MEMO

Categorical Exemption Appeal

590 Leland Avenue

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

Reception: 415.558.6378

Fax:

415.558.6409

Planning Information: 415.558.6377

Lisa Gibson, Environmental Review Officer – (415) 575-9032

March 26, 2018

Josh Pollak - (415) 575-8766

Planning Case No. 2014.0936E

Appeal of Categorical Exemption for 590 Leland Avenue

Angela Calvillo, Clerk of the Board of Supervisors

April 3, 2018

ATTACHMENTS: A: Biological Resources Information

B: View Analysis

PROJECT SPONSOR: Victor Quan, (415) 531-8311, vquan.sf@gmail.com

APPELLANT: Fran Martin, Visitacion Valley Planning Alliance

INTRODUCTION

HEARING DATE:

DATE:

FROM:

TO:

RE:

This memorandum and the attached documents are a response to the letter of appeal to the Board of Supervisors (the "Board") regarding the Planning Department's issuance of a Categorical Exemption under the California Environmental Quality Act ("CEQA Determination") for the proposed 590 Leland Street (the "proposed project").

The Planning Department, pursuant to Title 14 of the CEQA Guidelines, issued a Categorical Exemption for the proposed project on February 12, 2015, finding that the proposed project is exempt from the California Environmental Quality Act (CEQA) as a Class 32 categorical exemption.

The decision before the Board is whether to uphold the Planning Department's decision to issue a categorical exemption and deny the appeal, or to overturn the Planning Department's decision to issue a categorical exemption and return the project to Planning Department staff for additional environmental review.

SITE DESCRIPTION & EXISTING USE

The subject property is located on Assessor's Block 6243, spanning five parcels. The project block is bounded by Raymond Avenue to the north, Leland Avenue to the south, Sawyer Street to the east, and Visitacion Avenue to the West. The proposed project is immediately adjacent to John McLaren Park and McLaren Community Garden, in the Visitacion Valley neighborhood. Currently, the five parcels contain an existing 37'-2 1/2"-tall church building. Constructed in 1954, the existing building measures approximately 8,416 square feet and is currently vacant. The subject parcels front onto both Leland Avenue and Raymond Avenue. These portions of Leland and Raymond avenues do not have direct connections to Visitacion Avenue, as the parcels directly abut John McLaren Park. All five parcels have pedestrian access via sidewalks or other street improvements.

SURROUNDING PROPERTIES AND NEIGHBORHOOD

The project site is located in an area characterized by single-family residences and a public park, as well as the nearby Coffman Pool, the John King Senior Community, and the Visitacion Valley Middle School. 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 Zoning District. The project site is adjacent to the McLaren Community Garden, which is currently under construction.

PROJECT DESCRIPTION

The proposed project includes the demolition of the existing church building and construction of five new single-family homes, addressed as: 579, 583 and 589 Raymond Avenue and 586 and 596 Leland Avenue, across five individual lots. 586 Leland was formally referred to as 590 Leland Avenue; however, prior to conducting the 311 Neighborhood Notification, the address was revised to 586 Leland Avenue. 590 Leland Avenue is the name of the proposed project in its entirety and the address of the existing church. Three of the five residences would front Raymond Avenue, while two of the residences would front Leland Avenue.

At 579, 583 and 589 Raymond Avenue, the project would construct three, three-story, single-family residences—each with two off-street parking spaces. The Project would incorporate roof decks at their respective third stories, which would be setback from the front façade. These three residences would be 3,456, 3,706 and 3,706 gross square feet in size, respectively, and would each have a height of 29′-10 1/4″.

At 586 and 596 Leland Avenue, the project would construct two, three-story, single-family residences—each with two off-street parking spaces. The project would incorporate roof decks at their respective third stories, which would be setback from the front façade. These two residences would be 3,506 and 4,372 gross square feet in size, and would have heights of 32′-3″ and 31′-11″, respectively.

The project sponsor updated the design of the proposed project after publication of the 311 notice at 579, 583, 589 Raymond Avenue and 586 Leland Avenue with revised garage floor plans to reduce the garage door widths to 10 feet, per direction from the Residential Design Advisory Team (RDAT) as part of the current plan set. These revisions reduced the habitable square feet for 579, 583 and 589 Raymond Avenue by 159.5 square feet for each house.

BACKGROUND

April 25, 2014-Environmental Evaluation Application

¹ On July 14, 2014, Lot 19 was subdivided into Lots 061, 062, 063, 064 and 065.

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On April 25, 2014, Victor Quan, on behalf of the project sponsor, Rioja Red Ventures LLC/Antrea Investments and Trading LLC (hereinafter "project sponsor"), filed an application with the Planning Department for CEQA Determination to demolish the existing church at 590 Leland Street, subdivide the existing lot into five lots, and construct five single family homes.

February 12, 2015-CEQA Determination Issued

The Planning Department determined that the project was categorically exempt under CEQA Class 32—In-fill Development Projects (CEQA Guidelines Section 15332), and that no further environmental review was required on February 12, 2015.

July 29, 2016-Request for Discretionary Review

On July 29, 2016, Fran Martin, on behalf of the Visitacion Valley Planning Alliance, submitted an application for Discretionary Review.

January 5, 2017 to November 2, 2017-Continuance of Planning Commission Hearings

The Discretionary Review hearing originally scheduled for January 5, 2017 was continued to the January 12, 2017 Planning Commission hearing. At the public hearing on January 12, 2017, the Commission heard and continued the Request for Discretionary Review to the March 2, 2017 Planning Commission hearing and requested that the Environmental Planning Division provide a response to the letter prepared by Dr. Michael Vasey, Ph.D. of the San Francisco State University Department of Biology, dated December 28, 2016. The letter indicated the potential presence of two sensitive plant species: the San Francisco spineflower (*Chorizanthe cuspidate var. cuspidate*; California Rare Plant Rank 1B.2) and the California croton (*Croton californicus*; a locally significant species) at and near the project site. The Request for Discretionary Review was subsequently continued indefinitely pending the aforementioned environmental memorandum, and noticed the Request for Discretionary Review for a Planning Commission hearing on November 2, 2017. Planning Department staff prepared a full Discretionary Review analysis²; however, the item was not heard and was subsequently continued to public hearing on January 18, 2018.

January 18, 2018-Approval by the Planning Commission

The Planning Commission approved the proposed project³ in accordance with Chapter 31 of the San Francisco Administrative Code at its January 18, 2018 meeting.

February 20, 2018-CEQA Appeal Filed

An appeal of the Categorical Exemption Determination was filed by Fran Martin, on behalf of the Visitacion Valley Planning Alliance, (the "appellant") on February 20, 2018.

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² Link to Discretionary Review packet: http://commissions.sfplanning.org/cpcpackets/2014.0936DRPc4.pdf. The Discretionary Review addressed neighborhood compatibility, McLaren Park improvements, consideration of the existing church as a historic resource, natural habitats, views, shadow, accessibility, community planning, site acquisition by Recreation and Parks, consistency with zoning, and an alternative proposal for the site. The Planning Department staff recommendation was to not take DR and approve the project as proposed.

³ The proposed project was approved by a 5-0 vote (with 2 absent), which took Discretionary Review with the condition that the 598 Leland Avenue site maintain the 25' module for consistency.

February 26, 2018-CEQA Appeal Timely Filed

On February 26, 2018, the Planning Department determined that the appeal of the CEQA Determination was timely filed.

CEQA GUIDELINES

Categorical Exemptions

Section 21084 of the California Public Resources Code requires that the CEQA Guidelines identify a list of classes of projects that have been determined not to have a significant effect on the environment and are exempt from further environmental review.

In response to that mandate, the State Secretary of Resources found that certain classes of projects, which are listed in CEQA Guidelines Sections 15301 through 15333, do not have a significant impact on the environment, and therefore are categorically exempt from the requirement for the preparation of further environmental review.

CEQA State Guidelines Section 15332, or Class 32, consists of projects characterized as in-fill development meeting the following conditions: the project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations; the proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses; the project site has no value as habitat for endangered, rare or threatened species; approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality; and the site can be adequately served by all required utilities and public services.

In determining the significance of environmental effects caused by a project, CEQA State Guidelines Section 15064(f) states that the decision as to whether a project may have one or more significant effects shall be based on substantial evidence in the record of the lead agency. CEQA State Guidelines 15064(f)(5) offers the following guidance: "Argument, speculation, unsubstantiated opinion or narrative, or evidence that is clearly inaccurate or erroneous, or evidence that is not credible, shall not constitute substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts."

APPELLANT ISSUES AND PLANNING DEPARTMENT RESPONSES

The concerns raised in the February 20, 2018 Appeal Letter are cited below and are followed by the Planning Department's responses.

Issue 1: Biological Resources: The appellant asserts that the biological resources assessment is inaccurate and incomplete, since it did not identify the existence of sensitive species very near the site and due to its failure to acknowledge the existence of rare habitat across the street on Recreation and Park Department property. The appellant included a December 28, 2016 letter from Dr. Michael Vasey, which documents the presence of two plants of biological significance identified at and near 590

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Leland Avenue, namely the California croton (*Croton californicus*) and the San Francisco spineflower (*Chorizanthe cuspidate*). Further, the appellant's volunteer consultant found evidence of a locally rare plant, the California croton at and near the site on February 10, 2018.

Response 1: The CEQA Determination for the proposed project found that the project site does not contain contiguous and substantial habitat for any rare or endangered plant species. The San Francisco spineflower is considered a federal Species of Concern, and is given a "1B" status by the California Native Plant Society, indicating that it is a plant that is rare or endangered in California and elsewhere. The California croton is designated as "locally significant" according to the Yerba Buena Chapter of the California Native Plant Society (San Francisco and San Mateo counties), primarily because it is considered at high threat of extirpation in San Francisco and because its San Francisco population is discontinuous from populations elsewhere in California. The California croton is not listed on federal or State threatened or endangered species lists. However, both the San Francisco spineflower and the California croton are considered biological resources for the purposes of CEQA.

The project site was surveyed by consultant biologists⁴ for the California croton and the San Francisco spineflower on January 9, 2017; May 2, 2017; May 18, 2017; and July 7, 2017 (see Attachment A). The biological resources surveys included a detailed inventory of 34 plant species observed on the project site, and these characterized the vegetation as primarily ornamental around the existing church building, and as non-native and invasive plant species in the undeveloped, northeastern portion of the site. The northeastern portion of the site was found to contain predominantly non-native annual grasses (rattlesnake grass and slender oat). The surveys did not identify California croton or the San Francisco spineflower within the survey area and did not find suitable habitat for these sensitive species on the project site.

On March 9th 2018, Planning Department staff and consultant biologists met the appellant at the project site. The appellant showed staff and the consultants the location of two California croton plants, located outside of the project site, approximately 7 feet west of the property line, adjacent to a heavily trafficked footpath. This area is owned and managed by the San Francisco Recreation and Park Department (RPD). As the individual plants were located outside the project site (beyond the area surveyed by consultant biologists), observed to be approximately six-inches tall, growing among non-native grasses, they may have not been detectable or present during prior site surveys. No California croton plants were identified within the project site and no San Francisco spineflower plants were found within, adjacent to, or nearby the project site.

The location of the California croton plants within RPD managed lands was conveyed by Planning Department staff to RPD staff, and to California Native Plant Society members. Construction of the proposed project would occur within the property line of the project site. The project sponsor has stated that any staging areas for construction would occur along the Raymond Avenue and Leland Avenue frontages, and would not occur north of the property line on RPD-owned land. No easements have been sought or granted to stage project construction on RPD property. In addition, the project site would be

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⁴ Rachel Danielson and David Rodriguez, Environmental Science Associates, Rare Plant Survey Results for 590 Leland Avenue, San Francisco, California, July 17, 2017.

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fenced off during construction, which would prevent disturbance to the existing California croton plants on RPD-managed land. The proposed willow fence that would be constructed by the project sponsor along the western edge of the parcel at 589 Leland would be lower in height than the existing trees along the property line, and the proposed residential development would be set back about 30 feet from the property line at that location. Therefore, the proposed project would not have a significant impact on the two California croton plants on the adjacent parcel due to direct disturbance during construction.

The appellant suggests that the proposed project could have an effect on the plants once the proposed residences are constructed by casting shadow on the plants. A preliminary shadow fan analysis for the project was prepared by Planning Department staff for informational purposes as part of the CEQA Determination, which included RPD land north of the project site and the community garden. The shadow fan indicated that the proposed project would have the potential to cast shadows north and west of the project site, and on the northern portion of the community garden. The proposed project's net new shadow would be limited to the morning in fall and winter and the early morning (before about 10:00 am) in spring and summer. Full sun would be maintained in the afternoon year-round. The net new shadow would not have a substantial effect on the total amount of sunlight the plants receive throughout the day and year-round, and would therefore not affect their survival.⁵ The appellant has not provided any substantial evidence that the construction of new single family homes on the parcels would substantially affect the viability of the two California croton plants found on the adjacent RPD-owned parcel. In light of this information, the proposed project would not affect the two California croton plants on the adjacent parcel due to shadow effects.

In conclusion, as no San Francisco spineflower plants were found within or adjacent to the project site, no California croton plants were found within the project site, and the existing California croton plants on the adjacent parcel would not be substantially affected by the project, the proposed project would not have a significant impact on biological resources. The appellant has not provided substantial evidence that there would be a significant impact on biological resources as a result of the project.

Issue 2: Loss of Views: The appellant asserts that there was an inaccurate and incomplete analysis of the loss of views from public open space.

Response 2: With respect to any potentially significant effects on views or visual resources under CEQA, the proposed project was determined to be consistent with Section 21099(d) of the Public Resources Code (PRC). Section 21099(d)(1) of the PRC provides that, "aesthetics and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." This means that, effective January 1, 2014, for qualified projects, aesthetic impacts, including effects on views and scenic resources, are not considered to be impacts under CEQA. The project meets the definition in PRC Section 21099(d)(1) of a residential project located on an infill site and within a transit priority area. Therefore, the effect on visual resources

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⁵ Email from Rachel Danielson, Environmental Science Associates, March 23, 2018.

⁶ 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.

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shall not be considered an environmental effect of the proposed project pursuant to CEQA, and was appropriately not analyzed in the CEQA Determination.

For informational purposes, this appeal response notes that, as part of the Discretionary Review considered by the Planning Commission on January 18, 2018, the Planning Department found that the proposed project is not located in a view corridor protected by the General Plan. The Discretionary Review analysis states the following:

As provided in the Residential Design Guidelines, "The Urban Design Element of the General Plan calls for the protection of major public views in the City, with particular attention to those of open space and water. Protect major views of the City as seen from public spaces such as street and parks by adjusting the massing of proposed development projects to reduce or eliminate adverse impacts on public view sheds. The Urban Design Element identifies streets that are important for their quality of views."⁷

Page I.5.16 of the Urban Design Guidelines provides two maps, "Street Areas Important to Urban Design Views" and "Quality of Street Views."

On the "Street Areas Important to Urban Design Views" map, Leland and Raymond Avenues at the 6243 block are both considered "Streets that extend the effect of Public Open Space"; however, the aforementioned streets are not on the Route of Forty-Nine Mile Scenic Drive, Street View of Important Building, Streets that Define City Form nor are they Important Street Views for Orientation. Further, the proposed projects' single-family homes respect the front setback as required, and are setback at the third story from their respective street frontages.

On the "Quality of Views" map, both Leland and Raymond Avenues at the 6243 block are considered "Average Quality of Street Views". There are neither "Good Quality" nor "Excellent Quality of Street Views" in the immediate vicinity of the 590 Leland Avenue project.

Furthermore, per the Planning Department's Geographic Information System's database, the 590 Leland Avenue project site is not in the immediate vicinity of areas identified with "Important Views". The nearest "Important View" is more than 5,000 feet away, as shown in the map titled "General Plan Urban Design Element-Important Views."

The aforementioned maps do not demonstrate a loss of view corridors from all angles nor is 590 Leland Avenue identified as an area of importance per the General Plan.

In response to the concern raised in the Discretionary Review regarding view corridors, the project sponsor prepared view analyses using General Plan and staff-recommended criteria for view corridors as part of the Discretionary Review.⁸ The project sponsor generated views of the proposed project's massing from three view locations, which show a minimal loss of the extent and quality of views from the selected

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⁷ San Francisco Planning Department. *Residential Design Guidelines: Views*, page 18, December 2003.

⁸ See Attachment B, View Analysis, which includes photo simulations of proposed project.

locations. The Planning Commission approved the proposed project and noted no concerns over the loss of views from the selected location.

In conclusion, the CEQA Determination appropriately did not consider the project's impacts on views. At the project's Discretionary Review hearing, the Planning Commission also did not consider effects on views to be substantial such that the proposed project should not be approved.

Issue 3: Safety Issues due to Interference with Sightlines: The appellant asserts that there was an inaccurate and incomplete analysis of interference with sightlines within portions of nearby parts of McLaren Park, which may present a safety issue for local schoolchildren and seniors.

Response 3: Please see Response 2, above, which addresses the analysis of the loss of views completed as part of Discretionary Review, and which notes that the effect on visual resources would not be an environmental effect of the proposed project to be considered under CEQA.

It is assumed that the appellant is referring to sightlines as stated in Recreation and Open Space Element Policy 1.10, so as to ensure that open space is safe and secure, and lists a design treatment of providing clear sightlines, where appropriate. The analysis in the Discretionary Review addressed the potential for the proposed project to conflict with Recreation and Open Space Element Policy 1.10 and found that the proposed project is not located in a view corridor protected by the General Plan.

Additionally, as discussed on page 6 of the CEQA Determination, the Planning Department determined that the project site can be adequately served by all required public services, which includes police protection and emergency responses. The proposed project would be located outside the public right of way and therefore would not affect the safety of those in the neighborhood. The appellant has not provided any additional information to demonstrate that the proposed project would affect the safety of those that would use McLaren Park or those in the surrounding neighborhood, that there would be any safety concerns from constructing 5 single-family homes, or that the proposed project would result in a significant environmental effect related to safety. Therefore, there is no evidence that the proposed project would result in a significant effect related to public safety.

Issue 4: Loss of ADA Accessible Open Space: The appellant asserts that there was an inaccurate and incomplete analysis of the loss of Americans with Disabilities Act (ADA) accessible open space.

Response 4: The proposed project would be located on a private parcel, thus it would not affect public open space or ADA-accessible public open space.

The existing unimproved pathway connecting Leland and Raymond Avenue on the project site is not an ADA accessible path of travel. Due to the difference in elevation between Raymond Avenue and Leland Avenue, the topographical change requires the use of stairs or ramps. Further, the most level portion of the subject parcel along Raymond Avenue is uneven, and is not ADA accessible. These are existing conditions that would not change with the proposed project. The appellant has not provided any

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evidence that ADA accessible open space currently exists at the project site or otherwise be affected by the proposed project.

RPD staff ⁹ has stated that the proposed project would not affect access to, use of, nor the integrity of John McLaren Park or the McLaren Park Community Garden improvements currently under construction.

Further, RPD staff has stated that it intends to improve access to John McLaren Park in general, as it is aware that people regularly use the stairs adjacent to the existing church building on the site to walk between Leland and Raymond avenues on their way to and from McLaren Park from nearby Visitacion Valley Middle School. As part of the McLaren Park Project, RPD expects to improve access to the park in that area by adding a sidewalk or paved path along Visitacion Avenue adjacent to McLaren Park from Hahn Street to the middle school. Further, RPD has stated that it does not have concerns with the proposed project. The appellant has not provided evidence that the proposed project would affect any existing ADA accessible public open space, or that the proposed project would substantially affect overall access to or use of McLaren Park or McLaren Community Garden. In conclusion, there would be no significant impact to recreation and open space.

Issue 5: Effect of Shadows on Public Open Space (RPD Property): The appellant asserts there was an inaccurate and incomplete analysis of the effect of shadows on the planned pathway and native plant landscaping to be constructed by the RPD along the north and west boundaries of the site. The appellant states the shadow analysis in general was incomplete because it did not consider the effect of project shadows on planned and under construction public improvement projects on the adjoining Recreation and Park Department property.

Response 5: Planning Code Section 295 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. Planning Code 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 range in height from 24'-9 5.8" to 32' 3" tall and would therefore not be subject to Planning Code Section 295.

As discussed in Response 1 above, the proposed project would have the potential to cast shadows north and west of the project site, and on the northern portion of the community garden.

In addition, as stated above in Response 4, RPD staff does not have any concerns with the proposed project, and the proposed project would not substantially affect access to McLaren Park or the McLaren

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⁹ Email from Jordan Harrison, Planner, Capital and Planning Division, San Francisco Recreation and Park Department, February 7, 2018 and phone conversation with Stacy Bradley, Deputy Director of Planning, San Francisco Recreation and Park Department, March 15, 2018.

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Community Garden. The appellant has not provided any evidence that shadows generated by the proposed project would result in a significant environmental effect on the adjacent RPD property.

Issue 6: Incomplete Analysis of Best Use of Site: The appellant asserts that there was an incomplete analysis of the possibility that the project site, which is on RPD's acquisition list, might have higher value as open space in a high needs neighborhood.

Response 6: The consideration of the value of the site for potential uses other than the residential uses of the project is not required under CEQA.

For informational purposes, on July 15, 2015, the Park, Recreation and Open Space Advisory Committee (PROSAC), an advisory board for RPD, voted to place 590 Leland Avenue on the RPD's Acquisition Roster¹⁰ and recommended that the Recreation and Park Commission acquire the site. The RPD staff evaluation of the 590 Leland Avenue project site noted that the site is not located within an Open Space Deficient area, and that the site is within an area of Low Need, although it is abuts an area identified as Moderate Need, and is located within a short distance of an area identified as High Need. Its staff evaluation found that no funding sources for the acquisition of the property, capital improvements to the property, or maintenance of the property have been identified. The staff evaluation also notes that the site would likely be costly to acquire, and that the existing church building would require either demolition or renovation for a park use, which would incur significant site preparation costs.

As such, RPD is not actively pursuing acquisition of the project site, and has other acquisition priorities and financial obligations that take precedence over the project site.¹¹ Acquisition funds cannot pay for capital improvements, such as the demolition of the existing church and the construction of park improvements. Therefore, even if the project site were acquired by RPD, additional funding would be necessary to construct a park. RPD staff have also confirmed that they have no concerns regarding the proposed project, as stated above in Response 4. As described above, however, the consideration of whether the project site should be acquired by RPD is unrelated to adequacy of the CEQA Determination for the proposed project.

CONCLUSION

No substantial evidence supporting a fair argument that a significant environmental effect may occur as a result of the project has been presented that would warrant preparation of further environmental review. The Department has found that the proposed project qualifies for a Class 32 Categorical Exemption. The appellant has not provided any substantial evidence to refute the conclusions of the Department.

For the reasons stated above and in the February 12, 2015 Categorical Exemption Determination, the CEQA Determination complies with the requirements of CEQA and the project is appropriately exempt

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¹⁰ Park, Recreation and Open Space Advisory Committee. January 11, 2018. *Properties Endorsed for Acquisition by PROSAC*.

¹¹ Email from Jordan Harrison, Planner, Capital and Planning Division, San Francisco Recreation and Park Department, February 7, 2018 and phone conversation with Stacy Bradley, Deputy Director of Planning, San Francisco Recreation and Park Department, March 15, 2018.

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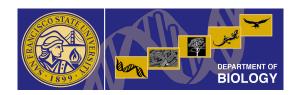
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from environmental review pursuant to the cited exemption. The Department therefore recommends that the Board uphold the Categorical Exemption Determination and deny the appeal of the CEQA Determination.

Attachment A

Biological Resources Information

- December 28, 2016 letter from Dr. Michael Vasey, Proposed development at 590 Leland Avenue, San Francisco
- January 19, 2017 Memorandum, ESA, 590 Leland Avenue, San Francisco, CA, Biological Resources Reconnaissance Survey Results
- July 17, 2017 Memorandum, ESA, Rare Plant Survey Results for 590 Leland Avenue, San Francisco, CA
- Calflora Database, March 8, 2018: California croton Observations Documented in San Francisco, CA
- Excerpt "Table 3-5. Sensitive species presently and historically know to occur at Significant Natural Areas," from: San Francisco Recreation and Park Department. 2006. Significant Natural Resource Areas Management Plan. (California croton information highlighted)
- California croton plant information from California Native Plant Society, S&S Seeds, and Moosa Creek Nursery



Department of Biology 1600 Holloway Avenue San Francisco State University San Francisco, CA 94132-1722

Tel: 415/338-1549 Fax: 415/338-2295 http://www.sfsu.edu/~biology

December 28, 2016

San Francisco 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 (NAP). 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 NAP 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*

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

http://www.davidrumsey.com/luna/servlet/detail/RUMSEY~8~1~31130~1151061:Geological-map-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.

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



550 Kearny Street Suite 800 San Francisco, CA 94108 415.896-5900phone 415.896.0332fax

memorandum

date January 19, 2017

to Ilene Dick, Farella, Braun and Martel

from Rachel Danielson, Environmental Science Associates

subject 590 Leland Avenue, San Francisco, CA, Biological Resources Reconnaissance Survey Results

Summary

The proposed project at 590 Leland Avenue would five develop single-family homes on the last parcel located on the north side of Leland Avenue (where two of the five homes are proposed) and extending to the south side of Raymond Avenue (where three of the five homes are proposed). The parcel is partially developed on the Leland Avenue portion of the property with a church. The Raymond Avenue portion of the parcel is currently undeveloped. The parcel is located adjacent to Visitacion Avenue, and McLaren Park (**Figure 1**).

Background

A Categorical Exemption of environmental review was prepared for the proposed project and a Certificate of Determination Exemption from Environmental Review was filed, both in 2015. A Discretionary Review (DR) challenge was filed for the project in 2016 following the project sponsor's application for building permits. The DR challenge included a letter from Dr. Michael Vasey, Ph.D. of San Francisco State University Department of Biology, citing the presence of remnant coastal dune habitat within the proposed project parcel. Additionally, he identified the special-status plant San Francisco spineflower (*Chorizanthe cuspidata* var. *cuspidata*; California Rare Plant Rank 1B.2) in McLaren Park adjacent to the parcel that would be developed and the plant California croton (*Croton californicus*), identified as locally significant by the Yerba Buena Chapter of the California Native Plant Society (CNPS) and an associate species in the central dune scrub vegetation community, at the same location in McLaren Park lands and within the proposed project parcel. Dr. Vasey requested further study of these resources and their importance at this location before the project is allowed to proceed.

Reconnaissance Survey

On January 9, 2017, Environmental Science Associates (ESA) biologist, Rachel Danielson, visited the proposed project parcel to conduct a reconnaissance survey of biological resources on-site and specifically identify areas of coastal dune scrub habitat which might host special-status plant species. Unfortunately, the survey was not conducted during the blooming period for San Francisco spineflower and California croton (April - July) and ESA could not confirm the presence of either species within or adjacent to the proposed project parcel; however, observations of vegetation communities within the parcel were noted.

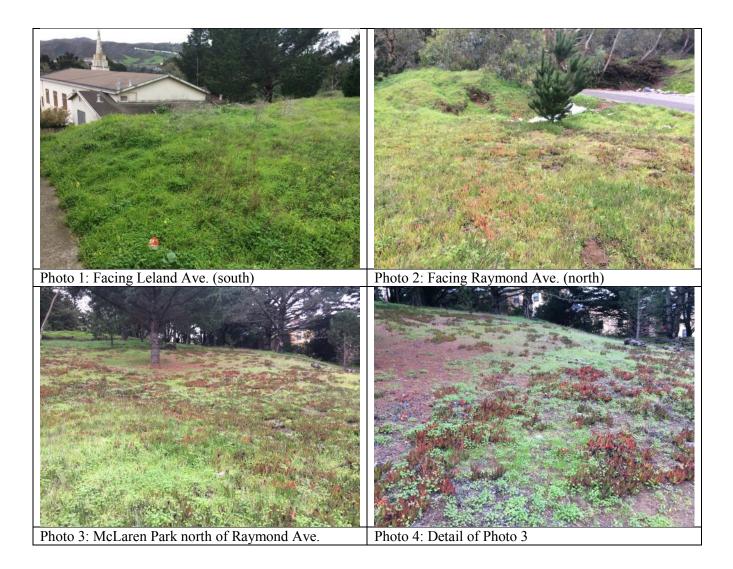
¹ Dr. Vasey observed these plants on July 22, 2016, while both species were in bloom and identifiable.



Figure 1: Project location in relation to McLaren Park (as shown within the San Francisco Significant Natural Areas Management Plan [SFRPD, 2006])

Vegetation within the proposed project is characterized as ruderal in the Categorical Exemption. This classification is often used to describe vegetation of primarily non-native, invasive, or weedy species which provide low-quality habitat value. Following the reconnaissance survey, ESA agrees with this characterization of the parcel. The undeveloped portion of the parcel facing Raymond Avenue is dominated by non-native, invasive slender oat (*Avena barbata*) and Bermuda buttercup (*Oxalis pes-caprae*) with non-native, invasive iceplant (*Carpobrotus chilensis* or *Carpobrotus edulis*) and non-native cheeseweed mallow (*Malva parviflora*) among patches of bare, sandy soil (Photo 1, below). Vegetation within the south portion of the parcel where the church is located is developed with landscaped shrubs (cotoneaster [*Cotoneaster franchetii*] among others) and trees (Monterey pine [*Pinus radiata*] and Pittosporum [*Pittosporum* sp.]) with herbaceous groundcover primarily consisting of maintained slender oat or Bermuda buttercup. Such developed, non-native landscaping which occurs on the parcel provides similar low-quality habitat value as ruderal vegetation.

Dr. Vasey identified remnant coastal dune scrub in the northern portion of the project parcel near Raymond Avenue (likely near Photo 2, below). Exposed, sandy soils nearly anywhere within the San Francisco peninsula could potentially host common plant species of dune communities (e.g. iceplant). North of the proposed project parcel, across Raymond Avenue, similar areas of sparse vegetation, with bare sandy soils and iceplant occur, and likely the location where San Francisco spineflower plants were identified by Dr. Vasey in July 2016 (Photos 3 and 4, below).



California Croton Distribution and Habitat

California croton is a perennial herb endemic to California and designated as locally rare by the Yerba Buena Chapter of the California Native Plant Society (CNPS). This species occupies coastal sage scrub, coastal strand, chaparral, and creosote bush scrub vegetation communities and considered highly threatened within the City due to development, invasive species, or off-trail travel. With a rank of A2 from the local CNPS Yerba Buena Chapter, it is known to occur in only a few places in San Francisco (Wood Biological Consulting, 2015), but is more widely distributed throughout the southern half of the state (Calflora, 2017). California croton does not have a federal or state listing under respective Endangered Species Acts or a ranking under the state-wide California Rare Plant Ranking (CRPR) system maintained by CNPS. Nevertheless, because of its local rarity and, therefore, significance within San Francisco, California croton is considered to be a special-status species.

San Francisco Spineflower Distribution and Habitat

San Francisco spineflower is a rare plant taxon that occupies sandy soils in coastal dunes, coastal dune scrub, coastal bluff scrub coastal scrub, and coastal prairie (CNPS, 2017). San Francisco spineflower has a California Rare Plant Ranking of 1B.2 by CNPS, which indicates this species is rare, threatened or endangered in California and elsewhere. This species is also designated with CNPS State Rank of S1 (critically imperiled), and Global Rank of G2T1 (Critically imperiled) but does not have a Federal or State agency listing (CNPS, 2017). Because of

its CNPS ranking, San Francisco spineflower is considered to be a special-status species. Its range includes Marin, San Francisco, San Mateo, and Sonoma counties; it is presumed extirpated in Alameda County.

Within the City of San Francisco, San Francisco spineflower plant and other sensitive dune species have been documented closer to the coast where remnant or restored dune scrub communities occur (**Figure 2**; CDFW, 2017). ESA has observed San Francisco spineflower in the vicinity of Fort Funston in a microhabitat that consists of gaps in vegetation with loose sandy soil and few other plant associates. However, it is conspicuously absent from blowouts, where wind erosion, sometimes couple with foot traffic, combine to create conditions apparently not conducive to spineflower establishment. Within otherwise densely vegetated communities, such as dune scrub, spineflower is usually found only occasionally among larger, taller vegetation with relatively dense canopies.



Figure 2: San Francisco spineflower occurrences documented in the California Natural Diversity Database (CNDDB) within five miles of the project parcel. (CDFW, 2017)

Conclusion

High quality dune habitat does not occur within the proposed project parcel. While undeveloped, the north portion of the parcel is dominated by non-native, invasive species, more common of annual grassland than coastal dune vegetation communities and isolated areas of exposed, sandy soil, with potential to host dune-associated plants (like California croton as observed by Dr., Vasey). The proposed project would develop the last parcel on the Leland and Raymond avenues east of Visitacion Avenue before McLaren Park, otherwise an area of San Francisco extensively developed or paved. The area reported by Dr. Vasey to support San Francisco spineflower is within the McLaren Park boundary and would not be disturbed under the project. Should the project proceed with development of the parcel at 590 Leland Avenue, no significant loss of high quality dune scrub habitat would occur though the development could potentially impact California croton, a plant considered to be locally significant by the Yerba Buena Chapter of CNPS.

Recommendations

ESA's reconnaissance survey could not identify the presence of special-status plants within or nearby the proposed parcel due to the timing of the reconnaissance site visit; however, a survey for San Francisco spineflower and California croton could be performed during their blooming season (April – July) within the parcel to ensure identification of rare or locally significant plants before development of the project commences. ESA recommends the following measures be implemented by the project sponsor prior to initiation of ground disturbance within the parcel to avoid any potential impacts to special-status plants:

- 1. A qualified botanist shall conduct an appropriately timed floristic survey the proposed project parcel and associated staging areas and access roads for San Francisco spineflower and California croton (blooming period for both species is April-July) to determine presence or absence of these special-status plants. The survey shall be conducted according to California Department of Fish and Wildlife (CDFW) protocol² and within one year prior to the initiation of ground disturbance.
- 2. If special-status plants area not identified during the pre-construction survey, no further action is required. If California croton or San Francisco spineflower is found within areas to be disturbed under the project, additional avoidance and protection measures would be necessary. These may include installing a temporary fence around the groups of individual plants or at the border of the population to avoid disturbance during construction.
- 3. If California croton or San Francisco spineflower plant(s) cannot be avoided, the project sponsor or their consultant shall coordinate with CDFW on the possibility of plant relocation (California croton) or seed collection and reintroduction (San Francisco spineflower) into local suitable habitat (e.g. McLaren Park). Any plant relocation, propagation, or seed collection and reintroduction shall be done under the supervision of a qualified botanist. Reintroduction sites shall be monitored annually for at least two years to assess relocated plants, seed germination, plant establishment, and to inventory individual plants within the reintroduction site boundaries unless otherwise specified by CDFW. A monitoring report summarizing results shall be submitted to CDFW on an annual basis.

References

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Wood Biological Consulting, 2015. *Locally Significant Plants of San Francisco*. Available at: http://www.wood-biological.com/san-francisco-plant-checklist/locally-significant-plants-of-sf/ Version 7/4/2015

² CDFG, 2009. Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Natural Communities. California Natural Resources Agency. November 24.



550 Kearny Street Suite 800 San Francisco, CA 94108 415.896.5900 phone 415.896.0332 fax

memorandum

date July 17, 2017

to Victor Quan

from Rachel Danielson and David Rodriguez, ESA

subject Rare Plant Survey Results for 590 Leland Avenue, San Francisco, CA

Introduction and Summary of Findings

The proposed project at 590 Leland Avenue would five develop single-family homes on the five parcels located on the north side of Leland Avenue (where two of the five homes are proposed) and extending to the south side of Raymond Avenue (where three of the five homes are proposed). The project site comprises five Assessor's Parcels on Block 6243: Lots 61, 62, 63, 64, and 65, and extends from Leland Avenue north to Raymond Avenue. The site is partially developed on the Leland Avenue portion of the property with a church. The Raymond Avenue portion of the site is currently undeveloped. The site is located adjacent to McLaren Park, with Visitacion Avenue, which runs through the park, as close as 50 feet west of the site.

In accordance with the California Department of Fish and Wildlife (CDFW) guidelines, Environmental Science Associates (ESA) biologist Rachel Danielson and botanist David Rodriguez conducted protocol-level¹ rare plant surveys of suitable habitat within the 590 Leland Avenue project site on May 2, May 18, and July 7, 2017, for special-status plant species determined to have potential to occur on the project site. The objective of these surveys was to accurately describe the presence or absence of special-status plants on the project site and identify potential impacts to such plants that could result from project implementation.

Rare plant surveys of the project site were recommended by ESA in a January 19, 2017, technical memorandum² following a reconnaissance visit of the project site to determine the presence or absence of San Francisco spineflower (*Chorizanthe cuspidata* var. *cuspidata*; California Rare Plant Rank 1B.2) and California croton (*Croton californicus*; locally significant species) during their blooming period (April-July for both species).³ Both

¹ CDFW, 2009. Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Natural Communities. California Natural Resources Agency. November 24.

² ESA memorandum documenting a reconnaissance survey of biological resources at the 590 Leland Avenue project site, January 19, 2017.

³ The California Rare Plant Ranking system was developed by the California Native Plant Society (CNPS), a non-governmental organization. The CNPS Inventory of Rare and Endangered Plants of California is maintained in cooperation with CDFW. Plants with a Rare Plant Rank of 1A, 1B, 2A, and 2B are typically considered special-status species for purposes of CEQA review. (Rank 1A plants, however, are presumed extinct in California.) The rank of 1B.2 indicates that the San Francisco spineflower is Rare, Threatened, or Endangered in California and Elsewhere, and that the plant is moderately threatened in California, with 20 to 80 percent of statewide occurrences threatened. The California croton is considered locally significant by the Yerba Buena (San Francisco county and northern San Mateo county) Chapter of CNPS, primarily because it is considered at high threat of extirpation in San Francisco and because its San Francisco population is discontinuous from populations elsewhere in California. A plant designated locally significant may warrant consideration as a special-status species under CEQA.

species were previously observed by Dr. Michael Vasey, Ph.D. of San Francisco State University Department of Biology in July 2017⁴, who identified California croton on the project site and both the croton and San Francisco spineflower nearby, in McLaren Park.

No rare plants, including San Francisco spineflower and California croton, were observed by ESA biologists during the rare plant surveys of the 590 Leland Avenue project site in 2017.

Survey Results

- On May 2, 2017, Rachel Danielson visited a reference site for San Francisco spineflower (in the vicinity of Fort Funston) to confirm the species was in bloom prior to surveying the 590 Leland Avenue site. Following the reference site visit where flowering San Francisco spineflower was observed, Rachel surveyed the entire 590 Leland Avenue site, particularly focusing on the northern portion of the site with sandy soils occur which could potentially host dune community vegetation. Rachel also surveyed the adjacent parcels north and west of Raymond Avenue where areas of sparse vegetation and sandy soils were also suspected to host San Francisco spineflower and California croton. No San Francisco spineflower plants were observed on the 590 Leland Avenue property or on the adjacent parcel to the north and west of Raymond Avenue. A reference site for California croton was not identified prior to the May 2 survey as this species is a perennial herb with a unique branch and leaf structure that would be identifiable during surveys conducted at any time throughout the year. No California croton plants were observed on the 590 Leland Avenue site or the adjacent parcel to the north and west.
- On May 18, 2017, Rachel Danielson and David Rodriguez re-surveyed the 590 Leland Avenue site for San Francisco spineflower and California croton. Neither plant was observed during this survey.
- On July 7, Rachel Danielson and David Rodriguez performed a final survey of the 590 Leland Avenue site
 for San Francisco spineflower and California croton during the end of the species' flowering period. This
 also allowed time for the annual grasses onsite to die back and expose any short stature dune community
 plants growing underneath, such as San Francisco spineflower and California croton. No rare plants were
 observed during this survey.

Table 1 depicts and inventory of plant species observed on the 590 Leland Avenue project site during the three protocol-level surveys performed by ESA on May 2, May 18, and July 7, 2017.

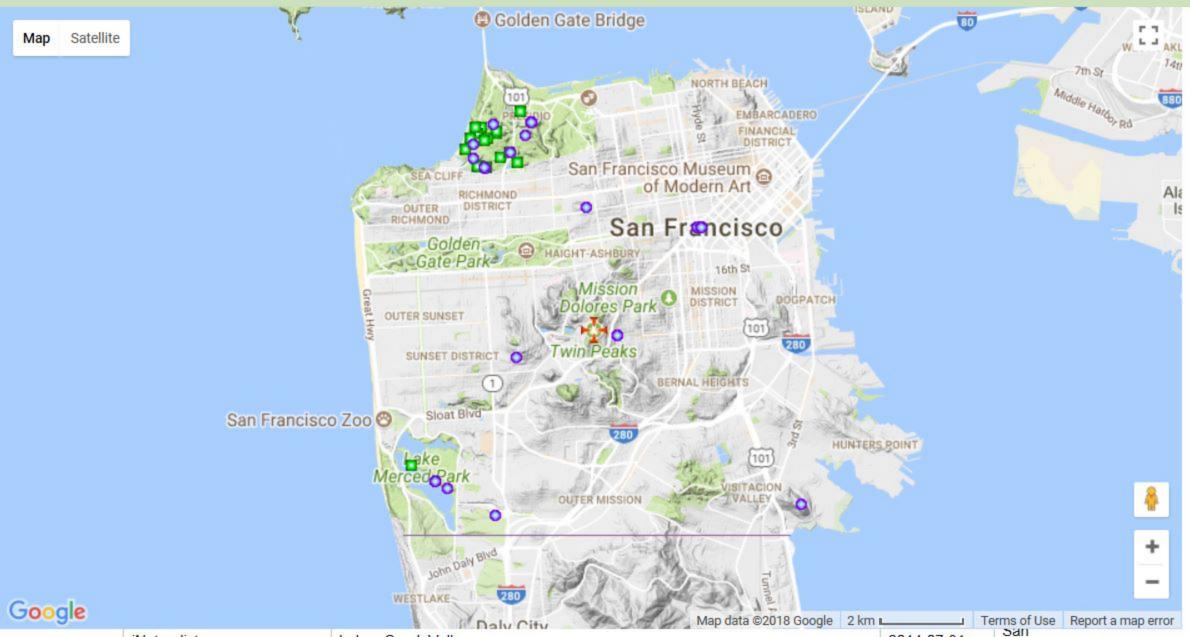
Scientific Name	Common Name
Aloe vera	aloe vera
Arum sp.	arum lily
Avena barbata	slender oat
Bromus diandrus	ripgut brome
Briza maxima	rattlesnake grass
Canna sp.	canna lily
Carpobrotus edulis	Iceplant
Conium maculatum	poison hemlock
Cortaderia jubata	pampas grass
Cotoneaster spp.	Cotoneaster
Cynodon dactylon	Bermuda grass
Erigeron canadensis	Canada horseweed

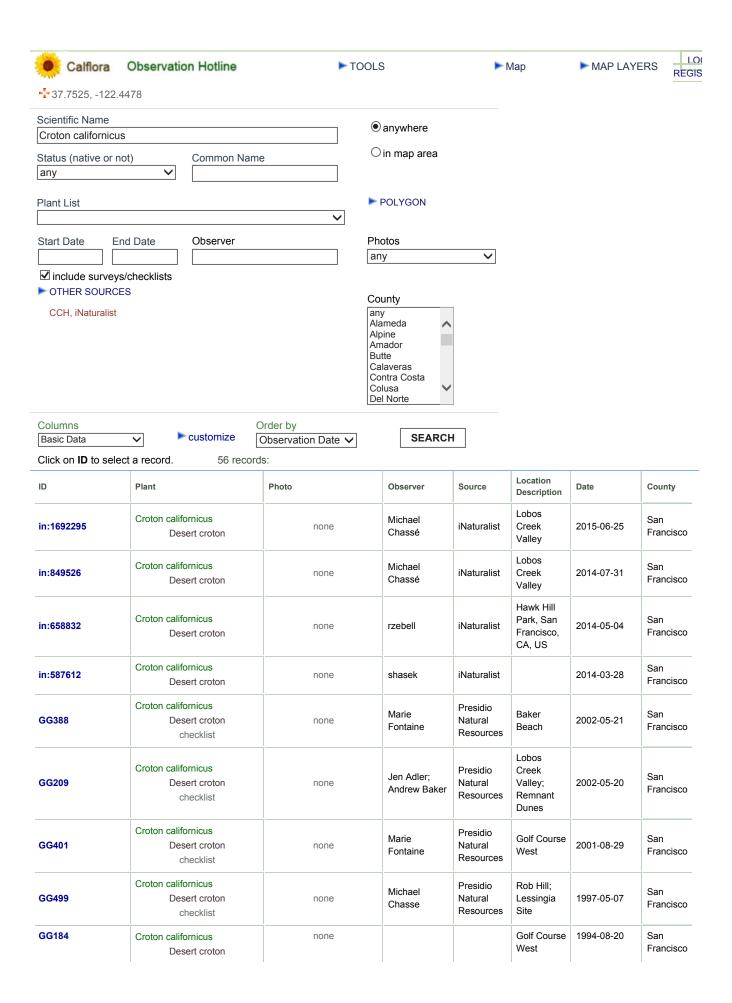
⁴ Michael Vasey, Ph.D., letter to San Francisco Planning Commission, December 28, 2016.

Scientific Name	Common Name
Escallonia sp.	Redclaws
Eucalyptus sp.	Eucalyptus
Foeniculum vulgare	Fennel
Hedera helix	English ivy
Hypochaeris radicata	rough cat's ear
Juniperus communis	Juniper
Lactuca serriola	prickly lettuce
Lobularia maritima	sweet alyssum
Malva parviflora	cheeseweed mallow
Pittosporum spp.	cheesewood trees and shrubs
Plantago lanceolata	English plantain
Platanus racemosa	California Sycamore
Pseudognaphalium luteoalbum	Jersey cudweed
Quercus agrifolia	coast live oak
Pinus radiata	Monterey pine
Raphanus sativus	wild radish
Rubus armeniacus	Himalayan blackberry
Rubus ursinus	California blackberry
Rumex acetosella	sheep sorrel
Solanum nigrum	black nightshade
Sonchus asper	prickly sow thistle
Syringa vulgaris	lilac bush

Conclusions

Vegetation within the 590 Leland Avenue project site is comprised primarily of ornamental landscaping around the existing church building and non-native and invasive plant species in the undeveloped, northern portion of the site. This undeveloped portion of the project site has sandy soils and areas of sparse vegetation which was considered by Dr. Vasey to be remnant coastal dune scrub habitat with potential to host dune community rare plants. While this area has some characteristics consistent with stabilized interior dunes, non-native annual grasses (rattlesnake grass and slender oat) and iceplant were the dominant species in this portion of the project site during the 2017 surveys. These species are known to be invasive and competitive, resulting in inhospitable habitat conditions for rare species, including San Francisco spineflower and California croton. Because the three protocol-level rare plant surveys of the 590 Leland Avenue project site in 2017 were negative for San Francisco spineflower and California croton, and suitable habitat for these species is not present, ESA concludes that no further action is required to identify the presence of these or other rare plants on the site in 2017. While it is unlikely that either San Francisco spineflower or California croton would colonize the site in the future given the unsuitable habitat conditions within the project site, should project construction not be initiated within two years (by spring 2019), rare plant surveys of the 590 Leland Avenue project site should be repeated.





Calflora	Observation Hotline	► TOOLS	Eva Gnotkopp;	Presidio Natural	Иар	► MAP LAY	ERS
30			Ellen Fusco	Resources	: :		RE
iG314	Croton californicus Desert croton checklist	none	Maria Alvarez; P. Vander Leeden	Presidio Natural Resources	Horse Stables	1994-06-08	San Francisco
GG126	Croton californicus Desert croton checklist	none	Dale Smith; Pete Holloran; Ingrid Cabada	Presidio Natural Resources	Southwest Dunes	1994-06-01	San Francisco
G116	Croton californicus Desert croton checklist	none	Dale Smith; Ingrid Cabada; Pete Holloran	Presidio Natural Resources	Dune Corridor East of Lincoln	1994-05-22	San Francisco
G672	Croton californicus Desert croton checklist	none	Sharon Farrell; Wende Reulaender	Presidio Natural Resources	Central Magazine	1994-06-14	San Francisco
e231	Croton californicus Desert croton checklist	none	Juan Ochoa, Christopher Campbell, and Paul Pribor	San Francisco State University	Flora of Lake Merced	2005-01-01	San Francisco
G547	Croton californicus Desert croton checklist	none	Mike Vasey; Isabelle DeGeoffrey	Presidio Natural Resources	Lobos Creek Valley; New Dunes	1994-01-01	San Francisco
G614	Croton californicus Desert croton checklist	none	Peter Rubtzoff	Presidio Natural Resources	North Baker Beach	1958-01-01	San Francisco
GG612	Croton californicus Desert croton checklist	none	Peter Rubtzoff	Presidio Natural Resources	Lobos Creek Valley	1958-01-01	San Francisco
G606	Croton californicus Desert croton checklist	none	Peter Raven	Presidio Natural Resources	Lobos Creek Valley	1954-08-22	San Francisco
iG4	Croton californicus Desert croton checklist	none	Albert Kellogg; W. G. Hardford	Presidio Natural Resources	Lobos Creek Valley	1958-01-01	San Francisco
G440	Croton californicus Desert croton checklist	none	Michael Chasse; Laura Chantri; Ricky Medrano	Presidio Natural Resources	Baker Beach; Battery Chamberlin	2009-04-16	San Francisco
G438	Croton californicus Desert croton checklist	none	Michael Chasse; Laura Chantri; Ricky Medrano	Presidio Natural Resources	Southwest Dunes; Silene Area	2009-04-16	San Francisco
G67	Croton californicus Desert croton checklist	none	Brett Stevenson; Andy Kleinhesselink	Presidio Natural Resources	Southwest Dunes; Wherry Dunes	2008-07-18	San Francisco
G689	Croton californicus Desert croton checklist	none	Tim Doherty; Marie Fontaine; Emily Magnaghi	Presidio Natural Resources	North Baker Beach	2002-05-29	San Francisco
GG357	Croton californicus Desert croton checklist	none	Marie Fontaine; Emily Magnaghi	Presidio Natural Resources	Rob Hill; Top of Battery	2002-06-12	San Francisco

Calflora	Observation Hotline	none TOOLS	Marie Fontaine;	Presidio Natural		〕2002-06-12 ► MAP LAYE	San L Ranciste G
	checklist		Emily Magnaghi	Resources	Site		
GG504	Croton californicus Desert croton checklist	none	Michael Chasse	Presidio Natural Resources	Presidio Hills; Lessingia Recovery	1996-01-01	San Francisco
GG21	Croton californicus Desert croton checklist	none	Andrew Baker; Jennifer Adler	Presidio Natural Resources	Lobos Creek Valley; New Dunes	2002-06-07	San Francisco
GG479	Croton californicus Desert croton checklist	none	Michael Chasse	Presidio Natural Resources	Presidio Golf Course; Golf Course Lessingia S	2002-07-23	San Francisco
GG467	Croton californicus Desert croton checklist	none	Michael Chasse; Rachel Alford; Alyssa Babin	Presidio Natural Resources	Baker Beach	2007-03-29	San Francisco
GG200	Croton californicus Desert croton checklist	none	Hillary Saunders	Presidio Natural Resources	Southwest Dunes; Wherry Dunes	2007-03-12	San Francisco
GG640	Croton californicus Desert croton checklist	none	Sandee Hufana	Presidio Natural Resources	Lobos Creek Valley; Remnant Dunes	2005-05-01	San Francisco
GG634	Croton californicus Desert croton checklist	none	Sandee Hufana	Presidio Natural Resources	Southwest Dunes	2007-05-24	San Francisco
GG69	Croton californicus Desert croton checklist	none	Brett Stevenson; Michael Chasse; Alyssa Babin	Presidio Natural Resources	Baker Beach; Battery Chamberlin	2008-04-10	San Francisco
ech: RSA212512	Croton californicus Desert croton	none	Peter Rubtzoff	Consortium of California Herbaria	Border of marsh on the bottom of gully south of Stanley Drive, east of Lake Merced, San Francisco	1956-08-25	San Francisco
cch: RSA51230	Croton californicus Desert croton	none	P. H. Raven	Consortium of California Herbaria	Bayview Hills.	1950-05-18	San Francisco
och: RSA51364	Croton californicus Desert croton	none	L. S. Rose	Consortium of California Herbaria	Lake Merced	1949-09-07	San Francisco
och: JEPS78980	Croton californicus Desert croton	none	Edward Lee	Consortium of California Herbaria	nw end Lake Merced; San Francisco	1935-06-11	San Francisco

Calflora (Croton californicus Observation, Hotline	none TOO	Lewis S. Rose	of ►N	Mannerced San	1949-09-07 ► MAP LAYI	San L
			1	California Herbaria	Francisco (type locality)	1	
ch: UC450191	Croton californicus Desert croton	none	N. L. Gardner and W. J. V. Osterhous	Consortium of California Herbaria	Lake Merced	1903-06-12	San Francisco
ch: RSA149688	Croton californicus Desert croton	none	George W. Barclay	Consortium of California Herbaria	San Francisco.	1837-11-01	San Francisco
ch: POM87055	Croton californicus Desert croton	none	Marcus E. Jones	Consortium of California Herbaria	San Francisco	1881-07-15	San Francisco
ch: SEINET7113634	Croton californicus Desert croton	none	Marcus E. Jones	Consortium of California Herbaria	San Francisco	1881-01-01	San Francisco
ch: SEINET5788881	Croton californicus Desert croton	none	Marcus E. Jones	Consortium of California Herbaria	San Francisco	1881-01-01	San Francisco
ch: UC17563	Croton californicus Desert croton	none	H. N. Bolander	Consortium of California Herbaria	San Francisco	1863-12-31	San Francisco
ech: UC17558	Croton californicus Desert croton	none	Jos. Burtt Davy	Consortium of California Herbaria	San Francisco	1895-12-31	San Francisco
cch: JEPS52465	Croton californicus Desert croton	none	W. L. Jepson	Consortium of California Herbaria	San Francisco	1891-08-20	San Francisco
cch: JEPS52455	Croton californicus Desert croton	none	W. L. Jepson	Consortium of California Herbaria	Mountain Lake San Francisco	1894-10-31	San Francisco
ch: UC334106	Croton californicus Desert croton	none	Kellogg and Harford	Consortium of California Herbaria	Lone Mtn. S. Francisco	1877-05-31	San Francisco
ch: RSA256403	Croton californicus Desert croton	none	Robert A. Norris	Consortium of California Herbaria	East of Baker Beach between Lobos Creek and conifer forest, San Francisco	1974-07-07	San Francisco
cch: RSA212511	Croton californicus Desert croton	none	Peter Rubtzoff	Consortium of California Herbaria	Presidio. Area above Bakers Beach, near Lincoln Boulevard.	1957-10-13	San Francisco
ech:SBBG33910	Croton californicus Desert croton	none	L. S. Rose	Consortium of	San Francisco, Presidio,	1969-09-11	San Francisco

Calflora	Observation Hotline	► TOOLS	8	California Herbaria N	above golf 相解ks	► MAP LAY	ERS REGI
cch: UCD141939	Croton californicus Desert croton	none	D. Kelch	Consortium of California Herbaria	San Francisco, Presidio near Magazine Rd.	1994-10-12	San Francisco
cch: POM203491	Croton californicus Desert croton	none	L. S. Rose	Consortium of California Herbaria	Presidio	1933-10-21	San Francisco
cch: HSC7966	Croton californicus Desert croton	none	L. S. Rose,	Consortium of California Herbaria	Presidio	1969-09-11	San Francisco
cch: OBI14411	Croton californicus Desert croton	none	Lewis S. Rose	Consortium of California Herbaria	Presidio	1959-01-01	San Francisco
cch: UCD141956	Croton californicus Desert croton	none	Lewis S. Rose	Consortium of California Herbaria	Presidio.	1959-06-19	San Francisco

Table 3-5. Sensitive species presently and historically known to occur at Significant Natural Areas.

Species	Common Name	Status Federal,	own to occur at Significant Natural Areas. Local Significance
,		State, CNPS, Local	J
Fish			
Eucyclogobius newberryi	Tidewater Goby	FPD (FE), CSC	Historically collected (1895), not recently observed in the Cily
Reptiles and Amph	ibians		
Clemmys marmorata	Western Pond Turtle	CSC	Presently occurs at Lake Merced. Presumed extant at Pine Lake but not recently observed.
Rana aurora draytonii	California Red-legged Frog	FT	Historically observed at Lake Merced. Recently observed at Sharp Park.
Thamnophis sirtalis elegans	San Francisco Garter Snake	FE, SE, SFP	Historically reported from Sharp Park
Invertebrates			
Caecuditea tomalensis	Tomales Isopod	FSC	Collected in 1984 from Lake Merced (CNDDB 2000)
Euphydryas editha bayensis	Bay Checkerspot Butterfly	FT	Reported from Mt. Davidson and Twin Peaks in 1980. Not currently present at either Natural Area.
Icaricia icarioides missionensis	Mission Blue Butterfly	FE	Reported at Sharp Park and McLaren Park in 1988 and from Bayview Park in 2001. Currently breeds on Twin Peaks
Incisalia mossii bayensis	San Bruno Elfin Butterfly	FE	
Ischnura gemina	San Francisco Forktail Damselfly	-	Not observed since 1989, presumed present in Glen Canyon. Presently occurs in McLaren Park.
Lichnanthe ursina	Bumblebee Scarab Beetle	FSC	1980 report from dunes near Laguna Salada, presumed present
Speyeria callippe callippe	San Francisco Silverspot Butterfly	FE	
Plants			
Amsinckia menziesii var. intermedia	Common Fiddleneck	LS	Presently occurs at Bayview Park, and Twin Peaks
Aquilegia formosa	Red Columbine	LS	Presently occurs at Glen Canyon, O'Shaughnessy Hollow, and Mount Davidson
Arabis blepharophylla	Coast Rock Cress	CNPS List 4	Presently occurs at Mt. Davidson, O'Shaughnessy Hollow, and Twin Peaks
Arctostaphylos hookeri ssp. franciscana	Franciscan manzanita	CNPS List 1A	Historically occurred at Mt. Davidson
Arctostaphylos hookeri ssp. ravenii	Raven's manzanita	FE, SE, CNPS List 1B	Historically occurred at Mt. Davidson
Aristolochia californica	California Pipevine	-	Presently occurs at occur at Lake Merced
Aster radulinus	Broadleaf Aster	LS	Presently occurs at Bayview Park
Astragalus nutalli var. virgatus	Nuttall's Milk Vetch	LS	Historically occurred at Lake Merced
Blennosperma nanum	Common Stickyseed	LS	Presently occurs at Bayview Park
Calamagrostis nutkaensis	Pacific Reed Grass	LS	Southern range limit, presently occurs at Mt. Davidson, Twin Peaks, and Edgehill Mtn.
Castilleja exserta	Purple Owl's Clover	LS	Presently occurs at Mount Davidson and Glen Canyon
Castilleja wightii	Paintbrush	LS	Presently occurs at Hawk Hill, Lake Merced, and Balboa Natural Area.

Table 3-5. Sensitive species presently and historically known to occur at Significant Natural Areas.						
Species	Common Name	Status Federal, State, CNPS, Local	Local Significance			
Cerastium arvense	Meadow White	LS	Presently occurs at Twin Peaks and Rock Outcrop			
Chenopodium californicum	California Goosefoot	LS	Historically occurred at Lake Merced			
Chorizanthe cuspidata var. cuspidata	San Francisco Spineflower	FSC, CNPS List 1B	Presently occurs at Ft. Funston, Golden Gate Heights, and Lake Merced			
Clarkia rubicunda	Farewell-to-Spring	-	Presently occurs at Tank Hill, Bayview Hill, and Lakeview/Ashton Mini Park			
Collinsia multicolor	San Francisco Collinsia	CNPS List 1B	Presently occurs at Bayview Hill			
Croton californica	California Croton	LS	Northern distributional limit, presently occurs at Hawk Hill			
Delphinium californicum	Larkspur	LS	Presently occurst at Bayview Park			
Delphinium decorum	Coast Larkspur	LS	Presently occurs at Bayview Park			
Deschampsia danthonioides	Annual Hairgrass	LS	Presently occurs at Corona and Rock Outcrop			
Disporum hookeri	Fairy Bells	LS	Presently occurs at Interior Green Belt			
Dodecatheon clevelandii	Shooting Star	LS	Presently occurs at Bernal Hill.			
Elymus multisetus	Big Squirrel Tail	LS	Presently occurs at Bayview Park, Bernal Hill and McLaren Park			
Erigeron foliosus	Leafy Daisy	LS	Presently occurs in O'Shaughnessey Hollow			
Erysimum franciscanum	San Francisco Wallflower	FSC, CNPS List 4	Presently occurs at Grandview Park, Golden Gate Heights, Hawk Hill, and Rock Outcrop			
Euthamia occidentalis	Western Goldenrod	LS	Historically reported not recently observed in the City.			
Festuca californica	California Fescue	LS	Presently occurs at Bayview Park, Edgehill Mtn. and Mt. Davidson			
Frankenia salina	Alkali-Heath	LS	Presently occurs at India Basin Shoreline Park.			
Fritillaria liliacea	Fragrant Fritillary	CNPS 1B	Presently occurs at Bernal Heights			
Gallium porrigens	Climbing Bedstraw	LS	Presently occurs in Bayview Park , O'Shaughnessy Hollow, and Twin Peaks			
Garrya elliptica	Silk Tassel Bush	LS	Presently found in Glen Canyon Park			
Gilia capitata ssp. chamissonis	Dune Gilia	CNPS List 1B	Presently occurs at Hawk Hill and Lake Merced			
Gilia clivorum	Grassland Gilia	LS	Historically reported not recently observed in the City.			
Grindelia hirsutula var. maritima	San Francisco Gumplant	FSC, CNPS List 1B	Presently occurs at Mount Davidson, Twin Peaks, Corona Heights, and Balboa Natural Area.			
Grindelia stricta var. augustifolia	Marsh Gumplant	-	Presently occurs at India Basin Shoreline Park.			
Heuchera micrantha	Alumroot	LS	Presently occurs at O'Shaughnessy,and Glen Canyon			
Juncus xiphiodes	Iris Leaf Rush	LS	Historically reported not recently observed in the City.			
Layia carnosa	Beach Layia	FE, SE, CNPS List 1B	Historically reported from San Francisco, location not well mapped, presumed extirpated			
Lessingia germanorum	San Francisco Lessingia	FE, SE, CNPS List 1B	Only current population found on the Presidio.			
Leymus x vancouverensis	Vancouver's Ryegrass	LS	Presently occurs at Lake Merced			
Lilaea scilloides	Flowering Quillwort	LS	Presently occurs at McLaren Park (is likely extripated)			

Lithophragma heterophylla Prarie Star, Woodland Star LS Presently Presently Presently Presently Office Star, Woodland Star Marah oreganus Wild Cucumber, Manroot LS Presently Presently Office Star, Woodland Star Monardella undulata Curly-leaved Monardella CNPS List 4 No Muilla maritima Common Muilla LS Presently Office Star, Woodland Presently Office Star, Woodland Star Navarretia squarrosa Skunkweed LS Presently Office Star, Woodland Monardella Navarretia squarrosa Skunkweed LS Presently Office Star, Woodland Star Navarretia squarrosa Skunkweed LS Presently Office Star, Woodland Star Osmorbiza chilensis Coffee Fern LS Presently Office Star, Woodland Star Pellaea andromedifolia Holly-leaved Cherry LS Presently Office Star, Woodland Star Prunus emarginata Bitter Cherry LS Presently Office Star, Woodland Star Prunus virginiana var. demissa Western Choke Cherry LS Presently Office Star, Voodland St	ur at Significant Natural Areas. Local Significance
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camphoratum	istributional limit. Presently occurs at v Park, Golden Gate Heights, Hawk Outcrop, Lake Merced, and Balboa Natural Area.
Triphysaria eriantha var. Johnny-tuck LS Pres	sently occurs at McLaren Park

Table 3-5. Sensitive species presently and historically known to occur at Significant Natural Areas.

Species	Common Name	Status Federal, State, CNPS, Local	Local Significance
Vaccinium ovatum	California or Evergreen Huckleberry	LS	Presently occurs at Mount Davidson
Viola adunca	Blue Violet	LS	Presently occurs at Glen Canyon, Twin Peaks and O'Shaugnessy
Viola pedunculata	Johnny-Jump-Up	-	Larval food plant for San Francisco silverspot butterfly, presently occurs at Bayview Hill, McLaren Park, Tank Hill, Duncan-Castro, and Corona Heights
Woodwardia fimbriata	Giant Chain Fern	LS	Presently occurs at Glen Canyon
Zigadenus fremontii	Star Lily	LS	Presently occurs at Bernal Hill

Status Key:

- Federal Status FE Endangered. Species in danger of extinction throughout all or significant portion of its range.
 - FT Threatened. Species likely to become endangered within foreseeable future throughout all or a significant portion of its range.
 - FPE Proposed for listing as endangered.
 - FC Candidate for listing as endangered. Candidate information now available indicates that listing may be appropriate with supporting data currently on file.
 - FSC Species of Concern. Former Category 2 Candidate for listing as endangered.
 - FPD Proposed de-listing.

California State Status

- SE Endangered. Species whose continued existence in California is jeopardized.
- ST Threatened. Species, although not presently threatened with extinction, that is likely to become endangered in the foreseeable future.
- SSC Species of Concern.
- SFP State Fully Protected under Sections 3511 and 4700 of the Fish and Game Code.
- Sens Considered a sensitive species by the California Department of Forestry.

California Native Plant Society

- 1A Plants presumed extinct in California
- 1B Plants that are rare or endangered in California and elsewhere.
- 2 Plants that are endangered in California, but more common elsewhere.
- 3 Plants about which more information is needed.
- 4 Plants of limited distribution (a watch list).
- LS Locally Significant.

Golden Gate Audubon Society

SLC Species of Local Concern



California Croton

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Croton californicus







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About California Croton (Croton californicus)

Croton californicus is a species of croton known by the common name California croton. This plant is a perennial or small shrub not exceeding a meter in height. The plant produces long oval-shaped leaves a few centimeters long and covered in a light-colored coat of hairs. This species is dioecious, with individual plants bearing either male (staminate) or female (pistillate) flowers, both only a few millimeters across. The staminate flowers are tiny cups filled with thready yellowish stamens and the pistillate flowers are the rounded, lobed immature fruits surrounded by tiny pointed sepals. This plant is native to California, Nevada, Utah, Arizona, and Baja California, where it grows in the deserts and along the coastline.

Plant Description

Plant TypePerennial herbMax. Height3.3 ft (1 m)Flower ColorGreen

Flowering Season Spring, Summer

Native Status Native

Natural Setting

Site Type Sandy places, dunes, washes

Sun Sun

Elevation? -191' - 6808'

Annual Precip.? 2.5" - 46.1"

Summer Precip.? 0.14" - 2.31"

Coldest Month? 39.3° F - 62.0° F

Hottest Month? 59.2° F - 89.5° F

Humidity? 0.47 vpd - 47.01 vpd

Soil Description Prefers sand or decomposed granite

Drainage Fast

Sunset Zones ? 15, 16, 17, 18, 19, 20, 21, 22, 23, 24

Landscaping Information

Ease of Care Moderately Easy

Water Requirement ? Low

Nursery Availability Commonly Available

Nurseries Moosa Creek Nursery, Rancho Santa Ana Botanic Garden, RECON Native Plants,

S&S Seeds Inc, Stover Seeds

Sources include: Wikipedia. All text shown in the "About" section of these pages is available under the Creative Commons Attribution-ShareAlike License. Plant observation data provided by the participants of the California Consortia of Herbaria, Sunset information provided by Jepson Flora Project. Propogation from seed information provided by the Santa Barbara Botanical Garden from "Seed Propagation of Native California Plants" by Dara E. Emery. Sources of plant photos include CalPhotos, Wikimedia Commons, and independent plant photographers who have agreed to share their images with Calscape. Other general sources of information include Calflora, CNPS Manual of Vegetation Online, Jepson Flora Project, Las Pilitas, Theodore Payne, Tree of Life, The Xerces Society, and information provided by CNPS volunteer editors, with special thanks to Don Rideout. Climate data used in creation of plant range maps is from PRISM Climate Group, Oregon State University, using 30 year (1981-2010) annual "normals" at an 800 meter spatial resolution.

Links: Jepson eFlora Taxon Page CalPhotos Wikipedia Calflora

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CROTON CALIFORNICUS

CALIFORNIA CROTON

Height: 1 ft - 5 ft

Life Cycle: perennial

Growth Type: flower

Flower Size: minute

Flower Type: inconspicuous

Bloom Type: summer

Flower Color: green

Native to California: YES

California Range: coast - desert - inland

Water Requirements: low

• Characteristics / Comments: found in washes/riparian areas

Fire Resistant / Low Fuel: TRUE

Average Live Seed per Bulk Pound: 6,988







TAXON REPORT DATA FROM CALFLORA (HTTP://CALFLORA.ORG/)

RECOMMENDED SOURCE FOR PHOTOS:

View Croton californicus at Calflora.com (http://www.calflora.org/cgi-bin/species_query.cgi?where-calrecnum=2434)

Other Sources: Picasa (https://picasaweb.google.com/lh/view?q="Croton californicus") | Flickr (http://www.flickr.com/search/?q="Croton californicus") | Google Images (http://images.google.com/images?hl=en&q="Croton californicus")



Bloom Months (Blooming months in blue)

CROTON CALIFORNICUS

Common Name: Desert croton

Croton californicus, a dicot, is a perennial herb that is native to California.

US Distribution:	beyond CA but confined to w. North America
Plant Community(s):	Coastal Sage Scrub, Coastal Strand, Chaparral, Creosote Bush Scrub
Habitat:	coastal
Family:	Euphorbiaceae

Recognized as current in TJM2 (http://ucjeps.berkeley.edu/cgi-bin/LN2C.pl?genus=Croton californicus) + PLANTS (http://plants.usda.gov/java/nameSearch?mode=Scientific+Name&keywordquery=Croton californicus) + JM93 (http://ucjeps.berkeley.edu/cgi-bin/get_JM_treatment.pl?Croton californicus)

COUNTY DISTRIBUTION LIST:

ContraCosta, El Dorado, Imperial, Inyo, Kern, Los Angeles, Monterey, Orange, Riverside, Santa Barbara, San Bernardino, San Diego, San Francisco, San Luis Obispo, Tulare, Ventura



See a detailed Distribution Grid (http://www.calflora.org/entry/dgrid.html?crn=2434) of this plant in Calfornia.

Links: USDA Plants Profile (http://plants.usda.gov/java/nameSearch? mode=Scientific+Name&keywordquery=Croton californicus) | Jepson Herbarium (http://ucjeps.berkeley.edu/interchange.html)

Website references on Google (http://www.google.com/search?q="Croton californicus")

CONTACT (/CONTACT/)

S&S Seeds, Inc. (/contact/) P.O. Box 1275 (/contact/)

Carpinteria, CA. (/contact/)

93014-1275 (/contact/)

Phone: (805) 684-0436

(/contact/)

Fax: (805) 684-2798

(/contact/)

Email: (/contact/)
info@ssseeds.com
(mailto:info@ssseeds.com)

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Croton californicus

California Croton

Plant family: Euphorbiaccae - Spurge

Plant type: Shrub

Plant origin: N/A, California, Floristic Provence of Baja

Rating:

Container	Avail Qty	Add to My List	Price
One Gallon	0		16.99

Add to My List My Plant List 1





Flower Color	Insignificant, Yellow		
Blooming Season	Fall, Summer		
Height	0-1 feet, 1-2 feet, 2-3 feet		
Spread	1-5 feet		
Sun / Shade	(a)		
Monthly Water	> Learn More		
Wildlife Friendliness Rating			
Plant Community	> Learn More		
Coastal Sage Scrub, Co	Coastal Sage Scrub, Coastal Strand, Creosote Bush Scrub		
Best Soil Conditions > Learn More			
Sand			
Special Characteristic	pecial Characteristic		

Plant Highlights

Surf's up! This native Croton can be found growing in the sand near the beach, as well as amidst the coastal sage scrub and desert regions in Southern and Baja California. Croton californicus, also known as Desert Croton or California Croton, thrives in sandy soils and washes. It is an elegant, somewhat low growing perennial plant, with small oval shaped leaves. The growth habit is upright, with a lacey, open appearance. Tiny hairs cover both sides of the leaf and the stems of this plant, lending it an usually pale silvery sheen. California Croton grows 1' to 3', with about the same spread. This native plant needs little supplemental water once established, but may benefit from an occasional dousing in the hottest parts of summer to keep it looking its best. C. californicus flowers between summer and fall, but the yellow blooms are tiny, verging on insignificant. California Croton would add a nice color contrast in a sandy garden alongside plants like sage and sagebrush.

Leave us a comment, your rating and/or your favorite picture

Please share your thoughts with us about this plant. We would like to hear about the good things and the problems. We also would appreciate seeing any photos and have you rate this plant. To leave comments or to rate a plant you must be registered.

Browse for Images

Submit

Comments

No comments for this plant.

Attachment B

View Analysis

• Excerpt from January 18, 2018 Discretionary Review hearing packet

Aerial Photographs





SUBJECT PROPERTY

SAN FRANCISCO
PLANNING DEPARTMENT

Discretionary Review Hearing Case Number 2014.0936DRP 590 Leland Avenue 6243/019; 061, 062, 063, 064 and 065

Leland Avenue Site Photographs





Discretionary Review Hearing Case Number 2014.0936DRP 590 Leland Avenue 6243/019; 061, 062, 063, 064 and 065

SAN FRANCISCO
PLANNING DEPARTMENT

Raymond Avenue Site Photographs



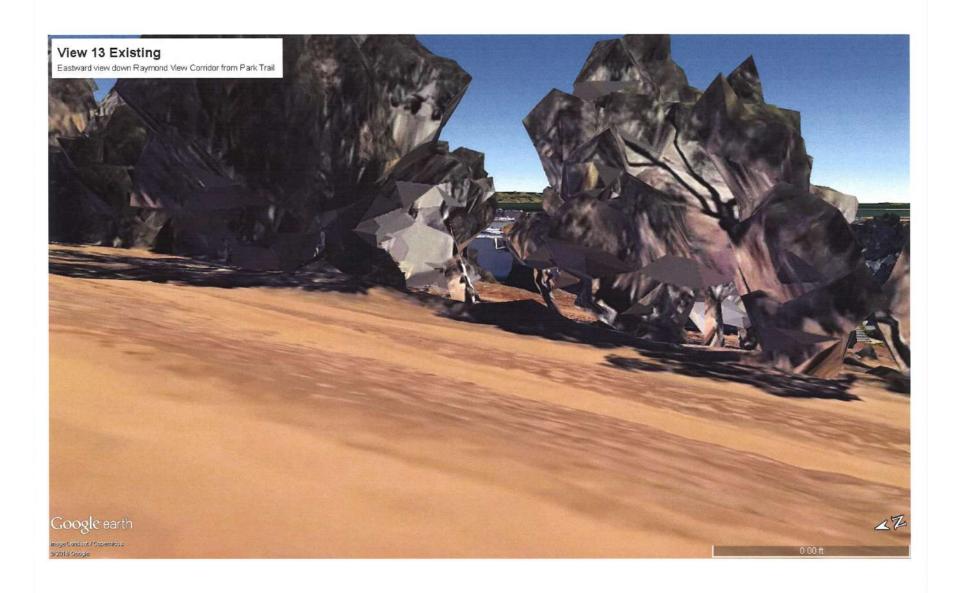


Discretionary Review Hearing Case Number 2014.0936DRP 590 Leland Avenue 6243/019; 061, 062, 063, 064 and 065











3-D RENDERINGS



579-583-589 Raymond Avenue Façade Rendering



586 – 596 Leland Avenue Rendering

VIEW PHOTOGRAPHS



View #1 Leland Avenue Looking West



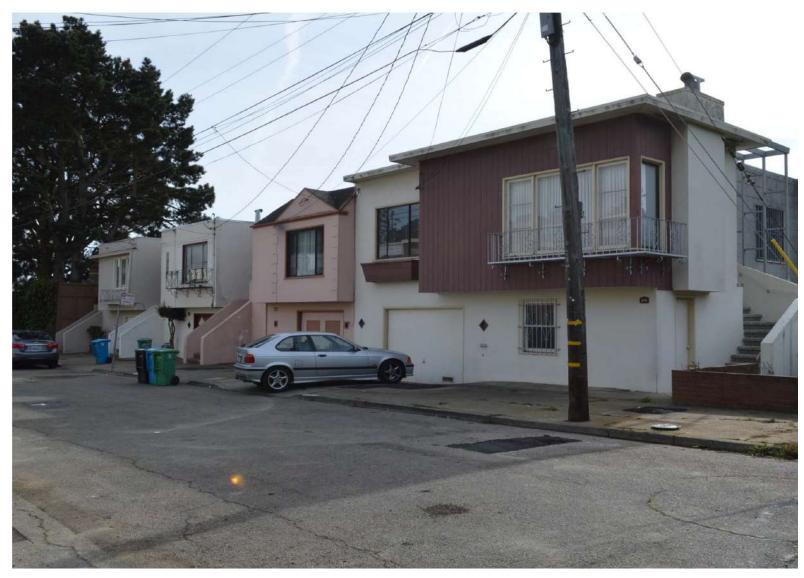
View #3 Raymond Avenue looking west



View #3 579-583-589 Raymond Avenue Existing View



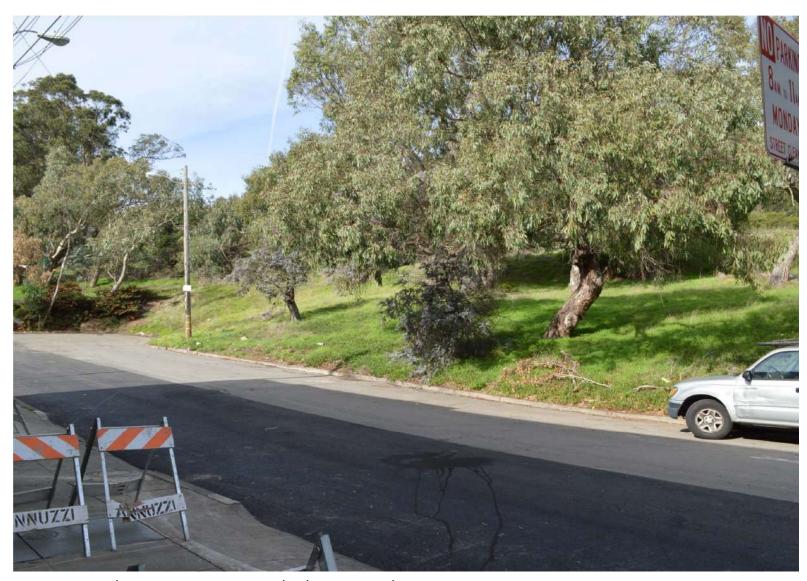
View #4 Vista from Visitacion Avenue Looking East



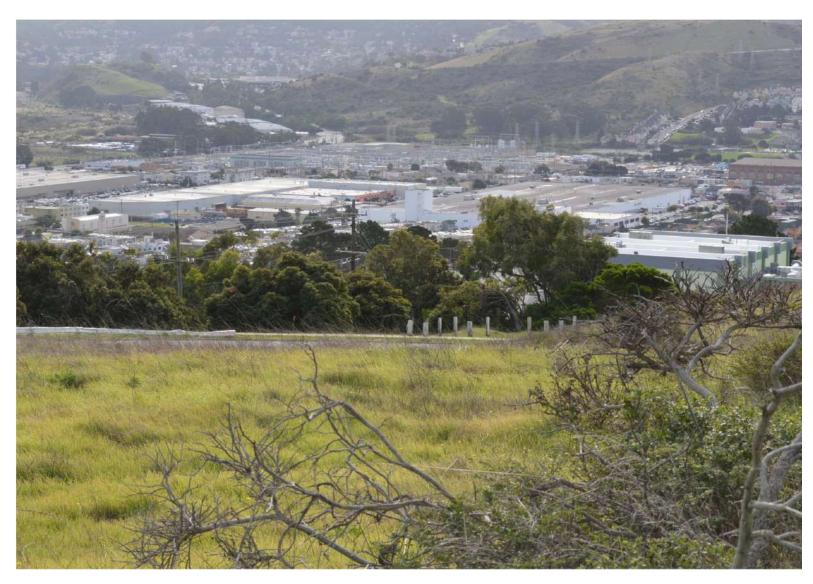
Leland Avenue Opposite Block Face from project site



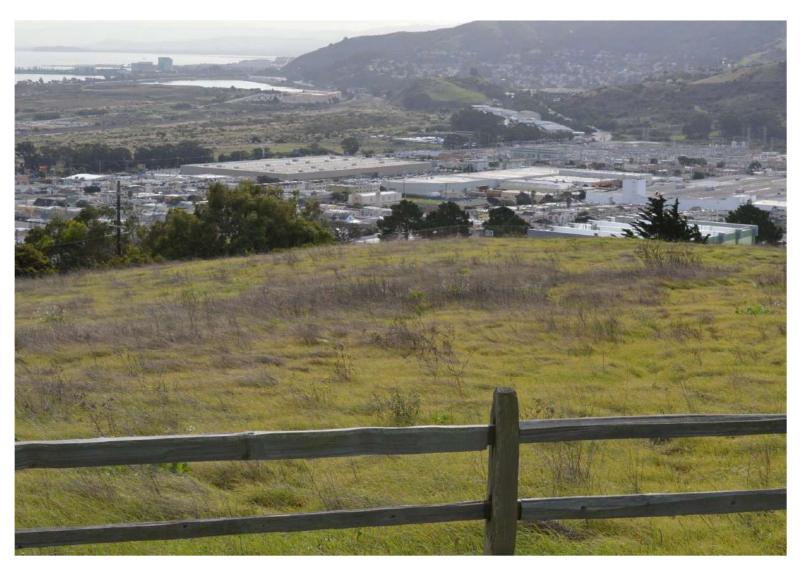
Raymond Avenue Opposite Block Face Looking East



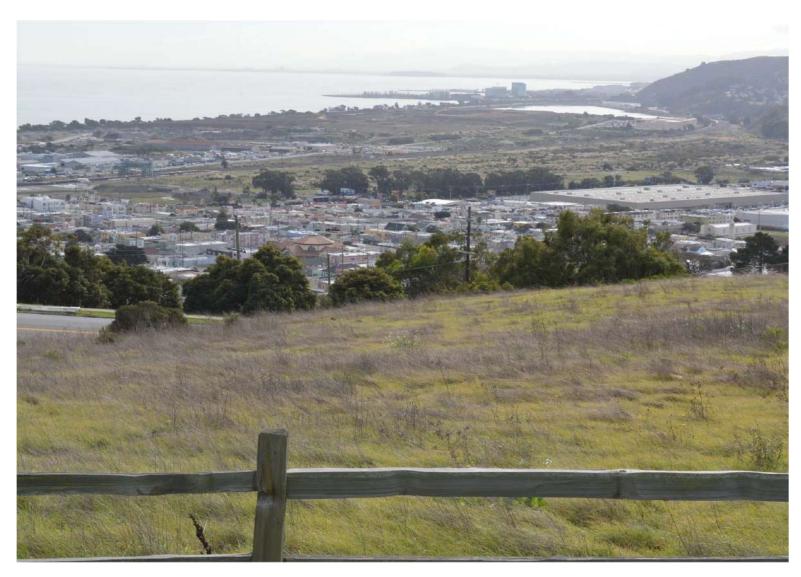
Raymond Avenue Opposite Block Face Looking West



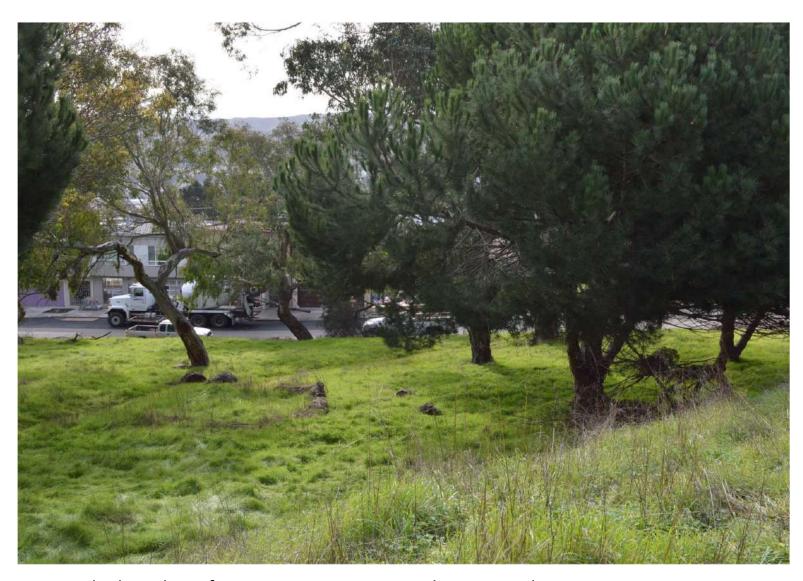
View from Mansell Street Vista Point 1



View from Mansell Street Vista Point 2



View from Mansell Street Vista Point 3



View looking down from Visitacion Avenue to the Raymond Avenue Project Site



View of Project Site from Visitacion Avenue road 1



Views of Project Site from Visitacion Avenue road 2



View of Project Site from Visitacion Avenue road 3

VIEW ANALYSIS



View Study Locations



Leland Avenue View Corridor - Existing



Leland Avenue View Corridor - with Project



Raymond Avenue View Corridor - Existing



Raymond Avenue View Corridor - with Project

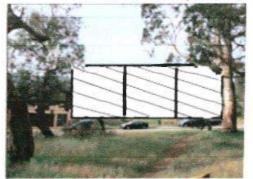


View from Visitacion Sidewalk - Existing/Project (project not visible due to tree cover)

Impact on Views After development Existing

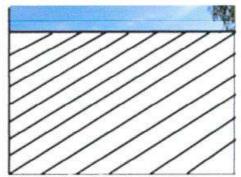






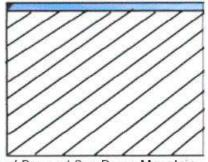
View to South from pathway below V V Middle School





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





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



Similar View as DR Photo Simulation #1 - Existing



Similar View as DR Photo Simulation #1 - with Project

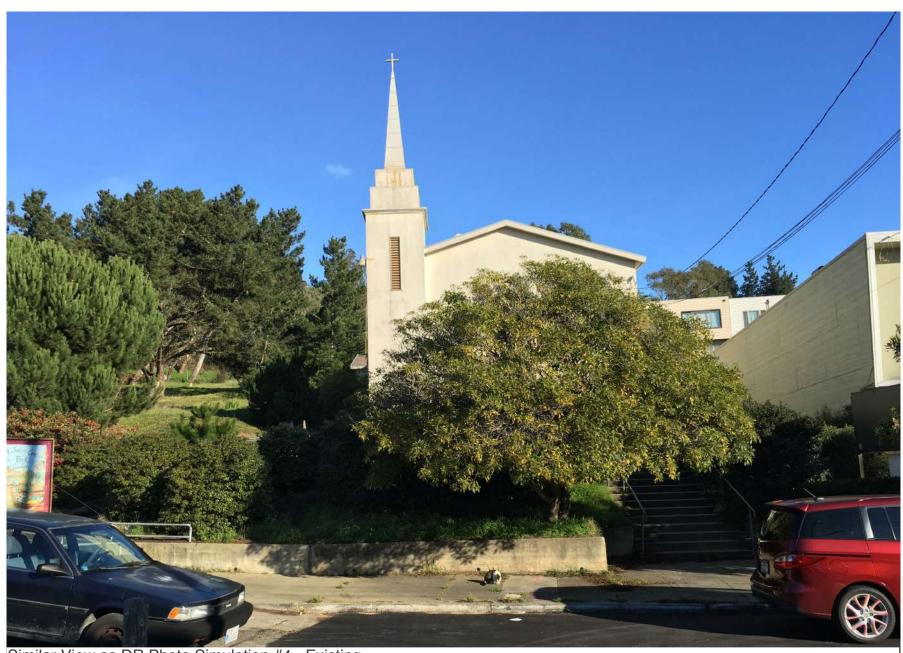




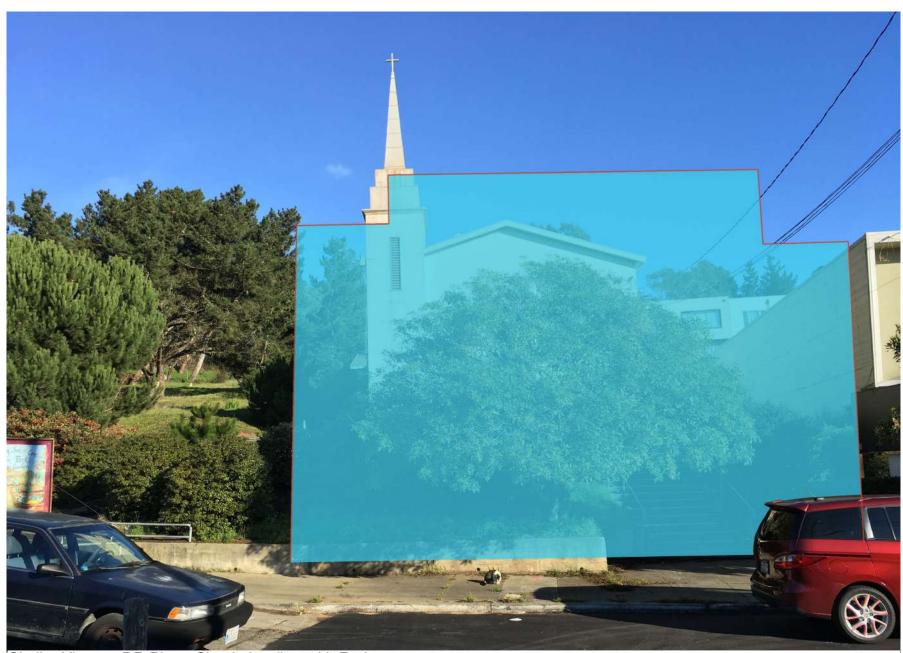


Similar View as DR Photo Simulation #3 - Existing





Similar View as DR Photo Simulation #4 - Existing



Similar View as DR Photo Simulation #4 - with Project