

File No. 140413

Committee Item No. 2

Board Item No. 44

COMMITTEE/BOARD OF SUPERVISORS

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Committee: Land Use and Economic Development Date June 16, 2014

Board of Supervisors Meeting

Date 7/15/14

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Completed by: Andrea Ausberry Date June 12, 2014

Completed by: AA Date 6.19.14

1 [General Plan - Amendments Related to the 2014 Update of the Recreation and Open Space
2 Element]

3 **Ordinance amending the General Plan by updating the Recreational and Open Space**
4 **Element of the General Plan; and making findings, including environmental findings,**
5 **and findings of consistency with the General Plan, and the eight priority policies of**
6 **Planning Code, Section 101.1.**

7 Note: Additions are single-underline italics Times New Roman;
8 deletions are ~~strikethrough italics Times New Roman~~.
9 Board amendment additions are double underlined.
Board amendment deletions are ~~strikethrough normal~~.

10 Be it ordained by the People of the City and County of San Francisco:

11 Section 1. Findings.

12 A. Section 4.105 of the Charter of the City and County of San Francisco provides
13 that the Planning Commission shall periodically recommend to the Board of Supervisors, for
14 approval or rejection, proposed amendments to the General Plan.

15 B. On April 23, 2014, the Board of Supervisors received from the Planning
16 Department a proposed General Plan amendment which updates the Recreational and Open
17 Space Element ("ROSE") of the San Francisco General Plan.

18 C. Section 4.105 of the City Charter further provides that if the Board of
19 Supervisors fails to Act within 90 days of receipt of the proposed Housing Element Update
20 Amendment, then the proposed amendment shall be deemed approved.

21 D. San Francisco Planning Code Section 340 provides that an amendment to the
22 General Plan may be initiated by a resolution of intention by the Planning Commission, which
23 refers to, and incorporates by reference, the proposed General Plan amendment. Section
24 340 further provides that Planning Commission shall adopt the proposed General Plan
25

1 amendment after a public hearing if it finds from the facts presented that the public necessity,
2 convenience and general welfare require the proposed amendment or any part thereof. If
3 adopted by the Commission in whole or in part, the proposed amendment shall be presented
4 to the Board of Supervisors, which may approve or reject the amendment by a majority vote.

5 E. On January 9, 2014, the Planning Commission initiated the adoption of the
6 ROSE update, as an amendment to the General Plan, at a duly noticed public hearing.

7 F. On April 3, 2014, at a duly noticed public meeting, the Planning Commission
8 reviewed and considered the Final Negative Declaration (FND) prepared for the ROSE
9 update, and found that the contents of said FND and the procedures through which the FND
10 was prepared, publicized, and reviewed complied with the California Environmental Quality
11 Act (California Public Resources Code Sections 21000 et seq.) (CEQA), 14 California Code of
12 Regulations Sections 15000 et seq. (the "CEQA Guidelines") and Chapter 31 of the San
13 Francisco Administrative Code ("Chapter 31"). A copy of the FND is on file with the Clerk of
14 the Board in File No. 140413.

15 G. The project evaluated in the FND is the ROSE update. The ROSE update is an
16 action proposed by the Planning Department that is within the scope of the project evaluated
17 in the FND.

18 H. At the same hearing during which the Planning Commission reviewed,
19 considered and adopted the FND, the Planning Commission adopted CEQA Findings with
20 respect to the approval of the proposed ROSE update, in Resolution 19114, finding that the
21 public necessity, convenience and general welfare required the proposed amendment. The
22 letter from the Planning Department transmitting the proposed ROSE update to the Board of
23 Supervisors, the FND, the CEQA Findings adopted by the Planning Commission with respect
24 to the approval of the ROSE update, the ROSE update and the Resolution approving the
25 ROSE update are on file with the Clerk of the Board in File No 140413. These and any and

1 all other documents referenced in this Ordinance have been made available to, and have
2 been reviewed by, the Board of Supervisors, and may be found in either the files of the City
3 Planning Department, as the custodian of records, at 1650 Mission Street in San Francisco, or
4 in Board File No. 140413 with the Clerk of the Board of Supervisors at 1 Dr. Carlton B.
5 Goodlett Place, San Francisco and incorporated herein by reference.

6 I. The Board of Supervisors has reviewed and considered the FND and the
7 environmental documents on file referred to herein. The Board of Supervisors has reviewed
8 and considered the CEQA Findings adopted by the Planning Commission in support of the
9 approval of the ROSE update, and hereby adopts as its own and incorporates the CEQA
10 Findings contained in Planning Commission Resolution 19114 by reference as though such
11 findings were fully set forth in this Ordinance.

12 J. The Board of Supervisors finds that since the FND was finalized, there have
13 been no substantial project changes and no substantial changes in project circumstances that
14 would require major revisions to the FND due to the involvement of new significant
15 environmental effects or an increase in the severity of previously identified significant impacts,
16 and there is no new information of substantial importance that would change the conclusions
17 set forth in the FND.

18 K. The Board of Supervisors finds, pursuant to Planning Code Section 340, that the
19 ROSE update set forth in the documents on file with the Clerk of the Board in File No.140413
20 will serve the public necessity, convenience and general welfare for the reasons set forth in
21 Planning Commission Resolution No. 19114 and incorporates those reasons herein by
22 reference.

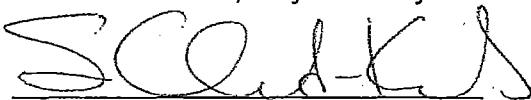
23 L. The Board of Supervisors finds that the ROSE update as set forth in the
24 documents on file with the Clerk of the Board in Board File No. 140413, is in conformity with
25 the General Plan and the eight priority policies of Planning Code Section 101.1 for the

1 reasons set forth in Planning Commission Resolution No. 19114. The Board hereby adopts
2 the findings set forth in Planning Commission Resolution No. 19114 and incorporates those
3 findings herein by reference.

4 M. Nothing in this Recreation and Open Space Element shall constitute approval of
5 any particular project. Each project will need to go through the normal approval process. The
6 Board of Supervisors restates its policy that open space management and development shall
7 take into account the needs for all types of recreation, access by the public to diverse open
8 spaces, and biodiversity.

9 Section 2. The Board of Supervisors hereby amends the San Francisco General Plan
10 by adopting the 2014 ROSE update, as recommended to the Board of Supervisors by the
11 Planning Commission on April 3, 2014, and referred to above.

12
13
14 APPROVED AS TO FORM:
15 DENNIS J. HERRERA, City Attorney

16 By: 
17 for Andrea Ruiz-Esquide
18 Deputy City Attorney

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25

LEGISLATIVE DIGEST

[General Plan – Amendments Related to the 2014 Update of the Recreation and Open Space Element]

Ordinance amending the San Francisco General Plan by adding the Glen Park Area Plan; and making findings, including environmental findings and findings of consistency with the General Plan and the Priority Policies of Planning Code Section 101.1.

Existing Law

The General Plan of the City and County of San Francisco is a planning document that sets a strategic and long term vision for the City. State law requires that the General Plan address seven issues: land use, circulation, housing, conservation, open space, noise and safety. In addition, a general plan can also contain area plans, which cover specific geographic areas of a city.

Amendments to Current Law

This Ordinance would amend the Recreation and Open Space Element (ROSE) of the General Plan. The ROSE is a policy document that consists in general objectives and policies to guide comprehensive long-term planning, conservation and use of open space and recreational facilities.

Background Information

San Francisco last updated the ROSE in 1986.

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SAN FRANCISCO PLANNING DEPARTMENT

April 10, 2014

Ms. Angela Calvillo, Clerk
Board of Supervisors
City and County of San Francisco
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Re: Transmittal of Planning Department Case Number 2011.0641M;
Proposed Ordinances adopting amendments to the San Francisco General Plan,
to update the Recreational and Open Space Element ("ROSE")
BOS File No: 140413 (pending)

Planning Commission Recommendation: Approval

Dear Ms. Calvillo,

On January 9th, 2014 the San Francisco Planning Commission (hereinafter "Commission") conducted a duly noticed public hearing at a regularly scheduled meeting to consider the initiation of a proposed Ordinance adopting the San Francisco General Plan amendments related to the Recreation and Open Space Element ("ROSE").

On April 3rd, 2014 the Commission conducted a duly noticed public hearing at a regularly scheduled meeting to consider adoption of the proposed Resolution and voted to recommend approval.

The attached resolutions and exhibits provide more detail about the Commission's action, including the proposed 2014 Recreation and Open Space Element Update. If you have any questions or require further information please do not hesitate to contact me or project manager, Susan Exline at (415) 558-6332 or at susan.exline@sfgov.org.

Sincerely,

John Kahaim
Director of Planning

Cc via electronic transmittal: City Attorneys John Givner and Andrea Ruiz-Esqvide; Assistant Clerk Andrea Ausberry

Transmittal Materials

**CASE NO. 2010.0641M
General Plan Amendments Related to
the Recreation and Open Space Element**

Attachments (One copy of the following):

Planning Commission Resolution No. 19114

Planning Commission Executive Summary for Case No. 2010.0641M- March 13th
Recreation and Open Space Element

Public comments and Department Response to comments

Planning Commission Executive Case No. 2010.0641M-March 27th

Negative Declaration

Legislative Digest

Draft Ordinance: General Plan Amendments related to the Recreation and Open Space Element

SAN FRANCISCO
PLANNING COMMISSION
RESOLUTION NO. 19114

ADOPTING AMENDMENTS TO THE SAN FRANCISCO GENERAL PLAN, TO UPDATE THE RECREATIONAL AND OPEN SPACE ELEMENT ("ROSE"); MAKING FINDINGS, INCLUDING FINDINGS OF CONSISTENCY WITH THE GENERAL PLAN, PRIORITY POLICIES OF PLANNING CODE SECTION 101; AND FINDINGS UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT.

WHEREAS, Section 4.105 of the Charter of the City and County of San Francisco mandates that the Planning Commission shall periodically recommend to the Board of Supervisors for approval or rejection proposed amendments to the General Plan.

The Planning Department, in cooperation with the Recreation and Parks Department and in consultation with other City agencies, developed an update to the Recreation and Open Space Element of the General Plan, hereinafter the Element, through a comprehensive community-based planning effort. Beginning with the establishment of an Open Space Task Force in November 2007, the Department worked closely with community leaders, stakeholders, City agencies, and community members across numerous fora to develop open space goals, policies and objectives for the update. The proposed General Plan Amendment of the Element was developed from feedback received through those fora. Staff recommends adoption of the draft Resolution to initiate proposed amendments to the General Plan.

Planning Code Section 101.1(b) establishes eight priority policies and is the basis by which differences between competing policies in the General Plan are resolved. The project is consistent with the eight priority policies, in that:

1. That existing neighborhood serving retail uses be preserved and enhanced and future opportunities for resident employment in or ownership of such businesses enhanced.

The Element calls for the expansion and improvement of the City's open space network and its recreational opportunities. Numerous studies have illustrated that open space opportunities make an area more attractive for investment, by attracting and expanding local businesses, by increasing tourism and by enhancing property values.

2. That existing housing and neighborhood character be conserved and protected in order to preserve the cultural and economic diversity of our neighborhoods.

The Element includes objectives and policies that support the improvement of the City's parks, streets and public spaces, in accordance with the needs of their surrounding neighborhoods. It states that new acquisitions should be designed with their neighborhood populations in mind, and that existing spaces should be redesigned to better serve the needs of their neighborhoods, while ensuring that the spaces are flexible to adapt to changing neighborhood needs. It also promotes the development of cultural programming and activities in open spaces.

3. That the City's supply of affordable housing be preserved and enhanced.

The Element will not affect the City's supply of affordable housing. It does however prioritize the acquisition of new space and renovation of existing space in "high needs" areas, where the City's low-income and minority populations tend to be concentrated,

and therefore will support the existence of affordable housing with open space and recreational opportunities.

4. That commuter traffic not impede MUNI transit service or overburden our streets or neighborhood parking.

The Element will not increase commuter traffic, and it encourages alternative modes of transportation – transit, bicycle and pedestrian access—to and from open spaces.

5. That a diverse economic base be maintained by protecting our industrial and service sectors from displacement due to commercial office development, and that future opportunities for resident employment and ownership in these sectors be enhanced.

The Element would not adversely affect the industrial or service sectors.

6. That the City achieves the greatest possible preparedness to protect against injury and loss of life in an earthquake.

The Element would not adversely affect the City's preparedness in the face of an earthquake. It supports recycling and reuse of water, as well as water conservation, which will assist in the event of water shortages caused by an earthquake.

7. That landmarks and historic buildings be preserved.

The Element would not have a negative effect on the preservation of landmarks and historic buildings.

8. That our parks and open space and their access to sunlight and vistas be protected from development.

The Element contains policies to preserve sunlight in public open space and preserves Planning Code regulations which prohibit the construction of buildings which cast shadow on Recreation and Park Department spaces.

The development of the Recreation and Open Space Element Update was coordinated with existing General Plan policies. Analysis of applicable General Plan Objectives and Policies has determined that the proposed action is, on balance, consistent with the General Plan as it is proposed to be amended. The proposed revisions support many concepts outlined in the General Plan. Below are specific policies and objectives that support the proposed actions.

NOTE: General Plan Elements are in *CAPITAL ITALICS*
General Plan Objectives are in *CAPITAL LETTERS*
General Plan Policies are in Arial standard font

TRANSPORTATION ELEMENT

POLICY 24.5 Where consistent with transportation needs, transform streets and alleys into neighborhood-serving open spaces...

OBJECTIVE 26 CONSIDER THE SIDEWALK AREA AS AN IMPORTANT ELEMENT IN THE CITYWIDE OPEN SPACE SYSTEM.

POLICY 26.1 Retain streets and alleys not required for traffic...

POLICY 26.2 Close certain streets not required as traffic carriers for pedestrian use...

POLICY 26.3 Establish frequent and convenient transit service, including water-based transit, to major recreational facilities...

POLICY 27.9 Identify and expand recreational bicycling opportunities.

The Recreation and Open Space Element recognizes living streets, living alleys and streetscape improvements as an important supplement to traditional open space. It contains policies that call for improving access and connectivity to open space which includes transit, bicycling and pedestrian access.

URBAN DESIGN ELEMENT

- POLICY 1.4 Protect and promote large-scale landscaping and open space that define districts and topography.
- POLICY 2.2 Limit improvements in other open spaces having an established sense of nature to those that are necessary...
- POLICY 3.4 Promote building forms that will respect and improve the integrity of open spaces and other public areas.
- POLICY 4.8 Provide convenient access to a variety of recreation opportunities.
- POLICY 4.9 Maximize the use of recreation areas for recreational purposes.
- POLICY 4.10 Encourage or require the provision of recreation space in private development.
- POLICY 4.11 Make use of street space and other unused public areas for recreation...

The Recreation and Open Space Element update emphasizes the need to preserve open space and specifies criteria for any encroachment from other uses. Such criteria assure a no loss of quantity and quality of open space. The Recreation and Open Space Element also recognizes the role of private open space in private developments and establishes that such private open space should be of high quality.

ENVIRONMENTAL PROTECTION ELEMENT

- POLICY 7.1 Preserve and add to public open space...

The Recreation and Open Space Element Update focuses both on preserving existing open space, ensuring dynamic and flexible use of our existing open space, as well as acquiring new open spaces especially in areas of the city identified with high needs for open space.

BALBOA PARK AREA PLAN

- POLICY 5.1 Create A System Of Public Parks, Plazas And Open Spaces In The Plan Area.
- POLICY 5.2 Create Open Space Within New Development That Contributes To The Open Space System
- POLICY 5.4 Create An Space System That Both Beautifies The Neighborhood And Strengthens The Environment.

The Recreation and Open Space Element Update defines the open space system in the city as to include traditional parks as well as urban plazas and living streets. It also includes policies that highlight the need for environmentally sustainable design when constructing new open space or renovating existing ones.

BAYVIEW HUNTERS POINT AREA PLAN

- POLICY 12.1 Make better use of existing recreation facilities.
- POLICY 12.2 Maximize joint use of recreation and education facilities.
- POLICY 12.3 Renovate and expand Bayview's parks and recreation facilities, as needed.

The Recreation and Open Space Element Update encourages dynamic and flexible use of existing open space recognizing the need to better utilize our existing open space resources. Other policies prioritize renovation of underutilized open spaces, support development of signature open space along the shoreline, and call for a region serving open space at Hunters Point Shipyard.

CENTRAL WATERFRONT, EAST SOMA (SOUTH OF MARKET), MISSION AND SHOWPLACE SQUARE/POTRERO HILL AREA PLAN

- POLICY 5.1 Provide Public Parks And Open Spaces That Meet The Needs Of Residents, Workers And Visitors.
- POLICY 5.2 Ensure That New Development Includes High Quality Private Open Space.

- POLICY 5.3 Create A Network Of Green Streets That Connects Open Spaces And Improves The Walkability, Aesthetics, And Ecological Sustainability Of The Neighborhood.
- POLICY 5.4 The Open Space System Should Both Beautify The Neighborhood And Strengthen The Environment.
- POLICY 5.5 Ensure That Existing Open Space, Recreation And Park Facilities Are Well Maintained.

The Recreation and Open Space Element Update responds to community needs and changing demographics when providing new open space or renovating or programming existing open space. It also contains policies on improving access and connectivity to open space and specifically creating a network of green connections that increases access to parks, open spaces, and the waterfront. Other policies highlight maintenance and repair of open space to modern standards in order to guarantee enjoyment of the open space.

CHINATOWN AREA PLAN

- POLICY 4.4 Expand open space opportunities.

The Element update contains policies to acquire new open space in high needs areas of the City which are areas with high population density, high density of seniors, children and youth, and low income population, and low access to open space, as well as growth areas in the city.

CIVIC CENTER

- POLICY 1.3 Design Civic Center buildings and open spaces to serve as public gathering places for ceremonial, cultural, recreational, and other community activities.

The Element specifically supports the development of civic serving open spaces, including a series of connected open spaces along a civic center "axis".

DOWNTOWN PLAN

- OBJECTIVE 9 PROVIDE QUALITY OPEN SPACE IN SUFFICIENT QUANTITY AND VARIETY TO MEET THE NEEDS OF DOWNTOWN WORKERS, RESIDENTS, AND VISITORS.

- POLICY 9.1 Require usable indoor and outdoor open space, accessible to the public, as part of new downtown development.
- POLICY 9.2 Provide different kinds of open space downtown.
- POLICY 9.3 Give priority to development of two categories of highly valued open space; sunlit plazas and parks.
- POLICY 9.4 Provide a variety of seating arrangements in open spaces throughout downtown.
- POLICY 9.15 Improve the usefulness of publicly owned rights-of-way as open space.
- OBJECTIVE 10 ASSURE THAT OPEN SPACES ARE ACCESSIBLE AND USABLE.
- POLICY 10.1 Develop an open space system that gives every person living and working downtown access to a sizable sunlit open space within convenient walking distance.
- POLICY 10.2 Encourage the creation of new open spaces that become a part of an interconnected pedestrian network.
- POLICY 10.3 Keep open space facilities available to the public.
- POLICY 10.4 Provide open space that is clearly visible and easily reached from the street or pedestrian way.
- POLICY 10.5 Address the need for human comfort in the design of open spaces by minimizing wind and maximizing sunshine.

The Recreation and Open Space Element highlights the need for open space in dense areas of the city especially in downtown and calls for measures to ensure such open spaces are accessible, usable and activated. Other policies in the Recreation and Open Space Element emphasize preserving sunlight in public open spaces as well as safety and security for the public in open spaces.

HUNTERS POINT AREA PLAN

OBJECTIVE 7 CREATE A WORLD CLASS SYSTEM OF OPEN SPACE THAT INCLUDES A SIGNIFICANT PORTION OF THE OVERALL HUNTERS POINT SHIPYARD, ENABLES IMPROVEMENTS THE SHORELINE ENHANCES ACCESS, PROVIDES A WIDE RANGE OF RECREATIONAL AND ECOLOGICAL RESTORATION OPPORTUNITIES, AND IS SEAMLESSLY INTEGRATED WITH THE EXISTING NEIGHBORHOOD.

POLICY 7.1 Provide a wide variety of types and scale of open space with a wide variety of recreational and conservation opportunities.

POLICY 7.2 Celebrate the history of the site, including the history of indigenous populations, by incorporating interpretive elements throughout the development.

The Element Update encourages dynamic and flexible use of existing open space recognizing the need to better utilize our existing open space resources. Other policies prioritize renovation of underutilized open spaces, support development of signature open space along the shoreline, and call for a region serving open space at Hunters Point Shipyard.

MARKET AND OCTAVIA AREA PLAN

POLICY 4.1.7 Introduce traffic-calming measures on residential alleys and consider making improvements to alleys with a residential character to create shared, multipurpose public space for the use of residents.

The Recreation and Open Space Element recognizes living streets, living alleys and streetscape improvements as an important supplement to traditional open space and it calls for creative solutions to transform such public right of ways into open space.

NORTHEASTERN WATERFRONT

POLICY 2.4 Promote the development of new maritime activities, public open space and public access improvements as part of major new development on piers.

POLICY 2.5 Emphasize water-related recreation, Bay-oriented commercial recreation and Bay-oriented public assembly uses in non-maritime development adjacent to, or over, the water.

The Element Update encourages development of signature open space along the shoreline and calls for dynamic and flexible use of existing open space recognizing the need to better utilize our existing open space resources.

RINCON HILL AREA PLAN

POLICY 4.1 Create a Variety of New Open Spaces and Community Facilities...

POLICY 4.2 Create a New Neighborhood Park to Serve the District

POLICY 4.3 Link the Area Via Pedestrian Improvements to Major Open Spaces...

POLICY 4.4 Ensure Adequate Sunlight and Minimize Wind and Shadow on Public Streets and Open Spaces

POLICY 4.6 Create an Inviting and Pleasant Mid-Block Pedestrian Corridor to the Waterfront

POLICY 4.7 Require Private Development to Contribute to the Creation, Maintenance, and Operations of Open Spaces and Community Facilities...

The Element Update contains policies to acquire new open space especially in areas of the city with high needs for open space. Other policies also stress connectivity between parks and improvements for access to parks. The Element also recognizes the funding challenges around maintenance of parks and encourages innovative funding mechanisms to maintain parks and open spaces.

VAN NESS AVENUE

POLICY 7.2 Provide Wind Protection and Sun Exposure in Open Space Areas

POLICY 7.3 Maintain Existing Open Space Requirements for Residential Use

The Element underscores the importance of requirements for private residential open space and further calls for ensuring such open space is developed at high quality. Preserving sunlight in open spaces is also specifically featured in the Element as a city policy.

WESTERN SHORELINE

- POLICY 2.2 Maintain the Landscaped Recreational Corridor to Link with Other Parks
POLICY 2.3 Provide for a Continuation of the Bicycle Trail
POLICY 2.4 Improve Public Access to Ocean Beach from Golden Gate Park
POLICY 2.5 Develop and Revise Golden Gate Park Plans to Improve Recreational Access in the Western Portion
OBJECTIVE 6 Maintain and Enhance the Recreational Use of the Ocean Beach Shoreline
OBJECTIVE 7 Preserve and Restore Sutro Heights Park
POLICY 8.1 Develop the Cliff House/Sutro Bath Area as a Nature-Oriented Shoreline Park

The Recreation and Open Space Element identifies Golden Gate Park as a valuable open space resource, and encourages further improvements to the park while preserving its beauty and landscape. Other policies emphasize the need for signature open spaces along the shoreline. The new policies also stress the need for improvements to accessing parks whether with transit or by bicycle or on foot.

WHEREAS, a Preliminary Negative Declaration (PND) for the Project was prepared and published for public review on February 19, 2014; and

WHEREAS, the PND was available for public comment until March 26, 2014; and

WHEREAS, on March 27, 2014, the Planning Commission reviewed and considered the Final Negative Declaration (FND) and found that the contents of said report and the procedures through which the FND was prepared, publicized, and reviewed complied with the California Environmental Quality Act (California Public Resources Code Sections 21000 et seq.) (CEQA), 14 California Code of Regulations Sections 15000 et seq. (the "CEQA Guidelines") and Chapter 31 of the San Francisco Administrative Code ("Chapter 31"); and

WHEREAS, the Planning Commission found the FND was adequate, accurate and objective, reflected the independent analysis and judgment of the Department of City Planning and the Planning Commission, and approved the FND for the Project in compliance with CEQA, the CEQA Guidelines and Chapter 31; and

WHEREAS, the Planning Department, Jonas Ionin, is the custodian of records, located in File No. 2010.0641M, at 1650 Mission Street, Fourth Floor, San Francisco, California; now therefore, be it

RESOLVED, That the Planning Commission has reviewed and considered the FND and the record as a whole and finds that there is no substantial evidence that the Project will have a significant effect on the environment, and hereby adopts the FND; and, be it

NOW, THEREFORE BE IT RESOLVED, that pursuant to Planning Code Section 340, the Planning Commission finds the proposed amendments with the correction to "historical" on page 30 would serve the public necessity, convenience and general welfare, and for that reason adopts a Resolution to Adopt amendments to the General Plan of the City and County of San Francisco, in order to update the Recreation and Open Space Element of the General Plan, as set forth in the General Plan amendment ordinance for the proposed update, which is incorporated by reference as if fully set forth herein.

I hereby certify that the foregoing Resolution was ADOPTED by the City Planning Commission on April 3, 2014.

Jonas Ionin

Resolution
Hearing Date: April 3, 2014

CASE NO. 2010.0641 M
General Plan Amendment updating the
Recreation and Open Space Element of the General Plan

Commission Secretary

AYES: Wu, Fong, Sugaya, Hillis
NOES: Moore, Antonini
ABSENT: Borden
ADOPTED: April 3, 2014



SAN FRANCISCO PLANNING DEPARTMENT

Executive Summary

HEARING DATE: APRIL 3, 2014

Date: March 13, 2014
Case No.: 2010.0641 M
Project: Recreation and Open Space Element Update
Staff Contact: Susan Exline – (415) 558-6332
susan.exline@sfgov.org
Reviewed by: Joshua Switzky (Joshua.Switzky@sfgov.org)
Recommendation: Adoption of Proposed General Plan Amendments related to the update to the Recreation and Open Space Element

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PROJECT DESCRIPTION

The Recreation and Open Space Element of the General Plan is one of the ten elements of the San Francisco General Plan, guiding the City to “to ensure that the qualities that make San Francisco unique are preserved and enhanced.” Each element of the General Plan signifies the City’s overarching strategies and goals in the underlying matters. The Recreation and Open Space Element (ROSE) of the General Plan was last updated in 1986 and California State law requires all jurisdictions to maintain an up-to-date a relevant recreation and open space element.

In November 2007, the Mayor’s Office launched the Mayor’s Open Space Task Force, composed of over 80 landscape architects, open space advocates and residents from around the City. Their goal was to develop supportive open space policies, coordinate resources towards achieving open space goals, and create strategies to acquire, develop, renovate and maintain open space opportunities in every neighborhood. The work of this task force highlighted the need to update the Recreation and Open Space Element (ROSE) of the General Plan in order to address current opportunities and challenges to meeting the recreation and open space needs of the City today.

Public Outreach

After meeting for almost a year, the Task Force developed a series of overarching themes which provided direction for an update of the ROSE, and staff from the Planning Department, Recreation and Parks Department, and the Neighborhoods Parks Council (the City’s nonprofit partner at the time) embarked upon a series of meetings with neighborhoods, organizations, and City departments to develop open space goals, policies and objectives.

After about 17 meetings Planning staff developed the first *Draft Recreation and Open Space Element*. This Draft was released in May 2009 and reflected input and contributions from the Open Space Task Force, the community meetings and numerous city agencies. The Department received numerous comments from the community as well as public agencies. A revised Draft was published in June 2011, incorporating all comments and input received, followed by a hearing at the Planning Commission on August 4, 2011 to initiate adoption of the updated ROSE. The Commission and staff heard further

comments at and subsequent to the hearing from certain stakeholders. In the following months, the Department worked closely with these stakeholders to understand their remaining concerns through multiple targeted working group meetings. This final round of community outreach along with further coordination with public agencies resulted in further edits and a publication of an updated "Final" Draft ROSE in December 2013. This draft was presented first in a stakeholder meeting in November and then in a public open house in December.

Following the release of the draft in December 2013, Planning Department staff attended the Parks and Recreation Advisory Committee, attended a Coalition for San Francisco Neighborhoods meeting, presented once at the Recreation and Parks Commission and twice at the Historic Preservation Commission, and has held one-on-one meetings with stakeholders. The Department has received several comments and staff has carefully considered each comment, made some additional edits to the Draft ROSE, and prepared detailed responses to each comment in the attached Response to Comments Document, indicating how the proposed Draft ROSE addresses each comment.

Highlight of Comment Themes and Updates to the ROSE

Below is a high-level summary of the comments received and the policy updates included in the proposed Final ROSE as compared to December 2013 Draft. The majority of comments received on the December 2013 Draft ROSE fell into one of the themes listed below. For detailed responses to all comments, see the attached *Response to Comments*.

Preservation of Open Space

Staff received comments expressing concerns about how the ROSE and specifically Policy 1.3 could result in construction of new buildings in our parks. These comments argued that any building can be categorized as cultural and recreation building and therefore find their way into our existing open spaces. At the same time, we received many comments around the need for more supporting facilities and recreational facilities. Such variety of comments would call for a balance between conflicting policy approach that sets clear direction to limit new buildings while providing decision-makers guidance on evaluating the conditions under which new buildings would be appropriate. In Policy 1.3 staff modified the language in this policy to further clarify the definition of cultural buildings. The goal of this policy is to provide clarity if and when any structures are proposed in open spaces. Staff recognizes the legitimate concerns of the community regarding the preservation of open space. Policy 1.3 requires that detailed and specific criteria must be met before any new structure can be approved in an open space.

Recreation

Staff heard the need for the ROSE to more add more explicit focus on recreation needs and recreational facilities. Staff would like to clarify that the ROSE outreach process included many stakeholders interested in recreation as well as open space. Included in the introduction to the ROSE are a new definition of "recreation" and an explanation of how recreation assessments are completed according to guidance established in the City Charter. The term "recreation" was added throughout the document to clarify that both open space and recreation are included in these policy goals.

High Needs Areas

Many suggestions from the community were received on how to clarify and refine the definition of "high needs areas." Included in this final proposed Draft ROSE are changes to the High Needs Area maps that

reflect: (1) refined delineation of "growth areas," using all projected citywide growth based on existing zoning and pipeline projects as opposed to just reflecting neighborhoods with adopted areas plans; (2) a change in the source of data that mapped demographic information, using the 2010 Census data instead of the American Community Survey data of 2007-2012; and (3) changes that recognize that certain adopted master plans, such as Treasure Island, Mission Bay, and Hunter's Point Shipyard/Candlestick, contain development agreements and implementation or financing mechanisms to ensure provision of specific planned open spaces. New Maps are included to further clarify these revisions.

Partnerships and Commercialization of Parks

In response to comments concerning how public-private partnerships could result in commercialization or privatization of parks, additional policy language was added in Objective 6 to ensure accountability and transparency in any such partnerships. Additional language was added to clarify that it is the City's responsibility to adequately fund public resources such as parks and recreational facilities.

Golden Gate Park Master Plan

Many comments expressed concern about the language surrounding the Golden Gate Park Master Plan. Creation of a master plan for Golden Gate Park was called for in the 1986 ROSE. The Golden Gate Park Master Plan was adopted in 1996 after a 10-year process and is the result of an extensive process involving the City and the community. Commenters raised concerns that City was trying to imminently reopen this process by suggesting that the Master Plan should be assessed and updated at some future time. All components of the General Plan, including the ROSE, have a long-range vision and applicability of at least 20 years. As with the ROSE of 1986, adopted plans ought to be assessed every couple decades to evaluate whether their recommendations have been achieved, whether new needs have arisen, and whether new objectives should be set for current or future generations. Rather than *requiring* the Master Plan be reopened, the ROSE simply says that the City and the community should collectively assess whether any updates are needed in the future. The goal of this policy language is to ensure that the needs of Golden Gate Park continue to remain front and center as the City's premier park and recreational facility.

Privately Owned Publicly Accessible Spaces (POPOS)

Concerns and comments were raised about ensuring these spaces attract a variety of users and that policies on POPOS should be evaluated to determine how POPOS requirements can be strengthened and expanded citywide. Policy 2.12 was modified to reflect these concerns.

Biodiversity and Natural Areas Management

Staff received supportive comments for the language in Objective 4 and also comments expressing concerns about the policies on natural area management and removal of non-native habitats. The Final Draft ROSE clarifies this language further and recognizes that both native and non-native plant species have roles to play in our open spaces. Furthermore, language was provided to emphasize use of ecologically appropriate sustainable pest management practices.

Historic Preservation

During the initiation hearing at the Planning Commission on January 9th, 2014, suggestions were made that the ROSE ought to address historic preservation concerns in parks and open spaces. Staff conducted two informational hearings at the Historic Preservation Commission on February 5th and February 19th.

These hearings provided an opportunity for staff and the HPC to discuss additional policy language to the ROSE. Based on this collaborative review, staff has added two policies and an additional bullet point to the ROSE to highlight the need to consider historic preservation in evaluating investments and improvements to our parks and open spaces.

Sustainability

A new policy on sustainability was added to respond to comments from the public and the Historic Preservation Commission.

REQUIRED COMMISSION ACTION

Adopt amendments to the Recreation and Open Space Element of the General Plan.

NOTE: The resolution for adoption and draft ordinance will be included in the Commission packets at least one week in advance of the adoption hearing scheduled for April 3, 2014. This current packet contains the Final Draft ROSE proposed for adoption and the Response to Comments in order to provide the Commission and the public additional time -- at least 3 weeks -- to review the key material prior to the adoption hearing. All material, including a version that tracks all the changes to the ROSE since the December 2013 draft ROSE, will also be available online at <http://www.openspace.sfplanning.org> or by contacting staff.

ENVIRONMENTAL REVIEW

The Preliminary Negative Declaration was published on February 24, 2014 and the Final Negative Declaration will be submitted to the Commission upon its completion on March 27, 2014 and included in the commission packet for the April 3rd hearing.

PUBLIC COMMENT

Attached please find the Response to Comments document, which includes staff's responses and all comments submitted by the public.

RECOMMENDATION: Adoption of General Plan Amendments related to the update to the Recreation and Open Space Element

Attachments:

1. Final Draft Recreation and Open Space Element (Proposed for Adoption)
2. Response to Comments



SAN FRANCISCO PLANNING DEPARTMENT

Negative Declaration

Date: March 27, 2014; amended on March 27, 2014
(Amendments to the PND are shown in deletions as ~~strikethrough~~;
additions in double underline)

Case No.: 2010.0641E

Project Title: General Plan Recreation and Open Space Element (ROSE) Update

Project Sponsor: San Francisco Planning Department
Sue Exline, (415) 558-6332
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PROJECT DESCRIPTION:

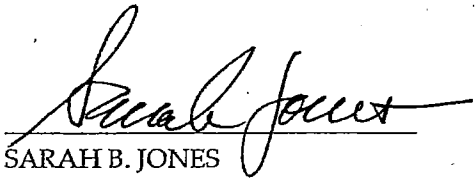
The proposed project consists of an update (amendment) of the existing, 1986 Recreation and Open Space Element (ROSE) of the San Francisco General Plan. The ROSE is a policy document that consists of general objectives and policies to guide comprehensive long-term planning, conservation and use of open space land and recreational facilities. California state law requires each city and county to adopt a general plan "for the physical development of the county or city, and any land outside its boundaries which bears relation to its planning." General plans are intended to underlie most land use decisions. The draft 2013 ROSE Update contains six objectives, with policies under each of the objectives. The objectives and policies in the existing, 1986 ROSE are proposed to be revised as follows: 1) the entire document is reorganized to eliminate distinctions between different types of open spaces (e.g., City-serving, District serving, Neighborhood-serving, etc.); 2) some objectives and policies are re-worded to reflect the concepts of the Open Space Framework; and 3) new policies are added based on community input.

The Approval by the Board of Supervisors is the Approval Action for the whole of the proposed project.

FINDING:

This project could not have a significant effect on the environment. This finding is based upon the criteria of the Guidelines of the State Secretary for Resources, Sections 15064 (Determining Significant Effect), 15065 (Mandatory Findings of Significance), and 15070 (Decision to prepare a Negative Declaration), and the following reasons as documented in the Initial Evaluation (Initial Study) for the project, which is attached.

In the independent judgment of the Planning Department, there is no substantial evidence that the project could have a significant effect on the environment.



SARAH B. JONES
Environmental Review Officer

March 27, 2014
Date of Adoption of Final Negative Declaration

cc: Sue Exline, Project Contact
Historic Preservation Distribution List

Distribution List
Virna Byrd, M.D.F

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INITIAL STUDY
GENERAL PLAN RECREATION AND OPEN SPACE ELEMENT (ROSE) UPDATE
PLANNING DEPARTMENT CASE NO. 2010.0641E

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INITIAL STUDY
GENERAL PLAN RECREATION AND OPEN SPACE ELEMENT (ROSE) UPDATE
PLANNING DEPARTMENT CASE NO. 2010.0641E

A. PROJECT DESCRIPTION

Background

This Initial Study is a review and evaluation of the Planning Department's proposed update (amendment) to the Recreation and Open Space Element (ROSE) of the *San Francisco General Plan* ("General Plan"). The ROSE is a policy document that consists of general objectives and policies to guide comprehensive long-term planning, conservation and use of open space land and recreational facilities. California state law requires each city and county to adopt a general plan "for the physical development of the county or city, and any land outside its boundaries which bears relation to its planning" (CA Government Code §65300). General plans are intended to underlie most land use decisions. State law requires that subdivisions, capital improvements, development agreements, and many other land use actions be consistent with a city or county's adopted general plan.

San Francisco's General Plan serves to:

- Identify the community's land use, circulation, environmental, economic, and social goals and policies as they relate to land use and development.
- Provide a basis for local government decision-making, including decisions on development approvals and exactions.
- Provide citizens with opportunities to participate in the planning and decision-making processes of their communities.
- Inform citizens, developers, decision-makers, and other cities and counties of the ground rules that guide development within a community. Protect, preserve, and enhance the economic, social, cultural, and esthetic values that establish the desirable quality and unique character of the city.
- Improve the city as a place for living, by aiding in making it more healthful, safe, pleasant, and satisfying, with housing representing good standards for all residents and by providing adequate open spaces and appropriate community facilities.
- Improve the city as a place for commerce and industry by making it more efficient, orderly, and satisfactory for the production, exchange and distribution of goods and services, with adequate space for each type of economic activity and improved facilities for the loading and movement of goods.

- Coordinate the varied pattern of land use with public and semi-public service facilities required for efficient functioning of the city, and for the convenience and well-being of its residents, workers, and visitors.
- Coordinate the varied pattern of land use with circulation routes and facilities required for the efficient movement of people and goods within the city, and to and from the city.
- Coordinate growth and development of the city with the growth and development of adjoining cities and counties and of the San Francisco Bay Region.

The manner in which the general goals are to be attained is set forth through a statement of objectives and policies in a series of elements that deal with a particular topic, applicable citywide. The General Plan includes "elements" that address state-mandated issues, additional non-mandatory elements that relate to San Francisco's physical development, a Land Use Index, and also Area Plans. The General Plan currently contains the following 10 elements: Housing, Commerce and Industry, Recreation and Open Space, Community Facilities, Transportation, Community Safety, Environmental Protection, Air Quality, Urban Design and Arts. The Land Use Index cross-references the policies related to land use located throughout the General Plan. An update to the ROSE is the subject of this Initial Study.

In addition to the 10 elements, which may be added from time to time, the General Plan also contains 18 Area Plans.¹ Area Plans are not mandated sections of the General Plan and focus on a particular geography of the City. They refine General Plan policies as they apply to a smaller geographic area and are implemented by ordinances and other discretionary actions. State law requires area plans to be internally consistent with the General Plan. The General Plan elements and Area Plans use a common format for land use categories, terminology, and diagrams.

Open Space Framework

The project sponsor, the San Francisco Planning Department, in conjunction with all City and County of San Francisco (City) agencies with Open Space jurisdiction, is proposing an update to the ROSE. The ROSE is a policy document that consists of general objectives and policies to guide comprehensive long-term planning, conservation and use of open space land. San Francisco last updated the ROSE in 1986. State law requires that a city's General Plan and its elements be periodically updated in order to prepare for its future. The update to the ROSE and content analyzed in this Initial Study is a product of a community-based planning process. Its goals are to better utilize existing open spaces, improve access to open space, and prioritize acquisitions and renovations of parks and open spaces in areas of high need for such space. The broad

¹ Currently, the General Plan's Area Plans include: Downtown, Chinatown, Rincon Hill, Civic Center, Van Ness Avenue, Western Shoreline, Northeastern Waterfront, Market and Octavia, Central Waterfront, East SoMa, Mission, Showplace Square/Potrero Hill, and Bayview Hunters Point (formerly South Bayshore) and Hunters Point Shipyard, Glen Park, Balboa Park Station Area Plan, Western SoMa, and Transit Center District Plan. As of 2014, the Central SoMa Plan (formerly Central Corridor Plan) is under review and may be formally adopted as an Area Plan for inclusion within the General Plan.

principles of the Open Space Framework, developed in conjunction with public input, are as follows:

Multi-functionality: A major theme developed from the public outreach process was the concept of “making the most of what we have,” that is, utilizing and improving the expansive network of open and natural spaces the City already provides. A variety of open space types should be integrated within the City’s existing spaces, by layering functions and uses to create high-performing open spaces. An integrated open space network includes streets, alleyways, creeks, parks, habitat areas, urban forests, trails, recreational facilities, shorelines, commercial and civic spaces, backyards, and even buildings, as components of a multifunctional system.

Sense of Place: The Open Space Framework promotes San Francisco’s role as a regional epicenter for ecological, economic, and cultural diversity. It is intended to build on the City’s intrinsic qualities, both natural and cultural, and to reflect the values the City places on cultural diversity and biodiversity. Furthermore, it aims to create a network that inspires a deep connection to place.

Equity and Accessibility: The Open Space Framework focuses on ensuring equitable distribution of open space and recreational programs. It is intended to provide access for all residents, workers and visitors, and works towards a democratic network that includes all neighborhoods in the benefits of a multi-functional open space system.

Connectivity: The Open Space Framework envisions a wholly connected network of open spaces. Such a system is intended to facilitate non-motorized movement, link diverse neighborhoods, be easy to navigate and understand and, where feasible, enhance habitat through connectivity.

Health and Safety: The Open Space Framework uses open space as a way to increase the City’s capacity as a safe and healthy place to live. It promotes social interaction, wellness, and a healthy lifestyle by providing opportunities for exercise, physical activity, cultural and social activities, and a connection to nature.

Ecological Function and Integrity: With environmental sustainability as a driving theme, the Open Space Framework seeks to expand the quantity and quality of natural systems in the City, by promoting aquatic and terrestrial biodiversity, by designing for watershed health, and by implementing environmental, ecological and conservation-minded strategies.

Sustaining Stewardship: The Open Space Framework aims to engage San Francisco’s residents as active, involved participants in the City’s future. Policies work towards shared, continued stewardship that increases the tangible link between citizens and their open space network. It seeks to create partnerships between public agencies, private business, and individual citizens to foster pride, purpose and community.

Description of Draft 2013 ROSE Update and Policy Context

The draft 2013 ROSE Update contains six objectives, with policies under each of the objectives, shown in Table 1, below, with the existing objectives and policies revised as follows: 1) the entire document is reorganized to eliminate distinctions between different types of open spaces (e.g., City-serving, District-serving, Neighborhood-serving, etc.) in the existing, 1986 ROSE; 2) some objectives and policies are re-worded to reflect the concepts of the Open Space Framework; and 3) new policies are added based on community input.

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Table 1: Proposed and Existing Recreation and Open Space Element Objectives and Policies

Draft 2013 ROSE Objectives or Policies	Related 1986 ROSE Objectives or Policies
OBJECTIVE 1 ENSURE A WELL-MAINTAINED, HIGHLY UTILIZED, AND INTEGRATED OPEN SPACE SYSTEM	
POLICY 1.1 Encourage the dynamic and flexible use of existing open spaces and promote a variety of open space uses, where appropriate.	POLICY 4.1 Make better use of existing facilities.
POLICY 1.2 Prioritize renovation in highly-utilized open spaces and in high needs areas.	POLICY 4.3 Renovate and renew the City's parks and recreation facilities.
POLICY 1.3 Preserve existing open space by restricting its conversion to other uses and limiting encroachment from other uses, assuring no loss of quantity or quality of open space.	POLICY 2.2 Preserve existing public open space.
POLICY 1.4 Maintain and repair open spaces to modern maintenance standards.	POLICY 3.2 Maintain and improve the quality of existing shoreline open space.
POLICY 1.5 Prioritize the activation of McLaren Park, Ocean Beach, the Blue Greenway and other underutilized significant open space.	POLICY 2.11 Develop McLaren Park into a high-quality, city-serving park.
POLICY 1.6 Support the continued improvement of Golden Gate Park while preserving the beauty of its naturalistic landscape.	POLICY 2.10 Develop a master plan for Golden Gate Park.
POLICY 1.7 Support public art as an essential component of open space design.	
POLICY 1.8 Support urban agriculture and local food security through development of policies and programs that encourage food production throughout San Francisco.	POLICY 2.12 Expand community garden opportunities throughout the City.
POLICY 1.9 Preserve sunlight in public open spaces.	POLICY 2.3 Preserve sunlight in public open spaces.
POLICY 1.10 Ensure that open space is safe and secure for the City's entire population.	
POLICY 1.11 Encourage private recreational facilities on private land that provide a community benefit, particularly to low- and moderate-income residents.	
<u>POLICY 1.12</u> <u>Preserve historic and culturally significant landscapes, sites, structures, buildings and objects.</u>	
<u>POLICY 1.13</u> <u>Preserve and protect character-defining features of historic resources in City parks, when it is necessary to make alterations to accommodate new needs or uses.</u>	

Draft 2013 ROSE Objectives or Policies	Related 1986 ROSE Objectives or Policies
<p>OBJECTIVE 2 INCREASE OPEN SPACE TO MEET THE LONG-TERM NEEDS OF THE CITY AND BAY REGION</p>	
<p>POLICY 2.1 Prioritize acquisition of open space in high needs areas.</p>	<p>POLICY 2.1 Provide an adequate total quantity and equitable distribution of public open spaces throughout the City.</p> <p>POLICY 2.7 Acquire additional open space for public use.</p> <p>POLICY 4.4 Acquire and develop new public open space in existing residential neighborhoods, giving priority to areas which are most deficient in open space.</p>
<p>POLICY 2.2 Provide and promote a balanced recreation system which offers a variety of high quality recreational opportunities for San Franciscans.</p>	
<p>POLICY 2.3 Provide recreational programs that are responsive to community needs and changing demographics.</p>	
<p>POLICY 2.4 Support the development of signature public open spaces along the shoreline.</p>	<p>POLICY 3.1 Assure that new development adjacent to the shoreline capitalizes on its unique waterfront location, considers shoreline land use provisions, improves visual and physical access to the water, and conforms with urban design policies.</p> <p>POLICY 3.4 Create a visually and physically accessible urban waterfront along the Embarcadero corridor between Fisherman's Wharf and China Basin.</p> <p>POLICY 3.5 Provide new public open spaces along the shoreline.</p>
<p>POLICY 2.5 Encourage the development of region-serving open spaces in opportunity areas: Treasure Island, Yerba Buena Island, Candlestick and Hunters Point Shipyard.</p>	<p>POLICY 1.1 Protect the natural character of regional open spaces and place high priority on acquiring new open spaces noted for unique natural qualities.</p>
<p>POLICY 2.6 Support the development of civic-serving open spaces.</p>	
<p>POLICY 2.7 Expand partnerships with open space agencies, transit agencies, private sector and nonprofit institutions to acquire, develop and/or manage existing open spaces</p>	<p>POLICY 1.4 Coordinate with regional parks districts, open space agencies, private sector and non-profit institutions to acquire and manage a regional greenbelt.</p>
<p>POLICY 2.8 Consider repurposing underutilized City-owned property as open space.</p>	
<p>POLICY 2.9 Address physical and bureaucratic barriers to opening schoolyards as community open space during non-school hours.</p>	<p>POLICY 4.2 Maximize joint use of other properties and facilities.</p>

Draft 2013 ROSE Objectives or Policies	Related 1986 ROSE Objectives or Policies
<p>POLICY 2.10 Improve access to and level of activity provided at San Francisco reservoirs.</p>	<p>POLICY 1.2 Make open space lands already in public ownership accessible to the public for compatible recreational uses.</p>
<p>POLICY 2.11 Assure that privately developed residential open spaces are usable, beautiful, and environmentally sustainable.</p>	<p>POLICY 4.5 Require private usable outdoor open space in new residential development.</p> <p>POLICY 4.6 Assure the provision of adequate public open space to serve new residential development.</p>
<p>POLICY 2.12 Expand the Privately-owned Public Open Spaces (POPOS) requirement to new mixed-use development areas and ensure that spaces are truly accessible, usable and activated.</p>	
<p>(policy remove)</p>	<p>POLICY 2.5 Preserve the open space and natural historic, scenic and recreational features of the Presidio.</p>
<p>OBJECTIVE 3 IMPROVE ACCESS AND CONNECTIVITY TO OPEN SPACE</p>	<p>OBJECTIVE 4 PROVIDE OPPORTUNITIES FOR RECREATION AND ENJOYMENT OF OPEN SPACE IN EVERY SAN FRANCISCO NEIGHBORHOOD</p>
<p>POLICY 3.1 Creatively develop existing publicly-owned rights-of-way and streets into open space.</p>	<p>POLICY 4.7 Provide open space to serve neighborhood commercial districts.</p>
<p>POLICY 3.2 Establish and implement a network of Green Connections that increases access to parks, open spaces, and the waterfront.</p>	
<p>POLICY 3.3 Develop and enhance the City's recreational trail system, linking to the regional hiking and biking trail system and considering historic water courses to improve stormwater management.</p>	<p>POLICY 1.3 Increase the accessibility of regional parks by locating new parks near population centers, establishing low user costs, improving public transit service to parks and creating bike and hiking trails.</p> <p>POLICY 2.8 Develop a citywide urban trails system that links city parks and public open spaces, hilltops, the waterfront and neighborhoods and ties into the regional hiking trail system.</p> <p>POLICY 3.3 Create a trail around the perimeter of the City which links open space along the shoreline and provides for maximum waterfront access.</p>

Draft 2013 ROSE Objectives or Policies	Related 1986 ROSE Objectives or Policies
<p>POLICY 3.4 Encourage non-auto modes of transportation – transit, bicycle and pedestrian access – to and from open spaces while reducing automobile traffic and parking in public open spaces.</p>	<p>POLICY 1.3 Increase the accessibility of regional parks by locating new parks near population centers, establishing low user costs, improving public transit service to parks and creating bike and hiking trails.</p> <p>POLICY 2.4 Gradually eliminate non-recreational uses in parks and playground and reduce automobile traffic in and around public open spaces.</p>
<p>POLICY 3.5 Ensure that open space is physically accessible, especially for those with limited mobility.</p>	<p>POLICY 2.6 Make open space accessible to people with special needs.</p>
<p>POLICY 3.6 Maintain, restore, expand and fund the urban forest.</p>	<p>POLICY 2.9 Maintain and expand the urban forest.</p>
<p>OBJECTIVE 4 PROTECT AND ENHANCE THE BIODIVERSITY, HABITAT VALUE, AND ECOLOGICAL INTEGRITY OF OPEN SPACES</p>	
<p>POLICY 4.1 Protect, preserve and restore local biodiversity.</p>	<p>POLICY 2.13 Preserve and protect natural resources.</p>
<p>POLICY 4.2 Establish a coordinated management approach for designation and protection of natural areas and watershed lands.</p>	<p>POLICY 1.1 Protect the natural character of regional open spaces and place high priority on acquiring new open spaces noted for unique natural qualities.</p>
<p>POLICY 4.3 Integrate the protection and restoration of local biodiversity into all open space construction, renovation, management and maintenance using environmentally sustainable design principles.</p>	
<p><u>POLICY 4.4</u> <u>Include environmentally sustainable practices in construction, renovation, management and maintenance of open space and recreation facilities.</u></p>	
<p>OBJECTIVE 5 ENGAGE COMMUNITIES IN THE STEWARDHIP OF THEIR RECREATION PROGRAMS AND OPEN SPACES</p>	
<p>POLICY 5.1 Engage communities in the design, programming and improvement of their local open spaces, and in the development of recreational programs.</p>	
<p>POLICY 5.2 Increase awareness of the City's open space system.</p>	
<p>POLICY 5.3 Facilitate and encourage the development of community-initiated or supported open spaces.</p>	
<p>POLICY 5.4 Reduce governmental barriers to community-initiated recreation and open space efforts.</p>	

Draft 2013 ROSE Objectives or Policies	Related 1986 ROSE Objectives or Policies
OBJECTIVE 6 SECURE LONG-TERM RESOURCES AND MANAGEMENT FOR OPEN SPACE ACQUISITION, OPERATIONS AND MAINTENANCE	
POLICY 6.1 Pursue and develop innovative long-term funding mechanisms for maintenance, operation, renovation and acquisition of open space and recreation.	

The public and decision-makers will consider the draft 2013 ROSE Update, policies and objectives in the above context.

Reasonably foreseeable future projects in or near parks and open spaces under the jurisdiction of the RPD include projects related to the 2008 Clean and Safe Parks Bond,² the 2012 Parks Bond,³ the Significant Natural Resource Areas Management Plan (SNRAMP), and several athletic field renovations. These projects primarily involve renovation of existing parks and open spaces.

Approach to Analysis

The subject of this Initial Study is an analysis of new policies and objectives comprising an update (amendment) to the ROSE of San Francisco's General Plan. This Initial Study approaches the analysis of the proposed ROSE policies, goals and objectives in a comprehensive, programmatic manner, and focuses the analysis on a series of potential actions (e.g., adoption of high-level policy) that may be characterized as one large project with elements related to each other either geographically or in the context of future legislation (such as the issuance of rules, regulations or plans).

Based on the definition of a "project" under CEQA (Section 15378 of the CEQA *Guidelines*) and case law interpreting CEQA, environmental review of an amendment to a General Plan or General Plan element need only analyze changes from a previously adopted plan or element. Thus, this Initial Study addresses the changes of the draft ROSE Update from the previous 1986 ROSE, as presented in Table 1. No specific development projects are analyzed in this Initial Study.

B. ENVIRONMENTAL SETTING

The ROSE applies to recreational and open spaces under the jurisdiction of the San Francisco Recreation and Park Department (RPD), including Sharp Park in the City of Pacifica in San Mateo County and Camp Mather located in Groveland in Tuolumne County.

² SFRPD. 2008 Clean and Safe Parks Bond. Available online at: <http://sfrecpark.org/park-improvements/2008-clean-safe-bond/>. Accessed February 19, 2014.

³ SFRPD. 2012 Parks Bond. Available online at: <http://sfrecpark.org/park-improvements/2012-bond/>. Accessed February 19, 2014.

Location

San Francisco is a consolidated city and county. As illustrated in Figure 1 below, the City is located on the tip of the San Francisco Peninsula with the Golden Gate Strait to the north, San Francisco Bay to the east, San Mateo County to the south, and the Pacific Ocean to the west. The City is one of nine counties adjacent to the San Francisco and San Pablo Bays. Daly City and the City of Brisbane abut San Francisco to the south. The City comprises a land area of approximately 49 square miles.

Sharp Park is a public park is located in the City of Pacifica in San Mateo County that is owned and operated by the RPD. It is bisected from north to south by the Pacific Coast Highway (PCH), with the project site located west of PCH. Sharp Park is bounded by the Pacific Ocean to the west. To the north and south, portions of Sharp Park are bordered by residential development. Sharp Park abuts portions of the Golden Gate National Recreation Area (GGNRA) to the south and east. Sharp Park contains an 18-hole golf course, an archery range, a clubhouse, a remediated former rifle range, a parking lot, and extensive natural areas including an approximately 27-acre wetland complex consisting of Horse Stable Pond (HSP), Laguna Salada (LS), a channel and culverts that connect HSP to LS, and adjacent wetlands.

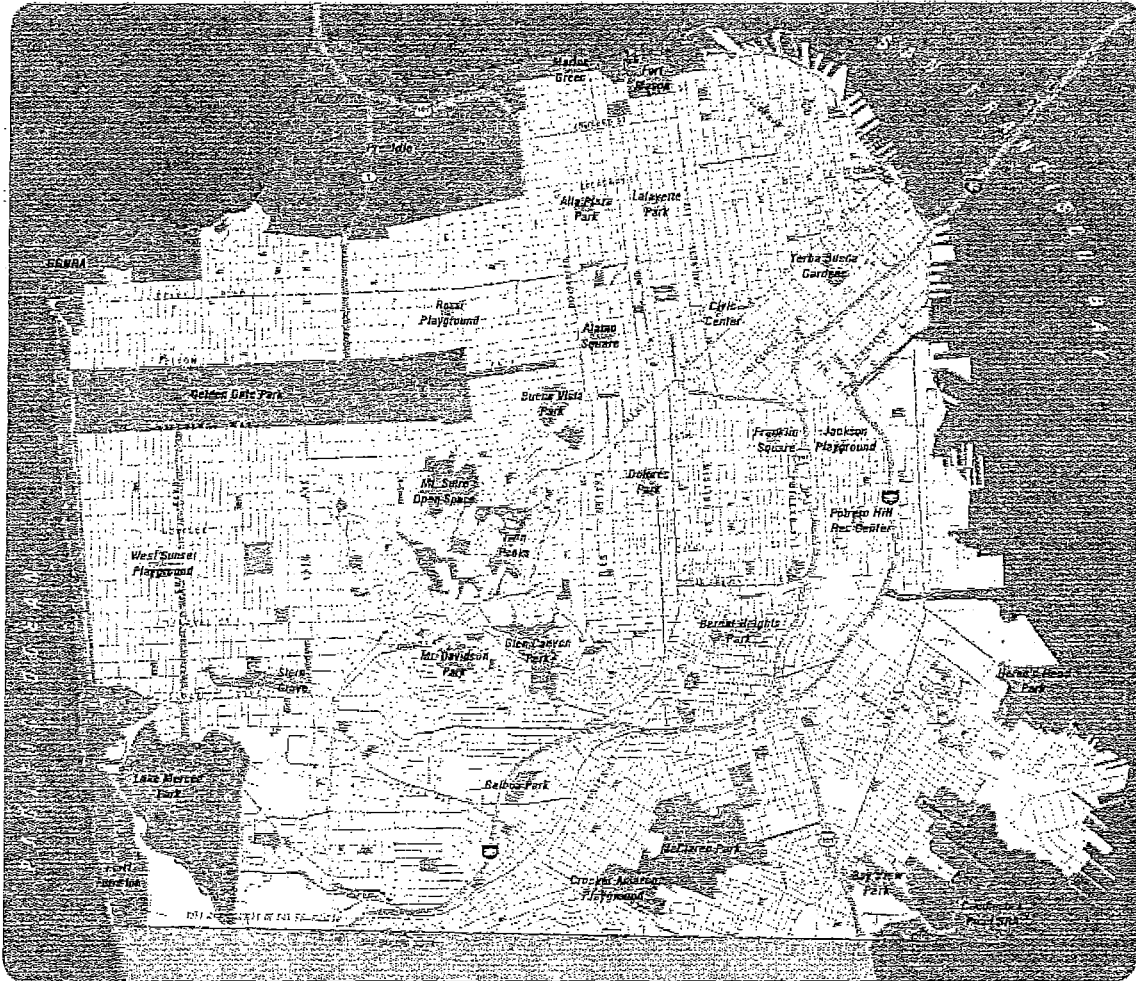
Camp Mather is located in Groveland in Tuolumne County and approximately 150 miles east of San Francisco near the Hetch Hetchy Valley, offering family camp activities with campfire entertainment, sport activities, supervised recreation programs for children, and fine dining.⁴

Regional Facilities

Regional recreational facilities are provided by the East Bay Regional Park District in Alameda and Contra Costa counties; the National Park System in Marin, San Francisco, and San Mateo counties; and several State Park recreation facilities located throughout the Bay Area. In addition, thousands of acres of watershed and agricultural lands are preserved as open spaces by water and utility districts or are in private ownership. The Bay Trail is a recreational corridor that, when complete, would encircle San Francisco and San Pablo Bays with a continuous 500-mile network of bicycling and hiking trails. It would connect the shoreline of all nine Bay Area counties, link 47 cities, and cross the major toll bridges in the region. To date, approximately 310 miles of the Bay Trail alignment, about 60 percent of its ultimate length has been completed.

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⁴ SFRPD. *Camp Mather*. Available online at <http://sfrecpark.org/destination/camp-mather/>. Accessed February 10, 2014.



Project Location

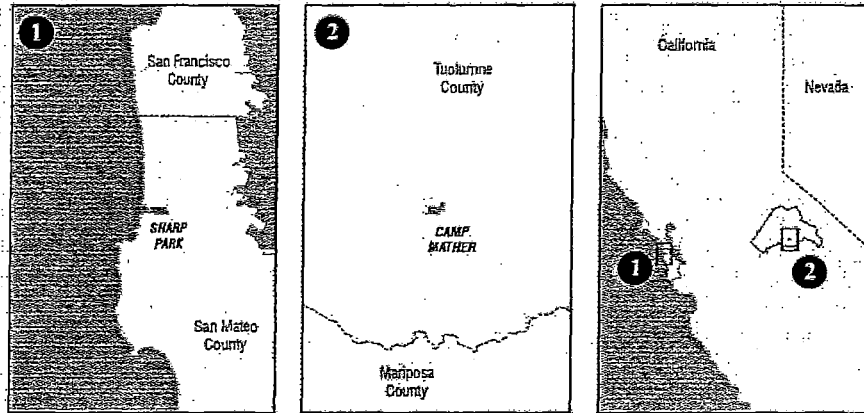


Figure 1: Project Location

City and County Facilities

Property in San Francisco that is permanently dedicated to publicly-accessible park and recreational uses totals roughly 5,890 acres. The provisional population estimate for San Francisco as of April, 2010, was 805,235, which equates to a ratio of roughly 7.3 acres of open space per 1,000 residents.⁵

A majority of local-serving parks and recreation facilities within San Francisco are owned and operated by the RPD. The RPD maintains 220 parks, playgrounds, and open spaces throughout the City, which function mainly for neighborhood use. The park system also includes 25 multi-use recreation centers, nine swimming pools and five golf courses, as well as hundreds of tennis courts, baseball diamonds, athletic fields and basketball courts. The RPD also manages the Marina Yacht Harbor, Candlestick Park, the San Francisco Zoo, and the Lake Merced Community Complex.⁶ The RPD currently owns and manages a total of approximately 3,400 acres of parkland and open space in San Francisco.⁷ In conjunction with community organizations, the City also maintains about 1,000 acres of natural land. The State owns approximately 255 acres at Candlestick Point State Recreation Area and Mount Sutro and the federal government owns approximately 1,600 acres primarily at the Presidio, Ocean Beach, Fort Funston, Lands End, Sutro Heights and China Beach, which are managed by the National Park Service (NPS) as part of the GGNRA. Figure 1 illustrates parks and open spaces within the City. This figure includes the City's community gardens, land owned by RPD and other open space areas (such as the Presidio, which is comprised of NPS land).

Several larger open space areas, including Golden Gate Park (approximately 1,000 acres), the Lake Merced complex (approximately 600 acres; 245-acre lake) and John McLaren Park (approximately 300 acres) comprise about one-half of the total City-owned acreage in recreational/open space use. These larger areas provide programs, activities or recreational opportunities that serve the City as a whole. These spaces, in addition to smaller areas with unique attributes such as water features or hilltop vista points, function as city-serving open spaces because they attract residents from the entire City.

Types of Uses and Activities

RPD's facilities offer a wide array of uses and activities to the public. Some facilities and activities are provided by third party entities through long-term RPD leases. These include clubhouses for nursery and daycare services, Golden Gate Park Bike Rentals, the Japanese Tea Garden Restaurant, the Zoo, golf courses, the Beach Chalet, Coit Tower, and museums. Other uses, organized activities and attractions are permitted through the RPD's Permits and Reservations Division. According to the most current data, the RPD permits between 50-60,000 activities

⁵ State of California, Department of Finance, Census 2010, from www.dof.ca.gov, accessed March 9, 2011.

⁶ In cases where a park or open space is subject to the Public Trust Doctrine (generally within the coastal zone), these spaces are managed by the Port of San Francisco. San Francisco Recreation and Parks Department and the Port of San Francisco, www.sfreckpark.org and www.sfport.com, accessed September 6, 2011.

⁷ San Francisco Neighborhoods Park Council, "Green Envy: Achieving Equity in Open Space." Available online at <http://sfnpc.org/greenerenvy/>, Table 5, pg. 1, accessed March 9, 2011.

annually. As shown in Table 2, below, the RPD issued 54,698 permits for the 2010-2011 fiscal year.⁸

The types of permitted activities on park properties range from small scale events (e.g., birthday parties and picnics), weddings, athletic rentals for kickball, softball, soccer, to larger scale events like the Outside Lands music festival and marathons (e.g., Bay to Breakers). Some permits are for ongoing activities, like those for Off the Grid that permit mobile food cart operation. The majority of permits are provided for athletic events: 76 percent are for baseball, soccer and other field use; picnics and recreation rooms rentals make up about 16 percent of permitted activities; 3 percent of the permits are for indoor events at gymnasiums; special events account for another 3 percent, and weddings and film permits total less than one percent of all permits RPD issues.

Table 2: RPD Permits (2010-2011)

Event/Permit	Number Issued
Film	241
Wedding sites	357
Gymnasia	1,400
Special Events	2,000
Recreation Center Rooms	3,137
Other Athletics	3,606
Picnics	5,643
Baseball Diamonds	9,967
Soccer Fields	28,617
TOTAL	54,698

The size of permitted events varies from 10 to more than 150,000 persons. On average, picnics accommodate about 15 people; the San Francisco Cross Country Running Race accommodates about 200 people at the Golden Gate Park Polo Field; the SF Jazz Summersets in Union Square permits 500 people; the Twitter Employee Picnic in Golden Gate Park's Speedway Meadow hosts about 1,200 employees; Family Day Kite Festival at Marina Green has attendance levels of about 5,000 persons; the Nike Women's Marathon draws about 25,000 participants to Golden Gate Park, while the Hardly Strictly Bluegrass festival have visitor levels of about 150,000 persons.

Permits are tailored to the specific event, each with a different set of obligations and requirements. Where relevant, permits regulate the type and location of structures; require a transportation plan for events with more than 10,000 attendees; require Americans with Disabilities Act (ADA) compliance and possibly safety monitors; as well as include set up and clean-up provisions, restrictions on smoking, and liability for damages.

⁸ Email communication with Lisa Beyer, Recreation and Parks Department, July 28, 2011. This information is available for review in Case File 2010.0641E at the Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA.

C. COMPATIBILITY WITH EXISTING ZONING AND PLANS

	<i>Applicable</i>	<i>Not Applicable</i>
Discuss any variances, special authorizations, or changes proposed to the Planning Code or Zoning Map, if applicable.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Discuss any conflicts with any adopted plans and goals of the City or Region, if applicable.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Discuss any approvals and/or permits from City departments other than the Planning Department or the Department of Building Inspection, or from Regional, State, or Federal Agencies.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Planning Code and Zoning

The San Francisco Planning Code (“Code”), which incorporates by reference the City’s Zoning Maps, governs permitted uses, densities, and the configuration of buildings within San Francisco. Implementation of the draft ROSE Update would require General Plan text amendments, though no variances, special authorizations, or changes to the Zoning Maps would be necessary. The following Code Sections relate to open space and recreation:

Section 135 (et. seq.) – Usable Open Space for Dwelling Units and Group Housing in Residential, Neighborhood Commercial, Mixed Use, Commercial and Industrial Districts. Generally, the Code requires that usable open space be provided for each dwelling unit and each group housing structure in Residential (R), Neighborhood Commercial (NC), Commercial (C), Mixed Use (MU), and Industrial (M, or more recently “Production, Distribution and Repair” – or PDR) Districts. The Code requires that usable open space be comprised of an outdoor area or areas designed for outdoor living, recreation or landscaping, including such areas on the ground as well as on decks, balconies, porches and roofs, which are safe and suitably surfaced and screened on the same lot as the dwelling units (or bedrooms in group housing) they serve in either private or commonly accessible spaces. The amount of required open space is dependent on the use district in which a specific property is located and whether the space provided is private or commonly accessible. The Code requires between 300 square feet of private open space per dwelling unit in the City’s lowest density residential districts and 36 square feet in its highest, with differing amounts linked to the specific use district. The Code also allows for the substitution of private for common open space at a ratio of 1.33 (except in Chinatown districts where it is 1.00). The Code also requires that streetscape improvements that are provided to meet publicly-accessible open space requirements must also conform to Better Streets Plan guidelines and other applicable neighborhood streetscape plans as discussed in Section 138.1 (see below).

Draft ROSE Policy 2.11 states “Assure that privately developed residential open spaces are usable, beautiful and environmentally sustainable,” and is similar to Policies 4.5 and 4.6 in the existing ROSE calling for adequate amounts of open space to be developed as part of residential projects. Any amendment to the Code would be subject to specific study and review. The policies in the draft ROSE Update would not amend the specific ratios of usable open space required by this section, and would therefore not conflict with Planning Code Section 135.

Section 138 – Open Space Requirements in C-3 Districts. This Code provision requires applicants constructing new buildings or an addition of gross floor area equal to 20 percent or more of an existing building in C-3 (e.g., Downtown Commercial) districts to provide open space

in relation to the gross square feet of the overall project. Generally, depending on the type of use district within the C-3, the Code requires 1 square foot of open space for every 50 gross square feet of a particular use. In C-3-R (Downtown Commercial, Retail) districts, the Code requires a ratio of 1 square foot of open space for every 100 gross square feet of retail use. Open spaces may be on, or within 900 feet of the subject property, though they must be entirely within a C-3 use district. Subsection 138(d) also sets forth other standards with respect to the types and location of open space. Draft ROSE Update Policy 2.11 ("Assure that privately developed residential open spaces are usable, beautiful and environmentally sustainable.") and Policy 2.12 ("Expand the Privately-owned Public Open Spaces (POPOS) requirement to new mixed-use development areas and ensure that spaces are truly accessible, usable and activated.") would not conflict with this Code Section because these policies relate to existing ROSE Policies 4.5 and 4.6 that call for requiring usable open space as part of new residential development and that the amount of space be adequate to serve that development. Furthermore, no amendments to the Code controls related to the amount of open space required as part of private residential development are proposed as part of the draft ROSE Update.

Section 138.1 – Streetscape and Pedestrian Improvements. Adopted in May 2010, Section 138.1 codifies requirements for the improvement of public rights-of-ways associated with development projects, such that public right-of-ways may be "safe, accessible, convenient and attractive to pedestrian use and travel by all modes of travel consistent with the San Francisco General Plan, achieve best practices in ecological stormwater management, and provide space for public life, social interaction, in accordance with the City's Better Streets Policy." This section requires that pedestrian and streetscape elements included as part of development projects follow the principles and guidelines for street typologies outlined in the Better Streets Plan. These requirements apply to street trees (setting forth the size and type of trees required) and other streetscape and pedestrian elements for large projects (e.g., those that involve new construction on lots greater than 0.5-acre, have more than 250 feet of lot frontage, or have a lot frontage on an entire block face, as well as in some cases projects that entail substantial additions or alterations). In such a case, the Code requires the Planning Department to consider standard streetscape elements to be included in the public realm or sidewalk widening per the Better Streets Plan. The draft ROSE Update contains policies and objectives that relate to the intent of the Better Streets Plan and implementing Planning Code controls (e.g., proposed Policy 2.6, Policy 2.8, Objective 3, Policy 3.1 and Policy 3.3) and would not conflict with the Code Section 138.1.

Planning Code Section 412 – Downtown Park Special Fund. Existing public park facilities located in the downtown office districts are at or approaching capacity utilization by the daytime population in those districts. The need for additional public park and recreation facilities in the downtown districts will increase as the daytime population increases as a result of continued office development in those areas. While the open space requirements imposed on individual office and retail developments address the need for plazas and other local outdoor sitting areas to serve employees and visitors in the districts, such open space cannot provide the same recreational opportunities as a public park. In order to provide the City with the financial resources to acquire and develop public park and recreation facilities which will be necessary to serve the burgeoning daytime population in these districts, Section 412 et seq establishes a

Downtown Park Fund to address these needs. Generally, project applicants are assessed a fee of \$2 per square foot of the net addition of gross floor area of office use to be constructed as set forth in the final approved building or site permit. The policies proposed as part of the draft ROSE Update would neither amend these existing requirements, nor otherwise conflict with this Code Section.

Section 234 – Public Use (P) Districts. Parks and open spaces are generally within Public (P) Use Districts. The purpose of designating such land as a P District on the Zoning Map is to relate the Zoning Map to actual land use and to the General Plan with respect to such land. Public structures and uses of the City that are consistent with the General Plan are principally permitted uses in a P District. Implementation of the draft ROSE Update would not change or conflict with any existing use district, including P Districts.

Section 290 – Open Space (OS) Height and Bulk Districts. In the Open Space Districts designated by the symbol "OS" on Sectional Map Nos. 1H through 13H of the Zoning Map, the height and bulk of buildings and structures are determined in accordance with the objectives, principles and policies of the General Plan, and no building or structure or addition thereto may be permitted unless in conformity with the General Plan. The inclusion of land in OS Districts is intended to indicate its principal or exclusive purpose as open space, with future development of any character strictly limited. Implementation of the draft ROSE Update would not alter or conflict with any existing Height and Bulk District.

Plans and Policies: Adopted Area Plans

Balboa Park Station Area Plan

In 2008, the City adopted the Balboa Park Station Area Plan with the goal of restoring, revitalizing, and enhancing an approximately 210-acre area located in south central San Francisco surrounding the Balboa Park Bay Area Rapid Transit (BART) and Muni station. The Area Plan is guided by three primary principles, including: improving the public realm, making the transit experience safer and more enjoyable, and improving the economic vitality of the Ocean Avenue Neighborhood Commercial District. The Area Plan contains policies pertaining to land use, transportation, parking, housing, streets and open space, built form, historic preservation, and public art.

With respect to parks and recreational resources, Balboa Park, at approximately 24 acres, is the largest park in the area and includes a public swimming pool, a children's playground, a stadium, baseball diamonds, tennis courts and the Ingleside police station. Area Plan Policy 5.12 states, "Safe and active open spaces should be designed, including a re-design of Balboa Park," which generally relates to Policy 1.1 and 1.2 in the draft ROSE Update that call for "Encourage the dynamic and flexible use of existing open spaces and promote a variety of open space uses, where appropriate" and "Prioritize renovation in highly-utilized open spaces and in high needs areas," respectively. The Area Plan also envisions the creation of a system of neighborhood open spaces, including active, passive and informal gathering areas, such as publicly accessible neighborhood and transit-oriented parks, plazas and a children's playground. The draft ROSE Update policies would not conflict with those in the Balboa Park Station Area Plan.

Bayview/Hunters Point (formerly South Bayshore)

The Bayview/Hunters Point neighborhood covered by the 700-acre Bayview/Hunters Point Area Plan, is located in the southeastern portion of San Francisco, surrounded by the neighborhoods of Candlestick and Executive Park to the south, Visitacion Valley, Portola, and Bernal Heights to the west, the Central Waterfront and Showplace Square/Potrero Hill to the north, and San Francisco Bay to the east. The Area Plan's principle objectives are to achieve a favorable balance among residential, industrial, commercial and open space uses; to stimulate development in underused and declining areas; to enhance its low scale physical character; and to increase pedestrian-oriented neighborhood commercial and social activities.

The Area Plan area includes 15 parks and recreational spaces, the largest of which is the approximately 170-acre Candlestick Point State Recreation Area. The Area Plan's policies call for, among others, making better use of existing facilities; making joint use of existing recreation and educational facilities; and providing a continuous open space along the southeastern shoreline. These policies are generally consistent with existing ROSE Policy 1.1 ("Protect the natural character of regional open spaces and place a high priority on open spaces noted for unique, natural qualities.") and those proposed by the ROSE Update, particularly Policy 2.5, which "Encourage the development of region-serving open spaces in opportunity areas: Treasure Island, Yerba Buena Island, and Candlestick and Hunter's Point Shipyard." The draft ROSE Update's objectives and policies would not conflict with those in the Bayview/Hunters Point Area Plan.

Central Waterfront

The Central Waterfront Plan area is bounded by Mariposa Street on the north, San Francisco Bay on the east, Islais Creek on the south, and I-280 on the west. The Central Waterfront is characterized primarily by PDR businesses in the area's many one- and two-story structures. Housing is concentrated around the Dogpatch neighborhood, between 20th and 22nd Streets and Indiana and 3rd Streets. Neighborhood-serving business and services are located on 22nd Street, which acts as Dogpatch's commercial heart. The approximately 1.8-acre Esprit Park is the neighborhood's primary open space. Objective 5 in the Central Waterfront Plan concerns itself with streets and open space, and includes policies that are intended to: promote parks and open spaces that meet the needs of area residents, workers and visitors; create green streets that connect open spaces and improve walkability and neighborhood aesthetics; create high quality open space in private developments; and maintenance of existing open space, recreation and park facilities. As discussed on draft ROSE Update under Policy 2.4, the Port of San Francisco (Port) is planning a number of open spaces and improvements to the central and southern waterfronts that will help address open space and recreational needs that will be connected by "the Blue Greenway," a recreational greenway which will extend from Mission Creek to the City's southern border, completing San Francisco's portion of the Bay Trail. Projects in the Southeastern Waterfront include, but are not limited to, Mission Bay waterfront open spaces, the Port's Blue Greenway projects and the India Basin (SFRA Area C), Hunters Point Shipyard and Candlestick projects and connections to San Mateo County.

The proposed Blue Greenway responds to Policy 2.4 of the draft ROSE Update calling to “support the development of signature public open spaces along the shoreline,” which would generally advance and not conflict with the open space policies in the Central Waterfront Plan.

Chinatown

The area covered by the Chinatown Area Plan includes 30 blocks in whole or in part on the eastern slopes of Nob Hill as well as portions of Russian Hill. The Financial District lies to the east of Chinatown and to the south is Union Square. Grant Avenue, Stockton Street and the hillside blocks that intersect them comprise the core of Chinatown. Portsmouth Square, Chinese Playground and the Chinese Recreation Center are the primary neighborhood open spaces and recreational facilities.

In 1998, A Chinatown Alleyway Master Plan was commissioned by the Department of Public Works and authored by the non-profit Chinatown Community Development Center, to provide guidelines for the renovation of 31 alleys in Chinatown. The alleyway renovation projects were designed to reduce illegal parking and vehicle access, in order to improve pedestrian safety, mandate access improvements for the disabled and elderly, reduce illegal dumping through the consolidation of dumpster areas, create open space through the installation of landscape features and seating where appropriate, provide attractive and safe secondary streets for tourists and visitors, and improve the overall quality of life for Chinatown residents. Implementation of the Chinatown Alleyway Master Plan has been completed including five phases of alleyway renovation projects. The alleys renovated include Jack Kerouac, Waverly Place (two alleys), John, Commercial, Ross, Cordelia and Hang Ah, Beckett, Wentworth and Cooper alleyways.⁹

The Chinatown Area Plan includes Policy 4, which calls for “Expand[ing] open space opportunities,” which is consistent with Objective 2 of the draft ROSE Update that calls for “Increas[ing] open space to meet the long-term needs of the City and Bay Region,” and would be generally consistent with proposed ROSE Policy 2.1, which calls for prioritizing “the acquisition of open space in high needs areas,” which corresponds to existing ROSE Policy 4.4 to “Acquire and develop new public open space in existing residential neighborhoods, giving priority access to areas which are most deficient in open space.” The draft ROSE Update policies would not conflict with the objectives and policies in the Chinatown Plan.

Civic Center

The geographic area covered by the Civic Center Area Plan generally includes the area between Franklin, McAllister, Market, and Hayes Streets. The area is encompassed by multiple neighborhoods, including Downtown and the Western Addition. The Area Plan’s objectives entail maintaining and reinforcing the symbolic and ceremonial focus of government culture, as well as developing the area as a cohesive center for government, cultural, ceremonial and community activities. Civic Center Plaza is the primary open space in the district, which also serves the nearby Uptown Tenderloin and Mid-Market areas. Policy 3 of the Civic Center Plaza Area Plan calls for designing buildings and open spaces to serve as public gathering places for ceremonial, cultural and recreational activities, while Policy 4 calls for providing a sense of

⁹ San Francisco Department of Public Works, streetscape projects, www.sfdpw.org, accessed August 17, 2011.

identity and cohesiveness through unifying street and plaza design treatments. Draft ROSE Update Policy 2.6 calls for “Support[ing] the development of civic-serving open spaces,” which, as envisioned in the ROSE Update, would entail “a series of connected open spaces, along a Civic Center axis from Market Street to City Hall could be created with the development of pedestrian mall along Fulton Street between the new Main Library and Asian Art Museum, and with corresponding activity improvements to increase the usability of the Civic Center and UN Plazas.”¹⁰ The draft ROSE Update policies would not conflict with the Civic Center Area Plan.

Downtown Plan

The geographic area covered by the Downtown Plan is roughly bounded to the west by Franklin Street, to the east by the Embarcadero, to the north by Washington Street or Bush Street, and to the south by Folsom Street. The Downtown Plan grows out of an awareness of the often conflicting civic objectives between fostering a vital economy and retaining the urban patterns and structures which collectively form the physical essence of San Francisco. The Plan envisions downtown as a center of ideas, services and trade and as a place for stimulating experiences. Key parks and open spaces in the downtown include Justin Herman Plaza, the public access pier at Pier 7, Sue Bierman Park, Redwood Park, Yerba Buena Gardens, Union Square, St. Mary’s Square, Boeddeker Park, MacCaulay Park, and the Tenderloin Playground.

Notable Downtown Plan policy objectives related to open space in the dense commercial office core entail Policy 9.1 (“Require usable indoor and outdoor open space, accessible to the public, as part of new downtown development.”), Policy 9.2 (“Provide different kinds of open space downtown.”), Policy 9.3 (“Give priority to development of two categories of highly valued open space; sunlight plazas and parks.”) and Policy 11.1 (“Place and arrange open space to complement and structure the urban form by creating distinct openings in the otherwise dominant streetwall form of downtown.”). These policies and supporting provisions of the Planning Code (primarily Sections 138: Open Space Requirements in C-3 Districts, and 138.1: Pedestrian Streetscape Requirements in C-3 Districts) have guided the development of 31 privately-owned public open spaces (POPOS) since adoption of the Downtown Plan in 1985.¹¹ The ROSE Update contains related Policy 2.12 “Expand the Privately-owned Public Open Spaces (POPOS) requirement to new mixed-use development areas and ensure that spaces are truly accessible, usable and activated.”

The policies in the draft ROSE Update would not conflict with the existing Downtown Plan policies or Planning Code sections that pertain to open space.

East South of Market Area Plan (East SoMa)

The East SoMa Area Plan covers an irregularly-shaped geographic area which generally extends to 7th and 4th Streets on its west, Mission and Folsom Streets on its north, Harrison and Townsend Streets on its south and the Embarcadero on its east. Community-driven goals for the

¹⁰ Draft ROSE Update, p. 26.

¹¹ The Planning Departments 2012 Downtown Monitoring Report indicates 81 POPOs in the Downtown Area, 31 of which were provided prior to the 1985 Downtown Plan. Available online at http://www.sf-planning.org/ftp/files/Citywide/Downtown_Annual_Report_2012.pdf. Accessed February 13, 2014.

East SoMa Plan Area include: encouraging an appropriate mix of land uses; retaining and promoting businesses and organizations that contribute to the diversity of the neighborhood; encouraging more neighborhood-serving businesses; attracting jobs for local residents; encouraging a mix of incomes in renter and owner-occupied housing and increasing affordable housing opportunities; offering a variety of transportation options; improving the character of streets and encouraging pedestrian safety; and improving community facilities and enhancing open space. Parks and recreational facilities in the neighborhood include South Park, Victoria Manolo Draves Park and the South of Market Recreation Center.

The Area Plan's Streets and Open Space chapter addresses major open space objectives, including: meeting resident and worker needs; developing high-quality private open spaces; creating a network of green streets; beautifying the neighborhood and strengthening the environment; and ensuring adequate maintenance. Within that framework, the East SoMa Area Plan includes, for example, Policy 5.1.1 to: Identify opportunities to create new public parks and open spaces and provide at least one new public park or open space serving the East SoMa; Policy 5.3.1: Redesign underutilized portions of streets as public open spaces, including widened sidewalks or medians, curb bulb-outs, "living streets" or green connector streets; Policy 5.3.4: Design the intersections of major streets to reflect their prominence as public spaces; and Policy 5.4.1: Increase environmental sustainability of East SoMa's system of public and private open spaces by improving the ecological function of all open space. These policies generally embrace the primary objectives in the ROSE Update, including Policy 2.1: Prioritizing acquisition of open space in high needs areas; Objective 3: Improve access and connectivity to open space; and Objective 4: Protect and enhance the biodiversity, habitat value, and ecological integrity of open spaces. The Area Plan identifies areas between Howard and Folsom, 4th and 5th Streets, as the area near Bryant and 4th Streets as areas in which to acquire and develop sites for open space or neighborhood parks. The East SoMa Area Plan also identifies Minna, Natoma and Russ Streets as alleys where "living street" treatments¹² may be applied, as well as on Folsom Street, Townsend Street, 2nd Street and 7th Street. The policies of the draft ROSE Update would not conflict with those in the East SoMa Plan.

Hunters Point Shipyard Area Plan

Hunters Point Shipyard is located in the southeast quadrant of San Francisco, approximately 1.3 miles northeast of the City's southern boundary and approximately six miles south of Downtown. The shipyard is comprised of a largely flat 493-acre landfill peninsula. It is surrounded on three sides by water and is bordered on its land side by Hunters Point Hill. Park and Recreation facilities within the area include the 11.5-acre Indian Basin Park and Milton Myer Recreation Center. Objective 7 in the area plan states: "Create a world class system of open space that includes a significant portion of the overall Hunters Point shipyard, enables improvements to the shoreline that enhances access, provides a wide range of recreational and ecological restoration opportunities, and is seamlessly integrated with the existing neighborhood." This objective relates to the draft ROSE Update Policy 4.3 which calls for integration of "the protection and restoration of local biodiversity into all open space

¹² Living streets or alleyways where traffic is calmed and paving and landscaping are designed to reflect the pedestrian primacy of these streets.

construction, renovation, management and maintenance using environmentally sustainable design principles” and Policy 4.4 which calls for inclusion of “environmentally sustainable practices in construction, renovation, management and maintenance of open space and recreation facilities.” and would not conflict with these policies. The policies and objectives in the draft ROSE Update would not conflict with the Hunters Point Shipyard Area Plan.

Market and Octavia

The geography of the Market and Octavia Area Plan includes the area bounded roughly by 9th Street to the east, 16th Street to the south, Sanchez Street to the west, and Turk Street to the north. The removal of the Central Freeway and construction of Octavia Boulevard provided local opportunities to reconnect the community and to transform the area into a more vibrant, urban place. The Market and Octavia Area Plan encourages new mixed-use development, including a substantial amount of new housing intended to strengthen and enhance the area’s character. Area parks and recreational facilities include Jefferson Square and Hayward Playground, Koshland Park, Duboce Park and Patricia’s Green.

Compared with the City’s other adopted area plans, the thrust of the Market and Octavia Area Plan’s open space policies are geared toward better and more comprehensive use of existing public streets and rights-of-ways as assets to the neighborhood’s open space network. Objective 4.1 calls for providing “safe and comfortable public rights-of-way for pedestrian use and improve[ing] the public life of the neighborhood.” Individual policies call for enhanced landscaping, prioritizing intersection improvements, creating new open spaces around the freeway touchdown, and enhancing the transit hub around the Market and Church Streets, among other things.

The Area Plan calls for living street improvements on the following streets, alleyways and public rights-of-way: Birch, Ivy, Linden, Hickory, Lily, Rose, Laussat, Carmelita, Potomac, Herman, Walter, Henry, Belcher, Reservoir, Landers, Sharon, Alert, Hildago Terrace, Rosemont, Ramona, Pink, Pearl, Clinton Park, Brosnan, Stevenson, Jessie, McCoppin, Gough, Brady, Colusa, Minna, Lafayette and Plum. The Area Plan prioritizes open space and streetscape improvements as funding becomes available over time. The Area Plan also envisions a new, roughly 13,000-square-foot neighborhood park (“Brady Park”) on a block bounded by Market, Gough, Otis and 12th Streets, consistent with the draft ROSE Update’s identification of this part of the neighborhood as a “focus area” for City renovation and acquisition of open space.¹³ The policies in the draft ROSE Update would not conflict with the Market and Octavia Area Plan.

Mission

The Mission plan area is bounded by Guerrero Street to the west, Potrero Avenue to the east, Division Street to the north and Cesar Chavez Street to the south. Parks and recreational spaces in the Mission include Franklin Square, KidPower Park, Mission Playground, Alioto Mini Park, Jose Coronado Playground, Mission Center, Parque Niños Unidos, Juri Commons, the 24th & York Mini Park and Garfield Square. Based on analysis conducted for the Mission Area Plan, the Mission has a total existing deficiency in neighborhood-serving open spaces of upwards of 4.3

¹³ Draft ROSE Update, High Needs Areas, p. 21.

acres that should be provided to accommodate forecasted growth. Similar to the East SoMa Area Plan, the Mission Area Plan also includes a policy (5.1.1) that calls for identifying “opportunities to create public parks and open spaces and provide at least one new public park or open space serving the Mission.” The Area Plan calls out the northwest Mission (generally between Division Street, South Van Ness Avenue, 18th Street and Guerrero Street) and 21st to 23rd and Harrison to Florida Streets as areas in which to acquire and develop sites for open space or neighborhood parks.

In keeping with Mission Area Plan Policy 5.1.1, the RPD recently acquired a parcel from the San Francisco Public Utilities Commission (SFPUC) on the north side of 17th Street between Folsom and Shotwell Streets for the construction of a 34,300-square-foot neighborhood park. The Planning Department issued a Community Plan Exemption and Mitigated Negative Declaration for the property acquisition and park development, which found that this project would be “expected to provide a foundation of stability in the form of open space use that could serve as an enhancement to the existing communities.”¹⁴

Other policies in the Area Plan call for the creating a system of “green connector streets” in the neighborhood (e.g., 16th, 20th and 25th Streets and South Van Ness Avenue)¹⁵ as well as ensuring recreation and park facilities are well maintained. See also discussion of the Mission Streetscape Plan and the Better Streets Plan, p. 28 of this document, respectively, for more information. Taken together, the policies in the draft ROSE Update would not conflict with the Mission Area Plan.

Northeastern Waterfront

The Northeastern Waterfront Area Plan encompasses the city’s waterfront and inland blocks from the Municipal Pier at the end of Van Ness Avenue to South Beach Harbor/McCovey Cove near AT&T Park. The Area Plan contains objectives and policies designed to contribute to the waterfront’s environmental quality, to enhance the economic vitality of the Port and the City, to preserve the unique maritime character, and to provide for the maximum feasible visual and physical access to and along the Bay.

The Area Plan’s primary recreation and open space objective is to “strengthen and expand the recreation character of the northern waterfront and to develop a system of public open spaces and recreation facilities that recognizes its recreational potential, provides utility and identity to the urban area, and establishes an overall waterfront character of openness of views, water and sky and public accessibility to the water’s edge.” Open spaces within the plan area include McCovey Cove, Willie Mays Plaza and South Beach Harbor Park; Brannan Street Wharf (planned); Rincon Park, Justin Herman and the Ferry Building Plazas; Pier 7; Sydney G. Walton Square; Levi’s Plaza; and the Maritime National Historical/Aquatic Park. Additionally, the

¹⁴ *Folsom Street Park Community Plan Exemption and Mitigated Negative Declaration*, Case File No. 2009.1163E. The file is available for review at the Planning Department, 1650 Mission Street, Suite 400.

¹⁵ The Mission Area Plan, p. 69, defines “green connector streets” as streets with “wider sidewalks, places to sit and enjoy, significant landscaping and gracious street trees that would provide linkages to between larger open spaces and diffuse the recreational and aesthetic benefits of these spaces into the neighborhood.” The Area Plan is available for review on the Planning Department’s website at <http://www.sfplanning.org> or in Case File No. 2004.0160E at the Planning Department, 1650 Mission Street, Suite 400.

portion of the Embarcadero within the plan area also serves as the San Francisco Bay Trail, a recreational corridor that, when complete, would encircle San Francisco and San Pablo Bays with a continuous 500-mile network of bicycling and hiking trails. The Bay Trail would connect the shoreline of all nine Bay Area counties, link 47 cities, and cross the major toll bridges in the region. The draft ROSE Update policies, particularly Policy 2.4, calling for “support[ing] the development of signature public open spaces along the shoreline” correspond to the overarching objectives of the Waterfront Area Plan and would not, in and of themselves, result in obvious conflicts that would result in adverse environmental effects.

Rincon Hill

Rincon Hill is south of the Financial District and Transbay Terminal area, and north of the South Beach neighborhood. It is bounded generally by Folsom Street, the Embarcadero, Bryant Street, Beale Street, the Bay Bridge approach and Essex Street. The Rincon Hill Plan aims to transform the area into a mixed-use downtown neighborhood with substantial amounts of housing, while providing the full range of services and amenities that support urban living. In 2012, Emerald Park located on Harrison and Fremont streets was opened. It was built by the developer of the 333 Harrison development project and is available to the public through an irrevocable conservation easement, with the Parks Alliance as steward. As of 2013, parks and recreational facilities are limited in Rincon Hill, with a number of spaces located outside the district (e.g., Rincon Point Park and a recently-completed dog run on the north side of Bryant Street) or in the planning phases (e.g., a proposed neighborhood park near First and Harrison Streets). Additionally, a mini-park on Guy Place Street, was called for in the Rincon Hill Streetscape Plan, and is now funded and is starting planning, and design phases. The Area Plan’s objective also calls for improvements to streets, and creation of linear parks (Living Alleys), which are generally consistent with the objectives and policies in the draft ROSE Update and also the Better Streets Plan. The draft ROSE Update would not conflict with the open space objectives in the Rincon Hill Plan.

Showplace Square/Potrero Hill

The geographic area of the Showplace Square/Potrero Hill Area Plan includes the area roughly bounded to the east by Interstate 280, to the south by 26th Street, to the west by Potrero Avenue, and to the north by Bryant Street. Parks and recreation spaces include Jackson Playground, McKinley Square, Potrero Playground, Potrero del Sol Park and the Potrero Hill Recreation Center. Showplace Square’s history as an almost exclusively industrial area has meant that this area has comparatively little access to open space as compared with the rest of the city. An analysis prepared for the Eastern Neighborhood planning process¹⁶ found that a total of about 4.0 acres of new open space should be provided in this area to accommodate expected growth. Thus, the area plan proposes providing at least one new open space in the area (e.g., possibly at the 16th and Irwin public plaza as well as open space proposed on the Daggett Street right-of-way approved as part of the 1000 16th Street mixed-use development),¹⁷ in addition to widened

¹⁶ *San Francisco’s Eastern Neighborhoods Needs Assessment*, Seifel Consulting, Inc. This document was prepared as a background report for the Eastern Neighborhoods Rezoning and Area Plans Project and is available for review in Case File No. 2004.0160E at the Planning Department, 1650 Mission Street, Suite 400.

¹⁷ For more information see 1000 16th Street Final Environmental Impact Report (FEIR) in Planning Department Case File No. 2003.0527E. The FEIR is available for review on line at www.sfplanning.org.

sidewalks with pocket parks and green streets. The Showplace Square/Potrero Hill Area Plan's open space and recreation policies are generally consistent with the ROSE Update policies that call for "prioritize acquisition of open space in high needs areas" (Policy 2.1) and "Assure that privately developed residential open spaces are usable, beautiful, and environmentally sustainable" (Policy 2.11).

Van Ness Avenue

Van Ness Avenue is situated in the valley between Nob and Russian Hills and Pacific Heights. The Van Ness Avenue plan area is encompassed by multiple neighborhoods (including the Downtown, Western Addition, Marina, and Northeast neighborhoods) and entails the full length of Van Ness Avenue and the entirety of one block to its east and west generally from Redwood Street along its south to Bay Street on its north. Its primary focus is to promote the continuation of existing commercial uses and the addition of substantial new housing with densities compatible with the existing character that reinforces topography and urban pattern. There is one park and recreational/cultural facility, the San Francisco National Maritime Historical Park, within (and also just outside of) the Van Ness Avenue Area Plan along its northern-most boundary. The park includes a fleet of historic vessels, a visitor center, a maritime museum, a library/research facility and a 1,850-foot municipal pier that provides public access to San Francisco Bay. The Van Ness Avenue Plan Policy 2 calls for "supporting the National Park Service plans for improvements of the area within the boundaries of the Golden Gate National Recreation Area (GGNRA)." This policy is in line with Policy 3.2 in the existing ROSE ("Maintain and improve the quality of existing shoreline open space.") and the corresponding Policy 1.4 in the draft ROSE Update, "Maintain and repair open spaces to modern maintenance standards." The draft ROSE Update's objectives and policies would not conflict with the Van Ness Avenue Area Plan.

Western Shoreline

The geographic area covered by the Western Shoreline Area Plan includes portions of the Great Highway, Golden Gate Park, the Zoo, Lake Merced, Ocean Beach, Sutro Heights Park, the Cliff House, Sutro Baths, Fort Funston, Olympic Country Club, and the Richmond and Sunset Residential neighborhoods. From the early years of the City's history, the coastal beach and cliff areas have been an important recreational and natural resource to City residents and to the Bay Area at large. Open space and recreational resources within the Western Shoreline area include the Olympic Country Club, Fort Funston, Lake Merced, the San Francisco Zoo, Ocean Beach, Sutro Heights Park, and the Cliff House and Sutro Baths.

The Area Plan includes ten subareas with specific policies that address transportation, circulation connectivity and conservation, such as Policy 2: "Provide transit connections amongst the important recreational destinations;" Objective 3: "Enhance the recreational connection between Golden Gate Park and the beach frontage;" Objective 4: "Improve the quality of the Zoo and its relationship to the Coastal Zone recreational system;" Policy 4: "Maintain and improve the physical connection and appearance of the Esplanade between Lincoln Way and the Cliff House;" and Objective 9: "Conserve the nature cliff environment along Fort Funston," among others. The draft ROSE Update, p. 22 states that the Western Shoreline "provides opportunities for enhanced access to the waterfront and recreational opportunities. The SFPUC is currently

exploring ways to improve access to the watershed lands in this area. If additional space becomes available, such as Harding Park, or the San Francisco Zoo, this space should provide improved connections from the neighborhood to the waterfront.”

This concept is advanced by the draft ROSE Update objectives and policies, particularly by those related to Policy 1.5 (“Prioritize the activation of McLaren Park, Ocean Beach, the Blue Greenway and other underutilized significant open spaces.”), Policy 2.4 (“Support the development of signature public open spaces along the shoreline.”), and Objective 4 (“Protect and enhance the biodiversity, habitat value, and ecological integrity of open spaces.”). The policies in the draft ROSE Update would not conflict with the Western Shoreline Area Plan.

Glen Park Community Plan

Glen Park is a small neighborhood located at the southern edge of the hills in the interior of the City, to the south of Diamond Heights and Noe Valley, west of Bernal Heights, and east of Glen Canyon Park. The Plan Area is served by several neighborhood parks and recreational facilities, including the 70-acre Glen Canyon Park, the Walter Haas Playground, Billy Goat Hill Park and Saint Mary’s Playground/Recreation Center. Just outside of the plan area is Dorothy Erskine Park, Arlington Community Gardens, and Fairmont Plaza and Everson Digby lots that provide accessible open space to the public. The plan identifies a number of policies and associated recommended actions that may occur over time, including developing a conceptual landscape design for a greenway along the City-owned Bosworth Street parcels; building and maintaining an interconnected greenway path through the neighborhood; studying the feasibility and benefits of daylighting portions of Islais Creek through Glen Park; redesigning and reconfiguring the Glen Park BART station plaza and potentially adding small “parklets” in the neighborhood through the conversion of on-street parking stalls. The plan was adopted by the Board of Supervisors in February 2013. The policies in the draft ROSE Update would not conflict with the Glen Park Community Plan.

Transit Center District Plan

The Transit Center District Plan (TCDP) is a comprehensive plan for the southern portion of the downtown Financial District, roughly bounded by Market Street, the Embarcadero, Folsom Street, and Third Street. The area includes both private properties and properties owned or to be acquired by the Transbay Joint Powers Authority (TJPA) in and around the adopted Transbay Redevelopment Project Area (a plan for which was adopted in 2005) and the Transbay Terminal. The TCDP seeks to build on its established patterns of land use, urban form, public space, and circulation, and to make adjustments based on forecasting of local and regional job and population growth. The TCDP presents planning policies and controls for land use, urban form, and building design of private properties and properties owned or to be owned by the TJPA around the Transbay Transit Center, and for improvement and management of the District’s public realm and circulation system of streets, plazas, and parks.

City Park, a 5.4-acre park planned to be located on the roof of the Transit Center would be the District’s primary open space. As proposed, the park would be a self-sustaining ecosystem with a variety of both passive and active uses, educational experiences, special events, as well as habitat for local wildlife. Also part of the Transit Center development, Mission Square would serve as the

entrance to the new station at the corner of Fremont and Mission Streets. The square is designed to be a plaza underneath a vaulted glass-and-steel canopy that would include a funicular to lift visitors to the Transit Center Park above. On the block bounded Beale, Main, and new extensions of Tehama and Clementina Streets, the San Francisco Redevelopment Agency (SFRA) plans to build a new 1.1-acre Transbay Park once the Transit Center is operational. The plan also includes other ideas calling for the areas below the bus ramps serving the Transbay Transit Center, which could be improved with recreational amenities, such as sport courts or dog runs, to serve the neighborhood. The plan also includes a new half-acre public plaza at the northeast corner of Howard and Second Streets that would connect the Transit Center Park with the public realm at street level and provide a southern gateway to the Transit Center. Further, the plan includes mechanisms for directing necessary funding from increases in development to these purposes. The TCDP was adopted by the Board of Supervisors in May 2012. The policies in the draft ROSE Update would not conflict with the Transit Center District Plan.

Western SoMa Community Plan

The Western SoMa Community plan area is irregularly shaped and consists of two connected areas: one generally referred to as “north of Harrison Street,” roughly bounded by 13th Street to the east, Bryant Street to the south, Seventh Street to the west, and Minna Street (an alleyway between Mission and Howard Streets) to the north, and the second area, generally referred to as “south of Harrison Street,” roughly bounded by Townsend Street to the south, Fourth Street to the east, Harrison Street to the north and Seventh Street to the west. The Western SoMa Area Plan would amend the Western SoMa Special Use District (SUD) and would implement new planning policies and controls for land use, urban form, building height and design, street network and open space.

The Western SoMa neighborhood has approximately 0.23 acres of public parks serving its 8,363 residents (compared to about 7 acres of open space per 1,000 residents citywide). The plan states that “the need for developing new recreational space in Western SoMa is an imperative for existing and future neighborhood residents, workers and visitors.”¹⁸ As such, the Plan’s objectives pertaining to open space include: identifying new park sites based on public health and environmental recommendations and specific needs and conditions of the neighborhood; prioritizing public realm improvements; enhancing community diversity and pedestrian accessibility, safety and connections to transit; maintaining and developing at-grade yard patterns; promoting new sustainable and ecological open space, including public open space in private parcels, public gardens and public roofs; and measuring the impact of development in the neighborhood, and making it accountable for paying for public benefits. The Western SoMa plan was adopted by the Board of Supervisors in March 2013. The policies in the draft ROSE Update would not conflict with the Western SoMa Community Plan.

¹⁸ *Draft Western SoMa Community Plan*, pg. 7:2. This document is available for review in Case File No. 2008.0877E at the Planning Department, 1650 Mission Street, Suite 400.

Plans and Policies: Draft Area Plans

The following is a brief description of a draft area plan, Central SoMa Plan, which has not yet been adopted and is undergoing environmental review. Adoption of the Central SoMa Plan requires future Planning Commission and Board of Supervisors review and action.

Central SoMa Plan (formerly, Central Corridor Plan)

The Central SoMa Plan is a comprehensive plan for the southern portion of the Central Subway transit line, an extension of the Third Street light rail line, in the South of Market neighborhood. The Plan area encompasses approximately 260 acres, and is bounded by Market Street to the north, Sixth Street to the west, Second Street to the east, and Townsend Street to the south. The project analyzed is the draft Central Corridor Plan (as it was then known) published in April 2013; as well as street network changes throughout the Plan area, including specific designs within, and in some cases extending beyond, the Plan area for the following streets: Folsom, Howard, Harrison, Bryant, Brannan, Third, and Fourth streets. The Central SoMa Plan identifies two height options for the Plan area. One of the primary objectives of the Plan is to propose an expanded network of open space and recreational uses to serve the existing and future population.

The Plan area encompasses an intensely developed urban area, and does not contain large regional park facilities, but does include a number of open spaces, one neighborhood park, and other recreational facilities. There is one existing facility managed by the SFRPD within the Plan area - South Park, located at South Park and Jack London Alley, between Second and Third streets and Bryant and Brannan streets. This is an approximately 1.2-acre, oval-shaped neighborhood park that contains a hummingbird garden, native plantings, benches, and a small playground area. The Plan proposes to develop an inter-connected network of open spaces and recreational facilities to enhance public health and livability within the Plan area and to improve pedestrian and bicycle access to existing recreational opportunities. Open spaces could include recreational amenities such as community gardens, athletic facilities, playgrounds, or other uses. To accommodate existing and future demand from residents as well as employees (e.g., on-site daytime population), the Plan would construct new publicly available spaces as well as a comprehensive pedestrian-friendly network to increase access to existing, new and improved spaces.

Other Plans and Policies

Former Redevelopment Projects

The San Francisco Redevelopment Agency, along with all 400 redevelopment agencies in California, was dissolved on February 1, 2012, by order of the California Supreme Court in a decision issued on December 29, 2011 (California Redevelopment Association et al. v. Ana Matosantos). In response, the City has created the Office of Community Investment and Infrastructure as the Successor Agency to the San Francisco Redevelopment Agency ("Successor Agency"). Under AB 26 and AB 1484, the Successor Agency is authorized to continue to implement three major redevelopment projects that were previously administered by the former Redevelopment Agency: 1) the Mission Bay North and South Redevelopment Project Areas, 2)

the Hunters Point Shipyard Redevelopment Project Area and Zone 1 of the Bayview Redevelopment Project Area, and 3) the Transbay Redevelopment Project Area (collectively, the "Major Approved Development Projects"). The Commission on Community Investment and Infrastructure exercises land use, development and design approval authority for the Major Approved Development Projects and manages the former Redevelopment Agency assets in YBC in place of the former San Francisco Redevelopment Agency Commission.¹⁹

The draft ROSE Update would not conflict with the policies contained in these projects, and the encouragement of new open spaces and recreational uses in appropriate areas would be, on balance, consistent with the open space related goals contained in these plans.

Waterfront Land Use Plan and Open Space Access

The Waterfront Plan was initially adopted by the Port Commission in 1997, defining acceptable uses, policies and land use information applicable to all properties under the Commission's jurisdiction, including the definition of locations for new public-private partnership projects coordinated with major public open space, maritime, and historic preservation improvements along the waterfront. The Design and Access Element of this Plan sets forth policies and site-specific design criteria to direct the location and types of public access and open spaces, public view corridors and urban design along San Francisco's waterfront. The draft ROSE Update would not conflict with the Waterfront Land Use Plan.

San Francisco Better Streets Plan

The Better Streets Plan describes a vision for the future of San Francisco's pedestrian environment and involves adoption of a set of citywide streetscape and pedestrian policies and guidelines to help accomplish this vision. The Better Streets Plan seeks to balance the needs of all City street users and identifies goals, objectives, policies and design guidelines, as well as future strategies to improve the pedestrian realm in San Francisco.

Major concepts covered in the Plan include: (1) pedestrian safety and accessibility features, such as enhanced pedestrian crossings, corner or mid-block curb extensions, pedestrian countdown and priority signals, and traffic calming features; (2) universal pedestrian design incorporating street trees, sidewalk planting, furnishings, lighting, efficient utility location, shared single-surfaces for small streets/alleys, sidewalk and median pocket parks, and temporary and permanent street closures to vehicles; (3) integrated pedestrian/transit functions using bulbouts and boarding islands; (4) enhanced usability of streetscapes for social purposes with reuse of excess street area, creative use of parking lanes, and outdoor restaurant seating; and, (5) improved ecological performance of streets and streetscape greening with incorporation of stormwater management techniques and urban forest maintenance.

In October 2010, the Planning Commission passed a resolution recommendation adoption of the Plan to the Board of Supervisors and in December 2010, the Board of Supervisors approved the Plan, which then became effective in January, 2011. Any Plan-proposed pedestrian realm

¹⁹ Successor Agency to the San Francisco Redevelopment Agency. Available online at <http://www.sfdevelopment.org/index.aspx?page=1>. Accessed February 10, 2014.

improvements would be analyzed in future site-specific street improvement projects, as part of the City's ongoing streetscape/pedestrian realm improvement efforts. The draft ROSE Update would not conflict with the Better Streets Plan.

Mission District Streetscape Plan

The Mission District Streetscape Plan's (or "MDSP") general boundaries are Division Street to the north, U.S. Highway 101 (U.S.-101) to the east, Precita Avenue/Mission Street/San Jose Avenue to the south, and Dolores Street to the west. The MDSP is an overall vision for the streetscape of the Mission District. It includes design framework and detailed policies, and site-specific streetscape improvement projects based on those policies. The MDSP would provide a framework to implement the policies of the Mission Area Plan, which was developed through the Eastern Neighborhoods planning process and adopted in December 2008. The MDSP does not include changes to public open spaces under the jurisdiction of the Recreation and Parks Department. It does, however, consider pedestrian and vehicular connections between such open spaces and the public right-of-ways. The MDSP would involve the implementation of site-specific streetscape improvement projects in the Mission District. These site-specific streetscape improvement projects are divided into two categories based on street type: 1) Alleys and Small Streets Projects; and 2) Streetscape Improvement Projects. Streetscape design elements to be implemented at specific locations under these two categories would include: raised crosswalks for alleys/narrow streets at intersections; chicanes; plaza improvements such as distinctive paving or artwork; permeable paving; new street trees; stormwater planters and other landscape improvements; bollards to demarcate protected pedestrian areas; seating; and pedestrian lighting. Implementation of the draft ROSE Update would not conflict with the Mission District Streetscape Plan.

San Francisco Bicycle Plan

In August 2009, the Board of Supervisors approved the San Francisco Bicycle Plan. The Bicycle Plan includes a citywide bicycle transportation plan and implementation of specific bicycle improvements. The Bicycle Plan includes objectives and identifies policy changes that would enhance the City's bicycle environment. It also describes the existing bicycle route network (a series of interconnected streets in which bicycling is encouraged), and identifies gaps within the citywide bicycle route network that require improvement. The draft ROSE Update includes policies that pertain to circulation as to "Encourage non-auto modes of transportation – transit, bicycle and pedestrian access—to and from open spaces while reducing automobile traffic and parking in public open spaces" (Policy 3.4). These policies are similar to those in the current ROSE that call for "Gradually eliminate[ing] non-recreational uses in parks and playgrounds and reduce automobile traffic in and around public open spaces." (Policy 2.4) The proposed policies and objectives within the ROSE Update would not conflict with the Bicycle Plan.

Golden Gate National Recreation Area Planning

The GGNRA encompasses a number of open space and parklands throughout Marin, San Mateo and San Francisco, including Alcatraz Island, Crissy Field, the Presidio and the majority of the City's public beaches. A major effort that began in 2011 is the Ocean Beach Erosion Control and Vision Planning process (see "Draft Ocean Beach Master Plan," below). The proposed policies

and objectives within the ROSE Update would not conflict with the Golden Gate National Recreation Area Planning efforts.

Golden Gate Park Master Plan

The Golden Gate Park Master Plan was adopted by the Recreation and Parks Commission in October of 1998. The Park Master Plan is a comprehensive planning document that includes general objectives and policies for the park, management strategies, and specific objectives and policies relating to park landscape, circulation, recreation facilities, visitor facilities and concessions, buildings and monuments, utilities and infrastructure, maintenance, operations and special subarea plans. As discussed in the Master Plan, the western portion of the park contains most of its larger meadows, lakes, and relatively natural areas, as well as facilities for activities and sports, and is more pastoral and sylvan than the eastern portion. The existing ROSE Policy 2.10 calls for the development of a Master Plan for Golden Gate Park. Since a Master Plan has been adopted, the current ROSE Policy 2.10 is proposed to be revised to "Support the continued improvement of Golden Gate Park while preserving the beauty of its naturalistic landscape" (draft ROSE Policy 1.4). The proposed policies and objectives within the ROSE Update would not conflict with the Golden Gate Park Master Plan.

Draft Significant Natural Resource Areas Management Plan

The RPD has developed a SNRAMP to address the restoration and management of the remaining aspects of San Francisco's original ecosystem. The SNRAMP contains detailed information on the biology, geology, and trails within 32 Natural Areas, 31 of which are in San Francisco and one (Sharp Park) is in Pacifica. The SNRAMP is intended to guide natural resource protection, habitat restoration, trail and access improvements, other capital projects, and maintenance activities over the next 20 years. The SNRAMP would be implemented by the Natural Areas Program, run by the RPD, and restore and enhance remnant natural areas of the City, while also developing and supporting community-based stewardship of these areas. The program also includes a number of volunteer opportunities to engage students, businesses, groups, and individuals in the stewardship of San Francisco's natural lands. The SNRAMP is currently under environmental review and is scheduled for adoption in 2014. The proposed policies and objectives within the ROSE Update would not conflict with the draft SNRAMP.

The Sustainability Plan

In 1993, the San Francisco Board of Supervisors established the Commission on San Francisco's Environment, charged with, among other things, drafting and implementing a plan for San Francisco's long-term environmental sustainability. The notion of sustainability is based on the United Nations' definition that "a sustainable society meets the needs of the present without sacrificing the ability of future generations and non-human forms of life to meet their own needs." The Sustainability Plan for the City of San Francisco was a result of community collaboration with the intent of establishing sustainable development as a fundamental goal of municipal public policy.

The Sustainability Plan is divided into 15 topic areas, 10 that address specific environmental issues (air quality; biodiversity; energy, climate change and ozone depletion; food and agriculture; hazardous materials; human health; parks, open spaces, and streetscapes; solid

waste; transportation; and water and wastewater), and five that are broader in scope and cover many issues (economy and economic development, environmental justice, municipal expenditures, public information and education, and risk management). Additionally, the Sustainability Plan contains indicators designed to create a base of objective information on local conditions and to illustrate trends toward or away from sustainability. Although the Sustainability Plan became official City policy in July 1997, the Board of Supervisors has not committed the City to perform all of the actions addressed in the plan. The Sustainability Plan serves as a blueprint, with many of its individual proposals requiring further development and public comment.

The Sustainability Plan includes four goals to create a sustainable civic landscape for San Francisco residents. The first goal is to provide attractive and numerous “vegetated oases and tree-lined streets.” This goal includes an objective of providing a neighborhood park or open space within a 10-minute walk of every home, as well as an action calling for expansion of parks for broader public use to create new uses in underserved communities. The second goal is to maintain these vital resources. Goals 3 and 4, described as the basis of adequate maintenance, are to provide additional funding and to expand public participation, respectively. The draft ROSE Update includes policies that pertain to sustainability as to “Preserve, protect and restore local biodiversity” (Policy 4.1) and “Include environmentally sustainable practices in construction, renovation, management and maintenance of open space and recreation facilities” (Policy 4.4). The draft ROSE Update would not conflict with the Sustainability Plan.

The Climate Action Plan for San Francisco

In February 2002, the San Francisco Board of Supervisors passed the Greenhouse Gas (GHG) Emissions Reduction Resolution (Number 158-02) committing the City to a GHG emissions reduction goal of 20 percent below 1990 levels by the year 2012. In September 2004, the San Francisco Department of the Environment and the SFPUC published the Climate Action Plan for San Francisco: Local Actions to Reduce Greenhouse Gas Emissions.²⁰ The Climate Action Plan provides the context of climate change in San Francisco and examines strategies to meet the 20 percent greenhouse gas reduction target. Although the Board of Supervisors has not formally committed the City to perform the actions addressed in the Plan, and many of the actions require further development and commitment of resources, the Plan serves as a blueprint for GHG emission reductions, and several actions have been implemented or are now in progress. The General Plan ROSE Update, in promoting new open spaces, would not conflict with the goals of the Climate Action Plan for San Francisco.

Draft Urban Forest Plan

The Draft Urban Forest Plan has been prepared and released in January 2014. The Plan was prepared by the Planning Department in coordination with the Department of Public Works. The plan promotes San Francisco’s urban forest with a focus on street trees and identifies policies and strategies to proactively manage, grow and protect the City’s street tree population. The draft

²⁰ San Francisco Department of the Environment and San Francisco Public Utilities Commission, *Climate Action Plan for San Francisco, Local Actions to Reduce Greenhouse Emissions*, September 2004.

ROSE Update, including Policy 3.6 to “Maintain, restore, expand and fund the urban forest,” would not conflict with the draft Urban Forest Plan.

In addition to the plans presented above, environmental plans and policies, like the Bay Area 2010 Clean Air Plan (CAP), directly address physical environmental issues and/or contain standards or targets that must be met in order to preserve or improve specific components of the City’s physical environment. The draft ROSE Update would not obviously conflict with those plans.

Other Citywide Policies and Studies

Proposition C and the Recreation and Park Acquisition Policy

In 2000, San Francisco voters approved Proposition C, extending the Open Space Fund that is used to finance acquisitions and capital improvements for the RPD. The legislation created an annual set-aside of two and one-half cents for each one hundred dollars assessed valuation from the property tax levy. The Open Space Fund is funded through Fiscal Year 2030-2031. The legislation stipulates that at least five percent of the revenue raised through the set-aside be allocated to new land acquisition. In 2006, the RPD, at the request of the Recreation and Parks Commission, published the Recreation and Park Acquisition Policy to provide clear guidelines for the expenditure of acquisition funds under the Recreation and Park Commission’s jurisdiction, followed by a comprehensive revision in 2011 which created a clear guidebook for the public and the department to the latest process and acquisition policies

The first policy in this document is to prioritize acquisition in areas with high needs as well as areas with park distribution deficiencies. These criteria align with the criteria used for Recreation and Open Space Element Map 6, which identifies priority renovation and acquisition areas. Maps 4A to 4C illustrate each of the variables used including: population, density, age, and income. The distribution deficiency is illustrated in Maps 3A to 3C.

Recreation Assessment Report

In August 2004, the RPD published a *Recreation Assessment Report* that evaluates the recreational needs of San Francisco residents. Nine service maps were developed for the report. The service area maps were included to help RPD staff and key leadership assess where services are offered, how equitable the service delivery is across the City, and how effective the service is in serving the needs of key demographic groups – families with children, the elderly and low-income households.

Proposition B: Clean and Safe Neighborhood Parks Bond

As part of the City’s 10-year Capital Plan, the RPD and the Port introduced a parks and open space general obligation capital bond (“Proposition B”) on the November 2012 ballot to address the capital needs of the City’s open space system. The 2012 Bond gave the department an additional \$195 million to continue capital projects for the renewal and repair of its parks, recreation, and open space assets. This Bond includes funding for 15 neighborhood parks, which were determined through a comprehensive outreach process in the preceding year. These park improvement projects include: neighborhood parks selected based on community feedback, their

physical condition, the variety of amenities offered, seismic safety risk, and neighborhood density, waterfront open spaces, failing playgrounds, investments in Golden Gate Park, Lake Merced, and McLaren Park, as well as Community Opportunity Fund, as well as forestry, trails, and water conservation.

Proposition M: the Accountable Planning Initiative

In November 1986, the voters of San Francisco approved Proposition M, the Accountable Planning Initiative, which added Section 101.1 to the *Planning Code* to establish eight Priority Policies. These policies, and the subsection of Section E of this Initial Study addressing the environmental issues associated with the policies, are: (1) preservation and enhancement of neighborhood-serving retail uses; (2) protection of neighborhood character (Topic 1, Land Use and Land Use Planning, Question 1c); (3) preservation and enhancement of affordable housing (Topic 3, Population and Housing, Question 3b, with regard to housing supply and displacement issues); (4) discouragement of commuter automobiles (Topic 5, Transportation and Circulation, Questions 5a, 5b, and 5f); (5) protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership (Topic 1, Land Use and Land Use Planning, Question 1c); (6) maximization of earthquake preparedness (Topic 14, Geology and Soils, Question 14a through 14d); (7) landmark and historic building preservation (Topic 4, Cultural Resources, Question 4a); and (8) protection of open space (Topic 9, Wind and Shadow, Questions 9a and 9b; and Topic 10, Recreation, Questions 10a and 10c).

Prior to issuing a permit for any project which requires an Initial Study under the CEQA, prior to issuing a permit for any demolition, conversion, or change of use, and prior to taking any action that requires a finding of consistency with the General Plan, the City is required to find that the proposed project or legislation would be consistent with the Priority Policies. As noted above, the consistency of the proposed project with the environmental topics associated with the Priority Policies is discussed in Section E, Evaluation of Environmental Effects, of this Initial Study, providing information for use in the approval for the proposed project.

The consistency of the ROSE Update with the environmental topics associated with the Priority Policies is discussed in Section E, Evaluation of Environmental Effects, which provides information for use in the case report for ROSE Update. The case report and approval motions will contain the Planning Department's comprehensive project analysis and findings regarding consistency of the ROSE General Plan Amendment with the Priority Policies.

Approvals Required

After completion and adoption of the environmental review document by the Planning Commission, the approvals required for the draft 2013 ROSE Update are as follows:

- Planning Commission General Plan amendment initiation, with the Commission's recommendation of approval, approval with modification, or rejection of the draft ROSE Update to the Board of Supervisors. The Planning Commission must find that public necessity, convenience and general welfare require the proposed amendment.

Recommendation for rejection of a proposed amendment by the Planning Commission can be appealed to the Board of Supervisors.

- Board of Supervisors Ordinance adopting the draft ROSE Update.

D. SUMMARY OF ENVIRONMENTAL EFFECTS

The proposed project could potentially affect the environmental factor(s) checked below. The following pages present a more detailed checklist and discussion of each environmental factor.

- | | | |
|---|--|---|
| <input type="checkbox"/> Land Use | <input type="checkbox"/> Air Quality | <input type="checkbox"/> Biological Resources |
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Greenhouse Emissions | <input type="checkbox"/> Geology and Soils |
| <input type="checkbox"/> Population and Housing | <input type="checkbox"/> Wind and Shadow | <input type="checkbox"/> Hydrology and Water Quality |
| <input type="checkbox"/> Cultural and Paleo. Resources | <input type="checkbox"/> Recreation | <input type="checkbox"/> Hazards/Hazardous Materials |
| <input type="checkbox"/> Transportation and Circulation | <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Mineral/Energy Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Public Services | <input type="checkbox"/> Agricultural and Forest Resources |
| | | <input type="checkbox"/> Mandatory Findings of Significance |

This Initial Study examines the project to identify potential effects on the environment. All items on the Initial Study Checklist that have been checked "Less than Significant Impact," "No Impact" or "Not Applicable" indicates that, upon evaluation, staff has determined that the draft ROSE Update could not have a significant adverse environmental effect relating to that topic. A discussion is included for those issues checked "Less than Significant Impact" and for most items checked with "No Impact" or "Not Applicable." For all items checked "Not Applicable" or "No Impact" without discussion, the conclusions regarding potential significant adverse environmental effects are based upon field observation, staff experience and expertise on similar projects, and/or standard reference material available within the Department, such as the Department's Transportation Impact Analysis Guidelines for Environmental Review, or the California Natural Diversity Database (CNDDDB) and maps, published by the California Department of Fish and Wildlife (CDFW).

On the basis of this study, the draft ROSE Update would not result in adverse physical effects on the environment; all issues are discussed in Section E below. Cumulative impacts are also discussed in Topic E-19 Mandatory Findings of Significance, beginning on p. 138 in this Initial Study.

E. EVALUATION OF ENVIRONMENTAL EFFECTS

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
1. LAND USE AND LAND USE PLANNING-- Would the project					
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial impact upon the existing character of the vicinity?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact LU-1: Implementation of the draft ROSE Update would not physically divide established communities. (Less than Significant)

There are 220 parks, open spaces and recreational facilities located throughout the City comprising over 5,890 acres, or about 23 percent of the City's total land area. Some of these facilities are located in residential areas (e.g., Koshland Park, Buena Vista Park, Alamo Square, and McCoppin Square); some are located in, or border on, commercial mixed-use areas (e.g., Patricia's Green, Washington Square, Portsmouth Square, and South Park); some are in transitional industrial neighborhoods (e.g., Esprit Park), on the City's waterfront edge, or in the City's natural areas (e.g., Ocean Beach, Presidio, Aquatic Park, Maritime National Historic Park, Rincon Park, India Basin Shoreline Park, and Glen Canyon Park). Under implementation of the draft ROSE Update, the City's parks, open spaces and recreational facilities are expected to continue in their established locales and interrelate with their surrounding land uses in the future as they currently do, and the draft ROSE Update policies would not physically divide existing communities.

The draft ROSE Update's objectives and policies would not eliminate existing recreational facilities. Instead, the draft policies seek to ensure that all of the City's parks and open spaces are high performing and satisfactorily maintained, and are part of a unified and connected open space system that provides a high level of service to their users with numerous amenities. As explained in the Open Space Framework and in the draft ROSE Update, the City would retain existing parks and open spaces (e.g., Policy 1.4) and develop new spaces over time in high needs areas consistent with residential growth, overall demand and other socio-economic factors (e.g., high-needs areas where there is a combination of high density, high percentages of children, seniors, and households with low incomes, etc. as discussed in Policy 2.1). The draft ROSE Update's policies would therefore help better connect parks and recreational facilities to the communities they serve rather than divide them.

As such, the ROSE Update policies and its implementing measures would not disrupt or divide neighborhoods.

Impact LU-2: The draft ROSE Update would not conflict with applicable land use plans, policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect. (No Impact)

As discussed under *Subsection C. Plans and Policies* of this Initial Study, the draft ROSE Update objectives and policies would not conflict with the General Plan, its Elements, Area Plans or pertinent sections of the Code or other regulations or programs so as to cause substantial, adverse environmental effects. In addition, the draft ROSE Update would also not conflict with other plans, policies or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Roughly one-half of the objectives and policies in the draft ROSE Update (e.g., 23 of the 39 total policies) correlate to existing policies and objectives in the current ROSE, and promote similar policies to those in the existing ROSE. In instances where the draft ROSE Update introduces new objectives and policies, these generally relate to sustainability, management, and environmental stewardship, such as Objective 4 (“Protect and enhance the biodiversity, habitat value, and ecological integrity of open spaces”) and subordinate policies (e.g., Policies 4.1, 4.2, and 4.3), Objective 5 (“Engage communities in the stewardship of their recreation programs and open spaces”) and management, Objective 6 (“Secure long-term resources and management for open space acquisition, operations and maintenance.”). Implementation of these objectives and policies would not result in conflicts that would cause substantial adverse physical effects.

Impact LU-3: The draft ROSE Update would not have a substantial impact upon the City’s existing character. (Less than Significant)

The character of existing parks, open spaces and recreational facilities is defined by the physical attributes, activities and uses that occur at specific locations and how these spaces physically relate to their local communities. The City’s parks and open spaces afford a variety of opportunities for recreation and respite including walking paths, hiking, sports facilities, open grass areas for lounging and relaxation, dog runs, playgrounds, cultural attractions, guest amenities and facilities, and events as described in the Environmental Setting of this Initial Study. Draft ROSE Update Objective 1 calls for “Ensure a well-maintained, highly utilized, and integrated open space system.” Draft ROSE Policy 1.1 encourages “the dynamic and flexible use of existing open spaces and promote a variety of open space uses, where appropriate,” which is similar to Policy 4.1 in the current ROSE that focuses on making “better use of existing facilities.” While no specific projects are currently proposed, the draft ROSE Update presents the general type of activities that could be considered in the context of proposed Policy 1.1 in the future including the following options:

- Provide recreational opportunities that respond to user demographics and emerging recreational needs.
- Include innovative community-driven uses such as food production, education, and improved streetscaping.

- Design open spaces that include both active programming and passive uses in tranquil spaces.
- Provide programming for healthy and active lifestyles.
- Add user amenities such as concessions that cater to and attract visitors.
- Expand opportunities for temporary uses such as festivals, art, performances, and farmers markets.
- Allow active engagement with natural areas through public access trail, wildlife observation, birding, and educational displays and programs.
- Increase cultural programming and activities based on neighborhood need and interest.
- Provide spaces and structures that encourage unstructured natural play.

The above uses are considered potential ancillary activities to primary park and recreational uses. As described in the draft ROSE (p. 9), these spaces should be “redesigned to better serve the needs of the surrounding neighborhood, while ensuring a flexible design to adapt to changing neighborhood needs over time.” As described in the Environmental Setting section of this Initial Study, a large number and wide variety of these types of ancillary uses, concessions, special events and activities currently take place in the City’s parks, and are expected to continue to occur in the future. Any future proposals that encompass the above types of activities would be subject to RPD’s permitting requirements and covenants, as well as to project-specific environmental review, if any such specific proposal is determined to have the potential to result in physical environmental effects.

The draft ROSE Update also includes Policy 1.3 “Preserve existing open space by restricting its conversion to other uses and limiting encroachment from other uses, assuring no loss of quantity or quality of open space.” This policy is similar to existing ROSE Policy 2.2, “Preserve existing open space.” This policy ensures that the character of parks and their surrounding vicinities are not adversely altered through conversion to another land use. When future proposals occur, the draft ROSE Update sets forth the following procedures and criteria for reviewing potential proposals for new or expanded buildings and uses in parks:²¹

Proposals for Non-recreational Uses on RPD Land

Decisions related to non-recreational uses on RPD land shall conform to the San Francisco Charter Section 4.113. The Charter requires a vote of the electors for park property to be sold or leased for non-recreational purposes or to build any structure for non-recreational purposes on park property.

Proposals for Permanent New or Expanded Recreation and Cultural Buildings, and Supporting Facilities on RPD Land

The draft ROSE Update, Policy 1.3, sets forth the following criteria for permanent new recreation and cultural buildings and supporting facilities in existing parks and open spaces:

²¹ The listed criteria comprise the key open space and recreation criteria that the Planning Department uses as part of its “General Plan Referral” review process. These criteria are weighed with others in the General Plan to determine whether an undertaking on public property is, on balance, consistent with the General Plan.

- Facility directly serves and improves the existing open space by supporting better utilization of space while continuing to provide access and respond to the needs of the local community.
- Facility is limited in size. The size will vary by open space, but the size shall be limited to the smallest footprint appropriate and feasible for the proposed use, taking into account the intensity of the use, expected participants and spectators, as well as other relevant factors.
- Facility incurs limited impacts on the existing open space (because of a preponderance of nearby outdoor open space or other factor), or the projected benefits outweigh the impacts.
- A clear rationale exists for siting the facility, articulating the advantages of the proposed site compared to reasonable alternatives.

The draft ROSE Update, Policy 1.3 also notes that, “a loss of open space resulting from approval of the proposed facility should be offset with replacement open space of equal or higher quality.”

New and Expanded Facilities in Non-RPD Open Spaces

Many of the City’s open space sites are under the jurisdiction of public agencies other than the RPD, including the Port, the SFPUC, the Office of Community Investment & Infrastructure, and the Department of Public Works (DPW). Many of these spaces are often intended for public uses other than recreation, so the sites’ role as open space is secondary to the primary use. Draft ROSE Update, Policy 1.3 (p. 11) states that decision-making bodies should analyze all of the following criteria in making their determinations on new and expanded facilities in non-RPD open spaces:

- Facility is necessary to provide the public service of the agency holding the site in question.
- A clear rationale exists for siting the facility, articulating the advantages of the proposed site compared to reasonable alternatives.
- Facility incurs limited impacts on the existing open space (because of a preponderance of nearby outdoor open space or other factor), or the projected benefits outweigh the impacts.

The proposed objectives and policies in the draft ROSE Update would not result in a substantial adverse effect on the City’s parks, recreation and open spaces or the character of the communities surrounding them. As illustrated under Impact LU-3, above, the current procedures for evaluating changes to programming or new or altered uses on public parks would continue, in addition to new criteria, which address off-setting conversion of park/open space property. Moreover, specific future proposals including, but not limited to, those listed above could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

At the policy level, implementation of the Open Space Framework, draft ROSE Update would not adversely affect the character of the City's parks and open spaces. As such, potential land use impacts of the draft ROSE Update are less than significant, both individually and cumulatively.

Impact C-LU: Implementation of the draft ROSE Update, in combination with past, present and reasonably foreseeable future projects, would not have a substantial adverse cumulative impact to land use. (Less than Significant)

As of February 2014, there are no known past, present, or reasonably foreseeable projects in or near parks and open spaces under the jurisdiction of the RPD that would interact with the proposed project to result in cumulative significant land use impacts. Reasonably foreseeable future projects in or near parks and open spaces under the jurisdiction of the RPD include projects related to the 2008 Clean and Safe Parks Bond,²² the 2012 Parks Bond,²³ the SNRAMP, and several athletic field renovations. These projects primarily involve renovation of existing parks and open spaces.

As a policy document, the ROSE would not directly result in physical impacts, and would not be expected to result in indirect impacts that would demonstrably contribute considerably to cumulative impacts from projects affecting or in the vicinity of open space and recreation resources. As discussed above, implementation of the draft ROSE Update would result in less-than-significant land use impacts. Implementation of the draft ROSE Update would not contribute in a cumulatively considerable way to divide an established community or conflict with plans, policies, and regulations. Therefore, the project would not result in any significant cumulative land use impacts.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
2. AESTHETICS – Would the project					
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and other features of the built or natural environment which contribute to a scenic public setting?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

²² SFRPD. 2008 Clean and Safe Parks Bond. Available online at: <http://sfrecpark.org/park-improvements/2008-clean-safe-bond/>. Accessed February 19, 2014.

²³ SFRPD. 2012 Parks Bond. Available online at: <http://sfrecpark.org/park-improvements/2012-bond/>. Accessed February 19, 2014.

<u>Topics:</u>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area or which would substantially impact other people or properties?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Public Resources Code Section 21099(d), effective January 1, 2014, provides that, "aesthetics and parking impacts of a residential, mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment." Accordingly, aesthetics and parking are no longer to be considered in determining if a project has the potential to result in significant environmental effects for projects that meet all of the following three criteria:

- a) The project is in a transit priority area;
- b) The project is on an infill site; and
- c) The project is residential, mixed-use residential, or an employment center.

The draft ROSE Update would not meet the above criteria. In addition, future construction activities that may result from the draft ROSE Update would not meet criterion c) above. Therefore, this checklist considers aesthetics in determining the significance of project impacts under CEQA.

Aesthetic Character

The visual setting of the City is varied, reflecting the unique visual characteristics of its topography, street grids, public open spaces, built environment and distinct neighborhoods. San Francisco's skyline is characterized by a general pattern of densely clustered high-rise commercial development in the downtown core that tapers off to low-rise development at its periphery. This compact urban form signifies the downtown as the center of commerce and activity and produces a downtown "mound," distinctive in views from the City's numerous hills. Outside of the highly commercial and built-up downtown core, much of the City is characterized by unique residential neighborhoods, each of which exhibits its own distinctive visual character. Neighborhoods within the City vary greatly in terms of density, scale, architectural style, and general design pattern.

Parks, open spaces and recreational facilities contribute to neighborhood aesthetic character and in some instances also to the image and identity of the City as a whole. In particular, Golden Gate Park, Lincoln Park, the Presidio, Sutro Heights Park and McLaren Park are some of the City's largest open spaces. Heavily landscaped, the expanse of these parks allows users to experience a green counterpoint in contrast to, and sometimes isolated from, the City's surrounding urban character. Golden Gate Park accommodates a number of the City's premiere cultural institutions, attractions and some concessions in a park setting, including the California Academy of Sciences,

De Young Museum, the Jack Hirose Tea Garden, and the Strybing Arboretum and Botanical Gardens.

The General Plan's Urban Design Element, p. I.5.38 states, "The most satisfying recreation space is close and visible, with a feeling of nature and a variety of facilities for all age groups. Such recreation space may be found on private properties, in neighborhood parks, along the sidewalks and in undeveloped street areas. On a citywide scale, larger recreation facilities that require travel away from home provide an even greater variety of opportunities. On this larger scale, the shoreline of San Francisco Bay has a potential that is not fully used." Situated on the City's edge, Ocean Beach, Sutro Heights Park, Fort Funston, Lincoln Park, the ruins of Sutro Baths; the Palace of the Legion of Honor, Crissy Field with its shoreline promenade trail, beaches, picnic tables, and tidal marsh overlooks; and Candlestick Point State Recreation Area capitalize on their locations by providing water-based recreational activities such as wind surfing, swimming and self-guided walks, as well as expansive views of the Golden Gate and Bay Bridges, Pacific Ocean, and the San Francisco Bay.

The General Plan's Urban Design Element, p. I.5.25 highlights "special characteristics of outstanding and unique areas in Telegraph Hill, Russian Hill, Pacific Heights, Buena Vista and Dolores Heights." Parks in these neighborhoods are often located on the tops of hills or on sloped hillsides (e.g., Pioneer Park, Russian Hill Park, Alta Plaza, Alamo Square, Lafayette Square, Buena Vista Park, Dolores Park, etc.). These spaces generally afford outstanding views of the Bay or the Downtown skyline. The General Plan attributes the high aesthetic quality of these spaces in relation to the neighborhoods surrounding the parks: "When large parks occur at the tops of hills, low-rise buildings surrounding them will preserve views from the park and maintain visibility of the park from other areas of the city."

Washington Square Park, Jackson Square, Franklin Square, Boedekker Park, Portsmouth Square, Union Square, Jefferson Square and the like reflect an urban character, and provide visual relief, public gathering space and respite in contrast to their dense and built up surroundings. These spaces are often characterized by turf or paved plaza areas, some with formal seating; levels of user intensity vary. Neighborhood recreation centers also contribute to the character of the vicinity and often include moderately scaled buildings housing sports or community facilities, some of which surround residential areas, such as the Joe DiMaggio pool and clubhouse in North Beach, the Hamilton Recreation Center in the Western Addition and the Gene Friend Recreation Center in SoMa. In Downtown, high-rises are interspersed with privately-owned, publicly accessible open spaces, which vary in quality, available amenities and intensity of use. Some of these spaces, like Redwood Park, are placid and include redwoods, sculptures and water features. Others are interior spaces used primarily during midday (101 Second Street); some are located on rooftops (Crocker Galleria); while others are heavily used snippets of street space with stand-up tables and seating areas adjacent to food services and transit (One Post Street).

Views

A “viewshed” refers to the visual qualities of a geographical area that are defined by the horizon, topography, and other natural features that render an area its visual boundary and context, which are often both characterized by and contrast with urban development in San Francisco.

Known for its abundance of natural beauty and panoramic views, San Francisco is surrounded on three sides by water and featured by parks, lakes, and vistas. The Pacific Ocean, San Francisco Bay and their respective shorelines are considered by many to be the City’s most lauded natural resources, offering significant opportunities for scenic views. The City’s natural hills and ridges also define neighborhoods and provide contrast to the spacious setting provided by the bay and ocean waters. The City contains many open spaces and landscaped areas whose rich green colors help to further define and identify hills, districts, and places for recreation. These areas include the Presidio, Lake Merced and Golden Gate parks as well as smaller but prominent locations such as Alta Plaza, Lombard Street Hill, and Coit Tower, among others. These varied resources result in scenic viewpoints available at numerous locations from within the City and from approaches to the City.

The City contains many prominent viewsheds. The several roadways approaching and within the City provide views of the cityscape, the Golden Gate and Bay bridges, urban forests such as the Presidio and Golden Gate Park, and important historic or architectural landmarks such as the Palace of Fine Arts, Grace Cathedral, and the Ferry Building. Aside from the waters of the Bay, easterly views in the City are generally urban in character, with high-rise buildings visible at the Civic Center, and in downtown along Market Street.

The areas of the City within the elevated topography of Twin Peaks including Mt. Sutro, Mt. Davidson, Mt. Olympus, Glen Canyon, Buena Vista, and Forest Hill are typically provided with panoramic views of the City. Persons at the top of these inclines enjoy 360-degree views, which include the Bay, the downtown skyline, the Pacific Ocean, the Golden Gate and Bay bridges, and several other San Francisco landmarks and visual resources. Due to the proximity to the ocean and parks and open spaces, westerly views of the City generally appear more natural than those of the east. Low lying areas and valleys, such as Noe Valley, the Castro, Hayes Valley, and Cole Valley benefit from views of surrounding topography, and the hills and ridges themselves are aesthetically pleasing features. Sutro Tower, located southeast of Mt. Sutro, is a dominant part of the skyline in the central part of the City.

The General Plan’s Urban Design Element concerns itself with the physical character of the City and the relationship between people and the environment. Figure 3 illustrates the City’s important vistas to be protected according to the General Plan. The vistas are located throughout the City in areas of higher elevation or adjacent to the ocean or bay in areas including Buena Vista Park, Potrero Hill, Grand View Park, Bayview Park, and Alta Plaza Park. These parks and open spaces provide urban relief and views of the surrounding topography. Furthermore, the General Plan, p. I.5.2 states that water is a primary component of the City’s pattern and includes “the Bay and the Ocean, which are boundaries for the City and a part of its climate and way of life. The water is open space, a focus of major views and a place of human activity.” Merced

Heights and Ocean View take in views of the Pacific Ocean, Lake Merced and Harding Park to the West, and the northern slope of San Bruno Mountain to the south. San Francisco Bay, Treasure Island, and the Bay Bridge can be seen from the elevated areas atop Bernal Heights Park, McKinley Square, Bayview Park, and Twin Peaks.

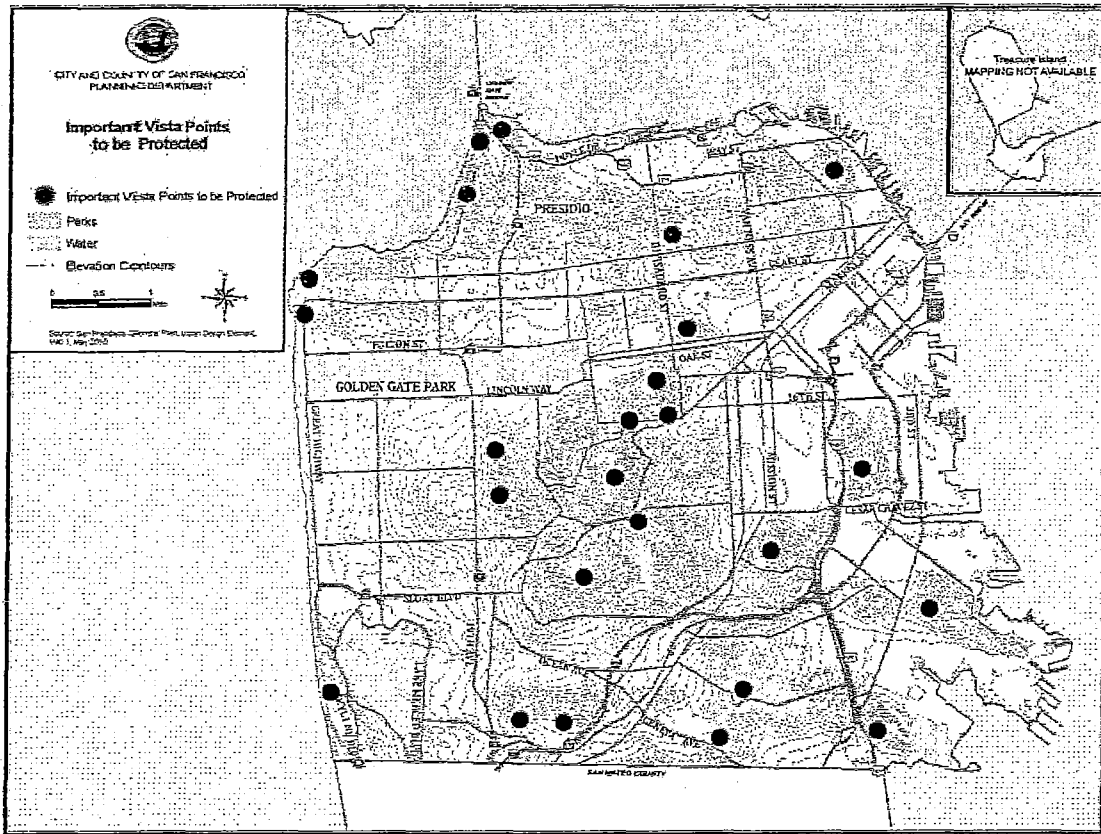


Figure 2: Important vistas to be protected

Impact AE-1: The draft ROSE Update would not have a substantial adverse effect on scenic vistas or damage scenic resources. (Less than Significant)

A review of the objectives and policies in the proposed draft ROSE Update (see Table 1, beginning on p. 5) indicate that none would have the potential to directly alter scenic vistas or damage scenic resources. Indirect effects associated with implementation of Policy 1.1: "Encourage the dynamic and flexible use of existing open spaces and promote a variety of open space uses, where appropriate;" Policy 1.2: "Prioritize renovation of highly-utilized open spaces and in high needs areas;" and Policy 1.7: "Support public art as an essential component of open space design" could result in new uses, structures, public art or landscaping that may be visible from within or along publicly-accessible perimeters of parks or open spaces, and may consequently change views of, or from, these parks and open spaces. This impact is not considered significant based on the fact that corresponding policies currently exist in the ROSE

that direct the City to: "Make better use of existing facilities" (Policy 4.1) and "Renovate and renew the City's parks and recreational facilities" (Policy 4.3). Furthermore, as discussed under LU-3, review procedures currently exist that regulate potential physical alteration, including new buildings and ancillary uses, in parks and open spaces. Therefore, the degree of potential physical change associated with these policies is considered minimal, because these policies reflect a continuation of existing policies and therefore a continuation of existing visual conditions.

Streets contribute substantially to open space in the City. The often regular, rectilinear street grids act as open, long-range view corridors through many of the City's neighborhoods. Policy 3.1 calls for "Creatively develop[ing] existing publicly-owned right-of-ways and streets into open space," which builds on existing Policy 4.7 that calls for "Provid[ing] open space to serve neighborhood and commercial districts." The effect of this policy, if carried out as described on pp. 33-34 of the draft ROSE Update, could be that certain streets may be altered to accommodate additional landscaping and "living streets" treatments, which may include new pedestrian seating areas, special pavers, and additional landscaping, which would be guided according to the street-typologies in the Better Streets Plan. Because trees are common elements in viewsheds along the perimeters of city streets, additional greening efforts that could occur associated with this policy or related implementation actions would not have a substantial, adverse effect on views.

The policies in the draft ROSE Update would not alter or otherwise amend existing height districts, typically designated as "OS Height and Bulk Districts" on Zoning Maps, which establish height districts open spaces and parks. As described in the Plans and Policies section in this Initial Study, "the height and bulk of buildings and structures are determined in accordance with the objectives, principles and policies of the General Plan, and no building or structure or addition thereto shall be permitted unless in conformity with the General Plan. The inclusion of land in Open Space Districts is intended to indicate its principal or exclusive purpose as open space, with future development of any character strictly limited." The policies would also not conflict with or adversely affect scenic vistas, specifically related to the "special characteristics of outstanding and unique areas in Telegraph Hill, Russian Hill, Pacific Heights, Buena Vista and Dolores Heights" as described in the Urban Design Element, because the policies would not affect the "low-rise buildings surrounding [outstanding and unique areas, and thus would]...preserve views from the park and maintain visibility of the park from other areas of the city."

Based on the above, the draft ROSE Update's policies and objectives would not have a substantial adverse effect on scenic vistas or damage scenic resources, thus this impact is considered less than significant.

Impact AE-2: The draft ROSE Update would not degrade the City's aesthetic character. (Less than Significant)

As discussed in the Environmental Setting of this Initial Study, the City's parks, open spaces and recreational facilities are diverse and provide a variety of amenities and activities to City residents and users. Each space has its own unique aesthetic character, depending on the size,

location, topography, type of vegetation and activities provided at the facility. Some spaces are characterized by formal spatial arrangements in urban settings (e.g., Civic Center Plaza, Justin Herman Plaza, etc.), while other spaces are characterized by their natural settings, with informal programming for passive uses (e.g., Kite Hill, Bernal Heights Park). Size, programming and type of amenity notwithstanding, the General Plan's Urban Design Element, p. I.5.49 states, "The more visible the recreation space is in each neighborhood, the more it will be appreciated and used."

The Urban Design Element underscores "Opportunities for Recreation," based on the following policies: "Provide convenient access to a variety of recreational opportunities" (Policy 8); "Maximize the use of recreation areas for recreation purposes." (Policy 9); "Encourage or require the provision of recreation space in private development." (Policy 10); and "Make use of street space and other unused public areas for recreation" (Policy 11). These policies relate to existing ROSE Policy 4.1, "Make better use of existing facilities;" Policy 4.5, "Require private usable outdoor open space in new residential development;" and Policy 4.6, "Assure the provision of adequate public open space to serve new residential development." As stated above, the level of activity, specific location of the park or recreational facility, its level of maintenance, and its relation to the surrounding setting, defines the aesthetic character of a particular park or open space. The Open Space Framework, the draft ROSE Update's policies, as illustrated in Table 1 of Project Description, do not represent a substantial departure from the existing policy context.

As described under Impact LU-3, the draft ROSE Update proposes to continue existing Planning Department review criteria through the General Plan referral process²⁴ that would address proposals for new, altered and/or expanded structures in parks and open spaces. These criteria call for future facilities to be limited in size, to demonstrate how surrounding open space would be improved by any potential new structures or expansions, and to provide additional open space in the form of activated programming, enhanced streetscaping, or to return space currently used by a structure to open space, if feasible.

Any future projects related to the implementation of the draft ROSE Update policies that include the alteration, demolition, or construction of buildings, recreational spaces, or open spaces would be subject to project-specific environmental review to evaluate potential impacts to aesthetic character. Because the draft ROSE Update's policies and objectives would not be considered to

²⁴ "General Plan Referral" is a review process established by San Francisco Charter Section 4.105 and Sections 2A.52 and 2A.53 of the San Francisco Administrative Code for certain types of projects. The Planning Department or Planning Commission is required to review the project and determine whether a project is in conformity with the General Plan, prior to Board of Supervisors' consideration of an ordinance or resolution approving the project. The types of projects that trigger submittal of a General Plan Referral application include: 1) property acquisition, sale or lease by the City; 2) ordinances concerning the extension, widening, narrowing, removal, relocation, vacation, abandonment, sale or change in the use of any public way, transportation route, ground, open space, building, or structure owned by the City and County; 3) subdivisions of land within the City and County; 4) projects for the construction, improvement of, or demolition of City-owned buildings or structures within the City and County; 5) programs that link the General Plan to the allocation of local, state and federal resources, the City's annual capital expenditure plan, six-year capital improvement program, a capital improvement project or a long-term financing proposal, general obligation or revenue bonds or nonprofit corporation proposals; 6) project plans for public housing, or publicly assisted private housing in the City and County; 7) proposed Redevelopment project plans within the City and County; or 8) substantial change to the above.

degrade the existing aesthetic character of the City's parks, open spaces and other recreational facilities, this impact is considered to be less than significant.

Impact AE-3: The draft ROSE Update would not create new sources of substantial light or glare which would substantially impact other people or properties. (Less than Significant)

Existing recreation and park facilities, such as clubhouses, tennis and basketball courts, and some fields where permitted games are held, currently have night-lighting.²⁵ Light standards generally include shielded lamps, with the cone of light focused on the play area to reduce light spillover onto adjacent areas. The RPD illuminates these spaces until about 10 p.m. Cars traveling to, and sometimes through parks (e.g., Golden Gate Park) are also dynamic sources of light and glare during evening hours.

The draft ROSE Update also includes Policy 1.10 to "Ensure that open space is safe and secure for the City's entire population," which addresses, among other things, the provision of clear sightlines; adequate and appropriate lighting for safety and way-finding purposes and increasing park usership to increase "eyes on the park." In addition, City Resolution 9212 prohibits the use of highly reflective or mirrored glass in new construction. New development would be required to comply with this resolution. Based on the foregoing, the objectives and policies in the draft ROSE Update would not result in substantial light and glare impacts on people or properties.

Impact C-AE: Implementation of the draft ROSE Update, in combination with past, present, and reasonably foreseeable future projects, would not have a substantial adverse cumulative impact on aesthetic resources. (Less than Significant)

As of February 2014, there are no known past, present, or reasonably foreseeable projects in or near parks and open spaces under the jurisdiction of the RPD that would interact with the proposed project to result in cumulative significant aesthetics impacts. Reasonably foreseeable future projects in or near parks and open spaces under the jurisdiction of the RPD include projects related to the 2008 Clean and Safe Parks Bond,²⁶ the 2012 Parks Bond,²⁷ the SNRAM, and several athletic field renovations. These projects primarily involve renovation of existing parks and open spaces.

As a policy document, the ROSE would not directly result in physical impacts, and would not be expected to result in indirect impacts that would demonstrably contribute considerably to

²⁵ Permitted fields or other recreation facilities that are illuminated during night-time hours include: Crocker soccer fields and diamond; Excelsior clubhouse; Franklin, Garfield, Jackson, Lang, Rolf Kimball, and Moscone fields; Silver Terrace; Sunset and West Sunset Recreation Centers; the Youngblood Coleman Recreation Center in the Bayview; and Beach Chalet, in the western end of Golden Gate Park. Kezar Stadium is also illuminated at night for special sporting events. Personal communication, Dana Ketcham, Permits and Reservations Manager, Recreation and Parks Department, June 20, 2011. Available for review at the Planning Department, 1650 Mission Street, Suite 400 in Case File No. 2010.0641E.

²⁶ SFRPD. 2008 Clean and Safe Parks Bond. Available online at: <http://sfrecpark.org/park-improvements/2008-clean-safe-bond/>. Accessed February 19, 2014.

²⁷ SFRPD. 2012 Parks Bond. Available online at: <http://sfrecpark.org/park-improvements/2012-bond/>. Accessed February 19, 2014.

cumulative impacts from projects affecting or in the vicinity of open space and recreation resources. As stated above, implementation of the draft ROSE Update would result in less-than-significant effects related to aesthetics. Implementation of draft ROSE Update would not contribute in a cumulatively considerable way to substantially degrade views, damage scenic resources, degrade the existing visual character of the area, or create new sources of substantial light or glare. For the reasons discussed above, the proposed project's impacts related to aesthetics, both individually and cumulatively, would be less than significant.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
3. POPULATION AND HOUSING--					
Would the project					
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing units or create demand for additional housing, necessitating the construction of replacement housing?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

In general, a project would be considered growth-inducing if its implementation would result in a substantial population increase and/or new development that might not occur if the project were not implemented. As of 2010, the U.S. Census Bureau indicates that the City's total population is approximately 805,235 persons.²⁸ The Planning Department routinely prepares projections for the purpose of analyzing plans and projects undergoing environmental review. While the assumptions of these data sets may vary depending on the circumstances surrounding a specific project, the Department recently completed a citywide projection capturing citywide growth expectations by 2030 designed to closely match the recently adopted Association of Bay Area Governments (ABAG) *Projections 2009* target, which take into account local knowledge of projects currently in various stages of the entitlement process, commonly referred to as the development pipeline. Table 3 shows population and housing projections through the horizon year of 2030.

²⁸ U.S. Census Bureau. *State & County QuickFacts, San Francisco County, California*. Available online at <http://quickfacts.census.gov/qfd/states/06/06075.html>. Accessed February 19, 2014.

Table 3: Household Population and Jobs Forecast: 2000-2030

	2000	2005	2030	Growth 2000-2030	Growth 2005-2030
Households	329,700	341,478	403,292	73,592	61,814
Household Population	756,976	783,441	916,800	159,824	133,359
Jobs	642,500	533,090	748,100	105,600	195,010

Sources: ABAG, San Francisco Planning Department, 2011.

Impact PH-1: Implementation of the draft ROSE Update objectives and policies would not induce substantial population growth in San Francisco, either directly or indirectly. (No Impact)

The objectives and policies in the draft ROSE Update address parks, open spaces (including streets) and recreational facilities. As shown in Table 3, above, the City projects growth in overall households, household population, and jobs to occur in the near future. The draft ROSE Update does not include policies or objectives that directly resulting in development of new or renovated housing or fostering economic development, such as jobs.

In recognition of potential population growth in the City, the existing ROSE and draft ROSE Update contain policies that call for the preservation of existing open space (Policy 1.3) as well as policies that call for "Increas[ing] open space to meet the long-term needs of the city and bay region" (Objective 2) in addition to "Prioritize renovation in highly-utilized open spaces and in high needs areas (Policy 1.2)."

The draft ROSE Update would not induce substantial population growth either directly or indirectly. Therefore, the draft ROSE Update would not substantially impact the City's population growth.

Impact PH-2: Implementation of the draft ROSE Update would not displace existing housing units or create demand for additional housing, necessitating the construction of replacement housing. (No Impact)

The draft ROSE Update objectives or policies, similar to those in the existing ROSE, would neither displace existing housing units nor create demand for additional housing. As such, the draft ROSE Update would have no direct or cumulative impacts on population and housing.

Impact C-PH: Implementation of the draft ROSE Update, in combination with past, present, and reasonably foreseeable future projects, would not have a substantial adverse cumulative impact on population and housing. (Less than Significant)

As of February 2014, there are no known past, present, or reasonably foreseeable projects in or near parks and open spaces under the jurisdiction of the RPD that would interact with the proposed project to result in cumulative significant impacts with respect to population and

housing. Reasonably foreseeable future projects in or near parks and open spaces under the jurisdiction of the RPD include projects related to the 2008 Clean and Safe Parks Bond,²⁹ the 2012 Parks Bond,³⁰ the SNRAMP, and several athletic field renovations. These projects primarily involve renovation of existing parks and open spaces.

As a policy document, the ROSE would not directly result in physical impacts, and would not be expected to result in indirect impacts that would demonstrably contribute considerably to cumulative impacts from projects affecting or in the vicinity of open space and recreation resources. As discussed above, implementation of the draft ROSE Update would result in less-than-significant impacts related to population and housing. In addition, implementation of the draft ROSE Update would not contribute in a cumulatively considerable way that would induce substantial population growth and would not displace substantial numbers of people or existing housing units. For the reasons discussed above, the proposed project's impacts related to population and housing, both individually and cumulatively, would be less than significant.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
4. CULTURAL AND PALEONTOLOGICAL RESOURCES—Would the project:					
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5, including those resources listed in Article 10 or Article 11 of the San Francisco Planning Code?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Historical architectural resource impacts are considered to be significant if adoption of the draft ROSE Update would cause a substantial adverse change in the significance of an historical resource (CEQA Section 21084.1). The assessment of potential impacts on "historical resources," as defined by CEQA Guidelines Section 15064.5, is a two-step analysis. First, a determination is made as to whether a Project Site contains an "historical resource" as defined under CEQA. Since the draft ROSE Update is a policy document that affects recreational and open spaces throughout

²⁹ SFRPD. 2008 Clean and Safe Parks Bond. Available online at: <http://sfrecpark.org/park-improvements/2008-clean-safe-bond/>. Accessed February 19, 2014.

³⁰ SFRPD. 2012 Parks Bond. Available online at: <http://sfrecpark.org/park-improvements/2012-bond/>. Accessed February 19, 2014.

the City, the City as a whole, Sharp Park in the City of Pacifica, and Camp Mather in Groveland in Tuolumne County are considered to be the "Project Site." This Initial Study discusses the presence of identified and potential historical architectural resources related to the City's recreational and open spaces. The second step of the historical resource analysis is to determine whether the project could cause substantial adverse changes to historical resources. A substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the historical resource would be materially impaired. Thus, this Initial Study discusses potential impacts of the draft ROSE Update policies to historical resources located within the Project Site.

There are 220 parks, open spaces and recreational facilities located throughout the City comprising over 5,800 acres. A number of these spaces and facilities have been identified, in whole or in part, as historical architectural resources in previous evaluations. These identified resources are listed in or have been found eligible for listing in the National Register of Historic Places (NRHP) or the California Register of Historical Resources (CRHR), designated San Francisco Planning Code Articles 10 and 11 properties, or listed in local adopted registers and surveys (e.g., the *Here Today* survey, adopted as a local register by the Board of Supervisors in 1970). The list of resources within the City's parks, open spaces and recreational facilities includes buildings, structures, objects, sites, historic districts and cultural landscapes.³¹

To illustrate the types of historical resources within the City's recreation and open spaces, Table 4, below, lists the more prominent identified resources.

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³¹ As defined by the National Park Service, a "cultural landscape" is a geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person, or that exhibits other cultural or aesthetic values. There are four general types of cultural landscapes, not mutually exclusive: historic sites, historic designated landscapes, historic vernacular landscapes, and ethnographic landscapes.

Table 4: Listed or Eligible Historic Properties

National Register (listed or eligible)³²	California Register (listed or eligible)	Articles 10 & 11 (listed)
Aquatic Park Historic District	Sharp Park Golf Course (Pacifica)	Alamo Square Historic District
Civic Center Historic District	Lincoln Park Legion of Honor	Civic Center Historic District
Embarcadero Historic District	Duboce Park	Cottage Row Park
Fort Point National Historic Site	Stern Grove	Hallidie Plaza
Golden Gate Park	Glen Canyon Park Recreation Building	Noe Valley Library
Hyde Street Pier		Olympic Country Club, 524 Post Street
Palace of Fine Arts		Sunnyside Conservatory
Presidio of San Francisco		Union Square
San Francisco Ferry Building		Washington Square
Fort Mason		Duboce Park Historic District
Pier 70		

Source: San Francisco Planning Department, 2011.

As noted above, properties formally listed in or found eligible for listing in the National or California Registers and properties listed in Articles 10 and 11 of the Code are considered historical resources for the purposes of CEQA analysis.

Golden Gate Park was added to the Historic Preservation Commission’s Landmark Designation Work Program in 2010. In addition to the previously identified historic resources within the City’s recreational and open spaces, there are also many buildings, structures, objects, sites, historic districts and cultural landscapes over 50 years in age that have not yet been evaluated for historical significance. These properties would require further consultation and project-specific environmental review if future projects proposed their alteration or demolition. The majority of recreational and open spaces – and the buildings, structures, objects, and sites located within them – fall within this unevaluated category of properties and are identified under the Planning Department’s CEQA Review Procedures for Historic Resources and in its Parcel Information Database as “Category B” – properties (Properties Requiring Further Consultation and Review).

³² These structures and districts appear from the California Historic Resources Inventory System (CHRIS) database as having a National Register Status Code (NRSC) of 1 or 2 and are, therefore, automatically included in the California Register.

Impact CP-1: The draft ROSE Update would not have a significant impact on historical architectural resources and cultural landscapes. (Less than Significant)

The draft ROSE Update's objectives and policies seek to ensure that all of the City's parks and open spaces are high performing and satisfactorily maintained, and are part of a unified and connected open space system that provide a high level of service to their users with numerous amenities. About one-half of the objectives and policies in the draft ROSE Update correlate to existing policies and objectives in the current ROSE, meaning that the draft ROSE Update policies are substantially similar to those in the existing ROSE.

As explained in the Open Space Framework and in the draft ROSE Update, the City would continue policies from the existing ROSE to preserve existing parks and open spaces as well as to develop new spaces over time in high needs areas consistent with existing need, population growth, overall demand and other socio-economic factors. Thus, the intent of the draft ROSE Update is to preserve parks and recreational facilities rather than eliminate or reduce them. Furthermore, in instances where new objectives and policies are introduced, these typically relate to sustainability and environmental stewardship (Objectives 4 and 5), as well as funding and management (Objective 6). Implementation of the objectives and policies of the draft ROSE Update would not result in adverse impacts to historical resources since they would not recommend the demolition or reduction of recreational and open spaces and to do not directly involve material changes to buildings, structures, or landscapes.

In some instances, the draft ROSE Update policies inherently align with the Secretary of the Interior *Standards for the Treatment of Historic Resources* and the NPS's *Guidelines for Rehabilitating Cultural Landscapes*. For example, Policy 1.3 calls for preserving "existing open space by restricting its conversion to other uses and limiting encroachment from other uses." This policy is similar to existing ROSE Policy 2.2, "Preserve existing open space." As discussed under Impacts LU-1 and LU-3 of this Initial Study, this policy would ensure that the character of parks and their surrounding areas are not adversely altered, divided or disrupted through conversion to another land use and sets forth procedures and criteria for reviewing potential proposals for new or expanded buildings and uses in parks. In addition to the Planning Department's procedures already in place for the review of historic resources, the above policy ensures an additional layer of protection for known and potential historic resources by preserving existing open spaces that may qualify for listing on the California Register as a cultural landscape or as a contributing landscape feature to a historic property or district.

More specifically related to the protection and preservation of historic resources, the draft ROSE Update includes Policy 1.6, "Support the continued improvement of Golden Gate Park while preserving the beauty of its naturalistic landscape." Golden Gate Park is a historic district and cultural landscape listed on the National Register and it contains several Article 10 Landmarks.³³ The park is historically significant under Criterion A/1 (Events) and Criterion C/3 (Architecture) in the areas of landscape architecture and social history as "one of the pioneering examples of the

³³ Nelson, Douglas. NPS Form 10-900, Golden Gate Park. July 2003, revised June 2004. On file for review at the Planning Department, National Register Historic District Files, 1650 Mission Street, Suite 400, San Francisco.

large urban park in the United States” and as “the first naturalistic landscape park in the west.” The park contains 133 contributing resources and 56 non-contributing resources. The above policy would help ensure the historic characteristics of Golden Gate Park. Implementation of the draft ROSE Update would not result in adverse physical impacts to historical resources in Golden Gate Park.

The draft ROSE Update includes Policy 1.12, “Preserve historic and culturally significant landscapes, sites, structures, buildings and objects;” and Policy 1.13, “Preserve and protect character-defining features of historic resources in City parks, when it is necessary to make alterations to accommodate new needs or uses.” These policies, which primarily reflect the ongoing review mechanism implemented by the Planning Department, would not result in any significant impacts to historical resources.

In addition to the policies cited above, which explicitly include preservation principles in their statements, the draft ROSE Update and accompanying Open Space Framework also include policies that may indirectly result in material changes to recreational and open spaces and the buildings, structures, objects, and sites located therein. In such instances, the Planning Department’s *CEQA Review Procedures for Historic Resources* would require further consultation and project-specific environmental review. In accordance with the Department’s CEQA review policy, any project that involves the exterior alteration or demolition of a property over 50 years of age is required to undergo environmental review that includes an evaluation of the properties’ historical significance and, if a resource is present, an analysis of project impacts. Therefore, any future projects related to the implementation of the draft ROSE Update policies that include the alteration, demolition, or construction of buildings, recreational spaces, or open spaces would be subject to project-specific environmental review that evaluates potential impacts to historic resources. Examples of draft ROSE Update policies that would potentially result in projects that require future environmental review are discussed below:

- Policy 1.5: “Prioritize the activation of McLaren Park, Ocean Beach, the Blue Greenway and other underutilized significant open spaces.” This policy calls for the City to develop these large signature areas as multifunctional open spaces that serve a diverse set of users. Neither McLaren Park nor Ocean Beach have been previously evaluated for potential historical significance; however, some of the other signature open spaces identified on the map on the draft ROSE Update p. 24, such as the Ferry Building plaza and Hunters Point, contain identified historical architectural/structural resources. While many of the policy’s directives pertain to programming of the spaces and would not result in material changes to the properties, others call for physical improvements to the spaces to increase user-friendliness and safety. These changes would not result in adverse impacts to historic resources since they would be maintaining the historic use and character of the spaces; however, such projects would trigger project-specific environmental review that evaluates potential impacts to historic resources.

- Policy 1.3: “Preserve existing open space by restricting its conversion to other uses and limiting encroachment from other uses, assuring no loss of quantity or quality of open space.” In addition to limiting the development of non-recreational uses on existing park

land, this policy restates and amends existing criteria for the review of new or expanded recreational and cultural buildings. The policy acknowledges that the priority goal of retaining outdoor open spaces may not always be met when new recreational facilities are necessary and sets review criteria that are intended to balance these competing needs. While these criteria would reduce the impact of future projects to historic resources by restricting size and requiring the review of alternative sites, such projects would result in material changes to recreational and open spaces. Therefore, such projects would trigger project-specific environmental review that evaluates potential impacts to historic resources.

- Policy 2.4: "Support the development of signature public open spaces along the shoreline." According to the map on ROSE Update p. 24, "planned signature open spaces" are conceptually illustrated at the Ferry Building plaza and at Hunters Point, and "potential signature open spaces are proposed at China Basin and the Central Waterfront." All of these areas contain or are located near identified and potential historic resources. In addition, the policy lists multiple shoreline locations that have not yet been evaluated for historical significance. Improvements to these areas could include linking existing open spaces, completing the Bay Trail system in San Francisco, and the creation of parks and plazas with their associated landscape and hardscape features. Such projects would result in material changes to existing recreational and open spaces and would, therefore, trigger project-specific environmental review that evaluates potential impacts to historic resources.

- Policy 2.5: "Encourage the development of region-serving open spaces in opportunity areas: Treasure Island, Yerba Buena Island, Candlestick and Hunters Point Shipyard." These areas have recently undergone intensive environmental review for development projects unrelated to the draft ROSE Update. Each area contains identified historic resources and any recreation and open space projects related to those development plans were evaluated for potential impacts to historical resources during their independent review. Nevertheless, any new projects related to recreational and open space in these areas would trigger project-specific environmental review that evaluates potential impacts to historical architectural/structural resources.

- Policy 2.6: "Support the development of civic-serving open spaces." This policy specifically addresses those open spaces that surround the Civic Center, which is designated as an Article 10 Historic District consisting of a principal aggregation of monumental buildings around a central open space, with additional buildings extending the principal axis at either end. There are eight major buildings, a group of secondary buildings, three unrealized building sites, and a large plaza within the historic district. The architectural features, formal plan composition and streetscape elements of district that should be preserved and strengthened are also identified in the Civic Center Plan, an Element of the City's General Plan, and in the *Civic Center Urban Design Guidelines* adopted by the Planning Commission pursuant to that plan. Any projects resulting from this policy must comply with these plans, guidelines, and Planning Code provisions in

addition to undergoing project-specific environmental review that evaluates potential impacts to historical architectural/structural resources.

- Policy 2.12: "Expand the Privately-owned Public Open Spaces (POPOS) requirement to new mixed-use development areas and ensure that spaces are truly accessible, usable and activated." The downtown area is rich in historical architectural/structural resources and includes a number of individually listed landmarks as well as Article 11 designated Significant Buildings and Conservation Districts. While some of the existing open spaces and parks in the downtown area have historical significance, such as Union Square which dates to 1850 and is part of the Kearny-Market-Mason-Sutter Conservation District, many of the open spaces are the result of Planning Code requirements adopted in the 1980s. Therefore, many of the downtown open spaces would not be considered to be historically significant due to their relatively recent history. Those spaces that have been determined to be historic resources would undergo separate environmental review as cited above. The remaining spaces primarily serve as a setting to surrounding historic resources. As such, the improvement of these spaces to ensure their continued use would not substantially change their existing character or the setting of historic resources that they abut. Therefore, the policy does not adversely affect historic resources.

- Policy 3.1: "Creatively develop existing publicly-owned rights-of-way and streets into open space." This policy encourages the reconfiguration and/or re-use of rights-of-way and streets within the City and would involve streetscape improvements such as bulb-outs, crosswalk improvements, tree planting, pedestrian lighting, expansion of sidewalks and other landscape elements. In some cases, existing streetscape features may be considered to be individually historically significant or as contributing to the particular character of a historic district. Public right-of-ways also play an integral role in the interpretation and appreciation of individual historic buildings and structures by providing context and setting. Therefore, streetscape improvements should be analyzed for potential effects to the character of individual historic buildings or structures. In keeping with the procedures described above, such projects would be subject to project-specific environmental review that evaluates potential impacts to historical architectural/structural resources.

- Policy 3.3: "Develop and enhance the City's recreational trail system, linking to the regional hiking and biking trail system and considering historic water courses to improve stormwater management." Similar to the discussion under Policy 3.1 above, existing trails may be considered to be individually historically significant or as contributing to the particular character of a historic district, such as those located within the Presidio or Golden Gate Park. While the physical effects of extending these trails systems are likely to be substantially less in comparison to the streets and rights-of-way improvements, there remains a possibility that historical architectural/structural resources could be affected by such future projects. For example, the conceptual Crosstown Trail shown on ROSE Update p. 36 would eventually span from Candlestick Point northeast across McLaren Park, Bernal Hill, Diamond Heights/Twin Peaks, connecting with the Ridge Trail through Buena Vista Park to Golden Gate Park and then to the Presidio. The

majority of the parks and landscapes that the Crosstown Trail would connect are either identified or potential historic resources. Therefore, any new projects related to the implementation of this policy would be subject to project-specific environmental review that evaluates potential impacts to historical architectural/structural resources.

In sum, for the reasons stated above the objectives and policies in the draft ROSE Update would not result in adverse impacts to historical resources since they do not recommend the demolition or reduction of recreational and open spaces and do not directly propose material changes to buildings, structures, objects, sites, historic districts and cultural landscapes. As previously stated, any implementation projects resulting from the draft ROSE Update would be subject to project-specific environmental review. As such, the draft ROSE policies and objectives are considered to have a less-than-significant effect on historical resources, both individually and cumulatively.

Impact CP-2: Implementation of the draft ROSE Update would not adversely affect legally-significant archeological resources. (Less than Significant)

CEQA requires that the effects of a project on an archaeological resource shall be taken into consideration. CEQA recognizes two different categories of significant archeological resources: "unique" archeological resources (CEQA Sect. 21083.2) and archeological resources that qualify as "historical resources" under CEQA (CEQA and Guidelines. 21084.1, 15064.5). Under CEQA, evaluation of an archeological resource as an "historical resource" is privileged over the evaluation of the resource as a "unique archaeological resource," in that, CEQA requires that "when a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource" (CEQA Sect. 15064.5 (c)(1), that is, if the archaeological resource meets one or more of the criteria for listing on the CRHR (Public Resource Code §5024.1, Title 14 CCR, Section 4852):

The resource:

- is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage (Criterion 1);
- is associated with the lives of persons important in our past (Criterion 2);
- embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values (Criterion 3); or
- has yielded, or may be likely to yield, information important in prehistory or history (Criterion 4).

To be eligible for listing to the CRHR under Criteria 1, 2, or 3, an archaeological site must contain artifact assemblages, features, or stratigraphic relationships associated with important events, or important persons, or exemplary of a type, period, or method of construction (CEQA Guidelines §15064.5(a)(1) and (3) and (c)(1) and (2)). To be eligible under Criterion 4, an archaeological site need only show the potential to yield important information (U.S. Department of the Interior 1986). An archaeological resource that qualifies as a "historical resource" under CEQA, generally,

qualifies for listing under Criterion 4 of the CRHR (CEQA Guidelines §15064.5 (a)(3)(D). An archaeological resource may qualify for listing under Criterion 4 when it can be demonstrated that the resource has the potential to significantly contribute to questions of scientific/historical importance.³⁴ Thus, the adoption of the draft ROSE Update would result in adverse effect to a legally-significant archeological resource, if it would cause directly or indirectly as substantial diminution in the informational/research value of the resource. Examples of actions that can directly or indirectly adversely affect archeological deposits are soils excavation, grading or re-contouring of slopes, installation of foundational supports, remediation of hazardous soils, and injection of agents to stabilize subsurface soils. Where archeological deposits are located near or at the existing surface, minor soils disturbing activities may have the potential to substantially adversely affect an archeological resource.

The City has a rich, complex, and an unusually well-preserved archeological record that extends back to nearly 6,000 years before the present (B.P.). Our knowledge of all of the significant historical periods of pre-Modern San Francisco – the Hispanic Period (1776-1846), Yerba Buena Period (1835-1848), the Early and Late Gold Rush Periods (1848-1860), the Victorian Period (1860-1906) – continues to be expanded by the discovery and research of archeological sites associated with these periods.

Archeological resources in San Francisco can be vertically found from as deep as 75 feet below existing grade (CA-SFR-28) to as shallow as at the existing ground surface (Lake Merced Midden). An archeological resource can be as massive in scale as a buried Gold Rush period storehouse (the General Harrison), as complex as representing occupations of several different peoples over a period of 3,000 years CA-SFR-4), as fragile and disperse as a prehistoric lithic scatter site (CA-SFR-113), or as small as a single artifact (CA-SFR-25). Since human occupation and use has occurred throughout the entire northern San Francisco peninsula extending back to geologic/climatic eras when the bay and ocean shorelines were considerably beyond and lower than their current alignments, the archeological record lies, potentially, throughout the City.

Although far from all extant archeological sites have been documented in the City, many archeological sites have been documented in public parks and open spaces, for example: Golden Gate Park, Lincoln Park, Lake Merced Park, the Presidio, Dolores Park, Glen Canyon Park, Ocean Beach, Fort Mason, Potrero del sol Park, U.N. Plaza, Justin Hermann Plaza, Portsmouth Square, etc. Archeological resources documented with the City's parks and open spaces range from buried Gold Rush period storehouses (the William Grey), remains of the 1894 Midwinter Fair, remains of the first and second Presidio, two municipal and two Jewish cemeteries, and many prehistoric sites. Two characteristics of the City's parks and open spaces – their locational desirability and their comparatively low intensity of improvement – may be responsible for a stronger and better preserved archeological record, in general, within the City's parks and open spaces than other areas, since the desirability of the same locations for occupation and use may have been as true in prehistory as at present. Further, comparatively low intensity of development within the City's parks and open spaces would result in comparatively better

³⁴ State of California Office of Historic Preservation, *Preservation Planning Bulletin* No. 5.

preserved archeological deposits than areas of more intense infrastructural and structural development.

Implementation of the objectives and policies of the draft ROSE Update would not result in any adverse effects to archeological resources since they would not directly involve any material change to the physical environment, including subsurface soils that may contain archeological resources. Thus, the potential of the draft ROSE Update to result in any direct effect to archeological resources is less than significant. Implementation of the draft ROSE Update may indirectly result in soils disturbance of subsurface soils containing legally-significant (CRHR-eligible) archeological resources, through implementation of landscape or streetscape and improvements, construction of new parks or recreational facilities or enhanced maintenance activities. Any implementation projects resulting from the draft ROSE Update would be subject to project-specific environmental review, including preliminary archeology review by the Environmental Planning division archeologist, who will evaluate the potential of the project to adversely affect legally-significant archeological resources. Thus, implementation of the draft ROSE Update would result in a less-than-significant effect on archeological resources.

Impact CP-3: Implementation of the draft ROSE Update would not destroy a unique paleontological resource or site or unique geologic feature. (No Impact)

Paleontological resources, or fossils, are the remains, imprints, or traces of once-living organisms preserved in rocks and sediments. Paleontological resources include vertebrate, invertebrate, and plant fossils or the trace or imprint of such fossils. The fossil record is the only evidence that life on earth has existed for more than 3.6 billion years. Fossils are considered nonrenewable resources because the organisms from which they derive no longer exist. Thus, once destroyed, a fossil can never be replaced. Ground-disturbing activities associated with park maintenance, streetscape improvements, or construction of recreational facilities that could be implemented in the future could potentially damage or destroy paleontological resources that may be present below ground surface. As with archeological resources, paleontological resources are generally considered to be historical resources, as defined in Section 15064.5(a)(3)(D). Any implementation projects resulting from the draft ROSE Update will be subject to project-specific environmental review, including preliminary archeology and geological review by the Environmental Planning division staff, to evaluate the potential of the project to affect legally-significant archeological resources. Thus, implementation of the draft ROSE Update would result in a less than significant effect on paleontological resources.

Impact CP-4: The policies and objectives in the draft ROSE Update would not impact human remains. (No Impact)

Impacts on Native American burials are considered under Public Resources Code (PRC) Section 15064.5(d)(1). When an Initial Study identifies the existence of, or the probable likelihood of, Native American human remains within a project site, the CEQA lead agency is required to work with the appropriate tribal entity, as identified by the California Native American Heritage Commission (NAHC). The lead agency may develop an agreement with the appropriate tribal entity for testing or disposing of, with appropriate dignity, the human remains and any items

associated with Native American burials. By implementing such an agreement, the project becomes exempt from the general prohibition on disinterring, disturbing, or removing human remains from any location other than the dedicated cemetery (Health and Safety Code Section 7050.5) and the requirements of CEQA pertaining to Native American human remains.

Subsequent projects that may be implemented in the context of the ROSE would be required to comply with applicable state laws, including immediate notification of the City Coroner should human remains and associated or unassociated funerary objects be discovered during any soils-disturbing activities. If the Coroner were to determine that the remains are Native American, the NAHC would be notified and would appoint a Most Likely Descendant (PRC Section 5097.98). Because implementation of the draft ROSE Update does not include any specific projects, it would not directly disturb Native American burials or any human remains, and would therefore have no impact on human remains.

Impact C-CP: Implementation of the draft ROSE Update, in combination with past, present, and reasonably foreseeable future projects, would not result in cumulative impacts to cultural resources. (Less than Significant)

As of February 2014, there are no known past, present, or reasonably foreseeable projects in or near parks and open spaces under the jurisdiction of the RPD that would interact with the proposed project to result in cumulative significant impacts cultural or paleontological resources. Reasonably foreseeable future projects in or near parks and open spaces under the jurisdiction of the RPD include projects related to the 2008 Clean and Safe Parks Bond,³⁵ the 2012 Parks Bond,³⁶ the SNRAMP, and several athletic field renovations. These projects primarily involve renovation of existing parks and open spaces.

As a policy document, the ROSE would not directly result in physical impacts, and would not be expected to result in indirect impacts that would demonstrably contribute considerably to cumulative impacts from projects affecting or in the vicinity of open space and recreation resources. Implementation of the draft ROSE Update would result in less-than-significant impacts related to cultural or paleontological resources and would not result in a cumulatively considerable contribution to cultural or paleontological impacts. For the reasons discussed above, the proposed project's impacts related to cultural or paleontological resources, both individually and cumulatively, would be less than significant.

³⁵ SFRPD. 2008 Clean and Safe Parks Bond. Available online at: <http://sfrecpark.org/park-improvements/2008-clean-safe-bond/>. Accessed February 19, 2014.

³⁶ SFRPD. 2012 Parks Bond. Available online at: <http://sfrecpark.org/park-improvements/2012-bond/>. Accessed February 19, 2014.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
5. TRANSPORTATION AND CIRCULATION— Would the project:					
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location, that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Below is a list of significance criteria used by the San Francisco Planning Department to assess whether a proposed project would result in significant impacts to the transportation network. These criteria are organized by transportation mode to facilitate the transportation impact analysis; however, the transportation significance thresholds are essentially the same as the ones presented above in the checklist.

- The operational impact on signalized intersections is considered significant when project-related traffic causes the intersection level of service (LOS) to deteriorate from LOS D or better to LOS E or F, or from LOS E to LOS F. The project may result in significant adverse impacts at intersections that operate at LOS E or F under existing conditions depending upon the magnitude of the project's contribution to the worsening of the average delay per vehicle. In addition, the project would have a significant adverse impact if it would cause major traffic hazards or contribute considerably to cumulative traffic increases that would cause deterioration in levels of service to unacceptable levels.

- The project would have a significant effect on the environment if it would cause a substantial increase in transit demand that could not be accommodated by adjacent transit capacity, resulting in unacceptable levels of transit service; or cause a substantial increase in delays or operating costs such that significant adverse impacts in transit service levels could result. With the Muni and regional transit screenlines analyses, the project would have a significant effect on the transit provider if project-related transit trips would cause the capacity utilization standard to be exceeded during the peak hour.
- The project would have a significant effect on the environment if it would result in substantial overcrowding on public sidewalks, create potentially hazardous conditions for pedestrians, or otherwise interfere with pedestrian accessibility to the site and adjoining areas.
- The project would have a significant effect on the environment if it would create potentially hazardous conditions for bicyclists or otherwise substantially interfere with bicycle accessibility to the site and adjoining areas.
- A project would have a significant effect on the environment if it would result in a loading demand during the peak hour of loading activities that could not be accommodated within proposed on-site loading facilities or within convenient on-street loading zones, and created potentially hazardous conditions or significant delays affecting traffic, transit, bicycles or pedestrians.
- The project would have a significant effect on the environment if it would result in inadequate emergency access.
- Construction-related impacts generally would not be considered significant due to their temporary and limited duration.

Approach to Analysis

This section addresses the potential transportation effects related to implementation of the draft ROSE Update. The draft ROSE Update consists of objectives and policies related to the operation and maintenance of the existing 220 parks, open spaces and recreation facilities which range in location from residential to commercial areas throughout the City; and provides guidance for the potential location of new facilities, primarily through the implementation of other Plan areas, such as Hunter's Point Candlestick Shipyard open space improvements or improvements in public rights-of-way or property to better connect existing facilities.

The ROSE, as a policy document, does not include specific recreation or open space projects, and as such would not generate foreseeable new person trips. Therefore, the analysis of this policy document focuses on how the general goals and objectives of the draft ROSE Update correspond with other City General Plan transportation policies related to traffic, transit, pedestrian, bicycle and emergency vehicle access. The policy analysis therefore, does not include level of service (LOS), transit demand, etc. analyses that would be typical for a development project that would

generate person trips. Similarly, since no specific projects are included, an analysis of construction-related transportation effects is not feasible or warranted. As a policy document, the draft ROSE Update would not alter or affect air traffic patterns. This section does provide a comparison of the ROSE objectives and policies with City parking policies for informational purposes.

Transportation Setting

Existing Roadway Network

The Transportation Element of the General Plan classifies roadways by type within the City ranging from Freeways, Major and Secondary Arterials to Collector and Local Streets. The General Plan further identifies Primary Transit, Transit Preferential Streets and Citywide or Neighborhood Pedestrian Network Streets. Due to their varied location throughout the City, existing parks, recreational facilities and open space areas can be accessed by a variety of roadway types.

Transit Network

Local transit service throughout the City is provided by Muni, the transit division of the San Francisco Municipal Transportation Authority (SFMTA). Muni operates a fleet of buses, cable cars and light rail routes throughout the City providing both local service and connections to regional transit providers serving the North Bay, East Bay, South Bay and the Peninsula. Golden Gate Transit buses and ferries provide service to the North Bay; Bay Area Rapid Transit (BART), the Water Emergency Transportation Authority (WETA) and Alameda-Contra Costa Transit (AC Transit) District to the East Bay; and Caltrain and San Mateo County Transit District (SamTrans) to the South Bay and Peninsula. Muni routes operate seven days a week, primarily between 6 a.m. to midnight; schedules vary route-by-route, with some late night (Owl) service. Service frequencies range from three to 30 minutes depending on time of day and route, with the most frequent service provided during the weekday AM peak period (7 – 9 a.m.) and PM peak period (6 – 9 p.m.). Typical peak capacities for transit operations occur during the weekdays, in the inbound (to Downtown) direction in the mornings and in the outbound (away from Downtown) in the evenings. Muni also provides express lines which only operate in the peak period peak direction and additional event day service for recreational, sports, and civic events.

Bicycle Facilities

As indicated in the Transportation Element of the General Plan and the San Francisco Bicycle Plan, the City has a series of designated bike routes and facilities including Class I (separated bike paths), Class II (bike lanes), and Class III (signed but shared streets) facilities, which interconnect neighborhoods, attractions, and commute destinations throughout the City. Many of these facilities lead to or are located within parks, recreational and open space facilities, and include shared pathways with pedestrian traffic.

Pedestrian Facilities

Sidewalks are provided on most city streets on both sides, and are wider (up to 30 feet) on major pedestrian corridors (such as The Embarcadero). Most of the intersections with major pedestrian

activity are signalized with pedestrian signals and crosswalks, and the heaviest pedestrian activities tend to occur in or near tourist attractions and in downtown commercial areas. Pedestrian facilities in or near recreational and open space areas vary from sidewalks on one or both sides of streets to paved or unimproved pedestrian pathways separated from vehicle traffic. The City has several ongoing programs to enhance pedestrian safety and facilities including investing in 'safe routes' to schools, adding pedestrian amenities such as curb bulb-outs and benches and calming traffic where desirable to improve pedestrian conditions.

Loading Facilities

Commercial loading facilities throughout the City are provided for corresponding land uses consistent with Section 152 of the Code, and as such recreational and open space areas generally are not required to provide loading spaces except with recreational facility buildings where loading would be provided based on location in the City and building size. Therefore, commercial loading facilities related to recreational or open space facilities include designated loading spaces, nearby on-street commercial loading parking spaces (including metered spaces), and on- and off-street parking spaces, when available.

On-street passenger loading throughout the City is designated by white curbs and tends to be located near tourist (e.g., hotel, event) locations and transit facilities (BART stations). Additionally, on- or off-street passenger loading areas may be provided in relation to specific land uses, such as schools. Passenger drop-off areas are limited in recreational and open space areas and tend to be shared with other nearby land uses, such as museums or tourist attractions.

Parking Conditions

On-street parking conditions throughout the City vary depending on location, from on-street metered parking to unlimited (except for street-sweeping maintenance hours) on-street parking. Similarly the availability of off-street parking, both private and public, vary by location with more facilities being provided in the Downtown or adjacent areas than other areas of the City, where on-street parking is more readily available. Parking conditions in or near recreational or open space facilities similarly vary from providing some to no off-street parking spaces to relying on on-street parking which includes metered, posted restricted hours, or unlimited on-street parking spaces.

Key Transportation Policies and Regulations

The following is a summary of City policies and regulations related to transportation that were considered in the analysis of the draft ROSE Update objectives and policies.

San Francisco Countywide Transportation Plan

The San Francisco County Transportation Authority (SFCTA) is the designated Congestion Management Agency for San Francisco. The SFCTA is responsible for preparing a long-range Countywide Transportation Plan, prioritizing transportation investment and developing and maintaining a computerized travel demand forecasting model and related databases.

San Francisco General Plan

The Transportation Element of the General Plan is composed of several sections including 1) General, 2) Regional Transportation, 3) Congestion Management, 4) Vehicle Circulation, 5) Transit, 6) Pedestrians, 7) Bicycles, 8) Citywide Parking and 9) Goods Movement. Each section consists of objectives and policies regarding a particular segment of the master transportation system.

San Francisco Municipal Code

The San Francisco Transportation, Planning, Police and Building Code of the Municipal Code all contain provisions and regulations for traffic devices, building and facility requirements, operation of vehicles, and vehicle trip reduction.

San Francisco Transit First Policy

The San Francisco City Charter (Section 16.102) includes the Transit First Policy, a set of principles which underscore the City's commitment that travel by transit, bicycle and foot be given priority over the private automobile. These principles are further emphasized in the goals and policies of the General Plan's Transportation Element.

San Francisco Transit Effectiveness Project

The Transit Effectiveness Project (TEP) presents a thorough review of San Francisco's public transit system, initiated by SFMTA in collaboration with the City Controller's Office. The TEP is aimed at improving reliability, reducing travel times, providing more frequent service and updating Muni bus routes and rail lines to better match current travel patterns. The TEP recommendations were unanimously endorsed for purposes of initiating environmental review by the SFMTA Board of Directors in October 2008. They include new routes and route extensions, more service on busy routes, and elimination or consolidation of certain routes or route segments. SFMTA recently published a TEP Implementation Strategy (April 5, 2011). The TEP Implementation Strategy anticipates that many of the service improvements would be implemented sometime between the end of Fiscal Year (FY) 2013 and FY 2015 and that the remainder of the service improvements would occur in FY 2016.³⁷

San Francisco Bicycle Plan

The San Francisco Bicycle Plan includes short-term and long-term planned improvements for bicycle facilities throughout the City and is currently being implemented by SFMTA. Bicycle improvements range from new bike lanes to better bicycle route signage, and are located throughout the City, generally along existing designated bicycle routes.

Better Streets Plan

The Better Streets Plan consists of a set of guidelines to make San Francisco streets more useable, attractive and accessible, to make them safer and more welcoming to pedestrians, to improve their ecological functioning, and to make them a more central point of civic life.

³⁷ SFMTA, Draft Transit Effectiveness Project Implementation Strategy, April 5, 2011, page 3-5.

WalkFirst Project

The WalkFirst project is an interdepartmental collaborative project with the goal to identify key walking streets throughout San Francisco and establish criteria to prioritize pedestrian improvements fostering pedestrian safety and walking conditions, encourage walking, and enhance pedestrian connections to key destinations. This project builds on the Better Streets Plan and coordinates with other efforts to improve the City's streets and transportation system.

SFPark

The SFPark Program, implemented by SFMTA, improves parking management of metered spaces through providing dynamic information to drivers and in some locations varies the cost of parking based on demand. The SFPark Program aims to reduce traffic congestion related to drivers searching for available on-street parking spaces.

SFGo

Also implemented by SFMTA, the SFGo program is a citywide traffic management system which enables SFMTA traffic engineers, through monitoring cameras to remotely alter traffic signal controllers in key locations to dynamically adjust intersection signal timing in response to observed congestion or traffic incidents. Engineers also have access to control electronic message boards to alert drivers to upcoming observed conditions. Sometime in the future, the SFGo control center will be combined with Muni Central Control, so that transit operations can better respond to real-time congestion and incidents.

RPD – Event Permits

As described in the Environmental Setting, RPD issues permits for use of city recreational facilities ranging in size from picnic reservations to large events and concerts. For events estimated to draw 10,000 or more attendees, the permit submittal must include an Event Transportation Management Plan, which includes methods to encourage the use of alternative modes (transit, walk, and bicycle). Such methods may include providing funding for additional event day transit service, requiring attendees to purchase event day transit tickets, providing a bicycle valet parking area, or publicizing alternative modes of travel with the event, pointing out nearest transit stops or routes.

Interdepartmental Staff Committee on Traffic and Transportation (ISCOTT)

ISCOTT is a city staff committee that reviews applications for temporary street closures for special events, including street fairs, athletic events, and neighborhood block parties, at a meeting open to the public. ISCOTT is composed of representatives of several agencies including SFMTA, including Muni Operations Division, Public Works, Police, Fire, Public Health, and the Port.

Impact TR-1: The draft ROSE Update would not result in significant impacts related to traffic conditions or conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, or with an applicable congestion management program. (Less than Significant)

The draft ROSE Update objectives and policies would not generate foreseeable new person trips, including vehicle trips, and as such would not result in impacts to traffic conditions, operations

or hazards. The draft ROSE Update is a regulatory program, and its adoption would update the existing ROSE, through amended, and in some cases, new objectives and policies. No direct person trip generation would result from adopting these policies. As discussed in Population and Housing, p. 47 of this Initial Study, increases in residents and employment are projected to occur in San Francisco over a planning horizon of the next 20 years with or without implementation of the ROSE.

The ROSE Update objectives and policies, such as the following, serve to foster the better use of existing City recreational and open space facilities and continue to implement area-specific (e.g., Candlestick Point-Hunters Point Shipyard, Balboa Park Station Area Plan, etc.) open space plans that would in many ways be consistent with the City's Transit First Policy, and as policies would not substantially or adversely affect traffic conditions in the City. Traffic to and from recreational facilities and recreational events would continue as under existing conditions, including for large events, which require traffic management plans encouraging the use of alternative modes of transportation.

- Objective 3 "Improve access and connectivity to open space"
- Policy 3.1: "Creatively develop existing publicly-owned right-of-ways and streets into open space."
- Policy 3.4: "Encourage non-auto modes of transportation – transit, bicycle and pedestrian access – to and from open spaces while reducing automobile traffic and parking in public open spaces."

Many of the ROSE policies, such as those indicated above, would foster the continuation of existing programs and projects, such as the "Sunday Streets" program throughout the City, the closure of a portion of Golden Gate Park to vehicle traffic on weekends, and pedestrian-related improvements to many sidewalks and rights-of-way throughout the City, consistent with the Better Streets Program. Where policies envision the expansion of recreation or open space, such as in underutilized City-owned space, in schoolyards, and in previously analyzed plan areas, such as Treasure Island, such expansion would predominantly serve the local neighborhood population and would not substantially alter traffic patterns in the area. Where policies and objectives envision the creative use of streets, including temporary or permanent closures of streets, travel lanes or parking spaces, such improvements would be analyzed against goals to maintain sufficient travel patterns to manage congestion throughout the City. Furthermore, any specific project implementation or program would be subject to project-level environmental review. Therefore, the objectives and policies of the ROSE update would not conflict with the General Plan's Transportation Element and would not significantly impact traffic conditions in the City. Thus, implementation of the draft ROSE Update policies would have a less-than-significant impact on traffic.

Impact TR-2: The draft ROSE Update would not result in significant impacts related to transit demand or transit operation or substantially conflict with adopted policies, plans or programs regarding public transit, or otherwise decrease transit performance or safety. (Less than Significant)

As discussed under TR-1 above, the draft ROSE Update objectives and policies, would not generate new person trips, including transit trips, and as such would not result in impacts to transit demand or substantially alter transit operations.

Generally recreational and open space facilities are well-served by transit with one or more transit routes within walking distance. Transit use related to existing recreational facilities or events generally occurs throughout the day and on weekends (not peak-dependent) and therefore generally adds riders to predominantly off-peak transit operating conditions. As indicated above, for large events Muni may provide additional transit service to aid in movement of event-goers/attendees. The draft ROSE Update objectives and policies, such as the following, would serve to foster the better use of existing City recreational and open space facilities and continue to implement area-specific (such as Candlestick Point-Hunters Point Shipyard) open space plans, would not conflict with the City's Transit First Policy, and as policies, would not substantially or adversely affect transit conditions in the City.

- Objective 3 "Improve access and connectivity to open space"
- Policy 3.1 "Creatively develop existing publicly-owned right-of-ways and streets into open space."
- Policy 3.4 "Encourage non-auto modes of transportation – transit, bicycle and pedestrian access—to and from open spaces while reducing automobile traffic and parking in public open spaces."

Many of the draft ROSE Update policies and implementation actions, such as those indicated above, would foster the promotion of transit use to recreational facilities and open space. Such local transit service expansion would serve to increase the efficient use of transit without substantially affecting peak hour transit service. Similarly the continued encouragement and provision of transit use that occurs in the planning of large events, including additional service, limits the intermittent capacity effects on regularly scheduled transit operations. Although boarding times for bicyclists on transit is slightly higher, encouraging the use of bicycles on buses with bike racks would generally foster local service use and would not substantially affect peak hour transit operating conditions. As such, the objectives and policies of the draft ROSE Update would be consistent with City's Transportation Element, planned TEP service improvements and 'Transit First' transportation policies to encourage alternate modes of travel including transit, including to and from City parks and open space. The ROSE Update policies would not substantially or adversely affect transit conditions in the City.

Impact TR-3: The draft ROSE Update would not result in significant impacts related to bicycles or bicycle facilities or substantially conflict with adopted policies, plans or programs regarding bicycle facilities or otherwise decrease the performance or safety of such features. (Less than Significant)

As discussed above, the draft ROSE Update objectives and policies would not directly generate foreseeable new person trips and as such would not result in impacts to bicycle facilities. However, through implementation of the draft ROSE Update's policies, in conjunction with improvements set forth in the Bicycle Plan, a potential exists to shift some of the forecasted

growth from single-occupancy vehicles to bicycle, transit or other modes. Existing bicycle facilities in or near recreational facilities would continue to be utilized and implementation of any planned short- or long-term improvements contained in the San Francisco Bicycle Plan would not conflict with the policies or objectives in the ROSE Update that may be implemented.

The draft ROSE Update objectives and policies, such as the following, would serve to foster the better use of existing City recreational and open space facilities and continue to implement area-specific (such as the Mission Area Plan) open space plans, encouraging the use of alternate modes over private vehicles and as policies would not substantially affect bicycle conditions in the City.

- Objective 3 "Improve access and connectivity to open space"
- Policy 3.1 "Creatively develop existing publicly-owned right-of-ways and streets into open space."
- Policy 3.4 "Encourage non-auto modes of transportation – transit, bicycle and pedestrian access—to and from open spaces while reducing automobile traffic and parking in public open spaces."

Many of the draft ROSE Update policies, such as those indicated above, examine ways to improve bicycle facilities and further promote the use of bicycles in the City, including those connecting to recreational facilities and open space. Such expansion in the use of local or regionally connecting bicycle routes and paths would not substantially affect these facilities or their capacity. Furthermore, maintaining existing or implementing planned bicycle facilities in previously analyzed Plan areas, would continue to foster bicycle use throughout the City. Following study and recommendation, any specific project implementation or program would be subject to project-level review. The objectives and policies of the draft ROSE Update would neither create potentially hazardous conditions for bicyclists, nor otherwise substantially interfere with bicycle accessibility to parks or adjoining areas. The draft ROSE Update would therefore not conflict with City's Transportation Element and transportation policies to encourage alternate modes of travel including bicycles, including to and from City parks and open space, and would not significantly impact bicycle conditions in the City.

Impact TR-4: The draft ROSE Update would not result in significant adverse effects related to pedestrians or pedestrian facilities or substantially conflict with adopted policies, plans or programs regarding pedestrian facilities or otherwise decrease the performance or safety of such features. (Less than Significant)

As discussed above, the draft ROSE Update objectives and policies would not generate new person trips, including pedestrian trips, and as such would not result in impacts to pedestrian facilities. The draft ROSE Update objectives and policies, such as the following, would serve to foster the better use of existing City recreational and open space facilities and continue to implement area-specific (e.g., Market and Octavia) open space plans, in many ways that would be consistent with the City's Transit First Policy, encouraging improvements to pedestrian facilities and as policies would not substantially affect pedestrian conditions in the City.

- Policy 1.6: "Support the continued improvement of Golden Gate Park while preserving the beauty of its naturalistic landscape."
- Policy 3.3: "Develop and enhance the City's recreational trail system, linking to the regional hiking and biking trail system and considering historic water courses to improve stormwater management."

Many of the draft ROSE Update policies, such as those indicated above, call for examining ways to further promote improvements to pedestrian facilities both within parks and open space; examining creative ways to interconnect existing open space and park facilities; and for investigating opportunities to better use underutilized public space and public rights-of-way to foster pedestrian facilities. Such expansion in the use of pedestrian facilities in or outside of parks and recreation areas would not substantially affect these or surrounding pedestrian facilities or their capacity. Furthermore, maintaining existing or implementing planned pedestrian improvements in previously analyzed Plan areas, in conjunction with the design typologies in the adopted Better Streets Plan would further foster pedestrian use, as well as improving connections to other modes of travel, such as transit. Following study and recommendation, any specific project implementation or program would be subject to project-level environmental review. The objectives and policies of the draft ROSE Update would not be expected to result in substantial overcrowding on public sidewalks, create potentially hazardous conditions for pedestrians, or otherwise interfere with pedestrian accessibility to parks, recreational facilities and adjoining areas. The draft ROSE Update would not conflict with the City's Transportation Element and policies to encourage alternate modes of travel including pedestrian travel to and from City parks and open space, and as policies would not significantly impact pedestrian conditions.

Impact TR-5: The policies and objectives in the draft ROSE Update would not result loading conflicts. (No Impact)

The draft ROSE Update does not include any policies that pertain to loading. While on- or off-street passenger loading areas may be proposed or required in relation to specific land uses, such as recreational facilities, future proposals would require project-specific review to determine loading demand and to evaluate the potential for conflicts associated with on- or off-street loading. Because the draft ROSE Update contains no policies related to loading, its implementation would not be expected to create potentially hazardous conditions or significant delays affecting traffic, transit, bicycles or pedestrians.

Impact TR-6: The policies and objectives in the draft ROSE Update would not result inadequate emergency access. (Less than Significant)

The ROSE update objectives and policies would serve to foster the better use of existing City recreational and open space facilities and as such would not affect existing emergency access to recreational or open space facilities. Although some ROSE update policies and objectives would encourage the reduction of private vehicle use, in some cases through the reduction of non-essential roadways or in exploring further temporary or permanent changes to public rights-of-way, any such resulting recommendations which would alter vehicle access, including emergency access, would, similar to existing programs, be required to prioritize and provide

emergency access where needed. Additionally, some of the draft ROSE Update policies – and the Open Space Framework in general – call for “dynamic activation and flexible programming of open space” (Policy 1.1). Implementation of this policy could result in increased numbers of park users above existing conditions. The current ROSE contains a similar policy that calls for making “better use of existing facilities” (Policy 4.1). Although increases in attendees to special events could be an outcome of implementing the ROSE Update, its implementation would not conflict with or alter existing requirements or conditions for temporary street closures. Conditions that call for “a continuous passageway in the roadway at least 14 feet in width shall be maintained at all times during the period of such use or occupancy for the use of emergency vehicles”³⁸ or others may be required as conditions of permits for RPD or other types of events.

Following study and recommendation, any specific project implementation or program would be subject to project-level review, including the examination of any alteration of vehicle access as part of ISCOTT review, environmental review or both. As such, the draft ROSE Update objectives and policies would not result in inadequate emergency access.

Impact C-TR: Implementation of the draft ROSE Update, in combination of past, present, and reasonably foreseeable future projects, would not result in substantial cumulative transportation impacts. (Less than Significant)

As of February 2014, there are no known past, present, or reasonably foreseeable projects in or near parks and open spaces under the jurisdiction of the RPD that would interact with the proposed project to result in cumulative significant transportation impacts. Reasonably foreseeable future projects in or near parks and open spaces under the jurisdiction of the RPD include projects related to the 2008 Clean and Safe Parks Bond,³⁹ the 2012 Parks Bond,⁴⁰ the SNRAMP, and several athletic field renovations. These projects primarily involve renovation of existing parks and open spaces.

As a policy document, the ROSE would not directly result in physical impacts, and would not be expected to result in indirect impacts that would demonstrably contribute considerably to cumulative impacts from projects affecting or in the vicinity of open space and recreation resources. Implementation of the draft ROSE Update would not result in transportation-related impacts and would not result in a cumulatively considerable contribution to transportation-related impacts. For the reasons discussed above, the proposed project’s impacts related to transportation and circulation, both individually and cumulatively, would be less than significant.

³⁸ Temporary Street Closure application, SFMTA, Division of Sustainable Streets, accessible online at <http://www.sfmta.com/cms/oclos/strclos.htm>

³⁹ SFRPD. 2008 Clean and Safe Parks Bond. Available online at: <http://sfrecpark.org/park-improvements/2008-clean-safe-bond/>. Accessed February 19, 2014.

⁴⁰ SFRPD. 2012 Parks Bond. Available online at: <http://sfrecpark.org/park-improvements/2012-bond/>. Accessed February 19, 2014.

Parking Conditions

Public Resources Code Section 21099(d), effective January 1, 2014, provides that, "aesthetics and parking impacts of a residential, mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment." Accordingly, aesthetics and parking are no longer to be considered in determining if a project has the potential to result in significant environmental effects for projects that meet all of the following three criteria:

- a) The project is in a transit priority area;
- b) The project is on an infill site; and
- c) The project is residential, mixed-use residential, or an employment center.

Implementation of the draft ROSE Update would not meet the above criteria. In addition, future construction activities that may result from the draft ROSE Update would not meet criterion c) above. San Francisco does not consider parking supply as part of the permanent physical environment and therefore, does not consider changes in parking conditions to be environmental impacts as defined by CEQA. The San Francisco Planning Department acknowledges, however, that parking conditions may be of interest to the public and the decision makers. Therefore, this report presents a parking analysis for information purposes.

Parking conditions are not static, as parking supply and demand varies from day to day, from day to night, from month to month, etc. Hence, the availability of parking spaces (or lack thereof) is not a permanent physical condition, but changes over time as people change their modes and patterns of travel. While parking conditions change over time, a substantial shortfall in parking caused by a project that creates hazardous conditions or significant delays to traffic, transit, bicycles or pedestrians could adversely affect the physical environment. Whether a shortfall in parking creates such conditions will depend on the magnitude of the shortfall and the ability of drivers to change travel patterns or switch to other travel modes. If a substantial shortfall in parking caused by a project creates hazardous conditions or significant delays in travel, such a condition could also result in secondary physical environmental impacts (e.g., air quality or noise impacts caused by congestion), depending on the project and its setting.

The absence of a ready supply of parking spaces, combined with available alternatives to auto travel (e.g., transit service, taxis, bicycles or travel by foot) and a relatively dense pattern of urban development, induces many drivers to seek and find alternative parking facilities, shift to other modes of travel, or change their overall travel habits. Any such resulting shifts to transit service or other modes (walking and biking), would be in keeping with the City's "Transit First" policy and numerous San Francisco General Plan Policies, including those in the Transportation Element. The City's Transit First Policy, established in the City's Charter Article 8A, Section 8A.115, provides that "parking policies for areas well served by public transit shall be designed to encourage travel by public transportation and alternative transportation."

The transportation analysis accounts for potential secondary effects, such as cars circling and looking for a parking space in areas of limited parking supply, by assuming that all drivers would attempt to find parking at or near the project site and then seek parking farther away if convenient parking is unavailable. The secondary effects of drivers searching for parking is typically offset by a reduction in vehicle trips due to others who are aware of constrained parking conditions in a given area, and thus choose to reach their destination by other modes (i.e. walking, biking, transit, taxi). If this occurs, any secondary environmental impacts that may result from a shortfall in parking in the vicinity of the proposed project would be minor, and the traffic assignments used in the transportation analysis, as well as in the associated air quality, noise and pedestrian safety analyses, would reasonably address potential secondary effects.

Parking generally is not required for recreational and open spaces, except in relation to the provision of arts activities in buildings, stadiums, or auditorium-type uses. As indicated under the Setting, off-street parking is provided at some recreational facilities, while others rely on on-street metered or hourly-restricted parking spaces. In three instances, parking garages are located directly underneath RPD facilities: at the Music Concourse in Golden Gate Park; under Union Square; and beneath United Nations Plaza.

The draft ROSE Update objectives and policies, such as those listed below, would not substantially affect existing parking conditions in or near existing adjacent recreational facilities throughout the City. The draft ROSE Update objectives and policies, such as the following, do include measures to reduce automobile traffic in public open spaces and reuse rights-of-way, including parking spaces, to improve pedestrian conditions, and such policies would be consistent with the City's Transit First Policy.

- Policy 3.1: "Creatively develop existing publicly-owned right-of-ways and streets into open space."
- Policy 3.4: "Encourage non-auto modes of transportation – transit, bicycle and pedestrian access—to and from open spaces while reducing automobile traffic and parking in public open spaces."

Many of the draft ROSE Update policies, such as those indicated above, foster the continuation of existing programs and projects, such as the City's "Pavement to Parks" and "Parklets" programs which convert city street rights-of-way, including parking spaces to passive recreational and pedestrian-oriented uses. Such expansions would not substantially alter existing parking conditions throughout the City, though they could contribute to a parking shortfall. Through encouraging the use of SFPark near recreational facilities would allow drivers to locate parking spaces more easily and help reduce traffic congestion related to the circling of vehicles looking for available parking.

In light of the above, implementation of the draft ROSE Update would not result in significant impacts with respect to parking.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
6. NOISE — Would the project:					
a) Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan area, or, where such a plan has not been adopted, in an area within two miles of a public airport or public use airport, would the project expose people residing or working in the area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project located in the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Be substantially affected by existing noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The City's parks, open spaces and recreational facilities are not within an airport land use plan area in the vicinity of private airstrips. Therefore, topics 6e and 6f are not applicable.

Impact NO-1: Implementation of the draft ROSE Update would not expose persons to noise levels in excess of standards established in the General Plan or noise ordinance. (No Impact)

Noise in San Francisco is regulated by the following state statutes and local ordinances:

- **Construction Noise:** Construction noise is regulated by the San Francisco Noise Ordinance (Article 29 of the Police Code), amended in November 2008. The ordinance requires that noise levels from individual pieces of construction equipment, other than impact tools, not exceed 80 dBA⁴¹ at a distance of 100 feet from the source. Impact tools (jackhammers,

⁴¹ Sound pressure is measured in decibels (dB), with zero dB corresponding roughly to the threshold of human hearing, and 120 dB to 140 dB corresponding to the threshold of pain. Because sound pressure can vary by over one trillion times within the range of human hearing, a logarithmic loudness scale is used to keep sound intensity numbers at a convenient and manageable level. Owing to the variation in sensitivity of the human ear to various frequencies,

hoerammers, impact wrenches) must have both intake and exhaust mufflers as well as be equipped with acoustically attenuating shields or shrouds to the satisfaction of the Director of Public Works or the Director of Building Inspection. Section 2908 of the Ordinance prohibits construction work between 8:00 p.m. and 7:00 a.m., if noise would exceed the ambient noise level by 5 dBA at the project property line, unless a special permit is authorized by the Director of Public Works or the Director of Building Inspection.

- **Fixed Sources:** The Noise Ordinance limits noise from sources defined as “any machine or device, music or entertainment or any combination of same” located on residential or commercial/industrial property to 5 dBA or 8 dBA, respectively, above the local “ambient”⁴² at any point outside of the property plane of a residential, commercial/industrial or public land use, respectively, containing the noise source. An additional low-frequency criterion applies to noise generated from a licensed Place of Entertainment, specifically that no associated noise or music shall exceed the low-frequency ambient noise level by more than 8 dBA. The Noise Ordinance limits noise from a “fixed source”⁴³ from causing the noise level measured inside any sleeping or living room in any dwelling unit located on residential property to 45 dBA between the hours of 10:00 p.m. to 7:00 a.m. or 55 dBA between the hours of 7:00 a.m. to 10:00 p.m. with windows open except where building ventilation is achieved through mechanical systems that allow windows to remain closed.
- **Special Events:** The RPD regulates amplified noise as part of overall permitting provisions required for special events. In general, amplified sound levels are restricted to 80 dBA; hours of sound amplification are tailored to the specifics of the event. Park Patrol retains the right to monitor and adjust sound levels during the event as required for the general public.
- **Noise Insulation:** California’s Building Standards Code (Title 24 of the California Code of Regulations, which at the local level is enforced by DBI) establishes energy efficiency standards for residential and non-residential buildings. Title 24 also contains noise insulation standards that require new multi-unit and hotel/motel structures to meet an interior noise level not exceeding 45 dBA (L_{dn}) in any habitable room and, where such units are proposed in areas subject to outdoor noise levels in excess of than 60 dBA (L_{dn}), acoustical studies must be conducted that demonstrate that the design of the building will reduce interior noise to 45 dBA (L_{dn}) or less. If compliance with the required interior noise levels would only occur with windows closed, an alternative means of ventilation must be provided.

sound is “weighted” to emphasize frequencies to which the ear is more sensitive, via a method known as A-weighting and expressed in units of A-weighted decibels (dBA).

⁴² By definition, Noise Ordinance Section 2901(a) states “ambient” means the lowest sound level repeating itself during a minimum ten-minute period as measured with a type 1, precision sound level meter, set on slow response and A-weighting ... in no case shall the ambient be considered or determined to be (1) less than 35 dBA for interior residential noise, and (2) 45 dBA in all other locations.”

⁴³ Noise Ordinance Section 2901(e) states “fixed source” means a machine or device capable of creating a noise level at the property upon which it is regularly located, including but not limited to: industrial and commercial process machinery and equipment, pumps, fans, air conditioning apparatus or refrigeration machines.

- **Land Use Compatibility:** The San Francisco General Plan, which contains Land Use Compatibility Guidelines for Community Noise in its Environmental Protection Element.⁴⁴ These guidelines, which are similar to state guidelines promulgated by the Governor's Office of Planning and Research, indicate maximum acceptable noise levels for various newly developed land uses. For playgrounds and parks, the maximum "satisfactory" outside noise level is 70 dBA (L_{dn}), while in areas where noise levels range between 70-75 dBA, a detailed analysis of noise reduction requirements is typically necessary prior to final review and approval. Above noise levels of 75 dBA (L_{dn}), park and playground development is generally discouraged.⁴⁵

The policies in the draft ROSE Update would not directly increase ambient noise levels or result in construction noise effects. Parks, open spaces and recreational facilities that may be developed in the future in the context of the ROSE would be subject to the above regulations, and would be reviewed based on the specifics of the land use program or proposal for their potential to cause adverse noise effects. As such, the draft ROSE Update would have no impact on noise.

Impact NO-2: Implementation of the draft ROSE Update would not result in exposure of persons to generation of excessive groundborne vibration or groundborne noise levels. (No Impact)

As previously stated, no buildings or facilities would be constructed as part of the draft ROSE Update. Depending on the specific proposal, future open space improvements could require the use of heavy equipment for grading and excavation that may result in groundborne vibration effects. Because no open space improvements are proposed at this time, specific construction details associated with possible projects, including phasing, duration and types of construction equipment are not known. The implementation of the ROSE Update is long-term in nature and future projects would be subject to independent study and environmental review. Compliance with the Noise Ordinance is required by law and would serve to avoid significant adverse vibration impacts of the potential open space improvements on sensitive receptors such as residential uses. Therefore, vibration impacts associated with construction of open space improvements that may result from the draft ROSE Update would be less than significant.

Impact NO-3: Implementation of the draft ROSE Update would not cause a substantial permanent increase in ambient noise levels. (Less than Significant)

The General Plan's Environmental Protection Element includes the following objectives and policies related to noise: "Promote site planning, building orientation and design and interior layout that will lessen noise intrusion" (Policy 10.1); "Promote land uses that are compatible with various transportation noise levels" (Objective 11); and "Locate new noise-generating

⁴⁴ *San Francisco General Plan, Environmental Protection Element, Policy 11.1, San Francisco Planning Department, June 30, 2007, Figure 19 - Land Use Compatibility Chart for Community Noise.* Accessible on-line at http://www.sf-planning.org/ftp/general_plan/16_Environmental_Protection.htm. Available for public review at the Planning Department, 1650 Mission Street, Suite 400, San Francisco.

⁴⁵ The residential guidelines are based on maintaining an interior noise level of 45 dBA, L_{dn}, as required by the California Noise Insulation Standards in Title 24, Part 2 of the California Code of Regulations.

development so that the noise impact is reduced" (Policy 11.3). Parks, open spaces and recreational facilities are not inherently noisy land uses. Operational noise would be related to typical park use activities, temporary public gatherings, sporting events and to some extent, vehicular traffic. With regard to events, RPD regulates amplified noise as part of overall permitting provisions required for the event in question. Permit conditions restrict amplified sound levels to 80 dBA and the Park Patrol retains the right to monitor and adjust sound levels during the event as required for the general public. Implementation of the draft ROSE Update would not alter or conflict with this standard permit condition.

In most of San Francisco, traffic makes the greatest contribution to ambient noise levels. The draft ROSE Update would not directly generate person trips and would not be expected to increase vehicle trips to parks and recreational facilities. It also includes Policy 3.4 which "Encourage[s] non-auto modes of transportation – transit, bicycle and pedestrian access—to and from open spaces while reducing automobile traffic and parking in public open spaces." This policy relates to the policies and objectives in the General Plan's Environmental Protection Element that call for "Reduc[ing] transportation-related noise" (Objective 9); "Impos[ing] traffic restrictions to reduce transportation noise" (Policy 9.2); and "Minimiz[ing] the impact of noise on affected areas" (Objective 10).

The draft ROSE Update's policies would not conflict with the policies in the General Plan's Environmental Protection Element that pertain to noise. Scientific studies indicate that an approximate doubling of traffic volumes would be necessary to produce an increase in ambient noise levels noticeable to most people.⁴⁶ Thus, given that implementation of the draft ROSE Update would not directly generate person trips, it follows that it would also not cause traffic volumes to double and would not have a noticeable effect on ambient noise levels.

Impact C-NO-: Implementation of the draft ROSE Update, in combination with past, present, and reasonably foreseeable future projects, would not result in substantial cumulative noise impacts. (Less than Significant)

As of February 2014, there are no known past, present, or reasonably foreseeable projects in or near parks and open spaces under the jurisdiction of the RPD that would interact with the proposed project to result in cumulative significant noise impacts. Reasonably foreseeable future projects in or near parks and open spaces under the jurisdiction of the RPD include projects related to the 2008 Clean and Safe Parks Bond,⁴⁷ the 2012 Parks Bond,⁴⁸ the SNRAMP, and several athletic field renovations. These projects primarily involve renovation of existing parks and open spaces.

⁴⁶ *San Francisco Better Streets Plan Mitigated Negative Declaration*, p. 111. Available for review at the Planning Department, 1650 Mission Street, Suite 400 in Case File No. 2007.1238E.

⁴⁷ SFRPD. *2008 Clean and Safe Parks Bond*. Available online at <http://sfrecpark.org/park-improvements/2008-clean-safe-bond/>. Accessed February 19, 2014.

⁴⁸ SFRPD. *2012 Parks Bond*. Available online at <http://sfrecpark.org/park-improvements/2012-bond/>. Accessed February 19, 2014.

As a policy document, the ROSE would not directly result in physical impacts, and would not be expected to result in indirect impacts that would demonstrably contribute considerably to cumulative impacts from projects affecting or in the vicinity of open space and recreation resources. Implementation of the draft ROSE Update would not result in construction or operation noise impacts and would not be expected to contribute to any significant cumulative increases in ambient noise as a result of the project. For the reasons discussed above, the proposed project's impacts related to noise, both individually and cumulatively, would be less than significant.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
7. AIR QUALITY—Would the project					
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal, state, or regional ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Setting

Overview

The Bay Area Air Quality Management District (BAAQMD) is the regional agency with jurisdiction over the nine-county San Francisco Bay Area Air Basin (SFBAAB), which includes San Francisco, Alameda, Contra Costa, Marin, San Mateo, Santa Clara, and Napa Counties and portions of Sonoma and Solano Counties. The BAAQMD is responsible for attaining and maintaining air quality in the SFBAAB within federal and state air quality standards, as established by the federal Clean Air Act (CAA) and the California Clean Air Act (CCAA), respectively. Specifically, the BAAQMD has the responsibility to monitor ambient air pollutant levels throughout the SFBAAB and to develop and implement strategies to attain the applicable federal and state standards. The CAA and the CCAA require plans to be developed for areas that do not meet air quality standards, generally. The most recent air quality plan, the *2010 Clean Air Plan*, was adopted by the BAAQMD on September 15, 2010. The *2010 Clean Air Plan* updates the

Bay Area 2005 Ozone Strategy in accordance with the requirements of the CCAA to implement all feasible measures to reduce ozone; provide a control strategy to reduce ozone, particulate matter, air toxics, and greenhouse gases in a single, integrated plan; and establish emission control measures to be adopted or implemented. The 2010 CAP contains the following primary goals:

- Attain air quality standards;
- Reduce population exposure and protect public health in the San Francisco Bay Area; and
- Reduce greenhouse gas emissions and protect the climate.

The *2010 Clean Air Plan* represents the most current applicable air quality plan for the SFBAAB. Consistency with this plan is the basis for determining whether the proposed project would conflict with or obstruct implementation of air quality plans.

Criteria Air Pollutants

In accordance with the state and federal CAAs, air pollutant standards are identified for the following six criteria air pollutants: ozone, carbon monoxide (CO), particulate matter (PM), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and lead. These air pollutants are termed criteria air pollutants because they are regulated by developing specific public health- and welfare-based criteria as the basis for setting permissible levels. In general, the SFBAAB experiences low concentrations of most pollutants when compared to federal or state standards. The SFBAAB is designated as either in attainment⁴⁹ or unclassified for most criteria pollutants with the exception of ozone, PM_{2.5}, and PM₁₀, for which these pollutants are designated as non-attainment for either the state or federal standards. By its very nature, regional air pollution is largely a cumulative impact in that no single project is sufficient in size to, by itself, result in non-attainment of air quality standards. Instead, a project's individual emissions contribute to existing cumulative air quality impacts. If a project's contribution to cumulative air quality impacts is considerable, then the project's impact on air quality would be considered significant.⁵⁰

Land use projects may contribute to regional criteria air pollutants during the construction and operational phases of a project. Table 5 identifies air quality significance thresholds followed by a discussion of each threshold. Projects that would result in criteria air pollutant emissions below these significance thresholds would not violate an air quality standard, contribute substantially to an air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants within the SFBAAB.

⁴⁹ "Attainment" status refers to those regions that are meeting federal and/or state standards for a specified criteria pollutant. "Non-attainment" refers to regions that do not meet federal and/or state standards for a specified criteria pollutant. "Unclassified" refers to regions where there is not enough data to determine the region's attainment status for a specified criteria air pollutant.

⁵⁰ Bay Area Air Quality Management District (BAAQMD), *California Environmental Quality Act Air Quality Guidelines*, May 2011, page 2-1.

Table 5: Criteria Air Pollutant Significance Thresholds

Pollutant	Construction Thresholds	Operational Thresholds	
	Average Daily Emissions (lbs./day)	Average Daily Emissions (lbs./day)	Maximum Annual Emissions (tons/year)
ROG	54	54	10
NO _x	54	54	10
PM ₁₀	82 (exhaust)	82	15
PM _{2.5}	54 (exhaust)	54	10
Fugitive Dust	Construction Dust Ordinance or other Best Management Practices	Not Applicable	

Ozone Precursors. As discussed previously, the SFBAAB is currently designated as non-attainment for ozone and particulate matter. Ozone is a secondary air pollutant produced in the atmosphere through a complex series of photochemical reactions involving reactive organic gases (ROG) and oxides of nitrogen (NO_x). The potential for a project to result in a cumulatively considerable net increase in criteria air pollutants, which may contribute to an existing or projected air quality violation, are based on the state and federal Clean Air Acts emissions limits for stationary sources. To ensure that new stationary sources do not cause or contribute to a violation of an air quality standard, BAAQMD Regulation 2, Rule 2 requires that any new source that emits criteria air pollutants above a specified emissions limit must offset those emissions. For ozone precursors ROG and NO_x, the offset emissions level is an annual average of 10 tons per year (or 54 pounds (lbs.) per day).⁵¹ These levels represent emissions by which new sources are not anticipated to contribute to an air quality violation or result in a considerable net increase in criteria air pollutants.

Particulate Matter (PM₁₀ and PM_{2.5}).⁵² The federal New Source Review (NSR) program was created by the federal CAA to ensure that stationary sources of air pollution are constructed in a manner that is consistent with attainment of federal health based ambient air quality standards. For PM₁₀ and PM_{2.5}, the emissions limit under NSR is 15 tons per year (82 lbs. per day) and 10 tons per year (54 lbs. per day), respectively. These emissions limits represent levels at which a source is not expected to have an impact on air quality.⁵³ Although the regulations specified above apply to new or modified stationary sources, land use development projects result in ROG, NO_x, PM₁₀ and PM_{2.5} emissions as a result of increases in vehicle trips, architectural coating and construction activities. Therefore, the above thresholds can be applied to the construction and operational phases of land use projects and those projects that result in emissions below these

⁵¹ BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, page 17.

⁵² PM₁₀ is often termed "coarse" particulate matter and is made of particulates that are 10 microns in diameter or smaller. PM_{2.5}, termed "fine" particulate matter, is composed of particles that are 2.5 microns or less in diameter.

⁵³ BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, page 16.

thresholds would not be considered to contribute to an existing or projected air quality violation or result in a considerable net increase in ozone precursors or particulate matter. Due to the temporary nature of construction activities, only the average daily thresholds are applicable to construction phase emissions.

Fugitive Dust. Fugitive dust emissions are typically generated during construction phases. Studies have shown that the application of best management practices (BMPs) at construction sites significantly control fugitive dust.⁵⁴ Individual measures have been shown to reduce fugitive dust by anywhere from 30 to 90 percent.⁵⁵ The BAAQMD has identified a number of BMPs to control fugitive dust emissions from construction activities.⁵⁶ The City's Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008) requires a number of fugitive dust control measures to ensure that construction projects do not result in visible dust. The BMPs employed in compliance with the City's Construction Dust Control Ordinance is an effective strategy for controlling construction-related fugitive dust.

Local Health Risks and Hazards

In addition to criteria air pollutants, individual projects may emit toxic air contaminants (TACs). TACs collectively refer to a diverse group of air pollutants that are capable of causing chronic (i.e., of long-duration) and acute (i.e., severe but of short-term) adverse effects to human health, including carcinogenic effects. Human health effects of TACs include birth defects, neurological damage, cancer, and mortality. There are hundreds of different types of TACs with varying degrees of toxicity. Individual TACs vary greatly in the health risk they present; at a given level of exposure, one TAC may pose a hazard that is many times greater than another.

Unlike criteria air pollutants, TACs do not have ambient air quality standards but are regulated by the BAAQMD using a risk-based approach to determine which sources and pollutants to control as well as the degree of control. A health risk assessment is an analysis in which human health exposure to toxic substances is estimated, and considered together with information regarding the toxic potency of the substances, to provide quantitative estimates of health risks.⁵⁷

Air pollution does not affect every individual in the population in the same way, and some groups are more sensitive to adverse health effects than others. Land uses such as residences, schools, children's day care centers, hospitals, and nursing and convalescent homes are considered to be the most sensitive to poor air quality because the population groups associated with these uses have increased susceptibility to respiratory distress or, as in the case of residential

⁵⁴ Western Regional Air Partnership. 2006. *WRAP Fugitive Dust Handbook*. September 7, 2006. This document is available online at http://www.wrapair.org/forums/dejff/dh/content/FDHandbook_Rev_06.pdf, accessed February 16, 2012.

⁵⁵ BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, page 27.

⁵⁶ BAAQMD, *CEQA Air Quality Guidelines*, May 2011.

⁵⁷ In general, a health risk assessment is required if the BAAQMD concludes that projected emissions of a specific air toxic compound from a proposed new or modified source suggest a potential public health risk. The applicant is then subject to a health risk assessment for the source in question. Such an assessment generally evaluates chronic, long-term effects, estimating the increased risk of cancer as a result of exposure to one or more TACs.

receptors, their exposure time is greater than for other land uses. Therefore, these groups are referred to as sensitive receptors. Exposure assessment guidance typically assumes that residences would be exposed to air pollution 24 hours per day, 350 days per year, for 70 years. Therefore, assessments of air pollutant exposure to residents typically result in the greatest adverse health outcomes of all population groups.

Exposures to fine particulate matter (PM_{2.5}) are strongly associated with mortality, respiratory diseases, and lung development in children, and other endpoints such as hospitalization for cardiopulmonary disease.⁵⁸ In addition to PM_{2.5}, diesel particulate matter (DPM) is also of concern. The California Air Resources Board (ARB) identified DPM as a TAC in 1998, primarily based on evidence demonstrating cancer effects in humans.⁵⁹ The estimated cancer risk from exposure to diesel exhaust is much higher than the risk associated with any other TAC routinely measured in the region.

In an effort to identify areas of San Francisco most adversely affected by sources of TACs, San Francisco partnered with the BAAQMD to inventory and assess air pollution and exposures from mobile, stationary, and area sources within San Francisco. Areas with poor air quality, termed the "Air Pollutant Exposure Zone," were identified based on two health-protective criteria: (1) excess cancer risk from the contribution of emissions from all modeled sources greater than 100 per one million population, and/or (2) cumulative PM_{2.5} concentrations greater than 10 micrograms per cubic meter (µg/m³).

Excess Cancer Risk. The above 100 per one million persons (100 excess cancer risk) criteria is based on United State Environmental Protection Agency (USEPA) guidance for conducting air toxic analyses and making risk management decisions at the facility and community-scale level.⁶⁰ As described by the BAAQMD, the USEPA considers a cancer risk of 100 per million to be within the "acceptable" range of cancer risk. Furthermore, in the 1989 preamble to the benzene National Emissions Standards for Hazardous Air Pollutants (NESHAP) rulemaking,⁶¹ the USEPA states that it "...strives to provide maximum feasible protection against risks to health from hazardous air pollutants by (1) protecting the greatest number of persons possible to an individual lifetime risk level no higher than approximately one in one million and (2) limiting to no higher than approximately one in ten thousand [100 in one million] the estimated risk that a person living near a plant would have if he or she were exposed to the maximum pollutant concentrations for 70 years." The 100 per one million excess cancer cases is also consistent with the ambient cancer risk in the most pristine portions of the Bay Area based on BAAQMD regional modeling.⁶²

⁵⁸ SFDPH, *Assessment and Mitigation of Air Pollutant Health Effects from Intra-Urban Roadways: Guidance for Land Use Planning and Environmental Review*, May 2008.

⁵⁹ California Air Resources Board (ARB), Fact Sheet, "The Toxic Air Contaminant Identification Process: Toxic Air Contaminant Emissions from Diesel-fueled Engines," October 1998.

⁶⁰ BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, page 67.

⁶¹ 54 Federal Register 38044, September 14, 1989.

⁶² BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, page 67.

Fine Particulate Matter. In April 2011, the USEPA published *Policy Assessment for the Particulate Matter Review of the National Ambient Air Quality Standards*, "Particulate Matter Policy Assessment." In this document, USEPA staff concludes that the current federal annual PM_{2.5} standard of 15 µg/m³ should be revised to a level within the range of 13 to 11 µg/m³, with evidence strongly supporting a standard within the range of 12 to 11 µg/m³. The Air Pollutant Exposure Zone for San Francisco is based on the health protective PM_{2.5} standard of 11 µg/m³, as supported by the USEPA's Particulate Matter Policy Assessment, although lowered to 10 µg/m³ to account for uncertainty in accurately predicting air pollutant concentrations using emissions modeling programs.

Land use projects within these Air Pollutant Exposure Zones require special consideration to determine whether the project's activities would expose sensitive receptors to substantial air pollutant concentrations or add emissions to areas already adversely affected by poor air quality.

Approach to Analysis

Implementation of the draft ROSE Update is a regulatory program and in and of itself would not directly involve construction activities that would generate fugitive dust, criteria air pollutants, or TACs. However, the draft ROSE Update includes policies that may indirectly result in construction activities, such as ground-disturbing activities associated with park maintenance, streetscape improvements, or construction of recreational facilities. Air quality impacts related to future construction associated with the draft ROSE Update would fall into two categories: short-term impacts from construction and long-term impacts from operation of recreational facilities.

These future construction activities, which would generate fugitive dust or result in emissions of air pollutants or TACs would be temporary and substantially similar to those implemented under the existing, 1986 ROSE. Furthermore, the Planning Department screens each of these future projects to determine whether the project exceeds the criteria established by the BAAQMD and whether the project site is located in an identified Air Pollutant Exposure Zone and ensures that any conditions imposed by the decision body on the project are satisfied through the mitigation monitoring and reporting program (MMRP).

Therefore, the following analysis clarifies that the implantation of the draft ROSE Update would not directly result in significant air quality impacts and addresses that potential construction and operational air quality impacts that may result from construction activities associated with the draft ROSE Update.

Impact AQ-1: Implementation of the draft ROSE Update would not violate an air quality standard, contribute substantially to an existing or projected air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants. (Less than Significant)

Implementation of the draft ROSE Update would not directly involve construction activities that would generate criteria air pollutants. However, the draft Rose Update includes policies that may indirectly result in construction activities, such as ground-disturbing activities associated with park maintenance, streetscape improvements, or construction of recreational facilities.

Construction activities (short-term) typically result in emissions of ozone precursors and particulate matter in the form of dust (fugitive dust) and exhaust (e.g., vehicle tailpipe emissions). Emissions of ozone precursors and particulate matter are primarily a result of the combustion of fuel from on-road and off-road vehicles. However, ROGs are also emitted from activities that involve painting, other types of architectural coatings, or asphalt paving. During the period of future construction that may result from the draft ROSE update, construction activities would have the potential to result in emissions of ozone precursors and particulate matter, as discussed below.

Fugitive Dust

Project-related demolition, excavation, grading, and other construction activities may cause wind-blown dust that could contribute particulate matter into the local atmosphere. Although there are federal standards for air pollutants and implementation of state and regional air quality control plans, air pollutants continue to have impacts on human health throughout the country. California has found that particulate matter exposure can cause health effects at lower levels than national standards. The current health burden of particulate matter demands that, where possible, public agencies take feasible available actions to reduce sources of particulate matter exposure. According to the ARB, reducing particulate matter PM_{2.5} concentrations to state and federal standards of 12 µg/m³ in the San Francisco Bay Area would prevent between 200 and 1,300 premature deaths.⁶³

Dust can be an irritant causing watering eyes or irritation to the lungs, nose, and throat. Demolition, excavation, grading, and other construction activities can cause wind-blown dust that adds particulate matter to the local atmosphere. Depending on exposure, adverse health effects can occur due to this particulate matter in general and also due to specific contaminants such as lead or asbestos that may be constituents of soil.

In response, the San Francisco Board of Supervisors approved a series of amendments to the San Francisco Building and Health Codes generally referred hereto as the Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008) with the intent of reducing the quantity of dust generated during site preparation, demolition and construction work in order to protect the health of the general public and of onsite workers, minimize public nuisance complaints, and to avoid orders to stop work by the Department of Building Inspection (DBI).

The Ordinance requires that all site preparation work, demolition, or other construction activities within San Francisco that have the potential to create dust or to expose or disturb more than 10 cubic yards or 500 square feet of soil comply with specified dust control measures whether or not the activity requires a permit from DBI. The Director of DBI may waive this requirement for activities on sites less than one half-acre that are unlikely to result in any visible wind-blown dust.

⁶³ ARB, *Methodology for Estimating Premature Deaths Associated with Long-term Exposure to Fine Airborne Particulate Matter in California*, Staff Report, Table 4c, October 24, 2008.

In compliance with the Construction Dust Control Ordinance, the project sponsor and the contractor responsible for construction activities at the project site would be required to use the following practices to control construction dust on the site or other practices that result in equivalent dust control that are acceptable to the Director. Dust suppression activities may include watering all active construction areas sufficiently to prevent dust from becoming airborne; increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Reclaimed water must be used if required by Article 21, Section 1100 et seq. of the San Francisco Public Works Code. If not required, reclaimed water should be used whenever possible. Contractors shall provide as much water as necessary to control dust (without creating run-off in any area of land clearing, and/or earth movement). During excavation and dirt-moving activities, contractors shall wet sweep or vacuum the streets, sidewalks, paths, and intersections where work is in progress at the end of the workday. Inactive stockpiles (where no disturbance occurs for more than seven days) greater than 10 cubic yards or 500 square feet of excavated material, backfill material, import material, gravel, sand, road base, and soil shall be covered with a 10 mil (0.01 inch) polyethylene plastic (or equivalent) tarp, braced down, or use other equivalent soil stabilization techniques.

For projects over one half-acre, such as the proposed project, the Dust Control Ordinance requires that the project sponsor submit a Dust Control Plan for approval by the San Francisco Department of Public Health. DBI will not issue a building permit without written notification from the Director of Public Health that the applicant has a site-specific Dust Control Plan, unless the Director waives the requirement. Interior-only tenant improvement projects that are over one-half acre in size that will not produce exterior visible dust are exempt from the site-specific Dust Control Plan requirement.

The site-specific Dust Control Plan would require the project sponsor to: submit a map to the Director of Public Health showing all sensitive receptors within 1,000 feet of the site; wet down areas of soil at least three times per day; provide an analysis of wind direction and install upwind and downwind particulate dust monitors; record particulate monitoring results; hire an independent, third-party to conduct inspections and keep a record of those inspections; establish shut-down conditions based on wind, soil migration, etc.; establish a hotline for surrounding community members who may be potentially affected by project-related dust; limit the area subject to construction activities at any one time; install dust curtains and windbreaks on the property lines, as necessary; limit the amount of soil in hauling trucks to the size of the truck bed and securing with a tarpaulin; enforce a 15 mph speed limit for vehicles entering and exiting construction areas; sweep affected streets with water sweepers at the end of the day; install and utilize wheel washers to clean truck tires; terminate construction activities when winds exceed 25 miles per hour; apply soil stabilizers to inactive areas; and sweep off adjacent streets to reduce particulate emissions. The project sponsor would be required to designate an individual to monitor compliance with these dust control requirements.

Compliance with the regulations and procedures set forth by the San Francisco Dust Control Ordinance would ensure that potential dust-related air quality impacts that may result from the potential future construction associated with the implementation of the draft ROSE Update would be reduced to a level of insignificance.

Criteria Air Pollutants

As discussed above, construction activities would result in emissions of criteria air pollutants from the use of off- and on-road vehicles and equipment. To assist lead agencies in determining whether short-term construction-related air pollutant emissions require further analysis as to whether the project may exceed the criteria air pollutant significance thresholds shown in Table 1, above, the BAAQMD, in its *CEQA Air Quality Guidelines* (May 2011), developed screening criteria. If a proposed project meets the screening criteria, then construction of the proposed project would result in less-than-significant criteria air pollutant impacts. A project that exceeds the screening criteria may require a detailed air quality assessment to determine whether criteria air pollutant emissions would exceed significance thresholds. The *CEQA Air Quality Guidelines* note that the screening levels are generally representative of new development on greenfield⁶⁴ sites without any form of mitigation measures taken into consideration. In addition, the screening criteria do not account for project design features, attributes, or local development requirements that could also result in lower emissions.

Implementation of the draft ROSE Update would not directly involve construction activities that would generate criteria air pollutants. However, the draft Rose Update includes policies that may indirectly result in construction activities, such as ground-disturbing activities associated with park maintenance, streetscape improvements, or construction of recreational facilities. As discussed above, the Planning Department screens each of the future projects associated with the draft ROSE Update to determine whether the project's construction and operational criteria air pollutant emissions would be significant based on the criteria established by the BAAQMD. This screening and possibly detailed modeling would be required for specific projects that may be developed in parks or open spaces. Furthermore, these future construction activities would be subject to, and comply with, San Francisco's Clean Construction Ordinance (Ordinance No. 70-07), which requires public works projects to utilize equipment with engines that either meet or exceed Tier 2 standards for off-road engines or operates with the most effective ARB verified diesel emission control strategy. Each piece of construction-related equipment would result in between a 25 percent and 85 percent reduction in PM (which includes DPM) emissions from, as compared to pieces of equipment with uncontrolled or Tier 1 engines.⁶⁵ As such, implementation of the draft ROSE Update would not violate an air quality standard, would not contribute substantially to an existing or projected air quality violation, or would not result in a cumulatively considerable net increase in criteria air pollutants.

Impact AQ-2: Implementation of the draft ROSE Update would not expose sensitive receptors to substantial pollutant concentrations. (Less than Significant)

Implementation of the draft ROSE Update would not directly involve construction activities that would generate criteria air pollutants, nor would it introduce any new sensitive receptors (e.g.,

⁶⁴ A greenfield site refers to agricultural or forest land or an undeveloped site earmarked for commercial, residential, or industrial projects.

⁶⁵ The 25 percent reduction comes from comparing the ARB/USEPA PM emission standards for off-road engines between 25 hp and 50 hp for Tier 2 (0.45 grams per brake horsepower per hour (g/bhp-hr)) and Tier 1 (0.60 g/bhp-hr). The 85 percent reduction comes from requiring a Level 3 ARB verified emission control strategy.

residents) to parks or open spaces owned by the SFRPD. However, the draft Rose Update includes policies that may indirectly result in construction activities, such as ground-disturbing activities associated with park maintenance, streetscape improvements, or construction of recreational facilities.

Off-road equipment (which includes construction-related equipment) is a large contributor to DPM emissions in California, although since 2007, the ARB has found the emissions to be substantially lower than previously expected.⁶⁶ Newer and more refined emission inventories have substantially lowered the estimates of DPM emissions from off-road equipment such that off-road equipment is now considered the sixth largest source of DPM emissions in California.⁶⁷ This reduction in emissions is due, in part, to effects of the economic recession and refined emissions estimation methodologies. For example, revised particulate matter (PM) emission estimates for the year 2010, which DPM is a major component of total PM, have decreased by 83 percent from previous estimates for the SFBAAB.⁶⁸ Approximately half of the reduction can be attributed to the economic recession and approximately half can be attributed to updated assumptions independent of the economic recession (e.g., updated methodologies used to better assess construction emissions).⁶⁹

Additionally, a number of federal and state regulations are requiring cleaner off-road equipment. Specifically, both the USEPA and California have set emissions standards for new off-road equipment engines, ranging from Tier 1 to Tier 4. Tier 1 emission standards were phased in between 1996 and 2000 and Tier 4 Interim and Final emission standards for all new engines would be phased in between 2008 and 2015. To meet the Tier 4 emission standards, engine manufacturers will be required to produce new engines with advanced emission-control technologies. Although the full benefits of these regulations will not be realized for several years, the USEPA estimates that by implementing the federal Tier 4 standards, NO_x and PM emissions will be reduced by more than 90 percent.⁷⁰ Furthermore, California regulations limit maximum idling times to five minutes, which further reduces public exposure to DPM emissions.⁷¹

In addition, construction activities do not lend themselves to analysis of long-term health risks because of their temporary and variable nature. As explained in the BAAQMD's *CEQA Air Quality Guidelines*:

⁶⁶ ARB, *Staff Report: Initial Statement of Reasons for Proposed Rulemaking, Proposed Amendments to the Regulation for In-Use Off-Road Diesel-Fueled Fleets and the Off-Road Large Spark-Ignition Fleet Requirements*, p.1 and p. 13 (Figure 4), October 2010.

⁶⁷ ARB, *Staff Report: Initial Statement of Reasons for Proposed Rulemaking, Proposed Amendments to the Regulation for In-Use Off-Road Diesel-Fueled Fleets and the Off-Road Large Spark-Ignition Fleet Requirements*, October 2010.

⁶⁸ ARB, "In-Use Off-Road Equipment, 2011 Inventory Model," Query accessed online, April 2, 2012, http://www.arb.ca.gov/msei/categories.htm#inuse_or_category.

⁶⁹ ARB, *Staff Report: Initial Statement of Reasons for Proposed Rulemaking, Proposed Amendments to the Regulation for In-Use Off-Road Diesel-Fueled Fleets and the Off-Road Large Spark-Ignition Fleet Requirements*, October 2010.

⁷⁰ United State Environmental Protection Agency (USEPA), "Clean Air Nonroad Diesel Rule: Fact Sheet," May 2004.

⁷¹ California Code of Regulations, Title 13, Division 3, § 2485.

"Due to the variable nature of construction activity, the generation of TAC emissions in most cases would be temporary, especially considering the short amount of time such equipment is typically within an influential distance that would result in the exposure of sensitive receptors to substantial concentrations. Concentrations of mobile-source diesel PM emissions are typically reduced by 70 percent at a distance of approximately 500 feet (ARB 2005). In addition, current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of 9, 40, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities. This results in difficulties with producing accurate estimates of health risk."⁷²

Therefore, project-level analyses of construction activities have a tendency to produce overestimated assessments of long-term health risks. However, within the Air Pollutant Exposure Zone, as discussed above, additional construction activity may adversely affect populations that are already at a higher risk for adverse long-term health risks from existing sources of air pollution.

Although on-road heavy-duty diesel vehicles and off-road equipment would be used during construction of such future projects, emissions would be temporary and variable in nature and would not be expected to expose sensitive receptors to substantial air pollutants. Furthermore, the proposed project would be subject to, and would comply with, San Francisco's Clean Construction Ordinance and California regulations limiting idling to no more than five minutes, which would further reduce nearby sensitive receptors exposure to temporary and variable DPM emissions. Therefore, construction period TAC emissions would result in a less-than-significant impact to sensitive receptors.

As discussed above, the Planning Department screens each of these future projects to determine whether the project site is located in an identified Air Pollutant Exposure Zone and ensures that any conditions imposed by the decision body on the project are satisfied through the mitigation monitoring and reporting program (MMRP).

In light of the above, implementation of the draft ROSE Update would not expose sensitive receptors to substantial pollutant concentrations.

Impact AQ-3: The proposed project would not conflict with, or obstruct implementation of, the 2010 CAP. (Less than Significant).

The most recently adopted air quality plan for the SFBAAB is the 2010 CAP. The CAP is a road map that demonstrates how the San Francisco Bay Area will achieve compliance with the state ozone standards as expeditiously as practicable and how the region will reduce the transport of ozone and ozone precursors to neighboring air basins. In determining consistency with the CAP, this analysis considers whether the project would: (1) support the primary goals of the CAP, (2) include applicable control measures from the CAP, and (3) avoid disrupting or hindering implementation of control measures identified in the CAP.

⁷² BAAQMD, *CEQA Air Quality Guidelines*, May 2011, page 8-6.

The primary goals of the CAP are to: (1) reduce emissions and decrease concentrations of harmful pollutants, (2) safeguard the public health by reducing exposure to air pollutants that pose the greatest health risk, and (3) reduce greenhouse gas emissions. To meet the primary goals, the CAP recommends specific control measures and actions. These control measures are grouped into various categories and include stationary and area source measures, mobile source measures, transportation control measures, land use measures, and energy and climate measures. The CAP recognizes that to a great extent, community design dictates individual travel mode, and that a key long-term control strategy to reduce emissions of criteria pollutants, air toxics, and greenhouse gases from motor vehicles is to channel future Bay Area growth into vibrant urban communities where goods and services are close at hand, and people have a range of viable transportation options. To this end, the CAP includes 55 control measures aimed at reducing air pollution in the SFBAAB.

Implementation of the draft ROSE Update would not directly involve construction activities that would generate criteria air pollutants or TACs. While future construction projects associated with the draft ROSE Update may result in trips transporting construction materials or workers from or to project sites (primarily parks or open spaces), the total number of such trips would be substantially similar to that occurring under the current, 1986 ROSE. In addition, the draft ROSE Update would be generally consistent with the *San Francisco General Plan*, as discussed in Section C. Transportation control measures that are identified in the CAP are implemented by the *San Francisco General Plan* and the Planning Code, for example, through the City's Transit First Policy, bicycle parking requirements, and transit impact development fees. Compliance with these requirements would ensure the project includes relevant transportation control measures specified in the CAP. Therefore, the future construction projects associated with the draft ROSE Update would include applicable control measures identified in the CAP to meet the CAP's primary goals.

Examples of a project that could cause the disruption or delay of CAP control measures are projects that would preclude the extension of a transit line or bike path, or projects that propose excessive parking beyond parking requirements. The draft ROSE Update or future construction projects associated with the draft ROSE Update would not preclude the extension of a transit line or a bike path or result in excessive parking beyond parking requirements, and thus would not disrupt or hinder implementation of control measures identified in the CAP.

For the reasons described above, the proposed project would not interfere with implementation of the *2010 Clean Air Plan*, and because the proposed project would be consistent with the applicable air quality plan that demonstrates how the region will improve ambient air quality and achieve the state and federal ambient air quality standards, this impact would be less than significant.

Impact AQ-4: The proposed project would not create objectionable odors that would affect a substantial number of people. (Less than Significant)

Typical odor sources of concern include wastewater treatment plants, sanitary landfills, transfer stations, composting facilities, petroleum refineries, asphalt batch plants, chemical manufacturing facilities, fiberglass manufacturing facilities, auto body shops, rendering plants, and coffee roasting facilities. During construction, diesel exhaust from construction equipment would generate some odors. However, construction-related odors would be temporary and would not persist upon project completion.

Implementation of the draft ROSE Update or future construction projects associated with the draft ROSE Update would not result in any significant source of new odors. Therefore, odor impacts would be less than significant.

Cumulative Air Quality Impacts

Impact C-AQ: The proposed project, in combination with past, present, and reasonably foreseeable future development in the project area would result in less-than-significant cumulative air quality impacts. (Less than Significant)

As discussed above, regional air pollution is by its very nature largely a cumulative impact. Emissions from past, present and future projects contribute to the region's adverse air quality on a cumulative basis. No single project by itself would be sufficient in size to result in regional nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulative adverse air quality impacts.⁷³ The project-level thresholds for criteria air pollutants are based on levels by which new sources are not anticipated to contribute to an air quality violation or result in a considerable net increase in criteria air pollutants. The draft ROSE Upgrade in and of itself would not result in construction activities that would generate fugitive dust or emit criteria air pollutants or TACs. In addition, future construction activities associated with the draft ROSE Update would be substantially similar in nature and scope to those currently ongoing under the 1986 ROSE, the draft ROSE Upgrade would not be considered to result in a cumulatively considerable contribution to regional, construction air quality impacts.

Furthermore, the Planning Department screens each of these future projects to determine whether the project exceeds the criteria established by the BAAQMD and whether the project site is located in an identified Air Pollutant Exposure Zone and ensures that any conditions imposed by the decision body on the project are satisfied through the mitigation monitoring and reporting program (MMRP).

Given the above, the project's incremental increase in localized emissions of criteria air pollutants or TACs would not contribute substantially to cumulative criteria air pollutant or TAC emissions

⁷³ BAAQMD, *CEQA Air Quality Guidelines*, May 2011, page 2-1.

that could affect sensitive land uses. Therefore, cumulative air quality impacts would be considered less than significant.

<u>Topics:</u>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
8. GREENHOUSE GAS EMISSIONS— Would the project					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Environmental Setting

Gases that trap heat in the atmosphere are referred to as greenhouse gases (GHGs) because they capture heat radiated from the sun as it is reflected back into the atmosphere, much like a greenhouse does. The accumulation of GHG's has been implicated as the driving force for global climate change. The primary GHGs are carbon dioxide, methane, nitrous oxide, ozone, and water vapor.

Individual projects contribute to the cumulative effects of climate change by emitting GHGs during demolition, construction, and operational phases. While the presence of the primary GHGs in the atmosphere is naturally occurring, carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O) are largely emitted from human activities, accelerating the rate at which these compounds occur within earth's atmosphere. Emissions of carbon dioxide are largely by-products of fossil fuel combustion, whereas methane results from off-gassing associated with agricultural practices and landfills. Black carbon has recently emerged as a major contributor to global climate change, possibly second only to CO₂. Black carbon is produced naturally and by human activities as a result of the incomplete combustion of fossil fuels, biofuels and biomass.⁷⁴ N₂O is a byproduct of various industrial processes and has a number of uses, including use as an anesthetic and as an aerosol propellant. Other GHGs include hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride, and are generated in certain industrial processes. Greenhouse gases are typically reported in "carbon dioxide-equivalent" measures (CO₂E).⁷⁵

There is international scientific consensus that human-caused increases in GHGs have and will continue to contribute to global warming. Many impacts resulting from climate change, including

⁷⁴ Center for Climate and Energy Solutions. *What is Black Carbon?*, April 2010. Available online at <http://www.c2es.org/docUploads/what-is-black-carbon.pdf>. Accessed September 27, 2012.

⁷⁵ 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.

increased fires, floods, severe storms and heat waves, are occurring already and will only become more frequent and more costly.⁷⁶ Secondary effects of climate change are likely to include a global rise in sea level, impacts to agriculture, the state's electricity system, and native freshwater fish ecosystems, an increase in the vulnerability of levees in the Sacramento-San Joaquin Delta, changes in disease vectors, and changes in habitat and biodiversity.^{77,78}

The California Air Resources Board (ARB) estimated that in 2009 California produced about 457 million gross metric tons of CO₂E (MMTCO₂E).⁷⁹ The ARB found that transportation is the source of 38 percent of the State's GHG emissions, followed by electricity generation (both in-state generation and imported electricity) at 23 percent and industrial sources at 18 percent. Commercial and residential fuel use (primarily for heating) accounted for nine percent of GHG emissions.⁸⁰ In the Bay Area, the transportation (on-road motor vehicles, off-highway mobile sources, and aircraft) and industrial/commercial sectors were the two largest sources of GHG emissions, each accounting for approximately 36 percent of the Bay Area's 95.8 MMTCO₂E emitted in 2007.⁸¹ Electricity generation accounts for approximately 16 percent of the Bay Area's GHG emissions followed by residential fuel usage at seven percent, off-road equipment at three percent and agriculture at one percent.⁸²

Regulatory Setting

In 2005, in recognition of California's vulnerability to the effects of climate change, then-Governor Schwarzenegger established Executive Order (EO) S-3-05, which sets forth a series of target dates by which statewide emissions of GHGs would be progressively reduced, as follows: by 2010, reduce GHG emissions to 2000 levels (approximately 457 MMTCO₂E); by 2020, reduce emissions to 1990 levels (estimated at 427 MMTCO₂E); and by 2050 reduce statewide GHG emissions to 80 percent below 1990 levels (approximately 85 MMTCO₂E).

In response, the California legislature passed Assembly Bill No. 32 in 2006 (California Health and Safety Code Division 25.5, Sections 38500, et seq., or AB 32), also known as the Global Warming Solutions Act. AB 32 requires ARB to design and implement emission limits, regulations, and

⁷⁶ California Climate Change Portal. Available online at <http://www.climatechange.ca.gov>. Accessed September 25, 2012.

⁷⁷ California Climate Change Portal. Available online at <http://www.climatechange.ca.gov>. Accessed September 25, 2012.

⁷⁸ California Energy Commission. California Climate Change Center. *Our Changing Climate 2012*. Available online at <http://www.energy.ca.gov/2012publications/CEC-500-2012-007/CEC-500-2012-007.pdf>. Accessed August 21, 2012.

⁷⁹ ARB. *California Greenhouse Gas Inventory for 2000-2009 — by Category as Defined in the Scoping Plan*. Available online at http://www.arb.ca.gov/cc/inventory/data/tables/ghg_inventory_scopingplan_00-09_2011-10-26.pdf. Accessed August 21, 2012.

⁸⁰ ARB. *California Greenhouse Gas Inventory for 2000-2009 — by Category as Defined in the Scoping Plan*. Available online at http://www.arb.ca.gov/cc/inventory/data/tables/ghg_inventory_scopingplan_00-09_2011-10-26.pdf. Accessed August 21, 2012.

⁸¹ BAAQMD. *Source Inventory of Bay Area Greenhouse Gas Emissions: Base Year 2007*, February 2010. Available online at http://www.baaqmd.gov/-/media/Files/Planning%20and%20Research/Emission%20Inventory/regionalinventory2007_2_10.aspx. Accessed August 21, 2012.

⁸² BAAQMD. *Source Inventory of Bay Area Greenhouse Gas Emissions: Base Year 2007, Updated: February 2010*. Available online at http://www.baaqmd.gov/-/media/Files/Planning%20and%20Research/Emission%20Inventory/regionalinventory2007_2_10.aspx. Accessed August 21, 2012.

other measures, such that feasible and cost-effective statewide GHG emissions are reduced to 1990 levels by 2020 (representing a 25 percent reduction from forecast emission levels).⁸³

Pursuant to AB 32, ARB adopted a Scoping Plan in December 2008, outlining measures to meet the 2020 GHG reduction limits. The Scoping Plan is the State's overarching plan for addressing climate change. In order to meet these goals, California must reduce its GHG emissions by 30 percent below projected 2020 business as usual emissions levels, or about 15 percent from 2008 levels.⁸⁴ The Scoping Plan estimates a reduction of 174 million metric tons of CO₂E (MMT CO₂E) (about 191 million U.S. tons) from the transportation, energy, agriculture, forestry, and high global warming potential sectors, see Table 6, below. ARB has identified an implementation timeline for the GHG reduction strategies in the Scoping Plan.⁸⁵

Table 6. GHG Reductions from the AB 32 Scoping Plan Sectors^{86,87}

GHG Reduction Measures By Sector	GHG Reductions (MMT CO ₂ E)
Transportation Sector	62.3
Electricity and Natural Gas	49.7
Industry	1.4
Landfill Methane Control Measure (Discrete Early Action)	1
Forestry	5
High Global Warming Potential GHGs	20.2
Additional Reductions Needed to Achieve the GHG Cap	34.4
Total	174
Other Recommended Measures	
Government Operations	1-2
Methane Capture at Large Dairies	1
Additional GHG Reduction Measures:	
Water	4.8
Green Buildings	26
High Recycling/ Zero Waste	
• Commercial Recycling	
• Composting	
• Anaerobic Digestion	9
• Extended Producer Responsibility	
• Environmentally Preferable Purchasing	
Total	41.8-42.8

⁸³ Governor's Office of Planning and Research (OPR). *Technical Advisory- CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review*, June 19, 2008. Available online at: <http://opr.ca.gov/docs/june08-ceqa.pdf>. Accessed August 21, 2012.

⁸⁴ ARB. *California's Climate Plan: Fact Sheet*. Available online at: http://www.arb.ca.gov/cc/facts/scoping_plan_fs.pdf. Accessed August 21, 2012.

⁸⁵ ARB. *Assembly Bill 32: Global Warming Solutions Act*. Available online at: <http://www.arb.ca.gov/cc/lab32/ab32.html>. Accessed August 21, 2012.

⁸⁶ ARB. *Climate Change Scoping Plan*, December 2008. Available online at: http://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf. Accessed August 21, 2012.

⁸⁷ ARB. *California's Climate Plan: Fact Sheet*. Available online at: http://www.arb.ca.gov/cc/facts/scoping_plan_fs.pdf. Accessed August 21, 2012.

The AB 32 Scoping Plan recommendations are intended to curb projected business-as-usual growth in GHG emissions and reduce those emissions to 1990 levels. Therefore, meeting AB 32 GHG reduction goals would result in an overall annual net decrease in GHGs as compared to current levels and accounts for projected increases in emissions resulting from anticipated growth.

The Scoping Plan also relies on the requirements of Senate Bill 375 (SB 375) to implement the carbon emission reductions anticipated from land use decisions. SB 375 was enacted to align local land use and transportation planning to further achieve the State's GHG reduction goals. SB 375 requires regional transportation plans, developed by Metropolitan Planning Organizations (MPOs), to incorporate a "sustainable communities strategy" in their regional transportation plans (RTPs) that would achieve GHG emission reduction targets set by ARB. SB 375 also includes provisions for streamlined CEQA review for some infill projects such as transit-oriented development. SB 375 would be implemented over the next several years and the Bay Area Metropolitan Transportation Commission's 2013 RTP, Plan Bay Area, would be its first plan subject to SB 375.

AB 32 further anticipates that local government actions will result in reduced GHG emissions. ARB has identified a GHG reduction target of 15 percent from current levels for local governments themselves and noted that successful implementation of the Scoping Plan relies on local governments' land use planning and urban growth decisions because local governments have the primary authority to plan, zone, approve, and permit land development to accommodate population growth and the changing needs of their jurisdictions.⁸⁸ The BAAQMD has conducted an analysis of the effectiveness of the region in meeting AB 32 goals from the actions outlined in the Scoping Plan and determined that in order for the Bay Area to meet AB 32 GHG reduction goals, the Bay Area would need to achieve an additional 2.3 percent reduction in GHG emissions from the land use driven sector.⁸⁹

At a local level, the City has developed a number of plans and programs to reduce the City's contribution to global climate change. San Francisco's GHG reduction goals, as outlined in the 2008 Greenhouse Gas Reduction ordinance are as follows: by 2008, determine the City's GHG emissions for the year 1990, the baseline level with reference to which target reductions are set; by 2017, reduce GHG emissions by 25 percent below 1990 levels; by 2025, reduce GHG emissions by 40 percent below 1990 levels; and finally by 2050, reduce GHG emissions by 80 percent below 1990 levels. San Francisco's Greenhouse Gas Reduction Strategy documents the City's actions to pursue cleaner energy, energy conservation, alternative transportation and solid waste policies. As identified in the Greenhouse Gas Reduction Strategy, the City has implemented a number of mandatory requirements and incentives that have measurably reduced GHG emissions including, but not limited to, increasing the energy efficiency of new and existing buildings,

⁸⁸ ARB. *Climate Change Scoping Plan*. December 2008. Available online at: http://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf. Accessed August 21, 2012.

⁸⁹ BAAQMD. *California Environmental Quality Act Guidelines Update, Proposed Thresholds of Significance*, December 2009. Available online at: <http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/CEQA/Proposed%20Thresholds%20of%20Significance%20Dec%207%2009.ashx>. Accessed September 25, 2012.

installation of solar panels on building roofs, implementation of a green building strategy, adoption of a zero waste strategy, a construction and demolition debris recovery ordinance, a solar energy generation subsidy, incorporation of alternative fuel vehicles in the City's transportation fleet (including buses), and a mandatory recycling and composting ordinance.

The Greenhouse Gas Reduction Strategy concludes that San Francisco's policies and programs have resulted in a reduction in GHG emissions below 1990 levels, exceeding statewide AB 32 GHG reduction goals. San Francisco's communitywide 1990 GHG emissions were approximately 6,201,949 MTCO₂E. As stated above, San Francisco GHG emissions in 2010 were 5,299,757 MTCO₂E, which is a 14.5 percent reduction in GHG emissions compared to 1990 levels. The reduction has largely come from the electricity sector, from 2,032,085 MTCO₂E (year 1990) to 1,333,959 MTCO₂E (year 2010), and waste sector, from 472,646 MTCO₂E (year 1990) to 244,625 MTCO₂E (year 2010).⁹⁰

Approach to Analysis

GHG emissions and global climate change represent cumulative impacts. GHG emissions contribute, on a cumulative basis, to the significant adverse environmental impacts of global climate change. No single project could generate enough GHG emissions to noticeably change the global average temperature; the combination of GHG emissions from past, present, and future projects have contributed to global climate change and its associated environmental impacts. There does not currently appear to be a consensus in the scientific community as to when and under what circumstances a project's incremental contribution to climate change would be considered cumulatively considerable.

CEQA Guidelines Sections 15064.4 and 15183.5 address the analysis and determination of significant impacts from a proposed project's GHG emissions. CEQA Guidelines Section 15064.4 allows lead agencies to rely on a qualitative analysis to describe GHG emissions resulting from a project. CEQA Guidelines Section 15183.5 allows for public agencies to analyze and mitigate GHG emissions as part of a larger plan for the reduction of greenhouse gases and describes the required contents of such a plan. Consistent with these sections, San Francisco has prepared its own Greenhouse Gas Reduction Strategy (described above). The BAAQMD has reviewed San Francisco's Greenhouse Gas Reduction Strategy, concluding that "Aggressive GHG reduction targets and comprehensive strategies like San Francisco's help the Bay Area move toward reaching the State's AB 32 goals, and also serve as a model from which other communities can learn."⁹¹

Consistent with CEQA Guidelines Sections 15064.4 and 15183.5, the GHG analysis below includes a qualitative assessment of GHG emissions that would result from a proposed project

⁹⁰ San Francisco Department of Environment (SFDOE). *San Francisco Community -Wide Carbon Emissions by Category, Excel spreadsheet provided via email between Pansy Gee, SFDOE and Wade Wietgreffe, San Francisco Planning Department*, June 7, 2013.

⁹¹ BAAQMD. Letter from J. Roggenkamp, BAAQMD, to B. Wycko, San Francisco Planning Department, October 28, 2010. Available online at: http://www.sf-planning.org/ftp/files/MEA/GHG-Reduction_Letter.pdf. Accessed September 24, 2012.

and an assessment of the proposed project's compliance with San Francisco's Greenhouse Gas Reduction Strategy.

Given that the City's local greenhouse gas reduction targets are more aggressive than the State and Region's 2020 GHG reduction targets and consistent with the long-term 2050 reduction targets, the City's Greenhouse Gas Reduction Strategy is consistent with the goals of EO S-3-05, AB 32, and the Bay Area 2010 Clean Air Plan. Therefore, proposed projects that are consistent with the City's Greenhouse Gas Reduction Strategy would be consistent with the goals of EO S-3-05, AB 32, and the Bay Area 2010 Clean Air Plan, would not conflict with these plans, and would therefore not exceed San Francisco's applicable GHG threshold of significance.

The following analysis of the proposed project's impact on climate change focuses on the project's contribution to cumulatively significant GHG emissions. Given that the analysis is in a cumulative context and that implementation of the draft ROSE Upgrade does not involve construction activities that would emit GHGs, this section does not include an individual project-specific impact statement.

Impact C-GG: The proposed project would generate greenhouse gas emissions, but not at levels that would result in a significant impact on the environment or conflict with any policy, plan, or regulation adopted for the purpose of reducing greenhouse gas emissions. (Less than Significant)

Individual projects contribute to the cumulative effects of climate change by directly or indirectly emitting GHGs during construction and operational phases. Direct operational emissions include GHG emissions from new vehicle trips and area sources (natural gas combustion). Indirect emissions include emissions from electricity providers, energy required to pump, treat, and convey water, and emissions associated with waste removal, disposal, and landfill operations.

Implementation of the draft ROSE Update is a regulatory program and in and of itself would not directly involve construction activities that would generate GHGs. The draft ROSE Update's objectives and policies seek to ensure that all of the City's parks and open spaces are high performing and satisfactorily maintained, and are part of a unified and connected open space system that provide a high level of service to their users with numerous amenities. About one-half of the objectives and policies in the draft ROSE Update correlate to existing policies and objectives in the current ROSE, meaning that the draft ROSE Update policies are substantially similar to those in the existing ROSE. Furthermore, in instances where new objectives and policies are introduced, these typically relate to sustainability and environmental stewardship (Objectives 4 and 5), as well as funding and management (Objective 6). Based on this, implementation of the draft ROSE Update would not conflict with the City's Greenhouse Gas Reduction Strategy.

The draft ROSE Update includes policies that may indirectly result in construction activities, which would emit GHGs. These construction activities include ground-disturbing activities associated with park maintenance, streetscape improvements, or construction of recreational facilities. Therefore, the draft ROSE Update could indirectly contribute to annual long-term

increases in GHGs as a result of increased vehicle trips (mobile sources) and operation and maintenance of recreational facilities that result in an increase in energy use, water use, wastewater treatment, and solid waste disposal. Construction activities could also result in temporary increases in GHG emissions.

The future construction activities that may result from the implementation of the draft ROSE Update would be subject to project-specific review and may be required to comply with several regulations adopted to reduce GHG emissions as identified in the GHG Reduction Strategy and the RPD's Climate Action Plan.

The regulations in the GHG Reduction Strategy, as outlined in San Francisco's *Strategies to Address Greenhouse Gas Emissions*, have proven effective as San Francisco's GHG emissions have measurably reduced when compared to 1990 emissions levels, demonstrating that the City has met and exceeded EO S-3-05, AB 32, and the Bay Area 2010 Clean Air Plan GHG reduction goals for the year 2020. Other existing regulations, such as those implemented through AB 32, will continue to reduce a proposed project's contribution to climate change. Therefore, GHG emissions resulting from future projects that are associated with the draft ROSE Update would not conflict with state, regional, and local GHG reduction plans and regulations, and thus such future projects' contribution to GHG emissions would not be cumulatively considerable or generate GHG emissions, either directly or indirectly, that would have a significant impact on the environment.

In light of the above, implementation of the draft ROSE Update would result in a less-than-significant impact with respect to GHG emissions. In general, city parks do not contribute substantially to GHG emissions. No mitigation measures are necessary.

<u>Topics:</u>	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>	<u>Not Applicable</u>
9. WIND AND SHADOW—Would the project:					
a) Alter wind in a manner that substantially affects public areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact WS-1: The draft ROSE Update would not alter wind in a matter that substantially affects public areas. (Less than Significant)

Wind impacts are generally caused by large building masses extending substantially above neighboring buildings, and by buildings oriented such that a new large wall catches a prevailing wind, particularly if such a wall contains little or no articulation. Average wind speeds in San Francisco are greatest in summer and least in the fall. Winds also exhibit a diurnal variation with the strongest winds occurring in the afternoon and the lightest winds occurring in the early

morning. Winds in the City occur most frequently from the west to northwest directions, reflecting the persistence of sea breezes. Wind direction is most variable in the winter.⁹² The approach of winter storms often results in southerly winds. Although not as frequent as westerly winds, these southerly winds are often strong. The strongest winds in the City are typically from the south during the approach of a winter storm.

Winds vary at pedestrian levels within a city. In San Francisco wind strength is generally greater, on average, along streets that run east-west as buildings tend to channel westerly winds along these streets.⁹³ Streets running north-south tend to have lighter winds, on average, due to the shelter offered by buildings on the west side of the street. Within the City, the streets systems north of Market Street and portions of the systems south of Market Street (including those in the Mission District, Potrero Hill, Mission Bay, and Central Waterfront) are mainly on a north/south and east/west grid. However, portions of the street systems south of Market Street (including those in South of Market, South Beach, Bayview Hunters Point, and Visitacion Valley) are mainly northwest/southeast and southwest/northeast, which results in a less predictable pattern of wind variation at the pedestrian level.

New construction could result in wind impacts if future buildings were constructed in a manner that would increase ground-level wind speeds. Typically, new development greater than 85 feet in height could potentially affect ground level wind speeds. Buildings that would result in wind speeds that exceed the hazard criterion of 26 miles per hour (mph) for one hour of the year would result in a significant wind impact.

The Planning Department evaluates potential wind impacts on a project-level basis, and generally evaluates wind effects by using the wind hazard criterion to determine CEQA significance. Any new building or addition that would cause wind speeds to exceed the hazard level of 26-mph-equivalent wind speed (as defined in the Planning Code) more than one hour of any year must be modified and is subject to the relevant wind hazard criterion.⁹⁴ Buildings below 85 feet generally do not have the potential to affect wind speeds. Buildings that extend in height above surrounding development have more impact than those of similar height to surroundings. As noted in Section E.1, Land Use, p. 35, existing controls would regulate the type of buildings and/or additions in public spaces, including parks.

The draft ROSE Update does not include any policy or objective that could in and of itself result in adverse wind effects. To the extent that future recreation buildings or the like could be proposed within parks or recreational areas, the potential for adverse wind effects would be assessed in conjunction with the particular proposal. However, buildings and structures within parks are typically far below the height necessary to create substantial wind impacts. Thus, implementation of the draft ROSE Update would not result in significant wind impacts.

92 *Market and Octavia Neighborhood Plan Final EIR*, page 4-14, adopted September 2007. This document is available for review at the Planning Department as part of Case File No. 2003.0347E

93 *Ibid.*

94 "Equivalent wind speed" is defined as an hourly mean wind speed adjusted to incorporate the effects of gustiness or turbulence on pedestrians. San Francisco Planning Code Section 148(b).

Impact WS-2: The draft ROSE Update would not create new shadow in a manner that could substantially affect outdoor recreation facilities or other public areas. (Less than Significant)

Section 295 of the Planning Code was adopted in response to Proposition K (passed November 1984) in order to protect certain public open spaces from shadowing by new structures during the period between one hour after sunrise and one hour before sunset, year round. Section 295 restricts new shadow upon public spaces under the jurisdiction of the RPD by any structure exceeding 40 feet unless the City Planning Commission finds the impact to be insignificant.

In general, all applications for new construction or additions to existing buildings above 40 feet in height must be reviewed to determine whether a project would cast additional shadows on properties under the jurisdiction of, or designated to be acquired by the RPD. In this case, the Planning Department develops a "shadow fan" diagram that shows the maximum extent of the shadows cast by a proposed building throughout the year, between one hour after sunrise and one hour before sunset. If the shadow fan indicates a project shadow does not reach any property protected by Planning Code Section 295 (the sunlight ordinance), no further review related to such properties is required. If the shadow fan shows that a project has potential to shade such properties, further analysis is required.

Furthermore, the Code regulates sunlight access on particular downtown street segments during certain daytime hours. Specifically, Planning Code Section 146(a) includes sunlight access criteria to allow direct sunlight to reach sidewalk areas of designated streets during critical hours of the day. In the case of sidewalks, the critical hours are considered to be midday hours. The Code designates 18 streets within the project area (all near the Downtown) as subject to Section 146(a). Individual projects within downtown must comply with Section 146(a) requirements, or obtain an allowable exception under Section 309 of the Code.

The Code Section 146(c) includes sunlight access criteria to reduce substantial shadow impacts on public sidewalks in the C-3 Districts other than those protected by Section 146(a). New buildings and additions to existing structures must minimize any substantial shadow impacts in the C-3 (Downtown) Districts not protected under Subsection (a), as long as this can be accomplished without the creation of unattractive building design and the undue restriction of development potential. The Code Section 147 states that new buildings and additions to existing buildings in C-3, South of Market Mixed Use, and Eastern Neighborhoods Mixed Use Districts where the building height exceeds 50 feet shall be shaped, consistent with the dictates of good design and without unduly restricting the development potential of the site in question, to reduce substantial shadow impacts on public plazas and other publicly accessible spaces other than those protected under Section 295.

Existing ROSE Policy 2.3 calls for "Preserv[ing] sunlight in public open spaces." The draft ROSE Update proposes the identical policy (Policy 1.9). To the extent that future recreation buildings could be proposed on parks or in recreational areas (or on sites adjacent to such spaces), the potential for adverse shadow effects would be assessed in conjunction with the particular proposal; the draft ROSE Update neither alters Policy 2.3 in the existing ROSE, nor would otherwise amend the Planning Department's procedures regarding the review of shadow effects.

Therefore, the draft ROSE Update would not create shadow in a manner that substantially affects outdoor recreation facilities or other public areas.

In light of the above, the draft ROSE Update would not result significant shadow impacts.

Impact C-WS: Implementation of the draft ROSE Update, in combination with other past, present or reasonably foreseeable projects, would not result in less-than-significant wind and shadow impacts. (Less than Significant)

As of February 2014, there are no known past, present, or reasonably foreseeable projects in or near parks and open spaces under the jurisdiction of the RPD that would interact with the proposed project to result in cumulative significant impacts with respect to wind or shadow. Reasonably foreseeable future projects in or near parks and open spaces under the jurisdiction of the RPD include projects related to the 2008 Clean and Safe Parks Bond,⁹⁵ the 2012 Parks Bond,⁹⁶ the SNRAM, and several athletic field renovations. These projects primarily involve renovation of existing parks and open spaces.

As a policy document, the ROSE would not directly result in physical impacts, and would not be expected to result in indirect impacts that would demonstrably contribute considerably to cumulative impacts from projects affecting or in the vicinity of open space and recreation resources. Implementation of the draft ROSE Update would result in less-than-significant shadow and wind impacts and would not contribute considerably to adverse shadow and wind effects under cumulative conditions. For the reasons discussed above, the proposed project's impacts related to shadow and wind, both individually and cumulatively, would be less than significant.

<u>Topics:</u>	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>	<u>Not Applicable</u>
10. RECREATION—Would the project					
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Physically degrade existing recreational resources?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

⁹⁵ SFRPD. 2008 Clean and Safe Parks Bond. Available online at: <http://sfrecpark.org/park-improvements/2008-clean-safe-bond/>. Accessed February 19, 2014.

⁹⁶ SFRPD. 2012 Parks Bond. Available online at: <http://sfrecpark.org/park-improvements/2012-bond/>. Accessed February 19, 2014.

Impact RE-1: The draft ROSE Update policies would not cause substantial physical deterioration of citywide parks or otherwise physically degrade existing recreational resources. (Less than Significant)

The draft ROSE Update's objectives and policies seek to ensure that all of the City's parks and open spaces are high performing and satisfactorily maintained, and are part of a unified and connected open space system that provide a high level of service to their users with numerous amenities.

The draft ROSE Update includes objectives and policies that address maintenance and physical deterioration of existing park and recreational facilities, including Policy 1.2 ("Prioritize renovation of highly-utilized open spaces in high needs areas."); Policy 1.4 ("Maintain and repair open spaces to modern maintenance standards."); Policy 1.6 ("Support the continued improvement of Golden Gate Park while preserving the beauty of its naturalistic landscape."); Policy 3.6 ("Maintain, restore, expand and fund the urban forest."); Objective 4 "Protect and enhance the biodiversity, habitat value, and ecological integrity of open spaces."; and Policy 4.3 ("Integrate the protection and restoration of local biodiversity into all open space construction, renovation, management and maintenance using environmentally sustainable design principles."); and Policy 4.4 ("Include environmentally sustainable practices in construction, renovation, management and maintenance of open space and recreation facilities.")

The draft ROSE Update, a regulatory program, would not directly physically degrade any recreational resources citywide. The draft ROSE Update includes policies that call for maintaining and repairing facilities to the highest level of quality and encourage long-term resources and management for open space acquisition, operations and maintenance. As such, implementation of the ROSE Update would result in less-than-significant physical impacts to recreational resources, both individually and cumulatively.

Impact RE-2: The draft ROSE Update would not entail construction or expansion of recreational facilities that might have an adverse physical effect on the environment. (No Impact)

The ROSE provides the goals, objectives and policies that guide open space development, acquisition and priorities for San Francisco over a roughly 25-year future timeframe. If adopted the draft ROSE Update would supersede the City's existing, 1986 ROSE that was enacted in 1986. As described in the project description of this Initial Study, no specific recreation and/or park projects are proposed as part of the draft ROSE Update.

Future projects resulting from the draft ROSE Update will be subject to project-specific environmental review, in order to evaluate the potential of the specific undertaking to have an adverse physical effect on the environment. However, the policies included in the draft ROSE Update, including the implementation actions described above, would not result in adverse physical environmental impacts. Thus, implementation of the draft ROSE Update, therefore would have a less-than-significant impact on recreational facilities.

Impact C-RE: Implementation of the draft ROSE Update, in combination with past, present, and reasonable foreseeable future projects, would not considerably contribute to recreation impacts in the project site vicinity. (Less than Significant)

As of February 2014, there are no known past, present, or reasonably foreseeable projects in or near parks and open spaces under the jurisdiction of the RPD that would interact with the proposed project to result in cumulative significant recreation impacts. Reasonably foreseeable future projects in or near parks and open spaces under the jurisdiction of the RPD include projects related to the 2008 Clean and Safe Parks Bond,⁹⁷ the 2012 Parks Bond,⁹⁸ the SNRAMP, and several athletic field renovations. These projects primarily involve renovation of existing parks and open spaces.

As a policy document, the ROSE would not directly result in physical impacts, and would not be expected to result in indirect impacts that would demonstrably contribute considerably to cumulative impacts from projects affecting or in the vicinity of open space and recreational resources. As stated above, implementation of the draft ROSE Update would not noticeably increase the use of existing neighborhood parks or other recreational facilities; would not require the construction of recreational facilities; and would not physically degrade existing recreation facilities. Furthermore, the contribution of the proposed project to cumulative recreation-related impacts would not be considerable. For the reasons discussed above, the proposed project's impacts related to recreation, both individually and cumulatively, would be less than significant.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
11. UTILITIES AND SERVICE SYSTEMS—					
Would the project:					
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

⁹⁷ SFRPD. 2008 Clean and Safe Parks Bond. Available online at: <http://sfrecpark.org/park-improvements/2008-clean-safe-bond/>. Accessed February 19, 2014.

⁹⁸ SFRPD. 2012 Parks Bond. Available online at: <http://sfrecpark.org/park-improvements/2012-bond/>. Accessed February 19, 2014.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
d) Have sufficient water supply available to serve the project from existing entitlements and resources, or require new or expanded water supply resources or entitlements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider that would serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact UT-1: Implementation of the draft ROSE Update would result in a less-than-significant impact to wastewater collection and treatment facilities and would not require or result in the construction of new stormwater drainage facilities or expansion of existing facilities. (No Impact)

The City requires National Pollutant Discharge Elimination System (NPDES) permits, as administered by the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB), according to federal regulations for both point source discharges (a municipal or industrial discharge at a specific location or pipe) and nonpoint source discharges (diffuse runoff of water from adjacent land uses) to surface waters of the U.S. For point source discharges, such as sewer outfalls, each NPDES permit contains limits on allowable concentrations and mass emissions of pollutants contained in the discharge.

The policies in the draft ROSE Update would not directly result in the construction of new parks or recreational facilities, but would serve to guide how and where the development and maintenance of these uses should occur in the future. Subsequent construction activities would be required to comply with all provisions of the NPDES program, as enforced by the SFBRWQCB. Therefore, the proposed draft ROSE Update would not directly result in an exceedance of wastewater treatment requirements. Additionally, the NPDES Phase I and Phase II requirements would regulate discharge from construction sites. Future recreation and park development would be required to comply with all applicable wastewater discharge requirements issued by the State Water Resources Control Board (SWRCB) and SFBRWQCB. The policies and objectives in the draft ROSE Update would also not conflict with the City's Green Building Ordinance. This ordinance addresses stormwater management by seeking to reduce impervious cover, promote infiltration, and capture and treat 90 percent of the runoff from an average annual rainfall event using acceptable Best Management Practices.

In addition, subsequent projects would also be subject to the Stormwater Management Ordinance (SMO), which became effective on May 22, 2010. This ordinance requires that any project resulting in a ground disturbance of 5,000 square feet or greater prepare a Stormwater Control Plan (SCP), consistent with the November 2009 Stormwater Design Guidelines (SDG). Responsibility for approval of the SCP is with the SFPUC Wastewater Enterprise, Urban Watershed Management Program (UWMP); or if a project is located on Port property, with the Port. The ordinance requires compliance with the Stormwater Design Guidelines (SDG).

As per the requirements of the SDG, projects must achieve the performance requirements of LEED Sustainable Sites (SS) c6.1, "Stormwater Design: Quantity Control," which require implementation of stormwater management approaches to prevent stormwater runoff flow rate and volume from exceeding existing conditions for the one- and two-year 24-hour design storm. For projects with impervious areas greater than 50 percent, a stormwater management approach must be implemented that reduces existing stormwater runoff flow rate and volume by 25 percent for a two-year 24-hour design storm. Projects are required to minimize disruption of natural hydrology by implementing Low Impact Design approaches such as reduced impervious cover, reuse of stormwater, or increased infiltration. This in turn would limit the incremental demand on both the collection system and wastewater facilities resulting from stormwater discharges, and minimize the potential for upsizing or constructing new facilities.

The SFPUC is currently developing a Sewer System Improvement Program (SSIP) to address anticipated infrastructure issues, to meet anticipated regulatory requirements, as well as to accommodate planned growth.⁹⁹ Projections for sewer service demand were assessed to 2030 to determine future population, flows, and loads based on 1) population information provided by the ABAG and accepted by the Planning Department; 2) flows projected by the SFPUC based on water usage within the city; and 3) flows projected by the outside agencies that are discharging into San Francisco's sewer system based on agreements made with the USEPA during the grants programs of the 1970s and 1980s. Implementation of the draft ROSE Update would not conflict with the Sewer System Master Plan nor would be expected to exceed applicable wastewater treatment requirements of the SFBRWQCB with respect to discharges to the sewer system or stormwater system within the City. Therefore, the draft ROSE Update would have a less than significant impact with respect to the exceedance of wastewater treatment requirements.

Impact UT-2: The City projects that there would be sufficient water supplies and entitlements to serve anticipated citywide population growth; implementation of the draft ROSE Update would not require expansion or construction of new water treatment facilities. (Less than Significant)

The SFPUC provides water to approximately 2.4 million people in San Francisco, Santa Clara, Alameda, San Mateo, and Tuolumne Counties. Approximately 96 percent of the water provided to San Francisco is supplied by the SFPUC Regional Water System, which is made up of water

⁹⁹ SFPUC. *Sewer System Improvement Program (SSIP)*. Available online at: <http://www.sfwater.org/index.aspx?page=116>. Accessed February 18, 2014.

from the Hetch Hetchy Reservoir and Bay Area reservoirs in the Alameda Creek and Peninsula watersheds.¹⁰⁰

Citywide water use in the year 2000 was approximately 84 million gallons per day (mgd), of which about 57 percent was for residential customers and about 34 percent for business. System-wide demand from both retail and wholesale customers is projected to increase to about 300 mgd by 2030. Residential water demand in San Francisco is expected to decrease slightly between 2000 and 2030, in spite of a projected increase in the City's population, because of an anticipated decrease in household size and an increased use of water-efficient plumbing fixtures.

The 2010 Urban Water Management Plan (UWMP) for the City projects that, during normal precipitation years, the SFPUC will have adequate supplies to meet projected demand.¹⁰¹ During multiple dry years, however, additional water sources will be required. To address this issue, the SFPUC initiated the multi-year program Water System Improvement Program (WSIP) to rebuild and upgrade the water system and is currently implementing the WSIP to provide improvements to its water infrastructure. The SFPUC also is developing an Integrated Water Resource Plan, a planning document detailing how long-term water demand can also be met through a mix of water supply options (such as groundwater, recycled water, conservation, and imported water).

Future parks and recreational facilities could increase demand for water resources primarily associated with irrigation for landscaping. The RPD is the biggest user of water in the city, with an annual total usage of 691 million gallons. According to the UWMP, approximately 2.5 mgd of ground water are used for irrigation purposes.

In recognition of water demands associated with irrigation, the SFPUC is seeking to reduce reliance on potable water for nonpotable uses through the production and distribution of highly treated recycled water through the development of the Westside Water Project. The project objective is to meet the current demands of several SFPUC customers with substantial irrigation demands, including Golden Gate Park, Lincoln Park/Lincoln Park Golf Course (Lincoln Park), and the Presidio Golf Course. Together, the recycled water demand for these customers is estimated at 1.6 mgd (annual average). The project would be sized to accommodate peak-day demands of up to 4.5 mgd (or 2.0 mgd annual average) in anticipation that the facility could also provide future service to other nearby parks or irrigated medians. The project would involve the construction of a recycled water treatment facility and underground storage, and construction of and/or upgrades to distribution facilities (pipelines and pumping facilities) for service to these customers. The project is currently undergoing environmental review and the system is estimated to be completed by 2015.¹⁰² Planning and feasibility of other possible projects as part of

¹⁰⁰ Information related to water supply and summarized from *San Francisco 2004 and 2009 Housing Element Final Environmental Impact Report*, Case No. 2007.1275E and *Water System Improvement Program Final Environmental Impact Report*, Case No. 2005.0159E. These documents are available for review at the Planning Department, 1650 Mission Street, Suite 400.

¹⁰¹ *2010 Urban Water Management Plan for the City and County of San Francisco*, San Francisco Public Utilities Commission, June 2011. This document is available for review at <http://www.sfwater.org>.

¹⁰² *San Francisco Westside Recycled Water Project*, Notice of EIR Preparation, September 2008. This document is part of Case File No. 2008.0091E, available for review online at <http://www.sfplanning.org/index.aspx?page=1829>.

the San Francisco Recycled Water Program include the Eastside Recycled Water Project; Harding Park Recycled Water Project; and the Sharp Park Recycled Water Project.

The San Francisco Green Landscaping Ordinance (No. 84-10) was adopted on April 22, 2010 and applies to new development projects and projects involving significant alternation. The ordinance requires landscaping of publicly visible areas and rights-of-way including front yards, parking lot perimeters, and pedestrian walkways, as well as screening of parking and vehicular use areas. The ordinance also requires compliance with San Francisco Administrative Code Chapter 63, which applies to property owners requesting a new irrigation water service meter with a landscape area of 1,000 square feet or larger. The goals of the Green Landscaping Ordinance include the following: healthier and more plentiful plantings through screening, parking lot, and street tree controls; increased permeability through front yard and parking lot controls; encourage responsible water use through increasing "climate appropriate" plantings; and improved screening by creating an ornamental fencing requirement and requiring screening for newly defined "vehicle use areas."¹⁰³

San Francisco's Water Efficient Irrigation Ordinance (Chapter 63 of the Administrative Code) requires that landscape projects be installed, constructed, operated, and maintained in accordance with rules adopted by the SFPUC that establish a water budget for outdoor water consumption. A Maximum Applied Water Allowance, or water budget, is calculated for each landscape project and provides the project applicant with the appropriate amount of water that may be used to irrigate their landscape area. The requirements apply to public agencies and owners of residential, commercial, and mixed use properties with new construction landscape projects or rehabilitated landscape projects. If there are no plans to modify or improve the property's existing landscape or if the improvement areas are less than 1,000 square feet over a one year period, landscape documentation does not need to be submitted to the SFPUC; however, water efficient landscaping practices are encouraged. All landscapes are still subject to water waste prevention provisions. Different compliance mechanisms are applied based on the square footage of the new or rehabilitated landscape area.

The City also has adopted recycled water ordinances (Nos. 390-91, 391-91, 393-94) which require property owners, including municipal property owners, to install recycled water systems for recycled water use within designated recycled water use areas under the following circumstances: new or remodeled buildings and all subdivisions with a total cumulative area of 40,000 square feet or more or new and existing irrigated areas of 10,000 square feet or more. Non-potable recycled water is also required for soil and compaction and dust control activities during project construction (Ordinance 175-91). The SFPUC operates a recycled water truck-fill station at the Southeast Water Pollution Control Plant that provides recycled water for these activities at no charge.

In sum, according to the UWMP, projected growth in residential and commercial sectors, and indirectly recreation and other uses, would be accommodated by current and future water

¹⁰³ *Complying with San Francisco's Water Efficient Irrigation Requirements*, SF PUC, January 2011. This document is available for review on line at <http://sfwater.org/Modules/ShowDocument.aspx?documentID=731>.

supplies through 2030. The policies and objectives in the draft ROSE Update would not require expansion or construction of new water treatment facilities to meet anticipated needs. Further, the objectives and policies would not conflict with existing ordinances that have been adopted to address water conservation. Therefore, effects on water supply and wastewater treatment facilities would be less than significant.

Impact UT-3: Implementation of the draft ROSE Update would not to substantially affect landfill capacity or conflict with the City's current disposal agreement. (Less than Significant)

Solid waste generated in San Francisco is transported to and disposed of at the Altamont Landfill. The Altamont Landfill has an annual solid waste capacity of 2,226,500 tons for the City. However, the City is below its allowed capacity, generating approximately 550,000 tons of solid waste in 2005.¹⁰⁴

The San Francisco Board of Supervisors and Commission on the Environment set the City's landfill diversion goals at 75 percent by 2010 and zero waste by 2020 (Resolutions 679-02 and 002-03-COE). In order for the City to reach its 75 percent diversion goal, it must divert over 100,000 additional tons per year from the residential, commercial and City government sectors. Recycling, composting and waste reduction efforts are expected to increasingly divert waste from the landfill. Solid waste associated with future park and recreational facility construction and operations is an assumed part of the overall projected annual waste stream that San Francisco manages. The draft ROSE Update's objectives and policies would not substantially affect the projected life of the Altamont Landfill or the City's current disposal agreement, and this impact would be less than significant.

Impact UT-4: The construction and operation of future recreation and parks projects would follow all applicable statutes and regulations related to solid waste. (No Impact)

The draft ROSE Update's policies and objectives would not conflict with pertinent federal, state and local statutes and regulations regarding the disposal of solid waste generated by construction activities; therefore, no adverse impacts would occur.

Impact C-UT: In combination with past, present, and reasonably foreseeable future projects, implementation of the draft ROSE Update would not have a substantial cumulative impact on utilities and service systems. (Less than Significant)

As of February 2014, there are no known past, present, or reasonably foreseeable projects in or near parks and open spaces under the jurisdiction of the RPD that would interact with the proposed project to result in cumulative significant impacts with respect to utilities or service systems. Reasonably foreseeable future projects in or near parks and open spaces under the jurisdiction of the RPD include projects related to the 2008 Clean and Safe Parks Bond,¹⁰⁵ the 2012

¹⁰⁴ Cesar Chavez Street Sewer System Improvement Project, Mitigated Negative Declaration, Case No. 2009.0276E, December 2, 2009. This report is available for review at the Planning Department.

¹⁰⁵ SFRPD. 2008 Clean and Safe Parks Bond. Available online at <http://sfrecpark.org/park-improvements/2008-clean-safe-bond/>. Accessed February 19, 2014.

Parks Bond,¹⁰⁶ the SNRAMP, and several athletic field renovations. These projects primarily involve renovation of existing parks and open spaces.

As a policy document, the ROSE would not directly result in physical impacts, and would not be expected to result in indirect impacts that would demonstrably contribute considerably to cumulative impacts from projects affecting or in the vicinity of open space and recreation resources. Implementation of the draft ROSE Update would result in less-than significant impacts on utilities and service systems and would not be expected to have a considerable effect on utility service provision or facilities under cumulative conditions. For the reasons discussed above, the proposed project's impacts related to utilities and service systems, both individually and cumulatively, would be less than significant.

<u>Topics:</u>	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>	<u>Not Applicable</u>
12. PUBLIC SERVICES – Would the project					
a) Result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any public services such as fire protection, police protection, schools, parks, or other services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact PS-1: The draft ROSE Update would not increase demand for police protection and fire protection or require new or physically altered governmental facilities, the construction of which could cause significant environmental impacts. (No Impact)

The San Francisco Police Department provides police services to residents, visitors and workers in the City from the following ten stations: Central, Southern, Bayview, Mission, North, Park, Richmond, Ingleside, Taraval, and the Tenderloin. The draft ROSE Update would not require new or physically altered governmental facilities such as police stations.

Policy 1.5 in the General Plan's Community Facilities Element states, "As they require replacement, relocate existing nonconforming facilities consistent with community desires for neighborhood police facilities." The General Plan further elaborates:¹⁰⁷

Stable and horse care requirements for mounted patrols, prior to the widespread use of vehicles, suggested that police stations be located in parks. Ingleside and Park Stations, which were built in 1910, are located in Balboa Park and Golden Gate Park for this

¹⁰⁶ SFRPD. 2012 Parks Bond. Available online at: <http://sfrecpark.org/park-improvements/2012-bond/>. Accessed February 19, 2014.

¹⁰⁷ General Plan Community Safety Element, Policy 1.5. Accessed electronically on July 25, 2011 via: http://www.sfplanning.org/ftp/General_Plan/17_Community_Facilities.htm.

reason. Likewise, the noise aspect of pistol practice suggested the remote location of this activity at Lake Merced. Replacement of horses by vehicles and developments in gunfire muffing techniques bring into question the logic of maintaining Ingleside and Park Stations and the Pistol Range in their current remote open space settings.

In light of the high community value attached to parks in San Francisco, the preservation and restoration of park areas to park use is a long-range objective. Under the Recreation and Open Space Element of the General Plan, police facilities in designated recreation and open space areas are nonconforming uses. As these facilities become obsolete and require replacement, they should be relocated, consistent with the location and neighborhood service policies of this plan, and consistent with community desires for continued location of a district station in the neighborhood.

The draft ROSE Update does not call for elimination of any of the above police stations.

With respect to fire protection, the San Francisco Fire Department (SFFD) provides emergency services to the City. The SFFD consists of 42 engine companies, 19 truck companies, 20 ambulances, 2 rescue squads, 2 fire boats and 19 special purpose units. The engine companies are organized into 9 battalions. There are 41 permanently-staffed fire stations, and although the SFFD system has evolved over the years to respond to changing needs, the current station configuration has not changed substantially since the 1970s.¹⁰⁸

Implementation of the draft ROSE Update would not conflict with Policy 1.5 of the General Plan's Community Facilities Element pertaining to police facilities, nor would it conflict with the General Plan's "Principles for Fire Facilities," related to the siting of future fire stations. As such, the ROSE Update would have no impact on police or fire services.

Impact PS-2: The draft ROSE Update would and would not require the construction of new or physically altered school facilities. (No Impact)

The San Francisco Unified School District (SFUSD) provides public educational services within the City. In the last decade, overall SFUSD enrollment has gradually declined. The decline stopped in the fall of 2008, when kindergarten enrollments began to increase, reflecting a growth in birth rates five years earlier. SFUSD projections indicate that elementary enrollment will continue to grow.¹⁰⁹ The number of elementary school students will eventually rise from 25,000 students in 2008 to 27,600 in 2013, representing an 11 percent increase in five years. After a slight decline in 2009 and 2010, middle school enrollment will increase again. However, in 2013 it will still stand below current enrollment (at 11,640 compared with 11,816 in 2008). High school enrollment will experience a continuous decline over the next five years, from 19,696 students in 2008 to 18,396 in 2013. District-wide enrollment as of Fall 2008 was 55,272. The District currently

¹⁰⁸ *A Review of San Francisco's Fire and EMS Services*, City and County of San Francisco, Office of the Controller, April 28, 2004. This document is available for review at the Planning Department in Case File No. 2010.0641E.

¹⁰⁹ San Francisco Unified School District, *Capital Plan FY 2010-2019*, September 2009. Available at <http://portal.sfusd.edu/data/facilities/FINAL%20APPROVED%20CAPITAL%20PLAN%2020102019%20Oct%2027%202009.pdf>, accessed February 11, 2010.

maintains a property and building portfolio that has a student capacity for over 90,000 students.¹¹⁰ Thus, even with increasing enrollment, facilities throughout the City are underutilized.

Implementation of the draft ROSE Update would not change the demand for schools, and no new school facilities would be needed to accommodate the objectives of the ROSE Update. The draft ROSE Update contains Policy 1.8 which calls for "Support[ing] urban agriculture and local food security through development of policies and programs that encourage food production throughout San Francisco" and Policy 2.9, which states "Address physical and bureaucratic barriers to opening schoolyards as community open space during non-school hours." These policies are related to existing ROSE Policy 2.12 ("Expand community garden opportunities in the City") and Policy 4.2 ("Maximize joint use of other properties and facilities") and differ in that they have been refined to specifically call out school grounds in the policy objectives. Because the draft ROSE Update would not require the construction of new or physically altered schools, its implementation would have no adverse impact on public services.

Impact PS-3: The draft ROSE Update would not increase demand for government services. (No Impact)

Implementation of the draft ROSE Update would not substantially increase demand for government services and would not trigger the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts.

Impact C-PS: Implementation of the draft ROSE Update, combined with past, present, and reasonably foreseeable future projects, would not have a substantial cumulative impact to public services. (Less than Significant)

As of February 2014, there are no known past, present, or reasonably foreseeable projects in or near parks and open spaces under the jurisdiction of the RPD that would interact with the proposed project to result in cumulative significant impacts with respect to public services. Reasonably foreseeable future projects in or near parks and open spaces under the jurisdiction of the RPD include projects related to the 2008 Clean and Safe Parks Bond,¹¹¹ the 2012 Parks Bond,¹¹² the SNRAMP, and several athletic field renovations. These projects primarily involve renovation of existing parks and open spaces.

As a policy document, the ROSE would not directly result in physical impacts, and would not be expected to result in indirect impacts that would demonstrably contribute considerably to cumulative impacts from projects affecting or in the vicinity of open space and recreation resources. Implementation of the draft ROSE Update is not expected to increase demand for public services beyond levels anticipated and planned for by public service providers, and would

¹¹⁰ S.F.U.S.D. School Profiles 2008-2009, <http://orb.sfusd.edu/profile/prfl-100.htm>, accessed February 11, 2010.

¹¹¹ SFRPD. 2008 Clean and Safe Parks Bond. Available online at: <http://sfrecpark.org/park-improvements/2008-clean-safe-bond/>. Accessed February 19, 2014.

¹¹² SFRPD. 2012 Parks Bond. Available online at: <http://sfrecpark.org/park-improvements/2012-bond/>. Accessed February 19, 2014.

not be cumulatively considerable. For the reasons discussed above, the proposed project's impacts related to public services, both individually and cumulatively, would be less than significant.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
13. BIOLOGICAL RESOURCES – Would the project:					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact BIO-1: The draft ROSE Update would not have a substantial adverse effect, either directly or through habitat modifications, on any special-status species, sensitive natural community, protected wetlands, or conflict with an adopted conservation plan. (Less than Significant)

For the purposes of this Initial Study, the term "special-status species" includes species that are: 1) legally protected by the Federal Endangered Species Act (FESA), California ESA, or Migratory Bird Treaty Act (MBTA); or 2) locally significant sensitive species, including species on the

National Audubon Society's Watch List or those under threat of local extirpation, as determined by the Yerba Buena chapter of the California Native Plant Society (CNPS) or the Golden Gate chapter of the National Audubon Society.

The policies in the draft ROSE Update would not directly result in the construction of new parks or recreational facilities, but would serve to guide how and where the development and maintenance of these uses should occur in the future. Therefore, the ROSE Update would not directly have a substantial adverse effect on any special-status species or sensitive natural community. Subsequent projects that may be proposed under the context of the ROSE Update would be subject to project specific environmental review to determine whether they would result in any biological impacts.

Existing ROSE Policy 2.13 mandates that the City "preserve and protect natural resources." Policy 4.1 in the draft ROSE Update calls for "Protect[ing], preserv[ing] and restor[ing] local biodiversity." The draft ROSE Update would not conflict with existing or foreseeable plans or programs that pertain to the protection of special status species or other natural resources. Therefore, implementation of the draft ROSE Update would not have a substantial adverse effect, either directly or through habitat modifications, on any special-status species, sensitive natural community, protected wetlands, or conflict with an adopted conservation plan.

In the late 1990s, the RPD developed a Natural Areas Program to protect and manage natural areas for the natural and human values that these areas provide. The Natural Areas Program mission is to preserve, restore and enhance the remnant Natural Areas and to promote environmental stewardship of these areas. In 1995, the San Francisco Recreation and Parks Commission approved the first SNRAMP. As described in Plans and Policies, p. 30, the SNRAMP is currently undergoing an update and contains detailed information on the biology, geology and trails within the designated areas. The SNRAMP also recommends actions and best management practices intended to guide natural resource protection, habitat restoration, trail and access improvements, other capital projects, and maintenance activities over the next 20 years. Maintenance and conservation activities are categorized based on management priorities and represent differing levels of sensitivity, species presence, and habitat complexity. The SNRAMP is currently under environmental review and is scheduled for adoption in 2014.

In light of the above, implementation of the draft ROSE Update would not result in significant impacts on any special-status species, sensitive natural community, or protected wetlands, and would not conflict with an adopted conservation plan.

Impact BIO-2: Implementation of the draft ROSE Update would not have a substantial adverse effect on any riparian habitat or federally protected wetlands through direct removal, filling, hydrological interruption, or other means. (No Impact)

Wetlands and riparian areas provide habitat, biological benefits, and resource efficient methods for treating storm water runoff that often serve recreational users. Many of the City's wetlands have been buried by development and little of the original wetlands have survived. A number of

restoration projects have recently been completed or are underway, including Crissy field, Heron's Head, Pier 94 and the fresh and seasonal wetland at Lake Merced.

The state's authority in regulating activities in wetlands and waters resides primarily with the SWRCB. The SWRCB, acting through the SFBRWQCB, must certify that an U.S. Army Corps of Engineers (USACE) permit action meets state water quality objectives (CWA Section 401). Any condition of water quality certification is then incorporated into the Corps Section 404 permit authorized for a specific project. The SWRCB and SFBRWQCB also have jurisdiction over waters of the state under the Porter-Cologne Water Quality Control Act (Porter-Cologne). The SWRCB and SFBRWQCB evaluate proposed actions for consistency with the RWQCB's Basin Plan, and authorize impacts on waters of the state by issuing Waste Discharge Requirements (WDR) or in some cases, a waiver of WDR.

The San Francisco Bay Conservation and Development Commission (BCDC) has jurisdiction over coastal activities occurring within the San Francisco Bay Area. BCDC was created by the McAteer-Petris Act (California Government Code Sections 66600-66682). BCDC regulates fill, extraction of materials, and substantial change in use of land, water, and structures in San Francisco Bay and development within 100 feet of the Bay. BCDC has jurisdiction over all areas of the Bay that are subject to tidal action, including subtidal areas, intertidal areas, and tidal marsh areas that are between mean high tide and 5 feet above mean sea level. BCDC's permit jurisdiction does not extend to federally owned areas, such GGNRA lands, because they are excluded from state coastal zones pursuant to the Coastal Zone Management Act of 1972 (CZMA). However, the CZMA requires that all applicants for federal permits and federal agency sponsors obtain certification from the state's approved coastal program that a proposed project is consistent with the state's program. In San Francisco Bay, BCDC is charged with making this consistency determination.

As discussed above, the draft ROSE Update includes Policy 4.1, which states: "Protect, preserve and restore local biodiversity." The draft ROSE Update, p. 42, states: "The City should employ appropriate management practices to protect a well-balanced ecosystem which protects native species and preserves existing wildlife habitat... .. The long-term vision for the City should also include conserving and restoring hydrological resources, including riparian communities, seeps, springs, creeks, ponds, and lakes and exploring the feasibility of day lighting creeks that are completely or partially buried, ..."

Implementation of the draft ROSE Update would not have a substantial adverse effect on any riparian habitat or federally protected wetlands through direct removal, filling, hydrological interruption, or other means. In general, the draft ROSE Update policies call for identifying, mapping, preserving and in some instances day-lighting buried creeks where appropriate. Future projects that may affect wetland or riparian areas would require specific study and would be subject to review by agencies including, but not limited to, the USACE, SWRCB, SFBRWQCB and BCDC as appropriate.

Impact BIO-3: The draft ROSE Update would not interfere with the movement of native resident or wildlife species or with established native resident or migratory wildlife corridors. (Less than Significant)

Measures to Protect Migratory Birds

The MBTA of 1918 states that no person may "pursue, hunt, take, capture, kill, attempt to take, capture or kill, possess, offer for sale, sell, offer to purchase, purchase, deliver for shipment, ship, cause to be shipped, deliver for transportation, transport, cause to be transported, carry, or cause to be carried by any means whatever, receive for shipment, transportation or carriage, or export, at any time, or in any manner, any migratory bird, included in the terms of this Convention... for the protection of migratory birds... or any part, nest, or egg of any such bird (16 U.S.C. 703)."

In compliance with the MBTA, the RPD routinely implements measures to protect migratory birds and bird nests as part of construction projects. These measures require that: 1) a general preconstruction survey of the area be conducted by a qualified wildlife biologist; and 2) the construction schedule be developed or modified to work around predicted nesting activity to minimize the risk of conflict with the bird nesting season. When preconstruction surveys indicate "active" nests of protected birds are found in a tree slated for pruning or removal, the measures require that work on the tree be put on hold until the conclusion of the nesting season on August 15; and 2) a no-disturbance buffer be established around active nests during the breeding season, or until it is determined that all young have fledged.

Standards for Bird-Safe Buildings

There are approximately 400 resident and migratory species of birds in San Francisco, due to the diverse habitats of the Bay Area and its position on a coastal migration path known as the Pacific Flyway. In July 11, the San Francisco Board of Supervisors adopted the Standards for Bird-Safe Buildings ("Standards"). The Standards provide guidelines for evaluating the hazards posed to birds by window glazing and proximity to landscaping. These standards would apply, for example, to future clubhouses or other structures in parks or in areas where two "hazard triggers" are met: 1) location-related hazards where the siting of a structure creates increased risk to birds, and 2) feature-related hazards which may create increased risk to birds regardless of where the structure is located. Location-related hazards are created by structures that are near or adjacent to large open spaces and/or water.

The Standards identify designs that may pose hazards, and identify treatments that would provide safe buildings for birds. Buildings that pose the greatest hazard to birds are called bird-hazards and include those that:

- have a glass courtyard;
- have a transparent building corner;
- have a glazed passageway and/or sight lines through the building;
- clear glazed railings or bus shelters;
- clear-glass walls, greenhouse, or other clear barriers on rooftops or balconies; or

- are located within or immediately adjacent to open spaces of more than one acre with lush landscaping, or immediately adjacent to open water, and with a façade of more than 35 percent glazing.

The features listed above are prohibited unless the building incorporates treatments to address a bird hazard. The following treatments are required for all bird-hazards:

- Glazing treatments: fritting, permanent stencils, frosted glass, exterior screens, physical grids placed on the exterior of glazing or UV patterns visible to birds. These treatments are required so that the amount of untreated glazing is reduced to less than 35 percent of the façade facing the landscaping or water for 100 percent of a bird trap (any of the first five characteristics listed above). Vertical elements of the pattern shall be at least ¼-inch wide with a maximum spacing of 4 inches, and horizontal elements shall be at least 1/8-inch wide with a maximum spacing of 2 inches. Equivalent treatments recommended by a qualified biologist may be used if approved by the Zoning Administrator. No glazing shall have a "Reflectivity Out" coefficient greater than 30 percent.
- Minimal lighting (limited to pedestrian safety needs) shall be used. Lighting shall be shielded.
- No uplighting should be used.
- The site must not use horizontal axis windmills or vertical axis wind generators that do not appear solid.

The draft ROSE Update is a policy document that does not include construction activities. Future project proposals that may result from the draft ROSE Update could require project-specific environmental review if the proposal has the potential to result in physical changes to the environment. With compliance with the MBTA and adherence to the City's Bird-Safe Building Standards, implementation of the draft ROSE Update would not adversely affect the movement of wildlife species.

Impact BIO-4: The draft ROSE Update would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. (Less than Significant)

The San Francisco Planning Department, DBI, and DPW have established guidelines to ensure that legislation adopted by the Board of Supervisors governing the protection of trees is implemented. The DPW Code Section 8.02-8.11 requires disclosure and protection of Landmark, Significant, and Street trees, collectively "protected trees"¹¹³ located on private and public

¹¹³ A "Street Tree" is any tree growing within the public right-of-way (e.g., sidewalk) that is not also a Landmark Tree. A "Landmark Tree" is a tree designated as such by the Board of Supervisors owing to particular age, size, shape, species, location, historical association, visual quality, or other contribution to the City's character. A "Significant Tree" is a tree that is planted on the subject property (i.e., outside of the public right-of-way) with any portion of its trunk within 10 feet of the public right-of-way that has: a) a diameter at breast height (DBH) in excess of 12 inches; or b) a height in excess of 20 feet; or c) a canopy in excess of 15 feet. Removal of Significant Trees on privately owned property is subject to the requirements for removal of Street Trees. As part of the determination to authorize removal of a Significant Tree, the Director of DPW is required to consider certain factors related to the tree, including (among

property. A Landmark Tree has the highest level of protection and must meet certain criteria for age, size, shape, species, location, historical association, visual quality, or other contribution to the City's character and have been found worthy of Landmark status after public hearings at both the Urban Forestry Council and the Board of Supervisors. A Significant tree is either on property under the jurisdiction of the DPW, or on privately owned land within 10 feet of the public-right-of-way which satisfies certain criteria. Street trees are trees within the public right-of-way or within the DPW jurisdiction. A Planning Department "Tree Disclosure Statement" must accompany all permit applications that could potentially impact a protected tree.

For trees on RPD property, tree removal is subject to established RPD procedures:¹¹⁴

- Emergencies: All trees posing an imminent hazard or posing a potential for disease transmission shall be mitigated, including potential removal without public notification.
- Golden Gate Park: Trees removed for the reforestation program shall not be posted for public review. During the course of work, each reforestation plot shall have an informal posting explaining the program and contact for further information. Golden Gate Park's reforestation plan has been documented for the last seventeen years [e.g., since 1980] and is included in the Park's Master Plan. Specimen, historical or significant trees removed for other than hazards shall be posted with high-visibility notices for 30 days. The notices shall include the reason for the removal, a comment period, proposed date of removal, and contact information. Tree removal shall recognize wildlife habitat, such as nesting birds.
- Neighborhood Parks and Squares: All tree removals in neighborhood parks and squares, for other than hazard abatement, shall be posted with high visibility notice for 30 days. The notices shall include the reason for the removal, a comment period, proposed date of removal, and contact information. Neighborhood association notification will also be conducted when applicable and to the extent feasible. The [Recreation and Park] Department will attempt to involve the community whenever a tree must be removed as to replacement specifics and location. Park construction projects shall include information on pending tree removals during community and meetings and mailings.

Existing ROSE Policy 2.9 states, "Maintain, and expand the urban forest." Draft Policy 3.6 states, "Maintain, restore, expand and fund the urban forest." Implementation of the draft ROSE Update would not conflict with existing tree preservation policies or ordinances, and this impact is considered less than significant.

Impact C-BIO: Implementation of the draft ROSE Update, combined with past, present, and reasonably foreseeable future projects, would not result in substantial cumulative adverse impacts to biological resources. (Less than Significant)

others) its size, age, species, and visual, cultural, and ecological characteristics (Sections 810A(b) and 810A(c) of San Francisco Public Works Code).

¹¹⁴ Recreation and Parks Department, Tree Removal Procedures, Adopted July 31, 1997. This document is available for review at the Planning Department as part of Case File No. 2010.0641E.

As of February 2014, there are no known past, present, or reasonably foreseeable projects in or near parks and open spaces under the jurisdiction of the RPD that would interact with the proposed project to result in cumulative significant impacts with respect to biological resources. Reasonably foreseeable future projects in or near parks and open spaces under the jurisdiction of the RPD include projects related to the 2008 Clean and Safe Parks Bond,¹¹⁵ the 2012 Parks Bond,¹¹⁶ the SNRAMP, and several athletic field renovations. These projects primarily involve renovation of existing parks and open spaces.

As a policy document, the ROSE would not directly result in physical impacts, and would not be expected to result in indirect impacts that would demonstrably contribute considerably to cumulative impacts from projects affecting or in the vicinity of open space and recreation resources. Implementation of the draft ROSE Update would result in less-than-significant biological impacts, and would not contribute to cumulative biological impacts. For the reasons discussed above, the proposed project's impacts related to biological resources, both individually and cumulatively, would be less than significant.

<u>Topics:</u>	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>	<u>Not Applicable</u>
14. GEOLOGY AND SOILS—					
Would the project:					
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:					
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

¹¹⁵ SFRPD. 2008 Clean and Safe Parks Bond. Available online at: <http://sfrecpark.org/park-improvements/2008-clean-safe-bond/>. Accessed February 19, 2014.

¹¹⁶ SFRPD. 2012 Parks Bond. Available online at: <http://sfrecpark.org/park-improvements/2012-bond/>. Accessed February 19, 2014.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
c) Be located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 1.8-1-B of the Uniform Building Code, creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Change substantially the topography or any unique geologic or physical features of the site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact GE-1: The draft ROSE Update would not result in exposure of people and structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, expansive soils, seismic ground-shaking, liquefaction, lateral spreading, or landslides. (Less than Significant)

The General Plan's Community Safety Element contains maps that show areas of the City subject to seismic geologic hazards. The draft ROSE Update's policies and objectives would apply to parks, recreational facilities and open spaces, including spaces or facilities that are within areas subject to ground shaking from earthquakes along the San Andreas, Northern Hayward and other Bay Area faults. Because these parks, recreational facilities, and open spaces are located in a seismically active region, the potential exists for seismic-related ground failure. Some areas in the City may also be subject to seismic-related liquefaction or landslides.¹¹⁷ These areas generally include the Western Shoreline, Presidio, Northeastern Waterfront, Downtown, Mission Bay, SOMA, the Mission, Central Waterfront, Bayview-Hunters Point. This is due to the presence of artificial fill and the fact that the San Francisco Bay Area and surrounding areas are characterized by numerous geologically young faults. There are, however, no known fault zones or designated Alquist-Priolo Earthquake Fault Zones¹¹⁸ in or near the parks or open spaces to which the draft ROSE Update applies. Therefore, the draft ROSE Update would have no impact with respect to rupture of a known earthquake fault.

¹¹⁷ State of California Divisions of Mines and Geology, Map 4 – Seismic Hazard Study Zones – Area of Liquefaction Potential for San Francisco; San Francisco General Plan, Community Safety Element.

¹¹⁸ The Alquist-Priolo Earthquake Fault Zoning (AP) Act was passed into law following the destructive magnitude 6.6 San Fernando earthquake in 1971. The AP Act provides a mechanism for reducing losses from surface fault rupture on a statewide basis. The intent of the AP Act is to ensure public safety by prohibiting the siting of most structures for human occupancy across traces of active faults that constitute a potential hazard to structures from surface faulting or fault creep. Source: California Department of Conservation/Geological Survey website, <http://www.consrv.ca.gov/ogsl/rghm/ap/Pages/Index.aspx>, accessed July 26, 2011.

Although the potential for seismic ground shaking and ground failure to occur within San Francisco is unavoidable, no structures or specific projects are proposed under the draft ROSE Update that would be constructed and could expose people to new seismic-related hazards. Draft ROSE Update Policies 1.1, 1.2, 1.3, 1.4, 2.1, 2.3, 2.4, 2.5, 2.9, 2.10, 3.1, and 3.2 could result in increased activities in some mapped hazard areas. While increased activities and new structures (e.g., potential clubhouses, recreation centers and the like) associated with implementing draft ROSE policies may occur in parks and open spaces, potential impacts would be offset with compliance with the San Francisco Building Code, Earthquake Hazards Reduction Act, Alquist-Priolo Earthquake Fault Zoning Act, and Seismic Hazards Mapping Act of 1990. The State of California provides minimum standards for building design through the California Building Code (CBC). The CBC regulates excavation, foundation and retaining walls. The CBC applies to building design and construction in the state and is based on the federal Uniform Building Code (UBC), used widely throughout the country. The CBC has been modified for California conditions with numerous, more detailed and/or more stringent regulations. The Code identifies seismic factors that must be considered in structural design.

Additionally, the Building Code includes regulations that would further reduce potential impacts, such as requiring compliance with the City's Code that contains specific provisions related to seismic hazards and upgrades. Compliance with the Building Code is mandatory for development in San Francisco. Throughout the permitting, design, and construction phases of a building project, Planning Department staff, DBI engineers, and DBI building inspectors confirm that the Building Code is being implemented by project architects, engineers, and contractors. During the design phase for future residential development, foundation support and structural specifications based on the preliminary foundation investigations would be prepared by the engineer and architect and would be reviewed for compliance with the Building Code by the Planning Department and DBI. Although some draft ROSE Update policies could potentially increase the effect of this hazard by increasing the intensity of parks and recreational facilities, DBI in its permit review process would ensure that buildings meet specifications for the protection of life and safety and all new development would be required to comply with the previously discussed federal, state, and local regulations. Therefore, the draft ROSE Update would have a less than significant impact with respect to the exposure of people to strong seismic ground shaking and seismic-related ground failure, including liquefaction, or landslides.

Impact GE-2: The draft ROSE Update would not result in substantial loss of topsoil, erosion or adverse impacts to topographical features. (Less than Significant)

Construction activities could result in impacts related to soil erosion and the loss of top soil, if future parks or improvements to recreational facilities and open spaces in the context of the draft ROSE Update would require substantial amounts of grading. This could result in erosion as well as potentially change the topography or any unique geologic or physical features.

Potential impacts would be offset by compliance with the California Building Standards Code and the San Francisco Building Code that include regulations that have been adopted to reduce impacts from grading and erosion. Compliance with the Building Code is mandatory for development in San Francisco. During the design phase for buildings, grading plans must be

prepared by the engineer and architect that would be reviewed by the Planning Department and Department of Building Inspection for compliance with the Building Code. Regulations that would further reduce erosion effects include compliance with (NPDES permits related to construction activities as administered by the San Francisco Bay Regional Water Quality Control Board. Under these regulations, a project sponsor must obtain a general permit through the NPDES Stormwater Program for all construction activities with ground disturbance of one acre or more. The general permit requires the implementation of best management practices to control erosion, including the development of an erosion and sediment control plan for wind and rain. Therefore, the draft ROSE Update would have a less-than-significant impact with respect to soil erosion or the loss of topsoil.

Impact GE-3: The draft ROSE Update would not locate recreational uses on geologic units or soils that are expansive, unstable, or that would become unstable as a result of future uses, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. (Less than Significant)

Construction of park, recreation and open space projects could occur in the context of the ROSE in the future and may result in impacts related to expansive soil if new recreational uses would be constructed on or near unstable areas. As discussed under Impact GE-1, the draft ROSE Update policies promote increasing intensity of use and making better use of existing facilities. Potential geotechnical and soils impacts would be offset by compliance with the previously discussed regulations, including those in the San Francisco Building Code. DBI, in its permit review process, would ensure that buildings meet specifications for the protection of life and safety. Therefore, the implementation of the draft ROSE Update would have a less-than-significant impact with respect to expansive soils, creating substantial risks to life or property.

Impact GE-4: The draft ROSE Update would not use septic tanks or alternative wastewater disposal systems, which would have soils incapable of adequately supporting them. (Not Applicable)

While the draft ROSE Update would not directly result in the construction of recreational facilities, potential future projects proposed in the context of the ROSE could be connected to the City's existing wastewater treatment and disposal system. No septic tanks or alternate wastewater disposal system are proposed. Therefore, the draft ROSE Update would have no impact with respect to septic tanks or alternative wastewater disposal systems.

Impact C-GE: Implementation of the draft ROSE Update, in combination with past, present, and reasonably foreseeable future projects, would not have a substantial cumulative impact on geology and soils. (Less than Significant)

As of February 2014, there are no known past, present, or reasonably foreseeable projects in or near parks and open spaces under the jurisdiction of the RPD that would interact with the proposed project to result in cumulative significant impacts with respect to geology or soils. Reasonably foreseeable future projects in or near parks and open spaces under the jurisdiction of

the RPD include projects related to the 2008 Clean and Safe Parks Bond,¹¹⁹ the 2012 Parks Bond,¹²⁰ the SNRAMP, and several athletic field renovations. These projects primarily involve renovation of existing parks and open spaces.

As a policy document, the ROSE would not directly result in physical impacts, and would not be expected to result in indirect impacts that would demonstrably contribute considerably to cumulative impacts from projects affecting or in the vicinity of open space and recreation resources. Implementation of the draft ROSE Update would result in less-than-significant impact to topographical features, loss of topsoil or erosion, or risk or injury or death involving landslides, and would not have a considerable contribution to related cumulative impacts. For the reasons discussed above, the proposed project's impacts related to geology, soils, and seismicity, both individually and cumulatively, would be less than significant.

<u>Topics:</u>	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>	<u>Not Applicable</u>
15. HYDROLOGY AND WATER QUALITY— Would the project					
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion of siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

¹¹⁹ SFRPD. 2008 Clean and Safe Parks Bond. Available online at: <http://sfrecpark.org/park-improvements/2008-clean-safe-bond/>. Accessed February 19, 2014.

¹²⁰ SFRPD. 2012 Parks Bond. Available online at: <http://sfrecpark.org/park-improvements/2012-bond/>. Accessed February 19, 2014.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other authoritative flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact HY-1: The draft ROSE Update would not violate water quality standards or otherwise substantially degrade water quality. (Less than Significant)

Construction of future projects that may be proposed in the context of the ROSE would be required to comply with federal, state, and local regulations that pertain to water quality. Groundwater that is encountered during construction is subject to the requirements of the City's Industrial Waste Ordinance (Ordinance Number 199-77), requiring that groundwater meet specified water quality standards before it may be discharged into the sewer system. Treatment would be provided pursuant to the effluent discharge standards contained in the City's NPDES permit for its wastewater treatment plants.

San Francisco's combined sewer system is overseen by a comprehensive master plan adopted approximately 40 years ago. The sewer system has operated well but aging infrastructure, funding constraints, and deferred maintenance have created the need for another long-term master plan. In 2005, the SFPUC initiated a new master plan to develop a long-term strategy for management of the City's wastewater and stormwater, to provide a detailed roadmap for improvements needed over the next few decades and to estimate funds to implement these improvements, to address specific challenges facing the system, and to maximize system reliability and flexibility. The SFPUC is also preparing the Recycled Water Master Plan, which would guide implementation of recycled water projects that would reduce overall need for additional wastewater treatment. Additional regulations that would reduce potential impacts from polluted runoff include compliance with NPDES permits related to construction activities as administered by the SFBRWQCB and Article 4 of the Porter-Cologne Water Quality Act,

compliance with the Combined Sewer Overflow Control Policy and Total Maximum Daily Load standards as set forth by the Basin Plan.¹²¹

Lastly, regulations incorporated into the San Francisco Green Building Ordinance address stormwater management by seeking to reduce impervious cover, promote infiltration, and capture and treat 90 percent of the runoff from an average annual rainfall event using acceptable Best Management Practices. These regulations require that projects on undeveloped sites would need to avoid any increase in runoff, while previously developed sites would be required to reduce runoff from existing amounts.

The draft ROSE Update policies and objectives would not conflict with existing policies, regulations or programs that pertain to water quality. As such, implementation of the draft ROSE Update would not substantially degrade water quality or contaminate a public water supply.

Impact HY-2: The draft ROSE Update would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge. (Less than Significant)

The City overlies all or part of seven groundwater basins. These groundwater basins include the Westside, Lobos, Marina, Downtown, Islais Valley, South San Francisco, and Visitation Valley basins. The Lobos, Marina, Downtown and South basins are located wholly within the City limits, while the remaining three extend south into San Mateo County. With the exception of the Westside and Lobos basins, all of the basins are generally inadequate to supply a significant amount of groundwater for municipal supply due to low yield.¹²² Local groundwater use has occurred in small quantities in the City. For several decades groundwater has been pumped from wells located in Golden Gate Park and the San Francisco Zoo. Based on well operator estimates, about 1.5 mgd is produced by these wells. The groundwater is mostly used in the Westside Groundwater Basin by the RPD for irrigation in Golden Gate Park and at the Zoo. These wells are located in the North Westside Groundwater Basin. The California Department of Water Resources (DWR) has not identified this basin as over-drafted, nor as projected to be over-drafted in the future. Based on semi-annual monitoring, the groundwater currently used for irrigation and other non-potable uses in San Francisco meets, or exceeds, the water quality needs for these end uses.

Implementation of the draft ROSE Update would not directly result in the removal of water, either from the ground or other sources. However, construction of future projects that may be proposed as a result of the draft ROSE Update could result in impacts related to groundwater supplies if the development of future recreational facilities would require dewatering or result in groundwater drawdown or substantially reduce infiltration. Future proposals would be evaluated on a project-level basis considering location of development, depth of potential

¹²¹ The Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan) is the Regional Water Quality Control Board's master water quality control planning document. It designates beneficial uses and water quality objectives for waters of the State, including surface waters and groundwater. It also includes programs of implementation to achieve water quality objectives. The Basin Plan has been adopted and approved by the State Water Resources Control Board, U.S. EPA, and the Office of Administrative Law where required.

¹²² 2010 Urban Water Management Plan for the City and County of San Francisco, pg. 25, SFPUC, June, 2011.

groundwater, and type of construction being proposed. Proposals would be required to comply with existing regulations, including the SFPUC's Stormwater Design Guidelines. As such, the draft ROSE Update would result in less-than-significant effects related to groundwater.

Impact HY-3: The draft ROSE Update would not substantially alter the City's existing drainage patterns, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation. (Less than Significant)

The City contains many small creeks which historically ran from the east side of the City to the Bay, including Hayes Creek, Arroyo Delores, Mission Creek, Precita Creek, Islais Creek, and Yosemite Creek. The Presidio is home to Lobos Creek and Dragonfly Creek; Islais Creek runs through Glen Canyon and O'Shaughnessy Hollow. However, most of these creeks have been filled or run underground in culverts and are not free-flowing on the surface. There are no existing rivers in the City. Implementation of the draft ROSE Update would not result in any direct erosion effects or alter the course of a stream or river.

The potential for on-site erosion of exposed soil surfaces during construction activity is addressed in Impact GE-2. As described therein, future projects would comply with regulations related to runoff and grading, including the Stormwater Management Ordinance. As such, implementation of the draft ROSE Update would have less-than-significant effects related to erosion and siltation.

Impact HY-4: The draft ROSE Update would not expose people, housing, or structures to substantial risk of loss due to flooding. (Less than Significant)

Development in the City must account for flooding potential. Areas located on fill or bay mud can subside to a point at which the sewers do not drain freely during a storm (and sometimes during dry weather) and there can be backups or flooding near these streets and sewers. Portions of the City prone to flooding during storms, especially where a structure's ground-floors are located below an elevation of 0.0 City Datum or, more importantly, below the hydraulic grade line or water level of the sewer.

The City has implemented a review process to avoid flooding problems caused by the relative elevation of the structure to the hydraulic grade line in the sewers. Applicants for building permits for either new construction, change of use or change of occupancy, or for major alterations or enlargements are referred to the SFPUC for a determination of whether the project would result in ground-level flooding during storms. The side sewer connection permits for these projects need to be reviewed and approved by the SFPUC at the beginning of the review process for all permit applications submitted to the Planning Department, DBI, or the Successor Agency. The SFPUC and/or its delegate (SFDPW, Hydraulics Section) will review the permit application and comment on the proposed application and the potential for flooding during wet weather. The SFPUC will receive and return the application within a two-week period from date of receipt. The permit applicant shall refer to SFPUC requirements for information required for the review of projects in flood-prone areas. Requirements may include provision of a pump station for the sewage flow, raised elevation of entryways, and/or special sidewalk construction and the provision of deep gutters.

Flood risk assessment and some flood protection projects are conducted by federal agencies including the Federal Emergency Management Agency (FEMA) and the USACE. The flood management agencies and cities implement the NFIP under the jurisdiction of FEMA and its Flood Insurance Administration. Currently, the City does not participate in the NFIP and no flood maps are published for the City. However, FEMA is preparing Flood Insurance Rate Maps (FIRMs) for the City for the first time. FIRMs identify areas that are subject to inundation during a flood having a 1 percent chance of occurrence in a given year (also known as a "base flood" or "100-year flood"). FEMA refers to the flood plain that is at risk from a flood of this magnitude as a special flood hazard area ("SFHA").

Because FEMA has not previously published a FIRM for the City, there are no identified SFHAs within San Francisco's geographic boundaries. FEMA has completed the initial phases of a study of the San Francisco Bay. On September 21, 2007, FEMA issued a preliminary FIRM of San Francisco for review and comment by the City. The City has submitted comments on the preliminary FIRM to FEMA. FEMA anticipates publishing a revised preliminary FIRM in 2012¹²³, after completing the more detailed analysis that Port and City staff requested in 2007. After reviewing comments and appeals related to the revised preliminary FIRM, FEMA will finalize the FIRM and publish it for flood insurance and floodplain management purposes.

FEMA has tentatively identified SFHAs along the City's shoreline in and along the San Francisco Bay consisting of Zone A (in areas subject to inundation by tidal surge) and Zone V (areas of coastal flooding subject to wave hazards).¹²⁴ On June 10, 2008, legislation was introduced at the San Francisco Board of Supervisors to enact a floodplain management ordinance to govern new construction and substantial improvements in flood prone areas of San Francisco, and to authorize the City's participation in NFIP upon passage of the ordinance. Specifically, the proposed floodplain management ordinance includes a requirement that any new construction or substantial improvement of structures in a designated flood zone must meet the flood damage minimization requirements in the ordinance. The NFIP regulations allow a local jurisdiction to issue variances to its floodplain management ordinance under certain narrow circumstances, without jeopardizing the local jurisdiction's eligibility in the NFIP. However, the particular projects that are granted variances by the local jurisdiction may be deemed ineligible for federally-backed flood insurance by FEMA. Once the City has reviewed the revised preliminary FIRM, FEMA will publish a final FIRM that will be used for floodplain management and flood insurance purposes. In the meantime, the City uses the Interim Floodplain Map to support the implementation of the Floodplain Management Ordinance.

Implementation of the draft ROSE Update would have a less-than-significant impact with regard to exposing people or structures to significant flooding risk. Future projects that may result from the draft ROSE Update would be subject to appropriate controls related to flooding. Therefore, the draft ROSE Update policies would result in less-than-significant effects related to flooding hazards.

¹²³ San Francisco Floodplain Management Program Fact Sheet, Office of the City Administrator, Revised January 25, 2011. This document is available for review at the Planning Department in Case File 2010.0641E.

¹²⁴ City and County of San Francisco, Office of the City Administrator, National Flood Insurance Program Flood Sheet, http://www.sfgov.org/site/uploadedfiles/risk_management/factsheet.pdf, accessed July 31, 2008.

Impact HY-5: The draft ROSE Update would not expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow. (No Impact)

The draft ROSE Update includes Policy 2.10 that states, "Improve access to and level of activity provided at San Francisco reservoirs." Potential future projects that could be developed in the context of the ROSE could result in impacts related to flooding if parks and recreational facilities are placed near aboveground reservoirs and tanks. Dams and reservoirs which hold large volumes of water represent a potential hazard due to failure caused by ground shaking.

The SFPUC owns aboveground reservoirs and tanks within the City. It also monitors its facilities and submits periodic reports to DWR, Division of Safety of Dams, which regulates large dams. The City's largest reservoir is the Sunset Reservoir located in the Outer Sunset area. The reservoir includes a publicly accessible park around its perimeter and users in this area could potentially be subject to risk from flooding in the event of reservoir failure. The SFPUC has recently completed a seismic retrofit of the Sunset Reservoir. The north basin roof, columns and beams have been seismically reinforced and the earth embankment around the reservoir was stabilized to minimize risk from liquefaction.¹²⁵

Tsunamis (seismic sea waves) are long-period waves that are typically caused by underwater seismic disturbances, volcanic eruptions, or submerged landslides. Tsunamis, which travel at speeds up to 700 miles per hour, are typically only 1 to 3 feet high in open ocean water but may increase in height to up to 90 feet as they reach coastal areas, causing potentially large amounts of damage when they reach land.¹²⁶ Low-lying coastal areas such as tidal flats, marshlands, and former Bay margins that have been artificially filled but are still at or near sea level are generally the most susceptible to tsunami inundation. Existing parks and recreational facilities, including Ocean Beach, the Presidio, Crissy Field, Marina Green, Aquatic Park, Justin Herman Plaza, Treasure Island, Candle Stick Point Recreation Area, and Sharp Park are located within mapped tsunami inundation areas.¹²⁷ A seiche is an oscillation of a water body, such as a bay, which may cause local flooding. A seiche could occur on the San Francisco Bay due to seismic or atmospheric activity. Seiches can result in long-period waves that cause run-up or overtopping of adjacent landmasses, similar to tsunami run up. According to the historical record, seiches are rare.

Implementation of the draft ROSE Update would have a less-than-significant impact with regard to exposing people or structures to significant risk of loss, injury or death involving inundation by seiche, tsunami or mudflow. Objective 1 of the General Plan's Community Safety Element states: "Improve the coordination of City programs that mitigate physical hazards, help individuals and organizations prepare for and respond to disasters, and recover from the impacts

¹²⁵ Subsequent to the completion of the seismic upgrade the City and County engaged in a public-private partnership to install a 5 mega-watt solar array on the reservoir's roof. The solar array project was completed in December, 2010. Source: <http://sanfrancisco.cbslocal.com/2010/12/07/massive-solar-project-at-sunset-reservoir-completed>, accessed August 15, 2011.

¹²⁶ City and County of San Francisco Hazard Mitigation Plan, URS Corporation, <http://www.sfdem.org/>, accessed August 15, 2011.

¹²⁷ California Emergency Management Agency, California Geological Survey, Tsunami Inundation Maps for Emergency Planning, San Francisco West, North and East Quadrangles, California Department of Conservation, http://www.conservation.ca.gov/CGS/GEOLOGIC_HAZARDS/TSUNAMI/Pages/Index.aspx, accessed August 15, 2011.

of disasters.” The draft ROSE Update policies would not conflict with or preclude the implementation of existing policies in the General Plan’s Community Safety Element.

In the event that an earthquake occurred that would be capable of producing a tsunami that could affect San Francisco, the National Warning System would provide warning to the City. The San Francisco warning system (sirens and loudspeakers, tested each Tuesday at noon) would then be initiated, which would sound an alarm alerting the public to tune into local TV, cable TV, or radio stations, which would carry instructions for appropriate actions to be taken as part of the Emergency Alert System. Police would also canvas the neighborhoods sounding sirens and bullhorns, as well as knocking on doors if needed, to provide emergency instructions. Evacuation centers would be set up if required. The advance warning system would allow for evacuation of people, including those who may be in parks or using recreational facilities, prior to a seiche and would provide a high level of protection to public safety.

Therefore, impacts related to exposure of people to risk from inundation by seiche and tsunamis are considered less than significant.

Impact C-HY: Implementation of the draft ROSE Update, in combination with past, present, and reasonably foreseeable future projects, would not have a substantial cumulative impact on hydrology and water quality. (Less than Significant)

As of February 2014, there are no known past, present, or reasonably foreseeable projects in or near parks and open spaces under the jurisdiction of the RPD that would interact with the proposed project to result in cumulative significant impacts with respect to hydrology or water quality. Reasonably foreseeable future projects in or near parks and open spaces under the jurisdiction of the RPD include projects related to the 2008 Clean and Safe Parks Bond,¹²⁸ the 2012 Parks Bond,¹²⁹ the SNRAMP, and several athletic field renovations. These projects primarily involve renovation of existing parks and open spaces.

As a policy document, the ROSE would not directly result in physical impacts, and would not be expected to result in indirect impacts that would demonstrably contribute considerably to cumulative impacts from projects affecting or in the vicinity of open space and recreation resources. Implementation of the draft ROSE Update would have less-than-significant impacts on hydrology and water quality, and the project’s contribution to any cumulative impacts on hydrology or water quality would be less-than-significant.

¹²⁸ SFRPD. 2008 Clean and Safe Parks Bond. Available online at <http://sfrecpark.org/park-improvements/2008-clean-safe-bond/>. Accessed February 19, 2014.

¹²⁹ SFRPD. 2012 Parks Bond. Available online at <http://sfrecpark.org/park-improvements/2012-bond/>. Accessed February 19, 2014.

<u>Topics:</u>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
16. HAZARDS AND HAZARDOUS MATERIALS— Would the project:					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Because San Francisco International Airport is about 8 miles south of the City, topics 6e and 6f are not applicable.

Impact HZ-1: Implementation of the draft ROSE Update would not create a significant hazard through routine transport, use, disposal, handling, or emission of hazardous materials. (Less than Significant)

The draft ROSE Update would not directly create significant hazards, though implementation of future projects resulting from the draft ROSE Update may require the use of motor vehicles and

motorized equipment for the management of activities such as tree removal or pruning, erosion control and trail maintenance. Additionally, pesticides may be used as part of the Integrated Pest Management Plan.¹³⁰ Aside from pesticides, hazardous materials used during the implementation of potential future projects could include fuel, oil, solvents, and lubricants used for equipment maintenance.¹³¹ Any activities involving hazardous materials and hazardous waste would be conducted in accordance with health and safety standards mandated by the Occupational Safety and Health Administration (OSHA) and included in the Pest Management Plan, reducing potential hazards to workers, the public and the environment from the use, transport, and disposal of those materials and wastes.¹³²

Impact HZ-2: Implementation of the draft ROSE Update would not create a significant hazard through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. (Less than Significant)

In the past, asbestos, arsenic, polychlorinated biphenyls (PCBs), and lead were commonly used in play equipment, and in such materials as fireproofing, floor tiles, roofing tar, electrical transformers, elevators, fluorescent light ballasts, and paint. Therefore, older recreational buildings, clubhouses and other facilities may contain hazardous materials such as asbestos, PCBs and lead. The Planning Department, Department of Public Health (DPH), and other responsible agencies may require that a Phase I Environmental Site Assessment ("Phase I ESA") be prepared in conjunction with a future project that may result from the draft ROSE Update to determine the potential for hazardous materials to be present at, within, or beneath the surface of a building or a property. If the Phase I ESA determines a potential for hazardous materials or contamination to exist, further analysis ("Phase II Site Assessment") may be required. As part of a Phase II, soils or materials sampling may be required to test for the presence of hazardous materials. If such materials exist in a building when it is demolished or altered, or if soils are disturbed that may be contaminated, they could pose hazards to workers, neighbors, or the environment. The removal of hazardous building materials, including lead-based paint and asbestos, is regulated as described below by Chapter 34 of the San Francisco Building Code and Section 19827.5 of the California Health and Safety Code, respectively.

¹³⁰ The Integrated Pest Management Ordinance established the City's integrated pest management program for city properties in 1996. It requires an integrated approach to all pest control operations; establishes posting, record keeping and accountability requirements; and phased out the use of most hazardous pesticides. San Francisco Department of the Environment, accessed electronically on July 28, 2011 at: <http://www.sfenvironment.org>

¹³¹ Hazardous materials, as defined in Section 25501(h) of the California Health and Safety Code, are materials that, because of their quantity, concentration or physical or chemical characteristics, pose a substantial present or potential hazard to human health and safety if released to the workplace or to the environment.

¹³² Hazardous waste is defined as any material that is relinquished, recycled or inherently waste-like and falls under Title 22 of the California Code of Regulations, Division 4.5, Chapter 11 that contains regulations for the classification of hazardous wastes. A waste is considered hazardous if it is toxic (causes adverse human health effects), ignitable (has the ability to burn), corrosive (causes severe burns or damages materials), or reactive (causes explosions or generates toxic gases).

Arsenic

Arsenic is commonly used in wood treatment and preservatives as either Ammonium Copper Arsenate (ACA) or Chromated Copper Arsenate (CCA).¹³³ CCA is the more prevalent; it is a mixture of three pesticide compounds containing arsenic, chromium, and copper. These watersoluble chemicals are used as wood preservatives for vacuum pressure treatment of dimensional lumber. Arsenic and Hexavalent Chromium are considered potential human carcinogens. The natural background level of arsenic in the soil of the San Francisco Bay Area is approximately 20 parts per million (ppm). The California Department of Toxic Substances (DTSC) and the USEPA classify materials containing arsenic at levels above 500 parts per million as hazardous waste, mandating disposal through regulations.

Public agencies have long considered the presence of arsenic in treated wood, including those on some RPD playground structures, and have presented them as low and insignificant risk materials. For reasons of general safety, public awareness, and the overall trend of replacing the play structures with more modern, painted metal structures, in 2003 the RPD set up a systematic program—the Arsenic-Hazard Assessment (A-HA) Program—to serve as a general scheme for prioritizing the long term replacement and/or maintenance of these structures. The RPD program assigns priorities (P1 through P6) for cleanup, removal, sealing and/or monitoring of play structures and other materials based on the sampled material, its sampled arsenic content, whether the material can be dislodged, whether the material is sealable, and the probability of hand-to-mouth contact. P1 priorities are for materials at the greatest risk of exposure to users, and they require cleanup or removal of materials, blocked access to children, and warnings to playground staff. P6 priorities are for materials that pose no reasonable risk for exposure, and they require only periodic monitoring. The RPD considers these ratings in the renovation of playgrounds that contain structures with pressure-treated wood.

The disposal of pressure-treated wood is regulated by California State agencies. Pursuant to the California Health and Safety Code (HSC) Sec. 25150.7 and 25150.8 as amended by Assembly Bill 1353 (2004), treated wood with arsenic levels greater than 500 ppm must be stabilized and disposed of as “hazardous waste.”¹³⁴ Although sealable, not ingestible, and given a P6 rating in the RPD A-HA program, the square and round posts of the playground were still found to contain arsenic levels higher than 500 ppm. Therefore, they would be required to be disposed of as hazardous waste.

HSC Sec. 251450.7(g)(2) requires that “any size reduction of treated wood waste is conducted in a manner that prevents the uncontrolled release of hazardous constituents to the environment, and that conforms to applicable worker health and safety requirements.” In addition, “all sawdust and other particles generated during the size reduction are captured and managed as treated wood waste.” The A-HA program therefore requires that sawing of timbers for waste disposal occurs off-site at a facility designated by the contractor. Such facilities shall include High-

¹³³ SCA Environmental, Inc. Arsenic Guidance: Arsenic in Playstructures Response Ranking System. Oakland, CA, June 2003. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in File No. 2010.0641E.

¹³⁴ Western Wood Preserves Institute, *Management of Treated Wood Products: Addendum for the Western United States*, <http://www.wwpinstitute.org/pdffiles/westernstatesdisp.pdf>, accessed August 18, 2011.

efficiency particulate absorption (HEPA) attachment on all saws and a dust collection system. Where open cutting with chain saws will occur (offsite), the workers shall wear HEPA-filtered PAPRs. Workers should use polyethylene or canvas drop cloths extended from at least a 20-ft radius from the sawing activities to collect nuisance sawdust. Loose debris and materials shall be HEPA-vacuumed from the ground. Nearby landscaping and buildings, including HVAC vents shall be covered with polyethylene sheeting to prevent dust infiltration, as applicable. All collected saw dust will be disposed of as hazardous waste.

If sawing has to be done onsite, all sawing activities would have to be done within a negatively pressurized containment ducted to a HEPA-filtered unit (minimum 600 CFM). The containment will have to enclose the entire saw while allowing the saw operator to stay outside, and while trapping 100 percent of the sawdust. Burning of waste is not permitted. All collected saw dust will be disposed of as hazardous waste. The material must also meet the individual landfill's requirements for acceptance. Depending on the waste profile, concrete, sand and soils that surrounded the arsenic-treated wood may generally be disposed of as non-hazardous waste. Concrete materials are recycled, where feasible. Written notification to each receiving entity documents that it is fully aware of the presence of arsenic in the non-hazardous waste.

Subsequent projects that may result from the draft ROSE Update would be subject to project specific environmental review to determine whether they would result in the handling or disposal of pressure-treated wood and whether such wood has the potential to contain arsenic. In such an instance, adherence to the above measures would be required. Implementation of the draft ROSE Update would neither conflict with nor prelude RPD from implementing its program to regulate arsenic, and this impact is considered less than significant.

Asbestos

Asbestos-containing materials may be found within some of RPD or other City structures that could be renovated or demolished in the future in the context of implementing the draft ROSE Update. Section 19827.5 of the California HSC, adopted January 1, 1991, requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. The California Legislature has vested the BAAQMD with authority to regulate airborne pollutants, including asbestos, through both inspection and law enforcement. BAAQMD is to be notified ten days in advance of any proposed demolition or abatement work. Notification includes the names and addresses of operations and persons responsible; a description and location of the structure to be demolished or altered, including size, age, and prior use, and the approximate amount of friable asbestos; scheduled starting and completion dates of demolition or abatement; nature of planned work and methods to be used; procedures to be used to meet BAAQMD requirements; and the name and location of the waste disposal site to be used. The BAAQMD randomly inspects asbestos removal operations and would inspect any removal operation for which it has received a complaint.

The local office of the Occupational Safety and Health Administration must be notified of asbestos abatement to be carried out. Asbestos abatement contractors must follow state regulations contained in 8CCR1529 and 8CCR341.6 through 341.14, where there is

asbestos-related work involving 100 square feet or more of ACM. Asbestos removal contractors must be certified as such by the Contractors State License Board. The owner of the property where abatement is to occur must have a Hazardous Waste Generator Number assigned by and registered with the Office of the California Department of Health Services in Sacramento. The contractor and hauler of the material are required to file a hazardous waste manifest that details the hauling of the material from the project site and the disposal of it. Pursuant to California law, the San Francisco DBI would not issue the required permit until the applicant has complied with the above notice requirements. Compliance with these regulations and procedures, already established as a part of the permit review process, would ensure that potential impacts of demolition due to asbestos would be reduced to a less than significant level.

Lead-based Paint

Recreational facilities that may be renovated in the future, resulting from the draft ROSE Update would be required to comply with Chapter 34, Section 3426, of the San Francisco Building Code, Work Practices for Lead-Based Paint (LPB) on Pre-1979 Buildings and Steel Structures. Chapter 34 requires specific notification and work standards and identifies prohibited work methods and penalties. This would apply where there is any work that may disturb or remove lead paint on any building built on or before December 31, 1978, or on any steel structures where LBP would be disturbed or removed and where exterior work would disturb more than 100 square feet or 100 linear feet of LBP.

Section 3426 applies to buildings or steel structures built before 1979, which are assumed to have LBP on their surfaces unless a certified lead inspector assessor tests surfaces for lead and determines it is not present, according to the definitions of Section 3426. The ordinance contains performance standards, including establishment of containment barriers at least as effective at protecting human health and the environment as those in the Department of Housing and Urban Development Guidelines (the most recent guidelines for evaluation and control of lead-based paint hazards). The ordinance also identifies prohibited practices that may not be used when disturbing or removing LBP. Any person performing work subject to the ordinance should, to the maximum extent possible, protect the ground from contamination during exterior work, should protect floors and other horizontal surfaces from work debris during interior work and should make all reasonable efforts to prevent migration of lead-paint contaminants beyond containment barriers during the course of the work. Cleanup standards require the removal of visible work debris, including the use of a high efficiency particulate air filter vacuum following interior work. Chapter 34, Section 3426, also includes notification requirements, information the notice should contain, and requirements for signs. Notification includes notifying project construction contractors of any paint-inspection reports that verify the presence or absence of LBP in the regulated area of the proposed project. Before work, the responsible party must provide written notice to the Director of DBI of the following:

- Location of the project;
- The nature and approximate square footage of the painted surface being disturbed or removed;
- Anticipated job start and completion dates for the work;
- Whether the responsible party has reason to know or presume that LBP is present;

- Whether the building is residential or nonresidential, owner-occupied or rental property, approximate number of dwelling units, if any;
- The dates that the responsible party has or would fulfill any tenant or adjacent property notification requirements; and
- The name, address, telephone number, and pager number of the party who would perform the work.

Further notice requirements include posting signs when containment is required, the landlord notifying tenants of the impending work, the availability of a pamphlet about lead in the home, notice by contractor of the early commencement of work, and notice of lead-contaminated dust or soil, if applicable. The ordinance contains provisions regarding inspection and sampling for compliance by DBI and enforcement and describes penalties for noncompliance. The regulations and procedures established by the San Francisco Building Code would ensure that potential impacts from LBP disturbance during construction would be reduced to a level of insignificance. These regulations and procedures are already established as a part of the permit review process to further ensure their implementation. They would ensure that potential impacts of rehabilitation related to LBP would be reduced to a level of insignificance. Implementation of the draft ROSE Update would not conflict with the Building's Codes provisions that deal with LBP, and this impact is considered less than significant.

PCBs and Mercury

PCBs are regulated under federal and state law. Byproducts of PCB combustion are known carcinogens and are respiratory hazards, so specific handling and disposal of PCB-containing products is required. PCBs are most commonly found in lighting ballasts, wet transformers, and electrical equipment that uses dielectric fluids. PCBs are also occasionally found in hydraulic fluids.

Hazardous Soil and Groundwater

Future projects that may result from the draft ROSE Update may involve soil disturbance activities within a site that contains hazardous soils or groundwater. Depending on the location of such future projects and extent of the soil disturbing activities, the future projects would be subject to Article 22A of the Health Code, also known as the Maher Ordinance, which is administered and overseen by DPH. The Maher Ordinance requires the project sponsor to retain the services of a qualified professional to prepare a Phase I Environmental Site Assessment (ESA) that meets the requirements of Health Code Section 22.A.6. The Phase I would determine the potential for site contamination and level of exposure risk associated with the project. Based on that information, the project sponsor may be required to conduct soil and/or groundwater sampling and analysis. Where such analysis reveals the presence of hazardous substances in excess of state or federal standards, the project sponsor is required to submit a site mitigation plan (SMP) to DPH or other appropriate state or federal agency(ies), and to remediate any site contamination in accordance with an approved SMP prior to the issuance of any building permit or the commencement of any soil disturbing activities.

For departments, boards, commissions and agencies of the City that authorize construction or improvements on land under their jurisdiction where no building or grading permit is required,

the ordinance requires protocols be developed between that entity and DPH that will achieve the environmental and public health and safety goals of Article 22A.

In light of the above, implementation of the draft ROSE Update would not result in a significant hazard to the public or environment from contaminated soil and/or groundwater and would result in a less than significant impact.

Impact HZ-3: Implementation of the draft ROSE Update would not substantially emit hazardous emissions or acutely hazardous materials to schools. (Less than Significant with Mitigation)

As discussed in HZ-1 above, the draft ROSE Update would not directly create significant hazards, though implementation of future projects that may result from the draft ROSE Update may require the use of motor vehicles and motorized equipment for the management of activities such as tree removal or pruning, erosion control and trail maintenance. The exact location and quantity of potential hazardous materials associated with future projects or management activities is unknown.

Although hazardous materials and waste generated from future projects of may pose a health risk to nearby schools, all businesses associated with housing construction that handle or involve on-site transportation of hazardous materials would be required to comply with the provisions of the City's Fire Code and any additional regulations as required in the California Health and Safety Code Article 1 Chapter 6.95 for a Business Emergency Plan, which would apply to those businesses associated with construction activities. Both the federal and state governments require all businesses that handle more than a specified amount of hazardous materials to submit a business plan to a regulating agency. In addition, implementation of federal and state regulations would minimize potential impacts by protecting schools from hazardous materials and emissions. For example, federal regulations such as Resource Recovery and Conservation Act would ensure that hazardous waste is regulated from the time that the waste is generated until its final disposal, and National Emission Standards for Hazardous Air Pollutants would protect the general public from exposure to airborne contaminants that are known to be hazardous to human health. San Francisco's Hazardous Materials Unified Program Agency is responsible for California Uniform Program Authority in the City and would require all businesses (including city contractors) handling hazardous materials to create a Hazardous Materials Business Plan which would reduce the risk of an accidental hazardous materials release.

Impact HZ-4: Implementation of the draft ROSE Update would not expose people or structures to a significant risk of loss, injury, or death involving fires and would not interfere with the implementation of an emergency response plan. (Less than Significant)

San Francisco ensures fire safety and emergency access within new and existing developments by its building and fire codes. Implementation of future projects that may result from the draft ROSE Update would conform to these standards, which may include development of an emergency procedure manual and an exit drill plan for specific developments, as applicable. Therefore, potential fire hazards would be addressed during the permit review process for a specific

undertaking. Conformance with these standards would ensure appropriate life safety protections for park and recreational facilities.

Implementation of the draft ROSE Update's policies and objectives would not conflict with existing laws, programs and practices geared toward regulating hazardous wastes. Future recreation, open space and park projects would be required to adhere to pertinent local, state and federal laws pertaining to hazardous materials use, transport, exposure, management and disposal. The draft ROSE Update would have a less-than-significant impact on hazards and hazardous materials.

Impact C-HZ: Implementation of the draft ROSE Update, in combination with past, present, and reasonably foreseeable future projects, would not have a substantial cumulative impact with hazards and hazardous materials. (Less than Significant)

As of February 2014, there are no known past, present, or reasonably foreseeable projects in or near parks and open spaces under the jurisdiction of the RPD that would interact with the proposed project to result in cumulative significant impacts with respect to hazards and hazardous materials. Reasonably foreseeable future projects in or near parks and open spaces under the jurisdiction of the RPD include projects related to the 2008 Clean and Safe Parks Bond,¹³⁵ the 2012 Parks Bond,¹³⁶ the SNRAMP, and several athletic field renovations. These projects primarily involve renovation of existing parks and open spaces.

As a policy document, the ROSE would not directly result in physical impacts, and would not be expected to result in indirect impacts that would demonstrably contribute considerably to cumulative impacts from projects affecting or in the vicinity of open space and recreation resources. Implementation of the draft ROSE Update would have less-than-significant impacts on hazards and hazardous materials. Impacts from hazards are generally site-specific, and typically do not result in cumulative impacts. Therefore, implementation of the draft ROSE Update would not contribute to cumulatively considerable significant effects related to hazards and hazardous materials. For the reasons discussed above, the proposed project's impacts related to hazards and hazardous materials, both individually and cumulatively, would be less than significant.

¹³⁵ SFRPD. 2008 Clean and Safe Parks Bond. Available online at: <http://sfrecpark.org/park-improvements/2008-clean-safe-bond/>. Accessed February 19, 2014.

¹³⁶ SFRPD. 2012 Parks Bond. Available online at: <http://sfrecpark.org/park-improvements/2012-bond/>. Accessed February 19, 2014.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
17. MINERAL AND ENERGY RESOURCES— Would the project:					
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
c) Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact ME-1: The draft ROSE Update would not result in the loss or availability of known mineral resources or locally-important mineral resource recovery sites. (No Impact)

All land in the City is designated Mineral Resource Zone 4 (MRZ-4) by the California Division of Mines and Geology (CDMG) under the Surface Mining and Reclamation Act of 1975.¹³⁷ This designation indicates that there is inadequate information available for assignment to any other MRZ and therefore the City is not a designated area of significant mineral deposits. No area within the City is designated as a locally-important mineral resource recovery site. There are no known mineral resource sites at Sharp Park or Camp Mather.

Impact ME-2: The draft ROSE Update would not result in the use of large amounts of fuel, water or energy, or use these resources in a wasteful manner. (Less than Significant)

Future recreational uses that could be developed resulting from the draft ROSE Update would use energy produced in regional power plants using hydropower and natural gas, coal and nuclear fuels. New buildings in San Francisco are required to conform to energy conservation standards specified by Title 24 of the California Code of Regulations. Documentation showing compliance with these standards is submitted with the application for a building permit. Title 24 is enforced by DBL.

Pursuant to the San Francisco Green Building Ordinance (No. 180-08), all new municipal buildings in the City are required to obtain US Green Building Council Leadership in Energy and Environmental Design (LEED) Silver Certification. This certification system could require future projects to incorporate best management practices in sustainable site development, water savings, energy efficiency, materials selection and indoor environmental quality where feasible. Policy 4.3 of the draft ROSE Update calls for "Integrat[ing] the protection and restoration of local biodiversity into all open space construction, renovation, management and maintenance using environmentally sustainable design principles." In addition, Policy 4.4 of the draft ROSE Update

¹³⁷ California Division of Mines and Geology, Open File Report 96-03 and Special Report 146 Parts I & II.

states "Include environmentally sustainable practices in construction, renovation, management and maintenance of open space and recreation facilities."

Given that future projects would be required to adhere to Title 24 provisions as well as the Green Building Ordinance, implementation of the draft ROSE Update would have a less-than-significant impact on energy use.

Impact C-ME: Implementation of the draft ROSE Update, in combination with the past, present, and reasonably foreseeable future projects, would result in less than significant cumulative impacts to energy and minerals. (Less than Significant)

As of February 2014, there are no known past, present, or reasonably foreseeable projects in or near parks and open spaces under the jurisdiction of the RPD that would interact with the proposed project to result in cumulative significant impacts with respect to energy or minerals. Reasonably foreseeable future projects in or near parks and open spaces under the jurisdiction of the RPD include projects related to the 2008 Clean and Safe Parks Bond,¹³⁸ the 2012 Parks Bond,¹³⁹ the SNRAMP, and several athletic field renovations. These projects primarily involve renovation of existing parks and open spaces.

As a policy document, the ROSE would not directly result in physical impacts, and would not be expected to result in indirect impacts that would demonstrably contribute considerably to cumulative impacts from projects affecting or in the vicinity of open space and recreation resources. Implementation of the draft ROSE Update would have less-than-significant impacts on mineral and energy resources and would not contribute to any cumulative impact on mineral and energy resources. For the reasons discussed above, the proposed project's impacts related to mineral and energy resources, both individually and cumulatively, would be less than significant.

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¹³⁸ SFRPD. 2008 Clean and Safe Parks Bond. Available online at: <http://sfrecpark.org/park-improvements/2008-clean-safe-bond/>. Accessed February 19, 2014.

¹³⁹ SFRPD. 2012 Parks Bond. Available online at: <http://sfrecpark.org/park-improvements/2012-bond/>. Accessed February 19, 2014.

<u>Topics:</u>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
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18. AGRICULTURE AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

—Would the project

- | | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)) or timberland (as defined by Public Resources Code Section 4526)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Result in the loss of forest land or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Impact AG-1: The draft ROSE Update would not conflict with zoning for agricultural use, result in the loss of forest land, or otherwise convert farmland or forest land to non-agricultural or non-forest use. (No Impact).

The City is located within an urban area, which the California Department of Conservation's Farmland Mapping and Monitoring Program identifies as Urban and Built-Up Land, defined as "... land [that] is used for residential, industrial, commercial, institutional, public administrative purposes, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes."

The project site does not contain agricultural uses and is not zoned for such uses. Implementation of the draft ROSE Update would not convert any prime farmland, unique farmland or Farmland of Statewide Importance to non-agricultural use. It would not conflict with existing zoning for agricultural land use or a Williamson contract, nor would it involve any changes to the environment that could result in the conversion of farmland. Accordingly, Initial Study Checklist Topics 17a, 17b, and 17c are not applicable to the ROSE Update.

<u>Topics:</u>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
19. MANDATORY FINDINGS OF SIGNIFICANCE— Would the project:					
a) Have the potential to 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, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have impacts that would be individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

As discussed above, the proposed project is anticipated to have only less-than-significant impacts in the environmental topics discussed. The proposed project would not result in a considerable contribution to any cumulatively significant impacts.

In light of the above, the proposed project would not result in any significant impacts.

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F. PUBLIC NOTICE AND COMMENT

The following is a summary of other public entities who have participated in the planning and policy development of the draft ROSE Update.

Open Space Task Force: In November 2007, the Mayor's Office launched the Mayor's Open Space Task Force. This Task Force was composed of over 80 landscape architects, open space advocates and residents from around the City. The Task Force met over the course of a year, concluding in January 2009, and developed emerging themes for action, which set the structure for the Open Space Framework.

City Roundtable: Led by the Mayor's Office, all City agencies with lands or responsibilities related to open space or recreation met regularly to share ideas, update each other on programs, and discuss future possibilities for the City's open space network. Participants include the DPW, Port, the Redevelopment Agency, the Unified School District, and others.

Working committees: Members of the Mayor's Open Space Task Force, as well as individuals representing specific open space perspectives, worked closely with staff in a series of working committees and focus meetings. These work groups meet in the interim of the larger Task Force meetings in order to compile Task Force outcomes and flesh out details on specific programs. They also looked at topics including Finance, Planning and Programming, Policy and Implementation, Natural Areas, Pedestrian and Bicycle Access, and others. The working committees created a number of specific policies, as well as recommendations for action.

Community workshops: The Neighborhood Parks Council (which has since merged with another organization and is called the Parks Alliance) and the City Open Space team spent three months meeting with neighborhoods and organizations throughout the City on the key goals of the Recreation and Open Space Plan. At each community workshop, citizens gave feedback on favorite open space(s) in San Francisco, pointed out opportunities for new open spaces in their neighborhood, and talked about what types of spaces, facilities, and programs were needed to enhance the open space experience in the City. Working in small groups, participants reported back on their priorities for open space moving forward in the future.

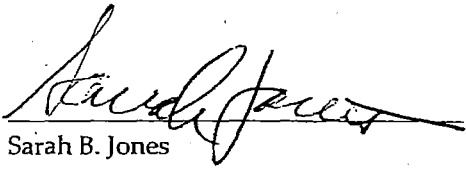
City Focus Groups and stakeholder meetings: The City also hosted a series of focus groups and meetings related to specific interests, e.g., youth, bicycle and pedestrian groups, natural areas, etc. City staff also had one-on-one meetings with interested parties throughout the process.

Public Hearings: City staff had publicly noticed meetings with the Parks and Recreation Open Space Advisory Committee, the Recreation and Parks Department Commission, the Historic Preservation Commission and the Planning Commission throughout this process.

G. DETERMINATION

On the basis of this Initial Study:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, no further environmental documentation is required.

DATE February 24, 2014 
Sarah B. Jones
Environmental Review Officer
for
John Rahaim
Director of Planning

H. INITIAL STUDY PREPARERS

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Environmental Planning
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SAN FRANCISCO PLANNING DEPARTMENT

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Re: Adoption of the Recreation and Open Space Element Update of the General Plan

Dear members of the Board of Supervisors,

The San Francisco Planning Department is seeking your support in adopting the update to the Recreation and Open Space Element (ROSE) of the General Plan, adopted by the Planning Commission on April 3, 2014. This effort started in 2007 including extensive outreach to engage many community groups and organizations interested in recreation and open space. The updated ROSE also reflects close interagency coordination between many agencies, including Planning, Recreation and Parks, the Port, and the Department of the Environment, as well as community non-profit partners including the Parks Alliance and Trust for Public Land.

General Plan Elements are high level policy and visionary documents that set the City's strategy, guide and direct decisions, and also showcase the city's vision to its own citizens and decision makers as well as to a national and international audience. The General Plan does not mandate or direct specific programs, legislation, or expenditures, but serves as a guiding policy framework by which the activities of City government are evaluated for consistency. It is challenging to create a guiding policy document that does not get caught up in the details of regulating or prescribing every action or program that decision makers or agencies might take, but rather establishes a framework for decisions. To tackle this challenge, we completed a long journey of learning, listening and collaborating with all constituents to present a balanced vision for recreation and open space in San Francisco. The last time the ROSE policies were updated was 1986. As the Planning Department of a city at the forefront of progressive planning, we believe it is crucial to update our vision for recreation and open space for the next 20 years.

The ROSE 2014 offers major directions the City should pursue when planning for recreation and open space. First is to capitalize on the existing valuable and extensive network of existing resources, to better utilize, preserve, and maintain these resources. Second, the City should expand the open space system to provide a well-connected network that is accessible, addresses

diversified needs, and prioritizes underserved areas. Third, the ROSE emphasizes environmental sustainability to enhance local biodiversity, and to pursue sustainable design efforts in the maintenance or design of our parks and recreational facilities. Finally, an underlying theme in the ROSE underscores community engagement and stewardship when planning and programming for recreation and open space.

We are delighted to present the ROSE before the Board for adoption after seven years of extensive outreach and collaboration with community members. On Monday June 16, the Land Use Committee of the Board heard this project and forwarded it to the full Board for its consideration. At that committee hearing, many recreation and open space advocacy organizations such as Parks Alliance and Trust for Public Land as well as other members of the community strongly supported the adoption of these policies. We also heard from a number of community members about their concern over one particular policy in this document. Policy 4.2 of the ROSE calls the city to "establish a coordinated management approach for designation and protection of natural areas and watershed lands." This policy recommends an inventory of all natural areas in the City in order to inform coordinated management efforts between the City and other land-owning entities (eg state, federal, private). This policy does *not* mandate specific management practices or require any specific treatment to identified natural areas (e.g. removal of eucalyptus trees or restricting access). This policy also does *not* prescribe expanding the Recreation and Parks Department Natural Areas Management Program (SNRAMP) to any area that is potentially identified. The SNRAMP is an independent program that is under development and will be before decision makers at a future date. There is already a Natural Areas Management Plan, adopted in 1995, that is in effect. Regardless of the outcome of the current SNRAMP effort this plan is in place and being implemented. It is also worth pointing out that the current ROSE (adopted in 1986) directs more strictly to preserve natural areas without recognizing the local biodiversity in the City. The 2014 ROSE update, however, focuses more on preserving local biodiversity, defining the term as inclusive of *all* plant and wildlife habitats and not just natural areas.

The six objectives in the ROSE and their underlying policies would direct all city agencies and recreation and open space constituents to create a well-connected and rich open space system that addresses the diversity of needs of San Franciscans. These policies do not prescribe any specific projects to occur or management practices to be undertaken but lay out the framework directing our actions related to recreation and open space. The ROSE stresses the need for further extensive community collaboration for all recreation and open space projects.


Lastly I would like to emphasize the need for adoption of the 2014 ROSE update as without this update the City will miss the opportunity to approve multiple forward looking planning ideas as adopted city policy: the 1986 ROSE includes an outdated priority areas for acquisition; it does not include criteria to oversee expansion of recreational and cultural buildings on open spaces; it focuses strictly on preserving natural areas without recognizing that local biodiversity includes native and non-native habitats; it does not recognize living alleys, Parklets, POPOS, or streetscape

improvements as vital supplements to our open space system; Green Connections project and the focus on well-connect and accessible open space system is absent from the ROSE 1986; and finally it does not discuss the need for community engagement and stewardship, which is stressed in a whole objective in the 2014 update.

On Monday June 16 Land Use Committee hearing, Supervisor Weiner made an amendment to the Resolution underlying the fact that approval of the Rose does not constitute approval of any specific project. Specific projects or programs will need to come before decision-makers and adopting the ROSE doesn't preclude any such review and approval process, and that Supervisor Wiener's addition to the resolution rightly emphasizes this point

Please contact us with any questions you may have. We are happy to meet with you and answer any questions.

Sincerely,



John Rahaim
Director of Planning



-An-
ELEMENT
of the San Francisco
General Plan



RECREATION & OPEN SPACE



FINAL April 2014

SAN FRANCISCO
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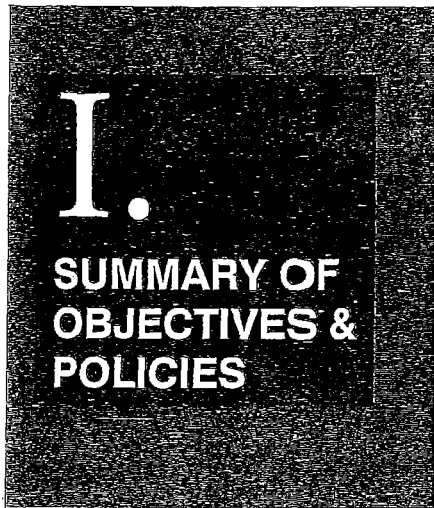
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OBJECTIVE 1

ENSURE A WELL-MAINTAINED, HIGHLY UTILIZED, AND INTEGRATED OPEN SPACE SYSTEM

POLICY 1.1

Encourage the dynamic and flexible use of existing open spaces and promote a variety of recreation and open space uses, where appropriate.

POLICY 1.2

Prioritize renovation in highly-utilized open spaces and recreational facilities and in high needs areas.

POLICY 1.3

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

POLICY 1.4

Maintain and repair recreational facilities and open spaces to modern maintenance standards.

POLICY 1.5

Prioritize the better utilization of McLaren Park, Ocean Beach, the Southeastern Waterfront and other underutilized significant open spaces.

POLICY 1.6

Support the continued improvement of Golden Gate Park while preserving the beauty of its landscape.

POLICY 1.7

Support public art as an essential component of open space design.

POLICY 1.8

Support urban agriculture and local food security through development of policies and programs that encourage food production throughout San Francisco.

POLICY 1.9

Preserve sunlight in public open spaces.

POLICY 1.10

Ensure that open space is safe and secure for the City's entire population.

POLICY 1.11

Encourage private recreational facilities on private land that provide a community benefit, particularly to low and moderate-income residents.

POLICY 1.12

Preserve historic and culturally significant landscapes, sites, structures, buildings and objects.

POLICY 1.13

Preserve and protect character-defining features of historic resources in City parks, when it is necessary to make alterations to accommodate new needs or uses.

OBJECTIVE 2

INCREASE RECREATION AND OPEN SPACE TO MEET THE LONG-TERM NEEDS OF THE CITY AND BAY REGION

POLICY 2.1

Prioritize acquisition of open space in high needs areas.

POLICY 2.2

Provide and promote a balanced recreation system which offers a variety of high quality recreational opportunities for all San Franciscans.

POLICY 2.3

Provide recreational programs that are responsive to community needs and changing demographics.

POLICY 2.4

Support the development of signature public open spaces along the shoreline.

POLICY 2.5

Encourage the development of region-serving open spaces in opportunity areas: Treasure Island, Yerba Buena Island, Candlestick and Hunters Point Shipyard.

POLICY 2.6

Support the development of civic-serving open spaces.

POLICY 2.7

Expand partnerships among open space agencies, transit agencies, private sector and nonprofit institutions to acquire, develop and/or manage existing open spaces.

POLICY 2.8

Consider repurposing underutilized City-owned properties as open space and recreational facilities.

POLICY 2.9

Address physical and bureaucratic barriers to opening schoolyards as community open space during non-school hours.

POLICY 2.10

Improve access to and level of activity provided at San Francisco reservoirs.

POLICY 2.11

Assure that privately developed residential open spaces are usable, beautiful, and environmentally sustainable.

POLICY 2.12

Expand the Privately-owned Public Open Spaces (POPOS) requirement to new mixed-use development areas and ensure that spaces are truly accessible, functional and activated.

OBJECTIVE 3.**IMPROVE ACCESS AND CONNECTIVITY TO OPEN SPACE****POLICY 3.1**

Creatively develop existing publicly-owned right-of-ways and streets into open space.

POLICY 3.2

Establish and implement a network of Green Connections that increases access to parks, open spaces, and the waterfront.

POLICY 3.3

Develop and enhance the City's recreational trail system, linking to the regional hiking and biking trail system and considering restoring historic water courses to improve stormwater management.

POLICY 3.4

Encourage non-auto modes of transportation – transit, bicycle and pedestrian access—to and from open spaces while reducing automobile traffic and parking in public open spaces.

POLICY 3.5

Ensure that, where feasible, recreational facilities and open spaces are physically accessible, especially for those with limited mobility.

POLICY 3.6

Maintain, restore, expand and fund the urban forest.

OBJECTIVE 4.**PROTECT AND ENHANCE THE BIODIVERSITY, HABITAT VALUE, AND ECOLOGICAL INTEGRITY OF OPEN SPACES AND ENCOURAGE SUSTAINABLE PRACTICES IN THE DESIGN AND MANAGEMENT OF OUR OPEN SPACE SYSTEM****POLICY 4.1**

Preserve, protect and restore local biodiversity.

POLICY 4.2

Establish a coordinated management approach for designation and protection of natural areas and watershed lands.

POLICY 4.3

Integrate the protection and restoration of local biodiversity into open space construction, renovation, management and maintenance.

POLICY 4.4

Include environmentally sustainable practices in construction, renovation, management and maintenance of open space and recreation facilities.

OBJECTIVE 5.**ENGAGE COMMUNITIES IN THE STEWARDSHIP OF THEIR RECREATION PROGRAMS AND OPEN SPACES****POLICY 5.1**

Engage communities in the design, programming and improvement of their local open spaces, and in the development of recreational programs.

POLICY 5.2

Increase awareness of the City's open space system.

POLICY 5.3

Facilitate the development of community-initiated or supported open spaces.

POLICY 5.4

Reduce governmental barriers to community-initiated recreation and open space efforts.

POLICY 5.5

Encourage and foster stewardship of open spaces through well-run, active volunteer programs.

OBJECTIVE 6.**SECURE LONG-TERM RESOURCES AND MANAGEMENT FOR OPEN SPACE ACQUISITION, AND RENOVATION, OPERATIONS, AND MAINTENANCE OF RECREATIONAL FACILITIES AND OPEN SPACE****POLICY 6.1**

Pursue and develop innovative long-term funding mechanisms for maintenance, operation, renovation and acquisition of open space and recreation.



II.

INTRODUCTION



With its dramatic physical setting comprised of hilltops and mountains, surrounded by the bay and ocean, with nature woven through the landscape, San Francisco has an intrinsic connection with its environment. The opportunity the City provides to move outside and connect with nature has drawn countless thousands here over time, and that draw continues today.

As our City grows, we must not lose sight of these very qualities. If San Francisco is to continue to offer its residents, visitors, and workers a vibrant, civic, livable environment connected with the wonders of the natural world, we need a framework that ensures a world-class open space system. The goal of the City's Recreation and Open Space Element is to continue the City's legacy of fine parks and recreational opportunities, and guide the City's future decisions so they improve that open space system for the benefit of everyone.

Why Is Recreation and Open Space Important?

Recreation and open space are critical components of any community's quality of life; for San Franciscans they are defining elements of the City itself. The City's open space system provides places for recreation, activity and engagement, for peace and enjoyment, and for freedom and relief from the built world. It serves the social and environmental health of the City, providing a sustainable environment. Among its benefits:

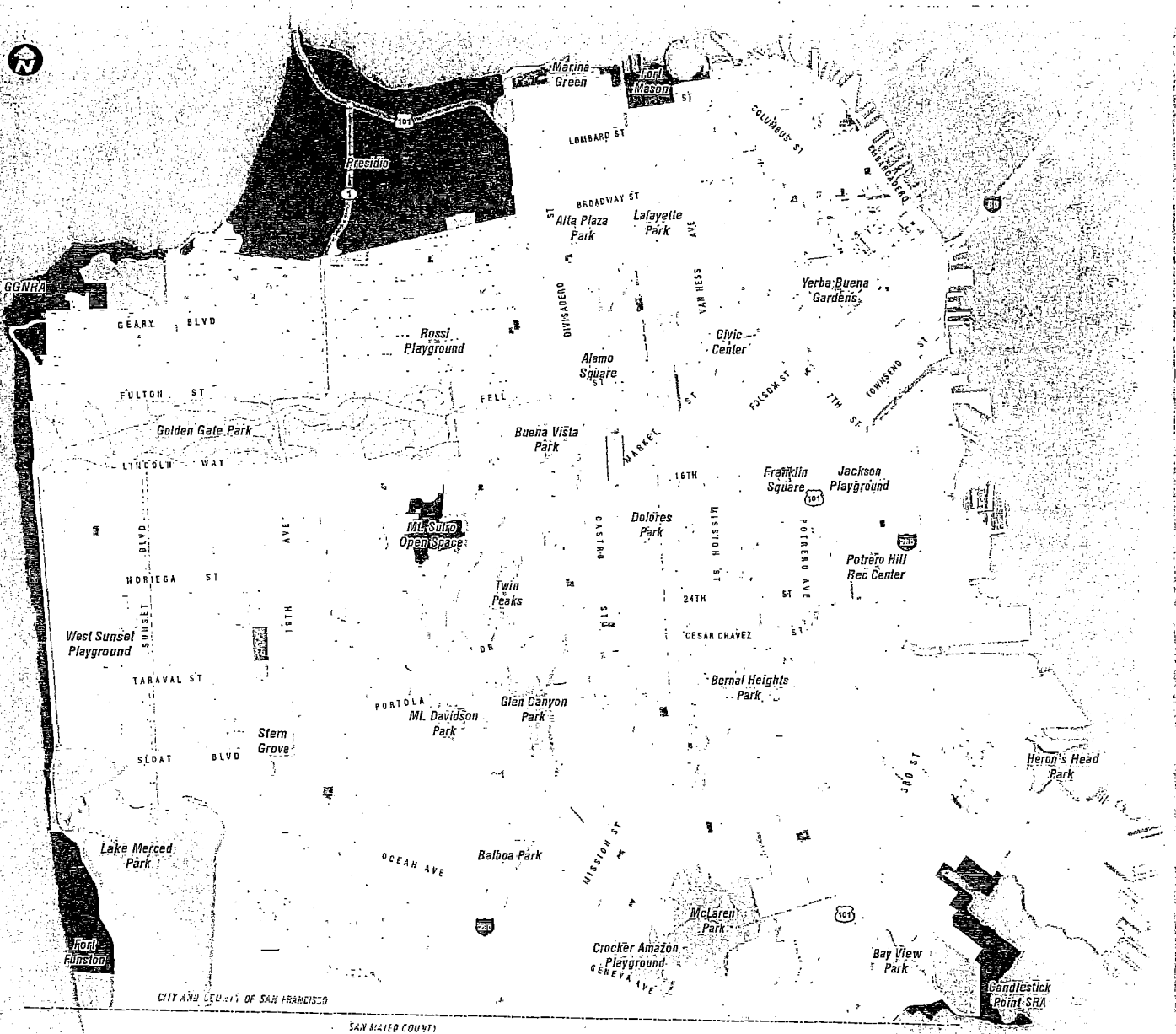
- **Open space and recreation activities improve residents' physical and mental health.** Open spaces and recreational facilities offer a wide range of health related benefits. They provide an opportunity for residents and visitors to exercise, give residents access to sunshine, nature and fresh air, and even encourage people to walk or bike from place to place. They can have a significant impact on people's stress levels and overall mental health, particularly in urban areas like San Francisco, and can be proven to be actual preventative measures that impact positively on health care and health care costs. Physical recreation reduces obesity and risk of cardiovascular disease, diabetes and other health ailments. Public open spaces, whether playgrounds, picnic fields or even just engaging streets, can help build community by giving neighbors a realm in which to get to know each other, and giving children a safe place to play.
- **Open space promotes environmental sustainability.** Natural habitat provides sanctuary for wildlife species ranging from mammals, birds and insects to plants; trees and other types of vegetation provided in open space networks can reduce air pollution; and wetlands can filter contaminants. The trails and streets of an open space network can also aid in reducing greenhouse gases, by providing alternative transportation routes and promoting bicycling and walking.
- **Open space and recreation activities can help to address environmental justice across a community.** Public recreation provides accessible and low cost

opportunities to all San Franciscans, regardless of income level. High rates of childhood obesity and illness often correspond to fewer acres of usable open space. Provision of open space in areas with high concentrations of density, poverty, youth or seniors can redress equity issues. A clear example is how local food production increases access to fresh local produce and provides an opportunity for communities to connect with nature.

- **Open space provides tangible economic benefit.** Numerous studies have quantified the dollars that parks and tree plantings bring back to a city, by making the area more attractive for investment, by attracting and expanding local businesses, by increasing tourism and by enhancing property values. The Trust for Public Lands' study, *The Economic Benefits of Parks & Open Space*, cited testimony that our own Golden Gate Park has been shown to increase the value of nearby property to the tune of \$5-\$10 million additional dollars annually.

How Are We Doing in Providing Recreation and Open Space?

By any measure, San Francisco is performing well against its urban counterparts. San Francisco has well over 3,400 acres of recreation and open space owned and managed by the Recreation and Park Department (RPD). It also contains over 250 acres of open space owned and managed by the State of California, and another 1600 acres of federally-owned open space. These publicly-owned open spaces make up almost 20% of the City's total land area. The quantity of usable open space increases even more when one includes the other spaces owned by city agencies, college campuses, schoolyards open during non-school hours, urban plazas or other publicly accessible outdoor spaces throughout the City, by another 560 acres. This puts San Francisco among the top five cities in the country in terms of parkland per resident. All of these open spaces are shown in *Map 1: Existing Open Space*.



Existing Open Space

3,433 acres

0 Miles 1

MAP 01



State-Owned Land: 255 acres
Candlestick, Mount Sutro



Federal-Owned Land:
Ocean Beach, Fort Funston, Fort Mason, Lands End, Sutro Heights, China Beach: **642 acres**
Presidio: **1000 acres**



Other: 560 acres
Campuses, pilot program schoolyards, SFPUC lands, SFRA parks, SF Port parks, linear open spaces such as boulevards and parkways, and privately owned, publicly accessible open spaces in the Downtown.

The 2004 Recreation Assessment was the culmination of a nine-month planning effort and process to evaluate the recreation needs of residents and to ensure the future direction of recreation within the SFRPD. The assessment pieced together critical issues, challenges and opportunities. It was the first such report developed solely for recreation in SFRPD's history. The Recreation Assessment identified where the SFRPD should focus its energies and resources as it applies to the Recreation Division, continuing the legacy of high quality recreation facilities and program services for the citizens of San Francisco. SFRPD should regularly assess its recreation component as required in the Charter. See *Map 2* for a map of existing Recreation Facilities.

San Francisco values its recreation and open spaces. In 1974, San Francisco voters passed Proposition J, which directs a percentage of property taxes towards the City's Open Space Fund, to acquire new parks and open space. We spend more than any other urban area per resident on our parks, according to a 2008 report by the Trust for Public Lands, at an average of almost \$200 per resident. But more revenue is needed as land costs increase and as we move to meet the challenges of providing space and recreation opportunities for a growing population.

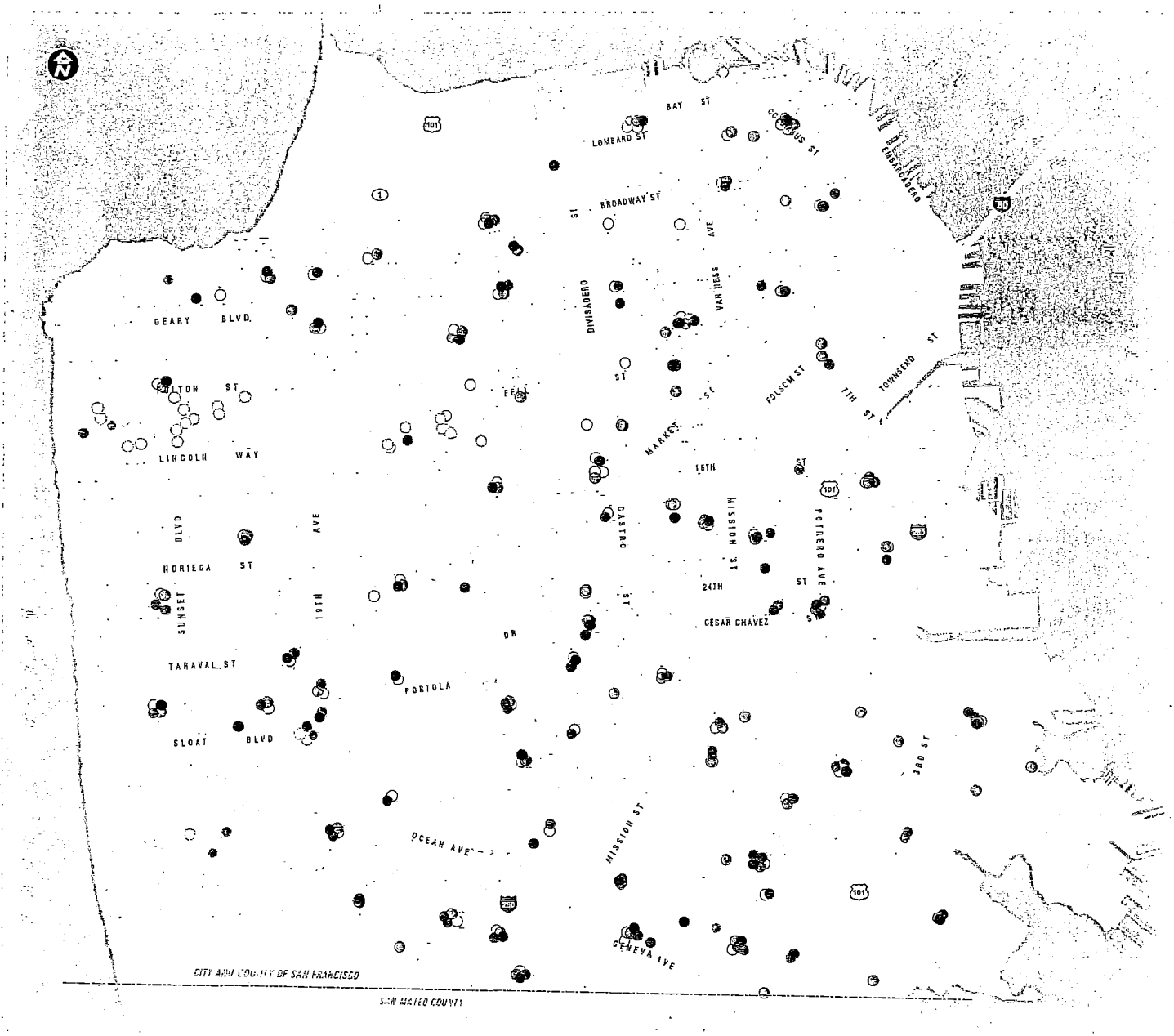
How Do We Define Recreation and Open Space?

Recreation and open space are critical components of any city, and by necessity have to come in different forms and experiences. Open space provides the 'breathing room' in a dense urban environment and promotes opportunities to engage in outdoor activities, access nature, enjoy scenic views, and experience our City's many ecosystems. Recreation includes activities that happen within open space both at outdoor or indoor facilities, the key elements being that the activity is beneficial by way of being fun, stimulating, refreshing, or relaxing in some form, either physical, mental, or the combination of the two. Active recreation involves physical activity while passive recreation usually involves sitting or lying down. Active recreation refers to a mix of uses in a neighborhood park that includes the following facilities types: athletic fields, buildings

or structures for recreational activities, concessions, community gardens, courses or sport courts, children's play areas, dog play areas, or bike paths. A passive recreation area refers to a mix of uses in a park, undeveloped land or minimally improved lands which can include the following: landscaped areas, natural areas, ornamental gardens, non-landscaped greenspaces, stairways, decorative fountains, picnic areas, and water bodies without recreational staffing.

San Francisco's definition of recreation and open space system includes a variety of types of spaces, including traditional spaces and facilities for recreation such as:

- **Recreation Centers:** The City operates 25 multi-use recreation centers, providing playground and sports opportunities, as well as programming for youth, adults and seniors.
- **Playgrounds:** Children's playgrounds including play structures for toddler and older children.
- **Playing fields:** Including baseball courts, soccer fields, basketball and tennis courts, as well as children's and toddlers' playgrounds.
- **Unprogrammed or Unstructured Open areas:** Grassy, landscaped, or even paved open areas provide opportunities for unstructured time away from the dense urban environment.
- **Trails and Natural Areas:** Including 1,100 acres of natural lands, protecting the plant and animal habitats of these unique landscapes for residents and visitors to enjoy, trail systems, and other planted green areas.
- **Cultural Arts and Recreation Centers:** The Recreation and Parks Department offers a variety of classes, community event spaces, and cultural activities such as: art camps, dance and theater classes, programs on music and poetry for all ages.
- **Sports and Athletics:** The City's robust system of sports programs and facilities includes several citywide sports facilities, such as Kezar Complex in Golden Gate Park and Crocker Amazon Park Playground Sports Facility.



CITY AND COUNTY OF SAN FRANCISCO

SAN MATEO COUNTY

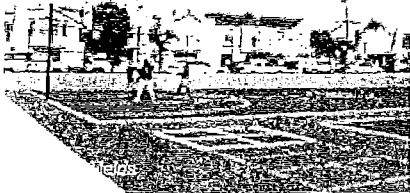
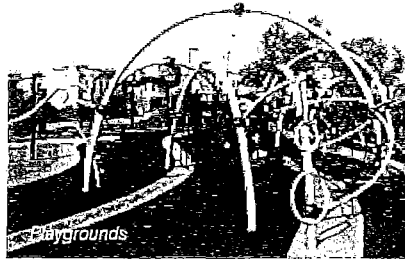
Existing Recreation Facilities

- Ball Field
- Basketball Court
- Clubhouse
- Golf Course
- Soccer Field
- Swimming Pool
- Tennis Court
- Other

"Other" includes activity centers, an archery field, bocce ball courts, a bowling green, equestrian features, a frisbee golf course, a racquetball court, and horseshoe pits.

0 Miles 1

MAP 02



The recreation and open space system also includes spaces that supplement traditional parks in the City such as:

- **Community Gardens:** Opportunities for residents to grow produce and flowers in their neighborhoods.
- **Living Streets, and alleys, plazas or parklets:** These are components of the public right-of-way that have been improved to provide a gathering space and enhance the pedestrian experience.
- **Privately-owned Public Open Spaces (POPOS):** Spaces owned by private development that are accessible to the public. POPOS come in a variety of forms including

plazas, rooftop terraces, Greenhouse, and sun terraces, and include landscaping and public seating for the enjoyment of the public usually in dense neighborhoods.

- **Piers and wharves:** These are waterfront open spaces that provide shoreline access along the Bay edge. The Port provides public access along the perimeter of many of its piers as well as on individual public Piers such as Pier 7 and 14 as well as others.

Lastly, the system also includes spaces unique to San Francisco, such as such as Coit Tower, Union Square, Stern Grove, Palace of Fine Arts, and lesser known amenities like Camp Mather that offers outdoor camping experiences.

Guiding Principles for Open Space and Recreation

San Francisco provides a significant amount of open space already for its residents, particularly given its small land area, its hilly topography, and its density, all of which challenge open space development. But we can do better, particularly in the better utilization, maintenance and design of our open spaces. The policies of the General Plan are intended to improve these aspects of our recreation and open space system. A holistic recreation and open space system encompasses the full range of spaces within our definition of open space, as well as the necessary experiences that are integral to San Francisco's unique identity. The Recreation and Open Space Element follows these guiding principles to ensure such holistic system:

1. INTEGRATED & MULTIFUNCTIONAL. A major theme developed from the outreach process was the concept of "making the most of what we have": utilizing and improving the expansive recreation and open space system the City already provides. An integrated and multi-functional open space network would respond to a variety of needs for recreation and open space, better utilizing the existing resources. Such needs range from refreshing from daily pressures of life to exercising and active sports, from appreciating the beauty of nature to maintaining natural habitats and wildlife, and from enjoying play time for kids and adults to housing civic and cultural events.

2. SENSE OF PLACE. San Francisco is a regional epicenter for ecological, economic, and cultural diversity. Open spaces should aim to build on our City's intrinsic qualities, both natural and cultural, and to reflect the values we place on cultural diversity and biodiversity. Furthermore, they should create a network that inspires a deep connection to place.

3. EQUITY & ACCESSIBILITY. Open space and recreational programs should be equitably distributed. They should provide access for all residents, workers and visitors, and work towards a democratic network that includes all neighborhoods.

4. CONNECTIVITY. San Francisco's network of open spaces should be wholly connected. The open space system should facilitate non-motorized movement, link diverse neighborhoods, be easy to navigate and understand and, where feasible, enhance habitat through connectivity.

5. HEALTH & SAFETY. Open space should increase the City's capacity to be a safe and healthy place to live. Its design should promote social interaction, wellness, and a healthy lifestyle by providing opportunities for physical, cultural and social activities, and a connection to nature.

6. ECOLOGICAL FUNCTION & INTEGRITY. With environmental sustainability as a driving theme, the quantity and quality of natural systems in the City should be preserved and expanded, by promoting aquatic and terrestrial biodiversity, by designing for watershed health, and by implementing environmental, ecological and conservation-minded strategies.

7. SUSTAINING STEWARDSHIP. San Francisco's community members should be actively engaged as participants in its future. Policies should work towards shared, continued stewardship that increases the tangible link between community members and their open space network. Partnerships between public agencies, private business, and community based non-profits, and individual members of the community to foster pride, purpose and community should continue to be developed.

Related Plans and Agency Programs

The Recreation and Open Space Element, along with its related components that make up the City's overall Open Space Framework, aims to provide the elements needed to strive towards San Francisco's goal of a comprehensive open space network: a broad vision, a policy context, and a tangible task list for moving forward. The City also maintains several policy documents, plans and programs that provide direction about specific open space and recreational components, or to certain parts of the City. These include:

Street Park Program

Street Parks is a partnership between San Francisco Parks Alliance and the San Francisco Department of Public Works (DPW) to support the development and maintenance of community-managed open spaces on DPW owned properties, such as streets, stairways, sidewalks, median strips, traffic circles, and vacant lots. Improvements can range from sidewalk landscaping to median plantings to creation of mini-parks in unpaved street right-of-ways and in traffic circles. The program provides technical support on how to accomplish such projects, organizing seminars to assist in building a budget, and can provide matching funds.

Better Streets/Public Realm Planning

The City's Better Streets Plan, adopted in 2010, states that the City's rights-of-way should be "attractive, safe and useable public open space corridors with generous landscaping, lighting and greenery", providers of habitat for urban wildlife, and that they should invite multiple uses, including recreation. The Better Streets Plan provides a set of standards, guidelines, and implementation strategies to govern how the City designs, builds, and maintains its pedestrian environment. A number of public realm planning efforts implementing the principles of the Better Streets Plan are underway.

Community and Area Plans

A number of neighborhood-based planning efforts have been completed or are underway throughout the City. Each neighborhood plan seeks to increase the livability of several of San Francisco's urban neighborhoods by tapping the benefits of growth as a way to build more balanced neighborhoods. Most include capital improvement plans that draw from and build upon the policies of this Element to address a range of neighborhood needs including recreation, open space, and an improved public realm.

Waterfront Land Use Plan and Design and Access Element

The Port of San Francisco's Waterfront Plan was initially adopted by the Port Commission in 1997, defining acceptable uses, policies and land use information applicable to all properties under the Commission's jurisdiction. The Waterfront Plan defines locations for new public-private partnership projects coordinated with major public open space, maritime, and historic preservation improvements along the waterfront. The Design and Access Element of this Plan sets forth policies and site-specific design criteria to direct the location and types of public access and open spaces, public view corridors and urban design along San Francisco's waterfront.

Office of Community Investment and Infrastructure, (Former Redevelopment Agency), Open Space Planning

The Office of Community Investment and Infrastructure, which is the successor agency to the Redevelopment Agency, created a significant amount of open space in its project areas, with more in the planning stages. New parks have been developed at Golden Gateway, in the Western Addition, Yerba Buena Center, Bayview Hunter's Point, Rincon Point - South Beach, and Mission Bay (with additional parks to be developed in Mission Bay) and are a part of recent plans in Hunter's Point Shipyard and in the Transbay area. These spaces are currently being managed by the Office of Community Investment and Infrastructure and a number of different city agencies.

Golden Gate National Recreation Area (GGNRA) Planning Efforts

The GGNRA encompasses a number of open space and parklands throughout Marin, San Mateo and San Francisco, including Alcatraz Island, Crissy Field, the Presidio and the majority of the City's public beaches. A major planning process was recently completed by the SPUR for Ocean Beach to examine ways to manage coastal processes that drive erosion, ensure the future of critical infrastructure, protect natural resources, and activate and enhance the beach to best serve the local and regional populations.

Significant Natural Resource Area Management Plan

The San Francisco Recreation and Parks Department (SFRPD) has developed a Significant Natural Resource Areas Management Plan (SNRAMP) to address the restoration and management of the remaining elements of San Francisco's original ecosystem. The SNRAMP is implemented by the Natural Areas Program, a division in the Recreation and Park Department, and its goal is to restore and enhance remnant natural areas of the City, while also developing and supporting community-based stewardship of these areas. The program also includes a number of volunteer opportunities to engage students, businesses, groups, and individuals in the stewardship of San Francisco's natural lands.

Association of Bay Area Governments Bay Trail Plan and Bay Area Water Trail Plan

The Bay Trail Plan, adopted in 1989, includes a nine-county, 400 mile regional hiking and bicycling trail around the perimeter of San Francisco and San Pablo Bays. The Plan was prepared by the Association of Bay Area Governments pursuant to Senate Bill 100, which mandated that the Bay Trail:

- Provide connections to existing park and recreation facilities,
- Create links to existing and proposed transportation facilities; and,
- Avoid adverse effects on environmentally sensitive areas.

The San Francisco Bay Area Water Plan, adopted in 2005, was developed to create a network of launch and landing sites, or "trail heads". Such network would allow people in human-powered boats and beachable sail craft to enjoy the historic, scenic and environmental richness of San Francisco Bay through continuous, multiple-day and single-day trips on the Bay. The trail will promote safe and responsible use of the Bay, while protecting and increasing appreciation of its environmental resources through education and coordinated, and strategic access to the Bay.

San Francisco Blue Greenway Planning and Design Guidelines

The Blue Greenway Planning and Design Guidelines (draft released in 2011) catalog the open space network along San Francisco's Southeastern Waterfront, identify future open space opportunities; designate roadway designs for streets that link the open spaces, and prioritize improvements between neighborhood connections to the waterfront system of open spaces. In addition, it establishes design guidelines for signage and site furnishings along the entire length, identifies funding for Port projects and outlines a process for continued interagency coordination.

San Francisco's Sustainability Plan

In 1996, a collaboration of multiple city agencies, including the Commission on the Environment, the Planning Department, the Bureau of Energy Conservation, the Recreation and Park Department, and the Solid Waste Management Program; as well as a number of businesses; environmental organizations; elected officials; and concerned individuals, developed a plan for how the City might reach a sustainable development future. While the plan intended to lay out objectives for a five year time-frame, its intent, particularly with regards to "Parks, Open Spaces and Streetscapes" and their vital ecological, social and economic function in the City, is still applicable. The Plan's strategies for how to retain those functions – through increased provision, constant maintenance, additional funding, expanded community participation, and civic commitment – are reflected in the strategies presented in this Element.

Sustainability Plan for Public Parks

Using the 2011 SFRPD Departmental Climate Action Plan as a baseline, the Recreation and Park Department's Sustainability Plan sets forth guidelines for sustainable park practices. These practices offset municipal greenhouse gas emissions through landscape management and operations standards within the SFRPD parks and open spaces system to better manage natural resources, including soils, vegetation, and water. The Sustainability Plan expands the function of SFRPD parks beyond from providing recreational opportunities to mitigation of and adaptation to the effects of global climate change through environmental stewardship, resource conservation, and ecological responsibility.

San Francisco Recreation and Parks Department Project Standards and Design Guidelines

The Project Standards and Design Guidelines were created to ensure a well maintained and actively used park system that supports the long-term health of people, plants, and animals. Recognizing that management practices have impacts beyond park boundaries, SFRPD developed the Standards and Guidelines to adapt to and preserve local systems through sustainable design of open spaces and facilities, and maintenance procedures. These practices include the use of proven sustainable materials and technologies.



III.

OBJECTIVES & POLICIES

OBJECTIVE 1**ENSURE A WELL-MAINTAINED, HIGHLY UTILIZED, AND INTEGRATED OPEN SPACE SYSTEM**

The City's goal is to make the very most of the open space assets that San Francisco's robust system already provides. Well-maintained, highly utilized, and integrated open spaces are hallmarks of a unified and connected open space system with diverse programming, numerous amenities, and regular maintenance. Offering a diverse range of active and passive recreational opportunities in the City's current recreation and open spaces would help better utilize existing resources and encourage access for diverse users and activities.

POLICY 1.1**Encourage the dynamic and flexible use of existing open spaces and promote a variety of recreation and open space uses, where appropriate.**

San Francisco has a variety of high-quality open spaces, where diverse types of users can engage in a myriad of activities—children can play, seniors can linger on benches and socialize, people can exercise and enjoy nature, and families can gather for a picnic. San Francisco's open spaces vary in their form and function: from smaller local green streets, pocket parks, plazas, and community gardens; to neighborhood parks, playgrounds, sports fields, and recreation centers; to large regional-serving parks such as Golden Gate Park and special destinations such as Camp Mather. To ensure vibrant parks and open spaces the City should deploy a diverse range of opportunities, including the following options:

- Provide recreational opportunities, both active and passive, that respond to user demographics and emerging recreational needs.
- Include innovative community-driven uses such as food production, education, and improved streetscaping.
- Design open spaces that include both active programming and passive uses in tranquil spaces.
- Provide programming for healthy and active lifestyles.
- Add user amenities such as concessions that cater to and attract visitors.

- Expand opportunities for temporary uses such as festivals, art, performances, and farmers markets.
- Allow active engagement with natural areas through public access trails, wildlife observation, birding, and educational displays and programs.
- Increase cultural programming and activities based on neighborhood need and interest.
- Provide spaces and structures that encourage unstructured natural play.

Some of the City's open spaces and recreational facilities are underutilized and need additional programming and activation to address community interests and needs. These underutilized spaces offer a tremendous opportunity because the space is already owned and operated by the City. Such locations would in most cases require minimal renovation to take full advantage of the space. These open spaces and recreational facilities should be redesigned or re-programmed to better serve the needs of the surrounding neighborhood, while ensuring a flexible design to adapt to changing neighborhood needs over time. Some types of public spaces that have traditionally been overlooked can offer additional opportunities for innovative and community-driven strategies for activation – wide sidewalks and traffic medians can be considered for community gardens, and parking lots and other spaces can support temporary festivals and farmers markets. There also are events large and small, such as fairs, concerts, and sporting events, that occur annually or on a recurring basis in parks and open spaces throughout the City. These events are often well-attended and enjoyed by many residents and visitors. In some cases the draw of these events provides the first exposure for many people to the City's diverse parks and open spaces. The City should continue to evaluate how these events impact the open space itself and on the surrounding neighborhoods.

POLICY 1.2**Prioritize renovation in highly-utilized open spaces and recreational facilities and in high needs areas.**

Many of the City's open space and recreational facilities support a high intensity of uses. These spaces clearly provide a welcome respite for residents and visitors, but they are often so heavily utilized that more frequent maintenance is necessary to keep up with their heavy usage. The City should perform user studies and collect usage data to

assess which of the existing recreation and open spaces are the most highly used so that those spaces may be targeted for renovation and improvement. Renovation of resources also should be prioritized in “high needs areas,” defined as areas with high population densities, high concentrations of seniors and youth, and lower income populations, that are located outside of existing park service areas (See *Map 7: High Needs Areas: Priority Renovation & Acquisition Areas* and Policy 2.1).

POLICY 1.3

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

The shortage of vacant sites and the intensity of development in San Francisco produce pressures on the City’s public open spaces, sometimes putting spaces at risk of conversion to uses not serving the public purpose of respite and recreation. These same factors generate considerable public demand for access to open spaces. It is essential that the City protect its public open spaces from conversion to other uses, which threatens the overall integrity of the open space network.

Outdoor space in parks and playgrounds should not be diminished except in very unique cases. Yet, despite general agreement on the need to preserve public open space, developments may indeed be proposed on public land designated as open space. It is anticipated that the most persuasive arguments in favor of development will be based on the “public value” of the proposed development. The public value will differ among proposals, and a determination of this projected value as compared the potential open space benefit will be difficult and must be subject to rigorous public scrutiny. In order to assist in this determination when proposals for new development occur, the following provisions should be applied:

1. Proposals for Non-recreational Uses on Recreation and Park Department Land:

Decisions related to non-recreational uses on RPD land shall conform to the San Francisco Charter Section 4.113. The Charter requires a vote of the electors for park property to be sold or leased for non-recreational purposes or to build any structure for non-recreational purposes on park property. The Charter also notes that the Recreation and Parks Commission, with the approval of the Board of

Supervisors, may use subsurface space for parking or other uses that would not be detrimental to the original park purpose.

2. Proposals for Permanent New or Expanded Recreational and Cultural Buildings, and Supporting Facilities on Recreation and Park Department Land:

A properly balanced recreation system combines both indoor and outdoor spaces and programs. Indoor recreational facilities are as important as outdoor space in a well-integrated park system. New indoor recreation facilities may be necessary to respond to local community needs, changing demographics of many San Francisco neighborhoods, and shifting maintenance requirements. Additionally, amenities that serve users of recreational facilities and open spaces – such as bicycle rental stands, cafes, and kiosks – can help provide services that enable and attract more people to visit and use underutilized open spaces and spend more time there. Culture is also an important aspect of community recreation; cultural facilities such as libraries or community spaces can support and enhance the existing park system. Proposals for such facilities or uses should be carefully evaluated to ensure the proposed location is optimal and appropriate. Decision-making bodies should consider the following criteria in making their determinations on such proposals:

- Facility directly serves and improves the existing open space by supporting better utilization of space while continuing to provide public access and respond to the needs of the local community.
- Facility is limited in size. The size will vary by open space, but the size shall be limited to the smallest footprint appropriate and feasible for the proposed use, taking into account the intensity of use, expected participants and spectators, as well as other relevant factors.
- Facility incurs limited impacts on the existing open space (because of a preponderance of nearby outdoor open space or other factor), or the projected public benefits outweigh the impacts.
- A clear rationale exists for siting the facility, articulating the advantages of the proposed site compared to reasonable alternatives.

A loss of open space resulting from approval of the proposed facility generally should be offset with replacement open space of equal or higher quality. This new open

space can be provided through a variety of ways, such as the removal of existing non-utilized structures, the acquisition of new space, or rearrangement of existing recreational and open space uses to better integrate these uses and the proposed facility. Maintenance facilities, restrooms, and other park-supporting facilities owned and operated by the Recreation and Park Department that are necessary for the maintenance of parks are exempt from these requirements.

3. New and Expanded Facilities in Non-RPD Open Spaces:

Many of the City's current and potential open space sites are under the jurisdiction of public agencies other than the Recreation and Park Department ("RPD") - including the Port of San Francisco (the Port), the SFPUC, the Office of Community Investment & Infrastructure, and the Department of Public Works. These spaces include parkland, shoreline access, reservoirs, grounds of public institutions, streets, alleys, and undeveloped street rights-of-way, and are shown in *Map 3: Existing and Proposed Open Space*. In some cases, these non-RPD-owned sites are intended for public uses other than recreation and the site's role as open space is secondary to the primary use. Yet their role as open space is important, as they supplement playgrounds and parks and are a major visual asset.

New facilities related to that primary use, or expansions of various types of supporting facilities may be requested. These proposed facilities may be necessary to perform the public function of the particular land-owning agency. Decision-making bodies should analyze all of the following criteria in making their determinations on such proposals:

- Facility is necessary to provide the public service or operations of the agency holding the site in question.
- A clear rationale exists for siting the facility, articulating the advantages of the proposed site compared to reasonable alternatives.
- Facility incurs limited impacts on the existing open space (because of a preponderance of nearby outdoor open space or other factor), or the projected benefits outweigh the impacts.

Upon approval, the city may request the sponsoring agency to meet certain design criteria and performance standards that ensure conformity with the General Plan.

Removing non-recreational uses

In keeping with the overall policy goal of limiting encroachments, the City should also pursue eliminating non-recreational uses in its public open spaces. In the past, parks and playgrounds have been used as sites for public facilities such as fire and police stations, sewer plants and schools. Undoubtedly, the public need for them was great at the time of their construction and many are still essential. But as non-recreational facilities such as these require maintenance, the City is faced with the decision to renovate them or to relocate them altogether.

Where it is possible to provide services elsewhere, the City should demolish the facility so as to return the site to open space use. If the facility can be successfully converted to recreational use, then reuse could be an alternative to demolition. The City should not, however, permit the reuse of such facilities for other non-recreational purposes. The same policy should apply to the reuse of obsolete recreational facilities.

Temporary Structures

Temporary structures are often needed for different events, and in the case of natural disasters, our parks serve as temporary evacuation space. Therefore, all temporary structures (i.e. all structures that do not have in-ground footing attached to the structure) in compliance with the City's permit process are exempt from the above requirements. Use of such structures beyond their original intent, however, would be subject to the criteria explained earlier in this policy.

POLICY 1.4 Maintain and repair recreational facilities and open spaces to modern maintenance standards.

Maintaining open spaces and recreational facilities at a high level of quality will help ensure that they are well-utilized and enjoyed. In order to maintain this goal, the City should continue to employ well-trained staff, such as gardeners, arborists, electricians, plumbers and other tradespeople to maintain our open space system and recreational facilities.

However, maintaining the City's existing recreation and open space system in a good condition continues to be a challenge due to intensive use, facility age, and a high number of sites. The City has diminishing resources devoted to general maintenance and upkeep.

The city, especially for private and supplemental spaces, should continue to explore creative partnerships to meet maintenance goals of parks and open spaces. Where feasible and in keeping with the City's goal of providing well-maintained spaces the City should continue to seek alternative maintenance methods, such as working with non-profit stewards, or developing alternative maintenance agreements.

The Recreation and Parks Department owns a significant portion of the City's open space system. With over 220 parks and 3000 acres of parkland, RPD requires significant resources to keep the system in good to excellent condition. However, even as RPD continues to seek additional funding sources to address these needs, maintenance continues to be a problem due to rising costs and limitations on staffing and equipment.

RPD now evaluates parks on a quarterly basis and in addition the City Controller's Office provides an annual report on the state of the City's parks. The reports have helped direct RPD management and City resources to address maintenance needs. The City should continue to analyze maintenance needs by using these reports and other sources as data from users throughout the recreation and open space system to ensure the maintenance standards are met and funding is adequate.

POLICY 1.5

Prioritize the better utilization of McLaren Park, Ocean Beach, the Southeastern Waterfront and other underutilized significant open spaces.

Some of the City's large signature spaces offer a special opportunity to provide multifunctional open spaces that serve a diverse set of users. In particular:

McLaren Park

McLaren Park is a citywide resource due to its large size, varied landscape, and the specialized activities and programs located within the park. At the same time, it is located in an area of the City with one of the highest concentration of children, youth, seniors, and low-income households. McLaren Park should offer uses which satisfy the recreation needs of adjacent neighborhoods as well as meeting the needs of the city. The McLaren Park Master Plan was originally written in 1983, updated in 1996, and most recently updated with recommendations in the 2010

McLaren Park Needs Assessment. The City should ensure that the objectives and priorities of the Master Plan provide effective guidance for the needs of the park today.

Development of the park should capitalize on the site's natural conditions, including topography, existing native vegetation, and views, in compliance with RPD guidelines. New plantings should be added to provide habitats and windbreaks, to define sub-areas of the park, and to provide colorful and attractive visual accents. Plant species should be hardy, wind- and fire-resistant, and provide for and enhance wildlife habitats.

In an effort to increase park use, the City should continue promoting events that attract visitors to the Park. For example, Jerry Garcia Day, an annual festival held in honor of the local musician, draws thousands of visitors to the park. Revenues generated from such events could fund maintenance of and improvements to recreation facilities and open space.

The City should consider a number of improvements to McLaren Park. Existing traffic conditions should be examined to reduce conflicts between vehicles and park users. The City should investigate the feasibility of improving the existing right of way in the park to allow for safe pedestrian, vehicular and bike access where appropriate and converting those areas to recreational use. The existing trail system should be retained and improved by completing missing linkages. Any new development should build on the existing infrastructure including roads and parking areas, the irrigation system and drainage structures, and lighting and electrical installations. Infrastructure that is damaged should be replaced within the existing network, channel or path. New recreation areas should serve active, as well as passive, non-organized recreation needs, that respond to a wide spectrum of park users.

Ocean Beach

Ocean Beach offers a vast, unbroken expanse of natural open space that is one of the longest urban beaches in the country. The area historically served the growing San Francisco population with the Sutro Baths, the Cliff House, the Fleishhaker Pool, and an amusement park, but now suffers from erosion and a lack of amenities. At the same time, Ocean Beach is annually visited by as many as three million people for activities such as walking, picnicking, sunbathing, jogging, dog walking, surfing, fishing, and simply enjoying the natural beauty.

Ocean Beach faces significant obstacles to fulfilling its potential as a great public space at the city's edge. First, critical components of the wastewater infrastructure are located near the beach, with some elements that are threatened by erosion. Coastal management to protect infrastructure, ecological resources, and public access is a complex challenge. The erosion is likely to worsen as climate-related sea level rise accelerates. In addition, Ocean Beach is administered by a host of Federal, State, and Local agencies, including the National Park Service¹, the SF Recreation and Park Department, the San Francisco Public Utilities Commission, and the State Coastal Commission.

A non-binding Master Plan for Ocean Beach has been developed by a project team led by San Francisco Planning and Urban Research (SPUR) and incorporating input from an interagency Steering Committee, Planning Advisory Committee (PAC), Technical Advisors and the general public. The plan addresses the complex challenges faced at the coastline, including severe erosion, jurisdictional issues, a diverse array of beach users and points of view, and the looming challenge of climate-induced sea level rise. It presents recommendations for the coastline and how it should be managed and protected for the stretch from the Cliff House to Fort Funston, spanning roadway changes, bike and pedestrian connectivity, technical interventions, and ecological restoration.

Southeastern Waterfront/The Blue Greenway

The Blue Greenway is a project to improve and expand the public open space network along the City's central and southern waterfront from China Basin Channel to the San Francisco County Line. Collectively, the Blue Greenway is intended to provide opportunities for much-needed open space that is easily accessible for exercise and recreation, including bicycle and pedestrian access, recreational uses in the water, (e.g. kayaking), access to historical resources, and enjoyment of art as well as waterfront public access from nearby neighborhoods. The plan realizes objectives set forth in the Association of Bay Area Government's (ABAG) Bay Trail Plan and the Bay Area Water Trail Plan. High priority should be given to the project's completion as it will provide a much-needed open space system that is easily accessible for exercise, recreation and enjoyment of art and open space in the City's southern and central corridor. (See *Map 8: Blue Greenway* and Policy 2.4)

POLICY 1.6

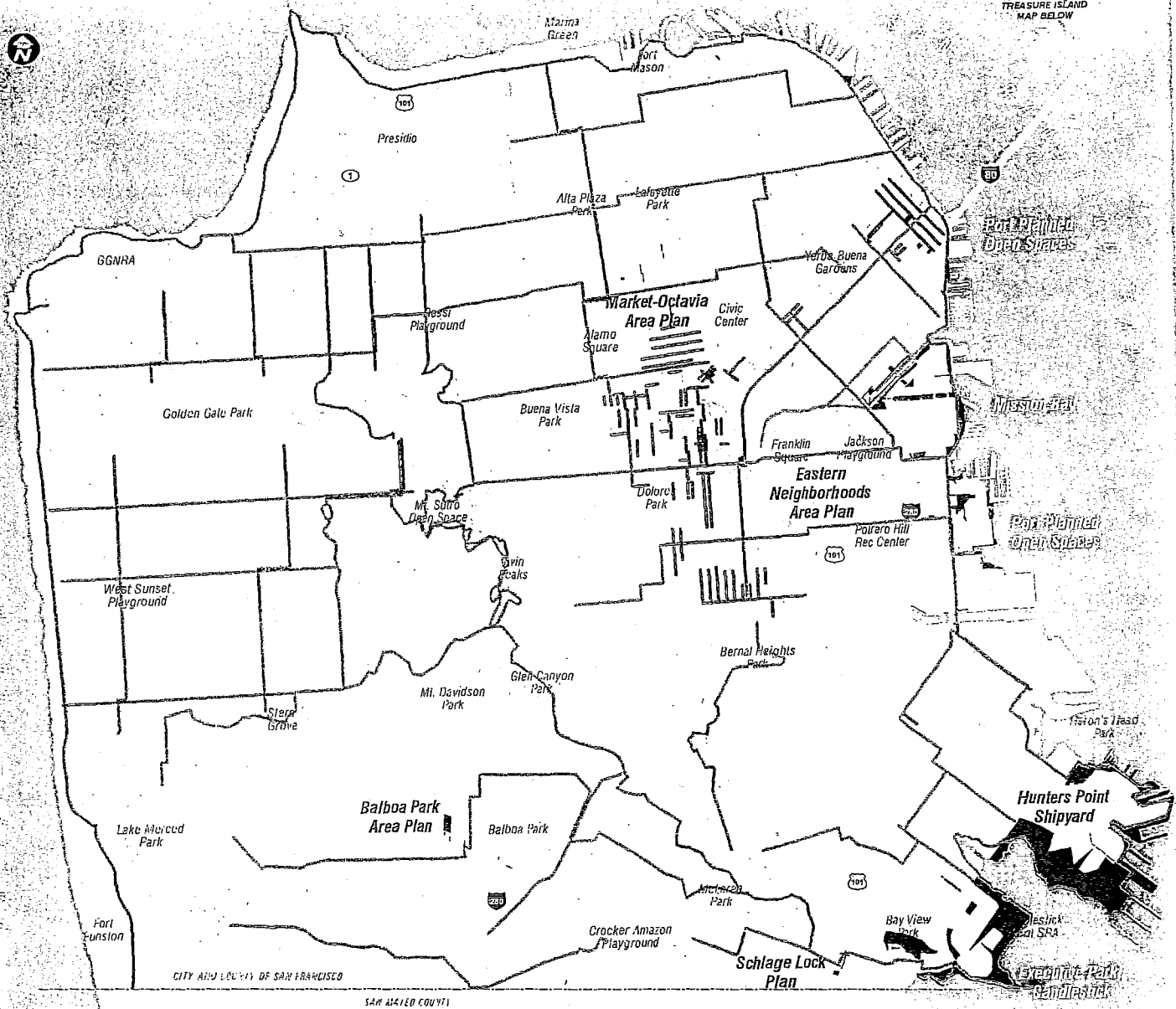
Support the continued improvement of Golden Gate Park while preserving the beauty of its landscape.

Golden Gate Park is San Francisco's largest and one of its most important parks, with over 1,000 acres of open space and an estimated number of users topping 13 million annually. The park offers immeasurable opportunities to meet the needs of neighborhood, citywide and regional residents, and visitors from national and international destinations. The landscape design and natural legacy of Golden Gate Park are some of the many features that draw people to this park, and they would benefit from additional investment in restoration efforts. Many recently renovated and new facilities in the park, including the Conservatory of Flowers, the DeYoung museum, and the new California Academy of Sciences, have made the park increasingly popular. After ten years of community input, the City completed a 1998 Master Plan, a comprehensive plan that laid out landscaping, circulation, recreation facilities, buildings and monuments, utilities and infrastructure, maintenance, as well as funding for this signature open space. This Master Plan provides guidelines for continued improvements. Going forward, major areas of focus should include:








1. **Assess the Master Plan:** Many of the proposals in the Plan have been completed, while some remain unfinished. Golden Gate Park is one of the City's most important resources and a detailed assessment of the Master Plan should be completed to determine if the goals for the Master Plan have been implemented. In the long-term, the City should work with the community to determine if this Master Plan should be updated.
2. **Improve pedestrian access to Golden Gate Park:** Current pedestrian access around and to Golden Gate Park is highly limited, with sidewalks entirely lacking along one side of Lincoln Avenue, and limited formal pedestrian access points into the park. The City should consider a long-term goal of improving pedestrian access into the park and along its edges and discouraging entering the park on improvised trail entrances, which harms the flora in the Park. In response to the Master Plan's recommendation for a comprehensive signage system, signage standards were developed and many new signs have been added to the Park.

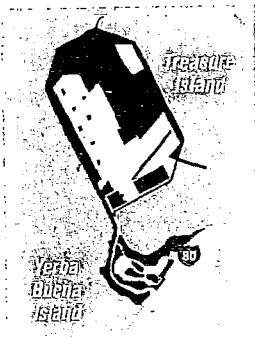
¹ Most of the beach is GGNRA property.

SEE
TREASURE ISLAND
MAP BELOW



Existing and Proposed Open Space

-  Potential Living Alleys
-  Potential Living Streets
-  Proposed Green Connections
-  Off Street Multi-Use Paths
-  Proposed Open Space
-  Existing Open Space
-  Acquire and develop sites for open space (Eastern Neighbors Area Plan)



0 1 Miles
MAP 03

3. **Discourage automobile traffic:** The increasing popularity of the Park has also brought an increase in users. The City should continue to pursue alternative transportation to and within the park and examine both incentives for alternative transportation and disincentives for automobile traffic. The City should study potential options for improving the pedestrian experience, including considering roadway improvements and redesign (such as the cross-park tunnel that is incorporated in the Doyle Drive project at the Presidio) to improve safety and enhance views.

POLICY 1.7

Support public art as an essential component of open space design.

Art plays a critical role in both activating spaces and indicating to passersby that the space is public. The public requirement for art, originally passed in 1969, established the importance of monumental art integrated within public projects. This ordinance, currently titled the Art for Enrichment program, requires two percent of the construction cost of civic projects, including buildings, transportation projects, and new parks to be spent on public art for civic projects.² In 1985, the Downtown Plan required certain private projects to spend one percent of the project's worth on the provision of public art. This requirement was expanded to other areas the city in a new Ordinance in 2012.³ In order to promote art in public and open spaces, the City should continue to evaluate the possibility of expanding this requirement to other areas in the City. These projects vary greatly in their style and substance, from murals to monuments, but they have in common the ability for the public to access them. When parks or open spaces are renovated or new spaces are built, public art should be placed where it's both visible and appropriate given the parkland or open space.

POLICY 1.8

Support urban agriculture and local food security through development of policies and programs that encourage food production throughout San Francisco.

The benefits of urban agriculture include increased access to healthy fresh food, a closer connection between residents and their food system, and opportunities for community-building and beautification. The growing movement to

increase urban agriculture should be supported on both public land and on private spaces where possible. Currently, a huge and unmet demand for more community garden space exists in the City. Urban gardens should be permitted and promoted in public open spaces. To promote this goal, the Mayor's 2009 Executive Directive on Healthy and Sustainable Food encourages food production within the City and requires departments to identify public land for food production. City practices should support the work of organizations promoting urban agriculture, and explore ways to increase their access in new housing developments, existing publicly managed housing developments, and other public lands. The City should continue to make it a priority to find additional public spaces to meet this need. The City's Administrative Code also calls for comprehensive programs, policies, and strategies to generally enhance and increase urban agriculture uses. The City should also incentivize creation of community agriculture on private sites, such as private yards and building rooftops. Activities that allow distribution of locally grown food, such as farmers markets, Community-Supported Agriculture (CSA) distribution sites, or even direct sales of local and large-scale urban agriculture, should be considered a valuable part of activating underutilized public and private open spaces.

POLICY 1.9

Preserve sunlight in public open spaces.

Solar access to public open space should be protected. In San Francisco, presence of the sun's warming rays is essential to enjoying open space. Climatic factors, including ambient temperature, humidity, and wind, generally combine to create a comfortable climate only when direct sunlight is present. Therefore, the shadows created by new development nearby can critically diminish the utility and comfort of the open space.

Shadows are particularly a problem in downtown districts and in neighborhoods immediately adjacent to the downtown core, where there is a limited amount of open space, where there is pressure for new development, and where zoning controls allow tall buildings. But the problem potentially exists wherever tall buildings near open space are permitted.

Properties under the jurisdiction of the Recreation and Park Department or designated for acquisition are protected by a voter-approved Planning Code amendment. It restricts

² For additional detail, See San Francisco Administrative Code, Section 3.19.

³ For additional detail, See San Francisco Planning Code, Section 4.29.

the construction of any structure exceeding forty feet in height that would cast a shadow that is adverse to the use of the park from between one hour after sunrise to one hour before sunset, unless it is determined that the impact on the use of the space would be insignificant. In determining whether a new shadow cast by a development is adverse to the use of a particular property, the City considers several quantitative and qualitative criteria, including the size of the park property, the amount of existing shadow, and the timing, size, location, and duration of the new shadow and the public good served by the building.

The City should support more specific protections elsewhere to maintain sunlight in these spaces during the hours of their most intensive use while balancing this with the need for new development to accommodate a growing population in the City.

POLICY 1.10

Ensure that open space is safe and secure for the City's entire population.

Safety and security in the City's open spaces is essential to allow San Franciscans to enjoy their community open spaces. Improving the design of an open space through design treatments can reduce the fear of crime and the actual level of crime. Design treatments can include:

- Providing clear sightlines, where appropriate.
- Designing the street/open space interface to encourage permeability and access.
- Ensuring adequate and appropriate lighting.
- Better utilizing parks and open space to increase park visitors and encourage "eyes on the park."

POLICY 1.11

Encourage private recreational facilities on private land that provide a community benefit, particularly to low and moderate-income residents

Outdoor space is not the only medium for physical activity. San Franciscans use indoor recreation spaces for activities like swimming, tennis, basketball, ping-pong, yoga, and general fitness and group classes. Private recreational sources, such as clubs and gyms, offer residents spaces to participate in such activities. In permitting new development, San Francisco should continue to encourage space for physical activity, including private recreational facilities in building projects to supplement those provided by the City.

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

For-profit recreational facilities can offer similar educational and recreational benefits, provided the participant can pay. Examples include country and tennis clubs, yoga studios, and private gyms. These facilities should receive support, based on the level at which they can demonstrate they are meeting underserved low and moderate income need. Such facilities should be encouraged to offer neighborhood discount or "community class" rates to improve access for community members that are not able to afford full rates. The City should also look for opportunities to partner with such private organizations, to provide benefits to the public at a lower cost.

POLICY 1.12

Preserve historic and culturally significant landscapes, sites, structures, buildings and objects.

Historic resources are an important element of our park system. The value of these resources should be preserved and celebrated because they provide an important link to the significant events, people, places or design that they represent.

POLICY 1.13

Preserve and protect character-defining features of historic resources in City parks, when it is necessary to make alterations to accommodate new needs or uses.

The City should identify, evaluate, and preserve historic and cultural resources in City parks. Prior to any project that involves the alteration or replacement of any of these resources, the City should conduct a comprehensive survey and analysis to identify resources and associated character-defining features within the vicinity of the proposed project. The removal of distinctive materials or alteration of

features, spaces, and spatial relationships that characterize the resource should generally be avoided. The replacement of historic and cultural resources and features should be avoided if possible.

OBJECTIVE 2

INCREASE RECREATION AND OPEN SPACE TO MEET THE LONG-TERM NEEDS OF THE CITY AND BAY REGION

In an urban area, the most critical factor in the provision of open space is its distribution. All types of open space activity - from sports fields to playgrounds - should be accessible to and within walking distance of every resident of the City. Walking distance, however, ranges depending on the type of activity and the resident. A half mile is commonly accepted as a distance that can be comfortably walked in 10 minutes, and as a distance most people are willing to walk to access community uses.⁴ For most recreational activities, including active ones such as hiking, biking and sports activities; or for passive ones, like picnicking, this walking distance is acceptable. However, for activities that involve small children, such as a playground, one-quarter mile (a five minute walk) is more appropriate. Using these walking distances, and taking into account topography and other barriers, the City's open space is generally well distributed, as illustrated in *Map 4: Walkability*.

However, some parts of the City are still deficient in certain types of open space. The eastern side of the City has a lack of large open spaces. While certain areas are planned and zoned for Production, Distribution, and repair (PDR) uses and for maritime industries, other areas were recently rezoned to support additional residential development. The future population increase in these areas and throughout the City (See *Map 6: Areas of Potential Additional Population Growth, 2040*) will exacerbate current open space deficiencies.

Many parts of the City also lack playground space. Sports fields are well-distributed; however, capacity is limited and the demand for their use is often greater than what can be provided in neighborhood spaces.

Even in neighborhoods that have open spaces within walking distance, higher density and lower income populations may mean demand in these areas exceeds the capacity of local open spaces. As these communities continue to grow, open space improvements and acquisition are needed to maintain access to this limited resource. This objective, and the policies that follow, are aimed at addressing these deficiencies through new or improved open space provision.

POLICY 2.1

Prioritize acquisition of open space in high needs areas.

Throughout the country, safe, green open spaces are in short supply in dense communities, where low-income and minority populations tend to be concentrated, as well as large numbers of children and seniors. In the more densely populated, older areas of San Francisco, people often have less mobility and fewer financial resources to seek recreation outside of their neighborhood. People in less dense parts of the City may enjoy use of private yards and patios, while residents in denser neighborhoods may not have that option. Finally, studies have found that the need for a park as a restorative "oasis" is most critical in dense urban areas.

Priority for acquisition of new space to address open space inequities should be given to high need areas, defined as places where there is low access to open space (illustrated in *Map 4: Walkability*), a conglomeration of high density, high percentages of children, youth, seniors, and low income households (illustrated in *Map 5: Population Density, Household income, Concentration of Children and Youth, Concentration of Seniors*), and in which the most growth is projected to occur between now and 2040 (illustrated in *Map 6: Areas of Potential Additional Population Growth, 2040*).⁵ Future areas with adopted master plans or Redevelopment plans, such as Mission Bay, Park Merced, Hunters Point Shipyard/ Candlestick, and Treasure Island (See *Map 4D: Walkability: Proposed Open Spaces in Large Plan Areas*) have identified site specific open spaces and recreational facilities, along with funding and implementation strategies for those parks and recreation facilities. These proposed site-specific parks and open spaces would support the planned population growth and therefore these proposed parks are incorporated into the

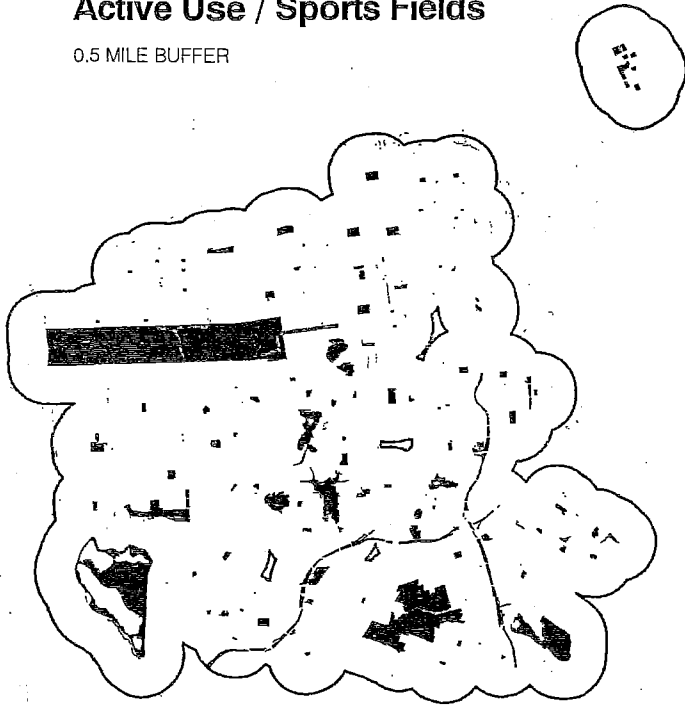
⁴ Regional Plan Association (1997) Building Transit-Friendly Communities A Design and Development Strategy

⁵ The Planning Department Land Use Allocation distributes projected housing and employment growth as determined by the Association of Bay Area Governments to 981 Traffic Analysis Zones (TAZ). These zones vary in size, from a block around downtown to several blocks in more outlying areas. The allocation of TAZ-specific growth is based on the current development pipeline (development projects under construction, approved or under review) and an estimate of additional development potential for each TAZ.

MAP 4A

**Walkability:
Active Use / Sports Fields**

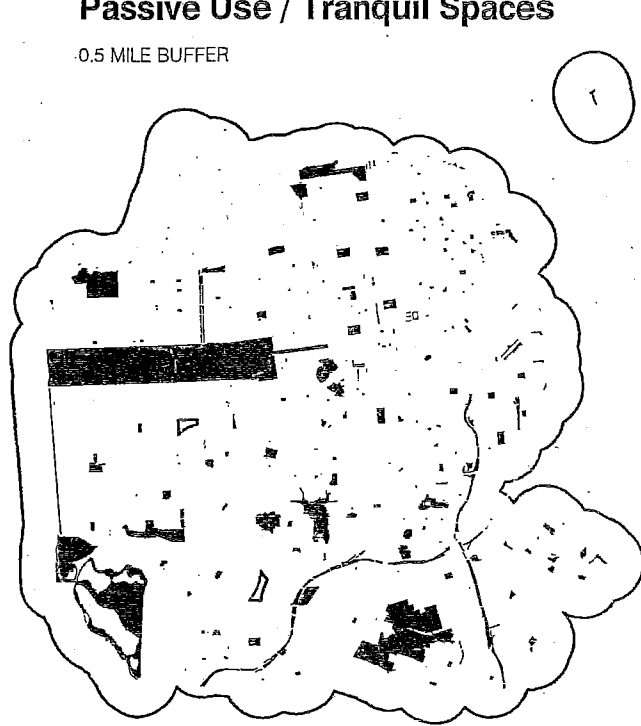
0.5 MILE BUFFER



MAP 4B

**Walkability:
Passive Use / Tranquil Spaces**

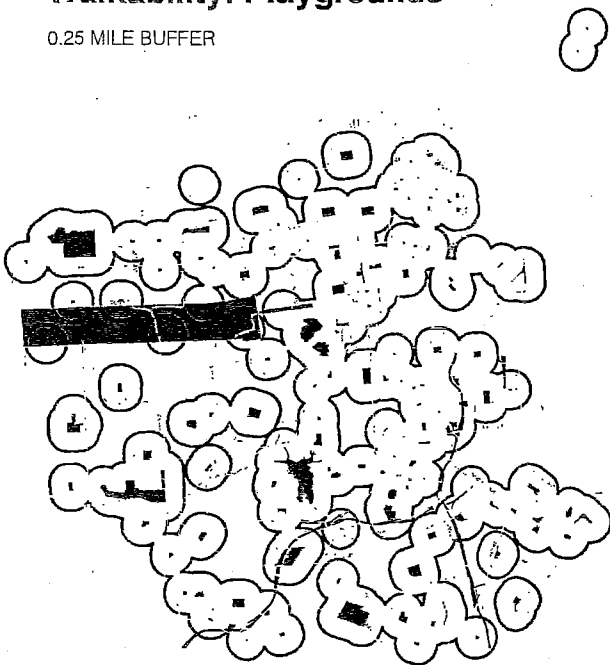
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MAP 4C

Walkability: Playgrounds

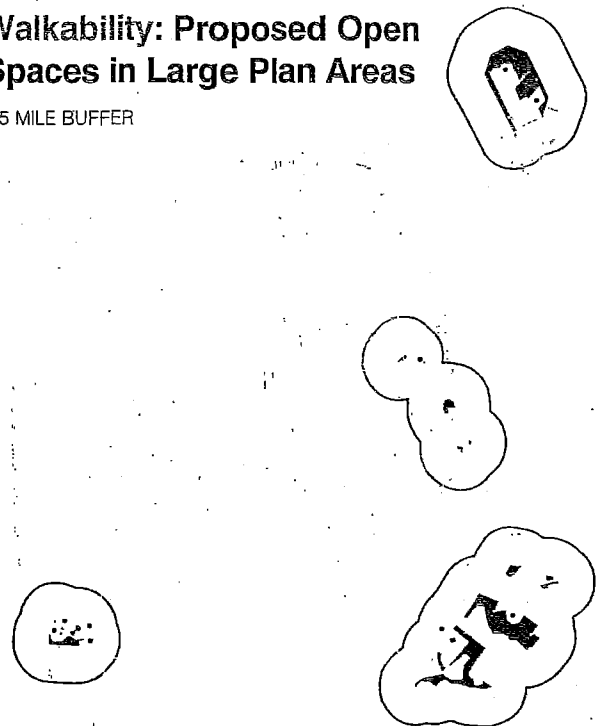
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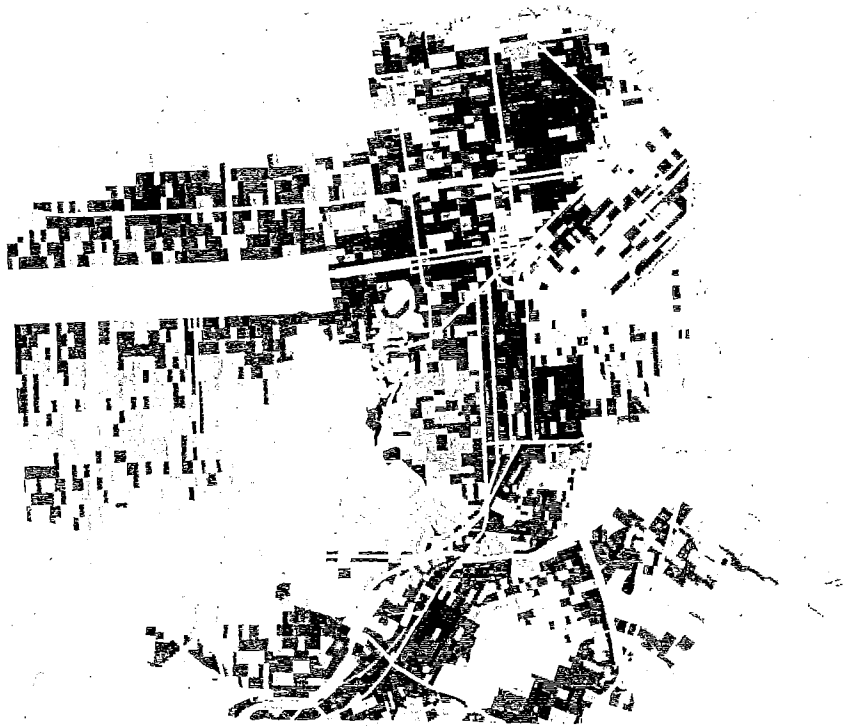


MAP 4D

**Walkability: Proposed Open
Spaces in Large Plan Areas**

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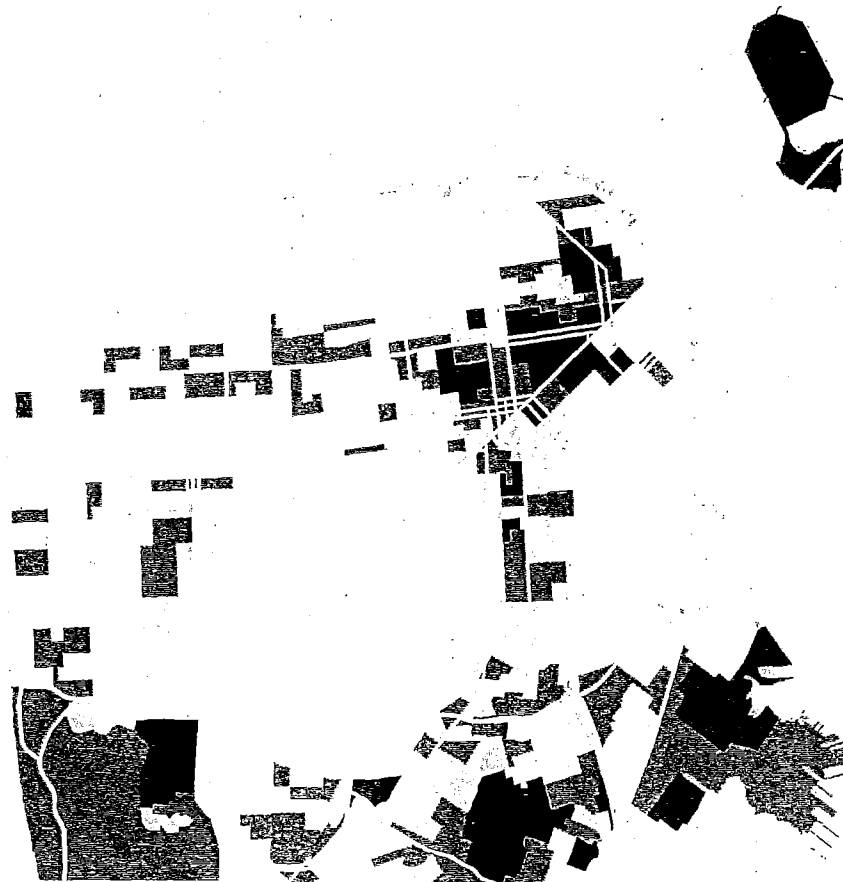
MAP 5A

Population Density

People Per Acre

- 0 - 23,722
- 23,732 - 38,153
- 38,158 - 54,267
- 54,268 - 875,893

*Median Population Density Per Block Group:
38,158 Persons Per Acre
(Source 2010 Census)*



MAP 5B

Household Income

Household Median Income

- More than 120% of SF HMI
More than \$93,625
- 80% - 120% of SF HMI
\$62,632 - \$93,333
- 50% - 80% of SF HMI
\$40,375 - \$62,273
- Less than 50% of SF HMI
Less than \$38,409

*Median Household Income (HMI) for San Francisco
Block Groups: \$77,845
(Source: 2007-2011 American Community Survey)*



MAP 5C

**Children & Youth
(0-17)**

Children & Youth (0-17) Per Acre

- 0 - 3.230
- 3.232 - 5.188
- 5.189 - 7.699
- 7.700 - 105.107

*Median Youth Density Per Block:
5.188 Youth Per Acre
(Source: 2010 Census)*



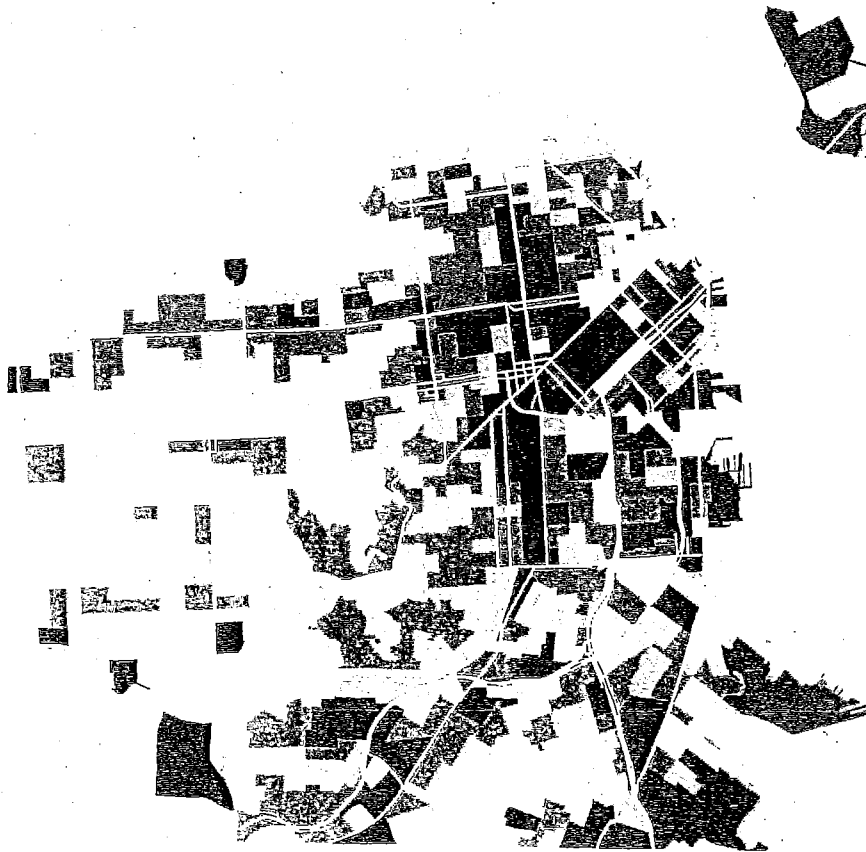
MAP 5D

**Seniors
(65 and over)**

Seniors (>64) Per Acre

- 0 - 2.818
- 2.822 - 4.599
- 4.600 - 7.219
- 7.220 - 2,471.195

*Median Seniors Density Per Block:
4.599 Seniors Per Acre
(Source: 2010 Census)*



MAP 06

Areas of Potential Additional Population Growth (2040)

Potential New People by 2040

- 0 - 33.41
- 33.93 - 81.85
- 82.22 - 200.46
- 201.46 - 8,943.86

*Difference between 2010 population and projected 2040 population by Transportation Analysis Zone (TAZ)
(Source: San Francisco Planning Department Land Use Allocation Analysis 2013)*



MAP 07

High Needs Areas: Priority Acquisition & Renovation Areas

- Greater Need
- Lesser Need

analysis as existing park spaces. Layering all of these factors results in *Map 7: High Needs Areas: Priority Acquisition & Renovation Areas*. This map and analysis should be updated periodically using updated decennial US Census data.

Recreation and Parks Department maintains an Acquisition Policy, as required by the City Charter (Section 16.107) and the Park Code (Section 13.02), aimed at facilitating acquisition of open space in high needs areas. The Acquisition Policy provides guidance to promote equitable recreational and open space opportunities through several criteria: location in High Needs Areas, available funding sources that may be leveraged, inter-jurisdictional cooperation, and community support. In order to maintain new acquisitions, the policy also acknowledges the need to identify and leverage resources for continued maintenance and operational support.

New acquisitions should continue to consider the composition of current and projected neighborhood populations. There are both demographic and cultural differences in how people use parks: preschoolers, school age children, teenagers, adults, and senior citizens have distinct open space needs that should be accommodated, that may also vary according to social and economic groups. Design of new spaces should rely on the specific needs and values of its user communities, by using a participatory community design process.

While open space acquisition should not be limited by the City's inability to maintain additional parkland, the City should recognize that acquisition will require an on-going commitment of additional resources for maintenance. In appropriate cases, the City should acquire the property and develop low cost maintenance techniques and programs for open space that are not used for intensive recreation, or should hold the land vacant until development and maintenance funds are available.

POLICY 2.2

Provide and promote a balanced recreation system which offers a variety of high quality recreational opportunities for all San Franciscans.

The City's goal is to ensure that all San Franciscans are within a reasonable walk from an open space with a range of active and passive recreational opportunities. To ensure the highest quality of recreational opportunities for its residents, the City must be able to respond to changing demographics, neighborhood demand, and emerging

recreational trends as it plans for new or expanded recreation and open space. The recreation system should provide an equitable distribution of facilities and services and consistent hours of operation. It should also provide sufficient opportunities for populations who are frequent users of open space, such as seniors and children.

POLICY 2.3

Provide recreational programs that are responsive to community needs and changing demographics.

In 2010, SFRPD implemented a new recreation system that focuses on flexibility and responsiveness to changes within communities by providing appropriate programming based on community interest and demand. To stay up-to-date with current needs and interests, RPD routinely surveys their recreation program users. The results provide RPD with information to ensure that programs and services meet the existing needs of neighborhood residents and are on the cutting edge of emerging trends.

RPD also works with the Department of Children, Youth, and Their Families (DCYF) on their Community Needs Assessment, conducted every two years. RPD participates in the assessment as a service provider, and relies on this report to update its recreation programming in coordination with other surveys and assessments. RPD and the City should continue to provide innovative recreational programs that respond to changing community needs.

POLICY 2.4

Support the development of signature public open spaces along the shoreline.

The Pacific Ocean, San Francisco Bay, and their respective shorelines are important natural resources in San Francisco. They offer opportunities for water-oriented recreation, passive recreation, views, and habitat. Most of the property adjacent to the thirty-two mile shoreline is in under public ownership. Maintaining public access to the waterfront is integral to San Francisco's identity and creating continuous open spaces along the ocean and bay is one of the City's long-term goals. Much of the waterfront is already accessible to the public, through parks ranging from Fort Funston, Ocean Beach, the Presidio and Fort Mason to the urban waterfront of the Embarcadero, and numerous open spaces along the Piers to Candlestick Point State Recreation Area.

These open space opportunities should be enhanced and expanded by focusing on the development of several signature open spaces that draw people from their immediate neighborhoods and beyond. Key focus opportunities for developing new or enhanced signature open spaces on the waterfront are listed below by geographic area, and are identified in *Map 8: Blue Greenway*. Additionally, connecting these open spaces to the surrounding neighborhoods and throughout the City and region is an important goal and is discussed further in Policy 3.2.

Northeastern Shoreline

Significant progress has been made in opening and improving the city's northern shorelines. With the opening of Crissy Field in the Golden Gate National Recreation Area and the retention of much of the open space in the Presidio as publicly-accessible open space, this area has transformed itself into a regional destination. Long-term, maximizing the recreational opportunities of other shoreline areas should be considered and inter-governmental and other partnerships should be pursued to further develop these opportunities.

In addition, a major opportunity exists to create an expanded, multi-park open space at the juncture of Market Street and the Embarcadero. The existing open spaces of Embarcadero Promenade, Justin Herman Plaza, and Sue Bierman (formerly Ferry) Park provide a wealth of untapped opportunity, which can be connected to function as a coherent link from downtown to the Ferry Building and the waterfront, holding several linked yet distinct activity and recreation spaces. Additionally, the Port is planning to open the Northeast Wharf at Pier 27, which would be a three acre plaza at the base of Telegraph Hill, and a series of linked open spaces in the heart of Fisherman's Wharf.

Western Shoreline

The western shoreline has the advantage that it is already a long-stretch of natural and publicly-accessible open space. Ocean Beach is a national treasure and should be improved to acknowledge the significance of vast, unbroken expanse of beach in the City.

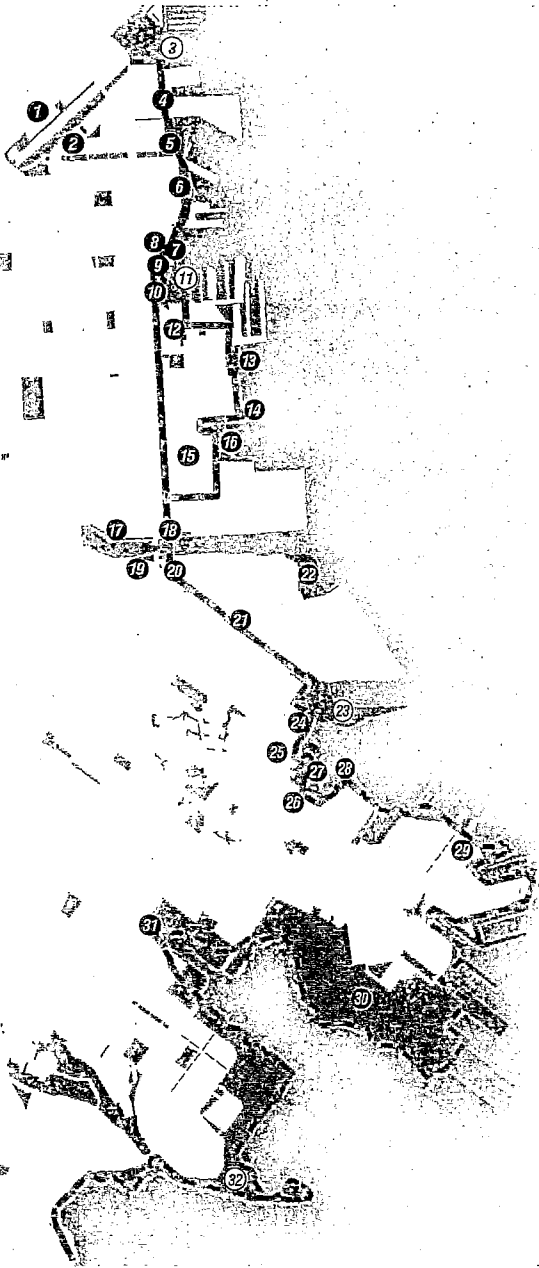
A non-binding Ocean Beach Master Plan has been developed by SPUR (a San Francisco non-profit supporting planning and good government in the Bay Area) in close coordination with responsible agencies. The Plan includes recommendations to improve and restore conditions at Ocean Beach by adapting proactively to the changing coastline. The western shoreline also connects to Lake Merced, providing opportunities for enhanced access to the waterfront and recreational opportunities. The SFPUC is currently exploring ways to improve access to the watershed lands in this area. If additional space becomes available, this space should provide improved connections from the neighborhood to the waterfront.

Southeastern Waterfront

The recent development of Mission Bay, the passage of the Eastern Neighborhoods plans (Mission, East SoMa, and Showplace Square/Potrero Hill, and Central Waterfront Area Plans), the India Basin Shoreline Plan, and the proposed Candlestick Point and Hunters Point Shipyard developments will bring growth, which will require increased access and open spaces throughout the Southeast. Most of these plans are accompanied by specific open space strategies for parkland along the waterfront, where active water-oriented uses such as shoreline fishing, swimming, and boating should be promoted.

Blue Greenway

The Blue Greenway is a project to improve and expand the public open space network along the City's central and southern waterfront, from the China Basin Channel to the San Francisco County Line (see *Map 8: Blue Greenway*). It provides a new vision of how parks and public spaces can be created to complement and connect with existing open spaces in this industrial mixed-use area along the Bay waterfront. The Blue Greenway seeks to both provide opportunities for much-needed open space that is easily accessible for exercise and recreation, including bicycle and pedestrian access, recreational uses in the water (e.g. kayaking), access to historical resources, and enjoyment of art, as well as improve waterfront public access from nearby neighborhoods. These goals realize objectives set forth in the Association of Bay Area Governments (ABAG) San Francisco Bay Trail Plan and Bay Area Water Trail for southeast San Francisco,



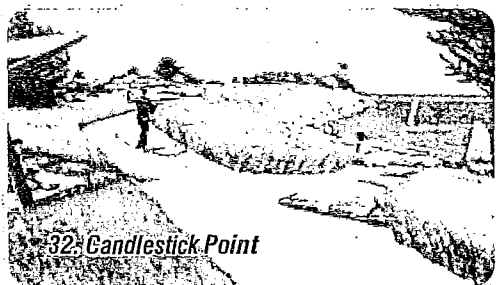
3. China Basin



11. Crane Cove Park



23. Heron's Head Park



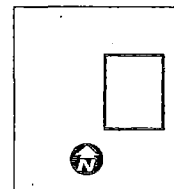
32. Candlestick Point

Blue Greenway

- | | | |
|------------------------------------|--|---|
| 1 Mission Creek Shoreline North | 12 Pier 70 Upland Open Spaces | 23 Heron's Head Park |
| 2 Mission Creek Shoreline South | 13 Pier 70 Slipways Park | 24 PG&E Shoreline |
| 3 China Basin Park | 14 Power Plant Shoreline Access | 25 Jennings St/Hunters Point Blvd/Innes Ave |
| 4 Terry Francois Blvd Improvements | 15 24th Street Improvements | 26 Hudson Avenue Right-Of-Way Improvements |
| 5 Pier 52 Boat Launch | 16 Warm Water Cove Park | 27 India Basin Shoreline Park |
| 6 Bayfront Park | 17 Islais Creek North-West | 28 India Basin Open Space |
| 7 Agua Vista Park | 18 Tulare Park/Islais Creek North-East | 29 Hunters Point Shipyard Open Spaces North |
| 8 Mission Bay Parks 23 & 24 | 19 Islais Landing/Islais Creek South | 30 Hunters Point Shipyard Open Spaces South |
| 9 Pier 64 Shoreline Access | 20 Third and Cargo Gateway | 31 Yosemite Slough Wetland |
| 10 Illinois Street | 21 Cargo Way | 32 Candlestick Point State Recreation Area |
| 11 Pier 70 Crane Cove Park | 22 Pier 94 Wetlands | |



MAP 08



The following Blue Greenway projects should be given high priority as the neighborhoods along the Bay waterfront – which are already deficient in open space – continue to grow in population. These projects correspond with identified high needs areas. Some are longer-term, large-scale projects that will require public funding:

▪ **China Basin Shoreline Park:** This existing approximately two-acre park will be expanded as a part of the development of the Port's Sea Wall Lot 337 project and will be the northern gateway of the Blue Greenway.

▪ **Mission Bay Park System:** This 41-acre park system will include a large scale, bayfront park between the China Basin Shoreline Park and Pier 70, with an important Blue Greenway segment. These open space opportunities and projects are incorporated into the Office of Community Investment and Infrastructure's Mission Bay Redevelopment project.

▪ **Pier 70 Open Space System:** the Port's Pier 70 Plan proposes the following open spaces along the Blue Greenway:

- *Crane Cove Park:* Plans for this approximately nine-acre shoreline park within the Port's Pier 70 development area include construction of an aquatic center and opportunities for park designs and interpretative materials that provide educational information on the City's deeply rooted maritime history. In addition to Crane Cove Park, the Pier 70 site presents opportunities for a variety of other open spaces, all of which must be consistent with the industrial maritime character and setting of the site.

- *Waterfront Development Site / Slipways Park:* The waterfront development site is an approximately 28-acre site that is slated for mixed-use development. The site includes Slipways Park, an approximately four-acre park along the southeastern shoreline that will incorporate historic shipbuilding infrastructure. The park will eventually connect with new shoreline open spaces once the former Potrero Power Plant site is redeveloped. Adjacent to the waterfront development site is the Irish Hill / Hoe-Down Yard property at Illinois and 22nd Street, which is jointly owned by the Port and PG&E. This area is also being evaluated for development and open space potential as part of the waterfront development site planning process.

- *Power Plant Site:* This approximately 23-acre parcel is the former site of the Potrero Power Plant. The privately owned site has substantial redevelopment potential and will be coordinated with the adjacent Pier 70 planning process, as it provides an opportunity to extend waterfront access through the pier to Warm Water Cove.

▪ **Warm Water Cove:** This isolated park has the opportunity to be improved and expanded by up to three acres to provide access to the City's Eastern shoreline and to provide recreational opportunities to the growing population.

▪ **Islais Creek Improvements:** This project may consist of shoreline improvements, including rebuilding dilapidated wharves, removing ghost piles, and providing for open space system linkages to expand public access and recreational water use of Islais Creek.

▪ **India Basin:** The recently closed Hunters Point Power Plant and adjacent shoreline properties offers the opportunity to bring much-needed recreational space to the center of the City's southeast neighborhoods, helping address the health and environmental impacts of the plant's operations.

▪ **The former Hunters Point Shipyard, Candlestick Park and Candlestick State Recreation Area:** These areas form the southern terminus of the Blue Greenway. These open space opportunities and projects are incorporated into the Office of Community Investment and Infrastructure's Candlestick and Hunters Point Shipyard redevelopment project.

The City, including the SFRPD, the Port of San Francisco, and Office of Community Investment and Infrastructure, should continue ongoing planning efforts to improve connections and address any gaps amongst the various waterfront open spaces to create a linked system of parks that is consistent with the Blue Greenway planning efforts. In addition to signature open spaces, the City should consider new waterfront open space improvements that serve a non-recreational purpose, including climate change adaptive infrastructure. Current projections by the Pacific Institute predict that global warming may cause the ocean to rise as much as five and a half feet along California's coastline in the next 100 years, impacting many areas of the San Francisco Bay, including the shoreline areas, much of Mission Bay and adjacent portions of SoMa.

Inclusion and restoration of open space, particularly tidal wetlands, can act as a natural buffer and play a key role in adapting to sea level rise. Wetlands can protect shorelines from storm surges while assisting in reducing carbon levels through sequestration, so wetland restoration and habitat enhancements should be considered for inclusion in all waterfront open spaces. While many of these areas are already developed, and therefore not appropriate for open space development at this time, ecosystem-based management principles and retrofits should be considered wherever possible to ensure that shoreline retreat and flood protection are considered as measures to assist in adapting to projected sea level rise.

POLICY 2.5

Encourage the development of region-serving open spaces in opportunity areas: Treasure Island, Yerba Buena Island, Candlestick and Hunters Point Shipyard.

Several large, underutilized sites within the City offer not only the opportunity for new mixed use development to meet the City's housing needs, but the chance to create new, large scale region-serving open spaces.

- **Treasure Island**, the former naval base just off the City's northeastern shoreline, is planned to reserve over 60% of its land area for open uses, ranging from parks and ball fields, to organic farms, to wetlands and tidal marsh. Combined with open spaces on contiguous **Yerba Buena Island**, its 290 acres of proposed open space will be planted with a diverse and healthy range of plants which will help offset the city's greenhouse gas emissions. As a part of the planning for the redevelopment of Treasure Island, a Habitat Management Plan was prepared to assure the protection and restoration of wildlife habitat and biodiversity on the adjacent Yerba Buena Island. It is critical that the final designs of open space on these two islands, taken together, provide not only a range of playgrounds and recreational areas to meet the new residents' activity needs, but also offer strong, permanent protections for their wetlands and natural habitat. Agriculture and biodiversity components of this Management Plan should be developed to serve as educational and cultural amenities for the City and the region.
- **Hunters Point Shipyard and Candlestick Point** are currently undergoing a transformation into a vibrant, urban neighborhood and livable green community.

Candlestick Point currently consists of the 49ers stadium, parking lot and the Candlestick Point State Recreation Area, of which only about half is improved. Hunters Point Shipyard consists of a decommissioned Naval Shipyard currently undergoing remediation with very limited public access. Plans for the two areas call for a well-connected, full breadth of complimentary uses. A major feature of the project is the robust open space program including upwards of 325 acres of open space, roughly 220 acres of which is being developed at the Hunters Point Shipyard. While the plans call for some reconfiguration of the existing Candlestick Point State Recreation Area (CPSRA) as provided for by SB 792, the reconfiguration will help assure the full realization of currently underutilized portions of the State park. The waterfront open spaces within this project will be the southern section of the Blue Greenway.

Taken together, the new open spaces will enable a continuous Bay Trail along this southeastern portion of the City, and provide a wide range of shoreline-oriented recreational opportunities that could include boat launches, fishing piers, restored wetlands, picnic areas, and food services. The new open space system should be designed in coordination with the proposed adjacent new urban neighborhoods and improve connectivity to the Bayview community, greater San Francisco, and the rest of the region.

POLICY 2.6

Support the development of civic-serving open spaces.

San Francisco is a civic city—celebrations, rallies, gatherings and protests take place almost weekly; political speeches, music, performances in the open air are also common occurrences. Our identity is defined as much by expressions of our social and cultural goals as it is by our physical landscape. These regular events in San Francisco emphasize the role of our City as a regional stage where like minds can gather and deliberate.

San Francisco needs civic spaces which can accommodate these activities – weekly events like farmer's markets, annual events such as the Pride Celebration, and special events such as broadcasting presidential inaugurations. As the City grows, these spaces need to accommodate ever-larger crowds of people and different types of functions – from simple gatherings to technical showcases and wired events.

The main opportunities to unify and bolster City landmarks and activity centers are focused around three major open spaces:

- **Civic Center:** Our existing Civic Center, surrounded by City Hall, the Main Library, the Asian Art Museum, and other civic spaces, hosts many of the activities described above. The Civic Center is part of the Civic Center Historic District with National, State, and Local designations. Civic Center's design, however, limits its capacity and functionality, with activities often spilling into less optimal public spaces such as nearby streets. The nearby UN Plaza provides additional activity space that is used for weekly farmers and craft markets, but the two spaces are generally underused outside of scheduled activities and are separated by a virtual parking lot along Fulton Street between Hyde and Larkin Streets. A series of connected open spaces, along a "Civic Center axis" from Market Street to City Hall, could be created with the development of a pedestrian mall along Fulton Street between the Main Library and Asian Art Museum, and with corresponding activity improvements to increase the usability of the Civic Center and UN Plazas. Some components that should be included in the revamping of these public spaces include an event lawn or amphitheater for performances, a gathering plaza, and pavilions for special events.
- **Embarcadero Open Spaces:** At the other end of Market Street, the numerous yet underutilized open spaces along the Embarcadero – Embarcadero Plaza, Justin Herman Plaza, and Sue Bierman Park – offer a glaring opportunity for synthesis into the City's gateway civic open space. Inspiration can be found in Millennium and Grant Parks in Chicago. Just as they serve as Chicago's front door, San Francisco needs a civic space for large outdoor events – a place where arrivals can be greeted by the vibrancy of the City, and where its citizens can gather for moments of great joy or great mourning. A series of linked outdoor "rooms" would enable the reconnection of Market Street to the Ferry Building, enhance visual connections to the Bay, activate public space edges with uses that draw people to inhabit and use the space, and create a series of distinct activity spaces for civic and news events, large gatherings, and performance space.
- **Market Street:** Market Street, San Francisco's premier street and most important destination, is more than the city's primary corridor for Downtown movement; it also acts as a civic and cultural center where people can gather to see, learn and participate in our city's vibrant life. The

Better Market Street initiative is currently underway to enhance public life along Market Street with a memorable and active identity; more diverse range of social, cultural, and economic activities; and with more gathering spaces to visit, promenade and linger. These changes will complement the transit and bicycling improvements that are also an integral part of Better Market Street

- **Hallidie Plaza:** Hallidie Plaza is a prominent San Francisco public space. Many more people visit Hallidie Plaza every day than any other plaza in San Francisco because of its proximity to shopping, hotels, and theatres. Despite these attractive qualities, Hallidie Plaza has never met its potential to be a world-renowned space where residents and visitors alike come to meet. The multi-level design fractures the plaza, making it impossible to create a place at street-level that can accommodate any sort of meeting space. The Better Market Street Project included preliminary designs for Hallidie to suggest different directions the City could go. Further, there were several conceptual designs developed in the early 2000s that highlighted preferred elements for the plaza, but no definitive design. These should be used as the basis for a design competition, hosted by the Planning Department.

Given the financial constraints San Francisco will continue to experience for the foreseeable future and the anticipated cost of fixing Hallidie Plaza, there will need to be a public-private partnership that brings philanthropic funding to match City contributions. Building the partnerships necessary to support the refurbishment of Hallidie Plaza should remain a high priority for the City so that the space can become a destination with iconic value to both San Franciscans and our many national and international visitors.

POLICY 2.7

Expand partnerships among open space agencies, transit agencies, private sector and nonprofit institutions to acquire, develop and/or manage existing open spaces.

Public agencies and private organizations and individuals are working to maintain open space in the Bay Area. These bodies include the Federal Government, the State of California, local governments, several sub-regional open space agencies, as well as public nonprofit organizations and private landholders. Preserving a regional open space system is beyond the scope of the seventy-odd local governments in the nine-county Bay Area. Valuable open spaces cross

city and county lines and individual municipalities have neither the regulatory powers nor the funds to retain them. Preservation of such spaces will depend upon regional action.

The City should facilitate efforts of existing agencies and organizations working toward regional open space goals. The City should encourage and work with these groups to secure additional land for open space retention and management, and to maintain existing open space areas in their current undeveloped open space status. The City should also support use of selected areas of open space lands within its jurisdiction for appropriate recreational uses.

POLICY 2.8

Consider repurposing underutilized City-owned properties as open space and recreational facilities.

All major metropolitan areas face challenges in providing sufficient open space due to lack of available land. While vacant or underutilized sites may be found, they are in high demand for private commercial or residential development, driving competitive land prices which are often too expensive for public acquisition. In order to meet the City's need for new open spaces in these high needs areas, the City should creatively look at the resources it already has – sites already in public ownership.

Surplus Sites: Occasionally public agencies find some land surplus to their current and projected needs. When public land becomes surplus to one public use, San Francisco's Surplus Property Ordinance, passed in May 2004, requires the city's surplus property be considered for affordable housing. Some such parcels are not feasible for housing because of their size or shape. When surplus land is already zoned for open space, open space should take priority over other public uses, including housing. When other surplus land becomes available for review as open space, the City should evaluate its suitability as a park site based on suitability criteria described in Policy 2.1 and in RPD's Acquisition Policy while considering other public benefits the land could provide. If the analysis finds the property necessary for open space usage, the City should consider if and how to transfer the property to the Recreation and Park Department under the procedures determined in SFRPD's Acquisition Policy for jurisdictional transfers.

Publicly Owned Sites: The City should evaluate all publicly-owned sites in high needs areas (see summary

Map 7: High Needs Areas: Priority Renovation & Acquisition Areas) to determine their feasibility for full or partial park site usage. Some of these sites may be underutilized and therefore available for purchase or swap—these should be reviewed for potential transfer to or purchase by RPD. Other sites may be currently utilized for valuable public purposes, but could offer opportunities for joint use. For example, public parking lots that are underutilized on weekends could serve as active recreational spaces during off-business hours, and could even be improved with reinforced-turf systems that create greened parking areas. Public buildings could be evaluated for their potential to provide active roof space, which could be creatively developed as green spaces accessible to the public during certain hours.

The opportunity to create open spaces on neglected or overlooked city owned parcels should be explored, particularly in high needs areas – such designs could repurpose existing infrastructure in unique and exciting ways. For example, the award-winning Gas Works Park in Seattle is built on a former coal plant site. More recently in New York City, an abandoned elevated rail track was redesigned as the High Line park, a wildly successful public space that drew over two million visitors in its first year and earned several design excellence awards. The City should consider the innovative reuse of abandoned, vacant or excess city owned land of all shapes and sizes.

Public Rights Of Way: As described in Policy 3.1 below, numerous streets, alleys, schoolyards, and other rights of way offer potential for cooperative recreational use. City departments and State agencies, such as the Municipal Transportation Agency and Caltrans, own and operate spaces that could be better utilized to serve as open spaces throughout the city. Spaces under freeways could serve as skate parks and bicycle paths, while city-owned parking lots could be developed as open space.

POLICY 2.9

Address physical and bureaucratic barriers to opening schoolyards as community open space during non-school hours.

During school hours, schoolyards provide students with a space to learn, socialize, exercise and play. They also often provide the greatest expanse of open space available in their immediate neighborhood. But if the neighborhood cannot tap into that resource when the school day is over, the schoolyard becomes a lost opportunity for half its life. Opening these spaces for use during these times could

provide much needed additional space in areas that are currently deficient in open space. This could prove mutually beneficial in that it could provide additional revenue for the school district and large new open spaces for residents without the high costs of acquiring new spaces.

In 2008, the San Francisco Unified School District (SFUSD) and the City launched a pilot program which opened eleven school yards to neighborhoods during weekend hours. This program has been successful in increasing community access to recreational space without any corresponding significant damage to school property. The program has continued to expand, to 21 schools in total, and offers many benefits to participating schools, such as open space improvements, grants to support physical education, gardening activities during the school day, and an activity fund to provide weekend activities open to the public. Schools receive maintenance, programming, and surveillance support from San Francisco Department of Public Works, San Francisco Recreation & Parks Department, and the San Francisco Police Department.

The City should consider ways to better market the availability of these spaces through multi-language signage and events in the space. Continued efforts to add greening to schoolyards would provide benefits to students as well as the neighborhood. As the program continues to expand, additional funding may be needed to address staffing, programming, and operational needs that come along with any joint use project. In addition, based on lessons learned from joint-use agreements thus far, the city should review and further codify the structure of its joint-use agreements to ensure consistency and ease of implementation.

The lessons from this pilot project could also be applied to other public or quasi-public sites. For example, as a next step the City could look at small branch libraries or child care centers as opportunities for increasing public access. The City should also approach private schools throughout the City and attempt to gain their support for such a program on their properties. Other cities have successfully established mutually beneficial joint use or development agreements that opened the privately-owned open space to the public. Private schools could use this vehicle as a way to be "good neighbors" that contribute to neighborhood needs, similar to private recreational facilities offering neighborhood discounts. Where liability is an issue, the City should look to equitably share liability with private entities or among multiple agencies.

POLICY 2.10

Improve access to and level of activity provided at San Francisco reservoirs.

The San Francisco Public Utilities Commission (SFPUC) owns and manages a significant amount of open space lands in San Francisco, as well as sites in Alameda, Santa Clara and San Mateo Counties. These lands are managed as watershed lands and serve as the city's major water source; in some cases these sites also serve as open spaces with scenic easements, and have recreational features such as playgrounds, walking paths, seating areas and even golf courses. The SFPUC has recently expanded uses on its lands to include sustainable agriculture and composting.

Because of the SFPUC's mission to protect public health and safety by ensuring water quality and the filtration capability of the existing system, these sites need to be carefully managed, and in some cases large-scale public recreational use is not possible given such constraints. However, increased public access to portions of its watershed lands with high recreational value is still possible, particularly on certain opportunity sites where the water quality would not be threatened.

Several of the SFPUC's treatment, tank or station sites may offer the potential to yield limited right-of-ways connecting proposed trails or greenways discussed elsewhere in this Element. Such connections, however, must be limited to pedestrian crossings, and made with consideration of safety of the underlying substructure and whether there is risk of potential degradation.

Future leases and lease renewals on watershed lands should be consistent with protection of existing natural values. Watershed lands should be managed to limit potential fire and erosion hazards. Access should be consistent with the legal rights of existing tenants, and with the intent of existing scenic and recreational easements.

The SFPUC should seek to increase public access to and enjoyment of surplus sites by seeking funding for site improvements, better access, and the ability to address safety issues at existing and potential open space properties.

In the case of reservoir lands outside of the City and County of San Francisco, the SFPUC has several long-standing agreements for the recreational, educational and agricultural use of its lands. These agreements have gone





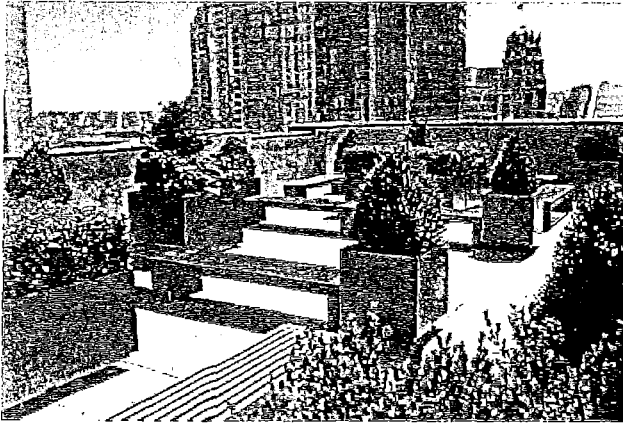
CITY AND COUNTY OF SAN FRANCISCO

SAN ALBAZ COUNTY

School Yards & SFPUC Sites With Open Space Potential

0 Miles 1
MAP 09

-  Existing Open Space
-  Opportunity Area
(School yards and SFPUC sites with open space potential)



Privately-owned Public Open Spaces (POPOS)

through extensive public processes and any change to the agreements would involve additional outreach and review. Some examples of successful joint-use of SFPUC lands include: Sawyer Camp Trail, one of the most popular trails in San Mateo County, which is located inside the Peninsula watershed and passes by the reservoir; and the Sunol Water Temple AgPark, an urban farm located on SFPUC land in Alameda County.

POLICY 2.11

Assure that privately developed residential open spaces are usable, beautiful, and environmentally sustainable.

In order to improve living conditions in each residential building and the quality of environment in San Francisco as a whole, the City should continue to require that all new residential development provide outdoor open space. Current San Francisco Planning code requires a minimum amount of open space and this minimum must be maintained. However, open spaces should not only meet a minimum size requirement but should also be usable, quality recreational opportunities directly outside residents' front door, and they should also supplement any public open space that is provided nearby.

In single-family districts, rear yards are required and these yards provide much-needed open space for use by residents, natural habitat value, as well as stormwater management benefits. In most multi-family zoning districts, a minimum of 60-125 square feet per unit is required. In some areas such as Downtown, Chinatown, and high-density residential zoning districts, minimum open space requirements can dip as low as 36 square feet per unit. This

requirement is too low, especially for areas that correspond with the high needs areas in *Map 7*. Comprehensive planning in these areas should consider if the requirements should be increased or how open space needs can be met with alternative methods.

In multi-unit developments, providing required open space as common space has many benefits. It provides a collective place for residents to gather, allowing residents to get to know their neighbors and fostering a sense of community. It also provides larger areas for explorative play for children, something small balconies and private spaces usually cannot provide. Finally, it can be more space-efficient than providing numerous smaller spaces, especially if placed on rooftops or adjacent to common entry points where space for access is already required. Common open spaces can expand these benefits to the broader neighborhood as well, if they are publicly accessible during safe times of the day, such as daylight hours, or if they contribute to scenery by being visible from the street. Therefore, open space requirements should include incentives to promote the provision of common open space, and publicly accessible common open space in particular.

The value of private open spaces rests largely on their design. Open spaces should be designed to relate to the type of development they support; while lower density districts may typically include ground level or rear yard gardens, higher density residential development can include not only rear yards or common courtyards at grade level, but also balcony, terrace and rooftop open space. Whatever type of open space is provided, it should be usable with landscaped areas that add greenery. Elements such as playground equipment, lawns, and gardens should be considered as well, based on the expected resident population of



Folsom Street



Linden Alley

the project. Appropriate minimum amounts of open space and guidelines should be developed to codify these recommendations.

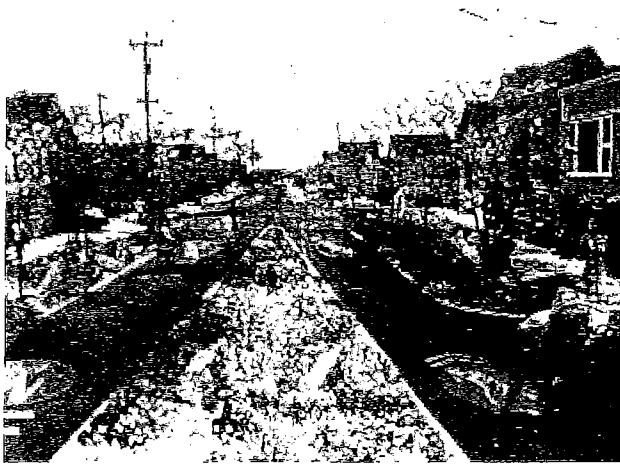
Open space in the downtown urban core is already very limited, and continued development will make meeting these higher requirements both more challenging and more necessary in order to maintain livability. Rooftop open spaces can provide a promising way to meet this challenge. Aside from the environmental benefits of roof greening – reduction of stormwater runoff, improvement in air quality, and reduction in energy used for building heating and cooling – green roofs can help to meet a number of the City's open space goals, from recreational enjoyment, to aesthetic improvement and greening of urban landscapes, to increased local food production and increased biodiversity. To enable quality roof space that provides these benefits, roofs should be constructed with load bearing capacity that can accommodate minimum soil depths for planting, or should at minimum support expected person occupancy and potted plantings. Design considerations also include safety, how the space overlooks neighboring properties, and where access can be provided.

POLICY 2.12
Expand the Privately-owned Public Open Spaces (POPOS) requirement to new mixed-use development areas and ensure that spaces are truly accessible, functional and activated.

In denser neighborhoods of the City, Privately-owned Public Open Spaces (POPOS) are a critical strategy to promote livability and provide much-needed spaces for relaxation, enjoyment of greenery, and socializing with others.

POPOS have been provided in a wide range of forms including outdoor seating with landscaping, to beautiful rooftop terraces, or indoor atriums. The quality of these spaces varies greatly, with some of them providing true oases with trees and planters and ample seating; while others are dark, tucked-away spaces that are accessible in name only. While this type of space can never replace true public open space, these spaces should be accessible to the public and should provide features to create a functional and pleasant open space. The City should deploy a variety of tools to educate the public of the existence of POPOS, especially in cases where such spaces are tucked away from the sidewalks—located on the building's rooftops or on the back of the building. The City should enforce all violations by existing POPOS, ensuring that they meet the conditions they were required to meet when the development was approved. The City should also reevaluate the guidelines provided in the Downtown Plan for required features of each type of POPOS, including seating, access to public restrooms, landscaping, and ecological functionality, to determine how to improve these open spaces. Additionally, the City should consider ways of allowing increased activation of the space and provide quality bicycle connections to these spaces.

POPOS have traditionally served the denser downtown core, a result of policies adopted in the 1980s mandating that new large commercial developments provide publicly-accessible open space. These policies should be evaluated to determine how POPOS requirements can be strengthened and expanded citywide. For instance, fee requirements could be extended to all types of development projects of a certain size (not just commercial uses) and provide an in-lieu fee option, as is the case in the Transit Center District Area Plan. Similarly, the Eastern Neighborhoods



Green Connections concept



Living Alley concept



Linden Alley

plan allows developers to satisfy some portion of private open space requirements by providing publicly accessible open spaces. Moving forward, POPOS requirements should ensure that such open spaces are designed and maintained to accommodate and attract a diverse range of users.

OBJECTIVE 3

IMPROVE ACCESS AND CONNECTIVITY TO OPEN SPACE

San Francisco is a dense, built-out city, where it may be difficult and expensive to acquire new land for parks and open spaces. Even though acquisition remains an important means to improve open space access, San Francisco's street network provides an untapped opportunity to supplement the city's open space system and link the network of open spaces. The street network, which makes up 25% percent of the City's total land area, is a valuable public space asset that can incorporate many types of open spaces, such as pocket parks, play streets, trails, and walkable streets and bike routes. These systems can connect residents to larger parks and open spaces and serve as restorative green spaces in their own right, places where residents can interact with urban nature on their doorstep. This system should be clearly legible, and include signage to guide pedestrians to and through the larger open space system.

POLICY 3.1

Creatively develop existing publicly-owned right-of-ways and streets into open space.

San Francisco's right-of-ways offer a variety of opportunities for developing open spaces. Streets can supplement traditional open spaces with standard streetscaping improvements such as bulb-outs, crosswalk improvements, tree planting, and pedestrian lighting. More extensive traffic calming on expanded or existing wide sidewalks can create additional pocket parks, sitting areas, and opportunities for sustainable plantings, community gardens, stormwater treatment, and other landscape elements.

Green Connections

Green Connections are special streets and paths that connect people to parks, open spaces, and the waterfront, while enhancing the ecology of the street environment. By increasing greening in the right-of-way with street trees, sidewalk gardens, and other landscaped areas, these streets will become sustainable corridors that enhance mobility, green neighborhood streets, and improve pedestrian and bicycle access to community amenities and recreational opportunities.

Living Alleys

The City's network of alleyways—small-scale, quieter streets that primarily serve vehicles needing access to adjacent properties—can provide vibrant open spaces, especially in dense neighborhoods. Some alleys, such as Belden Place in the financial district, are currently closed to traffic and provide an intimate atmosphere where patrons of adjacent restaurants can enjoy outside dining amidst a bustling urban environment. Other alleys, such as Maiden Lane, are closed during certain times of the day, serving adjacent businesses during the day, but allowing deliveries during the evening hours. Still other alleys, such as Linden Alley, are open to traffic, but carefully designed to ensure that drivers proceed slowly and with caution. These alleys are designed with seating, landscaping, and pedestrian-scale lighting to create useable and attractive open spaces. All three alley types should be considered and encouraged.

In some residential neighborhoods in the City, such as Visitacion Valley, Mission Terrace, Crocker Amazon and Bayview Hunters Point, there are narrow, unpaved alleyways that originally provided service vehicle access before paved roads were built. These abandoned and overgrown spaces can provide much-needed spaces that supplement the traditional open space, potentially providing walking and biking paths, or seating, landscaping, and lighting appropriate to the area. Using the City's Better Streets Plan, the design for the different types of alleys can be implemented. The City should study different neighborhood needs and determine a priority plan for creating living alleys in areas most in need of these improvements.



Living Street on Rincon Hill



Parkway on Sunset Boulevard



Sunday Streets in the Western Addition

Living Streets

Living Streets are wider streets where sidewalks are expanded into excess right-of-way to accommodate formal open spaces or linear parks. Wide streets that have excess right-of-way provide an opportunity to develop living streets, especially where dense residential developments are being built. Many of these areas are deficient in open space, and the streets should be designed with places for relaxation, recreation, and neighborhood gatherings.

Enhancing Existing Parkways

Parkways are streets with broad, well-landscaped medians and sidewalks that provide recreational paths while moving bikes and vehicles. These streets function not only as transportation corridors, but also as linear parks, creating a green network. This green space can often be effectively used for pedestrian and open space functions, by providing multi-use trails, seating, and open spaces. They can also perform ecological functions, including stormwater runoff retention and infiltration and creating habitat. Two of the existing parkways, Park Presidio Boulevard and Sunset Boulevard, offer a major opportunity to enhance the north-south connections from Golden Gate Park. These streets already provide ample trails and open space, but are in need of overall care, improved crossings, and enhancement. By utilizing the existing open spaces offered by these parkways, the City is focusing on how to make the most of what we have. The City should develop a specific design program to address the enhancement of these two parkways.

Temporary and Permanent Street Closures

The City's Sunday Streets program – which was modeled on a 25-year program in Bogota, Colombia – has been a huge success. The proposal began in 2008 with the idea to close one street to cars on Sunday mornings so people can get out and be active in a car-free space. The program has since expanded to offer more opportunities for temporary public gathering spaces. Additionally, City agencies' collaborative effort to transform excess pavement into public spaces is on-going and several projects are being initiated around the city. This concept of temporary or even permanent street closures in the City presents a great opportunity to take advantage of existing street rights-of-way to create space for people to walk or ride their bike.

See *Map 3: Existing and Proposed Open Space* for more information on existing and proposed green street concepts.

POLICY 3.2

Establish and Implement a network of Green Connections that increases access to parks, open spaces, and the waterfront.

Despite San Francisco's many open space assets, park accessibility can be a challenge, particularly for those on bike or foot. For decades, streets have been built to maximize car volume and speed, resulting in roads with fast-moving traffic, inadequate pedestrian and bicycle facilities, and other barriers that make it difficult and unpleasant for people to walk, bike and use other forms of active transportation.

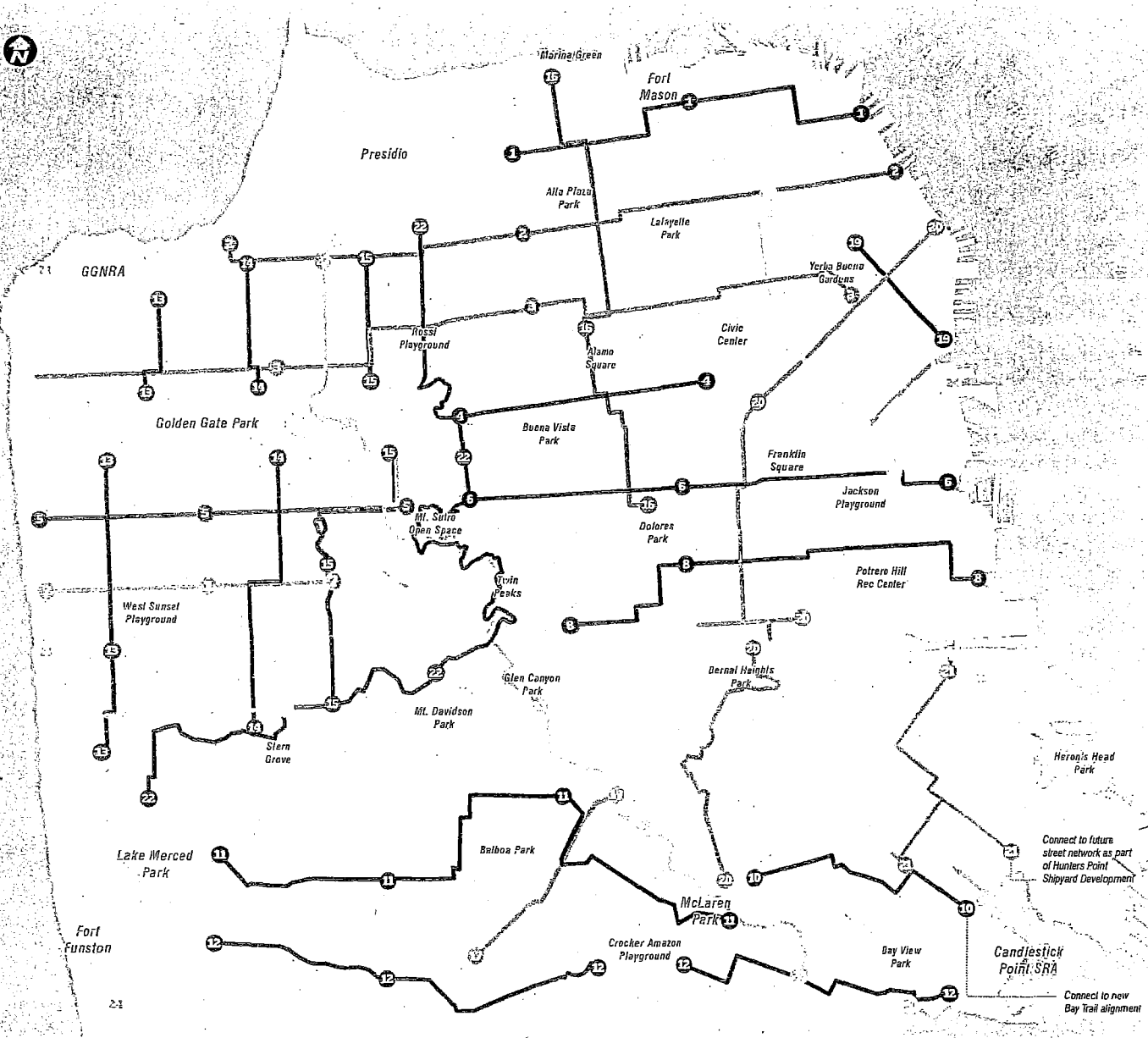
In recent years, San Francisco has made great strides in retrofitting streets with pedestrian and bicycle improvements that make it easier to access parks, schools and other neighborhood destinations. Green Connections builds on this work, envisioning a 115-mile network of safe, functional, and attractive streets connecting people to parks, open spaces, and the waterfront. Green Connections is designed to meet three goals:

- **Public Health:** Increase park access
- **Sustainability:** Enhance urban ecology
- **Livability:** Support neighborhood stewardship and placemaking

Routes on the Green Connections network should significantly calm traffic, prioritize pedestrian and bicycle travel, enhance urban ecology and ecoliteracy, include beautification and artwork, and provide opportunities to gather and play. Routes will also be designed to be consistent with the Better Streets Plan, which creates a unified set of standards, guidelines, and implementation strategies to govern how the City designs, builds, and maintains its pedestrian environment to ensure streets contribute to a gracious public realm.

Green Connections will not create a new City program, rather, it calls for coordinating existing initiatives such as traffic calming and stormwater management, with the goal of creating a cohesive network of improved neighborhood walking and bicycling routes over the next twenty years. The scale of the network creates opportunities to coordinate with city projects and private development. Additionally, community members and neighborhood groups will play an important role in the Network's implementation and stewardship.

See *Map 10: Green Connections Network*.



Green Connections Network

ROUTES

- Presidio to Bay: *Monarch*
- China Beach to Bay: *Pygmy Nuthatch*
- Market to Beach: *Anna's Hummingbird*
- Page, Stanyan to Market: *Cedar Waxwing*
- Kirkham, Sutro to Beach: *Coyote Bush*
- Mission to Peaks: *Anise Swallowtail*
- Ortega, 14th St to Beach: *Coastal Prairie*
- Noe Valley to Central Waterfront: *American Bush-tit*
- Vicente, 20th to Beach: *Coastal Dune Scrub*
- Yosemite Creek: *Red-winged Blackbird*
- Ingleside: *Coast Live Oak / California Buckeye*
- Lake Merced to Candlestick: *Western Fence Lizard*
- Lincoln Park to Zoo: *American Dune Grass*
- Presidio to Park Merced: *Coast Buckwheat*
- West of, Twin Peaks: *Green Hairstreak*
- Marina Green to Dolores Park: *West Coast Painted Lady*
- Excelsior: *Cliff Swallow*
- Tenderloin to Potrero: *Western Tiger Swallowtail*
- Downtown to Mission Bay: *Western Gull*
- Folsom, Mission Creek to McLaren: *Pollinators*
- Bayview to Bay Trail: *Black-tailed Jackrabbit*
- Ridge Trail: *Nuttall's White-crowned Sparrow*
- Crosstown Trail: *Coyote*
- Shoreline: *Western Snowy Plover and Salt Marsh Harvest Mouse*

0 Miles 1

MAP 10

Notes: Some portions of routes may not be ideal for bicycles due to conditions such as steep topography, stairs or trails

The proposed network falls mostly on public rights of way, but occasionally deviates onto public properties such as park lands.

POLICY 3.3

Develop and enhance the City's recreational trail system, linking to the regional hiking and biking trail system and considering restoring historic water courses to improve stormwater management.

San Francisco currently has an extensive network of trails that provide local opportunities for walking and biking and link to regional trails and open spaces throughout the Bay Area. These trails surround the Bay, parallel the ocean, extend through parks and neighborhoods and connect existing open spaces. Many of these trails have gaps and lack adequate signage. The City should prioritize filling these gaps and increasing awareness of the trails through updated signage. New trails are also envisioned to provide additional hiking and biking opportunities and important wildlife corridors. The City should also work with Daly City and San Mateo County to encourage better links to San Bruno Mountain and trails to the south.

New trails throughout the city could consider historic water courses to incorporate stormwater management, provide trail connections, or restore aquatic and riparian habitats or wildlife corridors. These trails should provide better ways to move people through increased hiking and biking opportunities. Some adopted Area Plans, such as the Glen Park Area Plan, have identified such opportunities.

Continuous Waterfront Trail

The trails along the waterfront are administered by many different jurisdictions including regional, city, and federal agencies. However, visitors do not necessarily distinguish between these jurisdictions, and want a continuous, usable trail system along the waterfront. The City should improve trail signage to ensure users are provided clear routes and destinations and work to fill any gaps in the proposed trails and in the connections between them where it does not impede on water dependent commerce.

Bay Trail

The Bay Trail is a regional trail developed by the Association of Bay Area Governments (ABAG) that is proposed to surround the entire San Francisco Bay. In San Francisco, this trail would extend from the Golden Gate Bridge along the bay to the Central Waterfront neighborhood, where the trail is being built inland along Illinois Street through Pier

70 (which, along with the Power Plant site, will eventually provide opportunities for waterfront access). The Bay Trail will eventually continue around the Bay through Hunters Point Shipyard and down to San Mateo. (See *Map 11: San Francisco Bay Trail*.) The gaps are shown in *Map 11* and the City should prioritize closing these gaps to ensure a complete Bay Trail. Closing the Bay Trail gaps would also help in the development of the Blue Greenway, a continuous corridor that links the existing and proposed open spaces through the Bay Trail and the San Francisco Water Trail. The City's Blue Greenway project intends to complete San Francisco's southeast section of the Bay Trail and that portion of the Bay Area Water Trail, described below.

Coastal Trail

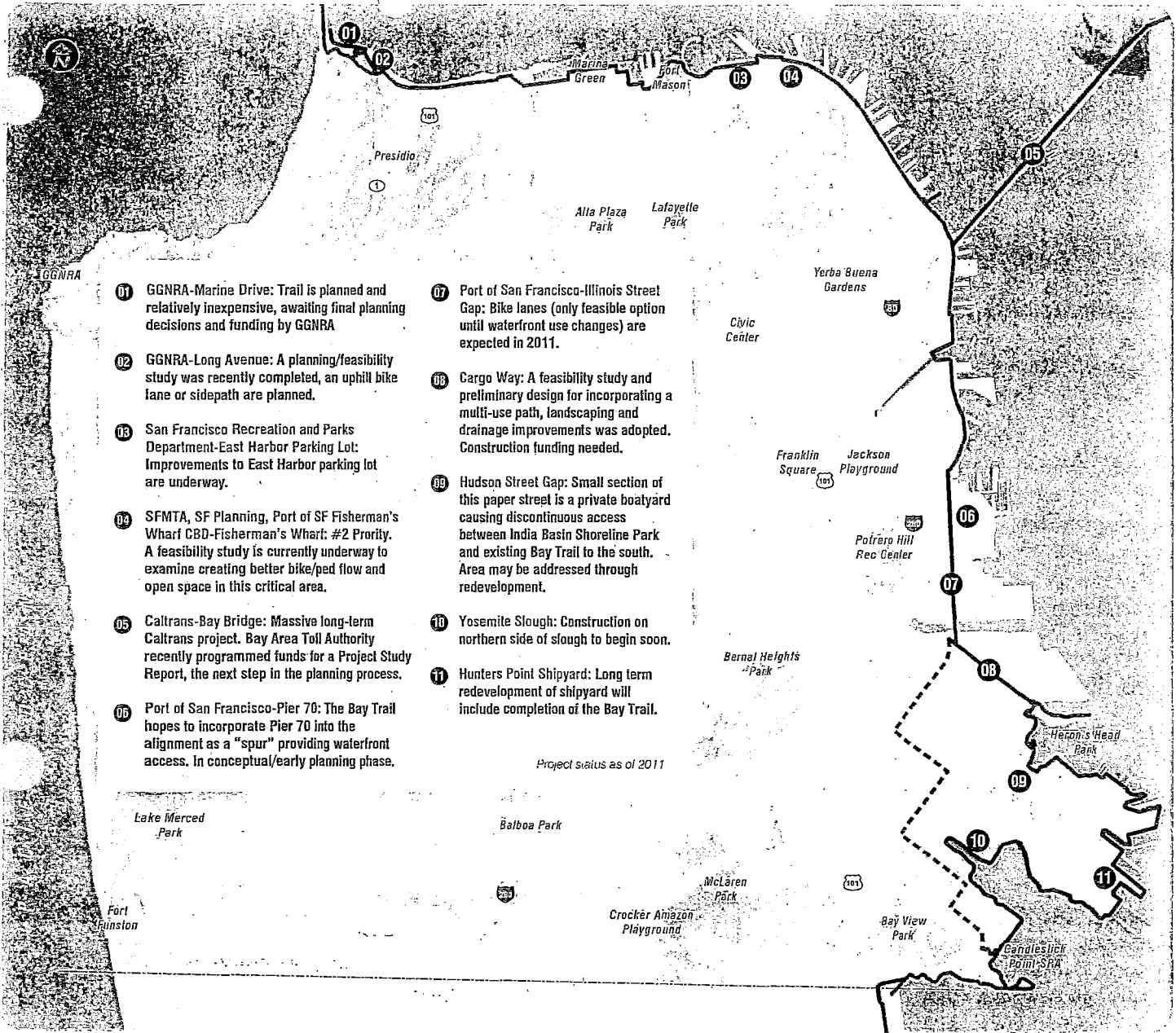
The California Coastal Trail is a network of trails for walkers, bikers, equestrians, wheelchair riders, and others along the entire 1,200 miles of the California coast. Through San Francisco the 10.5 mile trail connects many scenic and tourist attractions along the coastline, including the Golden Gate Bridge, the Presidio, Ocean Beach and Fort Funston. While the current trail is relatively complete, prioritizing improvements such as signage and fixing small gaps would ensure that the trail is accessible and visible for its entire route.

Bay Area Water Trail

The State Coastal Conservancy is leading the implementation of the San Francisco Bay Area Water Trail Plan (Water Trail Plan), a new regional access project. The Water Trail will be a network of access sites (or "trailheads") that will enable people using non-motorized, small boats or other beachable sailcraft—such as kayaks, canoes, dragon boats, stand-up paddle and windsurf boards—to safely enjoy single and multiple-day trips around San Francisco Bay. This regional trail has the potential to enhance Bay Area communities' connections to the Bay and create new linkages to existing shoreline open space and other regional trails, such as the Bay Trail. The Water Trail will include educational, stewardship, and outreach components.

The Bay Area Ridge Trail

The Bay Area Ridge Trail is a multi-use trail that links the hills and ridges of the nine counties of the Bay Area. It will be approximately 550 miles in length when completed. Most of the 13.5-mile portion of the trail in San Francisco was completed in 1992 and is in the process of being



- 01 GGNRA-Marine Drive: Trail is planned and relatively inexpensive, awaiting final planning decisions and funding by GGNRA
- 02 GGNRA-Long Avenue: A planning/feasibility study was recently completed, an uphill bike lane or sidepath are planned.
- 03 San Francisco Recreation and Parks Department-East Harbor Parking Lot: Improvements to East Harbor parking lot are underway.
- 04 SFMTA, SF Planning, Port of SF Fisherman's Wharf CBD-Fisherman's Wharf: #2 Priority. A feasibility study is currently underway to examine creating better bike/ped flow and open space in this critical area.
- 05 Caltrans-Bay Bridge: Massive long-term Caltrans project. Bay Area Toll Authority recently programmed funds for a Project Study Report, the next step in the planning process.
- 06 Port of San Francisco-Pier 70: The Bay Trail hopes to incorporate Pier 70 into the alignment as a "spur" providing waterfront access. In conceptual/early planning phase.

- 07 Port of San Francisco-Illinois Street Gap: Bike lanes (only feasible option until waterfront use changes) are expected in 2011.
- 08 Cargo Way: A feasibility study and preliminary design for incorporating a multi-use path, landscaping and drainage improvements was adopted. Construction funding needed.
- 09 Hudson Street Gap: Small section of this paper street is a private boatyard causing discontinuous access between India Basin Shoreline Park and existing Bay Trail to the south. Area may be addressed through redevelopment.
- 10 Yosemite Slough: Construction on northern side of slough to begin soon.
- 11 Hunters Point Shipyard: Long term redevelopment of shipyard will include completion of the Bay Trail.

Project status as of 2011

San Francisco Bay Trail

0 Miles 1

MAP 11

- San Francisco Bay Trail
- San Francisco Bay Trail (Gap)
- San Francisco Bay Trail (Interim)

reevaluated by the Bay Area Ridge Trail Council, with the goal of improving its route, signage and connections to other city and regional trails. The City should work with the Council and the community in this rerouting effort, especially one that takes users through parks and makes connections to other trails, such as the Bay Trail, the Coastal Trail, and the proposed new cross-town corridor described below. The City should also assist the Ridge Trail Council in its efforts to improve signage along the route. See *Map 12: Regional Trails*.

New Cross-Town Corridor

A proposed corridor would connect wildlife habitats and allow hikers an urban wildlife trail experience through some of the City's most diverse natural areas. The corridor would begin in the Presidio, travel through Golden Gate Park, stop at Twin Peaks and Mt. Sutro, wind through Glen Park Canyon, then McLaren Park, and finally reach the San Francisco Bay in Candlestick Point Recreation Area. While the exact route of this proposed new corridor has yet to be determined, it could include an extension to connect with Lake Merced and opportunities to daylight historic creeks in an enhanced green corridor. The City should work with pertinent Federal, State, and local agencies along with the community to develop this new corridor.

POLICY 3.4

Encourage non-auto modes of transportation – transit, bicycle and pedestrian access—to and from open spaces while reducing automobile traffic and parking in public open spaces.

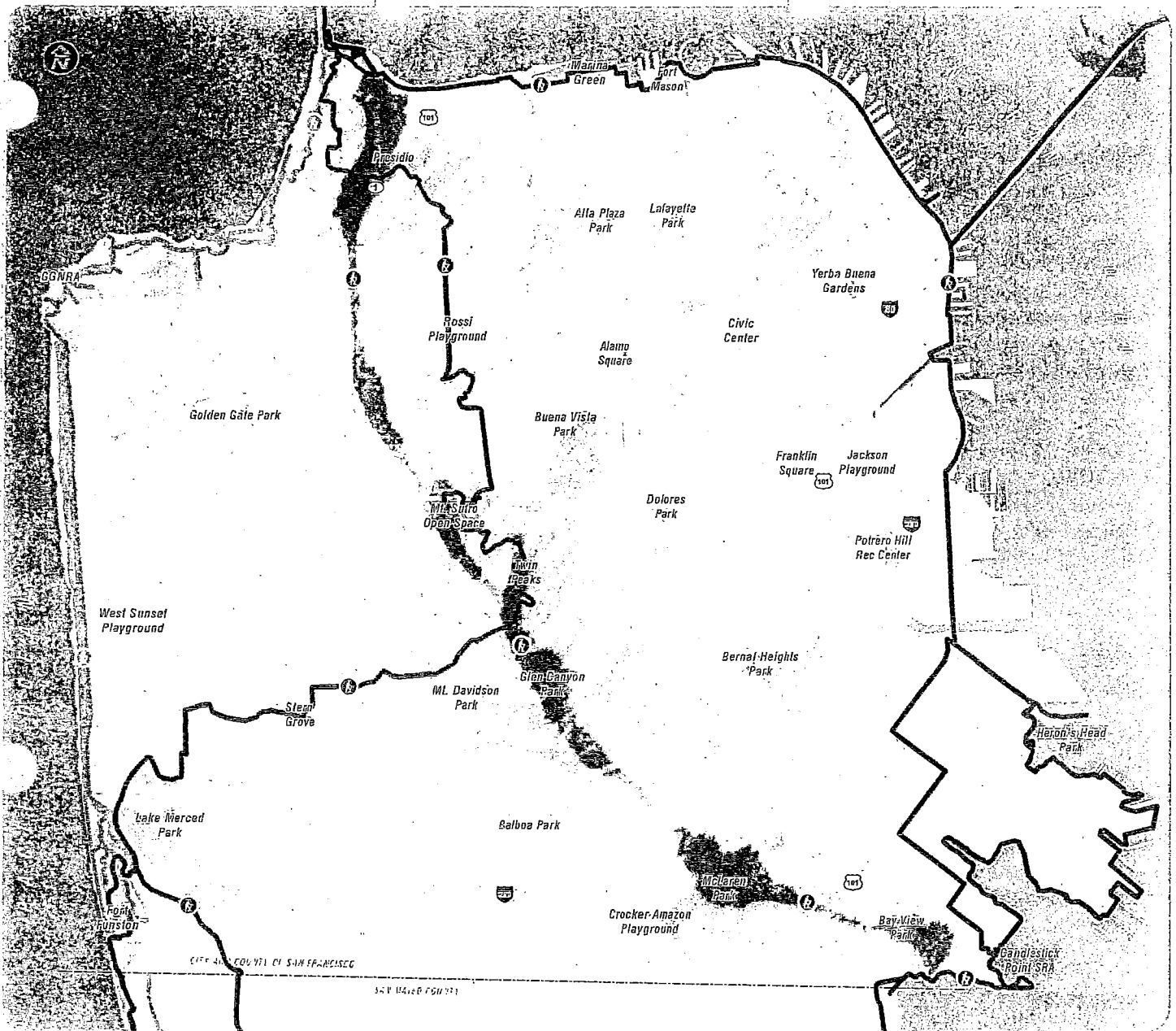
San Francisco's transit first policy, adopted by the Board of Supervisors as Section 8A.115 in the San Francisco Charter, emphasizes the importance of providing and prioritizing transportation via transit, walking, and bicycling for all trips in the city including to parks and open spaces. Non-auto transportation is especially important because many of the City's large parks are located far from dense population centers and high needs areas. While the City's extensive network of transit allows users to access all of the City's parks, crossing the City, especially on a weekend, can often entail multiple transfers and long waits because of less frequent service. The City should consider increased and/or express local bus service to major open space amenities particularly from high needs areas. The City should also explore the idea of a "Green Transit Program," a bus that delivers riders from the City's high needs areas

to large parks. This service should be affordable and allow families an easy way to access the City's large open spaces. Additionally, the City should improve transit access to regional open spaces outside of San Francisco such as Marine Headlands, Mount Tam, Pacifica beaches, and the San Bruno Mountains.

Bicycle routes that serve to get riders to and around our open spaces also provide a key component of the city's non-auto transportation network. Many of the improvements in the City's Bicycle Plan address the need to connect people to open spaces. The City should prioritize bicycle improvements that provide both a connection to the City's open spaces and serve as the most heavily utilized routes. For example, the improvements suggested along the panhandle would improve access to the Panhandle and Golden Gate Park as well as facilitate this route as a commuter corridor for bicyclists. The City should also work to provide bicycle parking at entrances to park facilities and throughout large open spaces to promote increased bicycle usage. In August 2013, the Bay Area BikeShare was launched with 34 San Francisco locations. The City should consider expanding those locations to serve major parks and open spaces, like Golden Gate Park, that are on the City's bike network.

Heavy or fast traffic in and around public open spaces endangers pedestrians, limits access to open space, endangers plant and animal life and makes the open space less enjoyable to be in. Excessive parking spoils the user experience and untimed parking encourages non-park users to park, restricting availability of spaces for park visitors and residents alike. The following methods of reducing traffic in and around public open space are consistent with the urban design and transportation elements of the General Plan and should be applied where possible:






- Consider eliminating some roadway cut-throughs and ensure new roads are necessary for park access, not only as through-ways.
- Increase traffic calming on roads. Reduce the capacity of roads in public open spaces to encourage slower travel and provide safer routes for pedestrian and bicycle travel.
- Establish strict speed limits. Monitor speeds throughout the parks and ensure that strict speed limits are enforced.
- Study and implement, where appropriate, timed parking that supports typical-length visits to a park, but discourages all-day parking during the week.



Regional Trails

0 Miles 1

MAP 12

-  San Francisco Bay Trail
-  San Francisco Bay Trail (Proposed)
-  California Coastal Trail
-  Bay Area Ridge Trail
-  Crosstown Trail

POLICY 3.5

Ensure that, where feasible, recreational facilities and open spaces are physically accessible, especially for those with limited mobility.

The City should ensure that recreational facilities and public open spaces are accessible to all San Franciscans, including persons with special recreational needs, where feasible. For example, the hilly topography of the City makes providing some paths ADA accessible difficult to achieve. People with special needs may include seniors, children (particularly the very young), and people with disabilities. In order to achieve this policy, park and recreation facilities should be planned and programmed for people with special recreational needs in mind. The following criteria should be followed when developing or renovating any new space:

- All parks and open spaces should comply with applicable requirements of the Americans with Disabilities Act and the California Building Code.
- The City should utilize the US Access Board's recreation facilities and outdoor area accessibility guidelines as a best practice for design and construction.
- The City should also ensure that routes to and from the open spaces are accessible. For example, the route from the public transit stop to the park should be fully accessible.

POLICY 3.6

Maintain, restore, expand and fund the urban forest.

Trees and understory plantings in city parks, developed public open spaces, city streets and private property collectively form the urban forest. The urban forest contributes substantially to our quality of life and to the ecological functioning of our city. Trees and landscaping soften the urban environment, provide habitat, improve air quality, absorb carbon and mitigate stormwater runoff. Given these benefits, trees are an essential piece of the City's infrastructure. The urban forest requires consistent maintenance, funding and long-term planning to ensure its health and growth over time.

The SFRPD plants and maintains a variety of landscaping, including approximately 131,000 trees in city parks and other SFRPD open spaces. The Department of Public

Works, Bureau of Urban Forestry (BUF) has permit jurisdiction over 105,000 trees and landscaping in the public right-of-way and provides maintenance along designated streets. Finally, property owners maintain trees within their property line as well as street trees and landscaping along their street frontage on streets not maintained by BUF.

The Planning Department, in collaboration with the Department of Public Works, is creating a plan to promote San Francisco's urban forest with a focus on street trees. The Urban Forest Plan - Phase 1: Street Trees (2014) identifies policies and strategies to proactively manage, grow and protect the City's street tree population. A corresponding planning effort is needed, focused on policies and recommendations pertaining to trees in parks and open spaces. The Urban Forest Plan - Phase 2: Trees in Parks & Open Spaces should be funded and carried out. Many of the city's trees and understory plantings in our parks have reached maturity and are in a state of degradation. A thorough tree replanting strategy in parks and open spaces that addresses not only hazardous trees, but also develops a comprehensive replanting strategy that includes a system-wide prioritization framework, should be pursued. In addition, a third phase of urban forestry planning (Urban Forest Plan - Phase 3: Buildings and Private Property) should be completed to present recommendations for trees and landscaping on private property as well as on building (i.e. living architecture, green roofs and walls). The completion of all three planning phases will produce a holistic vision for the City's urban forest.

Urban forestry planning in San Francisco requires a Citywide Street Tree Inventory and Parks Tree Assessment to gather the data needed to achieve a higher level of tree management and care. The Citywide Tree Inventory should include geographic location, tree species, size, age, and disease classes, and other related information for trees within the public right-of-way. A Parks Tree Assessment should evaluate the condition and needs of trees under SFRPD's maintenance purview. Upon completion of these studies, property owners should be encouraged to plant trees and landscaping fronting their property consistent with the City's Urban Forest Plan and DPW's tree and landscaping planting guidelines. Additionally, the City should seek long-term funding sources to maintain and expand the urban forest on streets and parks. Codes relating to planting and maintaining street trees and landscaping in public spaces, parks, along public right-of-ways and within private property should be rigorously enforced in order to maximize the extent, health, and longevity of the City's urban forest.

OBJECTIVE 4**PROTECT AND ENHANCE THE BIODIVERSITY, HABITAT VALUE, AND ECOLOGICAL INTEGRITY OF OPEN SPACES AND ENCOURAGE SUSTAINABLE PRACTICES IN THE DESIGN AND MANAGEMENT OF OUR OPEN SPACE SYSTEM**

San Francisco is a heavily urbanized city, which nonetheless has a rich variety of plant and animal communities. Among these are coastal scrub, grassland, oak woodlands, marsh, and stream-side habitats and their associated wildlife.

Some of these habitats hold species found nowhere outside of the Bay Area. The City also has significant landscaped areas, such as conifer plantings in Golden Gate Park. By providing food and shelter for migratory and resident birds, butterflies, and insects they too play a major role in supporting San Francisco's biodiversity. Biodiversity includes the variety of living organisms, the genetic differences among them, and the communities and ecosystems in which they occur. Maintaining biodiversity requires genetic diversity, species diversity, and habitat diversity. San Francisco can be a leader in creating new and more sustainable open spaces by ensuring that all open spaces, including new and renovated park spaces, are developed in a way that enhances and works with local biodiversity.

POLICY 4.1**Preserve, protect and restore local biodiversity.**

San Francisco's ecological communities include freshwater and tidal wetlands, riparian areas, grasslands, coastal prairies, oak woodlands, coastal scrub, dunes, rock outcroppings and our designed landscapes. Some of these areas serve as habitat for unique species including many rare and endangered species, such as the red-legged frog, snowy plover, and mission blue butterfly. Yet San Francisco continues to lose species diversity due to isolation and fragmentation of habitats and invasive species.

Parks and open spaces in San Francisco include both native and non-native species, both of which can contribute to local biodiversity. The City should employ appropriate management practices to maintain a healthy and resilient ecosystem which preserves and protects plant and wildlife habitat, especially rare species which are the primary contributors to local biodiversity.

Restoring some ecosystems would also help enhance local biodiversity. Wetlands and riparian areas, for example, provide habitat, biological benefits, and resource-efficient methods for treating storm water runoff in addition to serving recreational uses. However, many of San Francisco's wetlands have been buried by development and little of the original wetlands have survived in San Francisco. A number of restoration projects have recently been completed or are underway, including projects at Crissy Field, Heron's Head, Pier 94, Mountain Lake and Lake Merced. The City should continue to support the monitoring and restoration of these wetlands.

The long-term vision for the City should also include conserving and restoring hydrological resources, including riparian communities, seeps, springs, creeks, ponds, and lakes; and exploring the feasibility of day lighting creeks that are completely or partially buried, for example Islais Creek, Yosemite Creek and Mission Creek. In order to ensure the preservation and restoration of our local biodiversity, the City should increase awareness of the benefits of all ecological communities as well as how the public should and should not interact with these areas.

POLICY 4.2**Establish a coordinated management approach for designation and protection of natural areas and watershed lands.**

San Francisco's natural areas are the undeveloped remnants of the historical landscape which contain rich and diverse plant and animal communities. Following the adoption of the 1986 Recreation and Open Space Element, the SFRPD exacted policies to develop a Natural Areas Program to manage the 530 acres of parks and portions of parks that constitute natural areas. The mission of the program is to restore and enhance remnant natural areas and to develop and support community-based stewardship of these areas. Policies governing access and appropriate use and enjoyment of protected natural areas should ensure that the natural resource values are not diminished or negatively affected by public use.

In addition to the SFRPD-owned land, there are a number of natural areas under the jurisdiction of other city, state and federal agencies and in private ownership. The long-term ownership and management of these lands is uncertain because these properties are not under rules and restrictions that would prevent them from being sold and/

or developed. The City should ensure that a comprehensive inventory of all natural areas owned by city agencies other than the Recreation and Park Department and by private landholders is developed, in order to preserve the City's biodiversity and natural areas more holistically. This inventory should include promoting habitat corridors among open spaces and natural areas. The following criteria should be used to determine what constitutes a significant natural resource area worthy of protection:

- The site is undeveloped and relatively undisturbed, and is a remnant of the original natural landscape and either supports a significant, diverse, or unusual indigenous plant or wildlife habitat, or contains rare geological formations, or riparian zones.
- The site contains rare, threatened, or endangered species, as identified by the U.S. Fish and Wildlife Service or California Department of Fish and Wildlife, or contains habitat that has recently supported and is likely again to support rare, threatened, or endangered species.
- The site is adjacent to another protected natural resource area and, if protected from development, the two areas together would support a larger or more diverse natural habitat.

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

Once the significant natural resources outside the jurisdiction of RPD are identified, the City should develop a management plan for these natural areas. Many of the properties are currently managed by the City, State or Federal agencies whose mission is not consistent with the preservation of natural areas. In these cases, consideration should be given to joint management through a conservation district or a governmental entity that controls the management of these areas.

POLICY 4.3

Integrate the protection and restoration of local biodiversity into open space construction, renovation, management and maintenance.

The City should work to protect and enhance biodiversity throughout the parks and open space system. When parks and open spaces are renovated and new spaces are planned or acquired the City should work to ensure that these spaces are environmentally sustainable, from construction to management. New buildings and park features should protect and help restore local biodiversity. Appropriate criteria should be applied to different open spaces depending on the sensitivity of the habitat, the proposed uses, and the amount of space the new or renovated project will provide. However, certain key requirements, which the City is currently working on, will be applied to all new and renovated open spaces:

- **Soil conservation.** In order to conserve and to use local soil, a cut fill balance will be maintained where feasible to minimize the need to transport soil to or from the project site.
- **Native and drought-tolerant plants.** The City is working to replace invasive and water-intensive species and species of minimal habitat value with species that fit better with San Francisco's natural environment. Just as the City restores degraded areas with local native plants for wildlife habitat and biodiversity in natural areas, habitat and biodiversity should be considered along with traditional landscaping objectives of aesthetics and cultural value throughout our park system and in the streetscape. Drought-tolerant non-native plants can also contribute to the thriving of local biodiversity and meet many of these overall goals. To provide native and drought-tolerant plants, the City should continue to work with private entities and City agencies to encourage native and drought-tolerant plant nurseries.
- **Lighting.** Park lighting should be environmentally efficient and provide safety and security to park users, while being as limited as possible in order to protect wildlife in natural areas from the impacts of light pollution.
- **Habitat and Wildlife.** Where appropriate, utilize materials and design spaces, facilities and buildings in a manner that provides habitat for local and migrating wildlife.

- **Construction and Siting:** Utilize green building practices, local materials, services and supplies; site new structures in locations that minimize disruption of the natural environment; and mitigate impacts during construction phases.
- **Waste management:** The City should continue to enforce the no feeding of wildlife provision of the Park Code and manage recreational facilities to minimize wildlife access to human garbage.
- **Stormwater management** The City should continue to creatively solve for the management of stormwater runoff in our dense urban landscape. Managing the city's stormwater runoff in an environmentally-sensitive manner, such as using bioswales or through creek restoration could provide an increasingly biodiverse habitat.

POLICY 4.4

Include environmentally sustainable practices in construction, renovation, management and maintenance of open space and recreation facilities.

The City has been working to develop more sustainable practices in the development or renovation of their park and recreational facilities. Below are a number of programs that highlight efforts throughout the City.

- **Water conservation, recycling/reuse, and stormwater mitigation.** The SFPUC has developed a recycled water program with the North San Mateo County Sanitation District to use recycled water for three golf courses: Lake Merced Golf Club, Olympic Club, and San Francisco Golf Club. The SFPUC is also working on a treatment facility for recycled water on the city's west side. One of the primary uses of this recycled water would be to irrigate parks and open spaces in City property such as Golden Gate Park. The Recreation and Parks Department is the biggest user of water in the city, with an annual total usage of 691 million gallons of water. It is therefore critical to conserve potable water and promote alternative water resources such as recycled water and stormwater capture, especially for uses such as irrigation. Expanding the use of recycled water and considering other innovative treatments to capture and reuse stormwater runoff are being pursued by the SFPUC, the Recreation and Park Department, and the Office Community Investment and Infrastructure. Impervious surfaces are being limited or retrofitted to utilize pervious surfaces and innovative methods for capturing and reusing storm water, such as cisterns. Support for these efforts should continue, as they offer an easy and effective solution to water conservation and to potential water shortages caused by drought, earthquakes, or decline in the snow pack.
- **Energy production and efficiency.** The City's open spaces could serve as a source of energy for the City. For example, new or renovated buildings could utilize solar panels or other alternative energy sources. The SFRPD has also been a leader in the City in trying to reduce their energy usage. The goal is to realign the records so that meters are tied to park names and building names in order to have greater control of energy reduction measures. Currently, meter numbers are tied to physical addresses only with multiple meters and multiple addresses in one property.
- **Composting and Mulching.** The City has had a composting program since 1996. SFRPD is one of the leading partners and one of the biggest producers of green waste in the City. The recycling of this waste is used not only in city parks and in community gardens throughout the City, but is provided to farms and households for use in their private gardens.
- **Integrated Pest Management.** The City of San Francisco follows the award-winning Integrated Pest Management ordinance. The law requires that when the City is managing unwanted insects, rodents, birds, weeds, or other organisms for buildings & landscapes that the City follow a series of requirements including: how integrated pest management (IPM) is implemented, limitations on pesticide products, exemptions to the Reduced Risk Pesticide List (that may be used as a last resort), posting and notification for pesticide treatments, recordkeeping and data requirements, and accountability. The program must be followed by all city agencies and any city agency that leases land from the city.
- **Historic Preservation** Appropriate repair and retrofitting of existing historic resources is an inherently sustainable strategy and ensures that the character and integrity of significant historic resources is maintained. Adaptive reuse, such as for new programming, accessibility, life and safety, and systems upgrades, is a strategy that can be used to conserve materials, minimize impacts to the environment, promote a sense of place, and improve livability.

OBJECTIVE 5**ENGAGE COMMUNITIES IN THE STEWARDSHIP OF THEIR RECREATION PROGRAMS AND OPEN SPACES**

Residents can be a major asset in addressing open space needs, providing oversight, maintenance and stewardship. They can be instrumental in ensuring that recreation and open space activities are rooted in local needs and can offer a community-based solution to public sector gaps, particularly in times of budget constraints.

POLICY 5.1

Engage communities in the design, programming and improvement of their local open spaces, and in the development of recreational programs.

The most successful public spaces are those that respond to the needs of their users. Statistics, maps and figures can only go so far in determining a community's need – they can explain proximity to open space, they can describe type of open spaces that are missing (hiking trails, sports fields, playgrounds, etc.), but they cannot identify the components of open space design which will most reflect their user community.

Open space designs and improvement plans, recreational programs, partnerships for new concessions, and other park additions should always include community participation. The level and intensity of community outreach and engagement may differ based on project type, ranging from written notifications, to community meetings and workshops, to design charrettes. Outreach and engagement efforts should start at the initial project stage, which provides the opportunity to learn about the local community's recreation and open space needs, and continue throughout the project. The City should strive to actively engage community members throughout the process by using a variety of community engagement tools.

A diversity of recreation programs is typically needed to serve the recreation needs and interests of San Franciscans. The City should consider many tools and criteria when developing recreation programs. Some useful tools include but are not limited to:

1. the City Survey from the Controller's Office, which provides an overview of park usage, park quality, and park programming from residents;



2. intercept surveys, which provides observational park usage;
3. user surveys from recreation programming participants;
4. facility-based input to provide neighborhood feedback on recreation programming; and,
5. emerging technologies that survey existing and potential park users including residents, workers, and visitors.

Connecting with and engaging the community will expand opportunities to honor community heritage, facilitate participation in broader arts and cultural activities, and ensure that facilities and programs are appropriate for park users and reflect community character.

Community representation can be continued as the park evolves by including plans that promote volunteer projects derived from the interest and abilities of the community, under the direction of park staff.

POLICY 5.2

Increase awareness of the City's open space system.

San Francisco's open spaces offer residents, visitors and workers many opportunities for recreating and relaxing. The enormous variety of spaces offers a range of options for the user, from a small plaza where downtown workers sit to enjoy their lunch, to large parks where hikers can walk through a redwood grove, to the numerous classes and programs offered by the Recreation and Park Department for families.

The City should coordinate efforts to increase awareness of all City-owned open spaces and promote an increased use and activation of underutilized spaces, which are often underused simply because people are unaware of all the amenities offered. The Recreation and Park Department should continue to enhance its presence on the internet, social media, and emerging technology. All City agencies owning public open spaces should also use emerging technologies to increase awareness of public open spaces. Ideally, the City should create a holistic platform that includes information (hours of operation, permitted activities, community stewardship opportunities, etc.) on all publicly-owned parks and open spaces regardless of the owning agency.

Open spaces also provide an opportunity to increase public understanding of and appreciation for San Francisco's unique natural heritage. Larger open spaces, such as natural areas and parks, as well as smaller landscaped areas, such as POPOS and street parks, may present opportunities to build awareness and understanding of ecology and the natural world through design elements such as demonstration gardens, educational signage, and interpretive artwork. The City should continue to explore creative partnerships with community groups, educational institutions, and cultural organizations to expand environmental education programs and provide opportunities for community-based stewardship and conservation. Such programs should target youth and high-needs areas in particular.

POLICY 5.3

Facilitate the development of community-initiated or supported open spaces.

Publicly-owned and managed open spaces, such as those managed by the SFRPD, are only one component of the City's open space network. Informal, community-organized open spaces, such as community gardens, green opportunities on street corners or along undeveloped street right-of-ways, and opportunities on private or underutilized (vacant) property, provide great opportunities for recreation and open space.

Community organizing around engaged urban revitalization, such as the creation of parks and open space, can have tangible social benefits too. It fosters a sense of responsibility, and encourages residents to take initiative in affecting their own environment. Creation of a community space can support the coming together of a neighborhood,

facilitating social interactions and further increasing participation in future planning efforts.

The City should look for opportunities to expand the development of street parks, urban plazas, community gardens, improved streets, and shared school playfields (as described in Objective 3). An evaluation of public property potential, vacant and underutilized properties, and even private property where agreements with owners could be facilitated, would aid in identifying open space opportunities. While gaining access to private property is often a challenge, as owners may want to preserve development potential in the future, it may be possible to structure conditions that allow for temporary use as open space. A formal authorization agreement between the property owner, City, and community could regulate limited-term public use, allowing vacant private properties to serve as a positive community asset without detriment to existing or future building rights.

The City should support community-initiated efforts both administratively and financially by promoting and expanding programs like the Community Challenge Grants and Community Opportunity Fund. The City should also broaden communities' awareness of ways to develop or improve their own neighborhood spaces, the need for open space, and opportunities for them to respond to such needs. Education programs, which can be held in schools, within nonprofit programs, or even as seminars at neighborhood organizations, allow residents to tap into strategies for designating, financing and developing urban open space.

Various nonprofit organizations already provide technical assistance and support, broadening knowledge about what communities can do; organizing seminars, which aid community groups in understanding how to get a project started; providing planting lists and advice on their websites; and holding volunteer days to help implement work. Communities may also have physical needs for maintenance support and tools. Tool lending libraries that assist park volunteers in cleanups, landscape improvements, and community tree plantings, all help support the development of open space and should be supported.

POLICY 5.4

Reduce governmental barriers to community-initiated recreation and open space efforts.

The high cost of permitting requirements, combined with the time to complete them, can be a significant

disincentive to community efforts. Recognizing this, San Francisco's street regulating agencies have streamlined permitting processes for street landscaping and reduced fee requirements. However, significant hurdles still exist to creating major changes to properties or to the public right-of-way. Because of the potential for conflicts with parking, traffic, transit, and adjacent uses, it is difficult to streamline major improvement processes. Yet, Portland has established a model ordinance, the "Intersection Repair" ordinance, which was intended to facilitate neighborhood improvements to streets, including major interventions like developing public gathering places in a street intersection. The City should study how to improve the delivery of public street improvements, and examine the lessons from places like Portland to examine what aspects can be facilitated.

Liability is another barrier. In San Francisco, improvements that convert private property to publicly accessible, or even private improvements to public property, typically require that the party contributing the improvements indemnify the City of all liability, which can bring the additional financial burden of insurance. The City needs to make a concerted effort to limit such liability concerns, and balance good public policy with legal caution. In particular, the City should pursue legislation to address the issue of public liability in situations of joint use or joint development of public properties, so that the liability may be equitably shared by multiple agencies (such as the agreement between the SFUSD and the Recreation and Park Department to allow public access to some schoolyards).

POLICY 5.5

Encourage and foster stewardship of open spaces through well-run, active volunteer programs.

Individual participation in stewardship of public open spaces brings obvious improvements to our parks – greener plantings, better maintenance, and an overall feeling of ownership which can deter destructive behavior. Stewardship activities also provide benefits for the individuals by encouraging appreciation of the space, stimulating more outdoor activity, and promoting long-term civic engagement.

The SFRPD has a wide-ranging volunteer program which creates opportunities to participate in gardening and

ecological restoration projects, recreational programming, park planning, and fundraising. The program also fosters group sponsorship through weekly, ongoing work parties that provide ongoing stewardship of a park or area.

The Department of Public Works runs a number of parallel programs, such as Adopt A Street, Streets Park Program, and the Community Clean Team, to facilitate neighborhood stewardship efforts on San Francisco's streets, parks and schools.

The Port has also developed successful partnerships with organizations (like Literacy for Environmental Justice to assist with maintenance and education at Heron's Head Park), and Kayaks Unlimited (for stewardship of Islais Landing).

But more resources are necessary to realize the full potential of volunteer programs, expanding the breadth and depth of volunteer opportunities as well as overall participation rates. The City should work to expand these partnerships for stewardship of parks and open spaces, and could help coordinate all volunteer opportunities – whether City or nonprofit sponsored – into an online, easy-to-access calendar, or create a volunteer database with up-to-date schedules and opportunities. The City should also explore ways to share ongoing maintenance of parks and open spaces with individual stewardship organizations or through inter-departmental coordination.

OBJECTIVE 6

SECURE LONG-TERM RESOURCES AND MANAGEMENT FOR OPEN SPACE ACQUISITION, AND RENOVATION, OPERATIONS, AND MAINTENANCE OF RECREATIONAL FACILITIES AND OPEN SPACE

Securing resources for the maintenance and renovation of existing open spaces and providing funding for the acquisition of new open spaces has been a challenge for the City. The City must recognize the costs associated with open space maintenance, renovation, and acquisition and ensure that their funding mechanisms address these major expenditures.

POLICY 6.1**Pursue and develop innovative long-term funding mechanisms for maintenance, operation, renovation and acquisition of open space and recreation.**

One of the key goals of this Plan is to ensure that the policies and programs have adequate resources and that a consistent source of funding for operations and maintenance is secured. The City has the responsibility to provide necessary funding for well-maintained recreational facilities and open space. To overcome the challenge of the City's diminishing resources and increasing costs and in order to meet existing funding challenges, the City should pursue different innovative financing mechanisms. These strategies should help the City realize the monetary benefits provided by parks and open space and invest those benefits into the park system. The City should continue to pursue sustainable mechanisms to overcome the funding challenges. Below is a list of different mechanisms commonly used in cities as public finance strategies for parks and open spaces. Many of these funding strategies have been already used in San Francisco. The City should evaluate these mechanisms and their effectiveness on an on-going basis.

- **General Obligation bonds:** RPD has been using general obligation bonds as a long-term capital planning strategy. These bonds focus on the basic, critical needs of the park system, reducing earthquake safety risks and renovating rundown parks, pools, recreation centers, and playgrounds. In order to ensure that each bond efficiently addresses the needs of communities, RPD should continue to assess the results of each bond and their cost-efficiency in order to enhance the structure, process, and efficiency of future bonds.
- **Public-private partnerships:** The City has used public private partnerships since the park system was founded. Support from private entities and individuals can enable the park system to provide services and recreation opportunities to San Franciscans. The City is continuing to develop public-private partnerships to increase open space amenities and funding opportunities. Such facilities can range from mobile food vendors to larger concessions operating in park facilities. Such opportunities can provide a reliable source of funding for park improvements and maintenance, while ensuring that they benefit park users, address their needs and concerns, and protect the public interest. Responsible agencies should develop

these opportunities through an appropriate outreach and engagement process as outlined in Objective 5. Additionally, these agreements should:

- Maintain and enhance public access to recreation and park services; and
 - Maintain transparency and accountability to the public; and
 - Support the park or open space through financial and/or physical improvements
- **Grants:** Granting agencies such as federal and state agencies and foundations provide innumerable financial help and support to the city. The city agencies should continue to proactively pursue grant opportunities.
 - **Local Fundraising:** The City's vast network for park groups and active community organizations provide a wealth of knowledge and resources that can help support the city's open spaces. The City Budget should prioritize adequate resources and consistent funding source for operating and maintaining open space.
 - **Citywide Impact Fees to Fund Recreation Facilities and Open Space.** Development impact fees are fees the City charges developers in connection with approval of a development project for the purpose of defraying all or a portion of new public facility needs related to the development. These fees can be used to acquire and develop new recreational facilities and open spaces and for capital improvements to existing open spaces. Development impact fees that provide revenue for recreation and open space are in effect in a number of City neighborhoods, but not citywide. The City has developed an initial nexus study to demonstrate the impact of new development on open space.
 - **Park Improvement Districts.** An innovative approach, similar to the Community Benefits District (CBD) used in many of San Francisco's neighborhood commercial districts, is a Park Improvement District. A Park Improvement District is a public-private partnership in which businesses and/or residents in a defined area elect to pay an additional tax in order to fund improvements and maintenance for the park. The parks are maintained by the City, but this additional funding provides supplemental funds to cover needed improvements and maintenance overseen by a neighborhood-elected board

of directors. This concept could be piloted to determine its effectiveness.

- **Voluntary Contributions.** Many cities provide the option to voluntarily contribute a small amount of money specifically earmarked for open space. Such a contribution option would be added to residents' utility bills to fund improvements to open space.
- **Tax Revenue Options.** In some cities, decision makers have pursued the option of an additional tax contribution earmarked for open space, usually via an additional property tax on residential and/or commercial owners. The creation of a new tax requires a two-thirds majority vote by the electorate and provides a consistent source of funding. The money can be used for acquisition, maintenance, or capital improvements.
- **Community Facilities Districts.** In Mission Bay and Hunters Point Shipyard, Community Facilities Districts (or CFD), or special tax districts, will be used to help fund the on-going maintenance of the new open space facilities. The South Beach area also has a CFD that helps fund the maintenance of some small public plazas.

RPD and other public agencies responsible for recreation and open space in the City should continue analyzing how such funding options could be applied in San Francisco for recreation and open space maintenance, operations, renovation and acquisitions.

RON MIGUEL

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10 June 2014

San Francisco Board of Supervisors
Land Use and Economic Development Committee
c/o Angela Calvillo, Clerk of the Board
1 Dr. Carlton B. Goodlett Place, Rm. 244
San Francisco, CA 94102

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RECEIVED
BOARD OF SUPERVISORS
SAN FRANCISCO

2014 JUN 10 PM 2:51

AK

RE: File No. 140413 - *land use* General Plan - Recreational and Open Space Element - 6/16/14 hearing

Supervisors Weiner, Kim, and Cohen:

There are two areas of the current Recreational and Open Space Element which are not sufficiently fleshed out so as to assure procedures which will serve the citizens of our city in an efficient manner. The following suggestions address these areas. Although I realize that the Element is a high-level policy document - it can and should contain specific procedures which assure the public that those policies are implemented.

[from the Element] *The Neighborhoods* -- Several areas throughout the City may experience substantial new housing development in the future.

Following this statement there are no Procedures noted that require interaction with the Planning Department in order to utilize the available statistics as to the number of new units currently in production, in the pipeline, and anticipated from the Association of Bay Area Governments (ABAG). In addition, the density anticipated by current Area Plans and the adequacy of designated open space must be considered. This interaction between city departments is essential to good government.

[from the Element] **OBJECTIVE 4 - PROVIDE OPPORTUNITIES FOR RECREATION AND THE ENJOYMENT OF THE OPEN SPACE IN EVERY SAN FRANCISCO NEIGHBORHOOD**

POLICY 4.1 - Make Better use of existing facilities. All public open space and recreation facilities should be adequately maintained and staffed so that they can meet standards which ensure maximum use. Such standards should specify optimal levels of staff, safety, maintenance, coordination and information. Other relevant factors and the exact levels of adequacy for each standard should be determined by the Recreation and Park Department.

In order to conceptualize and effectively engage this Objective and this Policy certain statistical information is essential but currently unavailable. Specifically: the actual usage of each park, recreation facility, and program; and the actual cost of each park, recreation facility, and program. Although these numbers should never be the sole determining factors, they would provide a statistical array which is currently unavailable to the Department, the Commission, or the public. A policy directive requiring an accounting program (possibly created in conjunction with Harvey Rose's office) would provide some indication of the Department's range and effectiveness in fulfilling its mission.

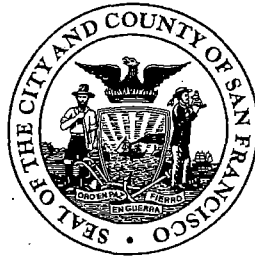
Thank you,


Ron Miguel

Past Chair, Recreation & Open Space Advisory Committee

2799

BOARD of SUPERVISORS



City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco 94102-4689
Tel. No. 554-5184
Fax No. 554-5163
TDD/TTY No. 554-5227

NOTICE OF PUBLIC HEARING

BOARD OF SUPERVISORS OF THE CITY AND COUNTY OF SAN FRANCISCO LAND USE AND ECONOMIC DEVELOPMENT COMMITTEE

NOTICE IS HEREBY GIVEN THAT the Land Use and Economic Development Committee will hold a public hearing to consider the following proposal and said public hearing will be held as follows, at which time all interested parties may attend and be heard:

- Date:** Monday, June 16, 2014
- Time:** 1:30 p.m.
- Location:** Committee Room 263, located at City Hall
1 Dr. Carlton B. Goodlett Place, San Francisco, CA
- Subject:** File No. 140413. Ordinance amending the General Plan by updating the Recreational and Open Space Element of the General Plan; making findings, including environmental findings, and findings of consistency with the General Plan, and the eight priority policies of the Planning Code, Section 101.1.

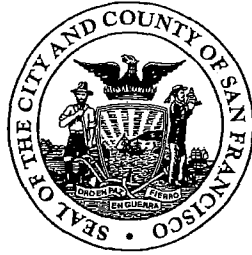
In accordance with San Francisco Administrative Code, Section 67.7-1, persons who are unable to attend the hearing on this matter may submit written comments to the City prior to the time the hearing begins. These comments will be made a part of the official public record in this matter, and shall be brought to the attention of the members of the Committee. Written comments should be addressed to Angela Calvillo, Clerk of the Board, Room 244, City Hall, 1 Dr. Carlton Goodlett Place, San Francisco, CA 94102. Information relating to this matter is available in the Office of the Clerk of the Board. Agenda information relating to this matter will be available for public review on Friday, June 13, 2014.

A handwritten signature in black ink, appearing to read "Angela Calvillo".

Angela Calvillo, Clerk of the Board

DATED: June 4, 2014
MAILED/POSTED: June 6, 2014
PUBLISHED: June 6, 2014

BOARD of SUPERVISORS



City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
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TDD/TTY No. 544-5227

**LAND USE & ECONOMIC DEVELOPMENT COMMITTEE
NOTICE REVIEW**

Legislative File No. 140413
Notice Type General Plan - Amendments Related to the 2014 Update of
the Recreation and Open Space Element

Initial:

AA

Initial:

L.W. R

Date:

June 2, 2014

"gianli1018@sohu.com"; "rashidrashid@me.com"; "reckert@toast.net"; "redbuck31@gmail.com"; "reddog31@gmail.com"; "richard@pellegrienterprise.com"; "richard@woonlaw.com"; "robnicolo@gmail.com"; "roxana.macovei@gmail.com"; "rrabbitt@fbm.com"; "rraphy@aol.com"; "rupert.clayton@gmail.com"; "sahiti@sfparksalliance.org"; "samtous@gmail.com"; "sconger@citgo.com"; "sd@deroseappelbaum.com"; "sebraleaves@gmail.com"; "serglo@nibbi.com"; "sf_district6@yahoo.com"; "sfiberk@mac.com"; "sfommra@gmail.com"; "sfplanning@masonkirby.com"; "shannagolden124@gmail.com"; "smoos@bionidlandscape.com"; "Sopooohxo@yahoo.com"; "supermica@gmail.com"; "tcv@cpdb.com"; "tedv@dpr.com"; "teri.nuebel@mgrc.com"; "tyler@sfbike.org"; "wcowles@bararch.com"; "webadmin@blockbrief.com"; "winstonc@aol.com"; "yrret1944@aol.com"; "zionwoods@yahoo.com"

Subject: NOTICE - General Plan - Amendments Related to the 2014 Update of the Recreation and Open Space Element
Date: Thursday, June 05, 2014 5:07:00 PM
Attachments: [image001.png](#)
[20140605083446618.pdf](#)

NOTICE OF PUBLIC HEARING

BOARD OF SUPERVISORS OF THE CITY AND COUNTY OF SAN FRANCISCO LAND USE AND ECONOMIC DEVELOPMENT COMMITTEE

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Best,

Andrea S. Ausberry

Assistant Clerk
Land Use and Economic Development Committee
San Francisco Board of Supervisors

From:
Bcc:

Ausberry, Andrea


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NOTICE OF PUBLIC HEARING BOARD OF SUPERVISORS OF THE CITY AND COUNTY OF SAN FRANCISCO LAND USE AND ECONOMIC DEVELOPMENT COMMITTEE

JUNE 16, 2014 - 1:30 P.M. COMMITTEE ROOM 263, CITY HALL 1 DR. CARLTON B. GOODLETT PLACE, SAN FRANCISCO, CA

NOTICE IS HEREBYGIVEN THAT the Land Use and Economic Development Committee will hold a public hearing to consider the following proposal and said public hearing will be held as follows, at which time all interested parties may attend and be heard: File No. 140413. Ordinance amending the General Plan by updating the Recreational and Open Space Element of the General Plan; making findings, including environmental findings, and findings of consistency with the General Plan, and the eight priority policies of the Planning Code, Section 101.1. In accordance with San Francisco Administrative Code, Section 67.7-1, persons who are unable to attend the hearing on this matter may submit written comments to the City prior to the time the hearing begins. These comments will be made a part of the official public record in this matter, and shall be brought to

the attention of the members of the Committee. Written comments should be addressed to Angela Calvillo, Clerk of the Board, Room 244, City Hall, 1 Dr. Carlton Goodlett Place, San Francisco, CA 94102. Information relating to this matter is available in the Office of the Clerk of the Board. Agenda information relating to this matter will be available for public review on Friday, June 13, 2014. Angela Calvillo, Clerk of the Board

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NOTICE OF PUBLIC HEARING
BOARD OF SUPERVISORS OF THE
CITY AND COUNTY OF SAN FRAN-
CISCO LAND USE AND ECONOMIC
DEVELOPMENT COMMITTEE
JUNE 16, 2014 - 1:30 P.M. COMMIT-
TEE ROOM 263, CITY HALL 1 DR.
CARLTON B. GOODLETT PLACE,
SAN FRANCISCO, CA

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BOARD of SUPERVISORS



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Fax No. 554-5163
TDD/TTY No. 554-5227

MEMORANDUM

TO: John Rahaim, Director, Planning Department
Jonan Ionin, Acting Commission Secretary, Planning Commission
Phil Ginsburg, General Manager, Recreation and Parks Department

FROM: Andrea Ausberry, Assistant Clerk, Land Use and Economic Development
Committee, Board of Supervisors

DATE: May 21, 2014

SUBJECT: LEGISLATION INTRODUCED

The Board of Supervisors' Land Use and Economic Development Committee has received the following proposed legislation, introduced by the Planning Commission on May 6, 2014:

File No. 140413

Ordinance amending the General Plan by updating the Recreational and Open Space Element of the General Plan; making findings, including environmental findings, and findings of consistency with the General Plan, and the eight priority policies of the Planning Code, Section 101.1.

If you have any additional comments or reports to be included with the file, please forward them to me at the Board of Supervisors, City Hall, Room 244, 1 Dr. Carlton B. Goodlett Place, San Francisco, CA 94102.

c: AnMarie Rodgers, Planning Department
Aaron Starr, Planning Department
Sarah Ballard, Recreation and Parks Department
Margaret McArthur, Recreation and Parks Commission



**SAN FRANCISCO
PLANNING DEPARTMENT**

RECREATION & OPEN SPACE ELEMENT

FINAL DRAFT: MARCH 2014

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

Part 1: Individual Comments

Alice Rogers – January 20, 2014

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

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

High Needs Areas

Comment highlights

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

Department Response

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

From: [Alice Rogers](#)
To: [Haddadan, Kimia](#)
Cc: [Jamie Whitaker](#); [Kim, Jane](#); [Angulo, Sunny](#); [Toby Levy](#); [Rachel Norton](#); [Allan Low](#)
Subject: Comments on November 2013 Draft Recreation & Open Space Element
Date: Monday, January 20, 2014 2:39:33 PM
Attachments: [SoMa KidsUnder5 2010CensusData.pdf](#)

20 January, 2014

Kimia Haddadan

San Francisco Planning Department

1650 Mission St. 4th Floor

San Francisco, CA 94103

Re: 2013 Draft ROSE

Dear Ms Haddadan,

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

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

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

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

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

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

Sincerely,
Alice Rogers

.....
Alice Rogers
10 South Park St
Studio 2
San Francisco, CA 94107

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

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

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

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

Biodiversity & natural areas management

Comment highlights

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

Department Response

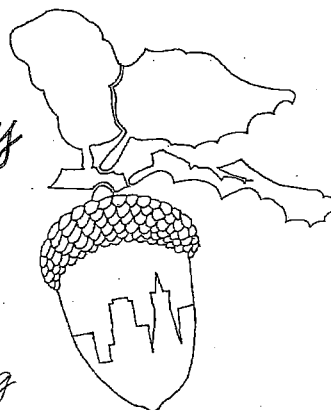
We reordered Policy 4.1 to read "preserve, protect, and restore." In the sentence at the top of page 42 regarding rare/endangered species, we modified the list for accuracy. Policy 4.3 emphasizes that invasive species need to be replaced ("Native and drought-tolerant plants: The City is working to replace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

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

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

Nature in the City

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



January 27, 2014

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

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

Dear Kimia Haddadan,

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

Specifically, we wish to comment on the below:

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

"Building a community of stewardship & eco-literacy to preserve and honor San Francisco's natural legacy."
Nature in the City is a project of Earth Island Institute, a 501(c)3 California nonprofit public benefit corporation.

Nature in the City

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



We also wish to comment more specifically on Policy 4.1

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

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

Sincerely,

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

Amber Hasselbring, Executive Director

Anastasia Gilkshtern – January 6, 2014

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

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

Biodiversity & natural areas management

Comment highlights

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

Department Response

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

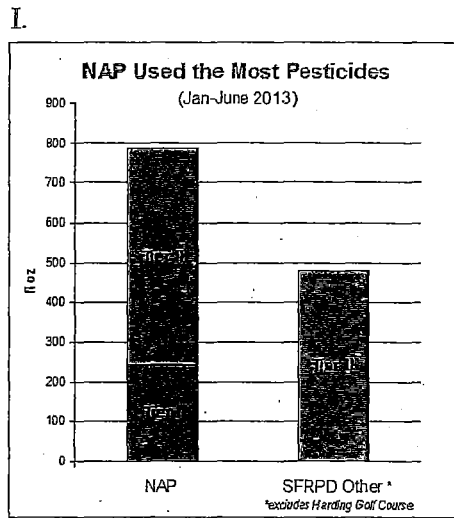
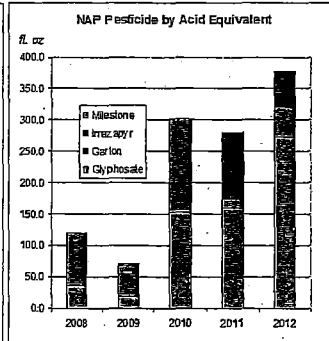
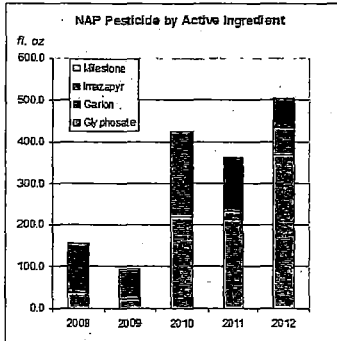
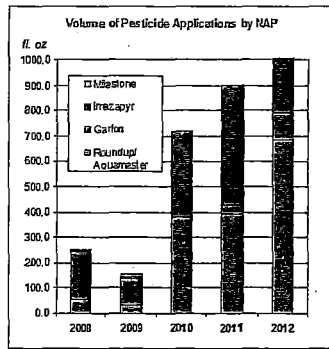
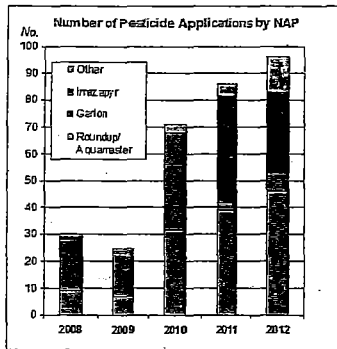
While an outright ban of herbicides goes beyond the scope of this plan, we have made edits to Objective 4 to emphasize the need for a balanced approach to habitat management that prioritizes holistic ecosystem health and resiliency. Policy 3.6 also cites the City's draft Urban Forest Plan, which will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

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

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

A Flora of San Francisco, 1958 by John Thomas Howell

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



The San Francisco Recreation and Park Department uses very toxic - tier I & II - herbicides in our parks. There are epidemiological links to several cancers including **prostate**,

non-Hodgkin lymphoma, leukemia, multiple myeloma, and breast cancer. More and more non-industry-funded scientists are finding links between these chemical and all sorts of problems, including **cell death, birth defects, miscarriage, low sperm counts, DNA damage, and destruction of gut bacteria.** The Natural Areas Program (NAP) is the worst offender.

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

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

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

Routinely used by RPD/NAP are:

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

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

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

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

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

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

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

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

II.

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

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

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

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

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

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

III.

What is “native”?

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

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

Sincerely,

Anastasia Glikshtern
150 Chaves Ave.
San Francisco, CA 94127

Arthur Feinstein, Sierra Club – January 27, 2014

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

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

Biodiversity & natural areas management

Comment highlights

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

Department Response

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

Recreation (and Open Space)

Comment highlights

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

Department Response

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

Public-private partnerships

Comment highlights

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

Department Response

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

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

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



San Francisco Group

January 27, 2014

Kimia Haddadan

San Francisco Planning Department

1650 Mission St. 4th Floor

San Francisco, CA 94103."

Sent by email to:
Kimia.Haddadan@sfgov.org

RE:

Dear Ms. Haddadan:

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

Our comments are brief.

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

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

to comments, pg. 27)"

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

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

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

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

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

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

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

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

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

Thank you for your attention to our concerns.

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

Cami Bowles – January 24, 2014

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

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

Preservation of open space

Comment highlights

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

Department Response

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

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

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

Golden Gate Park Master Plan

Comment highlights

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

Department Response

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

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

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

January 24, 2014

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

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

Ms. Haddadan:

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

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

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

Thank you for your consideration.

Carmi Bowles

1451 44 Avenue San Francisco, CA 94122

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

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

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

Biodiversity & natural areas management

Comment highlights

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

Department Response

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

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

A Flora of San Francisco, 1958 by John Thomas Howell

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

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

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

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



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

January 22, 2014

Via Email (kimia.haddadan@sfgov.org)

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

Re: Draft Recreation and Open Space Element

Dear Ms. Haddadan:

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

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

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

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

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

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

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

Very truly yours,

Carolyn Johnston

Damien Raffa, Presidio Trust – January 25, 2014

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

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

Other Comments (Environmental Education)

Comment highlights

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

Department Response

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

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

Hi Kimia,

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

POLICY 5.6

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

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

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

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

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

Thanks!

Damien Raffa

Environmental and Outdoor Education Program Manager

Presidio Trust

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

Dee Seligman – January 30, 2014

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

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

Biodiversity & natural areas management

Comment highlights

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

Department Response

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

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

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

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

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

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

Definition of native

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

Habitat

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

Remnants of pre-existing landscapes

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

Sustainability

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

Biodiversity

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

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

Sincerely,

Dee Seligman, Ph.D.

2094 Fell St.

San Francisco, CA 94117

Denise Louie – January 11 and 25, 2014

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

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

Park Funding

Comment highlights

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

Department Response

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

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

Golden Gate Park Master Plan

Comment highlights

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

Department Response

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

Biodiversity & natural areas management

Comment highlights

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

Department Response

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

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

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

Other Comments (Maintenance)

Comment highlights

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

Department Response

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Hi Kimia,

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

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

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

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

Thanks for listening.
Denise Louie

Diane Eisenberg – January 24, 2014

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

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

Recreation

Comment highlights

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

Department Response

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

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

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

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

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

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

Hello Diane,

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

Cheers,

Joshua Switzky

Acting Director of Citywide Planning

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

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

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

Dear Mr. Switzky:

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

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

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

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

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

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

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

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

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

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

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

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

Thank you for your time and consideration.

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

Eugene Bachmanov – January 22, 2014

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

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

Biodiversity & natural areas management

Comment highlights

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

Department Response

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

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

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

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

A Flora of San Francisco, 1958 by John Thomas Howell

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

From: Eugene Bachmanov
To: Haddadan, Kimia
Date: Wednesday, January 22, 2014 5:49:23 PM

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

Dear Ms. Haddadan,

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

1.

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

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

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

2.

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

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

3.

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

NAP/RPD constantly uses:

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

Here is a partial description of harmful effects.

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

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

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

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

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

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

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

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

Evelyn Manies – January 22, 2014

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

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

Preservation of open space

Comment highlights

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

Department Response

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

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

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

Golden Gate Park Master Plan

Comment highlights

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

Department Response

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

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

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

January 22, 2014

Ms. Kimia Haddadan

Planning Department

1650 Mission Street, 4th floor, SF CA 94103

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

Ms. Haddadan:

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

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

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

Thank you for your consideration.

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

emanies@gmail.com

cc: Planning Commission
Historic Preservation Commission

Gail Wechsler – January 27, 2014

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

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

Biodiversity & natural areas management

Comment highlights

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

Department Response

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

From: Gail Wechsler
To: Haddadan, Kimja
Subject: ROSE comment
Date: Monday, January 27, 2014 4:59:01 PM

Dear Ms. Haddadan:

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

Thank you for the opportunity to comment.

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

Greg Gaar – January 23, 2014

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

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

Biodiversity & natural areas management

Comment highlights

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

Department Response

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

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

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

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

Policy 2.10

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

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

Policy 4.3

Native and Drought Tolerant Plants

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

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

Thanks
Greg Gaar
San Francisco

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

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

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

Biodiversity & natural areas management

Comment highlights

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

Department Response

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

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

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

Kimia Haddadan
San Francisco Planning Department
RE: ROSE Objective 4

Ms Haddadan:

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

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

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

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

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

Jake Sigg, Chair
Conservation Committee

BIODIVERSITY

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

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

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

There is no concept of balance between native and non-native in NAP; it is a native-preferred

program. This 2013 ROSE defines "natural area" as "remnants of the historical landscape" (Policy 4.2, page 42). It then directs every city agency to look for

"natural areas" throughout the City and to develop management plans for any that are

found. While NAP is not explicitly stated as the agency that should manage these areas

(an improvement from the 2011 Draft ROSE), it is clear that this 2013 ROSE wants NAP

management policies to be replicated throughout the City in these areas. NAP

management policies include removal of non-native species simply because they are nonnative

(e.g., cutting down 1,600 eucalyptus trees on Mt. Davidson), heavy use of herbicides, and closure of trails. These NAP management policies are becoming

increasingly unpopular as more and more people learn about them. Our concern is that

NAP does not just protect remnants of our historical landscape. It takes large areas with

thriving non-native habitats and destroys them in order to "restore" them with native

plants whether those plants were there historically or not. By equating "natural areas"

with "NAP areas," Policy 4.2 seems to be endorsing this unbalanced approach. Again,

this puts the ROSE in the position of saying there will be no real balance

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

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

November 2013 Revised Draft ROSE Comments -- ROSE Working Group

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

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

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

Jamie Whitaker – January 12 and 14, 2014

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

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

High needs areas

Comment highlights

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

Department Response

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

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

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

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

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

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

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

January 12, 2014

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

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

Subject: Comments on November 2013 Recreation & Open Space Element

Dear Ms. Haddadan,

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

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

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

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

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

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

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

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

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

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

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

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

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

Figure 66. Park Acreage and Rate of Park Acreage Per Resident by Supervisorial District

District	Park Acreage	Number of Residents	Acreage/1,000 Residents
1	967.8	69,548	13.92
2	1740.7	69,606	25.01
3	30.2	70,638	0.43
4	131.5	72,489	1.81
5	263.7	74,764	3.53
6	12.2	73,665	0.17
7	870.9	72,918	11.94
8	214.3	75,503	2.84
9	217.5	76,723	2.83
10	273.5	72,563	3.77
11	222.5	76,818	2.90
Total	4,944.8	805,235	6.14

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

Sincerely,

Jamie Whitaker

From: [Jamie Whitaker](#)
To: [Haddadan, Kimia](#)
Cc: [Kim, Jane](#); [Angulo, Sunny](#); [Veneracion, April](#); [Rahaim, John](#); [planning@rodnevfong.com](#); [cwu.planning@gmail.com](#); [wordweaver21@aol.com](#); [Gwyneth Borden](#); [richhillissf@yahoo.com](#); [mooreurban@aol.com](#); [hs.commish@yahoo.com](#); [Secretary, Commissions](#); [Commission, Recpark](#); [matt@sfparksalliance.org](#); [Kris Schaeffer](#); [Jim Meko](#)
Subject: Here is some SoMa Census Block mapping for you ... Re: Comments on Draft Nov. 2013 ROSE
Date: Tuesday, January 14, 2014 11:36:12 PM
Attachments: [SoMa KidsUnder5 2010CensusData.pdf](#)

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

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

Thanks,
Jamie Whitaker

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

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

January 12, 2014

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

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

Subject: Comments on November 2013 Recreation & Open Space Element

Dear Ms. Haddadan,

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

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

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

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

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

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

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

- Census Tract data for South of Market needs to be replaced by Census Block data to show the nuances on a Census block-by-block basis. Specifically, the maps of Youth (ages 0-17) and Seniors (ages 65 and Over) on page 26 along with the Population Density map on page 25 would look quite different for SoMa if the Planning Department used Census Block data instead of the Census Tract data which is very diluted by the massive amount of commercial zoned blocks, Transbay/former Freeways/empty lots, and other blocks included in the Census Tracts with zero residential uses.
- A map should be included for population density that includes the 31 construction projects already happening and the many more approved and awaiting start of construction in SoMa because your Housing Pipeline Document already has that information – it is useful for the public and elected leaders to see the map of what we KNOW is getting built and what will likely get built as far as the page 25 Population Density map is concerned.
- Page 9's "Existing Open Space" map of San Francisco paints everything green, including concrete plazas that are "Privately Owned Public Open Spaces" which get used for two things only: workers smoking cigarettes on break and workers socializing /eating. Technically, the public cannot use them on the weekends or at hours other than 8am until 5pm, Monday through Friday. I strongly recommend that a differentiating in the map color scheme is used to denote the POPOSeS – they are not anything near an equivalent to a grassy park/open space in general.
- I've pointed out the Planning Department the gross negligence of ignoring the 600+ kids who spend their summer weekdays in the downtown childcare and day camps at the multiple locations of Bright Horizons Childcare and Marin Day School along with the Embarcadero YMCA. These kids in the daycare centers near their parents' workplaces should be counted in the Page 26 map of Youth (ages 0-17). OR there should be an additional map that shows these populations on a block-by-block basis. To not include this information is misleading, discriminatory, and just plain lazy.
- Going back to the legend for the Page 26 map of Youth (ages 0-17), it stops at "greater than 7.24 youths (ages 0-17) per acre" when Supervisorial District 6 has many building complexes that should appear in a Census Block detailed map (the correct way to present this information for a mixed use area like the SoMa District), and there should be additional ranges ... such as >7.24 and <=15, >15 and <=25, >25 and <=35, and so on.... You cannot have social equity and geographic equity in the ROSE if you do not use Census Block Data and you do

not adjust your ranges to show the true density in population of people, kids, seniors in buildings that the Planning Department approved and knows contains over 1,000 residents in some cases (again, The Infinity complex with One Rincon Hill probably exceeding 1,000 residents once their second tower opens for use).

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

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

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

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

Figure 66. Park Acreage and Rate of Park Acreage Per Resident by Supervisorial District

District	Park Acreage	Number of Residents	Acreage/1,000 Residents
1	967.8	69,548	13.92
2	1740.7	69,606	25.01
3	30.2	70,638	0.43
4	131.5	72,489	1.81
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Total	4,944.8	805,235	6.14

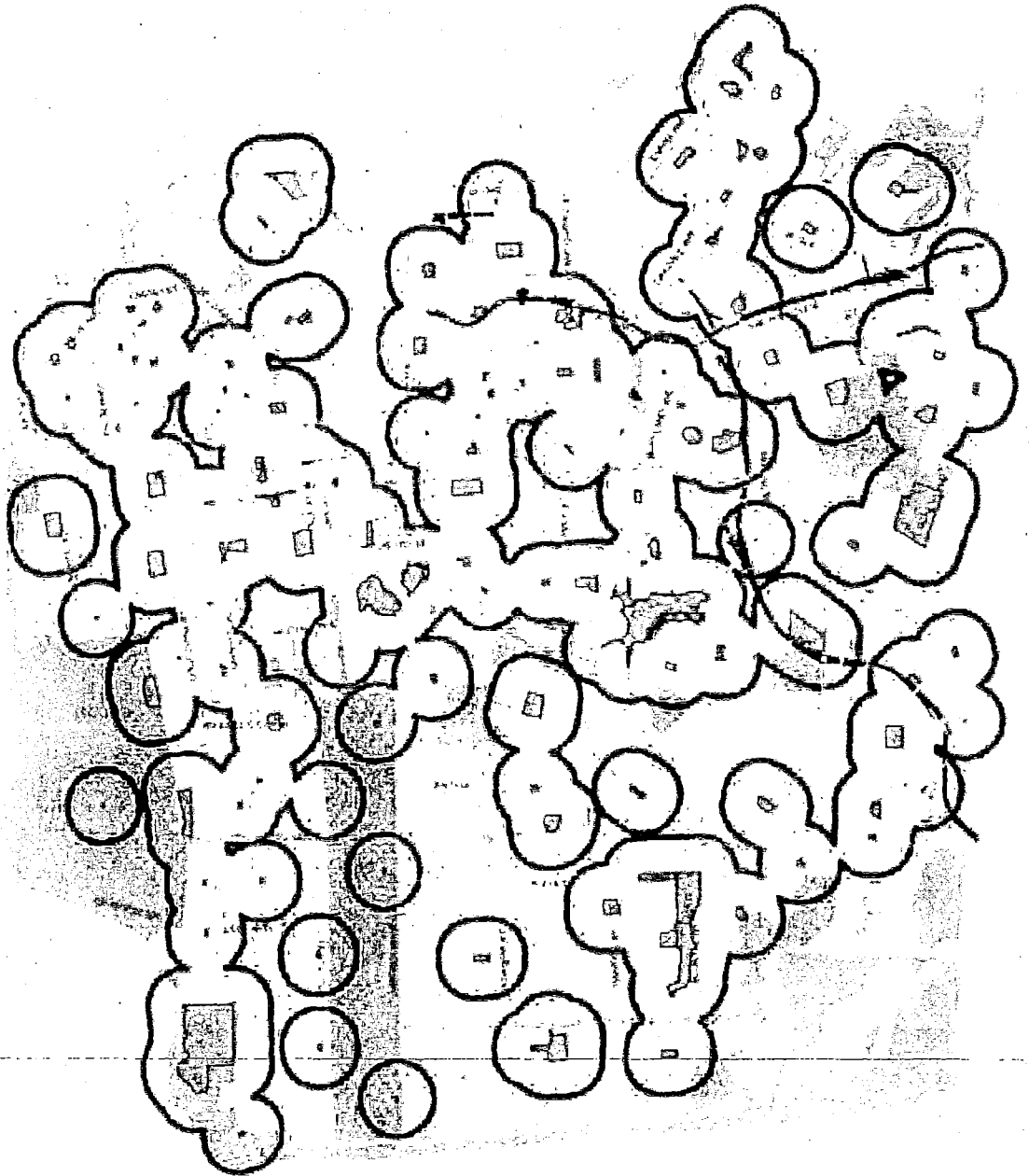
Source: Calculated by the Budget and Legislative Analyst from data provided by the San Francisco Recreation and Parks Department.

Sincerely,

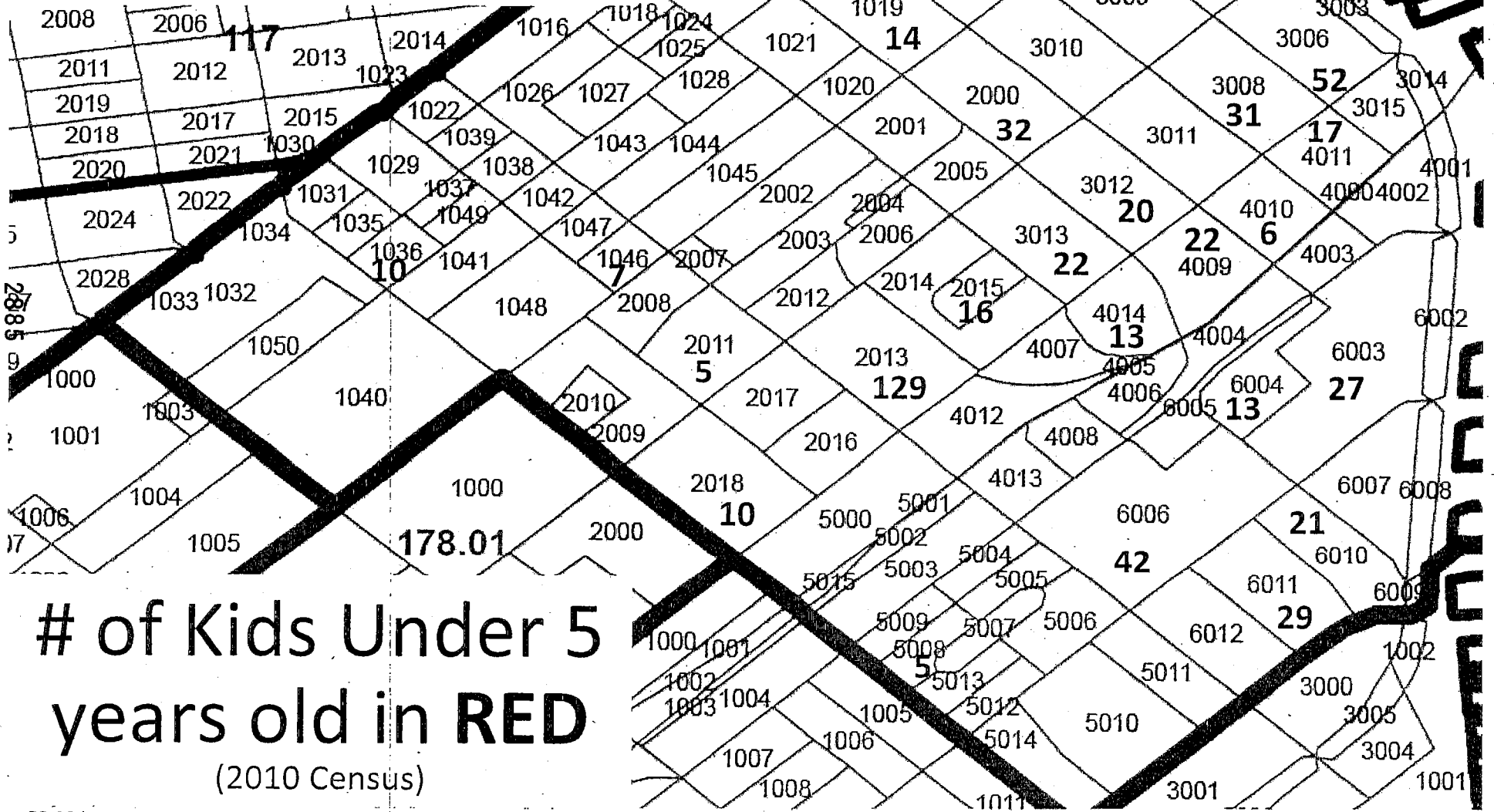
Jamie Whitaker

Playgrounds

0.25 MILE BUFFER



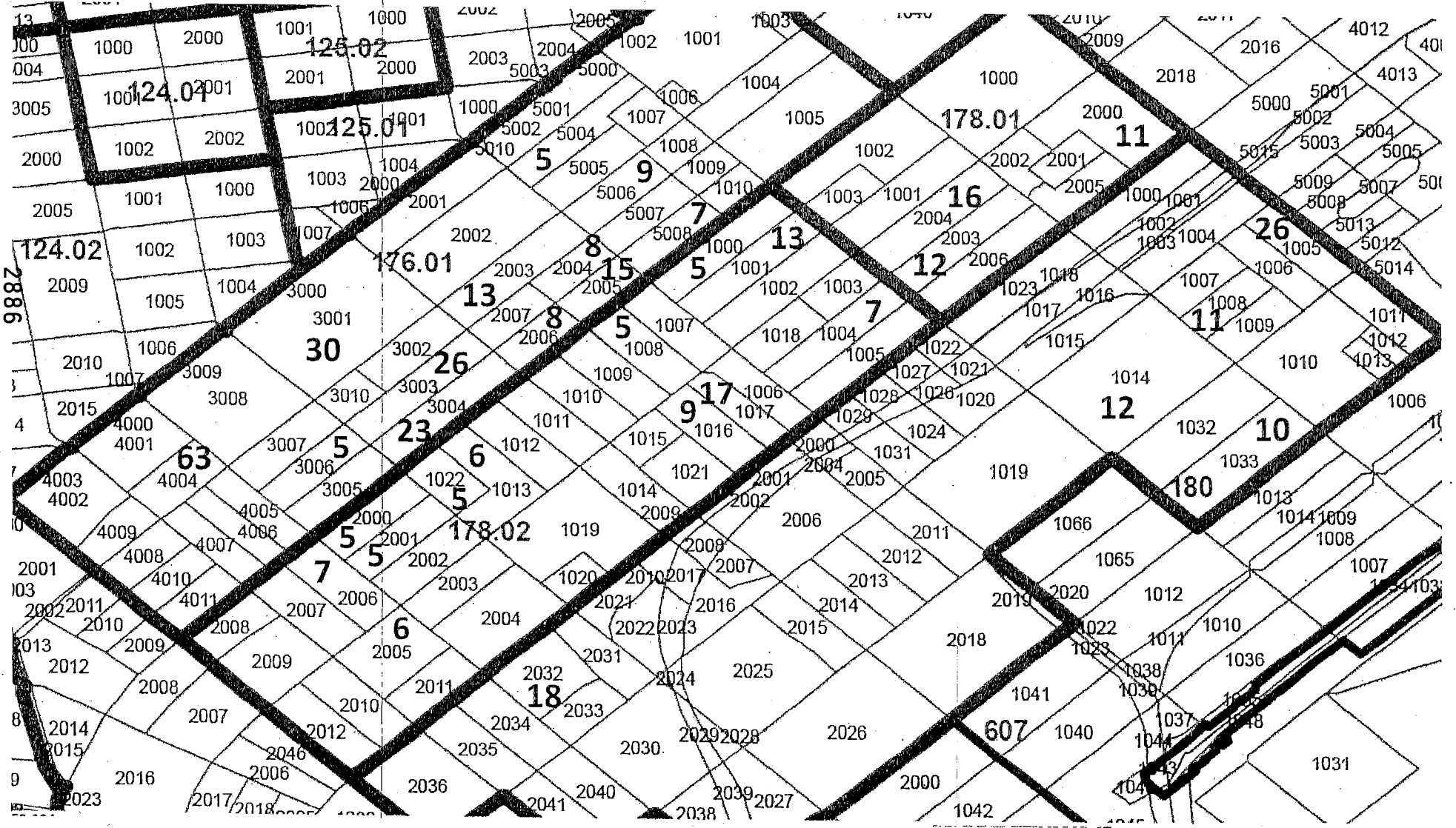
Daycare kids in GREEN (informal 2010 survey)



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

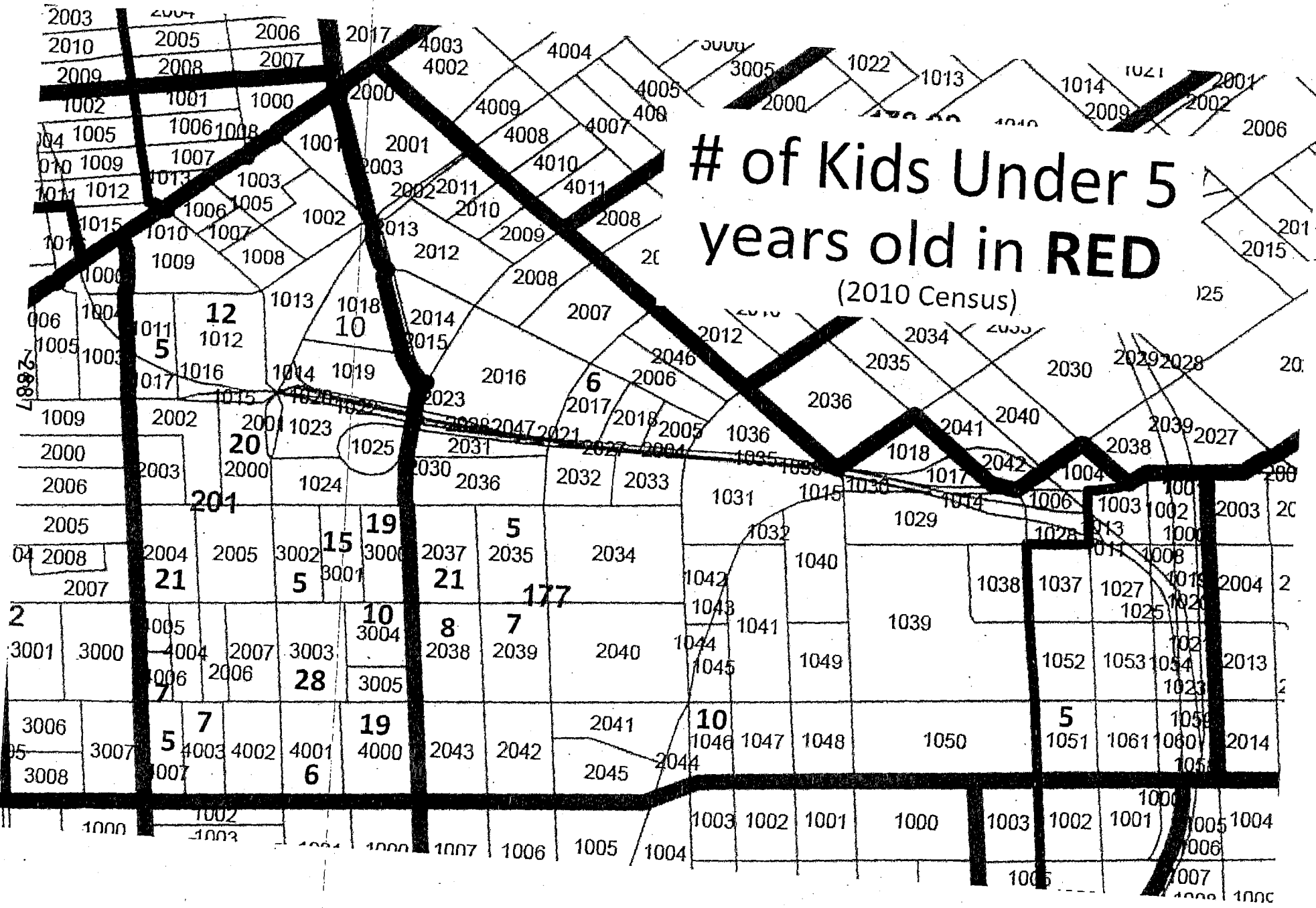
of Kids Under 5 years old in RED

(2010 Census)



of Kids Under 5 years old in RED

(2010 Census)



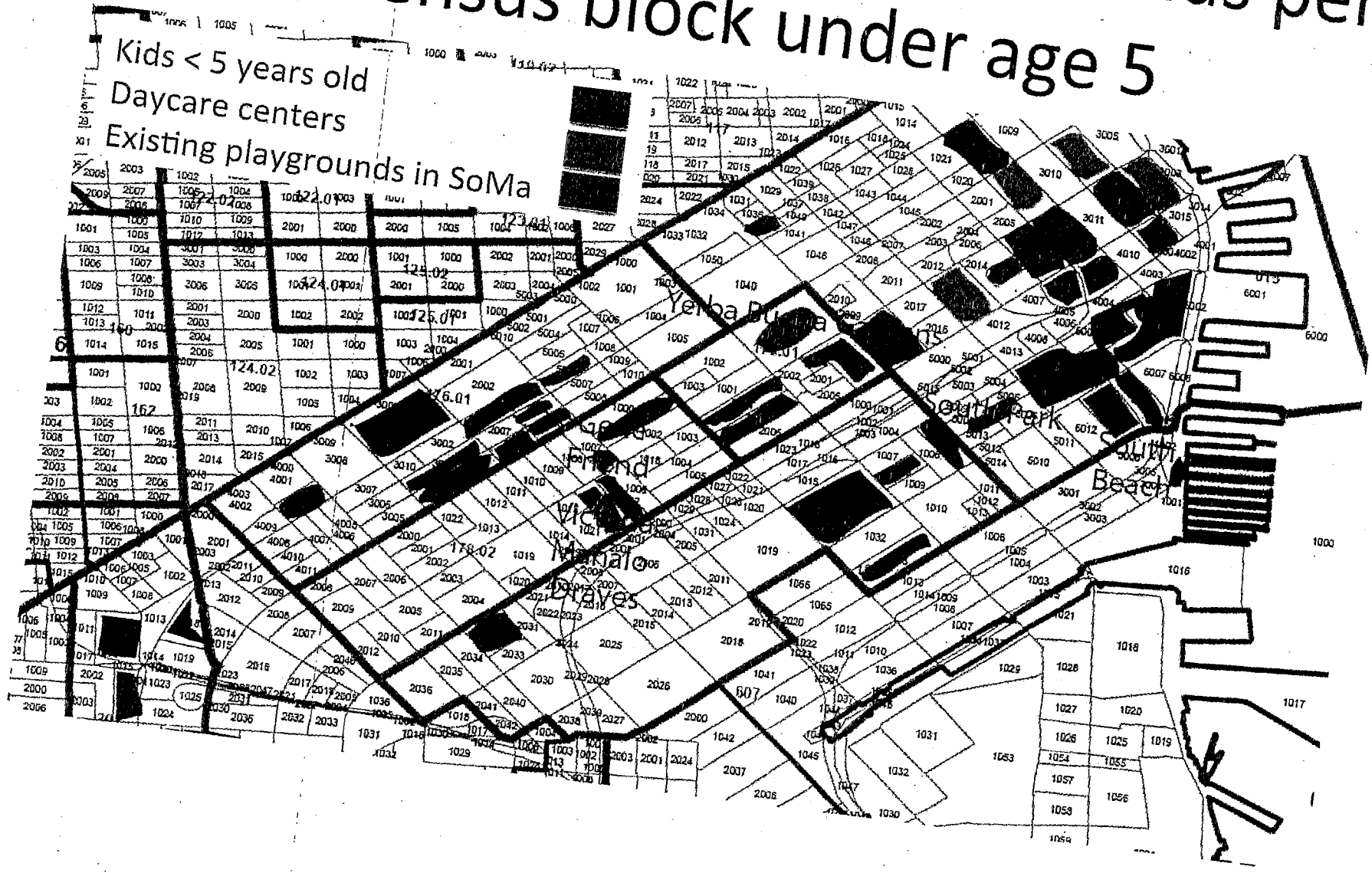
SoMa's Blocks with 5 or more kids per census block under age 5

2888



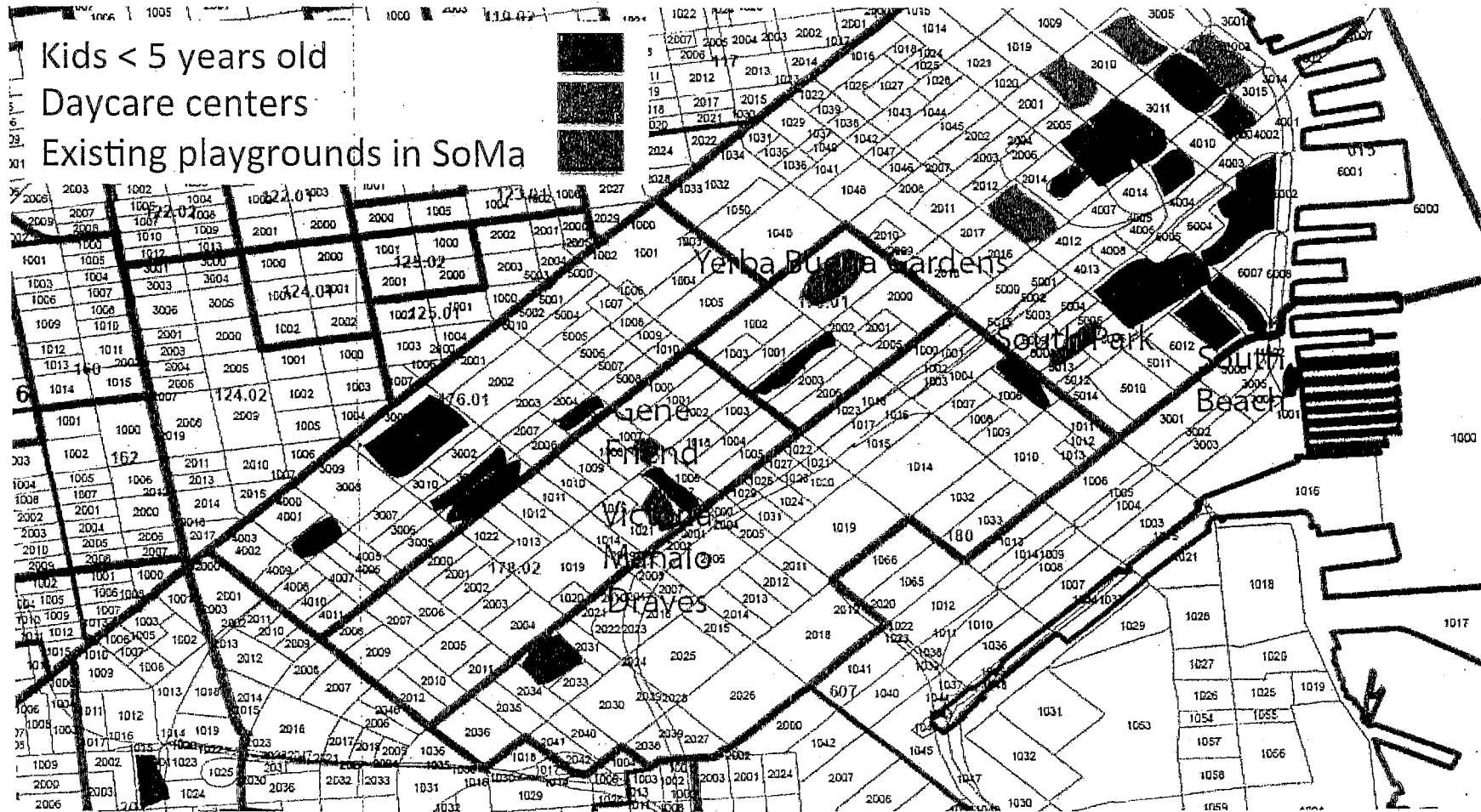
SoMa's Blocks with 8 or more kids per census block under age 5

2889



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

2890

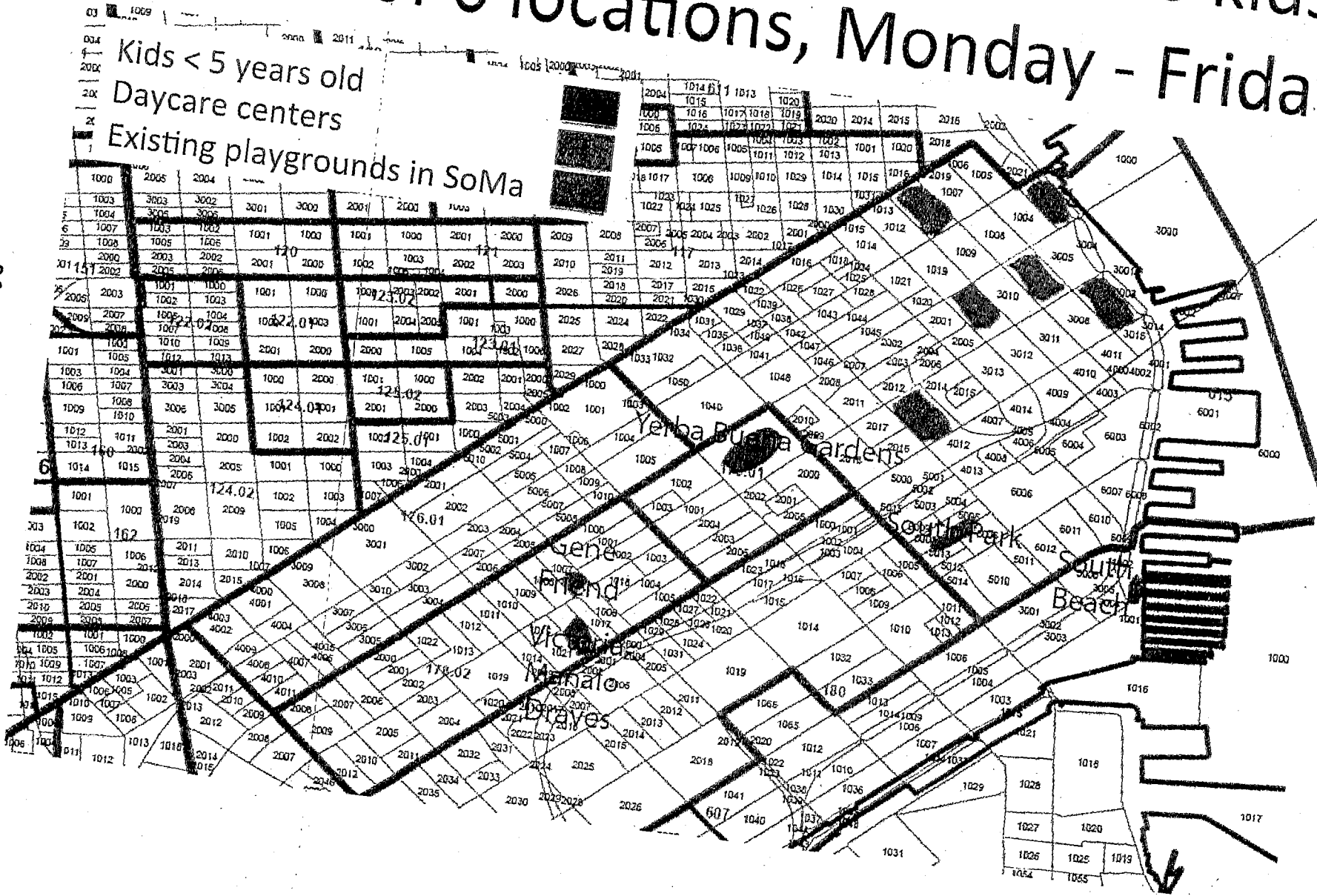


East SoMa Daycares with 32-280 kids in each of 6 locations, Monday - Friday

Kids < 5 years old
Daycare centers

Existing playgrounds in SoMa

2892



DPH's Dr. Rajiv Bhatia has best data analysis in the City on community health items – www.SustainableSF.org

Public Recreation Access Score

Distance weighted recreation access score

High : 100

Low : 0

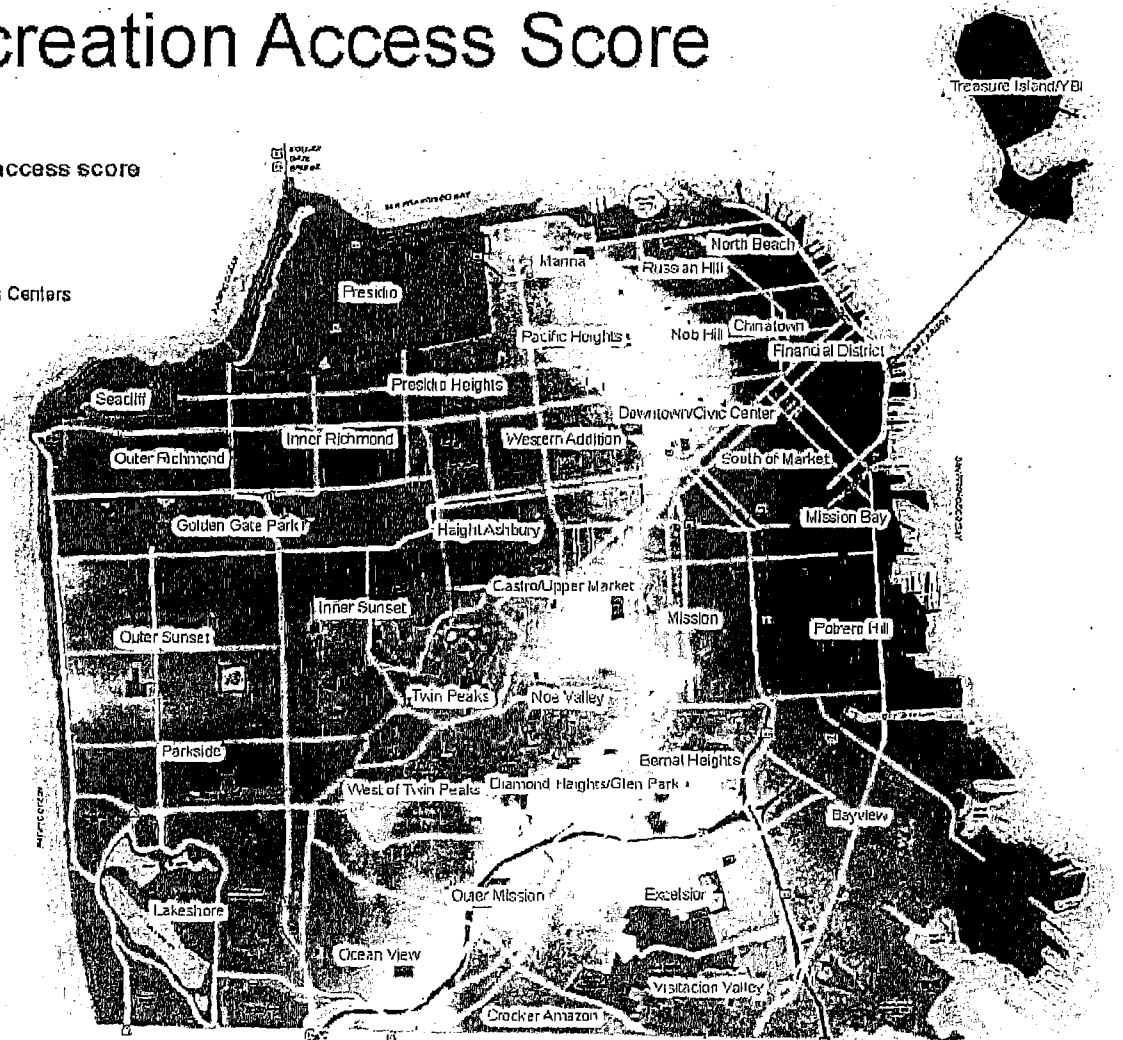
Parks, Open Spaces, and Recreation Centers

0 0.5 1 2 Miles

Source: San Francisco Planning Department, 2011

City and County of San Francisco
Department of Public Health
Environmental Health Section

Available at www.thehdmt.org



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

2894

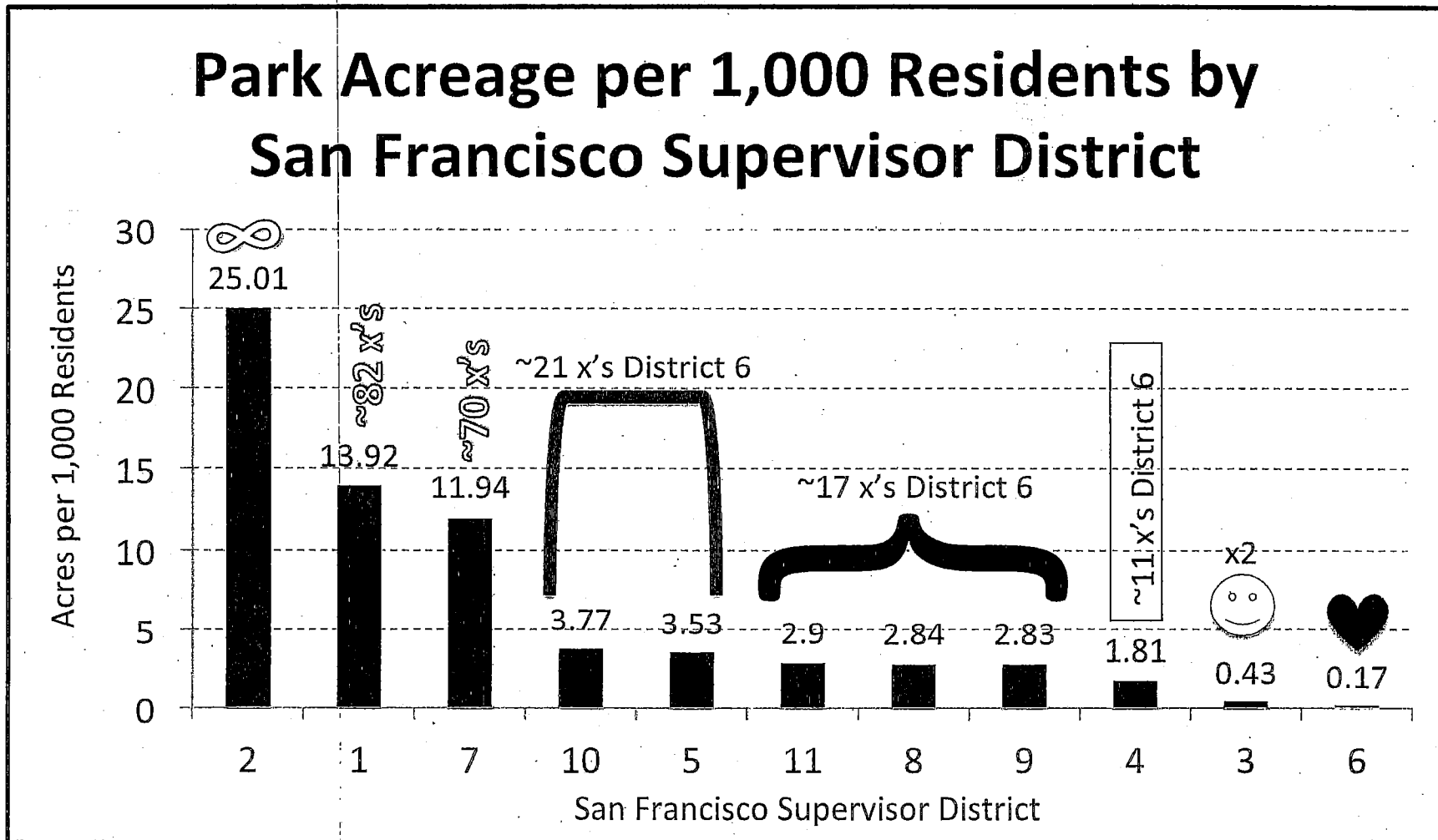
Figure 66. Park Acreage and Rate of Park Acreage Per Resident by Supervisorial District

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Total	4,944.8	805,235	6.14

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

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

2895



Jan Blum – January 24, 2014

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

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

Preservation of Open space

Comment highlights

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

Department Response

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

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

Recreation (and open space)

Comment highlights

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

Department Response

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

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

“Activation” of our parks

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

Department Response

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

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

Golden Gate Park Master Plan

Comment highlights

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

Department Response

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

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

Other Comments (Environmental Education)

Comment highlights

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

Department Response

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

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

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

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

Below are comments which i wish placed in the record:

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

Thank you.

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

Jennifer Clary, San Francisco Tomorrow – February 12, 2014

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

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

Preservation of open space

Comment highlights

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

Department Response

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

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

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

Commercialization of Parks / Park Funding

Comment highlights

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

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

Department Response

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

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

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

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

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

Biodiversity & natural areas management

Comment highlights

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

Department Response

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

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

Golden Gate Park Master Plan

Comment highlights

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

Department Response

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

Park standards

Comment highlights

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

Department Response

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

Other comments (maintenance)

Comment highlights

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

Department Response

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



February 12, 2014

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

Dear Planning Department Staff and Planning Commission

Attention: Kamia Haddadan, Planner

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,

Jennifer Clary

President, San Francisco Tomorrow

Kristina Hansen – January 21, 2014

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

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

Recreation

Comment highlights

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

Department Response

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

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

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

Dear Commissioner:

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

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

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

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

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

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

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

Best,
Kristina Hansen

Liam O'Brien – January 30, 2014

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

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

Biodiversity & natural areas management

Comment highlights

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

Department Response

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

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

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

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

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

The ROSE helps reduce such a history.

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

Thank you,

Liam O'Brien

www.sfbutterfly.com

Sent from my iPhone

Margo Bors – January 24, 2014

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

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

Other Comments (Environmental education)

Comment highlights

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

Department Response

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

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

Good Morning -

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

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

Respectfully,
Margo Bors



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

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

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

Preservation of Open space

Comment highlights

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

Department Response

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

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

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

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

Public Private Partnerships and Commercialization of Parks

Comment highlights

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

Department Response

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

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

Golden Gate Park Master Plan

Comment highlights

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

Department Response

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

Biodiversity & natural areas management

Comment highlights

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

Department Response

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

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

Park Standards

Comment highlights

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

Department Response

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

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

Other comments

Comment highlights

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

Department Response

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

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

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

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

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

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

Dear Mr. Rahaim,

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

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

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

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

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

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

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

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

4. We entirely agree with the Working Group on this subject of so-called "activation". We agree with their words in regard to commercialization and can do no better than to quote the language they developed on this subject in their letter to you, as follows:

The R.O.S.E. "Emphasizes the "city" experience over enjoyment of parkland for its own sake: The frequent use of such words as "activation," and "underutilized," point to an emphasis on our parks becoming another busy, urban experience -- more buildings, more crowds, more planned events, more organized activities, and more commercialization.

Many of our parks just need better maintenance. Magnificent places such as Ocean Beach are already heavily used by San Franciscans who go to the beach to enjoy the lack of urban incursions into the shoreline. Ocean Beach becomes "activated" when the sun comes out! Policy 1.5 and other sections.)

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

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

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

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

can withstand drought and do not need heavy maintenance.

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

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

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

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

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

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

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

Sincerely,

Mary Anne Miller

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

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

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

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

Recreation

Comment highlights

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

Department Response

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

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

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

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

High Needs Areas

Comment highlights

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

Department Response

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

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

POPOS

Comment highlights

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

Department Response

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

Biodiversity and natural areas management

Comment highlights

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

Department Response

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

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

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

Miscellaneous

Comment highlights

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

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

Department Response

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

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

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

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

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

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

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



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January 24, 2014

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

Dear Mr. Rahaim:

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

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

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

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

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

Sincerely,

Matt O'Grady
Executive Director
San Francisco Parks Alliance

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

January 24, 2014

Executive Summary

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

Specific Suggestions

Cover:

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

Introduction:

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

Policy 1.1

- Pg. 9, 1st bullet: "Provide recreational opportunities that respond to user demographics and emerging recreational needs."

- Either in the preface or concluding paragraph, please consider referencing the San Francisco Children's Outdoor Bill of Rights, formally endorsed by the Recreation and Parks Commission in November 2013.

Policy 1.2 and 2.1

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

Policy 1.4

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

Policy 1.5

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

Policy 2.1

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

Policy 2.12

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

Policy 2.4

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

Policy 3.5

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

Policy 3.6

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

Policy 4.1

- Include the caveat 'wherever possible'.

Policy 4.3

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

Policy 5.5

- DPW paragraph should specifically include Street Parks programs.

Policy Issues

Policy 1.1

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

Objective 2 / Introduction

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

Policy 2.4

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

Policy 3.1

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

Objective 5

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

Typos, etc.

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

Appendix

New policy proposed by Parks Policy Council member Damien Raffa:

Policy 5.6

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

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

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

Nancy Wuerfel, former PROSAC member - January 25, 2014

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

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

Preservation of Open space

Comment highlights

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

Department Response

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

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

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

Preservation of Open space

Comment highlights

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

Department Response

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

Biodiversity & natural areas management

Comment highlights

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

Department Response

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

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

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

January 25, 2014

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

Re: 2013 Revised Draft ROSE

Dear Director Rahaim:

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

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

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

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

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

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

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

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

Sincerely,

Nancy Wuerfel

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

cc: Commissions.Secretary@sfgov.org
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Jonas.lonin@sfgov.org
Kimia.haddadan@sfgov.org
ggppa@earthlink.net

Ruth Gravanis – January 27, 2014

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

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

Preservation of Open space

Comment highlights

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

Department Response

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

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

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

Public-private partnerships and Commercialization of parks

Comment highlights

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

Department Response

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

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

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

Biodiversity & natural areas management

Comment highlights

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

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

Department Response

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

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

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

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

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

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

Park standards

Comment highlights

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

Department Response

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

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

Other Comments

Comment highlights

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

Department Response

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

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

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January 27, 2014

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

Re: Comments on the Draft ROSE

Dear Kimia,

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

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

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

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

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

Objective 4 - Biodiversity, Habitat Value and Ecological Integrity

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

Page 41

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

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

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

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

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

Another term needing definition is ecological restoration.

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

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

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

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

Preserve, Protect and Restore Significant Natural Resource Areas.

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

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

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

Page 42

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

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

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

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

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

Policy 4.3

Water conservation, recycling/reuse, and stormwater mitigation.

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

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

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

Sincerely,

Ruth Gravanis

Sheffield Hale – January 26, 2014

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

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

Biodiversity & natural areas management

Comment highlights

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

Department Response

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

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

Kimia,

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

Thank you for all of your hard work,
Sheffield

--

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

Svetlana Savchuk – January 7, 2014

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

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

Biodiversity & natural areas management

Comment highlights

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

Department Response

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

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

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

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

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

A Flora of San Francisco, 1958 by John Thomas Howell

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

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

Dear Ms. Haddadan,

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

1.

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

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

2.

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

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

NAP/RPD constantly uses:

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

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

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

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

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

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

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

3.

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

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

Tom Radulovich, Livable City – January 27, 2014

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

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

Biodiversity & natural areas management

Comment highlights

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

Department Response

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

POPOS

Comment highlights

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

Department Response

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

Other comments

Comment highlights

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

Department Response

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

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

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

Hi Kimia,

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

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

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

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

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

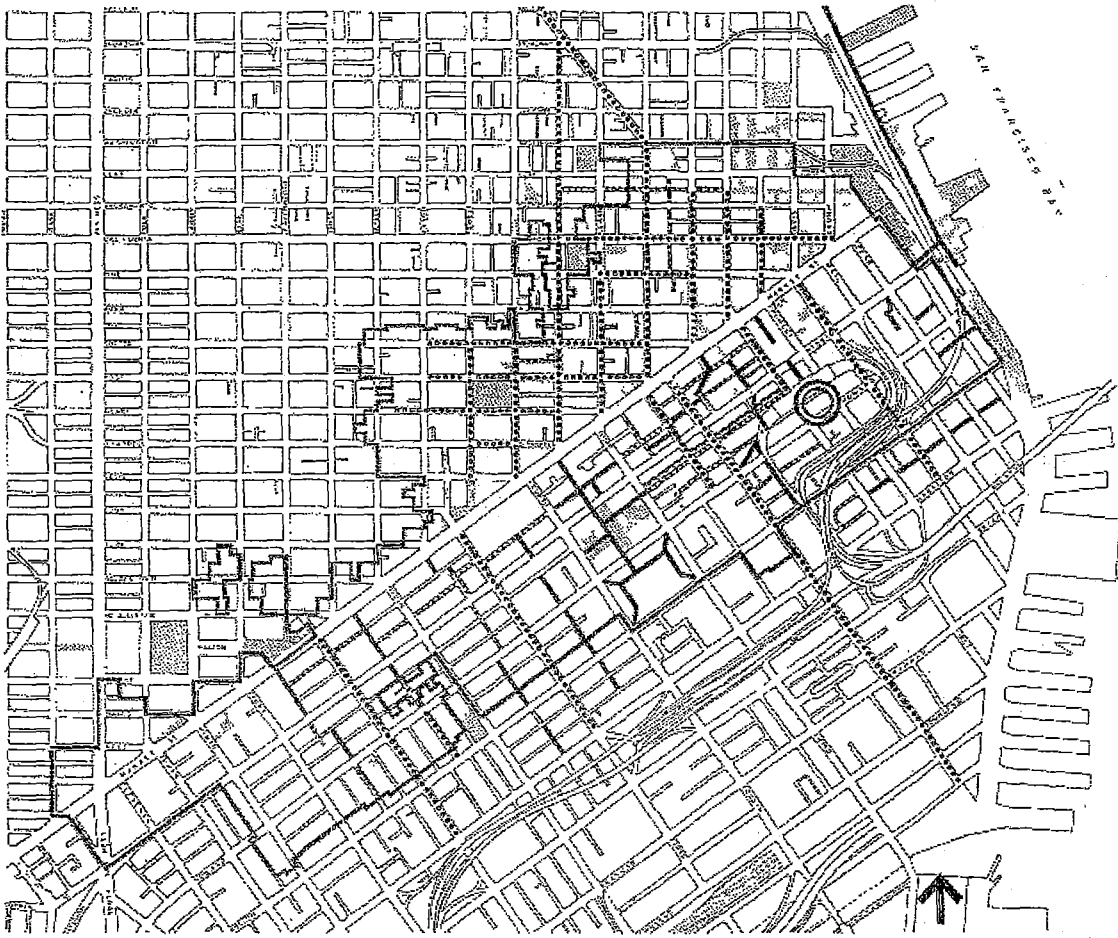
3. Webster Street: the overly-wide blocks of Webster Street between Fulton and Pine, widened to four lanes by the SF redevelopment agency for mysterious reasons, are a great potential open space resource. If the two lanes in each direction were reduced to one skinny lane, Webster Street could become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

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

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

Best,

Tom



0 400FT

PROPOSED PEDESTRIAN NETWORK: DOWNTOWN DISTRICT

Map 7

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

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**SAN FRANCISCO
PLANNING DEPARTMENT**

RECREATION & OPEN SPACE ELEMENT

FINAL DRAFT: MARCH 2014

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

Part 2: Group Comments

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

February 21, 2014

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

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

Recreation & open space acquisition (High Needs Areas)

Comment highlights

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

Department Response

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

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

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

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

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

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

Park funding

Comment highlights

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

Department Response

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

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

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

Other comments

Comment highlights

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

Department Response

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

February 21, 2014

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

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

Dear President Wu and Members of the Planning Commission:

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

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

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

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

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

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

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

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

Sincerely,

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

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

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

cc: Planning Director John Rahaim
Kimia Haddadan
Susan Exline

San Francisco Board of Supervisors
San Francisco Recreation and Park Commission

ROSE Comment Group Combined Comment Packet - February 10, 2014

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

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

Preservation of Open space

Comment highlights

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

Department Response

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

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

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

Recreation

Comment highlights

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

Department Response

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

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

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

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

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

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

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

High Needs Areas

Comment highlights

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

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

Department Response

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

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

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

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

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

Public Private Partnerships and Commercialization of Parks

Comment highlights

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

Department Response

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

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

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

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

Golden Gate Park Master Plan

Comment highlights

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

Department Response

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

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

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

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

Biodiversity and Natural Areas Management

Comment highlights

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

Department Response

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

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

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

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

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

A Flora of San Francisco, 1958 by John Thomas Howell

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

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

Other Comments

Comment highlights

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

Department Response

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

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

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

ROSE WORKING GROUP COMBINED COMMENT PACKET

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

From: ROSE Working Group/Comment Group

Date: February 10, 2013

Subject: Combined Packet of Comments

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

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

Thank you for your consideration.

Sincerely,

The ROSE Working Group

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

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ROSE COMMENT GROUP

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

"High Needs"

Dear Commissioners,

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

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

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

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

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

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

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

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

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

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

Thank you for your attention and consideration,

ROSE Comment Group

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

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

ROSE COMMENT GROUP

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

Biodiversity

Dear Commissioners,

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

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

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

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

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

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

Thank you for your attention and consideration.

The ROSE Comment Group

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

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

ROSE COMMENT GROUP

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

Policy 1.3 - Preserve Existing Open Space

Policy 1.6 - Improvement of Golden Gate Park

Dear Commissioners,

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

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

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

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

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

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

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

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

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

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

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

Thank you for your attention and consideration.

The ROSE Comment Group

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

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

ROSE COMMENT GROUP

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

Recreation

Dear Commissioners,

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

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

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

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

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

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

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

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

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

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

Stronger protection for recreation facilities.

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

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

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

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

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

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

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

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

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

Sincerely,

The ROSE Comment Group

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

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

ROSE COMMENT GROUP

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

Public-Private-Partnerships & Park Improvement Districts

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

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

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

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

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

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

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

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

PID's may have the following negative consequences:

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

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

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

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

Respectfully submitted,

The ROSE Comment Group

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

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

December 15, 2013

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

Dear Director Rahaim,

EXECUTIVE SUMMARY

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

ROSE WORKING GROUP - BACKGROUND

The ROSE Working Group was initiated by the Planning Department at PROSAC in 2011. Two PROSAC volunteers were asked to create a larger Comment Group to review all comments on the 2009 Draft ROSE in order to find consensus on as many points of view as possible. The Rose Working Group was advised that we would help save the Planning Department staff time and money, as the grant money was running out. The Group grew to represent a large collection of San Francisco parks and recreation organizations and coalitions, representing most areas of the City.

The ROSE Working Group met weekly for four months, and on December 12, 2011 presented the Planning Department with a side-by-side document of 90 pages, comparing paragraph by paragraph our proposed consensus changes adjacent to the same paragraphs in the 2009 Draft ROSE. This was done so that the proposed changes would be easily tracked and understandable as to why each revision was proposed.

Following our submission, we had a face-to-face meeting at which Planning Staff said that they would be in touch with us, and that there would be joint meetings with the Recreation and Park Department (RPD) and the Natural Areas Program (NAP).

We did not hear anything from Planning Staff until the stakeholders meeting on Nov. 19, 2013, at which meeting Staff announced, "This is the final draft. We are only looking for typos. We are not looking at policy."

At that meeting, Planning had on display the binder of the public comments they had received on the 2009 Draft ROSE. Our side by side submission was not there. Rather we saw our work product without the side-by-side comparison, a much less useful file.

CURRENT DRAFT -- 2013 ROSE

The current draft has indeed incorporated a number of constructive revisions. It is a much better document than the 2009 Draft. However, the important thrust of the consensus we developed from broad input was not used in some areas. For example the ROSE Working Group proposed the language below for Policy 2.3, that deals with the themes of inequity, high needs, recreation, open space, and proper notification and broad outreach. We believe the import of our submission was missed. Other concerns with the 2013 ROSE, and recommendations for revisions, are detailed below.

POLICY 2.3 Proposed by the ROSE Comment Group, Dec. 12, 2011

Develop new recreational programs and service level goals to ensure programs and facilities meet neighborhood and community-surveyed needs.

The SF RPD shall provide services based on what the various neighborhood residents want. Programming and staffing shall be driven by resident needs, not revenue. . . . The SF RPD shall reach out to community residents, especially in low- and moderate-income neighborhoods, through physical contact, posted notices in high pedestrian traffic locations, and the establishment of electronic communication.

The chief metric by which SF RPD shall judge its service is by the extent the Department meets community needs in all areas of the City, but especially the needs in low- and moderate-income neighborhoods. Further, SF RPD shall ensure free access to community clubhouses for meetings and community gatherings and affordable programming.

To bolster this direction, the City shall direct the Park and Recreation Open Space Advisory Committee (PROSAC) to develop a comprehensive public process for establishing community needs-driven programming and staffing for clubhouses and other recreation facilities.

The following areas in the 2013 ROSE need further work and should be addressed before the 2013 ROSE is presented for approval.

OPEN SPACE AND PARKLAND PROTECTION

Open space and parkland protections need to be expanded in the 2013 ROSE.

As San Francisco becomes more heavily populated, the need for protected open spaces, where people and nature can flourish side by side, will only grow. It is especially important for our children. Nature Deficit Disorder is now prevalent in our society. If children do not get out into nature and learn to explore it on their own, they will grow up without an understanding of the natural world. Teaching young people to appreciate the value of nature is an important role that our parks can and must play.

Some sections of the 2013 ROSE open up our parks to inappropriate development and should be reconsidered. For example, the 2013 ROSE:

Opens up our parklands to building creep: The 1986 ROSE clearly states that new recreation and cultural buildings "should be located outside of existing parks and playgrounds." (ROSE 1986, policy 2.2). The Draft 2013 ROSE offers up potential justifications for building in our parks. (Policy 1.3) For example, one of these is for building "cultural" buildings in our parks. This term is not clearly defined. If buildings are allowed, then rationales can always be found for them, and politicians have difficulty resisting the cause of the moment. Therefore, any group or cause would be able to claim a "cultural" need for a building -- and once one building went up, more would follow. Building creep on public parklands sets the City on a dangerous course. That is why the ROSE should return to the original 1986 ROSE strictures against new buildings in our parks

Policy 1.3's last paragraph allows the use of temporary structures in our parks, exempt from various requirements. Under this policy, any public parkland could be taken over for a long period with the loss of open space. The 2013 ROSE should direct that such proposals be announced, involve public input and decision making, and be approved by the Board of Supervisors following public hearings. Even if those procedures are followed, temporary structures should only be permitted for very short periods of time.

Emphasizes the "city" experience over enjoyment of parkland for its own sake: The frequent use of such words as "activation," and "underutilized," point to an emphasis on our parks becoming another busy, urban experience -- more buildings, more crowds, more planned events, more organized activities, and more commercialization. Many of our parks just need better maintenance. Magnificent places such as Ocean Beach are already heavily used by San Franciscans who go to the beach to enjoy the lack of urban incursions into the shoreline. Ocean Beach becomes "activated" when the sun comes out! (Policy 1.5 and other sections.)

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

consideration (without regard to the testimony from all of the suppliers who make a profit off of our parks), and should be not included in this important policy document.

Ignores the impact of large-scale crowd events that take over parkland for weeks at a

time: The 2013 ROSE views mass crowd events as beneficial from a financial standpoint for McLaren Park (Policy 1.5). However, in the section on Golden Gate Park, (Policy 1.6), the ROSE does not mention the negative impacts of the very large festivals on Golden Gate Park's landscape or the fact that the majority of San Franciscans lose the use of the parkland before, during, and after those events. Impacts to wildlife habitat and the damage to the fragile natural environment should be also given more consideration. The ROSE should recommend finding other, less environmentally vulnerable venues for these massive events.

Gives artwork undue priority for prominent placement in parks: The 2013 ROSE includes the odd concept that artwork is primary to parkland. (Policy 1.7) Artwork reminds us that we are in the midst of a built environment. Artwork can enhance a park, but it should not be the main focus of parkland that is supposed to be naturalistic. Trees and other natural features are nature's ultimate art and should be given priority in our parks. Why is artwork being addressed in the ROSE? The ROSE should be protecting our parks for the enjoyment of our natural surroundings.

Favors certain existing city planning documents over others: Although other planning documents older than the Golden Gate Park Master Plan (Master Plan) are accepted "as is," for some reason, the Master Plan is viewed as needing revisions. (Policy 1.6) However, the 200-page Master Plan is a recent document, finalized in 1998. In addition, it was the result of an extensive 10-year process, with input from many City departments, neighborhood organizations, and individuals. It even has its own Environmental Impact Report. In spite of this extensive vetting of this plan, the 2013 ROSE proposes evaluation of this plan to see which sections are "relevant."

Golden Gate Park was designed and is used by San Franciscans as a respite from urban stress, but the eastern end of the Park is already suffering from intense traffic and institutional creep. Unfortunately, the current Recreation and Park Administration is more focused on revenue generation than on parkland preservation and passive recreation. There is concern by many residents that opening up the Master Plan to major changes would lead to a full-scale dismantling of the Plan and the introduction of more buildings, paving, revenue-generating features, and events in Golden Gate Park. In addition, Section 2 of this ROSE policy proposes paving large areas along the southern edge of Golden Gate Park. This would require re-grading the hilly landscape along the Park's edge and removing many shrubs and trees that currently screen park visitors from the traffic along Lincoln Avenue.

As with most of our parks, the main improvement that Golden Gate Park needs is better maintenance. Piecemeal evaluation of the Master Plan does not do justice to either past planning efforts or to Golden Gate Park itself. The 2013 ROSE should emphasize the need for a better level of maintenance of the Golden Gate Park landscape, protection from high-attendance events, and for preservation of its naturalistic character, as mandated in the Golden Gate Park Master Plan.

"Inequity is not an accident. It is man made and can be eliminated by the actions of human beings. "

Inspiration: Nelson Mandela quote on poverty.

HIGH NEEDS AND SOCIAL INEQUITY

The 2013 ROSE weakens the Park Code definition of "high needs." The 2013 ROSE expands the definition of "high needs" to include future growth and areas with distribution deficiencies. According to the Office of the Budget and Legislative Analyst (Sept. 17, 2013, page. 3), "this allows RPD to give highest priority to properties in areas other than high needs, in contradiction of the priorities specified in the City Park Code." . It opens the door in the ROSE to encourage prioritizing expenditure of tax dollars for open space and parks near the current development of high density market rate residential units. This is an open invitation to de-emphasize affirmative expenditure for such amenities where there is a "conglomeration of high density and high percentages of children, youth, seniors, and households with low incomes," furthering disparity between different neighborhoods, and weakening the fabric of the City.

High Needs Areas: Priority Renovation & Acquisition Areas, (2013 ROSE, Map 06, page 21) is incorrectly labelled: This map mistakenly labels Mission Bay as "high needs", though it is not dense, and it does not have a high percentage of children, youth, seniors or low income households. Mission Bay should not be identified as "high needs". There should be a Map with areas of "Future Growth" that shows future open space, park and recreation deficiencies.

HIGH NEEDS, UNDERSERVED AREAS, SOCIAL INEQUITY AND NEGLECTED AREAS

The 2013 ROSE does not truly prioritize "High Needs" areas for parks, recreation and open space. Despite past public policies for social equity, the politically disenfranchised and lower-income neighborhoods have not kept pace. Like most past expenditures, the Draft ROSE's competing objectives and policies tend to favor new high density development and affluent neighborhoods -- with Area Plans, Park Improvement Plans and public/ private partnerships that are predisposed to higher-income and well-heeled districts. Those with the finances and influence will continue to prosper, leaving behind the Tenderloin, Chinatown, Mission, Excelsior and Bayview with decades of neglected needs for parks, recreation, open space, improvements and maintenance.

The ROSE must make explicit distinctions between the following areas:

5. "High needs" areas that are defined in the Park Code as the "conglomeration of high density, with high percentage of children, youth, seniors and low income households,"

6. under-served and neglected areas that are in need, but are not necessarily dense and only very low income, and
7. those areas of growth which are deficient in open space, recreation and parks. These last areas are the areas of current and recent development which are not low income, not dense with kids, not dense with youth and not dense with seniors. These areas should not be prioritized in the ROSE over long-existing neighborhood needs, or the disparity between various neighborhoods will continue to grow.

The 2013 ROSE should require a strong leveling of the social playing field. More than just acquisition and creation of parks, recreation and open space, the ROSE needs to emphasize equalization of design, maintenance and quality for all neighborhood parks, recreation and open space. To achieve such standards, the ROSE needs to fairly distribute funding and services as a citywide holistic policy. Whether from public, nonprofit or private sources, the whole of funding and services requires equitable distribution based on needs.

THE ROSE & CHILDREN

The 2013 ROSE makes no distinction between children and youth. Map 4C (page 20) shows density of youth, ages 0 – 17. This should be corrected to differentiate the needs of toddlers and young children, preteens and teens. In the 2013 ROSE "children" is left out of the Park Code definition of "high needs." (Page 9.) In addition, references to the needs of "youth ages 0 – 17" should be made consistent with the Department of Children, Youth and Their Families (DCYF) (Policy 2.3, p. 22). There is a world of different needs and interests between a 6 year old and a 16 year old. The ROSE should correct this deficiency.

PUBLIC-PRIVATE PARTNERSHIPS

"The role of a benefactor does not enable one to become a proprietor."

Rev. Harold Snider, the rector of the
Church of St. Francis in North Beach

Public parks are threatened by reliance on public-private partnerships and strong protections are needed to preserve our open space for public use: The general understanding of what the word "public" means in regards to parks and open space came about with the establishment of our National Park System and was reinforced and re-affirmed in the New Deal. The 2013 ROSE urging of the City's dependence upon public-private partnerships as a means of financial support compromises this definition and threatens the independence of our parks and open space.

From "Sustaining Stewardship" in the Introduction to Objective 6, partnerships are emphasized without any clear criteria for who controls the public space, who is responsible to the public, and who is accountable. A private entity's interests may or may not be self-serving, but they are not accountable to the public. Public-private partnerships should not be encouraged simply because they offer local government a means of shifting a public obligation to a private entity. There is nothing in the ROSE's advocacy of public private partnerships that precludes private de facto ownership or control of public lands and facilities.

The 2013 ROSE should insist on maximum protective criteria in public private partnerships to guard the public interest in, investment in, control of and ownership of our public spaces. For example, private entities are not subject to Sunshine regulations and their decision-making process and the outside influences on that process are hidden from the public. The ROSE should provide for full transparency and public vetting of the all internal and external communications as well as all agreements between the City and private partners.

The City should prioritize sufficient public financial resources for our parks and open space.

Since the claim of limited resources is the basis for pursuing public-private partnerships and budgets are factually a set of priorities, the ROSE should encourage the City to prioritize sufficient resources for maintaining and increasing our open space and park and recreation system. Large-scale corporate subsidies of parks and open space are not a desirable alternative to public funding of these public assets because they can come with hidden agendas, lack of transparency, and access or usage restrictions.

Pay to Play? There are many instances in this 2013 ROSE that suggest recreation and open space will go to those who can pay to play. For example, developers are encouraged to provide recreation facilities in private buildings as a way for low-income people to obtain more recreation facilities (Policy 1.11): It is unlikely that affordable access for low-income people would be provided by a profit-oriented developer. As another example of how RPD's revenue-first model further perpetuates inequity and loss of access, RPD often activates public space only to generate funds, as was done with the Peter Pan tent that for six months occupied Sue Bierman Park along the Embarcadero.

Negative consequences of Park Improvement Districts: The ROSE advocates for "*Park Improvement Districts (PIDs)*" (*Objective 6, Policy 6.1*) PIDs have three potential negative consequences and should not be encouraged in the 2013 ROSE:

- 1) PIDs could add to the disparity among quality of open space and parks in neighborhoods. Areas with well established businesses and well-heeled property and homeowners would be able to raise funding resources that would encourage public investment; however, other areas without such resources would languish. This would add to gaps between neighborhoods.
- 2) PIDs could encourage the status quo in City budget priorities.
- 3) PIDs could undermine the city's responsibility to properly maintain all our parks and open space, regardless of the economic status of each area.

For these reasons, PIDs do not belong in the ROSE.

RECREATION

The 2013 ROSE made some progress in including recreation, but there are still some issues that should be addressed.

Recreation has not been an explicit stakeholder in the development of the 2013 ROSE for the past five years:

Recreation was not an explicit directive to the Open Space Task Force in 2007, which drew up a list of the key themes (Planning Department's announcement of Updated Draft, November 2013). In 2009 when the Planning Department held 11 open houses to get input to the ROSE, their questionnaire did not ask specifically for input regarding recreation. And further, when the Planning Commission asked Planning to re-work the 2009 draft, initially there was no stakeholder from recreation on the ROSE Working Group.

There is no specific Related Plans and Agency Program (page 6, Introduction) that advocates for maintaining and increasing recreation. Planning needs to reach out to recreational stakeholders to create a balanced plan.

The ROSE needs to make a clear statement that we need places – facilities and fields -- for active recreation.

The US Department of Health cites the need for moderate to vigorous activity. In balancing all of the pulls on the limited resources that we have, we need to ensure that we retain and expand the recreational facilities that enable us to get active recreation. Unfortunately, we have lost recreational fields and facilities such as swimming pools (Sutro Baths), bowling (We did lose the Japantown Bowl; we almost lost the Presidio Bowl.), tennis courts (Ten years ago there were 156 public courts; now there are 132 courts – not all of which are playable. Courts are under siege at Noe Courts, 1481 Post, Street, 8 Washington site, and others.)

The 2013 ROSE relies on the input of the Department of Children, Youth, and Families (DCYF). (Policy 2.3, page 9.) We recommend that the ROSE clearly state policies and protections for recreation which arise from the advice of DCYF, i.e., distinguish the needs for children from the needs of youth – from playgrounds to playing fields – and provide for active recreation for all children from 0-18 years old.

The ROSE needs to use a clear and consistent definition of recreation. Open space can provide for recreation that is either passive and active. Active recreation – facilities, fields, and programs -- provides active physical activity.

In the 2013 ROSE, there is an inconsistent use of the term recreation. When “recreation” describes both “passive” and “active” uses without differentiating between them, then it muddies the policies. For example, page 29, Policy 2.11 says that each residential building should have open spaces that not only meet a minimum size requirement but should also be usable, quality “recreational” opportunities directly outside residents’ front door. In that same section (page 31), the ROSE says that because open space in the downtown urban core is very limited, it suggests green roofs to meet a number of the City’s open space goals including “recreational enjoyment.” Policy 3.1, page 34, suggests that wide streets provide an opportunity to develop “living streets, especially where dense residential developments are being built. . . the streets should be designed with places for relaxation, recreation and neighborhood gatherings.” Greenery outside your door or on roofs or street medians is not “recreation.” It is “open space.”

The ROSE should have a benchmark for determining how many recreational facilities and fields San Francisco should have, for both its existing population and for its growing population. The ROSE Working Group recommended that Planning use the guidelines from the National Recreation and Parks Association (NARPA) which provides benchmarks for the number of various athletic facilities per resident. Using these NARPA standards, tells us that San Francisco needs more courts, fields, and pools. The ROSE should strongly encourage maintenance, renovation, and acquisition of new recreational facilities to secure what we do have, and to build more in high needs areas.

There needs to be a cohesive, fair, comprehensive, and transparent way to gather information about how to use our precious stock of recreational resources. Two policies in the 2013 ROSE state that recreational needs will be determined by usage. Policy 1.2, page 9 states, “The City should perform user studies and collect usage data to assess which of the existing recreation and open spaces are the most highly used so that those spaces may be targeted for renovation and improvement.” Policy 5.1, page 44, says “Use intercept surveys, which provides observational park usage, facility-based input to provide neighborhood feedback on recreation programming.” However, having no one on unusable fields and courts does not indicate that residents don’t want them. There needs to be stronger outreach, communication, and lead time when planning for a specific place involves a recreational asset.

Maintenance of recreational facilities and fields should be increased; added to that, recreational fields needs a renovation schedule. The ROSE mentioned several ways in which maintenance is monitored and standards set. In reality, recreational facilities and fields are not closely monitored, and there is little mention of renovation in these guidelines.

Because we don’t have enough recreational facilities and fields, then the ROSE should make stronger statements about conserving those that we do have – ensuring not only that they are cleaned but also that there is a program for renovation and acquisition.

The 2013 ROSE states, “RPD now evaluates parks on a quarterly basis and in addition, the City Controller’s Office provides an annual report on the state of the City’s parks . . . to address maintenance needs.” (Policy 1.4, page 11) We looked at the September 2013 report and compared it to a survey of tennis courts conducted by the Tennis Coalition, a part of the SF Parks Alliance. (www.sfparksalliance.org/sftenniscoalition) The City’s scores were mostly above 85%. The Coalition studied found 32 D's and 18 F's because of the unplayable condition of the courts.

Provide strong protection for the current stock of private and non-profit recreation facilities. In Policy 1.11, page 16, the ROSE says that “Some private and non-profit facilities act in a quasi-public manner . . . These types of facilities should be supported when they serve San Francisco residents, and, if removed, the loss of recreational space they provide should be considered.” We are not sure what the word "considered" means. It certainly is not strong enough to prevent the demolition of recreational facilities without replacement, nor does it provide a guide for the City.

Also, this same policy states that “In permitting new development, San Francisco should continue to encourage space for physical activity, including private recreational facilities in building projects to supplement those provided by the City.” The effect could be to make newly built active recreation available exclusively to those who can afford to buy

or rent in new developments..

The ROSE Working Group urges that this policy be added to the 2013 ROSE: "It is essential that the City preserve the public recreation and open space that remains, and that no loss of recreation and open space occurs." Keep this in the 2013 ROSE.

BIODIVERSITY

While more balanced than the 2011 Draft ROSE, the 2013 ROSE offers a view of biodiversity and natural areas in Objective 4 that is still skewed and unbalanced.

Biodiversity should include both native AND non-native plants. The 2013 ROSE says that "Parks and open spaces in San Francisco include both native and non-native species, both of which contribute to local biodiversity." (Policy 4.1, page 42.) Planning staff has stated in conversations that sentence defines "local biodiversity" as including both native and non-native plants. However, we remain concerned that the tone of the rest of Objective 4 (especially the emphasis on "natural areas" in Policy 4.2), skews this definition to include a preference for native versus non-native plants. We need a stronger statement that local biodiversity gives both native and non-native plants near equal weight. Without this clarification, this 2013 ROSE could be used to justify destroying existing non-native habitat for no reason other than that it is non-native, as long as a few non-natives are left alone. That is not a balanced approach.

In addition, a fair Open Space policy would balance the benefits of restoring "native" habitat in any particular park with the negative ecological impacts of destroying the existing non-native habitats on ecosystem services (e.g., carbon sequestration, wind reduction, control of erosion, and storm water reduction), and on the animals, insects, and reptiles currently living there. This balance must be part of the 2013 ROSE -- and, indeed, it is mentioned as desirable at the beginning of Policy 4.1 -- yet the rest of Objective 4 shows little evidence of this balance in wording or in the actions and policies it proposes.

We remain concerned that Policy 4.2 in this 2013 ROSE constitutes a major "land grab" for the Recreation and Park Department's highly controversial Natural Areas Program (NAP). There is no concept of balance between native and non-native in NAP; it is a native-preferred program. This 2013 ROSE defines "natural area" as "remnants of the historical landscape" (Policy 4.2, page 42). It then directs every city agency to look for "natural areas" throughout the City and to develop management plans for any that are found. While NAP is not explicitly stated as the agency that should manage these areas (an improvement from the 2011 Draft ROSE), it is clear that this 2013 ROSE wants NAP management policies to be replicated throughout the City in these areas. NAP management policies include removal of non-native species simply because they are non-native (e.g., cutting down 1,600 eucalyptus trees on Mt. Davidson), heavy use of herbicides, and closure of trails. These NAP management policies are becoming increasingly unpopular as more and more people learn about them. Our concern is that NAP does not just protect remnants of our historical landscape. It takes large areas with thriving non-native habitats and destroys them in order to "restore" them with native plants whether those plants were there historically or not. By equating "natural areas" with "NAP areas," Policy 4.2 seems to be endorsing this unbalanced approach. Again,

this puts the ROSE in the position of saying there will be no real balance between native and non-native, nor between restored native and existing non-native habitats over large areas of City open space that are currently not part of NAP. "Natural" does not necessarily mean "native," yet the 2013 ROSE assumes the two are the same.

People want "natural" areas, meaning areas with plants and trees and no buildings, to be accessible, safe, well-maintained, and green and filled with growing things. People want a variety of plants that look nice, and space that gives them a chance to escape from urban pressures and run, walk, and play with friends, family, and pets. In essence, they want miniature versions of Golden Gate Park in their neighborhood parks. Nowhere in this list does it say "native" only. While some native-only areas are good, people do not want the majority of their open space to be native only. Policy 4.2 seems to imply that any newly defined "natural" area should be native only. That is not balanced.

The definition of "sustainability" given in the ROSE is too restricted. In Policy 4.3, the 2013 ROSE says that park and open space renovations or acquisitions should be done in an environmentally sustainable way, and then lists ways in which that can be done, including planting native and drought-tolerant plants and creating habitat for local and migrating wildlife. However, an environmentally sustainable landscape is one, for example, that is capable of existing with little use of herbicides (and certainly not repeated applications) and little use of irrigation. A sustainable landscape is one that can exist with typical public access and use. A sustainable landscape will not only enhance biodiversity (both native and non-native), but will also provide an attractive, colorful palette throughout the year. These additional definitions and concepts for what constitutes an environmentally sustainable landscape should be included in the ROSE.

The 2013 ROSE also contains no protections for public access to and recreational use of open space in the natural areas, whether a NAP-managed area or other "natural" parkland. Fences have been erected to keep people out and signs installed that say "Off Limits" in NAP-managed areas in city parks. Parkland that is locked away from public use ceases to fulfill the open space requirements and needs of the City's residents. The ROSE should be designed to not only expand the amount of open space in San Francisco but also to protect and expand public access to it as well, not just in how you get to the park, but what you can do in the park once you get there.

Finally, this 2013 ROSE states, "Yet, San Francisco continues to lose species diversity due to isolation and fragmentation of habitats." (Policy 4.1, page 42) We question this statement. Scientific articles have stated that over the past 150 years, San Francisco has lost only 19 of its native species, while 695 native species remain ("Plant traits and extinction in urban areas: a meta-analysis of 11 cities," by Richard Duncan, Steven Clemente, Richard Corlette, et al., *Global Ecology and Biogeography, A Journal of Macroecology*, published online January 17, 2011, Vol. 20, Issue 4). This is hardly the large-scale loss of species implied by this statement in the ROSE. It should be removed.

OTHER OBSERVATIONS

Page numbers correspond to the 2013 ROSE

Page	Title	Comment
p. 9	Objective 1, Policy 1.1	Last paragraph: "traffic medians can be transformed into community gardens," is a hazardous proposal. Planted medians can be a community amenity, but community gardens in medians mix people and traffic. Does the City want the liability for many people of different ages and physical ability gardening in and crossing trafficked streets!
p. 9	Objective 1, Policy 1.2	First paragraph, last lines: left out "children" in defining "high needs" as officially defined in the Park Code.
p. 10	Objective 1, Policy 1.3 (2)	Change last paragraph, first lines: "A loss of open space resulting from approval of the proposed facility shall be offset with simultaneous replacement open space of equal or higher quality." Otherwise, delay means possibly never. The 2013 ROSE should mandate pre-arranged open space swaps.
p. 12	Obj. 1, Policy 1.5	McLaren Park, 2 nd paragraph, "Plant species should be hardy, wind- and fire- resistant..." ? Is this exclusive or inclusive of non-native plants and trees? Add language "including both native and non-native plants."
p. 16	Obj. 1, Policy 1.11	Second paragraph, last line: "if removed, the loss of recreation space they provide should be considered." What does the word "considered" mean in this case? Need more specific guidelines.
P. 16	Objective 2	Paragraph 2, last line: "The future population increase in these areas will exacerbate current open space deficiencies." The ROSE should explicitly state that the current resident populations should be prioritized to receive added open space because it is needed now, and not only in the future when the new higher income folks arrive.
p. 17,	Obj. 2, Policy 2.1	Second paragraph, last line, add " provided acquisition in high needs areas is not dependent upon first securing maintenance funds. "
p. 27	Obj. 2, Policy 2.8	Second & third paragraphs. First sentence of third paragraph: "When surplus land is already zoned for public use, open space should take priority over other public uses, delete "including" and add: other than affordable housing. "
p. 31	Obj. 2 Policy 2.12	Second paragraph, third line from bottom, " provide an in-lieu fee option... " We support strengthening and expanding open space requirements citywide. However, this paragraph mixes up providing for POPOS on-site and allowing a developer to pay a fee so that the developer does not have to provide open space on-site. Open space on-site should be prioritized. The two – POPOS & in lieu fee - should be kept separate
p. 42	Objective 4 Policy 4.1	Second paragraph, last line: add " and non-native species " after "which protects native species _____ and..."
p. 42	Objective 4 Policy 4.1	Last paragraph: Volunteers are not owners; the word "ownership" should be deleted from this sentence.

- p. 43 Obj. 4 Policy 4.2 Paragraph 6 top of page 43 : "However, if such an area ("**natural**" areas) is at risk of loss through development, the site should be examined as a candidate for open space acquisition." Is this intended as a priority use of acquisition funds for natural areas? Unless the threatened space is in a "high needs" areas per Park Code, this should not be a priority.
- p. 46 Obj., 5, Policy 5.4 Second paragraph, top of p. 46. "...City should pursue legislation to address the issue of public liability in situations of joint use or joint development of public properties, so that the liability may be equitably shared by multiple agencies..." **Why** should the SFUSD agree to share liability if RPD arranges for the use of the school property after the school is closed? **Why** should this proposal for legislation be in the ROSE?
- p. 46 Obj. 5 Policy 5.5, last paragraph last line. "The City should also explore ways to share ongoing maintenance of parks and open spaces **with individual stewardship organizations or** through inter-departmental coordination." Is this outsourcing of the maintenance work to cut out experienced workers and skilled people who do our maintenance work , or is this about clearing trails like Sierra Club members do? Language too vague to be a guide.
- p. 46 Objective 6 Policy 6.1 "**General Obligation bonds:**" "RPD has been using general obligation bonds as a long-term capital planning strategy." The Harvey Rose Budget Analyst audit criticized, specifically, that RPD has not been developing long term strategies that are transparent to the public. It seems likely that the 2010 mass layoff of recreation staff and the shift to "revenue first," with the closing of many clubhouses and the privatizing of others, was actually a strategic plan; however, it was not publicly vetted before it was implemented. The 2013 ROSE should direct RPD to share long-term strategies with the public before racing to implement them without a thorough public process.

CONCLUSION

We appreciate once again the opportunity to comment on and further improve the 2013 ROSE. We look forward to working further with the Planning Department and the Commission on this very important document.

ROSE Working Group members,

Denis Mosgofian, PROSAC, District 5,
TakeBackOurParks.org
Kris Schaeffer, Friends of San Francisco
Recreation
Sally Stephens, Ph.D, Golden Gate
Heights, Neighborhood Assoc., SF Dog
Katherine Howard, American Society of
Landscape Architects

Linda D'Avirro, Chair, PROSAC
Judy Berkowitz, President, CSFN
Rose Hilson, Executive Committee,
CSFN
Howard Wong, San Francisco
Tomorrow

cc: Planners Sue Exline, Kimia Haddadan
Jonas P. Ionin, Commission Secretary
Planning Commissioners

Campaign Letter – various dates (28 signatures)

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

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

Preservation of open space

Comment highlights

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

Department Response

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

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

Building new recreational facilities solely through acquisition of additional land is infeasible due to high costs and the scarcity of available land in the City. Therefore, this policy calls for a balanced approach to provide more recreational and cultural facilities through an efficient use of underutilized space within our existing open spaces. This policy provides specific guidelines if new or expanded facilities are proposed and calls for replacement of open space if lost within this process.

Golden Gate Park Master Plan

Comment highlights

- *Proposal to open up the recent 1998 Golden Gate Park Master Plan could lead to undermining the Master Plan.*

Department Response

The Golden Gate Park Master Plan is the result of an extensive city and community collaboration. The result is a very beloved Master Plan for one of the city's most beloved open spaces. The ROSE in no way suggests that any process to review the Golden Gate Park Master Plan should be done unilaterally by the city. However, the

ROSE is a 20 year document and the current Golden Gate Master Plan is now a 16 year old document. Life of policy documents usually span from 20 to 25 years. This ROSE policy calls for improvements to GGP and, per your suggestion, the language has been modified to make it clear that any potential changes to the Master Plan should happen with community collaboration.

To the Land Use Committee of the Board of Supervisors | June 16, 2014

Re: ROSE (Recreational Open Space Element)

To: Supervisors Cohen, Kim and Weiner:

Please do not pass the current draft of the ROSE to the full Board of Supervisors. The draft ROSE contains disconcerting language about the seemingly uncontroversial goal of biodiversity. Everyone agrees that more biodiversity is a good thing. But the ROSE's discussion of biodiversity in San Francisco is extremely misleading, and has potentially troubling implications for our City's urban landscape.

There are only eight native plant species in San Francisco that Rec and Park believes should be monitored because of their rarity. Yet concern for those eight may mean literally the death of thousands of large healthy non-native trees in the name of *biodiversity*, the linchpin for decisions about managing our open spaces, especially in parks.

The ROSE in its current form throws down the gauntlet of biodiversity in how it prioritizes native plants in the name of biodiversity. Despite its somewhat holistic definition that biodiversity encompasses "genetic, species, and habitat diversity," ROSE Policy 4.1 states: "The City should employ appropriate management practices to maintain a healthy and resilient ecosystem which preserves and protects plant and wildlife habitat, especially *rare species which are the primary contributors to local biodiversity*." Historical origin, that is whether a plant is considered "native," is the one factor that the ROSE prioritizes: "Just as the City *restores degraded areas with local native plants for wildlife habitat and biodiversity in natural areas*, habitat and biodiversity should be considered along with traditional landscaping objectives of aesthetics and cultural value throughout our park system and in the streetscape." (Policy 4.3) Its next sentence acknowledges that drought-tolerant non-native plants can contribute to biodiversity, but its emphasis on "rare plants" as increasing biodiversity provides the language needed by native plant enthusiasts to push their agenda.

San Francisco Rec and Park's Natural Areas Program (NAP) relies upon the ROSE's concept of biodiversity as a mandate to plant more native plants at the expense of killing about 3500 healthy non-native trees, eucalyptus, Monterey cypress and Monterey pines, to make more light for native plants.

In fact, there are only 8 native plant species in the entire city that NAP thinks should be monitored because they are at risk.

Of these 8, only 2 are considered *Locally Significant* plants that are listed as "endangered/threatened/rare" by the local Yerba Buena Chapter of the California Native Plant Society (rank 1B, CNPS) AND as *Species of Local Concern* at the

federal level (which is still a lower level in federal classification than endangered/threatened/rare.)

- Three (3) more are considered endangered/threatened/rare ONLY on the CA Native Plant Society's 1B rank.
- Finally, three more species are simply on the CNPS's *Need More Information *or *Watch*rank* (*3 or 4) and not on any federal rank at all. (SNRAMP, Table 7-1)

Of 73 plants ranked as "sensitive" by Rec and Park, only these 8 plants need monitoring and only 2 are determined to be truly at risk by both the Yerba Buena Chapter of CNPS and the federal government! The rest are either no longer known but had been observed in the past, presumed extinct, or classified as *Locally Significant* by the Yerba Buena, CNPS.

This category is, in fact, not a legal statement, but an advisory statement by a Rare Plants committee, headed by the same person who heads (you guessed it) the Biodiversity program of the City's Department of Environment. Additionally, the entire list of extant plants in San Francisco catalogued for CNPS is acknowledged by its author, Michael Wood, as "not a scientific research effort" and coming from "trained and amateur botanists, as well as second-hand reports from motivated citizens without formal botanical training." Do we want Rec and Park to determine the destiny of thousands of trees based upon such shaky sources documenting native plants?

(http://cnpsyerbabuena.org/experience/focus_on_rarities.html)

In fact, prominent Chief Scientist of the Nature Conservancy, Peter Kareiva, claims California has 21% more biodiversity explicitly BECAUSE of our non-native plants. Using the standard reference book, *Jepson Manual: Higher Plants of California*, (University of California Berkeley Press), Kareiva includes native plants and naturalized non-native plants in his count.

Section 4.1 of the ROSE states that "*San Francisco** continues to lose species diversity*," but there is no evidence that this is true. In fact, San Francisco enjoys more biodiversity now than in the past. In San Francisco, native plants are not disappearing. San Francisco retains 97% of its native plants since 1850. Only 19 of 695 species of plants that existed in San Francisco in 1850 are no longer found here. Few natives have been lost, but a lot of naturalized plants have been added since then. Therefore, San Francisco is also more bio diverse now. (Duncan et al, "Plant traits and extinction in urban areas: a meta-analysis of 11 cities," *Global Ecology and Biogeography*, July 2011.) This is also true of birds; the Audubon Society's Christmas counts, which have taken place in San Francisco since 1915, show that there are far more species of birds in the City now than one hundred years ago. There are now dozens more species of warblers, sparrows, raptors, swallows, finches and waterfowl in San Francisco than there were not found in San Francisco one hundred years ago. The fact that many of these birds are not rare does nothing to diminish the significance of their contribution to the City's biodiversity.

Both native and non-native plants are valuable to our urban landscapes. We have only been keeping

records on our plants for a few hundred years, and even then, the records are often spotty. They depend upon observation and documentation, so it's possible that some "lost" plants will be rediscovered. Moreover, the dynamic nature of evolution means some species die, other species move in and adapt to take their place. There are many open places throughout the City where these eight species could be planted, and no trees need be felled to make space. Native plants that already exist could be better protected. But why should San Francisco spend millions of dollars felling healthy trees for the sake of eight native plant species at best, and two species at worst? The ROSE could provide a mandate, if it remains in its current form, which supports native plants as the primary contributor for biodiversity.

At best, the draft ROSE's guiding principle in favor of rare and native species is nothing more than a gardening preference, which should not govern the City's open space management without scientific validation and clear citizen support. At worst, the draft ROSE could be used as a mandate to significantly reduce San Francisco's biodiversity by destroying vital habitat and harming birds.

Please take the time to correct these errors in the draft ROSE.

Thank you.

Regards,

Carolyn Johnston
President, San Francisco Forest Alliance

January 22, 2014

Ms. Kimia Haddadan
Planning Department
1850 Mission Street, 4th floor, SF CA 94103

Re: 2013 Draft ROSE - preservation of open space in our parks

Ms. Haddadan:

San Francisco must budget for more open space and, if a new buildings are needed, the City should allocate funds for both acquisition of the land and the construction of that building. San Franciscans should not have to sacrifice their parks and playgrounds to new buildings. I would like the final 2014 ROSE to reflect that option, as did the 1986 ROSE.

I am concerned that the Draft 2013 ROSE encourages building in our parks. Our parkland is limited and precious. Without a firm "no" to new buildings, we leave our parks open to powerful and well-funded special interest groups. Once one building went up, more would certainly follow. San Francisco as a City will become only more dense. To protect our parks as open space for future generations, the 2013 Draft ROSE should have strong restrictions against new buildings in our parks.

Secondly, the ROSE has incorporated good language on preserving Golden Gate Park's historic value for passive and active recreation within a naturalistic landscape. However, I am concerned that the ROSE's proposal to open up the recent 1998 Golden Gate Park Master Plan to changes could lead to undermining the Master Plan. Please modify that language to stress the importance of evaluating all new proposals for the park within the design intent of the Park and protect the landscape as described in the '1998 Golden Gate Park Master Plan,' Objective II, Policy A: Landscape Preservation and Renewal."

Thank you for your consideration.


Name/ Address/ contact information

John Marc Chardarra
807 Shotwell St #3
SF, CA 94110

cc: Planning Commission
Historic Preservation Commission

jmc@dolorespark.org

January 22, 2014

Ms. Kimia Haddadan
Planning Department
1650 Mission Street, 4th floor, SF CA 94103

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Thank you for your consideration.

Eric Brooks
Campaigns Coordinator
OUR CITY San Francisco

Name/ Address/ contact information

cc: Planning Commission
Historic Preservation Commission

January 22, 2014

→ Ms. Kimia Haddadan
Planning Department
1650 Mission Street, 4th floor, SF CA 94103

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Thank you for your consideration.

*Alan T. Clark, 2000 Montezuma Blvd, SF 94127
415. 566. 4729*

Name/ Address/ contact information

cc: Planning Commission
Historic Preservation Commission

January 22, 2014

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Planning Department
1650 Mission Street, 4th floor, SF CA 94103

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Thank you for your consideration.

DEANNE D'ANNE
351 GUESS ST
SF 94107
Deanne D'Anne

Name/ Address/ contact information

cc: Planning Commission
Historic Preservation Commission

January 22, 2014

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Planning Department
1650 Mission Street, 4th floor, SF CA 94103

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Thank you for your consideration.

Kimia Haddadan SF Green Party County Council / Zeitgeist
Movement

Name/ Address/ contact information

cc: Planning Commission
Historic Preservation Commission

January 22, 2014

Ms. Kimia Haddadan
Planning Department
1650 Mission Street, 4th floor, SF CA 94103

Re: 2013 Draft ROSE - preservation of open space in our parks

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Thank you for your consideration.

Barry Hernandez
2467 28th Ave.
S.F., CA 94116

Name/ Address/ contact information

cc: Planning Commission
Historic Preservation Commission

January 22, 2014

Ms. Kimia Haddadan
Planning Department
1650 Mission Street, 4th floor, SF CA 94103

Re: 2013 Draft ROSE - preservation of open space in our parks

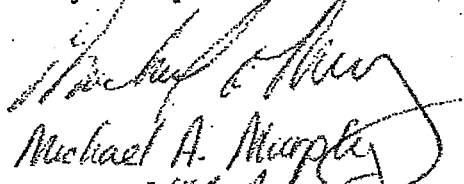
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Thank you for your consideration.


Michael A. Murphy
1571 4th Ave
SF CA 94122

Name/ Address/ contact information

cc: Planning Commission
Historic Preservation Commission

January 22, 2014

Ms. Kirnia Haddadan
Planning Department
1650 Mission Street, 4th floor, SF CA 94103

Re: 2013 Draft ROSE - preservation of open space in our parks

Ms. Haddadan:

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Thank you for your consideration.

SF Green Party

(John Mac Chabon, county council

signing on behalf

cc @ sfgreens.org)

Name/ Address/ contact information

cc: Planning Commission
Historic Preservation Commission

January 21, 2014

Ms. Kimia Haddadan
Planning Department
1650 Mission Street, 4th floor, SF CA 94103

Re: 2013 Draft ROSE - preservation of open space in our parks

Ms. Haddadan:

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Thank you for your consideration.

Claire Spranku
153 Edinburg
San Francisco, Ca 94112

Name/ Address/ contact information

cc: Planning Commission
Historic Preservation Commission

3003

January 21, 2014

Ms. Kimia Haddadan
Planning Department
1650 Mission Street, 4th floor, SF CA 94103

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Thank you for your consideration.



Name/ Address/ contact information

cc: Planning Commission

250 CONNECTICUT ST, SF 94107

C.MILLET@YAHOO.COM

January 21, 2014

Ms. Kimia Haddadan
Planning Department
1650 Mission Street, 4th floor, SF CA 94103

Re: 2013 Draft ROSE - preservation of open space in our parks

Ms. Haddadan:

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Thank you for your consideration.

Nancy Stafford
NANCY STAFFORD
1377 16th AVENUE
S.F. CA 94122 HIS 681-2649

Name/ Address/ contact information

cc: Planning Commission
Historic Preservation Commission

January 21, 2014

Ms. Kimia Haddadan
Planning Department
1650 Mission Street, 4th floor, SF CA 94103

Re: 2013 Draft ROSE - preservation of open space in our parks

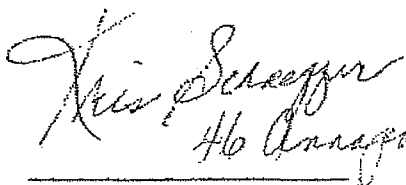
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Thank you for your consideration.


46 Annapolis Terrace, San Francisco CA 94118
415 386 7042

Name/ Address/ contact information

cc: Planning Commission
Historic Preservation Commission

January 21, 2014

Ms. Kimia Haddadan
Planning Department
1650 Mission Street, 4th floor, SF CA 94103

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Thank you for your consideration.

Mai Citra
494 Alabama St
SF CA 94110

Name/ Address/ contact information

cc: Planning Commission
Historic Preservation Commission

January 21, 2014

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Planning Department
1650 Mission Street, 4th floor, SF CA 94103

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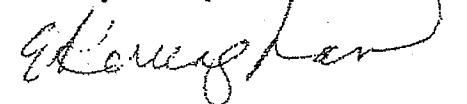
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Thank you for your consideration.


ELLEN KERNAGHAN
718 WISCONSIN ST.
S.F., CA. 94107

Name/ Address/ contact information

cc: Planning Commission
Historic Preservation Commission

January 21, 2014

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Planning Department
1650 Mission Street, 4th floor, SF CA 94103

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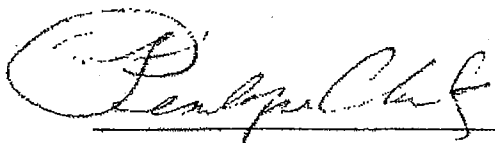
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Thank you for your consideration.

 2544 Leavenworth St. SF 94133
penelope.clark@yahoo.com

Name/ Address/ contact information

cc: Planning Commission

January 21, 2014

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Planning Department
1650 Mission Street, 4th floor, SF CA 94103

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Thank you for your consideration.

Parkmerced Action Coalition
P.O. Box 320162
San Francisco - Ca 94132

Name/ Address/ contact information

cc: Planning Commission

January 21, 2014

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Planning Department
1650 Mission Street, 4th floor, SF CA 94103

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Thank you for your consideration.

*Mr. Terence John Faulkner, J.D.
County Central Committeeman*

Name/ Address/ contact information

cc: Planning Commission

*16 Crespi St.
SF 94132*

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Planning Department
1650 Mission Street, 4th floor, SF CA 94103

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Thank you for your consideration.

Karen Crommie
628 Ashbury St
SF 94117 *kcrommie@aol.com*

Name/ Address/ contact information

cc: Planning Commission
Historic Preservation Commission

February 8, 2014

Ms. Kimia Haddadan
Planning Department
1650 Mission Street, 4th floor
San Francisco, CA 94103

Re: 2013 Draft ROSE - preservation of open space in our parks and protection of Golden Gate Park

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Name/ Address/ contact information

cc: Planning Commission
Historic Preservation Commission

1965 Page SF # 301
SF CA 94117

February 8, 2014

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1650 Mission Street, 4th floor
San Francisco, CA 94103

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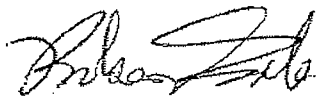
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Robert Earle
536 Clayton St.
San Francisco, CA 94117

Name/ Address/ contact information

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Historic Preservation Commission

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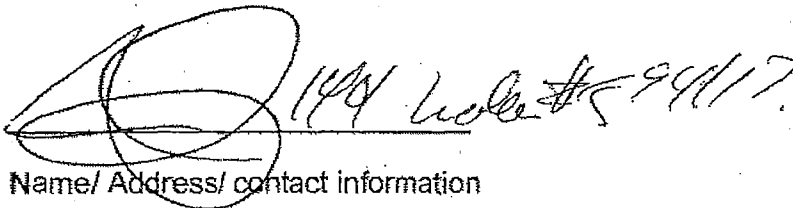
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Handwritten signature of Kimia Haddadan, with the number 144 and the date 2/5/14 written next to it.

Name/ Address/ contact information

cc: Planning Commission
Historic Preservation Commission

February 8, 2014

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Planning Department
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San Francisco, CA 94103

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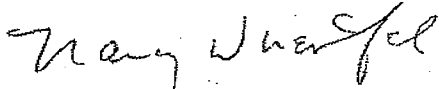
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NANCY WUERFEL
2516 23rd Ave. SF 94116

Name/ Address/ contact information

cc: Planning Commission
Historic Preservation Commission

February 8, 2014

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1650 Mission Street, 4th floor
San Francisco, CA 94103

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Jean Guaidot / 349 Mason Blvd

Name/ Address/ contact information

cc: Planning Commission
Historic Preservation Commission

February 8, 2014

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Planning Department
1650 Mission Street, 4th floor
San Francisco, CA 94103

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Thank you for your consideration.

Juan Barush
711-27-11 Ave
SF 94121

Name/ Address/ contact information

cc: Planning Commission
Historic Preservation Commission

January 22, 2014

Ms. Kimia Haddadan
Planning Department
1650 Mission Street, 4th floor, SF CA 94103

Re: 2013 Draft ROSE - preservation of open space in our parks

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Shawna McJannet
1522-32
S. P. CA 94122

Name/ Address/ contact information

cc: Planning Commission
Historic Preservation Commission

February 8, 2014

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Planning Department
1650 Mission Street, 4th floor
San Francisco, CA 94103

Re: 2013 Draft ROSE - preservation of open space in our parks and protection of Golden Gate Park

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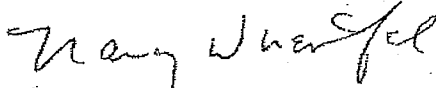
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NANCY WUERFEL
2516 23rd Ave. SF 94116

Name/ Address/ contact information

cc: Planning Commission
Historic Preservation Commission

February 8, 2014

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San Francisco, CA 94103

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Joan Guaidot / 349 Marin Blvd

Name/ Address/ contact information

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Jean Barish
711-27-3rd Ave
SF 94121

Name/ Address/ contact information

cc: Planning Commission
Historic Preservation Commission

Ausberry, Andrea

From: Board of Supervisors (BOS)
Sent: Monday, June 16, 2014 11:30 AM
To: Ausberry, Andrea
Subject: File # 140413 – Open Space Element (ROSE) policy (# 4.2)

From: mari [mailto:mari.eliza@sbcglobal.net]
Sent: Saturday, June 14, 2014 6:08 PM
To: Board of Supervisors (BOS)
Cc: Mar, Eric (BOS); Farrell, Mark (BOS); Chiu, David (BOS); Tang, Katy (BOS); Breed, London (BOS); Kim, Jane (BOS); Norman Yee; Wiener, Scott; Campos, David (BOS); Cohen, Malia (BOS); Avalos, John (BOS)
Subject: re: File # 140413 – Open Space Element (ROSE) policy (# 4.2)

June 14, 2014

Attention Supervisors:

re: File # 140413 – Opposition to the Open Space Element (ROSE) policy (# 4.2)

I join many others who have concerns with the Draft Recreation and Open Space Element (ROSE) that will come before the Board's Land Use Committee on Monday, June 16, and the Board of Supervisors on Tuesday, June 17.

ROSE contains a policy (# 4.2) that directs the City to inventory all open space in the City, including that in private ownership to find which areas could become native plant gardens or "natural areas", and develop management plans for these newly determined areas that mimic the management plans for the Natural Areas Program (NAP).

I am a 30 year resident in San Francisco and I urge you to reject the draft ROSE when it comes before you for a vote, if it contains Policy 4.2 due to the following serious negative consequences:

- 1) It will throttle future community-driven park development — if you want a playground on private land being given to the City, you won't be able to get one if the area has been inventoried as a natural area.
- 2) It will increase conflicts over open space, as NAP's controversial management plans are extended throughout the City, management that costs too much money, cuts down too many trees, uses too many herbicides, and closes too much access.
- 3) It allows non-elected, non-appointed staff from the Dept of the Environment's Biodiversity Program to develop future land use policies for much of the City's open space, with little oversight and transparency.
- 4) It may violate the City's Charter — The Dept of the Environment is prohibited by the City Charter from dealing with land use issues, yet Policy 4.2 will have them do exactly that.
- 5) It is not needed to protect local biodiversity, defined in Policy 4.1 as including both native AND non-native species.
- 6) It is too specific a program to be included in a general policy document like the ROSE.

7) Native-plant-specific biodiversity is a gardening preference, not a science, so why should San Francisco enshrine native biodiversity in the ROSE?

8) It sets up a second biodiversity-oriented approval process for future development in addition to the Planning Commission.

In Summary: Do not allow NAP to turn more areas into native plant gardens, or get involved in controlling how our city's open space can be used in the future.

I insist that Policy 4.2 is removed before you pass on the ROSE.

Thank you for your consideration of my rights as a long-term resident of San Francisco.

Sincerely,

Mari Eliza

Ausberry, Andrea

From: Board of Supervisors (BOS)
Sent: Monday, June 16, 2014 11:37 AM
To: BOS-Supervisors; Ausberry, Andrea
Subject: File 140578: Comment for Jun 16 Land Use Committee - recommend rejection or modification Sec. 4.2 of ROSE
Attachments: Ltr_to_Mayor_Lee_re_Mt_Davidson_1-27-2014-2.pdf, SFBOS Land Use Jun16.docx

From: Kit Kubitz [<mailto:mesondk@yahoo.com>]
Sent: Monday, June 16, 2014 12:30 AM
To: Board of Supervisors (BOS); Wiener, Scott; Kim, Jane (BOS); Cohen, Malia (BOS)
Subject: Comment for Jun 16 Land Use Committee - recommend rejection or modification Sec. 4.2 of ROSE

Clerk, Board of Supervisors
Attn Land Use Committee

Enclosed are two items for inclusion in record and submission to the Supervisors at the Jun 16 Land Use Committee, my letter requesting rejection, delay at this time (until the EIR referred to below is completed) or modification of Section 4.2 proposed as part of the Recreation and Open Space Element of San Francisco's General Plan, and a copy of the Miraloma Park Improvement Club's letter of January 27, 2014 to the Mayor on issues with the Significant Natural Resource Area Management Plan (SNRAMP) Environmental Impact Report (EIR) which is still undergoing review.

Kermit R. Kubitz
415-412-4393
mesondk@yahoo.com

To: San Francisco Board of Supervisors
Land Use Committee

From: Kermit R. Kubitz

Re: Recreation and Open Space Element (ROSE)
Amendment Section 4.2 - Reasons to reject

Dear Sir or Madam

This letter, being submitted to the San Francisco Board of Supervisors (BOS) Land Use Committee via the Clerk of the BOS is to summarize a number of reasons, both as policy and legally, the adoption of the Recreation and Open Space Element (ROSE) of the SF General Plan should not include section 4.2

Section 4.2 appears to direct and allow the City of San Francisco to inventory open space, including private property, for determination and inclusion as areas for native plant gardening or restoration, and to develop management plans for such newly determined areas that correspond to the Natural Areas Program (NAP)

There are three basic reasons why Section 4.2 should not be adopted at this time, but should be either modified or rejected.

First, the scope and limits on the actions intended or authorized by Section 4.2 are not clear, and should be more clearly delineated to exclude areas which members of the public, community groups such as the Miraloma Park Improvement Club, or private property owners may not wish to have included, for a variety of reasons, in any native plant restoration program. More clearly specifying the scope, and appropriate limitations of Section 4.2 would aid public understanding of the intent of the City and protections for its citizens who may or may not wish to participate in such programs.

Second, the adoption of such an element of the San Francisco plan for recreation and open space has already been part of a controversy. Numerous citizens have voiced objections to the Department of Parks and Recreation's Significant Natural Resources Area Management Plan (SNRAMP), and commented on the Environmental Impact Report (EIR) for the SNRAMP. This EIR, which has been repeatedly delayed, found in the last available public draft that a "maintenance alternative" was the environmentally superior option compared to the "maximum restoration alternative" the alternative being pushed by the Department of Parks and Recreation.

The Miraloma Park Improvement Club (MPIC) is on record, in a letter dated January 27, 2014, to Mayor Ed Lee, as opposing the maximum restoration alternative, and has written numerous letters to the General Manager of the Recreation and Parks Department expressing concern about the Natural Areas Program (NAP). Little or no response from the Rec and Parks Department has been received, despite these repeated expressions of community concern. The MPIC's letters have also cited the reports of Professor Joseph McBride, Department of Environmental Science, Policy, and Management, UC Berkeley, who found significant flaws in the forest management plans included in the SNRAMP for Mt. Davidson Park. The fact that these concerns have been raised repeatedly, supported by documentation (a June 29, 2013 letter from Professor McBride to the SF Rec and Park Dept.), and not responded to does not lead to confidence that an ambiguous and unlimited planning element such as Section 4.2 will not be overused or employed as justification for undesired and unknown City actions affecting our and other neighborhoods.

Third, and finally, it is not clear that the proposed Section 4.2 does not constitute an action which either requires an Environmental Impact Report (EIR) or would be considered an action covered by the EIR process for the SNRAMP. As noted above, the EIR has not

been completed for the SNRAMP, the Draft EIR found a maintenance alternative to be the environmentally superior alternative compared to a maximum restoration alternative, and Section 4.2 would appear to shortcut that policy choice before completion of the SNRAMP EIR process. This is neither good policy nor legally permissible, i.e. adoption of a policy related to choices covered under the SNRAMP before completion of the EIR.

For the reasons stated above, I request that adoption of a Recreation and Open Space Element containing the Section 4.2 as presently included either not be adopted at this time, or be significantly modified to reflect community concerns about its scope and meaning. As a general matter, it may be well not to adopt this Section 4.2 at all until the SNRAMP EIR is reissued for public comment and an informed public discussion can be held.

Respectfully submitted, for inclusion in the record of the
SFBOS Land Use Committee June 16, 2014

Kermit R. Kubitz
Resident of San Francisco in Sherwood Forest/Miraloma Park
415-412-4393
mesondk@yahoo.com

2:45 mins.

140413

My name is Denis Mosgofian. I serve as D5 representative on PROSAC and I worked on the ROSE WORKING GROUP evaluating revisions to draft ROSE.

It is most important to get ROSE right.

I have two minutes to persuade the three of you that it is not quite right and should not be moved forward.

First, in Objective 2. Policy 2.1 the meaning of "High Needs" areas has been weakened by the inclusion of criteria that were precisely those criticized in a 2013 audit by Harvey Rose of PROSAC and the Acquisition fund. Nothing has been done to correct the criticism. Instead drafters have incorporated the additional criteria of available maintenance funding and future growth to "high needs". This will marginalize acquisition of open space in true high needs areas.

As if to prove this point, on June 3 at PROSAC Planning & Rec & Park used the very criterion the audit criticized of the availability of maintenance funds to promote the acquisition of the Francisco Reservoir in District 2 for \$9.9 million to the SFPUC not because it is a high needs area, but because the residents pledged \$9 million for it. Two of us voted against it. Pay to play politics with the acquisition fund is being cemented in the ROSE in Obj. 2. This is wrong and must be re-written. Further, Map 07 obscures the highest needs areas by layering future growth and maintenance funds on the conglomeration of high density, high percentages of children, youth, seniors and low income households.

Second, in Objective 6, and elsewhere in ROSE, the drafters urge reliance upon PPP, but have failed to mandate specific criteria to guarantee (1) public control (2) third party accountability to the public, and (3) transparency in the communications & transactions between the City & private entities.

I have given you the Jan. 2014 ROSE WORKING GROUP comments to Planning on these two issues. The ROSE WORKING GROUP was a broad based group of park advocates who were initially organized at the request of Planning at PROSAC to review and find consensus among a myriad of diverse comments on the 2009 draft ROSE.

I urge you to take a hard look at these issues before sending the ROSE to the Board.

Thank you.



Robin Sherrer

Supervisors Malia Cohen, Jane Kim, and Scott Weiner
Land Use Committee
San Francisco Board of Supervisors

Re: ROSE (Recreation Open Space Element)

June 16, 2014

Please do not approve the current draft of the ROSE today. Let it stop here.

This Recreation and Open Space Element is too important, and affects too many people, to be rushed through the approval process, as it has been this spring. Instead, we should spend the time it takes to make sure it is right; more diverse interests and activities should be included in this policy.

Among the major concerns:

In the name of 'biodiversity' (a word that can mean almost anything) this ROSE proposes "replacing" non-native plants. This is the vehicle to cut down tens of thousands of trees since nearly all of San Francisco's mature trees are non-native. It prioritizes rare native plants, even though only a couple of these plants are actually endangered, and most of those Bay Area "natives" do not flourish in San Francisco's cool wet climate. Please visit some of the "native" areas. You will find them either heavily manicured with massive input of volunteer and gardener hours, or you will find that they are scrubby, dry, flammable, and overrun with burrs, thorns and weeds.

The goal of this proposed policy is the transformation of San Francisco's open spaces to mimic the (valued by some) dry scrub of the San Bruno Mountains to the south. Who wants that? Whose vision is this that is being blindly followed?

Worryingly, Policy 4.2 treats all open space in the city - even if privately held - as requiring the same management as the Natural Areas Program. This is a program that plans on cutting down tens of thousands of trees, using pesticides, and restricting access. Imagine Mount Sutro and Mount Davidson without our mature trees - because that is where this is headed.

Trees do so much for this city. They fight global warming by sequestering carbon dioxide, they slow water run-off, fight pollution, absorb sound and air pollution, and provide habitat to hundreds of species of birds and animals.



robinsherrer@gmail.com

The Natural Areas provide for only one kind of recreation - walking along designated trails. They restrict us, our children and pets from going off trails, from picnicking, from playing games, climbing a tree or picking a flower. These are all legitimate recreational uses of the city's open spaces, especially the ones that are left wild. And, considering that **half** of ALL American homes include dogs, the plans for reducing open off-leash spaces for dogs also restricts human outdoor recreation.

These are not the only issues that could seriously impact the quality of the city's open space, both from an environmental view, and for open space hiking and recreation.

Again, this Recreation and Open Space Element is too important, and affects too many people, to be rushed through the approval process, as it has been this spring. Instead, we should spend the time it takes to make sure it is right; more citizen interests and activities should be included in this policy.

Vested interests have shepherded this policy through City Hall; most San Franciscans are shocked at the destruction of their trees and the over-manicuring of their wild open spaces.

Please put a halt to this before it is too late, you may not want your name associated with the results.

Thank you for your attention - and for your best intentions -

Robin Sherrer



ROSE COMMENT GROUP

Re 2013 revised Draft ROSE; Highlight No. 1 January 13, 2014

Dear Commissioners,

Following up on our Dec. 15, 2013 submission and public testimony, we wish to provide further background information and suggested language changes for the area of "HIGH NEEDS" in the Revised Draft 2013 ROSE.

Instead of taking care of the people who reside here already, the 2013 Revised Draft ROSE is prioritizing future demographic needs, which in effect downgrades the needs of residents in current traditionally high needs areas, because, frankly, dense areas may be harder to provide for.

In his September 17, 2013 Audit of PROSAC and the Open Space Acquisition Fund Harvey Rose criticized RPD for expanding the High Needs category "to allow RPD to give highest priority to (acquiring) properties in areas other than high needs, in contradiction of the priorities in the City Park Code." In recent years five properties were acquired by RPD and none were in "High Needs" areas. Last year, a 6th property in Noe Valley was acquired as "high needs" by adding the criterion of "walkability". The only actual acquisition in a "high needs" area was 17th & Folsom purchased with Impact Fees, not Acquisition Funds.

Unfortunately, **in Objective 2, Policy 2.1**, the 2013 Revised Draft ROSE weakens the Park Code definition of "High Needs" by mimicking exactly what Harvey Rose criticized RPD for doing. That is, stretching the boundaries of "high needs" to include "available funding sources that may be leveraged" and areas with distribution deficiencies that are neither dense, low income, nor with a high percentage of children, youth and seniors.

The ROSE must guide future acquisitions by prioritizing the original Park Code definition, and then adding other needs language and corresponding Maps that correspond to "needs" categories 2 & 3 such as we propose below.

The ROSE must make explicit distinctions between the following areas, prioritizing them as follows:

1. "High needs" areas that are defined in the Park Code as the "conglomeration of high density, with high percentage of children, youth, seniors and low income households." These areas are most pressing. These people cannot wait.
2. Under-served and neglected areas that are in need, but are not necessarily dense and only very low income. These areas are next most pressing
3. Areas of growth which are deficient in open space, recreation and parks. These last areas are the areas of current and recent development which are not low income, not dense with kids, not dense with youth and not dense with seniors. These areas should not be prioritized in the ROSE over long-existing neighborhood needs, or the disparity between various neighborhoods will continue to grow. These areas can be provided for over time.
4. **Map 06** labels Mission Bay as high needs, but it is not dense, poor or full of children, youth and seniors and so it must be removed from this map.

The 2013 ROSE should require a strong leveling of the social playing field. More than just acquisition and creation of parks, recreation and open space, the ROSE needs to urge equal quality of design, and maintenance for all neighborhood parks, recreation and open space. To achieve such standards, the ROSE needs to urge fair distributing of funding and services as a citywide policy.

Thank you for your attention and consideration,

ROSE Comment Group

Denis Mosgofian, Kris Schaeffer, Sally Stephens, Katherine Howard,
Howard Wong, Judy Berkowitz, Linda D'Avirro, Rose Hilson

Cc: Sue Exline, Kimia Haddadan, John Raiham, Jonas Ionin
Board of Supervisors

ROSE COMMENT GROUP

Re 2013 revised Draft ROSE; Highlight No. 5 January 24, 2014
Public-Private-Partnerships & Park Improvement Districts

We urge that you reconsider the emphasis planners placed in the 2013 Revised Draft ROSE on Public Private Partnerships (3P), and the advocacy of "Park Improvement Districts".

Public Private Partnerships: The 2013 ROSE should insist on maximum protective criteria in public private partnerships to guard the public interest in, investment in, control of and ownership of our public spaces.

In Objective 6 and throughout the 2013 Revised Draft, the drafters urge reliance on Public-Private Partnerships (PPP), but fail to insist upon specific criteria to (1) guarantee public control over public space, (2) insist upon third party accountability to the public or (3) insist upon transparency in the communications and transactions between the City and private entities. Currently, in such PPP partnerships, for example, the third party is not subject to Sunshine Law requirements but they should be.

Contrary to what the planners have claimed, the 2013 Revised Draft ROSE does not dispel the threat of encouraging privatization. The ROSE must use the current updating as an opportunity to insist upon the above such conditions for PPP relationships to guide their application and ensure the public retains genuine control of parks and open space and can see what is going on.

ROSE should advise that Public-private partnerships should not be encouraged simply because they offer local government a means of shifting a public obligation to a private entity. A private entity's interests may or may not be self-serving, but they are not accountable to the public. Private entities are not subject to revealing their decision-making process and the outside influences on that process. The 2013 ROSE should insist on maximum protective criteria to protect the public interest.

Rather than encouraging public-private partnerships as a response to budget shortfalls, the ROSE should direct the City to prioritize sufficient public resources for maintaining and increasing our open space and the park and recreation system. It should insist on a guarantee of public access, usage, and control.

For these reasons, PPP's should not be encouraged in the ROSE.

We are also concerned about "Park Improvement Districts"(PID) which the planners advocate in the 2013 Draft ROSE (Objective 6, Policy 6.1).

PID's may have the following negative consequences:

- 1) . PID's will add to the disparity between neighborhoods in the quality of open space and parks. Areas with well established businesses and well-heeled property owners would be able to raise funding resources to encourage further public investment in their particular area. However, other areas without such resources would languish further and further behind
- 2) PID's would encourage the status quo in City budget priorities. We would like to see current budget priorities revised, with greater public expenditure for parks, open space and recreation.

3) PID's could undermine the City's responsibility to properly maintain the quality of all our parks and open space, regardless of the economic status of each area. Before PIDs are set up, there must be standards for funding our parks all over San Francisco, with appropriate minimum funding established for equitable operational support and improvements for all neighborhoods. ROSE must provide guidance by insisting on these standards being established before PID's are approved and done in a transparent public process involving all residents.

4) PID's are a form of pay-to-play. Is that really something the ROSE should encourage?

For these reasons, we believe PID's do not belong in the envisioning guide ROSE.

Respectfully submitted,

The ROSE Comment Group

Denis Mosgofian, Kris Schaeffer, Katherine Howard, Sally Stephens, Howard Wong, Judy Berkowitz, Linda D'Avirro, Rose Hilson

Cc: Sue Exline, Kimia Haddadan, John Rahaim, Jonas Ionin, Board of Supervisors



350 O'Shaughnessy Boulevard • San Francisco, California 94127

Telephone: (415) 281-0892

Miraloma Park Improvement Club

January 27, 2014

Mayor Edwin M. Lee
City Hall,
Room 200,
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

Dear Mayor Lee,

The Miraloma Park Improvement Club, incorporated in 1935, has a 2,200 home constituency on the slopes of Mt. Davidson and a membership of approximately 500 residents. We are proud of our long history of close collaborative work with City agencies. We actively advocated for preservation of O'Shaughnessy Hollow as a biologically significant natural area and also for the inclusion of a natural areas plan in the City's Master Plan. In addition, we have supported native plant propagation and conservation on Mt. Davidson and work with the SFPD to ensure that this beautiful park is safe for all to enjoy.

The MPIC has written numerous letters to the General Manager of the Recreation and Parks Department expressing concern about the Natural Areas Program activities currently in process that have not been responded to. MPIC is also opposed to the proposed for expansion in the Significant Natural Resource Areas Management Plan (SNRAMP) for Mt. Davidson Park and as evaluated in the SNRAMP Draft EIR. The Club's DEIR letter stated opposition to the SNRAMP project and maximum restoration alternative. It offered support of the Maintenance or Maximum Restoration Alternatives with certain conditions such as no fencing, herbicide use, or net tree loss.

Since submittal of the Club's DEIR comment letter, Professor Joseph McBride (Department of Environmental Science, Policy, and Management, UC Berkeley) who has completed numerous scientific studies of the San Francisco eucalyptus and Monterey cypress forests for the Presidio and Golden Gate National Recreation Areas, has found significant flaws in the forest management plan included in the Significant Natural Resource Areas Management Plan for Mt. Davidson Park. See the attached June 29, 2013 letter of Professor McBride to the San Francisco Recreation and Park Department wherein he concludes that removal or thinning of trees in Mt. Davidson is not scientifically justified.

Mt. Davidson Park was created in 1929 in response to a three-year community campaign to preserve the historic Sutro Forest and provide a recreational area for the West of Twin Peaks District. We find the current SNRAMP plans to be inconsistent with these goals. We are also concerned about the dissension that the Plan has caused within the community. The SNRAMP EIR process will also not provide a mechanism for elimination of the proposed tree cutting in Mt. Davidson Park. Whereas Professor McBride has concluded that removal or thinning of trees in Mt. Davidson is not scientifically justified. Therefore, to address these concerns, we request that the following Mt. Davidson Park Management Areas identified in the SNRAMP Figure 6.2 (attached) as MA-1c, MA-2c, MA-2e, and MA-3a be removed from the Natural Areas Program designation and returned to regular City park recreational and

maintenance status under the supervision of the Recreation and Park Department Forestry Division as was originally intended in the Park's creation.

Mount Davidson Park is the last significant remnant of the historic Sutro forest on City land. Because the forest has significant historical associations and defines the character of the surrounding neighborhoods, it meets most of the criteria for protection by the City's Landmark Tree Ordinance as an historic cultural resource. The Recreation and Park Department should be directed to fulfill its stewardship responsibility and submit the 30.1 acre forest portion of the park to the Urban Forestry Council for landmark designation.

MPIC supports the non-forested areas of Mt. Davidson Park (Management Areas MA-1a, MA-1b, MA-2a, MA-2b, and MA-2d) remaining as a designated Natural Area and subject to the SNRAMP Maintenance or Maximum Recreation alternatives with conditions.

Thank you for your consideration.

Best regards,

A handwritten signature in black ink, appearing to read 'Robert Gee', with a long horizontal flourish extending to the right.

Robert Gee
President

Attachments

cc:

Supervisor Norman Yee
City Attorney Dennis Herrera
Senator Diane Feinstein
Representative Nancy Pelosi
SF Recreation and Park Department
SF Urban Forestry Council
SF Park, Recreation and Open Space Advisory Committee
West of Twin Peaks Central Council

January 22, 2014

Ms. Kimia Haddadan
Planning Department
1650 Mission Street, 4th floor, SF CA 94103

Re: 2013 Draft ROSE - preservation of open space in our parks

Ms. Haddadan:

San Francisco must budget for more open space and, if a new buildings are needed, the City should allocate funds for both acquisition of the land and the construction of that building. San Franciscans should not have to sacrifice their parks and playgrounds to new buildings. I would like the final 2014 ROSE to reflect that option, as did the 1986 ROSE.

I am concerned that the Draft 2013 ROSE encourages building in our parks. Our parkland is limited and precious. Without a firm "no" to new buildings, we leave our parks open to powerful and well-funded special interest groups. Once one building went up, more would certainly follow. San Francisco as a City will become only more dense. To protect our parks as open space for future generations, the 2013 Draft ROSE should have strong restrictions against new buildings in our parks.

Secondly, the ROSE has incorporated good language on preserving Golden Gate Park's historic value for passive and active recreation within a naturalistic landscape. However, I am concerned that the ROSE's proposal to open up the recent 1998 Golden Gate Park Master Plan to changes could lead to undermining the Master Plan. Please modify that language to stress the importance of evaluating all new proposals for the park within the design intent of the Park and protect the landscape as described in the '1998 Golden Gate Park Master Plan,' Objective II, Policy A: Landscape Preservation and Renewal."

Thank you for your consideration.

Shawna Mathew
1522-32
S. F. CA 94122

Name/ Address/ contact information

cc: Planning Commission
Historic Preservation Commission

