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Building a healthy and sustainable global community for people and the plants and animals that accompany us on Earth

2017 JAN 17 AM 9:36

January 17, 2017

Angela Calvillo
Clerk of the Board
1 Dr. Carlton B. Goodlett Place
City Hall, Room 244
San Francisco, CA 94102-4689

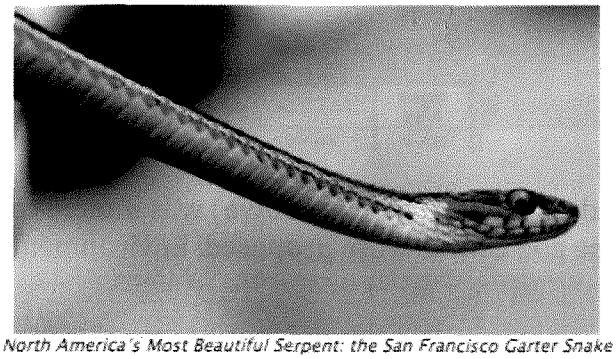
RE: APPEAL OF THE FINAL ENVIRONMENTAL IMPACT REPORT AND PROJECT APPROVAL FOR THE FOR THE SIGNIFICANT NATURAL RESOURCES AREA MANAGEMENT PLAN" (Case No. 2005.0912E)

Dear Ms. Calvillo:

The Wild Equity Institute and the Sierra Club's San Francisco Bay Chapter, the National Parks Conservation Association, Save the Frogs!, Golden Gate Audubon Society, Sequoia Audubon Society, and other interested individuals and organizations submit this appeal of the Final Environmental Impact Report ("FEIR") certified by the Planning Commission and approved by the Recreation and Parks Commission and for the Sharp Park Golf Course redevelopment project in the Significant Natural Resources Area Management Plan ("SNRAMP"), Case No. 2005.0912E.

San Francisco's Significant Natural Resource Areas Program was to be one of the great urban conservation programs in America. But in 2016, San Francisco released a Final Environmental Impact Report ("FEIR") for the Significant Natural Resource Area Management Plan ("SNRAMP") that will, if adopted, turn the program on its head.

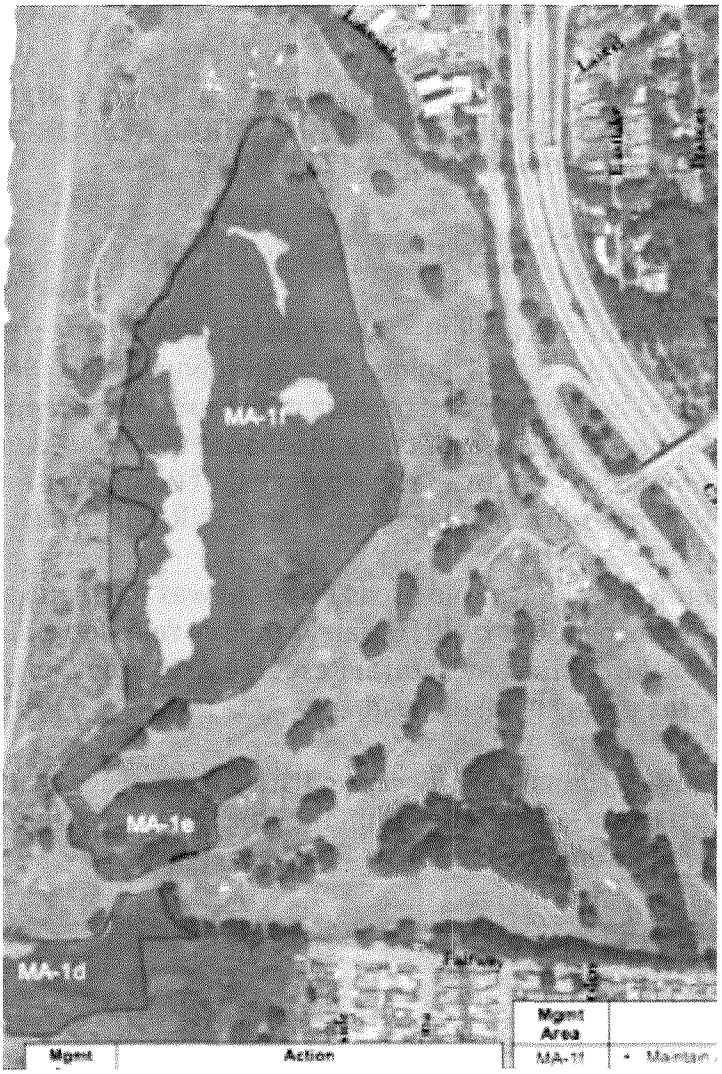
The FEIR removes SNRAMP's original plan for Sharp Park's natural areas and replaces it with a project to redevelop Sharp Park Golf Course within the "recovery" area for two imperiled species, the San Francisco Garter Snake and the California Red-Legged Frog.


North America's Most Beautiful Serpent: the San Francisco Garter Snake


Twain's Frog: the California Red-legged Frog

Sharp Park Golf Course is arguably San Francisco's greatest economic and ecological mistake. It loses hundreds of thousands of dollars every year, taking money away from San Francisco's neighborhood parks and community centers. It kills two endangered species as it operates, and its location along California's coast means that before long it will be flooded by sea level rise: already several links have been washed out to sea.

In February 2006 the Recreation and Parks Department and the Planning Department began a California Environmental Quality Act ("CEQA") process for the Significant Natural Resource Areas Management Plan ("SNRAMP"). The SNRAMP proposed projects in the City's Natural Areas, including Sharp Park's Natural Areas, but did not propose any changes to Sharp Park Golf Course.



The original plan's management boundary (depicted by areas shaded in brown) was limited to the natural lagoon at Sharp Park. No modifications to the golf course were proposed. Environmental groups unanimously supported this plan.

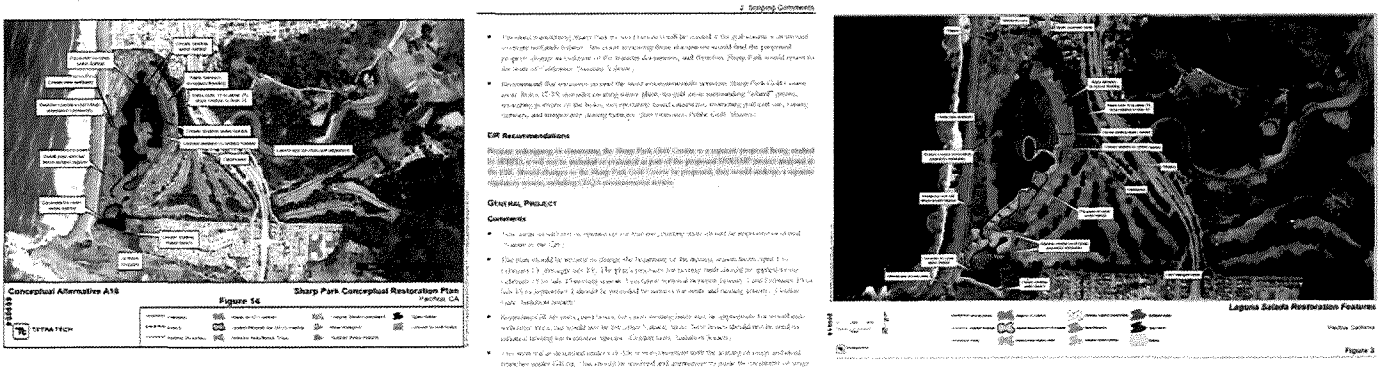
Separately in 2009 the Recreation and Parks Department conceded to the demands of golf purists by releasing a controversial proposal to redevelop Sharp Park Golf Course. Known as "A18," the

proposal was heavily criticized by environmentalists, budget hawks, and Bay Area scientists, who stated:

> *"It is our conclusion that the minimal habitat enhancement proposed by the Park Department in their preferred 18-hole alternative is inadequate to allow the recovery of the San Francisco garter snake and red-legged frog at the site, and is set up to fail with climate change and sea-level rise."*

When this criticism became public A18 appeared dead on arrival at City Hall. Indeed, shortly after A18 was criticized, the Recreation and Parks Department publicly stated:

> *"Because redesigning or eliminating the Sharp Park Golf Course is a separate proposal being studied by SFRPD, it will not be included or evaluated as part of the proposed [Significant Natural Areas Management Plan] project analyzed in the EIR. Should changes to the Sharp Park Golf Course be proposed, they would undergo a separate regulatory review, including CEQA environmental review."*



Despite assurances that A18 (L) would never be inserted into the SNRAMP environmental review, the final EIR plan for Sharp Park (R) is indistinguishable from it.

Yet in November 2016 the Department released a SNRAMP FEIR that removed the original plan for Sharp Park and replaced it with A18, the Golf Course redevelopment project. Moreover, the FEIR declares the Golf Course an Historic Resource that CEQA must protect—even though the original design was washed away by ocean storms decades ago—and therefore refused to consider alternatives that would protect Sharp Park's environment from this controversial project.

Sharp Park, arguably San Francisco's most ecologically and biologically important natural area, would be devastated by implementation of A18, and in the seven years since A18 was first announced, many of the SNRAMP proposals for San Francisco's 31 other natural areas have moved forward or implemented, because they either didn't require environmental review or because they were incorporated into other park projects.

Nonetheless, to ensure that SNRAMP's good proposals for the City's other natural areas wouldn't be affected by the disastrous proposal for Sharp Park, Wild Equity and an array of environmental and community supporters demanded that the Sharp Park Golf Course redevelopment plan be segregated out of SNRAMP and its environmental review process, so the golf course project could stand or more likely, fall on its own merits.

But these reasonable proposals have fallen on deaf ears. The Recreation and Parks Department has informed San Francisco's environmental community that we must sacrifice our most precious biological resource if we desire modest conservation gains in San Francisco's other natural landscapes.

Now Wild Equity, the Sierra Club, Surfrider Foundation, S.F. League of Conservation Voters, National Parks Conservation Association, Sequoia Audubon and others all agree: the environmental benefits proposed by SNRAMP in other areas are far outweighed by the environmental destruction the golf course bailout would cause at Sharp Park.

In 2009, the San Francisco Board of Supervisors unanimously passed an ordinance ordering RPD to study restoration alternatives at Sharp Park. The report RPD ultimately released contained a radical new golf course redevelopment plan for Sharp Park guised as a "recovery" effort for listed species (TetraTech 2009).

After scientists criticized the plan's several significant flaws (Davidson et al. 2011, pp. 1-2), the City convened the fact-finding Sharp Park Working Group (Holland 2011, p. 4-5). When the Working Group released findings that adopted many of (ESA-PWA 2011) recommendations,[1] RPD announced it would abandon a core element of its golf course redevelopment plan—armoring Sharp Park's seawall—but continued to insist that Sharp Park's 18-hole golf course would remain in its historic footprint, even as it acknowledged that sea level rise will erode the seawall and force it inland, squeezing endangered species habitats in a narrow area between the golf areas and the advancing ocean (Holland 2011, pp. 4-5).

Contemporaneously the City was preparing a Draft Environmental Impact Report ("DEIR") for the City's Significant Natural Resource Areas Management Plan ("SNRAMP").

However, when the DEIR was released in 2011 the PWA-based Laguna Salada plan had been replaced with the TetraTech golf course redevelopment plan.[2] This plan is now adopted in the FEIR. Under this plan, 60,000 cubic yards of material would be dredged from the Laguna Salada's wetland complex, creating 12,100,000 gallons of water storage capacity (RPD 2011, p. 99). Four golf links surrounding Laguna Salada would be raised by up to 3.5 feet, creating additional (although unquantified) water storage capacity in the lagoon system (TetraTech 2009, p. 43). Another link would be narrowed, and another removed[3] (RPD 2011, Figure 3). It also calls for

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[1] The penultimate draft of the Sharp Park Working Group's findings did not make any conclusion about Sharp Park Golf Course's integrity or compatibility with the site. However, shortly before its scheduled release, Dave Holland, then director of San Mateo County Parks, leaked a copy of the document to golf advocacy groups (Holland 2011, p. 1-3). These advocates demanded that Mr. Holland "insert something along the following line: 'None of the foregoing is incompatible with preservation of the historic 18 hole golf course that exits on the property.'" *Id.* Mr. Holland agreed to do so, and was able to insert a single line

[2] The plan was attached to the DEIR as Appendix I, and will be referred to throughout this document as (TetraTech 2009) or (RPD 2011) interchangeably.

[3] Although Hole 12 will be removed at Sharp Park, the EIR requires the City to rebuild the link in another location at Sharp Park (RPD 2011, p. 28). The EIR proposes two locations for this link: west of Laguna

filling ½ acre of Sharp Park's wetlands to create an island in Laguna Salada (RPD 2011, p. 99) and landfilling areas where California red-legged frogs breed to "prevent localized ponding" and "to allow more complete drainage to Laguna Salada" (RPD 2011, p. 377).

The FEIR's golf course redevelopment project is interrelated with ongoing wetland drainage at Sharp Park. Both are designed to reduce golf course flooding, and depend upon each other to implement this larger action. The City's larger plan to reduce golf course flooding is composed of (1) ensuring maximum pump rates are reliably achieved, (2) increasing water flow rates towards the pumps, (3) increasing water storage capacity by deepening lagoons and (4) increasing storage capacity by elevating the rim of the lagoon. If any one of these components fails or is not achieved, pumping rates will decrease and golf course areas will flood.

While there is some overlap, this project is primarily designed to accomplish the first and second elements of this plan, *see* (RPD, 2012, p. 6), while the EIR is primarily designed to implement the third and fourth elements of the plan. RPD 2011, p. 99. But the elements are expressly interlinked: the FEIR repeatedly states that the golf course redevelopment project is dependent on efficient pump operations (RPD 2011, pp. 146, 361, 374, 377), and further explains that the golf course redevelopment plan is designed to meet flood control objectives while reducing wear-and-tear on the pumps (TetraTech 2009, p. 43).

The City's statement that the golf course redevelopment plan is wholly separate from pumping operations (Wayne 2011b, p. 2) is belied by its recent permitting strategy discussion with other agencies (Anonymous 2012, p. 1). The agenda from this discussion indicates the pumping and the golf redevelopment project are two temporal phases of a single management strategy. Effects from the later phases are classic indirect effects, because they are caused by the proposed action and are later in time, but still reasonably certain to occur. They also derive, either directly or indirectly from an interrelated element of the City's larger flood management strategy. In either case, by law the City must review these effects during this CEQA process, regardless of the City's colloquial assertion that the projects are separate.

The City's proposal has already been approved by several oversight bodies, and in each case the City made clear that it would not review or consider restoration alternatives at Sharp Park. The City's single-minded approach to Sharp Park and its completion of many steps in its approval process show that the golf course redevelopment project is reasonably certain to occur.

The City's proposal to rebuild Sharp Park Golf Course's original layout was endorsed by San Francisco's Recreation and Parks Commission in December of 2009, to the exclusion of all other options for Sharp Park's future (RPD 2011, p. 2). In the SNRAMP EIR, the City concluded that only an 18-hole Golf Course at Sharp Park was a feasible alternative for the property, and refused to consider other restoration options that would provide additional benefits to listed species (RPD 2011, p. 3). Moreover, the EIR contains a mitigation requirement that will force the City to rebuild

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Salada, between the seawall and frog breeding areas, or east of Highway 1. The EIR suggests that surrounding Laguna Salada with golf links would have fewer significant impacts because it would retain historic integrity of the golf course, even thought it would negatively affect wildlife and intrude on protected natural areas. However, the EIR defers the ultimate decision to subsequent environmental review.

a golf link in one of two places in subsequent environmental review (RPD 2011, p. 28). Thus, the City's existing approvals and contemporaneous permitting procedures create a binding requirement to implement the golf course redevelopment plan.

Furthermore, when the San Francisco Board of Supervisors passed an ordinance requiring the City to negotiate with the National Park Service to implement a restoration plan for the property, the Mayor vetoed the ordinance, (Lee 2011, p. 1), again indicating the City's intent to ensure the golf course redevelopment project occurs. And with the City's encouragement, San Mateo County passed a resolution calling for San Francisco to "maximize recreation opportunities" at Sharp Park by implementing the golf course redevelopment plan (San Mateo Co. 2011, p. 2).

These actions by the City are all that is necessary to show that the golf course redevelopment plan is reasonably certain to occur. While there may be some ambiguity about how the ultimate Golf Course design will turn out, the City's CEQA documents must give consideration of the effects of interrelated and interdependent activities whether or not all of the activities' impact is known.

Now the plan has added mitigation measures dealing with acidic soils that were not present in the 2011 DEIR released for public review. For example, M-BI-6a has been modified extensively to add several pages of mitigation related to acid sulfate and anoxic conditions during dredging. None of this has been available for public review during the public comment process for this CEQA process. When such large changes are made, recirculation is required. *See Friends of the College of San Mateo Gardens v. San Mateo County Community College District,* (2016) 1 Cal. 5th 937.

In addition, the FEIR fails to adequately analyze how mitigation measures at Sharp Park will impact the San Francisco garter snake as a fully protected species pursuant to Fish & G. Code § 5050, subd. (b)(1) in light of the holding in *Center for Biological Diversity v. California Department of Fish and Wildlife* (2015) 62 Cal.4th 204. Here, the Court recognized that fully protected species are subject to stricter prohibitions than provided under the Endangered Species Act, including an express prohibition on taking or possessing a fully protected species as mitigation for a project under CEQA. The FEIR is in violation of this holding, because it's proposal to redevelop Sharp Park Golf Course is mitigated with several provisions that expressly demonstrate "take" of the San Francisco garter snake. For example, the project explains that "Impacts to San Francisco garter snakes could occur from construction activities involving vehicle traffic and the use of heavy equipment which could result in direct mortality of individuals," DEIR p. 322, and then explains that mitigation measure M-BI-6a specifically requires "an on-call specialty environmental monitor with a valid 10(a)(1)(A) permit to handle San Francisco garter snakes and relocate them." DEIR p. 323. This is simply not permissible under CEQA after *Center for Biological Diversity v. California Department of Fish and Wildlife.*

The FEIR does not comply with San Francisco's Sea Level Rise Action Plan, released in March of 2016. The Action Plan requires San Francisco to consider adaptation and retreat alternatives where lands are at risk from expected sea level rise impacts. While the FEIR recognizes that Sharp Park is one of two natural areas at risk from expected sea level rise impacts, it fails to consider any alternative that would protect Sharp Park's natural ecology from salinity intrusion or other impacts from sea level rise. This violates CEQA and San Francisco's own plans for sea level rise adaptation.

The FEIR selectively excludes alternatives without substantial evidence or sound logic. In a case like this where public concern and controversy is high, evidence of alternatives is widespread, and when massive take has occurred under existing protocols, the City cannot ensure that there will be no significant adverse environmental impacts without at least considering alternatives to the golf course redevelopment project.

In particular, (ESA-PWA 2011) contributed a restoration model for Sharp Park that is based on the best scientific data available at Sharp Park and addresses all of the above deficiencies in the project. For example, where the project suggests that both species are "conservation reliant" due to their isolation, the ESA-PWA proposal emphasizes connective habitat corridors across Sharp Park.

Where the project suggests it will continue to drain and fertilize Sharp Park's wetlands on the one hand, and then dredge excessive tule and cattail growth on the other, PWA-ESA's mitigation model constrains pumping so that water levels will rise high enough to drown excessive vegetation growth, and ensures that water levels rise and fall slowly so that Sharp Park's entire wetland feature remains hydrologically connected and contains sufficient water for egg masses to develop into adult frogs.

Where the project ignores the fundamental changes climate change will bring to this landscape, ESA-PWA's plan provides mitigation and recovery areas upland and inland from areas that will be immediately impacted by catastrophic flooding events, and then creates natural defenses around these areas by restoring wetlands and vegetative features between the rising sea and the restored habitats. These features will absorb and slow the rate of water if intrusion ever does occur.

Where the project blames the frog for an apparently indiscriminant breeding behavior and for laying eggs in 'unsustainable' habitats, ESA-PWA's mitigation and restoration plan recognizes that the California red-legged frog can successfully breed under natural conditions at Sharp Park, so long as the velocity, rapidity, and scope of the wetland draining project implemented by San Francisco is curtailed.

All of these outcomes would provide greater conservation and public benefits than the project disclosed in the notification, yet the City does not seem prepared to consider alternatives to the project proposal. Such reluctance is inconsistent with sound environmental review and the strictures of CEQA.

The City's rationale for rejecting the full restoration alternative based on possible impacts to historic resources associated with the golf course is not supported by substantial evidence or law. This is particularly true because RPD's internal communications demonstrate that under its golf course redevelopment project:

- "Sea level rise will reduce the capacity of sharp park to function as a freshwater wetland that will support frogs and snakes"
- "Based on most conservative predictions of sea level rise, the majority of sharp park west of highway 1 will not support freshwater wetlands in the long term"
- "The wetland complex at sharp park is not expected to provide habitat in perpetuity."

(Wayne, 2009). Yet the impacts caused by the redevelopment project are deemed of less import in the FEIR compared to maintaining a golf course on the property.

This conclusion is internally inconsistent with the FEIR. The FEIR makes clear that the only mitigation measure necessary for changes to the golf course are to document the golf course's landscape before changes—including the elimination of holes or links—are made. M-CP-7. Thus there is no limitation within the FEIR's own logic to exclude these other alternatives, and they must be considered by the City.

This letter and its references, along with all other documents submitted into the record for this project or related Sharp Park projects are incorporated herein by reference.

Sincerely,

Brent Plater

WILD Equity
INSTITUTE
Building a healthy and sustainable global community for people and the plants and animals that accompany us on Earth

Dear San Francisco Board of Supervisors,

Wild Equity is now, and has always been, a strong supporter of the City's Natural Areas and its Natural Areas Program. We believe that the preservation of San Francisco's Natural Areas is among the most pressing conservation issues of our time.

However, we have grave concerns about the California Environmental Quality Act ("CEQA") review process for the Significant Natural Resource Areas Management Plan ("SNRAMP"). Indeed, we have consistently and repeatedly objected to the City's decision to insert a project known as "A18," the Sharp Park Golf Course redevelopment project, into the SNRAMP EIR process.

To date you have not taken any action to address this concern. This is perplexing, as our request is entirely consistent with the City's November 2009 Scoping Report for the SNRAMP CEQA process, which stated:

> [b]ecause redesigning or eliminating the Sharp Park Golf Course is a separate proposal being studied by SFRPD, it will not be included or evaluated as part of the proposed SNRAMP project analyzed in the EIR. Should changes to the Sharp Park Golf Course be proposed, they would undergo a separate regulatory review, including CEQA environmental review.

We write today to reiterate that unless all Sharp Park Golf Course redevelopment projects and management proposals derived from A18 are removed from the SNRAMP CEQA process, Wild Equity will oppose SNRAMP's approval. In contrast, if the City were to revert to the original SNRAMP project for Sharp Park—i.e., the project proposed in the 2006 Final Draft SNRAMP—Wild Equity will strongly support SNRAMP's adoption.

We have reached this conclusion after carefully weighing the SNRAMP's conservation benefits against the environmental harm that will be wrought by A18. It is clear that the proposed conservation benefits SRNAMP may bring to the City's other natural areas are greatly outweighed by the concrete harms that A18 will impose on Sharp Park.

A18 has been heavily criticized by scientists, conservation groups, and community park advocates in both 2009 and 2011 because of its harmful impacts on imperiled wildlife and the economic sustainability of the Recreation and Park Department. Wild Equity is not willing to sacrifice Sharp Park, unquestionably the Recreation and Park Department's most ecologically and biologically important natural area, to this ill-conceived project for a vague promise of conservation benefits in other areas. Yet this is what SNRAMP DEIR's preferred alternative

Brent Plater, Executive Director ❧ 474 Valencia St., Suite 295 ❧ San Francisco, CA ❧ 94103
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currently offers.

We therefore reiterate that we will oppose adoption of the SNRAMP DEIR unless all Sharp Park Golf Course redevelopment projects and management proposals derived from A18 are removed from the SNRAMP CEQA process.

Sincerely,

Brent Plater

Brent Plater

Surfrider Foundation, San Francisco Chapter
3830 Noriega St. San Francisco, Ca 94122

11/20/14

Dear San Francisco Board of Supervisors,

The mission of the San Francisco Chapter of Surfrider Foundation includes the preservation and enhancement of San Francisco's natural coastline.

We are writing to the Board to relay our grave concerns about the California Environmental Quality Act ("CEQA") review process for the City's Significant Natural Resource Areas Management Plan ("SNRMAMP"). Specifically, we take issue with project known as "A18," the Sharp Park Golf Course redevelopment project, which is presently included into the SNRAMP EIR process.

Sharp Park golf course, while being an affordable recreational amenity to the public, also happens to be located on a coastal wetland. The preservation of the course layout relies upon the maintenance of a sea wall on the beach. The seawall prevents waves from filling the lagoon and thereby flooding the links. The problem is Pacifica has already lost most of its beach area to seawalls and rock revetments. In our view, to promote further beach loss in Pacifica (by continuing to invest in the operation of the golf course) is bad environmental policy. Coastal wetlands and lagoons such as the one at Sharp Park help purify water, and bring sand to our eroding beaches. Furthermore, our allies in the environmental community are correct in claiming that the golf course negatively impacts endangered species (San Francisco Gartner snake and Ca red legged-frogs).

We write today to ask for the removal of the Sharp Park Golf Course redevelopment projects and management proposals (derived from A18) from the SNRAMP CEQA process. Coastal wetlands and beaches are significant natural areas. Wherever we have a chance to restore or protect them, we should embrace the opportunity. Thank you.

Sincerely,

Bill McLaughlin

Surfrider Foundation, San Francisco Chapter

Restore Sharp Park Campaign Lead

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San Francisco Bay Chapter
Serving Alameda, Contra Costa, Marin and San Francisco Counties

July 22, 2014

John Rahaim, Director and Planning Commissioners
San Francisco Planning Department
1650 Mission St #400
San Francisco, CA 94103

Re: Sharp Park and the Significant Natural Resource Areas Management Plan (SNRAMP) EIR

Dear Director Rahaim and Planning Commissioners:

The Sierra Club again urges you to remove from the SNRAMP CEQA process all Sharp Park Golf Course redevelopment projects and management proposals that are a part of project A18, the Sharp Park Golf Course redevelopment project. If the SNRAMP EIR is adopted with these elements the Sierra Club will have no choice but to oppose this EIR since it will violate CEQA and put endangered species (the San Francisco garter snake and the California red-legged frog) at risk.

We would do this with great reluctance since we are strong supporters of the San Francisco Natural Areas Program and wish to see it implemented as fully as possible. Unfortunately, project A18 would undermine the goals of the Natural Areas Program at Sharp Park since, as said above, it would impact endangered species and addresses a golf redevelopment project, not a natural areas project.

It is obvious to us that project A18 requires a distinct and separate CEQA process, not as a part of the SNRAMP EIR. We have made our concerns well known to you, as we have previously objected to inserting A18, into the California Environmental Quality Act ("CEQA") review process for the Significant Natural Resource Areas Management Plan ("SNRMAMP").

Your own analysis supports our position. The City's November 2009 Scoping Report for the SNRAMP CEQA process stated:

> [b]ecause redesigning or eliminating the Sharp Park Golf Course is a separate proposal being studied by SFRPD, it will not be included or evaluated as part of the proposed SNRAMP project analyzed in the EIR. Should changes to the Sharp Park Golf Course be proposed, they would undergo a separate regulatory review, including CEQA environmental review.

Furthermore, the Sharp Park Golf Course redevelopment project, in contrast to the "program" level analysis of SNRAMP part of the DEIR, is analyzed at the "project" level and would therefore not require additional CEQA review before it is implemented even though it was not subject to all of CEQA's required review procedures and not a single alternative to A18 was considered in the DEIR.

A18 has been heavily criticized by scientists, conservation groups, and community park advocates in both 2009 and 2011 because of its harmful impacts on imperiled wildlife and the economic sustainability of the Recreation and Park Department.

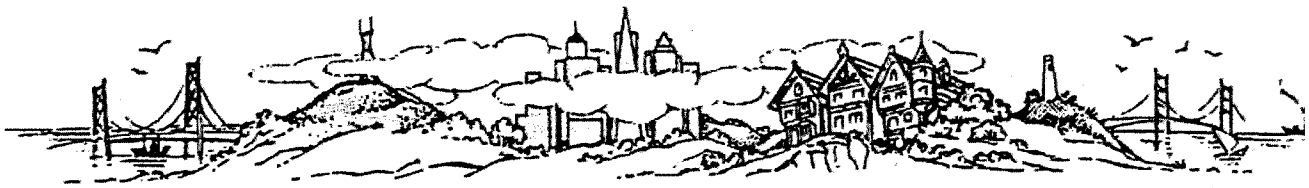
While we strongly believe that the Natural Areas Program is critical to the future of San Francisco and its natural ecology, we do not believe it is appropriate or ethical for the City to attempt to seek acceptance of an environmentally disastrous project by inappropriately injecting it into the CEQA process of an otherwise strongly supported program.

We therefore reiterate that we will oppose adoption of the SNRAMP DEIR unless all Sharp Park Golf Course redevelopment projects and management proposals derived from A18 are removed from the SNRAMP CEQA process.

Sincerely,

Arthur Feinstein
Conservation Chair

Cc: San Francisco Board of Supervisors



San Francisco Tomorrow

Since 1970, Working to Protect the Urban Environment

September 17, 2014

John Rahaim, Director and Planning Commissioners
San Francisco Planning Department
1650 Mission St #400
San Francisco, CA 94103

Re: Sharp Park and the Significant Natural Resource Areas Management Plan (SNRAMP) EIR

Dear Director Rahaim and Planning Commissioners:

San Francisco Tomorrow's goal of having a livable, sustainable and environmentally healthy city depends in great part upon the City employing a transparent and lawful planning process. Sadly, the present SNRAMP DEIR fails both tests.

The unjustified inclusion of project A18, the Sharp Park Golf Course redevelopment project, in the SNRAMP EIR clearly violates CEQA. We believe it obvious that project A18 requires a distinct and separate CEQA process since project A18 does not address a Natural Area project and, in fact, addresses a golf course project.

Your own analysis supports our position. The City's November 2009 Scoping Report for the SNRAMP CEQA process stated:

> [b]ecause redesigning or eliminating the Sharp Park Golf Course is a separate proposal being studied by SFRPD, it will not be included or evaluated as part of the proposed SNRAMP project analyzed in the EIR. Should changes to the Sharp Park Golf Course be proposed, they would undergo a separate regulatory review, including CEQA environmental review.

SFT urges you to comply with the law and your department's own position and remove from the SNRAMP EIR process all Sharp Park Golf Course redevelopment projects and management proposals. Otherwise, SFT will have no choice but to oppose this EIR since it will violate CEQA and put endangered species (the San Francisco garter snake and the California red-legged frog) at risk.

We want to emphasize that SFT strongly supports the City's Natural Areas Program and considers it a landmark and essential component of the City's General Plan. All the more reason to not jeopardize the integrity of the Natural Areas Program, and the City's planning process itself, which would be the

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(415) 585-9489

result of the City's attempt to attach an inappropriate project into an otherwise strongly supported program seemingly to make it easier for that controversial project to get adopted. Please remove Project A18 from the SNRAMP EIR.

Sincerely,

Jennifer Clary
President

cc: San Francisco Board of Supervisors

San Francisco League of Conservation Voters

Clerk, San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place
City Hall, Room 244
San Francisco, CA 94102-4689

July 15, 2014

RE: TENTATIVE OPPOSITION TO THE SIGNIFICANT NATURAL RESOURCE AREAS MANAGEMENT PLAN

Dear Clerk of the Board:

The San Francisco League of Conservation Voters (SFLCV) is now, and has always been, a strong supporter of the City's Natural Areas and its Natural Areas Program. We believe that the preservation of San Francisco's Natural Areas is among the most pressing conservation issues of our time.

However, we have grave concerns about the California Environmental Quality Act (CEQA) review process for the Significant Natural Resource Areas Management Plan (SNRMAMP). Indeed, we have consistently and repeatedly objected to the City's decision to insert a project known as "A18," the Sharp Park Golf Course redevelopment project, into the SNRAMP EIR process.

To date you have not taken any action to address this concern. This is perplexing, as our request is entirely consistent with the City's November 2009 Scoping Report for the SNRAMP CEQA process, which stated:

> *[b]ecause redesigning or eliminating the Sharp Park Golf Course is a separate proposal being studied by SFRPD, it will not be included or evaluated as part of the proposed SNRAMP project analyzed in the EIR. Should changes to the Sharp Park Golf Course be proposed, they would undergo a separate regulatory review, including CEQA environmental review.*

We write today to reiterate that unless all Sharp Park Golf Course redevelopment projects and management proposals derived from A18 are removed from the SNRAMP CEQA process, SFLCV will oppose SNRAMP's approval. In contrast, if the City were to revert to the original SNRAMP project for Sharp Park—i.e., the project proposed in the 2006 Final Draft SNRAMP—the SFLCV will strongly support SNRAMP's adoption.

We have reached this conclusion after carefully weighing the SNRAMP's conservation benefits against the environmental harm that will be wrought by A18. It is clear that the

proposed conservation benefits SRNAMP may bring to the City's other natural areas are greatly outweighed by the concrete harms that A18 will impose on Sharp Park.

A18 has been heavily criticized by scientists, conservation groups, and community park advocates in both 2009 and 2011 because of its harmful impacts on imperiled wildlife and the economic sustainability of the Recreation and Park Department. The SFLCV is not willing to sacrifice Sharp Park, unquestionably the Recreation and Park Department's most ecologically and biologically important natural area, to this ill-conceived project for a vague promise of conservation benefits in other areas. Yet this is what SNRAMP DEIR's preferred alternative currently offers.

We therefore reiterate that we will oppose adoption of the SNRAMP DEIR unless all Sharp Park Golf Course redevelopment projects and management proposals derived from A18 are removed from the SNRAMP CEQA process.

Sincerely yours,

Amandeep Jawa, President
San Francisco League of Conservation Voters

SEQUOIA
AUDUBON SOCIETY
P.O. Box 620292
Woodside, CA 94062

July 29, 2014

To Whom It May Concern:

Resolution to remove the Sharp Park Golf Course Design Project (Alternative A18) from the Environmental Impact Report for the San Francisco Recreation and Park Department's Significant Natural Resource Areas Management Plan, and to oppose any final SNRAMP EIR that contains such proposals.

WHEREAS, the two-fold mission of the Recreation and Park Department's Natural Areas Program (NAP) is to "preserve, restore, and enhance remnant Natural Areas, and to develop and support community-based site stewardship of these areas"; and
WHEREAS, the Significant Natural Resource Areas Management Plan (SNRAMP) is intended to guide management activities and site improvements in Natural Areas by the Recreation and Park Department for the next 20 years; and
WHEREAS, one of these natural areas, Sharp Park, has significantly different ecological and administrative issues because it is the only Natural Area that contains the endangered San Francisco garter snake and the threatened California red-legged frog, and is the only Natural Area located outside of San Francisco county; and

WHEREAS, the planning process for the SNRAMP began in 1995 and has included the input of multiple stakeholders including a Citizen Task Force and Green Ribbon Panel in 2002, a Citizens Advisory Committee in 2003, an ad hoc working group in 2004, and three independent scientific peer reviews and a public comment period on the 2005 public draft; and

WHEREAS, the SNRAMP Final Draft Plan was approved for environmental review in 2006 and has completed several steps in the California Environmental Quality Act (CEQA) review process, including the publication of a Notice of Preparation, distribution of an Initial Study, the conclusion of public scoping and comment periods, and the publication of a final Scoping Report by November of 2009; and
WHEREAS, Alternative A18, a conceptual alternative to redesign Sharp Park Golf Course, was separately proposed by the Recreation and Park Department in November 2009; and

WHEREAS, Alternative A18 did not complete several CEQA procedural requirements, including a discussion of Alternative A18 in a Notice of Preparation and Initial Study; review by or consultation with Responsible Agencies; or formal public comment and review of draft golf course designs; and

WHEREAS, Alternative A18 was heavily criticized by scientists, conservation groups, and community park advocates because of its harmful impacts on imperiled wildlife and the economic sustainability of the Recreation and Park Department;

WHEREAS, in the November 2009 Scoping Report for the SNRAMP CEQA process, the Recreation and Park Department and the Planning Department jointly stated that "because redesigning or eliminating the Sharp Park Golf Course is a separate proposal being studied by SFRPD, it will not be included or evaluated as part of the proposed SNRAMP project analyzed in the EIR. Should changes to the Sharp Park Golf Course be proposed, they would undergo a separate regulatory review, including CEQA environmental review;" and

WHEREAS, Alternative A18 was nonetheless inserted into the long-standing SNRAMP CEQA review process as a new, additional SNRAMP project when the SNRAMP DEIR was released in August 2011; and

WHEREAS, Sharp Park is the only Natural Area that the DEIR studies at the project-level, which means Alternative A18 will have completed its entire CEQA requirements if the SNRAMP DEIR is adopted as final, while the City's 31 other Natural Areas will require subsequent, project-specific environmental review before their proposed projects are implemented;
WHEREAS, with the exception of Alternative A18, all feasible alternative management regimes for Sharp Park were excluded from consideration in the DEIR because it characterizes the golf course as an historic resource for purposes of CEQA, despite the San Francisco Historic Preservation Commission's contrary determination; and

WHEREAS, Alternative A18 should be subject to a separate and complete environmental evaluation;

NOW, THEREFORE BE IT RESOLVED that the Board of Directors of Sequoia Audubon supports removing all Sharp Park Golf Course projects and management proposals derived from Alternative A18 from the SNRAMP EIR process, and if they are not so removed, Sequoia Audubon will oppose passage of the SNRAMP EIR.

Sincerely,

Sue Cossins
Administrative Assistant
For the Sequoia Audubon Society Board of Directors

San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, City Hall, Room 244
San Francisco, CA 94102-4689

Dear Board of Supervisors,
I am writing to inform you that unless all Sharp Park Golf Course redevelopment projects and management proposals derived from A18 are removed from the SNRAMP CEQA process, SAVE THE FROGS! will oppose SNRAMP's approval. We have reached this conclusion after carefully weighing the SNRAMP's conservation benefits against the environmental harm that will be wrought by A18. It is clear that the proposed conservation benefits SRNAMP may bring to the City's other natural areas are greatly outweighed by the concrete harms that A18 will impose on Sharp Park's amphibians.

This conclusion is based on, among other considerations, (a) the fact that the natural areas program, which we support in principle, already has authority to implement the DEIR's proposed conservation projects in most of the City's natural areas, and therefore adopting the SNRAMP DEIR as currently proposed will provide no additional conservation benefit to these areas; (b) the few areas were additional conservation gains would be authorized are analyzed only at the "program" level, which means some subsequent, significant environmental review document will be required before those projects move forward, making those projects subject to further delay, expense, and uncertainty; and (c) the Sharp Park Golf Course redevelopment project, in contrast, is analyzed at the "project" level and would therefore not require additional CEQA review before it is implemented: and yet A18 was not subject to all of CEQA's required review procedures and not a single alternative to A18 was considered in the DEIR.

A18 has been heavily criticized by scientists, conservation groups, and community park advocates in both 2009 and 2011 because of its harmful impacts on imperiled wildlife and the economic sustainability of the Recreation and Park Department. SAVE THE FROGS! is not willing to sacrifice Sharp Park, unquestionably the Recreation and Park Department's most ecologically and biologically important natural area, to this ill-conceived project for a vague promise of conservation benefits in other areas. Yet this is what SNRAMP DEIR's preferred alternative currently offers. The vast majority of California's wetlands have been destroyed; Sharp Park is home to federally protected, endangered California Red-Legged Frogs (*Rana draytonii*), an iconic amphibian that the Board of Supervisors should work to protect, rather than to kill, harm and harass, which is what happens when the City pumps the Sharp Park Wetlands out to sea and their egg masses get stranded on dry land.

I therefore reiterate that SAVE THE FROGS! will oppose adoption of the SNRAMP DEIR unless all Sharp Park Golf Course redevelopment projects and management proposals derived from A18 are removed from the SNRAMP CEQA process.
Sincerely,

Kerry Kriger

Dr. Kerry Kriger

15-June-2014

SAVE THE FROGS!

Dr. Kerry Kriger
Executive Director
831-621-6215

2524 San Pablo Avenue
Berkeley, CA 94702 USA
E-mail: kerry@savethefrogs.com

savethefrogs.com

August 13, 2014

Phil Ginsburg
General Manager
San Francisco Recreation and Park Department
McLaren Lodge-Golden Gate Park
501 Stanyan St.
San Francisco, CA 94117

Re: Significant Natural Resource Areas Management Plan

Dear General Manager Ginsburg,

The National Parks Conservation Association (NPCA) has been and continues to be a supporter of the City's Natural Areas and its Natural Areas Program, which is one component of a larger conservation strategy in the Bay Area that includes city, state and federal parks.

However, we have grave concerns about the California Environmental Quality Act ("CEQA") review process for the Significant Natural Resource Areas Management Plan ("SNRAMP"). Indeed, we have consistently and repeatedly objected to the City's decision to insert a project known as "A18," the Sharp Park Golf Course redevelopment project, into the SNRAMP EIR process.

To date, the City has not taken any action to address this concern. This is perplexing, as our request is entirely consistent with the City's November 2009 Scoping Report for the SNRAMP CEQA process, which stated:

> [b]ecause redesigning or eliminating the Sharp Park Golf Course is a separate proposal being studied by SFRPD, it will not be included or evaluated as part of the proposed SNRAMP project analyzed in the EIR. Should changes to the Sharp Park Golf Course be proposed, they would undergo a separate regulatory review, including CEQA environmental review.

We write today to reiterate that unless all Sharp Park Golf Course redevelopment projects and management proposals derived from A18 are removed from the SNRAMP CEQA process the NPCA will oppose SNRAMP's approval. In contrast, if the City were to revert to the original SNRAMP project for Sharp

Park—i.e., the project proposed in the 2006 Final Draft SNRAMP—the NPCA will strongly support SNRAMP's adoption.

We have reached this conclusion after carefully weighing the SNRAMP's conservation benefits against the environmental harm that will be wrought by A18. It is clear that the proposed conservation benefits SRNAMP may bring to the City's other natural areas are greatly outweighed by the concrete harms that A18 will impose on Sharp Park.

This conclusion is based on, among other considerations, (a) the fact that the natural areas program, already has authority to implement the DEIR's proposed conservation projects in most of the City's natural areas, and therefore adopting the SNRAMP DEIR as currently proposed will provide no additional conservation benefit to these areas; (b) the few areas were additional conservation gains would be authorized are analyzed only at the "program" level, which means some subsequent, significant environmental review document will be required before those projects move forward, making those projects subject to further delay, expense, and uncertainty; and (c) the Sharp Park Golf Course redevelopment project, in contrast, is analyzed at the "project" level and would therefore not require additional CEQA review before it is implemented: and yet A18 was not subject to all of CEQA's required review procedures and not a single alternative to A18 was considered in the DEIR.

A18 has been heavily criticized by scientists, conservation groups, and community park advocates in both 2009 and 2011 because of its harmful impacts on imperiled wildlife and the economic sustainability of the Recreation and Park Department. NPCA is not willing to sacrifice Sharp Park, unquestionably the Recreation and Park Department's most ecologically and biologically important natural area, to this ill-conceived project for a vague promise of conservation benefits in other areas. Yet this is what SNRAMP DEIR's preferred alternative currently offers.

We therefore reiterate that we will oppose adoption of the SNRAMP DEIR unless all Sharp Park Golf Course redevelopment projects and management proposals derived from A18 are removed from the SNRAMP CEQA process.

Sincerely,

Neal Desai

Neal Desai
Pacific Region Field Director
National Parks Conservation Association

inspiring people to protect Bay Area birds since 1917

April 10, 2015

Phil Ginsburg, General Manager
San Francisco Park & Recreation Department
501 Stanyan Street
San Francisco, CA 94117

Dear Mr. Ginsburg:

Golden Gate Audubon would like to reiterate its opposition to elements of Sharp Park development and management which have been included in the Significant Natural Resources Areas Management Plan (SNRAMP) and the associated SNRAMP Environmental Impact Review (EIR). We urge you to move forward with the excellent protection and programs under the SNRAMP for the originally indicated natural areas in the city, but urge you to remove the Sharp Park elements (Alternative A18) which merit further intensive review and vetting, as outlined below.

The SNRAMP is designed to guide management activities and improvement of dozens of important city-owned properties in San Francisco that include critical habitat fragments and special species. For decades, SNRAMP has been envisioned and developed with thoughtful guidance from many stakeholders, including SF RPD and the conservation community. However, the rather late inclusion of Alternative A18 (Sharp Park) has severely compromised what would otherwise be unambiguously strong support of the environmental community for SNRAMP.

Why Sharp Park is different and does not belong in SRNAMP:

- Sharp Park is not within the City and County limits of San Francisco and this area's management has repercussions for contiguous habitat parcels of other jurisdictions, who have not participated in review processes to date.
- Alternative A18 is primarily concerned with sustaining an artificial amenity: a golf course, rather than effectively managing for a coastal wetland ecosystem. As the operation the golf course is not consistent with the purpose of SNRAMP, including Sharp Park undermines SNRAMP's integrity.
- Sharp Park is the only parcel in SNRAMP EIR known to host native *vertebrate* species which are federally-listed under the Endangered Species Act. Two resident native vertebrate species: the threatened California Red-legged Frog and the endangered San Francisco Garter Snake are well known to be

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experiencing perilous rates of decline throughout their ranges. The San Francisco Garter Snake has a quite limited and fragmented range due, in part, to the unfortunate history of draining coastal wetlands. Sharp Park is one of very few places where the San Francisco Garter Snake's survival as a species could be achieved with substantive focus on coastal wetland ecology. Sharp Park merits its own independent CEQA review for its unique conservation importance but also for the opportunity this San Mateo County property offers as a unique venue for the public to discover coastal wetland ecology and see rare animals. It would be shameful, and ironic, to say the least, if it were the City of San Francisco that effectively signed the death warrant for the beautiful snake sharing its namesake - by inadequately preserving habitat which serves as this particular endangered species last stronghold on Earth -- under the umbrella of a Significant Natural Resource Areas Management Plan EIR.

- Although SNRAMP planning has taken place since 1995, the Sharp Park Alternative A18 was not formally included until after 2009. As such, it has not received anything like equal or adequate environmental and public review.

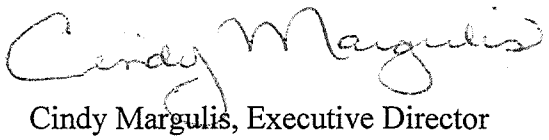
- Because the project elements at Sharp Park have not been properly studied nor sufficiently vetted by all relevant stakeholders, it should not be approved without separate review and public input. Yet, adoption of the final DEIR could effectively fast track the implementation of irreversible destructive management practices at Sharp Park simply because A18 is considered at the Project Level. While the 31 other projects are only approved at the program level, each of those 31 other projects have received more careful review than A18. It suggests that the City's late inclusion of Alternative A18 effectively circumvented a truly comprehensive review process under CEQA for Sharp Park projects. This rightly raises suspicion among the environmental community and has invoked opposition to SNRAMP that would not exist if Option A18 were simply removed from the SNRAMP EIR.

- Because Sharp Park is managed primarily as a golf course, it is not in fact being managed as a natural resource area. Therefore, it does not, by definition, belong to the collection of properties contemplated by the SNRAMP EIR. Furthermore, the water buttressing impacts, severe draining regimens, and vegetation removal required for artificially sustaining the golf course are deeply disruptive for a coastal wetland ecosystem – and compromise crucial habitat for the San Francisco Garter Snake and the Red-Legged Frog.

Given the many concerns (presence of federally listed species, insufficiency in time, and substance and scope of review, mismatched management objectives for that property, and a divided conservation community, we urge you to REMOVE Sharp Park Alternative A18 from the SNRAMP-EIR. Doing so, will enable the City to earn back strong support from the conservation community for the rest of the projects contemplated under SNRAMP.

Our concerns about the A18 project element had been lodged separately, earlier, during the appropriate comment period. However, by insisting on the inappropriate inclusion of A18, the City has unwittingly broadened and strengthened opposition to SNRAMP and the entire Natural Areas Program. Without Alternative A18, SNRAMP may be deemed the most thoughtful and powerful urban conservation initiative anywhere in the world. Yet, the misguided inclusion of A18 undermines the integrity of SNRAMP and alienates support from environmental organizations that would otherwise be its champions. We urge you to remove A18.

Sincerely Yours,



Cindy Margulis, Executive Director

CC: San Francisco Mayor Ed Lee
SF Board of Supervisors

inspiring people to protect
Bay Area birds since 1917

December 12, 2016

Mark Buell, Commission President
Recreation and Parks Commission
Recpark.Commission@sfgov.org

Rodney Fong, Commission President
Planning Commission
Commissions.Secretary@sfgov.org

RE: Natural Areas Program EIR

Dear Commissioners:

Our thousands of Audubon members enjoy birdwatching, wildlife viewing, nature study, ecology, citizen science, volunteering, habitat restoration, stewardship, etc. — all opportunities that the Natural Areas Program offers. For 15 years, SNRAMP has been envisioned and developed to protect natural areas within the city and make them accessible to people. SNRAMP is meant to **guide management activities that will improve dozens of important San Francisco properties that include critical habitat fragments, special native species, and even critically endangered species.**

While most of the city landscape is concrete, buildings, roads, and other urban development, the Recreation and Park Department manages approximately 230 parks of various sizes, totaling about 3,500 acres. Only 1,100 acres confined to 31 of these parks are deemed to contain *significant natural areas*, which are the unique natural heritage of San Francisco. This is **less than 3.6% of the total city area that must do the job of preserving the many species of plants and animals that struggle to persist in our city.**

San Francisco has a stunningly beautiful and unique biological history and heritage. City-managed lands host differing weather regimes and soils, and we have diverse communities of plants and animals ranging from SF Bay coastline to live oak woodland, mature forest, vernal pool and prairie, to coast chaparral. Our native plants and animals have evolved over millions of years to thrive under distinct sets of conditions. To survive, they need us to notice them, learn about them, appreciate them, and ultimately commit to preserving them. Having this beauty and biological diversity within a 48-square-mile city is truly a very rare treasure! This amount of diversity is a public value that deserves diligent and dutiful stewardship. Future generations will grow up exploring and loving these natural areas, and this will create our future stewards for the unique natural heritage of San Francisco.

While we support the intention of the SNRAMP plan and its relevant projects for numerous city parks, we are profoundly troubled by the inclusion of the Sharp Park Golf Course, which conspicuously fails to cohere to the fundamental objectives of the overall SNRAMP plan. Alternative A18 (Sharp Park), which was added very late in the long-standing effort to draft SNRAMP and was added in direct contradiction of the promises of the City to consider that project separately, is principally just a very costly Golf Course

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redevelopment plan. There are many reasons why this does not belong in the SNRAMP EIR – not the least of all that it is to be re-developed and managed *primarily* as a golf course (not as a natural area)! The Golf Course is **not free to the public** to be widely enjoyed (it'll only be open to paying golfers). Redeveloping and maintaining this particular golf course requires management practices, including **draining the natural wetland and constant mowing which severely negatively impact two critically endangered vertebrate species** on this property located in San Mateo County: the SF Garter Snake and California Red-legged Frog. This Golf Course will continue to use pesticides at levels not appropriate in other Natural Areas. **Pretending that environmentally responsible redevelopment of this particular Golf Course would be possible -- in this era of increasing knowledge of sea-level rise and rates of coastal erosion -- is folly. Surely, San Francisco officials are smart enough to recognize that expensive efforts to keep this Golf Course are woefully short-sighted and may have permanently damaging consequences for these endangered species' survival. The City should remove the Golf Course elements to ensure this EIR is true to its stated purpose: preserving this city's natural areas.**

Including the area to be redeveloped as the Sharp Park Golf Course contradicts the conservation objectives of the Natural Areas plan and compromised what would otherwise be unambiguously strong support from the environmental community. Furthermore, in the near future it will be critical to raise money for numerous SNRAMP projects, which are not yet funded. We believe that fundraising for authentic conservation cannot be achieved if the city intends to use those very same funds to support an expensive-to-renovate and increasingly expensive-to-operate golf-course which poses a persistent threat to two endangered species.

Golden Gate Audubon is committed to advocating for the SNRAMP plan in SF's city parks, which we view as a significant commitment to maintaining native biodiversity in this city. But we strenuously object to the inclusion of Sharp Park Golf Course elements, which really are not "natural area conservation" and are not even located within the City of San Francisco. **We hope that you will certify the SNRAMP EIR *excluding* the functional Golf Course areas at Sharp Park and, instead, adopt the SNRAMP plan for the protection of the genuine natural areas of San Francisco.**

Sincerely,

Cindy Margulis

Cindy Margulis
Executive Director

Audubon CALIFORNIA

400 Capitol Mall, Suite 400
Sacramento, CA 95814
Tel. (916) 737-5707 ext. 102
mlynes@audubon.org

December 15, 2016

John Rahaim, Director and Planning Commissioners
San Francisco Planning Department
1650 Mission St #400
San Francisco, CA 94103

Re: Sharp Park and the Significant Natural Resource Areas Management Plan (SNRAMP) EIR

Dear Director Rahaim and Planning Commissioners:

Audubon California[1] writes to strongly urge the San Francisco Planning Department to remove the Sharp Park Golf course redevelopment and management project from the San Francisco Significant Natural Areas Management Program (SNRAMP) Environmental Impact Report (EIR). The golf course project is directly at odds with the purpose and goals of the SNRAMP, creates greater threats to the San Francisco garter snake and the California red-legged frog populations, and its inclusion threatens the entire program.

San Francisco considers itself one of the greenest cities in the United States. The SNRAMP program is, on the whole, worthy of support and recognition. However, despite broad and persistent opposition from the conservation community, San Francisco continues to include a redevelopment project for a golf course that threatens two endangered species in a program specifically dedicated to protecting and enhancing local biodiversity.

We remind you that in the November 2009 Scoping Report for the SNRAMP process stated:

> Because redesigning or eliminating the Sharp Park Golf Course is a separate proposal being studied by SFRPD, it will not be included or evaluated as part of the proposed SNRAMP project analyzed in the EIR. Should changes to the Sharp Park Golf Course be proposed, **they would undergo a separate regulatory review**, including CEQA environmental review. (emphasis added)

The decision to depart from the 2009 Scoping Report appears to be a tacit acknowledgement by the Recreation and Parks Department that the controversial golf course redevelopment program would not pass muster under the California Environmental Quality Act (CEQA) if

[1] These comments are submitted on behalf of Audubon California, the state office of the National Audubon Society. Separate comments have already been submitted and/or will be submitted by Sequoia Audubon Society and Golden Gate Audubon Society, which are independent chapters of National Audubon, each with their own policies and positions related to Sharp Park. The National Audubon Society and its chapters should not be confused with "Audubon International", which is a separate entity funded in part by the U.S. Golf Association and that collects fees to "certify" developments such as golf courses and resorts as "bird-friendly" despite frequent opposition from conservation organizations.

analyzed on its own. Therefore, Sharp Park was included as part of the SNRAMP to push it through as part of a broader package that would reduce opposition to the project.

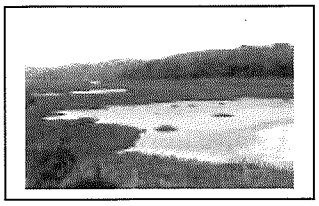
Now more than ever, San Francisco should lead by example in developing environmental policy and protecting local biodiversity. The Natural Areas Program is an excellent example of that leadership. It should not be diminished and potentially derailed by a cynical attempt to ram an expensive and environmentally-harmful golf course project through the CEQA process.

Therefore, Audubon California opposes certification of the SNRAMP Draft EIR unless the Sharp Park Golf Course redevelopment and management projects are removed. Please help the SNRAMP process continue unhindered and let the Sharp Park proposals be evaluated on their own merits in a separate CEQA process.

Thank you for consideration of our comments. If you have any questions, please do not hesitate to contact me at mlynes@audubon.org.

Respectfully submitted,

Michael Lynes
Director of Public Policy
Audubon California



Peter R. Baye, Ph.D.
Coastal Ecologist, Botanist
33660 Annapolis Road
Annapolis, California 95412

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California Coastal Commission
Stephanie Rexing, Coastal Planner
45 Fremont Street, Suite 2000
San Francisco, CA 94015

January 5, 2016

SUBJECT: Observations of apparent major long-term patterns of salinity intrusion indicators, north-western Sharp Park; relationship to modification of authorized drainage of Laguna Salada, Pacifica, San Mateo Co. (CDP 2-012-014)

Dear Ms. Rexing:

I would like to provide you with some observations of large-scale, conspicuous, and ecologically significant salinity intrusion indicators in vegetation and soil at Sharp Park. I am submitting these for your consideration in ongoing regulatory management of Sharp Park. Salinity intrusion patterns evident at the surface soil and vegetation are relevant to pumping and drainage of Laguna Salada that lowers Sharp Park groundwater elevations relative to the saline beach groundwater lens that is "pumped" by wave runup on the beachface.

Attached are annotated photos of greatly expanded dieback zones (apparently more than 2 acres) of irrigated turfgrass, and patches of salt-tolerant weeds (halophytes) in November 2015, and previous direct evidence of capillary efflorescence of salts in turgrass depressions and flats dating from 2010 (soon after they became conspicuous). Most of the turfgrass landward of the barrier beach at the northwest end of Sharp Park exhibited mass dieback this year. This acute dieback contrasted sharply with adjacent turfgrass at slightly higher elevation, or slightly or landward of zone of apparent shallow brackish groundwater influence.

The 2010 observations of incipient salinity intrusion provide direct evidence of salt efflorescence at the soil surface in depressions where the dieback zones initiated, as well as rapid colonization by non-native halophytes (salt-tolerant weeds) that replaced barrens left by dead turfgrass. As you know, turfgrass is physiologically unable to cope with soil salt levels so high that they visibly accumulate as crystalline salt crusts at the soil surface between rains or irrigation episodes. These patterns are not consistent with any other mechanism of salt transport, such as salt spray deposition (minimized in lee of a barrier, and at the ground surface).

As sea level rises, wave runup and beach elevations rise relative to the water surface elevation of Laguna Salada. Thus, groundwater gradients between the sandy barrier beach (underlying the artificial earthen berm) should be expected to steepen towards Laguna Salada as long as it is

pumped to elevations lower than beach groundwater. The lower the lagoon is pumped relative to beach groundwater levels, the steeper the saline groundwater gradient is likely to become – along with the magnitude of salinity intrusion impacts. The dramatic localized expansion of the turfgrass dieback from local depressions in 2010, to mass dieback of the entire western turfgrass zone in 2015, is consistent with a significant long-term adverse increase in salinity intrusion from shallow brackish groundwater flow from the beach toward the drained low lagoon. The details of the patterns of dieback gradient and salt efflorescence along the historical footprint of the sand barrier beach are also consistent with a pattern of shallow brackish groundwater intrusion from the beach, expressed as a zone of capillary rise of soil salts in low elevation areas. This pattern is probably magnified and revealed by the drought, which has reduced dilution of beach groundwater salts.

The fringing marsh (wetlands) at some western the Laguna Salada shoreline segments is also apparently exhibiting localized patterns of dieback consistent with increased salinity intrusion. The eastern shore marsh of Laguna Salada exhibits no salt dieback patterns (just low water level vegetation indicators), but there is unprecedented dieback of bulrush, rush, and stunting of tules, along with expansion of saltgrass, on the south lobe of the relict washover fan. This is consistent with increased salt stress in wetland vegetation, which I have not observed in past droughts. These are obviously not simply drought patterns of physiological wetland vegetation stress, because they are highly asymmetric across the lagoon.

Salinity intrusion at Sharp Park is a long-term management problem for wetland management, water quality, and turfgrass maintenance feasibility. Prof. Rosemary Knight (Stanford University, GEM – Center for Groundwater Evaluation and Management https://gemcenter.stanford.edu/) has developed efficient and definitive imaging methods (Electrical Resistivity Tomography) for measuring salinity intrusion in shallow coastal groundwater in Central California and elsewhere. I recommend that the Commission fully consider requiring monitoring of groundwater and salinity intrusion with such methods in order to constrain impacts of lagoon drainage (pumping) as sea level rises. In addition, as the Commission modifies the Coastal Development Permit conditions for Sharp Park related to pumping, I would recommend requiring well-distributed year-round sampling (multiple transects) of soil salinity and vegetation, from the soil surface to groundwater capillary fringe, across the backbarrier zones exhibiting long-term patterns of turfgrass dieback.

Thank you for your consideration and efforts to balance public interest in wetland conservation, water quality, and coastal recreation in your administration of the Sharp Park CDP.

Respectfully submitted,

Peter R. Baye, Ph.D.

Cc:

Peter R. Baye
Coastal Ecologist
baye@earthlink.net

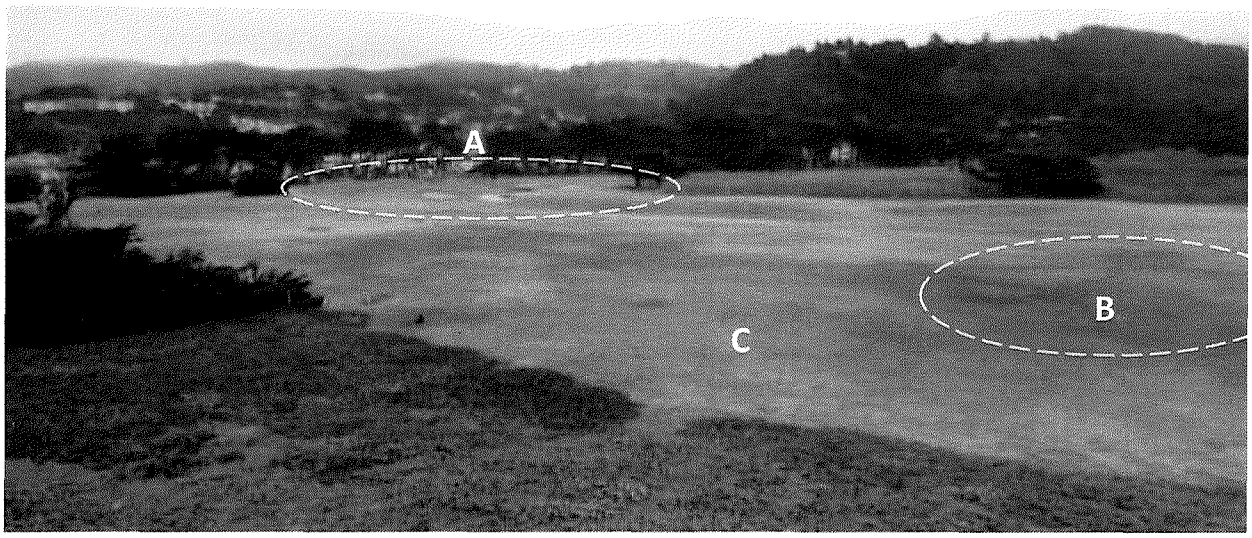
John Dixon, California Coastal Commission
Nancy Cave, California Coastal Commission
Bob Battalio, Chief Engineer, ESA, San Francisco
Greg Kamman, KHE Hydrology, San Rafael
(Attachment)

ATTACHMENT

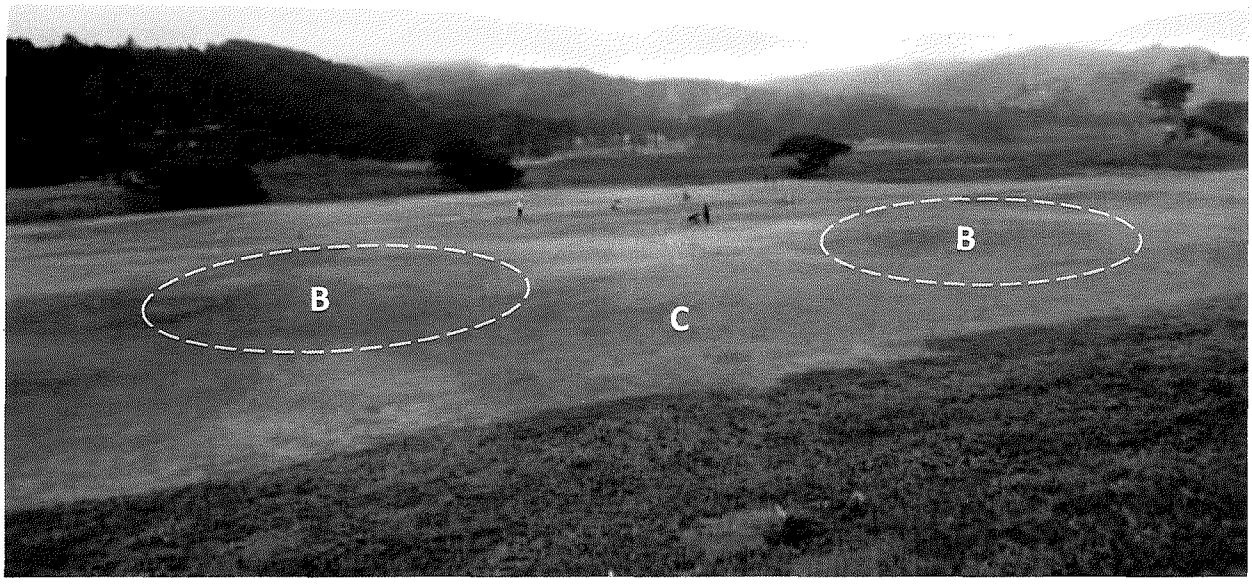
Peter R. Baye
Coastal Ecologist
baye@earthlink.net

Observations of salinity intrusion patterns evident in turfgrass dieback, halophyte (salt-tolerant plant) colonization, and salt efflorescence at Northwestern Sharp Park, 2010-2015.

1. Sharp Park northwestern turfgrass dieback patterns: 2015



Northwestern Sharp Park turfgrass exhibiting almost complete dieback in topographic lows (flats and swales close to groundwater level indicated by lagoon water surface; C) behind barrier beach. Note contrasting green turfgrass on landward mounds in background (A) and seaward depressions colonized by salt-tolerant weeds (B). Iceplant (*Carpobrotus edulis* x *chilensis*) in foreground. November 25, 2015.



Nearly complete dieback of turfgrass landward of Salada barrier beach and dike (C). Green vegetation in lowest depressions (B) is composed of salt tolerant weeds identified in 2010, including spurrey (*Spergularia* spp.) and staghorn plantain (*Plantago coronopus*) rather than turfgrass species. November 25, 2015.

Peter R. Baye
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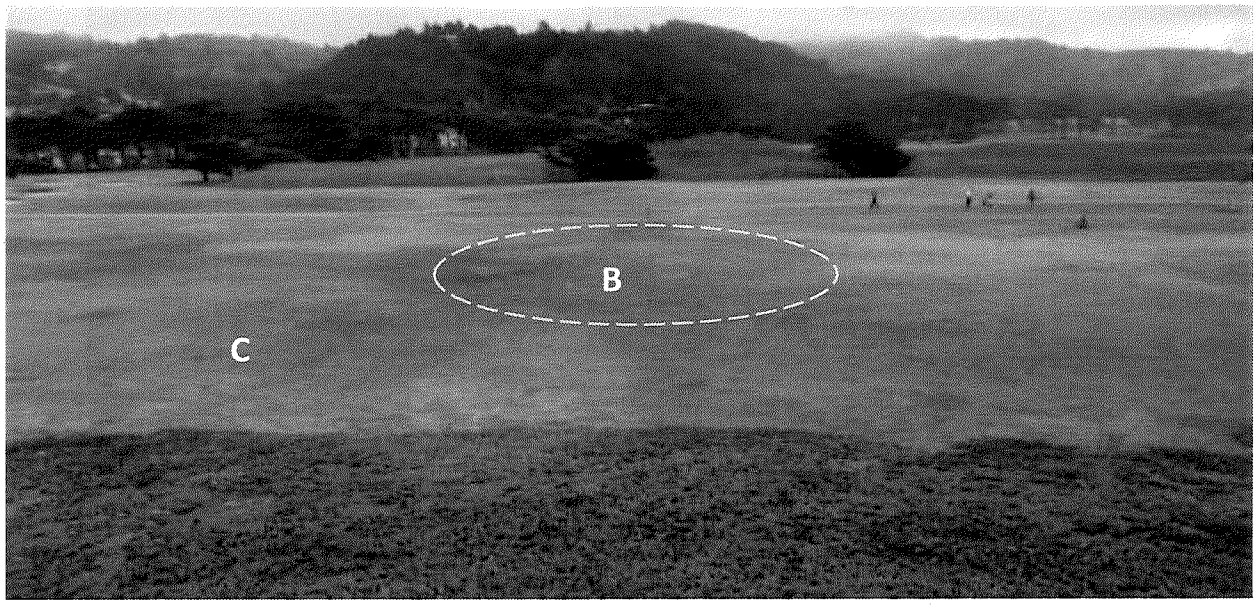
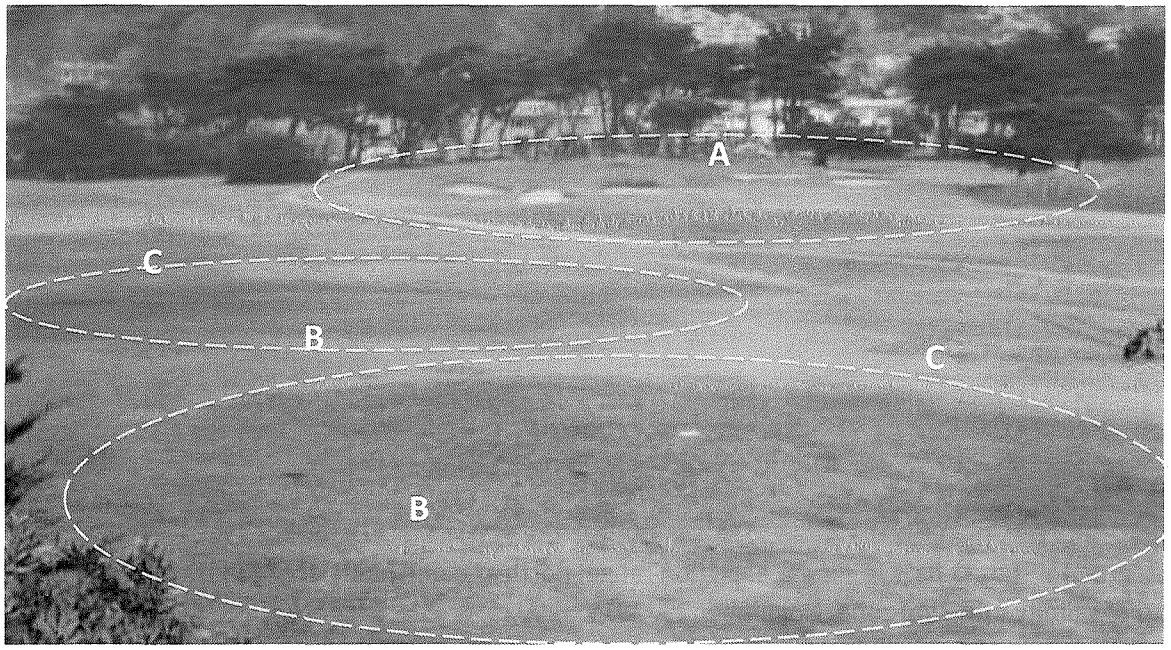


Nearly complete dieback of turfgrass landward of Salada barrier beach and dike (C). Green vegetation in lowest depressions (B) is composed of salt tolerant weeds identified in 2010, including spurrey (*Spergularia* spp.) and staghorn plantain (*Plantago coronopus*) rather than turfgrass species. November 25, 2015.

Contrast: green turfgrass flats at similar elevation range, north and northeast of Laguna Salada, landward of salinity intrusion zone. November 25, 2015.

Peter R. Baye
Coastal Ecologist
baye@earthlink.net

Green turfgrass landward and above salinity intrusion zone (A - sand trap topographic highs, background) and yellow-green salt-tolerant weeds in lowest, most saline depressions (A – foreground). Matrix: (C) salt-killed brown-gray turfgrass litter. November 25, 2015.



Green turfgrass landward and above salinity intrusion zone (A - sand trap topographic highs, background) and yellow-green salt-tolerant weeds in lowest, most saline depressions (A – foreground). Matrix: (C) salt-killed brown-gray turfgrass litter. November 25, 2015.

Peter R. Baye
Coastal Ecologist
baye@earthlink.net

Conspicuous narrow transition zone between salinity intrusion (turfgrass dieback, capillary transport of salt from shallow brackish groundwater, C) and drained, non-saline turfgrass on rolling topography (higher elevation) landward of salinity intrusion zone (A). November 25, 2015.

Corresponding wetland vegetation impacts of salinity intrusion, western central shore of Laguna Salada: dieback of rushes and bulrushes (*Juncus lescurii, Schoenoplectus pungens*) and stunted tules (*S. californicus*) on seaward fringing marsh. Green low vegetation at emergent bed of low lagoon includes rapidly growing salt-tolerant saltgrass (*Distichlis spicata*). November 25, 2015.

Peter R. Baye
Coastal Ecologist
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2. Incipient salinity intrusion patterns at NW Sharp Park prior to drought: 2010

Depressions in turgrass flats landward of the barrier beach are the first areas to exhibit acute salinity symptoms in 2010: acute recent dieback of turfgrass with sharp boundaries related to topography and drainage, salt efflorescence at surface of soil and leaf litter, and initial colonization of barrens by salt-tolerant weeds. Surrounding matrix of turfgrass remains green above depressions; no contrast between landward and seaward turfgrass dieback outside depressions. Incipient dieback (browning) of turfgrass is evident in shallower depressions. March 27, 2010.

Sharp boundaries and surface expression of capillary rise and efflorescence of salt from shallow groundwater in depressional topography of northwest golf course. White surface is salt efflorescence on dead grass litter and soil. Light brown is dead turfgrass litter; darker brown is prostrate broadleaf weedy

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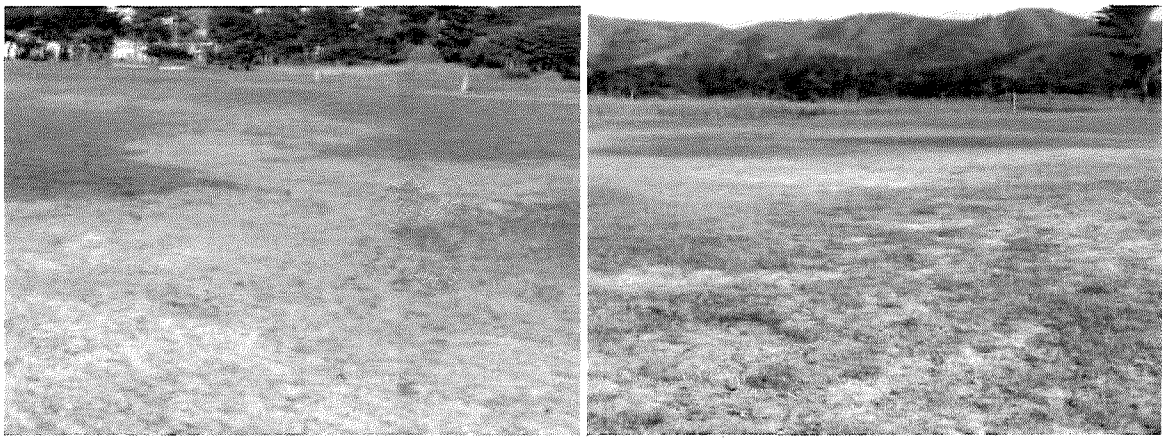
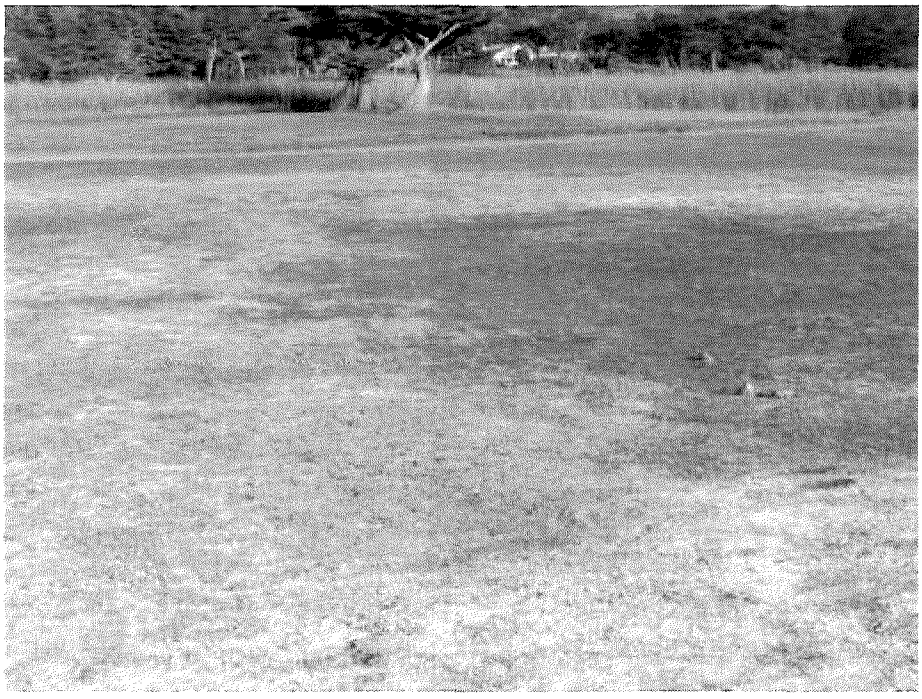
vegetation intolerant of salt, accumulated prior to expansion of populations of salt-tolerant weed species. March 27, 2010.



Sharp boundaries and surface expression of capillary rise and efflorescence of salt from shallow groundwater in depressional topography of northwest golf course. White surface in foreground is salt efflorescence on dead grass litter and soil. Light brown is dead turfgrass litter; darker brown is prostrate broadleaf weedy vegetation intolerant of salt, accumulated prior to expansion of populations of salt-tolerant weed species. March 27, 2010.



Surface expression of capillary rise and efflorescence of salt from shallow groundwater in depression at northwest golf course. White surface in foreground is salt efflorescence on dead grass litter and soil. Light brown at edge of dieback zone is dead turfgrass litter; darker brown in center is prostrate broadleaf weedy vegetation intolerant of salt, accumulated prior to expansion of populations of salt-tolerant weed species. March 27, 2010

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Detail of salt efflorescence (fine crystalline crust) on soil surface and leaf litter of barren area in depressional turfgrass dieback zone. March 27, 2010

Establishment of salt-tolerant weeds in salt efflorescence patches within turfgrass dieback zone – seedings and mature rosettes of staghorn plaintain (*Plantago coronopus*), only patchy in turfgrass dieback barrens in 2010. March 27, 2010. Later expansion of this and other salt-tolerant weed populations in depressions reversed the green/dieback pattern in 2015, apparently restricting green to the salt-tolerant weeds of the depressions where salt and moisture concentrate, and leaving dead turfgrass in new areas reaching lethal soil salt levels.

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Establishment of salt-tolerant weeds in salt efflorescence patches within turfgrass dieback zone: spurrey (*Spergularia* sp., likely *S. bocconii*), in early stages of colonization in barrens in 2010. March 27, 2010.

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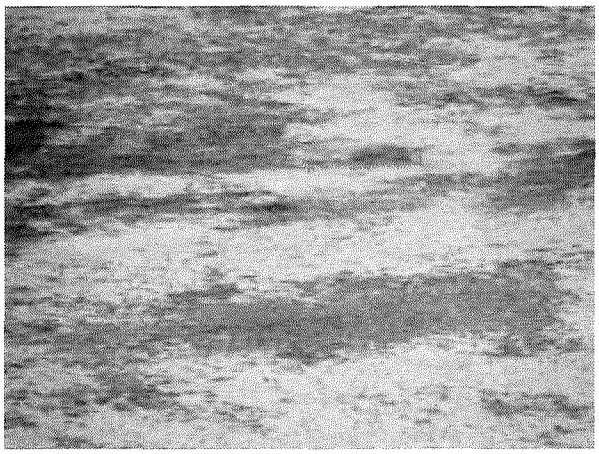

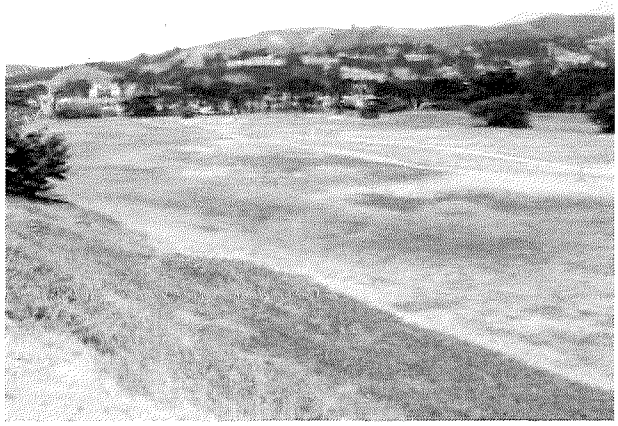

Persistence of localized depressional turfgrass dieback areas in 2010, within matrix of irrigated turfgrass. June 10 2010.

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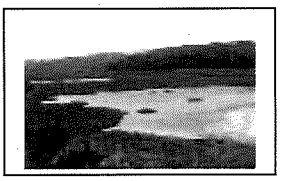

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MEMORANDUM

To: Stephanie Rexing, California Coastal Commission – North Central Coast

Date: April 16, 2015

SUBJECT: Sharp Park Project Project, 2-12-014, California Coastal Commission staff report and addendum: formulation and assessment of feasible alternatives to wetland dredging; technical clarifications.

Dear Ms. Rexing:

After reviewing the Staff Report (April 3, 2015) and Addendum (April 15, 2015) for the Sharp Park Infrastructure project, I would like to provide some clarifications regarding some major and minor technical issues regarding wetland ecology and management. I hope this will help correct some apparent confusion regarding formulation and assessment of feasible alternatives to dredging marsh as a means of increasing open water/marsh edge habitat, and reversing progressive spread of tules and cattail marsh into shallow open water habitats at Laguna Salada.

I am submitting the comments below not as an opponent or proponent of the project, nor on behalf of other project opponents or proponents. My main aim is to help clarify what a potentially feasible alternative to wetland dredging actually would be and how it would work, so that it can be meaningfully assessed for Coastal Act policy compliance (including conflict resolution procedures). I think I can outline a very simple, scientifically sound and feasible alternative to dredging based on modest seasonally timed (winter-spring-early summer) increases in mean lagoon water levels on the order of only 1 to 2 feet above current target levels, which are *feasible* (water levels not associated with golf course closure in recent years), even though they may not be the applicant's *preferred* alternative.

1. Alternatives to dredging marsh to maintain open water/marsh edge

The version of the water level management alternative assessed in the staff report has become distorted as a "straw-man" alternative, needlessly burdened with an infeasible premise of excessively high water levels (near 12 ft NAVD) that have not actually been proposed, even in a wetland restoration context.

> ...water levels required for such a process would be up to three to four feet **higher than the very highest winter/spring flooding ever recorded** to have occurred at the Golf Course (see above, 12 feet NAVD88 inundation line on Figure 1), effectually closing down the entire Golf Course for a longer duration of time. Staff Report p. 24; bold added for emphasis)

Please note that this description of the water management alternative, which raises water levels 3-4 ft above the *highest* flood levels above the *upper lagoon wetland edge*, is inconsistent with the Staff Report's account of the water management alternative on page 34, which raises water levels *above the submerged lagoon bed* at the *lower edge of marsh vegetation* to reach a minimum submergence depth of 4 feet. This confusion about the upper and lower reference positions for water level changes completely distorts the alternative.

> 2) Flooding of the Vegetation
> Project opponents suggest "conventional" water depth management of the marsh and ponds. This entails raising the amount of water **around the lower edges of tules and cattails** from 2 to 4 feet deep **to a minimum of 4 feet deep**. The alternative also calls for amphibious equipment to mow tules and cattails to stumps before the winter flooding and frog breeding season begins. Opponents assert the submerged tule and cattail stumps will die off due to the lack of oxygen, solving the problem of emergent vegetation. (Staff Report p. 34)

I know of no scientific justification for assuming a 4-5 ft increase in lagoon water levels to 12 ft NAVD to achieve reduction of tule and cattail spread. Raising lagoon water levels to 12 ft NAVD would not only be physically infeasible over the summer, it would submerge even the uppermost marsh in about 3 feet of water, which is near the limit of tule and cattail flooding tolerance. That would constitute an absurd "overkill" straw-man alternative that would drown most of the existing Laguna Salada marsh into open water – an alternative designed to fail and cause unjustifiable impacts while overshooting the aim of increasing open water area commensurate with the proposed marsh dredging.

Instead, to achieve a modest increase of open water habitat and retreat of lower marsh edges commensurate with (or moderately greater than) proposed marsh dredging, a 1 to 2 ft rise in target winter-early summer water levels by reducing pumping, with inevitable gradual summer drawdown (due to natural seepage outflow and evapotranspiration, not pumping), should be considered. This would mean target water levels triggering pumping to rise to only about 8-9 ft NAVD, not 12 ft, during winter, spring, and early summer.

To drown out the edge of tules and cattails along the lower (deepest) end of the depth gradient they can tolerate near the open water edge under existing conditions, there is simply no need to maintain a super-elevated 12 ft NAVD constant lagoon water level all year or even part of the year. Tule and cattail "drowning" in the wetland zone now near their limit of tolerance – 3-4 ft deep water zones during the wet winter season and much of the

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growing season -- could occur by raising water levels only 1-2 ft deep, making the same zone 4-5 ft deep over winter and spring. This would exceed their limits of tolerance for high survivorship (regrowth), even if drawdown of water levels below limits of submergence tolerance later occur by mid-summer.

This drowning-dieback management method – flooding out cattails and tules by controlled episodes of excessive water levels for part of the year – is a conventional marsh habitat management method that predates wetland ecology as a science. It also emulates natural processes of among-year and between-season fluctuations in non-tidal lagoon water levels, which naturally keep dominant low marsh species like tules and cattails in check. Thus, it does not matter if shallow water conditions occasionally occur in drought years or multi-year droughts, as long as occasional wet years with prolonged high water stands around 8-9 ft during the winter and growing season occur.

The longer periods of deeper submergence along the lagoon depth gradient is what holds tules and cattails in check. All coastal lagoons usually draw usually down gradually during the summer evaporation period. They tend to equilibrate or "bottom out" as they approach the elevation of beach groundwater as freshwater inflows from groundwater and streams decline. But *starting* the marsh growing season at the bottom (shallow lagoon low stand, late summer-like low water) even at the start of growth in earliest spring – unleashes the progressive tule spread that the applicant is trying to address with dredging instead of managing them with naturalistic seasonally higher fluctuating water levels

As for aquatic mowing of low marsh near the open water edge (cutting tule and cattail shoots at their bases in fall, prior to rains and frog breeding), this technique is only a potential supplemental action to maximize physiological stress on cattail and tule roots and rhizomes during periods of deep submergence. In contrast with dredging to maintain open water in shallows that would otherwise support marsh, it would be a one-time event coordinated with initial raising of winter-spring lagoon water levels.

The functional basis for aquatic mowing to control tules and cattails at depth near their limits of tolerance (3-4 ft) is as follows. Submerged cattail and tule roots and below-mudline buds "breathe" through air passages in both live and dead standing shoots above the water surface. When these above-waterline shoots are cut or submerged, roots and rhizomes deplete limited reserves of oxygen, and are exposed to natural sediment toxins like sulfides, which are otherwise neutralized by low levels of oxygen diffusing from roots. The only way the mown plants can reconnect roots to oxygen pathways to roots is by elongating new shoots above the waterline. Submergence by 3-4 feet of water or more severely limits the ability of roots to resume normal metabolism, compared with intact plants with standing shoots above the waterline. Aquatic mowing of marsh arguably has significantly less wetland impact (equipment mobilization, sediment disturbance, biogeochemical and water quality effects) than dredging marsh sediment.

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There is another major difference between the water level management alternative and proposed dredging with regard to the spatial pattern of open water and marsh, and marsh drainage and pumping, and it relates to the contrasting basic purposes of flood control versus habitat enhancement. Moderately raised lagoon water levels (1-2 ft above existing baseline near 7 ft NAVD) would not produce a large, deep linear ditch aimed at the pump intake forebay, with maximum efficiency for drainage and pumping (*i.e.*, floodwater conveyance), as dredging a canal would. The remnants of the old ditch are apparently infilled with vegetation and the young peat (organic substrate) it produced, so it is uncertain whether raising water levels would re-open shallow water over the old ditch alignment significantly, if at all.

In contrast, raising lagoon water levels by 1-2 ft would very likely open more water habitat next to the lowest elevation marsh at the existing open water/marsh edge, along a depth gradient controlled by bathymetry of the lagoon This difference discriminates between the basic project purpose as flood control for recreation land use, and the (incidental or fictitious) purpose of increasing open water/marsh habitat edge. But if the basic purpose is really to increase open water/marsh habitat and reverse progressive spread of marsh into open water (caused by long-term marsh pumping and drainage to stable shallow summer-like water levels most of the year), then a properly designed water management alternative would be more effective and environmentally superior (higher short-term and long-term benefit/lower impact).

I agree with the Staff Report conclusion that dredging is at most a very short-term, *temporary* solution to the problem of progressive marsh spread into open water:

> By analogy, clearing of the vegetation and sediment is a *temporary* action to maintain the existing capacity of the pumps." [Staff Report p. 23].
>
> ...shallow water, which in one sense, benefits egg laying by the CRLF because the frogs prefer warmer waters, also promotes the growth of cattails and tules, causing the encroachment of emergent vegetation within LS and HSP. This spread of emergent vegetation not only compromises the pumping operations, but also leads to loss of open water habitat needed by CRLF.13 SFRPD has explained that the c*urrent project activities proposed in this CDP application consist of a short-term solution to an ongoing problem.* SFRPD is currently considering long-term solutions... Staff report p. 22
>
> In addition, the project represents a *temporary solution to an existing problem* that may be already aggravated by the ongoing maintenance activities at the Golf Course. Specifically, ongoing pumping activities at the Golf Course, which will continue as a result of the infrastructure improvements and replacement pumps, may continue to maintain low water levels that all parties agree aggravate the spread of emergent vegetation which compromises open water breeding habitat for CRLF. So, while this

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project proposes a temporary feasible management *solution, the ongoing pumping may continue to exacerbate the problem in the long-term.* Staff report p. 25:

These statements appear to be inconsistent with Staff Report findings on page 2, which appear to be unexplained and without citation:

> Additionally, clearing sediments and vegetation from Horse Stable Pond *will maintain the long-term functional capacity* of the wetland complex and *may eventually increase such capacity* consistent with Coastal Act Section 30233(c).

As long as the lagoon is maintained artificially shallow most of the year, the marsh will re-occupy all shallow water within its limits of submergence tolerance. Maintenance of perpetually low summer-like water levels most of the year also implies *permanent, perpetual dredging cycles*, probably on the order of 5 years, to maintain open ditches. It also inevitably implies *permanent* (cyclic) *impacts* of marsh maintenance dredging. Is this foreseeable ongoing, cumulative dredging impact to wetlands assessed in the staff report? Or is the project treated as a one-time event? I know of only one other coastal wetland in California occupied by federally listed endangered species where regulatory agencies approve of routine dredging of marsh as maintenance activity: "grandfathered" (century-old) vast areas of managed waterfowl marshes of Suisun Marsh, where routine non-tidal ditch maintenance has relatively low-level impacts to one widespread listed wildlife species, for which applicants have substantial compensatory mitigation obligations.

The Staff Report also infers that raising water levels would increase water level fluctuations that adversely impact breeding of California red-legged frogs. This matter requires careful analysis, and I believe it is basically incorrect. The water level fluctuations actually should decrease, not increase, as the target water level is raised, because with less deviation between target threshold levels triggering pumping and flood levels, pumps (should activate less often during flood periods. Thus, rapid, abrupt drawdown of lagoon levels during the frog breeding season should decrease in both frequency and magnitude.

I can find no documented evidence that Sharp Park golf recreation is now significantly impaired by shallow flooding of wetland and golf turf margins around elevation 9 ft NAVD in 2015. I observed shallow flooding of mown turf areas around holes 14-15 (approximately 9 ft elevation, dead reckoning by topographic maps; I did not conduct elevation surveys of water levels). Even in this drought year, on April 2 and March 7, Sharp Park golf course was open and busy (many players even near sunset). See photos below, taken from Sharp Park Boulevard. Both golf players and ducks were present side-by-side along the flooded edges of the northeast corner of the golf course. Is it the applicant's burden to demonstrate that golf is actually "infeasible" at approximately 9 ft water levels, rather than merely not the applicant's preferred alternative?

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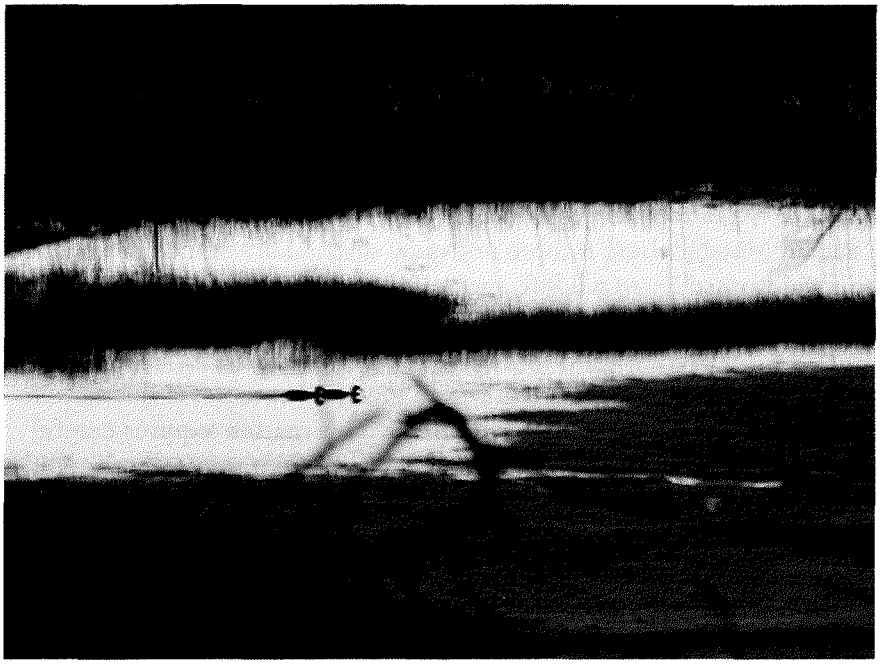
April 2, 2015

March 7, 2015



March 7, 2015

2. Historical Ecology of Sharp Park

The Staff Report Addendum on page 5 states, "...in regards to the historic ecology of Sharp Park staff does not see a significant area of disagreement between what has been presented in the staff report and what was presented by the project opponents". The Staff Report is inconsistent in its statements regarding historical ecology of Laguna Salada, possibly due to citation of different sources and inadvertent misinterpretation. The problematic statement of historical ecology occurs on page 34 of the Staff Report, where it reiterates local lore:

> Sharp Park is unusual in that natural conditions are not necessarily the best conditions for the sensitive species in question here. Under completely natural conditions, without the berm and with no pumping, CRLF would probably not exist at the site as the water would be too brackish. The CRLF began surviving at the site after the water became less salty....[Staff Report p. 34]

This statement above is not consistent with Staff Report statements citing Dr. John Dixon's memo (Exhibit 7), which is substantially correct and agrees with statement of "opponents" that the lagoon was normally non-tidal, and only intermittently tidally influenced through an unstable and ephemeral tidal inlet:

> The watershed is too small for runoff to maintain on open inlet or regularly breach the barrier beach, but the lagoon was probably **intermittently and briefly connected to the ocean through an outlet channel** and it periodically received sea water that overtopped the sand berm adjacent to the beach. **These hydrological characteristics probably resulted in a salinity gradient from brackish near the beach to fresh at the landward edge.** (Staff Report Exhibit 7, April 2 Dixon memo; bold added for emphasis)

> In their letter of April 13, 2015 the project opponents claim that contrary to the staff report findings, "Sharp Park was historically a backbarrier lagoon/beach ecosystem, and was not influenced by *daily* tides."

To clarify, there is a huge ecological difference between "influenced by daily tides" and "intermittently and briefly connected to the ocean through an outlet channel". Daily tides occur through permanently open tidal inlets, like those of swell-sheltered south-facing tidal lagoons such as Bolinas Lagoon, Drakes Estero, or Bodega Harbor, or jetty-maintained inlets like Moss Landing. The relevant significant point here is that overwhelming physical process and historical ecological evidence supports the hypothesis that Laguna Salada supported fresh-brackish wetland gradient with tule, cattail, and bulrush marsh, long before the berm or golf course. This is not consistent with the Staff Report's causal attribution of fresh-brackish wetlands to the berm on page 7: "*As a result of the berm,* the wetlands found within the Golf Course transitioned from historically tidally influenced saltwater wetlands that were brackish near the beach, to modernly freshwater wetlands (see Dr. John Dixon's Memo)."

Natural fresh-brackish lagoon wetland gradients are typical of coarse-grained, west-facing barrier beaches and the lagoons they enclose in the North Central Coast region. These fresh-brackish natural lagoon wetland ecosystems support California red-legged frogs, western pond turtles, and garter snake subspecies in the absence of artificial dikes, berms, or golf courses. Many examples with supporting analysis are provided in the appendices of the peer-reviewed ESA-PWA (2011) report on Laguna Salada, which is substantially consistent with Dr. Dixon's memo. https://www.savethefrogs.com/actions/sharp-park/images/Sharp-Park-Report.pdf

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> The historical Laguna Salada, prior to Sharp Park construction, supported fringing marshes with cattails and bulrushes that were intolerant of high salinity. Laguna Salada was …a brackish to fresh-brackish wetland like other seasonal or nontidal coastal lagoons in the region."… We conclude that Laguna Salada in its pre-disturbance state was a backbeach lagoon that was predominantly non-tidal and primarily formed by rainfall runoff pooling behind the beach ridge. The coarse-grained beach was built and maintained by strong wave action and adequate sediment supply. Our analysis indicates that the lagoon was not big enough to maintain a tidal opening against the large waves that would close it off. However, waves were (and are) large enough to overwash the beach and bring in salt water. Therefore, we conclude that salinity was controlled by fresh runoff but was variable fresh-brackish (low salinity) due to wave overwash and brief tidal incursions following breaching
>
> We conclude that fresh-brackish CRLF and SFGS wetland habitat existed at Laguna Salada before the golf course was constructed, when the site was modified for agriculture. We also conclude that pre-agricultural conditions could have, and likely did, include CRLF and SFGS habitat. (ESA-PWA 2011).

Again, the importance of this point is that the origin and maintenance of fresh-brackish wetland gradients and listed species did not depend on golf or artificial berms. Fresh-brackish lagoon wetlands naturally occur throughout the region, and there is unambiguous evidence of cattail-tule fresh-brackish marsh at the landward end of Laguna Salada prior to the golf course.

3. Scenic coastal views. (Staff Report p. 2, 3, 18)

The analysis of scenic views at Sharp Park is related to topography and vegetation of the beach, berm ("seawall"), and golf course, as well as public access constraints like the new fence along the berm. I do not claim expertise on scenic views, but I would like to clarify some basic confusion in the Staff Report related to views on p. 18:

> Sharp Park is a public park that provides recreational opportunities for all people. In addition to the golf course, it offers breathtaking views to hikers, runners, cyclists, and due to the easy access by car and on foot, to visitors who may only have a short time available to see the ocean. Sharp Park qualifies as a sensitive coastal resource area due to its significant recreational value and because it is a highly scenic area.

The scenic coastal views of the ocean, beach, and lower Mori Point cliffs from the golf course itself are obscured by the berm/seawall, which has a crest elevation about 6 ft or more above the beach crest, which ranges around 17-18 ft elevation or higher. Most of the golf course lies in the depression of partly filled Laguna Salada at elevations well below the berm crest. Even from Sharp Park Boulevard, above the golf course, the beach is not visible

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across the berm. The spectacular views described are possible only from the berm/seawall and beach, which is separated from the golf course by a new/recent fence. In addition, relict Monterey cypress groves (dead standing snags and live trees) further obscure coastal vistas from the golf course itself. Therefore, the scenic view qualities described and extolled in the Staff Report are features of the berm, not the golf course in its current form. The original Alister MacKenzie golf course design apparently allow for open coastal views, but that came at the cost of excessive vulnerability to coastal storms which eventually destroyed the western part of the golf course, in an obvious storm overwash hazard zone.

4. Monitoring methodology and sampling strategy. In order to generate interpretable, analyzable data, conditions for monitoring must include requirements for the spatial sampling plan (distribution of sampling locations on landward and seaward portions of the lagoon, and in transects spanning the lagoon/marsh gradients). In addition, vegetation data must include position data (GIS or ground survey) data on the lower edge of marsh/water edge vegetation, in order to interpret horizontal marsh retreat/advance responses to water level changes over time. Aggregate "cover" area estimates will not be sufficient for this purpose. In addition, disturbance-free (exclosure) transects including the upland/marsh edge will be necessary to determine the accurate position of the wetland boundary and buffer zones. This will also necessitate accurate identification of grasses, including *Agrostis stolonifera* (creeping bentgrass, a widespread wetland grass also occurring in some golf turf; distinct from *Poa* (bluegrass) species.

5. Chronology of earthen berm incremental construction. The Staff Report (p. 12) states that the golf course was "separated from the beach by a berm built in 1941 to keep the ocean from flooding the course", and then jumps to the description of the recent armored condition: "This earthen berm, with a rock revetment on its western side..". This chronology is inconsistent with historical aerial and ground photography of Salada Beach and Laguna Salada. I would recommend that staff rigorously examine the available historical aerial and ground photography available to develop an accurate chronology of the berm. Robert Battalio (ESA) did this for the ESA-PWA report on Laguna Salada (2011), and concluded that:

> While dune building and stabilization in the 1920s to 1940s altered the natural beach berm morphology, a significant coastal structure did not exist until decades later. A review of historical photographs and documents indicates that the existing levee was not constructed until the 1980s. The majority of the coastal levee/seawall was constructed in 1989-1990. .... A review of available photos prior to 1983 shows an earth embankment at the north and south ends of the shore, with no embankment in the middle third. The embankments are not as large as the existing levee and proposed seawall structures, and do not extend the full length of the shore. (ESA-PWA 2011 p. 15; and Appendices)

6. Conclusions. Without prejudice to permit issuance or denial, I recommend that staff rigorously re-examine the premises and conclusions of the alternatives analysis, particularly

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with regard to accurate, objective feasibility thresholds and hydrologic-ecological thresholds. Scientifically sound analysis of wetland management alternatives is critically important in context of wetland dredging policies and conflict resolution procedures, and evaluation of reasonable public interest trade-offs between recreation policy priorities and coastal wetland or ESHA resource conservation priorities.

7. Summary statement of qualifications (coastal wetland ecology expertise).

I have over 35 years' experience as a professional coastal ecologist, including senior wetland regulatory analysis for the U.S. Army Corps of Engineers San Francisco District, and endangered species recovery planning focused on coastal wetland ecosystems of California, with specialization in ecology of coastal lagoons, tidal marshes, beaches, and dunes. I have closely observed coastal lagoons from Marin to Santa Cruz for over two decades, and my professional wetland consulting work includes restoration, enhancement guidance for multiple coastal lagoons managed and owned by California State Parks and National Park Service. I co-authored a detailed and comprehensive assessment of modern and historical ecology of Laguna Salada with ESA-PWA (now ESA) in 2010.

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WILD Equity INSTITUTE

Building a healthy and sustainable global community for people and the plants and animals that accompany us on Earth

The Wild Equity Institute is working to build a new public park at Sharp Park in Pacifica, CA. With our partners at the NPCA, the Neighborhood Parks Council, the National Japanese American Historical Society, and many other organizations, we have proposed to close the course and partner with the National Park Service to restore the land and interpret its hidden history, including the former WWII internment camp and prehistoric artifacts that have been found on the site.

Perhaps in response to this idea and litigation, **for the first time San Francisco is proposing to landmark Sharp Park Golf Course. This proposal is not well informed**. Below you will find background information about this proposal.

Although Alister MacKenzie, the original architect of Sharp Park Golf Course, has made some important golf courses, there is significant disagreement about (a) the quality of the original architectural design at Sharp Park and whether it is a reflection of Mackenzie's signature design, and (b) its current integrity. **Every history written about this course before the restoration proposal we are advancing was announced concluded that the original MacKenzie design no longer exists at Sharp Park today.**

Some contemporary golf advocates have suggested that these previous assessments were based on misinformation or bad data. They have gone as far as suggesting that several of the links at Sharp Park remain consistent with Sharp Park's original design. As a preliminary matter, **golf courses are not simply a collection of links: they are a course, and to suggest that because a few golf links remain in the places Alister MacKenzie placed them does not answer the question about the historic integrity of the course as a whole.**

But more importantly, these assessments are directly contradicted by assessments made away from the heat of this dispute, and not conducted by individuals with a stake in the outcome. **Indeed, the only individuals who have asserted that Sharp Park is historic are associated with the San Francisco Public Golf Alliance—a golf activist organization that is not qualified to provide these assessments, and has an inherent conflict in doing so regardless.** Therefore, the previous assessments are more likely to be unbiased and accurate: even if the historians who wrote them would prefer the original course be restored, instead of than the natural areas upon which the course was built.

Some of MacKenzie's courses should be considered for recognition. But Sharp Park is simply not the place to start. There is not a single Alister MacKenzie golf course presently listed on the California or federal registers of historic places, and most everyone would agree that Sharp Park is not one of the greatest examples of his work. Indeed, **the litany of problems the golf course faces—from chronic annual flooding, to the killing of endangered species, to the low grades given the course by its own golfers, to the chronic financial instability of the course, to the inevitable loss of the site to sea level rise as our climate changes—all indicate that this particular course does not exemplify the work of a master implementing his art.**

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Moreover, the San Francisco Public Golf Alliance has distributed false information to the Planning Department and to the Historic Preservation Commission arguing that Sharp Park Golf Course itself has been designated an historic landmark by the City of Pacifica. **This is not true: indeed, to the extent any historic preservation has been provided to Sharp Park, it has been equally provided to the trees, lagoon, and marsh on the property,** as will be shown below. Indeed, a proposal to try and landmark the golf course was tabled indefinitely by Pacifica's Planning Commission in 2009.

The Pacifica General Plan (as updated August 2005) Historic Preservation Element. This section includes a "list and map of all of the sites and structures felt to be of historic significance in Pacifica."

With regards to Sharp Park, the Pacifica Historic Sites list includes:

Number 18. Laguna Salada & Marsh
Number 19. Sharp Park Golf Course & Clubhouse
Number 20. Trees in Sharp Park

However, this section also states that "the element would be implemented by an Historic Ordinance which would establish a Pacifica Historic Sites Advisory Committee to review proposed changes to sites and structures designated on the Historic Sites Map and advise the Planning Commission and City Council of the appropriateness of the proposal." **No such Historic Ordinance or Advisory Committee was ever created: instead Pacifica implemented this through its zoning code.**

Title 9 of Pacifica's Zoning Code, Chapter 7 covers Historic Preservation. Section 9-7.208 of the Code lists Pacifica's designated Historic Sites:

Sec. 9-7.208. - Final designations.
The following structures, having been approved by the Planning Commission and Council for designation as historic landmarks pursuant to the procedures of this article, are hereby given final landmark designation:

(a)Sanchez Adobe;
(b)Sharp Park Golf Course Clubhouse;
(c)Little Brown Church;
(d)San Pedro Schoolhouse;
(e)185 Carmel Avenue;
(f)Vallemar Station, 2125 Cabrillo Highway;
(g)Anderson's Store, 220 Paloma Avenue;
(h)165 Winona Avenue; and
(i)Dollaradio Station.

(§ 1, Ord. 482-C.S., eff. May 27, 1987, as amended by § 1, Ord. 533-C.S., eff. September 27, 1989, § 1, Ord. 534-C.S., eff. September 27, 1989, and § 2, Ord. 569-C.S., eff. July 10, 1991, § II, Ord. No. 770-C.S., eff. May 26, 2010)

As you can see, only the golf course clubhouse has been designated historic by Pacifica. **Laguna Salada itself, along with the golf course, are 'potential' historic resources according to the general plan, but because these potential resources were never finalized into actual landmarks, they are not so protected.**

Only Sharp Park Golf Course's clubhouse is listed as an historic landmark in Pacifica, an uncontroversial finding that is not impacted in any way by the restoration proposals we have all pursued. However, **to rely on Pacifica's general plan as reason to landmark the golf course takes one only so far, because the marsh, lagoon and trees—all directly threatened by the course, are provided the same level of so-called protection as the course itself.**

San Francisco's own Historic Preservation Commission, the City's agency responsible for identifying and designating landmarks, disagreed with this assessment. **On September 21, 2011, the Commission ordered staff to prepare comments stating that they do not concur in the Recreation and Parks Department's position that Sharp Park retains historic integrity.**

There is good reason for this determination:

- The Recreation and Parks Department's Historic Resources Evaluation provides **insufficient information and evidence to support its conclusion that Sharp Park retains historic integrity**.
- The evaluation also **lacks a proper analysis of the historic landscape**, and thus there isn't an appropriate baseline to judge integrity.
- The Evaluation also **fails to consider a range of mitigation measures**, and thus precludes restoration of endangered species habitat. Historic preservation and natural resources protection are not exclusive – Crissy Field and Muir Woods restoration are examples of natural resource restoration projects where historic resources existed.
- The National Park Service has asked to play a role in any historic resource evaluation of the golf course – per their 2009 statement – because the course is within their historic boundary and they are undertaking a multi-million dollar wildlife habitat restoration project adjacent to Sharp Park, yet the City has not engaged the Park Service. The **Park Service is considered the most respected expert in historic resource preservation**.

Attached to this memo are previous statements by the National Park Service and the City of San Francisco opposing landmarking the golf course in Pacifica; written histories about how the course no longer retains integrity; and a link-by-link assessment of what has been lost at the golf course.

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Sharp Park today bears no resemblance to Alister MacKenzie's original design. **Every link has been changed at Sharp Park—in many cases radically, and many holes have been lost completely.** It is misleading to claim that any historical integrity exists at the course.

- The water features on five MacKenzie holes east of Laguna Salada, original holes 1, 9, 15, 16, & 17, have been culverted, eliminating crucial water hazards essential to his design.

- Five holes west of Laguna Salada, including original holes 3, 4, 6, 7, & 8 were destroyed completely by massive coastal storm surges and the subsequent construction of the berm.

- Two others, original holes 2 & 5, were severely damaged and modified to eliminate additional water features and other elements of their design. Now the site of hole 12, the original hole 2 was shortened by 60 yards and a stroke while the strategic features—including its proximity to a much larger Horse Stable Pond than exists currently—are almost completely irrelevant to the hole's play today. Hole number 5, which was considered by Jack Fleming to be "one of the most interesting holes on the course, similar to Dr. MacKenzie's 'ideal golf hole,'" is now the current site of hole 17, but other than occupying the same space the hole bears absolutely no resemblance to the original hole 5: a tee shot over Laguna Salada has been removed, and dual fairways have been combined into one, eliminating strategy alternatives integral to MacKenzie's design.

- Original holes 10 and 11, now the location of holes 14 and 15, have likewise been modified with changed greens and fairways that bear no resemblance to MacKenzie's layout. Indeed, Daniel Wexler argued that the original hole 10 was perhaps the course's best link, but its essential feature—a double fairway—no longer exists.

- Original hole 12, now the location of hole 18, has had sand traps removed from the design. In addition, original hole 13 (now 3), and original holes 14 and 15 (now the location of holes 8 and 2) described by Wexler as "not among the layout's finest" to begin with, have likewise had hazards reconfigured, as has the final original hole, 18 (now the location of hole 10).

- In addition, the theory of the course—the creation of a links-type, seaside course—was entirely upended when the berm was built separating the course from the ocean.

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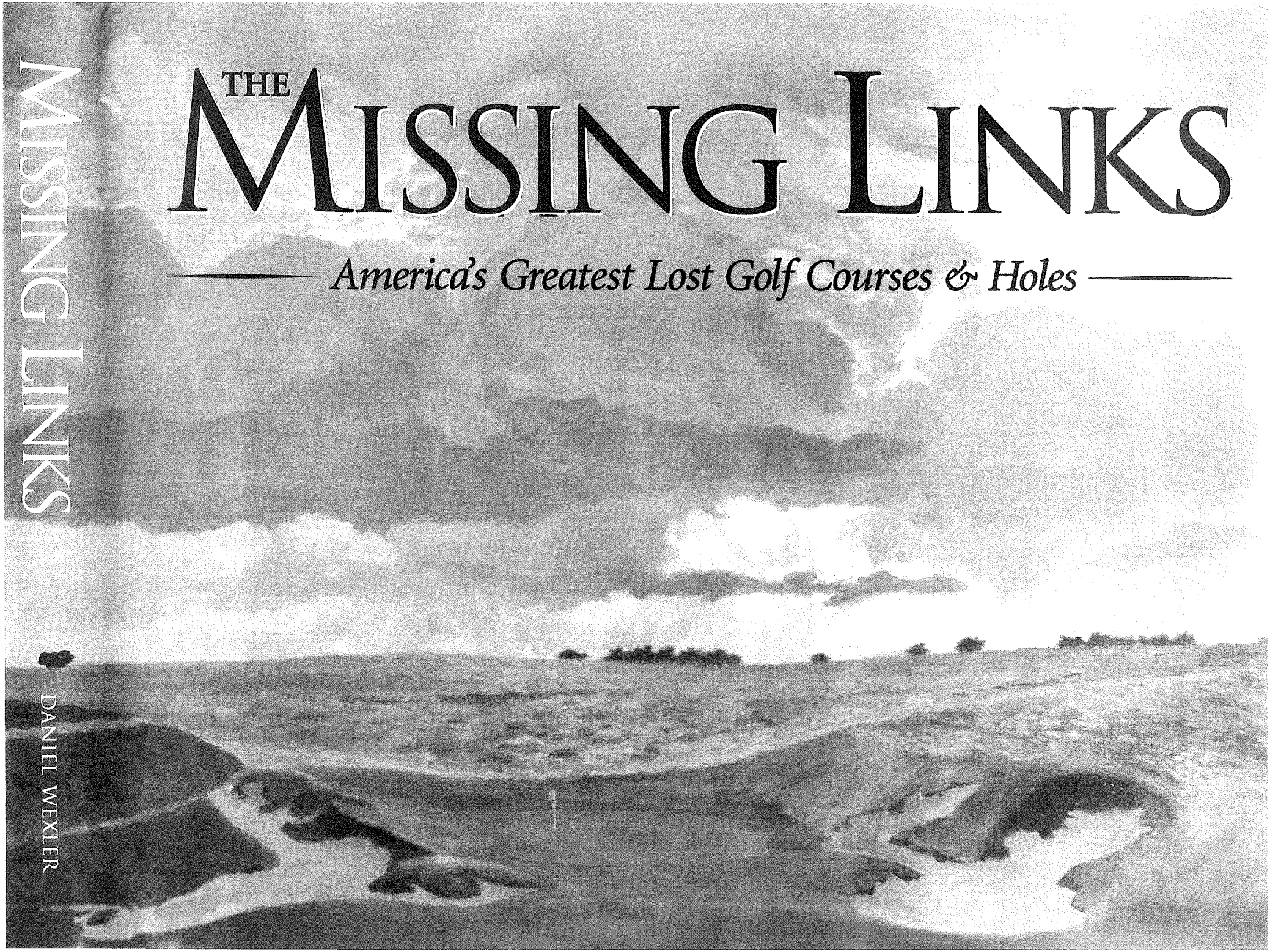
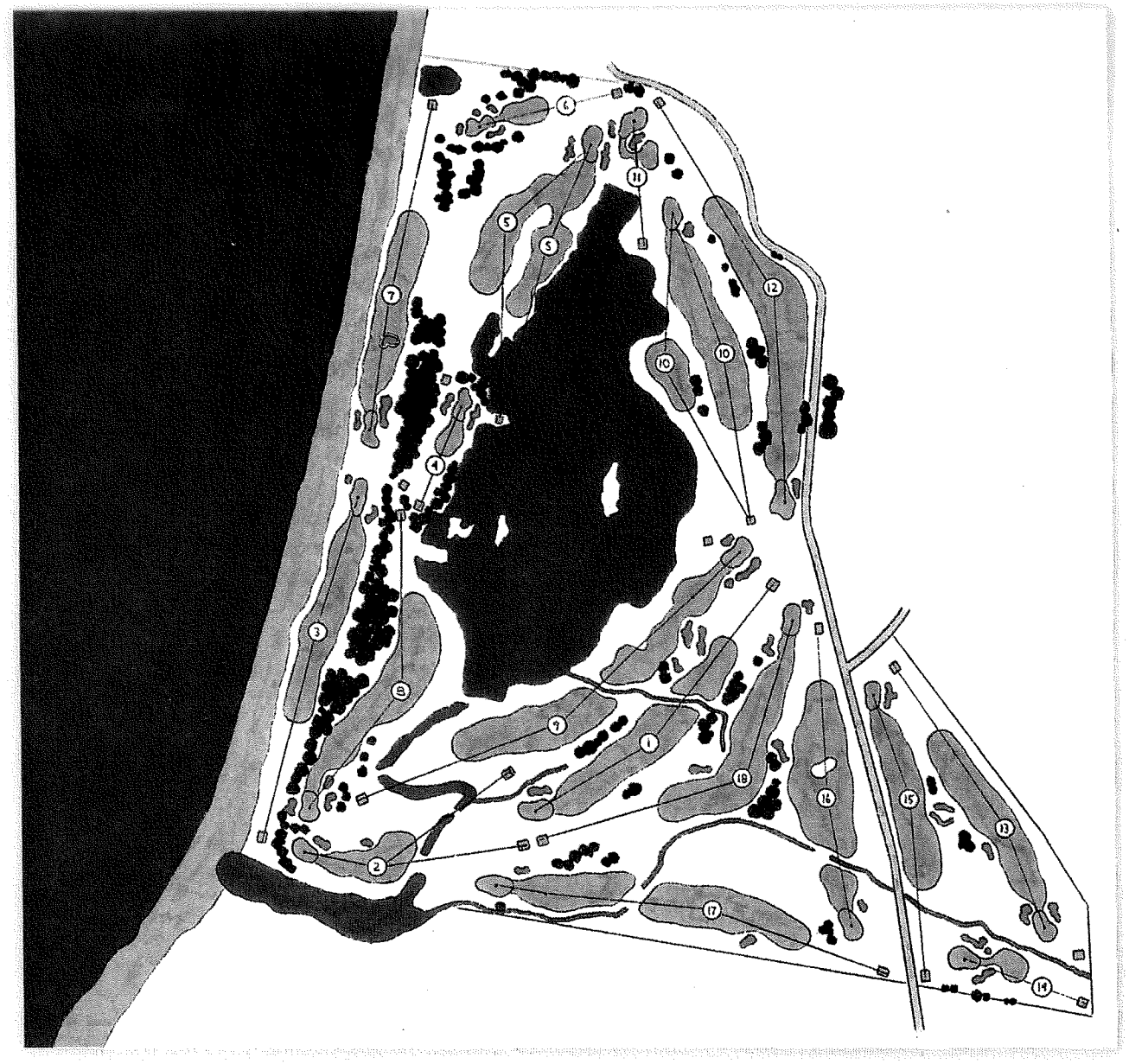

THE MISSING LINKS
America's Greatest Lost Golf Courses & Holes
MISSING LINKS
DANIEL WEXLER



SHARP PARK																				
400	274	423	120	338	168	383	398	538	3042	392	142	483	345	143	330	363	471	443	3112	6154
4	4	4	3	4	3	4	4	5	35	4	3	5	4	3	4	4	5	4	36	71

1943 aerial survey reveals a number of MacKenzie's original holes still intact, plus four newer ones built to the east. (National Archives)

SHARP PARK GOLF COURSE

PACIFICA, CA

Opened in 1931 / 6,154 yards Par-71

As today, some 65 years after his death, Dr. Alister MacKenzie remains perhaps the most celebrated golf architect in history, it is truly remarkable that two public courses he laid out in major American metropolises could have been so short-lived and poorly documented. Yet Bayside, as we have seen, labored in (and vanished into) almost complete obscurity—and it cannot even begin to compare with the briefly-lived legacy of San Francisco's Sharp Park.

MacKenzie's Sharp Park layout is surely one of golf architecture's most enduring mysteries. Owing to the fact that it was built in 1931, then washed into oblivion by a coastal storm shortly thereafter, its original design was seen firsthand by very few. Nor was this initial version in any way adequately recorded, with few photographs of any kind known to remain in existence. Further, a visit to today's 6,299-yard facility offers little; this vastly-altered layout serving mostly to make one wonder if a vintage MacKenzie design ever *could* have existed upon this site.

But the Doctor's original, located very much upon this same land, was all that its tantalizing prospects have suggested, a marvelous golf course featuring seaside holes, two double fairways, a large lake, and a cypress-dotted setting fairly reminiscent of Monterey. It was, in short, a municipal masterpiece.

Located just 10 miles south of downtown San Francisco, the site given to MacKenzie was uncommonly fine for a public facility, including a nearly 1,000-yard oceanfront stretch along Salada Beach. For a county whose public course facilities at Harding and Lincoln Parks were among the busiest in the nation, the development of Sharp Park was a godsend, but this wonderful property was not without its drawbacks.

For one thing, a fair amount of the land required shoring up with massive quantities of dredged sand in an expensive, Lido-like operation. Second, the site was partially divided by a small county road, a circumstance dictating that three of MacKenzie's back-nine holes be separated from their 15 brethen. Years later this road would be rerouted, though by that time the storm-driven reconfiguration of the golf course would still leave four newer holes separated, about the only commonality between MacKenzie's work and the course in play today.

The 1931 layout began with a dogleg-right par-4 of 400 yards, a strong but not especially memorable opener. But things changed quickly at the second, a 274-yard par-4 with alternate tees situated on either side of the first green. In what today might be referred to as "risk/reward" style, this nearly-driveable hole featured a large bunker front-right of the putting surface and a lake to the left of the fairway, creating the wonderful question of just how near the water one dared to venture in pursuit of an easier angle for his second.

The third was a long two-shotter of 423 yards, playing directly north along the beachfront. Again the risk/reward question was laid before us: play safely down the middle and deal with a front-right greenside bunker or aggressively skirt the beach in pursuit of an open second? Seaside winds generally affected play at Sharp Park greatly, bringing those most unlinkish of obstacles—trees—into play along the right side as well.

Following the short fourth, a precise pitch played along the lake's westward shoreline, one reached the first of the dual-fairway holes, the 338-yard fifth. Here the player's options were numerous with a "safe" left-side route leaving the most difficult second-shot, a dangerous lakefront fairway opening up a more direct line, or the all-out blast over everything leaving a mere pitch from a wide-open angle. As at the second hole, a second tee positioned left of the previous green served to create additional angles and variety.

The 385-yard seventh was the course's second and last seaside hole, playing directly south to a long, narrow green flanked on either side by sand. The slight angling of the putting surface again tempted one to drive close to the beach (particularly if the pin was cut back-left), but the lesser presence of trees at least made this tee shot a bit more forgiving.

The 398-yard eighth, though built with only one fairway, offered two very distinct lines of play. A drive aimed safely left was simple enough but set up a nearly all-carry approach across two front-left greenside bunkers. For the man capable of controlling a long fade, however, there was the option of skirting the treeline, a shot which, if brought off successfully, again yielded a more favorable approach.

Though one hesitates to name a best hole among so many good ones, the 392-yard 10th did

a fine job of nominating itself. Here was the double fairway concept played out to the fullest, the right side providing ample safety but a bunker-obscured second, the left requiring a gutsy tee shot to a water-guarded fairway but yielding a straight-on approach. Yet again, dual tee boxes varied the challenge from day to day, making the 10th a truly great hole—but an intimidating prospect for anyone hoping to slip past the starter and begin play on the back nine.

Following the 142-yard 11th came the long 12th, a 493-yarder distinctly reachable in two, provided one avoided several prominent trees and the out-of-bounds which ran down the entire left side.

Perhaps not surprisingly, the three holes exiled across the county road were not among the layout's finest, the 345-yard 13th being the best of the bunch with out-of-bounds also threatening its more-favored left side.

With the routing having returned to the clubhouse for a third time, one set out again at the 363-yard 16th, a par-4 following much the same path as today's first hole. Here a large mound punctuated the fairway some 175 yards off the tee, offering several different angles of play. The more difficult drive was the one aimed down the right side, close to a clump of trees. Naturally this choice also provided the better approach angle to a deep, narrow putting surface.

MacKenzie closed out Sharp Park with a pair of long finishers beginning with the 471-yard 17th. Though not a particularly difficult hole, this short par-5 often faced a strong sea breeze and featured out-of-bounds left, two bunkers, a meandering brook and a green laid precariously close to a rough, marshy depression. The 18th, by contrast, was a bit of a monster, its 443 yards requiring more brute strength than finesse, though the ability to draw one's tee shot would obviously have come in handy.

It was indeed unfortunate for Sharp Park that so many of its best holes fell along the property's ocean side, for it was this flank which took the brunt of any incoming storms. Following the early 1930s deluge that washed several of these gems out to sea, a massive berm was constructed (largely upon land once occupied by holes three and seven) to prevent history from repeating itself. The subsequent rerouting of the county road and reconfiguring of the lakeside holes has further muddled things so that today only a handful of holes run consistent with MacKenzie's originals, and no appreciable trace of his strategy remains in play.

How Sharp Park Would Measure Up Today

Oceanfront holes, double fairways, MacKenzie bunkering, marvelous scenery...

Any way you look at it, even at only 6,154 yards, Sharp Park would have to stand well out in front as America's finest municipal golf course.

Restoration anyone?

SHARP PARK

Being that the City had come by the lots at Sharp Park so cheaply(free in fact)they decided to bring in one of the world's foremost golf architects, Dr. Alister Mackenzie. The fact that Mackenzie and his assistant at that time, Jack Fleming, were able to design a golf course along the San Mateo County coast line was quite an accomplishment in itself. They managed to accomplish this difficult feat by dredging for fourteen months in order to build up the fairways.

On May 15, 1930 Robert Hunter, Jr. was appointed the superintendent of construction for Sharp Golf Course at a fee of $750 for ten month's work. Four and a half months later on October 2, 1930 Willis Polk and Company was authorized to prepare plans and specfications for the starter's house at the golf course. The original cost of playing golf was $2.00 per month and a card good for all three courses became available in May 1932 for $5.00.

The courses's opening in 1932 was twice delayed due to wet conditions. The golf course officially opened April 1, 1932. Perhaps the fact that even the opening of the course had to be delayed twice due to winter rains should have warned of the drainage problems this site would always face. Normally a golf course will welcome the rest and revitalization the winter rains bring. In Sharp Park's case the winter rains brought about the annual flooding of Laguna Salada out on to playable portions of the golf course. This problem still persists 47 years later even though a 4,000 gallon water pump has been installed. Two factors contribute to the poor drainage problem at the Sharp Park site. First and foremost

is the fact that the course is built at sea level and thus was susceptable to changing tides. The second factor was the annual flooding of Laguna Salada itself.

The golf course that opened on April 1, 1932 was becoming increasingly popular until it was severely damaged by high tides in a storm during the winter of 1938. The holes constructed on or near the beach were unindated by the unchecked tides of the storm. This resulted in severe damage to the beach holes - Numbers 2 through 8. The course, generally considered one of the best tests of golf in Northern California would never be the same. The beach holes had to be abandoned and reconstruction was forced across the Coast Highway up into what is now referred to as "The Canyon Holes". The effect was much the same as taking a house with a beach view and turning it 180 degrees to face a mountain slope. This was the most drastic architectural change the Sharp Park layout would ever face. Even the State Highway construction in the early 1960's that wiped out one par three hole would not have as damaging effect as nature.

Sharp Park remains very busy to this day drawing players both from the City and from down the peninsula. During the winter, however, as the water table rises, the course becomes less playable and suffers a significant drop in play - more so than other municipal courses during the winter. One winter in the early 1970's flooding was so thorough that the unchecked water nearly reached the clubhouse.

City and County of San Francisco
Recreation and Park Department

McLaren Lodge in Golden Gate Park
501 Stanyan Street, San Francisco, CA 94117
TEL: 415.831.2700 FAX: 415.831.2096 WEB: www.parks.sfgov.org

September 1, 2009

Honorable Julie Lancelle
Mayor, City of Pacifica
City of Pacifica City Hall
170 Santa Maria Avenue
Pacifica, CA 94044

Michael Crabtree, Planning Director
City of Pacifica
Planning Department
1800 Francisco Blvd.
Pacifica, CA 94044

Re: Proposed Designation of Sharp Park Golf Course as a Pacifica City Landmark

Dear Mayor Lancelle and Director Crabtree,

I am writing in regard to the City of Pacifica's application to designate the Sharp Park Golf Course a Historic Landmark under Pacifica Municipal Code, Chapter 7. We think this action is both inappropriate and unnecessary. Under California law, the City of Pacifica cannot regulate land use at Sharp Park which is owned by the City and County of San Francisco. (*See*, Cal. Govt. Code §§ 53090, et seq., *Akins v. County of Sonoma*, 67 Cal. 2d 185 (1967).) Therefore, any designation of the Sharp Park Golf Course as a historic landmark by the City of Pacifica will have no legal effect and, frankly is not helpful in furthering a legitimate public policy debate here in San Francisco.

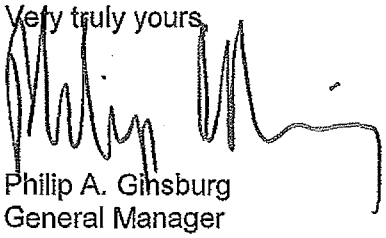
We certainly recognize that Sharp Park Golf Course is used and enjoyed not just by many San Franciscans, but also by the residents of Pacifica, and that your City is concerned about any potential changes to it, and particularly to the golf course. As you may know Sharp Park is approximately 400 acres -- 237 of those acres are included in the San Francisco Recreation and Park Department's Significant Natural Resource Areas Management Plan (SNRAMP). This Plan is currently undergoing environmental review under the California Environmental Quality Act. We appreciate the historic and cultural value of the golf course, and an evaluation of the effects of the SNRAMP on the golf course as a potential historical resource will be included in the SNRAMP EIR.

As you also likely know, the area around the Sharp Park Golf Course contains habitat that support two special status species: San Francisco garter snake (*Thamnophis sirtalis tetrataenia*), listed as endangered under the federal Endangered Species Act, and classified as a fully protected species under California Fish and Game Code § 5050; and the California red-legged frog (*Rana draytonii*), listed as threatened under the federal Endangered Species Act and a state species of special concern. Under federal and state law, the City and County of San Francisco must ensure that the golf course operation does not endanger or harm either of these species. Recently, the San Francisco Board of Supervisors enacted legislation directing the Recreation and Park Department to develop a plan for

restoring the habitat for the garter snake and red-legged frog in conformance with federal and state law. Currently, we are preparing option plans, including schedules and costs for presentation to the public and to the Board which we hope to have preliminarily completed in October 2009.

We take our stewardship responsibilities at Sharp Park very seriously. In a very difficult financial climate, we must manage the recreational, cultural and biological uses of the park in a manner that best balances legitimate recreational needs with our fiduciary and legal responsibility to protect the habitat. We will continue to include the City of Pacifica in our discussions as we evaluate plans Sharp Park's future.

Very truly yours,



Philip A. Ginsburg
General Manager

cc: Mayor Gavin Newsom
Members of the Board of Supervisors
City Attorney Dennis Herrera
Members of the Recreation and Park Commission

United States Department of the Interior

NATIONAL PARK SERVICE
Golden Gate National Recreation Area
Fort Mason, San Francisco, California 94123

IN REPLY REFER TO:

L1415 (GOGA-PLAN)

July 20, 2009

Mr. Michael Crabtree
Planning Director
170 Santa Maria Avenue
Pacifica, CA 94044

Re: Proposed Historic Landmark Designation for Sharp Park Golf Course. HLD-6-09

Dear Mr. Crabtree:

Enclosed is our statement regarding the proposed action above. Please make this part of the July 20, 2009 City of Pacifica Planning Commission hearing. If you have any questions, contact Nancy Hornor at (415) 561-4937.

Sincerely,

Frank Dean
Acting General Superintendent

Enclosure:

United States Department of the Interior

NATIONAL PARK SERVICE
Golden Gate National Recreation Area
Fort Mason, San Francisco, California 94123

IN REPLY REFER TO:

NPS Statement on Pacifica Landmark Designation for Sharp Park

July 20, 2009

We learned of the City of Pacifica's proposal to designate Sharp Park Golf Course as a Pacifica Historic Landmark when we received the public hearing notice. We were not notified of this proposal through the Pacifica GGNRA Advisory Committee, which was set up by the Pacifica City Council to discuss items pertinent to both bodies.

As you know, Sharp Park is within the boundary of the Golden Gate National Recreation Area and adjacent to lands that we manage at Sweeney Ridge and Mori Point. We are currently completing a multi-year restoration project at Mori Point, to protect the Endangered San Francisco Garter snake and the threatened Red-legged frog and provide for compatible recreation and community stewardship and educational activities. Therefore, we have an interest in the future of Sharp Park.

Although we concur that the golf course and club house, as well as the remains of the WWII internment camp, should be evaluated, we request that you not make a landmark designation without a professional assessment of the significance and integrity of the property. We can assist with such an evaluation and would like to work with City of Pacifica and the City of San Francisco to define an appropriate process that includes all stakeholders.

PGA design INC
LANDSCAPE ARCHITECTS

CELEBRATING 30 YEARS

October 27, 2011

Bill Wycko
Environmental Review Officer
Planning Department
City of San Francisco
1650 Mission Street, Ste 400
San Francisco, CA 94103-2479

RE: **Sharp Park Golf Course – Historic Resource Evaluation**

Dear Mr. Wycko,

I have reviewed Appendix C of the DEIR for the *Significant Natural Resource Areas Management Plan: Sharp Park Golf Course* and question the determination of eligibility for listing on the National Register of Historic Properties (NRHP). On page 5-4 the author suggests that Sharp Park Golf Course has historic significance under Criterion A and C under the NRHP and Criterion 1 and 3 for the California Register of Historic Resources (CRHR). Criterion C/3 requires that "a property embody the distinctive characteristics of a type, period, or method of construction that represents the work of a master, or that possesses high artistic values". Based on the number and extent of alternations that have taken place since the period of significance (1929 – 1932) I question the validity of finding Sharp Park eligible as a historic resource.

Bulletin 18 "How to Evaluate and Nominate Designed Historic Landscapes,"[1] states "As defined by the National Historic Preservation Act of 1966 and the National Register criteria, to be eligible for the National Register a designed historic landscape must possess significance ..... and integrity of location, design, setting, materials, workmanship feeling and association." Sharp Park Golf Course lacks integrity.

The *Historical Resources Evaluation Report* (HRER) prepared by Tetra Tech, Inc. describes many alterations made to the course since 1932. Comparing the course layouts depicted in the two exhibits included in the Evaluation Report[2] one finds very few similarities between how the course was designed and how it exists today.

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[1] National Park Service, "How to Evaluate and Nominate Designed Historic Landscapes," *National Register Bulletin No. 18*, p. 6.

[2] The original Sharp Park Golf Links plan prepared by Mackenzie, Hunter & Egen (Figure 3) and the aerial of the Existing Golf Course (Figure 2).

Chris Pattillo **Cathy Garrett** **Christopher Kent**

444 - 17th Street Oakland CA 94612
Tel 510.465.1284 Fax 510.465.1256

1. The original hole 1 (now hole 11) was a long, straight shot. The reconfigured hole doglegs to the right.
2. The original hole 2 (now hole 12) was a dogleg that wrapped around the south end of the course. Hole 12 is now a lot shorter with no dogleg.
3. The original holes 3, 4, and 8 were destroyed in a big storm and not replaced.
4. The original hole 5 offered multiple fairway options – a unique design feature of Mackenzie. Hole 17 which replaced 5 is a single straight shot.
5. The original hole 6 that ran east-west at the north boundary no longer exists.
6. The original hole 7 appears to be similar to current hole 16 identified on Figure 2 as having been built after 1941, after the period of significance.
7. The original holes 9 and 10 each offered double fairways. The replacement holes 13 and 14 eliminated these special features.
8. The original hole 11 – a short run - appears to be similar to current hole 15.
9. The original hole 12 was a long straight shot. It has been replaced by hole 18 that is longer with a dogleg.
10. The original holes 13, 14 and 15 were on the east side of the county road and generally paralleled the road running north-south. Today this area has four holes that all run east-west.
11. The original hole 16 was a dogleg left replaced by hole 3 a straight shot.
12. The original hole 17 ran east-west and was a long shot with a dogleg. Hole 8, a short, straight fairway replaced it.
13. The original hole 18 was a dogleg. This hole has been replaced by hole 2, a straight shot.

In summary only hole 11 (now hole 15) is similar to the original design. The layout of the remainder of the course has been substantially altered. The change to the order of how the holes are played is significant as it materially alters the sequence and nature of views the player experiences making it unlike what was intended by the designer. Other major changes implemented since the period of significance include:

A. Elimination or reconfiguration of several sand traps.
B. Construction of a seawall in 1941 to prevent flooding of the golf course. This eliminated views to the beach and Pacific Ocean and the essence of the links design concept.
C. Filling a portion of the lagoon as part of the reconfiguration of hole 10.
D. Installation of concrete golf cart paths along the back nine holes in 1996 where none existed previously.
E. Culverting of water features on five holes and the elimination of water hazards – an important component of the original design.
F. Installation of a 4000-gallon pump to help with annual flooding of Laguna Salada.
G. Alternations made between 1985 and 1994 to accommodate female players such as shortening of the fairways.

Adding together all of these alterations it is apparent that Sharp Park Golf Course lacks sufficient integrity to qualify as a historic resource under criterion C/3. The course no longer reflects the work of Alister Mackenzie. The land use remains a golf course but otherwise there are few similarities between the course that existed during the period of significance and what remains today.

The Evaluation Report notes that Alister Mackenzie attained status as a master golf course architect. Appendix C on page 4-7 notes, "George Shackelford, in his book *Grounds for Golf*, describes Mackenzie as a master designer and offers that Mackenzie's secret to creating unique courses was his talent for routing." Regrettably, today nothing remains of Mackenzie's unique routing. He continues to explain that his work "was known for its original and distinctive bunkers, with irregular shapes and each with its own design." And "Distinctive bunkering, the use of small hillocks around greens, and exciting hole locations were Mackenzie's trademark".

Another of Mackenzie's trademarks was his talent for working with natural landform and subtlety integrating his courses with a site's topography to take full advantage of the unique qualities of each site. Quoting from the HRER, "Mackenzie felt that the success of golf course construction depended entirely on making the best use of natural features and devising artificial ones indistinguishable from nature." The HRER continues with, "..... while many architects try to create a special course, Mackenzie could figure out how best to fit holes into a property and situate a golf course to evoke a comfortable, settled, connection to the ground. His course routings are always functional and original but rarely do they fight the contours of the property."

In summary, defining characteristics of Mackenzie's design style included unique course routing, a talent for adapting a course to fit the land, an ability to offer challenge to players of varying skill levels, distinctively designed bunkers, and inclusion of multiple fairway options – offering advantage to those to took greater risks in their play. The vast majority of these features have been eliminated from the course. According to Wexler, in a recently published article "no appreciable trace of his strategy remains in play."[3]

Unfortunately, Sharp Park Golf Course began to fail even before the course opened in 1932 because Mackenzie failed to fully understand the forces of nature at this site. Page 4-3 of the Evaluation Report notes that the opening was delayed twice due to "drainage problems on the course due to winter rains." Shortly after the course opened a major storm washed out a large portion of the course and necessitated construction of the seawall in 1938 intended to prevent similar damage in the future. This type of damage has continued – as recently as 1982 a major storm wiped out several holes. In 1990 another breach killed many of the cypress trees on the course. Few of the golf courses designed by Alister Mackenzie remain intact today. It would be ironic and misplaced if this course – one that represents a failure in design – became a lasting representative of his life's work by being officially designated as a historic property.

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[3] Dr. Alister Mackenzie, "Sharp Park Golf Course", Pacifica, CA page 113

The determination of historic significance is tied to a site's level of integrity. According to *A Guide to Cultural Landscape Reports: Contents, Process, and Techniques*[4] "The historic integrity of a cultural landscape relates to the ability of the landscape to convey its significance." And "Historic integrity is assessed to determine if the landscape characteristics and associated features, and the spatial qualities that shaped the landscape during the historic period of significance, are present in much the same way as they were historically." Emphasis added.

The guide continues, "Historic integrity is determined by the extent to which the general character of the historic period is evident, and the degree to which incompatible elements obscuring the character can be reversed". In the case of Sharp Park Golf Course the changes to the course were not the result of the normal evolution of a living landscape – maturing trees and other plantings, but rather major changes that were forced to solve functional problems that resulted from flaws in the original design – a failure to fully understand the power of nature and it's ability to wreak havoc. The changes made to Sharp Park Golf Course cannot be reversed because doing so would recreate the conditions that necessitated that the alterations be made in the first place.

Page 5-2 of the HRER notes, "Because landscape features change over time, a landscape need not retain all of the original features it had during its period of significance, but it must retain the essential features and characteristics that make its historic character clearly recognizable."

In essence for a site to meet the criteria of historic significance most of the designed features must look as they did during the period of significance. This may be true for the Clubhouse and maintenance building which are not addressed here, but it is not the case at Sharp Park Golf Course and no doubt explains why "None of the state or national registers identified Sharp Park Golf Course as a historical resource" as noted on page 4-1 of the HRER.

By making the finding that the existing golf course represents a historic resource under criterion C/3 it seems that Tetra Tech failed to appreciate not only the subtleties of golf course architecture but its essential features. Just because there was a golf course present in 1932 the fact that there is still a golf course present today, does not qualify the current course as a historic resource.

---

[4] A Guide To Cultural Landscape Reports: Contents, Process and Techniques by Robert R. Page, Cathy A. Gilbert, and Susan A. Dolan, US Department of the Interior, National Park Service, Cultural Resource Stewardship and Partnerships, 1998.

Sharp Park Golf Course lacks integrity. While a golf course at this site is consistent with the historic land use, that fact is insufficient evidence for a finding of historic significance. Failure to demonstrate significance voids eligibility for historic resource status. I urge you to consider this as you plan for the future use of Sharp Park.

Sincerely,

Chris Pattillo, ASLA
Historic Landscape Architect
President, PGAdesign[inc]

CHRIS PATTILLO

HISTORIC LANDSCAPE ARCHITECT

PROFESSIONAL EXPERIENCE

PGAdesign^{inc}, 1979 to present

EDUCATION - REGISTRATION

Master of Landscape Architecture, 1975, UC Berkeley
Bachelor of Arts, 1972, UC Berkeley
California Landscape Architect, #1925

ASSOCIATIONS

Historic American Landscapes Survey (HALS), No. California Chapter, Co-Founder 2004, Chair 2004-2009 & Vice Chair 2010
American Society of Landscape Architects (ASLA), Member
ASLA Historic Preservation Professional Practice Committee, National Chair & Vice Chair 2006-2009
California Genealogy Society, Vice President & Board member 2010
Garden Conservancy, Member
California Preservation Foundation, Member
National Trust, Member
Oakland Heritage Alliance, Member
Oakland Chamber of Commerce, Member
Oakland Chamber of Commerce Economic Develop Committee
Open Space, Conservation & Recreation Elements (OSCAR), Advisory Committee

AWARDS

Oakland Chamber of Commerce: "Small Business of the Year" 1995
Oakland Chamber of Commerce: "Woman Owned Business of the Year" 2000

RELEVANT PROJECT EXPERIENCE

Badger Pass Ski Area CLR, Yosemite Natl. Park, CA
Doyle Drive in San Francisco Presidio HALS, San Francisco, CA
Atchison Village HSR, Richmond, CA
Meyers Estate Garden Master Plan & Maintenance Guidelines, Union City, CA
Roeding Park HALS, Fresno, CA
Sakai-Oishi Nurseries HALS, Richmond CA
William Land Park Cultural Landscape Survey & Evaluation, Sacramento
Berkeley City Club Gardens HALS, Berkeley, CA

PUBLICATIONS

"Preparing a Historic American Landscapes Survey (HALS) History: Brief Guide to Identifying and Documenting HALS Sites," co-author, *National Park Service, US Dept of the Interior,* Washington DC, August 2010

"Doyle Drive: Using Innovation HALS Methodology," SF Heritage News, Vol. XXXVII, No. 2, Summer 2010

"Innovation HALS Methodology Developed for SF Presidio Project," CPF News, Summer 2009

PRESENTATIONS

Documenting our Heritage, Annual ASLA conference, San Diego, California, October 2011

Historic American Landscapes Survey – An Introduction, for ASLA Chapter Presidents, October 2011

Exploring Cultural Landscapes through Case Studies, California Preservation Foundation (CPF), August 2010

Historic American Landscapes Survey – An Overview, American Society of Landscape Architects (ASLA), July 2010

Doyle Drive HALS at the Presidio of San Francisco, CPF, May 2010

Landscape Within The Historic Context, American Institute of Architects (AIA) Historic Resources Committee, San Francisco, CA, June 2009

Historic American Landscapes Survey – Tools of Preservation, UC Berkeley Extension, Landscape Architecture Program, May 2009

Alviso Adobe Park: History & Design Process – Opening Remarks, Pleasanton, CA, October 2008

Historic American Landscape Survey – A Panel Discussion, ASLA Annual Conference, San Francisco, CA, October 2007

Olmsted in the East Bay – tour leader & speaker, ASLA Annual Conference, San Francisco, CA, October 2007

Oakland Waterfront Parks – tour speaker, ASLA Annual Conference, San Francisco, CA, October 2007

Historic American Landscapes Survey – An Overview, Oakland Heritage Alliance (OHA), Oakland, CA, Summer 2007

Historic American Landscapes Survey – An Overview, Town & Gown Club, Berkeley, CA Spring 2007

Cleveland Cascade – Rehabilitation of a Howard Gilkey Landscape, OHA, Oakland, CA, March 2007

Making a Splash: Preservation of Pools and Fountains, CPF Conference, Sacramento, CA, April 2006

Peralta Hacienda Historical Park – Planning and Design, Friends of Peralta Hacienda, Oakland, CA, December 2005

Kaiser Roof Garden and the Gardens of the Museum of California: Comparing Two Mid-Century Modern Roof Gardens, OHA, Oakland, CA, July 2005

Planning and Public Policy: The Urban Planning Process, Department of City & Regional Planning, UC Berkeley, April 1983

HISTORIC AMERICAN LANDSCAPES SURVEY (HALS) NOMINATION FORMS

Anderson Marsh State Historic Park, Lake County, 2011
Berkeley Women's City Club, Berkeley, 2011
Bidwell Mansion, Chico, 2011
Bidwell Park, Chico, 2011
Boyd Memorial Park, San Rafael, 2010
California Nursery Company Historic Park, Niles, 2008
Call Ranch at Fort Ross State Park, Jenner, 2009
Captain Fletcher's Inn & Manager's House, Navarro, 2009
Centerville Pioneer Cemetery, Fremont, 2008
Children's Fairyland, Oakland, 2009
China Camp State Park, San Rafael, 2009
Fern Dale (Shaw House), Ferndale, 2009
Forest Theater, Carmel, 2010
Henry H. Meyers Garden, Union City, 2010
La Mirada Adobe, Monterey, 2010
Marin Art and Garden Center, Ross, 2009
McConaghy Estate, Hayward, 2009
Meek Mansion & Carriage House, Hayward, 2009
Mendocino Woodlands Demonstration Recreation Area, Mendocino, 2009
Micke Grove Park, Lodi, 2009
Mountain View Cemetery, Oakland, 2010
Point Arena Cove, Point Arena, 2010
Point Arena Lighthouse, Point Arena, 2010
Point Cabrillo Lighthouse, Casper, 2009
Rancho Higuera Adobe Historical Park, 2008
Ravenswood Estate, Livermore, 2009
Robson-Harrington Park, San Anselmo, 2009
Shibata Japanese Garden (Mount Eden Nursery), Hayward, 2010
Shinn Historical House & Arboretum, Fremont, 2008
Sun House, Ukiah, 2009
Tor House, Carmel, 2010
Wassama Village, 2010

SF Historic Preservation Commission: Sharp Park Golf Course Lacks Historic Integrity

06 October 2011 - 22:38
Permalink | Share Item on Facebook

See also:

- Restore Sharp Park — Latest News

In a stunning rebuke to golfers grasping to keep San Francisco subsidizing suburban golf in San Mateo County, on September 21, 2011 San Francisco's Historic Preservation Commission stated that it does not concur that Sharp Park Golf Course is an historic resource.

Watch this annotated audio excerpt of the Historic Preservation Commission hearing.

Sharp Park Golf Course has been losing money and killing endangered species for many years. In September Supervisor John Avalos introduced legislation to transform Sharp Park into a new national park, while providing Sharp Park's current golfers with additional access to affordable golf courses in San Francisco.

But golf privatization groups who oppose national parks convinced San Francisco's Recreation and Parks Department to make-up a case that Sharp Park Golf Course should be protected as an historic resource under the California Environmental Quality Act. As part of this process, the Department asked the Historic Preservation Commission to rubber-stamp its proposal.

However, the Commissioners reviewed the proposal and raised several objections to the Recreation and Parks Department proposal. Led by Commissioner Alan Martinez—who explained that the existing golf course is "a fragment of what it once was"—the Commission could not reach consensus on the golf course's integrity, and unanimously voted that "the commission did not concur on the integrity of the golf course."

The Wild Equity Institute is working with dozens of community, environmental, and history organizations to ensure that the California Environmental Quality Act and San Francisco's historic preservation laws aren't abused by golf privatization groups. The next step in this process is to ensure that the Planning Commission evaluates Sharp Park separately from other natural areas in San Francisco that are undergoing environmental review. Keep your eyes and ears peeled for more updates in the coming weeks.

Edit

Comments

There are no comments so far.

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Historic Photos, Field Notes Show Sharp Park Has Always Been Habitat for Herps--and the Golf Course is Harming Them

19 July 2010 - 18:58

Permalink | Share Item on Facebook

See also:

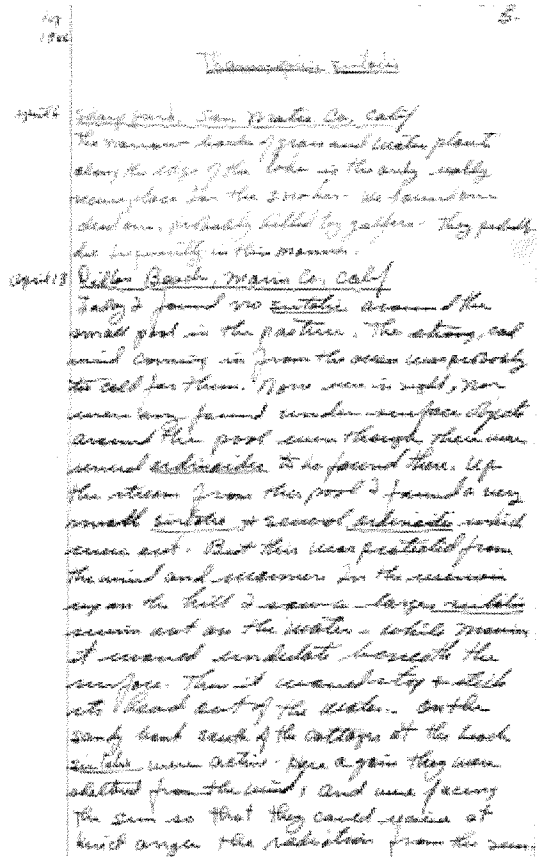
- Restore Sharp Park — Latest News

Rediscovered historic photos of Sharp Park, along with field notes stored at UC Berkeley's Museum of Vertebrate Zoology, indicate that Sharp Park was once excellent habitat for the San Francisco garter snake and the California red-legged frog: and that Sharp Park Golf Course is the primary threat to both species at the site.

This undated photo of Sharp Park shows Laguna Salada before the golf course was built, with Mori Point Ridge in the background.

In this photo, the lagoon is clearly fringed with cattails, vegetation that can't grow in saline environments. This indicates that Laguna Salada was not a "salt lake" as golf privatization advocates have argued, but a fresh lagoon where the San Francisco garter snake and the California red-legged frog could thrive.

At least until Sharp Park Golf Course was built. The earliest systematic biological surveys of San Mateo County were conducted by Dr. Wade Fox—the man who would eventually scientifically describe the San Francisco garter snake—when he was a graduate student at UC Berkeley. Although he died in his prime, Dr. Fox's field notes have been preserved at the UC Berkeley Museum of Vertebrate Zoology. These notes have finally been digitized, and they show that in 1946 Dr. Fox found a dead San Francisco garter snake at Sharp Park, which he concluded was "probably killed by golfers—they probably die frequently in this manner." Presaging the species precipitous decline, Dr. Fox also noted that the only secure area remaining for the species at Sharp Park was in the wet grasses near the lagoon: the surrounding golf links were deadly to the species.



The San Francisco garter snake is now on the brink of extinction, and is probably the most imperiled vertebrate species on the San Francisco Peninsula. Yet since the 1940s Sharp Park Golf Course has been killing this species, and more recently the Golf Course has been found killing both the San Francisco garter snake and the California red-legged frog. We can do better: let's restore Sharp Park and build a better public park on the property. Find out how you can help restore Sharp Park here.

Edit

Comments

There are no comments so far.

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Preview | Save

415-349-5787

Summary for recommending A 18

Karen Swaim to: Munro, David 12/08/2009 09:31 AM

Cc: Lisa Wayne, Dawn Kamalanathan, Jeff Mitchell, Tammy Lim

History: This message has been forwarded.

Comments?

Munro, David wrote:
> See a few comments below.
>
> _____
> From: Lisa Wayne [mailto:Lisa.Wayne@sfgov.org]
> Sent: Monday, December 07, 2009 7:56 PM
> To: Dawn Kamalanathan
> Cc: kswaim@swaimbio.com; Munro, David
> Subject: notes on 30+
>
>
> No disputing sea level rise and salt water intrusion will occur on time frame of 30+ years (confirm year)
>
> Sea level rise will reduce the capacity of sharp park to function as a freshwater wetland that will support frogs and snakes and may not be conducive to golf either.
>
> The main limiting factor for sfgs under sea level rise is a reduction in the amount and quality of freshwater habitat that provides a critical food source for the snake.
>
> Based on most conservative predictions of sea level rise, the majority of sharp park west of highway 1 will not support freshwater wetlands in the long term .
>
> Therefore must think and work regionally (not just sharp) about opportunities to create secure freshwater wetlands on the 30+ year time scale. For exmaple GGNRA land and Calera Creek.
>
> 30 years = approxiamte life of capital improvements including golf course and sea wall. Also the planning horizon for the Alternatives Report. The alternatives report was not intended to assess the intregrity of the sea wall. This study is being done under separate contract. For the purposes of the recovery action, it had to be assumed that the sea wall was either in good enough shape to hold for the planning horizon, or it would be modified as needed to last for the planning horizon.
>
> Now
>
> Species are at risk of local extinction now. Planning for creating wetlands eastward of the current location would likely be a long process and very difficult from a permitting standpoint and would not meet the goals of connecting habitat to Mori Point. There might also be legal challenges associated with moving the sea wall. Meanwhile, the population of the SFGS would continue to decline.
>
> Must do what we can with what is available now to bolster snake populations immediately. The best opportunity to augment snake population quickly is to

make Laguna Salada a functioning system for the snake.
>
> Once thriving population of snake in region, next step to buffer
> against physical changes to sites (i. e., climate change, sea level rise, salt water intrusion)
>
> The wetland complex at sharp park is not expected to provide habitat in perpetuity.
>
>
>
> Lisa Wayne
> San Francisco Recreation and Park Department
> Natural Areas Program / Neighborhood Service Area 10
> 831-6326
>
> 30+ Notes
>
>

--
Karen Swaim
President/Herpetologist

Swaim Biological, Inc
4435 First Street, PMB # 312
Livermore, CA 94551-4915

925.455.8770 phone
925.455.6106 fax


Attachment 4- 1928 Pre-golf aerial photo.pdf


A18 Recommendation.docx


Attachment 2-Mori Sharp Park Linkage Width.pdf


Attachment 3- WOB Habitat Linkages.pdf

Financial Appraisal of Sharp Park Golf Course 2005 - 2015

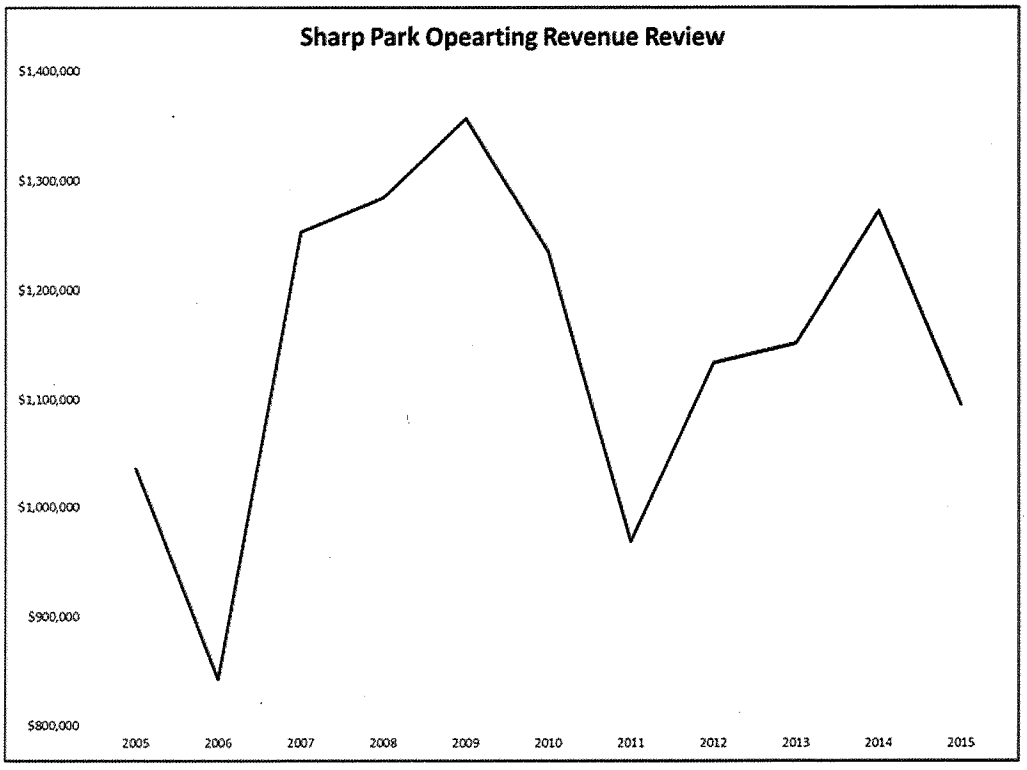
Executive Summary

- Revenue levels over the last ten years have been volatile and it is questionable whether even significant investment in Sharp Park Golf Course would result in revenue growth.
- Sharp Park Golf Course has been loss making for nine out of the last ten years. This has resulted in over $1.1 million of loss for the City of San Francisco.
- Documentation provided in support of expenses for Sharp Park, indicate that there could be significant inaccuracies in the financial reporting of operating expenses on the Revenue and Expenditure Reports.
- Since 2005 $7.9 million has been spent on water and irrigation projects for Sharp Park Gold Course. It does not appear that the depreciation for these expenditures has been included in the Revenue and Expenditure Reports. On this basis, it would appear that a major expense may have been omitted in the Revenue and Expenditure Reports.

Operating Revenue Review

- As illustrated in the graph and table below, operating revenues over the last ten years have highly been volatile.
- The volatility of the revenue makes it challenging to predict whether any investment in the Sharp Park would result in a significant increase in revenue.
- For the purposes of this analysis, revenue from golf green fees, concessions and golf resident cards was included. Interest income and income from the General Fund was excluded as these were not considered to be operating revenue streams.

Financial Year Ending	Sharp Park Operating Revenue
2005	$ 1,035,919
2006	842,895
2007	1,253,087
2008	1,284,381
2009	1,356,712
2010	1,234,844
2011	968,735
2012	1,133,396
2013	1,151,451
2014	1,271,908
2015	$ 1,094,569



Profitability Review

- The Sharp Park Golf Course is not profitable. As shown in the table below, Sharp Park has been loss making for nine out of the last ten years and has resulted in $1,147,064 of loss for the City of San Francisco.
- As discussed above, it is unclear whether any additional investment would increase revenue and return the park to profitability.
- We note that expenses such as 'Equipment' appear to be very low and may be understated in the reports provided by Recreation and Park Department.
- For the purposes of this analysis, we utilized data from the Revenue and Expenditure Reports provided by the Recreation and Park Department.

Description	FY 04/05	FY 05/06	FY 06/07	FY 07/08	FY 08/09	FY 09/10	FY 10/11	FY 11/12	FY 12/13	FY 13/14	FY 14/15	Total
ACTUAL REVENUES:												
Golf Green Fees	$ 893,152	$ 708,852	$1,088,192	$1,128,498	$1,202,113	$1,080,889	$ 839,215	$1,008,232	$1,013,548	$1,128,801	$ 963,939	$ 11,055,431
Concessions	142,767	134,043	164,895	155,883	113,568	94,457	76,180	73,048	79,294	89,280	84,587	1,208,001
Golf Resident Card					41,031	59,498	53,340	52,116	58,609	53,827	46,043	364,465
Total Revenue	1,035,919	842,895	1,253,087	1,284,381	1,356,712	1,234,844	968,735	1,133,396	1,151,451	1,271,908	1,094,569	12,627,898
OPERATING EXPENDITURE:												
Salaries	535,254	546,411	603,005	719,891	643,193	595,412	450,135	536,277	451,926	551,587	583,187	6,216,278
Fringes	128,461	148,124	162,151	183,411	167,128	179,854	169,829	224,919	190,582	235,694	254,736	2,044,889
Overhead	227,966	230,738	281,366	290,313	282,684	336,433	229,954	260,105	224,002	220,011	221,817	2,805,388
Professional & Special Services	1,193	62,522	4,800	59,114	54,486	49,253	58,238	48,233	58,973	56,207	37,169	490,188
Maintenance Services	-	-	-	-	-	-	42,819	36,432	43,753	29,888	32,576	185,468
Rent/Leases Equipment	99	-	-	-	-	1,154	1,182	1,713	2,176	1,945	1,651	9,920
Other Expenses	10,194	22,209	35,678	51,823	62,005	45,893	17,652	18,941	29,720	17,830	18,395	330,341
Materials & Supplies	39,785	50,727	94,857	64,582	56,404	74,092	64,357	81,992	67,731	74,777	67,181	736,484
Equipment	-	-	40,670	-	-	30,137	-	-	-	-	-	70,807
Services of other Deptartments	45,975	39,787	36,736	35,989	32,827	39,344	70,563	96,874	108,907	107,642	114,968	729,613
TOAL OPERATING EXPENDITURE	988,929	1,100,518	1,259,262	1,405,122	1,298,727	1,351,572	1,104,729	1,305,486	1,177,771	1,295,582	1,331,680	13,619,378
												-
OTHER EXPENDITURE												-
Facilities Maintenance	86,969	30,039	32,440	-	-	-	-	-	-	-	-	149,448
Audit	174	164	347	348	-	-	-	-	-	-	-	1,032
Controller Adjustment	-	-	-	-	-	-	-	5,104	-	-	-	5,104
TOTAL OTHER EXPENDITURE	87,143	30,203	32,787	348	-	-	-	5,104	-	-	-	155,584
												-
								-				-
TOTAL EXPENDITURE	1,076,072	1,130,721	1,292,049	1,405,470	1,298,727	1,351,572	1,104,729	1,310,590	1,177,771	1,295,582	1,331,680	13,774,962
												-
Operating Profit / (Loss)	$ (40,153)	$ (287,826)	$ (38,962)	$ (121,090)	$ 57,985	$ (116,727)	$ (135,994)	$ (177,193)	$ (26,319)	$ (23,674)	$ (237,111)	$ (1,147,064)
Notes:												
1 Golf Resident Card revenue and expenses were apportioned to each course according to that course's % contribution to golf fund allocated revenues and allocated operating expenditures, respectively.												
2 General Fund Support was removed from revenue.												
3 Interest earned was removed from revenues as it does not represent an operating revenue												
4 Repayment to Open Space Fund was eliminated.												
Source: San Francisco Recreation & Park Dept. Golf Revenue & Expenditure Reports												

Accuracy of Expenses

- We requested documentation from the Recreation and Park Department to verify operating expenses included in the Revenue and Expenditure Reports. We were provided with payroll documentation for 2014 and 2015 in support of Sharp Park payroll costs. We were not provided with adequate documentation to review the reliability of other expenses.
- The supporting payroll documentation provided indicated that payroll expenses may have been significantly understated in the financial year 2014/2015. As shown in the table below, annual salary costs were listed as $583,187, however, the payroll data indicates that actual costs were $982, 495.
- As inaccuracies have been observed in the presentation of payroll expenses, it is possible that other operating expenses included in the Revenue and Expenditure Reports have also been understated.

- On this basis, it is possible that the losses generated by Sharp Park may have been significantly understated and the cost to the City of San Francisco of operating Sharp Park may be higher than stated on the Revenue and Expenditure Reports.

Month	Salary	Fringe
Jul-14	$ 45,867	$ 21,100
Aug-14	384,816	157,758
Sep-14	48,393	20,904
Oct-14	50,669	21,661
Nov-14	45,898	20,963
Dec-14	48,022	20,855
Jan-15	47,887	23,058
Feb-15	73,803	27,378
Mar-15	61,460	24,806
Apr-15	48,153	21,259
May-15	45,247	21,641
Jun-15	82,279	36,588
Total	$ 982,495	$ 417,971
Per 2014/2015 Budget Reports	$ 583,187	$ 254,736

Source: Payroll report provided by San Francisco Recreation and Park Department

Accounting for Capital Expenditure

- Data extracted from the Monthly Capital Reports generated by the Recreation and Park department, show that since 2005, $7.9 million has been spent on capital water and irrigation projects for Sharp Park Gold Course (see the table below).
- Per GASB Statement No. 34, capital assets should be depreciated over their 'useful life'. As a result, we would expect to see an amount for depreciation included in the Revenue and Expenditure Reports to account for the capital expenditures on water and irrigation systems.
- As depreciation for these expenditures does not appear to have been included in the Revenue and Expenditure Reports, it is possible that a major expense may have been omitted in the Revenue and Expenditure Reports.

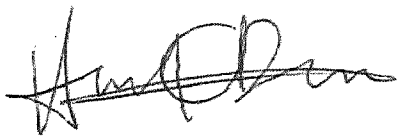
Fiscal Year	Capital Plan Project Name	Budget	Expended
2005-2006	Lincoln and Sharp Irrigation	$ 620,977	$ 620,977
	Sharp Park Water Tank	125,414	125,414
		746,391	746,391
2006-2007	Lincoln and Sharp Irrigation	620,977	620,977
	Sharp Park Water Tank	125,414	125,414
		746,391	746,391
2007-2008	Lincoln and Sharp Irrigation	620,976	620,976
	Sharp Park Water Tank	125,414	125,414
		746,390	746,390
2008-2009	Lincoln and Sharp Irrigation	620,976	620,976
	Sharp Park Water Tank	125,414	125,414
		746,390	746,390
2009-2010	Lincoln and Sharp Irrigation	620,976	620,976
	Sharp Park Water Tank	125,414	125,414
		746,390	746,390
2010-2011	Lincoln and Sharp Irrigation	620,976	620,976
	Sharp Park Water Tank	125,414	125,414
		746,390	746,390
2011-2012	Lincoln and Sharp Irrigation	620,976	620,976
	Sharp Park Water Tank	125,414	125,414
		746,390	746,390
2012-2013	Lincoln and Sharp Irrigatior	620,976	620,976
	Sharp Park Water Tank	125,414	125,414
	Sharp Park Recycled Water Project	343,939	332,465
		1,962,133	1,950,659
2013-2014	Lincoln and Sharp Irrigation	620,976	620,976
	Sharp Park Water Tank	133,170	131,358
	Sharp Park Recycled Water Project	343,939	343,909
	Sharp Park Golf Course Irrigation Retrofit	200,000	
	Sharp Park Infrastructure and Pumphouse	359,638	259,729
		1,657,723	1,355,972
2014-2015	Lincoln and Sharp Irrigation	620,976	620,976
	Sharp Park Water Tank	133,170	131,358
	Sharp Park Recycled Water Project	343,939	343,909
	Sharp Park Golf Course Irrigation Retrofit	549,000	490,578
	Sharp Park Infrastructure and Pumphouse	1,209,684	400,880
	Sharp Park Pump Replacement	850,000	507,896
		3,706,769	2,495,597
Grand Total		$ 12,551,357	$ 11,026,960
Less: Lincon Park Allocation (50% of Irrigation Costs)		$ (3,104,881)	$ (3,104,881)
Total Sharp Park Expenditure		$ 9,446,476	$ 7,922,079

Author Credentials

- I am an Associate member of the Institute of Chartered Accountants of England and Wales (UK equivalent to CPA) with five years of experience in forensic accounting and international financial litigation.
- I have significant experience in:
    - Assessing and critiquing the reasonableness of financial forecasts and business projections by reviewing financial accounts, internal accounting data, budgets and industry data,
    - Investigating insurance losses by analyzing financial records and accounting documentation,
    - Investigating fraud and corruption claims.

Limitations

- This analysis is based on documentation provided by the Wild Equity Institute and the Recreation and Park Department. This analysis does not represent an audit of the Recreation and Park Department's financial statements in accordance with generally accepted auditing standards. This report is dependent on the accuracy of the information provided by Wild Equity Institute and the Recreation and Park Department.



Hannah Dingley

SAN FRANCISCO
PLANNING DEPARTMENT

2017 JAN 17 AM 9:36

BF

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DRAFT Planning Commission Motion
NO. M-XXXXX
HEARING DATE: December 15, 2016

Hearing Date:	December 15, 2016
Case No.:	**2005.0912E**
Project Address:	**Significant Natural Resource Areas Management Plan[1]**
Zoning:	N/A
Block/Lot:	31 Natural Areas in San Francisco and Pacifica (various parcels)
Project Sponsor:	San Francisco Recreation and Parks Department Stacy Bradley – (415) 575-5609 stacy.bradley@sfgov.org
Staff Contact:	Melinda Hue – (415) 575-9041 melinda.hue@sfgov.org

ADOPTING FINDINGS RELATED TO THE CERTIFICATION OF A FINAL ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED SIGNIFICANT NATURAL RESOURCE AREAS MANAGEMENT PLAN.

MOVED, that the San Francisco Planning Commission (hereinafter "Commission") hereby CERTIFIES the final Environmental Impact Report identified as Case No. 2005.0912E, the "Significant Natural Resource Areas Management Plan" (hereinafter 'Project"), based upon the following findings:

1. The City and County of San Francisco, acting through the Planning Department (hereinafter "Department") fulfilled all procedural requirements of the California Environmental Quality Act (Cal. Pub. Res. Code Section 21000 *et seq.*, hereinafter "CEQA"), the State CEQA Guidelines (Cal. Admin. Code Title 14, Section 15000 *et seq.*, (hereinafter "CEQA Guidelines") and Chapter 31 of the San Francisco Administrative Code (hereinafter "Chapter 31").

   A. The Department determined that an Environmental Impact Report (hereinafter "EIR") was required and provided public notice of that determination by publication in a newspaper of general circulation on April 22, 2009.

   B. The Department held a public scoping meeting on May 12, 2009 and May 14, 2009 in order to solicit public comment on the scope of the Project's environmental review.

   C. On August 31, 2011, the Department published the Draft Environmental Impact Report (hereinafter "DEIR") and provided public notice in a newspaper of general circulation of the availability of the DEIR for public review and comment and of the date and time of the Planning

[1] The Significant Natural Resource Areas Management Plan, or SNRAMP, is now referred to as the Natural Resources Management Plan; however, to maintain consistency between the Draft EIR and the RTC document, the term SNRAMP will continue to be used.

Commission public hearing on the DEIR; this notice was mailed to the Department's list of persons requesting such notice.

D. On August 31, 2011, copies of the DEIR were mailed or otherwise delivered to a list of persons requesting it, to those noted on the distribution list in the DEIR, and to government agencies, the latter both directly and through the State Clearinghouse.

E. Notice of Completion was filed with the State Secretary of Resources via the State Clearinghouse on August 31, 2011.

2. The Commission held a duly advertised public hearing on said DEIR on October 6, 2011 at which opportunity for public comment was given, and public comment was received on the DEIR. The period for acceptance of written comments ended on October 31, 2011.

3. On April 27, 2012, the Department opened a second public review and comment period for the DEIR, and provided public notice in a newspaper of general circulation of the availability of the second public review and comment period; this notice was mailed to the Department's list of persons requesting such notice and to neighborhood groups registered with the Department at that time. The period for acceptance of written comments ended on June 11, 2012.

4. The Department prepared responses to comments on environmental issues received at the public hearing and in writing during the first 61-day public review period and the second 45-day public review period for the DEIR, prepared revisions to the text of the DEIR in response to comments received or based on additional information that became available during the public review period, and corrected errors in the DEIR. This material was presented in a Comments and Responses document, published on November 16, 2016, distributed to the Commission and all parties who commented on the DEIR, and made available to others upon request at the Department.

5. A Final Environmental Impact Report (hereinafter "FEIR") has been prepared by the Department, consisting of the DEIR, any consultations and comments received during the review process, any additional information that became available, and the Comments and Responses document all as required by law.

6. Project EIR files have been made available for review by the Commission and the public. These files are available for public review at the Department at 1650 Mission Street, Suite 400, and are part of the record before the Commission.

7. On December 15, 2016, the Commission reviewed and considered the information contained in the FEIR and hereby does find that the contents of said report and the procedures through which the FEIR was prepared, publicized, and reviewed comply with the provisions of CEQA, the CEQA Guidelines, and Chapter 31 of the San Francisco Administrative Code.

8. The project sponsor has indicated that the presently preferred alternative is the Significant Natural Resources Area Management Plan.

9. The Planning Commission hereby does find that the FEIR concerning File No. 2005.0912E: Significant Natural Resources Area Management Plan reflects the independent judgement and analysis of the City and County of San Francisco, is adequate, accurate and objective, and that the Comments and Responses document contains no significant revisions to the DEIR that would require recirculation of the document pursuant to CEQA Guideline Section 15088.5, and hereby does CERTIFY THE COMPLETION of said FEIR in compliance with CEQA, the CEQA Guidelines and Chapter 31 of the San Francisco Administrative Code.

10. The Commission, in certifying the completion of said FEIR, hereby does find that the project described in the Environmental Impact Report and the project preferred by the project sponsor, described as the Significant Natural Resources Area Management Plan in FEIR would have the following significant unavoidable environmental impacts, which cannot be mitigated to a level of insignificance:

    A. A significant project specific and cumulative impact on Sharp Park Golf Course, a historic resource under CEQA, due to modification of golf holes for restoration activities;

    B. A significant cumulative impact on recreation in dog play areas (DPAs) within Natural Areas due to increased use resulting from the reduction of dog play areas by the project and potentially by the National Park Service's (NPS) Dog Management Plan within the Golden Gate National Recreation Area (GGNRA);

    C. A significant cumulative impact on biological resources within Natural Areas DPAs due to increased use resulting from the reduction of dog play areas by the project and potentially by the NPS Dog Management Plan within the GGNRA; and

    D. A significant project-specific and cumulative impact on air quality from activities such as trail construction, hillside stabilization, erosion control, and tree removal.

11. The Planning Commission reviewed and considered the information contained in the FEIR prior to approving the Project.

I hereby certify that the foregoing Motion was ADOPTED by the Planning Commission at its regular meeting of December 15, 2016.

Jonas P. Ionin
Commission Secretary

AYES:

NOES:

ABSENT:

ADOPTED:

ATTACHMENT 1

CALIFORNIA ENVIRONMENTAL QUALITY ACT FINDINGS: FINDINGS OF FACT, EVALUATION OF MITIGATION MEASURES AND ALTERNATIVES, AND STATEMENT OF OVERRIDING CONSIDERATIONS

SAN FRANCISCO RECREATION AND PARK COMMISSION

December 15, 2016

I. PREAMBLE

In determining to approve the Natural Resources Management Plan ("Project" and "Management Plan") as described in Section II.A, Project Description, below, the San Francisco Recreation and Park Commission ("Commission") makes and adopts the following findings of fact and decisions regarding the Project, and mitigation measures, and alternatives based on substantial evidence in the whole record of this proceeding and under the California Environmental Quality Act, California Public Resources Code Sections 21000 et seq. ("CEQA"), the Guidelines for Implementation of CEQA, 14 California Code of Regulations Sections 15000 et seq. ("CEQA Guidelines"), and Chapter 31 of the San Francisco Administrative Code ("Chapter 31").

This document is organized as follows:

Section II provides a description of the proposed Project, Project objectives, the environmental review process for the Project, the approval actions to be taken, and the location of records;

Section III identifies impacts of the Project found not to be significant as well as the Project's potentially significant impacts that can be avoided or reduced to less-than-significant levels through mitigation and describes the disposition of the mitigation measures;

Section IV identifies significant project-specific and cumulative impacts that cannot not be eliminated or reduced to a less-than-significant level and describes any applicable mitigation measures as well as the disposition of the mitigation measures;

Section V identifies the Project alternatives that were analyzed in the EIR and the economic, legal, social, technological, and other considerations that support approval of the project and the rejection as infeasible of alternatives, or elements thereof, analyzed;

Section VI sets forth the Commission's Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093.

The Mitigation Monitoring and Reporting Program ("MMRP") for the mitigation measures that have been proposed for adoption is attached with these findings as Attachment 2 to Motion No. _____. The MMRP is required by CEQA Section 21081.6 and CEQA Guidelines Section 15091. The MMRP provides a table setting forth each mitigation measure listed in the Final Environmental Impact Report for the Project ("Final EIR") that is required to reduce or avoid a significant adverse impact. The MMRP also specifies the agency responsible for implementation of each measure and establishes monitoring actions and a monitoring schedule. The full text of the mitigation measures is set forth in the MMRP.

These findings are based upon substantial evidence in the entire record before the Commission. The references set forth in these findings to certain pages or sections of the Draft Environmental Impact

Report ("Draft EIR" or "DEIR") or the Responses to Comments document ("RTC"), which together constitute the Final Environmental Impact Report ("Final EIR" or "FEIR") are for ease of reference and are not intended to provide an exhaustive list of the evidence relied upon for these findings.

II. PROJECT DESCRIPTION AND PROCEDURAL BACKGROUND

a. Project Description

The project sponsor, San Francisco Recreation and Park Department ("SFRPD") proposes to adopt the Natural Resources Management Plan ("NRMP"). The Project area encompasses 32 Natural Areas that are scattered mostly throughout the central and southern portions of San Francisco and constitute approximately four percent of the total city area; one natural area is in Pacifica. The areas range in size from less than one acre to almost 400 acres and include such popular locations as Twin Peaks and portions of Glen Canyon Park. The Management Plan will guide activities on properties owned or maintained by the SFRPD through its Natural Resources Program.

The Natural Areas include the following areas in San Francisco: Balboa; Bayview Park; Bernal Hill; Billy Goat Hill; Brooks Park; Buena Vista Park; Corona Heights; Dorothy Erskine Park; Duncan-Castro; Edgehill Mountain; Everson/Digby; Fairmount Park; Glen Canyon and O'Shaughnessy Hollow; Golden Gate Heights; Golden Gate Park Oak Woodlands; Grandview Park; Hawk Hill; India Basin Shoreline Park; Interior Greenbelt; Kite Hill; Lake Merced; Lakeview/Ashton Mini Park; McLaren Park; Mount Davidson; Palou-Phelps; Pine Lake; Rock Outcrop; Tank Hill; Twin Peaks; and 15th Avenue Steps. Sharp Park in Pacifica is also a Natural Area.

Fragments of unique plant and animal habitats within San Francisco and Pacifica, known as Natural Resource Areas (Natural Areas), have been preserved within the parks that are managed by the San Francisco Recreation and Park Department (SFRPD). In the late 1990s, the SFRPD initiated a Natural Areas Program to protect and manage these Natural Areas. Over the course of several years, the SFRPD developed the Natural Resources Management Plan, with the final draft plan published in February 2006. The NRMP contains detailed information on the biology, geology, and trails within 32 Natural Areas, 31 in San Francisco and one (Sharp Park) in Pacifica. The NRMP 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 Management Plan delineates the acreage within each Natural Area into management area categories based on the management priority. The NRMP prescribes both general management activities that apply to all Natural Areas and management activities specific to each Natural Area. The NRMP identifies a number of goals with respect to conservation and restoration, education, research, stewardship, recreation, and monitoring goals. Recommended actions identified for each Natural Area are intended to meet the overall goals of the NRMP and may include, but are not limited to, habitat restoration, removal of invasive species, tree removal, erosion control, trail closure, relocation or creation, and closure or reduction of dog play areas. Individual Natural Areas may be identified as an entire park or only a portion of the park. Unless otherwise specified in the NRMP or the Draft EIR, management actions apply only to the geographic boundary of the Natural Area.

The Management Plan identifies a number of objectives and goals of the Natural Areas Program. For the purposes of CEQA, the project objectives are as follows:

- To identify issues and impacts adversely affecting ecosystem functions and biological diversity;
- To identify, prioritize, and implement restoration and management actions designed to promote the functioning of San Francisco's native ecosystem, including the maintenance and enhancement of native biodiversity;
- To identify and prioritize monitoring of natural resources to support an adaptive management approach;
- To provide guidelines for passive recreation compatible with San Francisco's natural resources;
- To provide guidelines for education, research, and stewardship programs; and
- To restore the Laguna Salada wetland complex for the benefit of special status species.

b. Environmental Review

On April 22, 2009, the Planning Department determined that an Environmental Impact Report ("EIR") was required and provided public notice of that determination by publication in a newspaper of general circulation.

The Planning Department held a public scoping meeting on May 12, 2009 and May 14, 2009 in order to solicit public comment on the scope of the Project's environmental review.

On August 31, 2011, the Planning Department published the Draft Environmental Impact Report ("DEIR") and provided public notice in a newspaper of general circulation of the availability of the DEIR for public review and comment and of the date and time of the Planning Commission public hearing on the DEIR; this notice was mailed to the Planning Department's list of persons requesting such notice.

On August 31, 2011, copies of the DEIR were mailed or otherwise delivered to a list of persons requesting it, to those noted on the distribution list in the DEIR, to adjacent property owners, and to government agencies, the latter both directly and through the State Clearinghouse.

Notice of Completion was filed with the State Secretary of Resources via the State Clearinghouse on August 31, 2011.

The Planning Commission held a duly advertised public hearing on said DEIR on October 6, 2011 at which opportunity for public comment was given, and public comment was received on the DEIR. The period for acceptance of written comments ended on October 31, 2011.

On April 27, 2012, the Planning Department opened a second public review and comment period for the DEIR, and provided public notice in a newspaper of general circulation of the availability of the second public review and comment period; this notice was mailed to the Planning Department's list of persons requesting such notice. The period for acceptance of written comments ended on June 11, 2012.

The Planning Department prepared responses to comments on environmental issues received at the public hearing and in writing during the first 61-day public review period and the second 45-day public review period for the DEIR, prepared revisions to the text of the DEIR in response to comments received or based on additional information that became available during the public review period, and corrected errors in the DEIR. This material was presented in a Comments and Responses document, published on

November 16, 2016, distributed to the Planning Commission and all parties who commented on the DEIR, and made available to others upon request at the Planning Department.

The FEIR was prepared by the Planning Department, consisting of the DEIR, any consultations and comments received during the review process, any additional information that became available, and the Comments and Responses document all as required by law.

The FEIR is both a project-level and a programmatic EIR. A project-level EIR is generally the most common type of EIR, and it examines the environmental impacts of a specific project. This level of CEQA review focuses primarily on the changes in the environment that would result from a project and examines all phases of the project, including planning, construction, and operation (CEQA Guidelines Section 15168). Project-level review has been selected as the appropriate level of CEQA review for the NRMP's routine maintenance activities and the Sharp Park restoration activities. These components of the NRMP have been developed to a sufficient level of detail to allow project-level environmental review.

Program-level CEQA review is used in environmental analyses for a series of actions that can be characterized as one large project because they are logically related. The series of actions can be related geographically, or be logical parts in the chain of contemplated actions. Program-level review is used in connection with the issuance of rules, plans, or other general criteria to govern the conduct of a continuing program. Programmatic review is also appropriate for individual activities carried out under the same authorizing statutory or regulator authority, that have generally similar environmental effects which can be mitigated in similar ways (CEQA Guidelines Section 15168). Program-level review has been selected as the appropriate level of CEQA review for the NRMP's large-scale projects because these projects are long-term projects that have not been fully developed to enable project-level environmental review. Once funding is available for long-term projects, additional design and development of the project would commence, allowing for a greater understanding of project-level environmental impacts.

Project EIR files have been made available for review by the Planning Commission, the Commission, and the public. These files are available for public review at the Department at 1650 Mission Street, Suite 400, and are part of the record before the Commission.

On December 15, 2016, the Planning Commission reviewed and considered the information contained in the FEIR and found that the contents of said report and the procedures through which the FEIR was prepared, publicized, and reviewed comply with the provisions of CEQA, the CEQA Guidelines, and Chapter 31 of the San Francisco Administrative Code. The Planning Commission certified the FEIR as adequate, accurate, and complete.

c. Commission Actions

The Commission is currently considering various actions ("Actions") in furtherance of the Project, which include, but are not limited to the following:

- Approval of the Natural Resources Management Plan.

d. Location of Records

The record upon which all findings and determinations related to the adoption of the Project are based include the following:

- The FEIR, and all documents referenced in or relied upon by the EIR;
- All information (including written evidence and testimony) provided by City staff to the Planning Commission relating to the FEIR, the proposed approvals and entitlements, the Project, and the alternatives set forth in the FEIR;
- All information (including written evidence and testimony) presented to the Planning Commission by the environmental consultant and subconsultants who prepared the FEIR, or incorporated into reports presented to the Planning Commission;
- All information (including written evidence and testimony) presented to the City from other public agencies relating to the Project or the FEIR;
- All applications, letters, testimony, and presentations presented to the City by the Project sponsor and its consultants in connection with the Project;
- All information (including written evidence and testimony) presented at any public hearing or workshop related to the Project and the FEIR;
- The Mitigation Monitoring and Reporting Program (MMRP); and
- All other documents comprising the record pursuant to Public Resources Code Section 21167.6(e).

The public hearing transcript, a copy of all letters regarding the Final EIR received during the public review period, the administrative record, and background documentation for the Final EIR are located at the Planning Department, 1650 Mission Street, 4th Floor, San Francisco. The Planning Commission Secretary is the custodian of these documents and materials. The Library Commission Secretary is the custodian of Project documents and materials on file at the SFPL Main Library. The Recreation and Park Commission Secretary is the custodian of Project documents and materials on file at the Recreation and Park Department Headquarters in Golden Gate Park.

These findings are based upon substantial evidence in the entire record before the Commission. The references set forth in these findings to certain pages or sections of the DEIR, the RTC or the Final EIR are for ease of reference and are not intended to provide an exhaustive list of the evidence relied upon for these findings.

In making these findings, the opinions of the Planning Department and other City staff and experts, other agencies and members of the public have been considered. These findings recognize that the determination of significance thresholds is a judgment within the discretion of the City and County of San Francisco; the significance thresholds used in the Final EIR are supported by substantial evidence in the record, including the expert opinion of the Final EIR preparers and City staff; and the significance thresholds used in the Final EIR provide reasonable and appropriate means of assessing the significance of the adverse environmental effects of the Project.

These findings do not attempt to describe the full analysis of each environmental impact contained in the Final EIR. Instead, a full explanation of these environmental findings and conclusions can be found in the Final EIR and these findings hereby incorporate by reference the discussion and analysis in the Final EIR supporting the determination regarding the Project impacts and mitigation measures designed to address those impacts. In making these findings, the determinations and conclusions of the Final EIR relating to environmental impacts and mitigation measures, are hereby ratified, adopted and incorporated in these

findings, except to the extent any such determinations and conclusions are specifically and expressly modified by these findings.

III. LESS-THAN-SIGNIFICANT IMPACTS AND FINDINGS REGARDING MITIGATION MEASURES

Under CEQA, no mitigation measures are required for impacts that are less than significant (Pub. Res. Code § 21002; CEQA Guidelines §§ 15126.4, subd. (a)(3), 15091). As more fully described in the Final EIR and based on the evidence in the whole record of this proceeding, it is hereby found that implementation of the Project would not result in any significant impacts in the following areas and that these impact areas therefore do not require mitigation: Land Use and Land Use Planning, Aesthetics, Wind and Shadow, and Agriculture and Forest Resources.

CEQA requires agencies to adopt mitigation measures that would avoid or substantially lessen a project's identified significant impacts or potential significant impacts if such measures are feasible. As more fully described in the Final EIR and based on the evidence in the whole record of this proceeding, it is hereby found that implementation of the Project would result in certain identified significant impacts, but that adoption of mitigation measures would avoid or substantially lessen these impacts with regard to: Cultural & Paleontological Resources, Recreation, Biological Resources, Hydrology and Water Quality, Hazards and Hazardous Materials, and Air Quality.

The findings in this section concern mitigation measures discussed in the Final EIR, presented in a Mitigation Monitoring and Reporting Program ("MMRP"), and attached as Attachment 2 to these Findings, which are hereby adopted and incorporated as conditions of Project approval. The Final EIR includes a series of mitigation measures that have been identified that would eliminate or reduce to a less-than-significant level the NRMP's potential environmental impacts of the Project listed in this section. All of the mitigation measures set forth in the Final EIR that are needed to reduce or avoid these significant adverse environmental impacts are contained in Attachment 2. Accordingly, in the event a mitigation measure recommended in the Final EIR has inadvertently been omitted in these findings or the MMRP, such mitigation measure is nevertheless hereby adopted and incorporated in the findings below by reference. In addition, in the event the language describing a mitigation measure set forth in these findings or the MMRP fails to accurately reflect the mitigation measure in the Final EIR due to a clerical error, the language of the mitigation measure as set forth in the Final EIR shall control. The impact numbers and mitigation measure numbers used in these findings reflect the numbers contained in the Final EIR.

The Commission finds that the mitigation measures, as set forth in the Attached Exhibit 1 to this Resolution, are feasible and adopts these measures as conditions of Project approval. In no instance are the conclusions of the Final EIR, or the mitigation measures recommended in the Final EIR for the Project, being rejected.

a. Cultural and Paleontological Resources

Architectural Resources

Impact CP-1: Implementation of programmatic projects under the NRMP would result in a substantial adverse change in the significance of historical architectural resources, including historic landscapes.

The following mitigation measure, as more fully described in the Final EIR, is hereby adopted in the form set forth in the Final EIR and the attached MMRP and will be implemented as provided therein.

M-CP-1: Consultation with the San Francisco Planning Department

The Commission finds that the foregoing mitigation measure is feasible and will mitigate the potential impacts of project construction on architectural resources and landscapes to a less-than-significant level because the measures, which are adopted as conditions of project approval, provide adequate protection against significant impacts to potential architectural resources and landscapes that may exist on the project site(s).

Archaeological Resources

Impact CP-10: Implementation of programmatic projects under the NRMP would result in a substantial adverse change in the significance of archaeological resources in Natural Areas of high archaeological sensitivity.

The following mitigation measure, as more fully described in the Final EIR, is hereby adopted in the form set forth in the Final EIR and the attached MMRP and will be implemented as provided therein.

M-CP-10: Archaeological Monitoring Program for Programmatic Projects in Natural Areas with High Archaeological Sensitivity, Routine Maintenance Activities at Tank Hill and Lake Merced, and the Sharp Park Restoration Project

Impact CP-11: Implementation of programmatic projects under the NRMP would result in a substantial adverse change in the significance of archaeological resources in Natural Areas of moderate and low archaeological sensitivity.

The following mitigation measure, as more fully described in the Final EIR, is hereby adopted in the form set forth in the Final EIR and the attached MMRP and will be implemented as provided therein.

M-CP-11: Accidental Discovery

Impact CP-12: Implementation of routine maintenance under the NRMP would result in a substantial adverse change in the significance of archaeological resources in any of the Natural Areas, with the exception of Lake Merced and Tank Hill Natural Areas.

The following mitigation measures, as more fully described in the Final EIR, are hereby adopted in the form set forth in the Final EIR and the attached MMRP and will be implemented as provided therein.

M-CP-11: Accidental Discovery

M-CP-12: Annual Archaeological Sensitivity Training for Natural Areas Program Staff Involved with Routine Maintenance Activities in all Natural Areas

Impact CP-13: Implementation of routine maintenance under the NRMP would result in a substantial adverse change in the significance of archaeological resources in the Lake Merced and Tank Hill Natural Areas.

The following mitigation measures, as more fully described in the Final EIR, are hereby adopted in the form set forth in the Final EIR and the attached MMRP and will be implemented as provided therein.

> *M-CP-10: Archaeological Monitoring Program for Programmatic Projects in Natural Areas with High Archaeological Sensitivity, Routine Maintenance Activities at Tank Hill and Lake Merced, and the Sharp Park Restoration Project*
>
> *M-CP-12: Annual Archaeological Sensitivity Training for Natural Areas Program Staff Involved with Routine Maintenance Activities in all Natural Areas*

Impact CP-14: Implementation of the Sharp Park restoration efforts under the NRMP would result in a substantial adverse change in the significance of archaeological resources.

The following mitigation measure, as more fully described in the Final EIR, is hereby adopted in the form set forth in the Final EIR and the attached MMRP and will be implemented as provided therein.

> *M-CP-10: Archaeological Monitoring Program for Programmatic Projects in Natural Areas with High Archaeological Sensitivity, Routine Maintenance Activities at Tank Hill and Lake Merced, and the Sharp Park Restoration Project*

The Commission finds that the foregoing mitigation measures are feasible and will mitigate the potential impacts of project construction on archaeological resources and landscapes to a less-than-significant level because the measures, which are adopted as conditions of project approval, provide adequate protection against material damage to potential underground cultural resources that may exist on the project site(s).

Paleontological Resources

Impact CP-15: Implementation of programmatic projects under the NRMP would directly or indirectly destroy paleontological resources or unique geological formations.

The following mitigation measure, as more fully described in the Final EIR, is hereby adopted in the form set forth in the Final EIR and the attached MMRP and will be implemented as provided therein.

> *M-CP-15: Coordination with EP Regarding Paleontological Resources Prior to Implementation of Programmatic Projects*

Impact CP-16: Implementation of routine maintenance under the NRMP would directly or indirectly destroy paleontological resources or unique geological formations.

The following mitigation measure, as more fully described in the Final EIR, is hereby adopted in the form set forth in the Final EIR and the attached MMRP and will be implemented as provided therein.

> *M-CP-16: Avoidance of Surface Bedrock in Routine Maintenance Activities*

Impact CP-17: Implementation of Sharp Park restoration activities under the NRMP would directly or indirectly destroy paleontological resources or unique geological formations.

The following mitigation measure, as more fully described in the Final EIR, is hereby adopted in the form set forth in the Final EIR and the attached MMRP and will be implemented as provided therein.

M-CP-17: Paleontological Training Program and Alert Sheet for the Sharp Park Restoration Project

The Commission finds that the foregoing mitigation measures are feasible and will mitigate the potential impacts of project construction on paleontological resources to a less-than-significant level because the measures, which are adopted as conditions of project approval, provide adequate protection against material damage to potential paleontological resources that may exist on the project site(s).

Human Remains

Impact CP-18: Implementation of programmatic projects under the NRMP would disturb human remains.

The following mitigation measure, as more fully described in the Final EIR, is hereby adopted in the form set forth in the Final EIR and the attached MMRP and will be implemented as provided therein.

M-CP-18: Human Remains, Associated or Unassociated Funerary Objects.

Impact CP-19: Implementation of routine maintenance under the NRMP would disturb human remains.

The following mitigation measure, as more fully described in the Final EIR, is hereby adopted in the form set forth in the Final EIR and the attached MMRP and will be implemented as provided therein.

M-CP-18: Human Remains, Associated or Unassociated Funerary Objects.

Impact CP-20: Implementation of Sharp Park restoration activities under the NRMP would disturb human remains.

The following mitigation measure, as more fully described in the Final EIR, is hereby adopted in the form set forth in the Final EIR and the attached MMRP and will be implemented as provided therein.

M-CP-18: Human Remains, Associated or Unassociated Funerary Objects.

The Commission finds that the foregoing mitigation measure is feasible and will mitigate the potential impacts of project construction related to human remains to a less-than-significant level because the measure, which is adopted as a condition of project approval, provides adequate protection against material damage to potential human remains that may exist on the project site(s).

b. Recreation

Impact RE-6: Implementation of the Sharp Park restoration activities under the NRMP would have a substantial adverse effect on the physical characteristics of existing recreation facilities.

The following mitigation measure, as more fully described in the Final EIR, is hereby adopted in the form set forth in the Final EIR and the attached MMRP and will be implemented as provided therein.

M-RE-6: Restoration of the Sharp Park Golf Course to 18 Playable Holes

c. The Commission finds that the foregoing mitigation measure is feasible and will mitigate the potential impacts of project construction related to recreation to a less-than-significant level through the restoration of Sharp Park Golf Course to 18 Playable Holes. This measure is adopted as a condition of project approval.

Biological Resources

Special Status Species

Impact BI-1: The NRMP and implementation of programmatic projects proposed under the NRMP would have a substantial adverse effect on special status plant species.

The following mitigation measure, as more fully described in the Final EIR, is hereby adopted in the form set forth in the Final EIR and the attached MMRP and will be implemented as provided therein.

M-BI-1a: Protection of Protected Species and Riparian and Wetland Habitat

M-BI-1b: Protection of Locally Significant Plant Species during Implementation of Programmatic Projects

Impact BI-2: The NRMP and implementation of programmatic projects under the NRMP would have a substantial adverse effect on special status bird species.

The following mitigation measure, as more fully described in the Final EIR, is hereby adopted in the form set forth in the Final EIR and the attached MMRP and will be implemented as provided therein.

M-BI-1a: Protection of Protected Species and Riparian and Wetland Habitat

Impact BI-3: The NRMP and implementation of programmatic projects under the NRMP would have a substantial adverse effect on other protected terrestrial wildlife species (other than bird species).

The following mitigation measure, as more fully described in the Final EIR, is hereby adopted in the form set forth in the Final EIR and the attached MMRP and will be implemented as provided therein.

M-BI-1a: Protection of Protected Species and Riparian and Wetland Habitat

Impact BI-4: The NRMP and implementation of programmatic projects under the NRMP would have a substantial adverse effect on protected aquatic species.

The following mitigation measure, as more fully described in the Final EIR, is hereby adopted in the form set forth in the Final EIR and the attached MMRP and will be implemented as provided therein.

M-BI-1a: Protection of Protected Species and Riparian and Wetland Habitat

Impact BI-5: Implementation of routine maintenance activities under the NRMP would result in a substantial adverse effect on special status species.

The following mitigation measure, as more fully described in the Final EIR, is hereby adopted in the form set forth in the Final EIR and the attached MMRP and will be implemented as provided therein.

M-BI-5: Protection of Special Status Species during Routine Maintenance

Impact BI-6: Implementation of the Sharp Park restoration activities under the NRMP would have a substantial adverse effect on special status species.

The following mitigation measures, as more fully described in the Final EIR, are hereby adopted in the form set forth in the Final EIR and the attached MMRP and will be implemented as provided therein.

M-BI-6a: Protection of Protected Species during Implementation of the Sharp Park Restoration Project

M-BI-6b: Protection of Protected Species during Maintenance of the Sharp Park Restoration Project

M-HY-1: Implementation of Stormwater Pollution Prevention Measures

The Commission finds that the foregoing mitigation measures are feasible and will mitigate the potential impacts of project construction on special status species to a less-than-significant level because the measures, which are adopted as conditions of project approval, provide adequate protection against any significant impact to special status species.

Sensitive Natural Communities

Impact BI-7: The NRMP and implementation of programmatic projects under the NRMP would have a substantial adverse effect on sensitive natural communities.

The following mitigation measure, as more fully described in the Final EIR, is hereby adopted in the form set forth in the Final EIR and the attached MMRP and will be implemented as provided therein.

M-BI-1a: Protection of Protected Species and Riparian and Wetland Habitat.

The Commission finds that the foregoing mitigation measure is feasible and will mitigate the potential impacts of project construction on sensitive natural communities to a less-than-significant level because the measure, which is adopted as a condition of project approval, provides adequate protection against any significant impact to sensitive natural communities.

Wetlands

Impact BI-10: The NRMP and implementation of programmatic projects under the NRMP would have a substantial adverse effect on wetlands.

The following mitigation measure, as more fully described in the Final EIR, is hereby adopted in the form set forth in the Final EIR and the attached MMRP and will be implemented as provided therein.

M-BI-1a: Protection of Protected Species and Riparian and Wetland Habitat

Impact BI-12: Implementation of the Sharp Park restoration activities under the NRMP would have a substantial adverse effect on wetlands.

The following mitigation measures, as more fully described in the Final EIR, are hereby adopted in the form set forth in the Final EIR and the attached MMRP and will be implemented as provided therein.

M-BI-12a: Protection of Wetlands during the Sharp Park Restoration Project

M-BI-12b: Laguna Salada Restoration Project Wetland Mitigation Plan

The Commission finds that the foregoing mitigation measures are feasible and will mitigate the potential impacts of project construction on wetlands to a less-than-significant level because the measures, which are adopted as conditions of project approval, provide adequate protection against any significant impact to wetlands.

Fish and Wildlife Movement, Migratory Corridors, and Nursery Sites

Impact BI-15: Implementation of Sharp Park restoration activities under the NRMP would have a substantial adverse effect on fish and wildlife movement, migratory corridors and nursery sites.

The following mitigation measures, as more fully described in the Final EIR, are hereby adopted in the form set forth in the Final EIR and the attached MMRP and will be implemented as provided therein.

M-BI-6a: Protection of Protected Species during Implementation of the Sharp Park Restoration Project

M-BI-6b: Protection of Protected Species during Maintenance of the Sharp Park Restoration Project

M-BI-12a: Protection of Wetlands during the Sharp Park Restoration Project

M-BI-12b: Laguna Salada Restoration Project Wetland Mitigation Plan

The Commission finds that the foregoing mitigation measures are feasible and will mitigate the potential impacts of project construction on fish and wildlife movement, migratory corridors, and nursery sites to a less-than-significant level because the measure, which is adopted as a condition of project approval, provides adequate protection against any significant impact to fish and wildlife.

d. Hydrology and Water Quality

Water Quality

Impact HY-1: Implementation of programmatic projects under the NRMP would violate water quality standards or otherwise degrade water quality.

The following mitigation measures, as more fully described in the Final EIR, are hereby adopted in the form set forth in the Final EIR and the attached MMRP and will be implemented as provided therein.

M-HY-1: Implementation of Stormwater Pollution Prevention Measures

M-HZ-13: Emergency Response Plan for Accidental Releases of Hazardous Materials

Impact HY-2: Implementation of routine maintenance activities under the NRMP would violate water quality standards or otherwise degrade water quality.

The following mitigation measure, as more fully described in the Final EIR, is hereby adopted in the form set forth in the Final EIR and the attached MMRP and will be implemented as provided therein.

M-HZ-14: General Emergency Response Plan for Routine Management Activities Using Gasoline- or Diesel-Powered Equipment

Impact HY-3: Implementation of the Sharp Park restoration under the NRMP would violate water quality standards or otherwise degrade water quality.

The following mitigation measures, as more fully described in the Final EIR, are hereby adopted in the form set forth in the Final EIR and the attached MMRP and will be implemented as provided therein.

M-BI-6a: Protection of Protected Species during Implementation of the Sharp Park Restoration Project

M-BI-12b: Laguna Salada Restoration Project Wetland Mitigation Plan

M-HY-1: Implementation of Stormwater Pollution Prevention Measures

M-HZ-13: Emergency Response Plan for Accidental Releases of Hazardous Materials

The Commission finds that the foregoing mitigation measures are feasible and will mitigate the potential impacts of project construction on water quality to a less-than-significant level because the measures, which are adopted as condition of project approval, provide adequate protection against any significant impact to water quality.

Erosion and Siltation

Impact HY-7: Implementation of the programmatic projects under the NRMP would result in substantial erosion or siltation.

The following mitigation measure, as more fully described in the Final EIR, is hereby adopted in the form set forth in the Final EIR and the attached MMRP and will be implemented as provided therein.

M-HY-1: Implementation of Stormwater Pollution Prevention Measures

Impact HY-9: Implementation of the Sharp Park restoration under the NRMP would not result in substantial erosion or siltation.

The following mitigation measure, as more fully described in the Final EIR, is hereby adopted in the form set forth in the Final EIR and the attached MMRP and will be implemented as provided therein.

M-HY-1: Implementation of Stormwater Pollution Prevention Measures

The Commission finds that the foregoing mitigation measure is feasible and will mitigate the potential impacts of project construction on erosion and siltation to a less-than-significant level because the measure, which is adopted as a condition of project approval, provides adequate protection from significant impacts related to erosion and siltation.

Stormwater Runoff

Impact HY-13: Implementation of the programmatic projects under the NRMP would affect stormwater runoff quantity or quality.

The following mitigation measure, as more fully described in the Final EIR, is hereby adopted in the form set forth in the Final EIR and the attached MMRP and will be implemented as provided therein.

M-HY-1: Implementation of Stormwater Pollution Prevention Measures

Impact HY-15: Implementation of the Sharp Park restoration under the NRMP would affect stormwater runoff quantity or quality.

The following mitigation measures, as more fully described in the Final EIR, are hereby adopted in the form set forth in the Final EIR and the attached MMRP and will be implemented as provided therein.

M-HY-1: Implementation of Stormwater Pollution Prevention Measures

M-HZ-13: Emergency Response Plan for Accidental Releases of Hazardous Materials

M-BI-12a: Protection of Wetlands during the Sharp Park Restoration Project

M-BI-12b: Laguna Salada Restoration Project Wetland Mitigation Plan

The Commission finds that the foregoing mitigation measures are feasible and will mitigate the potential impacts of project construction on erosion and siltation to a less-than-significant level because the measures, which are adopted as conditions of project approval, provide adequate protection from significant impacts related to stormwater runoff.

e. Hazards and Hazardous Materials

Hazardous Material Accidents

Impact HZ-13: Implementation of the programmatic projects under the NRMP would not create significant hazard to the public or the environment through accident conditions involving the release of hazardous materials into the environment.

The following mitigation measure, as more fully described in the Final EIR, is hereby adopted in the form set forth in the Final EIR and the attached MMRP and will be implemented as provided therein.

M-HZ-13: Emergency Response Plan for Accidental Releases of Hazardous Materials

Impact HZ-14: Implementation of the routine maintenance activities under the NRMP would not create significant hazard to the public or the environment through accident conditions involving the release of hazardous materials into the environment.

M-HZ-14: General Emergency Response Plan for Routine Management Activities Using Gasoline- or Diesel-Powered Equipment

Impact HZ-15: Implementation of the Sharp Park restoration under the NRMP would not create significant hazard to the public or the environment through accident conditions involving the release of hazardous materials into the environment.

The Commission finds that the foregoing mitigation measures are feasible and will mitigate the potential hazardous material accidents to a less-than-significant level because the measures, which are adopted as conditions of project approval, provide adequate protection from significant impacts due to hazardous material accidents.

The following mitigation measure, as more fully described in the Final EIR, is hereby adopted in the form set forth in the Final EIR and the attached MMRP and will be implemented as provided therein.

M-HZ-13: Emergency Response Plan for Accidental Releases of Hazardous Materials

f. Air Quality

Fugitive Dust

Impact AQ-1: Programmatic projects under the NRMP would result in substantial fugitive dust emissions.

The following mitigation measure, as more fully described in the Final EIR, is hereby adopted in the form set forth in the Final EIR and the attached MMRP and will be implemented as provided therein.

M-AQ-1: Fugitive Dust Reduction

Impact AQ-3: The Sharp Park restoration under the NRMP would result in substantial fugitive dust emissions.

The following mitigation measure, as more fully described in the Final EIR, is hereby adopted in the form set forth in the Final EIR and the attached MMRP and will be implemented as provided therein.

M-AQ-1: Fugitive Dust Reduction

The Commission finds that the foregoing mitigation measures are feasible and will mitigate the potential impacts of project construction on water quality to a less-than-significant level because the measures, which are adopted as conditions of project approval, provide adequate protection against any significant impacts to water quality.

IV. SIGNIFICANT IMPACTS THAT CANNOT BE AVOIDED OR REDUCED TO A LESS-THAN-SIGNIFICANT LEVEL

Based on substantial evidence in the whole record of these proceedings, the Commission finds that, where feasible, changes or alterations have been required, or incorporated into, the Project to reduce the significant environmental impacts as identified in the Final EIR. It is further found, however, that certain mitigation measures in the Final EIR, as described in this Section IV, or changes, have been required in, or incorporated into, the Project, pursuant to Public Resources Code Section 21002 and CEQA Guidelines Section 15091, which may lessen, but do not avoid (i.e., reduce to less-than-significant levels), the potentially significant environmental effects associated with implementation of the Project that are described below. Although all of the mitigation measures set forth in the Mitigation Monitoring and Reporting Plan (MMRP), attached as Exhibit 1, are adopted, for some of the impacts listed below, despite the implementation of feasible mitigation measures, the effects remain significant and unavoidable.

It is further found, as described in this Section IV below, based on the analysis contained within the Final EIR, other considerations in the record, and the significance criteria identified in the Final EIR, that because some aspects of the Project could cause potentially significant impacts for which feasible mitigation measures are not available to reduce the impact to a less-than-significant level, those impacts remain significant and unavoidable. It is also recognized that although mitigation measures are identified in the Final EIR that would reduce some significant impacts, certain measures, as described in this Section IV below, are uncertain or infeasible for reasons set forth below, and therefore those impacts remain significant and unavoidable or potentially significant and unavoidable.

Thus, the following significant impacts on the environment, as reflected in the Final EIR, are unavoidable. As more fully explained in Section VIII, below, under Public Resources Code Section 21081(a)(3) and (b), and CEQA Guidelines 15091(a)(3), 15092(b)(2)(B), and 15093, it is found and determined that legal, environmental, economic, social, technological and other benefits of the Project override any remaining significant adverse impacts of the Project for each of the significant and unavoidable impacts described below. This finding is supported by substantial evidence in the record of this proceeding.

a. Cultural and Paleontological Resources

Project-Level Impact (Sharp Park Restoration) - Architectural Resources

Impact CP-7: Implementing restoration activities to close Hole 12 of the Sharp Park Golf Course would result in a substantial adverse change in the significance of the golf course, a historic resource under CEQA.

The following mitigation measure, as more fully described in the Final EIR, is hereby adopted in the form set forth in the Final EIR, and the attached MMRP, and will be implemented as provided therein.

M-CP-7: Documentation of the Sharp Park Golf Course

Implementation of Mitigation Measure M-CP-7 would reduce the magnitude of this impact, but documentation alone would not reduce this impact to a less-than-significant level. No other feasible mitigation measures have been identified. Therefore, this impact remains significant and unavoidable with mitigation.

Impact CP-9: Implementation of the Sharp Park restoration activity that requires modification of the Sharp Park Golf Course to create upland habitat on the east side of the lagoon and shorten or narrow Holes 10 and 13 would be a substantial adverse change in the significance of the golf course, a historic resource under CEQA.

The following mitigation measure, as more fully described in the Final EIR, is hereby adopted in the form set forth in the Final EIR, and the attached MMRP, and will be implemented as provided therein.

M-CP-7: Documentation of the Sharp Park Golf Course

Implementation of Mitigation Measure M-CP-7 would reduce the magnitude of this impact, but documentation alone would not reduce this impact to a less-than-significant level. No other feasible mitigation measures have been identified. Therefore, this impact remains significant and unavoidable with mitigation.

Cumulative Impact

Impact CP-21: The proposed project, in combination with other planned and foreseeable future projects, would have a cumulatively considerable significant impact related to cultural and paleontological resources due to the identified significant on Sharp Park Golf Course, a historic resource under CEQA, due to modification of golf holes for restoration activities.

The following mitigation measure, as more fully described in the Final EIR, is hereby adopted in the form set forth in the Final EIR, and the attached MMRP, and will be implemented as provided therein.

M-RE-6: Restoration of the Sharp Park Golf Course to 18 Playable Holes

Although Mitigation Measure M-RE-6 would require the SFRPD to coordinate with a golf course consultant with expertise in historic golf course renovation to restore the playability of the Sharp Park Golf Course, while documenting and preserving the historic character-defining features of the course, the project's contribution to a cumulatively considerable impact to cultural resources due to the modification of golf holes would remain significant and unavoidable and no other feasible mitigation measures are available.

b. Recreation

Cumulative Impact

Impact RE-7: The proposed project, in combination with other planned and foreseeable future projects, would result in a cumulatively considerable significant impact related to recreation, due to a significant cumulative impact on recreation in dog play areas within Natural Areas due to increased use resulting from the reduction of dog play areas by the project and potentially by the National Park Service's (NPS) Dog Management Plan within the Golden Gate National Recreation Area (GGNRA). As set forth in the Final EIR, no feasible mitigation measures are available at this time to reduce this impact to less-than-significant. Therefore, this impact remains significant and unavoidable.

c. Biological Resources

Cumulative Impact

Impact BI-19: The proposed project, in combination with other planned and foreseeable future projects, would result in a cumulatively considerable significant impact related to biological resources within Natural Areas dog play areas due to increased use resulting from the reduction of dog play areas by the project and potentially by the NPS Dog Management Plan within the GGNRA. As set forth in the Final EIR, no feasible mitigation measures are available at this time to reduce this impact to less-than-significant. Therefore, this impact remains significant and unavoidable.

d. Air Quality

Criteria Air Pollutants - Programmatic Impact

Impact AQ-4: Programmatic projects under the NRMP such as trail construction, hillside stabilization, erosion control, and tree removal would contribute substantially to an existing or projected air quality violation and would result in a net increase of criteria pollutants for which the project region is in nonattainment under an applicable federal, state, or regional ambient air quality standard.

The following mitigation measure, as more fully described in the Final EIR, is hereby adopted in the form set forth in the Final EIR, and the attached MMRP, and will be implemented as provided therein.

M-AQ-4: Construction Contract Specification to Reduce Construction Vehicle Emissions

Mitigation Measure M-AQ-4 would reduce NOx emissions, but may not reduce emissions to below the Bay Area Air Quality Management District significance threshold due to uncertainty regarding the level of construction required for programmatic projects and the effectiveness of the mitigation measure to reduce criteria air pollutants. No other feasible mitigation measures are available, and therefore this impact remains significant and unavoidable.

Criteria Air Pollutants - Project-Level Impact (Sharp Park Restoration)

Impact AQ-6: The Sharp Park restoration under the NRMP would contribute substantially to an existing or projected air quality violation and would result in a net increase of criteria pollutants for which the project region is in nonattainment under an applicable federal, state, or regional ambient air quality standard.

The following mitigation measure, as more fully described in the Final EIR, is hereby adopted in the form set forth in the Final EIR, and the attached MMRP, and will be implemented as provided therein.

M-AQ-4: Construction Contract Specification to Reduce Construction Vehicle Emissions

Mitigation Measure M-AQ-4 would reduce NOx emissions, but such emissions would remain above the Bay Area Air Quality Management District daily significance threshold. No other feasible mitigation measures are available, and therefore this impact remains significant and unavoidable.

Impact AQ-10: Implementation of the proposed project in combination with past, present, and reasonably foreseeable projects in the vicinity would result in cumulatively considerable significant air quality impacts.

The following mitigation measures, as more fully described in the Final EIR, are hereby adopted in the form set forth in the Final EIR, and the attached MMRP, and will be implemented as provided therein.

M-AQ-4: Construction Contract Specification to Reduce Construction Vehicle Emissions

M-AQ-10: Cumulative Health Risk Analysis for Programmatic Projects

Mitigation Measure M-AQ-4 would reduce NOx emissions, but may not reduce emissions to below the Bay Area Air Quality Management District significance threshold. Additionally, due to uncertainty regarding the boundaries of individual construction projects for programmatic activities and the concomitant uncertainty that Mitigation Measure M-AQ-10 would be effective in reducing cumulative health risk impacts, this impact remains significant and unavoidable. No other feasible mitigation measures are available.

V. EVALUATION OF PROJECT ALTERNATIVES

This Section describes the reasons for approving the Project and the reasons for rejecting the alternatives as infeasible. CEQA requires that an EIR evaluate a reasonable range of alternatives to the proposed project or the project location that substantially reduce or avoid significant impacts of the proposed project. CEQA requires that every EIR also evaluate a "No Project" alternative. Alternatives provide the decision maker with a basis of comparison to the proposed Project in terms of their significant impacts and their ability to meet project objectives. This comparative analysis is used to consider reasonable, potentially feasible options for minimizing environmental consequences of the proposed Project.

The Commission rejects the Alternatives set forth in the Final EIR and listed below based upon substantial evidence in the record, including evidence of economic, legal, social, technological, and other considerations described in this Section, in addition to those described in Section VI below, which are hereby incorporated by reference, that make these alternatives infeasible. In making these determinations, the Commission is aware that CEQA defines "feasibility" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." (CEQA Guidelines § 15364.) Under CEQA case law, the concept of "feasibility" encompasses (i) the question of whether a particular alternative promotes the underlying goals and objectives of a project; and (ii) the question of whether an alternative is "desirable" from a policy standpoint to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, legal, and technological factors.

Alternatives Analyzed in the FEIR

No Project Alternative

Under the No Project Alternative, the project sites would remain in their existing conditions. The SFRPD would continue with management activities authorized under the 1995 management plan, which includes activities similar to those outlined for the proposed project. However, the No Project Alternative differs from the proposed project in that programmatic projects would not occur. Habitat restoration and invasive tree and vegetation removal would likely be smaller in scale. Fewer trails would be closed and no new trails created. The No Project Alternative would not close or reduce the size of dog play areas. Over time, this alternative likely would result in Natural Areas with characteristics largely similar to those under the proposed project; however, restoration and enhancement actions would be smaller in scale under the No Project Alternative. Activities at Laguna Salada in the Sharp Park Natural Area would be limited to removing accumulated sediment and tules by hand or other low-impact means. Laguna Salada would not be dredged.

The Commission rejects the No Project Alternative because it would not meet the project objectives because it would not implement a comprehensive program for managing the Natural Areas to maintain and enhance biodiversity and provide appropriate recreation opportunities. Moreover, the No Project Alternative would not restore Laguna Salada, as stated in the project objectives. Compared to the proposed project, the No Project Alternative would involve moderately less invasive tree and vegetation removal and closure of fewer trails. The No Project Alternative would not result in new trails because routine maintenance would be limited.

Maximum Restoration Alternative

The Maximum Restoration Alternative seeks to restore native habitat and convert nonnative habitat to native habitat wherever possible throughout the Natural Areas, including all management areas. The SFRPD would restore native habitat and convert nonnative habitat to native habitat wherever possible throughout the Natural Areas, including all management areas. The Maximum Restoration Alternative prioritizes activities related to endangered species protection and recovery and maximum enhancement of biodiversity. Compared to the proposed project, this alternative emphasizes the restoration of native habitat over recreational uses and nonnative habitat. As this alternative would prioritize habitat restoration over recreation, this alternative would close additional trails, and no new trails would be created. The Maximum Restoration Alternative would further reduce the amount of dog play area acreage, as compared to the proposed project; this alternative would not add any new dog play areas to the Natural Areas.

The Maximum Restoration Alternative includes more extensive habitat restoration at the Laguna Salada wetland complex than the proposed project. Similar to the proposed project, this alternative would extend restoration outside the Natural Area boundary but also would restore up to an additional five acres of habitat for the California red-legged frog and San Francisco garter snake.

The Commission rejects the Maximum Restoration Alternative because it would result in additional restrictions on public use and access of the Natural Areas; therefore, the Maximum Restoration Alternative does not meet the objective related to recreation, as the Maximum Restoration Alternative would provide additional restrictions on public use and access of the Natural Areas.

Maximum Recreation Alternative

The Maximum Recreation Alternative seeks to restore and improve recreational access to the Natural Areas wherever it does not interfere with the continued existence of native species and federally or state-listed sensitive species. Over time, less habitat identified by the NRMP would be restored, while all or most of the recreation-related projects, such as trail network improvement, would be implemented. As such, the Maximum Recreation Alternative includes substantially less invasive tree and vegetation removal, thereby resulting in a long-term increase in the presence of nonnative species and a reduction in native habitat. Tree and vegetation removal would be limited to that necessary to meet the Natural Areas Program tree maintenance health and safety goals and those trees required to be removed for trail creation or other projects providing additional recreation facilities (picnic areas and playgrounds).

The Maximum Recreation Alternative would close fewer informal and social trails and includes moderately more trail creation in MA-2 and MA-3 areas than the proposed Project and would also allow mountain biking and horseback riding where those uses would not conflict with special status species and their habitats. The Maximum Recreation Alternative would not close or reduce dog play areas, but no new dog play areas would be created in the Natural Areas.

The Maximum Recreation Alternative includes restoration of the wetland complex at Laguna Salada. However, restoration would differ from the proposed project in that it would be limited to the geographic limits of the Natural Area; restoration would not encroach on the golf course operations, except as required for temporary construction. Compared to the proposed project, this alternative would result in less edge and upland habitat for the San Francisco garter snake.

The Commission rejects the Maximum Recreation Alternative because it would result in an overall decrease in habitat restoration and management of the Natural Area's resources as compared to the proposed Project. The Maximum Recreation Alternative would only include restoration/enhancement of Laguna Salada within the geographic limits of that Natural Area, rather than both restoring the Laguna Salada and increasing habitat access by adding habitat corridors, as with the proposed Project. This would provide more limited benefits to special status species, as compared to the proposed Project.

Maintenance Alternative

The Maintenance Alternative seeks to maintain the current distribution of native and nonnative habitat and species throughout the Natural Areas. Under this alternative, there would be no conversion of nonnative habitat to native habitat; other features of the Natural Areas also would be retained.

Under the Maintenance Alternative the general components of the SNRAMP, the SFRPD would implement best management practices (BMPs), adaptive management, integrated pest management (IPM), and the monitoring plan, which are detailed in Chapter III of the DEIR. Under this alternative, the SFRPD would maintain the current distribution of native and nonnative habitat and species throughout the Natural Areas. There would be no conversion of nonnative habitat to native habitat, and other features of the Natural Areas also would be retained. There would be less habitat restoration and less invasive tree and vegetation removal compared to the proposed project. Over time, this alternative likely would result in Natural Areas with habitat and recreation characteristics similar to those currently present.

The Maintenance Alternative would preserve the current trail system; it would not close trails or

create new trails. The Maintenance Alternative would not close or reduce dog play areas; however, no new dog play areas would be created in the Natural Areas.

Activities at Laguna Salada in the Sharp Park Natural Area would be limited to removing accumulated sediment and tules by hand or other low-impact means during the dry season. Laguna Salada would not be dredged, and during the rainy season Natural Areas Program staff would continue monitoring for the California red-legged frog, in compliance with the state and federal Endangered Species Acts. The Maintenance Alternative was identified as the environmentally superior alternative in the FEIR.

The Commission rejects the Maintenance Alternative because it would not result in restoration projects that address the issues that may adversely affect the ecosystem functions and biological diversity in the Natural Areas. The Maintenance Alternative meets some, but not all of the project objectives. Specifically, the Maintenance Alternative does not meet the objectives related to enhancement of the native ecosystem and biodiversity and restoration of the Laguna Salada wetland complex. The Maintenance Alternative would not result in restoration projects that address the issues that may adversely affect the ecosystem functions and biological diversity in the Natural Areas. Furthermore, the Maintenance Alternative would not provide additional recreation opportunities compatible with San Francisco's natural resources.

Alternatives Considered, Rejected, and the Reasons for Rejection

During the scoping process, public comment was received proposing a Sharp Park restoration alternative that included a model of natural flood control, outdoor recreation, environmental education, and endangered species recovery. This alternative would involve full restoration of the entire Sharp Park property, including the elimination of the golf course. This proposal was rejected as an individual alternative because it is not compatible with the 18-hole layout of the historic golf course. This alternative would, through the elimination of the Sharp Park Golf Course, result in greater significant and unavoidable impacts to cultural and recreational resources and therefore is not required to be analyzed under CEQA.

In addition, as part of the Sharp Park Conceptual Restoration Alternatives Report, the SFRPD proposed restoration alternatives that would be compatible with either a nine-hole layout at the Sharp Park Golf Course or with removal of the golf course entirely. These alternatives have been rejected because they are not compatible with the existing 18-hole layout of the historic golf course.

VI. STATEMENT OF OVERRIDING CONSIDERATIONS

Pursuant to Public Resources Section 21081 and CEQA Guidelines Section 15093, is the Commission hereby finds, after consideration of the Final EIR and the evidence in the record, that each of the specific overriding economic, legal, social, technological and other benefits of the NRMP as set forth below independently and collectively outweighs the significant and unavoidable impacts and is an overriding consideration warranting approval of the NRMP. Any one of the reasons for approval cited below is sufficient to justify approval of the NRMP. Thus, even if a court were to conclude that not every reason is supported by substantial evidence, this determination is that each individual reason is sufficient. The substantial evidence supporting the various benefits can be found in the Final EIR and the preceding findings, which are incorporated by reference into this Section, and in the documents found in the administrative record, as described in Section I.

The Commission finds that, notwithstanding the imposition of all feasible mitigation measures, significant impacts related to Cultural and Paleontological Resources, Biological Resources, Air Quality, and Recreation will remain significant and unavoidable and in accordance with CEQA Guidelines Section 15092(b)(2)(B), such remaining impacts are acceptable due to the overriding considerations described below. In accordance with CEQA guidelines Section 15093, CEQA Section 21081(b), and Chapter 31 of the San Francisco Administrative Code, the Commission hereby finds that each of the specific economic, legal, social, technological, and other considerations, and the benefits of the Project separately and independently outweigh these significant, adverse impacts. The remaining significant adverse impacts identified are acceptable in light of each of these overriding considerations.

The Management Plan would:

- enhance over 1,000 acres of natural open spaces under the jurisdiction of San Francisco Recreation and Park Department through recommended management actions specific to each of the 32 Natural Areas;
- identify and prioritize monitoring of natural resources to support an adaptive management approach to appropriately prepare and react to any foreseeable hazards to public safety;
- provide guidelines for education, research, and stewardship programs to promote city residents of all ages to connect to the natural world despite living in an urbanized city;
- promote the functioning of San Francisco's native ecosystem through maintenance and enhancement of native biodiversity to ensure San Francisco is resilient and adaptable towards climate change;
- improve trail infrastructure and access to Natural Areas to encourage City residents to utilize their parks system for physical exercise and relaxation;
- ensure the sustained and increased populations of the endangered San Francisco garter snake and the threatened California red-legged frog, both protected under the Endangered Species Act, through the Laguna Salada restoration at Sharp Park;
- protect and enhance beautiful natural and sustainable landscapes of San Francisco for future generations to enjoy.

Having considered the information included above as well as information in these Findings and elsewhere in the administrative record, the Commission finds, determines, and concludes that the project benefits of the Management Plan Project outweigh the unavoidable adverse environmental effects, and that the adverse environmental effects are therefore acceptable.

Attachment 2: Mitigation Monitoring and Reporting Program

ATTACHMENT 2: MITIGATION MONITORING AND REPORTING PROGRAM (Includes Text for Adopted Mitigation and Improvement Measures)				
MEASURES ADOPTED AS CONDITIONS OF APPROVAL	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
Cultural and Paleontological Resources				
Mitigation Measure M-CP-1: Consultation with the San Francisco Planning Department: SFRPD would coordinate with the San Francisco Planning Department's Historic Preservation Planners and would submit plans before constructing stabilizing and erosion control measures that require installation of structures, such as gabions, near potentially eligible resource. Should it be determined that a Historic Resource Evaluation is required, that evaluation shall be completed by a qualified professional landscape architectural historian. The Planning Department would assist in determining if any proposed construction or other activities would impact identified historic resources under CEQA on a site-by-site basis; if such impacts may occur, the project would be required to be redesigned to avoid significant impacts to historic architectural resources. The Planning Department would also assess potential impacts on any historic landscapes that are present.	San Francisco Recreation and Parks Department (SFRPD)	Before any construction of structures near potentially eligible resource— • Coordination with SF Planning Department • Submission of plans • Possible redesign of project if necessary	San Francisco Recreation and Parks Department (SFRPD)	Ongoing
Mitigation Measure M-CP-7: Documentation of the Sharp Park Golf Course The SFRPD would retain a consultant with expertise in historic golf course renovation and with specific expertise, if possible, in golf courses designed by Alister McKenzie to document and preserve the historic character-defining features of the Sharp Park Golf Course before wetland restoration activities take place. The National Park Service has published guidance for preserving cultural landscapes in Preservation Brief 36: Protecting Cultural Landscapes, Planning, Treatment, and Management of Historic Landscapes and in the more complete Secretary of the Interior's Standards for the Treatment of Historic Properties Guidelines for the Treatment of Cultural Landscapes. The appropriate level of documentation would be selected by a qualified professional landscape architectural historian who meets the standards for history, architectural history, or architecture (as appropriate) set forth by the Secretary of the Interior's Professional Qualification Standards, (36 CFR, Part 61).	SFRPD	Pre-activity— • Retain a consultant with appropriate expertise	SFRPD	Considered complete when qualified consultant has been retained / Pre-activity

ATTACHMENT 2: MITIGATION MONITORING AND REPORTING PROGRAM (Includes Text for Adopted Mitigation and Improvement Measures)				
MEASURES ADOPTED AS CONDITIONS OF APPROVAL	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
M-CP-7: The documentation would consist of the following: • Full sets of measured drawings depicting existing or historic conditions of the Sharp Park Golf Course; • Digital photographs of the Sharp Park Golf Course; • A written history and description of the Sharp Park Golf Course and its alterations. The professional landscape architectural historian would prepare the documentation and submit it for review and approval by a San Francisco Planning Department Preservation Specialist. The documentation would be disseminated to the San Francisco Library History Room and the SFRPD Headquarters.	SFRPD	Prior to wetland restoration at Sharp Park—Documentation with drawings, photographs, written history and description.	SFRPD with help of qualified archaeological consultant	Considered complete when SF Planning approves documentation / Pre-activity
Mitigation Measure M-CP-10: Archaeological Monitoring Program for Programmatic Projects in Natural Areas with High Archaeological Sensitivity, Routine Maintenance Activities at Tank Hill and Lake Merced, and the Sharp Park Restoration Project The following archaeological monitoring program mitigation measure is required in order to avoid any potential adverse effect on accidentally discovered buried or submerged archaeological or historical resources as defined in CEQA Guidelines Section 15064.5(a)(c), as a result of NRMP programmatic projects in Natural Areas of high archaeological sensitivity and routine maintenance activities at Tank Hill and Lake Merced. In addition, based on a reasonable potential that archaeological resources may be present within the C-APE of the Sharp Park restoration project, the following measures shall be undertaken to avoid any potentially significant adverse effect from the Sharp Park restoration on archaeological resources.	SFRPD	Before implementation of plan and Sharp Park restoration project— • Create Archaeological Monitoring Plan	SFRPD with help of qualified archaeological consultant	Considered complete upon ERO approval of the Draft Final Archaeological Resources Report (FARR) and distribution of copies.

ATTACHMENT 2: MITIGATION MONITORING AND REPORTING PROGRAM (Includes Text for Adopted Mitigation and Improvement Measures)				
MEASURES ADOPTED AS CONDITIONS OF APPROVAL	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
M-CP-10: Before implementation of NRMP and the Sharp Park restoration project, the SFRPD shall retain a qualified archaeological consultant from the San Francisco Planning Department's pool of qualified archaeological consultants, as provided by the Department's archaeologist. The archaeological consultant will prepare one or multiple AMPs that each address one of the following impacts on archaeological resources: 1) programmatic projects in Natural Areas with high archaeological sensitivity, 2) routine maintenance activities in Tank Hill and Lake Merced Natural Areas, and 3) the Sharp Park restoration project. All plans and reports prepared by the consultant shall be submitted first and directly to the Environmental Review Officer (ERO) for review and comment and shall be considered draft reports subject to revision until final approval by the ERO. Any AMP and/or data recovery programs required by this measure could suspend NRMP activities covered under this mitigation measure for up to four weeks. At the direction of the ERO, the suspension of construction could be extended beyond four weeks only if such a suspension were the only feasible means to reduce impacts to a less than significant level on a significant archaeological resource, as defined in CEQA Guidelines Sect. 15064.5 (a)(c).	SFRPD	Before implementation of NRMP and Sharp Park restoration project— • retain a qualified archaeological consultant • Preparation of one or multiple AMPs • Submission of plans and reports to ERO for review and comment	SFRPD, archaeological consultant	Considered complete upon submission of plans and reports to the ERO for review and comment; final approval by the ERO.
M-CP-10: Archaeological monitoring program. The AMP will minimally include the following provisions: The archaeological consultant, SFRPD, and ERO will meet and consult on the scope of each AMP reasonably before implementation of the NRMP. The ERO, in consultation with the Project Archaeologist, will determine what programmatic projects in which high-sensitivity Natural Areas and what routine maintenance activities in Tank Hill and Lake Merced Natural Areas shall be archaeologically monitored.	SFRPD, Archaeological consultant, ERO	Before implementation of NRMP and Sharp Park restoration project— • SFRPD, ERO and archaeological consultant joint meeting to design an archaeological monitoring plan.	SFRPD, archaeological consultant	Considered complete upon agreement of programmatic projects and routine maintenance activities in Tank Hill, Lake Merced Natural Areas.

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M-CP-10: Additionally, the ERO and Project Archaeologist will determine which activities and portions of the Sharp Park restoration project will be archeologically monitored. In most cases, any ground-disturbing activities, such as demolition, excavation, grading, utilities installation, site remediation, etc. shall require archaeological monitoring because of the potential risk these activities pose to archaeological resources and to their depositional context.	SFRPD	Before implementation of NRMP and Sharp Park restoration project— • ERO and Project Archaeologist to determine which activities and portions of the Sharp Park restoration project will be archaeologically monitored.	SFRPD, archaeological consultant	Considered complete upon agreement among SFRPD, ERO and Project Archaeologist of which activities or portions of Sharp Park project will be archaeologically monitored / Pre-activity
M-CP-10: The archaeological consultant will advise all project contractors and Natural Areas Program staff to be on the alert for evidence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of discovery of an apparent archaeological resource. A standard EP ALERT Sheet will be issued to participating project contractors and Natural Areas Program staff. Additionally, Natural Areas Program staff will advise all project volunteers of the potential for archaeological resources;	SFRPD	Before implementation of NRMP and Sharp Park restoration project— • Archaeological consultant to advise all project contractors and NAP staff • SFRPD will issue EP ALERT Sheet. • NAP staff to advice all project volunteers.	SFRPD, archaeological consultant	Pre-activity
M-CP-10: The archaeological monitors will be on the project site according to a schedule agreed on by the archaeological consultant and the ERO until the ERO has, in consultation with the archaeological consultant, determined that project construction would have no effects on significant archaeological deposits; The archaeological monitor will record and be authorized to collect soil samples and artifactual/ecofactual material warranted for analysis.	SFRPD	As-needed on a project basis— • Archaeological monitors on project site until ERO determines that project construction would have no effect on significant archaeological deposits.	SFRPD, archaeological consultant	Considered complete when ERO, in consultation with archaeological consultant, determines that project construction would have no effects on significant archaeological deposits / Ongoing

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M-CP-10: If an intact archaeological deposit is encountered, all ground-disturbing activities in the vicinity of the deposit should cease. The archaeological monitor will be empowered to temporarily redirect project activities and heavy equipment until the deposit is evaluated. The archaeological consultant will immediately notify the ERO of the encountered archaeological deposit. After making a reasonable effort to assess the identity, integrity, and significance of the encountered archaeological deposit, the archaeological consultant will present the findings to the ERO.	Archaeological consultant, ERO	As-needed on a project basis if an intact archaeological deposit is encountered	SFRPD, Archaeological consultant	Considered complete when consultant notifies and presents findings to ERO / Ongoing, as-needed basis
M-CP-10: If the ERO, in consultation with the archaeological consultant, determines that a significant archaeological resource is present and that it could be adversely affected by the project, at the discretion of the SFRPD, the situation shall be resolved by one of the following actions: • The project shall be redesigned so as to avoid any adverse effect on the significant archaeological resource, or • An archaeological data recovery program shall be implemented, unless the ERO were to determine that the archaeological resource is of greater interpretive value than research significance and that interpretive use of the resource were feasible.	SFRPD, Archaeological consultant, ERO	If a significant archaeological resource is present	SFRPD, Archaeological consultant	Considered complete when project is either redesigned or archaeological data recovery program is implemented / Ongoing, as-needed basis.
M-CP-10: If the ERO requires an archaeological data recovery program to mitigate for adverse effects on the significant archaeological resource, it shall be conducted in accordance with an archaeological data recovery plan (ADRP). The project archaeological consultant, SFRPD, and ERO shall meet and consult on the scope of the ADRP. The archaeological consultant shall prepare a draft ADRP and submit it to the ERO for review and approval. The ADRP shall identify how the proposed data recovery program would preserve the significant information the archaeological resource is expected to contain; that is, the ADRP would identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archaeological resources if nondestructive methods were practical. The ADRP shall include the following elements: • Field Methods and Procedures. Descriptions of proposed field strategies, procedures, and operations;	SFRPD, Archaeological consultant, ERO	If ERO requires an archaeological data recovery program to mitigate for adverse effects on the significant archaeological resource	SFRPD, Archaeological consultant	Considered complete when ADRP is drafted / Ongoing, as-needed basis.

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• Cataloguing and Laboratory Analysis. Description of selected cataloguing system and artifact analysis procedures; • Discard and Deaccession Policy. Description of and rationale for field and post-field discard and deaccession policies; • Interpretive Program. Consideration of an on-site/off-site public interpretive program during the course of the archaeological data recovery program. • Security Measures. Recommended security measures to protect the archaeological resource from vandalism, looting, and unintentional damage; • Final Report. Description of proposed report format and distribution of results; and • Curation. Description of the procedures and recommendations for curating any recovered data having potential research value, identifying appropriate curation facilities, and summarizing the accession policies of the curation facilities.				
M-CP-10: Final Archaeological Resources Report. The archaeological consultant shall submit a Draft Final Archaeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archaeological resource and describes the archaeological and historical research methods used in the archaeological monitoring or data recovery program. Information that may put at risk any archaeological resource shall be provided in a separate removable insert within the draft final report. Copies of the Draft FARR shall be sent to the ERO for review and approval. Once the FARR is approved, copies shall be distributed as follows: • One copy to the NWIC with a copy of the transmittal sent to the ERO; and • Three copies to the EP division of the San Francisco Planning Department; EP shall also receive one unlocked, searchable PDF copy of the FARR on a CD or DVD, along with copies of any formal site recordation forms (CA DPR 523 series) and documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest or interpretive value, the ERO may require a different final report content, format, and distribution than that presented above.	SFRPD, Archaeological consultant, ERO	If ERO requires an archaeological data recovery program to mitigate for adverse effects on the significant archaeological resource	SFRPD, Archaeological consultant	Considered complete after draft FARR is reviewed and approved by ERO / Ongoing, as-needed basis

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Mitigation Measure M-CP-11: Accidental Discovery Prior to any ground disturbing activity resulting from implementation of the NRMP, including Natural Areas of moderate and low archaeological sensitivity, a copy of EP's standard archaeological alert sheet will be issued to project staff. The project sponsor shall distribute the Planning Department archaeological resource "ALERT" sheet to the involved Natural Areas Program staff and volunteers, project prime contractor, any project subcontractors (including, but not limited to, demolition, excavation, grading, etc. firms), and any utilities firm involved in ground-disturbing activities. Prior to any ground-disturbing activities being undertaken, each contractor (or Natural Areas Program staff for projects without contractors) is responsible for ensuring that the "ALERT" sheet is circulated to all field personnel, including machine operators, field crew, supervisory personnel, etc. The project sponsor shall provide the ERO with a signed affidavit from the responsible parties (prime contractor, subcontractor(s), and utilities firm) confirming that all field personnel have received copies of the "ALERT" sheet.	SFRPD	Prior to any ground disturbing activity from implementation of NRMP	SFRPD	Complete when "ALERT" sheet is circulated and SFRPD provides the ERO with a signed affidavit from responsible parties / Ongoing
M-CP-11: Should any indication of an archaeological resource be encountered during any soils disturbing activity of the project, the project Head Foreman and/or SFRPD shall immediately notify the ERO and immediately suspend any soils disturbing activities in the vicinity of the discovery until the ERO has determined what additional measures should be undertaken.	SFRPD, ERO	If any indication of any archaeological resource is encountered	SFRPD	Considered complete when SFRPD notifies ERO and suspends any soils disturbing activities / Ongoing, as-needed basis
M-CP-11: If the ERO determines that an archaeological resource may be present within the project site, SFRPD shall retain the services of an archaeological consultant from the pool of qualified archaeological consultants maintained by the Planning Department archaeologist. The archaeological consultant shall advise the ERO as to whether the discovery is an archaeological resource, retains sufficient integrity, and is of potential scientific, historical, or cultural significance. If an archaeological resource is present, the archaeological consultant shall identify and evaluate the archaeological resource. The archaeological consultant shall make a recommendation as to what action, if any, is warranted. Based on this information, the ERO may require, if warranted, specific additional measures to be implemented by SFRPD. Measures might include: • Preservation in situ of the archaeological resource; • An AMP; or • An archaeological testing program.	SFRPD, ERO	If ERO determines that an archaeological resource may be present within project site— • Retain services of archaeological consultant • Consultant to advise ERO of significance of archaeological resource	SFRPD, Archaeological consultant	Considered complete when archaeological consultant recommends an action, if any. If so, SFRPD to implement specific additional measures required by ERO / Ongoing, as-needed basis

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M-CP-11: If an AMP or archaeological testing program is required, it shall be consistent with the EP division guidelines for such programs and as described above under M-CP-10. The ERO may also require that SFRPD immediately implement a site security program if the archaeological resource is at risk from vandalism, looting, or other damaging actions.	SFRPD, Archaeological consultant, ERO	If an AMP or archaeological testing program is required	SFRPD	Considered complete when AMP or archaeological testing program is consistent with EP division guidelines (M-CP-10), and if required, when SFRPD implements a site security program / Ongoing, as-needed basis
M-CP-11: The project archaeological consultant shall submit a FARR to the ERO that evaluates the historical significance of any discovered archaeological resource and describes the archaeological and historical research methods employed in the AMP and/or ADRP. Information that may put at risk any archaeological resource shall be provided in a separate removable insert within the final report. Copies of the Draft FARR shall be sent to the ERO for review and approval. Once approved by the ERO, copies of the FARR and associated items (i.e. site record forms) shall be distributed in the same numbers and to the same recipients outlined in M-CP-10.	Archaeological consultant, ERO	If an AMP or archaeological testing program is required	SFRPD	Considered complete when FARR is review and approved by ERO / Ongoing, as-needed basis.
Mitigation Measure M-CP-12: Annual Archaeological Sensitivity Training for Natural Areas Program Staff Involved with Routine Maintenance Activities in all Natural Areas SFRPD staff working within the Natural Areas will be trained by a qualified archaeologist regarding the potential for archaeological resources within the Natural Areas and how to identify such resources. The training will also include a review of penalties for looting and disturbance of these resources. At a minimum, the training will include the following: • Assigned archaeological sensitivity level of each Natural Area; • A discussion of the potential to encounter archaeological resources; • Instructions for how to identify archaeological resources; • Instructions for reporting observed looting, disturbances of known archaeological resources, or the presence of a previously unidentified archaeological site; • An overview of the AMP for routine maintenance activities and accidental discovery procedures in the Natural Areas (see M-CP-10 and M-CP-11, respectively); and • An overview of M-CP-18, Treatment of Human Remains and Associated or Unassociated Funerary Objects.	SFRPD, Archaeological consultant	Annual training for Natural Areas Program staff	SFRPD, Archaeological consultant	Considered compliant after every annual training of Natural Areas staff / Ongoing on an annual basis

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M-CP-12: It shall be the responsibility of SFRPD Natural Areas Program staff, at the beginning of any management activities involving persons outside of the Natural Areas Program, to educate volunteers or other personnel on the potential to encounter archeological resources and instructions for reporting the presence of potential resources to SFRPD Natural Areas Program staff.	SFRPD	At the beginning of any management activities involving persons outside of the Natural Areas Program—Ongoing education of volunteers/other personnel regarding archaeological resources in Natural Areas	SFRPD	Considered compliant after any archaeological resources volunteer/other personnel training by Natural Areas staff / Ongoing, as-needed basis
Mitigation Measure M-CP-15: Coordination with EP Regarding Paleontological Resources Prior to Implementation of Programmatic Projects To mitigate the potential for the NRMP to affect paleontological resources, this mitigation measure will apply to programmatic projects. The SFRPD shall coordinate with EP prior to conducting any programmatic projects that would result in ground disturbance. In such instances, EP shall review the proposed activities to determine if ground-disturbing activities could occur at or near bedrock or other geologic features of CEQA significance. If such features exist and could be affected by project activities, a training program will be conducted and an alert sheet will be disseminated to all field personnel.	SFRPD, EP	Prior to conducting any programmatic projects that would result in ground disturbance.	SFRPD	Considered complete when EP reviews proposed activities; if significant features exist or could be affected, SFRPD to conduct training program and to disseminate alert sheet to field personnel / Ongoing, as-needed basis
M-CP-15: Any paleontological training will be conducted by a qualified paleontologist and will discuss the potential for such resources to exist in the Natural Area(s) and how to identify such resources. The training will also include a review of penalties for looting and disturbance of these resources. Alert sheets will be issued for all such projects and will include the following: • A discussion of the potential to encounter paleontological resources; • Instructions for reporting observed looting of a paleontological resource; and • Instructions that if a paleontological deposit were encountered within a project area, all ground-disturbing activities in the vicinity of the deposit shall cease and the ERO shall be notified immediately.	SFRPD, Paleontologist consultant	If significant paleontological resources may be affected by proposed activities— • Retain a qualified paleontologist consultant • Consultant to conduct training • Alert sheets will be issued. • Alert ERO if paleontological deposit is encountered.	SFRPD, Paleontologist consultant	Considered complete when training is conducted and if any identified resources are reported to ERO / Ongoing, as-needed basis

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M-CP-15: When unanticipated paleontological resources are encountered during programmatic project activities, all project activities shall stop, and a professional paleontologist shall be hired to assess the find and its significance. The findings shall be presented to the ERO who would decide the additional steps to be taken before work in the vicinity of the deposit is authorized to continue.	SFRPD, Paleontologist consultant	When unanticipated paleontological resources are encountered during programmatic project activities— • Retain professional paleontologist to assess the find and its significance • Present findings to ERO and follow additional steps.	SFRPD, Paleontologist consultant	Considered complete when findings are presented to ERO and if necessary and required by ERO, when any additional steps are taken / Ongoing, as-needed basis.
Mitigation Measure M-CP-16: Avoidance of Surface Bedrock in Routine Maintenance Activities To mitigate the potential for the NRMP to affect paleontological resources the following mitigation measure will apply to routine maintenance activities. Natural Areas Program staff and volunteers will avoid ground-disturbing activities in areas where surface bedrock exists. If routine maintenance activities cannot avoid bedrock, SFRPD will implement M-CP-15, discussed above	SFRPD	When working near potentially affected paleontological resources—Avoid ground-disturbing activities where surface bedrock exists.	SFRPD	Considered compliant when SFRPD staff/volunteers avoid ground-disturbing activities where surface bedrock exists; Also considered compliant if SFRPD implements M-CP-15 if bedrock cannot be avoided / Ongoing basis

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MEASURES ADOPTED AS CONDITIONS OF APPROVAL	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
Mitigation Measure M-CP-17: Paleontological Training Program and Alert Sheet for the Sharp Park Restoration Project To mitigate the potential for the Sharp Park restoration project to affect paleontological resources, the SFRPD shall arrange for a paleontological training by a qualified paleontologist regarding the potential for such resources to exist in the restoration area and how to identify such resources. The training shall also include a review of penalties for looting and disturbance of these resources. An alert sheet shall be issued and will include the following: • A discussion of the potential to encounter paleontological resources; • Instructions for reporting observed looting of a paleontological resource; and • Instruct that if a paleontological deposit were encountered within a project area, all soil-disturbing activities in the vicinity of the deposit shall cease and the ERO would be notified immediately. If an unanticipated paleontological resource is encountered during project activities, all project activities shall stop, and a professional paleontologist shall be hired to assess the find and its significance. The findings shall be presented to the ERO who would decide the additional steps to be taken before work in the vicinity of the deposit was authorized to continue.	SFRPD, Paleontologist consultant, ERO	If Sharp Park restoration project has potential to affect paleontological resources— • Retain a qualified paleontologist • Arrange a paleontological training • If unanticipated paleontological resource is found, paleontologist consultant to present findings to ERO • Follow additional steps required by ERO as needed.	SFRPD, Paleontologist consultant	Considered complete if paleontologist is retained, trains staff, and reports any found resources to ERO, and any required additional steps are executed. / Ongoing, as-needed basis
Mitigation Measure M-CP-18: Human Remains, Associated or Unassociated Funerary Objects. The treatment of human remains and of associated or unassociated funerary objects discovered during any ground-disturbing activity shall comply with applicable State and Federal Laws, including immediate notification of the Coroner of the City and County of San Francisco (or San Mateo County Coroner if found at Sharp Park) and in the event of the Coroner's determination that the human remains are Native American remains, notification of the NAHC who shall appoint a Most Likely Descendant (Pub. Res. Code Sec. 5097.98). The archaeological consultant, SFRPD, and Most Likely Descendant shall make all reasonable efforts to develop an agreement for the treatment of, with appropriate dignity, human remains and associated or unassociated funerary objects (CEQA Guidelines. Sec. 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, curation, possession, and final disposition of the human remains and associated or unassociated funerary objects.	SFRPD, Archaeological consultant	If any human remains or funerary objects are discovered during any ground-breaking activity— • Comply with applicable State and Federal Laws	SFRPD, Archaeological consultant	Ongoing, as-needed basis

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Recreation				
Mitigation Measure M-RE-6: Restoration of the Sharp Park Golf Course to 18 Playable Holes The SFRPD would coordinate with a golf course consultant and would restore the playability of the Sharp Park Golf Course, which would involve replacing Hole 12 either on the west (Option 1) or east (Option 2) side of Highway 1. Replacing the hole on the west side of Highway 1 may also require moving an additional hole west of the highway to retain playability and flow of the course, thereby increasing the number of holes west of the highway to 15 and decreasing to three the number of holes to the east. Creating a new hole east of Highway 1 would decrease the number of holes west of the highway to 13 and increase to five the number of holes to the east. The determination of where the replacement hole is constructed and whether additional holes need to be moved would require additional environmental review.	SFRPD	During implementation of Sharp Park restoration project— • Consultation with golf course consultant: • Replacement of Hole 12 • Additional environmental review.	SFRPD	Considered complete when agreed upon design of golf course consultant is constructed
Biological Resources				
Mitigation Measure M-BI-1a: Protection of Protected Species and Riparian and Wetland Habitat Where there is potential for protected species or their habitats (plants, birds, terrestrial, and aquatic species) or other protected habitats, namely riparian and wetland habitat (as protected by California Department of Fish and Game, California Coastal Commission, San Francisco Bay Regional Water Quality Control Board and/or US Army Corps of Engineers) to be affected directly or indirectly by a programmatic project, the SFRPD will prepare and provide for ERO review a compliance plan that details the proposed project, whether any protected species, protected species habitat, riparian habitat, or wetland habitat exists, the appropriate life histories of such resources (as applicable to special status species), and how the project will achieve compliance with this mitigation measure, including details as to how the SFRPD will first avoid, then minimize and if necessary restore, and/or compensate for any impacts to protected species and/or their habitats or other regulated habitats. Where there is potential for impacts to protected species and/or riparian and wetland habitats that are regulated by state, federal and/or local agencies, the compliance plan shall identify those agencies, and the SFRPD shall coordinate with all applicable resource agencies to obtain the appropriate permits and/or consultation as required by state or federal law. This mitigation measure requires SFRPD to implement the following, subject to modification through the regulatory approval processes required for an individual project.	SFRPD	Where there is potential for protected species or their habitats may be affected by programmatic project— • Preparation of a compliance plan • Implementation of plan • Ongoing review • Application for necessary permits.	SFRPD	Ongoing

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M-BI-1a: To avoid disturbance to protected species, their habitats, and riparian or wetland habitat, the following measures will be implemented by the SFRPD: For protected species, a qualified SFRPD biologist shall survey for suitable habitat within the project area before the project begins, according to US Fish and Wildlife Service and California Department of Fish and Game protocol for the protected species having the potential to occur. If no protocol exists, surveys shall be conducted according to generally accepted survey methods. If individuals were found or if it is determined that the potential exists for protected species to be present, the SFRPD shall redesign the proposed project to avoid impacts on protected species. Avoidance/minimization measures shall include conducting project activities during periods of the species lifecycle when the species would not be affected or may be minimally affected by project activities. If it is infeasible to avoid disturbance of protected species, the SFRPD will contact the US Fish and Wildlife Service or California Department of Fish and Game and undertake appropriate consultation according to the California Endangered Species Act or Endangered Species Act (unless an existing Biological Opinion is already in place and the proposed activities fall under the actions of that Biological Opinion, as may be the case for impacts to the mission blue butterfly at Twin Peaks). Any additional requirements agreed to during consultation with the US Fish and Wildlife Service and California Department of Fish and Game, or other regulatory agencies, to protect the species would be implemented, including restoration and compensation, where required. Where there is potential for wetland or riparian areas to be affected by programmatic activities, the SFRPD shall coordinate with California Department of Fish and Game, California Coastal Commission, San Francisco Bay Regional Water Quality Control Board, US Army Corps of Engineers and/or other applicable agencies to determine the jurisdictional boundaries of protected riparian and wetland habitat. SFRPD shall apply for all appropriate permits for effects to riparian areas and wetlands (including, but not limited to, US Army Corps of Engineers 404 permits, California Department of Fish and Game Section 1602 permits, San Francisco Bay Regional Water Quality Control Board 401 Water Quality Certifications, and coastal development permits). Any additional requirements to protect riparian and wetland habitat resulting from the regulatory approval processes would be implemented, including restoration and compensation, where required. As discussed in Section III.E.5, new trails would be designed to avoid sensitive species habitat and riparian and wetland habitat. Where habitat for protected species or riparian and wetland habitat cannot be avoided, the programmatic project would be required to restore and/or compensate for habitat losses in accordance with measures 4 and 5 of this mitigation measure. Restoration and/or compensation shall be required at a minimum of a 1:1 ratio of habitat affected to habitat restored and/or compensated.	SFRPD	Where there is potential for protected species or their habitats may be affected by programmatic project— • Preparation of compliance plan • Implementation of Plan • Ongoing review • Application for any necessary permits	SFRPD	Ongoing and as-needed

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M-BI-1a: To minimize disturbance to protected species, their habitat, and wetland and riparian habitat, as a result of programmatic projects, the following minimization measures will be implemented by SFRPD, as applicable. Post signs or install flagging and temporary fencing around protected species habitats and riparian and/or wetland habitats that are not being directly restored. No activities shall be allowed within fenced areas, including moving equipment, storing materials, or temporarily stockpiling soils. All exclusion fencing will be removed when work in the project area is completed. Where stream crossings are necessary, temporary stream crossings will be located in previously disturbed areas lacking riparian vegetation, pools, side ponds or other sensitive habitats unless otherwise permitted by natural resource agencies for habitat improvement activities or hazard abatement. At a minimum, all temporarily impacted areas shall be restored to their previous condition. In or near riparian or wetland habitat, programmatic project activities shall be limited to the dry season (generally April 15 to October 15) and include protective practices such as the use of geotextile cushions and other materials if heavy equipment will result in rutting or soil displacement (i.e. timber pads, prefabricated equipment pads, thick vegetative slash, geotextile fabric) and/or vehicles with balloon tires shall be employed. Where protected species are potentially present, a biological monitor shall be required (as determined after appropriate consultation with US Fish and Wildlife Service and California Department of Fish and Game) during implementation of the proposed project. The biological monitor shall survey for protected species to ensure avoidance of those species, wherever feasible; where avoidance is not feasible, the monitor would relocate any species throughout implementation of the programmatic project, as permitted by natural resource agencies. The exact relocation sites and requirements for relocation shall be determined through consultation/coordination with US Fish and Wildlife Service and/or California Department of Fish and Game.	SFRPD	Where there is potential for protected species or their habitats may be affected by programmatic project— • Posting of signs and installation of flagging and temporary fencing as necessary • Limiting of construction and maintenance to the dry season. Employment of protective practices as necessary	SFRPD	Ongoing and as-needed

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M-BI-1a: Where disturbance of protected species, their habitat, or riparian or wetland habitat cannot be avoided or sufficiently minimized, the SFRPD shall restore the habitat functions and services of areas that are subject to disturbance during programmatic project activities at a minimum of a 1:1 ratio, in accordance with a detailed restoration plan or plans prepared by a qualified restoration ecologist and would be consistent with all required permits. Final restoration plans would include the following: Detailed work descriptions for the restoration actions; and b. Ecologically based criteria that shall be used to determine whether the restoration project(s) were achieving identified performance objectives. A schedule for monitoring and reporting on monitoring results shall be included, as agreed upon in coordination with applicable permitting agencies, and as needed to verify whether the vegetation is fully established. The final restoration plan may include the following: • Detailed description of restoration activities; • Restoration goals; • Restoration work plan; • Management and maintenance plan; • Success criteria and performance indicators; • Monitoring plan; and • Site protection measures.	SFRPD	Where disturbance of protected species, their habitat, or riparian or wetland habitat cannot be avoided— • Possible implementation of monitoring plan • Ongoing restoration activity	SFRPD	Ongoing and as-needed
M-BI-1a: Where avoidance and minimization measures are not sufficient to prevent a programmatic project from permanently removing protected species habitat, riparian, and/or wetland habitat and on- or off-site restoration or enhancement is not practicable, SFRPD shall provide compensatory mitigation for the impacts created at a minimum of a 1:1 ratio, unless otherwise determined by natural resources agencies. Examples include mitigation banking, in-lieu funds to parks for their restoration, or off-site preservation. Such activities would be evaluated in subsequent environmental reviews.	SFRPD	Compensatory mitigation for impacts as needed.	SFRPD	Ongoing and as-needed

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MITIGATION MONITORING AND REPORTING PROGRAM (Includes Text for Adopted Mitigation and Improvement Measures)

MEASURES ADOPTED AS CONDITIONS OF APPROVAL	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
M-BI-1b: Protection of Locally Significant Plant Species during Implementation of Programmatic Projects Where there is potential to impact locally significant plant species and SFRPD has not substantially enhanced the habitat for that species through restoration activities implemented by the NRMP already, SFRPD shall undertake the following measures to avoid and minimize impacts to locally significant plant species: • A qualified SFRPD biologist shall survey suitable habitat within the project area before the project begins. If locally significant plant species are found, the SFRPD shall redesign the proposed project to avoid or minimize impacts on locally significant plant species. • Where impacts to locally significant plant species cannot be avoided, SFRPD shall harvest the seeds of, or salvage, the affected species and use collected plants or seeds to enhance and/or restore similar habitat within the Natural Areas or outside of the Natural Areas, if necessary. To the extent feasible, habitat enhancement or restoration shall take place at sites already planned for other mitigation for the project or as part of other restoration activities carried out by SFRPD; if habitat is not suitable at those sites, habitat enhancement or restoration shall be carried out at appropriate nearby sites through strategies such as transplantation, relocation or seed harvest. Enhancement and/or restoration of locally significant plant species habitat shall be designed to meet a minimum of a 1:1 ratio of affected plants/habitat to enhanced and/or restored habitat.	SFRPD	If necessary, SFRPD shall harvest the seeds of, or salvage, the affected species and use collected plants or seeds to enhance and/or restore similar habitat within the Natural Areas or outside of the Natural Areas.	SFRPD	Ongoing and as-needed

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MEASURES ADOPTED AS CONDITIONS OF APPROVAL	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
Mitigation Measure M-BI-5: Protection of Special Status Species during Routine Maintenance The SFRPD shall avoid disturbance to biological resources by undertaking the following measures during routine maintenance activities: • Natural Areas Program staff and/or SFRPD staff engaged in routine maintenance activities as part of the NRMP shall receive annual training on the special status species that occur within the Natural Areas. The training shall identify the special status species that occur within the Natural Areas, their life history, measures to be implemented to avoid impacts to those species, and the proper protocol for encountering special status species. The SFRPD shall confirm that all SFRPD staff engaged in routine maintenance activities as part of the NRMP has been trained appropriately. • An education program for other field personnel (e.g. volunteers) shall be conducted by the SFRPD staff before field activities begin at a new site that has the potential to contain special status species. The field education program will consist of a brief presentation by persons knowledgeable in the applicable special status species and will include identifying the locations of protected species and locally significant plant species and an explanation of the measures being taken to avoid these species. The SFRPD shall confirm that all workers and volunteers have been trained appropriately. Disturbance of special status plant species shall be avoided. SFRPD staff shall conduct a reconnaissance survey of maintenance areas prior to undertaking routine maintenance activities to ensure that no special status plant species are present. If such species are found to be present, activities in those areas would be relocated or modified so as to avoid potentially affecting those species. SFRPD staff shall ensure that all volunteers and others involved in maintenance or restoration activities follow protection protocols. Vehicle operators shall use existing access roads and would remain outside of habitat supporting protected species to the extent feasible. All vehicles shall be brought in clean and free of weeds to prevent the spread or introduction of invasive plant species.	SFRPD	To prevent disturbance to any biological resources— • Natural Areas staff to receive annual training • SFRPD staff to conduct education program for other field personnel • SFRPD staff to conduct a reconnaissance survey of special status plant species in maintenance areas.	SFRPD	Ongoing

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M-BI-5: California Red-Legged Frog and San Francisco Garter Snake: These species both potentially occur at the Sharp Park upper canyon. The following measures shall apply to this Natural Area: • To avoid disturbance of these species, maintenance work shall not occur in the vicinity of ponds and wetlands between November 15 and April 15, the breeding season for California red-legged frog and the season when San Francisco garter snakes are inactive in their winter burrows. • If maintenance cannot be avoided during the abovementioned time period, the SFRPD staff will conduct reconnaissance surveys of maintenance areas prior to undertaking maintenance work to ensure that no California red-legged frogs or San Francisco garter snakes are present. • Vegetation in all maintenance areas will be progressively cleared by hand equipment to a height of 4 inches and checked for the presence of snakes prior to disturbance and prior to equipment or vehicles entering the sites. Once vegetation is cleared, an additional pre-activity survey for the San Francisco garter snake and California red-legged frog shall be conducted in the maintenance area. • In the event that a California red-legged frog or San Francisco garter snake is encountered, all field work shall immediately stop. Field personnel shall notify the onsite SFRPD staff member who will confirm the species has moved outside of the work zone, or the work zone shall be adjusted to avoid the species. • SFRPD staff shall provide verbal notification to the US Fish and Wildlife Service and/or to the local California Department of Fish and Game warden or biologist (as applicable) within one working day of the encounter. The SFRPD shall follow up with written notification to the US Fish and Wildlife Service and/or California Department of Fish and Game (as applicable) within five working days. Maintenance activities in the location of the encounter would be prohibited until SFRPD has contacted and properly consulted with US Fish and Wildlife Service and/or California Department of Fish and Game. Field personnel shall submit all observations of protected species to the California Natural Diversity Database.	SFRPD	When working at Sharp Park— CRLF: • Avoid construction during breeding season • Install flagging and temporary fencing around frog habitat • Restore habitat when necessary • On-site biological monitor during project activities to advise and to relocate species as necessary SFGS: • Implement best management practices • Schedule activities outside of hibernation season • Install temporary fencing and flagging as needed.	SFRPD	Ongoing

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MEASURES ADOPTED AS CONDITIONS OF APPROVAL	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
M-BI-5: Western Pond Turtle: This species occurs at Lake Merced and Sharp Park and may occur at Pine Lake. The following measures shall apply to these Natural Areas: • To avoid disturbance of this species, routine maintenance work shall be avoided within wetlands, ponds and adjacent uplands, between May 15 and July 15, the nesting season for western pond turtles. • If maintenance work cannot be avoided during the abovementioned time period, the SFRPD staff shall conduct reconnaissance surveys of maintenance areas prior to undertaking maintenance work to ensure that no western pond turtles or their nests are present. • In the event that a western pond turtle is encountered, all field work shall immediately stop. Field personnel shall notify the onsite SFRPD staff member who will confirm the species has moved outside of the work zone, or the work zone shall be adjusted to avoid the species. • SFRPD staff shall provide verbal notification to the local California Department of Fish and Game warden or biologist (as applicable) within one working day of the encounter. The SFRPD shall follow up with written notification to California Department of Fish and Game within five working days. Maintenance activities in the location of the encounter would be prohibited until SFRPD has contacted and properly consulted with California Department of Fish and Game. Field personnel shall submit all observations of protected species to the California Natural Diversity Database.	SFRPD	When working at Sharp Park, Lake Merced, or Pine Lake— • Relocate species from Pine Lake to Lake Merced on an as-needed basis.	SFRPD	Ongoing
M-BI-5: San Francisco Dusky-Footed Woodrat: This species occurs in the Sharp Park upper canyon. The following measure shall apply to this Natural Area: • SFRPD staff will conduct reconnaissance surveys of maintenance areas prior to undertaking maintenance work to identify locations of woodrat middens. • To avoid disturbance of the San Francisco dusky-footed woodrat, no vegetation shall be cleared within a 10-foot buffer of an active or potentially active woodrat middens.	SFRPD	When working at Sharp Park— • Conduct reconnaissance surveys • Avoid disturbance	SFRPD	Ongoing

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MEASURES ADOPTED AS CONDITIONS OF APPROVAL	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
M-BI-5: Western Red Bat: If an occupied or active roost is identified during maintenance activities, the roost shall not be disturbed. No maintenance work within 150 feet of the potentially occupied roost shall occur until it has been determined that bats are no longer using the site. • In the event that a western red bat is encountered, all field work shall immediately stop. Field personnel shall notify the onsite SFRPD staff member who shall confirm that the species has moved outside of the work zone, or the work zone shall be adjusted to avoid the species. • SFRPD staff shall provide verbal notification to the local California Department of Fish and Game warden or biologist (as applicable) within one working day of the encounter. The SFRPD shall follow up with written notification to California Department of Fish and Game within five working days. Maintenance activities in the location of the encounter would be prohibited until SFRPD has contacted and properly consulted with California Department of Fish and Game. Field personnel shall submit all observations of protected species to the California Natural Diversity Database.	SFRPD	If a Western Red Bat is identified— • Roost shall not be disturbed. • All field work to stop immediately. • Notify CDFG.	SFRPD	Ongoing
M-BI-5: Mission Blue Butterfly: This species occurs at Twin Peaks and Sharp Park. The following measures shall apply to these Natural Areas: To avoid impacts to this species, SFRPD shall adhere to the long-term management and monitoring guidelines as described in the Recovery Action Plan for the Mission Blue Butterfly at Twin Peaks Natural Area and the corresponding Biological Opinion and as agreed to with the US Fish and Wildlife Service. These guidelines include conducting vegetation removal by manual, mechanical and chemical treatments that would be applied consistent with the SFRPD Integrated Pest Management program, such as hand pulling, cutting and grubbing. To avoid impacts from trampling of host plants by recreational users, the SFRPD shall continue to conduct regular maintenance on the existing trail network including trimming trailside vegetation and replacing trail base materials.	SFRPD	To avoid impacts to Mission Blue Butterfly at Twin Peaks and Sharp Park— • Adhere to long-term management and monitoring guidelines as described in Recovery Action Plan for Mission Blue Butterfly at Twin Peaks Natural Area and corresponding Biological Opinion (USFW)	SFRPD	Ongoing

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MEASURES ADOPTED AS CONDITIONS OF APPROVAL	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
Mitigation Measure M-BI-6a: Protection of Protected Species during Implementation of the Sharp Park Restoration Project The SFRPD shall implement the following, subject to modification during the required regulatory approval processes: <u>Avoidance Measures:</u> • The number of access routes, the size of staging areas, and the total area of activity would be the minimum necessary to achieve the project goals and to the extent feasible access routes shall be located in upland areas; • Vehicle and equipment operators would use existing access roads and would remain outside of wetlands and riparian areas that are not integral to the restoration project; • The construction documents for the Sharp Park restoration project would identify construction staging areas, access corridors, and work zones that are least impactful to biological resources, as well as golf play and operations. Avoidance of wetlands and other biological resource areas, however, would take precedence over avoidance of golf play areas, such that golf play and operations would be impacted rather than biological resources; • After surveying the construction site for special -status species in accordance with this mitigation measure, silt fencing or exclusion fencing would be placed around the project and staging areas to reduce the potential for animals to enter the construction site. Fencing will be monitored throughout construction to ensure no San Francisco garter snakes, California red-legged frogs, or western pond turtles enter the area; fencing will meet CDFG specifications so as to avoid impacts to species potentially getting trapped in the fence. • No restoration and construction shall occur between November 15 and April 15, the breeding season for California red-legged frog and the season when San Francisco garter snakes are inactive in their winter burrows, although shrubs and willow posts may be planted by hand after the first rains, and weeds may be removed within 15 feet of aquatic areas during these times; • Before moving any vehicles that remain stationary for longer than 30 minutes, the biological monitor would inspect those vehicles to ensure that no animals had crawled beneath them for cover; • During project activities, all trash that could attract nonnative predators would be properly contained, removed from the work site, and disposed of regularly. Following project completion, all trash and construction debris would be removed from work areas.	SFRPD	During implementation of Sharp Park restoration project— • Follow avoidance measures	SFRPD	Pre-activity and ongoing

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MEASURES ADOPTED AS CONDITIONS OF APPROVAL	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
M-BI-6a: Pre-Construction and Construction Activities Prior to commencement of any on-site work related to the proposed removal of sediment and emergent vegetation in the Laguna Salada wetland complex, which includes the Horse Stable Pond and the connecting channel and culverts that link Horse Stable Pond and Laguna Salada, additional sediment core sampling tests shall be conducted, as necessary, in the manner specified in this mitigation measure to determine whether there are elevated concentrations of sulfides or other soil characteristics that would render the soils unsuitable for supporting the desired vegetation. The results of the sediment core sampling tests shall be submitted to the USFWS and CDFW for review prior to commencement of any on-site remediation work or sediment/vegetation removal work at Horse Stable Pond or the connecting channel and culverts. If remediation measures are required based on the results of the sediment core sampling tests, the SFRPD shall submit a remediation and monitoring plan (prepared by a qualified biological/hydrological consultant) to all applicable resource agencies for review prior to implementation of the remediation measures. Alternatively, the soils could be placed in a nonsensitive location. Copies of all correspondence with the resource agencies shall be submitted to the ERO. The sediment core sampling tests shall include the following elements: Work Plan, Sampling of Sediment Cores, Analysis of Sediment Cores and Estimation of the Potential for Formation of Acid Sulfate Soils, Toxics Pathway Analysis, Remediation.	SFRPD	Prior to commencement of any on-site work— • Conduct sediment core sampling tests • Submit sampling tests results to USFWS and CDFW prior to any on-site remediation work or sediment/vegetation removal work at Horse Stable Pond. • Submit a remediation and monitoring plan to all applicable resource agencies prior to implementation of remediation measures.	SFRPD	Pre-activity
M-BI-6a: Work Plan A Work Plan for sediment core sampling tests shall be prepared by a qualified SFRPD biological/hydrological consultant and submitted to the USFWS and CDFW for review. The Work Plan shall describe, at a minimum, compliance with Tasks 2 through 5 of this part of the mitigation measure, as well as the "During and Post-Construction pH Monitoring" requirement (see following section). Copies of all correspondence with the responsible agencies shall be submitted to the ERO.	SFRPD	Prior to commencement of any on-site work—	SFRPD	Pre-activity

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MEASURES ADOPTED AS CONDITIONS OF APPROVAL	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
M-BI-6a: Sampling of Sediment Cores The locations of any additional sampling shall be determined pursuant to the work plan developed in accordance with Task 1, above. Sample sediment cores shall include the soils between the current surface sediment level and approximately two to three feet below the current surface. This depth shall be at least one foot below the proposed depth of the future sediment-water interface.	SFRPD	Prior to commencement of any on-site work—	SFRPD	Pre-activity
M-BI-6a: Analysis of Sediment Cores and Estimation of the Potential for Formation of Acid Sulfate Soils The sediment cores shall be analyzed every five centimeters over the first 20 centimeters of core depth and then every 10 centimeters, or as appropriate based on field conditions, for the remainder of the core length for the following components: Total Organic Carbon (TOC), carbonate/bicarbonate, sulfate, sulfide, sulfites, pH, calcium, sodium, iron, aluminum, chloride, conductivity, redox potential, refractory organics, organic nitrogen, total phosphorus, ammonia, nitrate+nitrite nitrogen, soluble reactive phosphorus, organic phosphorus, loosely-sorbed phosphorus, iron-phosphorus, iron-phosphorus, aluminum-phosphorus, and calcium-phosphorus. Sediment core chemistry shall be analyzed to assess the potential reduction of sulfate to form hydrogen sulfate, iron sulfides, and reduction buffering capacity relative to acid-neutralizing capacity. In addition, sediment oxygen demand (SOD) in the sediment cores shall be measured. Results shall be compared to the total oxidizable organic material, which would be estimated from the difference of TOC and refractory organic carbon (labile carbon). These results shall be used in the analysis of potential for formation of anoxic conditions within the Laguna Salada Wetlands Complex. Sediment cores shall be analyzed based on Toxicity Reference Values (TRVs) from the USEPA and Screening Quick Reference Tables (SQuiRT) from the National Oceanic Atmospheric Administration. A draft summary of potential toxics shall be provided to the USFW, CDFW, and ERO for review and, if needed, revision will be made to the toxicity ranges appropriate for use in analyzing the sediment cores. The potential for formation of acid sulfate soils and anoxic conditions in the water column shall be estimated based on this analysis and in coordination with the USFWS and CDFW. If this analysis determines that acid sulfate soils could be present in this location, the SFRPD shall perform a toxic pathway analysis to determine the appropriate remediation measures. The analysis results and determination shall be submitted to the USFWS, CDFW, and ERO.	SFRPD	Prior to commencement of any on-site work—	SFRPD	Pre-activity

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M-BI-6a: Toxics Pathway Analysis Should the potential for acid sulfate soils and anoxic conditions be present, a toxics pathway analysis shall be conducted for potential risks and toxicities to species that may be affected by localized increases in acidity, hypoxia, or dissolved metals concentration. During this Task, toxicity standards shall be established in coordination with the USFWS, CDFW, and ERO based on the results of Tasks 2 and 3 above, site-specific hydrologic conditions including water exchange and dissolved oxygen levels, the species that are known to be present, and literature review. The results of this task shall be submitted to the USFWS and CDFW and any applicable responsible agencies for review and comment. Copies of all correspondence with the responsible agencies shall be submitted to the ERO. Should the results of the sediment core tests reveal that there has been an appreciable increase in the amount of nitrogen and related compounds in the sediment cores, any necessary measures to remediate such compounds shall be undertaken in accordance with Task 5, below. The SFRPD shall hire a qualified biological/hydrological consultant to prepare a remediation and monitoring plan which shall be submitted to the USFWS and CDFW for review and approval. Copies of all correspondence with the resource agencies shall be submitted to the ERO for review.	SFRPD	Prior to commencement of any on-site work	SFRPD	Pre-activity

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MEASURES ADOPTED AS CONDITIONS OF APPROVAL	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
M-BI-6a: Remediation If results of the sediment core chemistry analysis reveal the potential for reduction of sulfate to form hydrogen sulfate, iron sulfides, and its reduction in buffering capacity relative to acid-neutralizing capacity, or if the toxics pathway analysis indicates that their presence could potentially result in substantial stress to special-status species, the SFRPD shall implement remediation measures. Remediation measures could include, but are not limited to: • Addition of lime to neutralize any acid that exists or which may form during the sediment removal process; • Injection of sodium nitrate to oxidize the sediments, thereby satisfying the sediment oxygen demand; or • Use of suction hydraulic sediment removal that reduces re-suspension of any form of sediments. Depending on the severity of the condition (e.g., hypoxia), the remediation measure selected for implementation would be the least intensive beginning with Item a, when signs of hypoxia are present, to the most intensive with Item c, when hypoxia is persistent and/or widespread. The SFRPD shall select the remediation measure in consultation with the USFWS and CDFW. The remediation measure shall be selected based on immediate threats to species and sensitive life stages present during occurrence of the hypoxic condition.	SFRPD	Prior to commencement of any on-site work	SFRPD	Pre-activity
M-BI-6a: A worker education program shall be implemented to familiarize workers, including all vehicle operators, of the importance of avoidance of harm to special-status species and the proper protocol should a protected species be encountered. The training shall include a discussion of the importance of maintaining speed limits and respecting exclusion zones. The SFRPD and its construction contractor shall confirm that all workers have been trained appropriately.	SFRPD	Prior to commencement of any on-site work	SFRPD	Pre-activity and ongoing

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MEASURES ADOPTED AS CONDITIONS OF APPROVAL	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
M-BI-6a: Two weeks prior to the commencement of work activities and immediately prior to commencement of work, a qualified biologist will survey aquatic habitat that is suitable for the California red-legged frog, San Francisco garter snake, and western pond turtle that would be affected by the project. If individuals in any life stages of these species are found, the biologist will contact the USFWS and/or CDFG to determine whether relocating any life stages is appropriate. Collection of California red-legged frogs, San Francisco garter snakes, and western pond turtles would be done with hand nets, and shall be relocated to areas of appropriate habitat; Upland vegetation in all construction areas will be progressively cleared by hand equipment to a height of 4 inches and checked for the presence of protected species prior to disturbance and prior to construction equipment or vehicles entering the sites. Once vegetation is cleared, an additional pre-activity survey for the San Francisco garter snake, western pond turtles, and California red-legged frogs will be conducted in the impact area.	SFRPD	Two weeks prior to commencement of any on-site work— • Biologist to survey aquatic habitat • Contact USFWS and/or CDFG	SFRPD	Pre-activity
M-BI-6a: Prior to construction near wetlands or ponds, all rodent burrows in the construction area will be hand excavated until the burrows terminate or to a maximum depth of 30 centimeters in areas where soil or fill will be removed or placed.	SFRPD	Prior to construction near wetlands or ponds— • Hand excavate all rodent burrows in construction area.	SFRPD	Pre-activity

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MEASURES ADOPTED AS CONDITIONS OF APPROVAL	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
M-BI-6a: Biological Monitor: • A biological monitor familiar with the identification and life history of California red-legged frog, San Francisco garter snake, western pond turtle, and other potentially present protected species, and with the appropriate agency authorization, shall be designated to periodically inspect onsite compliance with all mitigation measures. • The biological monitor shall perform a daily survey of the entire project area during construction activities. During these surveys, the monitor shall inspect the exclusion fencing for individuals trapped within the fence and determine the need for fence repair. Throughout the duration of the project, the monitor shall continue to perform daily fence surveys and compliance reviews at the project site. The monitor shall be designated prior to project implementation and shall have at least one specialty environmental monitor on call, with a valid 10(a)(1)(A) permit to handle listed species. The specialty monitor shall direct all personnel in regards to interactions with protected species, perform authorized species relocations, and supervise all reporting on such species. • Bullfrog monitoring will occur and egg masses detected shall be removed.	SFRPD	Prior to commencement of any on-site work and during construction activities	SFRPD	Pre-activity and ongoing
M-BI-6a: During and Post Construction pH Monitoring: During sediment and vegetation removal in the Laguna Salada Wetland Complex, pH levels immediately above the sediment shall be monitored by the SFRPD to ensure that implementation of the proposed project would not adversely affect special-status species. To ensure that residual acid sulfates in the water column would not adversely impact special-status species, pH levels in Horse Stable Pond and the connecting channel shall be monitored by the SFRPD for a period of six weeks after the proposed sediment and vegetation removal is completed. A remediation measure, such as addition of lime or injection of sodium nitrate, shall be implemented if the monitoring warrants such a remediation measure to protect special-status species based on the toxicity standards that are established in accordance with Task 4 above.	SFRPD	During construction activities and post construction— • Monitor pH levels immediately above the sediment • Monitor pH levels in Horse Stable Pond and connecting channel for a period of six weeks after proposed sediment and vegetation removal is completed.	SFRPD	Post-construction

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Mitigation Measure M-BI-6b: Protection of Protected Species during Maintenance of the Sharp Park Restoration Project The SFRPD shall implement the following, subject to modification during the required regulatory approval processes: • To avoid disturbance of the San Francisco garter snake, California redlegged frog and western pond turtle, maintenance work shall not occur in the vicinity of ponds and wetlands between November 15 and April 15, the breeding/nesting season for California red-legged frog and the season when San Francisco garter snakes are inactive in their winter burrows. • If maintenance cannot be avoided during the abovementioned time period, the Natural Areas Program will conduct reconnaissance surveys of maintenance areas prior to undertaking maintenance work to ensure that no California red-legged frogs, western pond turtles or San Francisco garter snakes are present. • Heavy equipment would remain outside of wetlands to the extent feasible. If it is infeasible to avoid wetlands, no heavy equipment shall be used within wetlands between October 15 and April 15. • In the event that a California red-legged frog, western pond turtle or San Francisco garter snake is encountered, all work shall immediately stop. Field personnel shall notify the onsite SFRPD staff member who will confirm that the species has moved outside of the work zone, or the work zone shall be adjusted to avoid the species. • SFRPD staff shall provide verbal notification to the US Fish and Wildlife Service and/or to the local California Department of Fish and Game warden or biologist (as applicable) within one working day of the encounter. The SFRPD shall follow up with written notification to the US Fish and Wildlife Service and/or California Department of Fish and Game (as applicable) within five working days. Maintenance activities in the location of the encounter would be prohibited until SFRPD has contacted and properly consulted with US Fish and Wildlife Service and/or California Department of Fish and Game. Field personnel shall submit all observations of protected species to the California Natural Diversity Database.	SFRPD	During maintenance of Sharp Park Restoration Project— • No maintenance work to occur between November 15 and April 15 • No heavy equipment shall be used within wetlands between October 15 and April 15.	SFRPD	Ongoing

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MEASURES ADOPTED AS CONDITIONS OF APPROVAL	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
Mitigation Measure M-BI-12a: Protection of Wetlands during the Sharp Park Restoration Project The SFRPD shall obtain all applicable permits from San Francisco Bay Regional Water Quality Control Board, California Coastal Commission, US Army Corps of Engineers, and California Department of Fish and Game for impacts to wetland habitat. Measures identified in these permits shall be applied, in addition to the following measures, unless otherwise specified by resource agencies: • Except for those areas directly being restored, a minimum 100-foot buffer surrounding all wetlands, ponds, streams, drainages, and other aquatic habitats located on or within 100 feet of the project site shall be clearly designated on the final project construction plans and marked on the site with orange construction fencing or silt fencing. If the area is on a slope, silt fencing or other comparable management measures will be installed to prevent polluted runoff, as well as equipment, from entering the buffer area. Signs shall be installed every 100 feet on or adjacent to the buffer fence that read, "Environmentally Sensitive Area – Keep Out." Fencing and management measures shall be installed and inspected prior to project implementation and maintained throughout the restoration period. No equipment mobilization, grading, clearing, storage of equipment or machinery, vehicle or equipment washing, or similar activity, may occur until a representative of the SFRPD has inspected and approved the fencing and/or management measures installed around these features; • Vehicle and equipment operators would use existing access roads and would remain outside of wetlands and riparian areas that are not directly associated with habitat restoration. Project construction and staging areas would be delineated with construction fencing and shall avoid wetland habitat to the maximum extent feasible; • All vehicles would be brought in clean and free of weeds to prevent the spread or introduction of invasive plant species. Vehicles and equipment would be fueled, maintained, and parked at least 100 feet from wetlands. Each morning, operators would inspect all equipment that requires the use of fuel or fluids for leaks; • Silt barriers, such as sand bags, silt fences/curtains, or basins, would be installed before the project begins;	SFRPD	Prior to and during implementation of Sharp Park Restoration Project— • Pre-activity establishment of success criteria and monitoring program • Ongoing establishment of 100-foot riparian habitat buffer using silt fencing and construction fencing	SFRPD	Pre-activity

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• Wet sediments taken from the wetlands would be stockpiled so water could drain or evaporate before removal. Stockpiles would be placed in upland areas with the perimeters protected by best management practices to avoid polluted runoff; • All soil stockpiles shall be protected against wind and rainfall erosion at all times. Plastic sheeting or other similar material shall be used to cover soils and would be securely anchored by sandbags or other suitable means. At no time would any stockpiled materials be allowed to erode into any water body or drainage facility or onto any roadway; and • Ground disturbing construction and maintenance activities shall be avoided during the rainy season and consistent with Mitigation Measure M-BI-6a.				
Mitigation Measure M-BI-12b: Laguna Salada Restoration Project Wetland Mitigation Plan Consistent with the requirements for a Section 401 water quality certification permit, the SFRPD shall prepare a mitigation plan. Additionally, because this is a restoration project, the California Coastal Commission may require an objective performance evaluation to determine project success which would include a monitoring program and methods for evaluating performance, which could be accomplished through implementation of the wetland mitigation plan. The wetland mitigation plan shall include, at a minimum, a description of the following: • Proposed project's physical and biological impacts; • Mitigation goals; • Mitigation work plan; • Management and maintenance plan; • Success criteria and performance indicators • Monitoring plan; and • Site protection measures. The components of the above mitigation plan may be altered, supplemented, or deleted during the San Francisco Bay Regional Water Quality Control Board's review process, as the San Francisco Bay Regional Water Quality Control Board has final authority over the terms of the water quality certification.	SFRPD	Prior to Laguna Salada Restoration Project implementation— • Preparation of mitigation plan	SFRPD	Required to obtain water quality certification
Hydrology and Water Quality				

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MITIGATION MONITORING AND REPORTING PROGRAM (Includes Text for Adopted Mitigation and Improvement Measures)

MEASURES ADOPTED AS CONDITIONS OF APPROVAL	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
Mitigation Measure M-HY-1: Implementation of Stormwater Pollution Prevention Measures Construction projects that do not drain to San Francisco's combined sewer system and involve one or more acres of land disturbance are required to obtain coverage under the NPDES General Permit for Stormwater Discharges Associated with Construction Activity. In accordance with the NPDES General Permit requirements, the SFRPD or its contractors would submit a notice of intent to the SWRCB's Division of Water Quality, would develop a SWPPP, and would implement site-specific BMPs to prevent discharges of nonpoint source pollutants in construction-related stormwater runoff to storm drains and water bodies. As required by the NPDES General Construction Permit, trained and certified persons would prepare the SWPPPs and would conduct inspections to ensure the effectiveness of the BMPs. Listed below are BMPs that would be implemented at the Natural Areas to meet the minimum requirements of the NPDES General Construction Permit. These measures may be altered, supplemented, or deleted during the SFBRWQCB's review process, as it has final authority over the terms of the SWPPP. Other programmatic projects shall implement the following measures, where applicable to a project, unless other equally or more effective measures are determined to be necessary during future project-specific environmental review. These projects are those on less than one acre and that do not require a NPDES General Construction Permit or that drain to San Francisco's combined sewer system and are regulated by the SFPUC.	SFRPD	For the implementation of Best Management Practices— • Preparation of SWPPP documents	SFRPD and trained certified SWPPP reporter/inspector, SFBRWQCB	Ongoing

ATTACHMENT 2:
MITIGATION MONITORING AND REPORTING PROGRAM (Includes Text for Adopted Mitigation and Improvement Measures)

MEASURES ADOPTED AS CONDITIONS OF APPROVAL	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
M-HY-1: Schedule to Avoid or Minimize Impacts • Schedule construction to minimize ground disturbance during the rainy season; • Sequence construction activities to minimize the amount of time that soils remain disturbed; • Stabilize all disturbed soils as soon as possible following the completion of ground-disturbing work in any area of the project site; • Provide plans to stabilize soil with vegetation or physical means in the event rainfall is expected; and • Install erosion and sediment control best management practices prior to the start of any ground-disturbing activities.	SFRPD	Adherence to schedule to avoid or minimize impacts	SFRPD	Ongoing
M-HY-1: Erosion and Sediment Controls • Preserve existing vegetation in areas where no construction activity is planned or where construction activity will occur at a later date; • Stabilize and revegetate disturbed areas as soon as possible after construction with planting, seeding, and/or mulch (e.g., straw or hay, erosion control blankets, hydromulch, or other similar material), except in actively cultivated areas; • Install silt fences, coir rolls, and other suitable measures around the perimeter of the construction zone, staging areas, storm drains, temporary stockpiles, spoil areas, stream channels, swales, downslope of all exposed soil areas, and other locations determined necessary to prevent off-site sedimentation; • Install temporary slope breakers during the rainy season on slopes greater than 5 percent where the base of the slope is less than 50 feet from a water body, wetland, or road crossing, at spacing intervals required by the San Francisco Bay Regional Water Quality Control Board; • Use filter fabric or other appropriate measures to prevent sediment from entering storm drain inlets; and • Detain and treat stormwater and water produced by construction site dewatering using sedimentation basins, sediment traps (when water is flowing and there is sediment), baker tanks, or other measures to ensure that discharges to receiving waters meet applicable water quality objectives.	SFRPD	Implementation of Erosion and Sediment Controls	SFRPD	Ongoing

ATTACHMENT 2: MITIGATION MONITORING AND REPORTING PROGRAM (Includes Text for Adopted Mitigation and Improvement Measures)				
MEASURES ADOPTED AS CONDITIONS OF APPROVAL	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
M-HY-1: Housekeeping • Store all equipment, materials, fuels, lubricants, solvents, and other possible contaminants away from waterways and in secured locations; • Check equipment for leaks regularly; • Wash construction equipment in a designated enclosed area regularly; and • Refuel all vehicles and equipment at least 100 feet from any water bodies	SFRPD	Implementation of Housekeeping measures	SFRPD	Ongoing
M-HY-1: Waste Management and Hazardous Materials Pollution Control • Remove trash and construction debris from the project area daily; • Locate sanitary facilities a minimum of 300 feet from water bodies; • Maintain sanitary facilities regularly; • Maintain spill containment and cleanup equipment onsite and properly label and dispose of wastes; • Locate waste collection areas close to construction entrances and away from roadways, storm drains, and water bodies; • Inspect trash receptacles and other waste and debris containers regularly for leaks and remove and properly dispose of any hazardous materials and liquid wastes placed in these containers; and • Train construction personnel in proper material delivery, handling, storage, cleanup, and disposal procedures.	SFRPD	Implementation of Waste Management and Hazardous Materials Pollution Control Measures	SFRPD	Ongoing
M-HY-1: Best Management Practices Inspection, Maintenance, and Repair • Inspect all best management practices regularly to confirm proper installation and function; • Inspect all stormwater best management practices daily during storms; • Inspect sediment basins, sediment traps, and other detention and treatment facilities regularly throughout the construction period; • Provide sufficient devices and materials (e.g., silt fence, coir rolls, and erosion blankets) throughout project construction to enable immediate repair or replacement of failed best management practices; and • Inspect all seeded and revegetated areas regularly for failures and remediate or repair them immediately.	SFRPD	Implementation of BMP Inspection, Maintenance and Repair Measures	SFRPD	Ongoing

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MITIGATION MONITORING AND REPORTING PROGRAM (Includes Text for Adopted Mitigation and Improvement Measures)

MEASURES ADOPTED AS CONDITIONS OF APPROVAL	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
M-HY-1: Post-construction Best Management Practices • Revegetate all temporarily disturbed areas as required after construction; • Remove any remaining construction debris and trash from the project site and area on project completion; • Phase the removal of temporary best management practices as necessary to ensure stabilization of the site; • Maintain post-construction site conditions to avoid any unintended drainage channels, erosion, or areas of sedimentation; and • Correct post-construction site conditions as necessary to comply with the stormwater pollution prevention plan and any other pertinent San Francisco Bay Regional Water Quality Control Board requirements.	SFRPD	Implementation of Post-Construction BMPs	SFRPD	Ongoing
Hazards and Hazardous Materials				
Mitigation Measure M-HZ-13: Emergency Response Plan for Accidental Releases of Hazardous Materials To reduce impacts from the accidental release of hazardous materials, the SFRPD shall prepare an emergency response plan for the Sharp Park restoration and each programmatic project that uses gasoline- or diesel powered equipment before the project began. The plan shall include emergency procedures for hazardous materials releases. These procedures shall include requirements for the necessary personal protective equipment, spill containment procedures, and worker training to respond to accidental spills and releases. The plan shall also require equipment to be refueled at least 100 feet from any streams or water bodies. During the implementation of programmatic projects, all hazardous materials, including any hazardous wastes, shall be used, stored, transported, and disposed of in accordance with local, state, and federal hazardous materials regulations. Developing and implementing the plan will ensure the proper storage and use of hazardous materials, proper response to accidental releases, and worker training, all of which will minimize contamination from hazardous materials.	SFRPD	Prior to Sharp Park restoration— • Prepare emergency response plan if necessary	SFRPD	Ongoing

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MEASURES ADOPTED AS CONDITIONS OF APPROVAL	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
Mitigation Measure M-HZ-14: General Emergency Response Plan for Routine Management Activities Using Gasoline- or Diesel-Powered Equipment To reduce impacts from accidental releases of hazardous materials, the SFRPD shall prepare a general emergency response plan to address routine management activities that use gasoline- or diesel-powered equipment. The plan shall include emergency procedures for hazardous materials releases with requirements for the necessary personal protective equipment, spill containment procedures, and worker training to respond to accidental spills and releases. The plan shall also require equipment to be refueled at least 100 feet from any streams or water bodies. During routine maintenance, all hazardous materials, including any hazardous wastes, shall be used, stored, transported, and disposed of in accordance with local, state, and federal hazardous materials regulations. Developing and implementing the plan will ensure the proper storage and use of hazardous materials, proper response to accidental releases, and worker training, all of which will minimize contamination from hazardous materials.	SFRPD	Prepare a general emergency response plan to address routine management activities that use gasoline- or diesel-powered equipment.	SFRPD	Ongoing

ATTACHMENT 2:
MITIGATION MONITORING AND REPORTING PROGRAM (Includes Text for Adopted Mitigation and Improvement Measures)

MEASURES ADOPTED AS CONDITIONS OF APPROVAL	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
Air Quality				
Mitigation Measure M-AQ-1: Fugitive Dust Reduction The SFRPD would implement the requirements of the Dust Control Ordinance for all programmatic projects that are outside of San Francisco to reduce fugitive dust emissions. For projects less than half an acre, the SFRPD would comply with the general dust control requirements listed in Section 106.3.2.6.3(c) of the San Francisco Building Code, which are: • Water 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. • Provide as much water as necessary to control dust (without creating runoff) in any area of land clearing, earth movement, excavation, drillings, and other dust-generating activity. • During excavation and dirt-moving activities, wet sweep or vacuum the streets, sidewalks, paths, and intersections where work is in progress at the end of the workday. • Cover any inactive (no disturbance for more than seven days) stockpiles greater than ten cubic yards or 500 square feet of excavated materials, backfill material, import material, gravel, sand, road base, and soil with a 10 mil (0.01 inch) polyethylene plastic or equivalent tarp and brace it down or use other equivalent soil stabilization techniques. • Use dust enclosures, curtains, and dust collectors as necessary to control dust in the excavation area.	SFRPD	Compliance with Dust Control Ordinance for projects less than half an acre	SFRPD	Ongoing

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MEASURES ADOPTED AS CONDITIONS OF APPROVAL	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
M-AQ-1: For projects greater than half an acre, in addition to the general dust control requirements above, the SFRPD would prepare a site-specific dust control plan that requires the project sponsor to: • Submit a map to the director of the San Francisco Department 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 shutdown conditions based on wind, soil migration, and other factors; • Establish a hotline for surrounding community members who may be 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 secure the load with a tarpaulin; • Enforce a 15-mile per hour speed limit for vehicles entering and exiting construction areas; • Sweep affected streets with water sweepers at the end of the day; • Install and use wheel washers to clean truck tires; • Stop construction activities when winds exceed 25 miles per hour; • Apply soil stabilizers to inactive areas; and • Sweep off adjacent streets to reduce particulate emissions.	SFRPD	Compliance with Dust Control Ordinance for projects greater than half an acre	SFRPD	Ongoing

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MITIGATION MONITORING AND REPORTING PROGRAM (Includes Text for Adopted Mitigation and Improvement Measures)

MEASURES ADOPTED AS CONDITIONS OF APPROVAL	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
Mitigation Measure M-AQ-4: Construction Contract Specification to Reduce Construction Vehicle Emissions The SFRPD will consult with EP before implementing each programmatic project. Under EP's direction, the SFRPD will either conduct a refined air quality analysis prior to project implementation, or EP will provide a list of all feasible mitigation measures to incorporate into the construction specifications to reduce construction vehicle emissions. If SFRPD were to conduct a refined air quality analysis and find that construction-related criteria air pollutant emissions would be below the Bay Area Air Quality Management District thresholds, SFRPD would not be required to incorporate mitigation measures into the project's construction specifications. The following mitigation measures are examples of mitigation measures that EP might direct the SFRPD to incorporate into construction specifications for the Sharp Park restoration project or the programmatic projects. • For programmatic projects between 2011 and 2015, use Tier 3 equipment with best available control technology where feasible. For programmatic projects conducted after 2015, use Tier 4 equipment or interim Tier 4 equipment equipped with best available control technology where such equipment exists. • Use temporary power provided by the Pacific Gas & Electric Company instead of diesel generators; where it is not possible to plug into the electric grid, use Tier 3 diesel generators and air compressors. • Use concrete batched from local plants to limit concrete trucks' travel time and the amount of diesel exhaust emitted. • Minimize idling times by either shutting equipment and vehicles off when not in use or limiting the maximum idling time to five minutes or less (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Provide clear signage of idling rules for construction workers at all access points. • Use on-road haul trucks model year 2007 or later. • Maintain and properly tune construction equipment in accordance with manufacturer's specifications. Have all equipment checked by a certified mechanic to determine that equipment is running in proper condition prior to operation.	SFRPD	During any construction—Reduce construction vehicle emissions per agreement with EP	SFRPD	Ongoing

ATTACHMENT 2: MITIGATION MONITORING AND REPORTING PROGRAM (Includes Text for Adopted Mitigation and Improvement Measures)				
MEASURES ADOPTED AS CONDITIONS OF APPROVAL	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
M-AQ-10: Cumulative Health Risk Analysis for Programmatic Projects As part of the environmental review for all programmatic projects, the SFRPD will conduct a cumulative site-specific health risk analysis to determine if nearby sensitive receptors would be affected by those projects in combination with other known sources (e.g., roadway sources and permitted stationary sources) and existing construction projects within 1,000 feet. Based on the results of those analyses, EP would determine the need for and the scope of additional measures to reduce health risk impacts from construction activities. Mitigation measures to reduce construction-related health risks could include those listed under M-AQ-4.	SFRPD	Ongoing, environmental review for all programmatic projects— Site-specific health risk analysis to be conducted by SFRPD	SFRPD	Ongoing
Improvement Measure from the Initial Study				
Mitigation Measure I-ME-1 Consistent with the 2005 California Energy Action Plan II priorities for reducing energy use, the SFRPD would ensure that energy-efficient equipment is used to the extent practicable during project implementation.	SFRPD	Adherence to 2005 California Energy Action Plan 2 Guidelines	SFRPD	Ongoing

SAN FRANCISCO RECREATION AND PARK COMMISSION

RESOLUTION NO. XXXXXX

RESOLUTION ADOPTING FINDINGS UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT AND APPROVING THE NATURAL RESOURCES MANAGEMENT PLAN.

WHEREAS, The San Francisco Recreation and Park Department manages 32 Natural Areas that are scattered mostly throughout the central and southern portions of San Francisco and constitute approximately four percent of the total city area; one natural area is in Pacifica; and

WHEREAS, The Natural Areas managed by San Francisco Recreation and Park Department ("SFRPD") range in size from less than one acre to almost 400 acres and include such popular locations as Twin Peaks and portions of Glen Canyon Park; and

WHEREAS, In the late 1990s, the SFRPD initiated a Natural Areas Program to protect and manage these Natural Areas; and

WHEREAS, The SFRPD recognizes the need for a Management Plan to guide activities on properties owned or maintained by the SFRPD through its Natural Resources Program; and

WHEREAS, Over the course of several years, the SFRPD developed the Natural Resource Management Plan ("NRMP" or "Project"), with the final draft plan published in February 2006; and

WHEREAS, The NRMP contains detailed information on the biology, geology, and trails within 32 Natural Areas, 31 in San Francisco and one (Sharp Park) in Pacifica; and

WHEREAS, The NRMP is intended to guide natural resource protection, habitat restoration, trail and access improvements, other capital projects, and maintenance activities over the next 20 years; and

WHEREAS, The NRMP delineates the acreage within each Natural Area into management area categories based on the management priority; and

WHEREAS, The NRMP prescribes both general management activities that apply to all Natural Areas and management activities specific to each Natural Area; and

WHEREAS, The NRMP identifies a number of goals with respect to conservation and restoration, education, research, stewardship, recreation, and monitoring goals; and

WHEREAS, Recommended actions identified for each Natural Area are intended to meet the overall goals of the NRMP and may include, but are not limited to, habitat restoration, removal of invasive species, tree removal, erosion control, trail closure, relocation or creation, and closure or reduction of dog play areas; and

WHEREAS, On April 22, 2009, the Planning Department determined that an Environmental Impact Report ("EIR") was required under the California Environmental Quality Act, Public Resources Code Section 21000 *et seq.*, to analyze the environmental impacts of the proposed NRMP and provided public notice of that determination by publication in a newspaper of general circulation; and

WHEREAS, The Planning Department held a public scoping meeting on May 12, 2009 and May 14, 2009 in order to solicit public comment on the scope of the proposed Project's environmental review; and

WHEREAS, On August 31, 2011, the Planning Department published the Draft Environmental Impact Report ("DEIR") and provided public notice in a newspaper of general circulation of the availability of the DEIR for public review and comment and of the date and time of the Planning Commission public hearing on the DEIR; this notice was mailed to the Planning Department's list of persons requesting such notice; and

WHEREAS, On August 31, 2011, copies of the DEIR were mailed or otherwise delivered to a list of persons requesting it, to those noted on the distribution list in the DEIR, to adjacent property owners, and to government agencies, the latter both directly and through the State Clearinghouse; and

WHEREAS, Notice of Completion was filed with the State Secretary of Resources via the State Clearinghouse on August 31, 2011; and

WHEREAS, The Planning Commission held a duly advertised public hearing on said DEIR on October 6, 2011 at which opportunity for public comment was given, and public comment was received on the DEIR; the period for acceptance of written comments ended on October 31, 2011; and

WHEREAS, On April 27, 2012, the Planning Department opened a second public review and comment period for the DEIR, and provided public notice in a newspaper of general circulation of the availability of the second public review and comment period; this notice was mailed to the Planning Department's list of persons requesting such notice. The period for acceptance of written comments ended on June 11, 2012; and

WHEREAS, The Planning Department prepared responses to comments on environmental issues received at the public hearing and in writing during the first 61-day public review period and the second 45-day public review period for the DEIR, prepared revisions to the text of the DEIR in response to comments received or based on additional information that became available during the public review period, and corrected errors in the DEIR; and

WHEREAS, This material was presented in a Comments and Responses document, published on November 16, 2016, distributed to the Planning Commission and all parties who commented on the DEIR, and made available to others upon request at the Planning Department; and

WHEREAS, A Final Environmental Impact Report (hereinafter "FEIR") has been prepared by the Planning Department, consisting of the DEIR, any consultations and comments received during the review process, any additional information that became available, and the Comments and Responses document all as required by law; and

WHEREAS, Project EIR files have been made available for review by the Planning and Recreation and Park Commissions and the public, and these files are available for public review at the Planning Department at 1650 Mission Street, Suite 400, and are part of the record before the Commission; and

WHEREAS, On December 15, 2016, the Planning Commission reviewed and considered the information contained in the FEIR and found that the contents of said report and the procedures through which the FEIR was prepared, publicized, and reviewed comply with the provisions of CEQA, the CEQA Guidelines, and Chapter 31 of the San Francisco Administrative Code and certified the FEIR as adequate, accurate, and complete; and

WHEREAS, The Recreation and Park Commission has reviewed and consider the FEIR and the Mitigation Monitoring and Reporting Program (MMRP), (attached hereto as Attachment 2); now therefore be it

RESOLVED, That the Recreation and Park Commission adopts the CEQA findings, including a statement of overriding considerations, (attached hereto as Attachment 1) as though fully set forth herein; and be it

FURTHER RESOLVED, That the Recreation and Park Commission adopts the MMRP and imposes all mitigation measures contained therein as conditions of Project approval; and be it

FURTHER RESOLVED, That the Recreation and Park Commission approves the NRMP, which prescribes both general management activities that apply to all Natural Areas and management activities specific to each Natural Area, including, but not limited to habitat restoration, removal of invasive species, tree removal, erosion control, trail closure, relocation or creation, and closure or reduction of dog play areas.

Approved on December 15, 2016

_____

Recreation and Park Commission Secretary

WILD EQUITY INSTITUTE
474 VALENCIA ST. SUITE 295
SAN FRANCISCO, CA 94103

1479

11-8166/3210
09

DATE 1/17/17

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FOR SHARP PARK GOLF COURSE/SURVEY
FEE APPEAL

MP

Application to Request a
Board of Supervisors Appeal Fee Waiver

CASE NUMBER:
For Staff Use only

2017 JAN 17 AM 9:36

APPLICATION FOR Board of Supervisors Appeal Fee Waiver

1. Applicant and Project Information

APPLICANT NAME:	
Brent Plater	
APPLICANT ADDRESS:	TELEPHONE: (415) 349-5787
474 Valencia St., Suite 295, San Francisco, CA 94103	EMAIL: bplater@wildequity.org

NEIGHBORHOOD ORGANIZATION NAME:	
Wild Equity Institute	
NEIGHBORHOOD ORGANIZATION ADDRESS:	TELEPHONE: (415) 349-5787
474 Valencia St., Suite 295, San Francisco, CA 94103	EMAIL: info@wildequity.org

PROJECT ADDRESS:		
Significant Natural Resource Areas Management Plan		
PLANNING CASE NO.:	BUILDING PERMIT APPLICATION NO.:	DATE OF DECISION (IF ANY):
2005.0912E		12/15/16

2. Required Criteria for Granting Waiver

(All must be satisfied; please attach supporting materials)

☒ The appellant is a member of the stated neighborhood organization and is authorized to file the appeal on behalf of the organization. Authorization may take the form of a letter signed by the President or other officer of the organization.

☒ The appellant is appealing on behalf of an organization that is registered with the Planning Department and that appears on the Department's current list of neighborhood organizations.

☒ The appellant is appealing on behalf of an organization that has been in existence at least 24 months prior to the submittal of the fee waiver request. Existence may be established by evidence including that relating to the organization's activities at that time such as meeting minutes, resolutions, publications and rosters.

☒ The appellant is appealing on behalf of a neighborhood organization that is affected by the project and that is the subject of the appeal.

For Department Use Only

Application received by Planning Department:

By: _____ Date: _____

Submission Checklist:

- ☐ APPELLANT AUTHORIZATION
- ☐ CURRENT ORGANIZATION REGISTRATION
- ☐ MINIMUM ORGANIZATION AGE
- ☐ PROJECT IMPACT ON ORGANIZATION

☐ WAIVER APPROVED ☐ WAIVER DENIED

SAN FRANCISCO
PLANNING
DEPARTMENT

FOR MORE INFORMATION:
Call or visit the San Francisco Planning Department

Central Reception
1650 Mission Street, Suite 400
San Francisco CA 94103-2479

TEL: **415.558.6378**
FAX: **415.558.6409**
WEB: **http://www.sfplanning.org**

Planning Information Center (PIC)
1660 Mission Street, First Floor
San Francisco CA 94103-2479

TEL: **415.558.6377**
Planning staff are available by phone and at the PIC counter. No appointment is necessary.