

FILE NO. 150870

Petitions and Communications received from August 31, 2015, through September 4, 2015, for reference by the President to Committee considering related matters, or to be ordered filed by the Clerk on September 15, 2015.

Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information will not be redacted.

From the Office of the Controller, regarding Citywide Nonprofit Monitoring and Capacity Building Program, FY2014-2015 Annual Report. Copy: Each Supervisor. (1)

From the Office of the Controller, regarding ten organizations' compliance with Chapter 12G of the San Francisco Administrative Code by not using City funds for political activity for FY2013-2014. Copy: Each Supervisor. (2)

From California State Office of Historic Preservation, regarding National Register of Historic Places Nomination for San Francisco Art Institute. Copy: Each Supervisor. (3)

From Clerk of the Board, reporting that the following individuals have submitted Form 700 Statements: (4)

Joseph William Smooke - Legislative Aide - Leaving
Sheila Chung Hagen - Legislative Aide - Assuming

From Public Works, regarding Notices of Tentative Approval of Applications for Wireless Service Facility Site Permit at multiple addresses. (5)

From United States Department of the Interior, submitting Summary Edition of the final General Management Plan for Golden Gate National Recreation Area and Muir Woods National Monument. Copy: Each Supervisor. (6)

From California Public Utilities Commission, submitting notification letters for various Verizon Wireless facilities. Copy: Each Supervisor. (7)

From Patrick Monette-Shaw, regarding response to Civil Grand Jury on Strengthening Whistleblower Protection Ordinance. File Nos. 150602 and 150603. Copy: Each Supervisor. (8)

From concerned citizens, regarding proposed legislation urging the City and County of San Francisco to establish a memorial for "Comfort Women." File No. 150764. 5 letters. Copy: Each Supervisor. (9)

From San Francisco Bicycle Coalition, Walk San Francisco, and Livable City, comments regarding the proposed Transportation Sustainability Fee. File No. 150790. Copy: Each Supervisor. (10)

From Officers for Justice Peace Officers' Association, regarding proposed public service announcement for airing on KCBS Radio. Copy: Each Supervisor. (11)

From Patricia Van Steenberge, regarding disabled parking spaces. Copy: Each Supervisor. (12)

From Elaine Ervolino, regarding ban on live animal performances. Copy: Each Supervisor. (13)

From the Office of the Honorable Governor Jerry Brown, regarding appointment of Jim Wunderman to the Water Emergency Transportation Authority Board of Directors on August 31, 2015. Copy: Each Supervisor. (14)

From James Corrigan, regarding public restrooms at fire houses. Copy: Each Supervisor. (15)

From concerned citizens, regarding Critical Mass incident. 3 letters. Copy: Each Supervisor. (16)

From: Reports, Controller (CON)
Sent: Thursday, September 03, 2015 11:56 AM
To: BOS-Supervisors; Howard, Kate (MYR); SF Docs (LIB); Nemzoff, Judy (ART); Takayama, Robynn (ART); Conner, Brett (CHF); Rojas, Greg (CHF); Sacco, Carol (WOM); Einhorn, Duane (DPH); Moye, Laura (CHF); Long, Michelle (DPH); Zapien, Esperanza (HSA) (DSS); Cheu, Brian (MYR); Fong, Tracy (CFC) (CHF); Lee, Doris (MYR); Okamoto, Rey (ECN); Pascual, Merrick (ECN); Mason, Jane (SHF); CON-EVERYONE; MYR-ALL Department Heads; CON-Finance Officers
Subject: Issued: Citywide Nonprofit Monitoring & Capacity Building Program FY14-15 Annual Report

The Office of the Controller's City Services Auditor Division (CSA) today issued a report documenting the work of the Citywide Nonprofit Monitoring and Capacity Building Program in FY14-15. Nine City departments jointly monitored 127 nonprofit contractors on fiscal, compliance and governance standards. Among monitored nonprofits, 48% had initial findings – a 5% decrease from last fiscal year. Contractors corrected 42% of these findings prior to the close of the monitoring cycle. The most common types of findings related to cost allocation procedures and fiscal policies and procedures. Eight contractors had more than five unresolved findings. Seven contractors had one or more unresolved findings repeated from last year. No contractor was placed on Elevated Concern Status this year. Four nonprofit contractors received technical assistance in FY15 and an additional seven participated in the Bayview Nonprofit Capacity Building Project. Seven contractors are scheduled to receive technical assistance in FY16.

To view the full memorandum, please visit our Web site
at: <http://openbook.sfgov.org/webreports/details3.aspx?id=2197>
This is a send-only e-mail address.

For questions about the memorandum, please contact Laura Marshall (415) 554-7511

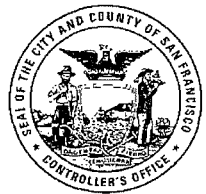
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City and County of San Francisco

Office of the Controller – City Services Auditor

CITYWIDE NONPROFIT MONITORING AND CAPACITY BUILDING PROGRAM

Fiscal Year 2014-15 Annual Report



September 3, 2015

Acknowledgements

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To learn about the Nonprofit Monitoring Program, please visit the Controller's Office website at <http://sfcontroller.org/nonprofits>.

For general information, please contact a member of the Nonprofit Monitoring Program at nonprofit.monitoring@sfgov.org.

CONTROLLER'S OFFICE CITY SERVICES AUDITOR

The City Services Auditor was created within the Controller's Office through an amendment to the City Charter that was approved by voters in November 2003. Under Appendix F to the City Charter, the City Services Auditor has broad authority for:

- Reporting on the level and effectiveness of San Francisco's public services and benchmarking the city to other public agencies and jurisdictions.
- Conducting financial and performance audits of city departments, contractors, and functions to assess efficiency and effectiveness of processes and services.
- Operating a whistleblower hotline and website and investigating reports of waste, fraud, and abuse of city resources.
- Ensuring the financial integrity and improving the overall performance and efficiency of city government.

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Monitoring Results Dataset: <http://openbook.sfgov.org/webreports/details3.aspx?id=2196>

Executive Summary

Each year, the City and County of San Francisco contracts with hundreds of nonprofit organizations to provide critical services, such as health, housing, job training, family support and others, throughout the City. The Citywide Nonprofit Monitoring and Capacity Building Program (Monitoring Program) consolidates contract monitoring requirements related to fiscal and organizational health for nonprofit contractors that receive funding from multiple City departments. This streamlined approach saves both City taxpayers and nonprofits time and money. The Monitoring Program specifically assesses nonprofit contractors in three broad areas of organizational health: Fiscal (e.g. Financial Reports, Audit, Fiscal Policies and Procedures, Agency-wide Budget and Cost Allocation Procedures); Compliance (e.g. Personnel Policies, Emergency Operations Plan, Americans with Disability Act, Sunshine Laws); and Governance Best Practices (e.g. board giving, board oversight, and board policies). The Monitoring Program also identifies nonprofit contractors in need of technical assistance or coaching, and provides consulting services at the City's expense to help those organizations improve their fiscal health and comply with City standards.

In Fiscal Year 2014-2015 (FY15), the Monitoring Program included 127 nonprofit providers with an aggregate of over \$330 million in City funding from nine departments. This Annual Report documents the FY15 monitoring results, discloses nonprofit contractors placed on "elevated concern" or "red flag" status (when applicable), and provides an overview of major program activities.

Monitoring Results Summary

- A total of 127 contractors participated in the monitoring pool in FY15, an increase of four contractors since last year.
- Initial "point in time" monitoring in FY15 resulted in 48% of contractors receiving one or more findings – a 5% decrease from last fiscal year. The remaining 52% did not receive any initial findings.
- Contractors addressed 42% of the 287 initial findings before the monitoring cycle closed in June 2015, on par with last fiscal year (at 41%).
- Contractors corrected compliance findings within the monitoring year at a much higher rate than fiscal findings – 57% of initial compliance findings were corrected compared to 36% of initial fiscal findings.
- Nine contractors had five or more uncorrected findings. Seven contractors had one or more unresolved findings repeated from last fiscal year. However, no contractor was placed on Elevated Concern Status on the basis of repeated findings this year. Five of the nine contractors with the most number of findings in FY15 are receiving consulting services to help bring them up to City standards.
- There has been a sustained decrease in monitoring findings over the past five years.

I. Citywide Nonprofit Monitoring and Capacity Building Program Overview

The Controller's Office coordinates the Monitoring Program for nonprofit organizations receiving multiple City contracts. The nine City departments currently participating in the Monitoring Program jointly conduct annual fiscal and compliance monitoring so that it is done efficiently and uses consistent standards and methods. The Monitoring Program has been in place since 2005 and in FY15 included 127 nonprofit providers with an aggregate of over \$330 million in City funding from participating departments.¹

The Monitoring Program identifies nonprofits in need of technical assistance or coaching, and provides consulting services at the City's expense to help those organizations improve their fiscal health and comply with City standards. In addition, trainings, peer learning, and forums to provide input are provided to City monitors through a series of topic-specific trainings and "All-Monitor Meetings." See Section 3 for details.

The standards that must be met by nonprofits contracting with the City and the documentation and steps that the City uses to test compliance with these standards are available on the Controller's website at <http://www.sfcontroller.org/nonprofits>. Every year, the Controller's Office trains both nonprofit contractors and City staff on how to meet the standards and generally improve financial and administrative management.

| FY15 City Departments Participating in the Monitoring Program | |
|---|---|
| ARTS | Arts Commission |
| First 5 | Children and Families Commission |
| DCYF | Department of Children, Youth and Their Families |
| DOSW | Department on the Status of Women |
| DPH | Department of Public Health |
| HSA | Human Services Agency |
| MOHCD | Mayor's Office of Housing and Community Development |
| OEWD | Office of Economic and Workforce Development |
| SHF | Sheriff's Department |

The Monitoring Program conducts a "point in time" assessment of contractors through fiscal and compliance standards that act as indicators of organizational health. City monitors conduct the assessment annually between October and March and issue "Monitoring Report Letters" after the assessment and then "Final Status" letters at the end of the monitoring cycle. Each standard that is not met during the monitoring site visit or desk review (called a "self-assessment") is considered a "finding." When this occurs, monitors provide the contractor with direction on how to meet the standard, and provide the contractor with the opportunity to do so within the monitoring cycle. The Monitoring Program also tracks governance activities as key indicators of organizational health; however, these indicators are considered "best practices" and thus not marked as findings if they are not met.

At the end of the monitoring cycle, City monitors record the final outcome for each contractor in a letter that describes the findings that have been corrected by the contractor and are now in conformance with City standards, as well as findings that must still be addressed by the nonprofit contractor. Per the Monitoring Program's Corrective Action Policy², contractors that do not adequately address findings from year to year may be labeled "unresponsive," which can lead to placement on Elevated Concern or Red Flag Status.

¹ See Program Results Dataset, Tab 2 for a full list of the nonprofits monitored under the Monitoring Program and the City departments who fund them: <http://openbook.sfgov.org/webreports/details3.aspx?id=2196>.

² Corrective Action Policy weblink: <http://www.sfcontroller.org/modules/showdocument.aspx?documentid=2824>

Changes to the Monitoring Standards in FY15

To prepare for the FY15 monitoring cycle, City departments made numerous revisions to the existing Standard Monitoring Form. These changes fall into the following categories:

- *Enhanced Clarity:* The City added additional language to an existing standard to clarify what should be measured or how it should be measured.
- *Strengthened Standards:* The City added new standards or additional testing of existing standards to address whether policies and procedures are in active use by contractors.
- *Increased Flexibility:* The City revised standards to make it easier for contractors to meet the threshold, or removed standards from Self-Assessment reviews.
- *Best Practices:* The City added new standards as “best practices” or indicators of financial health which will be tracked but will not count as findings.

The City added some of the strengthened standards on a pilot basis, to be tracked in FY15 and reviewed prior to potential full implementation in FY16.

A summary of the changes can be found in Appendix C.

II. FY15 Monitoring Results

FY15 Monitoring Pool

A total of 127 contractors participated in the monitoring pool in FY15, an increase of four contractors since last year. Departments granted one contractor a waiver from monitoring this year due to strong performance, in accordance with the Monitoring Program's waiver policy. The analysis below excludes four contractors due to scheduling delays.³ Additionally, two contractors had partial or no final status recorded.⁴ As a result, this analysis includes a total of 122 contractors.

The full set of monitoring results includes a list of the contractors in the FY15 monitoring pool and monitoring results, including initial findings and final status for each contractor. The FY15 dataset is available online.⁵

Trends in Initial "Point in Time" Findings

The initial "point in time" monitoring in FY15 resulted in 48% of contractors receiving one or more findings – a 5% decrease from last fiscal year's initial assessment (as shown in Figure 1).⁶ The remaining 52% did not receive any findings upon the initial point in time assessment. When looking at actual findings as a percentage of total possible findings, we see a similar downward trend for the fourth year in a row to 3.3%.

Figure 1:
% of Contractors with
Initial Findings

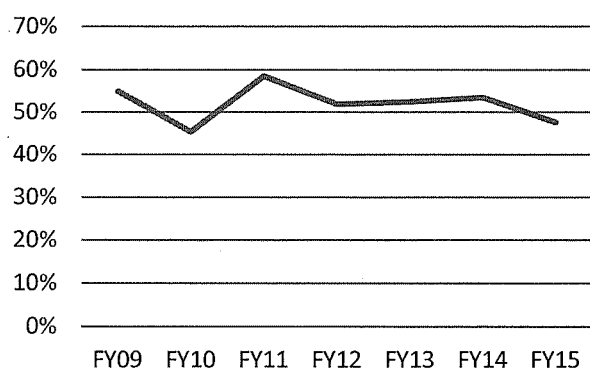
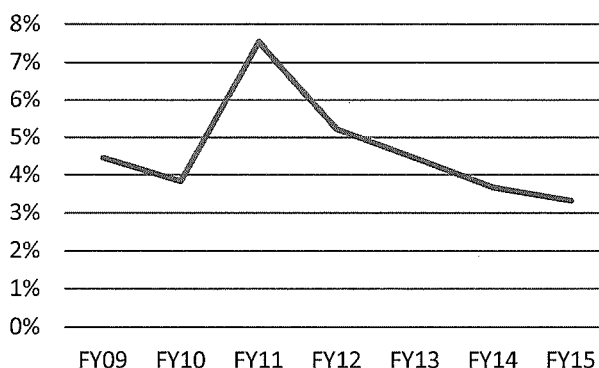


Figure 2:
Actual Findings as %
of Total Possible Findings



The trend may be a result of the Monitoring Program's training and technical assistance for nonprofits, with the goal of increasing clarity and guidance with monitoring requirements and skills-building for fiscal and organizational capacity.

³ Bay Area Legal Aid, Gum Moon Residence Hall, Mercy Housing California, San Francisco Conservation Corps

⁴ Veterans Equity Center (no final status recorded), Bayview Hunter's Point Foundation (partial status recorded)

⁵ <http://openbook.sfgov.org/webreports/details3.aspx?id=2196>

⁶ Note: This analysis excludes best practice and pilot findings.

Final Status of Findings at Close of Monitoring Cycle

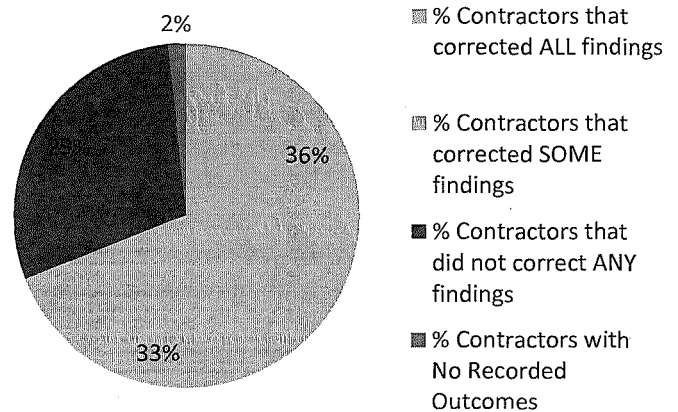
Beginning in FY14, the Monitoring Program began tracking how many findings were corrected by the end of the fiscal year.

In FY15, 36% of contractors with initial findings were able to correct all of their findings by the close of the monitoring year, while 33% of contractors corrected some of their findings and 29% were not able to correct any findings (see Figure 3).

As an aggregate, contractors addressed 42% of the total FY15 findings before the monitoring cycle closed in June 2015, on par with last fiscal year (at 41%).

See Appendix A for a list of contractors with no monitoring findings by the end of the fiscal year (contractors with no initial findings or that corrected all findings by the end of the monitoring cycle).

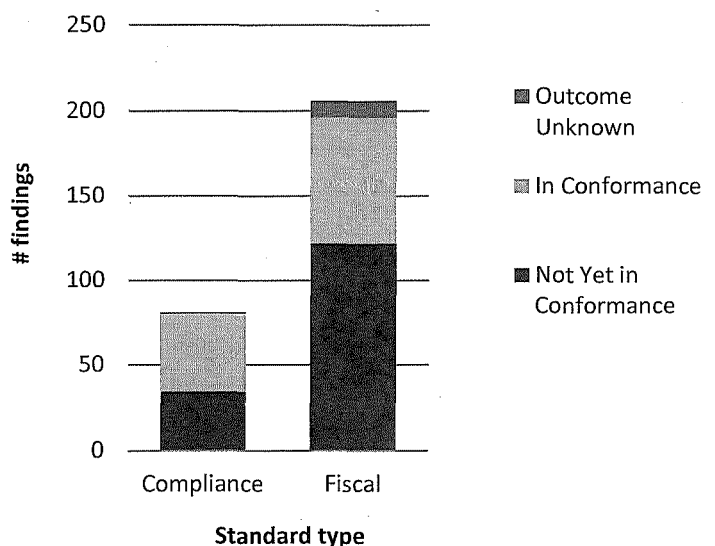
Figure 3: Final Status for Contractors



Final Status of Findings by Standard Type: Fiscal or Compliance

Approximately 75% of initial findings fell under fiscal standards, while the remaining 25% were compliance findings.⁷ Figure 4 illustrates the final status of fiscal and compliance findings. Contractors corrected compliance findings within the monitoring year at a much higher rate than fiscal findings – 57% of initial compliance findings (46 findings) were corrected compared to 36% of initial fiscal findings (74 findings).

**Figure 4:
Final Status for Fiscal and Compliance Findings**



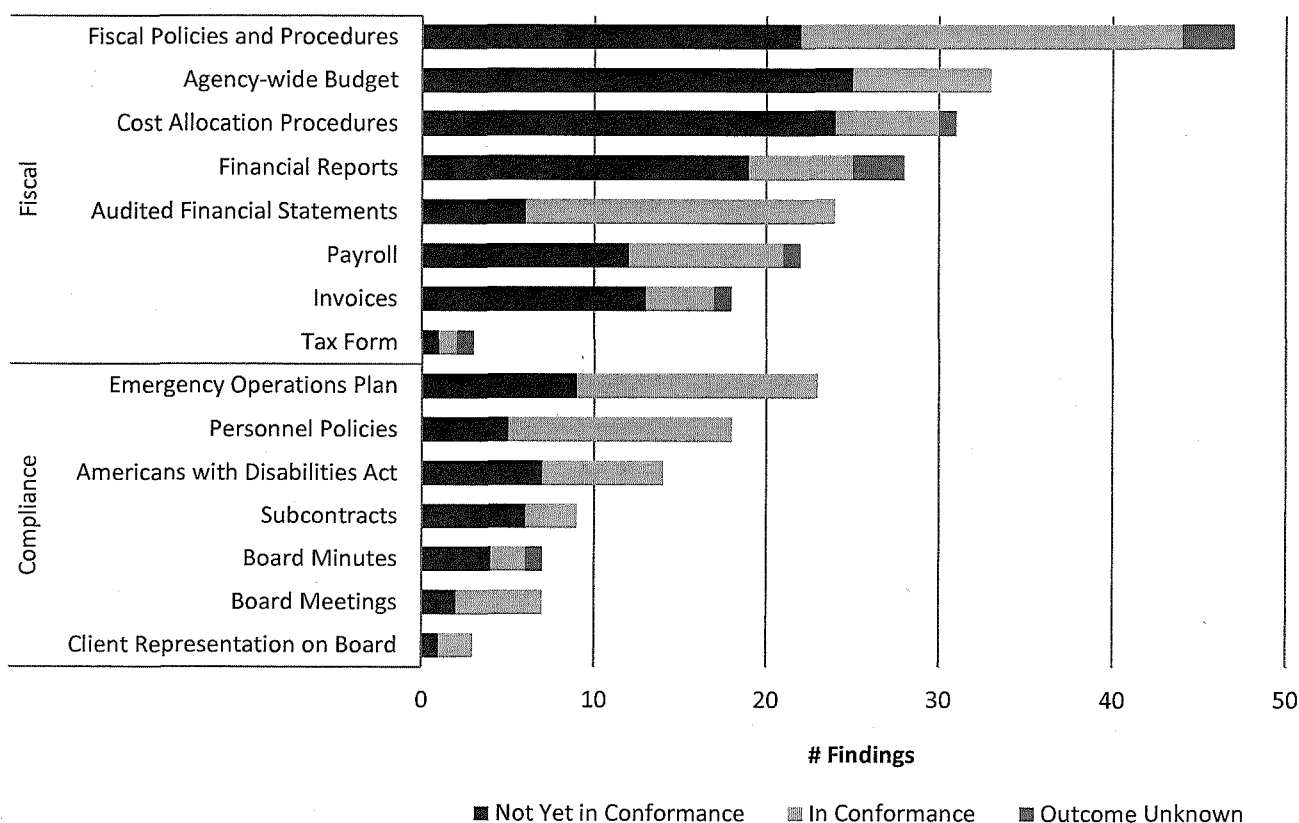
⁷ Note: this difference is due in part because there are over twice as many fiscal standards as there are compliance standards (48 versus 23 standards), compliance standards require less long-term or complex remedies to address noncompliance, and only half of the compliance standards (11 standards) are required to be assessed for desk reviews (self-assessments).

Final Status of Findings by Standard Category

Figure 5 shows the total number of findings broken down by the 18 fiscal and compliance categories that make up the monitoring standards.⁸ The chart shows the overall number of findings in each category, as well as the number of findings in each category that were corrected within the monitoring year (“in conformance”), findings that were not corrected (“not yet in conformance”), and findings for which the outcome was not recorded (“outcome unknown”).

Overall, contractors had the most findings in the areas of *Fiscal Policies and Procedures*, *Agency-wide Budget*, and *Cost Allocation Procedures*. While the *Fiscal Policies and Procedures* category had the largest number of initial fiscal findings, exactly half of these findings were corrected within the year (excluding unknown outcomes). Many of the other fiscal categories had lower rates of corrected findings, e.g. *Agency-wide Budget*, *Cost Allocation Procedures*, and *Financial Reports*. An example of a common finding in the *Cost Allocation Procedures* is being unable to show the “*Process for allocating shared program costs is consistent and reasonable*”. Some of these findings likely required longer-term work or an extended corrective action plan. For example, it may take time and technical assistance for a contractor to redesign its agency-wide budget to show allocation of shared and indirect costs by program. Amongst compliance findings, the *Emergency Operations Plans* category had the most findings both initially and at the close of the monitoring year.

Figure 5: Final Status by Standard Category



⁸ There were no findings in three categories: Public Access to Records, Licenses and DUNS.

Findings by Individual Standards: Initial Findings and Final Status

The following tables report the top ten fiscal and compliance standards with the highest number of findings, organized by the number of findings not yet in conformance. Results for fiscal findings show a large breadth, covering the five different fiscal standard categories below. The two standards focusing on cost allocation had the most number of uncorrected findings – 9 each, which is equivalent to 7% of total contractors for each standard. Initial compliance findings were spread across four categories; however were concentrated largely within the emergency operations plan (17 total) and American with Disabilities Act (14 total) categories.

Figure 6: Top Fiscal Findings

| Standard Category | Standard | # of Contractors with Findings Not Yet in Conformance | # of Contractors with Findings in Conformance | Final Outcome Unknown | Total Initial Findings |
|--------------------------------|--|---|---|-----------------------|------------------------|
| Agency-wide Budget | Shows allocation of shared and indirect costs by program | 9 | 1 | 0 | 10 |
| Cost Allocation Procedures | Process for allocating shared program costs is consistent and reasonable | 9 | 1 | 0 | 10 |
| Fiscal Policies and Procedures | Current (updated within the past two calendar years or to reflect monitoring/audit recommendations) and implemented | 8 | 3 | 1 | 12 |
| Financial Reports | Profit and Loss Statement: Shows year-to-date (YTD) income and expense by program/contract/ funding source, including indirect costs | 7 | 2 | 1 | 10 |
| Payroll | Timesheets: If employee time is paid by more than one source, it is recorded by funding source or program on timesheets | 7 | 4 | 0 | 11 |

Figure 7: Top Compliance Findings

| Standard Category | Standard | # of Contractors with Findings Not Yet in Conformance | # of Contractors with Findings in Conformance | Final Outcome Unknown | Total Initial Findings |
|---------------------------------|---|---|---|-----------------------|------------------------|
| Personnel Policies | Written and current personnel/employee manual, including: Equal Employment Opportunity; Harassment and Discrimination; Reasonable Accommodation (ADA); Grievance Procedures | 5 | 2 | 0 | 7 |
| Emergency Operations Plan | Staff and volunteers were trained within the last year on the emergency plan | 4 | 4 | 0 | 8 |
| Americans with Disabilities Act | Written policies and procedures to allow people with disabilities to benefit from services and containing an agency-wide ADA grievance procedure | 4 | 1 | 0 | 5 |
| Emergency Operations Plan | At least one fire drill and one earthquake drill have been conducted in last year | 4 | 5 | 0 | 9 |
| Americans with Disabilities Act | Staff is trained regarding Contractor's ADA policies and procedures | 3 | 6 | 0 | 9 |

Governance Best Practices

In addition to the fiscal and compliance monitoring standards, the City assesses governance practices through a "Governance Review Checklist". Because these standards are considered best practices, they are not part of the findings analysis, nor are included in the determination of elevated concern or red flag status. Contractors are not required to come into conformance with these best practices, but are encouraged to adopt them over time as part of a strong organizational governance structure.

Twenty-one contractors (17% of contractors) did not follow one or more governance best practices. A total of 40 findings spanned the different best practices outlined in Figure 8 below. This is a large increase from last fiscal year, where just six contractors received a total of 17 findings. (This increase may be a result of increased attention and training in FY15 on actually completing the Governance Review Checklist to gain more insight into organizational health.)

In FY15, the City added a new best practice in the governance checklist in order to promote the development of a Board Manual documenting the Board's practices. Eight contractors did not have a board manual, the highest number among all of the governance best practices. Another new best practice added in FY15 is whether a "conflict of interest policy exists" – which was not practiced by four contractors.

Figure 8: Governance Best Practice Findings

| Governance Best Practices | # of findings |
|---|----------------------|
| Agency has a Board Manual | 8 |
| Board conducts an Executive Director performance review annually | 7 |
| Board leadership positions are filled | 6 |
| Quorum is achieved at every meeting | 5 |
| Conflict of interest policy exists | 4 |
| Board participates in annual giving to agency | 4 |
| Board assists with the raising of funds | 3 |
| Bylaws define term limits, quorum, committee structures, and voting/decision-making process | 2 |
| Agency conducted board recruitment at least once in the past year | 1 |
| TOTAL | 40 |

New FY15 Best Practice and Pilot Standards

The Monitoring Program added a number of new best practice and pilot standards in FY15, as described in the Program Overview section. Because these standards are considered pilots or best practices, they are not part of the findings analysis, nor are included in the determination of elevated concern or red flag status. Contractors were not required to come into conformance with these standards, but were encouraged to adopt them as part of a strong fiscal and organizational structure over time.

Eighty-six contractors (70% of all contractors) did not meet one or more of the new FY15 pilot and best practice standards. A total of 178 findings spanned these standards outlined in Figure 9 below.

At the top of the list, 41 contractors (34% of all contractors) did not incorporate a cash flow projection into their agency-wide budget. Thirty-eight contractors (31%) did not maintain at least 60 days of operating cash

and 35 (29%) did not maintain a positive cash flow over three years, as the table shows. These results are perhaps not surprising, since FY15 was first year the City assessed these standards through the Monitoring Program and there may be some data accuracy or other issues, as monitors and contractors adjust to the standards. However, these pilot findings may indicate serious financial challenges if substantiated in future years.

Figure 9: Pilot and Best Practice Findings

| Pilot and Best Practice Standards | # of Contractors with Finding | % of Total Contractors with Finding |
|---|--------------------------------------|--|
| Agency-wide Budget | | |
| g. Includes annual cash flow projections | 41 | 34% |
| Audited Financial Statements | | |
| e. Audit approved by Board of Directors within six months of the close of the contractor's fiscal year | 35 | 29% |
| k. [Cash Flow] Total change in cash is positive over 3 consecutive years or agency has a reasonable explanation and/or plan to reverse cash outflow | 35 | 29% |
| l. In current audit, cash flow from operations is positive | 22 | 18% |
| m. In current audit, agency has at least 60 days of operating cash | 38 | 31% |
| Public Access to Records | | |
| a2. Contractor has a written Sunshine policy | 6 | 5% |
| Subcontracts | | |
| d. Monitoring of subcontracts where services are provided to clients (i.e., not vendor or consultant subcontracts) included an assessment of standards 7a., 7b. and 7c. on this Monitoring Form | 1 | 1% |
| Total | 178 | |

Contractors with the Most Findings in FY15

A high number of findings or repeated findings can signal potential instability in the organizational and financial health of a nonprofit – and ultimately an organization's ability to provide effective and sustainable services to residents in need. Through the annual monitoring process, City staff identify contractors struggling to meet the monitoring standards, so they can receive support through one-on-one technical assistance, coaching and training to resolve findings.

Figure 10 shows a list of contractors with five or more findings that were not brought into conformance by the end of the monitoring year.⁹ Of these contractors, one received technical assistance in FY15 and four are scheduled to receive technical assistance in FY16 as a result of this year's monitoring. *Cost allocation procedures* were the most common category of unresolved findings for these contractors. *Agency-wide budget and fiscal policies and procedures* came in as the second and third highest categories of unresolved findings.

⁹ As noted previously, findings have not been determined for the following contractors, thus they are not included in this analysis: Bay Area Legal Aid, Gum Moon Residence Hall, Mercy Housing California, and San Francisco Conservation Corps. Final status was not determined for Veterans Equity Center (8 initial findings), thus is also not included in this analysis.

The single highest uncorrected finding was that six of the nine contractors below did not allocate shared and indirect costs by program in their agency-wide budgets.¹⁰

Figure 10: Contractors with the Most Findings

| Contractor Name | # Findings Not Yet in Conformance | # Findings In Conformance |
|---|--------------------------------------|------------------------------|
| Mental Health Association of SF** | 19 | 2 |
| Renaissance Parents of Success** | 19 | 3 |
| Bernal Heights Neighborhood Center | 16 | |
| Brava Theater Center | 10 | |
| Potrero Hill Neighborhood House** | 9 | 3 |
| African American Art and Culture Complex* | 8 | 8 |
| Mission Language and Vocational School** | 8 | |
| Homeless Children's Network | 8 | |
| Good Samaritan Family Resource Center, Inc. | 5 | |

* Received technical assistance in FY15

** Scheduled to receive technical assistance in FY16

Contractors with Repeated Findings between FY14 and FY15

Repeated findings (i.e., not meeting a standard or correcting a finding two years in a row) are important indicators of noncompliance with monitoring standards. Per the Monitoring Program's Corrective Action Policy¹¹, contractors that do not adequately address findings from year to year may be labeled "unresponsive," which can lead to placement on Elevated Concern Status.

After assessing the types and amounts of repeated findings in FY15, the City will not place any contractor on Elevated Concern status based on repeated findings.

Figure 11 below lists the seven contractors with one or more repeated findings between FY14 and FY15, listed in order of greatest to least number of repeated findings. Of these contractors, one received technical assistance in FY15. See Appendix B to view the specific findings that were repeated.

This is the first year the Monitoring Program has been able to determine repeated findings based on the *final status* instead of initial findings. As a result, previous annual reports showed much higher numbers of contractors with repeated findings, e.g. 18 contractors with repeated *initial* findings in FY14 compared to seven contractors in FY15. Consistent with the past, most of the repeated findings were in fiscal categories: Cost Allocation Procedures, Agency-wide Budget, and Fiscal Policies and Procedures.

¹⁰ See the dataset for the complete list of findings for all contractors:

<http://openbook.sfgov.org/webreports/details3.aspx?id=2196>

¹¹ Corrective Action Policy weblink: <http://www.sfcontroller.org/modules/showdocument.aspx?documentid=2824>

Figure 11: Contractors with Repeated Findings between FY14 and FY15

| Contractor Name | # of Repeated Findings | Finding Categories |
|---|------------------------|---|
| African American Art and Culture Complex* | 4 | Cost Allocation Procedures |
| APA Family Support Services | 2 | Personnel Policies Americans with Disabilities Act |
| Bayview Hunters Point Foundation for Community Improvement* | 2 | Agency-wide Budget Cost Allocation Procedures |
| Brava for Women in the Arts | 2 | Agency-wide Budget Fiscal Policies and Procedures |
| Nihonmachi Legal Outreach | 2 | Financial Reports |
| Arab Cultural and Community Center | 1 | Personnel Policies |
| Eviction Defense Collaborative | 1 | Agency-wide Budget |

* Received technical assistance in FY15

In prior years, the standards in Figure 12 were found to result in repeated findings by numerous contractors. As a result, the Monitoring Program revised its Standard Monitoring Form to account for the fact that these standards were difficult for contractors to address within a year's time.

For example, acquiring a target level of funding from non-City sources can be difficult for many contractors whose primary business model includes providing City-funded services. As a result, the City changed the criteria to accept fundraising *efforts* towards this goal as meeting the standard. Similarly, achieving a two-to-one ratio of assets to liabilities is challenging for nonprofits, as it requires raising unrestricted revenue to build reserves. To be more responsive to meeting basic industry standards, the City lowered the threshold, allowing contractors to demonstrate sufficient assets to cover their liabilities (i.e., a one-to-one ratio).

The result of these changes was a significant drop in repeated findings for these two standards, as shown in Figure 12. For example, the overall number of uncorrected findings for the working capital ratio standard dropped by approximately half since last fiscal year.

Figure 12: Change from FY14 to FY15 in Repeated Findings for Revised Standards

| Category | FY14 Standard | # of Repeated Findings | FY15 Revised Standard | # of Repeated Findings |
|---------------------------|--|------------------------|--|------------------------|
| Agency-wide Budget | f. 15% of funding from non-City sources | 9 | f. 15% of funding from non-City sources or agency can demonstrate non-City fundraising efforts | 2 |
| Financial Reports | c. Current assets exceed current liabilities by 2 to 1 | 4 | b. Working capital ratio is greater than 1 | 0 |

III. Technical Assistance, Coaching, and Trainings

Technical Assistance

In an effort to help contractors correct their findings and improve their overall operations, the Controller's Office provides coaching and technical assistance to City-funded nonprofits. These services have been provided through a long-term partnership with CompassPoint Nonprofit Services, an organization with broad professional and community experience in nonprofit management. In FY 15, the Controller's Office broadened its pool of technical assistance providers and trainers through a new request for proposals, and, as a result, pre-qualified additional vendors to assist in the following service areas: (1) Nonprofit Fiscal Management; (2) Nonprofit Governance; (3) Nonprofit Fundraising and Board Development; (4) Strategic Planning and Evaluation; (5) Fiscal Agency and Management Service Organization Services; and (6) Contract Administration and Compliance.

The City has since entered into contracts with Fiscal Management Associates, Northern California Community Loan Fund and Social Policy Research Associates to provide technical assistance, trainings and coaching for both City monitors and City-funded nonprofit contractors.

During FY15, the following contractors received technical assistance:

1. African American Arts and Cultural Complex
2. Booker T. Washington Community Service Center
3. Collective Impact
4. Gum Moon Residence Hall

The technical assistance focused on fiscal issues: improving financial statements, implementing cost allocation procedures, developing City-compliant budgets, clarifying fiscal policies and procedures, and strengthening fiscal management and oversight.

Following FY15 monitoring, City monitors referred the following contractors for technical assistance (to occur mostly in FY16):

1. Community Living Campaign
2. Community Technology Network
3. Mental Health Associates of San Francisco
4. Mission Language & Vocational Services
5. Mission Neighborhood Center (ongoing from FY14)
6. Potrero Hill Neighborhood House
7. Renaissance Parents of Success

The Controller's Office and technical assistance providers met with these contractors and developed action plans in the areas of: budgeting cost allocation procedures, fiscal policies and procedures, financial reporting, structure of the finance function, accounting systems, and overall financial sustainability.

Bayview Nonprofit Capacity Building Project

Building on previous neighborhood-based capacity building projects, the Controller's Office and a multi-departmental Steering Committee launched the Bayview Nonprofit Capacity Building Project in FY14. The project, continuing into FY15, provided technical assistance, coaching, and training to selected nonprofits serving Bayview residents. By strengthening organizational infrastructure, the project aimed to increase each nonprofit's capacity to serve vulnerable Bayview residents.

The project focused on Bayview-serving nonprofit organizations that receive City funding. The amount and duration of assistance varied depending on the needs of participating organizations. Thirteen nonprofits applied to the program. The Project Steering Committee selected seven nonprofits to participate (all but one was in the "joint monitoring pool" in FY15):

- Bayview Hunters Point Foundation for Community Improvement
- Bayview Hunters Point Multipurpose Senior Services
- Bayview Opera House
- Black Coalition on AIDS
- Hunters Point Family
- Old Skool Café (not in the Monitoring Program)
- San Francisco Housing Development Corporation

In partnership with CompassPoint Nonprofit Services, these seven contractors received support in FY14 and FY15 on such critical topics as budgeting, cost allocation plans, financial systems improvement, board development, fundraising, and staff leadership. Although the needs of each organization differed, participating nonprofits reported in a post-project evaluation survey that the technical assistance project was beneficial to their organization, that they achieved their intended outcomes, and that they would recommend this program to other nonprofits with whom they work. Most organizations spent between 50 and 60 hours on technical assistance and identified future goals that could benefit from additional services.

The major accomplishments of participating contractors included: navigating a successful leadership transition; planning a programmatic merger; building executive leadership capacity and board engagement; gaining a shared understanding of board and staff roles; increasing leadership's understanding of best practices in budgeting; and shifting board culture around financial management and fiscal oversight.

Some contractors noted that the City could have provided additional trainings and check-in meetings, especially those related to the theory of change, to help staff realize long-term goals and the connection to the organization's programs. Another suggestion was to develop best practices and guidelines as a resource, in coordination with the consultant, to provide suggested standardized procedures for contractors.

The main challenge that participating contractors reported was not having enough time internally to dedicate to the capacity building efforts. Since these were smaller nonprofit organizations doing dynamic work, gathering internal resources and dedicating them to the technical assistance effort was a challenge for most. The consultant identified similar resource and scheduling challenges as well as change management concerns about transitions to new systems and staff changes. Despite these challenges, participants found the technical assistance beneficial to the organization as a whole and for participating staff member's professional development.

Spring 2015 Nonprofit Training Series

Each year, the Controller's Office organizes a Spring Training Series for contractors in the Nonprofit Monitoring Program pool. In FY15, the Controller's Office again surveyed contractors to assess interest and need, and revised the training offerings accordingly. Partnering with CompassPoint Nonprofit Services, the Controller's Office offered three workshops during the spring of 2015: (1) Building Better Budgets, (2) Strategy Formation for Sustainability and Impact, and (3) Engaging your Board in Governance and Fundraising. Fifty-one nonprofits participated in at least one workshop, with 68 total participants (duplicated) at the three sessions. In the evaluation forms, participants overwhelmingly rated the workshops either "excellent" or "very good".

Fall 2014 City Monitor Training Series

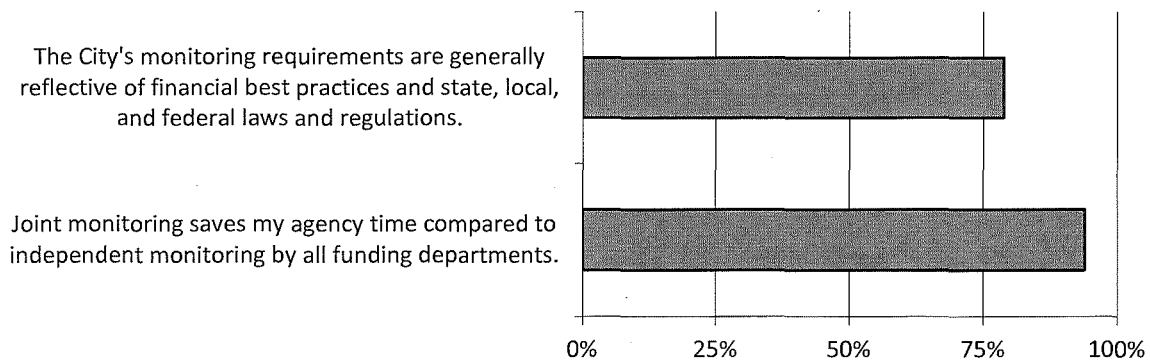
Each year, the Controller's Office also organizes a Fall Training Series for City monitors participating in the Monitoring Program. In FY15, the Controller's Office again surveyed City monitors to assess capacity building need, and revised the training offerings accordingly. Partnering with CompassPoint Nonprofit Services, the Controller's Office offered four workshops during the fall of 2014: (1) Monitoring 101, (2) Budgets, Financial Statements, and Fiscal Policies and Procedures, (3) Cost Allocation, Timesheets & Invoices: BASIC, and (4) Cost Allocation, Financial Statements, & Audits: ADVANCED. Eight-eight people attended the training series in total, nearly evenly split among the four workshops. Overall, attendees were pleased with the workshop content and instructors and they particularly appreciated the real life examples and hands-on group work.

IV. Program Performance Measures

The Controller's Office evaluates the Citywide Nonprofit Monitoring and Capacity Building Monitoring Program using a variety of process and satisfaction measures derived from year-end surveys of City monitors and contractors. The Controller's Office also evaluates whether monitors adhered to Monitoring Program guidelines. Trends for all performance measures can be found in Appendix D. Full results of the surveys are included in Appendix E.

The Monitoring Program has many goals, but of particular interest to the Controller's Office is whether the program is efficient (i.e., it saves time) and whether it is effective (i.e., it monitors the right standards). The survey of contractors provided the following feedback about these two areas.

Figure 13: Percent of Contractors that Agree or Strongly Agree with the Following General Statements about the Program (n=33)



With 94% of respondents agreeing that the Monitoring Program saves them time compared to individual monitorings by each department, it's clear that the process is efficient for the contractors. A lower percentage of respondents (79%) indicated that the standards are reflective of best practice for the industry. The Controller's Office will continue in its efforts to ensure that the program standards are consistent with regulations and are effective at illustrating the fiscal health of the City's service providers. To that end, the Controller's Office sought specific feedback about the City's standards from contractors, and their responses have been summarized in Appendix E.

Appendices

| | |
|---|---|
| A. List of Contractors with No Monitoring Findings | 2 |
| B. Repeated Findings between FY14 and FY15 by Contractor | 3 |
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| E. City Monitoring Staff and Contractor Annual Program Survey Results | 8 |

APPENDIX A: Contractors with No Findings in FY15

Eighty-five contractors (70%) had no findings at the end of the FY15 monitoring year. This includes 23 contractors (18%) that had no initial findings, 21 contractors (17%) that corrected all initial findings by the end of the monitoring year, and 41 contractors (34%) who received only pilot or best practice findings.

- AIDS Legal Referral Panel of the SF Bay
- Arriba Juntos - IAI
- Asian Americans Advancing Justice - Asian Law Caucus
- Asian Neighborhood Design
- Asian Women's Shelter
- AspiraNet
- Bay Area Community Resources
- Bay Area Video Coalition
- BAYCAT
- Bayview Hunters Point Multipurpose Senior Services
- Black Coalition on AIDS
- Catholic Charities CYO
- Center on Juvenile and Criminal Justice
- Central American Resource Center
- Central City Hospitality House
- Charity Cultural Services Center
- Children's Council of San Francisco
- Chinatown Community Development Center
- Community Housing Partnership
- Community Initiatives
- Community Works
- Community Youth Center of San Francisco
- Compass Family Services
- Conard House Inc
- Dolores Street Community Services
- Donaldina Cameron House
- FACES-SF
- Filipino American Development Foundation
- First Place for Youth
- Friendship House Association of American Indians
- Glide Foundation
- Goodwill Industries of SF, San Mateo and Marin
- Hamilton Family Center, Inc
- HealthRight 360
- Homeless Prenatal Program
- Huckleberry Youth Programs
- Hunters Point Family
- Independent Living Resource Center of San Francisco
- In-Home Supportive Services Consortium
- Instituto Familiar de La Raza, Inc.
- Japanese Community Youth Council
- Jewish Family and Children's Services
- Jewish Vocational Service
- Justice and Diversity Center-SF Bar Association
- La Casa de las Madres
- La Raza Centro Legal
- Larkin Street Youth Center
- Lavender Youth Recreation and Information Center
- Legal Assistance to the Elderly
- Legal Services for Children
- Lutheran Social Services of Northern California
- Mission Economic Development Agency
- Mission Hiring Hall
- Mission Housing Development Corporation
- Mission Neighborhood Centers, Inc.
- Mission Neighborhood Health Center
- Mission SF Community Financial Center
- Mt St Joseph-St Elizabeth
- Mujeres Unidas y Activas
- North Of Market Senior Services DBA Curry Senior Center
- Northern California Presbyterian Homes
- Performing Arts Workshop
- Portola Family Connections
- Positive Resource Center
- Prevent Child Abuse California
- Providence Foundation of San Francisco
- Richmond Area Multi-Services Inc (RAMS)
- Richmond District Neighborhood Center
- San Francisco Child Abuse Prevention Center
- San Francisco LGBT Community Center
- San Francisco Network Ministries
- San Francisco Study Center
- Seneca Center
- Southeast Asian Community Center
- Special Service for Groups
- St. Vincent de Paul
- Success Center SF
- Sunset District Community Development (Sunset Youth Services)
- Swords to Plowshares Veterans Rights Organization
- Tenderloin Housing Clinic, Inc.
- The Arc Of San Francisco
- Toolworks Inc
- Vietnamese Youth Development Center
- Westside Community Mental Health Services
- YMCA of San Francisco

APPENDIX B: Repeated Findings between FY14 and FY15 by Contractor

African American Art and Culture Complex*

Cost Allocation Procedures:

- a. Cost allocation procedures and plan for shared costs is documented in a written narrative or in the footnotes of the current approved agency-wide budget
- b. Process for allocating shared program costs is consistent and reasonable
- c. Process for cost allocation procedures and plan for indirect costs is documented in a written narrative or in the footnotes of the current approved agency-wide budget
- d. Process for allocating indirect costs is consistent and reasonable

APA Family Support Services

Americans with Disabilities Act (ADA):

- a. Written policies and procedures to allow people with disabilities to benefit from services and containing an agency-wide ADA grievance procedure

Personnel Policies:

- a. Written and current personnel/employee manual, including: Equal Employment Opportunity; Harassment and Discrimination; Reasonable Accommodation (ADA); Grievance Procedures

Bayview Hunters Point Foundation for Community Improvement*

Agency-wide Budget:

- f. 15% of funding from non-City sources or agency can demonstrate non-City fundraising efforts

Cost Allocation Procedures:

- b. Process for allocating shared program costs is consistent and reasonable

Brava Theater Center

Agency-wide Budget:

- c. Shows allocation of shared and indirect costs by program

Fiscal Policies and Procedures:

- b. Internal controls (safeguarding of assets, authorization of transactions, reconciliation of accounting records) [documented and demonstrated]

Nihonmachi Legal Outreach

Financial Reports:

- c. Balance Sheet: Current bank reconciliation (as of the last 4 months, at least)
- e. Profit and Loss Statement: Shows year-to-date (YTD) income and expense by program/ contract/ funding source, including indirect costs

Arab Cultural and Community Center

Americans with Disabilities Act (ADA):

- a. Written policies and procedures to allow people with disabilities to benefit from services and containing an agency-wide ADA grievance procedure

Eviction Defense Collaborative, Inc.

Agency-wide Budget:

- f. 15% of funding from non-City sources or agency can demonstrate non-City fundraising efforts

* Received technical assistance in FY15

Appendix C: Changes to the FY14-15 Standard Monitoring Form

In FY15, City departments made numerous revisions to the existing Standard Monitoring Form categorized in the following ways:

- **Strengthened Standards:** The City added new standards or additional testing of existing standards to address whether policies and procedures are in active use by contractors. Some of the strengthened standards were added on a “pilot” basis, to be tracked in FY15 and fully implemented in FY16. Piloted standards have been indicated below.
- **Best Practices:** The City added new “best practices” or indicators of financial health, which will be tracked but will not count as findings.
- **Increased Flexibility:** The City revised certain standards to make it easier for contractors to meet the threshold, and eliminated some standards from Self-Assessment reviews to decrease the time burden.
- **Enhanced Clarity:** The City included additional language to existing standards to clarify what should be measured or how it should be measured.

| Strengthened Standards | |
|--|---|
| Standard | Intent |
| 1b. Budget must show income and expense by program AND funding source | Budgets must show how each programs income and expenses are balanced, as well as how each source of funding is being spread throughout the agency. |
| 1g. Budget includes annual cash flow projections [pilot] | Cash flow projections help an agency understand how its funds will be used month by month, highlighting areas of potential deficit to be addressed early. |
| 2e. Cost allocation procedures match actual cost allocation found in agency-wide budget and financial documents | Where previous monitoring asked contractors to provide their plan for allocation, this new standard tests that the plan is in use. |
| 3c. No material weaknesses mentioned or going concern stated in the notes to the financial statements | This has been a standard for A-133 audits, and is relevant for standard audits as well. Material weaknesses represent a potential risk for City funds. |
| 3e. Audit approved by Board of Directors within 6 months of the close of the contractor’s fiscal year [pilot] | This new standard asks that contractors complete an audit in a timely manner as an indicator of contractor's ability to contemporaneously maintain its accounting records and adequately document accounting transactions. Presentation to the board within 6 months of the close of the year demonstrates the agency has complied. |
| 3k. New testing on Statement of Cash Flows (audit): total change in cash is positive over 3 years or there is a reasonable explanation [pilot] | While other standards related to financial statements look at a point in time, this standard provides monitors with trend data about a contractor’s cash position and financial health. |
| 5b-g. Internal controls checklist | Where previous monitoring simply asked contractors to have fiscal policies and procedures in a variety of areas, the new use of a checklist will test whether these policies are in active use by the agency. |
| 11. Contractor has a written policy on Sunshine Ordinance [pilot] | Previously, contractors needed to verbally attest that they followed the Sunshine Ordinance when required. The new standard asks contractors to have a written policy to this effect. |
| 13d. Monitoring of subcontracts where services are provided to clients include an assessment of standards 7a., 7b., and 7c. on the Standard Monitoring Form (Invoices section) [pilot] | Where previous monitoring asked that contractors conduct their own monitoring of subcontractors, this new standard creates a minimum threshold for that monitoring, namely that it include a review and testing of invoices. |

| Best Practices | |
|---|---|
| Standard | Intent |
| 3l. Cash flow from operations is positive | Items l. and m. are best practices used to support analysis regarding the contractor's financial health, as these standards may indicate problems elsewhere. Net cash provided by operating activities should be positive. If not, it may mean the organization is relying on debt or investments to fund its day to day operations |
| 3m. Agency has at least 60 days of operating cash | Maintaining at least 60 days of operating cash is important for financial stability so that a contractor can cover payroll and other expenses, should reimbursements or other expected revenue be delayed. |
| 19i. Conflict of Interest policy exists | This item has been added to the Board of Directors Best Practices section. |
| 19j. Agency has a Board Manual documenting the best practices described here | This item has been added to the Board of Directors Best Practices section. |
| Increased Flexibility | |
| Standard | Intent |
| 1b. 15% funding from non-City sources, or contractor can demonstrate non-City fundraising efforts | While some agencies may not be able to reach the 15% threshold for non-City funds, letters of intent, board fundraising committee minutes, or other documents can demonstrate efforts to expand funding beyond City sources. |
| 6b. Working capital ratio is greater than 1 | In prior monitoring, the assets to liabilities ratio was required to be 2 to 1. This standard (re-named "working capital ratio") lowers the threshold to ask that contractors simply have enough assets to cover their liabilities. |
| 18a. Demonstration of registered DUNS number if contractor receives federal or state funds | This clarification aligns the standard to the actual federal requirement. |
| Items Removed from Self-Assessment: 8d-g. Payroll – Timesheets 12. Client Representation on Board 13. Subcontracts 14. Licenses 15. Personnel Policies 16. Emergency Operations Plan 17. ADA 18. DUNS | Unless an agency has a prior year finding in one of the standards listed, it will not be required to monitor these items in a self-assessment. |
| DELETED: Overall cash balance is positive | This standard did was replaced by more indicative standards using the Statement of Cash Flows: |
| DELETED: Elevator permit is current | This standard was determined to be outside the purview of this monitoring. |
| DELETED: All sites have received fire inspection | This standard was determined to be outside the purview of this monitoring. |
| Enhanced Clarity | |
| Standard | Intent |
| 8e. Employee and supervisor signatures on timesheets in ink (e-timesheets are acceptable, with demonstration or verification of e-signature, or written procedures about how e-timesheets are signed) | Prior timesheet review allowed for e-timesheets, but provided no guidance on how to certify signatures. |
| 8f. All changes to timesheet are initialed by supervisor and employee in ink (e-timesheets are acceptable with demonstration or verification of the approval process for changes, or written procedures about how e-timesheets are changed) | Prior timesheet review allowed for e-timesheets, but provided no guidance on how to certify changes to the timesheets. |

| | |
|--|---|
| 9d. Minutes show that financial reports are shared with the Board (or finance committee) at least quarterly, or more regularly when financial concerns warrant it | The previous standard stated that reports were shared “regularly.” The new standard provides guidance on how frequently financial reports should be shared. |
| 13a. Documentation that procurement procedures (and/or the process for entering into legal agreements) in the Contractor’s fiscal policies and procedures were followed by the Contractor to select subcontractors | Contractors may not always “procure” subcontracted services. They may enter into an MOU with a partner to apply for a contract jointly. In these cases, the practices for entering into that legal agreement should be spelled out in the policies (e.g., approval by the Board required, etc.), and the contractor must demonstrate that the policies were followed. |
| 13c. Documentation that contractor regularly monitors fiscal and programmatic performance of subcontractors providing direct services to clients | This monitoring does not require contractors to carry out fiscal and programmatic monitoring of vendors such as consultants. Instead, only subcontracts where direct services are provided to clients should be monitored. |

APPENDIX D: Performance Measures

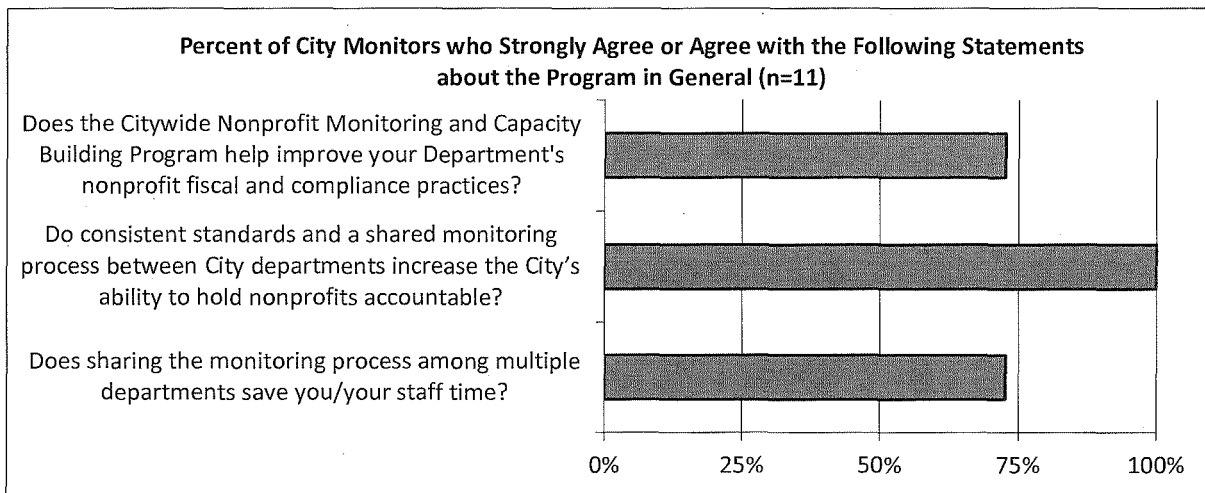
| Measure Number | Category | Measure | Target | FY12 Actual | FY13 Actual | FY14 Actual | FY15 Actual |
|----------------|---|--|--------|-------------|-------------|-------------|-------------|
| 1 | Monitoring Team Feedback | % of Monitoring Team respondents who state their monitoring teams worked well together always or most of the time | 95% | 100% | 100% | 77% | 80% |
| 2 | Lead Department Representative Feedback | % of Lead Department Representatives reporting that they were always or most of the time confident about their findings | 95% | 95% | 90% | 89% | 89% |
| 3 | Lead Department Representative Feedback | % of Lead Department Representatives who felt they had adequate support, tools, and training to perform their responsibilities always or most of the time | 95% | 89% | 80% | 78% | 78% |
| 4 | Monitoring Processes | % of monitorings are scheduled in the online calendar by December 15, 2012 | 95% | 91% | 87% | 94% | 97% |
| 5 | Monitoring Processes | % of the year's Monitoring Report Letters sent to the contractor/ posted to centralized repository within the deadline | 80% | 67% | 75% | 88% | 84% |
| 6 | Monitoring Processes | % of City staff reporting that the monitoring process among multiple departments saves City staff time | 85% | n/a | n/a | 79% | 73% |
| 7 | Monitoring Processes | % of City staff reporting that consistent standards and a shared monitoring process between City departments increases the City's ability to hold nonprofits accountable | 85% | n/a | n/a | 87% | 100% |
| 8 | Monitoring Processes | % of City staff reporting that the Non-profit Monitoring Program helps improve your Department's non-profit fiscal and compliance practices | 85% | n/a | n/a | 86% | 73% |
| 9 | Contractor Feedback | % of Contractors who report a clear understanding of the fiscal and compliance elements to be monitored in their contracts | 95% | 90% | 100% | 95% | 100% |
| 10 | Controller's Resources | % of City monitors who rate the training series as very helpful or somewhat helpful (of those who attended) | 95% | 91% | 100% | 89% | 100% |
| 11 | Controller's Resources | % of City contractors who rate the training series as very helpful or somewhat helpful (of those who attended) | 95% | n/a | 100% | 100% | 100% |
| 12 | Capacity Building | % reduction in findings for Nonprofits that received technical assistance in the previous fiscal year | 80% | 67% | 50% | 68% | 66% |

APPENDIX E: City Monitoring Staff and Contractor Survey Responses, FY15

1. City Monitoring Staff Survey Responses

The Controller's Office asked City monitors to respond to questions about the Citywide Nonprofit Monitoring and Capacity Building Program at the close of the FY15 monitoring cycle. Eleven monitors (33%) from seven of the nine departments responded.

City Monitors that responded to the survey generally believe the program is successful, as shown in the responses below. However, there is always room for improvement, and monitors offered the feedback that follows.



Monitors' Ideas for Improving the Program

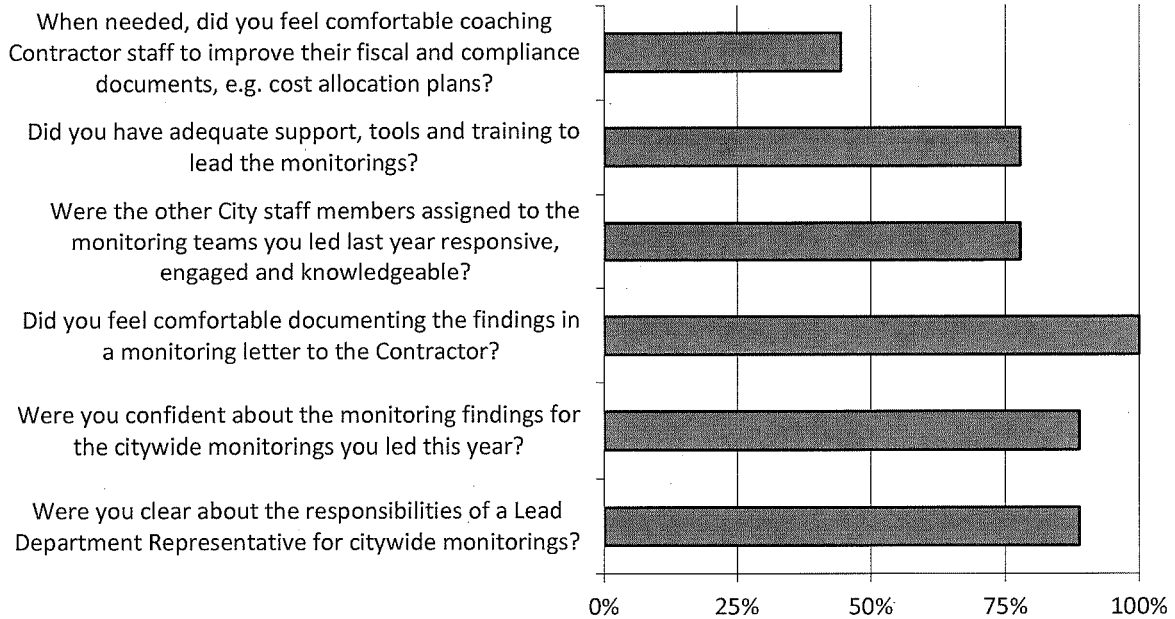
- Additional training for monitors, particularly in fiscal areas
- Automated processes for developing program documents¹
- Streamlining the Standard Monitoring Form
- Focus the monitoring on fiscal areas only and reduce the number of standards
- Incorporate more of the federal guidelines from the Office of Management and Budget into the monitoring form

Lead Monitors take on the bulk of the duties related to arranging a site visit or self-assessment. Leads responding to the survey indicated low levels of confidence in coaching contractors when they have findings, and would like more support and tools in these areas.

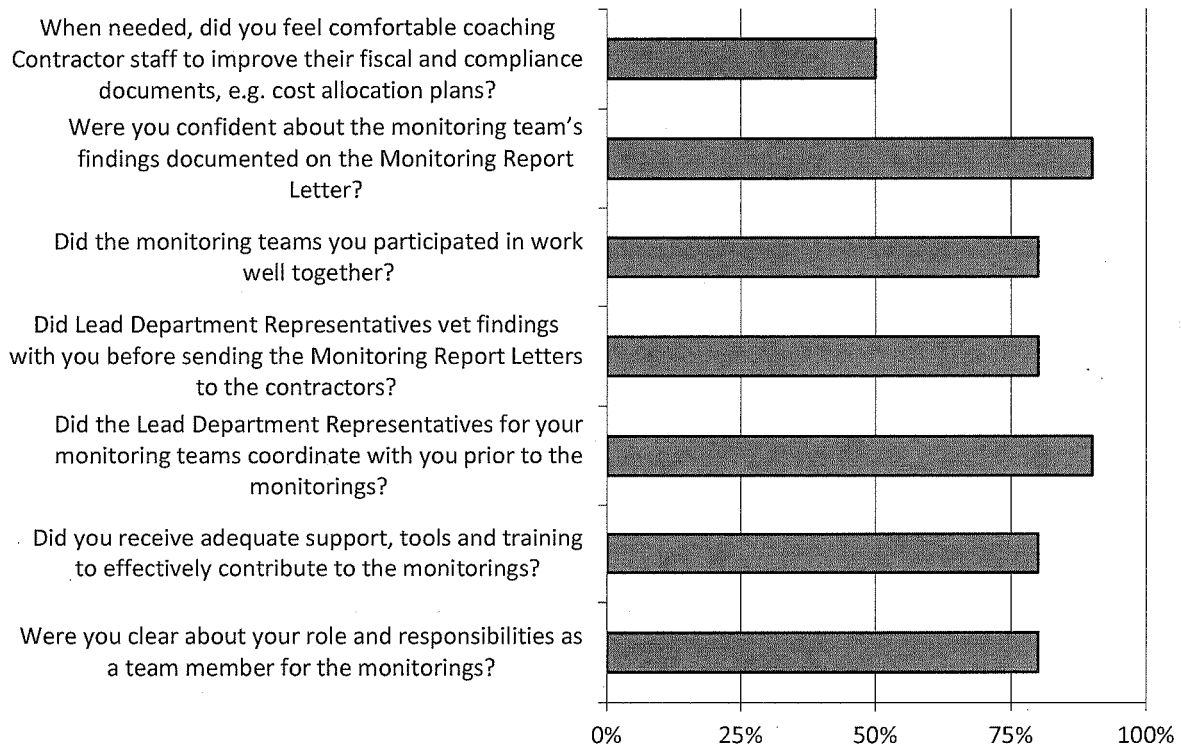
Monitoring Team Members also expressed low levels of confidence in their ability to coach contractors with findings, and while opinions about the program are generally positive, there remains room for improvement in several areas, including ensuring full participation by all team members in the monitoring process.

¹ The Controller's Office is in the process of developing an online workflow for monitors to use to develop monitoring reports and final status letters.

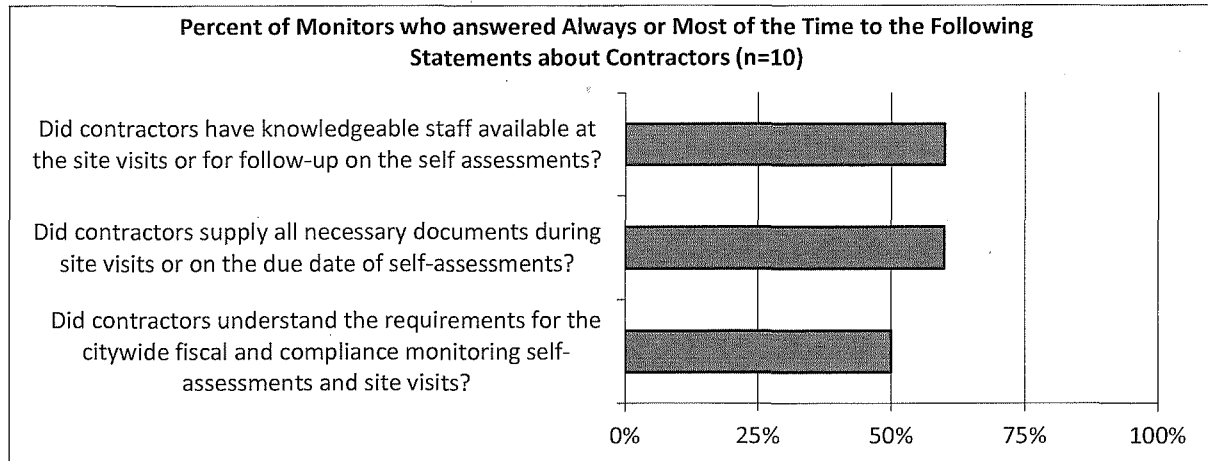
**Percent of Monitors who responded Always or Most of the Time to the Following
Statements about being a Lead Monitor (n=9)**



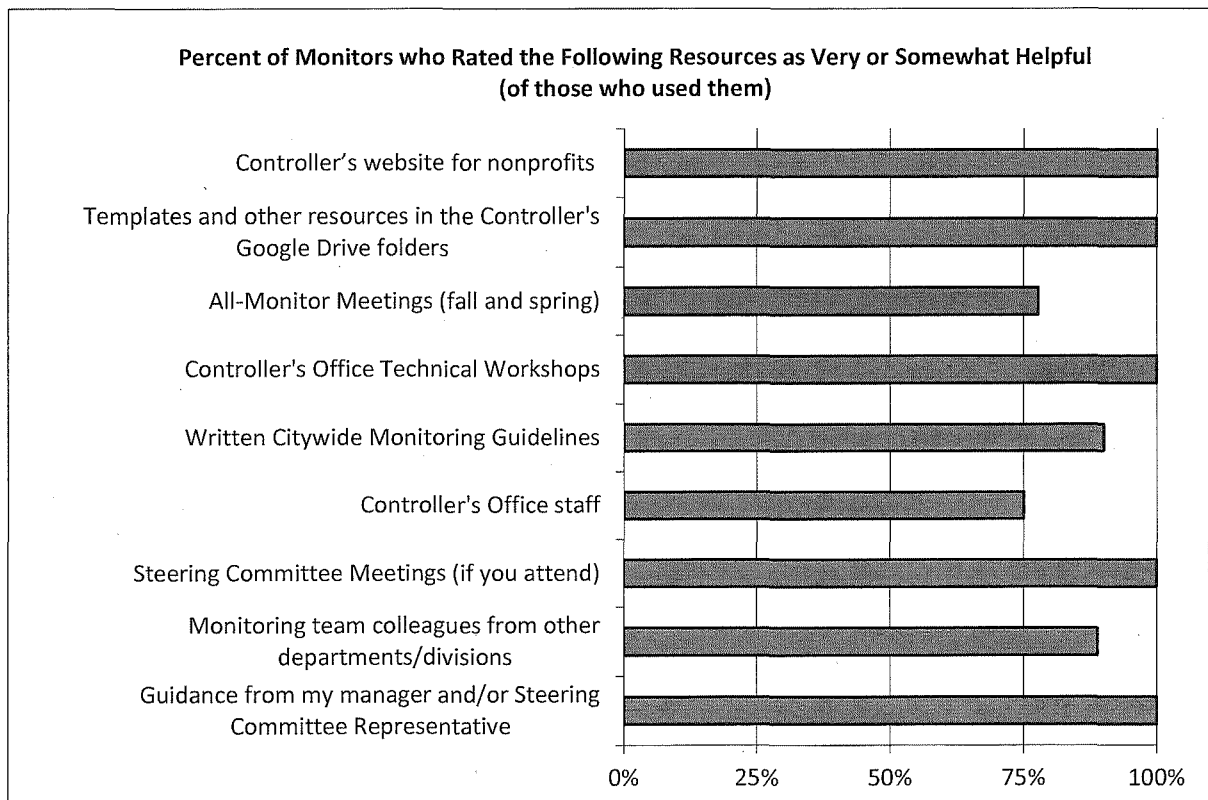
**Percent of Monitors who responded Always or Most of the Time to the Following
Statements about being a Team Member (n=10)**



Monitors provided feedback about their interactions with nonprofit contractors. Just half of the monitors who responded to the survey reported that contractors always or mostly understood the requirements of the program. This represents an opportunity for increased communication with nonprofit partners.



The program offers several types of resources to the monitors throughout the year, and the survey asked respondents to rate how helpful these resources proved. The Controller's Office staff and the newly instated "All Monitor Meetings" received mixed reviews for helpfulness, while respondents more clearly appreciated other tools, such as the Controller's Office website and training series for monitors.

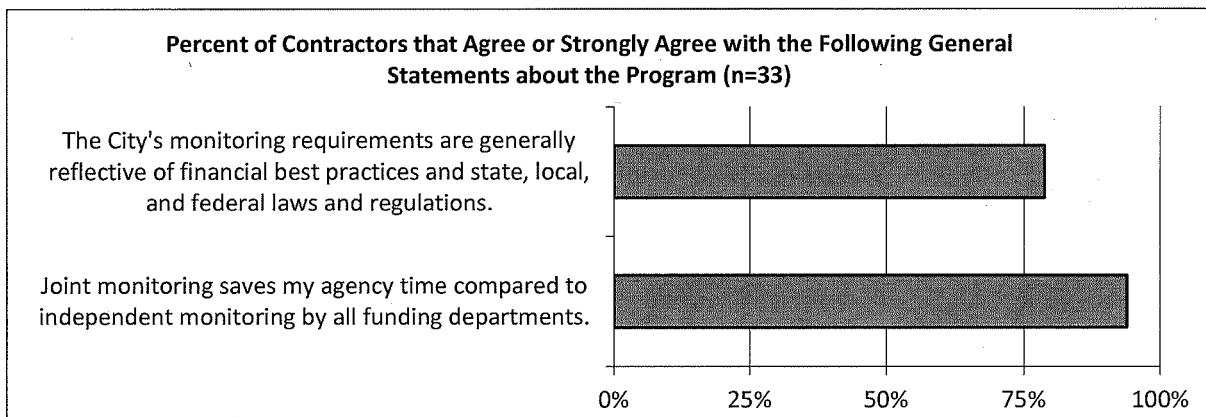


2. Contractor Survey Responses

Each year, the Controller's Office solicits feedback from contractors engaged in the Monitoring Program using an online survey. In FY15, 48 contractors responded, representing 38% of the year's pool. The majority of the respondents (65%) received a site visit, while the remainder received a self-assessment.

Respondents were monitored by a mix of lead departments, with the most common lead being DPH or DCYF. The Sheriff's Department was not the lead for any of the contractors responding, but may have been on the monitoring team for one or more of the respondents. Site visits generally required a half day of the contractors' time (67%), though nearly a quarter of visits (24%) required up to a full day.

Most respondents agree that joint monitoring saves time and that the standards are reflective of best practices. Comments shared by nonprofit respondents show a mix of approval for the process, as well as some areas of confusion or dissatisfaction, such as in understanding how to assess certain standards, particularly in a self-assessment.



Respondents offered both positive and critical feedback about the program, both of which can be used to support program improvements. We have summarized the comments related to site visits and self-assessments below.

Contractors' Feedback about Site Visits and Self-Assessments

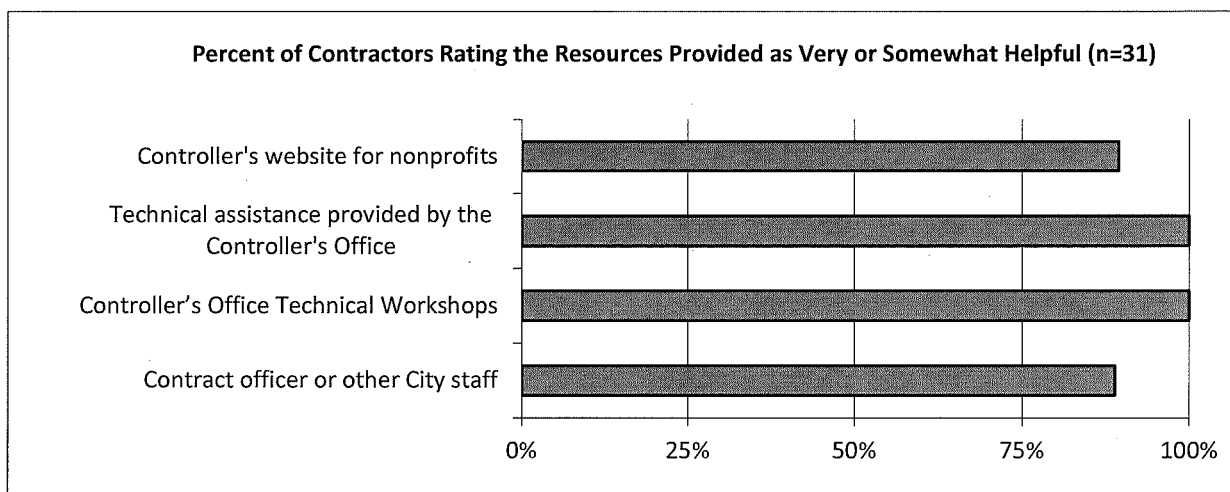
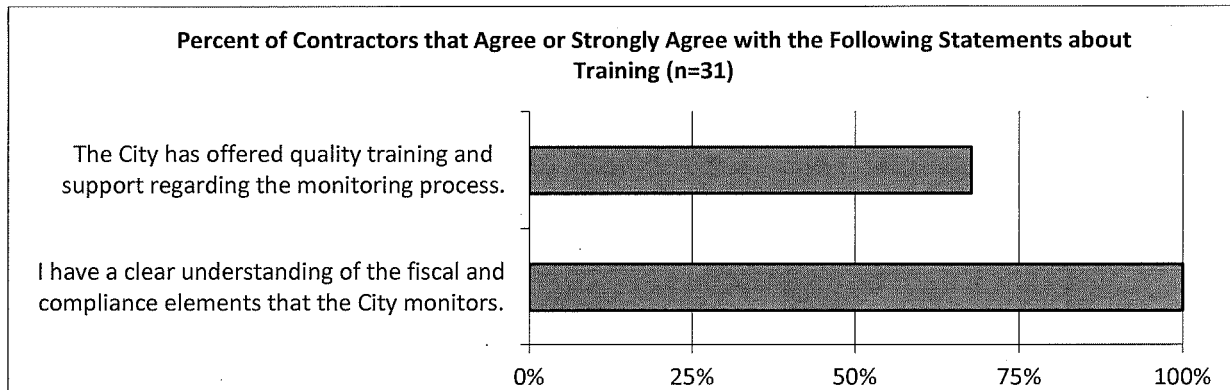
Several respondents indicated approval of the process as a way to meet the City staff and work with them more closely. One said, *"We appreciate the feeling of partnership with the city offices that fund our programs. We have always found them to be supportive, accessible, and sympathetic to our constraints."*

While some respondents stated that they received the technical assistance they requested, a couple of contractors noted a need for improvements in how monitors provide technical assistance related to meeting the standards. One said, *"Pretty haphazard; seemed more retaliatory than useful."*

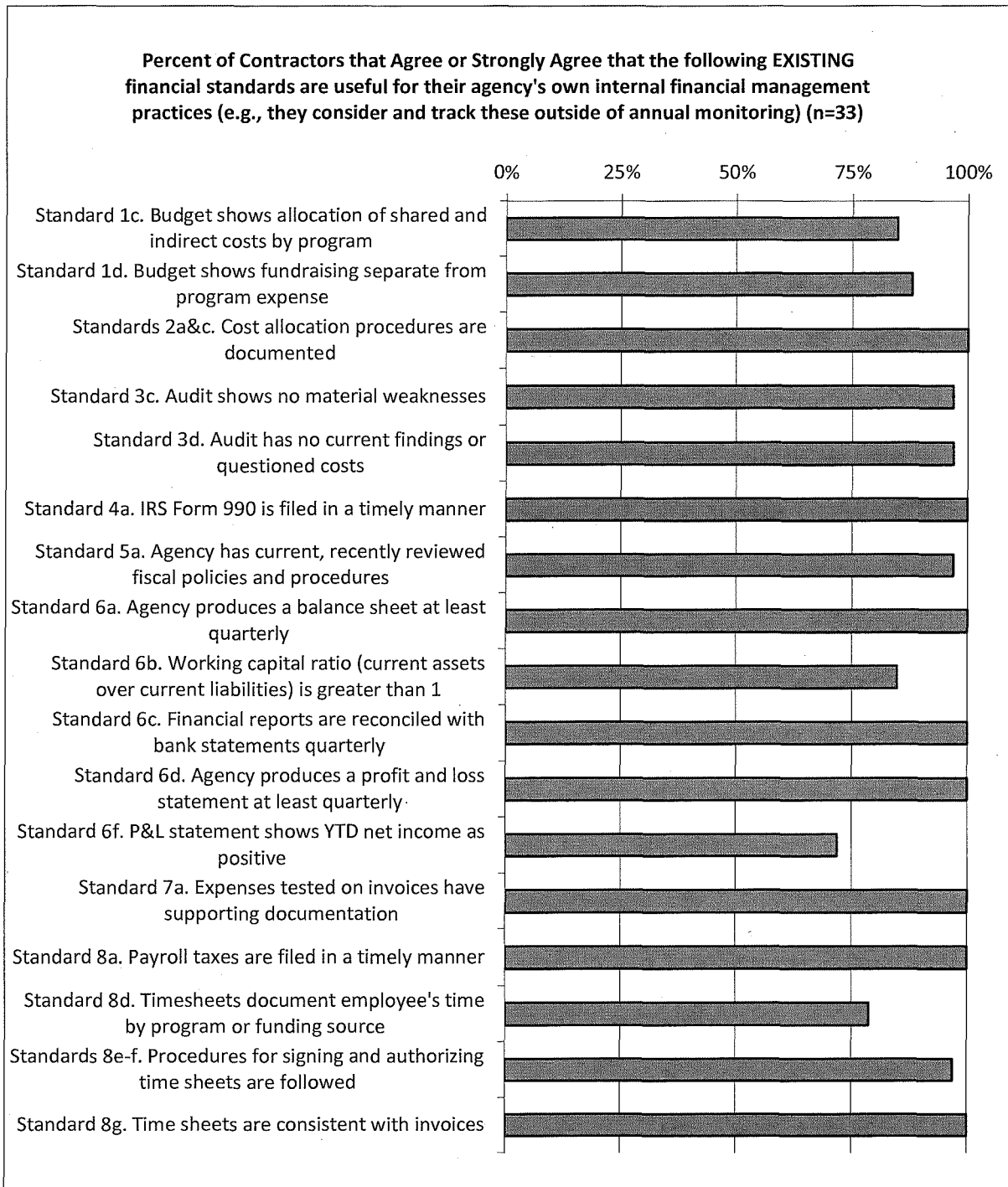
One contractor commented that the in-person meetings are helpful as they provide space to explain the numbers showing up in the financial documents. *"This conversation lends the texture to what is happening and evolving within the organization and thus deepens the partnership with the agency and its funders."* However, another respondent felt that too much weight was put on the numbers (e.g., the results of certain ratios derived from the audit) without having the opportunity to provide reasonable explanation. This could be a result of variance in how monitoring teams work with contractors or the monitoring team's level of understanding of the standards.

Some of the comments respondents provided indicate a need for further explanation about the monitoring process and the standards from the monitoring team. For example, there were statements about not knowing certain standards were going to be monitored, and questions about how the cash flow ratios are applied, and concerns about how having "minor" compliance findings might be perceived by the public.

Capacity building is a valuable element of the City's program, and contractors generally agree that the resources provided in relation to this program are useful.



New in FY15, the Controller's Office asked nonprofit contractors to provide feedback about the standards themselves via the year-end survey. The City will incorporate this feedback into its process of ensuring the standards are effective at assessing the fiscal health of a nonprofit contractor.

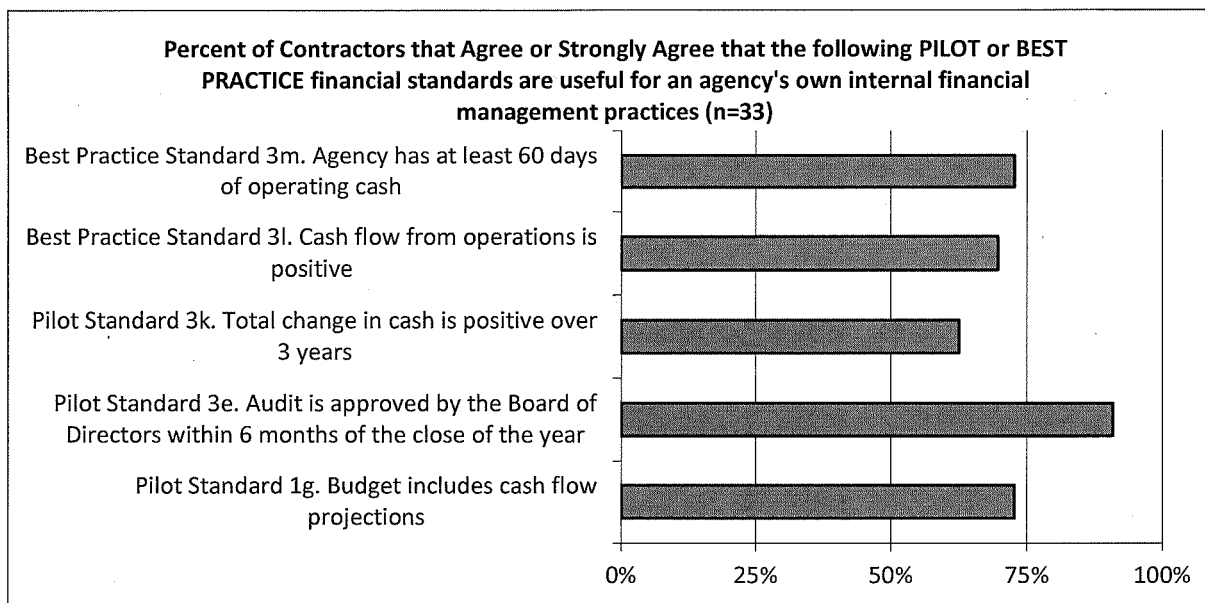


Several respondents commented about the burdensome nature of the standards related to timesheets. Standards require that timesheets be functional, allowing employees to document time spent on specific programs. Timesheets must be signed by both the employee and supervisor and changes must be initialed by both staff members as well. There are certain federal requirements related to how employees' time is allocated to program areas, and accommodating these requirements without undue burden remains an area of growth for the City.

One respondent stated: "Nonprofits financial activity can vary from year to year, it is important to look at several years of activity." This may be challenging given the annual nature of monitoring, but is important feedback that departments generally confirm.

In FY15, the City tested some new standards, labeling these either "pilot" or "best practice" standards. Respondents had more critiques of these new standards than the existing ones, and generally a lower opinion of their utility in assessing financial health.

As noted in the general feedback above, some of the comments seem to relate to a need to communicate the rationale of the standard and to the monitors' need to better understand reasonable explanations for variance. One contractor stated, "The contractor should have a chance to explain the situation. E.g., is spending money on expansion a bad thing? Are we responsible for the City's late payments?" The standards are not meant to penalize a contractor when a reasonable explanation has been provided, and the frustration conveyed in this comment and others like it speaks to the need for more training about the standards.



The Controller's Office requested contractors share their own preferred metrics or indicators for assessing the financial health of their organizations. Some of these exist on the current Standard Monitoring Form, while others are new.

Indicators Used by Nonprofits to Assess their Financial Health

- Current ratio (e.g., working capital) (referenced by 6 respondents)
- Quarterly financial statements (including comparison to prior year) (x5)
- Budget includes cash flow projection (x5)
- Cash on hand / positive cash flow (x4)
- Monthly reconciliation / budget to actual analysis (x4)
- Unrestricted net assets (x3)
- Level of surplus / financial reserve amount (x2)
- Timely documentation (x2)
- Strong internal controls (x2)
- Independent audit (x2)
- Board approves audit (x2)
- Impact Statement: how does agency perform in its service provision
- Days receivable
- Growth in funding over the years
- Cost allocation procedures being followed

The survey also asked respondents to share any governance indicators used internally to assess the strength of a nonprofit's board or leadership. The program included certain governance best practices in the Standard Monitoring Form two years ago, but there is room for improvement in how the City assesses this critical component of a nonprofit's financial health and sustainability.

Indicators Used by Nonprofits to Assess Strength of Governance

- Board participation in fundraising / annual giving (x9)
- Board meetings regularly achieve quorum / attendance (x8)
- Presence of committees / completion of work by committees (x4)
- Regular review of finances (x4)
- Board members understand program / review program / track program outcomes and metrics (x4)
- Independent CPA consultation / annual audit (x3)
- Responsiveness to agency request for guidance / oversight of Director (x3)
- Range of skills and contributions, e.g., legal or financial (x2)
- Mentoring or training of new Board members (x2)
- Board internal governance: bylaws, accountability, term limits (x2)
- Board satisfaction survey
- Quality of debate and decisions of the Board
- Board discusses new member recruitment regularly
- Regularity of Board meetings
- Internal control procedures

From: Reports, Controller (CON)
Sent: Thursday, September 03, 2015 12:18 PM
To: Calvillo, Angela (BOS); Gosiengfiao, Rachel (BOS); BOS-Supervisors; Kawa, Steve (MYR); Howard, Kate (MYR); Steeves, Asja (CON); Campbell, Severin (BUD); Newman, Debra (BUD); Rose, Harvey (BUD); SF Docs (LIB); CON-EVERYONE; Gascon, George (DAT); Garcia, Barbara (DPH); Nuru, Mohammed (DPW); Ginsburg, Phil (REC); Kelly, Naomi (ADM); Su, Maria (CHF); Rufo, Todd (ECN); Kelly, Jr, Harlan (PUC); Rhorer, Trent (HSA) (DSS); DeCaigny, Tom (ART); Wolf, Delene (RNT); Reiskin, Ed (MTA); Hui, Tom (DBI); John Martin (AIR); Mohammed Soriano Bilal; dianeg@bay100cpi.org; nfong@chinatowncdc.org; vpan@caasf.org; sheryl@momagic.org; dfong@fca-arch.com; chiulin@fca-arch.com; michelle@mackenziewarehouse.com; nandrews@liifund.org; joe@sanfrancisco.travel; mjmsf@earthlink.net; Lien@secteam.com; cathy@secteam.com; Marianne@secteam.com; Eugene.Yano@YanoCPA.com
Cc: Clendinen, Eugene (DAT); Wagner, Greg (DPH); Dawson, Julia (DPW); Petrucione, Katharine (REC); Bukowski, Kenneth (ADM); Chyi, Leo (CHF); Pascual, Merrick (ECN); Hom, Nancy (PUC); Simmons, Noelle (HSA) (DSS); Krell, Rebekah (ART); Collins, Robert (RNT); Bose, Sonali (MTA); Madison, Taras (DBI); Wallace Tang (AIR)
Subject: Issued: All Ten Selected Organizations Complied With City Law by Not Using City Funds for Political Activity

The City Services Auditor Division (CSA) of the Office of the Controller today issued its assessment of ten organizations' compliance with the San Francisco Administrative Code, Chapter 12G, which prohibits the use of city funds for political activity. The assessment found that none of the ten organizations assessed used funds they received under city grants, contracts, or loans in fiscal year 2013-14 for political activity. However, one organization did not comply with city guidelines for the allocation of indirect costs billed to the City but corrected its allocation method in June 2015.

To view the full report, please visit our website
at: <http://openbook.sfgov.org/webreports/details3.aspx?id=2198>

This is a send-only e-mail address.

For questions about the report, please contact Director of City Audits Tonia Lediju at tonia.lediju@sfgov.org or 415-554-5393 or the CSA Audits Unit at 415-554-7469.

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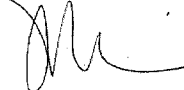
CITY AND COUNTY OF SAN FRANCISCO
OFFICE OF THE CONTROLLER

Ben Rosenfield
Controller

Todd Rydstrom
Deputy Controller

MEMORANDUM

TO: Mayor and Board of Supervisors

FROM: Tonia Lediju, Director of City Audits
City Services Auditor Division 

DATE: September 3, 2015

SUBJECT: All Ten Selected Organizations Complied With the San Francisco
Administrative Code, Chapter 12G, by Not Using City Funds for
Political Activity for Fiscal Year 2013-14

The Office of the Controller's (Controller) City Services Auditor Division (CSA) presents its assessment of ten organizations' compliance with Chapter 12G of the San Francisco Administrative Code, which prohibits the use of city funds for political activity. CSA engaged Sjoberg Evashenk Consulting, Inc., to conduct this assessment to meet the Administrative Code's requirement that the Controller annually review at least ten persons or entities that enter contract, grant, or loan agreements with the City and County of San Francisco (City) to ensure that the selected entities complied with the prohibition. The assessment found that none of the ten organizations assessed used city funds they received under city grants, contracts, or loans in fiscal year 2013-14 for political activity. However, one organization, Chinese for Affirmative Action (CAA), did not comply with city guidelines for the allocation of indirect costs. CAA concurs with the finding and states that it corrected the allocation methodology in June 2015.

CSA will follow up with CAA in next year's political activity assessment to ensure the organization used the correct allocation methodology to bill indirect costs to the City.

CSA appreciates the assistance and cooperation of city departments and city vendors during the assessment. For questions about the memorandum, please contact me at Tonia.Lediju@sfgov.org or 415-554-5393 or CSA at 415-554-7469.

Attachment

cc: Ben Rosenfield, Controller
Todd Rydstrom, Controller
Eugene Clendinen, Office of the District Attorney
Greg Wagner, Department of Public Health
Julia Dawson, Department of Public Works

Kate Howard, Office of the Mayor
Katherine Petrucione, Recreation and Park Department
Kenneth Bukowski, General Services Agency
Leo Chyi, Department of Children, Youth & Their Families
Merrick Pascual, Office of Economic and Workforce Development
Nancy Hom, Public Utilities Commission
Noelle Simmons, Human Services Agency
Rebekah Krell, Arts Commission
Robert Collins, Rent Board
Sonali Bose, Municipal Transportation Agency
Taras Madison, Department of Building Inspection
Wallace Tang, Airport Commission
Cathy Brady, Sjoberg Evashenk Consulting
Eugene Yano, Yano Accountancy

Budget Analyst
Citizens Audit Review Board
City Attorney
Civil Grand Jury
Public Library

MEMORANDUM

TO: Tonia Lediju, Director of City Audits
City Services Auditor Division

FROM: Catherine Brady, Director
Sjoberg Evashenk Consulting, Inc.

DATE: August 18, 2015

SUBJECT: All Ten Selected Organizations Complied With the San Francisco
Administrative Code, Chapter 12G, by Not Using City Funds for Political
Activity

EXECUTIVE SUMMARY

The City and County of San Francisco (City), Office of the Controller (Controller), City Services Auditor Division (CSA), engaged Sjoberg Evashenk Consulting (SEC) to assess the compliance of ten organizations, six nonprofit and four for-profit, with Chapter 12G of the San Francisco Administrative Code (Administrative Code), which prohibits the use of city funds for political activity. CSA engaged SEC to conduct this assessment to meet the Administrative Code's requirement that the Controller annually review at least ten persons or entities that enter contract, grant, or loan agreements with the City to ensure that the selected entities complied with the prohibition. The Administrative Code defines political activity as participating in, supporting, or attempting to influence a political campaign for any candidate or ballot measure. None of the ten organizations assessed used for political activity city funds they received under city grants, contracts, or loans in fiscal year 2013-14. However, one organization, Chinese for Affirmative Action, did not comply with city guidelines for the allocation of indirect costs. The organization concurs with the finding and states it corrected the allocation methodology in June 2015.

BACKGROUND, OBJECTIVES & METHODOLOGY

Background

To ensure compliance with the prohibition on the use of city funds for political activity, Chapter 12G of the Administrative Code requires the Controller to annually review at least ten persons or entities that enter contract, grant, or loan agreements with the City. San Francisco voters caused this prohibition to become city law when they passed Proposition Q in November 2002. The law defines political activity as participating in, supporting, or attempting to influence a

T H E E Q U A T I O N F O R E X C E L L E N C E

455 CAPITOL MALL, SUITE 700 · SACRAMENTO, CALIFORNIA 95814 · (916) 443-1300 · FAX (916) 443-1350 · WWW.SECTEAM.COM

political campaign for any candidate or ballot measure, and requires that all city contract, grant, and loan agreements disclose the prohibition.

The Controller's rules for implementing the Administrative Code's prohibition require the City to demand repayment of any city funds used for political purposes. Moreover, the rules specify penalties for recipients of city funds that use them for political purposes.

Objective

The assessment's primary purpose was to determine whether any of the ten selected organizations illegally expended city funds to participate in, support, or attempt to influence a political campaign for any candidate or ballot measure.

Methodology

Using the City's financial system records, SEC selected ten organizations from among those that received city funds under contracts, grants, or loan agreements during city fiscal year 2013-14 (July 1, 2013, through June 30, 2014). Exhibit 1 summarizes amounts the City paid to organizations under *all* contracts, grants, and loans. SEC also obtained data from the City's campaign finance database to identify those organizations who made contributions to political groups.

| EXHIBIT 1 City Contract, Grant, Loan, and Other Payments Fiscal Year 2013-14 | |
|--|------------------------|
| Payment Category | Total Payments |
| Contracts | \$1,552,961,998 |
| Grants | 312,408,647 |
| Loans | 65,695,823 |
| Other* | 111,766,547 |
| Total | \$2,042,833,015 |

Note: *In-kind payments including services such as equipment and building maintenance provided by departments.

Source: Auditor's analysis of data from City's accounting system.

SEC then matched the names and addresses of organizations receiving city funds and the names and addresses of organizations that made contributions to political groups to serve as the universe of organizations selected for this assessment. The selection was made to include various types of organizations and agreements, and considered other factors, such as the amount of political contribution made by the organizations—higher amounts increased the likelihood of selection—and whether the organization had been selected for a previous Proposition Q assessment—if it had, this reduced the likelihood of selection. Exhibit 2 lists the organizations SEC selected for the assessment.

EXHIBIT 2 **Ten Organizations Selected for Political Activity Assessment**
Fiscal Year 2013-14

| Organization | Type | Category | City Funding Received |
|--|------------|-------------------|-----------------------|
| African American Art & Culture Complex | Nonprofit | Grants | \$864,323 |
| Bayview Association for Youth | Nonprofit | Grants | 104,446 |
| Chinatown Community Development Center | Nonprofit | Contracts, Grants | 1,871,398 |
| Chinese for Affirmative Action | Nonprofit | Contracts, Grants | 1,079,852 |
| Collective Impact | Nonprofit | Contracts, Grants | 1,461,347 |
| Fong & Chan Architects | For-profit | Contracts | 3,506,598 |
| Low Income Investment Fund | Nonprofit | Grants | 1,549,414 |
| MacKenzie Warehouse | For-profit | Contracts, Others | 485,719 |
| San Francisco Travel Association | Nonprofit | Contracts | 920,845 |
| Transaction Alternatives | For-profit | Contracts | 9,916 |
| Total: | | | \$11,853,858 |

Source: Auditor's analysis of data from City's accounting system.

As part of the assessment, we verified that the selected organizations' agreements with the City included prohibitions on using city funds for political activity. We reviewed invoices submitted by the organizations, inspected tax returns, financial statements and accounting records, and verified certain payments the City made to each organization during fiscal year 2013-14.

We inquired of the organizations' officers whether they had spent city or other funds for purposes related to political activity. We also obtained written management representation from each organization certifying that no city funds were used for political activity.

Generally accepted government auditing standards do not cover the conduct of nonaudit services, which are defined as professional services other than audits or attestation engagements. Therefore, SEC is not responsible for the substantive outcomes of the work performed during this assessment. Rather, management of the city departments that engaged the assessed organizations is responsible to be in a position, in fact and appearance, to make an informed judgment on the results of the nonaudit service.

RESULTS

All ten organizations assessed complied with the prohibition on using for political activity city funds received under grants, contracts, and loans from or with city departments. The organizations did not use city funds to participate in, support, or attempt to influence a political campaign for any candidate or ballot measure during fiscal year 2013-14. However, one organization, Chinese for Affirmative Action (CAA), did not comply with the City's *"Cost Allocation Guidelines for Nonprofits Doing Business with the City."* Specifically, CAA allocated indirect costs that benefited CAA's political activities to the City's final cost objectives instead of allocating them to a final political activity cost objective. Because CAA's indirect cost rates, after the correction of the error were significantly higher than the maximum indirect cost rates allowable under CAA's contracts with the City, the City did not pay (and CAA did not use) any city funds for political activities during fiscal year 2013-14.

CAA concurs that it used the incorrect cost allocation methodology and has indicated that it corrected the allocation in June 2015. CAA's improper cost allocation methodology was used in past billings to the City, which could have resulted in using city funds for political activities in prior fiscal years. However, CAA stated that it has reviewed its cost allocation for fiscal years 2011-12 and 2012-13 as well as activity from July 1, 2014, through May 31, 2015, and determined that no political activity costs were billed to or collected from the City. CAA also stated that it has changed its cost allocation practice to be in compliance with city guidance.

Recommendation:

The City Services Auditor should review CAA's indirect cost rate in the fiscal year 2014-15 Political Activity Assessment to ensure that CAA properly calculated the indirect rate allocation methodology billed to the City.

ATTACHMENT A: CITY SERVICES AUDITOR DIVISION RESPONSE



CITY AND COUNTY OF SAN FRANCISCO
OFFICE OF THE CONTROLLER

Ben Rosenfield
Controller

Todd Rydstrom
Deputy Controller

August 17, 2015

Ben Rosenfield
Controller
Office of the Controller
City Hall, Room 316
San Francisco CA 94102-4694

Re: *Response to Chapter 12G, Fiscal Year 2013-14 Political Activity Assessment*

Dear Mr. Rosenfield,

I am pleased to find that the Fiscal Year 2013-14 Political Activity Assessment found that none of the ten organizations assessed used city funds they received under city grants, contracts, or loans for political activity. The City Services Auditor Division (CSA) agrees with the report prepared by Sjoberg Evashenk Consulting and concurs with the recommendation made by Sjoberg Evashenk Consulting to review Chinese for Affirmative Action's (CAA) indirect cost rate in the fiscal year 2014-15 Political Activity Assessment to ensure that CAA properly calculated the indirect rate allocation methodology billed to the City. CSA will review Chinese for Affirmative Action's indirect cost allocation methodology as part of next year's assessment.

If I can be of assistance, please do not hesitate to contact me at Tonia.Lediju@sfgov.org or 415-554-5393.

Respectfully,

Tonia Lediju
Director of City Audits

ATTACHMENT B: CONTRACTOR RESPONSE



June 18, 2015

Tonia Ledjir
Director of City Audits
Office of the Controller
City Services Auditor Division
City and County of San Francisco
1 Dr. Carlton B. Goodlett Place, Room 477
San Francisco, CA 94102

Dear Ms. Ledjir:

This letter is in response to the Sjoberg Evashenk Consulting audit of Chinese for Affirmative Action (CAA) to determine whether any City funds were used for political activities during the year 7/1/2013 to 6/30/2014.

We concur with the summary that CAA did not use any City funds on political activities during the year 7/1/2013 to 6/30/2014. We also concur with the finding that for one program CAA was not in compliance with cost allocation guidelines, and that this program was not allocated indirect costs because those costs were based on amounts recoverable rather than benefit. However, as the audit noted, CAA did not bill or collect any amounts for political activity-related indirect costs, and as a result no funds were improperly allocated to City contracts.

We have reviewed our cost allocation for YTD 7/1/2014 to 5/31/2015, and the years 7/1/2011 to 6/30/2012 and 7/1/2012 to 6/30/2013. We have determined that no political activity costs including allocated indirect costs were billed to or collected from the City. We have also changed our cost allocation practice to be in compliance with City guidelines.

We are providing our auditors with a copy of the Sjoberg Evashenk Consulting audit and this response letter, and will work with them to modify financial statements as necessary.

I am happy to answer any additional questions.

Sincerely,

John Fong
Associate Director

1100 Sutter Street, 17th Floor, San Francisco, California 94109
(415) 374-6750 fax (415) 397-6750 • www.caa.org



OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION

1725 23rd Street, Suite 100
 SACRAMENTO, CA 95816
 (916) 445-7000 Fax: (916) 445-7053
 calshpo@parks.ca.gov

BOARD OF SUPERVISORS
 SAN FRANCISCO

2015 AUG 31 PM 2:51

B

August 27, 2015

San Francisco County Board of Supervisors
 1 Dr. Carlton B. Goodlett P. #244
 San Francisco, California 94102

**RE: National Register of Historic Places Nomination for
 San Francisco Art Institute**

Dear Board of Supervisors:

Pursuant to Federal Regulations 36 CFR Part 60.6(c) I am notifying you that the State Historical Resources Commission (SHRC) at its next meeting intends to consider and take action on the nomination of the above-named property to the National Register of Historic Places (National Register). Details on that meeting are on the enclosed notice. The National Register is the federal government's official list of historic buildings and other cultural resources worthy of preservation. Listing in the National Register provides recognition and assists in preserving California's cultural heritage. If the item is removed from the scheduled agenda, you will be notified by mail.

Local government comments regarding the National Register eligibility of this property are welcomed. Letters should be sent to California State Parks, Attn: Office of Historic Preservation, Julianne Polanco, State Historic Preservation Officer, 1725 23rd Street, Suite 100, Sacramento, California 95816. So that the SHRC will have adequate time to consider them, it is requested, but not required, that written comments be received by the Office of Historic Preservation fifteen (15) days before the SHRC meeting. Interested parties are encouraged to attend the SHRC meeting and present oral testimony.

As of January 1, 1993, all National Register properties are automatically included in the California Register of Historical Resources (California Register) and afforded consideration in accordance with state and local environmental review procedures.

The federal requirements covering the National Register program are to be found in the National Preservation Act of 1966, as amended, and in Federal Regulations 36 CFR Part 60. State law regarding the California Register is in the Public Resources Code, Section 5024. Should you have questions regarding this nomination, or would like a copy of the nomination, please contact the Registration Unit at (916) 445-7004.

Sincerely,

Julianne Polanco
 State Historic Preservation Officer

Enclosures: Meeting Notice

NR_Local Gov County Notice_Final

3

**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**



1725 23rd Street, Suite 100
SACRAMENTO, CA 95816
(916) 445-7000 Fax: (916) 445-7053
calshpo@parks.ca.gov
www.ohp.parks.ca.gov

MEETING NOTICE

FOR: State Historical Resources Commission Quarterly Meeting

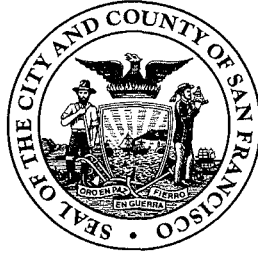
DATE: Friday, October 30, 2015

TIME: 9:00 A.M.

PLACE: Historic City Hall
Historic Hearing Room
915 I Street, 2nd Floor
Sacramento, California 95814

This room is accessible to people with disabilities. Questions regarding the meeting should be directed to the Registration Unit (916) 445-7008.

BOARD of SUPERVISORS



City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco 94102-4689
Tel. No. 554-5184
Fax No. 554-5163
TDD/TTY No. 544-5227

MEMORANDUM

Date: September 1, 2015
To: Honorable Members, Board of Supervisors
From: Angela Calvillo, Clerk of the Board
Subject: Form 700

This is to inform you that the following individual has submitted a Form 700 Statement:

Smooke, Joseph William – Legislative Aide – Leaving Office

BOARD of SUPERVISORS



City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco 94102-4689
Tel. No. 554-5184
Fax No. 554-5163
TDD/TTY No. 544-5227

MEMORANDUM

Date: September 4, 2015
To: Honorable Members, Board of Supervisors
From: Angela Calvillo, Clerk of the Board
Subject: Form 700

This is to inform you that the following individual has submitted a Form 700 Statement:

Chung Hagen, Sheila – Legislative Aide – Assuming Office

Opague

NOTICE OF TENTATIVE APPROVAL OF APPLICATION FOR A PERSONAL WIRELESS SERVICE FACILITY SITE PERMIT



Date: 8/26/15

Application No.: 15WR-0230

Applicant Name: Verizon Wireless

Location: 250 HOWARD ST

Edwin M. Lee
Mayor

Mohammed Nuru
Director

Jerry Sanguinetti
Manager

Street Use and Mapping
1155 Market St., 3rd floor
San Francisco, CA 94103
tel 415-554-5810

sfpublicworks.org
facebook.com/sfpublicworks
twitter.com/sfpublicworks

Public Works has tentatively approved the Application by Verizon Wireless for a Personal Wireless Service Facility Site Permit in the vicinity of 250 HOWARD ST. If approved, the Applicant may install a Personal Wireless Service Facility at this location. A photo-simulation of the proposed Personal Wireless Service Facility is attached hereto.

Pursuant to San Francisco Public Works Code § 1513, you have **20 calendar days** from the later of the date of this letter or the postmark to file a protest of the Application to Public Works. Your protest will be rejected if it is not filed on time.

Your protest may include a claim that the Planning Department should impose as a condition on the issuance of the permit that the proposed Personal Wireless Service Facility not obstruct the view from or light into any adjacent residential windows. (See Public Works Code § 1509(b)(2).) If your protest contains such a claim, please include with your protest photographs depicting the potential obstruction of the view or light from your windows so that the Planning Department can evaluate this aspect of your protest.

Approval of the proposed Personal Wireless Services Facility has been recommended by:

- ☒ Department of Public Works/ Bureau Street Use & Mapping
- ☒ San Francisco Department of Health
- ☒ Planning Department

RECEIVED
BOARD OF SUPERVISORS
SAN FRANCISCO
2015 SEP -2 PM 3:01

The tentative approval includes the following condition(s):

DPW Conditions:

1. This recommendation based on no variation from the depicted drawings and/or photo simulation; if a variation is different a re-submittal is required. Should the installation vary from said conditions, it should be resubmitted to Department(s) for further review and comment
2. New Poles: no new poles shall be erected or placed in underground districts.
3. Down Guys: Follow all excavation codes to obtain the necessary permits for placement of down guys. Down guy shall avoid crossing conflicting areas but not limited to driveways, curb ramps.
4. Comply with ADA code requirements for Federal, State, local laws. Make sure path of minimum required clear width for accessible path of travel is four feet.
5. At the conclusion of the work, provide a set of as built photos of the installation to the Bureau Street Use & Mapping Permit Office.
6. Maintain a valid certification of insurance annually and forward a copy to the Bureau Street Use & Mapping Permit Office.

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Department of Public Health Conditions:

1. Ensure that there are no publicly occupied areas within six and one half (6.5) feet of the antenna.
2. Ensure that any equipment associated with the pole installation of this antenna does not produce a noise in excess of 45 dBA as measured at three (3) feet from the nearest residential building façade..
3. Once the antenna is installed, ExteNet must take RF power density measurements with the antenna operating at full power to verify the level reported in the Hammett and Edison report and to ensure that the FCC public exposure level is not exceeded in any publicly accessible area. This measurement must be taken again at the time of the permit renewal.
4. Applicant should be aware that the general public may have concerns about the antenna and potential RF source near their dwellings. Applicant should have in place a mechanism for taking RF power density levels in nearby dwellings when requested by the members of the general public.
5. In accordance with the San Francisco Public Works Code, Art. 25, Sec. 1527 (a)(2)(C) Applicant is responsible for paying a fee of \$181.00 to the San Francisco Department of Public Health for this review.

Planning Department Conditions:

1. Plant and maintain an appropriate street tree.
2. No exposed meter, meter pan or meter pedestal may be used.
3. Antenna, and all equipment (external conduit, radio relay units, blinders used to shroud bracket bolts [if utilized], and mounting mechanisms); except signage if used for screening, shall all be painted to match the pole and repainted (maintain North Beach Italian flag tri-color, if present) as needed.
4. Cabling below radio relay units shall enter the pole with no more than a five-inch gap between bottom of each radio relay unit and the bottom of the corresponding entry hole on the pole. Conduit connection at pole entry points shall utilize the smallest fitting sizes available. Sealing compounds, if utilized, shall be tidy without excess bubbling and painted to match pole.
5. Remove raised equipment signage (including filling in manufacturer logo indentations on radio relay units/cabinets) and equipment decals that may be visible from sidewalk and dwellings, unless required by government regulation.
6. Utilize smallest RF warning signage allowed (4 x 6 inches); and place the warning sticker facing out toward street, at a location as close to antenna as is feasible. Sticker shall face away from street, when not facing a nearby window within 15 feet. Background color of sticker shall match the pole-mounting surface; and logo and text shall be white.
7. Stack equipment enclosures (not including antenna) as close as allowed by applicable regulation and manufacturer equipment standards.
8. Seams and bolts/screws at antenna and shroud assembly area shall be fabricated and installed in a manner so as to reduce their visibility (e.g. flush mounting screws) from sidewalk level.
9. Not utilize any visible flashing indicator lights or similar.
10. New below ground enclosure excavations (vault), if utilized, shall not damage or remove granite curbs. No significant gaps shall be created between vault enclosure lid and primary sidewalk material due to installation. Any other existing historic architectural elements within the public right-of-way shall be retained and protected during installation. No carrier logo or carrier name may be placed on the vault lid.
11. Non-essential radio relay unit elements (handle and legs) shall be removed.
12. The installer shall arrange to have Planning Department staff review the initial installation, in order to ensure compliance with the aforementioned conditions (notwithstanding inspections by pole owner and Department of Public Works).

The Applicant does not know at this time whether it will file an Application for a permit to modify the proposed Personal Wireless Service Facility at any time during the term of the Personal Wireless Service Facility Site Permit.

Any protest must be based on one or more of the following grounds:

1. The Department of Public Health incorrectly determined that the Application complies with the Public Health Compliance Standard (see Public Works Code § 1507).
2. The Planning Department incorrectly determined that the Application meets the applicable Compatibility Standard (see Public Works Code § 1509).
3. The Application does not comply with any other requirement for obtaining a Personal Wireless Service Facility Site Permit.
4. The Applicant intends to modify the Personal Wireless Service Facility after the permit is issued in a manner that would not comply with the applicable Compatibility Standard.

For frequently asked questions, please visit www.sf-planning.org/wireless.

To obtain additional information concerning the Application, you may contact any of the following (email preferred):

Applicant

Kevin Bowyer
408-219-5442
kbowyer@modus-corp.com

Public Works

Amanda Higgins
(415) 554-5343

To submit comments, support, or protest, please visit the Public Works website at the following address: bsm.sfdpw.org and click "Comment on Permit" and enter "15WR-0230"

Alternatively, you can send written comments to:

San Francisco Public Works
Bureau of Street-use and Mapping
1155 Market Street, 3rd Floor
San Francisco, CA 94103
Attention: Amanda Higgins

In order to receive correspondence from Public Works, the Applicant, and other interested parties, please include with your protest all of the following information: Street address, daytime telephone number, and electronic mail address [if available].

Amanda Higgins

Public Works Wireless Program



PRECISION DESIGN
&
Drafting, Inc.
Phone: (530) 823-6546
11768 Atwood Rd, Suite 20 Auburn, CA 95603

PROJECT: SC10

PROJECT ADDRESS: ACROSS FROM 250 HOWARD STREET
SAN FRANCISCO, CA 94105

PHOTO SIMULATION VIEW: LOOKING WEST FROM MAIN STREET

PREPARED ON 5-27-15

Opague

NOTICE OF TENTATIVE APPROVAL OF APPLICATION FOR A PERSONAL WIRELESS SERVICE FACILITY SITE PERMIT



Date: 8/26/15

Application No.: 15WR-0306
Applicant Name: Verizon Wireless
Location: 101 04TH ST

Public Works has tentatively approved the Application by Verizon Wireless for a Personal Wireless Service Facility Site Permit in the vicinity of 101 04TH ST. If approved, the Applicant may install a Personal Wireless Service Facility at this location. A photo-simulation of the proposed Personal Wireless Service Facility is attached hereto.

Pursuant to San Francisco Public Works Code § 1513, you have **20 calendar days** from the later of the date of this letter or the postmark to file a protest of the Application to Public Works. Your protest will be rejected if it is not filed on time.

Your protest may include a claim that the Planning Department should impose as a condition on the issuance of the permit that the proposed Personal Wireless Service Facility not obstruct the view from or light into any adjacent residential windows. (See Public Works Code § 1509(b)(2).) If your protest contains such a claim, please include with your protest photographs depicting the potential obstruction of the view or light from your windows so that the Planning Department can evaluate this aspect of your protest.

Approval of the proposed Personal Wireless Services Facility has been recommended by:

- ☒ Department of Public Works/ Bureau Street Use & Mapping
- ☒ San Francisco Department of Health
- ☒ Planning Department

The tentative approval includes the following condition(s):

DPW Conditions:

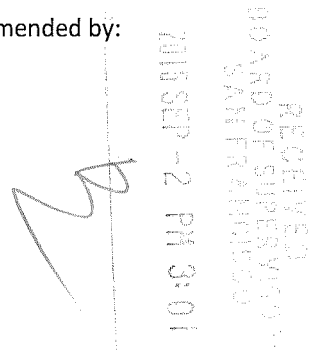
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2. New Poles: no new poles shall be erected or placed in underground districts.
3. Down Guys: Follow all excavation codes to obtain the necessary permits for placement of down guys. Down guy shall avoid crossing conflicting areas but not limited to driveways, curb ramps.
4. Comply with ADA code requirements for Federal, State, local laws. Make sure path of minimum required clear width for accessible path of travel is four feet.
5. At the conclusion of the work, provide a set of as built photos of the installation to the Bureau Street Use & Mapping Permit Office.
6. Maintain a valid certification of insurance annually and forward a copy to the Bureau Street Use & Mapping Permit Office.

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Department of Public Health Conditions:

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2. Ensure that any equipment associated with the pole installation of this antenna does not produce a noise in excess of 45 dBA as measured at three (3) feet from the nearest residential building façade..
3. Once the antenna is installed, ExteNet must take RF power density measurements with the antenna operating at full power to verify the level reported in the Hammett and Edison report and to ensure that the FCC public exposure level is not exceeded in any publicly accessible area. This measurement must be taken again at the time of the permit renewal.
4. Applicant should be aware that the general public may have concerns about the antenna and potential RF source near their dwellings. Applicant should have in place a mechanism for taking RF power density levels in nearby dwellings when requested by the members of the general public.
5. In accordance with the San Francisco Public Works Code, Art. 25, Sec. 1527 (a)(2)(C) Applicant is responsible for paying a fee of \$181.00 to the San Francisco Department of Public Health for this review.

Planning Department Conditions:

1. Plant and maintain an appropriate street tree.
2. No exposed meter, meter pan or meter pedestal may be used.
3. Antenna, and all equipment (external conduit, radio relay units, blinders used to shroud bracket bolts [if utilized], and mounting mechanisms); except signage if used for screening, shall all be painted to match the pole and repainted (maintain North Beach Italian flag tri-color, if present) as needed.
4. Cabling below radio relay units shall enter the pole with no more than a five-inch gap between bottom of each radio relay unit and the bottom of the corresponding entry hole on the pole. Conduit connection at pole entry points shall utilize the smallest fitting sizes available. Sealing compounds, if utilized, shall be tidy without excess bubbling and painted to match pole.
5. Remove raised equipment signage (including filling in manufacturer logo indentations on radio relay units/cabinets) and equipment decals that may be visible from sidewalk and dwellings, unless required by government regulation.
6. Utilize smallest RF warning signage allowed (4 x 6 inches); and place the warning sticker facing out toward street, at a location as close to antenna as is feasible. Sticker shall face away from street, when not facing a nearby window within 15 feet. Background color of sticker shall match the pole-mounting surface; and logo and text shall be white.
7. Stack equipment enclosures (not including antenna) as close as allowed by applicable regulation and manufacturer equipment standards.
8. Seams and bolts/screws at antenna and shroud assembly area shall be fabricated and installed in a manner so as to reduce their visibility (e.g. flush mounting screws) from sidewalk level.
9. Not utilize any visible flashing indicator lights or similar.
10. New below ground enclosure excavations (vault), if utilized, shall not damage or remove granite curbs. No significant gaps shall be created between vault enclosure lid and primary sidewalk material due to installation. Any other existing historic architectural elements within the public right-of-way shall be retained and protected during installation. No carrier logo or carrier name may be placed on the vault lid.
11. Non-essential radio relay unit elements (handle and legs) shall be removed.
12. The installer shall arrange to have Planning Department staff review the initial installation, in order to ensure compliance with the aforementioned conditions (notwithstanding inspections by pole owner and Department of Public Works).

The Applicant does not know at this time whether it will file an Application for a permit to modify the proposed Personal Wireless Service Facility at any time during the term of the Personal Wireless Service Facility Site Permit.

Any protest must be based on one or more of the following grounds:

1. The Department of Public Health incorrectly determined that the Application complies with the Public Health Compliance Standard (see Public Works Code § 1507).
2. The Planning Department incorrectly determined that the Application meets the applicable Compatibility Standard (see Public Works Code § 1509).
3. The Application does not comply with any other requirement for obtaining a Personal Wireless Service Facility Site Permit.
4. The Applicant intends to modify the Personal Wireless Service Facility after the permit is issued in a manner that would not comply with the applicable Compatibility Standard.

For frequently asked questions, please visit www.sf-planning.org/wireless.

To obtain additional information concerning the Application, you may contact any of the following (email preferred):

Applicant

Kevin Bowyer
408-219-5442
kbowyer@modus-corp.com

Public Works

Amanda Higgins
(415) 554-5343

To submit comments, support, or protest, please visit the Public Works website at the following address: bsm.sfdpw.org and click "Comment on Permit" and enter "15WR-0306"

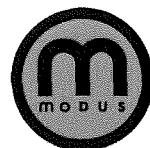
Alternatively, you can send written comments to:

San Francisco Public Works
Bureau of Street-use and Mapping
1155 Market Street, 3rd Floor
San Francisco, CA 94103
Attention: Amanda Higgins

In order to receive correspondence from Public Works, the Applicant, and other interested parties, please include with your protest all of the following information: Street address, daytime telephone number, and electronic mail address [if available].

Amanda Higgins

Public Works Wireless Program



PRECISION DESIGN
&
Draftings INC.

Phone: (530) 823-6546
11768 Atwood Rd, Suite 20 Auburn, CA 95603

PROJECT: SC90

PROJECT ADDRESS: 101 4TH STREET, SAN FRANCISCO, CA 94103

PHOTO SIMULATION VIEW: LOOKING NORTHWEST FROM 4TH STREET

PREPARED ON 4-8-15

Cpages

NOTICE OF TENTATIVE APPROVAL OF APPLICATION FOR A PERSONAL WIRELESS SERVICE FACILITY SITE PERMIT



Date: 8/26/15

Application No.: 15WR-0236
Applicant Name: Verizon Wireless
Location: 201 MISSION ST

Public Works has tentatively approved the Application by Verizon Wireless for a Personal Wireless Service Facility Site Permit in the vicinity of 201 MISSION ST. If approved, the Applicant may install a Personal Wireless Service Facility at this location. A photo-simulation of the proposed Personal Wireless Service Facility is attached hereto.

Pursuant to San Francisco Public Works Code § 1513, you have **20 calendar days** from the later of the date of this letter or the postmark to file a protest of the Application to Public Works. Your protest will be rejected if it is not filed on time.

Your protest may include a claim that the Planning Department should impose as a condition on the issuance of the permit that the proposed Personal Wireless Service Facility not obstruct the view from or light into any adjacent residential windows. (See Public Works Code § 1509(b)(2).) If your protest contains such a claim, please include with your protest photographs depicting the potential obstruction of the view or light from your windows so that the Planning Department can evaluate this aspect of your protest.

Approval of the proposed Personal Wireless Services Facility has been recommended by:

- ☒ Department of Public Works/ Bureau Street Use & Mapping
- ☒ San Francisco Department of Health
- ☒ Planning Department

The tentative approval includes the following condition(s):

DPW Conditions:

1. This recommendation based on no variation from the depicted drawings and/or photo simulation; if a variation is different a re-submittal is required. Should the installation vary from said conditions, it should be resubmitted to Department(s) for further review and comment
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Amanda Higgins
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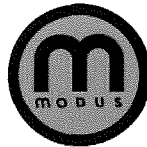
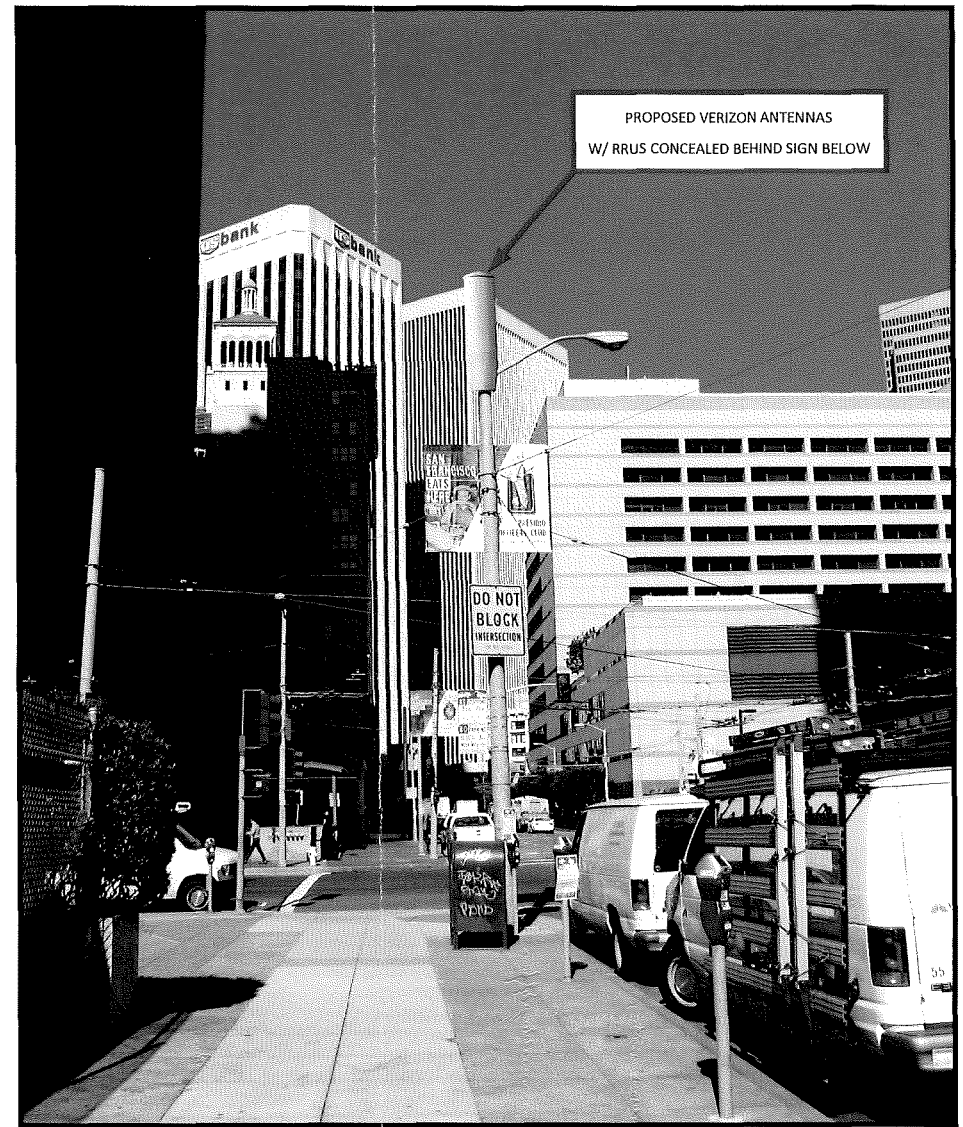
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Attention: Amanda Higgins

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Amanda Higgins

Public Works Wireless Program



PRECISION DESIGN
&
Drafting, Inc.
Phone: (530) 823-6546
11768 Atwood Rd, Suite 20 Auburn, CA 95603

PROJECT: SC20

PROJECT ADDRESS: 201 MISSION STREET, SAN FRANCISCO, CA 94105

PHOTO SIMULATION VIEW: LOOKING NORTHWEST FROM MISSION STREET

PREPARED ON 4-8-15



United States Department of the Interior

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

IN REPLY REFER TO
D18 (GOGA-PLAN)

AUG 11 2015

Dear Friend of Golden Gate National Recreation Area and Muir Woods National Monument:

We are pleased to present this Summary Edition of the final General Management Plan for Golden Gate National Recreation Area and Muir Woods National Monument. This is an abridged version of the two-volume *Golden Gate National Recreation Area and Muir Woods National Monument General Management Plan/Environmental Impact Statement (FGMP/EIS)*. It is intended to provide background to the plan and a complete description of the National Park Service's selected alternative for future management of the park without reading the full plan.

Digital versions of this Summary Edition, the FGMP/EIS, and the Record of Decision are available online at:

<http://parkplanning.nps.gov/GGNRAGMPSummary>

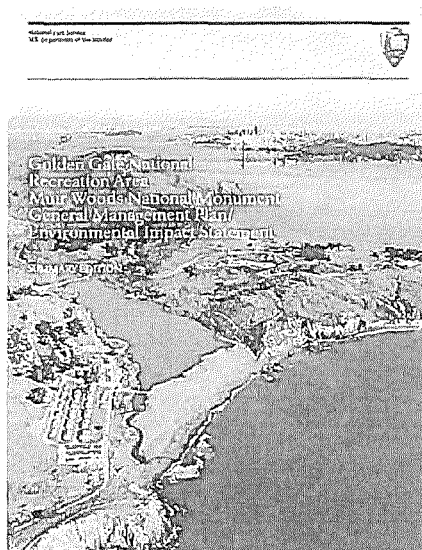
or

www.nps.gov/goga/learn/management/completed-plans-and-projects.htm

Sincerely,

Brian Aviles
Acting Chief of Planning
Golden Gate National Recreation Area
National Park Service
(415) 561-4942
brian_aviles@nps.gov

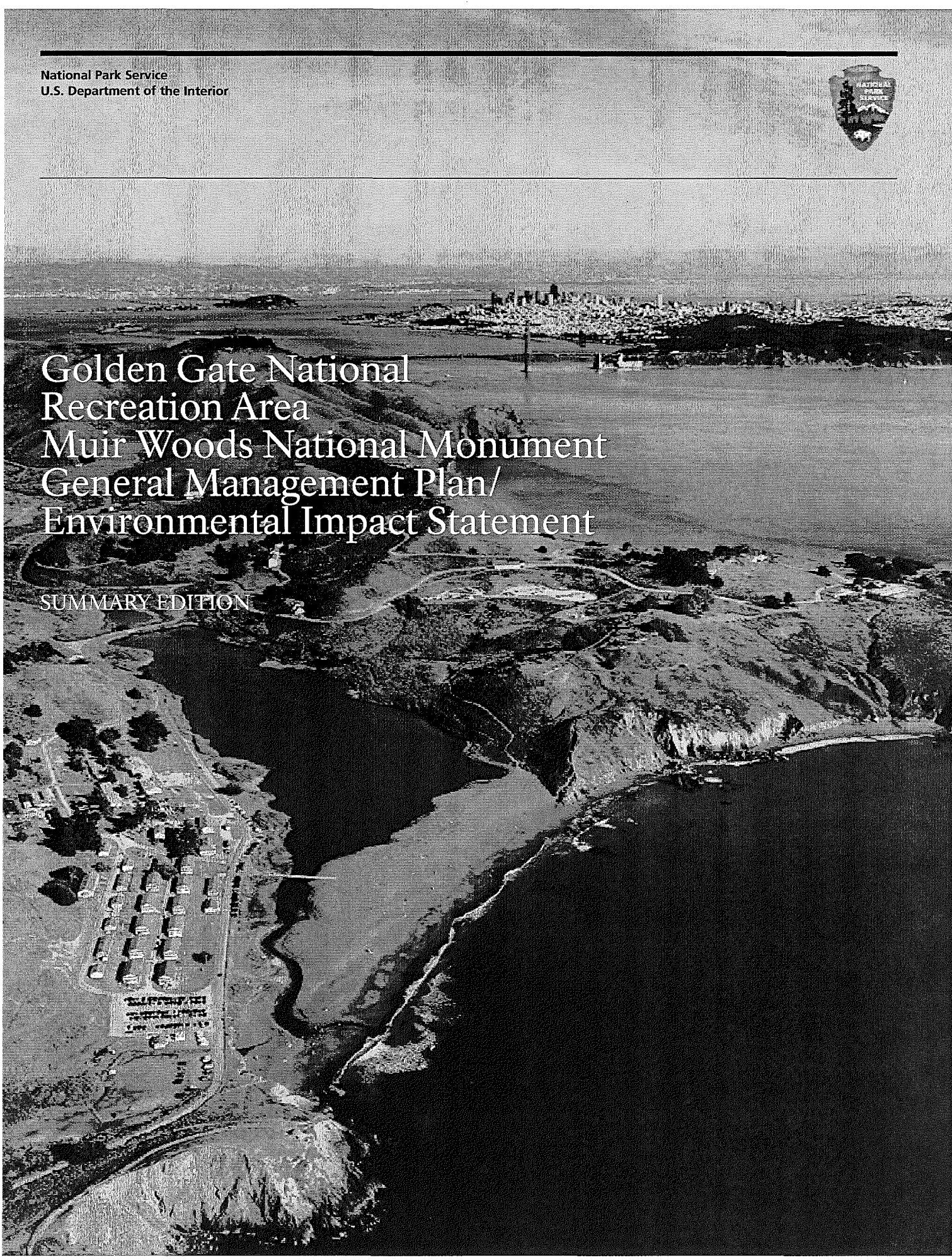
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SAN FRANCISCO
2015 AUG 31 PM 2:52





Golden Gate National Recreation Area Muir Woods National Monument General Management Plan/ Environmental Impact Statement

SUMMARY EDITION



National Park Service
U.S. Department of the Interior

Golden Gate National
Recreation Area and Muir Woods
National Monument

Fort Mason
William J. Whalen Building
San Francisco, California 94123

A Guide to this Document

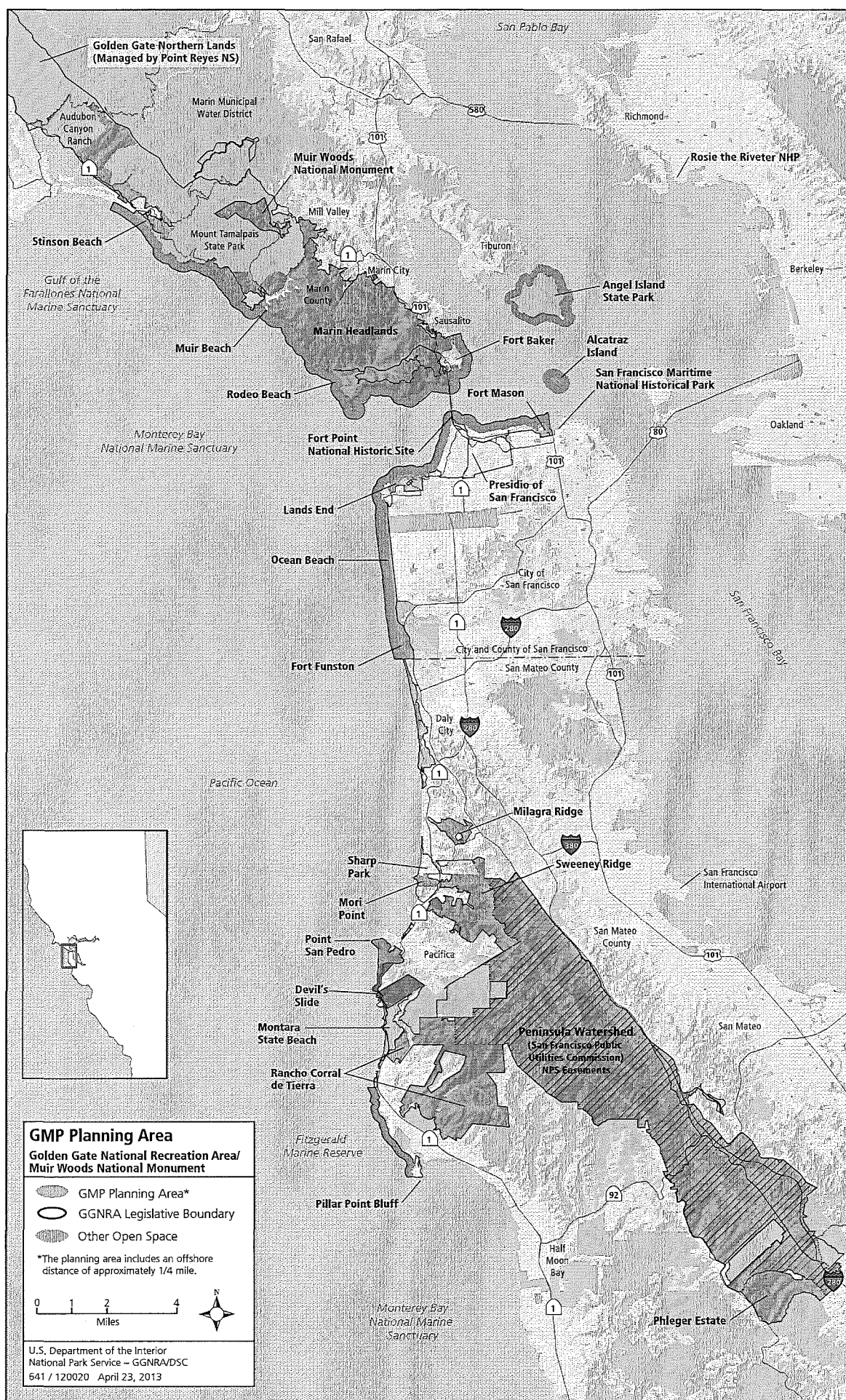
To view the full General Management
Plan / Environmental Impact Statement
or to download this document visit:
nps.gov/goga

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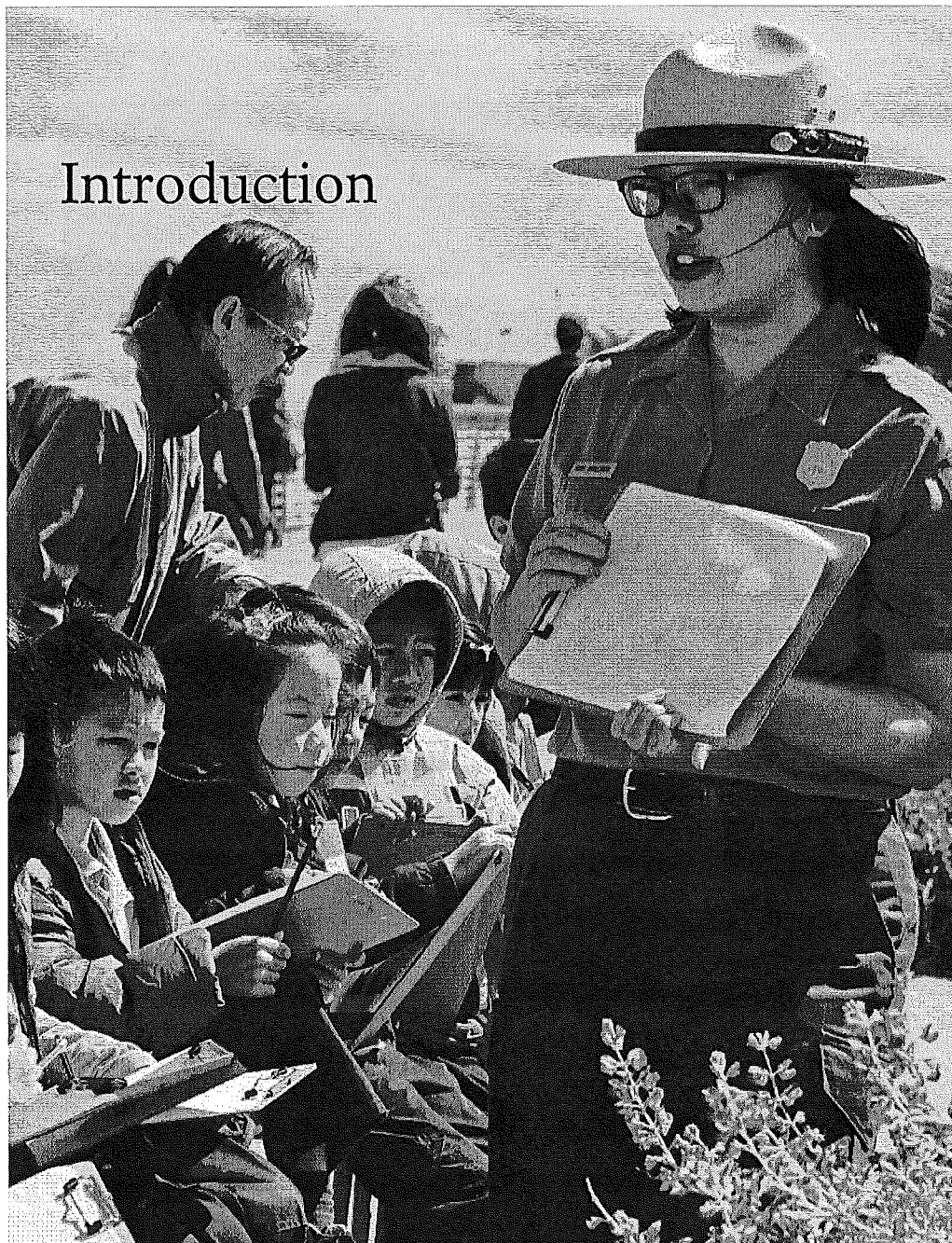
General Management Plan/
Environmental Impact
Statement

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Introduction



Introduction

Over 30 years ago, the National Park Service adopted a plan outlining the future of Golden Gate National Recreation Area, then a new and different park that brought the national park system to a large urban area. Because of the size and diversity of the San Francisco Bay Area community and the National Park Service commitment to a pioneering public involvement process, it took five years to prepare the plan. This diligence was a success and the final plan won the unanimous support of the community. That plan, along with several amendments, has firmly guided the preservation and enhancement of Golden Gate National Recreation Area for three decades.

It is not unusual for many long-range plans to just sit on the shelf and gather dust—usually as a result of inadequate funding to implement the dreams they offer, but also because of changing conditions and fading public support. When the future of the Presidio's Crissy Field was being discussed early in the planning process, one member of the park's advisory commission confided that the National Park Service would never get the funds to improve it, especially considering demolition and toxic cleanup costs. Today Crissy Field stands as an international standard for waterfront restoration and is a top visitor destination.

Success stories like Crissy Field happen because of the appeal and popularity of park resources, enhanced by the efforts of the Golden Gate National Parks Conservancy and the resultant financial support of generous members of the community.

When considering the transformational expectations offered by the 1980 General Management Plan, it has been a remarkable success. In addition to Crissy Field, the visions for Alcatraz Island, Fort Mason, Cliff House, Lands End, Fort Baker, and much of the Marin Headlands have been achieved.

Today, Golden Gate National Recreation Area constitutes one of the largest urban national parks in the world, extending north of the Golden Gate Bridge to Tomales Bay in Marin County and south to Half Moon Bay in San Mateo County. These lands are also coastal preserves that encompass many miles of bay and ocean shoreline.

The park has an abundance of historical and cultural assets, including sites such as early fortifications on Alcatraz Island, Forts Cronkhite and Barry in the Marin Headlands, Fort Mason, Fort Point, and the Presidio of San Francisco. These sites comprise a variety of archeological resources, military batteries, and other historic structures that present a rich history. Chronicles of American Indian settlements, the frontier of the Spanish Empire, the Mexican Republic, evolution of U.S. coastal fortifications, maritime history, 19th century and early 20th century agriculture and ranching, the U.S. Army in World War I and World War II, the California Gold Rush, Buffalo Soldiers, and the growth of San Francisco are told in the settings in which they occurred.

Golden Gate National Recreation Area is also rich in natural resources. The park includes 19 types of ecosystems in numerous distinct watersheds and is home to over 1,200 known plant and animal species. The park provides habitat for many sensitive, rare, threatened, or endangered species, including the Mission blue butterfly, northern spotted owl, and California red-legged frog. Coho salmon and steelhead trout inhabit the clean waters of Redwood Creek as it flows through Muir Woods National Monument.

Each year 16 to 20 million visitors explore the park. Visits to Muir Woods National Monument and Alcatraz Island are high priorities for many people. Trips to the park account for nearly 50% of all visits to the 29 national park system units in California.

The first plan served to shape a new park and reach a consensus on the definition of its identity. This document will serve to fine tune and expand the vision for a maturing national park and will shape and define new areas being added to the park.

Each year, park visitors contribute hundreds of millions of dollars to the Bay Area economy. This money directly sustains the revenue stream and jobs at hotels, restaurants, and stores that serve park visitors. Economic modeling indicates that in 2010, park visitors spent \$260 million in the local economy and supported 1,500 local jobs (Stynes 2011).

In looking back at the 1980 General Management Plan and where the park is today, there appears to be only one major goal yet to be fully accomplished—the ambitious transportation proposals contained in the document. Lack of funding and jurisdictional issues have hindered their accomplishment. However, one of the principal goals of this element of the plan was to provide access to the park for underrepresented populations. Other strategies have apparently made progress in reaching that goal, as general observations indicate that increasing numbers of young people from underrepresented groups are visiting the park. It can be safely assumed that this apparent trend is strengthened by the many educational and volunteer programs managed by the park and park partners.

It is our goal to continue this trend. Golden Gate National Recreation Area and Muir Woods National Monument are in one of the most demographically diverse regions in the United States. In addition, demographic trends forecast a dramatic increase in the diversity of the statewide population and in the number of residents who are less than 18 years of age. As a result, the park is uniquely situated to reconnect people with the national parks, with a goal of reaching a 21st century audience—more diverse and younger than today's national park visitor—and sustaining their engagement.

The impacts of Golden Gate National Recreation Area are not contained solely within its borders. The park plays a large role in contributing to the quality of life of Bay Area residents by providing open space as well as recreational opportunities and community outreach, education, and resource stewardship programs. In terms of economics, the park has the potential to generate economic activity in a variety of ways that benefit gateway communities in the three adjacent counties.

Even before the 1980 General Management Plan was approved, the park was growing. Legislation for a boundary expansion was passed by Congress in 1978, and since then various acts of Congress have added many additional acres to the park. Research and management activities have revealed new resource values, both cultural and natural. Visitation has increased and new activities have put unanticipated pressures on park resources. In short, today's park is vastly different from the one depicted in the 1980 General Management Plan. The first plan served to shape a new park and reach a consensus on the definition of its identity. This document will serve to fine tune and expand the vision for a maturing national park and will shape and define new areas being added to the park.

Purpose and Need

The purpose of this general management plan (GMP) is to guide planning and decision-making at Golden Gate National Recreation Area and Muir Woods National Monument for the next 20 years. The first general management plan, completed in 1980, is now more than 30 years old. Since the completion of that first plan, the issues, opportunities, and challenges associated with the park and monument have significantly changed. In addition, park managers have had 30 years to better understand the natural and cultural resources of the park and monument and the changing needs of park visitors.

This new General Management Plan / Environmental Impact Statement (GMP/EIS) will serve as a foundation and framework for the management of these park lands. The plan articulates the desired future conditions for park resources and visitor experience that will best fulfill the legislative and presidential mandates that established these park units as part of the national park system.

This plan has been developed by an interdisciplinary team in consultation with NPS offices; park partners; tribal, federal, state, and local agencies; and other interested organizations. There has been substantial input and participation from the general public. These public involvement and consultation efforts helped to ensure that the decisions made through this planning process are widely supported and sustainable over time. A completed general management plan represents an agreement with the citizens of the United States about how these lands and facilities will be managed. The plan will be a blueprint for the future.

The "Planning Issues" section of this general management plan provides details of issues, opportunities, and challenges. Generally, the overall need for a new general management plan has arisen because of the following:

- The park has significantly expanded in size and includes many new lands in San Mateo County. This planning process is based on a comprehensive look at the park as a whole rather than its individual sections. This comprehensive parkwide approach will help ensure that management of natural and cultural resources and visitor experience is consistent across all park areas.
- There is an increased public demand for access to and use of open spaces within the ever-growing San Francisco Bay Area. The general management plan provides a regional collaborative approach to open space preservation.
- The changing demographics in the Bay Area are bringing notable shifts in park visitation, uses, and trends. The general management plan provides desired conditions that will guide the decision-making needed to manage the anticipated increase in visitation.
- Through research and park management over the years, the park has gathered a considerable amount of new information and knowledge regarding resources and visitor use. This new awareness is incorporated into the desired conditions, proposed management actions, and policies of this general management plan.
- In recent years, climate change has become better understood and its effects more evident on both ecological systems and cultural resources. The general management plan considers the potential impacts of climate change to park operations and visitor use and identifies the management actions necessary to guide efforts to minimize the park's carbon footprint.

A completed general management plan represents an agreement with the citizens of the United States about how these lands and facilities will be managed. The plan will be a blueprint for the future.

The relationship between the General Management Plan and the separate Dog Management Plan is clarified in the Record of Decision.

- Visitor access to the park continues to evolve as the local transportation infrastructure changes. The strategies that were identified in 1980 continue to be explored; new ideas and techniques are also identified to help address sustainable options for park access and strategies to reduce traffic congestion around and within the park.
- To comply with federal law, the plan specifies the types and intensities of projected development, including anticipated costs. This is important, as the availability of federal funds may be limited over time.

The General Management Plan / Environmental Impact Statement provides recommendations regarding the use of many park facilities; however, future decisions about the specific use of individual facilities will be based on a number of criteria and opportunities for maximizing the life and value of these important public resources. Facilities could serve a variety of uses over the 20-year life of the general management plan consistent with the surrounding management zoning and NPS policy.

Implementation of the plan will depend on future NPS funding levels and service-wide priorities and on partnership funds, time, and effort. The approval of a general management plan does not guarantee that the funding and staffing needed to implement the plan will be forthcoming. Full implementation of the plan could be many years in the future.



Foundation Statement

Each unit of the national park system has a formal statement of its core mission that provides basic guidance for all planning and management decisions—a foundation for planning and management. It provides information necessary to effectively manage the park over the long term and to protect park resources and values that are integral to the purpose and identity of the park unit. In short, the foundation statement expresses what is most important about the park.

The foundation statement for GGNRA and Muir Woods describes the core mission of the two park units by identifying the purpose, significance, fundamental resources and values, and key interpretive themes. These components are briefly defined below and described on the following pages:

- The Park Purpose identifies the specific reason for establishment of a particular park. It is drawn from the enabling legislation for GGNRA and the Presidential Proclamation for Muir Woods.
- Significance Statements express why the park unit's resources and values are important enough to merit designation as a unit of the national park system.
- Fundamental Resources and Values are those that warrant primary consideration during planning and management processes because they are essential to achieving the purpose of the park unit and maintaining its significance.
- Interpretive Themes are often described as the key stories or concepts that visitors should understand after visiting the park unit.



Golden Gate National Recreation Area Park Purpose

The purpose of Golden Gate National Recreation Area is to offer national park experiences to a large and diverse urban population, while preserving and interpreting the park's outstanding natural, historic, scenic, and recreational values.



Recreational and Educational Opportunities

Significance

The continuum of park resources at the doorstep of the San Francisco Bay Area provides an abundance of recreational and educational opportunities.

Fundamental Resources and Values

- **Diverse Park Settings:** The diversity of settings, from remote to urban, provides visitors with active and passive recreational and educational opportunities, including participation in park stewardship.
- **Park Access:** A system of designated trails and scenic park roads supports access to sites that provide visitors with a broad range of activities and varied experiences.

Interpretive Theme

The park provides diverse recreational and educational opportunities from contemplative to active pursuits, including participation in stewardship and volunteer activities. Its proximity allows an urban population to connect with nature and history.

Coastal Corridor

Significance

The remnant of undeveloped coastal corridor comprising marine, estuarine, and terrestrial ecosystems supports exceptional native biodiversity and provides refuge for one of the largest concentrations of rare, threatened, and endangered species in the national park system.

Fundamental Resources and Values

- **Ocean and Bay Environment:** Oceanic conditions, such as tides, currents, waves, surf, upwelling, and sea level, influence Golden Gate National Recreation Area's coastal environment, including climate and the land.
- **Coastal Ecosystems:** Golden Gate National Recreation Area contains a rich assemblage of coastal native plant and animal habitats that includes forests, coastal scrub, grassland, freshwater, estuarine and nearshore marine habitats, beaches, coastal cliffs, and islands.
- **Threatened and Endangered Species:** Golden Gate National Recreation Area supports one of the largest numbers of federally listed threatened and endangered species in the national park system. This island of refuge is due to the protected confluence of unique and diverse habitats adjacent to the urban Bay Area.
- **Water Resources:** Golden Gate National Recreation Area's water resources support coastal corridor ecosystems, which consist of groundwater sources (aquifers and springs); freshwater systems (streams, lakes, and ponds); coastal, estuarine, and marine water resources (the Pacific Ocean and San Francisco Bay) and other wetlands.

Interpretive Theme

In a world of diminishing biological diversity and threatened natural resources, Golden Gate National Recreation Area preserves islands of biodiversity within and near a large urban area. The accelerating rate of global climate change threatens even these remnants.

Foundation Statement

Military Installations and Fortifications

Significance

The park includes one of the largest and most complete collections of military installations and fortifications in the United States, dating from Spanish settlement in 1776 through the 20th century. These installations have served as command posts for the U.S. Army in the Western United States and the Pacific Ocean. This long period of military presence has yielded one of the most extensive collections of historic architecture in the national park system.

Fundamental Resources and Values

- **Fortifications and Military Installations:** Golden Gate National Recreation Area includes cultural landscapes, historic structures, archeological sites, and museum collections, including historic fortifications and military installations.

Interpretive Theme

Coast defense posts are at the heart of park lands and are a major reason the park is preserved today. Although no hostile shot was ever fired, every major type of military fortification and architecture represented here demonstrates evolving defense technology. War, peace, and the nature of protection have shaped the country in the past and will continue to do so.

Scenic Beauty

Significance

The headlands of the Golden Gate have long been recognized for their outstanding scenic qualities. The remarkable convergence of land and sea and of bay and ocean—combined with the palpable energy of 16 major rivers merging—create a spectacle that is truly unique.

Fundamental Resources and Values

- **Dramatic Settings.** In concert with the open lands that frame it, the Golden Gate serves as the backdrop to the San Francisco metropolitan area. The dynamic contrast between urban environments and undeveloped spaces ranging from the open waters of the Pacific Ocean and San Francisco Bay to beaches, estuaries, headlands, and valleys contributes greatly to the scenic experience enjoyed by area residents and visitors alike.
- **Compelling Historical Stage.** With its exceptional diversity of natural settings and central role in many significant chapters from America's past, the Golden Gate instills a continuous sense of wonder and appreciation.

Interpretive Theme

The powerful positive influences that park land and undisturbed open space can exert on urban settings (and residents) constitute an important interpretive message. The scenic beauty of the park's historic and natural undeveloped landscapes inspired a grassroots movement that led to their protection. Proposed development that would have destroyed these lands sparked Bay Area community members to organize and ultimately preserve the open spaces that contribute so much to their quality of life.

Physical Landforms

Significance

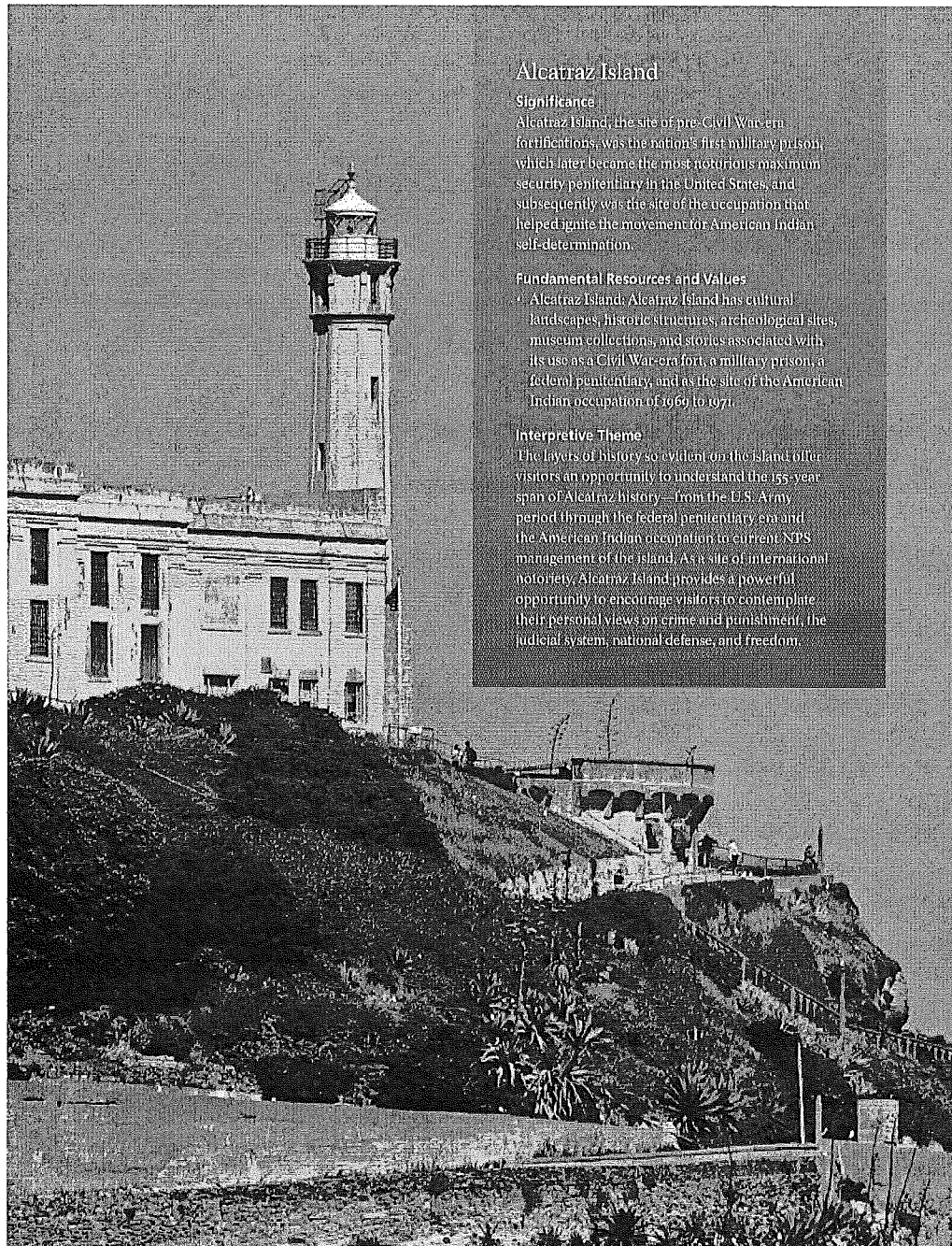
The convergence of the San Andreas Fault, San Francisco Bay at the Golden Gate, and the California coastline creates a dynamic environment of exceptional scientific value.

Fundamental Resources and Values

- **Geologic Resources:** Golden Gate National Recreation Area's geologic resources include faults, plate margins, and a subduction zone; a diversity of rock types and deposits representing more than 100 million years of earth's history; and complex geologic processes that continue to shape the landscape.

Interpretive Theme

The park's underlying natural geologic systems and processes and the resulting effects on people and the environment, link the park to the highly visible and significant geologic forces around the world.



Alcatraz Island

Significance

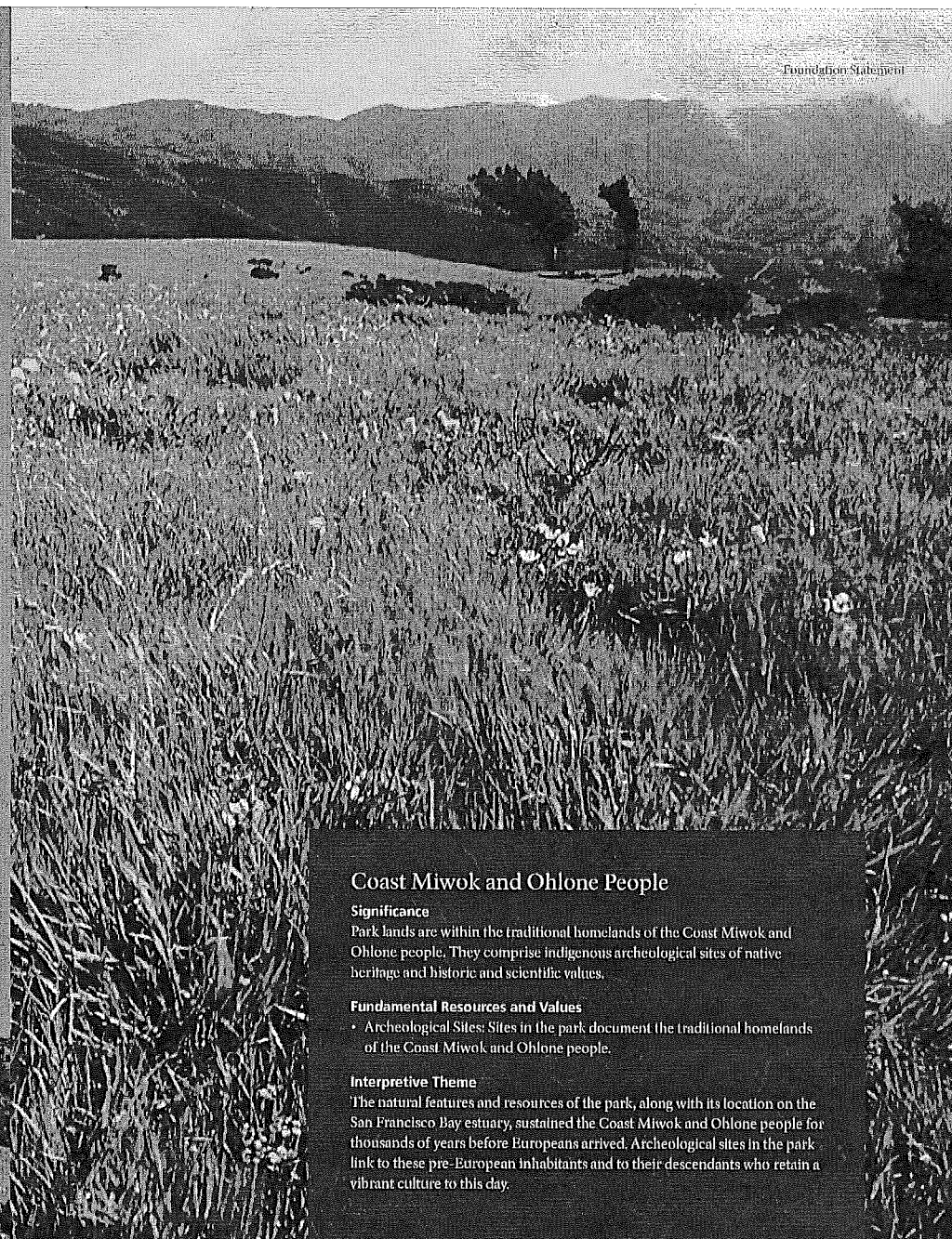
Alcatraz Island, the site of pre-Civil War-era fortifications, was the nation's first military prison, which later became the most notorious maximum security penitentiary in the United States, and subsequently was the site of the occupation that helped ignite the movement for American Indian self-determination.

Fundamental Resources and Values

- Alcatraz Island: Alcatraz Island has cultural landscapes, historic structures, archeological sites, museum collections, and stories associated with its use as a Civil War-era fort, a military prison, a federal penitentiary, and as the site of the American Indian occupation of 1969 to 1971.

Interpretive Theme

The layers of history so evident on the island offer visitors an opportunity to understand the 155-year span of Alcatraz history—from the U.S. Army period through the federal penitentiary era and the American Indian occupation to current NPS management of the island. As a site of international notoriety, Alcatraz Island provides a powerful opportunity to encourage visitors to contemplate their personal views on crime and punishment, the judicial system, national defense, and freedom.



Foundation Statement

Coast Miwok and Ohlone People

Significance

Park lands are within the traditional homelands of the Coast Miwok and Ohlone people. They comprise indigenous archeological sites of native heritage and historic and scientific values.

Fundamental Resources and Values

- Archeological Sites: Sites in the park document the traditional homelands of the Coast Miwok and Ohlone people.

Interpretive Theme

The natural features and resources of the park, along with its location on the San Francisco Bay estuary, sustained the Coast Miwok and Ohlone people for thousands of years before Europeans arrived. Archeological sites in the park link to these pre-European inhabitants and to their descendants who retain a vibrant culture to this day.



Muir Woods National Monument Park Purpose

The purpose of Muir Woods National Monument is to preserve the primeval character and ecological integrity of the old-growth redwood forest for scientific values and inspiration.

Significance

Muir Woods National Monument preserves the last remnant old-growth redwood forest in proximity to metropolitan San Francisco that retains its primeval character.

The establishment of the monument is an important demonstration of early 20th-century conservation history.

Fundamental Resources and Values

- **Old Growth:** Muir Woods National Monument preserves plant and animal species and the natural processes associated with the once-abundant coastal redwoods ecosystem.
- **Conservation Movement:** The efforts of the people who ensured the preservation of this old-growth redwood forest continue to inspire conservation and stewardship actions today.

Interpretive Theme

The majestic, primeval old-growth redwoods of Muir Woods invite visitors, in the words of namesake John Muir, to "come to the woods, for here is rest." The forest ecosystem of these towering trees and the creek beneath them supports an abundance of life. This remnant of the Bay Area's once-abundant redwood forests inspires visitors through its seminal conservation story, today welcoming travelers from around the world to have what is, for many, their first wildlands experience.

Foundation Statement

Guiding Principles for Park Management

In addition to the many laws, policies, and directives that govern management of all units of the national park system, the leadership at Golden Gate National Recreation Area and Muir Woods National Monument has highlighted some of the principles that are most deeply rooted and distinctive at this park. These originate from the 1916 Organic Act that established the National Park Service to *"...promote and regulate the use of the Federal areas known as national parks, monuments, and reservations... by such means and measures as to... conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."*

Sustainability

The National Park Service will continue to learn about and use practices that help sustain park resources. Sustainability will be fundamental to the facilities, projects, programs, and operations of the park, using sound environmental management practices. The National Park Service will seek opportunities to promote sustainability and stewardship to park visitors, neighboring communities, and stakeholders.

Community-Based Stewardship

The National Park Service is committed to ongoing involvement of individuals and organizations in understanding, caring for, and preserving the park's natural habitats, historic places, and trails. This community stewardship brings the commitment to preserve our common heritage and public lands—national treasures that can best be sustained by the efforts of many.

Civil Engagement

The National Park Service is dedicated to ongoing, dynamic conversations about the contemporary relevance of park resources and will also provide opportunities for meaningful involvement to promote better understanding and communication, discuss concerns, and express values and preferences when park decisions and policies are being developed and implemented.

Partnerships

The National Park Service will continue to build on the legacy of the many partnerships that have enhanced the ability to protect resources and serve the public since the park was established. Through mutual collaboration, shared values, and learning, these partnerships have created outcomes beyond any one organization's individual capacity. Partnerships will continue to be an important way to accomplish the park's mission and build a community of stewardship.

Regional Collaboration

In working to preserve the park's resources unimpaired for future generations, cooperative relationships with managers of adjacent public lands and watersheds; tribal, state, and local governments; community organizations; and private landowners will be established and maintained. To ensure that watersheds, ecosystems, historic properties, prehistoric sites, viewsheds, and trail and transportation systems that extend beyond park boundaries are considered holistically, in order to best preserve important park resources, provide equitable and sustainable access, and advance the goal of creating a seamless network of protected lands, collaborative relationships will be built and sustained.

Inclusion

Recognizing the special opportunities and obligations resulting from the park's location within a region of great demographic and socioeconomic diversity, the National Park Service will strive to ensure that Golden Gate National Recreation Area is a "park for all." Working with, rather than for, various community partners, the National Park Service will undertake proactive strategies that make the park welcoming and accessible to those at every economic stratum, people with disabilities, and ethnic and cultural communities who have not traditionally visited national parks in numbers proportionate to the changing demographics of California and the nation.

Management Concepts and Zones

Connecting People with the Parks

The emphasis of this concept is to reach out and engage the community and other visitors in the enjoyment, understanding, and stewardship of park resources and values. Park management would focus on ways to attract and welcome visitors; connect people with resources; and promote understanding, enjoyment, preservation, and health—all as ways to reinvigorate the human spirit. Visitor opportunities would be relevant to diverse populations now and in the future.

Rationale

This concept emphasizes park management's commitment to the founding idea of "parks to the people" and the park's fundamental purpose of bringing national park experiences to a large and diverse urban population. Improving connections between the park and visitors is fundamental to achieving the park's purpose and to maintaining the public's continued interest and support.

Goals

VISITOR EXPERIENCE

- Actively seek opportunities to respond to the needs and interests of the diversity of visitors.
- Encourage visitors to engage in a wide range of opportunities and experiences in a diversity of settings.
- Enhance outreach and access to and within the park and monument and make them welcoming.
- Foster the visitor's deep personal connection to the park and discovery of the values and enjoyment of the natural environment.
- Encourage hands-on stewardship through visitor opportunities that promote personal health and responsibility.

CULTURAL RESOURCES

- Maximize adaptive reuse, rehabilitation, stabilization, and interpretation of cultural resources (structures, landscapes, archeological sites, ethnographic resources, and museum collections) to support visitor enjoyment, understanding, and community connections.
- Work with the public, park partners, local communities, historical organizations, and regional collaborators to steward, preserve, and protect cultural resources.
- Preserve and protect cultural resources so that visitors can connect with and appreciate these resources and their stories.

NATURAL RESOURCES

- Maintain the integrity and diversity of natural resources and systems and mitigate the effects of climate change and urban pressures.
- Enhance the public's access to natural resources to promote visitor understanding and appreciation.
- Integrate natural resource preservation and concepts with visitor stewardship opportunities to deepen visitor understanding.
- Increase visitor understanding, awareness, and support for park resources through education and interpretive opportunities that include messages about the sensitivity of park resources, park regulations, and appropriate visitor behavior.

Focusing On National Treasures

The emphasis of this concept is to focus on the park's nationally important natural and cultural resources. The fundamental resources of each showcased site would continue to be managed at the highest level of preservation to protect the resources in perpetuity and to promote appreciation, understanding, and enjoyment of those resources. Visitors would have the opportunity to explore the wide variety of experiences that are associated with many different types of national parks—all in this park. All other resources would be managed to complement nationally significant resources and associated visitor experience.

Rationale

This concept highlights the park's variety of nationally significant resources. By distinguishing the nationally significant resources and promoting the NPS identity, the objective of bringing exemplary national park experiences to an urban population would be met. The concept would also allow the National Park Service to focus management of park resources, visitor experience, and partnerships, giving priority to the most significant sites.

Goals

VISITOR EXPERIENCE

- Provide visitors with opportunities to explore, learn, and enjoy the park's unique resources and history.
- Allow the park's distinctive resources and associated narratives to shape recreational opportunities.
- Emphasize active public participation in stewardship programs at the showcased sites.
- Provide visitors with opportunities for understanding and enjoying the national park experience.

CULTURAL RESOURCES

- Emphasize the fundamental resources that contribute to the national significance of the park, including national historic landmarks. Manage all other resources to complement significant resources and visitor experience.
- Tie the associated cultural resources, museum collections, and histories to the showcased sites.
- Preserve and protect cultural resources to highlight the interpretive and educational values and provide, wherever possible, direct contact with the resources.

NATURAL RESOURCES





- Emphasize the preservation of fundamental natural resources that contribute to the significance of each park unit. Manage all other resources to complement the distinctive resources and experiences.
- Protect or restore the integrity of fundamental natural resources and processes that support the significance of each park unit.
- Manage distinctive natural resources to ensure their ecological integrity while providing opportunities to engage visitors in hands-on stewardship and exploration.





The Connecting People with the Parks management concept applies to Marin, San Francisco and San Mateo counties.

The Focusing on National Treasures management concept applies to Alcatraz Island and Muir Woods National Monument.

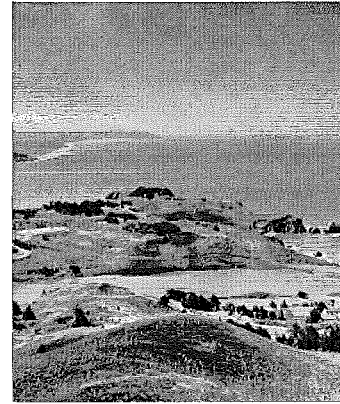
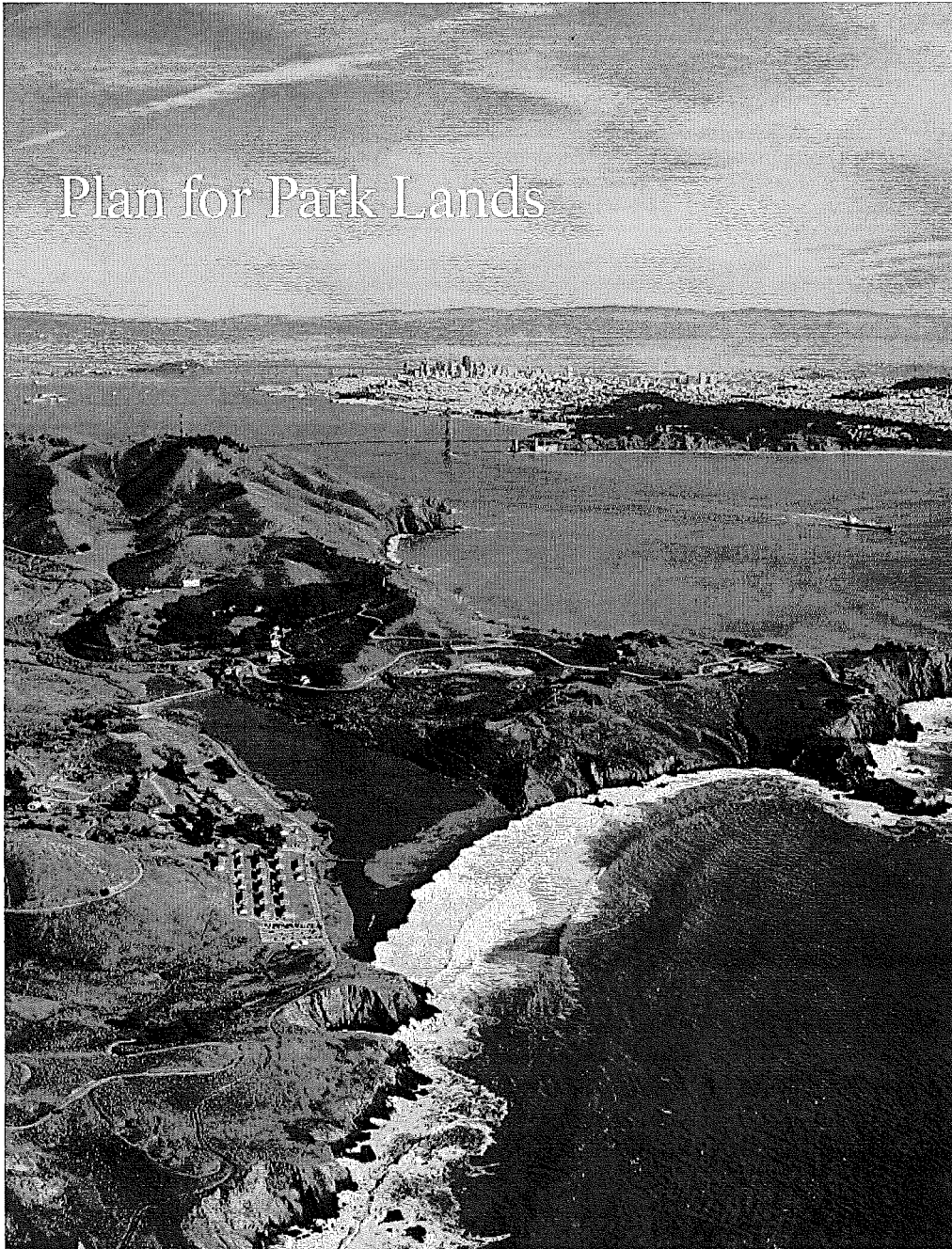
General Summary of Management Zones

Management zones are the heart of the general management plan. Each zone defines a set of desired conditions for natural and cultural resources, visitor experience, and general levels of development. These desired conditions are different in each management zone and reflect the overall focus of that particular zone. Eight management zones have been developed.

| RESOURCE | Diverse Opportunities Zone | Scenic Corridor Zone | Evolved Cultural Landscape Zone | Historic Immersion Zone |
|-------------------------------|--|---|---|---|
| SUMMARY | This management zone provides a range of natural and historic settings and facilities to welcome and support a variety of opportunities appropriate to the setting. Significant fundamental park resources would be preserved while different levels of visitor use would be accommodated. Visitors would have a wide range of educational, interpretive, and recreational opportunities to enjoy and appreciate the park's resources. Rare and exceptional natural resources, processes, systems, and values would be preserved and enhanced. | This management zone includes scenic trails, roads, and coastlines that provide sightseeing and related recreational opportunities. Resources could be modified in this zone and facilities would highlight and enhance the natural, cultural, and scenic values, as well as provide for a safe tour route. | This management zone would preserve significant historic, archeological, architectural, and landscape features while being adaptively reused for contemporary park and partner needs. Cultural resources, as well as the surrounding natural resources that are often integral to the historic site, would be preserved and interpreted. This zone could contribute to visitor enjoyment and exploration of the historic values and events while providing for other types of uses. | This management zone would preserve historic sites, structures, and landscapes that are evocative of their period of significance. Selected exteriors and designated portions of interior spaces would be managed to protect their historic values and attributes. Visitors would have opportunities to be immersed in the historic setting to explore history with direct contact to cultural resources, complemented by rich interpretation of past stories and events. |
| EXAMPLES OF PARK SITES | Fort Funston Fort Cronkhite Great Meadow Ocean Beach: North | Nearshore Bay and Ocean Environment Conzelman Road Panoramic Highway | Kirby Cove Lands End Upper Fort Mason Seacoast Fortifications | Alcatraz Island Nike Missile Launch Site in Marin Headlands |
| |  |  |  |  |
| | KIRKE WRENCH/NPS | KIRKE WRENCH/NPS | KIRKE WRENCH/NPS | DAN NG/NPS |

| Interpretive Corridor (Muir Woods) | Natural Zone | Sensitive Resources Zone | Park Operations Zone | RESOURCE |
|---|---|---|---|-------------------------------|
| This management zone would preserve the monument's natural character and would be richly interpreted through a variety of means. Visitor use would be managed to preserve important natural and cultural resources and their associated values and could involve controlled access. | This management zone would retain natural, wild, and dynamic characteristics and ecological functions. Natural resources would be managed to preserve and restore resource integrity while providing for backcountry types of visitor experiences. Visitors would have opportunities to directly experience the natural resources primarily from trails and beaches. Visitor use would be managed to preserve resources and their associated values and could involve controlled access by means of fencing off sensitive areas. Modest facilities that support management and visitor use within this zone, such as a trailhead, could be placed on the periphery of the zone. | This management zone would consist of fundamental natural resources that are highly sensitive to a variety of activities and would receive the highest level of protection. Resources would be managed to preserve their fundamental values while being monitored and often studied for scientific purposes. Access to these areas would be highly controlled. These areas could be subject to closures, and access could be restricted to the less sensitive edges of the zone. External threats to resources would be aggressively addressed. | This management zone would primarily support developed facilities for park and partners operations and maintenance functions. This zone would be managed to provide facilities that are safe, secured, and appropriate for functions required for park management. Access to these areas for visitors would be controlled and limited to organized meetings, programs, and access to park administration. | SUMMARY |
| Muir Woods: Redwood Creek Corridor | Tennessee Valley Gerbode Valley Rancho Corral de Tierra Ocean Beach: South | Muir Woods: Upper hillsides of Redwood Canyon Rodeo Lagoon Selected Coastal Areas | Upper Fort Mason East Fort Miley Fort Funston Rodeo Lagoon | EXAMPLES OF PARK SITES |
|  |  |  |  | |
| ALISON TAGGART-BARONE/NPS | ALISON TAGGART-BARONE/NPS | KIRKE WRENCH/NPS | KIRKE WRENCH/NPS | |

Plan for Park Lands



Park Lands in Marin County

Park Lands in Marin County

Connecting People with the Parks

Overview

In this plan, park managers would preserve the natural, cultural, scenic, and recreational qualities that are enjoyed today and would improve access to the park for all visitors. The park would enhance the facilities that support visitor experience in what has been called "the wilderness next door." Park managers would work to preserve and restore these interconnected coastal ecosystems through collaborative partnerships with other land management agencies in the region. A stronger national park identity and message would welcome people as they arrive, and improved orientation and information services would inform them of the variety of experiences available in the park. Important park operational uses would remain in the Marin Headlands, and visitor facilities at these sites would be improved.

The park lands in Marin County are an outdoor recreationist's paradise, with an extensive network of trails through valleys, atop windblown coastal bluffs, along rocky shores, and among redwoods and oaks. Sustainable approaches to rehabilitating facilities that are in place today would improve trailheads and trails as well as roads, parking lots, campsites, picnic areas, restrooms, and other structures at popular destinations such as the coastal fortifications. Some new facilities would be developed to improve visitor services and support the growing stewardship programs. Park partners would continue to play important roles in preserving resources and offering programs and services to visitors in support of the park's mission. Public transportation and multimodal access to all park sites would be improved.

Stinson Beach North to Bolinas-Fairfax Road

Diverse Opportunities Zone (Beach, Dunes, and Developed Area)

At Stinson Beach, the park's only designated swimming beach with seasonal lifeguards, the setting and facilities would be improved to better support recreation, expand the creek buffer to protect endangered species habitat, and enhance the dunes. Sustainable new facilities would replace deteriorated restrooms, showers, picnic areas, and parking lots. The siting of any new facilities would first be evaluated for long-term viability and cost effectiveness, taking present and future climate change influences into consideration. A visitor contact facility could combine existing services (food service, equipment rental) and interpretive and educational programs. Visitor facilities would be removed or relocated if it becomes infeasible to maintain them because of climate change. Maintenance and public safety offices with staff housing would be retained.

The park would explore ways to improve visitor access to Stinson Beach such as increasing transit on weekends during the peak season and enhancing regional trail connections. The park would also continue to work with the community and Marin County to manage parking and reduce traffic using congestion management tools.

The park would continue to work with the Stinson Beach Community Services District, Marin County, Gulf of the Farallones National Marine Sanctuary, and the local community to find sustainable solutions to flooding and floodplain functions, water use, water quality, wastewater treatment, and sea level rise related to climate change where these affect park resources. More detailed site planning for proposed improvements will involve working with the community to identify alternatives for vulnerable facilities, including off-site locations and increased transit service to offset reduced parking.

Natural Zone (Surrounding Park Land North to Bolinas-Fairfax Road, Except Stinson Beach)

This area would be managed to protect and restore the coastal ecosystems, and contribute to the restoration of natural processes that affect Bolinas Lagoon. The *Bolinas Lagoon Restoration Project—Recommendations for Restoration and Management* (Gulf of the Farallones National Marine Sanctuary Advisory Council 2008) identified key actions to protect and restore Bolinas Lagoon and its watershed. Three tables identify recommendations for restoration in the Locally Preferred Plan, recommendations for management (best management practices), and recommendations for adaptive management and monitoring. Each action identifies the key land managers, including Golden Gate National Recreation Area, with a vested interest in implementation of each action. Park involvement would be required to implement restoration actions in portions of the watershed, including improving floodplain function along Easkoot Creek, at the Bolinas Y, and along the east shore of Bolinas Lagoon (e.g., Stinson Gulch), and improving transitional habitat and habitat connectivity along the east shore of the lagoon. Partnerships with neighboring ocean and land managers would be strengthened to achieve these goals across the broader landscape. The park would improve trails, trailheads, and directional signage to provide access to other nearby park lands.

State Route 1 and Panoramic Highway Area

Scenic Corridor Zone

Park lands in this area would be managed to enable visitors traveling by car, bicycle, and transit to enjoy spectacular views of the Pacific coast and natural habitats and to provide trail access to park sites.

The park would collaborate with Caltrans and Marin County, the managers of these two important access roads that pass through the park, and with California State Parks and other land management

agencies to improve the roadways and trail crossings for the safety and enjoyment of park visitors while retaining the scenic rural character. New facilities could include overlooks and trailheads with parking, restrooms, interpretive exhibits, picnic areas, enhanced trail and transit connections, and a unified wayfinding system. A small trailhead parking area could be developed in the vicinity of the former White Gate Ranch. Improvements east of Panoramic Highway in the vicinity of Homestead Hill could enhance trail and transit access to Muir Woods and other nearby park destinations. Improvements would fit with the rural character of the area. Park managers would seek to minimize impacts on natural resources caused by road use, maintenance, and drainage.

Slide Ranch

Diverse Opportunities Zone (Developed Area)

This area would be managed to enhance the environmental and farm education center and provide improved facilities for public day use of the site, including a picnic area, trail access, and a scenic overlook. Improvements would take into account the dynamic geologic conditions of the site. The siting of any new construction would first be evaluated for long-term viability and cost effectiveness, taking present and future climate change influences into consideration.

Natural Zone (Land Surrounding the Developed Area)

The landscape that surrounds the educational programs would be managed to enhance its natural and scenic values, retain flexibility to adapt to coastal geologic processes, and provide public trail use and access to the coast.

Lower Redwood Creek (Formerly Banducci Flower Farm and Surrounding Area)

Natural Zone (Majority of Lower Redwood Creek)

Park managers would continue to restore the natural coastal ecosystem and the riparian habitat of Redwood Creek while providing improved trail connections to Mount Tamalpais State Park and other area trails, including the California Coastal Trail. All unnecessary structures would be removed.

Evolved Cultural Landscape Zone (Developed Area and Adjacent Approximately 6-Acre Site)

Park managers would preserve the rural, pastoral character of the landscape. Stewardship facilities relocated from Muir Woods National Monument could be accommodated in this zone. The stewardship center, incorporating a native plant nursery and other native plant propagation areas, would reinvigorate the horticultural traditions of the site and engage the community. Existing buildings would be rehabilitated to support park programs and operations.

The National Park Service would work with California State Parks to encourage development of a small trailhead parking and picnic area near Santos Meadow and the Frank Valley horse camp, and improve access to this zone.

A sustainable approach to providing for water supply and wastewater treatment would be identified and implemented to confirm the viability of possible uses at this site. To further protect the creek's endangered salmon, park managers could collaborate with the community to increase water storage capacity for use during the dry season.

The planned improvements east of Panoramic Highway in the vicinity of Homestead Hill are clarified in the Record of Decision.

Park managers would continue to work with Marin County and California State Parks to explore realignment of Muir Woods Road to reduce impacts on Redwood Creek and repair and reopen damaged road segments.

Muir Beach

Natural Zone

The National Park Service would manage the area to restore and sustain the wetlands, creek, dunes, and lagoon with improvements for beach and trail access that preserve the natural setting. The park would continue to collaborate with the community, Muir Beach Community Services District, and Marin County to understand and address water quality issues that impact park resources. Ongoing collaboration with Green Gulch Farm managers would continue to promote compatible management of this private parcel within the park boundary.

Golden Gate Dairy and Vicinity

Evolved Cultural Landscape Zone (Developed Area Only)

The area would be managed to preserve the historic structures and pastoral character while continuing to support park and community needs. Site improvements would accommodate a small trailhead and rural transit stop and enhance the creek corridor. Equestrian facilities would be retained, with site improvements made to incorporate best management practices and protect the adjacent riparian area. The National Park Service would continue to work with the operator of the equestrian facilities to expand programs that benefit the public. Nonhistoric residences along State Route 1 could be removed if they do not contribute to essential community services or park operational needs.

The National Park Service would continue to promote regularly scheduled transit service to reduce vehicle traffic. The National Park Service would also continue to work with Caltrans to improve the safety of State Route 1 for park visitors, including traffic calming and improved pedestrian crossing, and also to complete the trail connection between Dias Ridge and Redwood Creek trails.

Natural Zone (Surrounding Uplands)

The uplands surrounding the dairy would be managed to preserve and enhance the natural setting, protect the coastal prairie and scrub habitat, and provide connections to trails to the beach and the adjacent Mount Tamalpais State Park.

Tennessee Valley and Surrounding Parklands (From Oakwood Valley to the Ocean, and Northwest To Highway 1)

Diverse Opportunities Zone (Tennessee Valley Trailhead and the Upper Stables Area)

Trailhead site improvements, including potable water, restrooms, and an improved picnic and parking area, would enhance this portal to the park that supports hiking, biking, and equestrian activities. A small food and information kiosk could be included in this area.

In collaboration with Marin County and the community, park managers would explore the feasibility of public transit service to the trailhead on peak season weekends. Park managers would also collaborate to extend and link the Tennessee Valley trail system into the surrounding community's trail network such as the Mill Valley Bike Path (San Francisco Bay Trail).

Equestrian facilities would be retained and could be expanded while protecting the historic character of the former dairy ranch. Site improvements would be made to incorporate best management practices and protect the adjacent riparian area. The National Park Service would continue to work with equestrian operators to expand programs that benefit the public.

Modest facilities could be sited within this zone that support stewardship, education, and youth programs.

Diverse Opportunities Zone (Oakwood Valley)

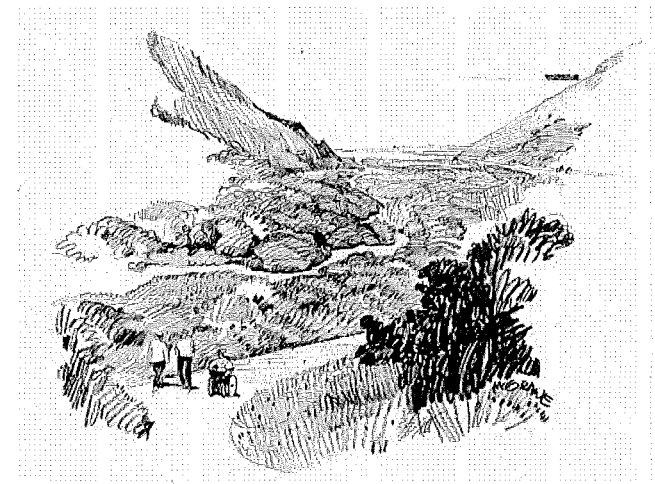
Visitor access improvements, including trailhead amenities, parking, picnicking, and restrooms, would be provided in this zone to support access to the trail system.

Natural Zone (from the Trailhead to the Ocean and the Surrounding Uplands Including Oakwood Valley)

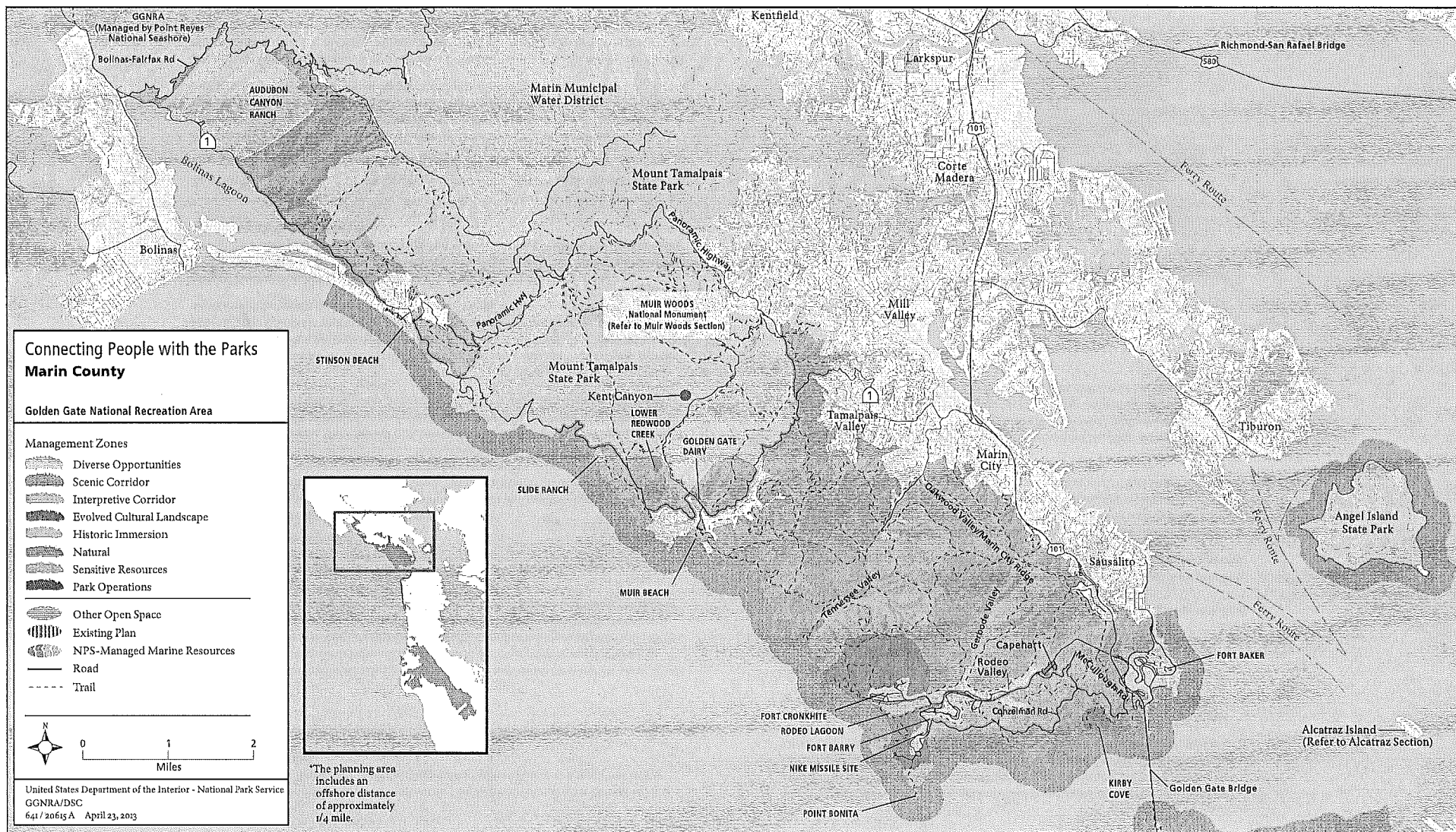
The main multiuse trail would be enhanced to support ongoing use and improve accessibility. Unnecessary management roads could be converted to trails and natural processes restored.

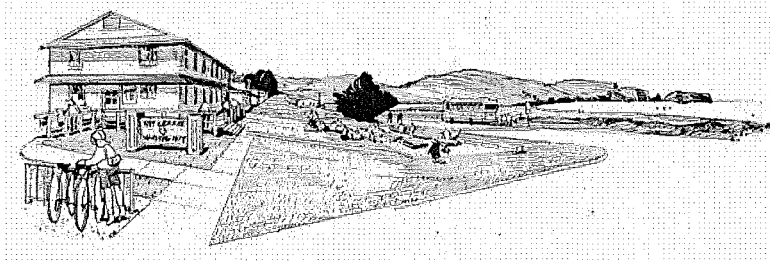
Hike-in camping would be retained at Haypress Meadow, and primitive camping for park work groups could be retained in its current location, along with the lower restroom. All other structures in lower Tennessee Valley, including buildings, paddocks, dams, and constructed ponds, would be removed and native habitats restored. The park horse patrol would be relocated and other existing programs could be accommodated in other park locations.

The scenic hills that surround the main trail corridor and trailhead and extend to the north and south would be managed to preserve and enhance the expanse of undeveloped coastal habitat, outstanding natural features, and the scenic beauty of a large contiguous natural area. Trail improvements would create a more sustainable trail system that would provide access to the variety of settings.



Valuable habitat created by removing obsolete facilities and power lines improves the ecological function and natural beauty of Tennessee Valley.





A visitor center in the historic WWII Barracks supports the wide range of visitor activities and preservation goals at Rodeo Beach.

Marin City Ridge and Gerbode Valley

Natural Zone (Majority of the Marin Headlands Extending South of Tennessee Valley)

This area would be managed to preserve the expansive undeveloped wild character of the landscape, preserve natural resources and processes, continue habitat restoration, protect endangered and sensitive species, and improve the trail system with more sustainable trails and better connections to adjacent communities. Visitor amenities could include expanded primitive and accessible camping opportunities. The National Park Service would collaborate with other agencies and the community to develop a community trailhead in Marin City.

Fort Barry and Fort Cronkhite

Diverse Opportunities Zone (Lower Elevations of Rodeo Valley along Bunker Road, Fort Barry, and Fort Cronkhite)

This zone would be managed to provide visitors with a variety of recreational, educational, and stewardship activities consistent with the protection of the nationally significant cultural resources in the area. Visitor amenities could be expanded to include improved trailheads, accessible trails, camping, picnicking, and orientation. These facilities would welcome visitors and give access to the adjacent natural areas. Fort Cronkhite would function as the visitor portal to the Marin Headlands.

This plan would build upon the nucleus of existing programs offered by the park and its partners that contribute to the concept of a "Center for the Environment." Rehabilitated structures and limited new construction would continue to be used by the park and its partners to provide visitors with an expanded menu of opportunities that are strongly linked to the park's purpose. Programs would focus on environmental education, science, history and culture, recreation, healthy lifestyle activities, and special events. A native plant nursery, staff offices, and housing for staff, interns, and volunteers of the park and its partners would be provided within this zone. A visitor contact facility combining information and food service would be developed at a site near both the beach and a transit stop, replacing the existing chapel visitor center at Fort Barry.

In 1994, the National Park Service removed a national landmark World War II cantonment to restore Crissy Field, with the understanding that the cantonment at Fort Cronkhite would be preserved and interpreted. The Fort Cronkhite cantonment is not only highly representative of the once-ubiquitous 700-Series World War II mobilization cantonments; it is considered the best-preserved example of its type in the United States. Every effort will be made to enhance the historic scene while creating diverse visitor opportunities in this zone.

Fort Barry and other historic sites and structures within this zone would continue to support programs provided by the park and its partners consistent with the concept described for Fort Cronkhite. The former motor pool site would provide for public equestrian programs and the park horse patrol, while the balloon hangar would support interim park maintenance functions. The park would incorporate essential site improvements while preserving historic resources and implementing best management practices to protect natural resources. The Fort Barry chapel visitor center could be adapted for other uses.

Natural Zone (Uplands)

This area of the Marin Headlands would be managed as part of the extensive natural landscape, with emphasis on the protection and restoration of habitat for threatened and endangered species.

Evolved Cultural Landscape Zone (Rodeo Beach and Seacoast Fortifications)

This zone would be managed for enjoyment of the beach, trails, and other outdoor recreation and educational opportunities. The landscape would be managed to preserve and interpret the significant military features and structures, such as Wolf Ridge and Batteries Townsley and Mendell, in the natural coastal setting.

Sensitive Resources Zone (Rodeo Lagoon and Rodeo Lake)

This area would be managed to preserve and restore coastal habitat for threatened and endangered species. Visitor access would be highly controlled and restricted to designated trails.

Historic Immersion Zone (Nike Missile Launch Site SF88-L)

The restored compound would continue to provide visitors with an immersion that is evocative of the military tensions during the Cold War era.

Capehart Housing Area

Park Operations Zone

A new park operational facility would be constructed within this zone south of Bunker Road. Housing lost through removal of Capehart buildings to construct this facility could be accommodated at another site, either in existing structures or through limited new construction.

Natural Zone

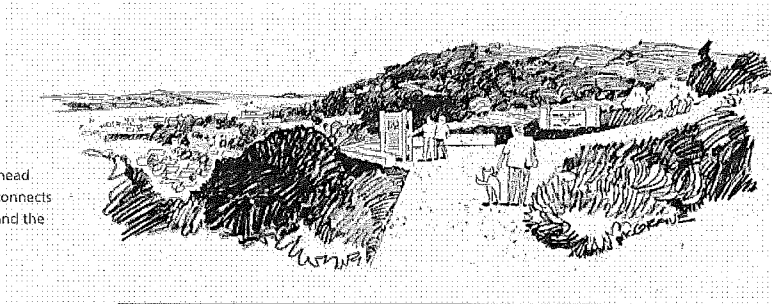
The residences on the north side of Bunker Road would be removed to provide for creek restoration and to create a more natural and scenic entrance to Rodeo Valley.

Conzelman, Bunker, and McCullough Roads (Including Battery Spencer and Hawk Hill)

Scenic Corridor Zone

Managers would highlight the fundamental coastal resources, endangered species habitat, military fortifications, and spectacular views of the Golden Gate Bridge, San Francisco Bay, and the urban skyline of San Francisco, primarily from the roads and trails. Pedestrian, bike, and motor vehicle access to overlooks and to interpretive and recreational opportunities would be provided. Some overlooks, such as Hawk Hill, would be improved with amenities including interpretive signs, restrooms, and benches.

A community trailhead
above Marin City connects
to ridgetop trails and the
Marin Headlands.



Kirby Cove

Evolved Cultural Landscape Zone

This area would be managed for beach access and camping, and would support additional uses by visitors on the new San Francisco Bay Water Trail. Rustic cabin accommodations could be developed, maintaining the setting and character of this park site. The coastal fortifications and historic forest would be preserved and interpreted.

Habitat restoration would continue outside the historic forest with removal of invasive nonnative vegetation and expansion of habitat for the endangered mission blue butterfly.

Point Bonita Lighthouse Complex

Historic Immersion Zone

The park would continue to preserve the historic structures and interpret the site's maritime and military history in partnership with the U.S. Coast Guard. The coastal environment and sensitive marine habitat would be protected.

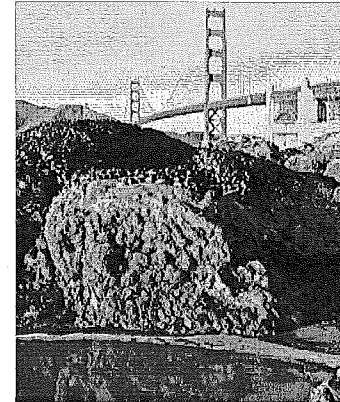
Nearshore Ocean and Bay Environment

Scenic Corridor Zone (All Nearshore Areas Except Point Bonita Cove and Bird Rock)

Park managers would work to preserve the integrity of the ocean and bay environment, while accommodating public uses including surfing, boating, and recreational fishing. Management actions would protect the marine habitat, rocks, sea caves, and other natural features of the area in coordination with the Monterey Bay and Gulf of the Farallones national marine sanctuaries. This zone would support the San Francisco Bay Water Trail where appropriate.

Sensitive Resources Zone (Extending 300 Feet Around Point Bonita Cove and Bird Rock)

The park would preserve sensitive marine resources—intertidal resources, seabirds, and marine mammals—in these two locations. Visitation would be highly restricted to protect resources that are easily disturbed. Park-approved research would be the primary activity in this zone, but would be conducted in a manner that is highly protective of sensitive resources.



Park Lands in San Francisco

Connecting People with the Parks

Overview

The park lands of San Francisco would continue to provide opportunities to experience nature; explore our heritage; and enjoy the company of family, friends, and fellow community members. Under this alternative, these areas would be managed to preserve and enhance a variety of settings and improve and expand the facilities that welcome and support visitors to the "National Park Next Door."

The visibility and identity of national park system sites would be improved in settings from military to "wild," and visitors would be introduced to Golden Gate National Recreation Area through facilities, information, and programming at popular arrival nodes and recreational destinations. The San Francisco-based Alcatraz embarkation facility would serve as a portal to Golden Gate National Recreation Area and the larger national park system.

The plan would also emphasize the importance of education, civic engagement, and healthy outdoor recreation, including offering nature experiences to city children and their families. Existing and new facilities, including a museum collection facility, would support visitor enjoyment, learning, and community-based natural and cultural resource stewardship. Recreational and stewardship opportunities would promote healthy parks and healthy communities. Similar to the engagement around Crissy Field, this plan will engage the community to revitalize coastal park areas such as Ocean Beach, Fort Funston, and Lands End in collaboration with other land managers.

The park would continue to improve multiuse trails and trailheads throughout the San Francisco park lands to make the park accessible to the broadest array of visitors. Sites would be connected to each other and to communities by the trail system and the city's transit and multimodal access systems.

Upper Fort Mason

Evolved Cultural Landscape Zone (Eastern Portion of the Site)

The historic district would become a portal to Golden Gate National Recreation Area, using historic structures to welcome visitors in a setting that would remain a peaceful contrast to the more bustling northern waterfront of Fisherman's Wharf and Lower Fort Mason. The park would preserve and rehabilitate select historic structures for new uses that provide orientation, information, food service, special events, and other services for visitors. With improved visibility, signs, and additional activities, this site would provide visitors with better access and understanding of the opportunities available throughout the park.

Historic residences would continue in residential use where compatible with preservation goals. Other nonresidential historic structures would be preserved for uses such as a hostel and other overnight accommodations, park headquarters, partner offices, and other programs that support the park mission.

The two neighboring national park units, Golden Gate National Recreation Area and San Francisco Maritime National Historical Park, would collaborate on unified visitor welcoming and orientation, exploring the potential to share facilities. Consistent NPS site identification and directional signs would be placed along the popular Golden Gate Promenade / San Francisco Bay Trail and at transit nodes.

An expanded stewardship program would connect the park with San Francisco through youth programs offered by the park and its partners.

The historic district's batteries and landscape would be restored and rehabilitated, including the overgrown gardens on the east and northeast slopes. The community garden would be retained in its current location. Historic Pier 4, at the foot of Van Ness Avenue, would be stabilized.

This scenario anticipates improved access to the park by the development of a water shuttle at Lower Fort Mason and improved walking paths and planned San Francisco Municipal Transportation Agency (SFMTA) projects, including both the extension of the F-Line Streetcar to Lower Fort Mason and development of the bus rapid transit on Van Ness Avenue. Visitor circulation and wayfinding improvements would be implemented in response to these new adjacent bus, transit and ferry connections. These concepts would require close collaboration with San Francisco Maritime National Historical Park and the City of San Francisco to improve the experience of arriving at Fort Mason through Aquatic Park and Gashouse Cove at Laguna Street and Marina Boulevard.

Diverse Opportunities Zone ("Great Meadow")

The "Great Meadow" would continue to support a variety of uses and special events with modest improvements to enhance the landscape, enhance the safety of pedestrians and bicyclists on the paths, and provide formal opportunities for picnicking.

Park Operations Zone

Park operations could remain in their current locations. Adjacent structures would continue to house a conservation corps program. If the program relocates, the site and structures would serve park operational needs.

Sensitive Resource Zone (Shoreline at Black Point, Including a 100-Foot Nearshore Buffer to Protect Intertidal Resources)

This area would be managed to protect the rare remaining natural rocky shoreline in San Francisco inside the Golden Gate. An overlook would be developed in the adjacent zone to allow visitors to experience this small site.

China Beach

Diverse Opportunities Zone

Park managers would improve visitor facilities and access to support current uses. The park would also retain space for park operational needs, including a support office for lifeguards.

Lands End

Evolved Cultural Landscape Zone

Park managers would continue to enhance the landscape, integrating natural habitat restoration with cultural landscape preservation, and improving the trail system. This would include the California Coastal Trail and the secondary trails that access the shoreline and would enhance scenic viewpoints and opportunities for bird watching. The area would continue to be managed for the preservation of dark night skies. Trail connections and directional signage to the community and adjacent park lands would also be improved.

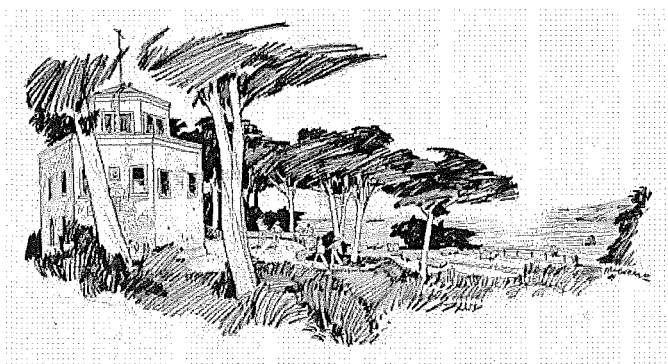
Fort Miley

Evolved Cultural Landscape Zone (West Fort Miley)

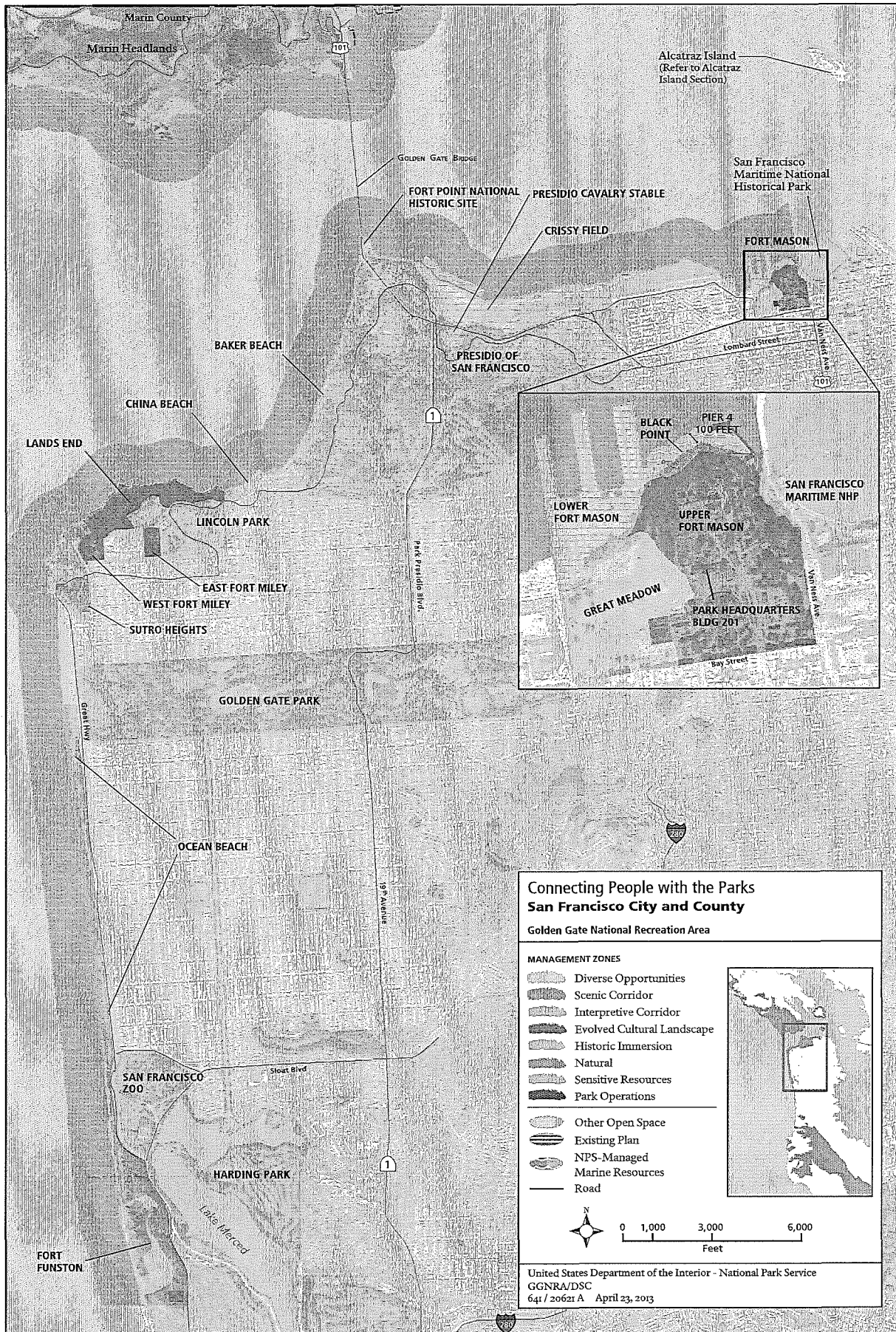
The historic structures and cultural landscape would be preserved and enhanced. The Marine Exchange Lookout Station (Octagon House) and its setting would be rehabilitated and its history interpreted. It would provide for park operations, residential, or public uses. Site improvements would focus on enhancing the fort's appearance and providing better connections to the surrounding community, nearby Lands End site, and the Veterans Administration hospital campus. Improved picnicking and group camping facilities would be provided in an appropriate location, as would opportunities for outdoor learning and leadership programs. The area would continue to be managed for preservation of dark night skies.

Park Operations Zone (East Fort Miley)

The historic batteries and ordinance storehouse would be preserved and would continue to support park maintenance and public safety satellite operations with potential expansion of volunteer stewardship based from this site. Group camping facilities could also be developed. Other site improvements would focus on interpreting the history of Fort Miley, improving the picnic area, and



The coastal setting of the historic Marine Exchange Lookout Station at West Fort Miley is restored.



enhancing trail connections for better visitor access linking to the medical center, the community and Lands End. Safe and more direct service vehicle access could be developed.

In Both the Evolved Cultural Landscape Zone and the Park Operations Zone

Continued coordination with the San Francisco Veterans Affairs regarding their campus development and management will be important to ensure compatibility with park uses and historic preservation.

Ocean Beach

In Both the Diverse Opportunities Zone and the Natural Zone

The park would participate in multiagency efforts to knit the unique assets and experiences of the Ocean Beach corridor into a seamless and welcoming public landscape, planning for environmental conservation, sustainable infrastructure, and long-term stewardship. The park would continue to participate in multiagency planning and implementation efforts following the 2012 Ocean Beach Master Plan, and other more detailed planning and implementation processes that would follow.

The National Park Service would continue to work with the City of San Francisco, California Coastal Commission, and the U.S. Army Corps of Engineers to address coastal erosion, restore natural processes, and maximize protection of the beach for its natural and recreational values. The National Park Service could relocate park facilities from vulnerable locations and would work with municipalities to identify the most compatible and sustainable management of stormwater and wastewater facilities within their easement rights.

The California Coastal Trail and other connections would be improved to link Ocean Beach to Lands End, Fort Funston, city neighborhoods, and other park lands including Golden Gate Park and Lake Merced.

Diverse Opportunities Zone (Along the O'Shaughnessy Seawall)

Park managers would continue to provide a diversity of recreational beach use and preserve the natural setting and resource values, including shorebird habitat. The vital community stewardship activities that are part of the successful management of the beach would be promoted.

The park would preserve the historic O'Shaughnessy seawall and collaborate with the City of San Francisco to enhance the Ocean Beach corridor with improved amenities that support enjoyment of the beach, including the promenade, parking areas, and restrooms.

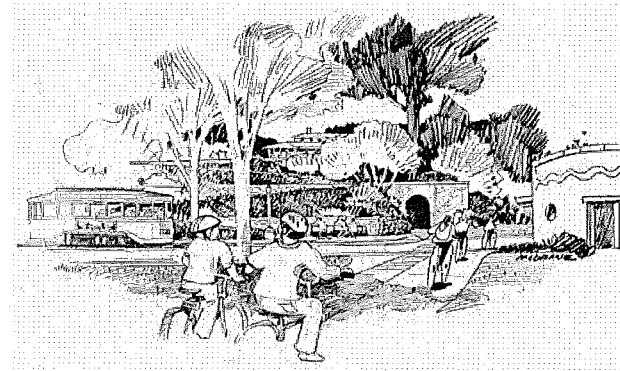
Natural Zone (South of the O'Shaughnessy Seawall)

The area would be managed to protect shorebirds and threatened species and allow natural coastal and marine processes to occur, while providing for a variety of compatible recreational activities. Public safety and stewardship activities would be continued.

Fort Funston

Diverse Opportunities Zone (Central Area and Southern Beach)

This site would continue to support current recreational activities, including dog walking and the unique opportunity for hang gliding in the park, while making landscape and trail improvements and protecting and restoring natural habitat. New visitor facilities would be provided near the parking lot. These could include restrooms, group picnicking facilities, a visitor contact facility combining food service with park information, and other support structures. Battery Davis, the historic seacoast fortification, would be preserved and interpreted and its earthworks fenced and protected.



New garden walkways and the historic streetcar connect visitors to Fort Mason and Aquatic Park.

Natural Zone (Corridors Along the Perimeter and Northern Beach)

Fort Funston's islands of native habitat would be extended to form a continuous habitat corridor that supports recovery of native dune habitat including endangered San Francisco *Lessingia* plants. The northern stretch of beach would be managed to protect shorebirds, coastal bluffs, and bank swallows and to allow natural coastal and marine processes to occur to the extent feasible, while providing for a variety of compatible recreational activities.

Park Operations Zone (Southeast Corner)

Operational facilities could be expanded to meet park needs, including public safety offices, nursery, stewardship center, satellite maintenance facilities, and staff or volunteer housing.

The existing environmental education center could remain in this zone or be relocated to another site better served by public transportation with appropriate facilities and outdoor settings.

In Both the Diverse Opportunities Zone and the Natural Zone

Trails within Fort Funston and trails connecting to adjacent park lands, such as the California Coastal Trail, would be improved.

In All Zones

The National Park Service would work with municipalities to identify the most compatible and sustainable management of their stormwater and wastewater facilities within their easement rights. Also, the National Park Service would cooperate with Caltrans and the City of San Francisco to encourage safety improvements along Highway 35 and protect high-quality visitor experiences for visitors to both Fort Funston and Lake Merced along this corridor.

Nearshore Ocean and Bay Environment

Scenic Corridor Zone

The park would preserve the ocean and bay environment and accommodate public uses including surfing, boating, and recreational fishing. Park managers would protect the marine habitat, geologic resources and processes, and other natural features of the area.

Sensitive Resource Zone

The park would continue to manage the existing Crissy Wildlife Protection Area for the protection of waterbirds and other wildlife.



Park Lands in San Mateo County

Connecting People with the Parks

Overview

Park lands and ocean environments in San Mateo County would be managed as part of a vast network of protected lands and waters, some recognized as part of the UNESCO Golden Gate Biosphere Reserve. This network includes San Francisco Public Utilities Commission Peninsula Watershed lands, California State Parks, the Monterey Bay National Marine Sanctuary, county parks, and other land held by regional land trusts. Park managers would emphasize connectivity, preservation, and restoration of the area's vital ecosystems through collaborative partnerships with other land management agencies.

In the spirit of the "Parks to People" movement that created Golden Gate National Recreation Area four decades ago, this plan would focus on the importance of improving access and engaging the community in these newest park lands. Given the significant addition of park land in the county in recent years, a series of actions would be needed to enhance visitor access, enjoyment, appreciation, and stewardship.

Key efforts would include improving the visibility and identity of NPS sites. Park trails would be improved to create a sustainable system that provides opportunities to enjoy park sites, connects with local communities, and contributes to an exceptional regional trail network. Equestrian facilities would continue to have an important role in recreation and stewardship. A comprehensive trail plan would be prepared to achieve these goals.

Park managers would work with county transit providers to improve transit connections to local trailheads and east-west transit between bayside communities and the ocean beaches. Collaboration with the community and Caltrans would focus on providing safe access to park sites along State Route 1.

The addition of signs and trailhead parking would help visitors find their way to various park sites and help them gain an understanding of the park's diverse natural and cultural resources. Equestrian needs would be incorporated in trail and trailhead design.

Equally important would be providing facilities to welcome visitors to the park. This plan would promote visitor information and orientation centers in Pacifica and in the coastal community south of Devil's Slide. Park improvements would be consistent with preservation of community character.

These facilities could be shared with San Mateo County Department of Parks, California State Parks, Monterey Bay National Marine Sanctuary, local governments, and other organizations. The National Park Service would explore community trailheads and partnerships with the San Mateo County Historical Association at the Sanchez Adobe.

South of Fort Funston to South of Mussel Rock

Natural Zone

Park managers would work with other land managers to preserve and enhance the natural, cultural, and scenic values of the area; allow for natural coastal geologic processes to continue; and provide modest visitor access facilities (trails, trailheads) to beaches, scenic overlooks, and along the California Coastal Trail, where feasible.

The beach, dunes, and cliffs extending from San Francisco's Ocean Beach south to Mussel Rock (a stretch of almost 5 miles) would be managed to protect shorebird habitat, allow natural shoreline processes to continue unimpeded, and provide improved or new trails for visitors to enjoy and view nature. Park staff would work with neighboring communities to mitigate concentrated urban runoff and landslide threat.

Milagra Ridge (Including Lower Milagra Ridge [Connemara]) Conservation Easement

Natural Zone

The area would be managed to preserve its wild character and protect habitat for endangered species. Disturbed areas would be restored. Coordinating with other land managers, the park would also make trail improvements that could include connections to Oceana Boulevard, the Pacific coast, Skyline Boulevard, and Sweeney Ridge. Historic structures would be preserved.

Scenic Corridor Zone (Center of Ridge)

Additional amenities would be developed to support visitors and stewardship volunteers. These could include accessibility improvements, trailhead parking, restrooms, and picnic facilities.

Sheldance Nursery Area

Diverse Opportunities Zone and Park Operations Zone

The site would transition from its primary use as a commercial nursery to an area that provides a variety of visitor services that could include enhanced trailhead parking serving Sweeney Ridge and Mori Point, restrooms, park orientation and information, and a community stewardship / education center. The park would encourage improved east-west connectivity between Sweeney Ridge and Mori Point as part of planned improvements to State Route 1. Safe access from State Route 1 and the trail connection to Mori Point would be improved.

A portion of this park site would be dedicated to park operational needs, possibly including a satellite facility for maintenance and public safety, native plant nursery, and ranger workforce or volunteer housing.

Sweeney Ridge (Including Cattle Hill, Picardo Ranch, and Sweeney Ridge Gateway Conservation Easement)

Natural Zone (Majority of the Area)

The area would be managed to protect endangered species and the large contiguous natural landscape extending into the San Francisco Public Utilities Commission Peninsula Watershed. Visitors could experience the area through stewardship activities, improved trails, and primitive camping. Improved trailhead facilities would enhance the connection to the community at Fessler Avenue. Connections to the regional trail network and the surrounding public lands (San Francisco Public Utilities Commission lands, San Pedro Valley County Park, McNee Ranch, and Rancho Corral de Tierra) would be developed in coordination with other land managers.

Management of the conservation easement over the 7.2-acre parcel adjacent to the Sweeney Ridge Sneath Lane Trailhead would be consistent with the 2007 easement and the restrictions of the 2005 U.S. Fish and Wildlife Service (USFWS) biological opinion for the PG&E Jefferson-Martin Project. The emphasis of management will be to preserve upland habitat for the California red-legged frog and San Francisco garter snake.

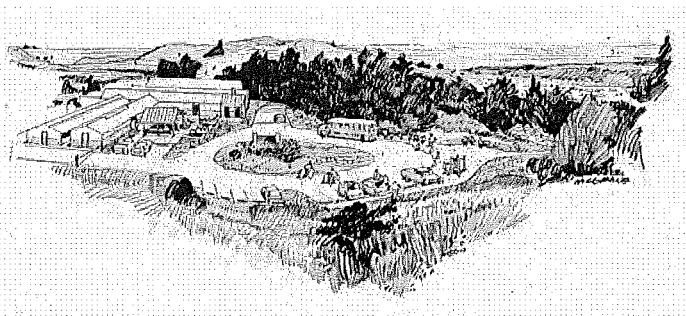
Scenic Corridor Zone (Sneath Lane and Part of Sweeney Ridge)

Trail amenities would be developed and connections would be enhanced to the Bay Area Ridge Trail and the San Andreas Trail in San Francisco Public Utilities Commission Peninsula Watershed. The San Francisco Bay Discovery Site National Historic Landmark would be preserved and interpreted. The park would continue to permit vehicular access to the discovery site for visitors with disabilities and to accommodate limited special events. A hikers' hut could be developed as part of a system of huts proposed for the Bay Area Ridge Trail. Partnership-based programs would be pursued in preparation of the upcoming 250th anniversary of the discovery of San Francisco. Actions for the Nike Missile Launch Site might include removal of buildings or retaining the shells of buildings. Under either preservation treatment, the site's history could be interpreted.

Diverse Opportunities Zone (Developed Portion of Picardo Ranch)

If acquired, the existing facilities could be adapted or replaced with new facilities to support visitor activities, potentially including continued equestrian use, environmental education, trailhead improvements, and park operations. Management would include strong protection for the creek corridor and other natural habitats.

The trailhead to Sweeney Ridge is enhanced as the site transitions from commercial to park purposes.



Mori Point

Natural Zone

The land would be managed for ongoing restoration of natural habitats and to protect threatened and endangered species while improving the trail system for public enjoyment of the site and its exceptional views and landscapes. Access to Mori Point would be enhanced with modest trailhead and parking improvements.

Trail connections to the community, Sweeney Ridge and the adjacent public lands, and the California Coastal Trail would be improved in partnership with other land managers. Collaboration with adjacent land managers would also contribute to expanded efforts to preserve listed species and their habitats, improving habitat connectivity across management boundaries.

Point San Pedro

Natural Zone

These lands, if acquired, would be managed to maintain natural features and scenic beauty and to continue with the habitat restoration and access improvements initiated by the community and other agencies. Trailheads and trails would be developed and enhanced to improve accessible connections to the California Coastal Trail, Devil's Slide, and adjacent lands. Public access would be managed to protect nesting seabirds and historic resources. Collaboration with adjacent land managers would be essential.

Rancho Corral de Tierra

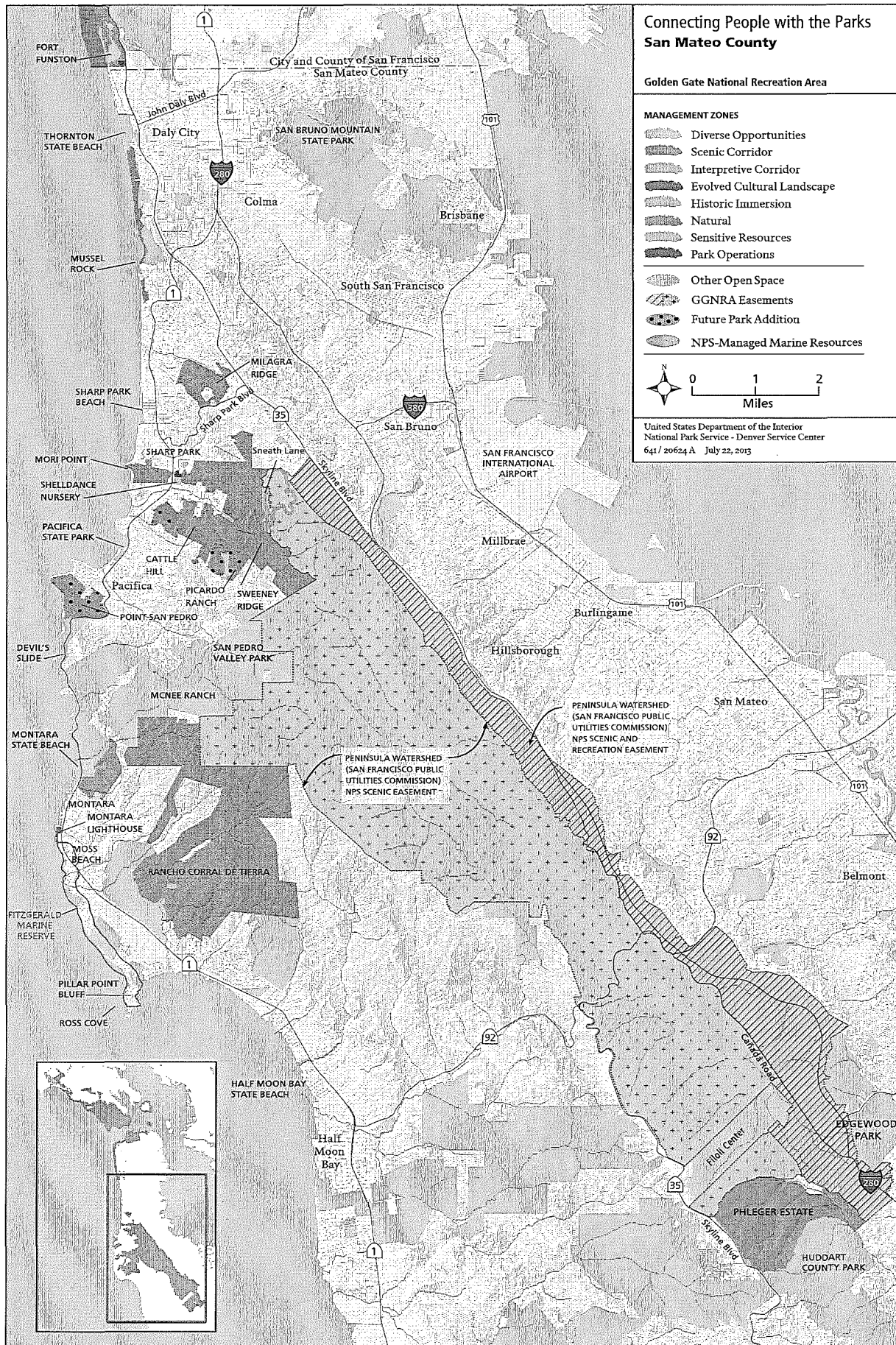
Natural Zone (Majority of the Area)

The upland areas and land outside the existing equestrian centers would be managed to preserve the wild, open character of the landscape and offer trail-based recreation that is light on the land, including walking, hiking, bicycling, and horseback riding. Natural habitats and processes in the zone, which includes four creek corridors, would be restored to the greatest extent possible with the help of community stewards.

Visitors would enjoy the scenic coastal environment through an enhanced and sustainable system of trails. The trail network would connect local communities to the park and link the ridges of Montara Mountain to the Pacific Ocean. The National Park Service would work with the San Francisco Public Utilities Commission to complete a trail connection to Sweeney Ridge through the Peninsula Watershed's northwest corner along Whiting Ridge. Unnecessary management roads could be converted to trails or removed. Exploration of the park could be facilitated by scenic overlooks, primitive camping sites, and possibly a hikers' hut in a remote setting.

Diverse Opportunities Zone

Modest improvements would be created in this zone consisting of trailheads and other visitor facilities that provide for the enjoyment of this new area. This area would be considered a southern portal to the Golden Gate National Recreation Area and other public open space. Detailed future planning would determine the mix of uses that would share this zone. Equestrian uses would be retained at Rancho Corral de Tierra, with the exact location, type, and scale of facility improvements determined in future planning efforts. Park managers would continue to work with equestrian operators to enhance the best management practices employed to protect the environment and expand programs that welcome and benefit the public. New facilities in this zone could include trails, trailheads, a community stewardship/educational center, a group picnic area, a rustic campsite,



Visitors are welcomed to Rancho Corral de Tierra at a new trailhead.



and a horse camp. Significant constraints on availability of water will influence development and operations of facilities at this site. Any new visitor facility would be sited to preserve natural and cultural resources and where compatible with adjacent uses such as agriculture.

In addition, safe trailheads would be developed near State Route 1 to support exploration of this large, diverse landscape and the extensive adjacent public lands. The multiuse trails and trailheads would be compatible with adjacent residential uses.

Habitat restoration and community stewardship activities would have a strong presence in both zones. An area for native plant production would be established to support restoration projects in the park. The National Park Service would partner with surrounding land managers and the Fitzgerald Marine Reserve, one of the richest intertidal areas on the California coast, to improve habitat connectivity and protect sensitive habitats, protect water quality, restore the creek corridors and reconnect them to the ocean, and reestablish anadromous fish passage where possible.

The National Park Service would connect people to the agricultural history of Rancho Corral de Tierra through interpretation of its cultural landscape and adjacent working farms.

Montara Lighthouse

Evolved Cultural Landscape Zone

The historic lighthouse structures and other associated resources, if acquired, would be preserved and interpreted. Management would enhance the current hostel and day-use programming. Trail connections from the hostel up and down the coast would better integrate this site with other park lands and open space.

The park would seek an opportunity to establish a multiagency visitor information and orientation facility in the vicinity. Safe access for vehicles, bicyclists, and pedestrians would be pursued in cooperation with Caltrans and San Mateo County and addressed prior to any substantial change in visitor use.

Phleger Estate

Natural Zone

The area would be managed to provide trail-based recreation in a natural and contemplative setting that complements the more developed recreation facilities at adjacent Huddart County Park. The redwood forest ecosystem, including West Union Creek and threatened and endangered species, would be protected and restored. The history of logging on the estate and its role in the settlement of San Mateo County would be interpreted. Trail connections to adjacent lands and the regional trail system would be pursued in collaboration with San Mateo County and San Francisco Public Utilities Commission. These connections would include the Bay Area Ridge Trail, potential access from trailheads on Cañada Road and Skyline Boulevard, and a multiuse trail connection between Cañada Road and Skyline Boulevard north of the Phleger Estate. Community stewardship of the site could contribute to trail and habitat improvements. The National Park Service would explore community trailheads and partnerships with the San Mateo County Historical Association's Woodside Store historic site.

San Francisco Public Utilities Commission Peninsula Watershed Easements (Not Zoned)

Note: The approximately 23,000-acre San Francisco Peninsula Watershed is owned by the City and County of San Francisco and managed by the San Francisco Public Utilities Commission for watershed protection as a water supply resource with limited public access. This area is included within the Golden Gate National Recreation Area authorized boundary, and is adjacent to NPS-managed lands at the Phleger Estate, Sweeney Ridge, and Rancho Corral de Tierra.

Golden Gate National Recreation Area administers two easements encompassing the entire watershed property—a scenic easement over approximately 19,000 acres and a scenic and recreation easement over approximately 4,000 acres. The provisions of the easements include preservation of the land in its present natural state, allowing certain recreational uses, and requiring approval of the park superintendent for certain actions (see "Special Mandates" section and the appendices of the full General Management Plan / Environmental Impact Statement [FGMP / EIS]).

Because NPS management responsibility over the watershed is limited to administration of the easements, this area is not included in management zoning for the park. Actions described below would be encouraged or promoted by the National Park Service for these two easement areas (see appendixes I and J of the FGMP / EIS). Some of these actions are already identified in the *Peninsula Watershed Management Plan* (SFPUC 2001)—the San Francisco Public Utilities Commission's current land use plan for this area. Other actions are suggested for future consideration. Future actions would be subject to the approval of the San Francisco Public Utilities Commission and consistency with the easements. Actions could be implemented either solely by the commission or in cooperation with Golden Gate National Recreation Area and San Mateo County.

Both Easement Areas

The National Park Service would continue to coordinate with the San Francisco Public Utilities Commission to administer the easements consistent with the easement goals and restrictions. Ongoing and regular communication with the commission to review activities and proposed projects would continue to be a key NPS responsibility. Park managers would continue to cooperate with the San Francisco Public Utilities Commission for preservation of the natural, cultural, scenic, and recreational values of the watershed with improved public access on trails.

Scenic Easement Area (Majority of the area—approximately 19,000 acres)

Within this area, completion of the Bay Area Ridge Trail connection from the Phleger Estate to Highway 92 would be encouraged. A new trail connection between the Bay Area Ridge Trail and the California Coastal Trail using an existing management road over Whiting Ridge would also be promoted. The Whiting Ridge alignment would connect Sweeney Ridge with McNee Ranch and Rancho Corral de Tierra. Park managers would also promote preservation of the values that resulted in designating this area as the core of the UNESCO Golden Gate Biosphere Reserve.

Scenic and Recreation Easement Area (Eastern area closest to Highway 280—approximately 4,000 acres)

Implementation of trail improvements proposed in the 2001 Peninsula Watershed Management Plan would be promoted. These include completion of the north-south trail through the watershed in areas of low sensitivity and a new trail connecting the existing San Andreas multiuse trail to Sweeney Ridge via Sneath Lane. Improving trail access to the Phleger Estate from a new trailhead on Cañada Road and a new multiuse trail connection through the Peninsula Watershed lands between Cañada Road and Skyline Boulevard north of the Phleger Estate would also be encouraged. Preservation of scenic views along the trails, Cañada Road, Skyline Boulevard, Interstate 280, and its vista points would be promoted in cooperation with the San Francisco Public Utilities Commission and Caltrans. Additional coordination with the Juan Bautista De Anza National Historic Trail could also be provided.

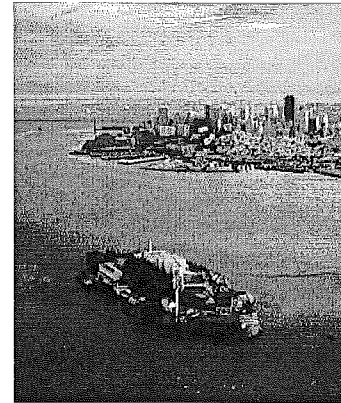
The National Park Service would offer to cooperate with the San Francisco Public Utilities Commission in creating a watershed visitor education center near the Pulgas Water Temple on Cañada Road, as described in the 2001 *Peninsula Watershed Management Plan*.

Nearshore Ocean Environment

Management of nearshore areas could be extended to cover new segments of the San Mateo County coast as described in the "Boundary Adjustments" section of the FGMP/EIS.

Fitzgerald Marine Reserve (Not Zoned)

In areas where the park boundary coincides with the Fitzgerald Marine Reserve, the two organizations would continue to cooperate in implementation of the provisions of the California State Marine Life Protection Act.



Alcatraz Island

Alcatraz Island

Focusing On National Treasures

Overview

For more than 150 years, Alcatraz Island has been reworked and altered by human activity. This alternative would immerse visitors extensively in all of Alcatraz Island's historic periods, including Civil War military fortifications and prison, a federal penitentiary, and American Indian occupation. Alcatraz Island's history would be interpreted, first and foremost with tangible and accessible historic resources, including the structures, landscape, archaeological sites, and museum collection. These resources contribute to the island's national historic landmark status and its recognition as an international icon.

Most visits would begin at an enhanced ferry embarkation facility in San Francisco. On the way to the island, the ferry would pass a line of replica warning buoys. The immersive experience would continue at the island's arrival dock, with greater access to restored portions of Building 64, the historic barracks. On the island, visitors would ascend to the main prison on the summit through a landscape of preserved historic structures and features. While the primary visitor experience would focus on the federal penitentiary, visitors also would be exposed to the other periods of history, literally and programmatically.

Implementation of this plan would require excavations, extensive stabilization, rehabilitation, and/or restoration of historic buildings, small-scale landscape features, and archeological sites, as well as creative interpretive and educational programs and visitor services. Park managers would create additional opportunities for cultural resource stewardship programs.

Visitors would have opportunities to learn about the natural history of San Francisco Bay. The colonial waterbird habitat that has grown in regional importance would be protected, enhanced, and interpreted. Visitors could also explore the island perimeter, managed to protect sensitive bird populations while providing opportunities to observe them or participate in stewardship activities. The large population of gulls would be managed to reduce conflicts in primary visitor use areas like the Parade Ground. In addition, a comprehensive user capacity strategy would help the park to monitor and adaptively manage crowding, congestion, and impacts on resources.

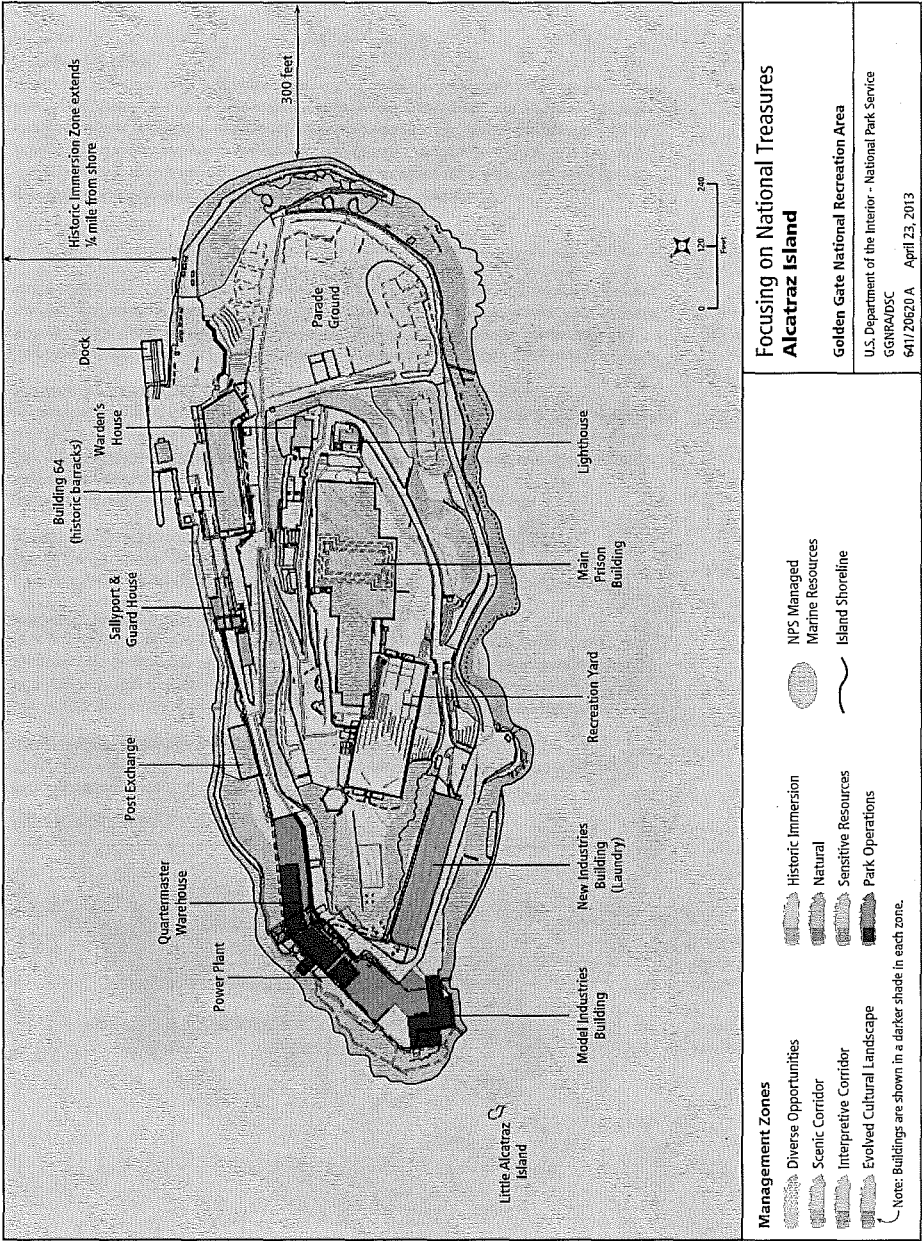
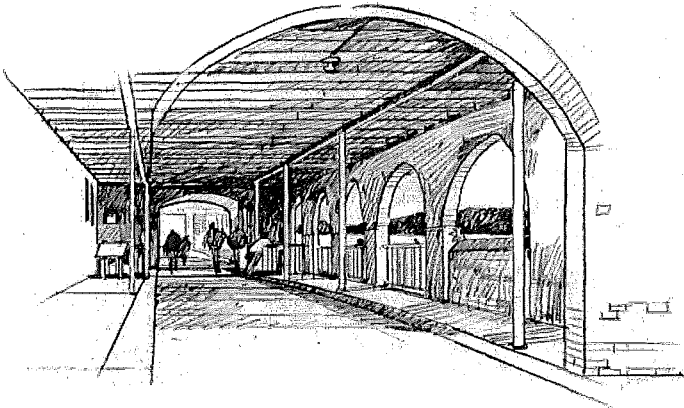
Ferry Embarkation

The visitor's immersion in Alcatraz Island history would begin from an embarkation site in San Francisco. The primary embarkation site would remain on San Francisco's northern waterfront where visitor services, including education about Alcatraz and orientation to Golden Gate National Recreation Area, could be enhanced. Additional ferry connections could be provided to other park sites as part of the San Francisco facility's role as a portal to the park. Ticketing would continue to be through a reservation system, and ferries would operate daily on a year-round schedule. The length of the ferry trip between the mainland and Alcatraz Island would remain approximately 10-15 minutes.

Arrival Area (Including the Dock, Building 64 [Historic Barracks], and the Sallyport)

Historic Immersion Zone
Here, the park would welcome, orient, and begin to immerse visitors in the island's prison landscape, creating an atmosphere evocative of its history. To better reveal the early military prison period, the guardhouse could be restored by removing the later boathouse addition. Selected areas of Building 64 would be restored to tell the story of its history and use. Period restoration in the building would include the post office, canteen, and a prison-era guard apartment to extend the immersive experience. Other parts of Building 64 would be rehabilitated for visitor services and administrative functions and could include modest dorm-like overnight accommodations for participants in education, conservation, and stewardship programs. The upper floors would be stabilized to preserve the structure's integrity.

Selectively removing later building additions could help visitors understand the character and central role of the Guardhouse Sallyport, from when Alcatraz was a military prison.



Main Prison Area (Including the Citadel, Main Cellblock, Hospital Wing, Administration Wing, Recreation Yard, New Industries Building, Post Exchange, and Parade Ground)

Historic Immersion Zone

The many historic resources of the Main Prison Building would provide visitors with the opportunity to explore the federal penitentiary's history. Visitors would also have access to the wide range of historic structures and features in historically accurate conditions that tell stories about the different layers of island history. Park managers would look for opportunities to expose visitors to the tangible resources (including artifacts in the park's museum collection) of the federal penitentiary and military eras.

Treatments ranging from upgrades to exhibits and furnishings to more complete restoration would continue with the goal of increasing access and interpretation of the structure's history.

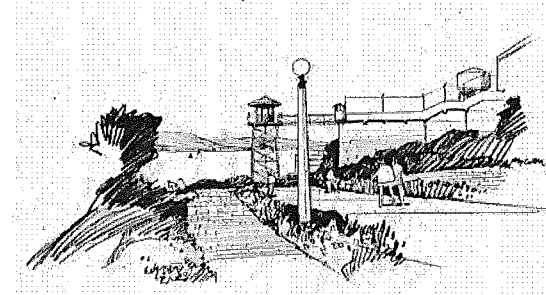
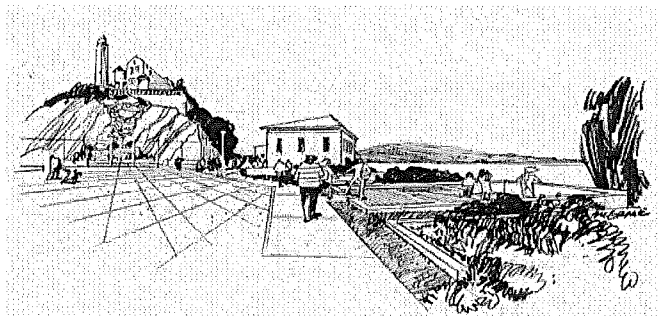
The park would also manage the adjacent areas, such as the main road, Warden's House, and the Parade Ground, to reinforce the sense of history as visitors move around the island. The Parade Ground would be rehabilitated, along with aspects of its buried archaeological sites, to support year-round visitor exploration of this area in coordination with adaptive management of western gulls. The rehabilitation could incorporate measures to support natural systems with preservation of cultural resources. With potential involvement of partners, the Post Exchange would be stabilized to provide visitors with opportunities to explore and understand the building's layered history. Additional preservation could be possible with the involvement of partners to make a more complete visitor experience and interpret the building's history.

Lighthouse

Historic Immersion Zone

The lighthouse and surrounding area would be preserved to give visitors opportunities to learn about the maritime history of Alcatraz Island and its strategic location in the bay. Access and interpretation would be enhanced.

Controlling gulls and repairing the foundations of buildings razed after the American Indian occupation could enrich visitor understanding of Alcatraz's Parade Ground.



Partial restoration of guard towers and fences, along with maintaining vegetative buffers, could balance historic preservation and waterbird habitat goals on Alcatraz.

North End of Alcatraz Island

Park Operations Zone

The Quartermaster Warehouse would be rehabilitated and used as an operational center for maintenance, public safety, and a preservation stewardship workshop.

The Power Plant would be stabilized to house green, sustainable infrastructure technologies. Where appropriate, visitor access would be provided to showcase the technologies and interpret the history of energy use on the island. The adjacent yard would support island operational needs. Access to the yard would employ measures to protect nearby seabird habitat. Visitor access to this zone would be limited.

Although this area is currently identified as the primary park operations area, the National Park Service would continue to evaluate other portions of the island that may be advantageous for operational uses such as administrative space, maintenance, and auxiliary functions.

Evolved Cultural Landscape Zone (Including Model Industries Building and New Industries Building)

The Model Industries Building and courtyard would be stabilized to the extent feasible, with only the ground floor used for park operations. Measures would be taken inside and outside the building to protect nearby sensitive natural resources. The adjacent cliffs would be closed to park operations and general visitation to protect the nearby sensitive habitat of nesting waterbirds.

The New Industries Building (Laundry) would be rehabilitated as a multipurpose facility. It would include flexible space that could accommodate interpretation, special events, classrooms, and meetings, and would include restrooms and a service kitchen to support these uses. The perimeter trail would connect through the building and provide bird-viewing opportunities from its interior.

Island Perimeter

Evolved Cultural Landscape Zone (Majority of the Island Perimeter)

The perimeter of the island, including the coastal cliffs, would be managed to stabilize significant historic resources, protect colonial nesting birds and intertidal habitat, and interpret the island's changing cultural and natural conditions. Opening a perimeter trail, including segments of the historic sentry walk, would provide visitors with enhanced access to much of the island. Sensitive design and seasonal closure of the trail, which could include the Agave Trail, would protect nesting bird habitat.

Nearshore Bay Environment

Sensitive Resources Zone (Extending 300 Feet Around Most of Alcatraz Island)

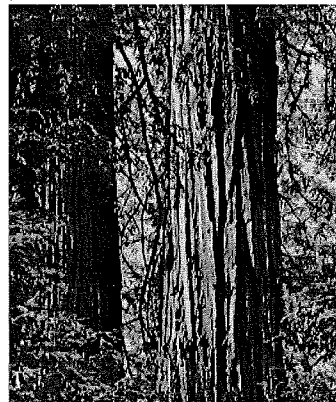
This zone would be managed as a marine protected area to preserve coastal resources, including Little Alcatraz Island, submerged resources, and seabird colonies using the island's cliffs. The area would be demarcated by buoys and closed to boats. A formal rule-making process would consider both seasonal and year-round closures.

Historic Immersion Zone (Extending from the Sensitive Resources Zone Out to ¼ mile from the Island's Shore)

The National Park Service would manage this area to accommodate service to the island. Park managers would mark and interpret the historic no-trespass zone that was in place during previous periods. Only approved vessels, like the visitor ferry, would be allowed to use the island's dock.

Sustainability

The National Park Service would continue to develop and implement sustainable approaches to meet the island's energy, water, and wastewater needs. Actions that are being considered include replacing diesel generators with renewable (e.g., photovoltaic panels) and grid-tied energy sources. These infrastructure technologies would be interpreted where possible.



Muir Woods
National Monument

Muir Woods National Monument

Focusing On National Treasures

Overview

Muir Woods National Monument is a window into the complex world of nature and conservation. This alternative would present the monument as a contemplative setting where visitors discover the primeval redwood forest and the monument's place in the early U.S. conservation movement—within minutes of San Francisco.

The system of trails would continue to lead visitors into the forest to feel, see, and learn, in different ways, about the essential qualities of the forest. These include its giant trees, the ecology of Redwood Creek, and William Kent's generous donation of the forest to the American public. Rather than continue to concentrate visitation along a main trail, visitors would be encouraged to take different thematic interpretive trails, some new and some existing, to experience different parts of the park. Other trails would be enhanced to better link the monument with the surrounding Mount Tamalpais State Park.

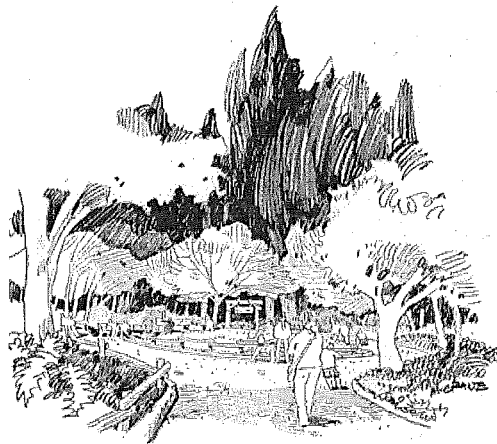
Some existing facilities and use areas, such as the entrance area and parking lots, would be modified or relocated to reduce their impacts on the ecosystem and improve the park experience.

Shuttle service from off-site locations would be expanded and be an important first point for orientation and a key to providing sustainable access to the monument. Visitors would continue to be drawn to the monument to see the trees, but they would leave with a richer understanding of this precious ecosystem and how the saving of these few acres helped spark conservation across the United States. They would be motivated to return and learn more of the story. A comprehensive user capacity strategy would help the park to monitor and adaptively manage crowding, user conflicts, and impacts on resources.

Building on the interagency *Redwood Creek Watershed: Vision for the Future* (2003), and a cooperative management agreement with California State Parks, the National Park Service would continue to collaborate with the public and other land managers to address watershed restoration, stewardship, and recreation.

The National Park Service's approach to managing visitors to Muir Woods is clarified in the Record of Decision.

A meadow-like pedestrian
entrance to the monument
is created by reorganizing
vehicular circulation and
support facilities.



Arrival

Off-site

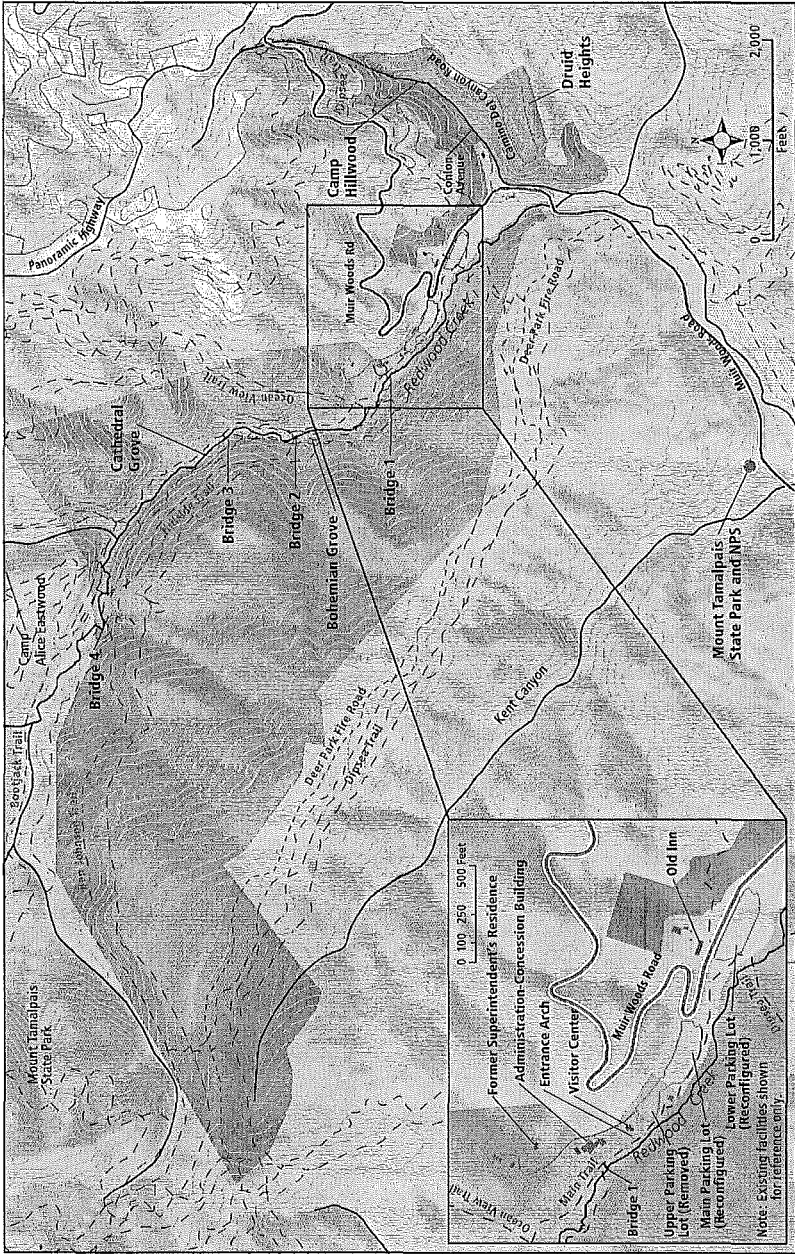
To enhance the visitor experience and address congestion problems, permanent shuttle service to Muir Woods National Monument would be provided during peak periods throughout the year. The existing transit hub in the vicinity of State Route 1 and Highway 101 could continue to serve as a shuttle facility. The National Park Service would collaborate with partners including Marin County, California State Parks, and Caltrans to provide shuttle and other necessary visitor services. This could include phased improvements to parking, sheltered waiting areas, restrooms, orientation to the monument and other regional park destinations, and improved connections to regional ferry services.

Diverse Opportunities Zone

The monument's existing entry area would be redesigned to enhance the visitor's arrival experience, protect resources, and improve safety. Parking at the monument would be reduced, reconfigured, and relocated using sustainable design practices to better protect Redwood Creek and other sensitive resources. Removal of parking would primarily be along the shoulder of Muir Woods Road. Parking supply would continue to meet demand during off-peak periods. Pedestrian access would be improved to offer visitors a more natural experience transitioning into the redwood forest separated from roads and parking.

A modest facility would be provided to receive visitors arriving by different modes of transportation. The services provided could include shuttle drop-off, sheltered waiting areas, orientation, restrooms, food service, and a bookstore. The existing separate structures for fee collection, a bookstore, and restrooms could be replaced as part of the new facility. The goal of the design process would be to accommodate visitor needs while minimizing the overall footprint of development in the park.

Future use or removal of the Old Inn would be determined through more detailed site planning that would consider its utility for visitor services or operational needs in the



Focusing on National Treasures
Muir Woods National Monument

U.S. Department of the Interior - National Park Service
GCMRA/DSC 11/2/2012 A April 23, 2013

Management Zones

- Diverse Opportunities
- Scenic Corridor
- Interpretive Corridor

Sensitive Resources

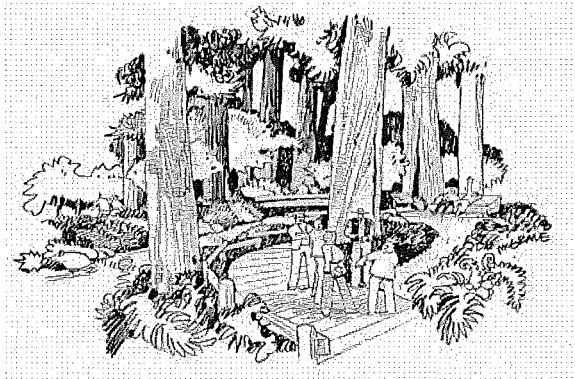
- Park Operations

Evolved Cultural Landscape

- Historic Immersion
- Natural

Note: Buildings are shown in a darker shade in each zone.

Restored banks of Redwood Creek along with redesigned segments of the main trail improve ecological functions and conditions for visitors in the forest.



redesigned entry area. To allow visitor parking to be reconfigured, the native plant nursery would be relocated to Lower Redwood Creek as part of a stewardship center.

In order to improve pedestrian safety and protect Redwood Creek, the park would collaborate with Marin County and California State Parks to restrict shoulder parking along Muir Woods Road as alternative transportation becomes more readily available.

Redwood Forest and Redwood Creek

Interpretive Corridor Zone (Large Corridor Around Redwood Creek)

This area would be managed as a setting where visitors discover and interact with the features of the primeval redwood forest. Each of the existing trails within the monument would be managed to unveil a different story and experience using creative interpretive approaches that are appropriate to the majestic old-growth forest. The trails would be designed and managed to provide visitors with opportunities to learn, explore, and become immersed in the resources that illustrate a particular theme. Examples of thematic trails could include an ecology-themed trail that leads visitors to examine the forest structure and the dynamic habitats of the creek. Another trail would highlight a century of conservation history and quietly usher visitors into Cathedral Grove. Some trails would start at the main entrance and highlight the main redwood groves along the creek. Others would bring visitors down into the woods from higher in the canyon.

The Dipsea Trail and other trails from Mount Tamalpais State Park also would be highlighted, offering opportunities for self-discovery. The experience would be further reinforced through ranger-led activities that engage the visitor with the monument's natural and cultural resources.

Portions of the main trail and bridges could be relocated to allow for creek and floodplain restoration and improvements to the integrity of the redwood forest ecosystem.

The Administration-Concession Building would transition to support interpretive and educational activities, providing flexible classroom and program space in the woods. Nonhistoric and nonessential additions made to this structure and its surroundings would be removed to reduce development in the monument. The adjacent restroom building would be retained.

The historic structures and features that represent the conservation movement would be preserved and rehabilitated and used to support visitor programming and services. These include the former Superintendent's Residence, equipment shed, garage, trails, monuments, and named groves. The historic creek stabilization rock work could be removed in targeted areas to restore natural creek functions important to forest health.

Sensitive Resources Zone (Upper North-Facing Slopes of the Canyon)

These areas would be managed to preserve the redwood forest and natural sounds that provide a backdrop to the adjacent interpretive corridor zone. Visitor access to this area would be carefully managed and limited to retain the pristine setting and protect its resources.

Natural Zone (Western Portion of the National Monument)

This area of the monument would be managed to preserve natural systems and contribute to the primeval forest setting. Visitors within this zone would have opportunities for self-discovery and challenge on the Ben Johnson and Dipsea trails in a more dispersed and wild park setting.

Muir Woods Addition (Also Known As Camino Del Canyon, Conlon Avenue, and Druid Heights)

Natural Zone

The area would be managed to provide low-impact, trail-based day uses and restore native habitat and natural processes with emphasis on removal of roads, nonhistoric structures, stabilization of sediment sources, re-establishment of natural drainage patterns, restoration of the tributary creek, and removal of invasive vegetation that has escaped from developed areas.

Camino del Canyon would be converted to a trail with access by foot or light service vehicle. Some historic structures associated with the bohemian community at Druid Heights would be preserved to the extent practicable and consistent with limited access. Camp Hillwood could be preserved to the extent that this would not compromise natural resource values. If retained, use of the main building could be for park operations or limited visitor programs and uses consistent with the surrounding natural zone. The segment of Conlon Avenue extending from the lift station to the camp could be realigned to restore natural processes and conditions for the tributary to Redwood Creek.

Diverse Opportunities Zone (Lower Conlon Avenue from Muir Woods Road to the Lift Station)

A small parking area and trailhead would be situated in this zone. The park would explore a more sustainable wastewater treatment process to eventually replace the existing lift station. Other existing operational functions (maintenance and native plant nursery) would be relocated to the Lower Redwood Creek site (former Banducci flower farm) or in potential shared facilities with Mount Tamalpais State Park nearby at Kent Canyon.

Kent Canyon, Mount Tamalpais State Park

The park would work with California State Parks to achieve common objectives for this area. Collaboration would focus on maintenance, parking, and trails. Most maintenance functions in the monument would be relocated here to facilities shared with Mount Tamalpais State Park. This action would be subject to an agreement with California State Parks.

Costs and Capital Projects

The plan describes the maximum potential capital improvements; lesser improvements may be implemented or built in phases if necessary. Implementation of the approved plan would depend on future funding. The approval of this plan does not guarantee that the funding and staffing needed to implement the plan will be forthcoming. Full implementation of the actions in the approved general management plan could be many years in the future. Additionally, some of the future long-term funding needed to implement the various actions called for in the plan is anticipated to come from nonfederal partners, consistent with the park's current practices. All costs are in 2009 dollars.

Annual Operating Costs

The annual operating costs comprise the current annual operating costs, with changes made to reflect additional staffing needs. The annual operating cost is estimated at \$32,000,000.

Staffing Requirements

Total additional staff needed would be 46 FTE.

One-time Capital Costs

One-time costs are estimated at \$152,850,000 over the life of the general management plan. The following tables describe costs in each park area. One-time capital costs for elements common to all action alternatives (not included in this *Summary Edition*) are estimated at \$33,200,000.

One-Time Capital Costs for Park Lands in Marin, San Francisco, and San Mateo Counties

FACILITY REHABILITATION

Fort Barry / Fort Cronkhite: visitor access improvements

Fort Funston: visitor facilities improvements

Fort Miley: improve visitor access and facilities*

Lower Redwood Creek: improve trail connections*

Lower Redwood Creek: stewardship center and landscape improvements

Oakwood, Marin City Ridge, Gerbode: improve trail connections to local communities*

Oakwood, Marin City Ridge, Gerbode: visitor access improvements

Other Marin County projects

Other San Francisco projects*

Other San Mateo County projects*

Rancho Corral de Tierra: equestrian facilities improvements

Rancho Corral de Tierra: trails system development

Stinson Beach: replace restrooms, showers, parking

Stinson Beach: replace visitor contact facility

Tennessee Valley: improve main multiuse trail*

Tennessee Valley: stewardship center and environmental education

Tennessee Valley: trailhead improvements

Thornton Beach/Mussel Rock: improve trail and trailhead*

HISTORIC PRESERVATION

Marin Headlands seacoast fortifications: stabilization and rehabilitation*

China Beach: rehabilitate structures and parking

Fort Barry/Fort Cronkhite: rehabilitate and relocate visitor contact facility

Fort Mason: stabilize Pier 4*

Fort Miley: rehabilitate historic structures*

Ocean Beach: rehabilitate O'Shaughnessy seawall

Sheldance Nursery: rehabilitate for park operational uses and stewardship center*

Other San Mateo County historic preservation projects*

(continued)

NATURAL RESOURCE RESTORATION

Marin County sites, including Stinson Beach and Tennessee Valley

San Francisco: Ocean Beach, Fort Funston, and Lands End

San Mateo County sites

FACILITY REMOVAL

Lower Tennessee Valley: remove roads and nonhistoric structures

Capehart housing: remove units north of Bunker Road

NEW CONSTRUCTION

Fort Funston: new visitor contact facility (warming hut)*

Kirby Cove: new rustic overnight accommodations*

Rancho Corral de Tierra: new trailhead and parking

Rancho Corral de Tierra: new rustic overnight accommodations*

Rancho Corral de Tierra: new stewardship and education center*

TOTAL \$49,710,000

All costs in 2009 dollars

*These projects are desirable/lower priority, and while important to full implementation of the alternative, may be accomplished with nonfederal funds or in later phases.

One-Time Capital Costs for Alcatraz Island

HISTORIC PRESERVATION

Building 64 stabilization

Building 64 rehabilitation: offices, overnight accommodations, exhibits*

Guardhouse stabilization

Guardhouse rehabilitation*

Main Prison Building stabilization and rehabilitation

Model Industries Building stabilization

New Industries Building stabilization

New Industries Building rehabilitation*

Parade Ground rehabilitation*

Post Exchange stabilization

Power Plant stabilization

Quartermaster Warehouse stabilization and rehabilitation

Recreation Yard stabilization

TOTAL \$54,380,000

All costs in 2009 dollars

*These projects are desirable/lower priority, and while important to full implementation of the alternative, may be accomplished with nonfederal funds or in later phases.

One-Time Capital Costs for Muir Woods National Monument

REHABILITATION PROJECTS

Entrance area improvements

Entry drive and parking improvements

Trail system improvements

HISTORIC PRESERVATION

Administration-Concessions building: rehabilitate for interpretation and education*

Camp Hillwood: rehabilitation*

Former Superintendent's residence and adjacent structures: rehabilitation

NATURAL RESOURCE RESTORATION

Muir Woods Addition

Areas within the Monument boundary

FACILITY REMOVAL

Minor structures and infrastructure removal

Nonhistoric structures in the Muir Woods Addition

NEW CONSTRUCTION

Off-site welcome center

TOTAL \$17,790,000

All costs in 2009 dollars

*These projects are desirable/lower priority, and while important to full implementation of the alternative, may be accomplished with nonfederal funds or in later phases.



As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historic places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

GOGA 641/128449; May 2015

U.S. Department of the Interior
National Park Service
Golden Gate National Recreation Area
Fort Mason, William J. Whalen Building
San Francisco, California 94123

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Golden Gate National Recreation Area • Muir Woods National Monument
General Management Plan/ Environmental Impact Statement: Summary Edition
U.S. Department of the Interior • National Park Service

From: Board of Supervisors, (BOS)
To: BOS-Supervisors
Subject: FW: CPUC Notification - Verizon - 09/01/2015
Attachments: CPUC Filing - Verizon - 09-01-2015.pdf

From: West Area CPUC [mailto:WestAreaCPUC@VerizonWireless.com]

Sent: Tuesday, September 01, 2015 4:06 PM

To: Masry, Omar (CPC) <omar.masry@sfgov.org>; Administrator, City (ADM) <city.administrator@sfgov.org>; Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>

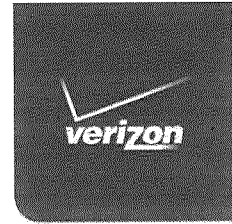
Cc: West Area CPUC <WestAreaCPUC@VerizonWireless.com>

Subject: CPUC Notification - Verizon - 09/01/2015

This is to provide your agency with notice according to the provisions of General Order No. 159A of the Public Utilities Commission of the State of California ("CPUC"). This notice is being provided pursuant to Section IV.C.2.

If you prefer to receive these notices by US Mail, please reply to this email stating your jurisdiction's preference.

Thank You



September 1, 2015

Ms. Anna Hom
Consumer Protection and Safety Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
alh@cpuc.ca.gov

RE: Notification Letter for Various Verizon Wireless Facilities
San Francisco-Oakland, CA / GTE Mobilnet of California Limited Partnership / U-3002-C

This is to provide the Commission with notice according to the provisions of General Order No. 159A of the Public Utilities Commission of the State of California ("CPUC") for the projects described in Attachment A.

A copy of this notification letter is also being provided to the appropriate local government agency for its information. Should there be any questions regarding this project, or if you disagree with any of the information contained herein, please contact the representative below.

Sincerely,

Rommel Angeles
2785 Mitchell Drive, Bldg. 9, Walnut Creek, CA 94598
(925) 279-6360

| VZW LEGAL ENTITY | JURISDICTION | PLANNING DIRECTOR | CITY ADMINISTRATOR | CLERK OF THE BOARD | COUNTY |
|-------------------------------|--|----------------------|------------------------------|--------------------------------|---------------|
| GTE Mobilnet of California LP | City of San Francisco 1 Dr. Carlton B. Goodlett Pl San Francisco, CA 94102 | omar.masry@sfgov.org | city.administrator@sfgov.org | Board of Supervisors@sfgov.org | San Francisco |

CPUC Attachment A



| Site Name | Site Address | Site APN | Site Coordinates (NAD 83) | Project Description | Number & type of Antennas | Tower Design | Tower Appearance | Tower Height (in feet) | Size of Building or NA | Type of Approval | Approval Issue Date | Approval Effective Date | Approval Permit Number | Resolution Number |
|-------------|--|---------------------------|---------------------------------|---|---------------------------|---------------------------------|---------------------------------------|------------------------|------------------------|---|---------------------|-------------------------|------------------------|-------------------|
| SF UM SC045 | 300 Montgomery Street, San Francisco CA 94104 | N/A - public right-of-way | 37°47'31.26"N 122°24'9.22"W | Installation of one 7.5" diameter x 24" tall canister antenna, two 16.5" x 9.8" x 5.7" MRRUs on to existing (28'-10" AGL) SFPUC steel streetlight pole. | 1 panel antenna | Existing steel streetlight pole | Panel antenna @ 30'-7" RAD | 31'-7" AGL | N/A | Personal Wireless Service Facility Permit | 8/21/2015 | 8/21/2015 | 15WR-0059 | N/A |
| SF UM SC047 | 500 Sansome, San Francisco CA 94109 | N/A - public right-of-way | 37°47'41.75"N 122°24'5.22"W | Installation of one 7.5" diameter x 24" tall canister antenna, two 16.5" x 9.8" x 5.7" MRRUs on to existing (24'-7" AGL) SFMTA steel streetlight pole. | 1 cylinder antenna | Existing steel streetlight pole | Cylinder antenna at 28'-6" RAD center | 27'-6" AGL | N/A | Personal Wireless Service Facility Permit | 8/28/2015 | 8/28/2015 | 15WR-0389 | N/A |
| SF UM SC056 | 394 Pacific Avenue San Francisco CA 94111 | N/A - public right-of-way | 37°47'50.94"N 122°24'6.90"W | Installation of one 7.5" diameter x 24" tall canister antenna, two 16.5" x 9.8" x 5.7" MRRUs on to existing (29' AGL) SFPUC steel streetlight pole. | 1 panel antenna | Existing steel streetlight pole | Panel antenna @ 30'-9" RAD | 31'-9" AGL | N/A | Personal Wireless Service Facility Permit | 8/21/2015 | 8/21/2015 | 15WR-0060 | N/A |
| SF UM SC069 | 2340 Stockton Street, San Francisco CA 94133 | N/A - public right-of-way | 37°48'27.50"N 122°24'38.09"W | Installation of one 7.5" diameter x 24" tall canister antenna, two 16.5" x 9.8" x 5.7" MRRUs on to existing (28'-8" AGL) SFPUC steel streetlight pole. | 1 panel antenna | Existing steel streetlight pole | Panel antenna @ 30'-5" RAD | 31'-5" AGL | N/A | Personal Wireless Service Facility Permit | 8/21/2015 | 8/21/2015 | 15WR-0073 | N/A |
| SF UM SC072 | 2650 Mason Street, San Francisco CA 94133 | N/A - public right-of-way | 37°48'28.66"N 122°24'50.49"W | Installation of one 7.5" diameter x 24" tall canister antenna, two 16.5" x 9.8" x 5.7" MRRUs on to existing (28'-8" AGL) SFPUC steel streetlight pole. | 1 panel antenna | Existing steel streetlight pole | Panel antenna @ 30'-5" RAD | 31'-5" AGL | N/A | Personal Wireless Service Facility Permit | 8/21/2015 | 8/21/2015 | 15WR-0183 | N/A |
| SF UM SC081 | 337 North Point Street, San Francisco CA 94133 | N/A - public right-of-way | 37°48'23.78"N 122°24'47.64"W | Installation of one 7.5" diameter x 24" tall canister antenna, two 16.5" x 9.8" x 5.7" MRRUs on to existing (28'-8" AGL) SFPUC steel streetlight pole. | 1 panel antenna | Existing steel streetlight pole | Panel antenna @ 30'-5" RAD | 31'-5" AGL | N/A | Personal Wireless Service Facility Permit | 8/21/2015 | 8/21/2015 | 15WR-0078 | N/A |
| SF UM SC137 | 1733 Leavenworth Street San Francisco 94109 | N/A - public right-of-way | 37°47'49.47"N 122°25'1.32"W | Installation of one 7.5" diameter x 24" tall canister antenna, two 16.5" x 9.8" x 5.7" MRRUs on to existing (28'-10" AGL) SFPUC steel streetlight pole. | 1 panel antenna | Existing steel streetlight pole | Panel antenna @ 30'-7" RAD | 31'-7" AGL | N/A | Personal Wireless Service Facility Permit | 8/21/2015 | 8/21/2015 | 15WR-0101 | N/A |
| SF UM SC140 | 1304 Lombard Street, San Francisco CA 94109 | N/A - public right-of-way | 37°48'5.82"N 122°25'23.02"W | Installation of one 7.5" diameter x 24" tall canister antenna, two 16.5" x 9.8" x 5.7" MRRUs on to existing (29' AGL) SFPUC steel streetlight pole. | 1 panel antenna | Existing steel streetlight pole | Panel antenna @ 30'-9" RAD | 31'-9" AGL | N/A | Personal Wireless Service Facility Permit | 8/21/2015 | 8/21/2015 | 15WR-0102 | N/A |
| SF UM SC155 | 1822 Jones Street, San Francisco CA 94109 | N/A - public right-of-way | 37°47'53.28"N 122°24'55.47"W | Installation of one 7.5" diameter x 24" tall canister antenna, two 16.5" x 9.8" x 5.7" MRRUs on to existing (28'-10" AGL) SFPUC steel streetlight pole. | 1 panel antenna | Existing steel streetlight pole | Panel antenna @ 30'-7" RAD | 31'-7" AGL | N/A | Personal Wireless Service Facility Permit | 8/21/2015 | 8/21/2015 | 15WR-0120 | N/A |
| SF UM SC174 | 649 Pine Street, San Francisco CA 94108 | N/A - public right-of-way | 37°47'28.87"N 122°24'23.18"W | Installation of one 7.5" diameter x 24" tall canister antenna, two 16.5" x 9.8" x 5.7" MRRUs on to existing (28'-8" AGL) SFPUC steel streetlight pole. | 1 panel antenna | Existing steel streetlight pole | Panel antenna @ 30'-5" RAD | 31'-5" AGL | N/A | Personal Wireless Service Facility Permit | 8/21/2015 | 8/21/2015 | 15WR-0115 | N/A |
| SF UM SC185 | 151 Union Street, San Francisco CA 94111 | N/A - public right-of-way | 37°48'4.78"N 122°24'8.32"W | Installation of one 7.5" diameter x 24" tall canister antenna, two 16.5" x 9.8" x 5.7" MRRUs on to existing (28'-10" AGL) SFPUC steel streetlight pole. | 1 panel antenna | Existing steel streetlight pole | Panel antenna @ 30'-7" RAD | 31'-7" AGL | N/A | Personal Wireless Service Facility Permit | 8/21/2015 | 8/21/2015 | 15WR-0118 | N/A |
| SF UM SC206 | 1620 Jones Street, San Francisco CA 94109 | N/A - public right-of-way | 37°47'46.65"N 122°24'54.14"W | Installation of one 7.5" diameter x 24" tall canister antenna, two 16.5" x 9.8" x 5.7" MRRUs on to existing (29' AGL) SFPUC steel streetlight pole. | 1 panel antenna | Existing steel streetlight pole | Panel antenna @ 30'-9" RAD | 31'-9" AGL | N/A | Personal Wireless Service Facility Permit | 8/21/2015 | 8/21/2015 | 15WR-0129 | N/A |
| SF UM SC216 | 1044 Jones Street, San Francisco CA 94109 | N/A - public right-of-way | 37°47'26.78"N 122°24'50.22"W | Installation of one 7.5" diameter x 24" tall canister antenna, two 16.5" x 9.8" x 5.7" MRRUs on to existing (24'-7" AGL) SFPUC steel streetlight pole. | 1 cylinder antenna | Existing steel streetlight pole | Cylinder antenna at 28'-6" RAD center | 27'-6" AGL | N/A | Personal Wireless Service Facility Permit | 8/28/2015 | 8/28/2015 | 15WR-0134 | N/A |
| SF UM SC244 | 729 Leavenworth Street, San Francisco CA 94109 | N/A - public right-of-way | 37°47'16.50"N 122°24'54.64"W | Installation of one 7.5" diameter x 24" tall canister antenna, two 16.5" x 9.8" x 5.7" MRRUs on to existing (28'-10" AGL) SFPUC steel streetlight pole. | 1 panel antenna | Existing steel streetlight pole | Panel antenna @ 30'-7" RAD | 31'-7" AGL | N/A | Personal Wireless Service Facility Permit | 8/21/2015 | 8/21/2015 | 15WR-0145 | N/A |
| SF UM SC278 | 1421 Pine Street, San Francisco CA 94109 | N/A - public right-of-way | 37°47'22.90"N 122°25'10.06"W | Installation of one 7.5" diameter x 24" tall canister antenna, two 16.5" x 9.8" x 5.7" MRRUs on to existing (28'-10" AGL) SFPUC steel streetlight pole. | 1 panel antenna | Existing steel streetlight pole | Panel antenna @ 30'-7" RAD | 31'-7" AGL | N/A | Personal Wireless Service Facility Permit | 8/21/2015 | 8/21/2015 | 15WR-0197 | N/A |

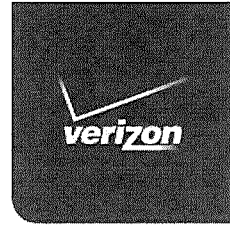
From: Board of Supervisors, (BOS)
To: BOS-Supervisors
Subject: FW: CPUC Notification - Verizon Wireless - Maritime Plaza
Attachments: CPUC Filing - Verizon - Maritime Plaza.pdf

From: West Area CPUC [mailto:WestAreaCPUC@VerizonWireless.com]
Sent: Saturday, September 05, 2015 12:27 PM
To: Masry, Omar (CPC) <omar.masry@sfgov.org>; Administrator, City (ADM) <city.administrator@sfgov.org>; Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Cc: West Area CPUC <WestAreaCPUC@VerizonWireless.com>
Subject: CPUC Notification - Verizon Wireless - Maritime Plaza

This is to provide your agency with notice according to the provisions of General Order No. 159A of the Public Utilities Commission of the State of California ("CPUC"). This notice is being provided pursuant to Section IV.C.2.

If you prefer to receive these notices by US Mail, please reply to this email stating your jurisdiction's preference.

Thank You



September 5, 2015

Ms. Anna Hom
Consumer Protection and Safety Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
alh@cpuc.ca.gov

RE: Notification Letter for Maritime Plaza
San Francisco-Oakland, CA / GTE Mobilnet of California Limited Partnership / U-3002-C

This is to provide the Commission with notice according to the provisions of General Order No. 159A of the Public Utilities Commission of the State of California ("CPUC") for the project described in Attachment A.

A copy of this notification letter is also being provided to the appropriate local government agency for its information. Should there be any questions regarding this project, or if you disagree with any of the information contained herein, please contact the representative below.

Sincerely,

Eric Waldspurger
2785 Mitchell Drive, Bldg #9, Walnut Creek, CA 94598
(925) 279-6496

CPUC Attachment A



| | |
|--------------------------|--|
| Site Name | Maritime Plaza PCS |
| Legal Entity | GTE Mobilnet of California Limited Partnership |
| Type of Project | Modification to existing VZW site |
| Street Address of Site | 222 Front Street |
| Site Location City | San Francisco |
| Site Location Zip Code | 94111 |
| Site Location County | San Francisco |
| Site Location APN Number | 0236-006 |

| | | | |
|------------------|---------|---------|---------|
| Site Coordinates | | | |
| | Degrees | Minutes | Seconds |
| Latitude | 37 | 79 | 37.33 |
| Longitude | 122 | 39 | 85.81 |
| NAD 83 | | | |

Brief Description of Project

Remove (4) antennas, (2) per sector and replace with (4) new antennas, (2) per sector, on existing pipe mounts; install (2) RRH units (RRUS-12 with A2 units), (1) per sector; remove (2) AWS RRH units (RRUS-11) and replace with (2) AWS RRH units (RRUS-12 with A2 backpacks); remove (2) diplexers and replace with (2) LTE-TMA's (TMA-T-DB78-DD-A/E15R05P19) at antennas; install (2) TMA/diplexer (CBC78-DF-2X) for LTE/850, within equipment room; reuse all existing coax and hybrid cables. NOTE: antennas and equipment to be painted to match.

Number & type of Antennas / Dishes

| |
|-------------------------------------|
| 4 panel antennas, 2 GPS antennas |
| Rooftop, Non-screened/Non-stealthed |
| Antennas mounted at 93.8' RAD |
| 97' |
| N/A |

Tower Design

Tower Appearance

Tower Height (in feet)

Size of Building or NA

Planning Director (or equivalent)

| |
|--------------------------------|
| Wireless Planner |
| omar.masry@sfgov.org |
| City of San Francisco |
| 1650 Mission Street, Suite 400 |
| San Francisco, CA 94103 |

Contact 1 Email Address

Contact 1 Agency Name

Contact 1 Street Address

Contact 1 City, State ZIP

City Manager (or equivalent)

| |
|---------------------------------|
| City Administrator |
| city.administrator@sfgov.org |
| City of San Francisco |
| 1 Dr. Carlton B. Goodlett Place |
| San Francisco, CA 94102 |

Contact 2 Email Address

Contact 2 Agency Name

Contact 2 Street Address

Contact 2 City, State ZIP

City Clerk (or equivalent)

| |
|---------------------------------|
| Clerk of the Board |
| Board.of.Supervisors@sfgov.org |
| City of San Francisco |
| 1 Dr. Carlton B. Goodlett Place |
| San Francisco, CA 94102 |

Contact 3 Email Address

Contact 3 Agency Name

Contact 3 Street Address

Contact 3 City, State ZIP

Director of School Board

(or equivalent)

| |
|-----|
| N/A |
| |
| |
| |
| |

Contact 4 Email Address

Contact 4 Agency Name

Contact 4 Street Address

Contact 4 City, State ZIP

LAND USE OR BUILDING APPROVALS

| | |
|----------------------------|-----------------------------|
| Type of Approval Issued | Permit to Alter |
| Issue Date of Approval | 8/14/2015 |
| Effective Date of Approval | 9/3/2015 |
| Agency Name | San Francisco Planning Dept |
| Approval Permit Number | 2015.07.23.2253 |
| Resolution Number | |

| | |
|--------------------------------|--|
| Type of Approval Issued (2) | |
| Issue Date of Approval (2) | |
| Effective Date of Approval (2) | |
| Agency Name (2) | |
| Approval Permit Number (2) | |
| Resolution Number (2) | |

Notes/Comments:

| |
|--|
| |
|--|

To: Major, Erica (BOS); Somera, Alisa (BOS)
Subject: FW: 150602 and 150603 Response to Civil Grand Jury on Strengthening Whistleblower Protection Ordinance (Supervisor Christensen Comically Claimed You Have No Empirical Data — Here's the Data She Appears Not to Understand)
Attachments: Testimony to Board of Supes on Civil Grand Jury Report on the WPO 15-09-07.pdf

From: pmonette-shaw [mailto:Pmonette-shaw@earthlink.net]

Sent: Monday, September 07, 2015 4:19 PM

To: Mar, Eric (BOS) <eric.mar@sfgov.org>; Farrell, Mark (BOS) <mark.farrell@sfgov.org>; Christensen, Julie (BOS) <Julie.Christensen@sfgov.org>; Tang, Katy (BOS) <katy.tang@sfgov.org>; Breed, London (BOS) <london.breed@sfgov.org>; Kim, Jane (BOS) <jane.kim@sfgov.org>; Yee, Norman (BOS) <norman.yee@sfgov.org>; Wiener, Scott <scott.wiener@sfgov.org>; Campos, David (BOS) <david.campos@sfgov.org>; Cohen, Malia (BOS) <malia.cohen@sfgov.org>; Avalos, John (BOS) <john.avalos@sfgov.org>; Calvillo, Angela (BOS) <angela.calvillo@sfgov.org>

Cc: Derek Kerr,MD <DerekonVanNess@aol.com>

Subject: Response to Civil Grand Jury on Strengthening Whistleblower Protection Ordinance (Supervisor Christensen Comically Claimed You Have No Empirical Data — Here's the Data She Appears Not to Understand)

September 7, 2015

San Francisco Board of Supervisors

The Honorable Eric Mar, Supervisor, San Francisco Board of Supervisors, District 1
The Honorable Mark Farrell, Supervisor, San Francisco Board of Supervisors, District 2
The Honorable Julie Christensen, Supervisor, San Francisco Board of Supervisors, District 3
The Honorable Katy Tang, Supervisor, San Francisco Board of Supervisors, District 4
The Honorable London Breed, Supervisor, San Francisco Board of Supervisors, District 5
The Honorable Jane Kim, Supervisor, San Francisco Board of Supervisors, District 6
The Honorable Norman Yee, Supervisor, San Francisco Board of Supervisors, District 7
The Honorable Scott Wiener, Supervisor, San Francisco Board of Supervisors, District 8
The Honorable David Campos, Supervisor, San Francisco Board of Supervisors, District 9
The Honorable Malia Cohen, Supervisor, San Francisco Board of Supervisors, District 10
The Honorable John Avalos, Supervisor, San Francisco Board of Supervisors, District 11
Angela Calvillo, Clerk of the Board (for Petitions and Correspondence File)

1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

Response to Civil Grand Jury on Strengthening Whistleblower Protection Ordinance

Dear Board of Supervisors,

During last Thursday's Government Audit and Oversight Committee hearing to develop recommendations to the full Board of Supervisors on a response to the Civil Grand Jury's report on the Whistleblower Protection Ordinance, Supervisor Christensen comically claimed repeatedly that there is no "cause and effect" and you have no empirical data to support revisions to the WPO.

That's complete nonsense and indicative of why Christensen should be defeated in November in the election as District Three Supervisor.

First, as whistleblower Dr. Derek Kerr testified last Thursday, the Ethics Commission began assessing retaliation claims filed by City employees 20 years ago in 1995, and over those 20 years the Ethics Commission sustained none — zero — of 60 complaints filed, apparently deciding all 60 cases were spurious. That simply defies probability and provides empirical proof to counter Christensen, who appears to be wearing horse blinders.

Second, as I have previously provided you, there's plenty of data available from the City Attorney's Office to provide Christensen with substantial empirical data.

Table 1: Prohibited Personnel Practice Lawsuits, 2007 – 2015, Filed by City Employees Against the City of San Francisco

| Code | Alleged Cause | 2007–2012 Settlements | 2012–2015 Settlements | 2012–2015 Cases Pending |
|--------------|--|--------------------------|--------------------------|----------------------------|
| 6075 | Age Discrimination (Emp against City) | 2 | 4 | 5 |
| 6015 | Assault by another employee | | 1 | |
| 6020 | Compensation (Employee against City) | 7 | 7 | 2 |
| 9925 | Defamation | | | 1 |
| 6080 | Disability Discrimination (Emp v City) | 25 | 15 | 5 |
| 6005 | First Amendment Violation (Emp vs City) | | 1 | |
| 6070 | General Harassment (Emp against City) | 4 | 5 | 6 |
| 4103 | Grievance Arbitration/Labor Related Issue/PERB Mat | 10 | 8 | 3 |
| 9051 | Lit-Breach of Contract | | 1 | |
| 4099 | Other (Employee Conduct) | | 2 | 1 |
| 2099 | Other (Police) | | | 1 |
| 4599 | Other Malpractice | | | 1 |
| 6099 | Other-Actions by Employees against City | 15 | 24 | 16 |
| | Overtime Discrimination | 1 | | |
| 4104 | Prevailing Wage Enforcement | | | 1 |
| 6035 | Racial Discrimination (Emp agst. City) | 18 | 16 | 11 |
| 6055 | Racial Harassment (Emp against City) | | 2 | |
| 4025 | Racial Harassment (Employee Conduct) | | 1 | |
| 4810 | Retirement | | 1 | 1 |
| 6030 | Sexual Discrimination (Emp against City) | 2 | 5 | |
| 6050 | Sexual Harassment (Emp against City) | 6 | 3 | 2 |
| 4020 | Sexual Harassment (Employee Conduct) | | 1 | |
| 4030 | Sexual Orient. Harass. (Emp. Conduct) | | | 1 |
| 6040 | Sexual Orientation Discrim (Emp vs City) | | 1 | |
| | Unknown Issue | 1 | | |
| 6010 | Wrongful Termination (Emp agst. City) | 14 | 23 | 9 |
| Total | | 105 | 121 | 66 |

Of the 105 cases settled between 2007 and 2012, all of them — 100% — resulted in settlements being paid to the complainants. Of the 121 lawsuits filed between 2012 and 2015, 26 (21.5%) resulted in settlements that totaled \$3.6 million. Of the 121 cases, fully 116 (96%) involved City Attorney staff time and expenses totaling \$8.6 million.

Of the 226 lawsuits concluded in the eight years between 2007 and 2015, fully 131 resulted in settlements to the plaintiffs, representing 58% of the lawsuits filed.

The 292 civil court actions have been filed involving prohibited personnel practices has already cost the City \$32.6 million between settlement agreements and costs of the City Attorney's staff time and expenses since 2007, but that only included Kelly O'Haire's settlement. Adding \$754,000 in City Attorney time for O'Haire's case, we're up to \$33.35 million. By the time Joanne Hoeper's case against the City Attorney is settled, it will probably involve another \$750,000 settlement and another \$750,000 in City Attorney costs, pushing the total to \$35 million.

And as of June 3, 2015 there's at least another 66 cases that have not yet been settled in court, with more likely pending by now. The sheer number of 292 lawsuits demonstrates that these cases are not "spurious," as the Mayor falsely claimed in his response to the Grand Jury.

Prohibited personnel practice lawsuits have soared under Mayor Lee with 187 new cases, a 78% increase from 105 cases before his tenure. Wrongful termination lawsuits during Lee's tenure have climbed from 14 to 32, a 128.6% increase.

This data illustrates that the Ethics Commission erred in finding zero retaliation complaints out of 60 filed during the past two decades.

How much more "empirical" data does Ms. Christensen need to see to be able to understand that there's a clear problem demanding a quick solution?

Reject the GAO's "Will Not Be Implemented" Recommendations

The full Board should reject the "disagree partially" and "will not be implemented" recommended responses to the Grand Jury, precisely because Supervisor Breed acknowledges there is a problem with City employees not being protected, and indicated that the Board will work with the Ethics Commission to strengthen the WPO. Supervisor Breed said during Thursday's GAO hearing:

"I do think that we as a Board need to work with the Ethics Commission to try and figure out legislation specifically that will help strengthen the ordinance in order to make it more effective based on the recommendations of the [Grand Jury's] report and unfortunately with the way this process is designed it makes it difficult for us to basically make commitments to that other than to say we'll work on it. But I do think it is important to provide a response to the Civil Grand Jury in a timely manner because it has to go through the legislative process, but that we are consistent and saying that we will work with the Ethics Commission on strengthening the legislation and take it through the legislative process for approval because clearly there is a loophole *and individuals are not being protected appropriately.*"

The 39,122 employees on the City's payroll at the end of June 2015 expect this Board to revise the WPO immediately, since the current ordinance does not meet the mandates in the City Charter that you enact a meaningful WPO.

This should be a relatively simple matter to 1) Expand the types of processes that can be used to file whistleblower complaints, and 2) Expand the types of complaints that can be filed.

Of particular importance is that the Board should sponsor with the Ethics Commission legislation to amend the City Charter to update Section 4.115 of San Francisco's Campaign and Government Conduct Code which does **not** provide retaliation protections for employees who engage in using First Amendment free speech and subsequently face retaliation. You owe it to City employees to change San Francisco's Charter and the WPO to include basic First Amendment protections for City employees.

And you owe it to the Civil Grand Jury to respond saying "will be implemented" or "requires further analysis," rather than using the foolish "will not be implemented" recommendation, since Supervisor Breed appears to be saying that the WPO needs to be, and will be, amended.

Respectfully submitted,

Patrick Monette-Shaw
Columnist
Westside Observer Newspaper

cc: Angela Calvillo, Clerk of the Board

Derek Kerr, MD, CNA, Whistleblower

Patrick Monette-Shaw

975 Sutter Street, Apt. 6
San Francisco, CA 94109

Phone: (415) 292-6969 • e-mail: pmonette-shaw@eartlink.net

September 7, 2015

San Francisco Board of Supervisors

The Honorable Eric Mar, Supervisor, San Francisco Board of Supervisors, District 1
The Honorable Mark Farrell, Supervisor, San Francisco Board of Supervisors, District 2
The Honorable Julie Christensen, Supervisor, San Francisco Board of Supervisors, District 3
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The Honorable John Avalos, Supervisor, San Francisco Board of Supervisors, District 11
Angela Calvillo, Clerk of the Board (for Petitions and Correspondence File)

1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

Response to Civil Grand Jury on Strengthening Whistleblower Protection Ordinance

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That's complete nonsense and indicative of why Christensen should be defeated in November in the election as District Three Supervisor.

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September 7, 2015

Response to Civil Grand Jury on Strengthening Whistleblower Protection Ordinance

Page 2

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| 6080 | Disability Discrimination (Emp v City) | 25 | 15 | 5 | 45 |
| 6005 | First Amendment Violation (Emp vs City) | | 1 | | 1 |
| 6070 | General Harassment (Emp against City) | 4 | 5 | 6 | 15 |
| 4103 | Grievance Arbitration/Labor Related Issue/PERB Mat | 10 | 8 | 3 | 21 |
| 9051 | Lit-Breach of Contract | | 1 | | 1 |
| 4099 | Other (Employee Conduct) | | 2 | 1 | 3 |
| 2099 | Other (Police) | | | 1 | 1 |
| 4599 | Other Malpractice | | | 1 | 1 |
| 6099 | Other-Actions by Employees against City | 15 | 24 | 16 | 55 |
| | Overtime Discrimination | 1 | | | 1 |
| 4104 | Prevailing Wage Enforcement | | | 1 | 1 |
| 6035 | Racial Discrimination (Emp agst. City) | 18 | 16 | 11 | 45 |
| 6055 | Racial Harassment (Emp against City) | | 2 | | 2 |
| 4025 | Racial Harassment (Employee Conduct) | | 1 | | 1 |
| 4810 | Retirement | | 1 | 1 | 2 |
| 6030 | Sexual Discrimination (Emp against City) | 2 | 5 | | 7 |
| 6050 | Sexual Harassment (Emp against City) | 6 | 3 | 2 | 11 |
| 4020 | Sexual Harassment (Employee Conduct) | | 1 | | 1 |
| 4030 | Sexual Orient. Harass. (Emp. Conduct) | | | 1 | 1 |
| 6040 | Sexual Orientation Discrim (Emp vs City) | | 1 | | 1 |
| | Unknown Issue | 1 | | | 1 |
| 6010 | Wrongful Termination (Emp agst. City) | 14 | 23 | 9 | 46 |
| Total | | 105 | 121 | 66 | 292 |

Of the 105 cases settled between 2007 and 2012, all of them — 100% — resulted in settlements being paid to the complainants. Of the 121 lawsuits filed between 2012 and 2015, 26 (21.5%) resulted in settlements that totaled \$3.6 million. Of the 121 cases, fully 116 (96%) involved City Attorney staff time and expenses totaling \$8.6 million.

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September 7, 2015

Response to Civil Grand Jury on Strengthening Whistleblower Protection Ordinance

Page 3

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And you owe it to the Civil Grand Jury to respond saying "will be implemented" or "requires further analysis," rather than using the foolish "will not be implemented" recommendation, since Supervisor Breed appears to be saying that the WPO needs to be, and will be, amended.

Respectfully submitted,

Patrick Monette-Shaw
Columnist
Westside Observer Newspaper

cc: Angela Calvillo, Clerk of the Board
Derek Kerr, MD, CNA, Whistleblower



大阪市長
Maire d'Osaka
Sindaco di Osaka
Alcalde de Osaka

MAYOR OF OSAKA
CITY HALL
OSAKA, JAPAN

오사카시장
Oberbürgermeister von Osaka
Mep Osaka
Prefeito de Osaka

CPages

August 27, 2015

Dear Board of Supervisors of the City and County of San Francisco,

I would like to notify you that I have read the "Resolution Urging the Establishment of a Memorial for 'Comfort Women'" currently pending in the Board of Supervisors of the City and County of San Francisco.

I am aware that this resolution is still under deliberation, and will be referred to the committee for further consideration, and presumably there will be a public meeting in which public opinions will be openly expressed. I would therefore like to take this opportunity to express my thoughts at this moment as the mayor of one of your sister cities.

Please allow me to respond to your resolution in detail in the form of an open letter, so that the citizens of San Francisco can directly read the letter and understand my views. I hope that this may be of some use during the decision-making process.

We must bring about efforts to strive for a world where the dignity and human rights of women, both having universal value, are protected on the battlefield as well

In today's 21st century, women's dignity and human rights have been recognized as having universal value. This is indeed an enormous achievement made by humankind. However, in reality, the issue of violations of the dignity of women by soldiers has not been eradicated. We must strive for a future where women's rights are respected all over the world.

What is essential for that purpose is to directly face what has happened in the past and what is happening right now. Each nation in the world, including Japan, should squarely face the past violations of women's rights on the battlefield by its own soldiers. Each nation and its citizens should come together, be fully determined not to repeat the same mistakes in the future, bring about efforts to protect the dignity of women who are under threat in areas of regional conflict in the present-day world, and create a future where women's rights are respected all over the world.

I am in favor of activities to protect the dignity and human rights of women. However, if the purpose is to protect the human rights of women, I would suggest that some of the special attention currently being given to Japan's "comfort women" issue should be broadened to memorialize all the women who have been sexually assaulted and abused by soldiers of countries in the world, and should represent a pledge to the world that we will never allow the same offense and tragedy to happen again.

The violation of the dignity of women by soldiers during wartime is a common problem in many parts of the world. Each nation in the world, including Japan, should address this unacceptable problem as a “common” issue for human beings. It is also an undeniable historical fact that troops of countries around the world as well as those of wartime Japan used women for sexual purposes on the battlefield. It is regrettable that even to this day, there are many news reports on women and children being sexually abused on the battlefield.

Reject the denial of the “comfort women” issue; expressing understanding and remorse towards the indescribable pain and suffering inflicted on “comfort women”

It goes without saying that the use of “comfort women” by Japanese soldiers before and during World War II was an unforgivable act that violated the dignity and human rights of women. I am aware that the great pain inflicted on those who were forced to work as “comfort women” against their will and the deep emotional scars they have borne afterwards are beyond description.

Therefore, I am not on the side of any attempts to justify Japan’s “comfort women” issue in any sense, nor do I intend to do so in the future. Japan must express deep remorse and offer a sincere apology to former “comfort women,” and show determination not to repeat the same mistakes and tragedies in the future.

However, trivializing the issue by singling out Japan will not lead to resolving it as a global issue

On the other hand, the issue of sex on the battlefield is not a problem particular to the former Japanese army. This problem was present during World War II with the American, British, French, German, and Soviet armies, as well as during the Korean War and Vietnam War with the South Korean Army.

I have no intention to legitimize or defend the problem of “comfort women” by the former Japanese Army just because the other countries have had the same issue. Still, attempts to single out and criticize only Japan will make us blind to other past atrocities and also to contemporary problems of the same kind. This issue should not be treated as an issue specific solely to the Japanese military. As long as widespread sexual problems on the battlefields by countries other than Japan are not openly recognized, past offenses, which the whole world must face, will go uncorrected, and those violations in other parts of the world will not be resolved. This is my biggest concern.

Counterargument for Japan's case being called "exceptional"

There are two reasons behind why Japan's comfort women issue is called "exceptional." One is the change in attitude by the Republic of Korea, and the other is the clever development of their argument to persuade people to accept mistaken notions as true.

Firstly, the change in attitude by the Republic of Korea is a big factor. Disputes between Japan and the Republic of Korea from the colonial period have already been resolved through signing the Treaty on Basic Relations between Japan and the Republic of Korea and Agreement between Japan and the Republic of Korea Concerning the Settlement of Problems in Regard to Property and Claims and Economic Cooperation. However, the Republic of Korea has recently claimed that the "comfort women" issue has not been included in the agreements.

There is a big difference in acknowledgement between the two countries with regard to legal responsibilities. From Japan's standpoint, the government acknowledges that they have inflicted indescribable suffering on "comfort women," but believes that the issue has been resolved with the signing of treaties, and therefore does not need to accept further legal responsibility, whereas the Republic of Korea disagrees because they do not believe the legal disputes were resolved by the peace treaties.

I agree that Japan bears moral responsibility in global society. However, with the Japanese Government having already provided the appropriate compensations according to the above treaties, as well as from an international law standpoint, it is unrealistic to expect Japan to take on any further legal responsibility for this issue.

If there are exceptional cases in which we could hold people accountable, then it should be for "incomparable" acts of genocide or crimes against humanity such as the Holocaust, where individuals involved would be charged for committing such war crimes, with no statutes of limitation.

It is similar to what is stated in the United Nations Security Council Resolution 1325 of 2000, Article 11, which emphasizes the need to exclude "genocide, crimes against humanity, and war crimes...from amnesty provisions" indicating the need to prosecute those responsible without statutes of limitations or regardless of treaties.

In recent years, the Korean side has strengthened its criticisms now, repeatedly claiming that Japan's "comfort women" issue involves a crime against humanity.

This leads to the second factor, which is the clever development of their argument to emphasize the "comfort women" issue as if it were an act of genocide or crime against humanity, when it is not. There seem to be activists and reports that argue

that the use of “comfort women” during wartime is an act of genocide or crime against humanity, but these are not correct.

If we focus on the argument that the “comfort women” issue is genocide or a crime against humanity, then the accuracy of the terminology in the inscription of the “comfort women” memorial, such as “kidnapped by the Imperial Japanese Army,” “forced into sexual slavery,” and “200,000” women and young girls, is an important point to clarify. To seek the true nature of the problem, there needs to be some verification regarding the inhumane treatment of “comfort women,” including further investigation on whether the state authority of Japan was systematically involved in the coercive recruitment of “comfort women.” It is obvious that these terms are not accurate, from the information that was recently made public and in the light of other actively debated topics.

To give an example, the Coomaraswamy Report (submitted in 1996 by Ms. Radhika Coomaraswamy, the Special Rapporteur on violence against women to the UN Commission on Human Rights) states that “comfort women” were “military sex slaves.” The testimony of Seiji Yoshida is used as evidence, in which he states that he had “taken part in the slave raids where as many as 1,000 women were obtained for ‘comfort women’ duties.” Yoshida himself has acknowledged that his testimony had been fabricated, and the Asahi Shimbun, which had been reporting on the “comfort women” issue, also concluded Yoshida’s testimony as false on August 5, 2014 and retracted a series of articles that said many Korean women were “forcibly taken away” to become “comfort women.” This caused a big controversy in Japan and is still fresh in our memories.

Against this backdrop, in October 2014, the Japanese Government requested that part of the Coomaraswamy Report (the portion based on Yoshida’s falsified testimony which stated that the Imperial Japanese Army had forcibly taken away “comfort women” from the Republic of Korea) be retracted, but was rejected because Coomaraswamy argued that Yoshida’s testimony was only one part of the evidence. In addition, the Coomaraswamy Report uses *The Comfort Women* written by the journalist George Hicks as the main source of reference; however, researchers have pointed out that this book lacks sufficient evidence.

The Coomaraswamy Report itself is a 50-page-long report on violence against women. The “comfort women” issue is mentioned in the “Report on the mission to the Democratic People’s Republic of Korea, the Republic of Korea and Japan on the issue of military sexual slavery in wartime,” which is one of the two documents attached to the report. The United Nations Commission on Human Rights adopted a 6-page resolution called “The Elimination of Violence against Women,” which uses Coomaraswamy’s special report as a reference. The resolution states that it “welcomes” the work of the Special Rapporteur. However, it only “takes note” of the attached document, which means that the document was not highly evaluated enough to be “welcomed.” If the Coomaraswamy report had been appreciated at the

highest level, the resolution would have “commended” it. Therefore, we can conclude that the UN Commission on Human Rights does not “endorse” the notion that “comfort women” were “sex slaves.”

Let me show you another example. During World War II, according to the high school world history textbook *Traditions & Encounters: A Global Perspective on the Past*, published by McGraw-Hill, a major U.S. textbook publisher, “the Japanese army forcibly recruited, conscripted, and dragooned as many as two hundred thousand women age fourteen to twenty to serve in military brothels, called ‘comfort houses’ or ‘consolation centers,’ “others were killed by Japanese soldiers, especially if they tried to escape or contracted venereal diseases,” and “at the end of the war, soldiers massacred large numbers of comfort women to cover up the operation.” The textbook contains many false statements like these that have been introduced in classroom environments as if they were true, even though they are based on the wrong perception and completely contrary to fact. When the Japanese Government asked McGraw-Hill to retract these statements as they contained serious factual errors, the author responded that this request was “an infringement on his freedom of speech and academic freedom.” This is simply wrong. It is he who criticizes the individual pointing out the factual errors who is the one infringing on the freedom of speech and academics.

On May 5, 2015, American scholars remarked in their “Open letter in support of historians in Japan” statement, “Among the many instances of wartime sexual violence and military prostitution in the twentieth century, the ‘comfort women’ system was distinguished by its large scale and systematic management under the military, and by its exploitation of young, poor, and vulnerable women in areas colonized or occupied by Japan.” However, this is not an issue of scale, nor is it one of whether or not there was systematic management by the military. We must approach this issue as a “common” problem regarding the human rights of women by military groups from countries all over the world regardless of the scale or systematic management. If people do not squarely face what was done by their own countries, treating the issue as a problem unique to Japan, it will only cause us to avert our eyes from the pain and suffering experienced by young, poor and vulnerable women in other parts of the world.

In addition, the “comfort women” issue is often regarded as the same kind of problem as the Holocaust. However, the Holocaust was an unprecedented historical crime involving an attempt at the extermination of an ethnic group. Although the “comfort women” system was an inexcusable act that violated the dignity and human rights of women, equating the issue of “comfort women,” which is one of the “common” phenomena as wartime violations of the dignity of women by soldiers, with the Holocaust, which is an incomparable act of genocide in the history of mankind, is far beyond my understanding.

In addition, organized rape that occurred during the Rwanda Genocide in 1994 was

judged as an act of genocide at the International Criminal Tribunal for Rwanda (ICTR). In the case of the genocide in Rwanda, rape was part of an organized act of hostility with the intent to exterminate an entire group of people, whereas the comfort women system by the former Japanese Army was of a different nature in its purpose and method.

Currently, there is no concrete evidence that shows that the state authority of Japan had systematically been involved with the coercive recruitment of “comfort women.” As long as this is the case, we must conclude that Japan cannot take further legal responsibility for this issue.

There are many expressions that describe the former Japanese Army’s “comfort women” issue as “exceptional” and “distinguished.” However, this is because the depiction of Japan’s “comfort women” issue as “a clear act of genocide” has wrongly been spread across global society, on top of countries not accepting Japan’s apologies and existing peace treaties, and not being aware of Japan’s efforts.

If Japan must take legal responsibility, so must the rest of the world

If the global society persists in believing that Japan has not fulfilled its duty for accepting responsibility after signing treaties and bilateral agreements, and that Japan’s “comfort women” issue is comparable to genocide or crimes against humanity, then those countries must also be guilty of the same crime.

It is an undeniable historical fact that troops around the world as well as Japan used women for sexual purposes on the battlefield. Aside from the contentious point of whether or not the military was systematically involved, no matter what authority the orders come from and no matter what nationalities partake, the deed of making women into sexual targets violates women’s dignity.

As I said before, each nation in the world should address this problem as not just unique to Japan but as a common issue for all human beings, in other words, accept it as one of their own problems and squarely face the past. If not, the violations of women’s dignity by soldiers that still occur today will not be eradicated.

Concerns about the resolution and the problem with the inscription of the “comfort women” memorial in Glendale

My concern about the resolution is that there will be inaccurate statements written on the inscription of the memorial based on the wrong perception of the “exceptional” behavior of the former Japanese Army.

The “comfort women” memorial established in the City of Glendale in July 2013 states, “In memory of more than 200,000 Asian and Dutch women who were removed from their homes in Korea, China, Taiwan, Japan, the Philippines,

Thailand, Vietnam, Malaysia, East Timor and Indonesia, to be coerced into sexual slavery by the Imperial Armed Forces of Japan between 1932 and 1945..." This statement has no historical evidence behind it. The "Open letter in support of historians in Japan" released on May 5, 2015 and signed by 187 scholars mainly from the United States has confirmed that there is disagreement among historians regarding the precise number of "comfort women" and regarding the degree to which the former Japanese Army was involved in the recruitment of these women. Regardless, due to this memorial inscription and the wide media coverage, many people around the world will have an unconfirmed, one-sided view and will accept this as historical truth. I find this highly regrettable.

Although this resolution does not specifically state what will be included in the inscription on the memorial, I am concerned that expressions similar to those on the Glendale memorial may be used, as the resolution already contains words such as "200,000" women and young girls who were "kidnapped" and "forced into sexual slavery by the Imperial Japanese Army."

The inscription of the memorial in Glendale concludes with, "It is our sincere hope that these unconscionable violations of human rights shall never recur." I fully agree with the sentiment of this sentence. However, the problem resides in the rest of the inscription, which is what will be presented as being historically true.

As indicated in the UN Security Council Resolution 1325, during armed conflicts women and children have been particularly adversely affected by violence including sexual abuse, and this has been observed all over the world. I believe that all countries must bring about efforts to fight against sexual violence on the battlefield.

Meanwhile, the statement "of the few top Japanese military leaders who were investigated and convicted as war criminals...many escaped prosecution" is false. In the postwar war crimes tribunals, many relevant parties convicted as war criminals were prosecuted. In the Batavia Military Tribunal, Japanese military officers were found guilty for forcibly taking Dutch women from camps in Semarang, Java, and other areas in Indonesia to work at comfort stations, and one of the Japanese officers responsible was sentenced to death. In this way, those who deserved to be punished were prosecuted, including the officers who had been involved in the "comfort women" system.

Accurate understanding and perception of the truth is what will truly prevent future mistakes; that is why it is essential to eliminate inaccuracies and present the truth if the memorial is established

Allow me to repeat myself in order to avoid any misunderstandings: I have no intention of legitimizing or defending the institution of "comfort women" on the grounds that other countries besides Japan have had the same problem. Japan must face its past mistakes and express sincere remorse.

If there is any significance in establishing a “comfort women” memorial, it should be that it serves as a declaration to squarely face the past and strive for a world where every country respects the dignity and human rights of women as a universal value. Thus, if such memorial were to be established, the inscription should be written from this standpoint so that the message can be shared by the whole world.

Regardless of what soldiers from other countries have done, the violation of the dignity and human rights of women by Japanese soldiers is an unforgivable act. That is why, in addition to squarely facing the past, Japan has worked through this issue as its own problem, and has contributed to resolving the issue by making public apologies and providing compensation.

The stance of the Japanese Government, and how it has given sincere care to former “comfort women,” and the determination to create a world that protects the dignity and human rights of women

Currently, some former “comfort women” are requesting reparations from the Japanese Government. However, legal disputes (including individual compensation) between Japan and the Republic of Korea have been completely resolved with the 1965 “Treaty on Basic Relations between Japan and the Republic of Korea,” and the “Agreement between Japan and the Republic of Korea Concerning the Settlement of Problems in Regard to Property and Claims and Economic Cooperation.” In addition, China had declined Japan’s offer of compensation for individual victims, as communicated to the Ministry of Foreign Affairs of Japan, based on the premise of renouncing war reparations claims in the 1972 “Joint Communiqué of the Government of Japan and the Government of the People’s Republic of China,” and therefore there are no legal disputes between Japan and China.

Since resolving its legal disputes with the Republic of Korea and China, Japan has also made extra effort to demonstrate its acceptance of moral responsibility for “comfort women” with the establishment of the Asian Women’s Fund in 1995 by soliciting donations from Japanese citizens. The Asian Women’s Fund was started for “comfort women” all over the world, and has provided compensation for “comfort women” from four countries and one region, which include not only the Republic of Korea, but also the Philippines and Indonesia, after discussing the appropriate solutions according to each country’s circumstances. Compensation was offered to former comfort women from China as well, but it is said that the Chinese Government had declined the offer. The Asian Women’s Fund has also sent the Japanese Prime Minister’s letter of apologies and messages from Japanese citizens today. It has taken part in activities to advocate women’s dignity by supporting projects on contemporary issues, such as violence against women, in a manner reflective upon the harm done by Japan’s past atrocities to women’s dignity. In this

way, the Japanese Government has made sincere efforts along with the Asian Women's Fund's activities.

In his statement on the 70th anniversary of World War II, Prime Minister Abe displayed determination that Japan will squarely face the fact that the dignity and honor of many women were severely injured during the wars, and that Japan will lead the world in making an era in which women's human rights are not infringed upon.

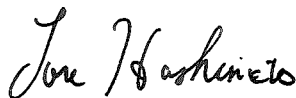
Request for consideration of Japanese in the U.S., concern about the influence on sister city relations, responsibility to create environment where young generations can live in cooperation without disputes

For today's generation, directly facing past mistakes and tragedies and remembering the people who have suffered in order to not repeat such mistakes and ease the pain of the victims is a task to be undertaken by everyone across borders. Furthermore, it is also our responsibility to create an environment for the younger generation where people can cooperate without disputes for a better future.

There are many Japanese people living in San Francisco. I am concerned that the establishment of a "comfort women" memorial will likely cause disruption amongst communities. As the mayor of Osaka, one of your sister cities, I request that you give careful consideration for the greater relationship between the United States and Japan.

By building on the strong foundation of friendship that both cities have enjoyed over many years, I sincerely hope that we can create an even better future by deepening our mutual cooperation.

Sincerely,



Toru Hashimoto
Mayor
The City of Osaka

From: Board of Supervisors, (BOS)
To: BOS-Supervisors; Calvillo, Angela (BOS); Evans, Derek; Caldeira, Rick (BOS)
Subject: File 150764 FW: Comfort Women Statue proposal in San Francisco

From: Yuriko Doi-Walker [mailto:yurikodoi@sbcglobal.net]
Sent: Saturday, September 05, 2015 10:45 PM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Subject: Comfort Women Statue proposal in San Francisco

Dear San Francisco Board of Supervisors,

I am Yuriko Doi, the Founder of Theatre Yugen which has been active in introducing Japanese theater and culture and educating Japanese arts, cross culture and international racial harmony to many children and students as well as general audience for 36 years here in San Francisco.

I do not condone what Japan did during the World War II, but I cannot agree with the building of a stature of comfort women in San Francisco. This type of statue belongs in Japan, Korea and China. In San Francisco it would just raise racial tensions between our Asian communities especially since most of them had no part in this terrible event and many also suffered during the war. I think we should create work and art that promotes harmony not divisive.

If you have any questions, please contact my e-mail at yurikodoi@sbcglobal.net or 650-575-7390(mobile).

Sincerely yours,

Yuriko Doi
Theatre of yugen, Founder & Artistic Adviser
2840 Mariposa Street,
San Francisco, CA 94110
415-621-0507

From: Board of Supervisors, (BOS)
Sent: Wednesday, September 02, 2015 10:46 AM
To: BOS-Supervisors
Subject: FW: Against the proposal of building a Comfort Women memorial File No. 150764
Attachments: Comfort Women Not Sex Slaves But Prostitutes_FullVersion.pdf

From: Koichi Mera [mailto:koichi.mera@verizon.net]
Sent: Tuesday, September 01, 2015 2:51 PM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Subject: Against the proposal of building a Comfort Women memorial

Dear Supervisors for the City of San Francisco:

I am against the proposal to build a memorial for Comfort Women.
This is so because the proposal is based on a wrong interpretation of the Comfort Women.
In addition, the proposal is motivated by a political ambition of dividing the linkage between the U.S and Japan.
It is not based on human rights.
Please look at the attachment which elaborate our arguments.

Koichi Mera
Los Angeles

Comfort Women Not Sex Slaves but Prostitutes

Looking into Historical Evidence

- Neglected Facts and Voices -

Background of Comfort Women Issues

1. Historical Evidence
2. Origin and Development of Comfort Women Controversy
3. Political Implications

What is the controversy surrounding «Comfort Women»?

- Comfort Women are those who provided sexual services to Japanese Military during the WWII
- Point of contention:

Did JAPANESE GOVERNMENT FORCE these women into prostitution, or not?

Historical Evidence

- There are many «who said what», «who admitted what», various news reporting supporting contradictory views.
- **LET'S LOOK INTO PRIMARY SOURCES TO FIND OUT THE TRUTH**
 - Primary Sources : historical records
 - Secondary Sources: what other people heard about and wrote about (ex. recent newspaper articles, political statements, etc.)
- ***If Comfort Women were Sex Slaves orchestrated by Japanese government,***
 - = We should be able to find historical evidence!**

Historical Evidence 1: Tokyo War Trial, 1946

*In this trial, Japan was judged for its deeds
before and during the World War II*

Allied Powers tried Japan
for «Conventional
atrocities»
and «Crimes against
humanity».

Comfort Women
were not even
mentioned in the
trial

If Japanese Army did
indeed enslave Korean
women, why did NO
ONE talk about it?

CONCLUSION:

Comfort Women were not considered as crime or atrocity at that time

Historical Evidence 2: Mr Rhee Syngman

- First President of the Republic of Korea (ROK) after its independence in 1948
- Zealous anti-Japan independence fighter
- Demanded extensive reparations to Japan
- No mention of reparation for Comfort Women

CONCLUSION:

Comfort Women were not considered as an issue, even by the politician who is known as the most anti-Japan President of the ROK

Historical Evidence 3: JP-ROK Basic Treaty, 1965

- This treaty settled **ALL CLAIMS AND REPARATIONS** regarding any matters related to Japan's annexation of Korea, except for Takeshima.
- By signing this treaty, *ROK agreed to demand no further compensation, either at the government or individual level*, after receiving \$800 million (2.3 times Korea's national budget of that time) in grants and soft loans from Japan as compensation for its 1910–45 colonial rule in the treaty.
- According to the records of negotiation, Japan proposed to compensate individuals directly but Korean government of the time refused, and used most of the money for its economic development.
- **COMFORT WOMEN WAS NEVER BROUGHT UP AS A MATTER OF REPARATION AND COMPENSATION**

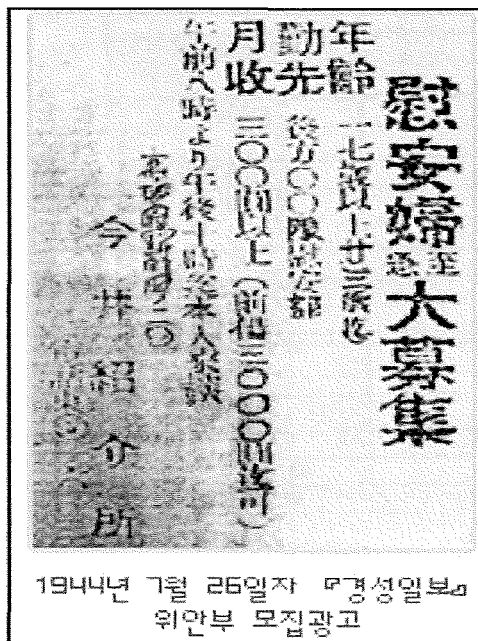
From the year the treaty was ratified, 1965, to 1982, no history-related anti-Japanese demonstration occurred, and the history was never brought up as political issue.

Historical Evidence 4: No Historical Documentation Backing Sex Slavery Found in Korea or in Japan

1. There is no documented evidence in Korea or Japan about how Japanese army rounded up the women in the form of diary, newspaper articles, etc. *Not even single one.*
2. And there is no trace of Korean people who fought against such slavery.

Historical Evidence 5: Copious numbers of Ads recruiting prostitutes found in Korea

- Several advertisements were found in Korean newspapers of the time, in which private middlemen recruited comfort women for Japanese Army, offering very high salary.



The exact wording of the advertisement : 京城日報 1944年7月26日広告
慰安婦至急大募集 (Comfort Women Urgently Wanted)

年齢 17歳以上23歳迄 (Age : between 17 and 23)

勤先 後方〇〇部隊慰安部 (Workstation :)

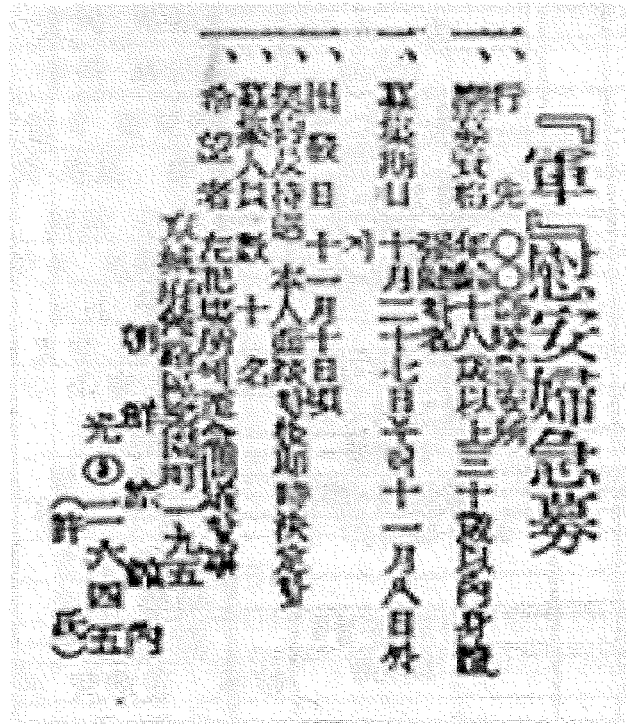
月収 300円以上 (前借3000円迄可) (Monthly Salary : at least 300 Yen. Advanced payment of up to 3000 Yen possible.)

午前8時より午後10時迄本人面談 (Interview between 8 AM and 10 PM)

京城*****20 (Address :)

今井紹介所 (Placement Agency Imai)

300 Yen of salary was three times that of the graduate of Keijyo Imperial University, the most prestigious university at that time – many women applied for the job – **NO NEED TO FORCE WOMEN IN PROSTITUTION**



1944년 10월 27일자 『매일신보』
위안부 모집광고

The exact wording of the advertisement : 朝鮮總督府機關紙
「毎日日報」1944年10月27日

『軍』慰安婦急募 (« Army » Comfort Women Urgently Wanted)

- 一、行 先 ○○部隊慰安所 (Workstation :)
 - 一、応募資格年齢十八歳以上三十歳以内 強健者 (Qualification Age : 18 to 30, in good health)
 - 一、募集期日十月二十七日～十一月八日迄 (Application accepted: 27 Oct. to 8 Nov.)
 - 一、出発日十一月十日頃 (Departure: around 10 Nov.)
 - 一、契約及び待遇本人面談後即時決定 (Decision on contract and working conditions immediately upon the interview)
 - 一、募集人員数十名 (Recruiting several dozens)
 - 一、希望者左記住所で至急相談 (For interested candidates, contact immediately the following)
- 京城府鐘路＊樂園町一九五
朝鮮旅館内
光＊二六四五 (許 氏)

Historical Evidence 6: US Army Report No. 49

- The US Office of War Interrogation (APO689 August 1944) report
 - Interviewed 20 Korean “comfort girls” captured around 10 August 1944 after the fall of Myitkyina in Burma.
 - States they were recruited by private agents with a promise of good income
 - Confirms that women lived a rather luxurious life.
 - They were allowed to refuse services for those soldiers whom the women did not welcome.
 - They were allowed to return home after paying off their debts.

Historical Evidence 7: Bank Statement of a Former Comfort Woman

Name: *Mun Okchu* 文 玉珠 (문옥주)

Mainichi Newspaper reported on May 12, 1992 that Japanese military post office savings records confirmed that former Korean comfort woman Mun Okchu, one of the plaintiffs for a law-suit against Japanese government, and who had been asking for return of her money, had deposited money 12 times from 1943 to 1945, when she was a comfort woman, with a balance of 26,145 yen.

Mun Okchu claims that she had been taken from Pusan to Rangoon together with about one hundred to one hundred-fifty young women, to work as a prostitute for Japanese soldiers, and had deposited the tips she had received in the post office account.

Note: Calculated at today's value, this amount is equivalent to about 80 million yen (\$762,000 at 105 yen/dollar) --- November 1999 Showa History Institute periodical.

The General of the Japanese Imperial Army earned 6,600 yen per year, so Mun Okchu's annual earnings was about twice that of the General's. A private 2nd class earned as little as 72 yen per year.

●原簿は預入を、赤字は払いもととし、また繰上は現在高を示す。

| 記号 | 氏名 | 年 | 月 | 日 | 種別 | 金 | 額 |
|----|-------|------|----|----|----|-----|------|
| 戦時 | 文原 玉珠 | 1943 | 6 | 10 | 新規 | 500 | 00 |
| 戦時 | 文原 玉珠 | 1943 | 7 | 10 | 繰上 | 200 | 00 |
| 戦時 | 文原 玉珠 | 1943 | 8 | 15 | 繰上 | 550 | 00 |
| 戦時 | 文原 玉珠 | 1943 | 9 | 18 | 繰上 | 200 | 00 |
| 戦時 | 文原 玉珠 | 1943 | 10 | 2 | 繰上 | 780 | 00 |
| 戦時 | 文原 玉珠 | 1943 | 11 | 6 | 繰上 | 820 | 00 |
| 戦時 | 文原 玉珠 | 1943 | 12 | 12 | 繰上 | 950 | 00 |
| 戦時 | 文原 玉珠 | 1944 | 1 | 16 | 繰上 | 850 | 00 |
| 戦時 | 文原 玉珠 | 1944 | 2 | 30 | 繰上 | 250 | 00 |
| 戦時 | 文原 玉珠 | 1944 | 3 | 12 | 繰上 | 120 | 00 |
| 戦時 | 文原 玉珠 | 1944 | 4 | 21 | 繰上 | 800 | 00 |
| 戦時 | 文原 玉珠 | 1944 | 5 | 26 | 繰上 | 500 | 00 |
| 戦時 | 文原 玉珠 | 1944 | 6 | 26 | 繰上 | 500 | 00 |
| 戦時 | 文原 玉珠 | 1944 | 7 | 27 | 繰上 | 100 | 00 |
| 戦時 | 文原 玉珠 | 1944 | 8 | 27 | 繰上 | 640 | 00 |
| 戦時 | 文原 玉珠 | 1944 | 9 | 27 | 繰上 | 680 | 00 |
| 戦時 | 文原 玉珠 | 1944 | 10 | 27 | 繰上 | 720 | 00 |
| 戦時 | 文原 玉珠 | 1944 | 11 | 27 | 繰上 | 750 | 00 |
| 戦時 | 文原 玉珠 | 1944 | 12 | 27 | 繰上 | 800 | 00 |
| 戦時 | 文原 玉珠 | 1945 | 1 | 27 | 繰上 | 820 | 00 |
| 戦時 | 文原 玉珠 | 1945 | 2 | 27 | 繰上 | 820 | 00 |
| 戦時 | 文原 玉珠 | 1945 | 3 | 27 | 繰上 | 820 | 00 |
| 戦時 | 文原 玉珠 | 1945 | 4 | 27 | 繰上 | 820 | 00 |
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Historical Evidence 8: Korean Men Volunteered to Join the Japanese Army

- Documented evidence about Korean men volunteered for Japanese Army.
 - Korean men volunteered to join the Japanese army.
 - Japanese army was so popular that it was very competitive to get in (less than 10% acceptance rate).
 - There were Korean generals and officers in Japanese Army.

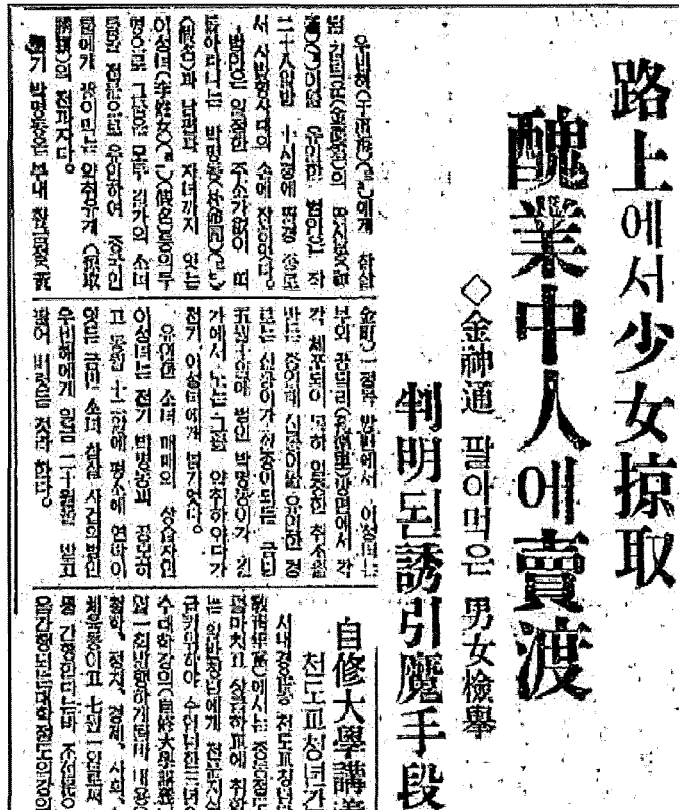
If Japanese Army did enslave Korean women, would Korean men have volunteered to join the Japanese Army?

Mr Park Chung-hee, current President's father, was elected Korean President after serving in Japanese Army. Would Korean people have elected an ex-Japanese Army Officer to Korean Presidency if Japanese Army had enslaved Korean women?

Historical Evidence 9: Japanese Official Documentation Prohibits Forceful Recruitment

- **Army Memorandum 2197, issued on March 4, 1938**, explicitly prohibits recruiting methods that fraudulently employ in the army's name or that can be classified as abduction, warning that those employing such methods would be punished.
- **A Home Affairs Ministry Directive (number 77) issued on February 18, 1938**, states that the recruitment of "comfort women" must be in compliance with international law and prohibits the enslavement or abduction of women.
- **A Directive (number 136) issued on November 8, 1938**, moreover, orders that only women who are 21 years old or over and are already professionally engaged in the trade may be recruited as "comfort women." It also requires the approval of the woman's family or relatives.

Historical Evidence 10: Japanese Police Arresting Human Trafficking in Korea



“Abducting a Girl – Selling her to Chinese Prostitution”

an article by Donga Daily, a major Korean newspaper, reported on 30 June 1933 an arrest by the police (under the authority of Japanese government-general of Korea) of a Korean human trafficking organization on 18 June, which was about to sell a girl to a Chinese brothel, and it notes that Japanese authority has increased police force in order to crack down on human trafficking.

「路上で少女略取。醜業中国人に売り渡し 金神通を売った男女 檢舉 判明した誘拐魔の手段」東亜日報1933年6月30日付

On May 5 1933, Donga Daily reports the arrest by the police under Japanese authority of a Korean prostitute who bought a girl of underage at 350 yen and attempted to falsify her age to the legal age for prostitution using her brothers' family register. The newspaper reports that the perpetrator committed the same crime with other underage girls.

「民籍を偽造 醜業を強制 悪魔のような遊郭業者の所業 犯人逮捕へ」 東亜日報1933年5月5日

民籍을 偽造

醜業을 強制

악마같은 유곽업자의 소행

犯人은 警察에 被逮

시내 서사현정(西四軒町)에 一
七八번지 오(吳)씨(吳)씨이라
는 자는 한남(韓南)이라, 상
호를 가지고 창기(娼妓)를 하는 중
지(池)를 일(一)정(正)정(正)이라(山)이라
에서 박(朴)씨(朴)씨이라든 十六
세 된 처녀를 三백五十원에 사다가

연정이 부속하여 연정을 할 수
있음으로 박(朴)씨의 형제인 박순
남(朴順南)의 민(民)籍을 偽造하여 다
가 연정을 하게 되어 불려만다

惡德紹介業者가跋扈

農村婦女子를誘拐

被害女性이百名을突破한다

釜山刑事奉天에急行

【釜山 31日電】惡德紹介業者가跋扈하고農村婦女子를誘拐하여被害女性이百名을突破한다. 釜山刑事은此等의惡德紹介業者를根絶하기爲에釜山에서부터奉天까지急行하여追跡中이다. 此等의惡德紹介業者는주로釜山의農村地區에서活動하며, 農村婦女子를誘拐하여日本이나韓國의都市로賣出し, 巨額의利益을擧げて來てゐる。 釜山刑事은此等의惡德紹介業者를根絶하기爲에釜山에서부터奉天까지急行하여追跡中이다. 此等의惡德紹介業者는주로釜山의農村地區에서活動하며, 農村婦女子를誘拐하여日本이나韓國의都市로賣出し, 巨額の利益を擧げて來てゐる。

慶北初等敎員에게

1. 慶北初等敎員에게
2. 慶北初等敎員에게
3. 慶北初等敎員에게

Similarly, the police in Pusan under Japanese authority rescued over 100 victims who were abducted from farming villages by Korean human traffickers in 1939. Donga Daily reports "Corrupt Placement Agencies Rampant - Abducting Women and Girls in Farming Villages - Victims over 100." This article reports Korean traffickers selling both Korean and Japanese women and girls. Donga Daily, 31 August 1939.

「惡德紹介業者が跋扈。農村婦女子を誘拐。被害女性が100名を突破する～釜山の刑事。奉天へ急行」東亞日報1939年8月31日

Donga Daily, 9 March 1939. "Numerous Enticement Cases – Brothel Dealers Abduct and Sell Women and Girls." The article states the police suspended brothel operations on the suspicion of human trafficking.

誘引事件多端

警察營業停止라도인킬方針

매하야 그들의 순행은 미연에 방지
케 하였는 수고를 하였었다 한다。
이로써 미아마 경찰의 호의로 그
라를 구출하였는 계기는 탐고의
기색이 없게 그를 업자로는 경찰
에서의 호응이 잇지 끝 지방으로
금방 발령하였는데 이말은 이미

路上飮毒

Donga Daily, 15 March 1939 reports the police under Japanese authority formed a special investigation team to enquire into a recruitment agency linked to a brothel operator selling girls abroad.

「河允明誘惑事件波紋拡大 悪辣な遊郭業者 警察の救出を念慮 続々海外に転売 人事紹介所に検察のメス 特別調査隊編成内探」東亞日報 1939年3月15日

河允明誘拐事件波紋擴大

惡辣한遊廓業者

警察의 救出을 念慮

續々外國으로 轉賣

人事紹介所に

檢察의 메스!

特別調査隊編成内探

清水公大編輯

Historical Evidence 11: Korean People had voting right and the right of representation in Japanese Diet

1. When Korea was annexed to Japan, Korean people had a voting right and the right of representation in Japanese Diet. They were legally Japanese citizens.

Very unlikely that the democratically elected Japanese government would have a policy of enslaving part of its voters as sex slaves.

2. In Korean Peninsula during Japanese rule, historical records indicate that approximately 80% of the local parliamentarians were Koreans, and many Koreans occupied high ranking positions in public institutions and the police. It is technically not feasible to carry out forced mobilization of Korean women.

3. Korean women were not coerced by Japanese military because the Korean Peninsula was not the battlefield and therefore Japanese military was NOT in Korea.

Historical Evidence 12: Japanese Authority prohibited the forced prostitution

- 1944, a group of Dutch women was forced into sexual servitude by 11 Japanese military personnel in Sumalan, Indonesia.
- The Japanese military authority explicitly ordered to hire comfort women only upon their consent; these officers ignored the order.
- When a father of one of the Dutch women reported the incidence to the Japanese military authority, his plea was immediately accepted and the comfort station in question was ordered to close. This comfort station was in operation for two months in total.
- The perpetrators were all judged and found guilty.
- *An example of Japanese Authority prohibiting sex slavery*

Historical Evidence 13: No Slavery in Japanese History

- In Japan's 2600 years of history, slavery never existed.
- It is not in the mentality of Japanese to enslave people.
- Suddenly do they decide to enslave women?
Documented evidence from WWII indicates contrary.

Interagency Work Group Report of 2007

Investigated Nazi War Crimes & Japanese Imperial Government Records

8 years of extensive study (1999-2007)

Covered 8 million pages of classified US official documents and spent USD 30 million

Published in April 2007 and reported to the US Congress

Studied by: Department of the State, the Secretary of Defense, the Attorney General, Director of the CIA, Director of the FBI, National Security Council, Director of the U.S. Holocaust Memorial Museum

- Objective was to uncover Japan's war crimes in Asia during the WWII
- In the extensive search of classified US official documents, no documented evidence of sex slavery by Japan was found.
- The report is available online

Interagency Work Group Report of 2007

«Among the disappointed (of the result of this study) will be those who had hoped for a voluminous release of U.S. records relating to Japanese war crimes..... Many people around the world had hoped that the IWG would unearth records that would help them document Japanese atrocities. To these people, I state unequivocally that the IWG was diligent and thorough in its search for relevant records about war crimes in Asia. The IWG uncovered and released few Asian theatre records because few such U.S. records remained classified. Unclassified records were not under IWG jurisdiction.»

Steven Garfinkel, Acting Chair, January 2001-September 2006

Washington, April 2007

Testimonies of Former Comfort Women

Report “Testimonies of Forcefully Mobilized Korean Comfort Women”, published in February 1993, by "Korean Council for the Women Drafted for Military Sexual Slavery by Japan" or "**Chong Dae Hyup**" (Anti-Japanese Lobby).

Dr. An Byong-jik, then a Seoul University professor of Korean History (now professor Emeritus) and the head of this study group testified that they interviewed 40 ex-comfort women and only 19 testimonies were considered reliable. He commented in the report that some testimonies seem to be “deliberately distorting the facts”. The 19 testimonies were published in the report.

- Only four ex-comfort women claimed that they were forcefully taken away. One claimed to have worked in Pusan, Korea, and another in Toyama Prefecture, Japan; however, there was no comfort station there as they were not a battlefield.

Testimonies of Former Comfort Women

- This report of ex-comfort women's testimonies were handed by the Korean Ministry of Foreign Affairs to the Japanese counterpart.

The most official report of Korea on ex-comfort women's testimonies is proven to have few reliable testimonies of forced mobilization.

Dr. An Byong-jik, having witnessed the fabrication of stories by "**Korean Council for the Women Drafted for Military Sexual Slavery by Japan**" or **Chong Dae Hyup (Anti-Japanese lobby)**, he discontinued his cooperation with the association.

Professor Ahn Byong Jik of Seoul University had discovered in 2013 a diary written by a Korean comfort station manager. Professor An Byong-Jik confirms that **Korean comfort women were recruited by Korean prostitution brokers, not by Japanese military.**

Several people had witnessed the scenes in which **Chong Dae Hyup** (anti-Japan lobby) coached former comfort women to say "I was abducted by Japanese military." (*The Comfort Women*, Chunghee Sarah Soh, Univ. of Chicago Press, 2008.)

- Professor An Byong-Jik of Seoul University who interviewed former Korean comfort women says, "When I first interviewed them, none of them had anything bad to say about Japanese military. In fact they all reminisced the good times they had with Japanese soldiers. But after **Chong Dae Hyup or "Korean Council for the Women Drafted for Military Sexual Slavery by Japan"** confined them, their testimonies had completely changed." (*The Comfort Women*, Chunghee Sarah Soh, 2008.)

What is *Chong Dae Hyup* (anti-Japan lobby) ?

- Members include North Korean spies (see the next slide)
- Considered by many in South Korea that *Chong Dae Hyup* is a North Korean Propaganda machine which tries to discredit Japan and prevents Japan-South Korea reconciliation, **thus weakening the military cooperation between South Korea, Japan and the US.**
- Initiator of Comfort Women statues in the US, which create fissures between Japan and the US, **thus weakens the US-Japan Security Alliance.**



The Link between **Chong Dae Hyup** or "**Korean Council for the Women Drafted for Military Sexual Slavery by Japan**" and the North Korean spies and the creators of comfort women memorials.

- Yun Mihyang is the Chair Woman of Chong Dae Hyup, who is known to have North Korea connection.
- Building of Comfort Women statues is backed by Chong Dae Hyup.
- Members include several N. Korean spies.

Reference for Further Readings

- Books are written by Korean academics on Comfort Women
- ***Comfort Women of the Empire***, by Park Yuha, Professor, Yonsei University, 2014, in Japanese.
- ***The Comfort Women***, by C. Sarah Soh, University of Chicago Press, 2008.

PART II:

How Did Comfort Women Controversy Started?

CHRONOLOGY OF EVENTS

1983 a book “*My War Crimes: Abduction of Korean Women*”, by *Seiji Yoshida*, claiming he was a team leader of a Japanese military group which rounded up many Korean girls in Cheju Island to send them to comfort stations.

- Yoshida claimed it to be a true story but later disproved and discredited as a fiction

• **August 11, 1991, Asahi Newspaper** revealed a Korean ex-comfort woman, Kim Hak-sun, **misreporting** that she testified that she was removed from her home and forced to join the «Women's Volunteer Corps». **(First coming-out of an ex-comfort woman)**

- However, in her petition to Japan, she clearly stated that she was sold by her mother for 40 yen to a Kisaeng school (for prostitutes) in Korea and later taken by her father-in-law to a comfort station in China.
- «Women's Volunteer Corps» is a group of women who had been called to work at war-related factories. Not related to comfort women. But Asahi described it as if this is a group of comfort women.

FIRST INCIDENT OF DELIBERATE FABRICATION OF COMFORT WOMEN ISSUE

- **August 14, 1989**, Cheju Island News reported that after its interviews with locals, the story of **Yoshida** was **proved to be completely groundless** as no locals witnessed such forced mobilisation by Japanese Army.
 - But this report was largely ignored by the public.

- **January 11, 1992**, Asahi Newspaper reported : «an evidence of Japanese military involvement in the management of comfort stations was discovered»
 - The article stated: Professor Yoshiaki YOSHIMI of Chuo University found a document issued by the Ministry of Army, regarding the recruitment of comfort women.
 - The details of the order was not disclosed in the article.
 - Yoshimi called for «Official apology and reparation» to Japanese government.
 - Asahi reported of «forceful mobilization of Korean women, which counts between 80,000 to 200,000.»
 - Other researchers discovered : this was an order to enforce more rigorous selection procedure of private agencies recruiting comfort women, on the ground that some agencies have been recruiting women bordering on kidnapping. The order states «the Japanese military's honor is at stake.»
 - **This documentation indicates Japan's policy of prohibiting forceful recruitment of comfort women.**
 - **HOWEVER, THE PUBLIC BELIEVED ASAHI'S CLAIM BECAUSE THE DISPROVAL CAME MUCH LATER**

- **January 13, 1992** – Then the Chief Cabinet Secretary, Mr Kouichi KATO, officially apologized to Korea *without corroborating the claim of Professor YOSHIMI of before-mentioned Asahi Article.*

(Asahi published the article just before Jp Prime Minister's visit to Korea, thus not giving time to Japan for investigation.)

- **January 17, 1992** – then the Prime Minister Kiichi MIYAZAWA visited South Korea and made 8 official apologies.
- **January 23, 1992** – Asahi reports YOSHIDA's claim «at least 950 women forcefully recruited»
- **February 17, 1992** – Japan Federation of Bar Association brings up the comfort women issue to the UN Human Rights Committee and ask for the UN intervention.
- **May 25, 1992** – Asahi reported that YOSHIDA would start «a journey of apology» to Korea – meaning apologies in front of Korean public

- **May 1992** – Professor Ikuhiko HATA, Chiba University, publish his research findings in Cheju Island and disproved YOSHIDA's testimony.
- **July 6, 1992** – Based on Professor HATA's findings, Japanese government conducts research on Japan's involvement in comfort women.
 - Chief Cabinet Secretary KATO, who previously apologized to Korea, confirmed «No evidence was found on forceful recruitment of women», «but military involvement in the management and supervision of comfort stations».
 - Discloses more than 100 official documents
- **August 12, 1992** – YOSHIDA visits Korea and apologize in front of Ms. Kim, the ex-comfort woman, who made the first coming-out.
- **December 25, 1992** – 10 ex-comfort women from Busan sue Japan
- **April 2, 1993** – 46 ex-comfort women from the Philippines sue Japan
- **April 5, 1993** - Song Sin-do, a Korean ex-comfort woman sue Japan

- **August 4, 1993 – KONO Statement** : then the Chief Cabinet Secretary Mr KONO officially recognizes Japanese Army's involvement in forced mobilization of comfort women.
 - The basis of this statement is the testimonies of 16 ex-comfort women, who were selected by Korean government.
 - Their testimonies were not disclosed to the public.
 - No counter-interrogation by Japanese government to these former comfort women were accepted by Korean government.
- **July 19, 1995** – Japan establishes Asian Women's Fund to provide reparations to ex-comfort women

April 19, 1996: Coomaraswamy Report

- UN Human Rights Commission publishes «Coomaraswamy Report», and defines comfort women as «sex slaves», and declares it is the violation of human rights.
- **Basis of Her Argument:**
 - Testimonies of former comfort women (Several former comfort women confessed they told a lie to Special Rapporteur, Ms. Coomaraswamy, that they were abducted by Japanese Army. List of confessions available at: Professor Chunghee Sarah Soh's book, *The Comfort Women*.)
 - Yoshida Seiji's testimony (Later proven to be a fiction)

- **May 3, 1994** – Minister of , Mr Shigeto NAGATO, declares «comfort women are prostitutes». Upon severe criticisms from Asian nations, he resigns 4 days later.
- **August 31, 1994** – then the Prime Minister Tomiichi MURAYAMA makes a public apology regarding comfort women issue
- **January 24, 1995** - Japan Federation of Bar Association makes a recommendation to Japanese government to compensate former comfort women individually
- **May 2 and 9, 1996** - Magazine *Shukan Shincho* publishes its interview with YOSHIDA, in which he admits part of his testimony was a fabrication, especially the «place where he hunted comfort women» (Cheju island : no locals new of the incident)

- **March 9, 1997 - Former Deputy Chief Cabinet Secretary, Mr Nobuo ISHIHARA, who was involved in drafting KONO Statement, revealed**
 - The statement was based mostly on the testimonies of former comfort women. But the authenticity of their testimonies was never verified.
 - There is a likelihood that the language of Kono Statement was coordinated with the Republic of Korea.
 - Political Compromise: He testified that Korea promised not to raise this issue again if Japan publicly declares the existence of forceful recruitment of comfort women, and that the Japanese Military was involved in this matter. And Japan accepted Korea's demand in the hope that this issue will be settled after the Kono Statement.

- **June 17, 1997** – former Chief Cabinet Secretary Mr KONO «no documentation testifying force mobilization of comfort women was found, but that does not mean there was no forced mobilization.»
- **August 1998** - McDougall Report supporting the Coomaraswamy Report was ratified in the Committee On The Elimination Of Discrimination Against Women (CEDAW), Office of the High Commissioner for Human Rights
- **August 1998** - Comfort Women Museum opens in Korea
- **October 1998** – Professor Ikuo HATA testifies that YOSHIDA admitted in their private conversation his work was a fiction, published in magazine «Shokun!», November edition.

- **30 July 2007 - US House of Representatives passed House Resolution 121, which asks Japan to apologize to former comfort women and state the issue in Japan's history textbooks.**
- Initiated by Mr Mike HONDA, who cites as evidence
 - YOSHIDA's testimony, (Disproved)
 - Asian Women Fund, (Political gesture, not historical evidence)
 - Prime Ministers apologies, (Political gesture, not historical evidence)
 - KONO Statement (Later recognized to be a political compromise with Korea rather than a finding based on objective analysis)(Source: Feb. 25, 2007, *Reportage 2001*, 『報道2001』, a Japanese TV program.)
- Mr Mike HONDA has been financed by and collaborate *with the Global Alliance for Preserving the History of WWII*, an anti-Japanese organization linked to the Chinese communist government

- **June 20, 2014** – Japanese government publishes *Background Review of the process in the announcement of KONO Statement*

The review unveiled

1. Exchange of views between Japan and ROK took place concerning preparation of the Kono Statement
2. The ROK repeatedly demanded inclusion of falsified verbiage implying direct involvement of the Japanese government regarding the comfort women recruitment. Such demands were rejected by the Japanese government, but allowed phrases which may be interpreted as its involvement.
3. **The Statement was fully drafted prior to hearings** from the Korean former comfort women of how they were recruited, and treatments received while providing their services.

- **August 5, 2014 – Asahi Newspaper published an official recognition that its articles relative to the testimony of Seiji YOSHIDA regarding «hunting of comfort women» were false, and announced its decision to withdraw these articles published between 1980s to 1990s.**
- **25,768 Plaintiffs sued Asahi Newspaper for the defamation of Japan in March 25, 2015.** *(Asahi is a left-wing Japanese newspaper recruiting journalists from China and Korea every year.)*

PART III:

Comfort Women a Human Rights Issue?

Not likely – It is a POLITICAL ISSUE

Korea brings up only Japanese comfort women issue to the UN Human Rights Committee but keeps silence to its own forced prostitution and rapes, massacres which have abundant historical records.

CASE 1: Records indicate Korean government forced its own women to sexual servitude for the US military during the Korean War, which developed into law-suit in Korea. The plaintiffs show various records of forced servitude by the Korean government.

CASE 2: Abundant evidence indicates that Korean troops massacred and raped local women during Viet Nam War. **Lai Đại Hàn**, children born from these rapes are a serious issue that has not been resolved to date. No official compensation nor apology from Korea so far. No such children were born between Japanese Army and other nationals.

Geopolitical Context

EFFECTS OF COMFORT WOMEN ISSUE IN THE WORLD

- **Building of comfort women statues in the US, Canada, Australia, etc.** (Countries with which Japan is strengthening its security cooperation)

-> Anti-Japanese movements in the countries which have security cooperation with Japan.

- **US-Japan Security Treaty weakens**
- Japan Bashing increases in various countries
- Japan's isolation in the international community

-> **Who profits from this situation? Answer: CHINA.**

It proposed to form an anti-Japanese coalition between Russia, China, Korea and the United States. (Proof in the next slide.)

China's Grand Strategy Announced in Moscow

At the trilateral security conference between Russia, China and Korea in Moscow in 2012, Guo Syangan, vice-president of the Chinese Institute of International Affairs of the Chinese Ministry of Foreign Affairs announced:

The Voice of Russia (Russian national radio) reports:

“By consciously escalating the territorial disputes with its neighbors Japan showed that it does not recognize the results of World War II, stressed Guo Syangan. ... In his opinion, this is the reason why Japan must give up its claims not only for the South Kuril Islands, Dokdo (Takeshima) and Senkaku (Diaoyu) Islands, but also for Okinawa. Guo Syangan suggested forming a united anti-Japanese front that would include China, Russia and South Korea. The USA should also be included in the front in order to force Japan to recognize the results of World War II and give up its territorial claims to its neighbors.”

Ivanova, Irina. “China proposes a united anti-Japanese front.” The Voice of Russia, 15 Nov. 2012. Web.

In summary....

- China proposing an «anti-Japan» front to Russia, the US and South Korea.
- Mastermind in this story is China.
- Comfort Women issues, largely instigated by communists in North Korea, South Korea and Japan, aim to label Japan as «a country unwilling to admit its atrocities of WWII». When Japan refutes the sex slave theory, they label Japan as «growing nationalist» and «revisionist, imperialist», thus creating a fissure between Japan and the US, and with the rest of the world.

➡ Weakening Japan-US security alliance and isolate Japan in the international community.

➡ **Japan, without US military assistance, will not be able to defend Senkaku and Okinawa from China.**

➡ **China claiming these two territories as its own.**

Why does China want Senkaku & Okinawa?

Senkaku

- Located in midway between Taiwan and Japan. Important stronghold when defending Taiwan. If China controls Senkaku, the US cannot effectively send military forces to Taiwan.

Taiwan

- Taiwan, without US military protection, falls in the hand of China
- Situated at the crossing of East China Sea and South China Sea
- Control of Taiwan gives free hand over the critically important military / sea lane connecting these two seas
- Controlling Taiwan gives the control of the East and South China Seas and the access to the Pacific Ocean, effectively breaking the containment line of Japan-Taiwan-the Philippines. Easy to attack Japan and the Philippines from Taiwan.
- Japan, having its life-line sea lane dominated by China, will kneel down to China and becomes China's puppet

Okinawa

- One major access route to the Pacific Ocean is sailing between Okinawa and Miyako Island
- 74% of US force in Japan is based in Okinawa and ensures the security of East and South China Seas
- Half of the US power projection in the world comes from Okinawa. Eliminating US presence in Okinawa means break-down of US hegemony

East Asia Hegemony

- **Eliminating US military presence from East Asia by dominating Okinawa and Senkaku**
- **China gains Hegemony of East Asia**

Manipulating History

- China's intent: framing Senkaku and Okinawa as its own territories being dominated by Japan illegally since the WWII (*fabrication – Japan is the righteous owner of these islands*), and portrays Japan's rule of these islands as a proof that Japan is acting like imperialist from the WWII era, thus putting pressure on Japan to give up these islands – a case of manipulation of history. Comfort women issue is one of the tools to this end.
- Why use historical issues? – because the US cannot side with Japan regarding the WWII. (If sided with Japan, the US cannot justify dropping two atomic bombs and massacring over 100,000 civilians in Tokyo.) China's aim is to alienate the US from Japan.

CONCLUSION

Comfort Women Issue

- Tool to defame Japan
- Isolate Japan internationally and alienate the US from Japan
- US-Japan Security Alliance nullified

China takes Okinawa and Senkaku

- Without US assistance, Japan cannot defend its territories against China
- Without US military support, much easier to take these strategically important islands from Japan

China establishes East Asia Hegemony

- Without Okinawa and Senkaku, the US cannot ensure its dominance of East Asia
- Effectively eliminating the US military presence from East Asia and establishing Chinese Hegemony in the region

ANNEXES

1. US Army Report No 49 (original and transcribed versions)
2. English Translation of Comfort Women Articles by Korean Scholars
October 26, 2014

National Archives at College Park

8601 Adelphi Road
College Park, MD 20740-6001

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Tony Marano
[REDACTED] TX
[REDACTED]



July 11, 2013

Tony Marano
[REDACTED] TX
[REDACTED]

Dear Mr. Marano:

This letter is in reply to your recent request to the National Archives for a copy of Japanese Prisoner of War Interrogation Report No. 49, which you saw posted on the Internet.

Per your request, we have enclosed a copy of the report, free-of-charge. It comes from Record Group 208 *Records of the Office of War Information*.

Sincerely,

[REDACTED]
Archives II Reference Section [REDACTED]
National Archives at College Park, MD
[REDACTED]

Classified: *3M/K*

UNITED STATES OFFICE OF WAR INFORMATION
Psychological Warfare Team
Attached to U.S. Army Forces India-Burma Theater.
APO 689

| | | |
|---|---|--|
| Japanese Prisoner of War Interrogation Report No. 49. | Place interrogated: Date interrogated: Date of Report: By: | Lodo Stockade Aug. 20 - Sept. 10, 1944 October 1, 1944 T/S Alex Vorichi |
|---|---|--|

| | |
|---------------------------------|-------------------------|
| Prisoners: | 20 Korean Comfort Girls |
| Date of Capture: | August 10, 1944 |
| Date of Arrival at Stockade: | August 15, 1944 |

SECRET

PREFACE:

This report is based on the information obtained from the interrogation of twenty Korean "comfort girls" and two Japanese civilians captured around the tenth of August, 1944 in the mopping up operations after the fall of Myitkyina in Burma.

The report shows how the Japanese recruited these Korean "comfort girls", the conditions under which they lived and worked, their relations with and reaction to the Japanese soldier, and their understanding of the military situation.

A "comfort girl" is nothing more than a prostitute or "professional camp follower" attached to the Japanese Army for the benefit of the soldiers. The word "comfort girl" is peculiar to the Japanese. Other reports show the "comfort girls" have been found wherever it was necessary for the Japanese Army to fight. This report however deals only with the Korean "comfort girls" recruited by the Japanese and attached to their Army in Burma. The Japanese are reported to have shipped some 703 of these girls to Burma in 1942.

RECRUITING:

Early in May of 1942 Japanese agents arrived in Korea for the purpose of enlisting Korean girls for "comfort service" in newly conquered Japanese territories in Southeast Asia. The nature of this "service" was not specified but it was assumed to be work connected with visiting the wounded in hospitals, rolling bandages, and generally making the soldiers happy. The inducement used by these agents was plenty of money, an opportunity to pay off the family debts, easy work, and the prospect of a new life in a new land - Singapore. On the basis of these false representations many girls enlisted for overseas duty and were rewarded with an advance of a few hundred yen.

The majority of the girls were ignorant and uneducated, although a few had been connected with "oldest profession on earth" before. The contract they signed bound them to Army regulations and to work for the "house master" for a period of from six months to a year depending on the family debt for which they were advanced.

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JCS DECLASSIFICATION PROGRAM

DATE: *1973*

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Approximately 800 of these girls were recruited in this manner and they landed with their Japanese "house master" at Rangoon around August 20th, 1942. They came in groups of from eight to twenty-two. From here they were distributed to various parts of Burma, usually to fair sized towns near Japanese Army camps. Eventually four of these units reached the Myitkyina vicinity. They were: Kyoei, Kinsui, Bakushinro, and Momoya. The Kyoei house was called the "Maruyama Club", but was changed when the girls reached Myitkyina as Col. Maruyama, commander of the garrison at Myitkyina, objected to the similarity to his name.

PERSONALITY:

The interrogations show the average Korean "comfort girl" to be about twenty five years old, uneducated, childish, whimsical, and selfish. She is not pretty either by Japanese or Caucasian standards. She is inclined to be egotistical and likes to talk about herself. Her attitude in front of strangers is quiet and demure, but she "knows the wiles of a woman." She claims to dislike her "profession" and would rather not talk either about it or her family. Because of the kind treatment she received as a prisoner from American soldiers at Myitkyina and Ledo, she feels that they are more emotional than Japanese soldiers. She is afraid of Chinese and Indian troops.

LIVING AND WORKING CONDITIONS:

In Myitkyina the girls were usually quartered in a large two story house (usually a school building) with a separate room for each girl. There each girl lived, slept, and transacted business. In Myitkyina their food was prepared by and purchased from the "house master" as they received no regular ration from the Japanese Army. They lived in near-luxury in Burma in comparison to other places. This was especially true of their second year in Burma. They lived well because their food and material was not heavily rationed and they had plenty of money with which to purchase desired articles. They were able to buy cloth, shoes, cigarettes, and cosmetics to supplement the many gifts given to them by soldiers who had received "comfort bags" from home.

While in Burma they amused themselves by participating in sports events with both officers and men, and attended picnics, entertainments, and social dinners. They had a phonograph, and in the towns they were allowed to go shopping.

PRICE SYSTEM:

The conditions under which they transacted business were regulated by the Army, and in congested areas regulations were strictly enforced. The Army found it necessary in congested areas to install a system of prices, priorities, and schedules for the various units operating in a particular area. According to interrogations the average system was as follows:

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|-------------|---------------|----------|------------------|
| 1. Soldiers | 10 AM to 5 PM | 1.50 yen | 20 to 30 minutes |
| 2. NCOs | 5 PM to 9 PM | 3.00 yen | 30 to 40 minutes |
| 3. Officers | 9 PM to 12 PM | 5.00 yen | 30 to 40 minutes |

These were average prices in Central Burma. Officers were allowed to stay overnight for twenty yen. In Myitkyina Col. Maruyama slashed the prices to almost one-half of the average price.

SCHEDULES:

The soldiers often complained about congestion in the houses. On many occasions they were not served and had to leave as the army was very strict about overstaying leave. In order to overcome this problem the Army set aside certain days for certain units. Usually two men from the unit for the day were stationed at the house to identify soldiers. A roving MP was also on hand to keep order. Following is the schedule used by the "Kyoei" house for the various units of the 18th Division while at Maymyo:

| | | |
|-----------|-------|-----------------------------------|
| Sunday | ----- | 18th Div. Hdqs. Staff |
| Monday | ----- | Cavalry |
| Tuesday | ----- | Engineers |
| Wednesday | ----- | Day off and weekly physical exam. |
| Thursday | ----- | Medics |
| Friday | ----- | Mountain artillery |
| Saturday | ----- | Transport |

Officers were allowed to come seven nights a week. The girls complained that even with the schedule congestion was so great that they could not care for all guests, thus causing ill feeling among many of the soldiers.

Soldiers would come to the house, pay the price and get tickets of cardboard about two inches square with the price on the left side and the name of the house on the other side. Each soldier's identity or rank was then established after which he "took his turn in line". The girls were allowed the prerogative of refusing a customer. This was often done if the person were too drunk.

PAY AND LIVING CONDITIONS:

The "house master" received fifty to sixty per cent of the girls' gross earnings depending on how much of a debt each girl had incurred when she signed her contract. This meant that in an average month a girl would gross about fifteen hundred yen. She turned over seven hundred and fifty to the "master". Many "masters" made life very difficult for the girls by charging them high prices for food and other articles.

In the latter part of 1943 the Army issued orders that certain girls who had paid their debt could return home. Some of the girls were thus allowed to return to Korea.

The interrogations further show that the health of these girls was good. They were well supplied with all types of contraceptives, and often soldiers would bring their own which

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had been supplied by the army. They were well trained in looking after both themselves and customers in the matter of hygiene. A regular Japanese Army doctor visited the houses once a week and any girl found diseased was given treatment, secluded, and eventually sent to a hospital. This same procedure was carried on within the ranks of the Army itself, but it is interesting to note that a soldier did not lose pay during the period he was confined.

REACTIONS TO JAPANESE SOLDIERS:

In their relations with the Japanese officers and men only two names of any consequence came out of interrogations. They were those of Col. Maruyama, commander of the garrison at Myitkyina, and Maj. Gen. Mizukami, who brought in reinforcements. The two were exact opposites. The former was hard, selfish and repulsive with no consideration for his men; the latter a good, kind man and a fine soldier, with the utmost consideration for those who worked under him. The Colonel was a constant habitue of the houses while the General was never known to have visited them. With the fall of Myitkyina, Col. Maruyama supposedly deserted while Gen. Mizukami committed suicide because he could not evacuate the men.

SOLDIERS' REACTIONS:

The average Japanese soldier is embarrassed about being seen in a "comfort house" according to one of the girls who said, "when the place is packed he is apt to be ashamed if he has to wait in line for his turn". However there were numerous instances of proposals of marriage and in certain cases marriages actually took place.

All the girls agreed that the worst officers and men who came to see them were those who were drunk and leaving for the front the following day. But all likewise agreed that even though very drunk the Japanese soldier never discussed military matters or secrets with them. Though the girls might start the conversation about some military matter the officer or enlisted man would not talk, but would in fact "scold us for discussing such unlady like subjects. Even Col. Maruyama when drunk would never discuss such matters."

The soldiers would often express how much they enjoyed receiving magazines, letters and newspapers from home. They also mentioned the receipt of "comfort bags" filled with canned goods, magazines, soap, handkerchiefs, toothbrush, miniature doll, lipstick, and wooden clogs. The lipstick and clogs were definitely feminine and the girls couldn't understand why the people at home were sending such articles. They speculated that the sender could only have had themselves or the "native girls" in mind.

REACTION TO THE MILITARY SITUATION:

It appears that they knew very little about the military situation around Myitkyina even up to and including the time of

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their retreat and capture. There is however some information worth noting:

* "In the initial attack on Myitkyina and the air strip about two hundred Japanese died in battle, leaving about two hundred to defend the town. Ammunition was very low.

"Col. Maruyama dispersed his men. During the following days the enemy were shooting haphazardly everywhere. It was a waste since they didn't seem to aim at any particular thing. The Japanese soldiers on the other hand had orders to fire one shot at a time and only when they were sure of a hit."

Before the enemy attacked on the west air strip, soldiers stationed around Myitkyina were dispatched elsewhere to stem the Allied attack in the North and West. About four hundred men were left behind, largely from the 114th Regiment. Evidently Col. Maruyama did not expect the town to be attacked. Later Maj. Gen. Mizukami of the 56th Division brought in reinforcements of more than two regiments but these were unable to hold the town.

It was the consensus among the girls that Allied bombings were intense and frightening and because of them they spent most of their last days in foxholes. One or two even carried on work there. The comfort houses were bombed and several of the girls were wounded and killed.

RETREAT AND CAPTURE,

The story of the retreat and final capture of the "comfort girls" is somewhat vague and confused in their own minds. From various reports it appears that the following occurred: on the night of July 31st a party of sixty three people including the "comfort girls" of three houses (Balashinro was merged with Kinsui), families, and helpers, started across the Irrawaddy River in small boats. They eventually landed somewhere near Waingmaw. They stayed there until August 4th, but never entered Waingmaw. From there they followed in the path of a group of soldiers until August 7th when there was a skirmish with the enemy and the party split up. The girls were ordered to follow the soldiers after a three hour interval. They did this only to find themselves on the bank of a river with no sign of the soldiers or any means of crossing. They remained in a nearby house until August 10th when they were captured by Kachin soldiers led by an English officer. They were taken to Myitkyina and then to the Lado stockade where the interrogations which form the basis of this report took place.

PROPAGANDA:

The girls knew practically nothing of any propaganda leaflets that had been used against the Japanese. They had seen a few leaflets in the hands of the soldiers but most of them were unable to understand them as they were in Japanese and the soldiers refused to discuss them with the girls. One girl

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remembered the leaflet about Col. Maruyama (apparently it was Myitkyina Troop Appeal), but she did not believe it. Others heard the soldiers discussing leaflets from time to time but no tangible remarks resulted from their eavesdropping. However it is interesting to note that one officer expressed the view that "Japan can't win this war".

REQUESTS

None of the girls appeared to have heard the loudspeaker used at Myitkyina, but they did overhear the soldiers mention a "radio broadcast".

They asked that leaflets telling of the capture of the "Comfort girls" should not be used for it would endanger the lives of other girls if the Army knew of their capture. They did think it would be a good idea to utilize the fact of their capture in any droppings planned for Korea.

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APPENDIX "A"

Following are the names of the twenty Korean "comfort girls" and the two Japanese civilians interrogated to obtain the information used in this report. The Korean names are phoneticized.

| <u>NAME</u> | <u>AGE</u> | <u>ADDRESS</u> |
|-------------------|------------|-----------------------------------|
| 1. Shin Jyun Nimi | 21 | Keishonando, Shinshu |
| 2. Kak Yonja | 28 | " Sanzengo, Yantai |
| 3. Pen Yonja | 26 | " Shinshu |
| 4. Chinga Chunto | 21 | Keishohokudo, Taiygy |
| 5. Chun Yonja | 27 | Keishonando, Shinshu |
| 6. Kim Manja | 25 | Keishohokudo, Taiygy |
| 7. Kim Yonja | 19 | " " |
| 8. Kim Kenja | 25 | Keishonando, Hsian |
| 9. Kim Sanni | 21 | " Kumboku |
| 10. Kim Kun Sun | 22 | " Taiygy |
| 11. Kim Chongi | 26 | " Shinshu |
| 12. Pa Kija | 27 | " " |
| 13. Chun Punyi | 21 | " Keisan Sun, Koyanien Iur |
| 14. Koko Sunyi | 21 | " Kungo, Sekiboku se, Kyu Ruri |
| 15. Yon Muji | 31 | Heiannando, Keijo |
| 16. Opu Ni | 20 | " " |
| 17. Kin Tonhi | 20 | Keikido, Keijo |
| 18. Ha Tonyo | 21 | " " |
| 19. Oki Song | 20 | Keishohokudo, Taiygy |
| 20. Kim Guptoge | 21 | Zonranando, Koshu |

Japanese Civilians:

| | | |
|---------------------|----|----------------|
| 1. Kitamura, Tomiko | 38 | Keikido, Keijo |
| 2. " Bibun | 41 | " " |

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**UNITED STATES
OFFICE OF WAR INFORMATION**

Psychological Warfare Team

Attached to

U.S. Army Forces

India-Burma Theater

APO 689

Japanese Prisoner
of War Interrogation
Report No. 49.

Place interrogated: Ledo Stockade

Date Interrogated: Aug. 20 - Sept. 10, 1944

Date of Report: October 1, 1944

By: T/3 Alex Yorichi

Prisoners: 20 Korean Comfort Girls

Date of Capture: August 10, 1944

Date of Arrival: August 15, 1944

at Stockade

PREFACE

This report is based on the information obtained from the interrogation of twenty Korean "comfort girls" and two Japanese civilians captured around the tenth of August, 1944 in the mopping up operations after the fall of Myitkyin in Burma.

The report shows how the Japanese recruited these Korean "comfort girls", the conditions under which they lived and worked, their relations with and reaction to the Japanese soldier, and their understanding of the military situation.

A "comfort girl" is nothing more than a prostitute or "professional camp follower" attached to the Japanese Army for the benefit of the soldiers. The word "comfort girl" is peculiar to the Japanese. Other reports show the "comfort girls" have been found wherever it was necessary for the Japanese Army to fight. This report however deals only with the Korean "comfort girls" recruited by the Japanese and attached to their Army in Burma. The Japanese are reported to have shipped some 703 of these girls to Burma in 1942.

RECRUITING;

Early in May of 1942 Japanese agents arrived in Korea for the purpose of enlisting Korean girls for "comfort service" in newly conquered Japanese territories in Southeast Asia. The nature of this "service" was not specified

but it was assumed to be work connected with visiting the wounded in hospitals, rolling bandages, and generally making the soldiers happy. The inducement used by these agents was plenty of money, an opportunity to pay off the family debts, easy work, and the prospect of a new life in a new land, Singapore. On the basis of these false representations many girls enlisted for overseas duty and were rewarded with an advance of a few hundred yen.

The majority of the girls were ignorant and uneducated, although a few had been connected with "oldest profession on earth" before. The contract they signed bound them to Army regulations and to war for the "house master" for a period of from six months to a year depending on the family debt for which they were advanced ...

Approximately 800 of these girls were recruited in this manner and they landed with their Japanese "house master" at Rangoon around August 20th, 1942. They came in groups of from eight to twenty-two. From here they were distributed to various parts of Burma, usually to fair sized towns near Japanese Army camps.

Eventually four of these units reached the Myitkyina. They were, Kyoei, Kinsui, Bakushinro, and Momoya. The Kyoei house was called the "Maruyama Club", but was changed when the girls reached Myitkyina as Col. Maruyama, commander of the garrison at Myitkyina, objected to the similarity to his name.

PERSONALITY;

The interrogations show the average Korean "comfort girl" to be about twenty-five years old, uneducated, childish, and selfish. She is not pretty either by Japanese or Caucasian standards. She is inclined to be egotistical and likes to talk about herself. Her attitude in front of strangers is quiet and demure, but she "knows the wiles of a woman." She claims to dislike her "profession" and would rather not talk either about it or her family. Because of the kind treatment she received as a prisoner from American soldiers at Myitkyina and Ledo, she feels that they are more emotional than Japanese soldiers. She is afraid of Chinese and Indian troops.

LIVING AND WORKING CONDITIONS;

In Myitkyina the girls were usually quartered in a large two story house (usually a school building) with a separate room for each girl. There each girl lived, slept, and transacted business. In Myitkyina their food was prepared by and purchased from the "house master" as they received no regular ration from the Japanese Army. They lived in near-luxury in Burma in comparison to other places. This was especially true of their second year in Burma. They lived well because their food and material was not heavily rationed and they had plenty of money with which to purchase desired articles. They were able to buy cloth, shoes, cigarettes, and cosmetics to supplement the many gifts given to them by soldiers who had received "comfort bags" from home.

While in Burma they amused themselves by participating in sports events with both officers and men, and attended picnics, entertainments, and social dinners. They had a phonograph and in the towns they were allowed to go shopping.

PRIOR SYSTEM;

The conditions under which they transacted business were regulated by the Army, and in congested areas regulations were strictly enforced. The Army found it necessary in congested areas to install a system of prices, priorities, and schedules for the various units operating in a particular areas. According to interrogations the average system was as follows:

- | | | | |
|-------------|---------------|----------|------------------|
| 1. Soldiers | 10 AM to 5 PM | 1.50 yen | 20 to 30 minutes |
| 2. NCOs | 5 PM to 9 PM | 3.00 yen | 30 to 40 minutes |
| 3. Officers | 9 PM to 12 PM | 5.00 yen | 30 to 40 minutes |

These were average prices in Central Burma. Officers were allowed to stay overnight for twenty yen. In Myitkyina Col. Maruyama slashed the prices to almost one-half of the average price.

SCHEDULES;

The soldiers often complained about congestion in the houses. In many situations they were not served and had to leave as the army was very strict about overstaying. In order to overcome this problem the Army set aside

certain days for certain units. Usually two men from the unit for the day were stationed at the house to identify soldiers. A roving MP was also on hand to keep order. Following is the schedule used by the "Kyo-ei" house for the various units of the 18th Division while at Naymyo.

| | |
|-----------|-----------------------------------|
| Sunday | 18 th Div. Hdqs. Staff |
| Monday | Cavalry |
| Tuesday | Engineers |
| Wednesday | Day off and weekly physical exam. |
| Thursday | Medics |
| Friday | Mountain artillery |
| Saturday | Transport |

Officers were allowed to come seven nights a week. The girls complained that even with the schedule congestion was so great that they could not care for all guests, thus causing ill feeling among many of the soldiers.

Soldiers would come to the house, pay the price and get tickets of cardboard about two inches square with the prior on the left side and the name of the house on the other side. Each soldier's identity or rank was then established after which he "took his turn in line". The girls were allowed the prerogative of refusing a customer. This was often done if the person were too drunk.

PAY AND LIVING CONDITIONS;

The "house master" received fifty to sixty per cent of the girls' gross earnings depending on how much of a debt each girl had incurred when she signed her contract. This meant that in an average month a girl would gross about fifteen hundred yen. She turned over seven hundred and fifty to the "master". Many "masters" made life very difficult for the girls by charging them high prices for food and other articles.

In the latter part of 1943 the Army issued orders that certain girls who had paid their debt could return home. Some of the girls were thus allowed to return to Korea.

The interrogations further show that the health of these girls was good. They were well supplied with all types of contraceptives, and often soldiers

would bring their own which had been supplied by the army. They were well trained in looking after both themselves and customers in the matter of hygiene. A regular Japanese Army doctor visited the houses once a week and any girl found diseased was given treatment, secluded, and eventually sent to a hospital. This same procedure was carried on within the ranks of the Army itself, but it is interesting to note that a soldier did not lose pay during the period he was confined.

REACTIONS TO JAPANESE SOLDIERS;

In their relations with the Japanese officers and men only two names of any consequence came out of interrogations. They were those of Col. Maruyama, commander of the garrison at Myitkyina and Maj. Gen. Mizukami, who brought in reinforcements. The two were exact opposites. The former was hard, selfish and repulsive with no consideration for his men; the latter a good, kind man and a fine soldier, with the utmost consideration for those who worked under him. The Colonel was a constant habitué of the houses while the General was never known to have visited them. With the fall of Myitkyina, Col. Maruyama supposedly deserted while Gen. Mizukami committed suicide because he could not evacuate the men.

SOLDIERS REACTIONS;

The average Japanese soldier is embarrassed about being seen in a "comfort house" according to one of the girls who said, "when the place is packed he is apt to be ashamed if he has to wait in line for his turn". However there were numerous instances of proposals of marriage and in certain cases marriages actually took place.

All the girls agreed that the worst officers and men who came to see them were those who were drunk and leaving for the front the following day. But all likewise agreed that even though very drunk the Japanese soldier never discussed military matters or secrets with them. Though the girls might start the conversation about some military matter the officer or enlisted man would not talk, but would in fact "scold us for discussing such unlady like subjects. Even Col. Maruyama when drunk would never discuss such matters."

The soldiers would often express how much they enjoyed receiving magazines, letters and newspapers from home. They also mentioned

the receipt of "comfort bags" filled with canned goods, magazines, soap, handkerchiefs, toothbrush, miniature doll, lipstick, and wooden clothes. The lipstick and cloths were feminine and the girls couldn't understand why the people at home were sending such articles. They speculated that the sender could only have had themselves or the "native girls".

MILITARY SITUATION;

"In the initial attack on Myitleyna and the airstrip about two hundred Japanese died in battle, leaving about two hundred to defend the town. Ammunition was very low.

"Col. Maruyama dispersed his men. During the following days the enemy were shooting haphazardly everywhere. It was a waste since they didn't seem to aim at any particular thing. The Japanese soldiers on the other hand had orders to fire one shot at a time and only when they were sure of a hit."

Before the enemy attacked on the west airstrip, soldiers stationed around Myitkyina were dispatched elsewhere, to storm the Allied attack in the North and West. About four hundred men were left behind, largely from the 114th Regiment. Evidently Col. Maruyama did not expect the town to be attacked. Later Maj. Gen. Mizukami of the 56th Division brought in reinforcements of more than two regiments but these were unable to hold the town.

It was the consensus among the girls that Allied bombings were intense and frightening and because of them they spent most of their last days in foxholes. One or two even carried on work there. The comfort houses were bombed and several of the girls were wounded and killed.

RETREAT AND CAPTURE;

The story of the retreat and final capture of the "comfort girls" is somewhat vague and confused in their own minds. From various reports it appears that the following occurred: on the night of July 31st a party of sixty three people including the "comfort girls" of three houses (Bakushinro was merged with Kinsui), families, and helpers, started across the Irrawaddy River in small boats. They eventually landed somewhere near Waingmaw, They stayed there until August 4th, but never entered Waingmaw. From

there they followed in the path of a group of soldiers until August 7th when there was a skirmish with the enemy and the party split up. The girls were ordered to follow the soldiers after three-hour interval. They did this only to find themselves on the bank of a river with no sign of the soldiers or any means of crossing. They remained in a nearby house until August 10th when they were captured by Kaahin soldiers led by an English officer. They were taken to Myitleyina and then to the Ledo stockade where the interrogation which form the basis of this report took place.

REQUESTS

None of the girls appeared to have heard the loudspeaker used at Myitkyina but very did overhear the soldiers mention a "radio broadcast."

They asked that leaflets telling of the capture of the "comfort girls" should not be used for it would endanger the lives of other girls if the Army knew of their capture. They did think it would be a good idea to utilize the fact of their capture in any droppings planned for Korea.

<End of Exhibit C>

This report corroborates well with writings by Hata(1999). The Korean women reported they were recruited by private sector agents with a promise of good income and prospect of a new life in a new land without any specific description of the nature of work, other than the work is related to provide services to the soldiers. Some were attracted by the possibility of being able to pay off their family debts. Hence they entered into an agreement by signing a contract to work for a House Master for a period of six months to a year, depending on the amount of advance payment received.²³

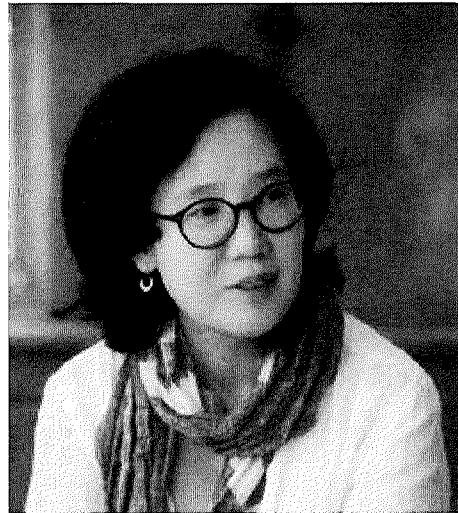
The report goes on to say these women lived a rather luxurious life. They purchased clothes, shoes, cosmetics; all with their money received as gifts from soldiers. They enjoyed picnics and parties with soldiers, and were allowed to go shopping into town. The work hours were regulated from 10 AM to 12 PM, but Wednesdays were designated as holidays, and for medical checkups. In addition, women were allowed to refuse services

²³ U.S. Office of War Information (1944), p.1.in Exhibit D.

<http://scholarsinenglish.blogspot.com.au/> The original book: <http://goo.gl/StGsnZ>

English Translation of Comfort Women Articles by Scholars
October 26, 2014

Summary of Professor Park Yuha's Book "Comfort Women of the Empire"



Professor Park Yuha

Preface

I first confronted the comfort women issue in 1991. It was near the end of my study in Japan. As a volunteer I was translating former Korean comfort women's testimonies for NHK. When I returned to South Korea, Kim Young-sam was the president, and Korean nationalism was on the rise. The anti-Japan lobby "Korean Council for the Women Drafted for Military Sexual Slavery by Japan" or "Chong Dae Hyup") in Korean was gaining momentum. Its leader said publicly it was determined to discredit Japan for the next 200 years. I regained my interest in this issue in the early 2000's when I heard that Chong Dae Hyup was confining surviving comfort women in a nursing home called "House of Nanumu." The only time these women were allowed to talk to outsiders was when Chong Dae Hyup needed them to testify for UN interrogators or U.S. politicians. But I was allowed to talk to them one day in 2003. One of the women (Bae Chun-hee) told me she reminisced the romance she had with a Japanese soldier and the sorrow when he died in combat. She said she hated her father who sold her. She also told me that women there didn't like being coached by Chong Dae Hyup to give false testimonies but had to obey Chong Dae Hyup's order. When Japan offered compensation through Asian Women's Fund in 1995, about 60 former Korean comfort women defied Chong Dae Hyup's order and accepted compensation. Those 60 women were vilified as traitors. Their names and addresses were published in newspapers as prostitutes by Chong Dae Hyup, and they had to live the rest of their lives in disgrace. So the surviving women were terrified of Chong Dae Hyup and wouldn't dare to defy again.

1. The origin of comfort women

With Japan's victory in Sino-Japanese war (1894 - 1895) the Korean Peninsula was no longer under the control of China. As Japanese military personnels and male workers began to spend time in Korea, women (mostly from Nagasaki and Kumamoto poor families) followed to comfort them.

2. Korean comfort women

After Korea became part of Japan in 1910, ethnic Korean women (Japanese citizens) also became comfort women. By 1920's Japanese women along with Korean women traveled abroad to comfort Japanese men and ethnic Korean men there.

3. Comfort women and female troops

Although women were working as prostitutes, some of them accumulated enough savings to lend money and rent places for secret meetings to men who were fighting for the nation. That is why they were also called female troops (娘子軍) and they took certain pride in their contribution.

4. Comfort stations

Comfort women system was not created suddenly by Japanese military in 1930's. At first Japanese military licensed existing prostitution houses in Manchuria as comfort stations. As Japan advanced into China and Southeast Asia, more comfort stations were needed. So Japanese military commissioned prostitution brokers to recruit more women and create more comfort stations. Japanese brokers recruited Japanese women in Japan. They owned and operated comfort stations employing Japanese women. Korean brokers recruited Korean women in Korea. They owned and operated comfort stations employing Korean women. (See footnote *3, *4)

5. Two types of comfort women

There were two types of comfort women. (1) Japanese, Korean and Taiwanese women (all Japanese citizens) - They were not coerced by Japanese military. (2) Local women in the battlefields (Dutch women in Indonesia, Filipino women in the Philippines, etc.) These two types should have been treated differently. But when the comfort women became an issue in the early 1990's, all women who provided sex to Japanese military were treated uniformly, and that created a big confusion.

6. The Myth "Korean comfort women were coerced by Japanese military"

The Korean woman who first claimed this in the early 1990's belonged to Chongsindae during the war. Chongsindae (also called Teishintai in Japanese) was a group of teenage girls conscripted by Japanese military. They worked in factories to manufacture military equipments and uniforms. Since she was conscripted, she thought comfort women were

also conscripted. It wasn't that she fabricated the story. It was an innocent mistake on her part. When I examined initial testimonies of former Korean comfort women, none of them claimed she was coercively taken away by Japanese military. (Japanese military was NOT in Korea) But some of them were recruited on false pretenses by Korean brokers.

7. The Myth "200,000 young girls were coerced by Japanese military"

Two hundred thousand was the number of factory workers conscripted. About 150,000 of them were Japanese and 50,000 were Koreans. Common misunderstanding in the West of "200,000 young girls were coerced by Japanese military" arose because Asahi Shimbun mistook factory workers for comfort women in August 11th, 1991 article. The estimates of comfort women numbers vary from 20,000 to 70,000 depending on the historians. Most comfort women were Japanese, Koreans and Taiwanese, and they were recruited by brokers, not by Japanese military. Most comfort women were not teenage girls but were in their 20's and 30's

8. Japanese military and Korean comfort women

Korean comfort women worked in kimono using Japanese names. Lower ranked soldiers committing violence to women were punished by higher ranked officers. Korean comfort station owners exploiting Korean women were also punished. Comfort women attended sports events, picnics and social dinners with both officers and men. They were also allowed to go shopping in towns.

9. Korean prostitution brokers

There is no evidence to support that Japanese military permitted Korean prostitution brokers to lie or use violence when recruiting Korean women or operating comfort stations. In fact there are documents which indicate that Japanese military sent orders to police in Korea to crack down on Korean brokers who engage in illegal recruiting. So if one wants to use the term "sex slaves" to describe former Korean comfort women, they were sex slaves of Korean brokers. They were not sex slaves of Japanese military. Japanese military personnels visited comfort stations only as customers. A diary written by a Korean comfort station manager was discovered in 2012, and it makes it clear that Korean brokers not only recruited women in the Korean Peninsula but also owned and operated comfort stations employing Korean women. And Korean women were treated badly by Korean brokers according to the memoir written by a former Korean comfort woman. Japanese and Taiwanese women worked at comfort stations owned and operated by Japanese brokers and were treated much better. That is why we hear little or no complaint from former Japanese and Taiwanese comfort women. Again, the common perception in the West that Japanese military operated comfort stations is incorrect.

10. Japan-Korea Annexation Treaty of 1910

Official Korean representatives did sign the treaty, and treaty documents do exist. So this treaty is legally binding.

11. Japan-South Korea Treaty of 1965

1965 Japan-South Korea Treaty was concluded to decide how to distribute assets. Japanese government asked South Korean government during treaty negotiation to identify and separate individual claims from the treaty because Japanese government wanted to make sure victims received compensation by delivering compensation directly to them. South Korean government declined, accepted the entire sum of 800 million dollars in place of its citizens and spent all of it on infrastructures and so on. Therefore it is not reasonable for South Korean government to keep asking for additional compensation from Japan.

(Note: Korean victims recently sued South Korean government claiming that 300 million of the 800 million dollars were meant for them)

12. Kono Statement in 1993

Kono Statement did not acknowledge that Japanese military coerced them. Therefore, there is no need to revise Kono Statement.

13. Asian Women's Fund

Asian Women's Fund was established by Japanese government in 1995. (Compensation came with a letter of apology from Prime Minister of Japan) Although Korean women were not coerced by Japanese military and all individual claims were settled in 1965 Japan-South Korea Treaty, Japanese government still offered additional compensation to Korean women through Asian Women's Fund as a good gesture. Ironically every nation involved except South Korea accepted compensation through Asian Women's Fund and reconciled with Japan. (Note: South Korean government and Korean women wanted to accept Asian Women's Fund as well, but the anti-Japan lobby 'Chong Dae Hyup' threatened Korean women not to accept Japan's apology and compensation so that it could continue its anti-Japanese propaganda campaign. So most Korean women could not accept Japan's apology and compensation.)

14. Why has it been so difficult to resolve this issue only with South Korea?

The anti-Japan lobby Chong Dae Hyup opposed Asian Women's Fund, claiming it did not go through a legislation vote in the House. But considering all individual claims were settled in 1965 Japan-South Korea Treaty, a cabinet member decision was the best Japanese government could do. Chong Dae Hyup has had a very close relationship with North Korea. The real reason why Chong Dae Hyup opposed Asian Women's Fund was because it wanted to use the comfort women issue to block reconciliation between Japan and South Korea. Japan-South Korea discord is precisely what North Korea wants. The dynamics of South Korean politics is very difficult for foreigners to grasp.

15. World's view

Instead of reconciling with Japan by accepting Japan's apology and compensation, Chong Dae Hyup (= North Korea) and its U.S. affiliate KACE have appealed to the world by

dragging former Korean comfort women (now in their 80's and 90's) around the world as exhibitions. UN reports such as Coomaraswamy Report and U.S. House Resolution 121 were issued based solely on materials provided by the Korean lobby. Most Western media and scholars fell for Chong Dae Hyup's (North Korean) propaganda and believe "200,000 young girls including Koreans were coercively taken away by Japanese military." This view is not based on facts. And Korean women were not coerced by Japanese military because the Korean Peninsula was not the battlefield and therefore Japanese military was NOT in Korea. The comfort women issue remains only with South Korea because Chong Dae Hyup refuses to accept Japan's apology and continues to spread the false claim of "200,000 young girls including Koreans were coerced by Japanese military" throughout the world. Chong Dae Hyup is a very powerful special interest group in South Korea, and Korean politicians are scared to defy it. Chong Dae Hyup has no interest in the welfare of former Korean comfort women. Its goal is to discredit Japan and to block reconciliation between Japan and South Korea.

16. Empires and comfort women

The United States has military bases all over the world. And wherever U.S. military bases are located, there are women who provide sex to U.S. military personnels. It is ironic that the United States keeps coming up with resolutions to criticize Japan and comfort women statues keep going up in the U.S.

◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇

Footnote: Professor Park Yuha's book "Comfort Women of the Empire" was banned from publishing in South Korea. Professor Park is also being sued for defamation by anti-Japan lobby and receives death threats from time to time. In South Korea, government often uses anti-Japan lobby to hunt down people who speak out the inconvenient truth. It is now very difficult for Professor Park to publish anything in Korea without being persecuted, but her books can be purchased in other Asian countries.

<http://scholarsinenglish.blogspot.jp/2014/10/former-korean-comfort-woman-mun-oku.html>

(*2) The following is a U.S. military report. Except for the part where it says "Japanese agents recruited women and Japanese housemasters operated comfort stations," this report is accurate. It should have said "ethnic Korean agents recruited Korean women and Korean housemasters operated comfort stations." **The U.S. military interrogator should have realized the ethnic Koreans (being Japanese nationals) used their Japanese surnames.**

<http://ww2db.com/doc.php?q=130>

(*3) The following article reports that Professor Ahn Byong Jik of Seoul University had recently discovered a diary written by a Korean comfort station manager. Professor Ahn

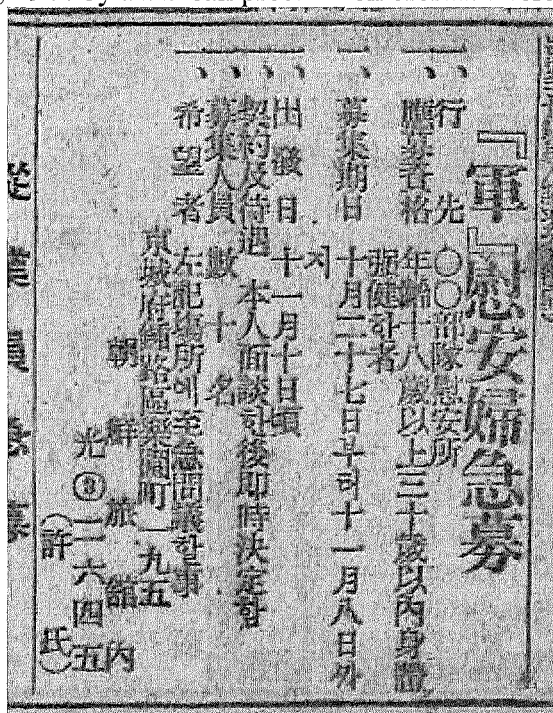
Byong Jik confirms in this article that **Korean comfort women were recruited by Korean prostitution brokers, not by Japanese military.**

<http://archive.today/ljcC4>

The Korean comfort station manager's diary (available only in Korean and Japanese) can be downloaded at the following site.

http://www.naksung.re.kr/xe/index.php?mid=sepdate&document_srl=181713&ckattempt=1

(*4) The photo below is a recruitment ad in Korean newspaper Maeil Sinbo on October 27, 1944 by a Korean prostitution broker. There are more ads like this.



Maeil Sinbo (Korean newspaper)

October 27, 1944 edition

Comfort women wanted

18 - 30 years old in good health

Apply between Oct. 27 & Nov. 8

Will depart on November 10th

Will negotiate pay upon interview

Apply at Kyeongseong-bu,

Jongrogu, Akwon-jeong 195

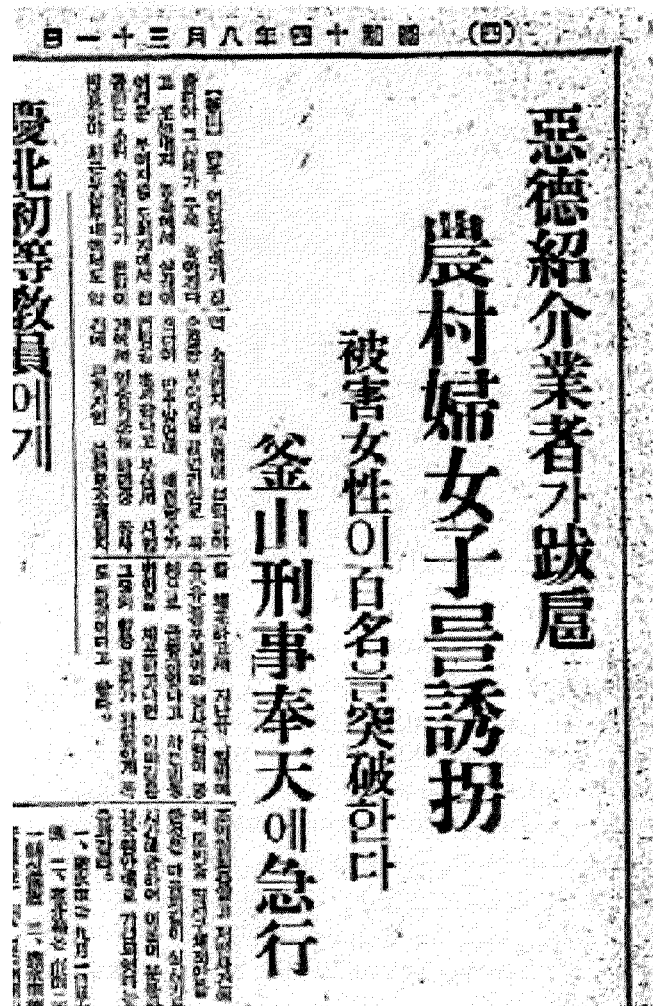
Inside Joseon Inn

Telephone: (3) 2645

Ask for Mr. Ho

(*5) The photo below is a record of how much a typical Korean comfort woman made.

(*6) The photo below is an article in Korean newspaper Dongailbo (동아일보 東亞日報) on August 31, 1939. It says, "**About 100 Korean women were abducted by Korean prostitution brokers but were rescued by Japanese military police.**" There are dozens of articles like this. (other articles)



(*7) The photo below is an order sent by Japanese military to police in Korea to crack down on Korean brokers who engage in illegal recruiting. Professor Yoshiaki deliberately misrepresented this document as proof that Japanese military coerced Korean women. Confronted by other scholars, Mr. Yoshimi admitted to Japanese media that he lied, but he never did so to Western media. New York Times in its 2007 article used his initial statement as proof that Japanese military coerced Korean women. Many scholars have demanded New York Times to retract the article, but NYT has refused to do so.



(*8) The photo below is an article in Korean newspaper Kyunghyang Shinmun (경향신문 京郷新聞) on June 6, 1977. It says that a female Korean prostitution broker trafficked dozens of Korean comfort women to Rabaul, Papua New Guinea to provide sex to Japanese soldiers there during World War II. It was common knowledge in South Korea until 1970's that Korean prostitution brokers recruited Korean comfort women and operated comfort stations, and no South Koreans contested that notion. Then Asahi Shimbun published a series of fabricated articles in 1980's falsely accusing Japanese military of abducting Korean comfort women. South Korean left (= North Korea) thought this was a great opportunity to discredit Japan and block reconciliation between Japan and South Korea. So it formed the anti-Japan lobby Chong Dae Hyup in 1990 and created the comfort women issue.

모든 뒷거래는 「관훈동요정」에서 이뤄져

상 손을 댈 처 보니 李萬鍾은 예사인
물이 아니었다.
라바울마담의 안락한 침실과는
아랑곳없이 수사는 급전전, 과거
대부분의 부정사건이 라바울마담의
요정에서 종결되고 말은 수사관들
도 라바울마담의 치맛자락에 휘감
겨 끌려들어간 사실이 드러났다.
드디어 李萬鍾은 미안죄와 뇌물공
제를 뱉쳐온 라바울마담을 보기 좋
게 구속하기에 이른다. 이윽에 이
사건은 「劉龍龍 사건」이라기보다 「라
바울 마담 사건」으로 알려지게 되
었다.
라바울마담은 원래 말기 원재해군
무관 松本의 애첩으로 수십명의 위
안부를 데리고 남태평양 라바울군도
에까지 위안정착을 떠나 라바울마
담이란 속칭을 얻었던 당대의 여걸
이었다. 해방이 되자 그녀는 노랑전
이던 원파정을 매인, 미군정대의 사
교장을 얻었다 (張澤相이 처음 부
임하면서 원파정의 허가를 불허하
고 보안과장을 구속한 사실은 이미
소개된 바 있다). 원파정을 당시 교의
지역에 자리잡고 있었지만, 미군
한국인 고위관리의 사교장이었고
자주 만스파티도 즐겼었다.
라바울마담의 수감생활은 明子라는
2대조반의 기생은 어느새 열여덟
배워 인기를 독차지했다. 이 원파
정을 떠나는 張澤相의 지필적 라바
울마담은 본래의 관혼동요정을 차
렸다가 경찰의 구속되는 비운을 맞
게 된 것이요.

【特別取材班】

1977.6.6 京郷日報

(*9) The photo below shows the relationship between the anti-Japan lobby Chong Dae

Hyup (Korean Council for the Women Drafted for Military Sexual Slavery by Japan) and North Korea.



Asahi Shimbun (left-wing Japanese newspaper with close ties to North Korea) published a series of fabricated articles on comfort women in 1980's. Based on these articles, the anti-Japan lobby Chong Dae Hyup was formed in South Korea in 1990. Then out of nowhere a woman named Kim Hak-sun came forward in 1991 and claimed she was abducted by Japanese military. There is clear evidence (recorded tapes) that suggests she was coached by Chong Dae Hyup to give false testimony. If Korean women were indeed abducted by Japanese military, it is rather odd that not a single woman claimed anything for over 45 years after the end of World War II. Former South Korean President Roh Tae-woo said in 1993 interview with Bungeishunju, "Asahi Shimbun created the comfort women issue out of nothing, provoked Korean nationalism and infuriated Korean people."

It is ironic that 99% of Westerners fell for Chong Dae Hyup's (North Korean) propaganda and believe 200,000 young girls including Koreans were coerced by

Japanese military while the majority of South Korean scholars (Professor Park Yuha of Sejong University, Professor Lee Yong-hoon of Seoul University, Professor Ahn Byong-jik of Seoul University, Professor Jun Bong-gwan of Korea Advanced Institute of Science and Technology, Professor Han Sung-jo of Korea University, Professor Lee Dae-gun of Sungkyunkwan University, Professor Choi Kei-ho of Kaya University, Professor Oh Seon-hwa of Takushoku University, Professor Chunghee Sarah Soh of San Francisco State University, etc.) and a good number of South Korean public agree that **Japanese military did not coerce Korean women** and that the number of women (Dutch and Filipino) coerced by Japanese military was less than a hundred. Westerners must realize that **North Korean and Chinese operatives are using the comfort women issue to drive a wedge into U.S.-Japan-South Korea security partnership.**

Posted by Pursuit of Truth Institute at 12:15 PM 1 comment:

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October 24, 2014

"The Comfort Women" by Professor C. Sarah Soh

Professor Chunghee Sarah Soh was born in South Korea and graduated from Sogang University there. She received her Ph.D. in anthropology from University of Hawaii. She is a professor of anthropology at San Francisco State University.



Professor Chunghee Sarah Soh

Professor Chunghee Sarah Soh's book "The Comfort Women" is available on Amazon.
<http://www.amazon.com/The-Comfort-Women-Postcolonial-Sexuality/dp/0226767779>

The following is an excellent book review.
<http://www.japantimes.co.jp/culture/2009/05/10/books/book-reviews/continuing-controversy-of-comfort-women/#.VLzLMpX9mcx>

In this book, Professor Soh criticizes the South Korean activist group "Korean Council" (also known as Chong Dae Hyup) for spreading North Korean propaganda and using the comfort women issue to block reconciliation between Japan and South Korea. She insists that Korean society must repudiate victimization, admit its complicity and accept that the system was not criminal. She also argues that the case of a small number of Dutch and Filipino women who were coerced by lower ranked Japanese soldiers in the battlefields was an anomaly, and that most women (Japanese, Korean and Taiwanese) were recruited and employed by prostitution brokers.

The following is an excerpt from her book "The Comfort Women." (Pages 10 - 11)

By 1920 some Korean women had become "overseas prostitutes." Those who worked at a restaurant in Sapporo, Japan, became what Yun Chŏng-ok calls "industrial comfort women," serving Korean men who worked there.⁴³ When the adult entertainment business in Korea suffered as a result of the Great Depression of the 1920s, female workers and business owners migrated to China. By the late 1920s the capital of colonial Korea, Kyŏngsŏng, was home to four pleasure quarters, which employed a total of 4,295 prostitutes.⁴⁴ By the mid-1930s 45 percent of Koreans had become infected with syphilis, compared to 15 percent of the French.⁴⁵ Beginning in the early 1930s many Korean women were sold overseas to labor as prostitutes. *Dong-a Ilbo*, one of Korea's major daily newspapers dating from the colonial days, reported on December 2, 1932, that about a hundred women a month were sold for 40 to 50 wŏn to brothels in Osaka, Hokkaido, Sakhalin, and Taiwan; this report, in hindsight, seems to predict the large-scale mobilization of Korean women to serve the troops through the 1930s up to 1945. In fact, the survivors' testimonials amply illustrate that during the war Korean men and women actively collaborated in the recruitment of young compatriots to service the Japanese military and also ran comfort stations. For young, uneducated women from impoverished families in colonial Korea, to be a victim of trafficking became "an ordinary misfortune" in the 1930s.⁴⁶ Amid widespread complicity and indifference to young women's plight, the adult entertainment business in Korea began to recover after the start of the Second Sino-Japanese War in 1937, and it flourished until early 1940.

When the war effort intensified in the early 1940s, however, many adult entertainment establishments had to close down, and by 1943 it was practically impossible to run such a business. This encouraged some brothel owners to seek their fortune abroad, including in Taiwan and occupied territories in the Southeast Asia. As Song Youn-ok noted, had there not been a "widespread network of traffic in women used in the state-managed prostitution system, the mobilization of Korean comfort women would have been a very different process."⁴⁷ Under grinding poverty, working-class families in colonial Korea sold unmarried daughters for 400–500 wŏn for a contractual period of four to seven years. The parents received 60–70 percent of the money after various expenses involved in the transaction had been deducted, such as the mediator's fee, clothing, document preparation, transport, and pocket money.⁴⁸ Kim Sun-ok, who labored at a comfort station in Manchuria for four years, recalled:

I had no childhood. I was sold four times from the age of seven. As soon as I returned to my home in P'yŏngsŏng from Sinŭi after nav-

In this excerpt it says, "By 1920 some Korean women had become overseas prostitutes. "Beginning in the early 1930's many Korean women were sold overseas to labor as prostitutes. Dong-a-Ilbo, one of Korea's major daily newspapers dating from the colonial days, reported on December 2, 1932, that about a hundred women a month were sold to brothels in Osaka, Hokkaido, Sakhalin and Taiwan; this report predicted the large-scale mobilization of Korean women to serve the troops through the 1930's up to 1945. In fact, survivors' testimonials amply illustrate that during the war Korean men and women actively collaborated in the recruitment of young compatriots to serve the Japanese military and also ran comfort stations." In an interview with Professor Chunghee Sarah Soh of San Francisco State University, a former Korean comfort woman Kim Sun-ok said that she was sold by her parents four times.

Yet she testified in front of UN interrogator Radhika Coomaraswamy that she was abducted by Japanese military.



Kim Sun-ok

◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇

In an interview with Professor Park Yuha of Sejong University in South Korea, a former Korean comfort woman Bae Chun-hee said that she hated her father who sold her.

Yet she testified in front of UN interrogator Radhika Coomaraswamy that she was abducted by Japanese military.

Bae Chun-hee

◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇

A former Korean comfort woman Mun Oku-chu said in her memoir:

"I was recruited by a Korean prostitution broker. I saved a considerable amount of money."

According to Professor Chunghee Sarah Soh's book, Mun Oku-chu continued to work as a prostitute in Korea after the war.

Yet she testified in front of UN interrogator Radhika Coomaraswamy that she was abducted by Japanese military.



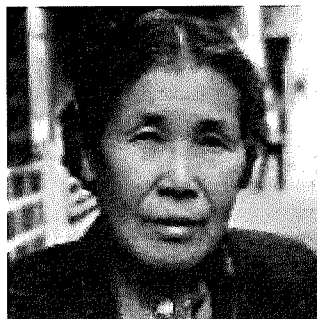
Mun Ok-chu

◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇

In an interview with Korean newspaper The Hankyoreh (the article was published on May 15th, 1991) a former Korean comfort woman Kim Hak-sun said that she was sold by her mother.

In an interview with Professor Chunghee Sarah Soh of San Francisco State University, Kim Hak-sun said that her mother sent her to train as a Geisha in Pyongyang before she sold her.

Yet she testified in front of UN interrogator Radhika Coomaraswamy that she was abducted by Japanese military.



Kim Hak-sun

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In an interview with Professor Ahn Byong Jik of Seoul University, a former Korean comfort woman Kim Gun-ja said that she was sold by her adoptive father.

Yet she testified in front of UN interrogator Radhika Coomaraswamy that she was abducted by Japanese military.

Kim Gun-ja also testified in front of United States House Committee on Foreign Affairs in 2007 and said she was abducted by Japanese military.



Kim Gun-ja

◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇

In an interview with Professor Ahn Byong Jik of Seoul University, a former Korean comfort woman Lee Yong-soo said that she and her friend Kim Pun-sun were recruited by a Korean prostitution broker.

In an interview with Professor Chunghee Sarah Soh of San Francisco State University, Lee Yong-soo said, "At the time I was shabbily dressed and wretched. On the day I left home with my friend Pun-sun without telling my mother, I was wearing a black skirt, a cotton shirt and wooden clogs on my feet. You don't know how pleased I was when I received a red dress and a pair of leather shoes from a Korean recruiter."

Yet she testified in front of UN interrogator Radhika Coomaraswamy that she was abducted by Japanese military.

Lee Yong-soo also testified in front of United States House Committee on Foreign Affairs in 2007. She was told that she had five minutes to speak. She ignored the instruction and went on for over one hour putting on a performance of crying and screaming. Her false testimony resulted in the passage of United States House of Representatives House Resolution 121.



Lee Yong-soo

◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇

In an interview with Professor Ahn Byong Jik of Seoul University, a former Korean comfort woman Kim Ok-sil said that she was sold by her father.

In an interview with Professor Chunghee Sarah Soh of San Francisco State University, Kim Ok-sil said that her father sent her to train as a Geisha in Pyongyang before he sold her.

Yet she testified in front of UN interrogator Radhika Coomaraswamy that she was abducted by Japanese military.

◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇

In an interview with Professor Ahn Byong Jik of Seoul University, a former Korean comfort woman Kil Won-ok said that she was sold by her parents.

In an interview with Professor Chunghee Sarah Soh of San Francisco State University, Kil Won-ok said that her parents sent her to train as a Geisha in Pyongyang before they sold her.

Yet she testified in front of UN interrogator Radhika Coomaraswamy that she was abducted by Japanese military.



Kil Won-ok

◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇

Several people had witnessed the scenes in which Chong Dae Hyup (anti-Japan lobby) coached women to say "I was abducted by Japanese military."

Professor Ahn Byong Jik of Seoul University who interviewed former Korean comfort women says, "When I first interviewed them, none of them had anything bad to say about Japanese military. In fact they all reminisced the good times they had with Japanese soldiers. But after Chong Dae Hyup confined them, their testimonies had completely changed."

◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇

Korean women were not abducted by Japanese military because the Korean Peninsula was not the battlefield and therefore Japanese military was **NOT** in Korea. (Korean prostitution brokers recruited Korean women in Korea and operated comfort stations in the battlefields) Japan apologized and compensated, and Netherlands, Indonesia, the Philippines and Taiwan had all accepted Japan's apology and reconciled with Japan. So there are no comfort women issues between those nations and Japan. The comfort women issue remains only with South Korea because Chong Dae Hyup refuses to accept Japan's apology and continues to spread the false claim of "200,000 young girls including Koreans were abducted by Japanese military" throughout the world.

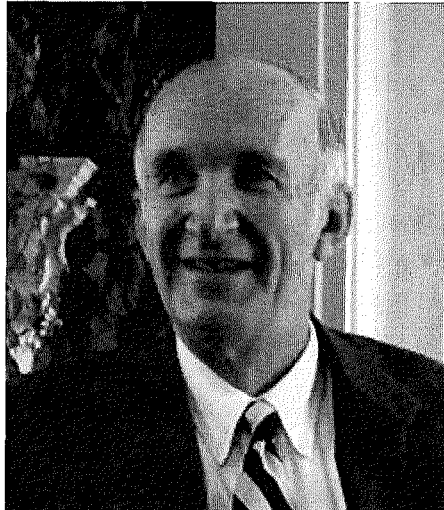
Posted by [Pursuit of Truth Institute](#) at 10:30 PM [No comments:](#)
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October 23, 2014

What Is Behind South Korea's Criticism On Comfort Women Issue

The following is a summary English translation of Professor James E. Auer's op-ed in Sankei Shimbun on October 22, 2014. Dr. Auer is an emeritus professor of international relations and public policy at Vanderbilt University.

The original post: <http://www.sankei.com/column/news/141022/clm1410220001-n1.html>



Professor James E. Auer

It is not surprising that China criticizes Japan because China is under Communist Party dictatorship. But why did South Korea begin to criticize Japan in the 1990's? and insists Japan's apology and compensation were not enough.

When the allied forces prosecuted war criminals, the comfort women system never became an issue because the U.S. military reports concluded with testimonies from Korean women that they either volunteered or were sold by their parents to Korean prostitution brokers.

Let us verify some facts.

1) Past and present, there were/are women who got/get into prostitution unwillingly. But prostitution is not slavery.

2) The comfort women system was not illegal in Japan's eyes in 1930's, and the allied forces didn't think it was illegal, either.

3) Korean government established comfort women system for U.S. troops in 1970's. Koreans for some reason think coercion and confinement took place in Japan's system but not in Korea's system.

4) If Japanese government or people tried to get facts out, the international community would perceive that effort as revisionism.

5) In August, Asahi Shimbun published retraction articles admitting it falsely reported on abduction in Jeju Island. Asahi also admitted it mistook factory workers for comfort women, which inflated the number of comfort women. Many Westerners praised Asahi for admitting its mistakes. However, what they failed to realize was Asahi told more lies in its retraction articles, which infuriated Japanese public. Westerners mistook mainstream Japanese's disgust toward Asahi for right wing's bashing on Asahi.

When Japan apologized for what it did during the war, its sincerity was backed by 50 odd years of good behavior.

In 1998, South Korean president Kim Dae-jung accepted apology from Japan's Prime Minister Keizo Obuchi and promised South Korea would never bring up the comfort women issue again. But subsequent Korean presidents have annulled Kim's gesture and used nationalism to bolster their low approval ratings.

Footnote: The following is a U.S. military report. Under 'Recruiting' this report misrepresents ethnic Korean agents and house masters using Japanese surnames as Japanese agents and house masters. (Ethnic Koreans were Japanese citizens at the time, so in that sense they were Japanese)

<http://ww2db.com/doc.php?q=130>

The following is excerpts from Korean comfort woman Mun Oku-chu's memoir. Her memoir is consistent with the U.S. military report.

<http://scholarsinenglish.blogspot.jp/2014/10/former-korean-comfort-woman-mun-oku.html>

Posted by [Pursuit of Truth Institute](#) at 8:37 AM No comments:
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October 19, 2014

◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇

October 18, 2014

"Comfort Women of the Empire" Reviewed by Professor Jun BongGwan

The following is a summary English translation of Professor Jun BongGwan's review of the book "Comfort Women of the Empire." Dr. Jun is a professor of Korean Literature at Korea Advanced Institute of Science and Technology. The review was published on July 20, 2014 in Korea's leading newspaper ChosunIlbo. The original article is shown at the

bottom.



Professor Jun BongGwan

After reading the book, I was a little bit disappointed because there was nothing in the book that I didn't know. We all knew that Korean comfort women were not coercively taken away by Japanese military. Japanese military commissioned Korean prostitution brokers to recruit women in the Korean Peninsula and operate comfort stations in the battlefields. Japanese military was busy fighting all over Asia, and it certainly didn't have time to be in Korea recruiting women.

Posted by [Pursuit of Truth Institute](#) at 11:47 PM No comments:
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October 17, 2014

Posted by [Pursuit of Truth Institute](#) at 12:32 PM No comments:
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October 16, 2014

Former Korean Comfort Woman Mun Oku-chu's Memoir The following is a English transaltion of excerpts from a former Korean comfort woman Mun Oku-chu's memoir.

The original memoir: <http://goo.gl/sI8Ett>



Ms. Mun Oku-chu

Posted by [Pursuit of Truth Institute](#) at 4:16 AM [No comments](#):

[Email This](#)[Blog This](#)! [Share to Twitter](#)[Share to Facebook](#)[Share to Pinterest](#)

BOS 11
CPages

From: Gregory Vilorio <greg.jtf@gmail.com>
Sent: Friday, September 04, 2015 12:30 AM
To: Avalos, John (BOS); Breed, London (BOS); Campos, David (BOS); Christensen, Julie (BOS); Cohen, Malia (BOS); Farrell, Mark (BOS); Kim, Jane (BOS); Mar, Eric (BOS); Tang, Katy (BOS); Wiener, Scott; Yee, Norman (BOS); Board of Supervisors, (BOS); Evans, Derek
Cc: judy hamaguchi; Lee, Mayor (MYR); san-francisco-jacl-chapter-board@googlegroups.com; Jill Yano
Subject: SF JACL Response to Supervisor Mar's "Comfort Women" Memorial Resolution (FILE NO. 150764)
Attachments: SF JACL Letter to BOS 20150902.pdf

Dear Board President and Supervisor London Breed,
Supervisor John Avalos,
Supervisor David Campos,
Supervisor Julie Christensen,
Supervisor Malia Cohen,
Supervisor Mark Farrell,
Supervisor Jane Kim,
Supervisor Eric Mar,
Supervisor Katy Tang,
Supervisor Scott Weiner,
Supervisor Norman Yee,
Clerk of the Board, Clerk for Public Safety and Neighborhood Services committee, Derek Evans

Good morning.

The attached letter addressed to the you, the Board of Supervisors of San Francisco, represent the views of the board of the San Francisco Japanese American Citizens League (SF JACL) - a local chapter of the Japanese American Citizens League, the oldest Asian American civil rights organization in the US.

We send this letter for reflection and consideration of a point of view on this resolution. In summary, our letter promotes the view of compassion and healing for the comfort women and their issues brought on by war and want to discourage any memorial (monument or written) that promotes hate towards a certain nationality amongst current and future generations.

I hope you, the Board of Supervisors, consider these points before your vote and/or comment on this resolution in chambers or in the Public Safety and Neighborhood Services committee.

If you have any questions or comments, please feel free to contact our board co-presidents, Judy Hamaguchi and Jill Yano (cc'd).

Respectfully submitted,

Greg C. Vilorio
SF JACL Board Member
1770 Post St #279
San Francisco, CA 94115

September 2, 2015

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

Supervisors: Madam Board President London Breed, Honorable John Avalos, Honorable David Campos, Honorable Julie Christiansen, Honorable Malia Cohen, Honorable Mark Farrell, Honorable Jane Kim, Honorable Eric Mar, Honorable Katy Tang, Honorable Scott Weiner, and Honorable Norman Yee

RE: Board of Supervisors File No. 150764, Resolution urging the City and County of San Francisco to establish a memorial for "Comfort Women." (As attached)

Dear San Francisco City Board of Supervisors:

The Board of Supervisors of the City of San Francisco is currently considering a resolution that calls for a physical memorial and a renewed condemnation of human rights violations committed by the Imperial Army of Japan during World War II. We, the Board of Directors of the San Francisco Chapter of the Japanese American Citizens League (JACL), respectfully ask you to consider our views on this matter.

The Board of Directors of the San Francisco Chapter of the JACL believes in the importance of drawing lessons from historic violations of civil rights and human rights. We are volunteer activists who believe deeply in the fight for civil rights for all. We draw particular inspiration from the civil rights violations experienced by Japanese Americans during World War II. During the war 120,000 persons of Japanese ancestry from the West Coast were forcibly incarcerated in 10 American concentration camps. Many lost their homes and businesses.

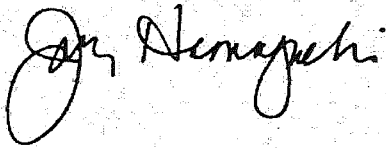
As civil rights activists, we support efforts by the Board of Supervisors that take action to prevent and stop human rights violations. The exploitation of children, violence against women, and human trafficking sadly still exist today. Vigilance is needed, even in San Francisco.

Violations of human rights that took place in the past must not be forgotten, if they are to provide lessons for current and future generations. Memorials of wartime horrors should be constructed in a manner that teaches tolerance, promotes healing, and inspires us all to work towards a future of peace. Historical lessons must be taught, but memorials should not be designed to pass on anger to current and future generations.

The Japanese American community has experienced first-hand what happens when an environment of racial hatred is allowed to permeate society. We are opposed to anything that promotes hate based on race or nationality.

Before issuing a resolution to support a memorial that projects hate towards a specific nationality, we ask the Board of Supervisors to consider whether such an action truly represents the values of the people of San Francisco. San Francisco has shown the world that we reject hate and embrace unity. Let's not turn back the clock.

Sincerely,

A handwritten signature in black ink, appearing to read "Judy Hamaguchi". The signature is fluid and cursive, with the first name "Judy" being more prominent and stylized.

Judy Hamaguchi, Chapter President
On behalf of the Board of Directors, San Francisco Chapter
Japanese American Citizens League

Chapter Board Members: John Hayashi, Nikki Hikari, Merry Nishimura,
Haruka Roudebush, Nancy Satoda, Barbara Suyehiro, Kenta Takamori, Greg
Viloria, Jill Yano

Attachment: Board of Supervisors File No. 150764, Resolution urging the City and County of San Francisco to establish a memorial for "Comfort Women."

1 [Urging the Establishment of a Memorial for "Comfort Women"]

2
3 **Resolution urging the City and County of San Francisco to establish a memorial for**
4 **"Comfort Women."**
5

6 WHEREAS, According to most international historians, the term "comfort women"
7 euphemistically refers to an estimated 200,000 women and young girls who were kidnapped
8 and forced into sexual slavery by the Imperial Japanese Army during its colonial and wartime
9 occupation of Asia and the Pacific Islands from the 1930s through the duration of World War
10 II; and

11 WHEREAS, During the 15 years of invasion and occupation of Asian countries,
12 unspeakable and well-documented war-crimes, including mass rape, wholesale massacres,
13 heinous torture, and other atrocities, were committed by the Japanese Imperial Army
14 throughout the occupied countries and colonies; and

15 WHEREAS, Of the few top Japanese military leaders who were investigated and
16 convicted as war criminals in the postwar War Crime Tribunals in Tokyo, Nanjing, Manila,
17 Yokohama, and Khabarovsk, many escaped prosecution; and

18 WHEREAS, In 2001 the San Francisco Board of Supervisors passed Resolution
19 No. 842-01, urging the government of Japan, on the 50th anniversary of the US-Japan Peace
20 Treaty, to fully acknowledge and apologize for Japan's wartime atrocities and provide just
21 compensation for the surviving victims of its aggression; and

22 WHEREAS, In 2007 the U.S. House of Representatives passed Rep. Mike Honda's
23 bipartisan House Resolution 121, which also called on the Government of Japan to formally
24 acknowledge, apologize, and accept historical responsibility for its Imperial Armed Forces'
25 coercion of young women into sexual slavery; and

1 WHEREAS, In 2013, the San Francisco Board passed Resolution No. 218-13
2 condemning Japan's denial of its system of sexual enslavement during World War II and
3 calling for justice for "comfort women"; and

4 WHEREAS, The year 2015 marks the 70th anniversary of the end of World War II
5 (1941-1945) and the Pacific War (1931-1945) and the defeat of Japanese imperialism and
6 militarism by the Allies; and

7 WHEREAS, Several cities in the U.S., including, Glendale and Rohnert Park, CA; Long
8 Island, NY; Palisades Park and Union City, NJ; Fairfax, VA; and Michigan City, MI have
9 already erected memorials to help remember the "comfort women" during Japanese
10 occupation in the Pacific War; and

11 WHEREAS, Today, human trafficking of women and girls is a form of modern day
12 slavery with 20 million victims worldwide, including an estimated 1.5 million victims in North
13 America alone, forced to perform labor and sexual acts; and human trafficking is a market-
14 driven criminal industry based on the principles of supply and demand, and

15 WHEREAS, San Francisco is not immune to the problem, and has been considered a
16 destination for human trafficking due to its ports, airports, industry, and rising immigrant
17 populations; and

18 WHEREAS, Leaders of the Japanese American community have worked closely with
19 the broader Asian Pacific Islander community in the past decades to strengthen relationships
20 and build trust, understanding, and community for civil rights and social justice; and

21 WHEREAS, San Francisco is a city of immigrants and their descendants, many of
22 whom have ancestral ties to Asian and Pacific Islander nations and have direct or indirect
23 experience with Japan's past system of sexual enslavement; and

24 WHEREAS, A growing coalition of immigrant communities, women's organizations, and
25 human rights groups have organized to establish a memorial for "comfort women" and the

1 millions of victims of the Japanese military in San Francisco to ensure that the plight and
2 suffering of these girls and women will never be forgotten or erased from history; now,
3 therefore, be it

4 RESOLVED, That appropriate City and County agencies will work with the community
5 organizations to design and establish the memorial; and, be it

6 FURTHER RESOLVED, That the Board of Supervisors of the City and County of San
7 Francisco during the 70th anniversary of the end of World War II expresses its strong support
8 of creating a memorial in memory of those girls and women who suffered immeasurable pain
9 and humiliation as sex slaves and as a sacred place for remembrance, reflection,
10 remorsefulness, and atonement for generations to come.

To: Evans, Derek; Caldeira, Rick (BOS)
Subject: FW: Against the proposal of building a Comfort Women memorial File No. 150764
Attachments: Comfort Women Not Sex Slaves But Prostitutes_FullVersion.pdf

From: Board of Supervisors, (BOS)
Sent: Wednesday, September 02, 2015 10:48 AM
To: BOS-Supervisors <bos-supervisors@sfgov.org>
Subject: FW: Against the proposal of building a Comfort Women memorial File No. 150764

From: Koichi Mera [<mailto:koichi.mera@verizon.net>]
Sent: Tuesday, September 01, 2015 2:51 PM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Subject: Against the proposal of building a Comfort Women memorial

Dear Supervisors for the City of San Francisco:

I am against the proposal to build a memorial for Comfort Women.
This is so because the proposal is based on a wrong interpretation of the Comfort Women.
In addition, the proposal is motivated by a political ambition of dividing the linkage between the U.S and Japan.
It is not based on human rights.
Please look at the attachment which elaborate our arguments.

Koichi Mera
Los Angeles

Comfort Women Not Sex Slaves but Prostitutes

Looking into Historical Evidence

- Neglected Facts and Voices -

Background of Comfort Women Issues

1. Historical Evidence
2. Origin and Development of Comfort Women Controversy
3. Political Implications

What is the controversy surrounding «Comfort Women»?

- Comfort Women are those who provided sexual services to Japanese Military during the WWII
- **Point of contention:**

Did JAPANESE GOVERNMENT FORCE these women into prostitution, or not?

Historical Evidence

- There are many «who said what», «who admitted what», various news reporting supporting contradictory views.
- **LET'S LOOK INTO PRIMARY SOURCES TO FIND OUT THE TRUTH**
 - Primary Sources : historical records
 - Secondary Sources: what other people heard about and wrote about (ex. recent newspaper articles, political statements, etc.)
- ***If Comfort Women were Sex Slaves orchestrated by Japanese government,***
 - = We should be able to find historical evidence!**

Historical Evidence 1: Tokyo War Trial, 1946

In this trial, Japan was judged for its deeds before and during the World War II

Allied Powers tried Japan for «Conventional atrocities» and «Crimes against humanity».

Comfort Women were not even mentioned in the trial

If Japanese Army did indeed enslave Korean women, why did NO ONE talk about it?

CONCLUSION:

Comfort Women were not considered as crime or atrocity at that time

Historical Evidence 2: Mr Rhee Syngman

- First President of the Republic of Korea (ROK) after its independence in 1948
- Zealous anti-Japan independence fighter
- Demanded extensive reparations to Japan
- No mention of reparation for Comfort Women

CONCLUSION:

Comfort Women were not considered as an issue, even by the politician who is known as the most anti-Japan President of the ROK

Historical Evidence 3: JP-ROK Basic Treaty, 1965

- This treaty settled **ALL CLAIMS AND REPARATIONS** regarding any matters related to Japan's annexation of Korea, except for Takeshima.
- By signing this treaty, *ROK agreed to demand no further compensation, either at the government or individual level*, after receiving \$800 million (2.3 times Korea's national budget of that time) in grants and soft loans from Japan as compensation for its 1910–45 colonial rule in the treaty.
- According to the records of negotiation, Japan proposed to compensate individuals directly but Korean government of the time refused, and used most of the money for its economic development.
- **COMFORT WOMEN WAS NEVER BROUGHT UP AS A MATTER OF REPARATION AND COMPENSATION**

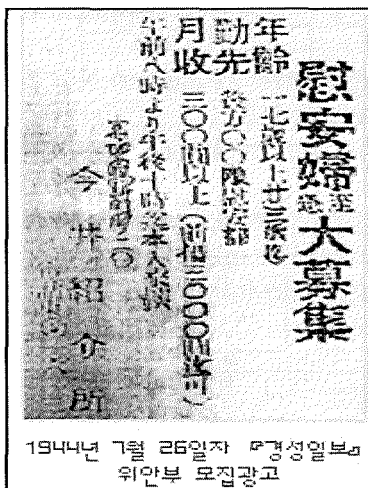
From the year the treaty was ratified, 1965, to 1982, no history-related anti-Japanese demonstration occurred, and the history was never brought up as political issue.

Historical Evidence 4: No Historical Documentation Backing Sex Slavery Found in Korea or in Japan

1. There is no documented evidence in Korea or Japan about how Japanese army rounded up the women in the form of diary, newspaper articles, etc. *Not even single one.*
2. And there is no trace of Korean people who fought against such slavery.

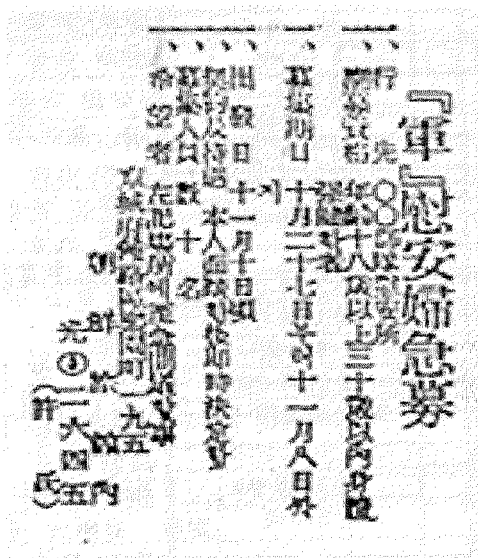
Historical Evidence 5: Copious numbers of Ads recruiting prostitutes found in Korea

- Several advertisements were found in Korean newspapers of the time, in which private middlemen recruited comfort women for Japanese Army, offering very high salary.



The exact wording of the advertisement : 京城日報 1944年7月26日広告
慰安婦至急大募集 (Comfort Women Urgently Wanted)
年齢 17歳以上23歳迄 (Age : between 17 and 23)
勤先 後方〇〇部隊慰安部 (Workstation :)
月収 300円以上 (前借3000円迄可) (Monthly Salary : at least 300 Yen. Advanced payment of up to 3000 Yen possible.)
午前8時より午後10時迄本人面談 (Interview between 8 AM and 10 PM)
京城*****20 (Address :)
今井紹介所 (Placement Agency Imai)

300 Yen of salary was three times that of the graduate of Keijyo Imperial University, the most prestigious university at that time – many women applied for the job – **NO NEED TO FORCE WOMEN IN PROSTITUTION**



1944년 10월 27일자 『매일신보』
위안부 모집광고

The exact wording of the advertisement : 朝鮮總督府機關紙
「毎日日報」 1944年10月27日

『軍』慰安婦急募 (« Army » Comfort Women Urgently Wanted)

- 一、行 先 ○○部隊慰安所 (Workstation :)
- 一、応募資格年齢十八歳以上三十歳以内 強健者
(Qualification Age : 18 to 30, in good health)
- 一、募集期日十月二十七日～十一月八日迄 (Application accepted: 27 Oct. to 8 Nov.)
- 一、出発日十一月十日頃 (Departure: around 10 Nov.)
- 一、契約及び待遇本人面談後即時決定 (Decision on contract and working conditions immediately upon the interview)
- 一、募集人員数十名 (Recruiting several dozens)
- 一、希望者左記住所で至急相談 (For interested candidates, contact immediately the following)
京城府鐘路*樂園町一九五
朝鮮旅館内
光*二六四五 (許 氏)

Historical Evidence 6: US Army Report No. 49

- The US Office of War Interrogation (APO689 August 1944) report
 - Interviewed 20 Korean “comfort girls” captured around 10 August 1944 after the fall of Myitkyina in Burma.
 - States they were recruited by private agents with a promise of good income
 - Confirms that women lived a rather luxurious life.
 - They were allowed to refuse services for those soldiers whom the women did not welcome.
 - They were allowed to return home after paying off their debts.

Historical Evidence 7: Bank Statement of a Former Comfort Woman

Name: *Mun Okchu* 文 玉珠 (문옥주)

Mainichi Newspaper reported on May 12, 1992 that Japanese military post office savings records confirmed that former Korean comfort woman Mun Okchu, one of the plaintiffs for a law-suit against Japanese government, and who had been asking for return of her money, had deposited money 12 times from 1943 to 1945, when she was a comfort woman, with a balance of 26,145 yen.

Mun Okchu claims that she had been taken from Pusan to Rangoon together with about one hundred to one hundred-fifty young women, to work as a prostitute for Japanese soldiers, and had deposited the tips she had received in the post office account.

Note: Calculated at today's value, this amount is equivalent to about 80 million yen (\$762,000 at 105 yen/dollar) --- November 1999 Showa History Institute periodical.

The General of the Japanese Imperial Army earned 6,600 yen per year, so Mun Okchu's annual earnings was about twice that of the General's. A private 2nd class earned as little as 72 yen per year.

原簿預払金調書

記号 戦 1/1 番号 656502

氏名 文原 玉珠

| 年 | 月 | 日 | 簿別 | 金 | 額 |
|----|----|---|----------|---|------|
| | | | | 百 | 十 |
| | | | | 千 | 円 |
| 27 | 2 | 2 | 新機 | 5 | 0.2 |
| 27 | 2 | 2 | 2月までの取立金 | | |
| 7 | 10 | | | 7 | 0.0 |
| 8 | 15 | | | 5 | 5.0 |
| 9 | 18 | | | 9 | 0.0 |
| 10 | 2 | | | 7 | 8.2 |
| 11 | 6 | | | 8 | 2.0 |
| 12 | 16 | | | | |
| 2 | 16 | | | 9 | 5.0 |
| 3 | 30 | | | 8 | 5.0 |
| 4 | 2 | | 4月までの取立金 | 7 | 2.5 |
| 5 | 18 | | | 1 | 12.0 |
| 6 | 21 | | | 8 | 0.0 |
| 7 | 21 | | 7月までの取立金 | 1 | 2.0 |
| 8 | 24 | | | 5 | 6.0 |
| 9 | 24 | | | 5 | 0.0 |
| 10 | 24 | | | 0 | 0.0 |
| 11 | 28 | | | 0 | 0.0 |
| 12 | 28 | | | 0 | 0.0 |
| 1 | 1 | | 1月までの取立金 | 6 | 8.0 |
| 2 | 2 | | 2月までの取立金 | 4 | 8.0 |
| 3 | 2 | | 3月までの取立金 | 7 | 2.0 |
| 4 | 2 | | 4月までの取立金 | 2 | 2.0 |
| 5 | 2 | | 5月までの取立金 | 7 | 2.0 |
| 6 | 2 | | 6月までの取立金 | 8 | 0.0 |
| 7 | 2 | | 7月までの取立金 | 8 | 2.0 |
| 8 | 2 | | 8月までの取立金 | 2 | 1.5 |

印紙 13号

[illegible]

Historical Evidence 8: Korean Men Volunteered to Join the Japanese Army

- Documented evidence about Korean men volunteered for Japanese Army.
 - Korean men volunteered to join the Japanese army.
 - Japanese army was so popular that it was very competitive to get in (less than 10% acceptance rate).
 - There were Korean generals and officers in Japanese Army.

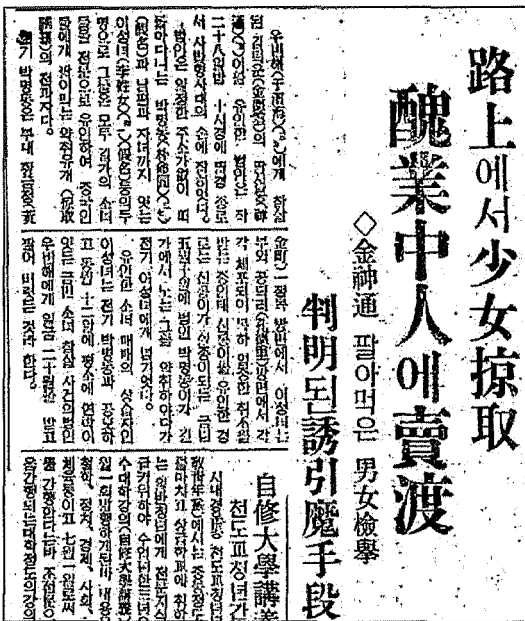
If Japanese Army did enslave Korean women, would Korean men have volunteered to join the Japanese Army?

Mr Park Chung-hee, current President's father, was elected Korean President after serving in Japanese Army. Would Korean people have elected an ex-Japanese Army Officer to Korean Presidency if Japanese Army had enslaved Korean women?

Historical Evidence 9: Japanese Official Documentation Prohibits Forceful Recruitment

- **Army Memorandum 2197, issued on March 4, 1938**, explicitly prohibits recruiting methods that fraudulently employ in the army's name or that can be classified as abduction, warning that those employing such methods would be punished.
- **A Home Affairs Ministry Directive (number 77) issued on February 18, 1938**, states that the recruitment of "comfort women" must be in compliance with international law and prohibits the enslavement or abduction of women.
- **A Directive (number 136) issued on November 8, 1938**, moreover, orders that only women who are 21 years old or over and are already professionally engaged in the trade may be recruited as "comfort women." It also requires the approval of the woman's family or relatives.

Historical Evidence 10: Japanese Police Arresting Human Trafficking in Korea



“Abducting a Girl – Selling her to Chinese Prostitution”

an article by Donga Daily, a major Korean newspaper, reported on 30 June 1933 an arrest by the police (under the authority of Japanese government-general of Korea) of a Korean human trafficking organization on 18 June, which was about to sell a girl to a Chinese brothel, and it notes that Japanese authority has increased police force in order to crack down on human trafficking.

「路上で少女略取。醜業中国人に売り渡し 金神通を売った男女
検挙 判明した誘拐魔の手段」東亜日報1933年6月30日付

民籍을偽造

醜業을強制

악마같은유곽업자의소행

犯人은警察에被逮

시내 서사현정(西四軒町)에 一백
七十八번지 오(吳)씨(吳顯煥)이라
는 자는 한남루(漢南樓)라는 상
호를 가지고 장기영업을 하는 중
지나를 五일 정(正)산정(山頂)을 내
에서 박(朴)씨(朴顯用)이라는 十六
세된 처녀를 三百五十원에 사다가

영양이 부족하여 영양을 할 수
없음으로 박(朴)씨의 형인 박순
남(朴順南)의 민지를 등본하여 다
가 영업허가권 내이고 불려온다

On May 5 1933, Donga Daily reports the arrest by the police under Japanese authority of a Korean prostitute who bought a girl of underage at 350 yen and attempted to falsify her age to the legal age for prostitution using her brothers' family register. The newspaper reports that the perpetrator committed the same crime with other underage girls.

「民籍을偽造 醜業을強制 惡魔のような遊郭業者の所業 犯人逮捕へ」 東亞日報1933年5月5日

On December 4 1938, Donga Daily reports the police arrest under Japanese authority in Pusan of a Korean on the charge of abductions and sales of girls from respectable families to Manchuria, which included not only Korean but also Japanese girls. The perpetrator, a brothel dealer in Gunsan of age 38, abducted girls named Teiko, age 19, and Shizuka, age 17, on 15 November 1938, by luring them with employment opportunities in Manchuria. He attempted to falsify a warrant of attorney to sell them to a brothel.

良家處女誘引害人

釜山者、犯人言逮捕

良家處女誘引해서
滿洲로賣却騙財
釜山者、犯人을逮捕

實事被逮

金山署對犯人嚴調

百濟에 매각하려고 군산으로 떠
리다가는것을 소관 부사有長史에
서 탐지 체포하고 襄陽府使조
중언에 이자는 소위 소개인이라한
판에서 이라한것임으로 양가의
처녀를 다수구인매각한 여조가만
타야가 거탄중중이다.

惡德紹介業者が跋扈

農村婦女子誘拐

被害女性이 自名을 突破한다

釜山刑事奉天에急行

慶北初等敎員에게

一、國慶日 九月一日
二、開光日 九月二日
三、開光日 九月三日
四、開光日 九月四日
五、開光日 九月五日
六、開光日 九月六日
七、開光日 九月七日
八、開光日 九月八日
九、開光日 九月九日
十、開光日 九月十日
十一、開光日 九月十一日
十二、開光日 九月十二日
十三、開光日 九月十三日
十四、開光日 九月十四日
十五、開光日 九月十五日
十六、開光日 九月十六日
十七、開光日 九月十七日
十八、開光日 九月十八日
十九、開光日 九月十九日
二十、開光日 九月二十日
二十一、開光日 九月二十一日
二十二、開光日 九月二十二日
二十三、開光日 九月二十三日
二十四、開光日 九月二十四日
二十五、開光日 九月二十五日
二十六、開光日 九月二十六日
二十七、開光日 九月二十七日
二十八、開光日 九月二十八日
二十九、開光日 九月二十九日
三十、開光日 九月三十日

Similarly, the police in Pusan under Japanese authority rescued over 100 victims who were abducted from farming villages by Korean human traffickers in 1939. Donga Daily reports “Corrupt Placement Agencies Rampant – Abducting Women and Girls in Farming Villages – Victims over 100.” This article reports Korean traffickers selling both Korean and Japanese women and girls. Donga Daily, 31 August 1939.

「悪徳紹介業者が跋扈。農村婦女子を誘拐。被害女性が100名を突破する～釜山の刑事。奉天へ急行」東亜日報1939年8月31日

遊鄕業者一娼妓盡地方則轉賣

警察官營業停止라도시킬方針

희생의 처분이나 한숨과 이 님이 있는데 그대도 두 천
左明君자는 경향 습관 죄조 형에 한숨이 많기 후에 판적이
메와 속속이기가 많았음을 말한다.

고상정 담화(조山談情) 卷二 三
對客問答에 판조를 하나 그대의
의 책판장이기도한 보람의 마

어다렸는데 이만사신이 함양세
상에 풀고되자 정기할형제에
서 처다온은 부남유림지사를
三,四兩일에 전후다아로전
그리고 豐稔 豐稔 未 六十一
니라하는데 사상은 의외의
으로보여져 첫조에 글들은
고있었다.

매하! 그들의 소행을 미연에 방지
케 재탄은 수고를 취하였나니。

이런 미야마 경치의 호로 그
 락을 구출하려는 계획은 달랑가
 긴세우데 그를 영장관의 경
 예사의 호중이 잇자 곧 지방으로
 급차출발한다는데 이 말이 이미

妙齡看護婦

路上飮毒

Donga Daily, 9 March 1939. "Numerous Enticement Cases – Brothel Dealers Abduct and Sell Women and Girls." The article states the police suspended brothel operations on the suspicion of human trafficking.

「遊郭業者の人身売買を憂慮して警察
が営業停止」東亜日報1939年3月9日

Donga Daily, 15 March 1939 reports the police under Japanese authority formed a special investigation team to enquire into a recruitment agency linked to a brothel operator selling girls abroad.

「河允明誘惑事件波紋拡大 悪辣な遊郭業者 警察の救出を念慮 続々海外に転売 人事紹介所に検察のメス 特別調査隊編成内探」東亜日報 1939年3月15日

河允明誘拐事件波紋擴大

惡辣한遊廓業者

警察의 救出을 念慮

續々外國으로 轉賣

人事紹介所に

檢察의 메스!

特別調査隊編成内探

【本紙記者東京十三日電】河允明誘拐事件、波紋擴大。悪辣な遊廓業者、警察の救出を念慮、續々海外に轉賣。人事紹介所に檢察のメス、特別調査隊編成内探。河允明誘拐事件、波紋擴大。悪辣な遊廓業者、警察の救出を念慮、續々海外に轉賣。人事紹介所に檢察のメス、特別調査隊編成内探。

Historical Evidence 11: Korean People had voting right and the right of representation in Japanese Diet

1. When Korea was annexed to Japan, Korean people had a voting right and the right of representation in Japanese Diet. They were legally Japanese citizens.

Very unlikely that the democratically elected Japanese government would have a policy of enslaving part of its voters as sex slaves.

2. In Korean Peninsula during Japanese rule, historical records indicate that approximately 80% of the local parliamentarians were Koreans, and many Koreans occupied high ranking positions in public institutions and the police. It is technically not feasible to carry out forced mobilization of Korean women.

3. Korean women were not coerced by Japanese military because the Korean Peninsula was not the battlefield and therefore Japanese military was NOT in Korea.

Historical Evidence 12: Japanese Authority prohibited the forced prostitution

- 1944, a group of Dutch women was forced into sexual servitude by 11 Japanese military personnel in Sumalan, Indonesia.
- The Japanese military authority explicitly ordered to hire comfort women only upon their consent; these officers ignored the order.
- When a father of one of the Dutch women reported the incidence to the Japanese military authority, his plea was immediately accepted and the comfort station in question was ordered to close. This comfort station was in operation for two months in total.
- The perpetrators were all judged and found guilty.
- *An example of Japanese Authority prohibiting sex slavery*

Historical Evidence 13: No Slavery in Japanese History

- In Japan's 2600 years of history, slavery never existed.
- It is not in the mentality of Japanese to enslave people.
- Suddenly do they decide to enslave women?
Documented evidence from WWII indicates contrary.

Interagency Work Group Report of 2007

Investigated Nazi War Crimes & Japanese Imperial Government Records
8 years of extensive study (1999-2007)

Covered 8 million pages of classified US official documents and spent USD 30 million

Published in April 2007 and reported to the US Congress

Studied by: Department of the State, the Secretary of Defense, the Attorney General, Director of the CIA, Director of the FBI, National Security Council, Director of the U.S. Holocaust Memorial Museum

- Objective was to uncover Japan's war crimes in Asia during the WWII
- In the extensive search of classified US official documents, no documented evidence of sex slavery by Japan was found.
- The report is available online

Interagency Work Group Report of 2007

«Among the disappointed (of the result of this study) will be those who had hoped for a voluminous release of U.S. records relating to Japanese war crimes..... Many people around the world had hoped that the IWG would unearth records that would help them document Japanese atrocities. To these people, I state unequivocally that the IWG was diligent and thorough in its search for relevant records about war crimes in Asia. The IWG uncovered and released few Asian theatre records because few such U.S. records remained classified. Unclassified records were not under IWG jurisdiction.»

Steven Garfinkel, Acting Chair, January 2001-September 2006
Washington, April 2007

Testimonies of Former Comfort Women

Report “Testimonies of Forcefully Mobilized Korean Comfort Women”, published in February 1993, by "Korean Council for the Women Drafted for Military Sexual Slavery by Japan" or "**Chong Dae Hyup**" (Anti-Japanese Lobby).

Dr. An Byong-jik, then a Seoul University professor of Korean History (now professor Emeritus) and the head of this study group testified that they interviewed 40 ex-comfort women and only 19 testimonies were considered reliable. He commented in the report that some testimonies seem to be “deliberately distorting the facts”. The 19 testimonies were published in the report.

- Only four ex-comfort women claimed that they were forcefully taken away. One claimed to have worked in Pusan, Korea, and another in Toyama Prefecture, Japan; however, there was no comfort station there as they were not a battlefield.

Testimonies of Former Comfort Women

- This report of ex-comfort women's testimonies were handed by the Korean Ministry of Foreign Affairs to the Japanese counterpart.

The most official report of Korea on ex-comfort women's testimonies is proven to have few reliable testimonies of forced mobilization.

Dr. An Byong-jik, having witnessed the fabrication of stories by "**Korean Council for the Women Drafted for Military Sexual Slavery by Japan**" or **Chong Dae Hyup (Anti-Japanese lobby)**, he discontinued his cooperation with the association.

Professor Ahn Byong Jik of Seoul University had discovered in 2013 a diary written by a Korean comfort station manager. Professor An Byong-Jik confirms that **Korean comfort women were recruited by Korean prostitution brokers, not by Japanese military.**

Several people had witnessed the scenes in which **Chong Dae Hyup** (anti-Japan lobby) coached former comfort women to say "I was abducted by Japanese military." (*The Comfort Women*, Chunghee Sarah Soh, Univ. of Chicago Press, 2008.)

- Professor An Byong-Jik of Seoul University who interviewed former Korean comfort women says, "When I first interviewed them, none of them had anything bad to say about Japanese military. In fact they all reminisced the good times they had with Japanese soldiers. But after **Chong Dae Hyup or "Korean Council for the Women Drafted for Military Sexual Slavery by Japan"** confined them, their testimonies had completely changed." (*The Comfort Women*, Chunghee Sarah Soh, 2008.)

What is *Chong Dae Hyup* (anti-Japan lobby) ?

- Members include North Korean spies (see the next slide)
- Considered by many in South Korea that *Chong Dae Hyup* is a North Korean Propaganda machine which tries to discredit Japan and prevents Japan-South Korea reconciliation, **thus weakening the military cooperation between South Korea, Japan and the US.**
- Initiator of Comfort Women statues in the US, which create fissures between Japan and the US, **thus weakens the US-Japan Security Alliance.**



The Link between **Chong Dae Hyup** or "**Korean Council for the Women Drafted for Military Sexual Slavery by Japan**" and the North Korean spies and the creators of comfort women memorials.

- Yun Mihyang is the Chair Woman of Chong Dae Hyup, who is known to have North Korea connection.
- Building of Comfort Women statue is backed by Chong Dae Hyup.
- Members include several N. Korean spies.

Reference for Further Readings

- Books are written by Korean academics on Comfort Women
- ***Comfort Women of the Empire*, by Park Yuha**, Professor, Yonsei University, 2014, in Japanese.
- ***The Comfort Women*, by C. Sarah Soh**, University of Chicago Press, 2008.

PART II:

How Did Comfort Women Controversy Started?

CHRONOLOGY OF EVENTS

1983 a book *“My War Crimes: Abduction of Korean Women”*, by **Seiji Yoshida**, claiming he was a team leader of a Japanese military group which rounded up many Korean girls in Cheju Island to send them to comfort stations.

- Yoshida claimed it to be a true story but later disproved and discredited as a fiction

• **August 11, 1991, Asahi Newspaper** revealed a Korean ex-comfort woman, Kim Hak-sun, **misreporting** that she testified that she was removed from her home and forced to join the «Women's Volunteer Corps». **(First coming-out of an ex-comfort woman)**

- However, in her petition to Japan, she clearly stated that she was sold by her mother for 40 yen to a Kisaeng school (for prostitutes) in Korea and later taken by her father-in-law to a comfort station in China.
- «Women's Volunteer Corps» is a group of women who had been called to work at war-related factories. Not related to comfort women. But Asahi described it as if this is a group of comfort women.

FIRST INCIDENT OF DELIBERATE FABRICATION OF COMFORT WOMEN ISSUE

- **August 14, 1989**, Cheju Island News reported that after its interviews with locals, the story of **Yoshida** was **proved to be completely groundless** as no locals witnessed such forced mobilisation by Japanese Army.

- But this report was largely ignored by the public.

• **January 11, 1992**, Asahi Newspaper reported : «an evidence of Japanese military involvement in the management of comfort stations was discovered»

- The article stated: Professor Yoshiaki YOSHIMI of Chuo University found a document issued by the Ministry of Army, regarding the recruitment of comfort women.
 - The details of the order was not disclosed in the article.
 - Yoshimi called for «Official apology and reparation» to Japanese government.
 - Asahi reported of «forceful mobilization of Korean women, which counts between 80,000 to 200,000.»
- Other researchers discovered : this was an order to enforce more rigorous selection procedure of private agencies recruiting comfort women, on the ground that some agencies have been recruiting women bordering on kidnapping. The order states «the Japanese military's honor is at stake.»
- **This documentation indicates Japan's policy of prohibiting forceful recruitment of comfort women.**
- **HOWEVER, THE PUBLIC BELIEVED ASAHI'S CLAIM BECAUSE THE DISPROVAL CAME MUCH LATER**

Summary: Certain private agents practice recruitment methods similar to abducting using the name of Japanese Army, and the Ministry called the chiefs of staff to ensure that such agents be kept clear of any recruitment process of Comfort Women by closely collaborating with the local police and the military police of the region, in order to avoid any misunderstanding with the local population and maintain the dignity and the honor of Japanese Army.

| | | | | | |
|----------|---------|---------|------|--|------|
| | 換有相定 | | 決議指定 | | 保存期限 |
| 大區 | | | 件名 | | |
| 委 | | | | | |
| 官 | 次 | 官次職務 | | | |
| | | | | | |
| 長岡縣主官副縣長 | 官典少 | | | | |
| | | | | | |
| 足保縣主 | 主務 | 書記官 | | | |
| | | | | | |
| 員岡縣主 | | | | | |
| | | | | | |
| 局會任大 | 臨時 | 局受主 | | | |
| 昭和 年 | 昭和 年 | 昭和 年 | | | |
| 三月十 | 二月 | 一月 | | | |

副官北支方面軍及中支駐屯軍

參詳長完通照

支那事變地ニ於テ先慰安所設置ノ爲内訌ニ於テ
之カ從軍師等ヲ募集スルニ當リ故ニ軍部詠解
等ノ名儀ヲ利用シ爲ニ軍ノ威信ヲ傷ツテ且之
敗兵ノ誤解ヲ招ク虞アルヲ或ハ從軍記者慰
問者等々今シテ不統制ニ募集シ社會問題ヲ
惹起スル虞アルヲ或ハ募集ニ任スル者ノ人選適
切ヲ欲ス爲ニ募集ノ方法誘拐ニ類シ警察當局
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- **January 13, 1992** – Then the Chief Cabinet Secretary, Mr Kouichi KATO, officially apologized to Korea **without corroborating the claim of Professor YOSHIMI of before-mentioned Asahi Article.**

(Asahi published the article just before Jp Prime Minister's visit to Korea, thus not giving time to Japan for investigation.)

- **January 17, 1992** – then the Prime Minister Kiichi MIYAZAWA visited South Korea and made 8 official apologies.
- **January 23, 1992** – Asahi reports YOSHIDA's claim «at least 950 women forcefully recruited»
- **February 17, 1992** – Japan Federation of Bar Association brings up the comfort women issue to the UN Human Rights Committee and ask for the UN intervention.
- **May 25, 1992** – Asahi reported that YOSHIDA would start «a journey of apology» to Korea – meaning apologies in front of Korean public

- **May 1992** – Professor Ikuhiko HATA, Chiba University, publish his research findings in Cheju Island and disproved YOSHIDA's testimony.
- **July 6, 1992** – Based on Professor HATA's findings, Japanese government conducts research on Japan's involvement in comfort women.
 - Chief Cabinet Secretary KATO, who previously apologized to Korea, confirmed «No evidence was found on forceful recruitment of women», «but military involvement in the management and supervision of comfort stations».
 - Discloses more than 100 official documents
- **August 12, 1992** – YOSHIDA visits Korea and apologize in front of Ms. Kim, the ex-comfort woman, who made the first coming-out.
- **December 25, 1992** – 10 ex-comfort women from Busan sue Japan
- **April 2, 1993** – 46 ex-comfort women from the Philippines sue Japan
- **April 5, 1993** - Song Sin-do, a Korean ex-comfort woman sue Japan

- **August 4, 1993 – KONO Statement** : then the Chief Cabinet Secretary Mr KONO officially recognizes Japanese Army's involvement in forced mobilization of comfort women.
 - The basis of this statement is the testimonies of 16 ex-comfort women, who were selected by Korean government.
 - Their testimonies were not disclosed to the public.
 - No counter-interrogation by Japanese government to these former comfort women were accepted by Korean government.

- **July 19, 1995** – Japan establishes Asian Women's Fund to provide reparations to ex-comfort women

April 19, 1996: Coomaraswamy Report

- UN Human Rights Commission publishes «Coomaraswamy Report», and defines comfort women as «sex slaves», and declares it is the violation of human rights.
- **Basis of Her Argument:**
 - Testimonies of former comfort women (Several former comfort women confessed they told a lie to Special Rapporteur, Ms. Coomaraswamy, that they were abducted by Japanese Army. List of confessions available at: Professor Chunghee Sarah Soh's book, *The Comfort Women*.)
 - Yoshida Seiji's testimony (Later proven to be a fiction)

- **May 3, 1994** – Minister of , Mr Shigeto NAGATO, declares «comfort women are prostitutes». Upon severe criticisms from Asian nations, he resigns 4 days later.
- **August 31, 1994** – then the Prime Minister Tomiichi MURAYAMA makes a public apology regarding comfort women issue
- **January 24, 1995** - Japan Federation of Bar Association makes a recommendation to Japanese government to compensate former comfort women individually
- **May 2 and 9, 1996** - Magazine *Shukan Shincho* publishes its interview with YOSHIDA, in which he admits part of his testimony was a fabrication, especially the «place where he hunted comfort women» (Cheju island : no locals new of the incident)

- **March 9, 1997 - Former Deputy Chief Cabinet Secretary, Mr Nobuo ISHIHARA, who was involved in drafting KONO Statement, revealed**

- The statement was based mostly on the testimonies of former comfort women. *But the authenticity of their testimonies was never verified.*
- There is a likelihood that the language of Kono Statement was coordinated with the Republic of Korea.
- *Political Compromise:* He testified that Korea promised not to raise this issue again if Japan publicly declares the existence of forceful recruitment of comfort women, and that the Japanese Military was involved in this matter. And Japan accepted Korea's demand in the hope that this issue will be settled after the Kono Statement.

- **June 17, 1997** – former Chief Cabinet Secretary Mr KONO «no documentation testifying force mobilization of comfort women was found, but that does not mean there was no forced mobilization.»
- **August 1998** - McDougall Report supporting the Coomaraswamy Report was ratified in the Committee On The Elimination Of Discrimination Against Women (CEDAW), Office of the High Commissioner for Human Rights
- **August 1998** - Comfort Women Museum opens in Korea
- **October 1998** – Professor Ikuo HATA testifies that YOSHIDA admitted in their private conversation his work was a fiction, published in magazine «Shokun!», November edition.

- **30 July 2007 - US House of Representatives passed House Resolution 121, which asks Japan to apologize to former comfort women and state the issue in Japan's history textbooks.**

- Initiated by Mr Mike HONDA, who cites as evidence
 - YOSHIDA's testimony, (Disproved)
 - Asian Women Fund, (Political gesture, not historical evidence)
 - Prime Ministers apologies, (Political gesture, not historical evidence)
 - KONO Statement (Later recognized to be a political compromise with Korea rather than a finding based on objective analysis)(Source: Feb. 25, 2007, *Reportage 2001*, 『報道2001』, a Japanese TV program.)
- Mr Mike HONDA has been financed by and collaborate *with the Global Alliance for Preserving the History of WWII*, an anti-Japanese organization linked to the Chinese communist government

- **June 20, 2014** – Japanese government publishes *Background Review of the process in the announcement of KONO Statement*

The review unveiled

1. Exchange of views between Japan and ROK took place concerning preparation of the Kono Statement
2. The ROK repeatedly demanded inclusion of falsified verbiage implying direct involvement of the Japanese government regarding the comfort women recruitment. Such demands were rejected by the Japanese government, but allowed phrases which may be interpreted as its involvement.
3. **The Statement was fully drafted prior to hearings** from the Korean former comfort women of how they were recruited, and treatments received while providing their services.

- **August 5, 2014 – Asahi Newspaper published an official recognition that its articles relative to the testimony of Seiji YOSHIDA regarding «hunting of comfort women» were false, and announced its decision to withdraw these articles published between 1980s to 1990s.**
- **25,768 Plaintiffs sued Asahi Newspaper for the defamation of Japan in March 25, 2015.** *(Asahi is a left-wing Japanese newspaper recruiting journalists from China and Korea every year.)*

PART III:

Comfort Women a Human Rights Issue?

Not likely – It is a POLITICAL ISSUE

Korea brings up only Japanese comfort women issue to the UN Human Rights Committee but keeps silence to its own forced prostitution and rapes, massacres which have abundant historical records.

CASE 1: Records indicate Korean government forced its own women to sexual servitude for the US military during the Korean War, which developed into law-suit in Korea. The plaintiffs show various records of forced servitude by the Korean government.

CASE 2: Abundant evidence indicates that Korean troops massacred and raped local women during Viet Nam War. **Lai Đại Hàn**, children born from these rapes are a serious issue that has not been resolved to date. No official compensation nor apology from Korea so far. No such children were born between Japanese Army and other nationals.

Geopolitical Context

EFFECTS OF COMFORT WOMEN ISSUE IN THE WORLD

- **Building of comfort women statues in the US, Canada, Australia, etc.** (Countries with which Japan is strengthening its security cooperation)

-> Anti-Japanese movements in the countries which have security cooperation with Japan.

- **US-Japan Security Treaty weakens**
- Japan Bashing increases in various countries
- Japan's isolation in the international community

-> **Who profits from this situation? Answer: CHINA.**

It proposed to form an anti-Japanese coalition between Russia, China, Korea and the United States. (Proof in the next slide.)

China's Grand Strategy Announced in Moscow

At the trilateral security conference between Russia, China and Korea in Moscow in 2012, Guo Syangan, vice-president of the Chinese Institute of International Affairs of the Chinese Ministry of Foreign Affairs announced:

The Voice of Russia (Russian national radio) reports:

"By consciously escalating the territorial disputes with its neighbors Japan showed that it does not recognize the results of World War II, stressed Guo Syangan. ... In his opinion, this is the reason why Japan must give up its claims not only for the South Kuril Islands, Dokdo (Takeshima) and Senkaku (Diaoyu) Islands, but also for Okinawa. Guo Syangan suggested forming a united anti-Japanese front that would include China, Russia and South Korea. The USA should also be included in the front in order to force Japan to recognize the results of World War II and give up its territorial claims to its neighbors."

Ivanova, Irina. "China proposes a united anti-Japanese front." The Voice of Russia, 15 Nov. 2012. Web.

In summary....

- China proposing an «anti-Japan» front to Russia, the US and South Korea.
 - Mastermind in this story is China.
 - Comfort Women issues, largely instigated by communists in North Korea, South Korea and Japan, aim to label Japan as «a country unwilling to admit its atrocities of WWII». When Japan refutes the sex slave theory, they label Japan as «growing nationalist» and «revisionist, imperialist», thus creating a fissure between Japan and the US, and with the rest of the world.
- ➡ Weakening Japan-US security alliance and isolate Japan in the international community.
- ➡ **Japan, without US military assistance, will not be able to defend Senkaku and Okinawa from China.**
- ➡ **China claiming these two territories as its own.**

Why does China want Senkaku & Okinawa?

Senkaku

- Located in midway between Taiwan and Japan. Important stronghold when defending Taiwan. If China controls Senkaku, the US cannot effectively send military forces to Taiwan.

Taiwan

- Taiwan, without US military protection, falls in the hand of China
- Situated at the crossing of East China Sea and South China Sea
- Control of Taiwan gives free hand over the critically important military / sea lane connecting these two seas
- Controlling Taiwan gives the control of the East and South China Seas and the access to the Pacific Ocean, effectively breaking the containment line of Japan-Taiwan-the Philippines. Easy to attack Japan and the Philippines from Taiwan.
- Japan, having its life-line sea lane dominated by China, will kneel down to China and becomes China's puppet

Okinawa

- One major access route to the Pacific Ocean is sailing between Okinawa and Miyako Island
- 74% of US force in Japan is based in Okinawa and ensures the security of East and South China Seas
- Half of the US power projection in the world comes from Okinawa. Eliminating US presence in Okinawa means break-down of US hegemony

East Asia Hegemony

- **Eliminating US military presence from East Asia by dominating Okinawa and Senkaku**
- **China gains Hegemony of East Asia**

Manipulating History

- China's intent: framing Senkaku and Okinawa as its own territories being dominated by Japan illegally since the WWII (*fabrication – Japan is the righteous owner of these islands*), and portrays Japan's rule of these islands as a proof that Japan is acting like imperialist from the WWII era, thus putting pressure on Japan to give up these islands – a case of manipulation of history. Comfort women issue is one of the tools to this end.
- Why use historical issues? – because the US cannot side with Japan regarding the WWII. (If sided with Japan, the US cannot justify dropping two atomic bombs and massacring over 100,000 civilians in Tokyo.) China's aim is to alienate the US from Japan.

CONCLUSION

Comfort Women
Issue

- Tool to defame Japan
- Isolate Japan internationally and alienate the US from Japan
- US-Japan Security Alliance nullified

China takes
Okinawa and
Senkaku

- Without US assistance, Japan cannot defend its territories against China
- Without US military support, much easier to take these strategically important islands from Japan

China establishes
East Asia
Hegemony

- Without Okinawa and Senkaku, the US cannot ensure its dominance of East Asia
- Effectively eliminating the US military presence from East Asia and establishing Chinese Hegemony in the region

ANNEXES

1. US Army Report No 49 (original and transcribed versions)
2. English Translation of Comfort Women Articles by Korean Scholars
October 26, 2014

National Archives at College Park

8601 Adelphi Road
College Park, MD 20740-6001

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Tony Marano

TX



July 11, 2013

Tony Marano

TX

Dear Mr. Marano:

This letter is in reply to your recent request to the National Archives for a copy of Japanese Prisoner of War Interrogation Report No. 49, which you saw posted on the Internet.

Per your request, we have enclosed a copy of the report, free-of-charge. It comes from Record Group 208 *Records of the Office of War Information*.

Sincerely,

Archives II Reference Section
National Archives at College Park, MD

Classified *3M/Kam*

UNITED STATES OFFICE OF WAR INFORMATION
Psychological Warfare Team
Attached to U.S. Army Forces India-Burma Theater
APO 689

| | | |
|---|---|--|
| Japanese Prisoner of War Interrogation Report No. 49. | Place interrogated: Date interrogated: Date of Report: By: | Ledo Stockade Aug. 20 - Sept. 10, 1944 October 1, 1944 T/3 Alex Torichi |
|---|---|--|

| | |
|---|---|
| Prisoners: Date of Capture: Date of Arrival at Stockade: | 20 Korean Comfort Girls August 10, 1944 August 15, 1944 |
|---|---|

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PREFACE:

This report is based on the information obtained from the interrogation of twenty Korean "comfort girls" and two Japanese civilians captured around the tenth of August, 1944 in the mopping up operations after the fall of Myitkyina in Burma.

The report shows how the Japanese recruited these Korean "comfort girls", the conditions under which they lived and worked, their relations with and reaction to the Japanese soldier, and their understanding of the military situation.

A "comfort girl" is nothing more than a prostitute or "professional camp follower" attached to the Japanese Army for the benefit of the soldiers. The word "comfort girl" is peculiar to the Japanese. Other reports show the "comfort girls" have been found wherever it was necessary for the Japanese Army to fight. This report however deals only with the Korean "comfort girls" recruited by the Japanese and attached to their Army in Burma. The Japanese are reported to have shipped some 703 of these girls to Burma in 1942.

RECRUITING:

Early in May of 1942 Japanese agents arrived in Korea for the purpose of enlisting Korean girls for "comfort service" in newly conquered Japanese territories in Southeast Asia. The nature of this "service" was not specified but it was assumed to be work connected with visiting the wounded in hospitals, rolling bandages, and generally making the soldiers happy. The inducement used by these agents was plenty of money, an opportunity to pay off the family debts, easy work, and the prospect of a new life in a new land - Singapore. On the basis of these false representations many girls enlisted for overseas duty and were rewarded with an advance of a few hundred yen.

The majority of the girls were ignorant and uneducated, although a few had been connected with "oldest profession on earth" before. The contract they signed bound them to Army regulations and to work for the "house master" for a period of from six months to a year depending on the family debt for which they were advanced.

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JCS DECLASSIFICATION PROGRAM

DATE: *1973*

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Approximately 800 of these girls were recruited in this manner and they landed with their Japanese "house master" at Rangoon around August 20th, 1942. They came in groups of from eight to twenty-two. From here they were distributed to various parts of Burma, usually to fair sized towns near Japanese Army camps. Eventually four of these units reached the Myitkyina vicinity. They were: Kyoei, Kinsui, Bakushinro, and Momoya. The Kyoei house was called the "Maruyama Club", but was changed when the girls reached Myitkyina as Col. Maruyama, commander of the garrison at Myitkyina, objected to the similarity to his name.

PERSONALITY:

The interrogations show the average Korean "comfort girl" to be about twenty five years old, uneducated, childish, whimsical, and selfish. She is not pretty either by Japanese or Caucasian standards. She is inclined to be egotistical and likes to talk about herself. Her attitude in front of strangers is quiet and demure, but she "knows the wiles of a woman." She claims to dislike her "profession" and would rather not talk either about it or her family. Because of the kind treatment she received as a prisoner from American soldiers at Myitkyina and Ledo, she feels that they are more emotional than Japanese soldiers. She is afraid of Chinese and Indian troops.

LIVING AND WORKING CONDITIONS:

In Myitkyina the girls were usually quartered in a large two story house (usually a school building) with a separate room for each girl. There each girl lived, slept, and transacted business. In Myitkyina their food was prepared by and purchased from the "house master" as they received no regular ration from the Japanese Army. They lived in near-luxury in Burma in comparison to other places. This was especially true of their second year in Burma. They lived well because their food and material was not heavily rationed and they had plenty of money with which to purchase desired articles. They were able to buy cloth, shoes, cigarettes, and cosmetics to supplement the many gifts given to them by soldiers who had received "comfort bags" from home.

While in Burma they amused themselves by participating in sports events with both officers and men; and attended picnics, entertainments, and social dinners. They had a phonograph, and in the towns they were allowed to go shopping.

PRICE SYSTEM:

The conditions under which they transacted business were regulated by the Army, and in congested areas regulations were strictly enforced. The Army found it necessary in congested areas to install a system of prices, priorities, and schedules for the various units operating in a particular area. According to interrogations the average system was as follows:

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| | | | |
|-------------|---------------|----------|------------------|
| 1. Soldiers | 10 AM to 5 PM | 1.50 yen | 20 to 30 minutes |
| 2. NCOs | 5 PM to 9 PM | 3.00 yen | 30 to 40 minutes |
| 3. Officers | 9 PM to 12 PM | 5.00 yen | 30 to 40 minutes |

These were average prices in Central Burma. Officers were allowed to stay overnight for twenty yen. In Myitkyina Col. Maruyama slashed the prices to almost one-half of the average price.

SCHEDULES:

The soldiers often complained about congestion in the houses. On many occasions they were not served and had to leave as the army was very strict about overstaying leave. In order to overcome this problem the Army set aside certain days for certain units. Usually two men from the unit for the day were stationed at the house to identify soldiers. A roving MP was also on hand to keep order. Following is the schedule used by the "Kyoei" house for the various units of the 18th Division while at Maymyo:

| | | |
|-----------|-------|-----------------------------------|
| Sunday | ----- | 18th Div. Hdqs. Staff |
| Monday | ----- | Cavalry |
| Tuesday | ----- | Engineers |
| Wednesday | ----- | Day off and weekly physical exam. |
| Thursday | ----- | Medics |
| Friday | ----- | Mountain artillery |
| Saturday | ----- | Transport |

Officers were allowed to come seven nights a week. The girls complained that even with the schedule congestion was so great that they could not care for all guests, thus causing ill feeling among many of the soldiers.

Soldiers would come to the house, pay the price and get tickets of cardboard about two inches square with the price on the left side and the name of the house on the other side. Each soldier's identity or rank was then established after which he "took his turn in line". The girls were allowed the prerogative of refusing a customer. This was often done if the person were too drunk.

PAY AND LIVING CONDITIONS:

The "house master" received fifty to sixty per cent of the girls' gross earnings depending on how much of a debt each girl had incurred when she signed her contract. This meant that in an average month a girl would gross about fifteen hundred yen. She turned over seven hundred and fifty to the "master". Many "masters" made life very difficult for the girls by charging them high prices for food and other articles.

In the latter part of 1943 the Army issued orders that certain girls who had paid their debt could return home. Some of the girls were thus allowed to return to Korea.

The interrogations further show that the health of these girls was good. They were well supplied with all types of contraceptives, and often soldiers would bring their own which

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had been supplied by the army. They were well trained in looking after both themselves and customers in the matter of hygiene. A regular Japanese Army doctor visited the houses once a week and any girl found diseased was given treatment, secluded, and eventually sent to a hospital. This same procedure was carried on within the ranks of the Army itself, but it is interesting to note that a soldier did not lose pay during the period he was confined.

REACTIONS TO JAPANESE SOLDIERS:

In their relations with the Japanese officers and men only two names of any consequence came out of interrogations. They were those of Col. Maruyama, commander of the garrison at Myitkyina, and Maj. Gen. Mizukami, who brought in reinforcements. The two were exact opposites. The former was hard, selfish and repulsive with no consideration for his men; the latter a good, kind man and a fine soldier, with the utmost consideration for those who worked under him. The Colonel was a constant habitue of the houses while the General was never known to have visited them. With the fall of Myitkyina, Col. Maruyama supposedly deserted while Gen. Mizukami committed suicide because he could not evacuate the men.

SOLDIERS' REACTIONS:

The average Japanese soldier is embarrassed about being seen in a "comfort house" according to one of the girls who said, "when the place is packed he is apt to be ashamed if he has to wait in line for his turn". However there were numerous instances of proposals of marriage and in certain cases marriages actually took place.

All the girls agreed that the worst officers and men who came to see them were those who were drunk and leaving for the front the following day. But all likewise agreed that even though very drunk the Japanese soldier never discussed military matters or secrets with them. Though the girls might start the conversation about some military matter the officer or enlisted man would not talk, but would in fact "scold us for discussing such unlady like subjects. Even Col. Maruyama when drunk would never discuss such matters."

The soldiers would often express how much they enjoyed receiving magazines, letters and newspapers from home. They also mentioned the receipt of "comfort bags" filled with canned goods, magazines, soap, handkerchiefs, toothbrush, miniature doll, lipstick, and wooden clogs. The lipstick and clogs were definitely feminine and the girls couldn't understand why the people at home were sending such articles. They speculated that the sender could only have had themselves or the "native girls" in mind.

REACTION TO THE MILITARY SITUATION:

It appears that they knew very little about the military situation around Myitkyina even up to and including the time of

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their retreat and capture. There is however some information worth noting:

* "In the initial attack on Myitkyina and the air strip about two hundred Japanese died in battle, leaving about two hundred to defend the town. Ammunition was very low.

"Col. Maruyama dispersed his men. During the following days the enemy were shooting haphazardly everywhere. It was a waste since they didn't seem to aim at any particular thing. The Japanese soldiers on the other hand had orders to fire one shot at a time and only when they were sure of a hit."

Before the enemy attacked on the west air strip, soldiers stationed around Myitkyina were dispatched elsewhere to stem the Allied attack in the North and West. About four hundred men were left behind, largely from the 114th Regiment. Evidently Col. Maruyama did not expect the town to be attacked. Later Maj. Gen. Mizukami of the 56th Division brought in reinforcements of more than two regiments but these were unable to hold the town.

It was the consensus among the girls that Allied bombings were intense and frightening and because of them they spent most of their last days in foxholes. One or two even carried on work there. The comfort houses were bombed and several of the girls were wounded and killed.

RETREAT AND CAPTURE:

The story of the retreat and final capture of the "comfort girls" is somewhat vague and confused in their own minds. From various reports it appears that the following occurred: on the night of July 31st a party of sixty three people including the "comfort girls" of three houses (Palu-shinro was merged with Kinsui), families, and helpers, started across the Irrawaddy River in small boats. They eventually landed somewhere near Waingmaw. They stayed there until August 4th, but never entered Waingmaw. From there they followed in the path of a group of soldiers until August 7th when there was a skirmish with the enemy and the party split up. The girls were ordered to follow the soldiers after a three hour interval. They did this only to find themselves on the bank of a river with no sign of the soldiers or any means of crossing. They remained in a nearby house until August 10th when they were captured by Kachin soldiers led by an English officer. They were taken to Myitkyina and then to the Leda stockade where the interrogations which form the basis of this report took place.

PROPAGANDA:

The girls know practically nothing of any propaganda leaflets that had been used against the Japanese. They had seen a few leaflets in the hands of the soldiers but most of them were unable to understand them as they were in Japanese and the soldiers refused to discuss them with the girls. One girl

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remembered the leaflet about Col. Maruyama (apparently it was Myitkyina Troop Appeal), but she did not believe it. Others heard the soldiers discussing leaflets from time to time but no tangible remarks resulted from their eavesdropping. However it is interesting to note that one officer expressed the view that "Japan can't win this war".

REQUESTS:

None of the girls appeared to have heard the loudspeaker used at Myitkyina, but they did overhear the soldiers mention a "radio broadcast".

They asked that leaflets telling of the capture of the "Comfort girls" should not be used for it would endanger the lives of other girls if the Army knew of their capture. They did think it would be a good idea to utilize the fact of their capture in any droppings planned for Korea.

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APPENDIX "A"

Following are the names of the twenty Korean "comfort girls" and the two Japanese civilians interrogated to obtain the information used in this report. The Korean names are phoneticized.

| <u>NAME</u> | <u>AGE</u> | <u>ADDRESS</u> |
|-------------------|------------|-----------------------------------|
| 1. Shin Jyun Nimi | 21 | Keishonando, Shinshu |
| 2. Kak Yonja | 28 | " Sanzengo, Yantai |
| 3. Pen Yonja | 26 | " Shinshu |
| 4. Chinga Chunto | 21 | Keishohokudo, Taijyu |
| 5. Chun Yonja | 27 | Keishonando, Shinshu |
| 6. Kim Manju | 25 | Keishohokudo, Taijyu |
| 7. Kim Yonja | 19 | " " |
| 8. Kim Kenja | 25 | Keishonando, Hsien |
| 9. Kim Senni | 21 | " Kwaboku |
| 10. Kim Kun Sun | 22 | " Taijyu |
| 11. Kim Chongi | 26 | " Shinshu |
| 12. Pa Kije | 27 | " " |
| 13. Chun Punyi | 21 | " Keisan Sun, Koygaon Iuri |
| 14. Koko Sunyi | 21 | " Kengo, Sekiboku to, Kyu Kuri |
| 15. Yon Kuji | 31 | Heiannando, Keijo |
| 16. Opu Ni | 20 | " " |
| 17. Kin Tonhi | 20 | Keikido, Keijo |
| 18. Ha Tonyo | 21 | " " |
| 19. Oki Song | 20 | Keishohokudo, Taijyu |
| 20. Kim Gupogo | 21 | Zonranando, Koshu |

Japanese Civilians:

| | | |
|---------------------|----|----------------|
| 1. Kitamura, Tomiko | 38 | Keikido, Keijo |
| 2. " Eibun | 41 | " " |

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**UNITED STATES
OFFICE OF WAR INFORMATION**

Psychological Warfare Team

Attached to

U.S. Army Forces
India-Burma Theater
APO 689

Japanese Prisoner
of War Interrogation
Report No. 49.

Place interrogated: Ledo Stockade
Date Interrogated: Aug. 20 - Sept. 10, 1944
Date of Report: October 1, 1944
By: T/3 Alex Yorichi
Prisoners: 20 Korean Comfort Girls
Date of Capture: August 10, 1944
Date of Arrival: August 15, 1944
at Stockade

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but it was assumed to be work connected with visiting the wounded in hospitals, rolling bandages, and generally making the soldiers happy. The inducement used by these agents was plenty of money, an opportunity to pay off the family debts, easy work, and the prospect of a new life in a new land, Singapore. On the basis of these false representations many girls enlisted for overseas duty and were rewarded with an advance of a few hundred yen.

The majority of the girls were ignorant and uneducated, although a few had been connected with "oldest profession on earth" before. The contract they signed bound them to Army regulations and to war for the "house master" for a period of from six months to a year depending on the family debt for which they were advanced ...

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The interrogations show the average Korean "comfort girl" to be about twenty-five years old, uneducated, childish, and selfish. She is not pretty either by Japanese or Caucasian standards. She is inclined to be egotistical and likes to talk about herself. Her attitude in front of strangers is quiet and demure, but she "knows the wiles of a woman." She claims to dislike her "profession" and would rather not talk either about it or her family. Because of the kind treatment she received as a prisoner from American soldiers at Myitkyina and Ledo, she feels that they are more emotional than Japanese soldiers. She is afraid of Chinese and Indian troops.

LIVING AND WORKING CONDITIONS;

In Myitkyina the girls were usually quartered in a large two story house (usually a school building) with a separate room for each girl. There each girl lived, slept, and transacted business. In Myitkyina their food was prepared by and purchased from the "house master" as they received no regular ration from the Japanese Army. They lived in near-luxury in Burma in comparison to other places. This was especially true of their second year in Burma. They lived well because their food and material was not heavily rationed and they had plenty of money with which to purchase desired articles. They were able to buy cloth, shoes, cigarettes, and cosmetics to supplement the many gifts given to them by soldiers who had received "comfort bags" from home.

While in Burma they amused themselves by participating in sports events with both officers and men, and attended picnics, entertainments, and social dinners. They had a phonograph and in the towns they were allowed to go shopping.

PRIOR SYSTEM;

The conditions under which they transacted business were regulated by the Army, and in congested areas regulations were strictly enforced. The Army found it necessary in congested areas to install a system of prices, priorities, and schedules for the various units operating in a particular areas. According to interrogations the average system was as follows:

- | | | | |
|-------------|---------------|----------|------------------|
| 1. Soldiers | 10 AM to 5 PM | 1.50 yen | 20 to 30 minutes |
| 2. NCOs | 5 PM to 9 PM | 3.00 yen | 30 to 40 minutes |
| 3. Officers | 9 PM to 12 PM | 5.00 yen | 30 to 40 minutes |

These were average prices in Central Burma. Officers were allowed to stay overnight for twenty yen. In Myitkyina Col. Maruyama slashed the prices to almost one-half of the average price.

SCHEDULES;

The soldiers often complained about congestion in the houses. In many situations they were not served and had to leave as the army was very strict about overstaying. In order to overcome this problem the Army set aside

certain days for certain units. Usually two men from the unit for the day were stationed at the house to identify soldiers. A roving MP was also on hand to keep order. Following is the schedule used by the "Kyoei" house for the various units of the 18th Division while at Naymyo.

| | |
|-----------|-----------------------------------|
| Sunday | 18 th Div. Hdqs. Staff |
| Monday | Cavalry |
| Tuesday | Engineers |
| Wednesday | Day off and weekly physical exam. |
| Thursday | Medics |
| Friday | Mountain artillery |
| Saturday | Transport |

Officers were allowed to come seven nights a week. The girls complained that even with the schedule congestion was so great that they could not care for all guests, thus causing ill feeling among many of the soldiers.

Soldiers would come to the house, pay the price and get tickets of cardboard about two inches square with the prior on the left side and the name of the house on the other side. Each soldier's identity or rank was then established after which he "took his turn in line". The girls were allowed the prerogative of refusing a customer. This was often done if the person were too drunk.

PAY AND LIVING CONDITIONS;

The "house master" received fifty to sixty per cent of the girls' gross earnings depending on how much of a debt each girl had incurred when she signed her contract. This meant that in an average month a girl would gross about fifteen hundred yen. She turned over seven hundred and fifty to the "master". Many "masters" made life very difficult for the girls by charging them high prices for food and other articles.

In the latter part of 1943 the Army issued orders that certain girls who had paid their debt could return home. Some of the girls were thus allowed to return to Korea.

The interrogations further show that the health of these girls was good. They were well supplied with all types of contraceptives, and often soldiers

would bring their own which had been supplied by the army. They were well trained in looking after both themselves and customers in the matter of hygiene. A regular Japanese Army doctor visited the houses once a week and any girl found diseased was given treatment, secluded, and eventually sent to a hospital. This same procedure was carried on within the ranks of the Army itself, but it is interesting to note that a soldier did not lose pay during the period he was confined.

REACTIONS TO JAPANESE SOLDIERS;

In their relations with the Japanese officers and men only two names of any consequence came out of interrogations. They were those of Col. Maruyama, commander of the garrison at Myitkyina and Maj. Gen. Mizukami, who brought in reinforcements. The two were exact opposites. The former was hard, selfish and repulsive with no consideration for his men; the latter a good, kind man and a fine soldier, with the utmost consideration for those who worked under him. The Colonel was a constant habitué of the houses while the General was never known to have visited them. With the fall of Myitkyina, Col. Maruyama supposedly deserted while Gen. Mizukami committed suicide because he could not evacuate the men.

SOLDIERS REACTIONS;

The average Japanese soldier is embarrassed about being seen in a "comfort house" according to one of the girls who said, "when the place is packed he is apt to be ashamed if he has to wait in line for his turn". However there were numerous instances of proposals of marriage and in certain cases marriages actually took place.

All the girls agreed that the worst officers and men who came to see them were those who were drunk and leaving for the front the following day. But all likewise agreed that even though very drunk the Japanese soldier never discussed military matters or secrets with them. Though the girls might start the conversation about some military matter the officer or enlisted man would not talk, but would in fact "scold us for discussing such unladylike subjects. Even Col. Maruyama when drunk would never discuss such matters."

The soldiers would often express how much they enjoyed receiving magazines, letters and newspapers from home. They also mentioned

the receipt of "comfort bags" filled with canned goods, magazines, soap, handkerchiefs, toothbrush, miniature doll, lipstick, and wooden clothes. The lipstick and cloths were feminine and the girls couldn't understand why the people at home were sending such articles. They speculated that the sender could only have had themselves or the "native girls".

MILITARY SITUATION;

"In the initial attack on Myitkyina and the airstrip about two hundred Japanese died in battle, leaving about two hundred to defend the town. Ammunition was very low.

"Col. Maruyama dispersed his men. During the following days the enemy were shooting haphazardly everywhere. It was a waste since they didn't seem to aim at any particular thing. The Japanese soldiers on the other hand had orders to fire one shot at a time and only when they were sure of a hit."

Before the enemy attacked on the west airstrip, soldiers stationed around Myitkyina were dispatched elsewhere, to storm the Allied attack in the North and West. About four hundred men were left behind, largely from the 114th Regiment. Evidently Col. Maruyama did not expect the town to be attacked. Later Maj. Gen. Mizukami of the 56th Division brought in reinforcements of more than two regiments but these were unable to hold the town.

It was the consensus among the girls that Allied bombings were intense and frightening and because of them they spent most of their last days in foxholes. One or two even carried on work there. The comfort houses were bombed and several of the girls were wounded and killed.

RETREAT AND CAPTURE;

The story of the retreat and final capture of the "comfort girls" is somewhat vague and confused in their own minds. From various reports it appears that the following occurred: on the night of July 31st a party of sixty three people including the "comfort girls" of three houses (Bakushinro was merged with Kinsui), families, and helpers, started across the Irrawaddy River in small boats. They eventually landed somewhere near Waingmaw, They stayed there until August 4th, but never entered Waingmaw. From

there they followed in the path of a group of soldiers until August 7th when there was a skirmish with the enemy and the party split up. The girls were ordered to follow the soldiers after three-hour interval. They did this only to find themselves on the bank of a river with no sign of the soldiers or any means of crossing. They remained in a nearby house until August 10th when they were captured by Kaahin soldiers led by an English officer. They were taken to Myitkyina and then to the Ledo stockade where the interrogation which form the basis of this report took place.

REQUESTS

None of the girls appeared to have heard the loudspeaker used at Myitkyina but very did overhear the soldiers mention a "radio broadcast."

They asked that leaflets telling of the capture of the "comfort girls" should not be used for it would endanger the lives of other girls if the Army knew of their capture. They did think it would be a good idea to utilize the fact of their capture in any droppings planned for Korea.

<End of Exhibit C>

This report corroborates well with writings by Hata(1999). The Korean women reported they were recruited by private sector agents with a promise of good income and prospect of a new life in a new land without any specific description of the nature of work, other than the work is related to provide services to the soldiers. Some were attracted by the possibility of being able to pay off their family debts. Hence they entered into an agreement by signing a contract to work for a House Master for a period of six months to a year, depending on the amount of advance payment received.²³

The report goes on to say these women lived a rather luxurious life. They purchased clothes, shoes, cosmetics; all with their money received as gifts from soldiers. They enjoyed picnics and parties with soldiers, and were allowed to go shopping into town. The work hours were regulated from 10 AM to 12 PM, but Wednesdays were designated as holidays, and for medical checkups. In addition, women were allowed to refuse services

²³ U.S. Office of War Information (1944), p.1 in Exhibit D.

<http://scholarsinenglish.blogspot.com.au/> The original book: <http://goo.gl/StGsnZ>

English Translation of Comfort Women Articles by Scholars
October 26, 2014

Summary of Professor Park Yuha's Book "Comfort Women of the Empire"



Professor Park Yuha

Preface

I first confronted the comfort women issue in 1991. It was near the end of my study in Japan. As a volunteer I was translating former Korean comfort women's testimonies for NHK. When I returned to South Korea, Kim Young-sam was the president, and Korean nationalism was on the rise. **The anti-Japan lobby "Korean Council for the Women Drafted for Military Sexual Slavery by Japan" or "Chong Dae Hyup"** in Korean was gaining momentum. **Its leader said publicly it was determined to discredit Japan for the next 200 years.** I regained my interest in this issue in the early 2000's when I heard that Chong Dae Hyup was confining surviving comfort women in a nursing home called "House of Nanumu." The only time these women were allowed to talk to outsiders was when Chong Dae Hyup needed them to testify for UN interrogators or U.S. politicians. But I was allowed to talk to them one day in 2003. One of the women (Bae Chun-hee) told me she reminisced the romance she had with a Japanese soldier and the sorrow when he died in combat. She said she hated her father who sold her. She also told me that women there didn't like being coached by Chong Dae Hyup to give false testimonies but had to obey Chong Dae Hyup's order. When Japan offered compensation through Asian Women's Fund in 1995, about 60 former Korean comfort women defied Chong Dae Hyup's order and accepted compensation. Those 60 women were vilified as traitors. Their names and addresses were published in newspapers as prostitutes by Chong Dae Hyup, and they had to live the rest of their lives in disgrace. So the surviving women were terrified of Chong Dae Hyup and wouldn't dare to defy again.

1. The origin of comfort women

With Japan's victory in Sino-Japanese war (1894 - 1895) the Korean Peninsula was no longer under the control of China. As Japanese military personnels and male workers began to spend time in Korea, women (mostly from Nagasaki and Kumamoto poor families) followed to comfort them.

2. Korean comfort women

After Korea became part of Japan in 1910, ethnic Korean women (Japanese citizens) also became comfort women. By 1920's Japanese women along with Korean women traveled abroad to comfort Japanese men and ethnic Korean men there.

3. Comfort women and female troops

Although women were working as prostitutes, some of them accumulated enough savings to lend money and rent places for secret meetings to men who were fighting for the nation. That is why they were also called female troops (娘子軍) and they took certain pride in their contribution.

4. Comfort stations

Comfort women system was not created suddenly by Japanese military in 1930's. At first Japanese military licensed existing prostitution houses in Manchuria as comfort stations. As Japan advanced into China and Southeast Asia, more comfort stations were needed. So Japanese military commissioned prostitution brokers to recruit more women and create more comfort stations. Japanese brokers recruited Japanese women in Japan. They owned and operated comfort stations employing Japanese women. Korean brokers recruited Korean women in Korea. They owned and operated comfort stations employing Korean women. (See footnote *3, *4)

5. Two types of comfort women

There were two types of comfort women. (1) Japanese, Korean and Taiwanese women (all Japanese citizens) - They were not coerced by Japanese military. (2) Local women in the battlefields (Dutch women in Indonesia, Filipino women in the Philippines, etc.) These two types should have been treated differently. But when the comfort women became an issue in the early 1990's, all women who provided sex to Japanese military were treated uniformly, and that created a big confusion.

6. The Myth "Korean comfort women were coerced by Japanese military"

The Korean woman who first claimed this in the early 1990's belonged to Chongsindae during the war. Chongsindae (also called Teishintai in Japanese) was a group of teenage girls conscripted by Japanese military. They worked in factories to manufacture military equipments and uniforms. Since she was conscripted, she thought comfort women were

also conscripted. It wasn't that she fabricated the story. It was an innocent mistake on her part. When I examined initial testimonies of former Korean comfort women, none of them claimed she was coercively taken away by Japanese military. (Japanese military was NOT in Korea) But some of them were recruited on false pretenses by Korean brokers.

7. The Myth "200,000 young girls were coerced by Japanese military"

Two hundred thousand was the number of factory workers conscripted. About 150,000 of them were Japanese and 50,000 were Koreans. Common misunderstanding in the West of "200,000 young girls were coerced by Japanese military" arose because Asahi Shimbun mistook factory workers for comfort women in August 11th, 1991 article. The estimates of comfort women numbers vary from 20,000 to 70,000 depending on the historians. Most comfort women were Japanese, Koreans and Taiwanese, and they were recruited by brokers, not by Japanese military. Most comfort women were not teenage girls but were in their 20's and 30's

8. Japanese military and Korean comfort women

Korean comfort women worked in kimono using Japanese names. Lower ranked soldiers committing violence to women were punished by higher ranked officers. Korean comfort station owners exploiting Korean women were also punished. Comfort women attended sports events, picnics and social dinners with both officers and men. They were also allowed to go shopping in towns.

9. Korean prostitution brokers

There is no evidence to support that Japanese military permitted Korean prostitution brokers to lie or use violence when recruiting Korean women or operating comfort stations. In fact there are documents which indicate that Japanese military sent orders to police in Korea to crack down on Korean brokers who engage in illegal recruiting. So if one wants to use the term "sex slaves" to describe former Korean comfort women, they were sex slaves of Korean brokers. They were not sex slaves of Japanese military. Japanese military personnels visited comfort stations only as customers. A diary written by a Korean comfort station manager was discovered in 2012, and it makes it clear that Korean brokers not only recruited women in the Korean Peninsula but also owned and operated comfort stations employing Korean women. And Korean women were treated badly by Korean brokers according to the memoir written by a former Korean comfort woman. Japanese and Taiwanese women worked at comfort stations owned and operated by Japanese brokers and were treated much better. That is why we hear little or no complaint from former Japanese and Taiwanese comfort women. Again, the common perception in the West that Japanese military operated comfort stations is incorrect.

10. Japan-Korea Annexation Treaty of 1910

Official Korean representatives did sign the treaty, and treaty documents do exist. So this treaty is legally binding.

11. Japan-South Korea Treaty of 1965

1965 Japan-South Korea Treaty was concluded to decide how to distribute assets. Japanese government asked South Korean government during treaty negotiation to identify and separate individual claims from the treaty because Japanese government wanted to make sure victims received compensation by delivering compensation directly to them. South Korean government declined, accepted the entire sum of 800 million dollars in place of its citizens and spent all of it on infrastructures and so on. Therefore it is not reasonable for South Korean government to keep asking for additional compensation from Japan.

(Note: Korean victims recently sued South Korean government claiming that 300 million of the 800 million dollars were meant for them)

12. Kono Statement in 1993

Kono Statement did not acknowledge that Japanese military coerced them. Therefore, there is no need to revise Kono Statement.

13. Asian Women's Fund

Asian Women's Fund was established by Japanese government in 1995. (Compensation came with a letter of apology from Prime Minister of Japan) Although Korean women were not coerced by Japanese military and all individual claims were settled in 1965 Japan-South Korea Treaty, Japanese government still offered additional compensation to Korean women through Asian Women's Fund as a good gesture. Ironically every nation involved except South Korea accepted compensation through Asian Women's Fund and reconciled with Japan. (Note: South Korean government and Korean women wanted to accept Asian Women's Fund as well, but the anti-Japan lobby 'Chong Dae Hyup' threatened Korean women not to accept Japan's apology and compensation so that it could continue its anti-Japanese propaganda campaign. So most Korean women could not accept Japan's apology and compensation.)

14. Why has it been so difficult to resolve this issue only with South Korea?

The anti-Japan lobby Chong Dae Hyup opposed Asian Women's Fund, claiming it did not go through a legislation vote in the House. But considering all individual claims were settled in 1965 Japan-South Korea Treaty, a cabinet member decision was the best Japanese government could do. Chong Dae Hyup has had a very close relationship with North Korea. The real reason why Chong Dae Hyup opposed Asian Women's Fund was because it wanted to use the comfort women issue to block reconciliation between Japan and South Korea. Japan-South Korea discord is precisely what North Korea wants. The dynamics of South Korean politics is very difficult for foreigners to grasp.

15. World's view

Instead of reconciling with Japan by accepting Japan's apology and compensation, Chong Dae Hyup (= North Korea) and its U.S. affiliate KACE have appealed to the world by

dragging former Korean comfort women (now in their 80's and 90's) around the world as exhibitions. UN reports such as Coomaraswamy Report and U.S. House Resolution 121 were issued based solely on materials provided by the Korean lobby. Most Western media and scholars fell for Chong Dae Hyup's (North Korean) propaganda and believe "200,000 young girls including Koreans were coercively taken away by Japanese military." This view is not based on facts. And Korean women were not coerced by Japanese military because the Korean Peninsula was not the battlefield and therefore Japanese military was NOT in Korea. The comfort women issue remains only with South Korea because Chong Dae Hyup refuses to accept Japan's apology and continues to spread the false claim of "200,000 young girls including Koreans were coerced by Japanese military" throughout the world. Chong Dae Hyup is a very powerful special interest group in South Korea, and Korean politicians are scared to defy it. Chong Dae Hyup has no interest in the welfare of former Korean comfort women. Its goal is to discredit Japan and to block reconciliation between Japan and South Korea.

16. Empires and comfort women

The United States has military bases all over the world. And wherever U.S. military bases are located, there are women who provide sex to U.S. military personnels. It is ironic that the United States keeps coming up with resolutions to criticize Japan and **comfort women statues keep going up in the U.S.**

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Footnote: Professor Park Yuha's book "Comfort Women of the Empire" was banned from publishing in South Korea. Professor Park is also being sued for defamation by anti-Japan lobby and receives death threats from time to time. In South Korea, government often uses anti-Japan lobby to hunt down people who speak out the inconvenient truth. It is now very difficult for Professor Park to publish anything in Korea without being persecuted, but her books can be purchased in other Asian countries.

<http://scholarsinenglish.blogspot.jp/2014/10/former-korean-comfort-woman-mun-oku.html>

(*2) The following is a U.S. military report. Except for the part where it says "Japanese agents recruited women and Japanese housemasters operated comfort stations," this report is accurate. It should have said "ethnic Korean agents recruited Korean women and Korean housemasters operated comfort stations." **The U.S. military interrogator should have realized the ethnic Koreans (being Japanese nationals) used their Japanese surnames.**

<http://ww2db.com/doc.php?q=130>

(*3) The following article reports that Professor Ahn Byong Jik of Seoul University had recently discovered a diary written by a Korean comfort station manager. Professor Ahn

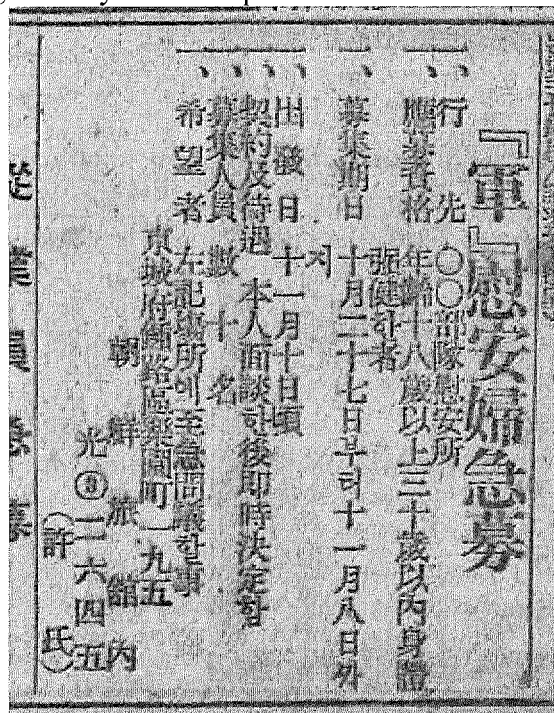
Byong Jik confirms in this article that **Korean comfort women were recruited by Korean prostitution brokers, not by Japanese military.**

<http://archive.today/ljcC4>

The Korean comfort station manager's diary (available only in Korean and Japanese) can be downloaded at the following site.

http://www.naksung.re.kr/xe/index.php?mid=sepdate&document_srl=181713&ckattempt=1

(*4) The photo below is a recruitment ad in Korean newspaper Maeil Sinbo on October 27, 1944 by a Korean prostitution broker. There are more ads like this.



Maeil Sinbo (Korean newspaper)

October 27, 1944 edition

Comfort women wanted

18 - 30 years old in good health

Apply between Oct. 27 & Nov. 8

Will depart on November 10th

Will negotiate pay upon interview

Apply at Kyeongseong-bu,

Jongrogu, Akwon-jeong 195

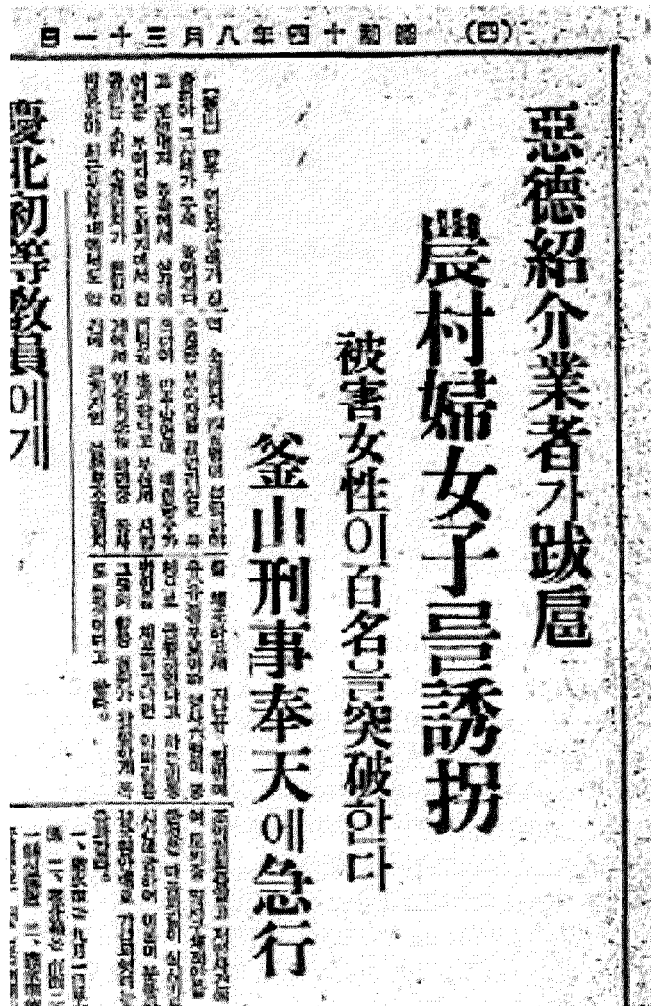
Inside Joseon Inn

Telephone: (3) 2645

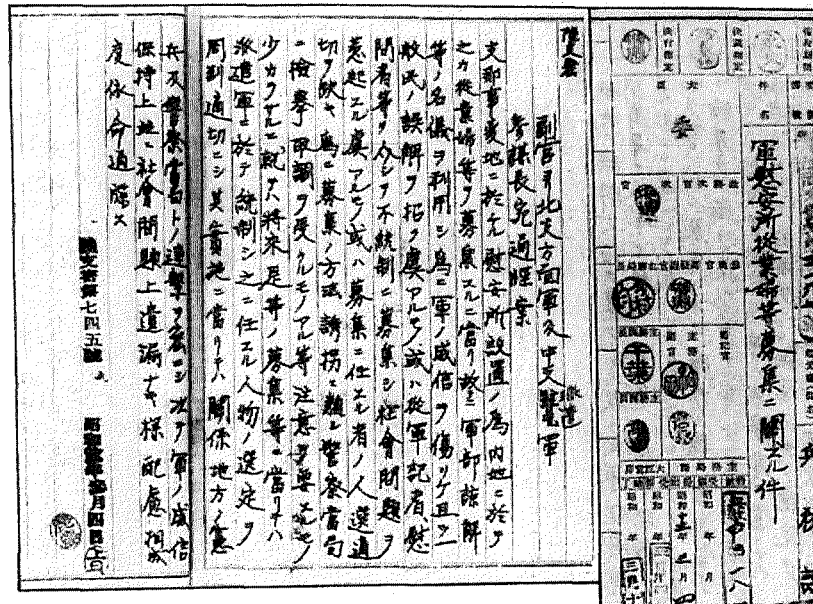
Ask for Mr. Ho

(*5) The photo below is a record of how much a typical Korean comfort woman made.

(*6) The photo below is an article in Korean newspaper Dongailbo (동아일보 東亞日報) on August 31, 1939. It says, "**About 100 Korean women were abducted by Korean prostitution brokers but were rescued by Japanese military police.**" There are dozens of articles like this. ([other articles](#))



(*7) The photo below is an order sent by Japanese military to police in Korea to crack down on Korean brokers who engage in illegal recruiting. Professor Yoshiaki deliberately misrepresented this document as proof that Japanese military coerced Korean women. Confronted by other scholars, Mr. Yoshimi admitted to Japanese media that he lied, but he never did so to Western media. New York Times in its 2007 article used his initial statement as proof that Japanese military coerced Korean women. Many scholars have demanded New York Times to retract the article, but NYT has refused to do so.



(*8) The photo below is an article in Korean newspaper Kyunghyang Shinmun (경향신문 京郷新聞) on June 6, 1977. It says that a female Korean prostitution broker trafficked dozens of Korean comfort women to Rabaul, Papua New Guinea to provide sex to Japanese soldiers there during World War II. It was common knowledge in South Korea until 1970's that Korean prostitution brokers recruited Korean comfort women and operated comfort stations, and no South Koreans contested that notion. Then Asahi Shimbun published a series of fabricated articles in 1980's falsely accusing Japanese military of abducting Korean comfort women. South Korean left (= North Korea) thought this was a great opportunity to discredit Japan and block reconciliation between Japan and South Korea. So it formed the anti-Japan lobby Chong Dae Hyup in 1990 and created the comfort women issue.

모든 뒷거래는 「관훈동요정」에서 이뤄져

[illegible]

1977.6.6 京郷日報

(*9) The photo below shows the relationship between the anti-Japan lobby Chong Dae

Hyup (Korean Council for the Women Drafted for Military Sexual Slavery by Japan) and North Korea.



Asahi Shimbun (left-wing Japanese newspaper with close ties to North Korea) published a series of fabricated articles on comfort women in 1980's. Based on these articles, the anti-Japan lobby Chong Dae Hyup was formed in South Korea in 1990. Then out of nowhere a woman named Kim Hak-sun came forward in 1991 and claimed she was abducted by Japanese military. There is clear evidence (recorded tapes) that suggests she was coached by Chong Dae Hyup to give false testimony. If Korean women were indeed abducted by Japanese military, it is rather odd that not a single woman claimed anything for over 45 years after the end of World War II. Former South Korean President Roh Tae-woo said in 1993 interview with Bungeishunju, "Asahi Shimbun created the comfort women issue out of nothing, provoked Korean nationalism and infuriated Korean people."

It is ironic that 99% of Westerners fell for Chong Dae Hyup's (North Korean) propaganda and believe 200,000 young girls including Koreans were coerced by

Japanese military while the majority of South Korean scholars (Professor Park Yuha of Sejong University, Professor Lee Yong-hoon of Seoul University, Professor Ahn Byong-jik of Seoul University, Professor Jun Bong-gwan of Korea Advanced Institute of Science and Technology, Professor Han Sung-jo of Korea University, Professor Lee Dae-gun of Sungkyunkwan University, Professor Choi Kei-ho of Kaya University, Professor Oh Seon-hwa of Takushoku University, Professor Chunghee Sarah Soh of San Francisco State University, etc.) and a good number of South Korean public agree that **Japanese military did not coerce Korean women** and that the number of women (Dutch and Filipino) coerced by Japanese military was less than a hundred. Westerners must realize that **North Korean and Chinese operatives are using the comfort women issue to drive a wedge into U.S.-Japan-South Korea security partnership.**

Posted by Pursuit of Truth Institute at 12:15 PM 1 comment:

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October 24, 2014

"The Comfort Women" by Professor C. Sarah Soh

Professor Chunghee Sarah Soh was born in South Korea and graduated from Sogang University there. She received her Ph.D. in anthropology from University of Hawaii. She is a professor of anthropology at San Francisco State University.



Professor Chunghee Sarah Soh

Professor Chunghee Sarah Soh's book "The Comfort Women" is available on Amazon.
<http://www.amazon.com/The-Comfort-Women-Postcolonial-Sexuality/dp/0226767779>

The following is an excellent book review.

<http://www.japantimes.co.jp/culture/2009/05/10/books/book-reviews/continuing-controversy-of-comfort-women/#.VLzLMpX9mcx>

In this book, Professor Soh criticizes the South Korean activist group "Korean Council" (also known as Chong Dae Hyup) for spreading North Korean propaganda and using the comfort women issue to block reconciliation between Japan and South Korea. She insists that Korean society must repudiate victimization, admit its complicity and accept that the system was not criminal. She also argues that the case of a small number of Dutch and Filipino women who were coerced by lower ranked Japanese soldiers in the battlefields was an anomaly, and that most women (Japanese, Korean and Taiwanese) were recruited and employed by prostitution brokers.

The following is an excerpt from her book "The Comfort Women." (Pages 10 - 11)

By 1920 some Korean women had become "overseas prostitutes." Those who worked at a restaurant in Sapporo, Japan, became what Yun Chŏng-ok calls "industrial comfort women," serving Korean men who worked there.⁴³ When the adult entertainment business in Korea suffered as a result of the Great Depression of the 1920s, female workers and business owners migrated to China. By the late 1920s the capital of colonial Korea, Kyŏngsŏng, was home to four pleasure quarters, which employed a total of 4,295 prostitutes.⁴⁴ By the mid-1930s 45 percent of Koreans had become infected with syphilis, compared to 15 percent of the French.⁴⁵ Beginning in the early 1930s many Korean women were sold overseas to labor as prostitutes. *Dong-a Ilbo*, one of Korea's major daily newspapers dating from the colonial days, reported on December 2, 1932, that about a hundred women a month were sold for 40 to 50 wŏn to brothels in Osaka, Hokkaido, Sakhalin, and Taiwan; this report, in hindsight, seems to predict the large-scale mobilization of Korean women to serve the troops through the 1930s up to 1945. In fact, the survivors' testimonials amply illustrate that during the war Korean men and women actively collaborated in the recruitment of young compatriots to service the Japanese military and also ran comfort stations. For young, uneducated women from impoverished families in colonial Korea, to be a victim of trafficking became "an ordinary misfortune" in the 1930s.⁴⁶ Amid widespread complicity and indifference to young women's plight, the adult entertainment business in Korea began to recover after the start of the Second Sino-Japanese War in 1937, and it flourished until early 1940.

When the war effort intensified in the early 1940s, however, many adult entertainment establishments had to close down, and by 1943 it was practically impossible to run such a business. This encouraged some brothel owners to seek their fortune abroad, including in Taiwan and occupied territories in the Southeast Asia. As Song Youn-ok noted, had there not been a "widespread network of traffic in women used in the state-managed prostitution system, the mobilization of Korean comfort women would have been a very different process."⁴⁷ Under grinding poverty, working-class families in colonial Korea sold unmarried daughters for 400–500 wŏn for a contractual period of four to seven years. The parents received 60–70 percent of the money after various expenses involved in the transaction had been deducted, such as the mediator's fee, clothing, document preparation, transport, and pocket money.⁴⁸ Kim Sun-ok, who labored at a comfort station in Manchuria for four years, recalled:

I had no childhood. I was sold four times from the age of seven. As soon as I returned to my home in P'yŏngyang from Sinŭi after nav-

In this excerpt it says, "By 1920 some Korean women had become overseas prostitutes. Beginning in the early 1930's many Korean women were sold overseas to labor as prostitutes. Dong-a-Ilbo, one of Korea's major daily newspapers dating from the colonial days, reported on December 2, 1932, that about a hundred women a month were sold to brothels in Osaka, Hokkaido, Sakhalin and Taiwan; this report predicted the large-scale mobilization of Korean women to serve the troops through the 1930's up to 1945. In fact, survivors' testimonials amply illustrate that during the war Korean men and women actively collaborated in the recruitment of young compatriots to serve the Japanese military and also ran comfort stations." In an interview with Professor Chunghee Sarah Soh of San Francisco State University, a former Korean comfort woman Kim Sun-ok said that she was sold by her parents four times.

Yet she testified in front of UN interrogator Radhika Coomaraswamy that she was abducted by Japanese military.



Kim Sun-ok

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In an interview with Professor Park Yuha of Sejong University in South Korea, a former Korean comfort woman Bae Chun-hee said that she hated her father who sold her.

Yet she testified in front of UN interrogator Radhika Coomaraswamy that she was abducted by Japanese military.

Bae Chun-hee

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A former Korean comfort woman Mun Oku-chu said in her memoir:

"I was recruited by a Korean prostitution broker. I saved a considerable amount of money."

According to Professor Chunghee Sarah Soh's book, Mun Oku-chu continued to work as a prostitute in Korea after the war.

Yet she testified in front of UN interrogator Radhika Coomaraswamy that she was abducted by Japanese military.



Mun Ok-chu



In an interview with Korean newspaper The Hankyoreh (the article was published on May 15th, 1991) a former Korean comfort woman Kim Hak-sun said that she was sold by her mother.

In an interview with Professor Chunghee Sarah Soh of San Francisco State University, Kim Hak-sun said that her mother sent her to train as a Geisha in Pyongyang before she sold her.

Yet she testified in front of UN interrogator Radhika Coomaraswamy that she was abducted by Japanese military.



Kim Hak-sun

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In an interview with Professor Ahn Byong Jik of Seoul University, a former Korean comfort woman Kim Gun-ja said that she was sold by her adoptive father.

Yet she testified in front of UN interrogator Radhika Coomaraswamy that she was abducted by Japanese military.

Kim Gun-ja also testified in front of United States House Committee on Foreign Affairs in 2007 and said she was abducted by Japanese military.



Kim Gun-ja

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In an interview with Professor Ahn Byong Jik of Seoul University, a former Korean comfort woman Lee Yong-soo said that she and her friend Kim Pun-sun were recruited by a Korean prostitution broker.

In an interview with Professor Chunghee Sarah Soh of San Francisco State University, Lee Yong-soo said, "At the time I was shabbily dressed and wretched. On the day I left home with my friend Pun-sun without telling my mother, I was wearing a black skirt, a cotton shirt and wooden clogs on my feet. You don't know how pleased I was when I received a red dress and a pair of leather shoes from a Korean recruiter."

Yet she testified in front of UN interrogator Radhika Coomaraswamy that she was abducted by Japanese military.

Lee Yong-soo also testified in front of United States House Committee on Foreign Affairs in 2007. She was told that she had five minutes to speak. She ignored the instruction and went on for over one hour putting on a performance of crying and screaming. Her false testimony resulted in the passage of United States House of Representatives House Resolution 121.



Lee Yong-soo

◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇

In an interview with Professor Ahn Byong Jik of Seoul University, a former Korean comfort woman Kim Ok-sil said that she was sold by her father.

In an interview with Professor Chunghee Sarah Soh of San Francisco State University, Kim Ok-sil said that her father sent her to train as a Geisha in Pyongyang before he sold her.

Yet she testified in front of UN interrogator Radhika Coomaraswamy that she was abducted by Japanese military.

◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇

In an interview with Professor Ahn Byong Jik of Seoul University, a former Korean comfort woman Kil Won-ok said that she was sold by her parents.

In an interview with Professor Chunghee Sarah Soh of San Francisco State University, Kil Won-ok said that her parents sent her to train as a Geisha in Pyongyang before they sold her.

Yet she testified in front of UN interrogator Radhika Coomaraswamy that she was abducted by Japanese military.



Kil Won-ok

◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇

Several people had witnessed the scenes in which Chong Dae Hyup (anti-Japan lobby) coached women to say "I was abducted by Japanese military."

Professor Ahn Byong Jik of Seoul University who interviewed former Korean comfort women says, "When I first interviewed them, none of them had anything bad to say about Japanese military. In fact they all reminisced the good times they had with Japanese soldiers. But after Chong Dae Hyup confined them, their testimonies had completely changed."

◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇

Korean women were not abducted by Japanese military because the Korean Peninsula was not the battlefield and therefore Japanese military was **NOT** in Korea. (Korean prostitution brokers recruited Korean women in Korea and operated comfort stations in the battlefields) Japan apologized and compensated, and Netherlands, Indonesia, the Philippines and Taiwan had all accepted Japan's apology and reconciled with Japan. So there are no comfort women issues between those nations and Japan. The comfort women issue remains only with South Korea because Chong Dae Hyup refuses to accept Japan's apology and continues to spread the false claim of "200,000 young girls including Koreans were abducted by Japanese military" throughout the world.

Posted by [Pursuit of Truth Institute](#) at 10:30 PM [No comments:](#)
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October 23, 2014

What Is Behind South Korea's Criticism On Comfort Women Issue

The following is a summary English translation of Professor James E. Auer's op-ed in Sankei Shimbun on October 22, 2014. Dr. Auer is an emeritus professor of international relations and public policy at Vanderbilt University.

The original post: <http://www.sankei.com/column/news/141022/clm1410220001-n1.html>



Professor James E. Auer

It is not surprising that China criticizes Japan because China is under Communist Party dictatorship. But why did South Korea begin to criticize Japan in the 1990's? and insists Japan's apology and compensation were not enough.

When the allied forces prosecuted war criminals, the comfort women system never became an issue because the U.S. military reports concluded with testimonies from Korean women that they either volunteered or were sold by their parents to Korean prostitution brokers.

Let us verify some facts.

1) Past and present, there were/are women who got/get into prostitution unwillingly. But prostitution is not slavery.

2) The comfort women system was not illegal in Japan's eyes in 1930's, and the allied forces didn't think it was illegal, either.

3) Korean government established comfort women system for U.S. troops in 1970's. Koreans for some reason think coercion and confinement took place in Japan's system but not in Korea's system.

4) If Japanese government or people tried to get facts out, the international community would perceive that effort as revisionism.

5) In August, **Asahi Shimbun published retraction articles admitting it falsely reported on abduction in Jeju Island. Asahi also admitted it mistook factory workers for comfort women, which inflated the number of comfort women.** Many Westerners praised Asahi for admitting its mistakes. However, what they failed to realize was Asahi told more lies in its retraction articles, which infuriated Japanese public. Westerners mistook mainstream Japanese's disgust toward Asahi for right wing's bashing on Asahi.

When Japan apologized for what it did during the war, its sincerity was backed by 50 odd years of good behavior.

In 1998, South Korean president Kim Dae-jung accepted apology from Japan's Prime Minister Keizo Obuchi and promised South Korea would never bring up the comfort women issue again. But subsequent Korean presidents have annulled Kim's gesture and used nationalism to bolster their low approval ratings.

Footnote: The following is a U.S. military report. Under 'Recruiting' this report misrepresents ethnic Korean agents and house masters using Japanese surnames as Japanese agents and house masters. (Ethnic Koreans were Japanese citizens at the time, so in that sense they were Japanese)

<http://ww2db.com/doc.php?q=130>

The following is excerpts from Korean comfort woman Mun Oku-chu's memoir. Her memoir is consistent with the U.S. military report.

<http://scholarsinenglish.blogspot.jp/2014/10/former-korean-comfort-woman-mun-oku.html>

Posted by Pursuit of Truth Institute at 8:37 AM No comments:
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October 19, 2014

◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇ ◇

October 18, 2014

"Comfort Women of the Empire" Reviewed by Professor Jun BongGwan

The following is a summary English translation of Professor Jun BongGwan's review of the book "Comfort Women of the Empire." Dr. Jun is a professor of Korean Literature at Korea Advanced Institute of Science and Technology. The review was published on July 20, 2014 in Korea's leading newspaper ChosunIlbo. The original article is shown at the

bottom.



Professor Jun BongGwan

After reading the book, I was a little bit disappointed because there was nothing in the book that I didn't know. We all knew that Korean comfort women were not coercively taken away by Japanese military. Japanese military commissioned Korean prostitution brokers to recruit women in the Korean Peninsula and operate comfort stations in the battlefields. Japanese military was busy fighting all over Asia, and it certainly didn't have time to be in Korea recruiting women.

Posted by [Pursuit of Truth Institute](#) at [11:47 PM](#) [No comments:](#)
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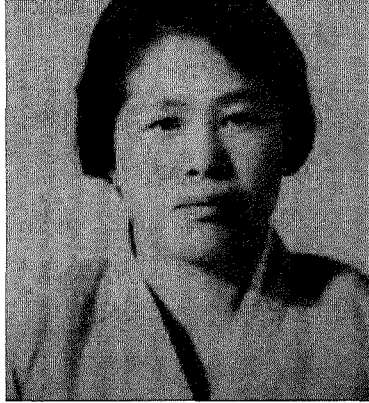
October 17, 2014

Posted by [Pursuit of Truth Institute](#) at [12:32 PM](#) [No comments:](#)
[Email This](#)[Blog This!](#)[Share to Twitter](#)[Share to Facebook](#)[Share to Pinterest](#)

October 16, 2014

Former Korean Comfort Woman Mun Oku-chu's Memoir The following is a English transaltion of excerpts from a former Korean comfort woman Mun Oku-chu's memoir.

The original memoir: <http://goo.gl/sI8Ett>



Ms. Mun Oku-chu

Posted by [Pursuit of Truth Institute](#) at 4:16 AM No comments:

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From: Board of Supervisors, (BOS)
To: BOS-Supervisors; Calvillo, Angela (BOS); Ausberry, Andrea; Caldeira, Rick (BOS)
Subject: FW: Comment re: Legislation 150790
Attachments: TSFLetter-SFBCWSFLC.pdf

From: Tyler Frisbee [mailto:tyler@sfbike.org]
Sent: Tuesday, September 01, 2015 1:47 PM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Cc: Nicole Ferrara <nicole@walksf.org>; Tom Radulovich <tom@livablecity.org>
Subject: Comment re: Legislation 150790

To Whom It May Concern:

Please find attached comments from the San Francisco Bicycle Coalition, Walk San Francisco, and Livable City regarding the proposed Transportation Sustainability Fee.

Thank you,

Tyler Emilie Frisbee
Policy Director, San Francisco Bicycle Coalition
(415) 431-BIKE (2453) x313
833 Market Street, 10th Floor
San Francisco, CA 94103
+++++

Biking is the Best Way to Get Around SF!
TAKE A FREE CLASS AND GET ROLLING
+++++



Board of Supervisors
City of San Francisco
1 Dr. Carleton B. Goodlett Place, Room 244
San Francisco, CA 94102

Re: Transportation Sustainability Fee Legislation

September 1, 2015

Dear San Francisco Board of Supervisors:

We are strong supporters of the principles behind the proposed Transportation Sustainability Fee (TSF), and are thrilled to finally see the city move forward with a way to ensure that new developments, both commercial and market-rate housing, help pay for the increased transportation needs they create. As anyone who lives in San Francisco can attest, our transportation system is over-subscribed, under-maintained, and often leaves people with few reliable, safe, convenient options. We are pleased that the Transportation Sustainability Fee reflects the City's goals to increase the number of people walking, biking, and taking transit, and believe that continued investment in our systems needs to reflect the City's ambitious goals. Transportation is the second highest expense for San Francisco residents (second to housing), and we need to ensure that we are providing safe, affordable, convenient options for residents in order to help them stay and get around in our beautiful city.

As the proposal moves forward, there are a few key policy changes to strengthen and better align the ordinance with the City's goals. To that end, we have three suggestions we urge the Board of Supervisors, the San Francisco Planning Department, the San Francisco Municipal Transportation Agency, and other stakeholders to implement.

1. Impact Fee Rates and Waivers

The current legislation proposes a residential rate of \$7.74 per square foot, far below the maximum justified fee level of \$30.39 identified in the first nexus study. While we understand the suggestions set forth in the Economic Feasibility study, \$7.74 per square foot is far too low given the needs of our transportation system and the significant impact new developments have on our transportation system, as demonstrated in the nexus study. For far too long, the City has not asked developers to pay their fair share, resulting in unreliable service, and inadequate system for all users and ultimately a huge economic burden for San Francisco residents and community members. The need to increase the TSF is particularly critical given that other development impact fees are being lowered as part of this legislation. We urge you to implement the \$30.93 residential fee (per square foot), \$87.42 nonresidential fee (per square foot), and \$26.07 for production, distribution and repair use (per square foot), commensurate with the true cost that development has on our transportation system, as outlined in the SFMTA's own transportation sustainability study.

We applaud the City's decision to apply TSF to market-rate housing as well as commercial development. The TSF appropriately waives residential fees for affordable housing. We are concerned, however, about the new definition of affordable housing as 150% of Area Median Income (AMI). Given the bifurcated economic nature of our city, 150% of AMI is a six-figure income; and using it as the new standard has significant policy impacts. This change, which based on the current language in the TSF legislation would apply to all development impact fees, should be reviewed on its own, if it will apply to development impact fees outside of the TSF. We understand that the City is currently adjusting the language to ensure that the 150% AMI only applies to TSF projects, and encourage the City to move forward with that change as well as further examining the impacts of the change to 150% AMI as a standard.

2. Charging for Parking

The amount of parking in a project is one of the most effective ways to influence travel behavior. However, parking square footage is not included in the current fee structure. The goal of the TSP is not only for developers to pay for their transportation impacts, it's also to build the infrastructure needed to meet the City's mode-shift goals. It is concerning that one of the most obvious facilitators of vehicle use will not be included in the current fee.

The TSP is intended to be both a transportation funding tool and a transportation planning tool. To be an effective transportation planning tool, the TSP must be able to accurately predict the transportation impacts of projects, and to reduce or mitigate any negative impacts on the transportation system and the environment.

Development projects can greatly reduce the environmental and infrastructure costs they impose on the City by reducing their dependence on private autos. However, the transportation planning models that the City uses to calculate auto trips and our impact fee structure can't currently distinguish between projects that minimize transportation impacts through strategies like smart locations, reduced parking, transit passes, enhanced walking and cycling access, and those that don't. We are concerned that the TSF as proposed continues to ignore the disparate impact that projects' transportation choices have on the transportation system. Space dedicated to parking generates auto trips, yet it is not counted as part of the gross floor area of a development (either residential or commercial), unless it is a stand-alone parking garage. Auto trips are the most expensive trips for our city's transportation network, and given the clear link between parking availability and auto trip generation, space dedicated to parking should be included as part of a development's square footage. Building space dedicated to parking can be included in the fee calculations by a simple amendment to the Planning Code - either amending Section 102 include parking as part of Gross Floor Area, or amending Article 4 to say that parking area counts

towards Gross Floor Area only for the purpose of calculating transportation impact fees.

As the City grows denser, it must refine its models for auto trip generation and vehicle miles travelled to more accurately account for the impact that residential and commercial parking spaces have on our transportation system and environment.

3. Investing in the System Should be Transparent and Strategic

To foster equity, health, sustainability, and mobility as the city grows, San Francisco must invest in sustainable transportation networks that are safe, continuous and citywide - safe streets for walking, a bicycle network, a transit-priority network, and a rapid transit network. TSP investments must be strategic, building towards a coherent whole. At the same time, the impacts of development on SF communities can be acute and challenging. To foster neighborhood livability, investments must also take into consideration community needs and neighborhood scale planning. **We recommend that the TSP include a transparent, community-based process for neighborhood level investments that are responsive and timely as neighborhoods grow and change.**

Over the last decade, the City has adopted various Area Plans - Better Neighborhoods, Eastern Neighborhoods, Rincon Hill, Transit Center District, etc. Those area plans rezoned land to encourage new housing and jobs. The plans also acknowledged that land use and transportation are two sides of the same coin, and accommodating new growth requires investments in sustainable transportation to maintain or improve mobility and neighborhood livability. The current ordinance prioritizes funding for projects approved in local Area Plans. However, there is no specific percentage of the TSF dedicated to providing essential transportation improvements within the Area Plan as development occurs. **We urge the City to set aside a portion of the TSF funding to implement Area Plans in which significant development is occurring so that transportation infrastructure keeps pace with the growth in housing and jobs. In communities that lack Area Plans, we urge the City to engage the community in a transparent process to identify and fund neighborhood transportation infrastructure priorities.** Improvements to walking and cycling are central to most of the Area transportation plans, and as part of this process, the City should look at the modal funding allocations included in the Area Plans, which frequently fund biking and walking infrastructure at higher levels than the TSF Nexus suggests, and use the Area Plan priorities to guide additional allocations.

The transportation and streetscape plans for the city's Area Plans vary greatly in their currency and completeness. Area Plans will be most useful to both Area Plan residents and the City as a whole when they are up to date, and integrate the City's other policy goals, including modeshift, carbon emission, and Vision Zero, as well as plans for citywide networks, including

the Bicycle Network, transit-priority network, pedestrian network, and Green Connections. Where Area Plans identify specific streetscape standards or improvements, The Planning Code requires that large development projects install them; incorporating streetscape plans into Area Plans can leverage these requirements into more walkable and livable neighborhoods. We encourage the city to update its neighborhood transportation and streetscape plans on a periodic basis, to allow them to serve as an accurate guide for neighborhood transportation priorities.

We appreciate the work that has gone into the Transportation Sustainability Fee thus far, and urge the City to move swiftly to implement the fee, and its related Transportation Demand Management tools. The TSF is an opportunity for San Francisco to lay the groundwork for a city in which residents and visitors alike can navigate safely, quickly, and comfortably through the City in low-carbon, healthy, and efficient ways, and is critical to aligning our funding and policy goals. We hope that you consider these recommendations as ways to further strengthen the program and better align it with existing city policy.

Sincerely,



Noah Budnick
San Francisco Bicycle Coalition



Tom Radulovich
Livable City



Nicole Ferrara
Walk San Francisco

CC: San Francisco Municipal Transportation Agency Board, San Francisco Municipal Transportation Agency Director Ed Reiskin, San Francisco Planning Commission, San Francisco Planning Department Director John Rahaim

From: Board of Supervisors, (BOS)
To: BOS-Supervisors
Subject: FW: SFPOA Proposed Racial Profiling KCBS Radio Message
Attachments: KCBS Racial Profiling Message.pdf

From: OFJ Officers For Justice [mailto:ofj2009@hotmail.com]
Sent: Sunday, September 06, 2015 10:09 PM
Subject: SFPOA Proposed Racial Profiling KCBS Radio Message

I am sorry I negated to attach the letter. Please find the attached electronic copy of a letter from the Officers For Justice Peace Officers' Association regarding the San Francisco Police Officers Association's proposed public service announcement for airing on KCBS Radio. Pursuant to the SFPOA's email blast message forwarded to SFPOA members dated Monday, August 31, 2015, we listened to the following proposed radio spot: [Click this link to hear the spot which will begin airing in a couple of weeks](#). As suggested we shared this proposed radio message with members of our community, including several community leaders.

We strongly disagree with the contents in this public service announcement. Please read our response letter to the SFPOA about concerns raised also by members in our community. We look forward to speaking with you about this sensitive matter and its potential ramifications.

Sincerely,

Yulanda D.A. Williams
President,
Officers For Justice Peace Officers' Association
Office: (415) 822-2225
Cellular: (415) 254-9846

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OFFICERS FOR JUSTICE

PEACE OFFICERS' ASSOCIATION

5126 Third Street, San Francisco, CA 94124

P.O. BOX 24068, San Francisco, CA 94124

TELEPHONE: (415) 822-2225 * FAX: (415) 822-2357

Website: www.officersforjustice.org Email: ofj2009@hotmail.com

September 6, 2015

San Francisco Police Officers Association
Mr. Martin Halloran, President
800 Bryant Street
San Francisco, California 94103

Dear Martin Halloran,

I am writing you regarding the August 31, 2015, KCBS "Racial Profiling" radio message recorded by Mr. Gary Delagnes (SFPD, Retired).

Even the President of the United States, Barack Obama, acknowledges the distrust that exists between many police departments and communities, particularly among young people of color. The San Francisco Police Department is no exception; young people and minorities find it hard to trust those of us who work the streets. Trust is established over time and cannot be forced upon people. I took the time to play this SFPOA message to various members of the OFJ and some community members during a meeting. They were not receptive to this message and, frankly, I must admit that I agree with them.

Mr. Gary Delagnes' message being publicized is brash, callous, overbearing and inaccurate. The selected words, voice and dialogue comes across as telling the community what they need to know as an indisputable "matter of fact." It demonstrates a lack of experience in conferring with minorities, reflects denial of any responsibility for strained relationships with members of the black and brown communities; this verbiage will continue to lead to additional misunderstandings.

To make this type of statement I trust you have conducted surveys from the various communities throughout this city. If not, your conclusion is based on conjecture, which has a tendency to be unfounded or faulty. It would be better to engage the communities we serve in respectable, constructive language to facilitate and enhance positive communication. This message could be expressed to the citizens by stating that we aspire to work collectively with the community in addressing the topic of systemic racism instead of blatantly declaring that it does not exist within the SFPD.

Perhaps a racial profiling message should be delivered by an active member, preferably by a member of color. We should be informing the community that there have been some negative and embarrassing situations that involved misconduct and inappropriate racist comments and actions. The SFPOA, along with several other minority police unions

representing the members of the San Francisco Police Department, such as the oldest minority union (OFJ), are doing everything we can to correct this to establish better relationship with them. This message should be delivered as a PSA on local SF TV channels instead of a radio message. When the community can see you, they watch and listen attentively.

Stating that systemic racism does not exist is simply not true, and the community knows this. If we are to be transparent about this issue, the first step is to embrace the fact and show that we are moving in a positive direction in order to correct this perceived problem. Offering to work with the community instead of just trying to push the message Mr. Delagnes is delivering would be in the best interest of the POA, OFJ, APOA, LPOA, SF PRIDE, WPOA and the SFPD.

Marty, I urge you to reconsider airing this message, for I think that the damage it will cause will put us all in a harsher situation than we are already facing. The majority of the OFJ members are also dual members with the San Francisco Police Officers Association. Maybe in the future before using funds for continued public service announcements, the SFPOA could request station representatives to gather input and suggestions from the members and consider seeking additional from the SFPOA members for these expenditures.

We must work side by side to resolve inequities, not justify wrongdoings of some police officers. Our best resolution to our current situation should be to take a more holistic approach.

Sincerely,



Yulanda D. Williams

President,

Officers For Justice Peace Officers Association

yw/sh

/file

cc: The Honorable Edwin Lee, Mayor
The Honorable London Breed, President, San Francisco of Board of Supervisors
San Francisco Police Chief Gregory P. Suhr
President Suzy Loftus and Members, the San Francisco Police Commission
Joyce M. Hicks, Executive Director of Office of Citizens Complaint
Dr. Amos Brown, President, the San Francisco Chapter NAACP

"Unless you stand for something, you will fall for anything"
Life member NAACP

BOS 11
Cpages

From: Patricia Van Steenberge <sfpv1945@gmail.com>
Sent: Thursday, September 03, 2015 9:39 AM
To: Board of Supervisors, (BOS)
Subject: disappearing blue spots

I have noticed the disable parking spaces have vanished from the top of Bernal Heights Boulevard and down at the bottom entrance too. Several of my neighbors find it difficult to walk up to get to the paved road. I just don't understand this. Now the dog walkers have an extra place to park and disabled people have been denied access to even a short walk outside.

From: Board of Supervisors, (BOS)
To: BOS-Supervisors
Subject: FW: ban on live animal performance

From: Elaine Ervolino [mailto:animalsr4evr@optonline.net]
Sent: Tuesday, September 01, 2015 1:29 PM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Subject: ban on live animal performance

Congratulations for your compassion and banning elephants and all wild/exotic animals from performing in SF. I always considered SF the best city in the world and hopefully your actions will encourage other states to follow. CA banned the use of bull hooks which is such great news to hear hope it's enforced. I have undercover DVD's of Ringling's training practices to get these elephants to perform. It's so heartbreaking I can't get through the entire DVD. The beatings, torture, abuse, even a person without full mental capacity would break down in tears. Thank you San Francisco. Elaine

To: BOS-Supervisors
Subject: JAMES WUNDERMAN APPOINTED TO WETA BOARD OF DIRECTORS
Attachments: SF BAY FERRY WUNDERMAN.pdf

Dear Supervisors:

We received a phone call from the Honorable Governor Jerry Brown's Office, announcing the appointment of Jim Wunderman to the Water Emergency Transportation Authority (WETA) Board of Directors on August 31, 2015. For more information, visit <http://www.watertransit.org/>

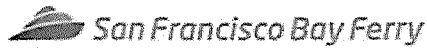
Regards,

Rachel Gosiengfiao
Executive Assistant
Board of Supervisors
1 Dr. Carlton B. Goodlett Place, City Hall, Room 244
San Francisco, CA 94102-4689
Phone: (415) 554-7703 | Fax: (415) 554-5163
rachel.gosiengfiao@sfgov.org | www.sfbos.org

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August 31, 2015

JAMES WUNDERMAN APPOINTED TO WETA BOARD OF DIRECTORS

San Francisco, CA (August 31, 2015)—Governor Jerry Brown appointed James Wunderman to the Water Emergency Transportation Authority (WETA) Board of Directors today. This position requires Senate confirmation.

Mr. Wunderman has been the President and CEO of the Bay Area Council since 2004. He was senior vice president of external affairs at Provident Financial Corporation from 1997 to 2004, chief of staff in the office of the Mayor of San Francisco from 1993 to 1995, and vice president and general manager at Norcal Waste Systems, Inc. from 1987 to 1991.

"We are excited to welcome Jim Wunderman to the WETA Board of Directors," said Nina Rannells, WETA Executive Director. "As CEO of the Bay Area Council for the past 11 years, Jim's expertise will be tremendously valuable as WETA continues to identify and implement solutions to enhance ferry service in the Bay Area, which ultimately benefits businesses and employees."

Mr. Wunderman is a visiting professor at the UC Davis Graduate School of Management, teaching a course in Executive Leadership. He is a graduate of San Francisco State University, majoring in political science, and received an Associate's Degree in Business Administration from Kingsborough College, City University of New York. Mr. Wunderman resides in Contra Costa County with his wife, Kristina. He has four children.

Media inquiries please contact:

Ernest Sanchez, sanchez@watertransit.org, 510.289.2530

Mackenzie Communications, jen@mackenziesf.com, p. 415.403.0800, c. 650.296.0626

###

About San Francisco Bay Ferry

San Francisco Bay Ferry is a service of the Water Emergency Transportation Authority (WETA). SF Bay Ferry serves the San Francisco Ferry Building and Pier 41/Fisherman's Wharf, South San Francisco, Alameda Main Street, Harbor Bay, Oakland Jack London Square and Vallejo, along with seasonal service to AT&T Park.

From: Board of Supervisors, (BOS)
To: BOS-Supervisors
Subject: FW: Let the People know.

From: James Corrigan [mailto:seamus37@icloud.com]
Sent: Thursday, September 03, 2015 10:13 AM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Subject: Let the People know.

Dear Members of the Board of Supervisors:

Why do City Officials, including yourselves, keep it a secret that the ground floor bathrooms of 44 San Francisco Fire Houses

are Public Restrooms between the hours of 9 A.M. and 6 P.M. every day of the year?

We have a problem in the City and utilization of this bathroom access could only help to diminish the size of the problem we are facing

and stepping into.

Please promulgate this. It is the very least you could do.

Jim Corrigan

For Emergencies Only: SF's Secret Public Bathrooms

By Chris Roberts @cbloggyWednesday, Sep 2 2015

Comments



For function-obsessed scribes at the *Chronicle*, 2015 has been the summer of shit.

Since August 1, the newspaper has published at least eight articles decrying the human effluvia on our city's streets. As San Francisco prepares to pretty itself to host Super Bowl fans, there are more public poopers and pissers than ever, declared the outraged paper.

Much blame has been assigned to the city's estimated 6,800 homeless — most of whom, as many a leg-crossing tourist on a fruitless quest for a Starbucks has discovered, have nowhere else to go. Public bathrooms are in such short supply that the city now wheels out temporary portable bathrooms to hotspots like Sixth Street. But it turns out there are as many as 45 under-utilized public bathrooms in San Francisco — at each of the city's fire stations.

Ground-floor restrooms at fire stations are public restrooms, available between 9 a.m. and 6 p.m. (unless there's a fire, in which case the bathroom is closed, no matter how dire the other emergency).

One would think this could help stem the tide of urine that's drowning us (and caused one corroded light pole to collapse).

The problem is that nobody seems aware the bathrooms are available.

"Nobody on our staff had heard about it," says Jennifer Friedenbach, the Coalition on Homelessness's Executive Director.

"The city should put the word out that they're available."

This could be because even the firefighters themselves don't know their station bathrooms are public pissoirs. *SF Weekly* was alerted to the situation only by the vigilance of Michael Petrelis, a controversial Castro District blogger and activist (who was once served a restraining order for photographing a politician in a City Hall public restroom). And Petrelis was only made aware of the policy after he received a July 30 SFFD memo via the Fire Commission, where he'd been raising a stink about increasing public access to meetings.

When Petrelis put the policy to the test at his local fire station, the firefighters there were unaware of the public access rule, but happily escorted him to the toilet, he reported on his blog.

This covertness could be by design. SFFD policy also allows firefighters to deny access to anyone who appears inebriated. That would rule out imbibing revelers. It could also rule out a fair number of the city's homeless, many of whom suffer from addiction — in other words, the people most in need would find the fire station bathrooms off limits.

Which means it's back to the streets — and watching where you step.

From: Board of Supervisors, (BOS)
To: BOS-Supervisors
Subject: FW: Critical Mass Mayhem

From: John Chiao [mailto:jtcdds@gmail.com]
Sent: Tuesday, September 01, 2015 8:53 AM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Subject: Critical Mass Mayhem

I am a resident of Russian Hill and I have already sent a message to Mark Farrell, my supervisor, but I also want the full board to hear what I, as a resident of San Francisco, have to say about the insane city policy of allowing Critical Mass to literally take over San Francisco on the last Friday of every month.

As someone who grew up in San Francisco and a bicyclists, I am appalled at the initial response by the police that nothing was going to be done about the attack on the Zip car by a rogue Critical Mass participant just because no police report was filed! Are you serious??? What kind of town is SF becoming??!! When OBVIOUS LAWLESSNESS is being committed, the police will just sit on their asses and do nothing? Will they do nothing if someone is shot and no police report is filed also? Yes, I know that an investigation is now going to be done but as an after thought? How utterly insane and stupid is that?

I also think SF is insane for not controlling the Critical Mass ride on the last Friday of every month. That is nothing more than allowing mayhem to take over the streets of San Francisco and putting some drivers in potential harm by some participants who obviously like to flaunt the law. I had at one time thought of riding my bike with Critical Mass but when I saw that they were mostly hooligans just inching for confrontation, I avoid them like the plague. Critical Mass encourages mob mentality and should be controlled and if the city's budget does not allow that, THEN BAN such behavior!

I grew up in San Francisco, seeing the passing of the beatniks in North Beach, the hippies and Flower Children in the Haight-Ashbury, and the Summer of Love, so I am fairly tolerant, but this monthly Critical Mass ride upsets me to no end. This is nothing more than condoning hooligan behavior and lawlessness by the police.

John T Chiao, DDS (ret)
District 2 resident

From: Board of Supervisors, (BOS)
To: BOS-Supervisors
Subject: FW: Disturbing Bike Confrontation and Lack of Police Action

From: Carl Rashad Jaeger [mailto:carlrjaeger@gmail.com]

Sent: Monday, August 31, 2015 6:29 PM

To: Lee, Mayor (MYR) <mayoredwinlee@sfgov.org>; BreedStaff, (BOS) <breedstaff@sfgov.org>; Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>; mark.farrell@sf.gov

Subject: Disturbing Bike Confrontation and Lack of Police Action

Dear Mayor Lee, Supervisor Mark Farrell and London Breed,

This story and video just come to my attention a few minutes ago. I am an avid bicycle rider, for commuting and for fun, but I cannot condone this behavior.

Clearly when a car or bike crosses purposefully into traffic and confronts a motorist, this is against the traffic laws, and perhaps some other laws. This kind of behavior causes terror to the people who experience it.

I live on Scott Street (at Haight) along the wiggle. I love the many cyclists that ride in my neighborhood, and I want them to follow the law and be respectful.

The offending cyclists should indeed be prosecuted.

<http://ww2.kqed.org/news/2015/08/31/video-confrontation-between-critical-mass-bicyclist-and-driver-in-s-f>

With all that I have on my plate, I do not have time to follow this. As someone who has adopted two foster kids from the city with special needs, I have a lot to do. BUT, I don't want to worry about their safety from unchecked cyclists.

What are the next steps? Can someone get back to me to let me know if the cyclists will be prosecuted?

Carl

Carl Rashad Jaeger
Jaegerfilms.com
415.505.2275

From: Board of Supervisors, (BOS)
To: BOS-Supervisors
Subject: FW: Bicycles

From: Mardonus D [mailto:mardonus2@yahoo.com]
Sent: Monday, August 31, 2015 11:09 PM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Subject: Bicycles

I saw the news tonight about the bikes riding the wrong direction and confronted a car / driver. Very upsetting to watch sure a thing like this but gave me an idea I would like to pass on to you

If you can pass a law somehow to make every bicycle be register just like a car and a small lic plate must be on the bike under the seat.

Cars pay road taxes bikes don't.

Taxes would help get them a place on the roads just like car taxes / gas taxes etc. The road was made and paid for through taxes yes, but it takes a lot of money to redo these roads now for the bikes to be in a safe place.

Also I have seen them on TV running stop sign/ red lights. They must pay the price also for breaking the laws of the road made by the people.

Same fines must apply to them with the SAME fines. A stop sign is a stop sign for all moving transportation , so the fine should not be any less than a car.

I know you can have police also on bikes of some kind to ticket those who break the laws.

Remember cars have high registration and and motorcycles are less than cars. Therefore Bicycles could pay the same as a motorcycle .

Now because motorcycles also pay insurance to be on the road so should the bicycle. They do damage too to things and people. Most bikes are covered under home insurance. They maybe need to be covered by a bond with the city as many rent with no insurance of any kind. At least pay insurance and carry proof of it like a motorcycle.

Being on the road with the same rights could happen if they pay their own way the same as others.

It would take some time to get something like this going but it could work.

Money would come into your city and improvements could better the roads for the bikers.

No more free ride for bikes.

Pay a road tax every year.

Obey the laws.

Care proof of insurance etc.....

I just had to get this off my chest. They do not own the roads. We the motorist do. We pay much more than they do in so many ways.

Thank you for listening to an outsider.

P.S. I hate driving in SF in the first place. :)