such, the Laguna Salada Restoration Project, consistent with the California Fish and Game Code Section 5050, is intended as a recovery action for the San Francisco garter snake. Thus, the trapping and transplantation of a fully protected species as part of a recovery program, such as the Laguna Salada Restoration Project, may be permitted by the California Department of Fish and Wildlife (CDFW).

To further support that the proposed Laguna Salada Restoration Project is a recovery action for the San Francisco garter snake, the following additional information is provided.

In 1985 the U.S. Fish and Wildlife Service (USFWS) published the *Recovery Plan for the San Francisco Garter Snake*,²⁵ in compliance with the federal Endangered Species Act. This Recovery Plan includes information about the species, its life history, historic and current distribution, reasons for decline and provides recommendations for recovery of the species with an implementation schedule. One of the recovery actions in the Recovery Plan is to protect the six known San Francisco garter snake colonies through appropriate management. One of the six colonies is the Sharp Park golf course at Laguna Salada. Actions identified by the USFWS for Sharp Park include:

- Secure the cooperation of the Sharp Park golf course administrators to manage and protect the San Francisco garter snake at Laguna Salada.
- Develop and implement a management plan for the San Francisco garter snake at Laguna Salada.
- Minimize adverse impacts to garter snakes at Laguna Salada from foot traffic, human encroachment, illegal collecting and chemical treatments.
- Monitor the San Francisco garter snake at Laguna Salada.

The Recovery Plan provides further details as to what a management plan at this site should achieve by stating the following:

“Snake use of this [Sharp Park] location appears to be limited by the availability of secure basking sites, foraging areas, and upland cover. It might be possible to increase snake use of the Laguna Salada pond by creating more useable edge. This could be accomplished by dredging small cove areas and creating shallow impoundments where appropriate vegetation could develop. Fencing around the pond and upland areas could prevent human encroachment from disturbing the snakes. Construction of rock or driftwood piles adjacent to the pond may provide additional cover for the snakes.”

The proposed Laguna Salada Restoration Project would include, among other activities, dredging of the wetland complex; recontouring freshwater marsh wetland and ruderal (disturbed) habitat along Laguna Salada, Horse Stable Pond, and the channel shorelines to create shallow water wetland habitat; creating an upland and wetland habitat corridor between Laguna Salada and Horse Stable pond; and creating upland refuge in Laguna Salada. As stated on Draft EIR page 98, the goals of the restoration are to restore and enhance the wetland and upland habitat for the benefit of the San Francisco garter snake and California red-legged frog, which will contribute to the recovery of these species. The actions proposed for the Laguna Salada Restoration Project would include many of the recovery actions identified by the USFWS in their Recovery Plan for the species. As stated in Original Planning Department Appeal Response, Response #15, California Fish and Game Code Section 5050 provides that the CDFW may “authorize the taking of a fully protected reptile or amphibian for necessary scientific research, including efforts to recover fully protected, threatened, or endangered species.” Thus, Mitigation Measure M-BI-6a which allows for the relocation of San Francisco garter snake –as a last resort after implementation of other measures during the Laguna Salada Restoration Project, may be authorized by CDFW. Further, this mitigation measure states that its requirements may be modified during the regulatory approval process, which cannot proceed until the NRMP EIR is certified. In summary, the proposed Laguna Salada

²⁵ U.S. Fish and Wildlife Service, 1985. Recovery Plan for the San Francisco Garter Snake (*Thamnophis Sirtalis Tetrataenia*). U.S. Fish and Wildlife Service, Portland, Oregon. 77pp.

Restoration Project is a recovery action for the San Francisco garter snake and therefore Mitigation Measure M-BI-6a may be authorized under Fish and Game Code Section 5050.

Issue 12: The Wild Equity Appellant asserts that the Final EIR does not adequately analyze how the proposed Laguna Salada Restoration Project may be affected by changes to the sea wall and future sea level rise.

Response 12: The Final EIR adequately analyzes the effects of the project on the environment as required by CEQA.

Sea Wall

The Wild Equity Appellant asserts that the Final EIR failed to analyze the cumulative impacts of the construction of a seal wall with the Laguna Salada Restoration Project. The Wild Equity Appellant also asserts that a new sea wall is a reasonably foreseeable cumulative project as it would be needed to protect the proposed project from salinity intrusion resulting from sea level rise.

Draft EIR p. 103 acknowledges that options for addressing current and future conditions of the sea wall have been considered, but those options are not proposed as part of the SNRAMP. Because a solution for the sea wall has not been proposed, speculating on that solution or solutions is not appropriate for the CEQA analysis; therefore, evaluation of potential actions to address the effects of sea level rise on the sea wall in the cumulative impact analysis is not appropriate at this time.

Sea Level Rise

The Wild Equity Appellant asserts that the Final EIR did not adequately analyze the impacts to the Laguna Salada Restoration Project from seal level rise. This issue was fully addressed in the Original Planning Department Appeal Response #13. CEQA requires the analysis of the project's impacts on the environment. CEQA only requires the analysis of the environment (in this case, sea level rise) on the project only to the extent that the project (the Laguna Salada Restoration Project) exacerbates sea level rise. The project would not result in significant environmental effects that would exacerbate sea level rise.

San Francisco Sea Level Rise Action Plan

The Wild Equity Appellant asserts that the Final EIR is not consistent with the San Francisco Sea Level Rise Action Plan. This issue is fully responded to in the Original Planning Department Appeal Response #13. The San Francisco Sea Level Rise Action Plan is not an adaptation plan and it is unknown at this point what strategies would be proposed in a future adaptation plan and whether or not they would be applicable to Sharp Park. The strategy for managing Natural Areas is based on adaptive management, so the SFRPD may incorporate any relevant measures into the NRMP in the future. Policy conflicts do not, in and of themselves, indicate a significant environmental effect within the meaning of CEQA, in that the intent of CEQA is to determine physical effects associated with a project. To the extent that physical environmental impacts of a proposed project may result from conflicts with one of the policies related to a specific resource topic, such physical impacts are adequately analyzed in the EIR within each topic section as required under CEQA.

Issue 13: The Wild Equity Appellant asserts that the EIR included an inappropriate threshold of significance of the physical degradation of existing recreational resources.

Response 13: The Planning Department, as the Lead Agency, is responsible for determining the thresholds of significance for its environmental review documents. The significance threshold of the physical degradation of the existing recreational resources is in the City's Initial Study Checklist and the Planning Department appropriately included it as a significance threshold in the EIR.

The Wild Equity Appellant claims that the Planning Department inappropriately included the significance threshold "Would the project physically degrade existing recreational resources?" to the Initial Study and that this significance threshold is inappropriate as it is not in Appendix G of the CEQA Guidelines.

Lead Agencies are responsible for determining the thresholds of significance for all documents they prepare. They can rely on several sources, including Appendix G of the CEQA Guidelines. An impact can be significant even if it is not covered by an Appendix G question. While Appendix G is the most common source, Lead Agencies are not required to use it and are free to develop their own thresholds.

San Francisco Administrative Code Section 31.10 directs the Planning Department's initial study to include, "an identification of the environmental effects of a project using as its base the environmental checklist form set forth in Appendix G of the CEQA Guidelines and addressing each of the questions from the checklist form that are relevant to a project's environmental effects; provided that the checklist form shall be supplemented to address ... other environmental effects specific to the urban environment of San Francisco or to the specific project."

The Planning Department, as the Lead Agency, has consistently included the significance threshold "Would the project physically degrade existing recreational resources?" in the City's standard Initial Study Checklist and applied this significance threshold in the NRMP EIR.

The NRMP EIR evaluated the impact of the Laguna Salada Restoration Project on the existing Sharp Park Golf Course recreation facility. The Laguna Salada Restoration Project would involve the construction of a habitat corridor between Horse Stable Pond and Laguna Salada, requiring Hole 12 to be closed. Removing a hole would affect the playability of the 18-hole course, significantly affecting this recreation facility. However, with implementation of M-RE-6, which calls for retaining the golf course as an 18-hole course, this impact would be reduced to less than significant. The Appellant provides no evidence that the EIR analysis was inadequate.

CONCLUSION:

The Appellants have not raised any new issues relative to the project's physical environmental impacts that were not previously addressed in the Draft EIR and/or in the Responses to Comments document or at the EIR certification hearing, and as discussed above, the analysis and conclusions of the Final EIR are supported by substantial evidence in the record. Moreover, Appellants have not provided substantial evidence in support of their own arguments regarding the adequacy and accuracy of the Final EIR. Argument and speculation alone are not substantial evidence under CEQA. Even if the Appellants had provided substantial evidence that contradicts the analysis and conclusions of the Final EIR, the agency's adequacy determination remains valid when the EIR is based on substantial evidence in the record. The Final EIR and supporting documents provide such substantial evidence.

For the reasons stated above, the Planning Commission's certification of the EIR complies with the requirements of CEQA, the CEQA Guidelines, and Chapter 31 of the San Francisco Administrative Code. The Department, therefore, recommends that the Board uphold the Commission's decision to certify the EIR and deny the appeal.

Carroll, John (BOS)

From: BOS Legislation, (BOS)
Sent: Monday, February 27, 2017 11:41 AM
To: bplatr@wildequity.org; desai@npca.org; ggas@goldengateaudubon.org; office@sequoia-audubon.org; kerry@savethefrogs.com; deesel91@gmail.com; SFForestNews@gmail.com; tom@intrinsicdevices.com; bo@slotelaw.com; richard@sfpulicgolf.org; Julia4th@yahoo.com; Bradley, Stacy (REC)
Cc: Givner, Jon (CAT); Stacy, Kate (CAT); Byrne, Marlena (CAT); Rahaim, John (CPC); Sanchez, Scott (CPC); Gibson, Lisa (CPC); Starr, Aaron (CPC); Rodgers, AnMarie (CPC); Hue, Melinda (CPC); Ionin, Jonas (CPC); BOS-Supervisors; BOS-Legislative Aides; Calvillo, Angela (BOS); Somera, Alisa (BOS); Lew, Lisa (BOS); Carroll, John (BOS); BOS Legislation, (BOS)
Subject: SF Forest Alliance Letter: Appeal of CEQA Certification of Final Environmental Impact Report - Natural Resources Management Plan - Appeal Hearing on February 28, 2017
Categories: 170044

Good morning,

Please find linked below an additional document received by the Office of the Clerk of the Board from the SF Forest Alliance, concerning the CEQA Certification of Final Environmental Impact Report Appeal for the proposed Natural Resources Management Plan:

[SF Forest Alliance Letter - Received February 27, 2017](#)

The appeal hearing for this matter is scheduled for a 3:00 p.m. special order before the Board tomorrow, February 28, 2017.

I invite you to review the entire matter on our [Legislative Research Center](#) by following the link below:

[Board of Supervisors File No. 170044](#)

Regards,

John Carroll
Legislative Clerk
Board of Supervisors
San Francisco City Hall, Room 244
San Francisco, CA 94102
(415)554-4445 - Direct | (415)554-5163 - Fax
john.carroll@sfgov.org | bos.legislation@sfgov.org

 Click [here](#) to complete a Board of Supervisors Customer Service Satisfaction form.

The [Legislative Research Center](#) provides 24-hour access to Board of Supervisors legislation and archived matters since August 1998.

Disclosures: Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information provided will not be redacted. Members of the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors website or in other public documents that members of the public may inspect or copy.

To: San Francisco Board of Supervisors
2 copies delivered to each supervisor's office by 3 pm 2/24/17

From: San Francisco Forest Alliance
Dee Seligman, Interim President
Rupa Bose, Vice President
Tom Borden, Director

RECEIVED AFTER THE ELEVEN-DAY
DEADLINE, BY NOON, PURSUANT TO ADMIN. CODE, SECTION 31.16(b)(5)
(Note: Pursuant to California Government Code, Section 85009(b)(2), information received at, or prior to, the public hearing will be included as part of the official file.)

RECEIVED
BOARD OF SUPERVISORS
SAN FRANCISCO
2017 FEB 27 AM 10:44
JL

Subject: SF Planning Department memo dated February 17, 2017 titled
Appeal of the Final Environmental Impact Report EIR for the Natural Resources Management
Plan

The Planning Department issued a rebuttal of our arguments dated February 17. They fail to respond to many of the issues we raise and ignore the facts we presented to support our arguments. In many of their arguments, they cite statements in the EIR as if they were requirements of the SNRAMP. Only what is in the SNRAMP and in the Recreation and Parks Commission plan adoption documents define how the plan must/will be implemented. We will not waste time discussing what the EIR says in instances where the issue is intent of the SNRAMP.

CEQA Process Violations

Planning fails to address the violation of CEQA process we identify, that the RTC added significant new information to the DEIR. CEQA requires that the document be circulated again for "consultation" when such significant new information is added. Planning failed to do so. See the SF Forest Alliance document, section 4 for a discussion of this. In the rest of this document, we will reference relevant information in the SF Forest Alliance main appeal document as (SFFA 4) for example.

Planning Memo page 9, EIR Certification

The Errata, was added to the EIR package and transmitted to the Planning Commission on December 15, 2016, the date of the certification hearing. This is obviously 10 days too late to be considered as part of the EIR being certified that day.

Below we respond to Planning using their numbering system.

1) Tree Replacement

Planning's argument - The SNRAMP commits to replant trees removed from the project area will be replaced within the project area on a one-to-one basis.

They cite an August 24, 2011 memo from RPD that was added as part of an appendix to the DEIR a week before it was released. The memo says trees will be replaced at a "ratio of roughly one-to-one". It does not state the replacement trees will be planted in the project area. This memo is not directly mentioned anywhere in the EIR. Section III.E of the DEIR, page 84, is the only reference to appendix J in the EIR. It says,

"During the development of this EIR, the SFRPD has modified management activities to address evolving management concerns and changes in conditions at the Natural Areas; **these modifications are summarized in Section III.G; a memorandum documenting these modifications will be appended to the final draft SNRAMP** and is included in Appendix J. The final SNRAMP will also incorporate the mitigation measures identified in this EIR."

Section III.G makes no mention of the purported 1:1 tree replacement policy, while it does list many other less significant issues. Further, the tree replacement policy was never appended to the final

draft SNRAMP. The version of the SNRAMP adopted by the Rec. Park Commission on December 15, 2016 did not include the modifications.

Planning also references a memo written by Lisa Wayne to show that the NAP intends to replant trees on a 1:1 basis. Wayne presents some vague statements and a lot of extraneous data on plants grown in the native plant nursery. She could easily have made a clear statement that the intent of the Plan is to replant trees on a 1:1 basis within the Natural Areas. She did not. This memo is not part of the SNRAMP.

The SNRAMP which is the subject of this EIR and was adopted by the Rec. Park Commission does not commit to replace trees on a 1:1 basis within the project area. The EIR needs to specify a mitigation measure that trees removed from the project area will be replaced in the project area on at least a 1:1 basis. The measure would require that an accounting system be established to track trees removed and trees planted. The system should record the size, type, location, date and reason for removal and the size, type, date and location of trees planted. This can be easily accomplished using simple cell phone apps. The Urban Forestry Council recommends replanting at a 3:1 ratio and greenhouse gas concerns would push this even higher. See the SF Forest Alliance(SFFA) document section 2.2.

1) Tree Removal

Planning's argument – The intent of the SNRAMP is to remove unhealthy, damaged and dangerous trees, not healthy trees.

In the full set of arguments we presented to the BOS, section 2.4, we cite multiple references from the SNRAMP that show the primary intent of tree removal is to create more open space for grasses and scrub. We provided tree removal maps used by the drafters of the SNRAMP to calculate the number of trees to be removed from each management area. The maps clearly show trees are targeted based on the areas they want to open up for grassland/scrub. Further, below is a table from the SNRAMP that enumerates the trees to be removed from each area.

Table 5
Summary of Natural Areas Management Plan

Natural Area Site	Park Acreage	Management Area (acres)			Invasive Trees			Trails (feet)			Dog Play Areas (acres)						
		Natural Area Acreage	MA-1	MA-2	MA-3	Total MA ¹	Existing	To Remove	To Remain	Existing	To Close or Relocate	To Create	Resulting	Existing	To Remove	To Remain	Monitor ²
Balboa	1.8	1.8	1.1	0.7	0	1.8	0	0	0	637	50	0	547				
Bayview Park	43.9	43.9	8.2	15.8	19.7	43.7	6,000	511	5,489	8,486	1,439	1,020	8,077				
Bernal Hill	24.3	24.3	7.6	5.8	10.7	24.1	100	0	100	12,239	4,544	464	8,159	21.0	6.0	15.0	No
Billy Goat Hill	3.5	3.5	0.6	1.1	1.6	3.3	20	0	20	2,800	745	0	1,855				
Brooks Park	3.5	2.0	0.8	0.9	0.3	2.0	20	3	17	1,340	436	0	884				
Buena Vista Park	36.1	6.1	0	6.1	0	6.1	140	10	130	3,741	0	0	3,741	1.0	0	1.0	Yes
Corona Heights	12.6	9.6	2.8	2.5	4.2	9.6	200	15	185	6,701	1,845	0	4,955	0.4	0	0.4	No
Dorothy Erskine Park	1.5	1.5	0.2	0.3	1.0	1.5	100	14	86	771	0	0	771				
Duncan-Castro	0.5	0.5	0.3	0.1	0.1	0.5	0	0	0	333	0	0	333				
Edgehill Mountain	2.3	2.3	0	0.9	1.4	2.3	300	0	300	747	0	436	1,185				
Everson/Digby	1.2	1.2	0.8	0.1	0.2	1.2	0	0	0	0	0	0	0				
Fairmount Park	0.7	0.7	0	0	0.7	0.7	100	0	100	187	0	0	187				
Glen Canyon Park and O'Shaughnessy Hollow	72.6	63.8	9.1	33.0	22.4	63.5	6,000	120	5,380	23,242	3,653	0	19,589				
Golden Gate Heights	6.0	6.0	0.2	0.5	0.1	6.0	30	0	30	559	390	168	357				
Golden Gate Park Oak Woodlands	1,021.0	26.2	0.7	25.5	0	26.2	900	82	818	24,844	12,391	0	12,463	2.8	0	2.8	Yes
Grandview Park	4.0	4.0	0.9	2.4	0.7	4.0	25	5	20	1,722	409	0	1,313				
Hawk Hill	4.5	4.5	1.4	3.0	0	4.4	10	0	10	1,609	692	0	917				
India Basin Shoreline Park	11.8	6.2	3.2	2.8	0	6.0	0	0	0	1,885	0	0	1,885				
Interior Greenbelt	19.4	16.5	0	1.8	14.7	16.5	5,800	140	5,680	935	0	620	1,555				
Kite Hill	2.7	2.7	0.6	0.5	1.6	2.7	10	0	10	1,957	398	0	1,559				
Lake Merced	614.0	395.0	60.8	101.8	231.5	394.1	12,000	134	11,866	11,106	3,319	365	8,152	5.0	5.0	0	
Lakeview/Ashton Mini Park	0.5	0.5	0.1	0.2	0.2	0.5	0	0	0	651	0	0	651				
McLaren Park	312.6	185.3	34.9	63.3	61.4	164.6	19,800	809	18,691	59,185	15,681	0	43,504	61.7	8.3	53.4	Yes
Mount Davidson	40.2	40.2	8.6	11.0	20.1	39.9	11,000	1,600	9,400	15,456	2,967	0	12,589				
Palou-Phelps	2.5	2.1	0.8	0.4	0.8	2.0	40	2	38	1,049	527	498	1,019				
Pine Lake	30.3	8.4	1.0	3.8	3.8	8.4	1,000	0	1,000	3,157	608	13	2,562	3.3	0	3.3	No
Rock Outcrop	1.6	1.6	0.8	0.7	0	1.5	0	0	0	0	0	0	0				
Tank Hill	2.9	2.9	1.5	0.6	0.7	2.8	50	0	50	2,672	1,411	0	1,261				
Twin Peaks	34.1	31.1	12.6	14.3	3.8	30.7	88	3	85	8,741	2,303	501	6,939				
15th Avenue Steps	0.3	0.3	0	0.2	0	0.2	0	0	0	0	0	0	0				
San Francisco Subtotal	2,312.9	869.5	159.0	305.1	401.5	865.6	53,433	3,448	59,985	196,562	53,758	4,105	146,909	95.2	19.3	75.9	
Sharp Park (Pacific)	411.0	237.2	35.0	125.1	76.6	236.6	54,000	15,000	39,000	14,741	653	1,792	15,860				
Total	2,723.9	1,106.7	194.0	430.2	478.0	1,102.2	117,433	18,448	98,985	211,303	54,411	5,897	162,789	95.2	19.3	75.9	

The condition of the trees has nothing to do with the number of trees the SNRAMP plans to remove from each area.

Planning makes a dangerous statement on their page 12.

"RPD staff could remove seedlings or saplings that have a DBH of 6 inches or less (or a height of 15 feet or less), but the SFRPF arborist would be consulted in the evaluation of the removal of trees."

This seems to be an attempt to broaden the definition of a Sapling which RPD can cut freely without counting it as a tree. The SNRAMP defines a Sapling based strictly on height. The 6" DBH measurement has nothing to do with whether a tree is small enough to be considered a Sapling. NAP staff are allowed to cut down trees smaller than 6" DBH. However, if they are taller than 15 feet, they must be counted as trees. They must call in the arborist to have that staff cut down larger trees.

1) forest management objectives

This is just a repetition of the two arguments above.

2) Environmental justice

Planning's Argument - Tree removals and trail closures are not unfair to disadvantaged neighborhoods in SE San Francisco.

Our City's SE neighborhoods need trees. The SNRAMP plans significant tree removals from Bayview Hill and McLaren Park. The SFFA argument they refer to is that even if a mitigation measure is added requiring 1:1 tree replacement, these neighborhoods will suffer if trees are removed in these parks and the replacements planted on other natural areas across town.

Under the SNRAMP the SE neighborhoods will lose access to a huge portion of their parkland. As they did in the EIR, Planning continues to obscure the fact that the SNRAMP will make access to Natural Areas on-trail only. The other 95% of the Plan areas are to be off limits to the public. We discuss this extensively in our documents and present maps illustrating what areas of our parks we will be allowed to enter. See section 1 of the SFFA document. The impact for the disadvantaged SE neighborhoods is more severe than for other parts of the City because half of McLaren Park and all of Bayview Hill (except for the road) are subject to the SNRAMP. The SNRAMP takes these parklands away from the people. This is a huge impact on the recreation which is an environmental effect required to be analyzed under CEQA.

Planning presents the changes in trails under the SNRAMP as a red herring to divert attention from the issue we raised, which is the restricting the public to designated trails and prohibiting them from entering the parks at large. We have been perfectly clear this is the heart of the access issue. **The fact that Planning does not respond to it makes it perfectly clear they are trying to hide this intent of the SNRAMP.**

3) trail closures

Planning's argument - only RPD's GIS experts can look at the SNRAMP maps and measure the lengths of trails closed. Trails the SNRAMP drafters thought to be significant enough to be included on the maps and included in the tabulations of Natural Areas trails are not relevant to this discussion.

The SNRAMP plans to close 22% of our trails. That is already a major impact on recreation. The NAP has actually closed over 50% of the trails in areas where they have implemented their "trail improvement" and "Urban Trails" programs. This is not "alternative" data. This is factual information based on the maps contained in the SNRAMP with the trail lengths measured using a CAD (computer aided design) program. You can see in the table presented by SFFA (SFFA 5) that our tally of initial trails, and trails planned to be closed under the SNRAMP are in close agreement, i.e., our re-measurement of the SNRAMP maps is accurate. We are not counting any trails except those recognized in the SNRAMP. The actual maps are presented in our Appendix F.

4) Will implementing the Plan require additional herbicide use?

Planning's argument - Herbicide use by the NAP will continue as it has for existing activities. Tree removals are spread over 20 years so repeated Tier 1 herbicide applications to the tree stumps will not require herbicide.

The EIR claims herbicide use by the NAP will not increase with implementation of the SNRAMP, in other words, that the SNRAMP does not require the use of herbicide. This cannot be correct. (SFFA 3) We do not have to argue that the actual herbicide use required by the SNRAMP will have a significant environmental impact. The issue here is that the drafters of the EIR falsely claim that the Plan will not require additional herbicide use and thereby, avoid having to make a good faith effort to assess the impact of the herbicide use.

5) Does the NAP actually intend to install much more fencing than the SNRAMP discloses and the EIR analyzes?

Planning's argument - the fences installed to date do not have a negative impact on aesthetics and they were installed for public safety and to keep people from going off trail and walking on the plants.

The fences installed to date by the NAP to close trails and to confine people to on-trail use only are certainly much more extensive than what is disclosed in the SNRAMP. (SFFA 9 & Appendix F) The data

we present differentiates between fences installed for public safety and fences installed for public access control. Virtually all of it is to prevent the public from accessing parkland. It has nothing to do with public safety. Go take a look at Glen Canyon. One short length of fence on the west side of the creek was installed to prevent people from falling off the edge of the retaining wall. The rest is all to prevent the public from accessing parkland. There is one narrow trail with precipitous drops off a rocky bluff. No fence was installed there, even though it is the most dangerous trail in the entire park. (We do not want a fence there.)

The large quantity of fencing installed to date demonstrates the actual intent of the SNRAMP. The fences are an un-natural blight on our natural landscapes.

6) BOS 653-02

Planning's Argument – The resolution does not prohibit the Rec Park Commission from adopting the SNRAMP.

Our point in citing the resolution is that it forbade RPD from implementing the natural areas Plan until the Plan was approved and it defined what actions by RPD would constitute implementation of the Plan. (SFFA 7)

7) Implementing the SNRAMP in advance of certification of its EIR

Planning's argument – Anything the NAP did from 2015 until December 15, 2016 was in accordance with the 1995 Management Plan or was part of another project independent from the SNRAMP.

Planning claims the trail closures in Glen Canyon were independent of the SNRAMP. They were not independent. The trail closures were selected by the NAP and many of them were closures intended to be executed under the SNRAMP. Planning does not address the trail closures in other parks which are part of the SNRAMP and were executed by the NAP before December 15, 2016. The same goes for the access control fences. (SFFA 7)

The NAP did indeed install signs in January and February 2015 in virtually all Natural Areas restricting the public to on trail use only and prohibiting bicycles. Previously the public was free to access all Natural Areas. (SFFA 1) People with bicycles were allowed to access all Natural Areas. (SFFA 8) This is a major impact on Recreation and it was implemented before Certification.

Planning repeats the false claim that the Glen Canyon trail from O'Shaughnessy to Silver Tree was closed prior to the start of the EIR process. (SFFA 10E)

8) Greenhouse Gas (GHG) Emissions

Planning's argument – nobody will spend the time to try to wade through this. It looks official.

Statement of issue, page 19 SFFA did not argue the GHG emissions from cutting down saplings would be significant. We argued that the lost future sequestration would be significant, and vastly more important than any replacement trees that might possibly be planted.

Planning claims if they say their GHG calculations are right and we say they are wrong, this is a "disagreement among experts" and there is no basis for rejecting the EIR certification. This is not a disagreement among experts. The calculations are just plain wrong. They cite methods developed by experts, but then use the methods incorrectly. You do not need to be an expert to see what they are doing is wrong. You just have to take the time to look at what they did. Please read sections 2.3 of the SFFA paper.