The Visitacion Valley Planning Alliance with broad support from neighbors, environmentalists, & educators requests an appeal of the Planning Commission's 1/18/18 decision RE: 590 Leland Ave. - church demolition permit: 2014046067762 & building permits: 201404254159, 201404254158, 201404254157, 20140454 201404254152. Case Number 2014.0936E

Primary reasons for requesting appeal:

1. <u>Inaccurate and incomplete biological resources review</u>: Planning's consultant could not find a locally rare plant very near the site and did not acknowledge existence of rare habitat across the street on RPD property. On Feb. 10, 2018, our volunteer consultant found both inside 30 minutes. We have photographs.

2. Inaccurate and incomplete analysis of loss of vista from public open space.

 Inaccurate and incomplete analysis of <u>interference with sightlines</u> within portions of local parts of McLaren Park, a possible <u>safety</u> issue for local school children and seniors.
Inaccurate and incomplete analysis of loss of flat ADA accessible open space.
Inaccurate and incomplete analysis of effect of <u>shadows</u> on planned pathway and native plant landscaping to be constructed by RPD along the north and west boundaries of the site. In general, incomplete analysis of interactions with other public improvements projects, planned or under construction, on adjoining RPD property.
Incomplete analysis of the possibility that all or part of the site, which is on RPD's Acquisition Roster, might have more value as <u>open space</u> in a <u>high needs</u> neighborhood, which has welcomed high density housing, than as the site of 5 three story houses. This is a social, environmental & aesthetic justice issue.

Submitted for Visitacion Valley Planning Alliance by Fran Martin, Fran Martin.



VISITACION VALLEY PLANNING ALLIANCE

Working for a Better Community 1999-2018

February 19, 2018

RE: Appeal of Case Number 2014.9036E

Board of Supervisors, Clerk of the Board,

I have included the original material from our Request for Discretionary Review as the material in support of the Board of Supervisors Appeal. It was unclear to us, if this is what is required. We would be happy to add other supplemental material, if needed.

Thank you

Fran Martin

Fran Martin

Visitacion Valley Planning Alliance 415-216-8560 fma6764860@aol.com



SAN FRANCISCO **PLANNING DEPARTMENT** SAN FRANCISCO

Certificate of Determination² 20 PH 2:20 Exemption from Environmental Review

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

Case No.:	2014.0936E
Project Title:	590 Leland Avenue
Zoning:	RH-1 (Residential-House, One Family) Use District
	40-X Height and Bulk District
Block/Lot:	6243/019
Lot Size:	15,659 square feet
Project Sponsor:	Victor Quan - (415) 531-8311
	Vquan.sf@gmail.com
Staff Contact:	Melinda Hue – (415) 575-9041
	Melinda.Hue@sfgov.org

Reception: 415.558.6378

Fax: 415.558.6409

Planning Information: 415.558.6377

PROJECT DESCRIPTION:

The subject property is located on a block bound by Raymond Avenue to the north, Leland Avenue to the south, and Visitacion Avenue to the west, adjacent to John McLaren Park and community garden, in the Visitacion Valley neighborhood. The project site includes an existing 8,416 square-foot church (built in 1954) that is currently occupied by two different congregations and a small non-profit organization. The *(continued on the next page)*

EXEMPT STATUS:

Categorical Exemption, Class 32 (California Environmental Quality Act (CEQA) Guidelines Section 15332)

REMARKS:

See next page.

DETERMINATION:

I do hereby/certify that the above determination has been made pursuant to State and local requirements.

Sarah B. Jones

Environmental Review Officer

<u>February 12, 2015</u> Date

cc: Victor Quan, Project Sponsor Aaron Hollister, Current Planner Allison Vanderslice, Preservation Planner Supervisor Malia Cohen, District 10 (via Clerk of the Board) Historic Preservation Distribution List Virna Byrd, M.D.F.

PROJECT DESCRIPTION (continued):

proposed project would involve: 1) demolition of the existing building on the project site; 2) subdivision of the existing 15,659 square-foot lot into five individual lots ranging from 2,500 to 4,599 square feet; and 3) construction of five new single-family homes, one on each lot.

The five new buildings would be three stories, approximately 30 to 33 feet tall, and would range in size from approximately 3,200 to 4,200 square feet (three 6-bedroom residences, one 5-bedroom residence, and one 4-bedroom residence). Two of the residences would have frontage along Leland Avenue while three of the residences would have frontage along Raymond Avenue. Each residence would have a garage that would accommodate two off-street parking spaces. The sidewalk along Raymond Avenue would be extended along the project site frontage and three new curb cuts would be installed. Two new curb cuts would be installed along Leland Avenue. The project would involve the excavation of up to two feet below ground surface (bgs) and approximately 48 cubic yards of soil disturbance/excavation to accommodate the new buildings.

Project Approvals

The proposed project would be subject to notification under Section 311 of the Planning Code and would require the issuance of a building permit by the Department of Building Inspection (DBI).

Approval Action: If discretionary review before the Planning Commission is requested, the discretionary review hearing is the Approval Action for the project. If no discretionary review is requested, the issuance of a building permit by DBI is the Approval Action. The Approval Action date establishes the start of the 30-day appeal period for this CEQA exemption determination pursuant to Section 31.04(h) of the San Francisco Administrative Code.

REMARKS:

California Environmental Quality Act (CEQA) State Guidelines Section 15332, or Class 32, provides an exemption from environmental review for in-fill development projects which meet the following conditions:

a) The project is consistent with applicable general plan designations and policies as well as with applicable zoning designations.

The San Francisco General Plan, which provides general policies and objectives to guide land use decisions, contains some policies that relate to physical environmental issues. The proposed project would not obviously or substantially conflict with any such policy, and would be consistent with the San Francisco General Plan and with applicable zoning designations. The project site is located in an area characterized by single-family uses with park and school uses nearby. Existing single-family homes along Leland Avenue and Raymond Avenue are two to three stories tall. The project site is located within the RH-1 use district, where the proposed single-family use is permitted. Additionally the proposed project would include construction of structures up to 30 to 33 feet tall and thus would not exceed the project site's 40-X height and

bulk limit. Thus, the size and use of the proposed project are consistent with the project site's zoning designation. The proposed project would be consistent with all other applicable policies and standards associated with the project site's existing General Plan and zoning designations.

b) The development occurs within city limits on a site of less than five acres surrounded by urban uses.

The approximately 0.4-acre (15,659-square-foot) project site is located within a fully developed area of San Francisco. The surrounding area consists mainly of residential uses with school and park uses nearby. Thus, the proposed project would be properly characterized as infill development surrounded by urban uses on a site of less than five acres.

c) The project site has no habitat for endangered, rare or threatened species.

The project site is within a developed urban area and contains an existing building. The open space on the northern portion of the project site supports ruderal vegetation. While the project site is adjacent to John McLaren Park, it is adjacent to portions of the park that has been developed to include Visitacion Avenue with roadside ruderal vegetation and a community garden. No contiguous and substantial habitat for any rare or endangered plant or animal species is located on or adjacent to the project site.

d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

<u>Traffic.</u> The proposed project would involve the demolition of a church and the construction of five new single-family homes. Based on the trip rate for residential use in the Planning Department's Transportation Impact Analysis Guidelines for Environmental Review (Guidelines) (October 2002), the proposed project would generate an estimated 50 average daily person-trips, of which there would be about nine p.m. peak hour person trips (generally between 4:30 to 6:30 p.m.). These peak hour trips would be distributed among various modes of transportation, including five automobile person-trips and three transit trips.¹

The proposed project is estimated to generate approximately five p.m. peak hour vehicle trips. This change in traffic during the p.m peak hour in the project area generated by the proposed project would be undetectable to most drivers, although it could be noticeable to those immediately adjacent to the project site. The proposed project is estimated to generate two p.m. peak hour vehicle trips along Leland Avenue and three p.m. peak hour vehicle trips along Raymond Avenue, a negligible increase in traffic relative to the existing capacity of the

¹ San Francisco Planning Department. *Transportation Calculations for 590 Leland Ave*, December 2014. This document is on file and available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400 as part of Case File No. 2014.0936E.

surrounding street system. And although the proposed project would increase in the number of vehicles in the project vicinity, this increase would not substantially affect pedestrian travel and safety in the area. During the 12 month overall construction period, there would be an increase in truck traffic near the project site. Due to their temporary and limited duration, construction-related impacts on traffic generally would not be considered significant. Thus, the proposed project would not have any significant traffic effects.

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

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

The proposed project meets each of the above three criteria and thus, this certificate does not consider parking in determining the significance of project impacts under CEQA.² The Planning Department acknowledges that parking conditions may be of interest to the public and the decision makers. Therefore, the parking demand analysis is provided for informational purposes. Using the Guidelines, the proposed project would create an estimated demand for eight off-street vehicle parking spaces. Based on the 10 off-street vehicle parking spaces that would be provided by the project, the demand for off-street parking would be met.

Noise. An approximate doubling of traffic volumes in the area would be necessary to produce an increase in ambient noise levels discernable to most people. The proposed project would not cause a doubling in traffic volumes. Therefore, project operations would not result in a substantial increase in the ambient noise level at the project vicinity and this would be a less-than-significant impact. Although some increase in noise would be associated with the construction phase of the project, such occurrences would be limited to certain hours of the day and would be intermittent and temporary in nature. Construction noise is regulated by the San Francisco Noise Ordinance (Article 29 of the City Police Code). Section 2907 of the Police Code requires that noise levels from individual pieces of construction equipment, other than impact tools, not exceed 80 A-weighted decibels (dBA) at a distance of 100 feet from the source. Impact tools (such as jackhammers and impact wrenches) must have both intake and exhaust muffled to the satisfaction of the Director of Public Works. Section 2908 of the Police Code prohibits construction work between 8:00 p.m. and 7:00 a.m. if the construction noise level would exceed the ambient noise level by five dBA at the nearest property, unless a special permit is authorized by the Director of Public Works or the Director of Building Inspection. The project sponsor would

² San Francisco Planning Department. SB 743 Transit-Oriented Infill Project Eligibility Checklist for 590 Leland Avenue, December 18, 2014. This document is on file and available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400 as part of Case File No. 2014.0936E

be required to comply with these measures; therefore the project would not result in any significant effects related to noise.

Air Quality. In accordance with the state and federal Clean Air Acts, air pollutant standards are identified for the following six criteria air pollutants: ozone, carbon monoxide (CO), particulate matter (PM), nitrogen dioxide (NO2), sulfur dioxide (SO2) and lead. These air pollutants are termed criteria air pollutants because they are regulated by developing specific public healthand welfare-based criteria as the basis for setting permissible levels. The Bay Area Air Quality Management District (BAAQMD) has established thresholds of significance to determine if projects would violate an air quality standard, contribute substantially to an air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants within the San Francisco Bay Area Air Basin. To assist lead agencies, the BAAQMD, in their CEQA Air Quality Guidelines (May 2011), has developed screening criteria. If a proposed project meets the screening criteria, then the project would result in less-than-significant criteria air pollutant impacts. A project that exceeds the screening criteria may require a detailed air quality assessment to determine whether criteria air pollutant emissions would exceed significance thresholds. The proposed project would not exceed criteria air pollutant screening levels for operation or construction.³

In addition to criteria air pollutants, individual projects may emit toxic air contaminants (TACs). TACs collectively refer to a diverse group of air pollutants that are capable of causing chronic (i.e., of long-duration) and acute (i.e., severe but of short-term) adverse effects to human health, including carcinogenic effects. In an effort to identify areas of San Francisco most adversely affected by sources of TACs, San Francisco partnered with the BAAQMD to inventory and assessed air pollution and exposures from mobile, stationary, and area sources within San Francisco. Areas with poor air quality, termed the "Air Pollutant Exposure Zone," was identified based on two health-protective criteria: (1) excess cancer risk from the contribution of emissions from all modeled sources greater than 100 per one million population, and/or (2) cumulative PM2.5 concentrations greater than 10 micrograms per cubic meter. Land use projects within the Air Pollutant Exposure Zone require special consideration to determine whether the project's activities would expose sensitive receptors to substantial air pollutant concentrations.

The proposed project is not within an Air Pollutant Exposure Zone. Therefore, the proposed project would result in a less than significant impact with respect to exposing sensitive receptors to substantial levels of air pollution. The proposed project would require construction activities for the approximate 12-month construction phase. However, construction emissions would be temporary and variable in nature and would not be expected to expose sensitive receptors to substantial air pollutants. Furthermore, the proposed project would be subject to, and comply with, California regulations limiting idling to no more than five minutes,⁴ which would further reduce nearby sensitive receptors' exposure to temporary and variable TAC emissions. Therefore,

³ Bay Area Air Quality Management District, CEQA Air Quality Guidelines, Updated May 2011. Table 3-1.

⁴ California Code of Regulations, Title 13, Division 3, § 2485.

construction period TAC emissions would result in a less than significant impact with respect to exposing sensitive receptors to substantial levels of air pollution.

For the reasons above, the proposed project would not result in any significant effects related to air quality.

<u>Water Quality.</u> The proposed project would not generate substantial wastewater or result in discharges that would have the potential to degrade water quality or contaminate a public water supply. Project-related wastewater and stormwater would flow to the City's combined sewer system and would be subject to the standards contained in the City's National Pollutant Discharge Elimination System (NPDES) Permit for the Southeast Water Pollution Control Plant prior to discharge. Therefore, the proposed project would not result in any significant impacts related to water quality.

e) The site can be adequately served by all required utilities and public services.

The project site is located in an urban area where all public services and facilities are available; no expansion of public services or utilities would be required.

Historic Architectural Resources. When evaluating whether the proposed project would be exempt from environmental review under CEQA, the Planning Department must first determine whether the subject property is a historical resource as defined by CEQA. In a Preservation Team Review Form, the Planning Department determined that the building at 590 Leland Avenue does not appear to be individually eligible for the California Register of Historic Resources (California Register) and thus is not a historical resource under CEQA.⁵

The subject building at 590 Leland Avenue was designed by Los Angeles-based architect J.A. Murrey in 1954 as the Saint Andrew's Evangelical Lutheran Church in the Visitacion Valley neighborhood. The subject building does not appear to be significant in the development of the neighborhood or with any other significant events or trends in the local area or San Francisco generally. Therefore, the subject property is not significant under Criterion 1 for designation in the California Register. Based on the Historic Resource Evaluation prepared by Tim Kelley,⁶ no significant persons are associated with the subject building. No information was found identifying Reverend John R. Pearson as a significant person. Thus, the subject property is not significant under Criterion 2.

The subject building is a vernacular, T-plan, two-story, stucco-clad building with a cross-gable roof and steeple. Limited ornamentation was noted on the interior and exterior of the building. The subject

⁵ San Francisco Planning Department. Preservation Team Review Form for 590 Leland Avenue, July 29, 2014. This document is on file and available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400 as part of Case File No. 2014.0936E

⁶ Tim Kelley Consulting. Part I Historical Resource Evaluation for 590 Leland Avenue, October 2013. This document is on file and available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400 as part of Case File No. 2014.0936E

property at 590 Leland Avenue is not a significant example of a type, period, or style. The architect J. A. Murrey is primarily known for his modern apartment buildings and supermarkets and he also designed the North Hollywood Masonic Temple. The subject property is not a significant example of his body of work. Therefore, the subject property is not significant under Criterion 3. Additionally, the subject building is not significant under Criterion 4, since this significance criterion typically applies to rare construction types when involving the built environment. The subject building is not an example of a rare construction type.

There is no historic district or eligible historic district identified in the project area. The surrounding residential neighborhood was primarily built during the 1950s and 1960s in the Contractor Modern style and the subject building does not appear to be significant example of this style or period. The proposed addition would therefore not result in a significant impact to historic resources.

Geology and Soils. The project site slopes downward towards the south with an average slope of 10 percent. A geotechnical investigation was prepared for the proposed project and includes information gathered from a reconnaissance of the site and surrounding vicinity, two soil test borings at a maximum depth of eight feet bgs, laboratory testing, and review of data pertinent to the project area.⁷ Soil borings at the subject site encountered clayey sand over silty sand, and sand with clay. Free groundwater was not encountered in the two borings.

The geotechnical report evaluated the project site for the potential for seismic surface ruptures, liquefaction, densification and landsliding and found these risks to be low. The site does not lie within a liquefaction potential zone or within an area of potential earthquake-induced landsliding as mapped by the California Division of Mines and Geology. The project site is in an area that would be exposed to strong ground shaking in the event of an earthquake. The project sponsor would be required to adhere to the San Francisco Building Code, which specifies seismic design parameters for the design of earthquake resistant structures and would minimize the potential for structural damage from earthquakes. The geotechnical report contains additional recommendations concerning site preparation and grading, foundation design (conventional spread footing foundation or mat foundation), design of retaining walls, slabs on grade, and site drainage. The geotechnical report concludes that the project site is suitable for the proposed project improvements with incorporation of the report recommendations.

Decisions about appropriate foundation and structural design are considered as part of DBI's permit review process. Prior to issuing a building permit for the proposed project, DBI would review the geotechnical report to ensure that the security and stability of adjoining properties and the subject property is maintained during and following project construction. Any potential damage to on-site structures from geologic hazards would be addressed through compliance with the San Francisco Building Code. The proposed project would therefore not result in a significant impact related to seismic and geologic hazards.

⁷ H. Allen Gruen. *Geotechnical Investigation for Planned Development at 590 Leland Avenue San Francisco California,* June 2014. This document is on file and available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400 as part of Case File No. 2014.0936E.

Shadow. Section 295 of the Planning Code was adopted in response to Proposition K (passed November 1984) in order to protect certain public open spaces under the jurisdiction of the Recreation and Park Commission from shadowing by new and altered structures during the period between one hour after sunrise and one hour before sunset, year round. Section 295 restricts new shadow upon public open spaces under the jurisdiction of the Recreation and Park Commission by any structure exceeding 40 feet in height unless the Planning Commission finds the shadow to be an insignificant effect. The proposed structures would be up to between 30 to 33 feet tall and would not be subject to Section 295. A preliminary shadow fan prepared by the Planning Department⁸ indicates that the proposed project has the potential to cast shadow on John McLaren Park. The park areas north and directly west of the project area consists of Visitation Avenue with roadside ruderal vegetation. Therefore, the proposed project would not result in shadow impacts on any recreational areas to the north or west of the project site. The park area southwest of the project site includes a community garden. The preliminary shadow fan indicates that the proposed project would have the potential to cast shadow on the northern portion of the community garden. However, the proposed project includes buildings that are 30 to 33 feet tall, which would be shorter than the existing 38-foot-tall building at the project site. Therefore, it is not anticipated that shadows on the community garden would substantially increase with the proposed project, and the proposed project would result in less-than-significant shadow impacts.

PUBLIC NOTICE AND COMMENT

A "Notification of Project Receiving Environmental Review" was mailed on October 6, 2014 to adjacent occupants and owners of properties within 300 feet of the project site. The Planning Department received comments in response to the notice. Concerns raised include increased traffic and associated increases in pedestrian hazards and air pollution, inadequate off-street parking, construction noise, and compatibility with the existing neighborhood character. Concerns and issues raised in the public comments on the environmental review are discussed in the corresponding topical sections of this Categorical Exemption. While local concerns or other planning considerations may be grounds for modifying or denying the proposed project, there is no substantial evidence that the proposed project could have a significant effect on the environment as addressed in this Categorical Exemption.

SUMMARY

CEQA State Guidelines Section 15300.2 states that a categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances. There are no unusual circumstances surrounding the current proposal that would suggest a reasonable possibility of a significant effect. The proposed project would have no significant environmental effects. The project would be exempt under the above-cited classification. For the above reasons, the proposed project is appropriately exempt from environmental review pursuant to Section 15332 of the CEQA Guidelines.

⁸ San Francisco Planning Department. Shadow Fan for590 Leland Avenue, November 21, 2014. This document is on file and available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400 as part of Case File No. 2014.0936E.

DISCRETIONARY REVIEW APPLICATION: Questions 1, 2 & 3

Question #1) Reasons for requesting DR. What are exceptional and extraordinary circumstances to justify DR? How does the project conflict with General Plan and Residential Guidelines? Be specific and cite specific sections of Residential Guidelines.

The exceptional and extraordinary circumstances for requesting a Discretionary Review are:

(1) The 590 Leland Avenue project proposes to construct 5 units of three story housing up to 3,500 SF in size, which would be totally incompatible with the existing neighborhood's housing and character.

Even more importantly,

(2) The project is also incompatible with proposed improvements to the adjacent McLaren Park open space. These include an outdoor education center to be incorporated in the strip of land connecting the Visitacion Valley Middle School to Hahn Avenue and Coffman Pool. The center will include a major entryway to McLaren Park, a community garden, a PUC Rain Garden, and a Native Plant Demonstration Garden showcasing <u>an existing rare bio-geographical sand dune</u> and plant life. The neighborhood also hopes to establish an Environmental Education Center with space for non-profit organizations.in the existing church building. As part of the current McLaren Park planning process this property is key to creating an opportunity for environmental education for City park users and the local population.

(3) In addition, the project would not serve the needs of the anticipated surge of new residents who will be living in the Schlage Lock, Sunnydale, and Executive Park developments, and who have a right to expect adequate accessibility to McLaren Park open space and park amenities. Today single use facilities at the Gleneagles golf course and proposed bike park take up the most beautiful and accessible land in the park areas next to Visitacion Valley. The rest of McLaren Park is too steep and blocked off to residents. The project would block such access.

(4) The project would also include demolishing a church that is one of only 3 churches left in the Valley. That church represents a link to our African American history -- in a neighborhood with a dearth of interesting architecture, to us, it is a landmark that defines the area and offers a sense of tranquility. For the future, it represents an opportunity to be adapted as a community asset for non-profits and environmental education. So for two different reasons, it will be a great loss to the community if that church is demolished.

SUMMARY: Given recently discovered information regarding the rare sand dune habitat, and its importance to biodiversity and as a wildlife habitat; given critical issues of social justice and accessibility to open space in a high needs area; and given the incompatibility between the proposed project and existing community planning and neighborhood character, we are requesting a Discretionary Review and an EIR leading to preserving the church and open space at the proposed 590 Leland Avenue project.

The ways in which 590 Leland Project conflicts with the General Plan are divided into 8 general categories, which will be addressed in fuller detail in Question #2. The supporting references from the <u>General Plan</u> sections - Recreation, Open Space Element (ROSE), Urban Design Elements and Environmental Protection Elements. In some cases there is overlapping with other categories.

1) Loss of view corridors from all angles

Supportive Elements in the GENERAL PLAN INTRODUCTION

Priority Policies: The San Francisco General Plan is designed as a guide to the attainment of the following general goals:

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

Recreation and Open Space Element

GUIDING PRINCIPLES FOR OPEN SPACE AND RECREATION

POLICY 1.10 Ensure that open space is safe and secure for the City's entire population. Safety and security in the City's open spaces is essential to allow San Franciscans to enjoy their community open spaces. Improving the design of an open space through design treatments can reduce the fear of crime and the actual level of crime. Design treatments can include:

Providing clear sightlines, where appropriate.

Urban Design Element

City Pattern:

OBJECTIVE 1; EMPHASIS OF THE CHARACTERISTIC PATTERN WHICH GIVES TO THE CITY AND ITS NEIGHBORHOODS AN IMAGE, A SENSE OF PURPOSE, AND A MEANS OF ORIENTATION.

...San Francisco has an image and character in its city pattern, which depend especially upon **views**, topography, streets, building form and major landscaping.

Opportunity for Recreation

POLICY 4.8 Provide convenient access to a variety of recreation opportunities.

...The more visible the recreation space is in each neighborhood, the more it will be appreciated and used.

...Recreation space at a greater distance should be easily accessible by marked driving routes, and where possible by separated walkways and bicycle paths. Larger recreation areas should be highly visible.

...Outlooks upon a pleasant and varied pattern provide for an extension of individual consciousness and personality, and give a comforting sense of living with the environment.

2) LOSS OF SUNLIGHT IN MCLAREN PARK FROM RAYMOND AVENUE TO LELAND AVENUE OF UP TO 50 – 75 FEET.

Supportive Elements in the GENERAL PLAN

Priority Policies:

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

Recreation and Open Space Element

OBJECTIVE 1:

ENSURE A WELL-MAINTAINED, HIGHLY UTILIZED, AND INTEGRATED OPEN SPACE SYSTEM PAGE 7

GUIDING PRINCIPLES FOR OPEN SPACE AND RECREATION

POLICY 1.9 Preserve sunlight in public open spaces.

Solar access to public open space should be protected. In San Francisco, presence of the sun's warming rays is essential to enjoying open space. Climatic factors, including ambient temperature, humidity, and wind, generally combine to create a comfortable climate only when direct sunlight is present. Therefore, the shadows created by new development nearby can critically diminish the utility and comfort of the open space.

3) NEIGHBORHOOD CHARACTER AND FUNCTION

A) Demolition of existing church and construction on open space will destroy character and cultural heritage of neighborhood

B) Oversized 3 story buildings on end of block next to park and community facilities in area of predominately 2 story homes

C) Loss of parking spaces for residents, gardeners working in expanded community garden, park users and staff at John King Senior Community

Supportive Elements in the GENERAL PLAN INTRODUCTION:

The San Francisco General Plan is designed as a guide to the attainment of the following general goals:

1) Protection, preservation, and enhancement of the economic, social, cultural, and esthetic values that establish the desirable quality and unique character of the city.

2) Improvement of the city as a place for living, by aiding in making it more healthful, safe, pleasant, and satisfying, ...by providing adequate open spaces and appropriate community facilities. *Priority Policies1:*

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

Recreation and Open Space Element

OBJECTIVE 1: ENSURE A WELL-MAINTAINED, HIGHLY UTILIZED, AND INTEGRATED OPEN SPACE SYSTEM

3) That landmarks and historic buildings be preserved;

POLICY 1.12 Preserve historic and <u>culturally significant landscapes</u>, <u>sites</u>, <u>structures</u>, buildings and objects.

Guiding Principles for Open Space and Recreation

2. SENSE OF PLACE. San Francisco is a regional epicenter for ecological, economic, and cultural diversity. Open spaces should aim to build on our City's intrinsic qualities, both natural and cultural, and to reflect the values we place on cultural diversity and biodiversity. Furthermore, they should create a network that inspires a deep connection to place.

URBAN DESIGN ELEMENT

City Pattern

OBJECTIVE 1: EMPHASIS OF THE CHARACTERISTIC PATTERN WHICH GIVES TO THE CITY AND ITS NEIGHBORHOODS AN IMAGE, A SENSE OF PURPOSE, AND A MEANS OF ORIENTATION.

...San Francisco has an image and character in its city pattern, which depend especially upon views, topography, streets, building form and major landscaping.

COMMENT (e): Open space that contains facilities desired by the residents, and that is designed when possible with local participation, is more likely to be used and cared for by local residents.

4- Open space and landscaping can give neighborhoods an identity, a visual focus and a center for activity. POLICY 4: Protect and promote large-scale landscaping and open space that defines districts and topography.

,,,Whatever steps are taken in the street areas, they may be lost in the changed atmosphere produced by new buildings.

CONSERVATION

OBJECTIVE 2: CONSERVATION OF RESOURCES WHICH PROVIDE A SENSE OF NATURE, CONTINUITY WITH THE PAST, AND FREEDOM FROM OVERCROWDING.

POLICY 4: ??? Preserve notable landmarks and areas of historic, architectural or aesthetic value, and promote the preservation of other buildings and features that provide continuity with past development. **POLICY 7:** Recognize and protect outstanding and unique areas that contribute in an extraordinary **degree to San Francisco's visual form and character.**

4) ENVIRONMENT

A) Proximity to future Community Garden, PUC Rain Garden.

B) Intrusion into existing public open space

C) Loss of sand dunes, biodiversity and habitat.

D) Narrows pathway area and visual and actual continuity of the existing parkland.

E) Proximity to proposed native plant demonstration garden

Supportive Elements in the GENERAL PLAN

Recreation and Open Space Element

OBJECTIVE 1

ENSURE A WELL-MAINTAINED, HIGHLY UTILIZED, AND INTEGRATED OPEN SPACE SYSTEM POLICY 1.1 Encourage the dynamic and flexible use of existing open spaces and promote a variety of recreation and open space uses, where appropriate.

POLICY 1.3 Preserve existing open space by restricting its conversion to other uses and limiting encroachment from other uses, assuring no loss of quantity or quality of open space.

POLICY 1.5 Prioritize the better utilization of <u>McLaren Park</u>, Ocean Beach, the Southeastern Waterfront and other underutilized significant open spaces.

Guiding Principles for Open Space and Recreation

4. CONNECTIVITY. San Francisco's network of open spaces should be wholly connected. The open space system should facilitate non-motorized movement, link diverse neighborhoods, be easy to navigate and understand and, where feasible, enhance habitat through **connectivity**.

5. HEALTH & SAFETY. Open space should increase the City's capacity to be a safe and healthy place to live. Its design should promote social interaction, wellness, and a healthy lifestyle by providing opportunities for physical, cultural and social activities, and a connection to nature.

6. ECOLOGICAL FUNCTION & INTEGRITY. With environmental sustainability as a driving theme, the quantity and quality of natural systems in the City should be preserved and expanded, by promoting aquatic and terrestrial biodiversity, by designing for watershed health, and by implementing environmental, ecological and conservation-minded strategies.

POLICY 1.10 Ensure that open space is safe and secure for the City's entire population.

Safety and security in the City's open spaces is essential to allow San Franciscans to enjoy their community open spaces. Improving the design of an open space through design treatments can reduce the fear of crime and the actual level of crime. Design treatments can include:

Providing clear sightlines, where appropriate.

Designing the street/open space interface to encourage permeability and access.

OBJECTIVE 3 IMPROVE ACCESS AND CONNECTIVITY TO OPEN SPACE

POLICY

3.6 Maintain, restore, expand and fund the urban forest.

OBJECTIVE 4. PROTECT AND ENHANCE THE BIODIVERSITY, HABITAT VALUE, AND ECOLOGICAL INTEGRITY OF OPEN SPACES AND ENCOURAGE SUSTAINABLE PRACTICES IN THE DESIGN AND MANAGEMENT OF OUR OPEN SPACE SYSTEM.

...Maintaining biodiversity requires genetic diversity, species diversity, and habitat diversity. San)Francisco can be a leader in creating new and more sustain- able open spaces by ensuring that all open spaces, including new and renovated park spaces, are developed in a way that enhances and works with local biodiversity.

POLICY 4.1 Preserve, protect and restore local biodiversity. ...Yet San Francisco continues to lose species diversity due to isolation and fragmentation of habitats and invasive species.The City should employ appropriate management practices to maintain a healthy and resilient ecosystem, which preserves and protects plant and wildlife habitat, especially rare species which are the primary contributors to local biodiversity.

POLICY 4.2 Establish a coordinated management approach for designation and protection of natural areas and watershed lands.

POLICY 4.3 Integrate the protection and restoration of local biodiversity into open space construction, renovation, management and maintenance.

The following criteria should be used to determine what constitutes a significant natural resource area worthy of protection:

The site is undeveloped and relatively undisturbed, and is a <u>remnant of the original natural</u> landscape and either supports a significant, diverse, or unusual indigenous plant or wildlife habitat, or contains rare geological formations, or riparian zones.

The site contains rare, threatened, or endangered species, as identified by the U.S. Fish and Wildlife Service or California Department of Fish and Wildlife, or contains habitat that has recently supported and is likely again to support rare, threatened, or endangered species.

<u>The site is adjacent to another protected natural resource area and, if protected from</u> <u>development, the two areas together would support a larger or more diverse natural habitat.</u>

...(if) an area is at risk of loss through development, the site should be examined as a candidate for open space acquisition. Relative importance of the site as a natural area should also be assessed.

ENVIRONMENTAL PROTECTION ELEMENT

OBJECTIVE 1 ACHIEVE A PROPER BALANCE AMONG THE CONSERVATION, UTILIZATION, AND DEVELOPMENT OF SAN FRANCISCO'S NATURAL RESOURCES.

...San Francisco is fortunate in that it is not entirely developed and has some rather outstanding natural resources remaining. Those remaining resources should be protected from further encroachment and enhanced ...increasing the supply of natural resources.

POLICY 1.1 Conserve and protect the natural resources of San Francisco. A major thrust of science and technology in the oncoming years must be that of making cities more livable places by offsetting the imbalance between the natural and man-made environments. Man and his technology must become a more interrelated part of nature and not an exploiter of the physical environment.

San Francisco must assure that its remaining natural resources are protected from misuse. ... The most important uses of existing resources should be those which provide maximum benefits for public use while preserving and protecting the natural character of the environment.

POLICY 1.3 Restore and replenish the supply of natural resources.

...Undoing past mistakes must also be a major part of comprehensive environmental action. In this regard, San Francisco should undertake projects to acquire or create open space, cultivate more vegetation, encouraged and receive top priority. With major efforts in this direction, the City will help reverse past trends toward the destruction of the natural qualities of the environment.

POLICY 1.4 Assure that all new development meets strict environmental quality standards and recognizes human needs.

In reviewing all proposed development for probable environmental impact, careful attention should be paid to upholding high environmental quality standards. ... **Development projects, therefore, should not disrupt natural or ecological balance, degrade the visual character of natural areas, or otherwise** conflict with the objectives and policies of the General Plan.

POLICY 2.2 Promote citizen action as a means of voluntarily conserving natural resources and improving environmental quality

.**POLICY 2.3** Provide environmental education programs to increase public understanding and appreciation of our natural surroundings.

... If we are to preserve and enhance the quality of our surroundings, we must cherish their values. Environmental education programs promoting an understanding and appreciation of our natural systems serve to expand public awareness of environmental problems and man's place in the world.

Land

OBJECTIVE 7: ASSURE THAT THE LAND RESOURCES IN SAN FRANCISCO ARE USED IN WAYS THAT BOTH RESPECT AND PRESERVE THE NATURAL VALUES OF THE LAND AND SERVE THE BEST INTERESTS OF ALL THE CITY'S CITIZENS.

...Just as important as development, however, is the protection of remaining open space to preserve the natural features of the land that form such a striking contrast with the city's compact urban development. In exercising land use controls over development and in preserving permanent open space, the land should be treated as a valuable resource to be carefully allocated in ways that enhance the quality of urban life.

Flora and Fauna

OBJECTIVE 8: ENSURE THE PROTECTION OF PLANT AND ANIMAL LIFE IN THE CITY.

...A totally manufactured environment without plants and animals would be sterile. That bit of nature which still remains in San Francisco is a precious asset. The ecological balance of wildlife and plant communities should be protected against further encroachments.

POLICY 8.2 Protect the habitats of known plant and animal species that require a relatively natural environment... Other parks and undeveloped areas in San Francisco remain relatively undisturbed and provide a variety of environments for flora and fauna: beaches, <u>sand dunes</u>, wooded areas, open fields, grassy hills, and lakes. All these areas should be protected. **POLICY 8.3** Protect rare and endangered species.

Urban Design Element

Conservation

OBJECTIVE 2 : CONSERVATION OF RESOURCES, WHICH PROVIDE A SENSE OF NATURE, CONTINUITY WITH THE PAST, AND FREEDOM FROM OVERCROWDING.

POLICY 1: Preserve in their natural state the few remaining areas that have not been developed by man. **OBJECTIVE 2 : DEVELOP AND MAINTAIN A DIVERSIFIED AND BALANCED CITYWIDE SYSTEM OF HIGH QUALITY PUBLIC OPEN SPACE**

OBJECTIVE 4 : PROVIDE OPPORTUNIUES FOR RECREATION AND THE ENJOYMENT OF OPEN SPACE IN EVERY SAN FRANCISCO NEIGHBORHOOD.

POLICY 1: Provide an adequate total quantity and equitable distribution of public open spaces throughout the City.

590 Leland Avenue Project includes 586, 596 Leland & 579, 583, 589 Raymond CASE # 2014.0936E

POLICY 4: Acquire and develop new public open space in existing residential neighborhoods, giving priority to areas, which are most deficient in open space.

POLICY 6 : Assure the provision of adequate public open space to **serve new residential development**. **OBJECTIVE 6**: TO PROVIDE A QUALITY LIVING ENVIRONMENT.

City Pattern:

Outlooks upon a pleasant and varied pattern provide for an extension of individual consciousness and personality, and give a comforting sense of living with the environment.

5) ACCESSIBILITY

A) Primary entryway into McLaren Park from Visitacion Valley and new developments east of Bayshore Boulevard.

B) Loss of flat <u>ADA accessible</u> space behind church on Raymond Avenue for nearby Senior Housing residents and general public

C) Overall lack of accessible parkland in Visitacion Valley

Supportive Elements in the GENERAL PLAN Recreation and Open Space Element

OBJECTIVE 2

INCREASE RECREATION AND OPEN SPACE TO MEET THE LONG-TERM NEEDS OF THE CITY AND BAY REGION

In an urban area, the most critical factor in the provision of open space is its distribution. All types of open space activity - from sports fields to playgrounds - should be accessible to and within walking distance of every resident of the City. Walking distance, however, ranges depending on the type of activity and the resident.

... Even in neighborhoods that have open spaces within walking distance, higher density and lower income populations may mean demand in these areas exceeds the capacity of local open spaces. As these communities continue to grow, open space improvements and acquisition are needed to maintain access to this limited resource.

This objective, and the policies that follow, are aimed at addressing these deficiencies through new or improved open space provision.

POLICY 2.2 Provide and promote a balanced recreation system which offers a variety of high quality recreational opportunities for all San Franciscans.

The City's goal is to ensure that all San Franciscans are within a reasonable walk from an open space with a range of active and passive recreational opportunities. To ensure the highest quality of recreational opportunities for its residents, the City must be able to respond to changing demographics, neighborhood demand, and emerging recreational trends as it plans for new or expanded recreation and open space. The recreation system should provide an equitable distribution of facilities and services and consistent hours of operation. It should also provide sufficient opportunities for populations who are frequent users of open space, such as seniors and children.

POLICY 2.3 Provide recreational programs that are responsive to community needs and changing demographics.

In 2010, SFRPD implemented a new recreation system that focuses on flexibility and responsiveness to changes within communities by providing appropriate programming based on community interest and demand. To stay up-to-date with current needs and interests, RPD routinely surveys their recreation program users. The results provide RPD with information to ensure that programs and services meet the existing needs of neighborhood residents and are on the cutting edge of emerging trends.

OBJECTIVE 3: IMPROVE ACCESS AND CONNECTIVITY TO OPEN SPACE

POLICY 3.1 Creatively develop existing publicly-

owned right-of-ways and streets into open space.

POLICY 3.4 Encourage non-auto modes of

transportation – transit, bicycle and pedestrian access—to and from open spaces while reducing automobile traffic and parking in public open spaces.

POLICY 3.5 Ensure that, where feasible,

recreational facilities and open spaces are physically accessible, especially for those with limited mobility.

POLICY 3.6 Maintain, restore, expand and fund the urban forest. **OBJECTIVE 4:**

PROTECT AND ENHANCE THE BIODIVERSITY, HABITAT VALUE, AND ECOLOGICAL INTEGRITY OF OPEN SPACES AND ENCOURAGE SUSTAINABLE PRACTICES IN THE DESIGN AND MANAGEMENT OF OUR OPEN SPACE SYSTEM

Page 40

The City should ensure that recreational facilities and public open spaces are accessible to all San Franciscans, including persons with special recreational needs, where feasible. For example, the hilly topography of the City makes providing some paths ADA accessible difficult to achieve. People with special needs may include seniors, children (particularly the very young), and people with disabilities. In order to achieve this policy, park and recreation facilities should be planned and programmed for people with special recreational needs in mind. The following criteria should be followed when developing or renovating any new space:

All parks and open spaces should comply with applicable requirements of the Americans with Disabilities Act and the California Building Code.

The City should utilize the US Access Board's recreation facilities and outdoor area accessibility guidelines as a best practice for design and construction.

The City should also ensure that routes to and from the open spaces are accessible. For example, the route from the public transit stop to the park should be fully accessible.

Urban Design Element

City Pattern Opportunity for Recreation

POLICY 4.8 Provide convenient access to a variety of recreation opportunities. As many types of recreation space as possible should be provided in the city, in order to serve all age groups and interests. Some recreation space should be within walking distance of every dwelling, and in more densely developed areas some sitting and play space should be available in nearly every block. The more visible the recreation space is in each neighborhood, the more it will be appreciated and used. ...Recreation space at a greater distance should be easily accessible by marked driving routes, and where possible by separated walkways and bicycle paths. Larger recreation areas should be highly visible.

6) COMMUNITY PLANNING AND STEWARDSHIP

A) Current McLaren Park planning process, during which neighbors, educators and environmentalists are advocating creation of an Outdoor Education Center from the Visitacion Valley Middle School to Hahn Avenue

B) Empower community to help plan their neighborhood

Supportive Elements in the GENERAL PLAN

Recreation and Open Space Element

Guiding Principles for Open Space and Recreation

7. SUSTAINING STEWARDSHIP. San Francisco's community members should be actively engaged as participants in its future. Policies should work towards shared, continued stewardship that increases the tangible link between community members and their open space network. Partnerships between public agencies, private business, and community based non-profits, and individual members of the community to foster pride, purpose and community should continue to be developed.

OBJECTIVES AND POLICIES:

OBJECTIVE 1: ENSURE A WELL-MAINTAINED, HIGHLY UTILIZED, AND INTEGRATED OPEN SPACE SYSTEM

To ensure vibrant parks and open spaces the City should deploy a diverse range of opportunities, including the following options:

" Provide recreational opportunities, both active and passive, that respond to user demographics and emerging recreational needs.

" Include innovative community-driven uses such as food production, *education*, and improved streetscaping.

"Design open spaces that include both active programming and passive uses in tranquil spaces. " Provide programming for healthy and active lifestyles.

"Allow active engagement with natural areas through public access trails, wildlife observation, birding, and educational displays and programs.

" Increase cultural programming and activities based on neighborhood need and interest.

Guiding Principles for Open Space and Recreation

Provide spaces and structures that encourage unstructured natural play.

POLICY 1.5 *Prioritize the better utilization of McLaren Park,...* Development of the park should capitalize on the site's natural conditions, including topography, existing native vegetation, and views, in compliance with RPD guidelines. New plantings should be added to provide habitats and windbreaks, to define sub-areas of the park, and to provide colorful and attractive visual accents. Plant species should be hardy, wind- and fire-resistant, and provide for and enhance wildlife habitats. ... New recreation areas should serve active, as well as passive, non-organized recreation needs, that respond to a wide spectrum of park users.

Environmental Protection Element:

POLICY 2.3 Provide environmental education programs to increase public understanding and appreciation of our natural surroundings.

...If we are to preserve and enhance the quality of our surroundings, we must cherish their values. Environmental education programs promoting an understanding and appreciation of our natural systems serve to expand public awareness of environmental problems and man's place in the world.

7) SOCIAL JUSTICE AND EQUITY IN HIGH NEEDS AREA

Supportive Elements in the GENERAL PLAN Recreation and Open Space Element Introduction

Why Is Recreation and Open Space Important?

Public open spaces, whether playgrounds, picnic fields or even just engaging streets, can <u>help build</u> <u>community</u> by giving neighbors a realm in which to get to know each other, and giving children a safe place to play

Open space and recreation activities improve resident's physical and mental health.

Open space and recreation activities can help to <u>address environmental justice across a community</u>. Public recreation provides accessible and low cost opportunities to all San Franciscans, regardless of income level. High rates of childhood obesity and illness often correspond to fewer acres of usable open space. Provision of open space in areas with high concentrations of density, poverty, youth or <u>seniors can redress equity issues</u>. A clear example is how local food production increases access to fresh local produce and provides an opportunity for communities to connect with nature.

Guiding Principles for Open Space and Recreation

3. EQUITY & ACCESSIBILITY. Open space and recreational programs should be equitably distributed. They should provide access for all residents, workers and visitors, and work towards a democratic network that includes all neighborhoods.

Ensure a well-maintained, highly utilized, and integrated open space system.

OBJECTIVES AND POLICIES

POLICY 1.2 Prioritize renovation in highly-utilized open spaces and recreational facilities and in high needs areas. ...Renovation of resources also should be prioritized in "high needs areas," defined as areas with high population densities, high concentrations of seniors and youth, and lower income populations, that are located outside of existing park service areas

POLICY 1.11 Encourage private recreational facilities on private land that provide a community benefit, particularly to low and moderate-income residents

Some private and non-profit recreational facilities act in a quasi-public manner. These may provide free or low-cost community access, supplementing existing City programs in underserved communities for active education, sports and recreational activities.

OBJECTIVE 1

ENSURE A WELL-MAINTAINED, HIGHLY UTILIZED, AND INTEGRATED OPEN SPACE SYSTEM OBJECTIVE 2: INCREASE RECREATION AND OPEN SPACE TO MEET THE LONG-TERM NEEDS OF THE CITY AND BAY REGION

POLICY 2.1 Prioritize acquisition of open space in high needs areas.

POLICY 2.3 Provide recreational programs that are responsive to community needs and changing demographics.

POLICY 2.6 Support the development of civic- serving open spaces.

POLICY 2.7 Expand partnerships among open

space agencies, transit agencies, private sector and nonprofit institutions to acquire, develop and/or manage existing open spaces.

OBJECTIVE 5.

ENGAGE COMMUNITIES IN THE STEWARDSHIP OF THEIR RECREATION PROGRAMS AND OPEN SPACES

POLICY 5.1 Engage communities in the design, programming and improvement of their local open spaces, and in the development of recreational programs. ... The most successful public spaces are those that respond to the needs of their users. Statistics, maps and figures can only go so far in determining a community's need – they can explain proximity to open space, they can describe type of open spaces that are missing (hiking trails, sports fields, playgrounds, etc.), but they cannot identify the components of open space design, which will most reflect their user community.

Open space designs and improvement plans, recreational programs, partnerships for new concessions, and other park additions should always include community participation

...Community organizing around engaged urban revitalization, such as the creation of parks and open space, can have tangible social benefits too. It fosters a sense of responsibility, and encourages residents to take initiative in affecting their own environment. *Creation of a community space can support the coming together of a neighborhood,*

facilitating social interactions and further increasing participation in future planning efforts.

POLICY 5.3 Facilitate the development of

community-initiated or supported open spaces.

POLICY 5.4 Reduce governmental barriers to

community-initiated recreation and open space efforts.

POLICY 5.5 Encourage and foster stewardship of

open spaces through well-run, active volunteer programs.

OBJECTIVE 6.

SECURE LONG-TERM RESOURCES AND MANAGEMENT FOR OPEN SPACE ACQUISITION, AND RENOVATION, OPERATIONS, AND MAINTENANCE OF RECREATIONAL FACILITIES AND OPEN SPACE

POLICY 6.1 *Pursue and develop innovative*

long-term funding mechanisms for maintenance, operation, renovation and acquisition of open space and recreation.

Urban Design Element

CITY PATTERN

POLICY 2.3 Provide recreational programs that are responsive to community needs and changing demographics.

In 2010, SFRPD implemented a new recreation system that focuses on flexibility and responsiveness to changes within communities by providing appropriate programming based on community interest and demand. To stay up-to-date with current needs and interests, RPD routinely surveys their recreation program users. The results provide RPD with information to ensure that programs and services meet the existing needs of neighborhood residents and are on the cutting edge of emerging trends.

POLICY 4.7 Encourage and assist in voluntary programs for neighborhood improvement. ... Even in neighborhoods that have open spaces within walking distance, higher density and lower income populations may mean demand in these areas exceeds the capacity of local open spaces. As these communities continue to grow, open space improvements and acquisition are needed to maintain access to this limited resource.

...This objective, and the policies that follow, are aimed at addressing these deficiencies through new or improved open space provision.

8) NEED FOR ACQUISITION

Supportive Elements in the GENERAL PLAN

Recreation and Open Space Element

OBJECTIVE 2: INCREASE RECREATION AND OPEN SPACE TO MEET THE LONG-TERM NEEDS OF THE CITY AND BAY REGION

Priority for acquisition of new space to address open space inequities should be given to high need areas, defined as places where there is low access to open space (illustrated in Map 4: Walkability), a conglomeration of high density, high percentages of children, youth, seniors, and low income households (illustrated in Map

...The Acquisition Policy provides guidance to promote equitable recreational and open space opportunities through

several criteria: location in High Needs Areas, available funding sources that may be leveraged, interjurisdictional cooperation, and community support.

OBJECTIVE 6

SECURE LONG-TERM RESOURCES AND MANAGEMENT FOR OPEN SPACE ACQUISITION, AND RENOVATION, OPERATIONS, AND MAINTENANCE OF RECREATIONAL FACILITIES AND OPEN SPACE

POLICY 6.1 Pursue and develop innovative long-term funding mechanisms for maintenance, operation, renovation and acquisition of open space and recreation.

...Additionally, these agreements should:

- · Maintain and enhance public access to recreation and park services; and
- Maintain transparency and accountability to the public; and
- · Support the park or open space through financial and/ or physical improvements

Citywide Impact Fees to Fund Recreation Facilities and Open Space. Development impact fees are fees the City charges developers in connection with approval of a development project for the purpose of defraying all or a portion of new public facility needs related to the development. These fees can be used to acquire and develop new recreational facilities and open spaces and for capital improvements to existing open spaces. Development impact fees that provide revenue for recreation and open space are in effect in a number of City neighborhoods, but not citywide. The City has developed an initial nexus study to demonstrate the impact of new development on open

Environmental Protection Element

Land

OBJECTIVE 7: ASSURE THAT THE LAND RESOURCES IN SAN FRANCISCO ARE USED IN WAYS THAT BOTH RESPECT AND PRESERVE THE NATURAL VALUES OF THE LAND AND SERVE THE BEST INTERESTS OF ALL THE CITY'S CITIZENS.

POLICY 7.1 Preserve and add to public open space in accordance with the objectives and policies of the Recreation and Open Space Element.

...Given constraints on the City's financial resources, public acquisition for all natural areas that are in private ownership may not be an option. However, if such an area is at risk of loss through development, the site should be examined as a candidate for open space acquisition. Relative importance of the site as a natural area should also be assessed.

...**Undoing past mistakes must also be a major part of comprehensive environmental action.** In this regard, San Francisco should undertake projects to acquire or create open space, cultivate more vegetation, replenish wildlife, and landscape man-made surroundings. Projects revitalizing the urban environment should be encouraged and receive top priority. <u>With major efforts in this direction, the City will help reverse past trends toward the destruction of the natural qualities of the environment.</u> ...(if) an area is at risk of loss through development, the site should be examined as a candidate for open space acquisition. Relative importance of the site as a natural area should also be assessed.

QUESTION # 2:

The Residential Design Guidelines assume some impacts to be reasonable and expected as part of construction. Please explain how this project would cause unreasonable impacts. If you believe the property of others or the neighborhood would be adversely affected, please state who would be affected and how:

BACKGROUND

The *Visitacion Valley Greenway* and the *Visitacion Valley Planning Alliance (VVPA)* in partnership with various environmentalists, educators and community members are in agreement that the 590 Leland site should not have housing built on it, but rather should be preserved as open space. On July 7, 2015, the Park Recreation and Open Space Advisory Committee (PROSAC), after hearing numerous comments made by concerned neighborhood members, voted unanimously to place the parcel on the Recreation and Park Department's Acquisition Roster, and, separately, to recommend that the Recreation and Park Commission act to acquire the site. In addition many McLaren Park Collaborative members have expressed support for acquiring the site for public open space and environmental education.

The award winning *Visitacion Valley Greenway* has worked for over 20 years to beautify and green the neighborhood (200+ trees planted in the Valley with Friends of the Urban Forest), promote outdoor education with children and youth, maintain the Greenway, and provide a sense of unity.

Since 1999 the *Visitacion Valley Planning Alliance* has endeavored to help empower and educate the community to improve Visitacion Valley, which is one of the most neglected neighborhoods in San Francisco. As a result, among other accomplishments, VVPA has achieved the following:

• Created a community planning process, without City support at the beginning, that has resulted in the process of developing the Schlage Lock former brown field site as a TOD.

• Pursued a better design for our new library.

• Initiated the Visitacion Valley Developer's Infrastructure Fee and Executive Park Master Plan process with former Supervisor Maxwell

• Worked on Leland Avenue Streetscape Improvement Project, the San Bruno/Arleta/Bayshore intersection corner, the Plaza in front of Schlage Lock and Bayshore Caltrain Station design

The point is that VVPA has been in the forefront of Visitacion Valley community planning for over 17 years. We have supported high-density housing and initiated thoughtful, smart development to improve our historically underserved neighborhood.

It is clear that our community is not opposed to new housing. On the contrary, we embrace it, particularly when it best serves our community, the City and the environment.

However the proposed development at 590 Leland is not in the best public interest and will cause the loss of sensitive open space and the church building as a community resource, which will adversely affect our neighborhood forever.

This is the site of the last remaining African American Church in Visitiacion Valley. Furthermore, the community has already developed a vision for this site as an eco center and community space (See Question 3 for more details).

In the past few years Visitacion Valley residents have contended with a lack of services that are expected in other wealthier neighborhoods, coupled with an alarming trend to use our neighborhood for what is not desired in the rest of the City. The most egregious of these being:

Relocation of MTA facility and Auto Return to Visitacion Valley

• Plans to relocate Recology facilities from Pier 96 and 7th Street to an expanded facility in Visitacion Valley

• Redevelopment Agency dissolution, resulting in less community planning input and increase in number of housing units at Schlage Lock.

• Recent sale of Union Pacific Railroad property to a developer, with possible 200 additional housing units and loss of open space at Schlage Lock,

• Proposal to build a Caltrain Maintenance yard directly next door in Brisbane and Paralleling station at Schlage Lock

Specifically, there are 3 main interrelated issues and concomitant impacts that concern our community about the 590 Leland Avenue Development:

1) Environmental

According to Planning Department Policies the 590 Leland site proposal did not meet the threshold for an EIR. In fact, the project will have environmental impacts that would be considered insupportable in a larger project. There needs to be greater scrutiny due to the

Views

Views from the park of the Bay, Visitacion Valley and San Bruno Mountain would be destroyed by the proposed development of 5 three-story houses. Sight lines into the park from nearby streets would be eliminated. Lovely, irreplaceable views visible only from this area would be lost forever. (See photos).

Shadowing

Significant shadows created by the <u>existing</u> 2-story building at the end of Raymond Avenue extend 50 feet to the west in the 9 am morning sun. Earlier there would be an even longer shadow. The <u>proposed</u> three-story buildings would cast a 50 - 75 foot shadow (approximately) across the western length of the development from Raymond Avenue to Leland Avenue for a main portion of the day. The shadows would adversely affect the native plants on site. (See photo)

Loss of Open Space and Accessibility

Over the years the original McLaren Park footprint has lost over half its acreage to private housing and public entities, such as schools and public housing. The 590 Leland Avenue parcel was once part of McLaren Park. Historically, the public has considered the open space behind the church to be part of the park until it was discovered that the land had been sold to a private developer. The Recreation and Park Department has long maintained the site behind and beside the church believing it to be Recreation and Park open space.

590 Leland Avenue Project includes 586, 596 Leland & 579, 583, 589 Raymond CASE # 2014.0936E

The flow of parkland from Visitacion Valley Middle School to Hahn Avenue will be forever compromised and interrupted by the 590 Leland Avenue development. It will create a very narrow passage for the public trail next to Visitacion Avenue. There is a commitment by Rec/Park, the PUC and the community to improve this strip of land as witnessed by the various projects already begun – the community garden, PUC rain garden, improved open space to be landscaped with drought resistant and native trees and plants, trails and a major entryway to McLaren Park in an area lacking accessibility to the park. The 590 Leland project will ruin what has been underway for some time. (See photo)

Proximity to Public Open Space and Bio-geographical Importance

The 590 Leland site is directly adjacent to a Recreation and Park open space. According to the General Plan, the site should be preserved and protected as part of the larger public open space. Most importantly, Dr. Michael Vasey, SFSU Department of Biology and Director, SF Bay NERR, among many scholarly accomplishments, has identified the site as a rare sand dune bio-geographical habitat for rare existing native plants.

2) Public investment in the surrounding area

It has long been hoped and planned that the area running along the eastern side of Visitacion Avenue from Visitacion Valley Middle School to Hahn Avenue would be improved for our community.

Existing Conditions

North of Mansell Street, McLaren Park is relatively well kept with numerous public amenities. South of Mansell Street the conditions in McLaren Park change dramatically for the worse. Much of this parkland lacks pathways and is too steep and over-grown with weeds to be accessible for the average park user. For the most part private homes, El Dorado Elementary School, Visitacion Valley Middle School and John King Senior Housing have been built adjoining the McLaren Park border forming an impenetrable wall around the park. There is an obvious lack of entryways. The most topographically level and beautiful open space in Visitacion Valley has been allocated to a single use entity – the Gleneagles Golf Course. The only other open space, that could have served the entire community, has been set aside by Rec/Park for a bike park on Sunnydale Avenue. (See photos)

Improvements Underway or Proposed

• **Future Improvements:** There will be a PUC rain garden at the Leland Avenue entry adjacent to the Community Garden, which is in the process of major renovation. This area will become a focal point and outdoor education center for McLaren Park, as well as the neighborhood. The proposed 590 Leland project will be in the middle of these public amenities.

• **Outdoor Education Canter**: This is the beginning of the eventual establishment of a park area landscaped with native plants and containing trails from Visitacion Valley Middle School, John King Senior Community and the neighborhood into McLaren Park's natural area north of the golf course. It is envisioned by many that a Native Plant Demonstration Garden be linked to the Community Garden and Rain Garden as a venue for environmental education. There have been plans for students from Visitacion Valley Middle School to help clear and landscape

portions of the space under the guidance of the environmental education program, Kids in Parks, and middle school teachers. Community members will also volunteer. This entire area offers an opportunity for the Visitacion Valley community, as well as regional park users to learn about native plants, agriculture, horticulture and water conservation.

• **Trail:** A little over a year ago, with the help of SFRPD, local volunteers, and the group, Volunteers of California (VOCAL), there was a site cleanup for a trail from the middle school to Hahn Avenue. Dead trees and weeds were removed and the first phase of a trail was built. The flow of this parkland will be forever compromised and impeded by the 590 Leland development. It will create a very narrow passage for the public trail at Raymond Avenue.

• **McLaren Park Entryway:** The McLaren Park land from the middle school to Hahn Avenue is planned to become a major entryway to McLaren Park for the existing community, as well as the expected new population at Executive Park, Schlage Lock and Sunnydale Housing and park users in general. Leland Avenue provides a direct route from Schlage Lock to McLaren Park.

• **Roadway and Public Safety:** The end of Raymond Avenue has been made into a vehicular turn-around area that is close to undercutting the Visitacion Avenue roadway above. The park space on the north and south sides of the turn-around needs to be extended across Raymond Avenue to shorten the street and shore up the Visitacion Avenue roadway. This will protect the precarious roadway and connect the park pathway for pedestrian and roadway safety, park continuity and beauty. Building 3 housing units there will impede this improvement.

• **Parking:** Raymond Avenue already has parking issues due to the need for John King Senior Community staff parking. Leland Avenue, a cul-de-sac, also poses parking issues for neighbors. Two parking spaces, each for the 5 proposed 590 Leland units will make the problem worse. Adding to the problem, the developer states that the units have 4 bedrooms, but there are other spaces in the designs that will allow for more bedrooms. More residents mean a higher demand for parking spaces.

• **McLaren Park Community Design Process:** The Recreation and Park Department and PUC are already investing several million dollars on improvements that will be negatively impacted by placing 5 large buildings in the middle of vital open space. This area will be included in the current McLaren Park public planning process for the entire park as part of the 2012 Park Bond allocation for McLaren Park, a process that will lead to trail, landscaping and recreational improvements to benefit the several nearby public schools and housing facilities as well as the community at large.

3) Impact on Community and Park Users :

Who will be Impacted

The general public and entire population of Visitacion Valley including future residents at the new developments, as well as nearby residents, seniors and students will be impacted by loss of open space and connectivity to the only vestige of McLaren Park accessible to the public in Visitacion Valley.

590 Leland Avenue Project includes 586, 596 Leland & 579, 583, 589 Raymond CASE # 2014.0936E

Reality of Open Space Conditions in Visitacion Valley

The issue of the open space contiguous to the 590 Leland development, which runs from the Visitacion Valley Middle School (VVMS) to Hahn Avenue needs to be examined in terms of the greater McLaren Park open space situation in Visitacion Valley and its community impacts. The area surrounding the site is home to Sunnydale (largest public housing project in the City), Heritage Homes and Britton Courts Housing Projects, John King Senior Community housing and the Visitacion Valley Middle School. El Dorado and Visitacion Valley Elementary Schools are nearby.

Since the Visitacion Valley neighborhood is located near McLaren Park it is not considered a "high needs" area in terms of open space. In reality, residents of Visitacion Valley do not have adequate access to McLaren Park. Given the enormous amount of high density housing soon to be built in the Valley, it is even more critical to provide as much usable open space and accessibility as possible for the neighborhood.

Seniors and Students

The area provides much needed open space for the seniors living at John King Senior Community (JKSC). Currently, they are forced into the street to exercise and walk, as it is difficult for them to enter the park. The only flat open space near JKSC is at the proposed 590 Leland project area on Raymond Avenue. Middle school students routinely use the pathway to and from home.

Neighborhood Character and Identity

Although the church building was not judged to be of historical or architectural importance to those who evaluated it for the Environmental Review, in reality it does have importance to the fabric of the Visitacion Valley neighborhood that lacks landmarks, interesting public buildings and, in general, a positive sense of identity. The church has been part of our visual landscape for over 60 years. It was home to an African American church in a City with a dwindling African American population and cultural institutions. It was for many years a space for the non-profit, ROCK afterschool program. Both have been displaced. The church is an iconic structure that gives a sense of tranquility and defines the area. It is one of only 3 church buildings remaining in the Valley and the only one with a spire. (See photo)

We are asking for a return to former use as a community resource. In this era of sky rocketing rents, non-profits have been forced to leave the City. The Church building could be a shared space for many non-profits, particularly those devoted to education and environmental issues.

Environmental Education Opportunities

This overall open space will become an outdoor destination point for environmental and agricultural education. It will be a living laboratory, if you will, for the people of San Francisco and, particularly for high-risk children and youth in a neighborhood lacking recreational and environmental educational opportunities. Plans for this project have already displaced the students from the after school program, ROCK (Real Opportunities for City Kids), from their original space, which was located in the Church. In addition, the site is part of a rare bio-geographical sand dune, which, in itself, offers an invaluable venue for outdoor education.

Community Involvement/Stewardship

Students involved in an outdoor education program at Visitacion Valley Middle School, as well as other youth, children and local residents, will volunteer to improve the area. There have been volunteer work parties at the Leland Avenue Community Garden with neighbors, SF Conservation Corps and SFRPD youth programs. Students from ROCK (Real Opportunities for City Kids) and Boys and Girls Club have participated in programming at the Community Garden. Students from Visitacion Valley Middle School taking part in a Kids in Parks environmental education program there will begin improving a site on the upper Raymond portion of the site next year. In the future, as has been ithe case of the Visitacion Valley Greenway, community volunteers will be heavily involved in park improvements.

Affordable Housing

Our historically neglected neighborhood has promoted and embraced new high density housing at Executive Park, Schlage Lock and Sunnydale Housing as well as past projects at Britton Courts and Heritage Homes, but this proposed project in such a sensitive area is asking too much of our community. We need open space to accommodate the needs and desires of an enormous influx of new residents and our already beleaguered residents. Building high cost mega-homes in a neighborhood desperately in need of affordable housing is a slap in the face of an underserved community that has long fought for more housing when other neighborhoods have rejected it. The 590 Leland project does not benefit the people of Visitaciop Valley. It adds no value to the neighborhood. Instead, much will be lost to the well-being, quality of life and health of the community.

Degradation of any open space in San Francisco is not in the best public interest. We ask that the 590 Leland Avenue site be annexed to McLaren Park and that the proposed housing development not be approved by the Planning Commission.

McLaren Park Outdoor Education Center

ADVISORY COMMITTEE

Dr. Michael Vasey, Director NERR, member of SFSU Biology Department staff **Michael Wood**, President, Wood Biological Consulting

Ana Vasadueo, Former Director Blue Greenway, Environmental and Land Use Planning Degree from Cornell

Linda Shaffer, Former PROSAC District 10 representative, CNPS Board Member, PhD Economics

Charlotte Hill, Environmental Educator, Former Director and Teacher in Kids In Parks program **Damien Raffa**, Education/Volunteer Program Manager, Presidio Trust, SF Committee for Children and Nature Network, Cities Connecting Children to Nature

Amber Hasselbring, Director, Nature in the City

Linda Davirro, Chair of Crocker Amazon Park Advisory Committee, former Chair of PROSAC Zahra Kelly, Director, Friends of Palou/Phelps Park, Director of Advocacy, Nature in the City Markos Major, Director, Climate Action Now

Fran Martin, Visitacion Valley Planning Alliance and Visitacion Valley Greenway

In addition, supporters have signed a petition, available when needed.

<u>Question #3)</u> What alternatives or changes to the proposed project, beyond the changes (if any) already made would respond to the exceptional and extraordinary circumstances and reduce the adverse effects noted in question #1?

The alternative that best serves the greater public good and surrounding neighborhood is to not permit housing at 590 Leland Avenue, particularly housing that is out of line with the predominately two story housing in the neighborhood and the open space and educational needs of the community. The community has a plan that is in keeping with the General Plan and improvement of the parkland for the adjacent long neglected Visitacion Valley community and park users from the City and Bay Area region.

COMMUNITY PROPOSAL FOR WESTERN MCLAREN PARK FROM VISITACION VALLEY MIDDLE SCHOOL TO HAHN AVENUE

The entire ribbon of McLaren Park open space from Visitacion Valley Middle School to Hahn Avenue adjacent to Visitacion Avenue is envisioned as a Native Plant Demonstration Garden and Outdoor Education Center. It would encompass:

- The soon-to-be renovated Leland Avenue Community Garden
- The soon-to-be-built PUC Rain Garden
- An Environmental Education Center located in the existing church at 590 Leland.

• Pathways through a Native Plant Demonstration Garden, which includes a rare biogeographical sand dune, linking the Middle School, Coffman Pool, Hahn Avenue and the greater McLaren Park west of Visitacion Avenue to the Visitacion Valley community and general park users.

Reasons

San Francisco's largest park, Golden Gate Park, was conceived as a destination point with infrastructure such as the Band Concourse, Botanical Garden, Windmills, Academy of Sciences, Museums, Conservatory of Flowers, etc. to attract the public. McLaren Park, our second largest park was conceived as a more natural open space for the public to experience the environment in its unstructured form.

Over the years McLaren Park has significantly shrunk in size due to loss of land to both public and private housing and public schools. Still it represents our best hope for major open space devoted to nature, which is of particular necessity in this time of loss of wildlife habitat and global warming. Generally, our cities are 10 degrees warmer than the surrounding countryside. Worldwide we are facing unprecedented loss of species and drought has made water scarce and threatens our green infrastructure. Facing this global crisis, it is important that we act locally to educate ourselves about the environment and the value of native plant species, which are drought resistant. What better place than McLaren Park?

There is no other area in the park where an outdoor education center would be viable. At 590 Leland there is already a building, i.e. the church, to accommodate community needs – no necessity to build anything on precious open space. It is a large building adjacent to the overall

590 Leland Avenue Project includes 586, 596 Leland & 579, 583, 589 Raymond CASE # 2014.0936E

site that could accommodate classes, meeting rooms, exhibits and offices for environmental groups. We are asking for a return to its former use as a community resource. The 590 Leland Project has displaced the nonprofit ROCK afterschool program and an African American church of long standing in a City with a dwindling African American population and cultural institutions. The church has had historic and visual importance to the fabric of neighborhood that has few public landmarks,

A Recreation and Park Community Planning Process to create an overall plan for McLaren Park began July 23. That process will consider incorporating the 590 Leland site in McLaren Park to create the best possible open space plan for the entire park. An outdoor education center and much needed accessibility to the park for Visitacion Valley residents and the general public are needed. The goal of good City planning is to use land for the highest, best use in the public's interest. That should take precedence over building new unaffordable housing. Given the major influx of new housing units proposed for Visitacion Valley and the enormous number of new residents coming to the area, it is vital that the needs of those people be met, as well as existing residents. Plans for McLaren Park's future need to address viewing the park in its totality as an environmental resource and a venue for outdoor education. The 590 Leland project directly threatens the viability of the planning process and the park open space.

According to several Native Plant experts, including Dr. Michael Vasey, of particular importance to McLaren Park and San Francisco, is the distinctive presence of the biogeographical remnant sand dune, the easternmost in the City, which comprises the site. There are 2 native plant species located in the sand dune, one is locally rare and the other is endangered. Both are the only ones in McLaren Park, The overall site should be protected by the Recreation and Park Department.

Educational Opportunities.

At this critical moment we have an unprecedented opportunity to create an outdoor destination point for environmental and agricultural education that will not come our way again. It will be a living laboratory, if you will, for the people of San Francisco and, particularly, for high-risk children and youth in a neighborhood lacking recreational and environmental educational opportunities.

Connecting Children to Nature Initiative

San Francisco is a core member in the national Cities Connecting Children to Nature initiative, which advocates for outdoor education and recreational opportunities for children. As one of only 7 cities chosen nationwide, there is an effort on the part of our Recreation and Park Department to focus on providing better service to our children. The McLaren Park Outdoor Education Center would be central to making San Francisco a leader in environmental education for children.

It is of vital importance that such an Outdoor Education Center be created in McLaren Park for the following reasons:

• **Empowerment:** With a population of 66% Asian, 8% African American,18% Latino and White 12%, Visitacion Valley represents the future diversity of our City and country. As population demographics change, it is critical to be more inclusive of "minorities" who have not been as active in the environmental movement due to various socio-economic barriers. Education on all fronts is necessary to empower our future environmental leaders.

590 Leland Avenue Project includes 586, 596 Leland & 579, 583, 589 Raymond CASE # 2014.0936E

• **Social Justice**: The minority population of Visitacion Valley has been over-shadowed by various interest groups who have had a larger voice in planning for McLaren Park. The City has systematically ignored the needs of the Visitacion Valley community on all levels.

• Living Lab: The Native Plant Demonstration Garden, sited in a Recreation and Park open space would teach the public about what plants they could plant in their own yards and be a model for future planting in all our City parks. Interested professionals, teachers and classes could profit from such a resource for hands-on education. The Demonstration Garden would provide a habitat refuge for wildlife. A small greenhouse could be annexed onto the back of the church building for propagating native plants.

• Unique Bio-geographical Site: The site is the only sand dune in McLaren Park and the easternmost sand dune in San Francisco. It is also home to 2 native plants of significance found nowhere else in the vicinity. This is a living lesson in biodiversity that makes the area very special to environmental science and our residents, as well.

The future McLaren Park Native Plant Demonstration Garden and the 590 Leland site are inextricably linked. It is critical to not allow housing development and protect such a site since according to the general plan:

• "...the two areas together would support a larger or more diverse natural habitat,

•"...The site is undeveloped and relatively undisturbed, ...

• We should "Preserve, protect and <u>restore local biodiversity</u>. ...Yet San Francisco continues to lose species diversity due to isolation and fragmentation of habitats and invasive species."

• Lack of Outdoor Education Facilities in City and Specifically, McLaren Park: The only environmental education center operated by the Recreation and Park Park Department is the Randall Museum, which is geographically inaccessible to those in the Southern neighborhoods. McLaren Park has no suitable place for exhibits and for people to meet in-doors. The only possibilities are the small clubhouses at McNab Lake and the Crocker Amazon Playground: neither is surrounded by open space or adequate for an Environmental Education Center.

• <u>**Repurposing:**</u> Returning the church building to its original function as a community asset and, specifically, creating an Environmental Education Center there is the smart, innovative choice. There would be no need to use precious open space for a new building and it is positioned in an education facility-rich, underserved area available to 3 high schools, a middle school and 3 elementary schools. In San Francisco there is an unprecedented loss of non-profits unable to compete for overpriced space. This crisis is well documented, and the church building would help alleviate the situation as an office and meeting space for nonprofits. Note that the Mayor has created the Nonprofit Space Investment Fund and Nonprofit Space Stabilization Program to address this very problem.

Given the extraordinary features of this site, it is necessary that it remain open space and that the church serve as a much needed community asset.



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December 28, 2016

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

Subject: Proposed development at 590 Leland Avenue, San Francisco

To Whom it may Concern:

I am writing to alert you to a recent discovery of biological significance at and near 590 Leland Avenue in Visitacion Valley near McLaren Park. The discovery pertains to at least two significant plant species that are indicators of remnant coastal dune habitat that were not reported to exist before in this area. The two species in question are *Croton californicus* (Euphorbiaceae) and *Chorizanthe cuspidata* (Polygonaceae). The existence of these two species in this habitat suggests that there may well be other plant and animal species associated with this rare habitat in the area that have not yet been observed.

My background is relevant to this discovery. I am a trained botanist and plant ecologist and have worked at San Francisco State (SFSU) since 1990. I have served as president of the California Botanical Society and on the state board of the California Native Plant Society. In the early 1990's, I coordinated a vascular plant species inventory for the Presidio prior to its transfer to the GGNRA. During that time, I became thoroughly familiar with the coastal dune flora that is still present there today. Later in the 1990's, I coordinated SFSU participation with the San Francisco Recreation and Parks Department conducting a survey of the flora of candidate natural areas that were recently formalized by the adoption of the EIR for the Significant Natural Areas Program (SNAP). I conducted ground surveys with other park botanists and graduate students on virtually all of these areas, including McLaren Park. At that time, our survey work was focused on the open grassland area between Sunnyvale, Geneva, and Brookdale. Soils of this site are from weathered upland rocks of the Franciscan Formation. There were no dune soils in this area as best I recall. I believe that this area is still the primary SNAP management focus for McLaren Park. At the time, I was unaware that coastal dune soils were present down below in Visitacion Valley or that any of this habitat remained undeveloped.

I first learned that there might be coastal dune habitat in and near McLaren Park in July 2016 and visited the site on July 22. I confirmed the dune habitat and *Croton californicus* (California croton) occurrence at the Leland Avenue property and also across Raymond Avenue on McLaren Park property. While surveying the McLaren Park property near the end of Raymond, I also discovered several individuals of a rare San Francisco endemic spineflower, *Chorizanthe*

The Celifornia State University: Bakersfield, Chennel Islands, Chico, Dominguez Hills, Fresno, Fullerton, Hayward, Humboldt, Long Beach, Los Angeles, Maritime Academy, Monteray Bay, Northridge, Pomone, Sacramento, San Bernardino, San Diego, San Francisco, San Jose, San Luis Obispo, San Marcos, Sonome, Stanislaus *cuspidata* (San Francisco spineflower). There has been uncertainty about the distinctness of the spineflower in the literature but, currently, it is considered a full species in its recent treatment in the latest California flora (Jepson Manual 2nd Edition 2012). The distribution of this species is restricted to San Francisco dune habitats and dunes in southwestern Marin. If it had been considered a species previously it might well have been listed under the federal Endangered Species Act (as another rare dune annual in San Francisco, *Lessingia germanorum*, was previously listed). It could well become a candidate for listing in the future. The California croton, on the other hand, is a more widespread species of coastal dunes and inland sandy soils in Southern California. However, the great sand dune ecosystem in San Francisco is its northernmost known locality, far removed southern populations in Monterey Bay. Consequently, it is considered a distributional disjunct and range extension which could well represent a distinct genotype that is important for the future persistence of the species under different climate change scenarios.

The extension of San Francisco's dune habitat to southeastern San Francisco in Visitacion Valley was unexpected by me. However, this sandy soil is well documented in an early geological map by Andrew C. Lawson that accompanied a Carnegie Institution publication in 1908 in conjunction with Harry O. Wood. Here is a pdf image of that map showing the dune habitat in Visitacion Valley:



The buff color represents Pleistocene dune sands that presumably blew across the peninsula to the bay and accumulated in this area.

Visit

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http://www.davidrumsey.com/luna/servlet/detail/RUMSEY~8~1~31130~1151061:Geologicalmap-San-Francisco- to see the entire map. The coastal dune plant community in San Francisco has great biogeographic significance and the fact that an undeveloped remnant of this habitat still exists in upper Visitacion Valley and (remarkably) still contains rare plant species is, in my opinion, an important find that merits further investigation before more of this habitat is lost to further development.

Accordingly, I urge the Planning Commission and other governance bodies within San Francisco to require that a full Environmental Impact Analysis be conducted at this site and to potentially restrict further development of this area if it proves to be of further biological value.

Thank you for the opportunity to comment on this matter.

Sincerely,

Michael Vasey

Michael Vasey, Ph.D. 368 San Pedro Ave. Pacifica, CA 94044 (650) 255-5763 mvasey@sfsu.edu



Croton californicus - photo taken February 18, 2018

Discretionary Review Request for 590 Leland Project

LIST OF PHOTOS

1) Overview of Visitacion Valley

2) Overview of 590 Leland and Environs

2A) Overview of proposed parkland and Outdoor Education Center, from V V Middle School to Hahn Avenue. Note disruption of open space by 590 Leland Avenue Project. Block of open space from Leland to Raymond is bisected.

2B) Closer view of various public elements and existing issues that need to be addressed. 590 Project will exacerbate these issues.

2C) Parking conditions on Raymond Avenue.

3) Impact on Views

3A) View from south towards north. Lovely landscape and trees destroyed by 590 Leland Project.

3B) Loss of views from various points.

4) Impact of Shadows

4A) Impact of shadows on open space. Now at 65' in morning, would be up to 90'-95' with 3 story buildings.

5) Importance of Church to Neighborhood Aesthetics and Character

5A) Scenic view of Bay and sun.

6) Leland Avenue Community Garden

7) PUC Rain Garden

8) Concept Plan for McLaren Park Outdoor Education Center

9) Children, youth and adults who enjoy and support open space in Visitacion Valley.
OVERVIEW McLaren Park South of Mansell Street and surrounding conditions in Visitacion Valley



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LEGEND

- Area bounded by housing and schools, inacessable to general publec
- Area bounded by golf and bike courses
- Proposed area for development at 590 Leland Avenue
- Open space from VVMS to Hahn Avenue
- Mansell Street
- 2 Herz Playground/Coffman Pool
- ③ Sunnydale Housing
- 4 Heritage Homes/Britton Courts
- 5 Visitacion Valley Middle School
- 6 John King Senior Housing
- ⑦ El Dorado Elementary School

OVERVIEW 590 Leland and Environs





Approximate dimensions of 590 Leland site:

Raymond Ave.	113.5 feet		
Leland Ave.	44.1 feet		
North to South/East side	198.7 feet		
North to South/West side	200.1 feet		

590 Leland Avenue site No Community Garden, Rain Garden, entryway to McLaren Park and trail area from VVMS to Hahn Ave.



2



Visitacion Ave. is 10' above and 10' from end of Raymond Ave. Roadway is undercut and in need of shoring up. Plan needed to coordinate V V Middle School path, parking and roadway improvements, 590 Leland project exacerbates these existing roblems.

UnsteadonAve

Path to VV Mode School

Only flat area above Leland Ave.for ADA accessibility

Leland,

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Main entry to McLaren Rain Garden

Community garden-80 plots

How do these disparate elements interface? There is no comprehensive plan.





View to South from pathway below V V Middle School



View to South of San Bruno Mountain and Valley from Raymond Avenue





3

Adjacent to site - Southwest View of Bay and San Bruno Mountain



View from Lelandf Avenue looking North - Future renovated Community Garden, PUC Rain Garden and main entry to Mclaren Park in foreground

Loss of open space, views and trees from south

3



Existing



After Development



Impact of shadows



Red indicates shadows cast by development of up to 75 feet





Existing conditions on Raymond Avenue : Shadws 50 feet long cast by 2 story building at 9 am







Importance of Church to neighborhood aesthetics and character







Leland Avenue Rain Garden (At McLaren Park Community Garden)





Existing Condition at end of Leland Ave

SEWER SYSTEM IMPROVEMENT PROGRAM | Grey. Green. Clean.

Proposed Rain Garden Perspective





Those who value the environment

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		220eal Fee Waiver		
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Fran Martin				
APPLICANT ADDRESS: 186 Anleta Ave. San Francisco, CA 94134		телерноле: (4155 216-8560 Еман: Fma 67648602 Abc.com		
Visitación Valley Planning Neighborhood organization address: 186 Arleta Avr. San Francisco, CA 94134		TELEPHONE: (4157 216-8560 EMAIL: Fma67648602AQ.com		
590 Leland Ave. PLANNING CASE NO.: 2014.0936 E	demotitio	BUILDING PERMIT APPLICATION NO.: DATE OF DECISION (IF ANY):		
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		nization and is authorized to file the appeal m of a letter signed by the President or other		
Y The appellant is appealing on beha and that appears on the Department	If of an organization that nt's current list of neighb	is registered with the Planning Department orhood organizations.		
to the submittal of the fee waiver re-	quest. Existence may be	has been in existence at least 24 months prior established by evidence including that relating ninutes, resolutions, publications and rosters.		
The appellant is appealing on beha that is the subject of the appeal.	lf of a neighborhood org	anization that is affected by the project and		