File No. 180179 Committee Item No. _____
Board Item No. 37

COMMITTEE/BOARD OF SUPERVISORS

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Prepared by: Lisa Lew Date: March 29, 2018
Prepared by: _____ Date: _____

Lew, Lisa (BOS)

From: BOS Legislation, (BOS)
Sent: Friday, March 23, 2018 11:54 AM
To: fma6764860@aol.com; vquan.sf@gmail.com
Cc: GIVNER, JON (CAT); STACY, KATE (CAT); JENSEN, KRISTEN (CAT); Rahaim, John (CPC); Gibson, Lisa (CPC); Sanchez, Scott (CPC); Sider, Dan (CPC); Starr, Aaron (CPC); Cooper, Rick (CPC); Pollak, Josh (CPC); Ionin, Jonas (CPC); Calvillo, Angela (BOS); Somera, Alisa (BOS); BOS-Supervisors; BOS-Legislative Aides; BOS Legislation, (BOS)
Subject: RE: HEARING NOTICE: Appeal of CEQA Exemption Determination - 590 Leland Avenue - Appeal Hearing on April 3, 2018

Categories: 180179

Good morning,

On Tuesday, March 20, 2018, the Office of the Clerk of the Board distributed a hearing notice for the appeal of the Exemption Determination under CEQA for the proposed project at 590 Leland Avenue. Pursuant to Administrative Code, Section 31.16(b)(4) the Office of the Clerk of the Board is required to schedule the initial hearing no less than 21 and no more than 45 days of the appeal filing deadline; the regularly scheduled meeting of April 3, 2018, fulfills that obligation.

This email is being sent to notify you that on April 3, 2018, the Board is anticipated to entertain a motion to continue this appeal hearing to April 10, 2018. If a motion is made to continue this matter, on April 3, 2018, public comment will be taken on the continuance and the full discussion and public comment for the appeal will be considered at the April 10, 2018, meeting.

I invite you to review the entire matter on our Legislative Research Center by following the link below:

Board of Supervisors File No. 180179

Please do not hesitate to contact our office if there are any questions or concerns.

Regards,

Brent Jalipa
Legislative Clerk
Board of Supervisors - Clerk's Office
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-7712 | Fax: (415) 554-5163
brent.jalipa@sfgov.org | www.sfbos.org

Click here to complete a Board of Supervisors Customer Service Satisfaction form

From: BOS Legislation, (BOS)
Sent: Tuesday, March 20, 2018 8:38 AM
o: fma6764860@aol.com; vquan.sf@gmail.com
Cc: GIVNER, JON (CAT) <Jon.Givner@sfcityatty.org>; STACY, KATE (CAT) <Kate.Stacy@sfcityatty.org>; JENSEN, KRISTEN (CAT) <Kristen.Jensen@sfcityatty.org>; Rahaim, John (CPC) <john.rahaim@sfgov.org>; Gibson, Lisa (CPC) <lisa.gibson@sfgov.org>; Sanchez, Scott (CPC) <scott.sanchez@sfgov.org>; Sider, Dan (CPC) <dan.sider@sfgov.org>; Starr, Aaron (CPC) <aaron.starr@sfgov.org>; Cooper, Rick (CPC) <rick.cooper@sfgov.org>; Pollak, Josh (CPC) <josh.pollak@sfgov.org>; Ionin, Jonas (CPC) <jonas.ionin@sfgov.org>; Calvillo, Angela (BOS) <angela.calvillo@sfgov.org>; Somera, Alisa (BOS) <alisa.somera@sfgov.org>; BOS-Supervisors <bos-supervisors@sfgov.org>; BOS-Legislative Aides <bos-legislative_aides@sfgov.org>; BOS Legislation, (BOS) <bos.legislation@sfgov.org>
Subject: HEARING NOTICE: Appeal of CEQA Exemption Determination - 590 Leland Avenue - Appeal Hearing on April 3, 2018

Good morning,

The Office of the Clerk of the Board has scheduled a hearing for Special Order before the Board of Supervisors on **April 3, 2018, at 3:00 p.m.**, to hear an appeal of the Determination of Exemption under CEQA for the proposed project at 590 Leland Avenue.

Please find the following link to the hearing notice for the matter.

Hearing Notice - March 20, 2018

I invite you to review the entire matter on our Legislative Research Center by following the link below:

Board of Supervisors File No. 180179

Regards,

Brent Jalipa
Legislative Clerk
Board of Supervisors - Clerk's Office
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-7712 | Fax: (415) 554-5163
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Click here to complete a Board of Supervisors Customer Service Satisfaction form

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, 20140454156 & 201404254152. Case Number 2014.0936E

Primary reasons for requesting appeal:

1. Inaccurate and incomplete biological resources review: 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.

3. Inaccurate and incomplete analysis of interference with sightlines within portions of local parts of McLaren Park, a possible safety issue for local school children and seniors.

4.Inaccurate and incomplete analysis of loss of flat ADA accessible open space.

5. Inaccurate and incomplete analysis of effect of shadows 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.

6. Incomplete analysis of the possibility that all or part of the site, which is on RPD's Acquisition Roster, might have more value as open space in a high needs 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.

VVPA

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

Certificate of Determination
Exemption from Environmental Review

1650 Mission St.
Suite 400
San Francisco,
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Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

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

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

February 12, 2015
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.

Traffic. 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 health- and 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.

Water Quality. 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.

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[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 Department[8] 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.

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[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 an existing rare bio-geographical sand dune and plant life. The neighborhood also hopes to establish an Environmental Education Center with space for non-profit orgtanizations.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 ***General Plan*** 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 culturally significant landscapes, sites, structures, 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 ***McLaren Park****, 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 remnant of the original natural landscape and either supports a significant, diverse, or unusual indigenous plant or wildlife habitat, or contains rare geological formations, or riparian zones.

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

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

...(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, sand dunes, 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.*

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 *ADA accessible* 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 *help build community* by giving neighbors a realm in which to get to know each other, and giving children a safe place to play

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

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

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 andchanging 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, inter-jurisdictional 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

Enviornmental 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. With major efforts in this direction, the City will help reverse past trends toward the destruction of the natural qualities of the environment.*

...(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 ***existing*** 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 ***proposed*** 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.

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.

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.

Question #3)
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 bio-geographical 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

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 bio-geographical 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.

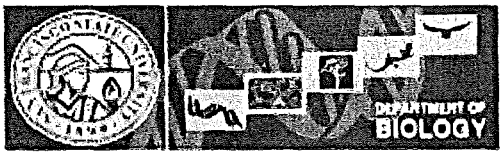
• **Social Justice**: The minority population of Visitacion Valley has been over-shadowed by various interest groups who have had a larger voice in planning for McLaren Park. The City has systematically ignored the needs of the Visitacion Valley community on all levels.
• **Living Lab:** The Native Plant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

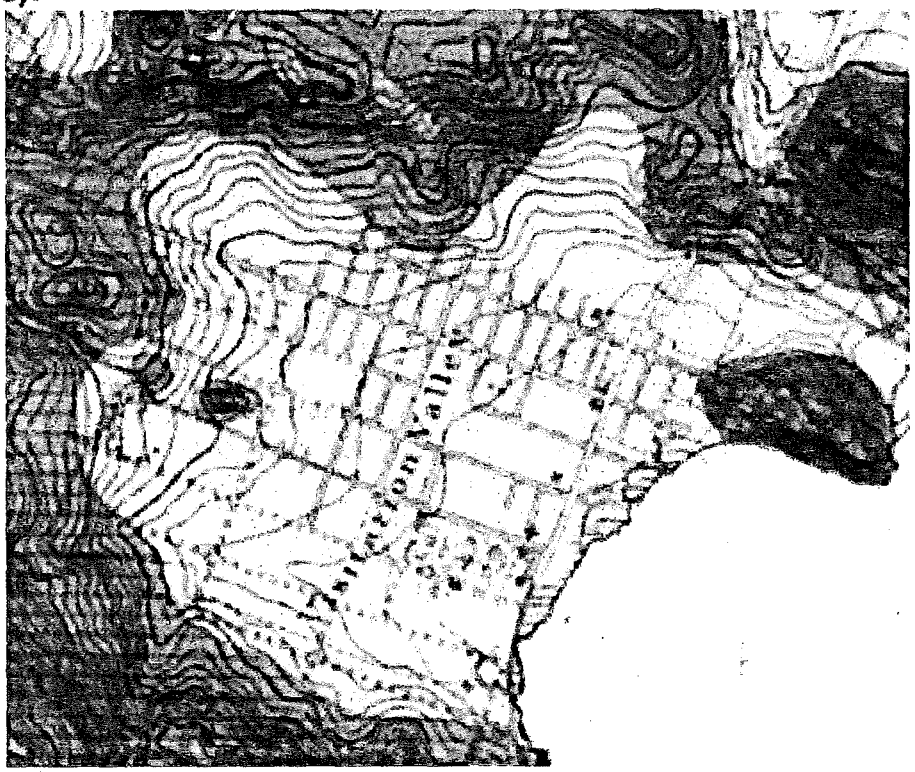
I am writing to alert you to a recent discovery of biological significance at and near 590 Leland Avenue in Visitacion Valley near McLaren Park. The discovery pertains to at least two significant plant species that are indicators of remnant coastal dune habitat that were not reported to exist before 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*

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.

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

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Croton californicus - photo 3838 taken February 16, 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

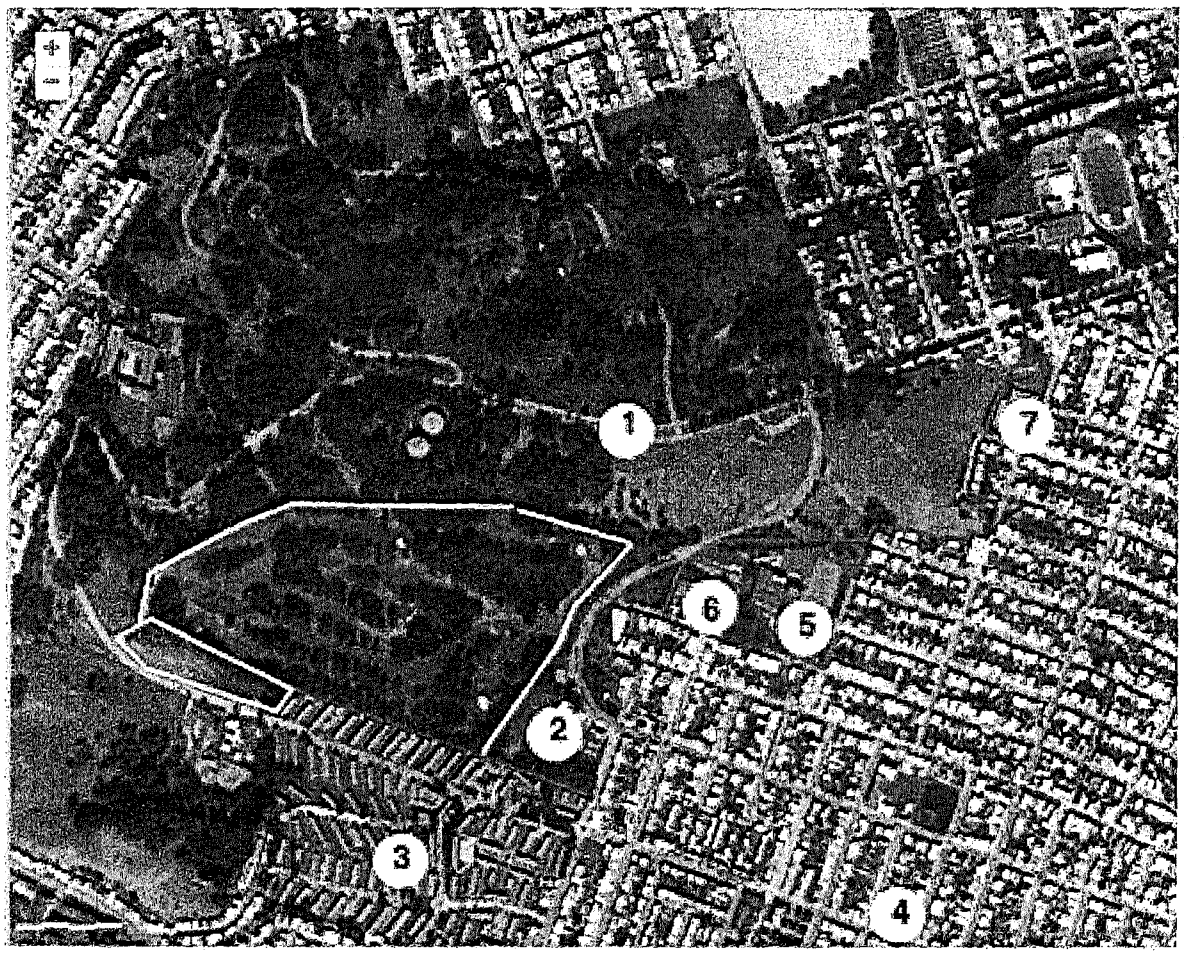
7) PUC Rain Garden

8) Concept Plan for McLaren Park Outdoor Education Center

9) Children, youth and adults who enjoy and support open space in Visitacion Valley.

OVERVIEW

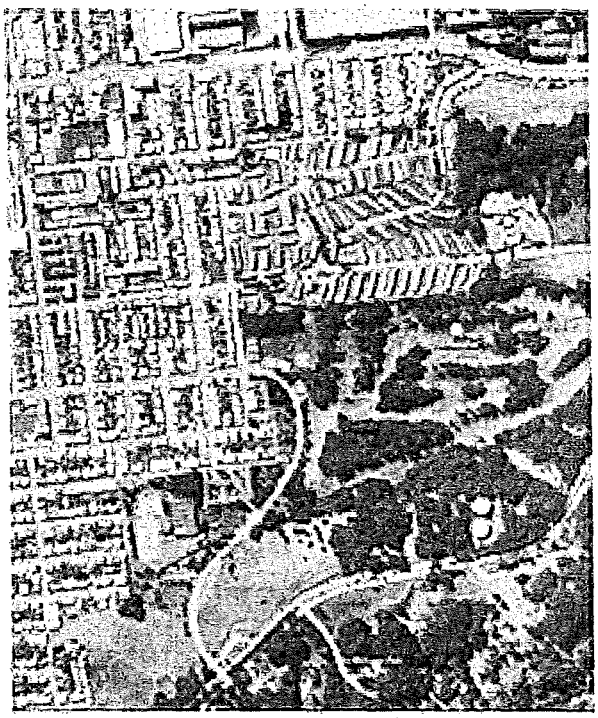
McLaren Park South of Mansell Street
and surrounding conditions in Visitacion Valley



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
- (1) 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

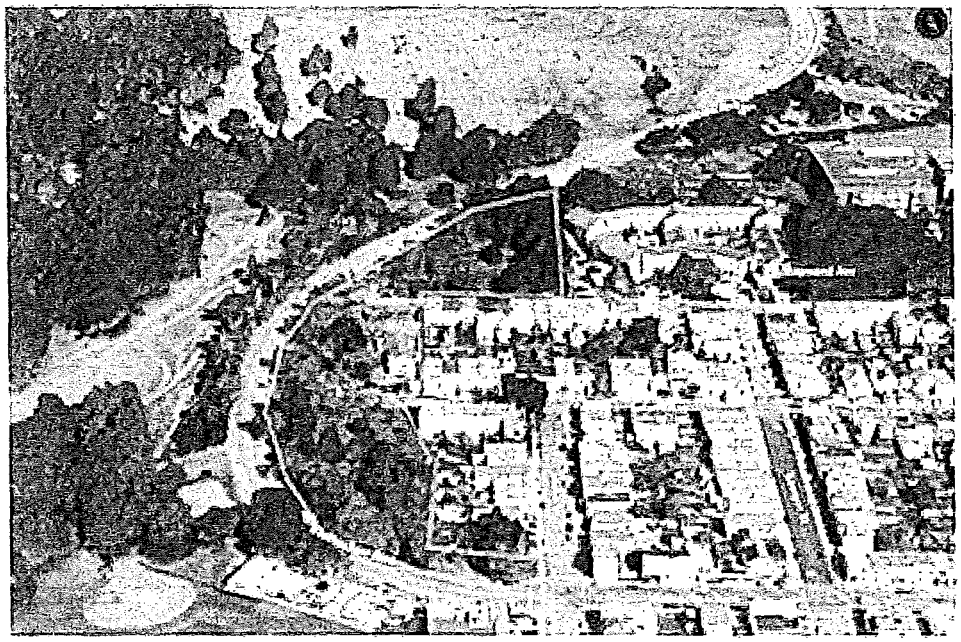
OVERVIEW
590 Leland and Environs

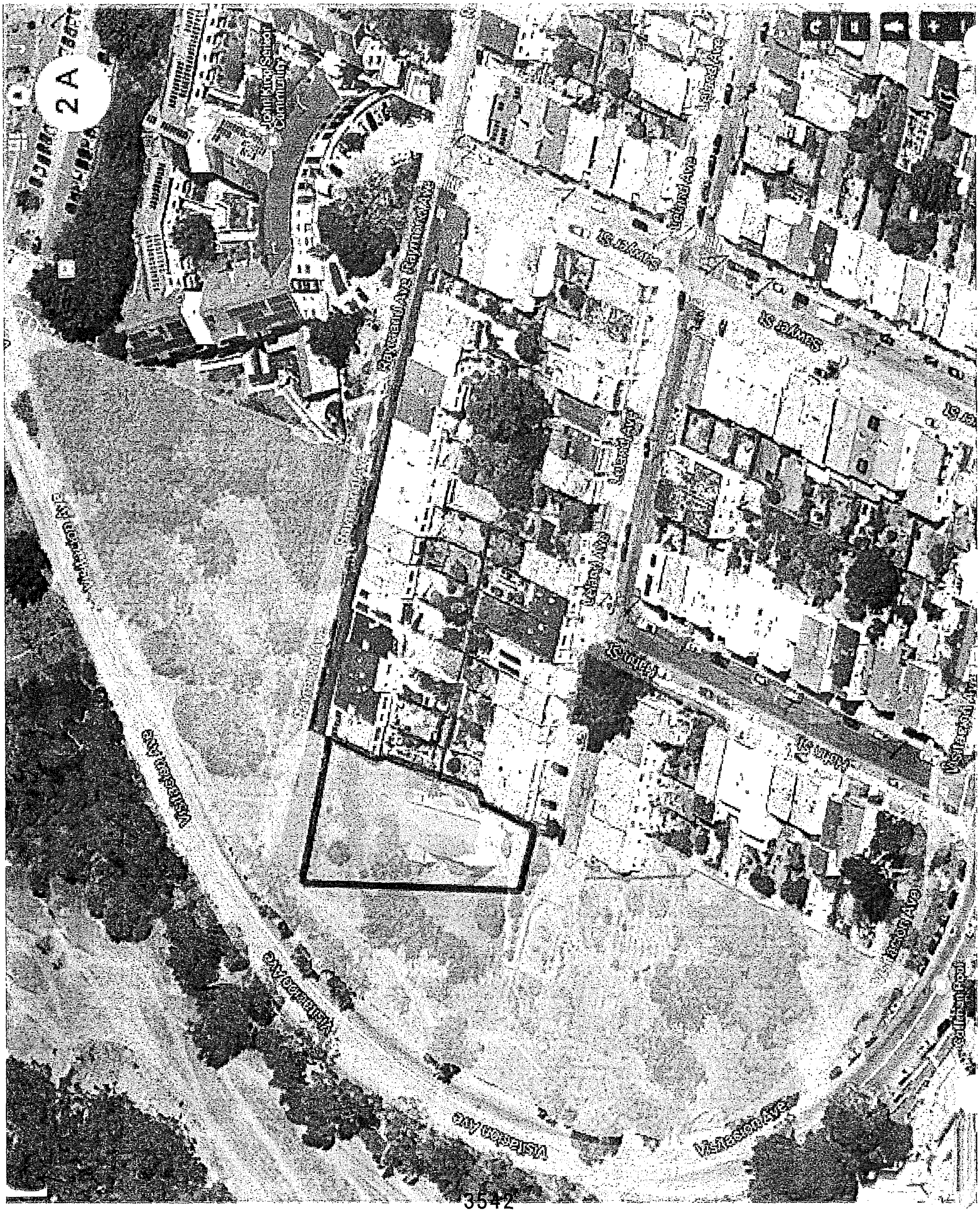


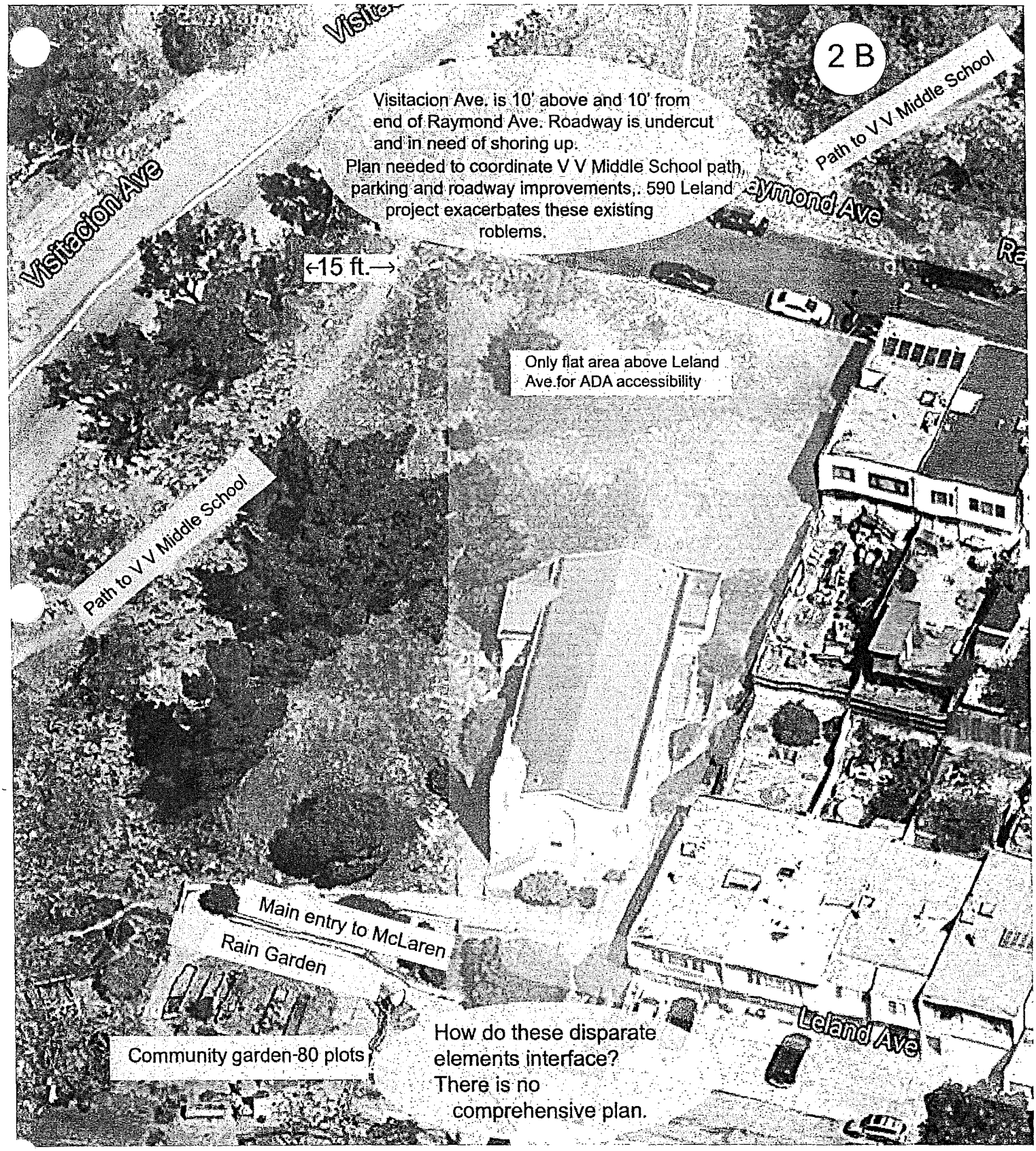
Approximate dimensions of 590 Leland site:

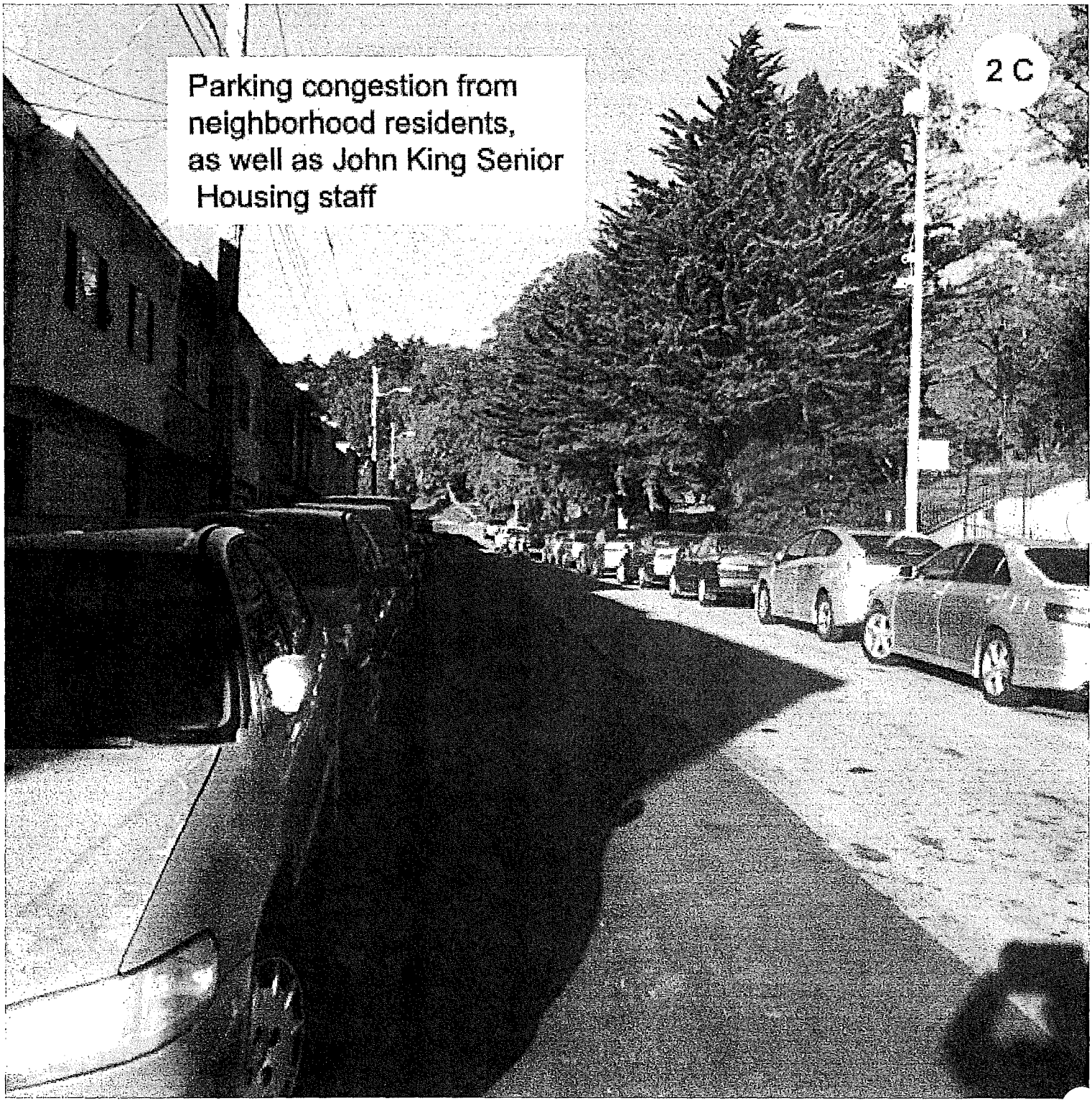
Raymond Ave.	113.5 feet
Leland Ave.	44.1 feet
North to South/East side	198.7 feet
North to South/West side	200.1 feet

590 Leland Avenue site
Community Garden, Rain Garden, entryway to McLaren Park and trail area from VVMS to Hahn Ave.




2A
Visitacion Ave
Sawyer St


2 B
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.
Path to V V Middle School
Visitacion Ave
←15 ft.→
Only flat area above Leland Ave.for ADA accessibility
Path to V V Middle School
Main entry to McLaren
Rain Garden
Community garden-80 plots
How do these disparate elements interface? There is no comprehensive plan.
Leland Ave

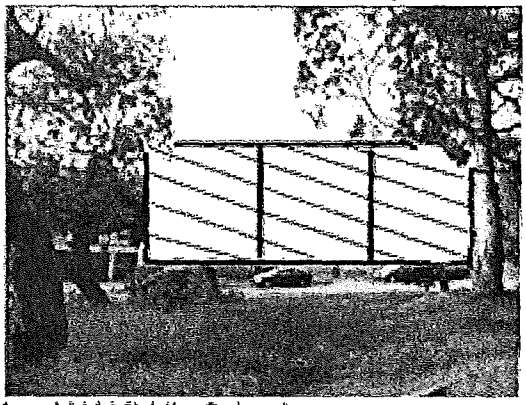

Parking congestion from neighborhood residents, as well as John King Senior Housing staff
2 C

Impact on Views

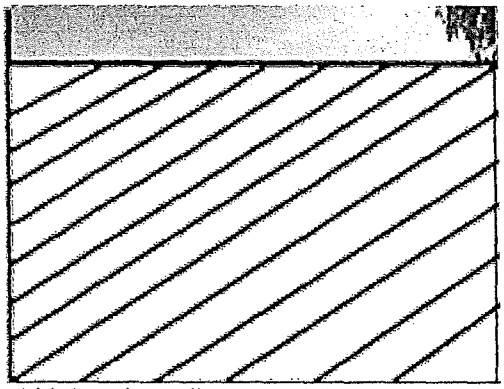
3

Existing

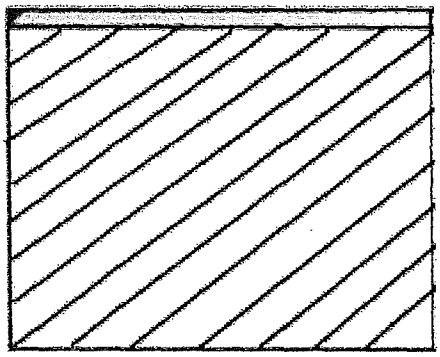
After development



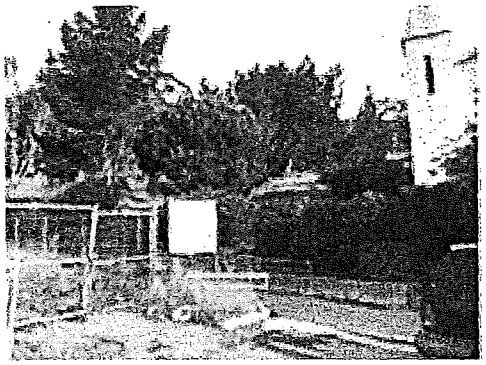
View to South from pathway below V V Middle School

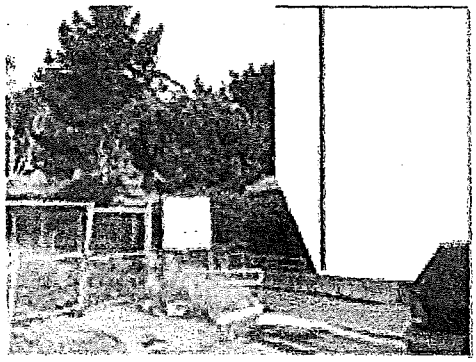


View to South of San Bruno Mountain and Valley from Raymond Avenue



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



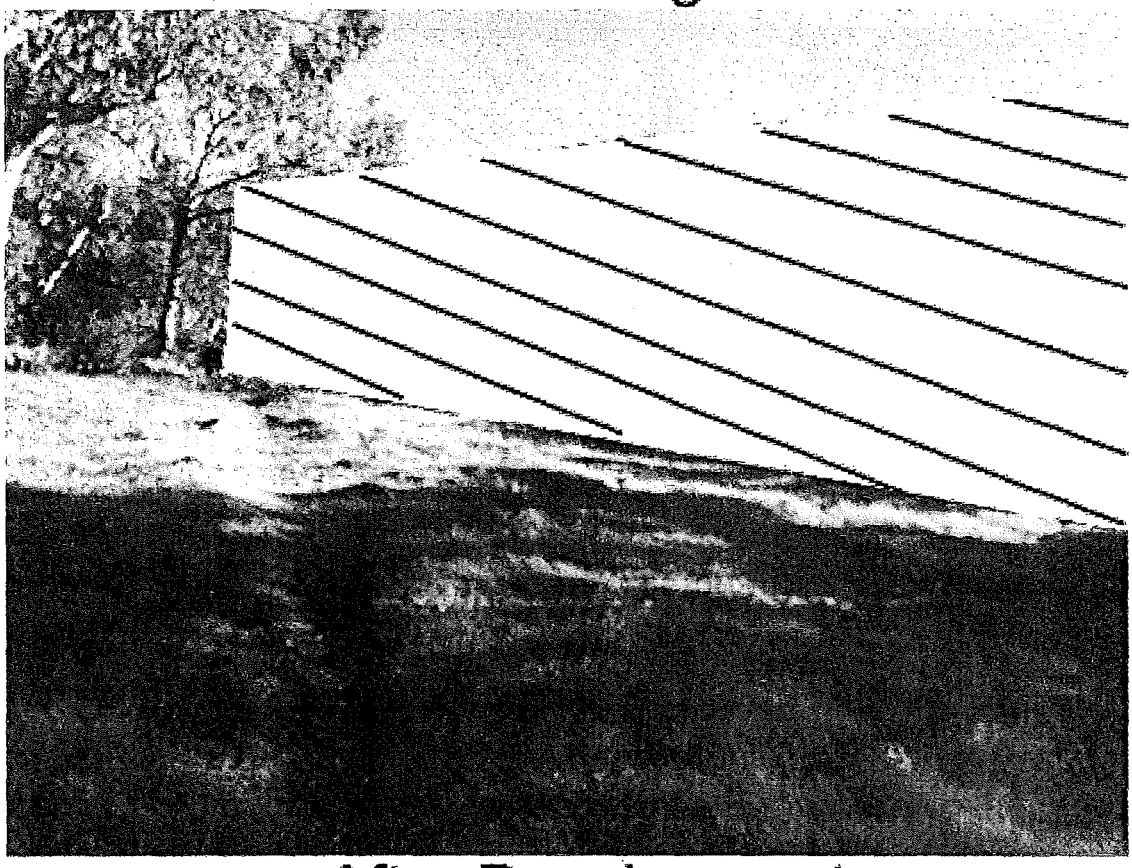


View from Lelandf Avenue looking North - Future renovated Community Garden, PUC Rain Garden and main entry to Mclaren Park in foreground

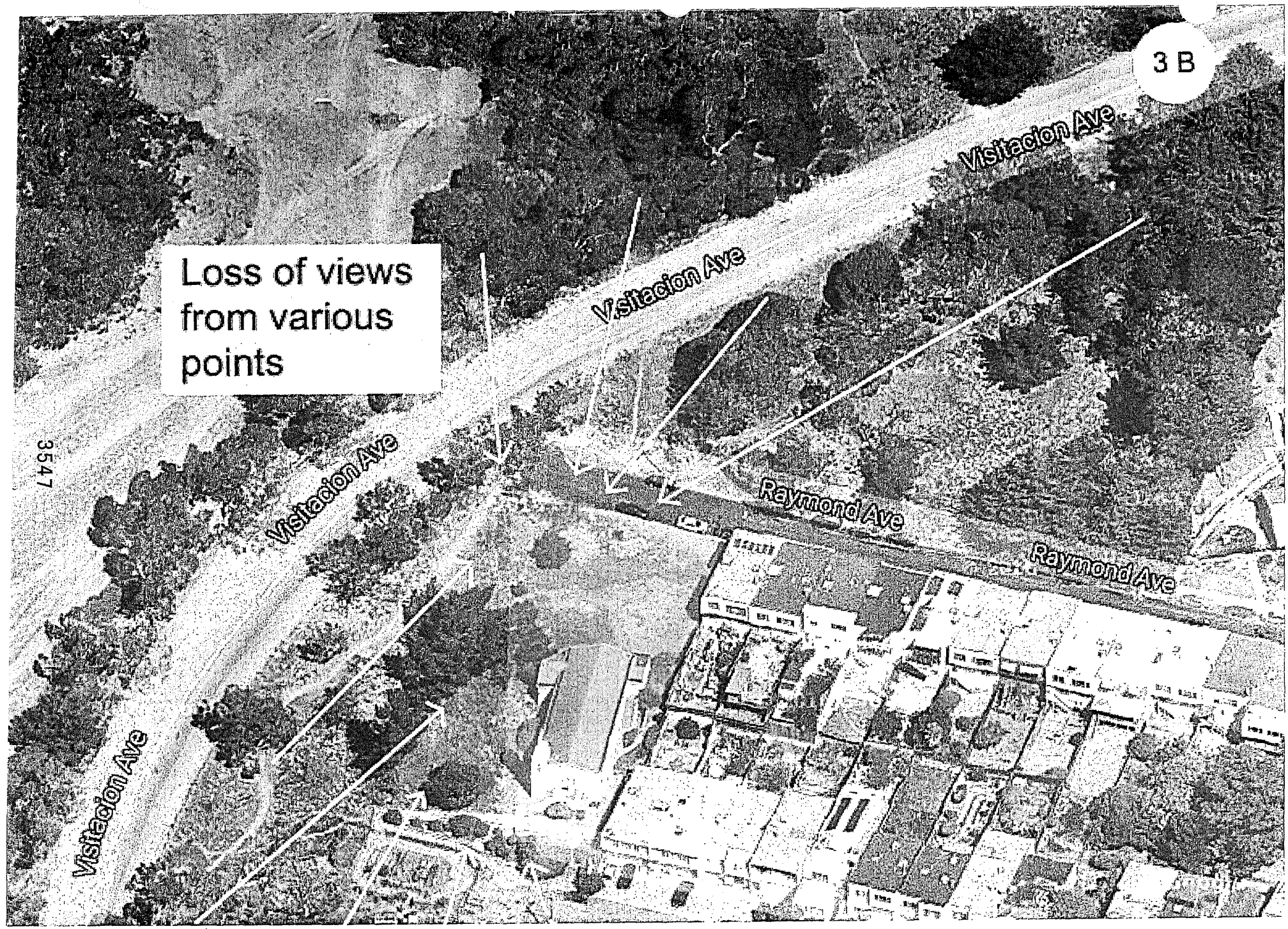
Loss of open space, views and trees from south

3 A

Existing



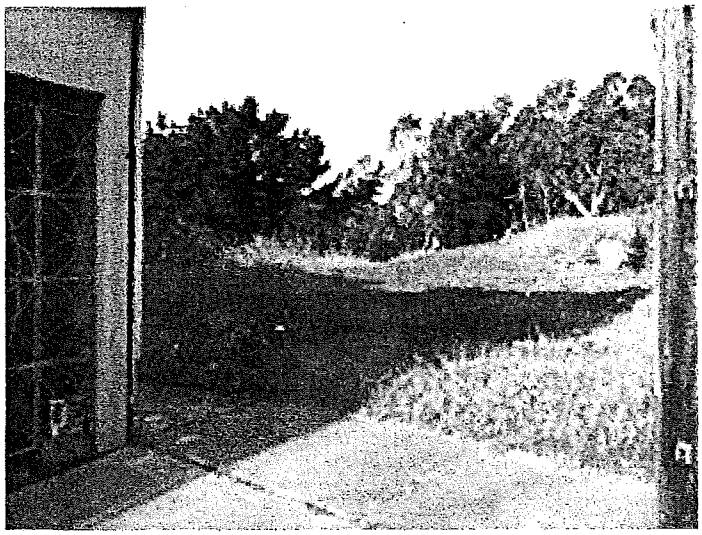
After Development

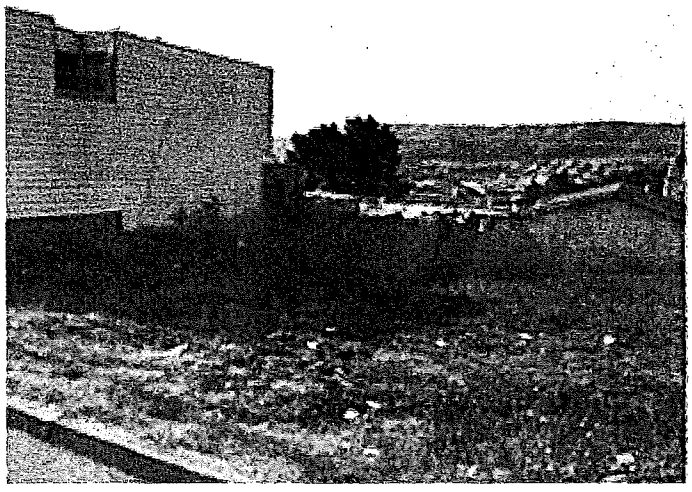

3 B
Loss of views from various points
Visitacion Ave
Visitacion Ave
Visitacion Ave
Visitacion Ave
Raymond Ave
Raymond Ave
3547

Impact of shadows

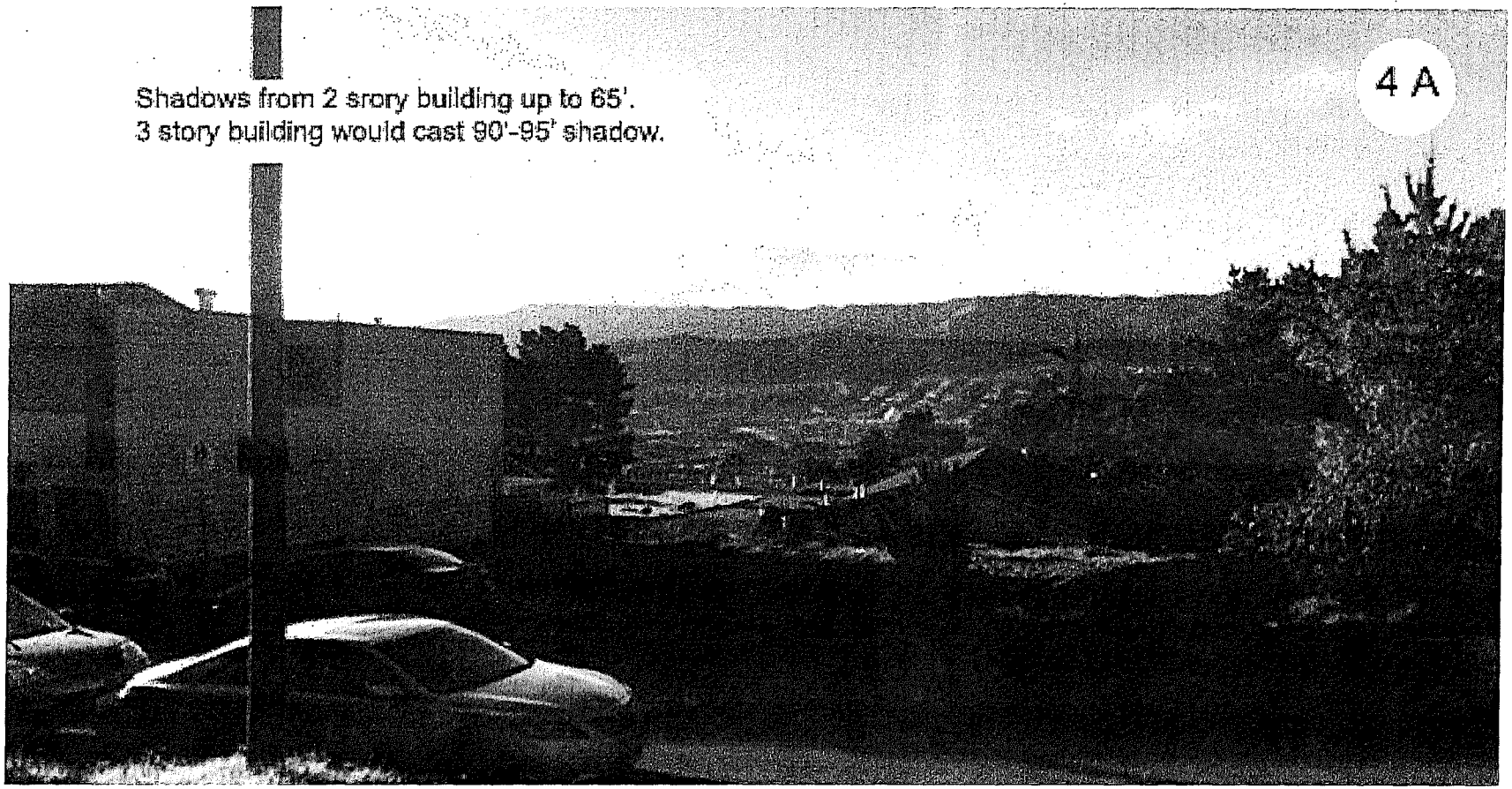
4

Red indicates shadows cast by development of up to 75 feet

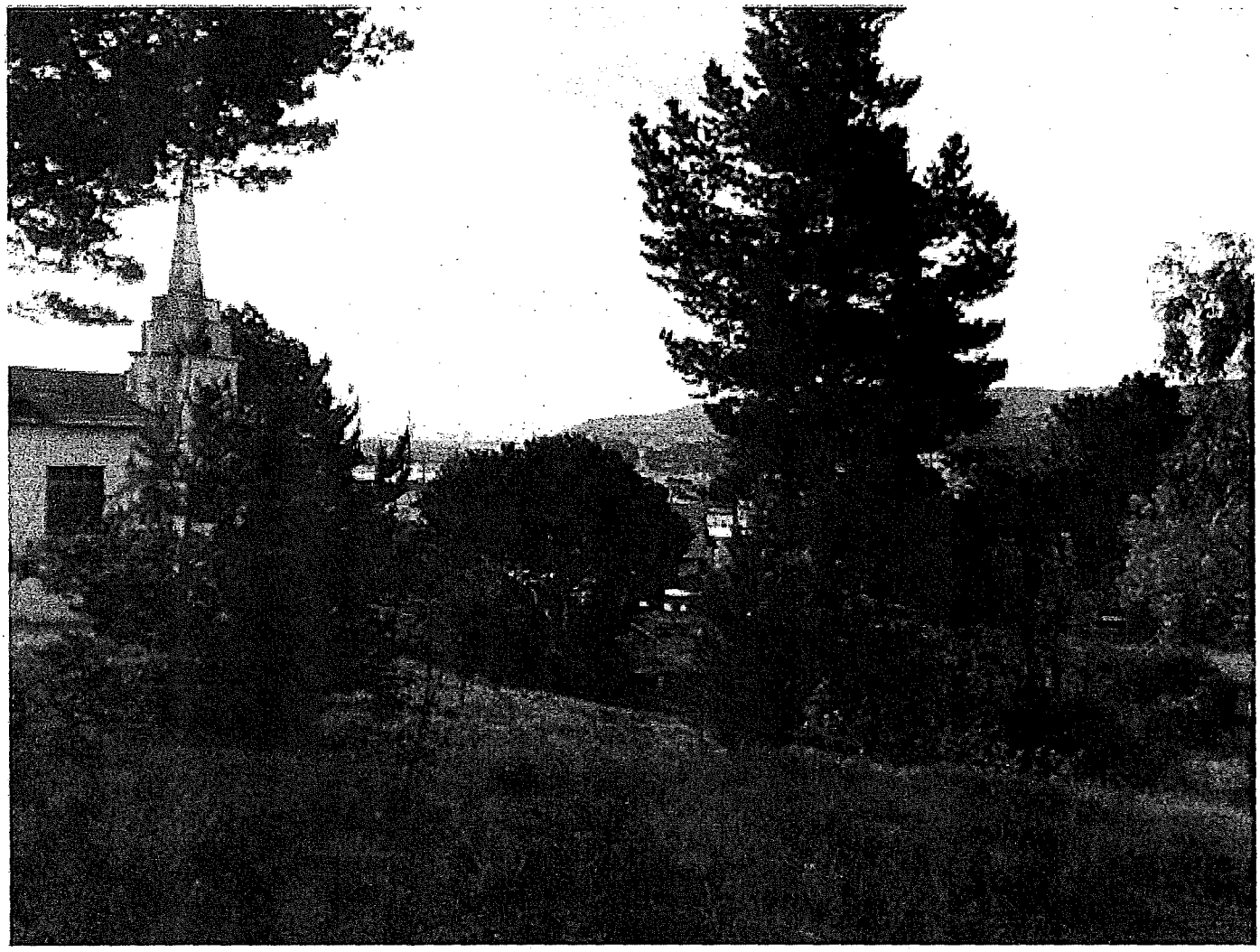


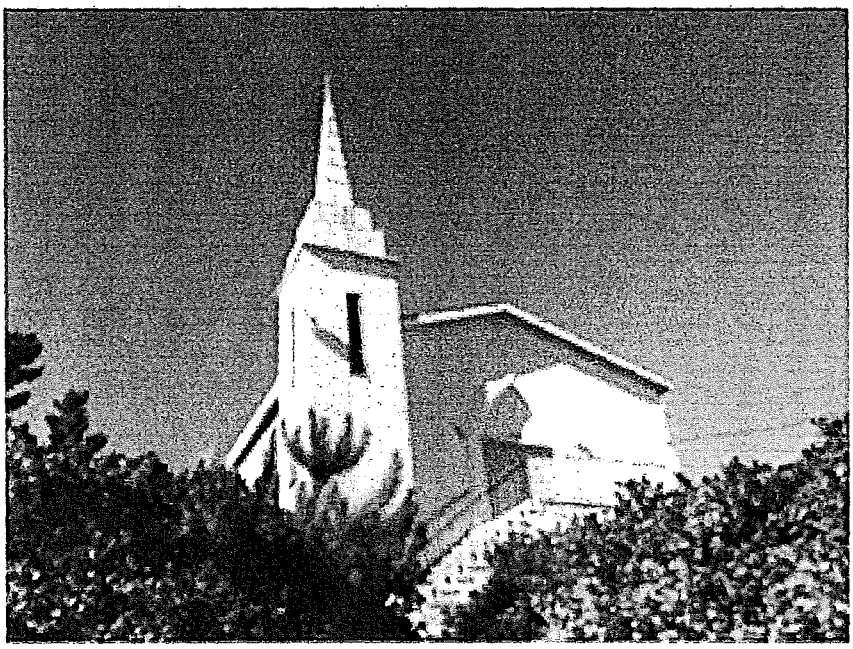


Existing conditions on Raymond Avenue : Shadws 50 feet long cast by 2 story building at 9 am

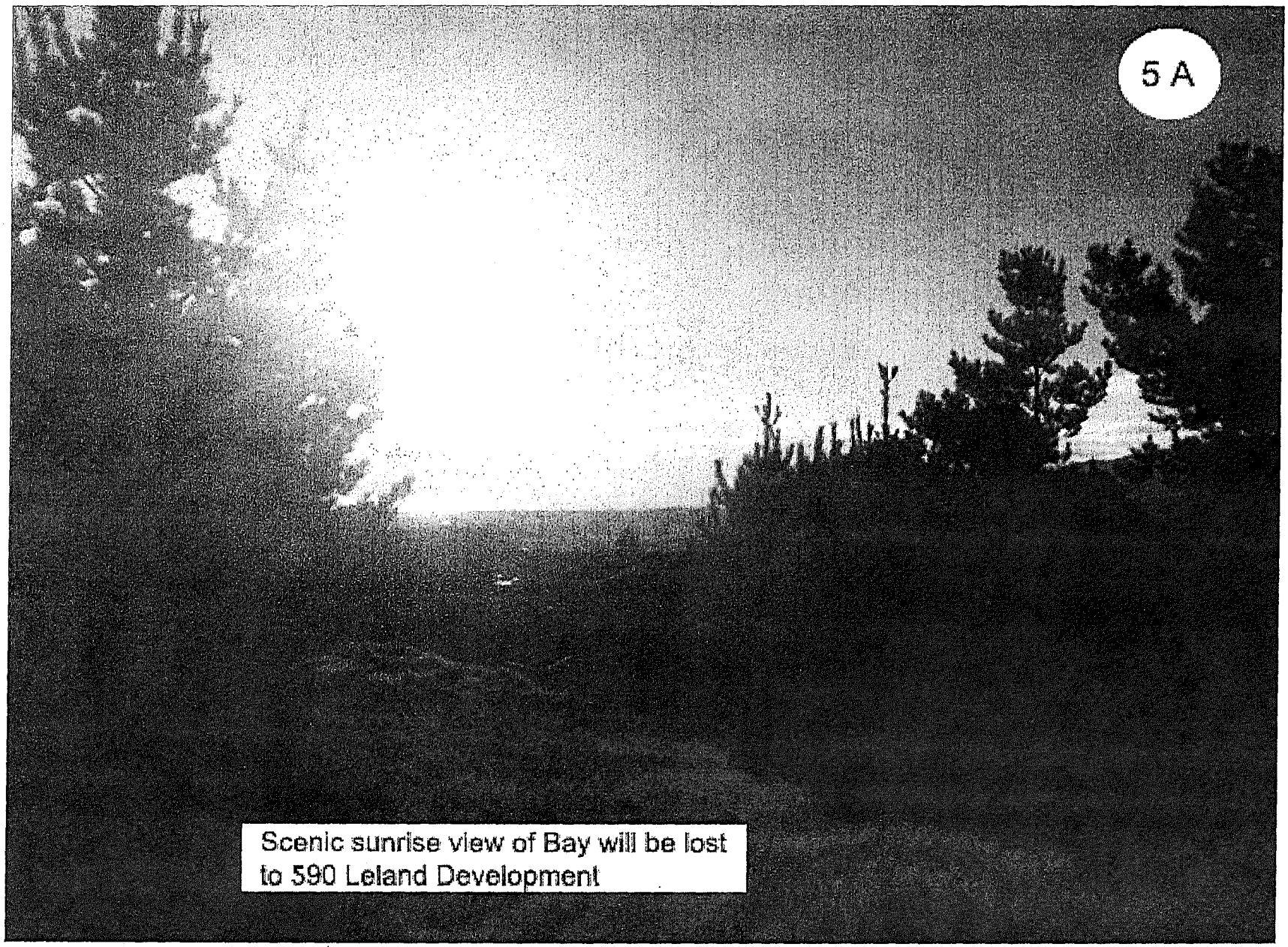

Shadows from 2 srory building up to 65'.
3 story building would cast 90'-95' shadow.
4 A

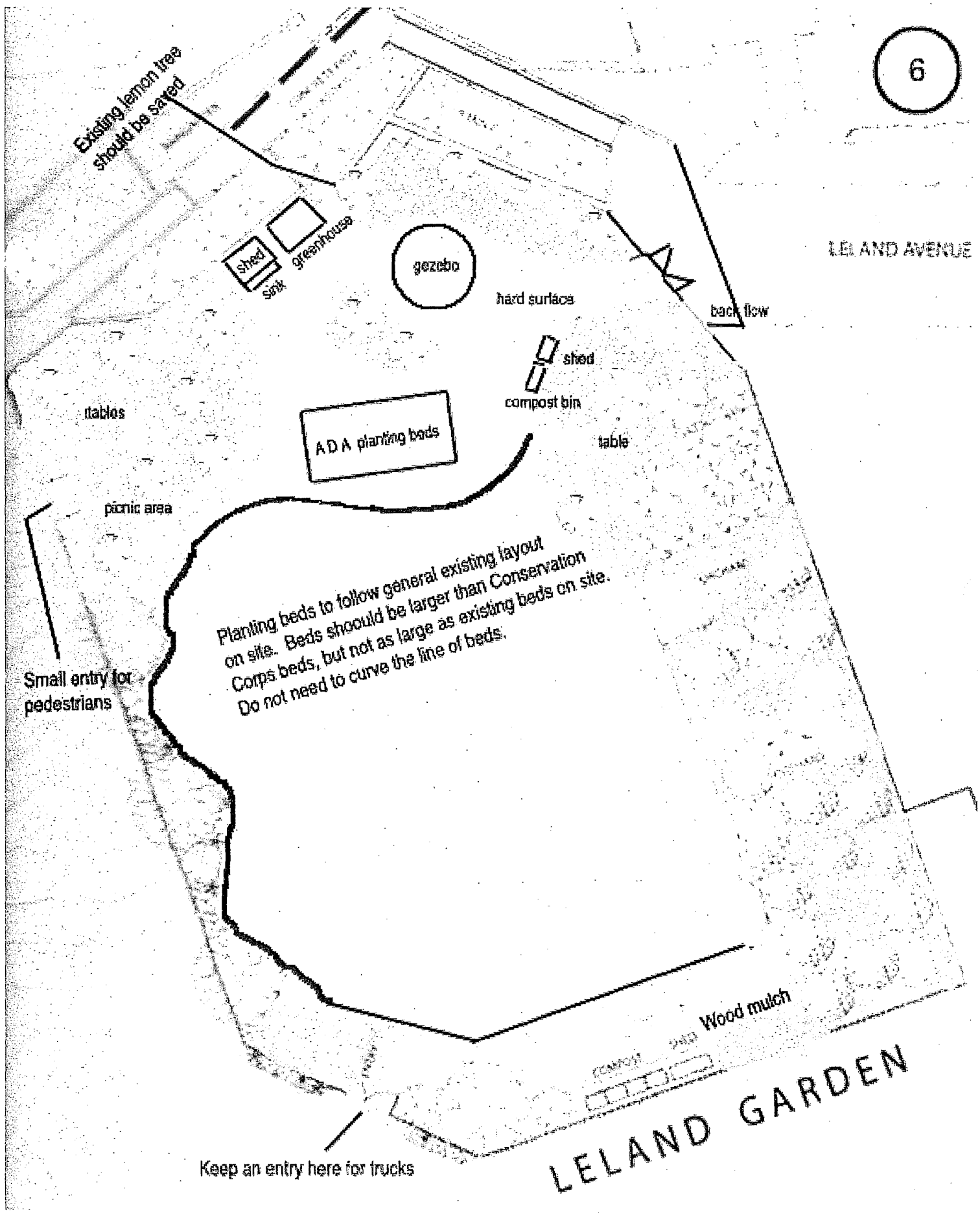
3549





Importance of Church to neighborhood aesthetics and character


5 A
Scenic sunrise view of Bay will be lost
to 590 Leland Development

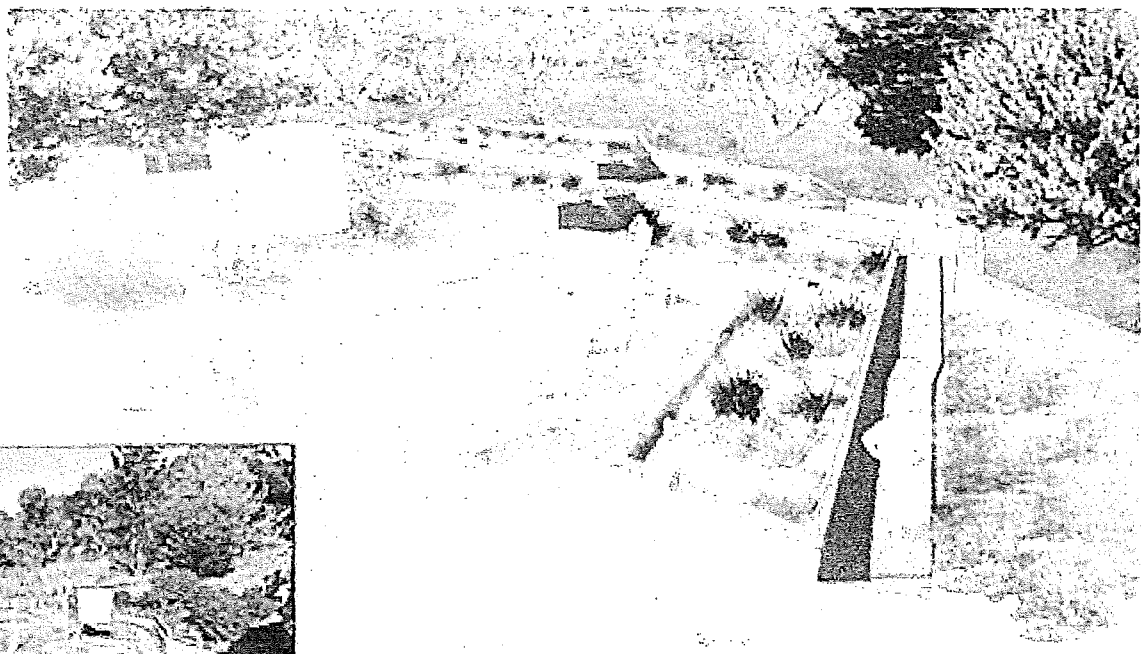

6
Existing lemon tree should be saved
shed
sink
greenhouse
gazebo
hard surface
back flow
LELAND AVENUE
shed
compost bin
tables
ADA planting beds
table
picnic area
Planting beds to follow general existing layout on site. Beds should be larger than Conservation Corps beds, but not as large as existing beds on site. Do not need to curve the line of beds.
Small entry for pedestrians
Wood mulch
LELAND GARDEN
Keep an entry here for trucks

7

San Francisco Water Power Sewer

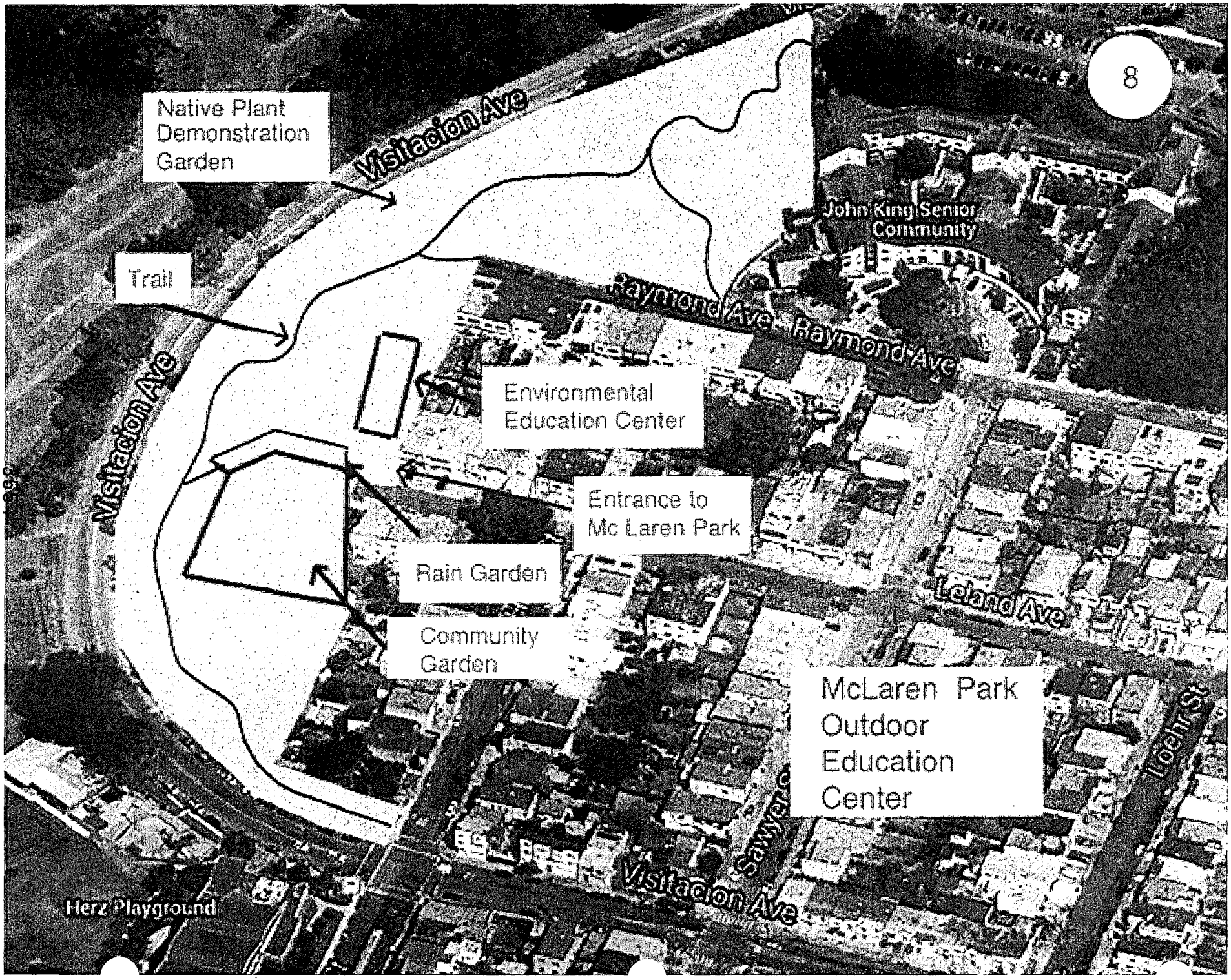
Leland Avenue Rain Garden

(At McLaren Park Community Garden)



Proposed Rain Garden Perspective

Existing Condition at end of Leland Ave


8
Native Plant Demonstration Garden
Visitacion Ave
John King Senior Community
Trail
Raymond Ave
Raymond Ave
Visitacion Ave
Environmental Education Center
Entrance to Mc Laren Park
Rain Garden
Community Garden
Leland Ave
McLaren Park Outdoor Education Center
Loehr St
Herz Playground
Visitacion Ave

Those who value the environment

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DATE Feb. 20, 2018 11-4288/1210

PAY TO THE ORDER OF SF Planning Dept $ 597.00

Five hundred ninety seven and No/100 DOLLARS

JAMES R GROWDEN
FRAN MARTIN
186 ARLETA AVE
SAN FRANCISCO CA 94134-2306

Fran Martin

Lew, Lisa (BOS)

From: BOS Legislation, (BOS)
Sent: Monday, March 26, 2018 12:02 PM
To: fma6764860@aol.com; vquan.sf@gmail.com
Cc: GIVNER, JON (CAT); STACY, KATE (CAT); JENSEN, KRISTEN (CAT); Rahaim, John (CPC); Gibson, Lisa (CPC); Sanchez, Scott (CPC); Sider, Dan (CPC); Starr, Aaron (CPC); Cooper, Rick (CPC); Pollak, Josh (CPC); Ionin, Jonas (CPC); Calvillo, Angela (BOS); Somera, Alisa (BOS); BOS-Supervisors; BOS-Legislative Aides; BOS Legislation, (BOS)
Subject: APPEAL RESPONSE: Appeal of CEQA Exemption Determination - 590 Leland Avenue - Appeal Hearing on April 3, 2018

Categories: 180179

Good morning,

Please find linked below an appeal response received by the Office of the Clerk of the Board from the Planning Department, regarding the Exemption Determination Appeal for the proposed project at 590 Leland Avenue.

Planning Appeal Response - March 26, 2018

The hearing for this matter is scheduled for a 3:00 p.m. special order before the Board on April 3, 2018.

Please note, on April 3, 2018, the Board is anticipated to entertain a motion to continue this appeal hearing to April 10, 2018.

I invite you to review the entire matter on our Legislative Research Center by following the link below:

Board of Supervisors File No. 180179

Regards,

Brent Jalipa
Legislative Clerk
Board of Supervisors - Clerk's Office
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-7712 | Fax: (415) 554-5163
brent.jalipa@sfgov.org | www.sfbos.org

Click here to complete a Board of Supervisors Customer Service Satisfaction form

SAN FRANCISCO
PLANNING DEPARTMENT

MEMO

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Categorical Exemption Appeal

590 Leland Avenue

DATE: March 26, 2018
TO: Angela Calvillo, Clerk of the Board of Supervisors
FROM: Lisa Gibson, Environmental Review Officer – (415) 575-9032
Josh Pollak – (415) 575-8766
RE: Planning Case No. 2014.0936E
Appeal of Categorical Exemption for 590 Leland Avenue
HEARING DATE: 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

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 ½"-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.[1] 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.

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 analysis[2]; 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 project[3] 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.

---

[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

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 biologists[4] 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

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

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.[6] Therefore, the effect on visual resources

[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.

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

[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

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

[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.

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 Roster[10] 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

[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.

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

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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:

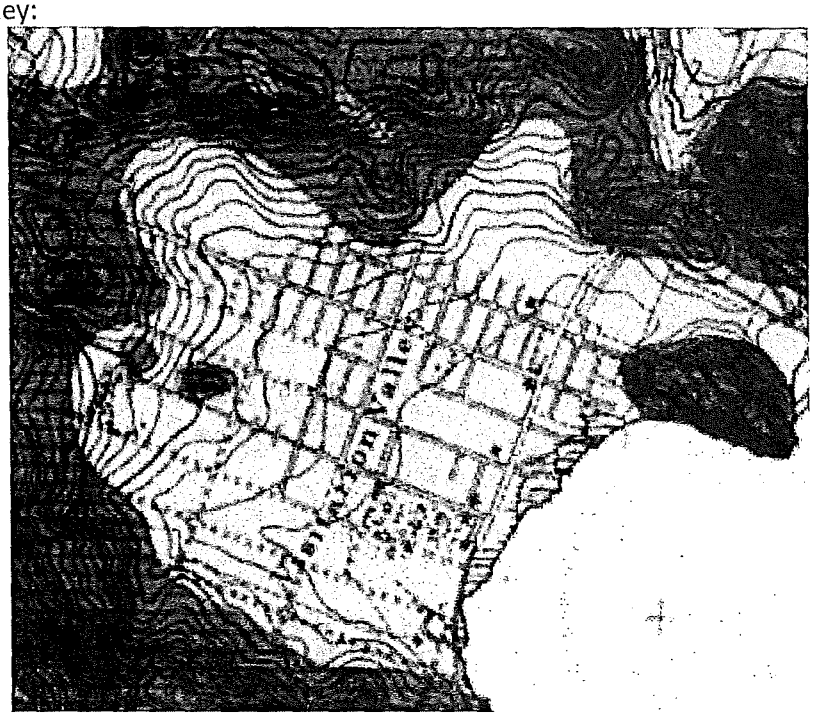
I am writing to alert you to a recent discovery of biological significance at and near 590 Leland Avenue in Visitacion Valley near McLaren Park. The discovery pertains to at least two significant plant species that are indicators of remnant coastal dune habitat that were not reported to exist before 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

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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.[1] 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.

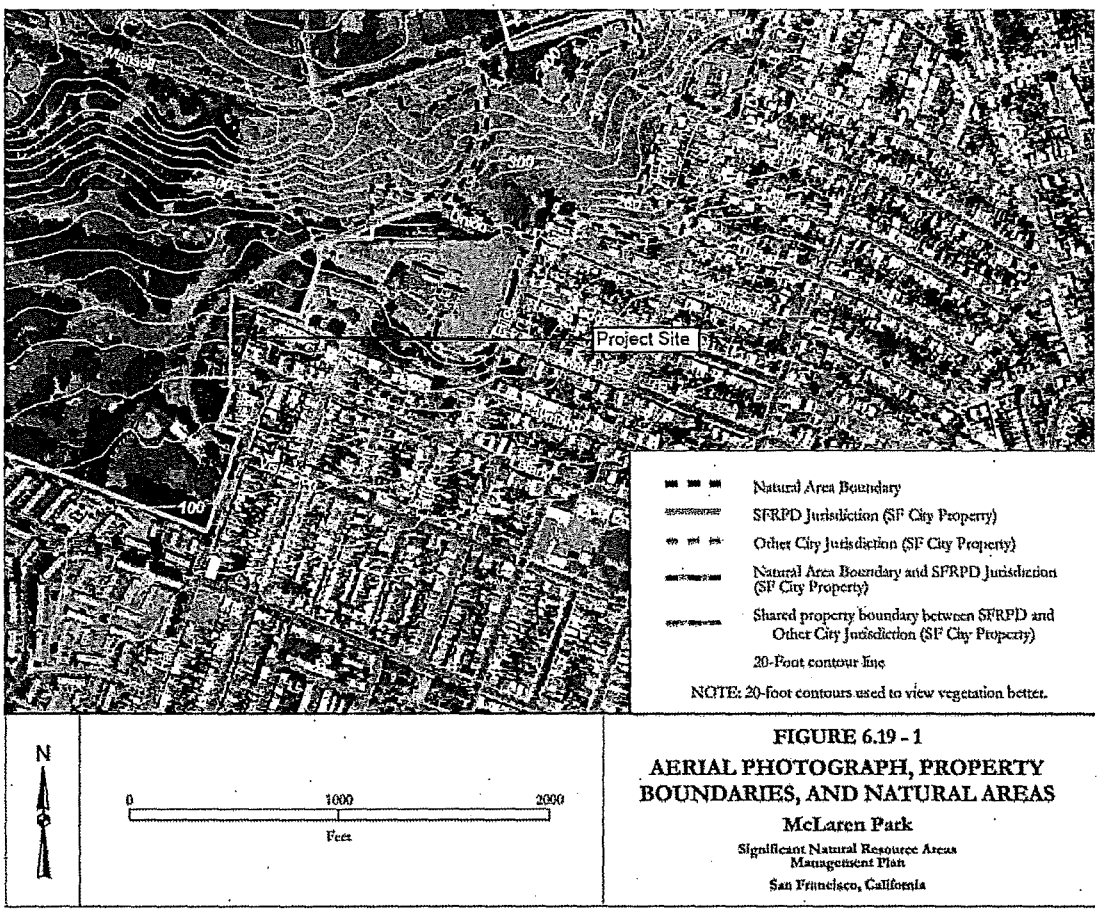

Figure 1: Project location in relation to McLaren Park (as shown within the San Francisco Significant Natural Areas Management Plan [SFRPD, 2006])

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).

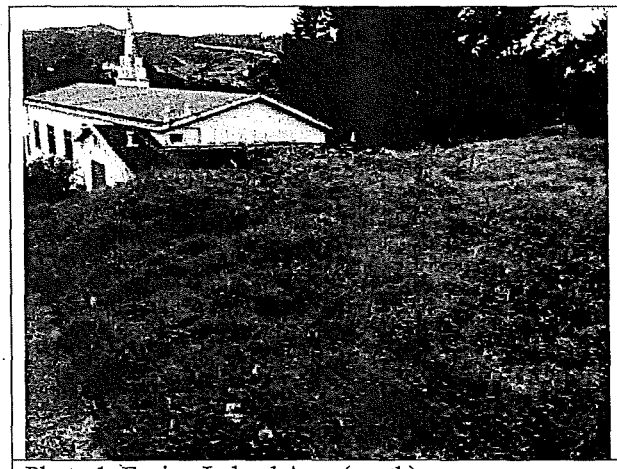

Photo 1: Facing Leland Ave. (south)

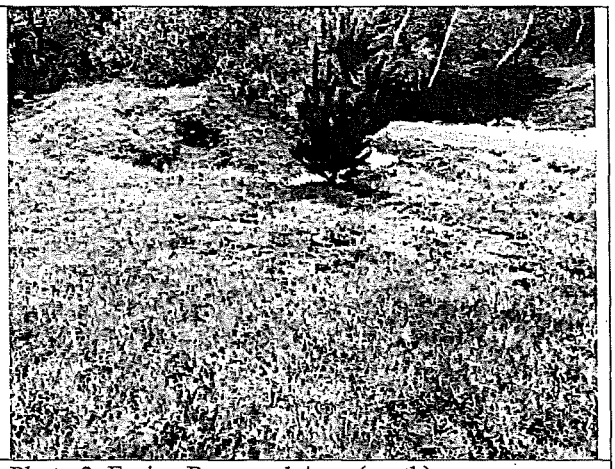

Photo 2: Facing Raymond Ave. (north)

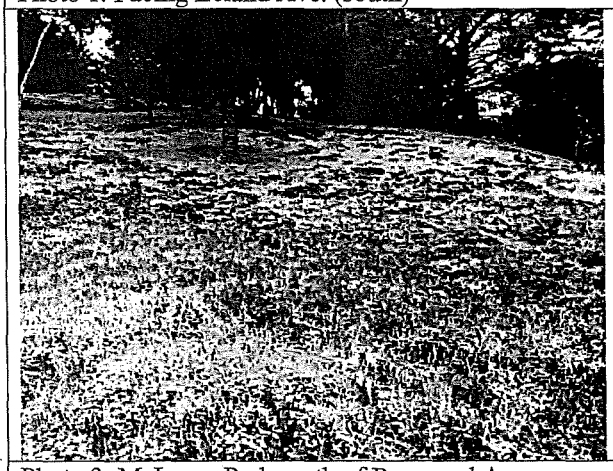

Photo 3: McLaren Park north of Raymond Ave.

Photo 4: Detail of Photo 3

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) protocol[2] 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

Calflora, 2017. [http://www.calflora.org/] Accessed January 11, 2017.

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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.

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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-level[1] 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 memorandum[2] 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 2017[4], 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.

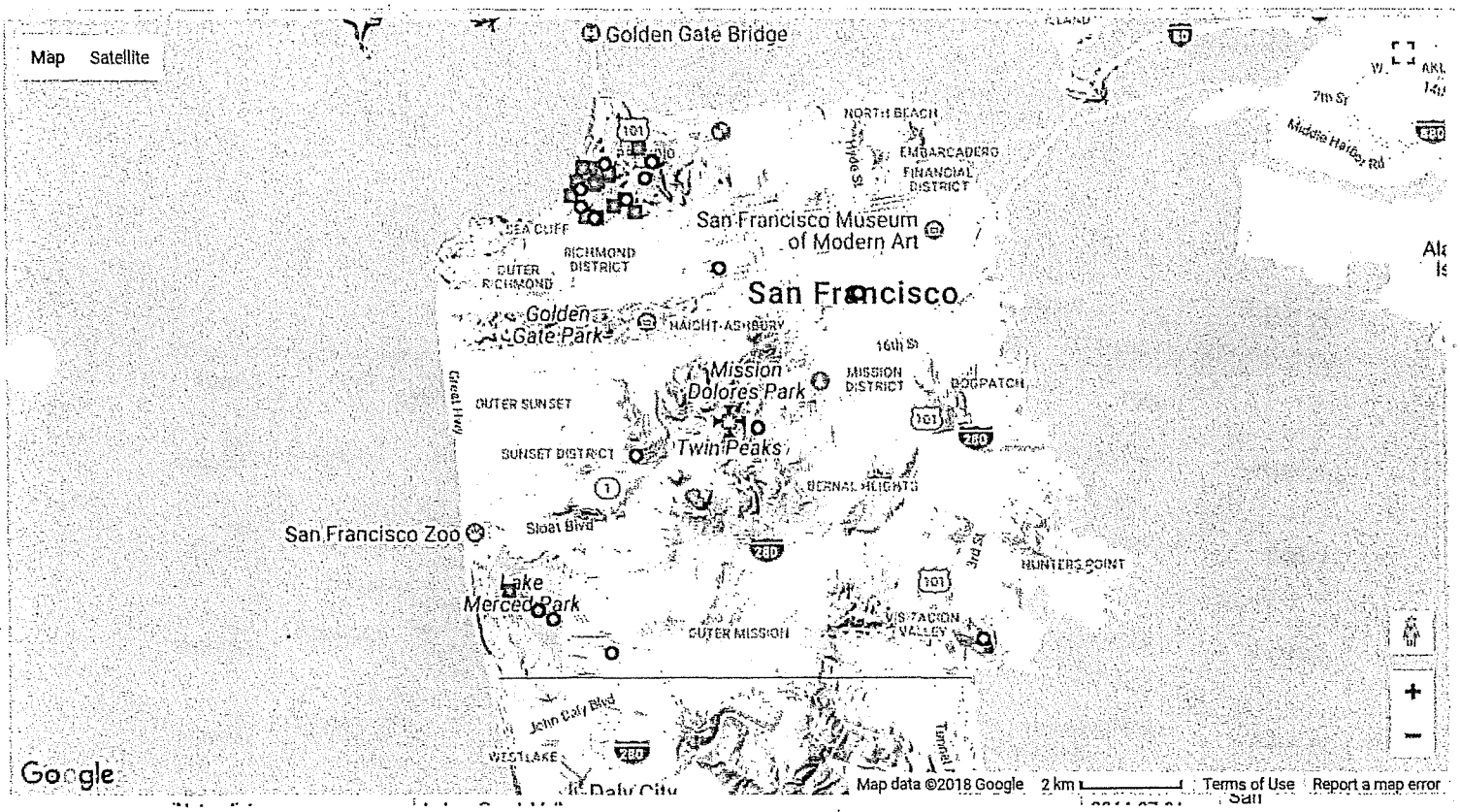
Scientific Name	**Common Name**
Aloe vera	aloe vera
Arum sp.	arum lily
Avena barbata	slender oat
Bromus diandrus	ripgut brome
Briza maxima	rattlesnake grass
Canna sp.	canna lily
Carpobrotus edulis	Iceplant
Conium maculatum	poison hemlock
Cortaderia jubata	pampas grass
Cotoneaster spp.	Cotoneaster
Cynodon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


Map
Satellite
Golden Gate Bridge
NORTH BEACH
EMBARCADERO
FINANCIAL DISTRICT
San Francisco Museum of Modern Art
SEA CLIFF
RICHMOND DISTRICT
OUTER RICHMOND
San Francisco
Golden Gate Park
HAIGHT-ASHBURY
16th St
Mission Dolores Park
MISSION DISTRICT
DOGPATCH
OUTER SUNSET
Twin Peaks
SUNSET DISTRICT
BERNAL HEIGHTS
San Francisco Zoo
Sloat Blvd
3rd St
HUNTERS POINT
Lake Merced Park
OUTER MISSION
VISITACION VALLEY
John Daly Blvd
WESTLAKE
Daly City
Middle Harbor Rd
Google
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37.7525, -122.4478

Scientific Name
Croton californicus

anywhere
in map area

Status (native or not)
any

Common Name

Plant List

▶ POLYGON

Start Date End Date Observer

Photos
any

include surveys/checklists

▶ OTHER SOURCES

CCH, iNaturalist

County
any
Alameda
Alpine
Amador
Butte
Calaveras
Contra Costa
Colusa
Del Norte

Columns
Basic Data

▶ customize

Order by
Observation Date

SEARCH

Click on ID to select a record. 56 records:

ID	Plant	Photo	Observer	Source	Location Description	Date	County
in:1692295	Croton californicus Desert croton	none	Michael Chassé	iNaturalist	Lobos Creek Valley	2015-06-25	San Francisco
in:849526	Croton californicus Desert croton	none	Michael Chassé	iNaturalist	Lobos Creek Valley	2014-07-31	San Francisco
in:658832	Croton californicus Desert croton	none	rzebell	iNaturalist	Hawk Hill Park, San Francisco, CA, US	2014-05-04	San Francisco
in:587612	Croton californicus Desert croton	none	shasek	iNaturalist		2014-03-28	San Francisco
GG388	Croton californicus Desert croton checklist	none	Marie Fontaine	Presidio Natural Resources	Baker Beach	2002-05-21	San Francisco
GG209	Croton californicus Desert croton checklist	none	Jen Adler; Andrew Baker	Presidio Natural Resources	Lobos Creek Valley; Remnant Dunes	2002-05-20	San Francisco
GG401	Croton californicus Desert croton checklist	none	Marie Fontaine	Presidio Natural Resources	Golf Course West	2001-08-29	San Francisco
GG499	Croton californicus Desert croton checklist	none	Michael Chasse	Presidio Natural Resources	Rob Hill; Lessingia Site	1997-05-07	San. Francisco
GG184	Croton californicus Desert croton	none			Golf Course West	1994-08-20	San Francisco

Calflora Observation Hotline ▶TOOLS ▶Map ▶MAP LAYERS LO REGIS

GG314	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
GG116	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
GG672	Croton californicus Desert croton checklist	none	Sharon Farrell; Wende Reulaender	Presidio Natural Resources	Central Magazine	1994-06-14	San Francisco
ce231	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
GG547	Croton californicus Desert croton checklist	none	Mike Vasey; Isabelle DeGeoffrey	Presidio Natural Resources	Lobos Creek Valley; New Dunes	1994-01-01	San Francisco
GG614	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
GG606	Croton californicus Desert croton checklist	none	Peter Raven	Presidio Natural Resources	Lobos Creek Valley	1954-08-22	San Francisco
GG4	Croton californicus Desert croton checklist	none	Albert Kellogg; W. G. Hardford	Presidio Natural Resources	Lobos Creek Valley	1958-01-01	San Francisco
GG440	Croton californicus Desert croton checklist	none	Michael Chasse; Laura Chantri; Ricky Medrano	Presidio Natural Resources	Baker Beach; Battery Chamberlin	2009-04-16	San Francisco
GG438	Croton californicus Desert croton checklist	none	Michael Chasse; Laura Chantri; Ricky Medrano	Presidio Natural Resources	Southwest Dunes; Silene Area	2009-04-16	San Francisco
GG67	Croton californicus Desert croton checklist	none	Brett Stevenson; Andy Kleinhesselink	Presidio Natural Resources	Southwest Dunes; Wherry Dunes	2008-07-18	San Francisco
GG689	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	Croton californicus Desert croton checklist	none ▶ TOOLS	Marie Fontaine; Emily Magnaghi	Presidio Natural Resources	Rob Hill; Lessingia Site ▶ Map	2002-06-12 ▶ MAP LAYERS	San Francisco REGIS
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
cch:**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
cch:**RSA51364**	Croton californicus Desert croton	none	L. S. Rose	Consortium of California Herbaria	Lake Merced	1949-09-07	San Francisco
cch:**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 Desert croton	none ▸ TOOLS	Lewis S. Rose	Consortium of California Herbaria	Lake Merced San Francisco (type locality) ▸ MAP LAYERS	1949-09-07	San Francisco REGIS
cch: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
cch:RSA149688	Croton californicus Desert croton	none	George W. Barclay	Consortium of California Herbaria	San Francisco.	1837-11-01	San Francisco
cch:POM87055	Croton californicus Desert croton	none	Marcus E. Jones	Consortium of California Herbaria	San Francisco	1881-07-15	San Francisco
cch:SEINET7113634	Croton californicus Desert croton	none	Marcus E. Jones	Consortium of California Herbaria	San Francisco	1881-01-01	San Francisco
cch:SEINET5788881	Croton californicus Desert croton	none	Marcus E. Jones	Consortium of California Herbaria	San Francisco	1881-01-01	San Francisco
cch:UC17563	Croton californicus Desert croton	none	H. N. Bolander	Consortium of California Herbaria	San Francisco	1863-12-31	San Francisco
cch: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
cch:UC334106	Croton californicus Desert croton	none	Kellogg and Harford	Consortium of California Herbaria	Lone Mtn. S. Francisco	1877-05-31	San Francisco
cch: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
cch:SBBG33910	Croton californicus Desert croton	none	L. S. Rose	Consortium of	San Francisco, Presidio,	1969-09-11	San Francisco

Calflora Observation Hotline		TOOLS		California Herbaria	above golf MAPS	MAP LAYERS	LOG REGIS
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, State, CNPS, Local	Local Significance
Fish			
Eucyclogobius newberryi	Tidewater Goby	FPD (FE), CSC	Historically collected (1895), not recently observed in the City
Reptiles and Amphibians			
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)

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
Linaria canadensis	Canadian or Blue Toad-Flax	LS	Presently occurs at Hawk Hill
Lithophragma heterophylla	Prarie Star, Woodland Star	LS	Presently occurs in Bayview Park
Marah oreganus	Wild Cucumber, Man-root	LS	Presently occurs at McLaren Park and Lake Merced
Monardella undulata	Curly-leaved Monardella	CNPS List 4	Not known to occur in the City
Muilla maritima	Common Muilla	LS	Presently occurs at Corona Heights, Tank Hill, Bernal Hill and Mount Davidson
Navarretia squarrosa	Skunkweed	LS	Presently occurs at Hawk Hill and McLaren Park
Osmorhiza chilensis	Sweet Cicely	LS	Presently occurs at Interior Greenbelt.
Pellaea andromedifolia	Coffee Fern	LS	Historically reported not recently observed in the City.
Prunus emarginata	Bitter Cherry	LS	Presently occurs at Bayview and Glen Canyon
Prunus ilicifolia	Holly-leaved Cherry Islais Cherry	LS	Presently occurs at Bayview Park, Glen Canyon
Prunus virginiana var. demissa	Western Choke Cherry	LS	Presently occurs at Tank Hill and Bayview Park
Quercus chrysolepis	Canyon Live Oak	LS	Presently occurs at Lake Merced
Rhamnus crocea	Spiny Redberry	LS	Presently occurs at Glen Canyon
Ribes divaricatum	Coastal Black Gooseberry	LS	Presently occurs at Lake Merced
Ribes menziessi	Canyon Gooseberry	LS	Presently occurs at Bayview Park
Rosa gymnocarpa	Wood Rose	LS	Presently occurs at Bayview Park, O'Shaughnessy and Mount Davidson
Rubus parviflorus	Thimbleberry	LS	Presently occurs at Lake Merced and Interior Green Belt
Salvia spathacea	Hummingbird Sage	LS	Presently occurs at Bernal Hill.
Saxifraga californica	California saxifrage	LS	Presently occurs at Billy Goat Hill
Sedum spathulifolium	Broadleaf Stonecrop	-	Larval food plant for San Bruno elfin butterfly, presently occurs at Glen Canyon, Mt. Davidson, O'Shaughnessy Hollow, Tank Hill, and Twin Peaks
Senecio aronicoides	Groundsel	LS	Presently occurs at Bayview Park and Mount Davidson
Silene scouleri ssp. *grandis*	Scouler's Large Campion	LS	Presently occurs at Bayview Hill
Silene verecunda ssp. *verecunda*	San Francisco Campion	FSC, CNPS List 1B	Presently occurs at Mt. Davidson and Rock Outcrop
Sisyrinchium californicum	Yellow-eyed Grass	LS	Only San Francisco population in Glen Canyon
Tanacetum camphoratum	Dune Tansy	-	Southern distributional limit. Presently occurs at Grandview Park, Golden Gate Heights, Hawk Hill, Rock Outcrop, Lake Merced, and Balboa Natural Area.
Triphysaria eriantha var. *rosea*	Johnny-tuck	LS	Presently 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.

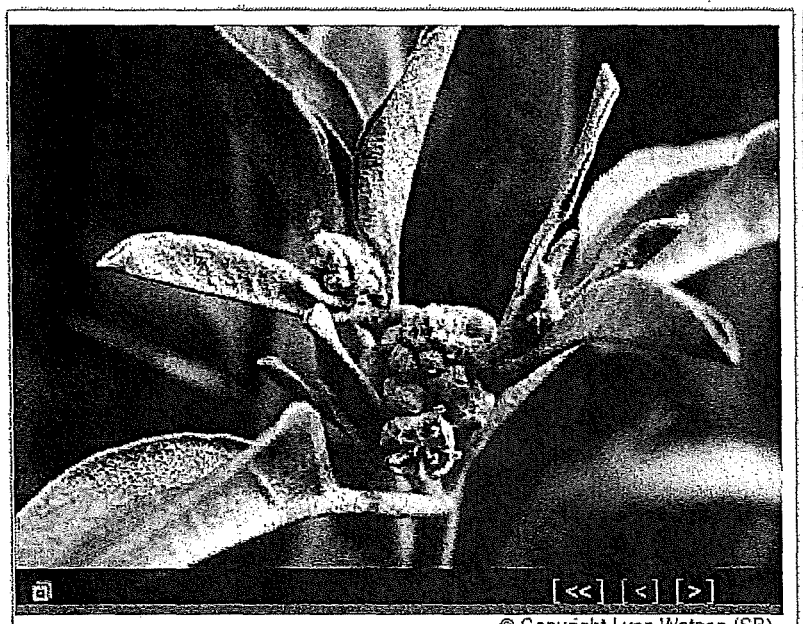
Golden Gate Audubon Society

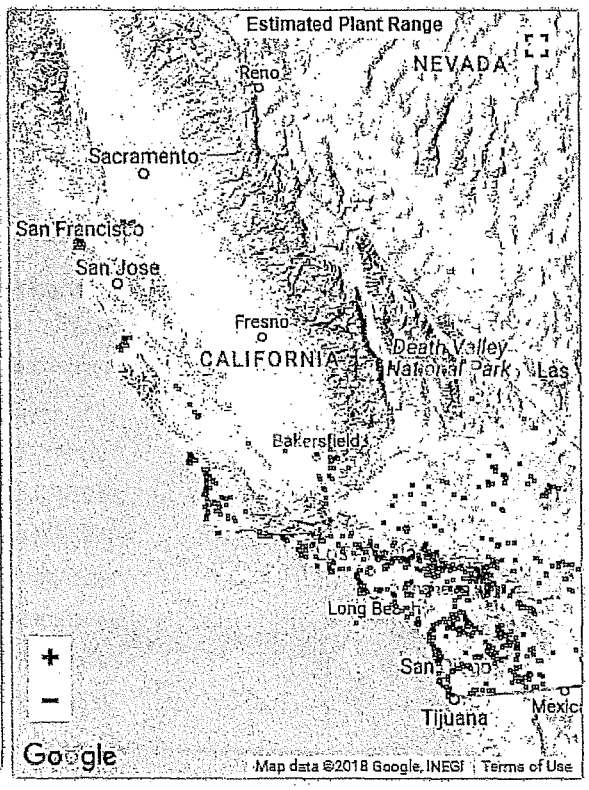
SLC Species of Local Concern

California Croton

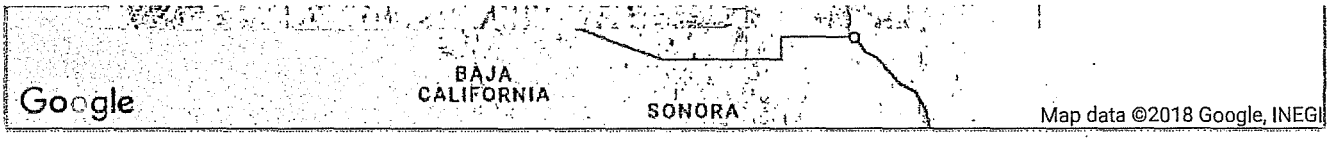
Add to My Plant List

Croton californicus





About Calscape Maps Detailed Map >



About Calscape Maps **Detailed Map >**

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 Type	Perennial herb
Max. Height	3.3 ft (1 m)
Flower Color	Green
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

Restore Nature One Garden at a Time with Calscape

Dedicated to the Preservation of California Native Flora

California Native Plant Society 2707 K Street, Suite 1 • Sacramento, CA 95816-5113
(916) 447-2677 • fax (916) 447-2727 • cnps@cnps.org

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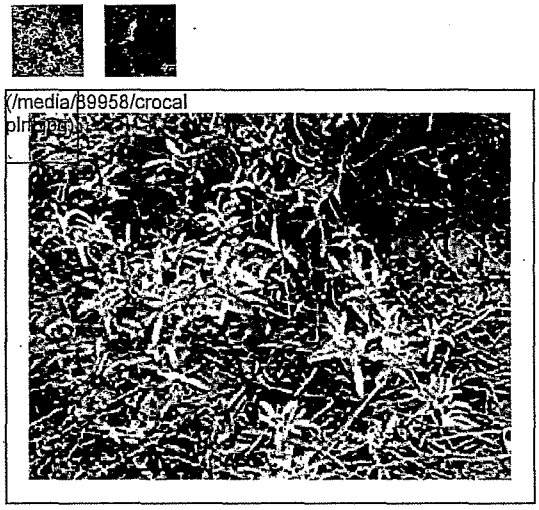
CROTON CALIFORNICUS

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.

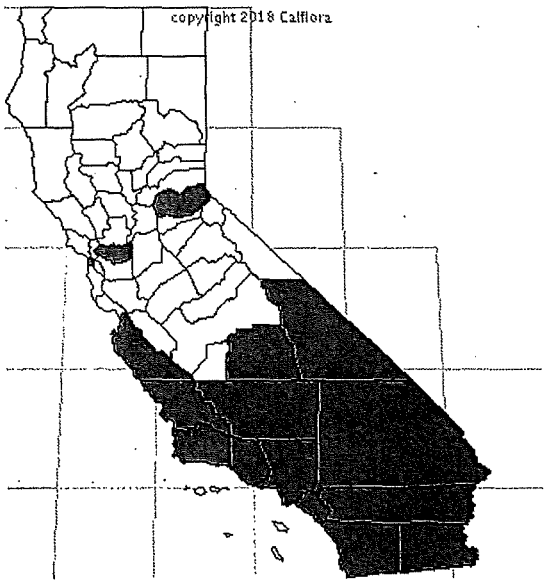
US Distribution:	beyond CA but confined to w. North America
Plant Community(s):	Coastal Sage Scrub, Coastal Strand, Chaparral, Creosote Bush Scrub
Habitat:	coastal
Family:	Euphorbiaceae

NAME STATUS:

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 California.

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")

Croton californicus

California Croton

Plant family: Euphorbiaceae - Spurge

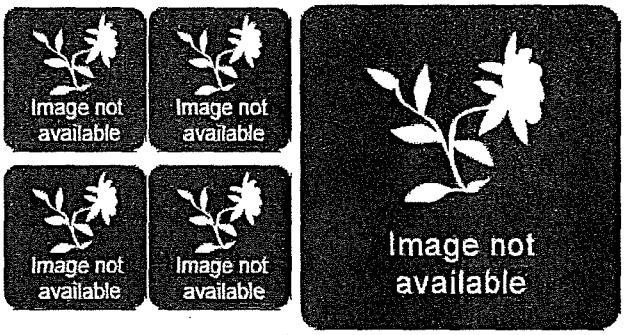
Plant type: Shrub

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 Go



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

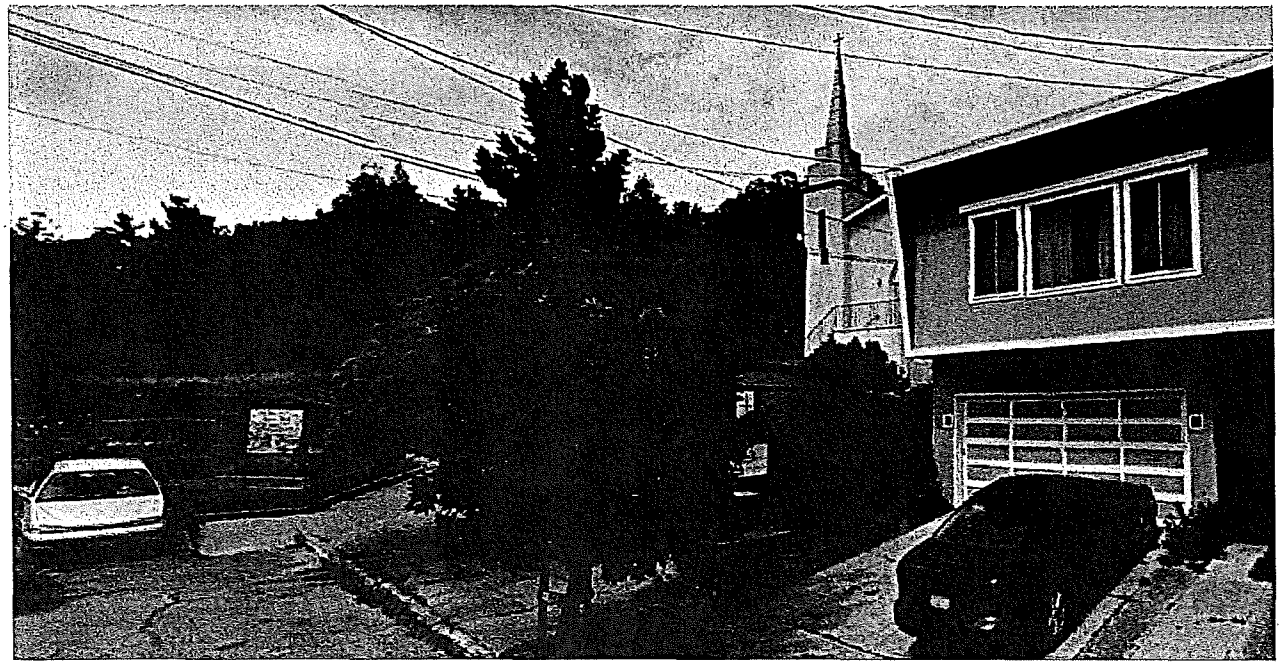
- Excerpt from January 18, 2018 Discretionary Review hearing packet

Aerial Photographs

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

SAN FRANCISCO
PLANNING DEPARTMENT

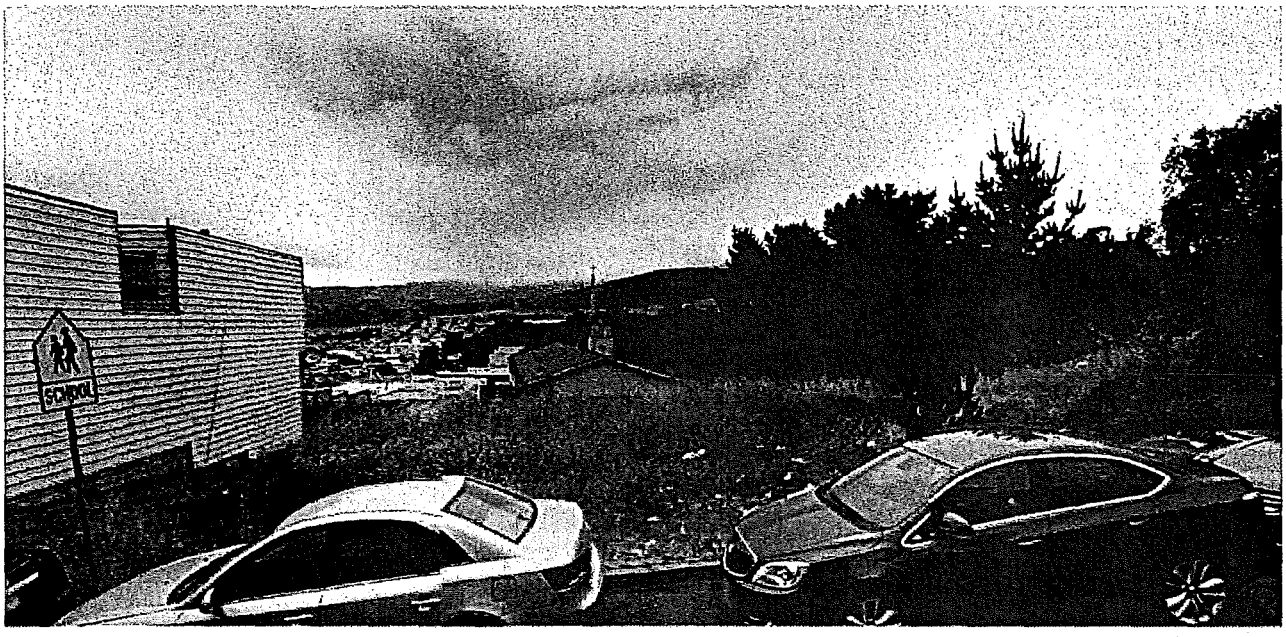
Leland Avenue Site Photographs



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

SAN FRANCISCO
PLANNING DEPARTMENT

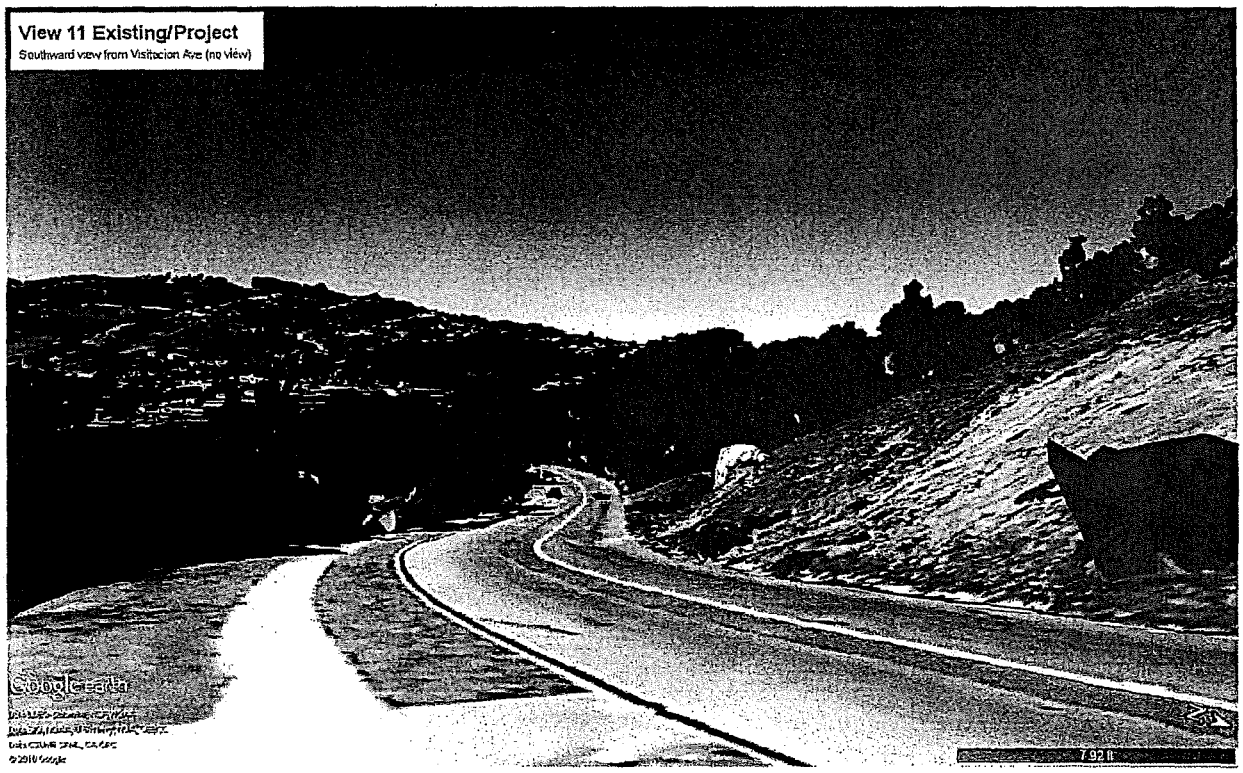
Raymond Avenue Site Photographs

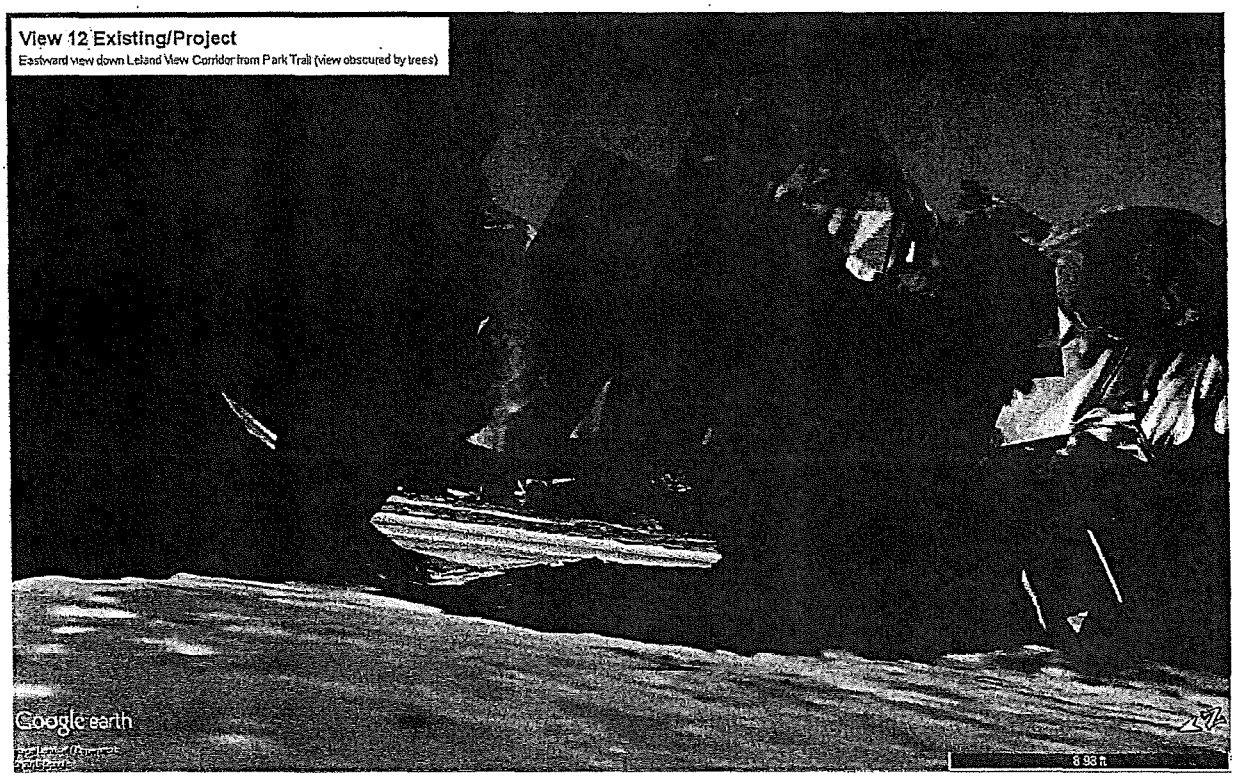


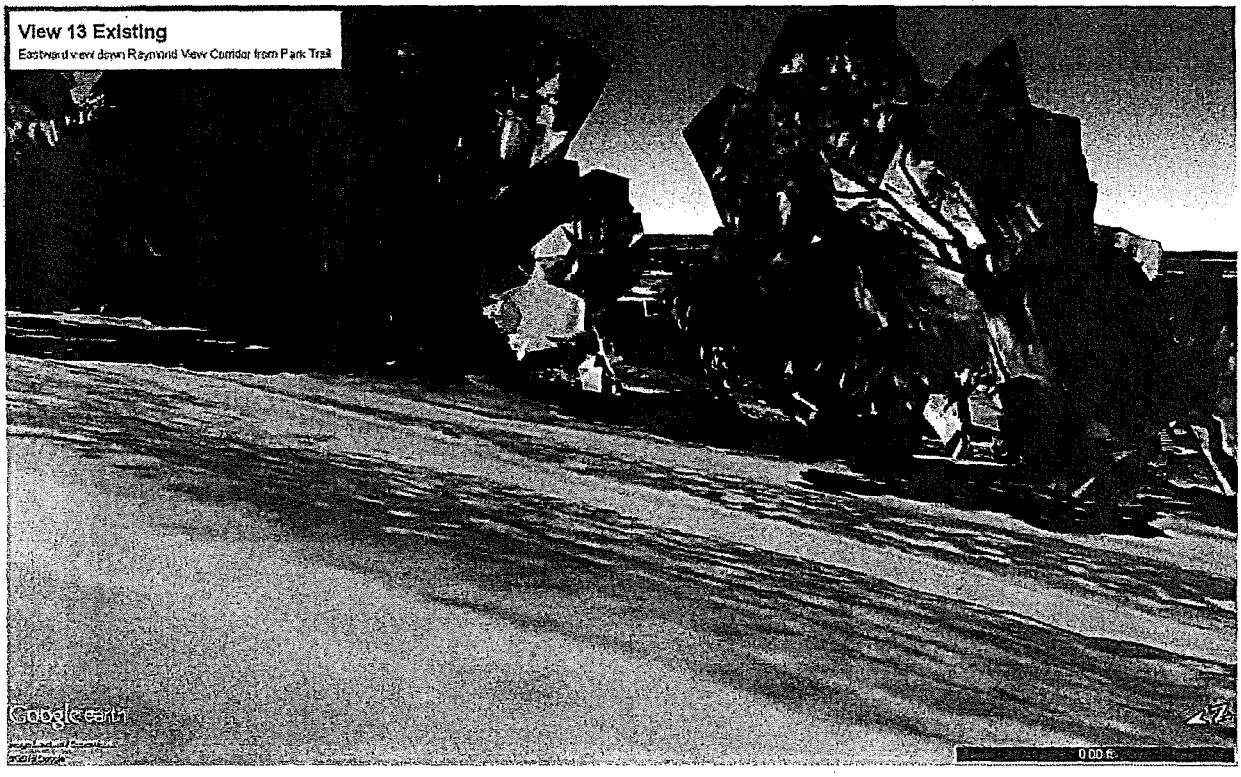
Discretionary Review Hearing
Case Number 2014.0936DRP
590 Leland Avenue
6243/019; 061, 062, 063, 064 and 065

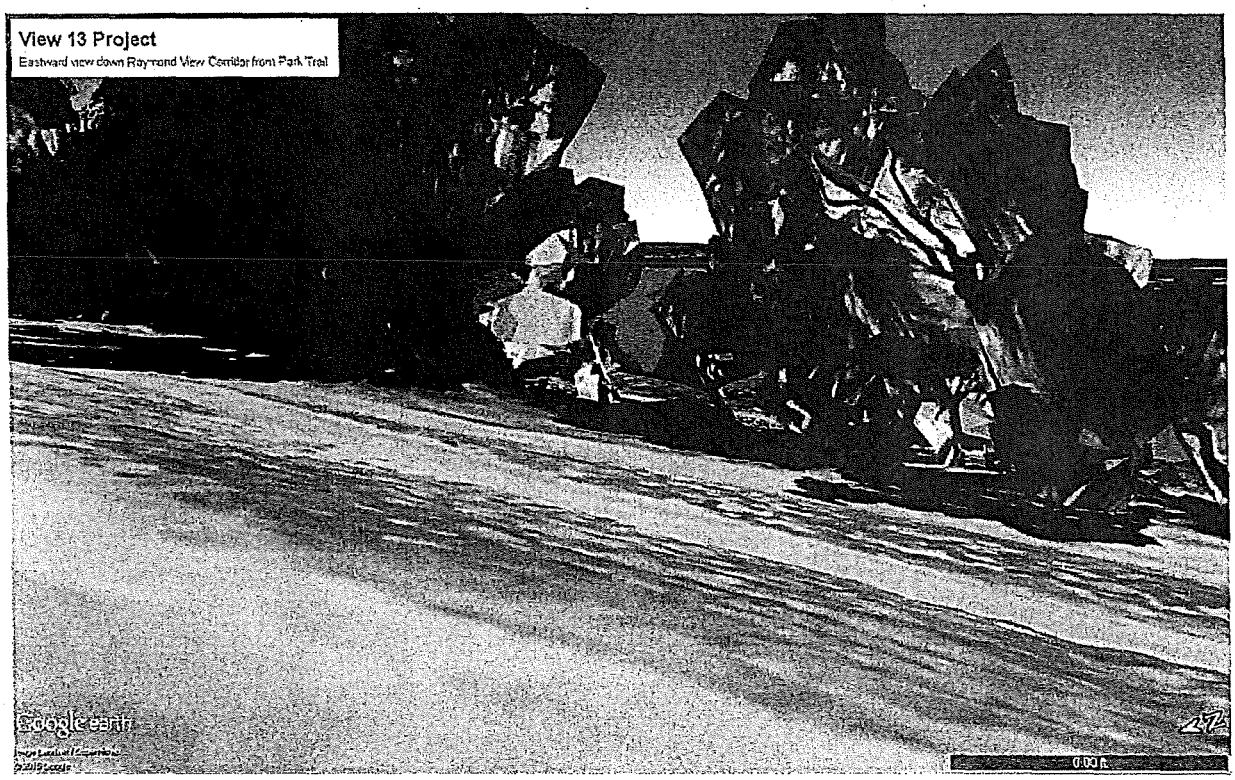
SAN FRANCISCO
PLANNING DEPARTMENT


Map Key
Locations of Photos Numbered
Kendall St
Google earth

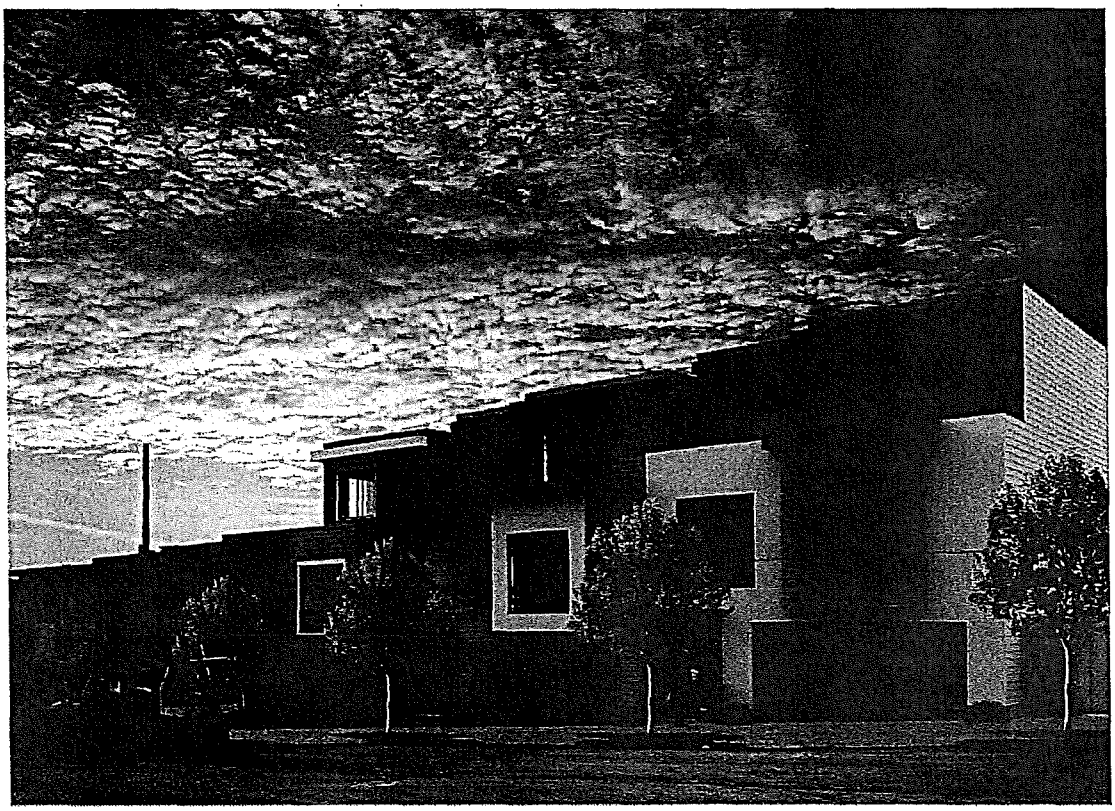

View 11 Existing/Project
Southward view from Visitacion Ave (no view)
Google Earth
702 ft


View 12 Existing/Project
Eastward view down Leland View Corridor from Park Trail (view obscured by trees)
Google earth
8.93 ft

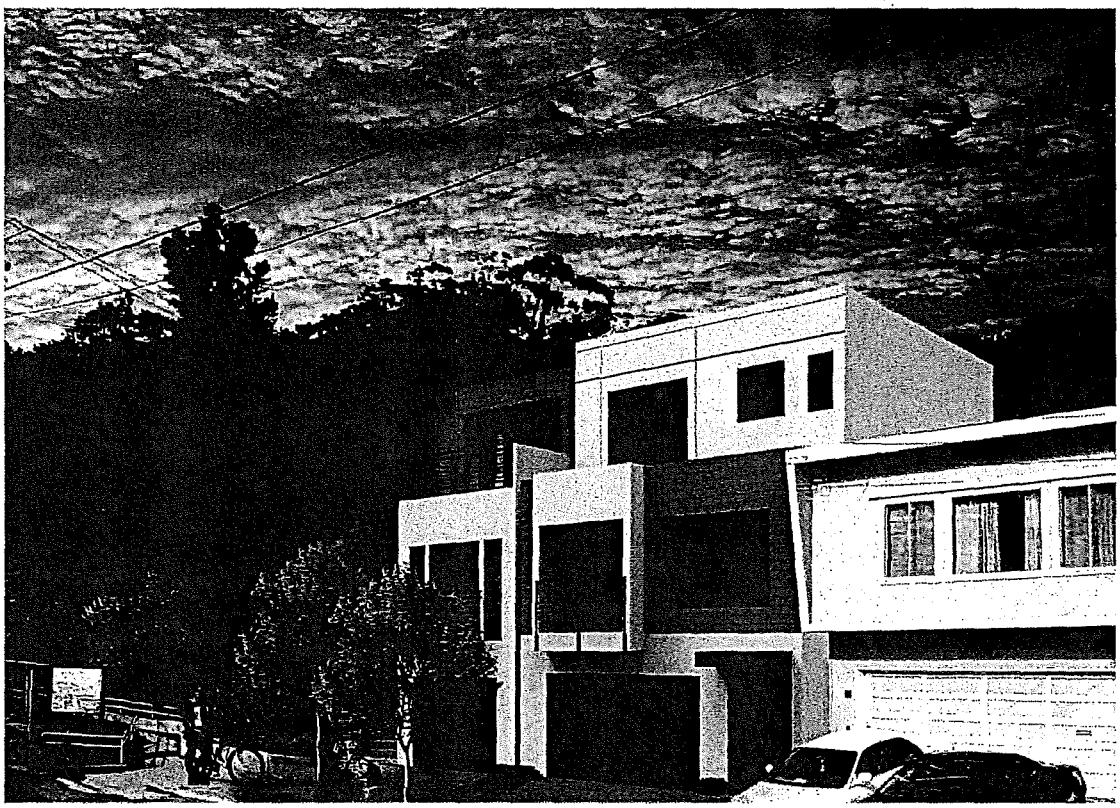

View 13 Existing
Eastward view down Raymond View Corridor from Park Trail
Google earth


View 13 Project
Eastward view down Raymond View Corridor from Park Trail
Google earth

3-D RENDERINGS

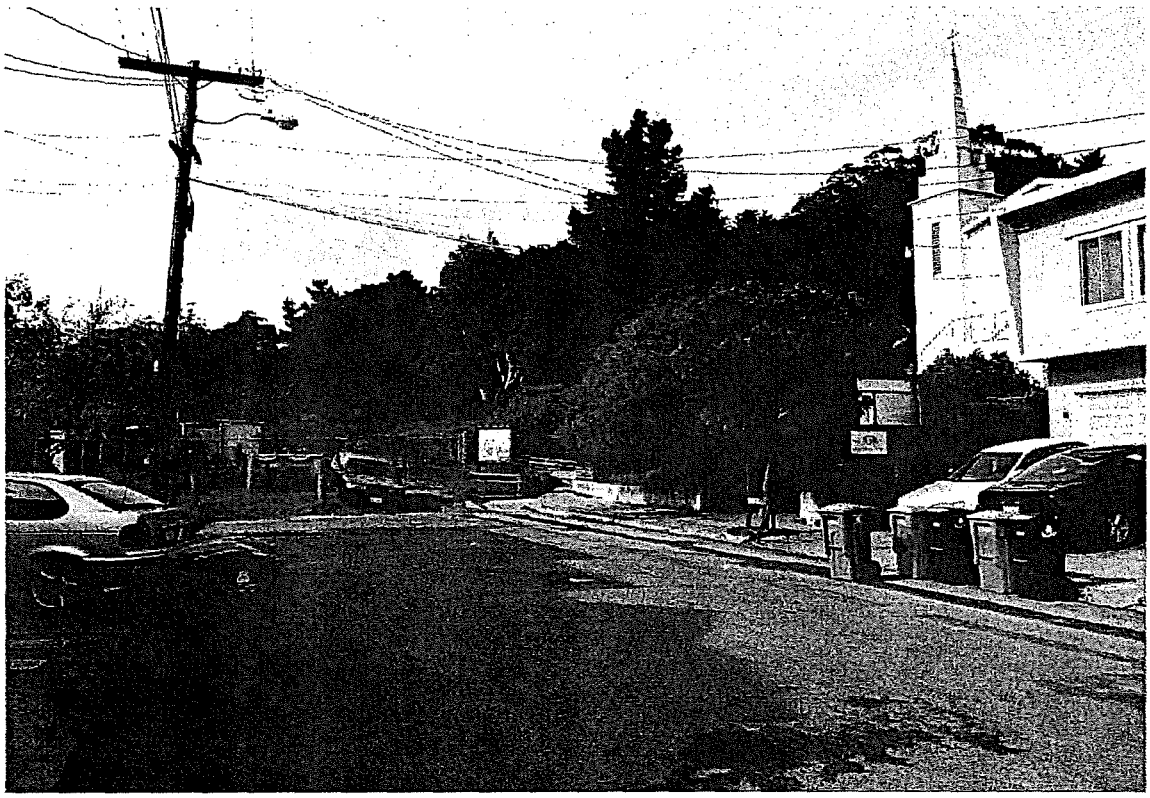


579-583-589 Raymond Avenue Façade Rendering

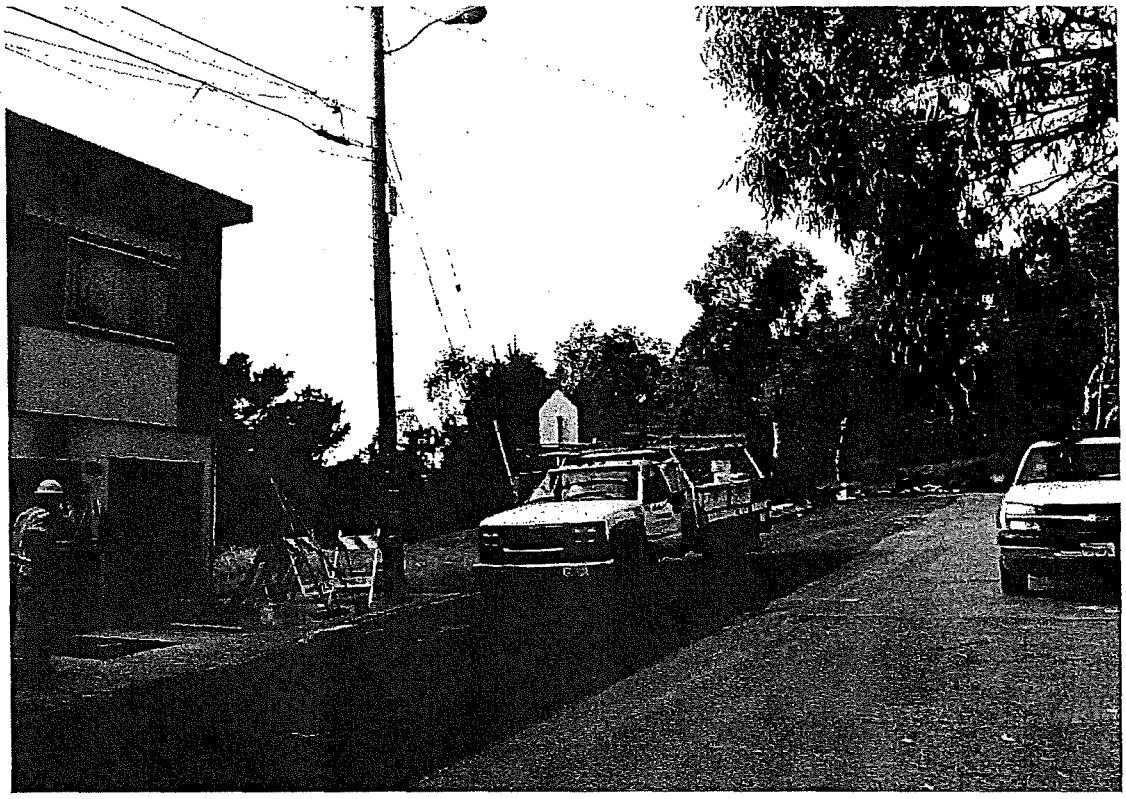


586 – 596 Leland Avenue Rendering

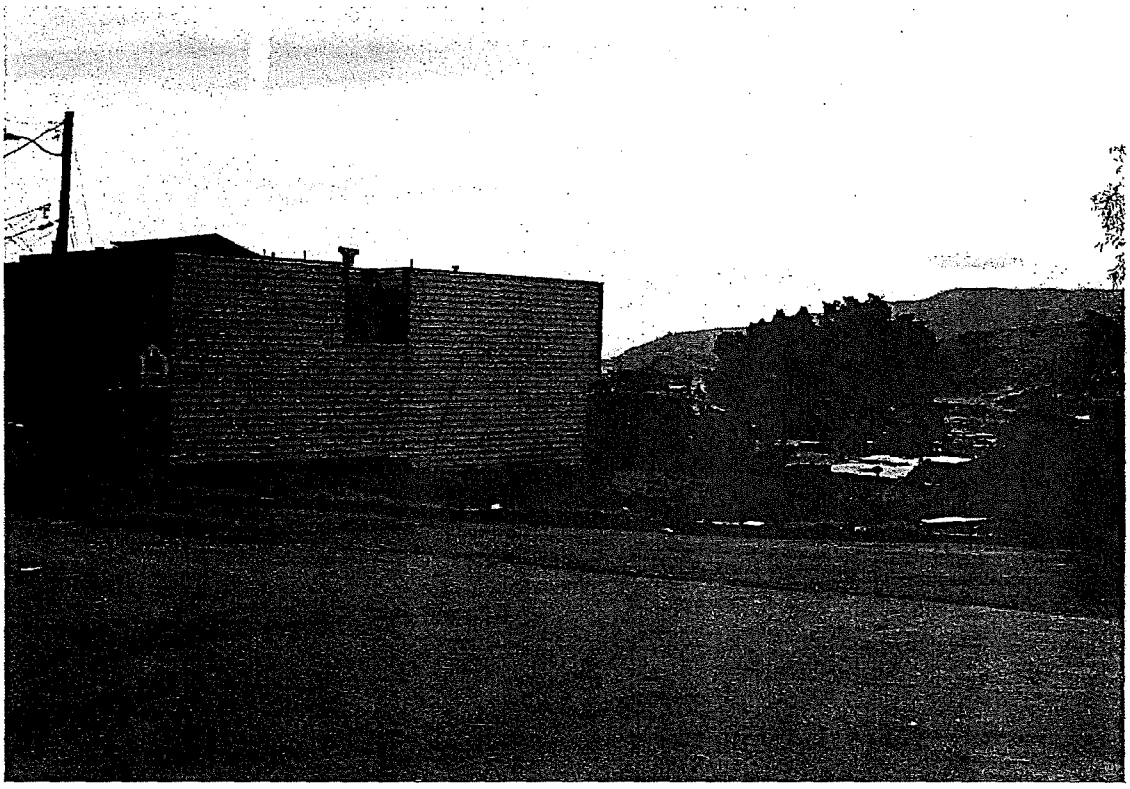
VIEW PHOTOGRAPHS



View #1 Leland Avenue Looking West

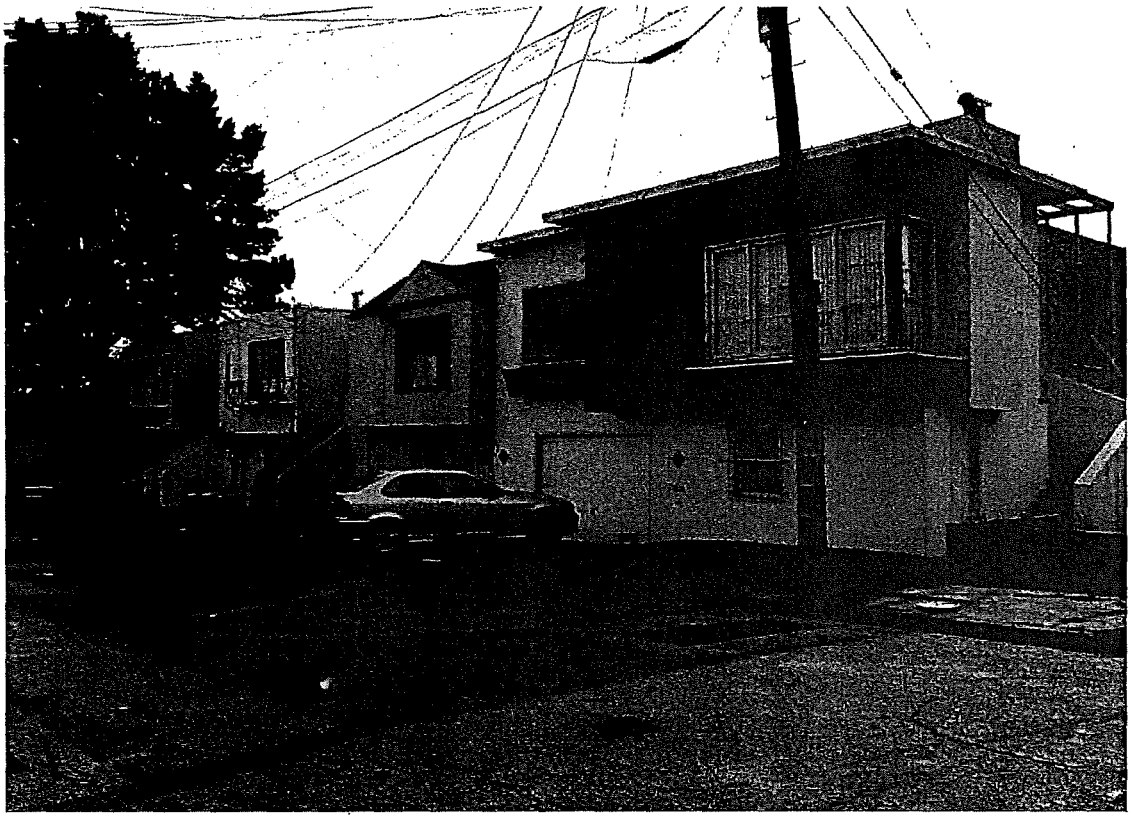


View #3 Raymond Avenue looking west



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

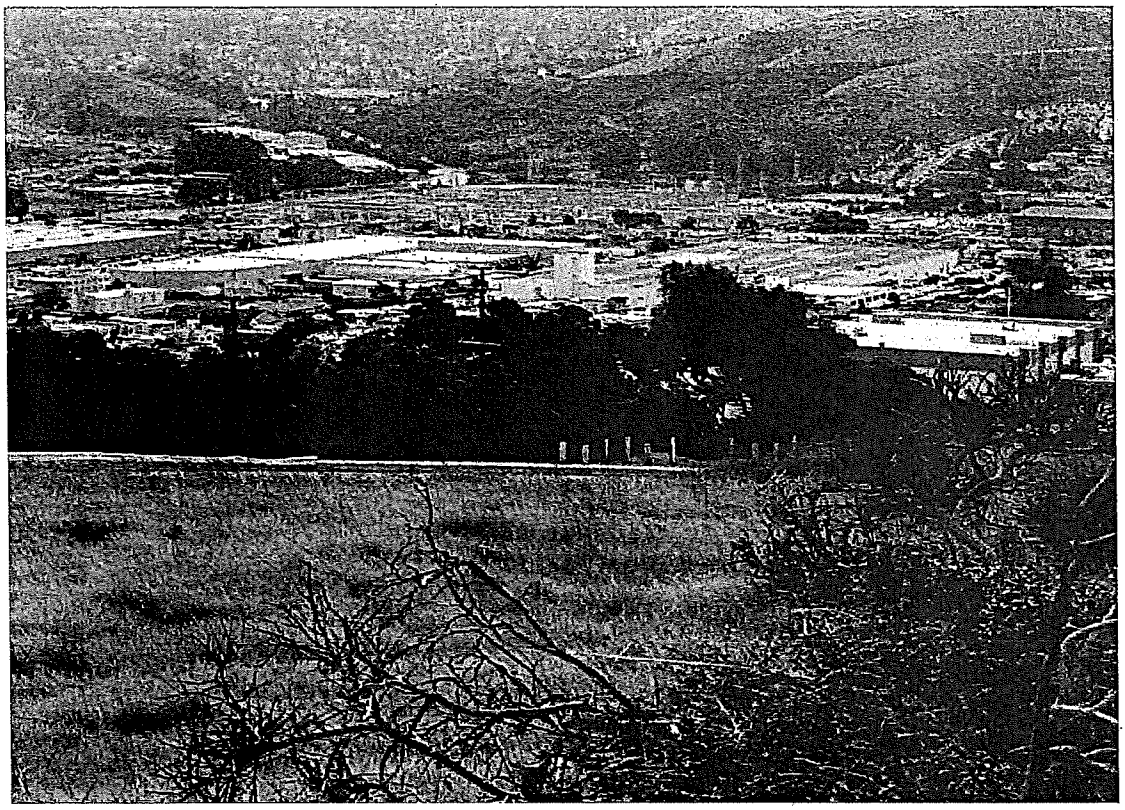
View #4 Vista from Visitacion Avenue Looking East



Leland Avenue Opposite Block Face from project site

Raymond Avenue Opposite Block Face Looking East

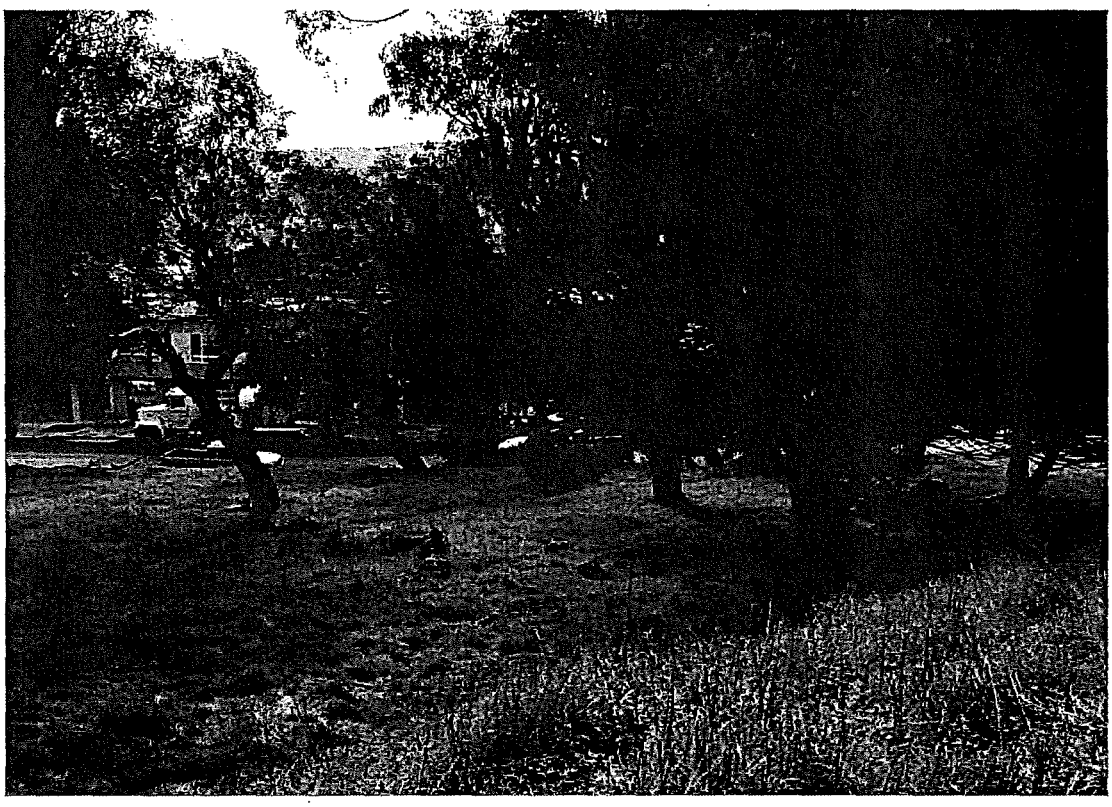
Raymond Avenue Opposite Block Face Looking West



View from Mansell Street Vista Point 1

View from Mansell Street Vista Point 2

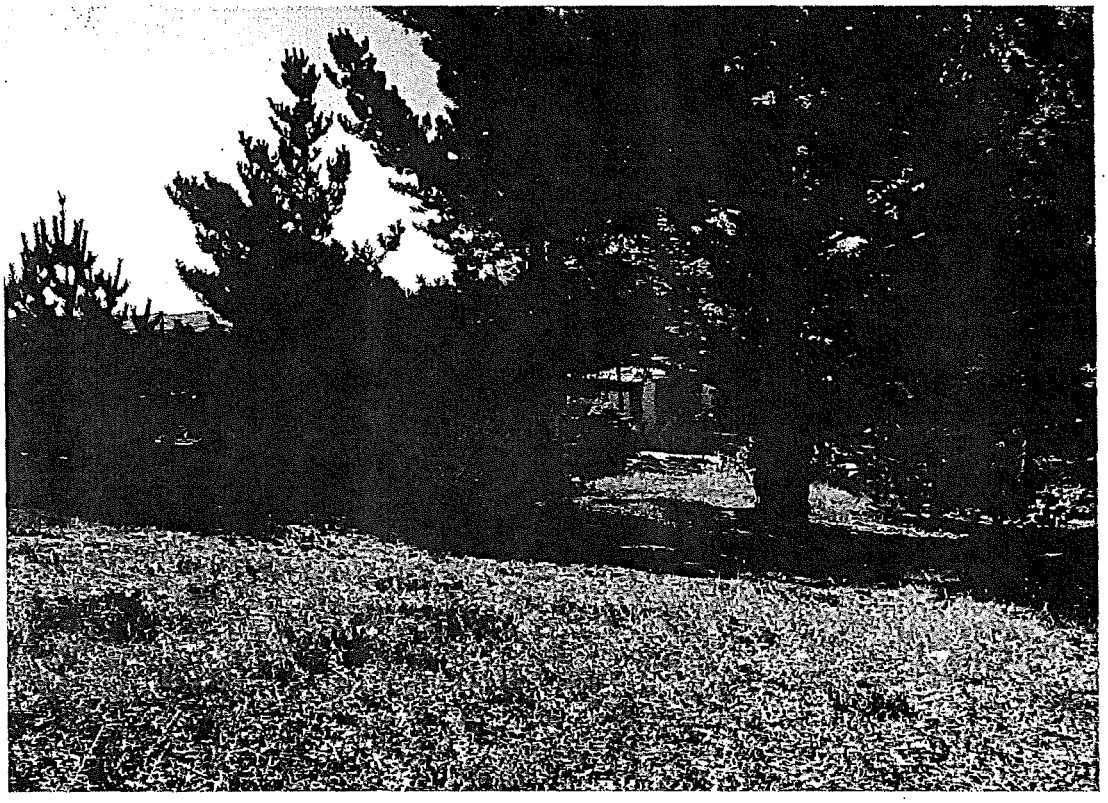
View from Mansell Street Vista Point 3



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

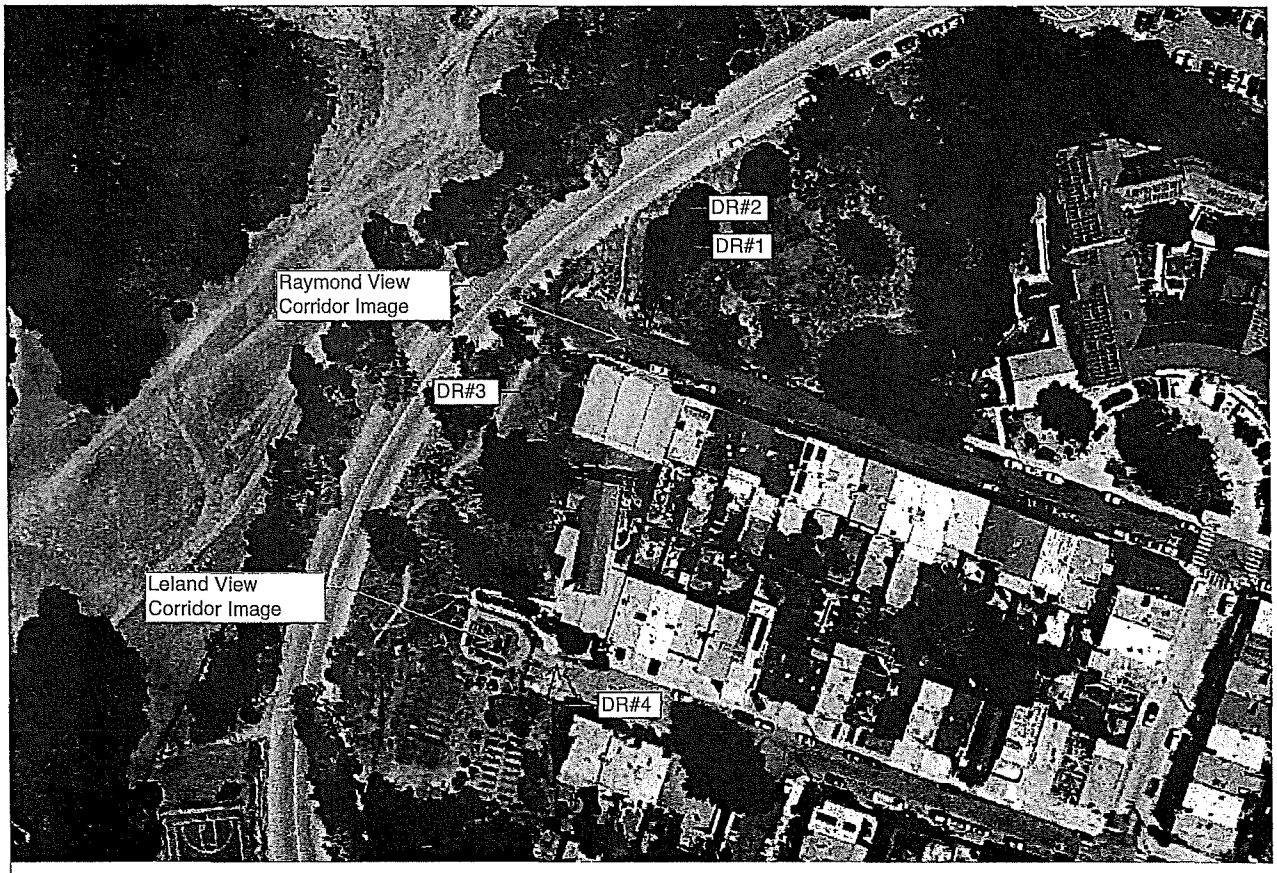
View of Project Site from Visitacion Avenue road 1

Views of Project Site from Visitacion Avenue road 2

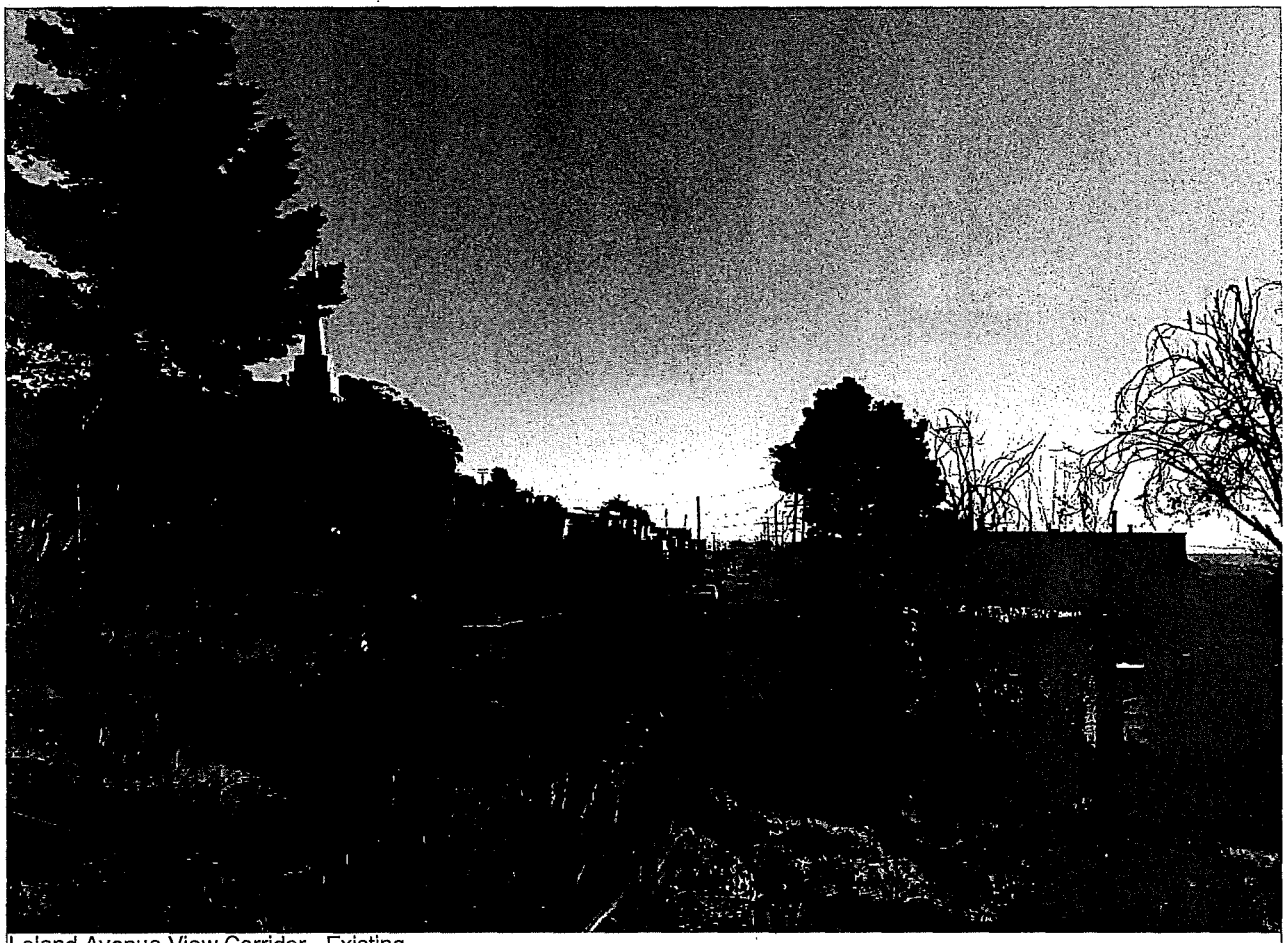


View of Project Site from Visitacion Avenue road 3

VIEW ANALYSIS

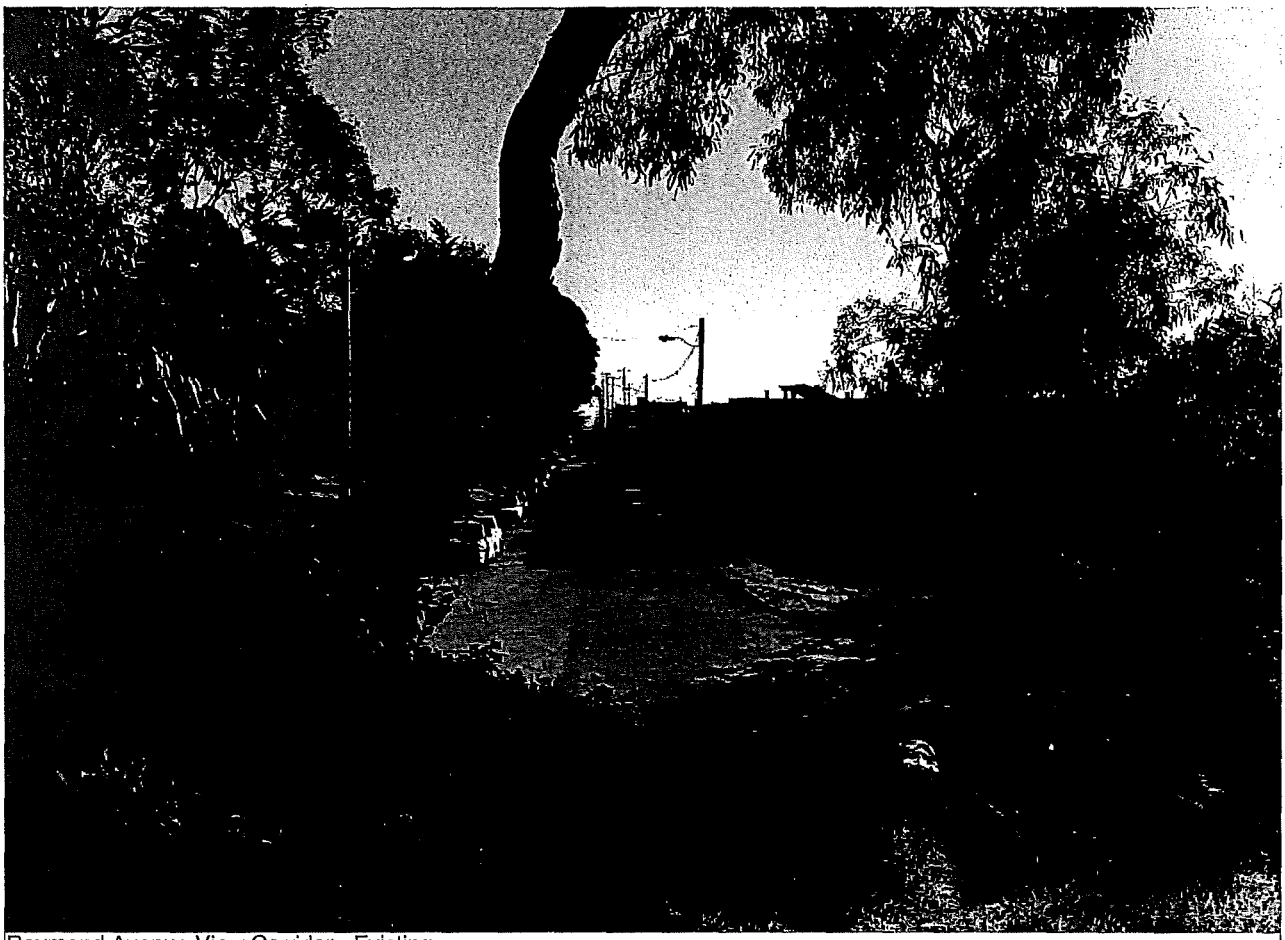


View Study Locations

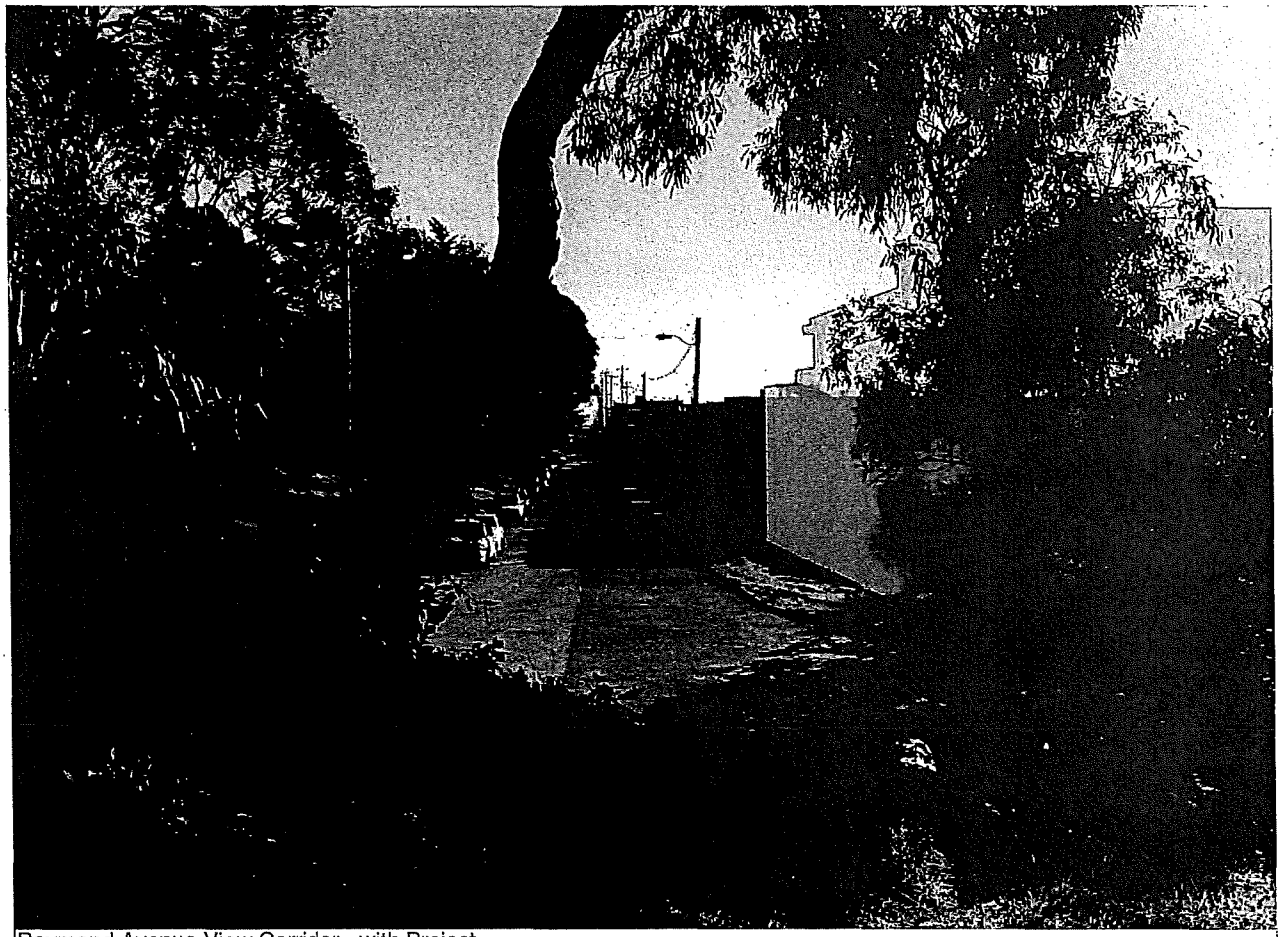


Leland Avenue View Corridor - Existing

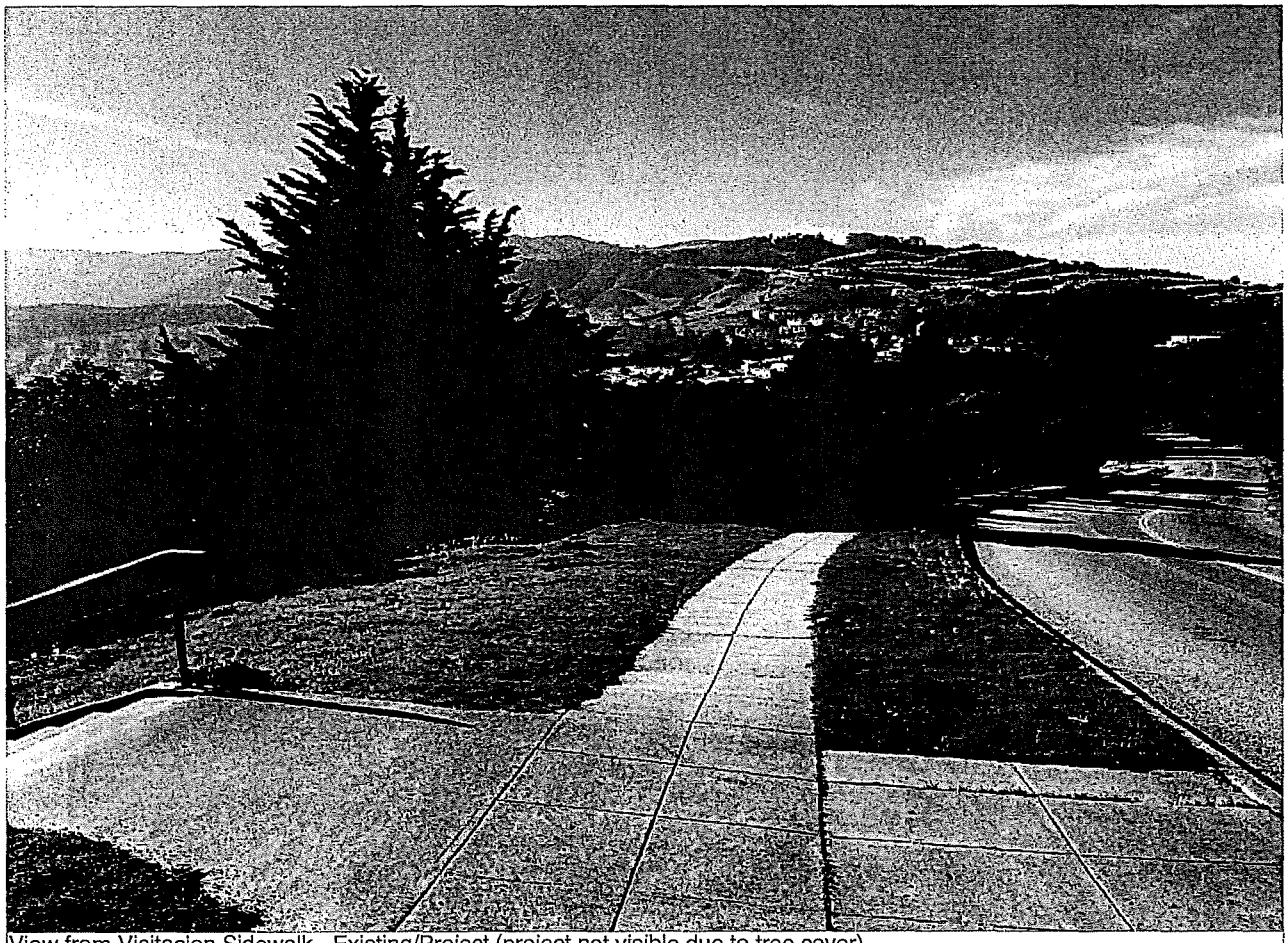
Leland Avenue View Corridor - with Project



Raymond Avenue View Corridor - Existing



Raymond Avenue View Corridor - with Project



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

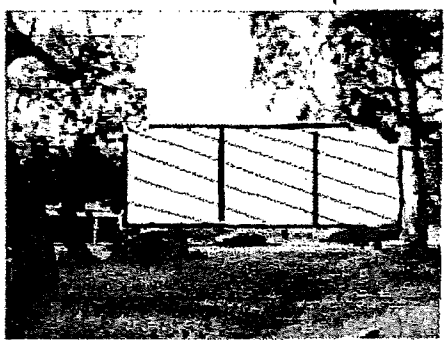
Impact on Views

3

Existing

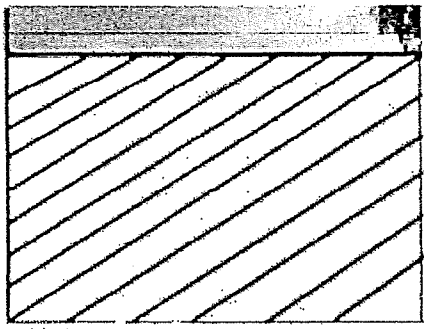
After development

1



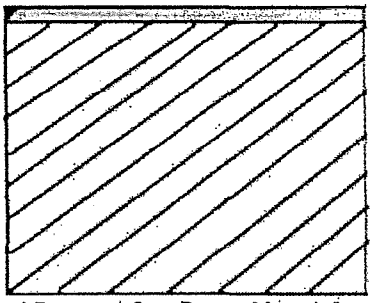
View to South from pathway below V V Middle School

2



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

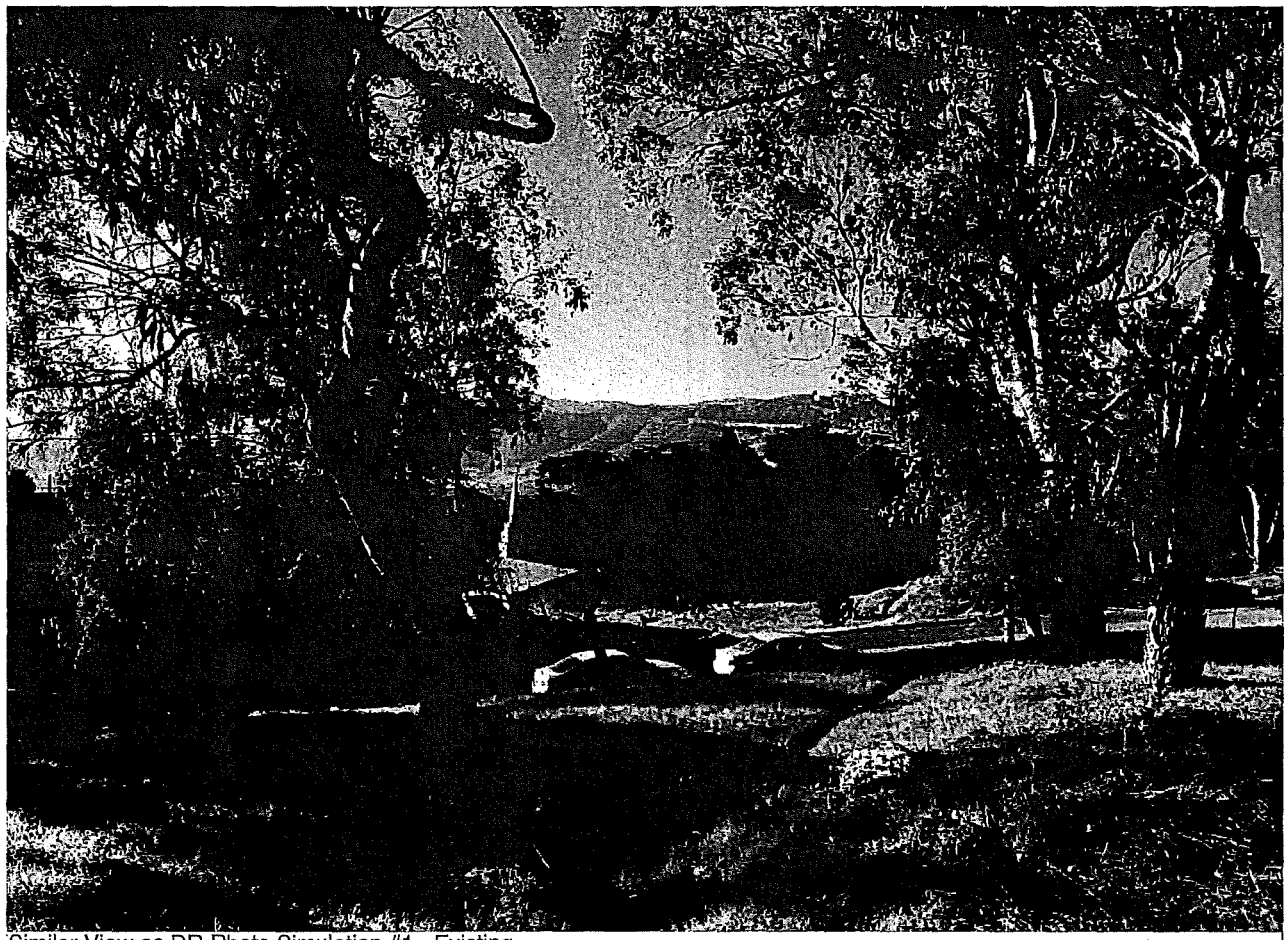
3



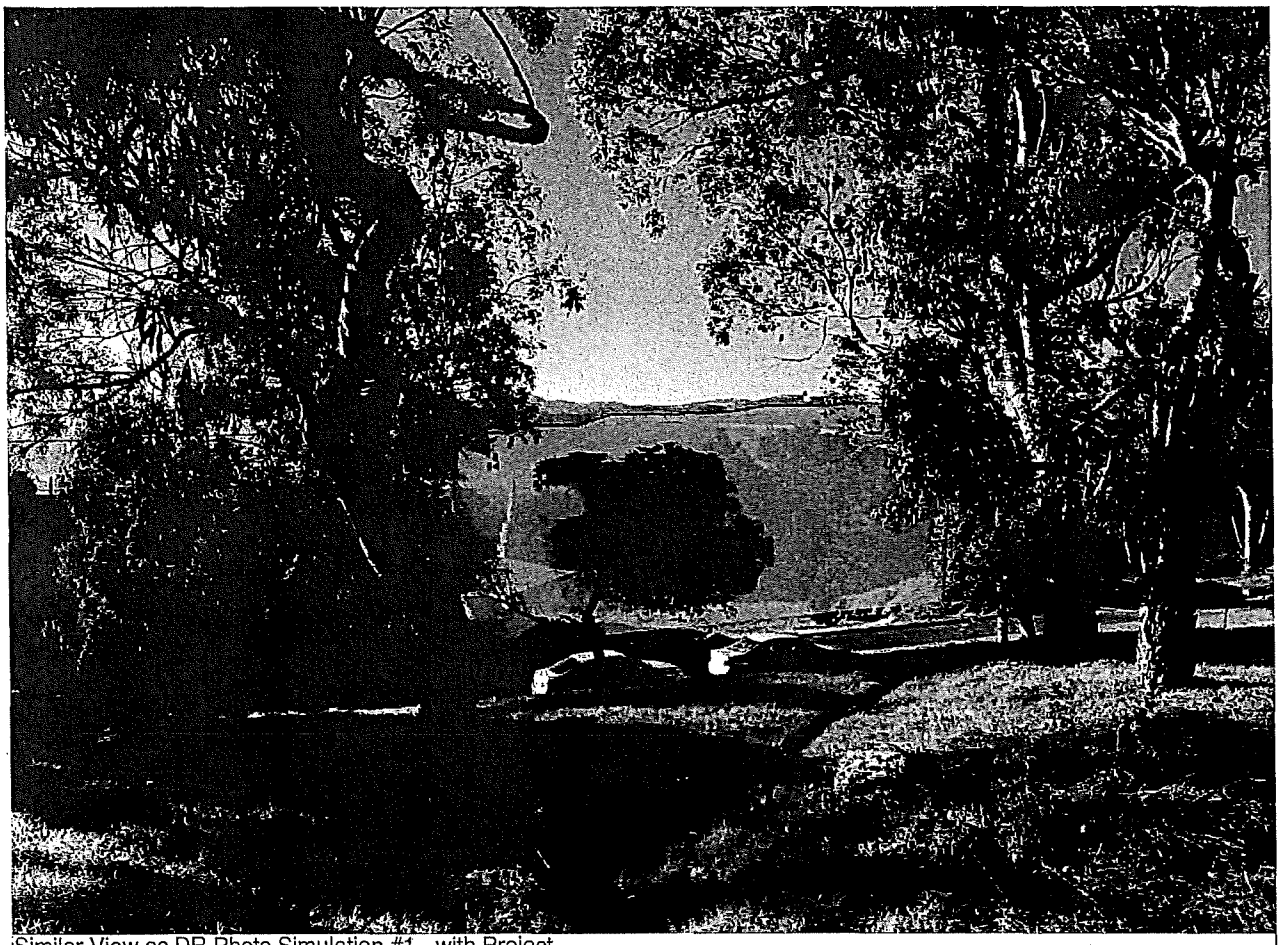
Adjacent to site - Southwest View of Bay and San Bruno Mountain

4

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

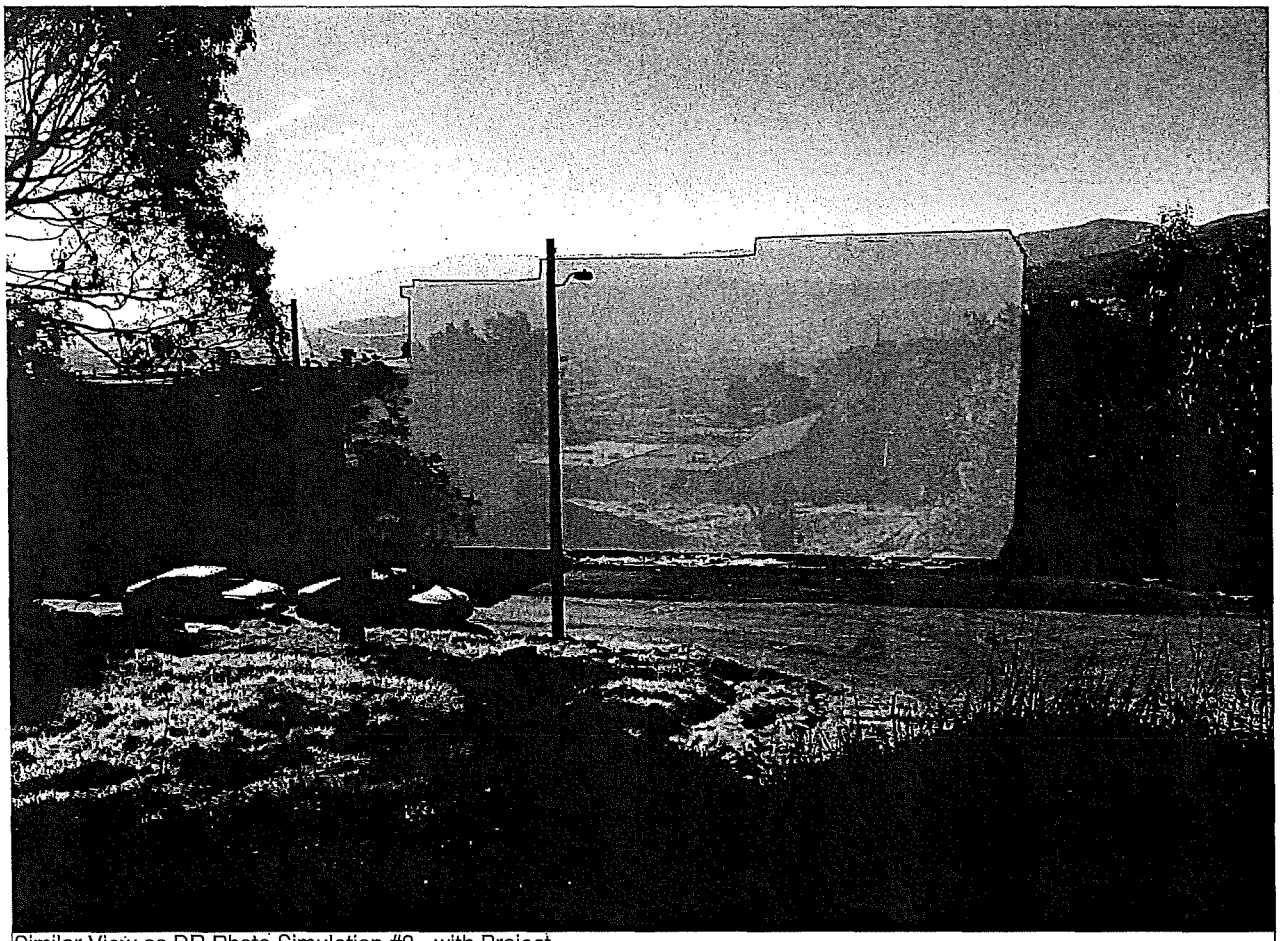


Similar View as DR Photo Simulation #1 - Existing



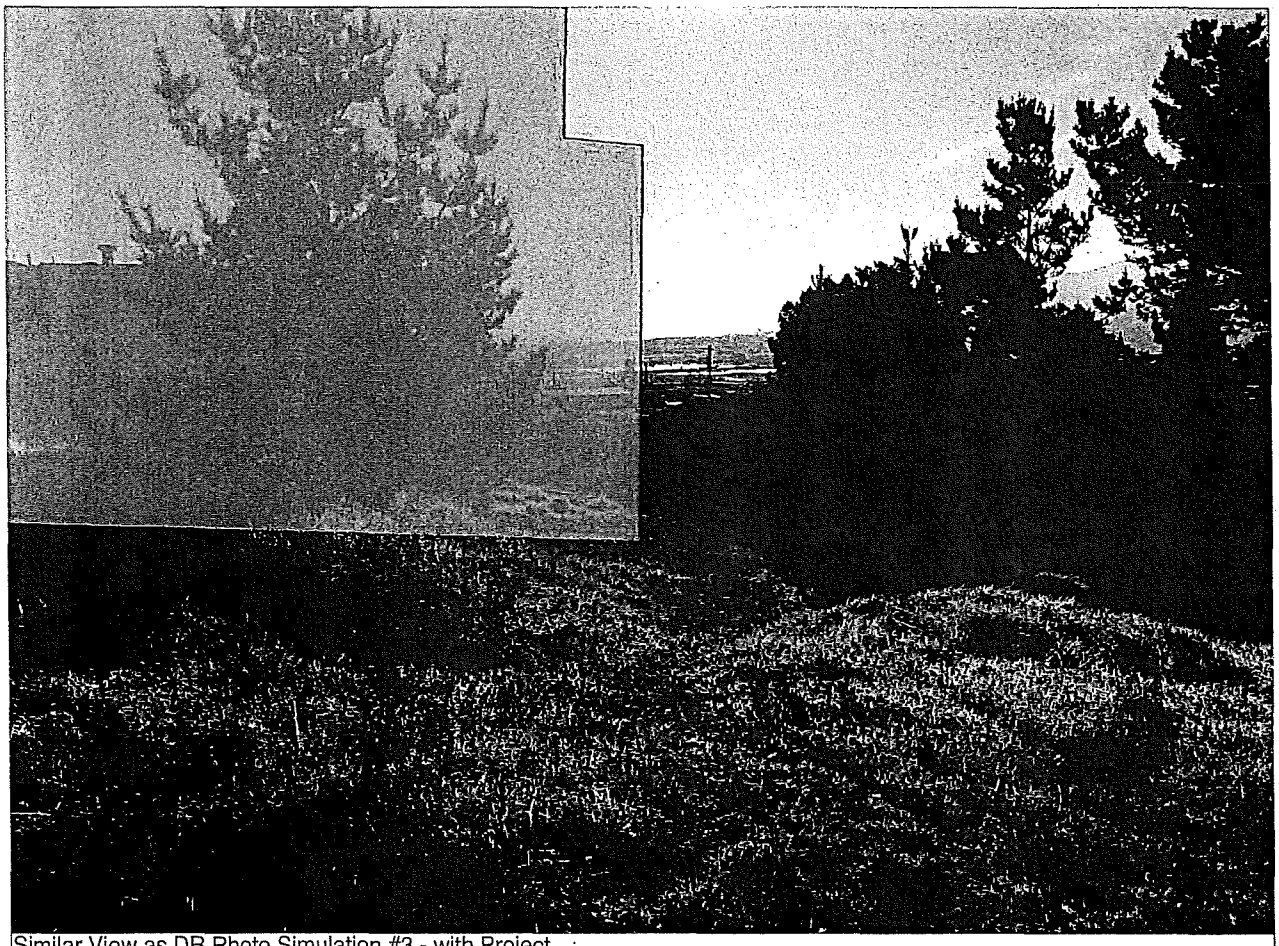
Similar View as DR Photo Simulation #1 - with Project

Similar View as DR Photo Simulation #2 - Existing

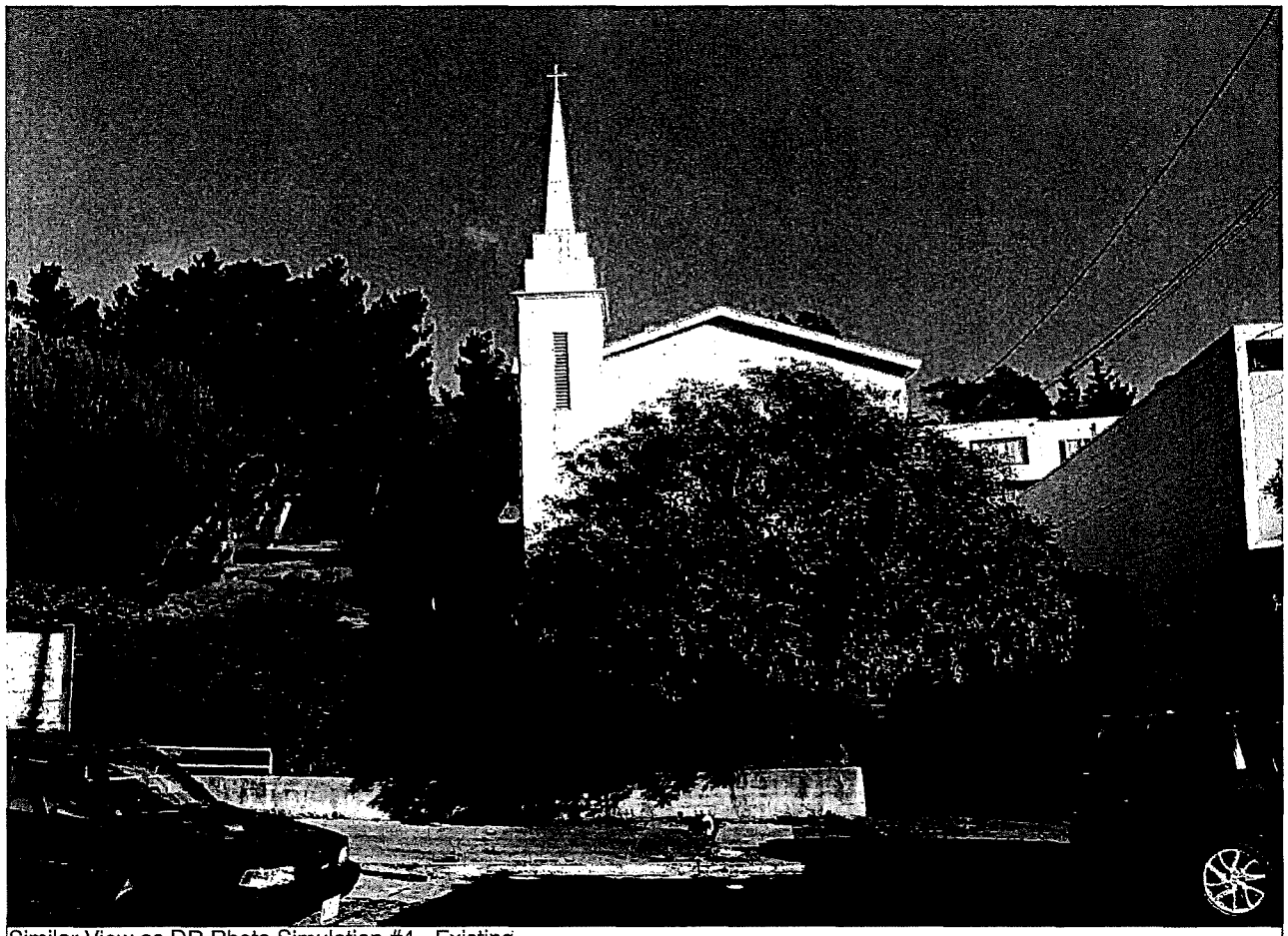


Similar View as DR Photo Simulation #2 - with Project

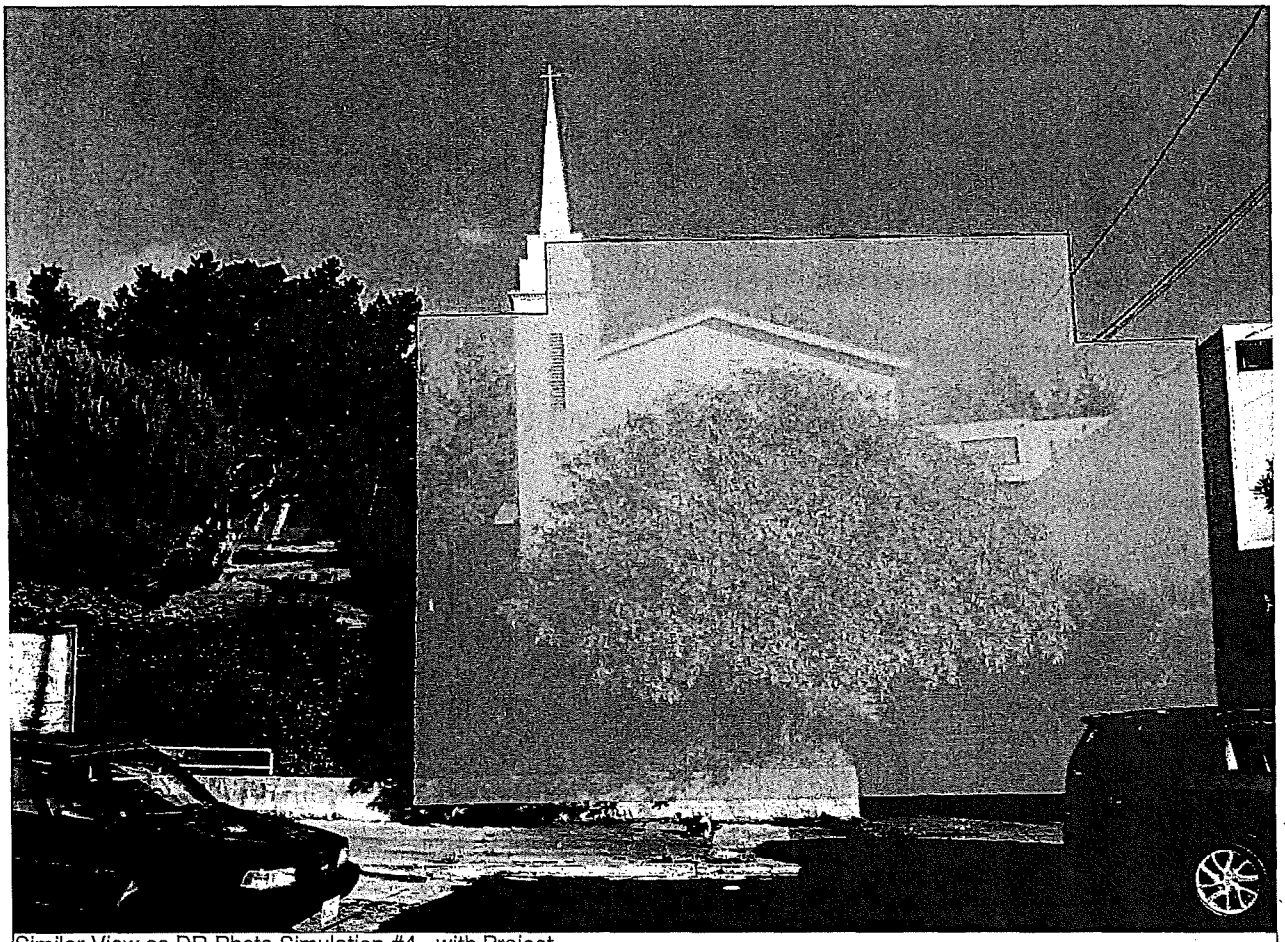
Similar View as DR Photo Simulation #3 - Existing



Similar View as DR Photo Simulation #3 - with Project



Similar View as DR Photo Simulation #4 - Existing



Similar View as DR Photo Simulation #4 - with Project

Lew, Lisa (BOS)

From: BOS Legislation, (BOS)
Sent: Tuesday, March 20, 2018 8:38 AM
To: fma6764860@aol.com; vquan.sf@gmail.com
Cc: GIVNER, JON (CAT); STACY, KATE (CAT); JENSEN, KRISTEN (CAT); Rahaim, John (CPC); Gibson, Lisa (CPC); Sanchez, Scott (CPC); Sider, Dan (CPC); Starr, Aaron (CPC); Cooper, Rick (CPC); Pollak, Josh (CPC); Ionin, Jonas (CPC); Calvillo, Angela (BOS); Somera, Alisa (BOS); BOS-Supervisors; BOS-Legislative Aides; BOS Legislation, (BOS)
Subject: HEARING NOTICE: Appeal of CEQA Exemption Determination - 590 Leland Avenue - Appeal Hearing on April 3, 2018

Categories: 180179

Good morning,

The Office of the Clerk of the Board has scheduled a hearing for Special Order before the Board of Supervisors on **April 3, 2018, at 3:00 p.m.**, to hear an appeal of the Determination of Exemption under CEQA for the proposed project at 590 Leland Avenue.

Please find the following link to the hearing notice for the matter.

Hearing Notice - March 20, 2018

I invite you to review the entire matter on our Legislative Research Center by following the link below:

Board of Supervisors File No. 180179

Regards,

Brent Jalipa
Legislative Clerk
Board of Supervisors - Clerk's Office
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-7712 | Fax: (415) 554-5163
brent.jalipa@sfgov.org | www.sfbos.org

Click here to complete a Board of Supervisors Customer Service Satisfaction form

BOARD of SUPERVISORS

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

NOTICE OF PUBLIC HEARING

BOARD OF SUPERVISORS OF THE CITY AND COUNTY OF SAN FRANCISCO

NOTICE IS HEREBY GIVEN THAT the Board of Supervisors of the City and County of San Francisco will hold a public hearing to consider the following appeal and said public hearing will be held as follows, at which time all interested parties may attend and be heard:

Date: **Tuesday, April 3, 2018**

Time: **3:00 p.m.**

Location: **Legislative Chamber, City Hall, Room 250**
1 Dr. Carlton B. Goodlett, Place, San Francisco, CA

Subject: **File No. 180179.** Hearing of persons interested in or objecting to the determination of exemption from environmental review under the California Environmental Quality Act issued as a Categorical Exemption by the Planning Department on February 12, 2015, for the proposed project at 590 Leland Avenue to demolish an existing church building and construct five new single-family homes across five individual lots; three new three-story single-family residences with roof decks at their respective third stories, at approximately 3,706 gross square feet, and two new three-story single-family residences at 3,506 and 4,372 gross square feet, respectively. (District 10) (Appellant: Fran Martin, on behalf of Visitacion Valley Planning Alliance) (Filed February 20, 2018)

In accordance with Administrative Code, Section 67.7-1, persons who are unable to attend the hearing on this matter may submit written comments prior to the time the hearing begins. These comments will be made as part of the official public record in this matter and shall be brought to the attention of the Board of Supervisors. Written comments should be addressed to Angela Calvillo, Clerk of the Board, City Hall, 1 Dr. Carlton B. Goodlett Place, Room 244, San Francisco, CA, 94102. Information relating to this matter is available in the Office of the Clerk of the Board and agenda information relating to this matter will be available for public review on Friday, March 30, 2018.

Angela Calvillo
Clerk of the Board

BOARD of SUPERVISORS

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

PROOF OF MAILING

Legislative File No. 180179

Description of Items: Public Hearing Notices - Hearing - Appeal of Determination of Exemption From Environmental Review - 590 Leland Avenue - 31 Notices Mailed

I, Brent Jalipa, an employee of the City and County of San Francisco, mailed the above described document(s) by depositing the sealed items with the United States Postal Service (USPS) with the postage fully prepaid as follows:

Date: March 20, 2018

Time: 8:40 a.m.

USPS Location: Repro Pick-up Box in the Clerk of the Board's Office (Rm 244)

Mailbox/Mailslot Pick-Up Times (if applicable): N/A

Signature: Brent Jalipa

Instructions: Upon completion, original must be filed in the above referenced file.

Lew, Lisa (BOS)

From: BOS Legislation, (BOS)
Sent: Wednesday, February 28, 2018 3:33 PM
To: BOS Legislation, (BOS); Ko, Yvonne (CPC)
Subject: APPEAL CHECK PICKUP: Appeal of CEQA Exemption Determination - 590 Leland Avenue - Appeal Hearing on April 3, 2018
Attachments: BoS Appeal Waiver Application 022018.pdf

Categories: 180179

Hi Yvonne,

The appeal check for the proposed 590 Leland Avenue, CEQA Exemption Determination appeal is ready to be picked up here in the Clerk's Office weekdays from 8 a.m. through 5 p.m.

Please be advised the appellant did submit an Appeal Waiver Form (attached) and it will accompany the check.

Regards,
Brent Jalipa
Legislative Clerk
Board of Supervisors - Clerk's Office
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-7712 | Fax: (415) 554-5163
brent.jalipa@sfgov.org | www.sfbos.org

From: BOS Legislation, (BOS)
Sent: Wednesday, February 28, 2018 9:31 AM
To: fma6764860@aol.com; vquan.sf@gmail.com
Cc: GIVNER, JON (CAT) <Jon.Givner@sfcityatty.org>; STACY, KATE (CAT) <Kate.Stacy@sfcityatty.org>; JENSEN, KRISTEN (CAT) <Kristen.Jensen@sfcityatty.org>; Rahaim, John (CPC) <john.rahaim@sfgov.org>; Gibson, Lisa (CPC) <lisa.gibson@sfgov.org>; Sanchez, Scott (CPC) <scott.sanchez@sfgov.org>; Sider, Dan (CPC) <dan.sider@sfgov.org>; Starr, Aaron (CPC) <aaron.starr@sfgov.org>; Cooper, Rick (CPC) <rick.cooper@sfgov.org>; Pollak, Josh (CPC) <josh.pollak@sfgov.org>; Ionin, Jonas (CPC) <jonas.ionin@sfgov.org>; Calvillo, Angela (BOS) <angela.calvillo@sfgov.org>; Somera, Alisa (BOS) <alisa.somera@sfgov.org>; BOS-Supervisors <bos-supervisors@sfgov.org>; BOS-Legislative Aides <bos-legislative_aides@sfgov.org>; BOS Legislation, (BOS) <bos.legislation@sfgov.org>
Subject: Appeal of CEQA Exemption Determination - 590 Leland Avenue - Appeal Hearing on April 3, 2018

Good morning,

The Office of the Clerk of the Board has scheduled an appeal hearing for Special Order before the Board of Supervisors on **April 3, 2018, at 3:00 p.m.** Please find linked below a letter of appeal filed for the proposed project at 590 Leland Avenue, as well as direct links to the Planning Department's timely filing determination, and an informational letter from the Clerk of the Board.

Exemption Determination Appeal Letter - February 20, 2018

Planning Department Memo - February 26, 2018

Clerk of the Board Letter - February 26, 2018

I invite you to review the entire matter on our Legislative Research Center by following the link below:

Board of Supervisors File No. 180179

Regards,

Brent Jalipa
Legislative Clerk
Board of Supervisors - Clerk's Office
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-7712 | Fax: (415) 554-5163
brent.jalipa@sfgov.org | www.sfbos.org

Click here to complete a Board of Supervisors Customer Service Satisfaction form

Disclosures: *Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information provided will not be redacted. Members of the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors' website or in other public documents that members of the public may inspect or copy.*

BOARD of SUPERVISORS

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

February 28, 2018

File Nos. 180179-180182
Planning Case No. 2014-0936E

Received from the Board of Supervisors Clerk's Office one check, in the amount of Five Hundred Ninety Seven Dollars ($597) representing the filing fee paid by Fran Martin, on behalf of the Visitacion Valley Planning Alliance, for the appeal of the CEQA Exemption Determination for the proposed project at 590 Leland Avenue.

Planning Department
By:

Tony
Print Name

3/1/18
Signature and Date

Lew, Lisa (BOS)

From: BOS Legislation, (BOS)
Sent: Wednesday, February 28, 2018 9:31 AM
To: fma6764860@aol.com; vquan.sf@gmail.com
Cc: GIVNER, JON (CAT); STACY, KATE (CAT); JENSEN, KRISTEN (CAT); Rahaim, John (CPC); Gibson, Lisa (CPC); Sanchez, Scott (CPC); Sider, Dan (CPC); Starr, Aaron (CPC); Cooper, Rick (CPC); Pollak, Josh (CPC); Ionin, Jonas (CPC); Calvillo, Angela (BOS); Somera, Alisa (BOS); BOS-Supervisors; BOS-Legislative Aides; BOS Legislation, (BOS)
Subject: Appeal of CEQA Exemption Determination - 590 Leland Avenue - Appeal Hearing on April 3, 2018

Categories: 180179

Good morning,

The Office of the Clerk of the Board has scheduled an appeal hearing for Special Order before the Board of Supervisors on **April 3, 2018, at 3:00 p.m.** Please find linked below a letter of appeal filed for the proposed project at 590 Leland Avenue, as well as direct links to the Planning Department's timely filing determination, and an informational letter from the Clerk of the Board.

Exemption Determination Appeal Letter - February 20, 2018

Planning Department Memo - February 26, 2018

Clerk of the Board Letter - February 26, 2018

I invite you to review the entire matter on our Legislative Research Center by following the link below:

Board of Supervisors File No. 180179

Regards,

Brent Jalipa
Legislative Clerk
Board of Supervisors - Clerk's Office
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San Francisco, CA 94102
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TDD/TTY No. 544-5227

February 26, 2018

Fran Martin
Visitacion Valley Planning Alliance
186 Arleta Avenue
San Francisco, CA 94134

Subject: File No. 180179 - Appeal of CEQA Exemption Determination - 590 Leland Avenue Project

Dear Ms. Martin:

The Office of the Clerk of the Board is in receipt of a memorandum dated February 26, 2018, from the Planning Department regarding their determination on the timely filing of appeal of the CEQA Exemption Determination for the proposed project at 590 Leland Avenue.

The Planning Department has determined that the appeal was filed in a timely manner (copy attached).

Pursuant to Administrative Code, Section 31.16, a hearing date has been scheduled for **Tuesday, April 3, 2018, at 3:00 p.m.**, at the Board of Supervisors meeting to be held in City Hall, 1 Dr. Carlton B. Goodlett Place, Legislative Chamber, Room 250, San Francisco, CA 94102.

Please provide to the Clerk's Office by noon:

20 days prior to the hearing: names and addresses of interested parties to be notified of the hearing, in spreadsheet format; and

11 days prior to the hearing: any documentation which you may want available to the Board members prior to the hearing.

For the above, the Clerk's office requests one electronic file (sent to bos.legislation@sfgov.org) and two copies of the documentation for distribution.

NOTE: If electronic versions of the documentation are not available, please submit 18 hard copies of the materials to the Clerk's Office for distribution. If you are unable to make the deadlines prescribed above, it is your responsibility to ensure that all parties receive copies of the materials.

Continues on next page

If you have any questions, please feel free to contact Legislative Clerks Brent Jalipa at (415) 554-7712, or Lisa Lew at (415) 554-7718.

Very truly yours,

Angela Calvillo
Clerk of the Board

c: Victor Quan, Project Sponsor
Jon Givner, Deputy City Attorney
Kate Stacy, Deputy City Attorney
Kristen Jensen, Deputy City Attorney
John Rahaim, Planning Director
Scott Sanchez, Zoning Administrator, Planning Department
Lisa Gibson, Environmental Review Officer, Planning Department
Aaron Starr, Manager of Legislative Affairs, Planning Department
Dan Sider, Policy Advisor, Planning Department
Rick Cooper, Staff Contact, Planning Department
Josh Pollak, Staff Contact, Planning Department

SAN FRANCISCO
PLANNING DEPARTMENT

MEMO

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

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

DATE: February 26, 2018

TO: Angela Calvillo, Clerk of the Board of Supervisors

FROM: Lisa Gibson, Environmental Review Officer

RE: Appeal Timeliness Determination – 590 Leland Avenue, Planning Department Case No. 2014.0936E

An appeal of the categorical exemption determination for the proposed project at 590 Leland Avenue was filed with the Office of the Clerk of the Board on February 20, 2018 by Fran Martin, on behalf of Visitacion Valley Planning Alliance. As explained below, the appeal is timely.

Date of Approval Action	30 Days after Approval Action	Appeal Deadline (Must Be Day Clerk of Board's Office Is Open)	Date of Appeal Filing	Timely?
January 18, 2018	Saturday, February 17, 2018	Tuesday, February 20, 2018	February 20, 2018	Yes

Approval Action: On February 12, 2015, the Planning Department issued a Categorical Exemption Determination for the demolition of an existing church building, subdivision of the existing lot into five lots, and construction of five single family homes, one on each lot, at 590 Leland Avenue. On January 18, 2018, the Planning Commission took discretionary review and approved the project at 590 Leland Avenue. The Approval Action for the project was the discretionary review hearing by the Planning Commission, as provided for in Planning Code Section 311 (Date of the Approval Action)

Appeal Deadline: Section 31.16(a) and (e) of the San Francisco Administrative Code states that any person or entity may appeal an exemption determination to the Board of Supervisors during the time period beginning with the date of the exemption determination and ending 30 days after the Date of the Approval Action. The 30th day after the Date of the Approval Action was Saturday, February 17, 2018. The next day when the Office of the Clerk of the Board of Supervisors was open was Tuesday, February 20, 2018 (Appeal Deadline).

Appeal Filing and Timeliness: The Appellant filed the appeal of the exemption determination on Tuesday, February 20, 2018, prior to the end of the Appeal Deadline. Therefore, the appeal is considered timely.

Jalipa, Brent (BOS)

From:	BOS Legislation, (BOS)
Sent:	Wednesday, February 21, 2018 3:12 PM
To:	Rahaim, John (CPC)
Cc:	GIVNER, JON (CAT); STACY, KATE (CAT); JENSEN, KRISTEN (CAT); Sanchez, Scott (CPC); Gibson, Lisa (CPC); Navarrete, Joy (CPC); Lynch, Laura (CPC); Sider, Dan (CPC); Starr, Aaron (CPC); Ionin, Jonas (CPC); CPC.Temp.Melinda.Hue; Calvillo, Angela (BOS); Somera, Alisa (BOS); BOS-Supervisors; BOS-Legislative Aides; BOS Legislation, (BOS)
Subject:	Appeal of CEQA Exemption Determination - 590 Leland Avenue - Timeliness Determination Request
Attachments:	Appeal Ltr 022018.pdf; COB Ltr 022118.pdf

Good afternoon, Director Rahaim:

The Office of the Clerk of the Board is in receipt of an appeal of the CEQA Exemption Determination for the proposed project at 590 Leland Avenue. The appeal was filed by Fran Martin, on behalf of the Visitacion Valley Planning Alliance, on February 20, 2018.

Please find the attached letter of appeal and timely filing determination request letter from the Clerk of the Board.

Kindly review for timely filing determination.

Regards,

Brent Jalipa
Legislative Clerk
Board of Supervisors - Clerk's Office
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-7712 | Fax: (415) 554-5163
brent.jalipa@sfgov.org | www.sfbos.org

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TDD/TTY No. 544-5227

February 21, 2018

To: John Rahaim
Planning Director

From: Angela Calvillo
Clerk of the Board of Supervisors

Subject: Appeal of California Environmental Quality Act (CEQA) Determination of Exemption from Environmental Review - 590 Leland Avenue

An appeal of the CEQA Determination of Exemption from Environmental Review for the proposed project at 590 Leland Avenue was filed with the Office of the Clerk of the Board on February 20, 2018, by Fran Martin, on behalf of Visitacion Valley Planning Alliance.

Pursuant to Administrative Code, Chapter 31.16, I am forwarding this appeal, with attached documents, to the Planning Department to determine if the appeal has been filed in a timely manner. The Planning Department's determination should be made within three (3) working days of receipt of this request.

If you have any questions, please feel free to contact Legislative Clerks Brent Jalipa at (415) 554-7712, or Lisa Lew at (415) 554-7718.

c: Jon Givner, Deputy City Attorney
Kate Stacy, Deputy City Attorney
Kristen Jensen, Deputy City Attorney
Scott Sanchez, Zoning Administrator, Planning Department
Lisa Gibson, Environmental Review Officer, Planning Department
Joy Navarette, Environmental Planning, Planning Department
Laura Lynch, Environmental Planning, Planning Department
Dan Sider, Policy Advisor, Planning Department
Aaron Starr, Manager of Legislative Affairs, Planning Department
Melinda Hue, Staff Contact, Planning Department

Print Form

Introduction Form

By a Member of the Board of Supervisors or Mayor

Time stamp
or meeting date

I hereby submit the following item for introduction (select only one):

- ☐ 1. For reference to Committee. (An Ordinance, Resolution, Motion or Charter Amendment).
- ☐ 2. Request for next printed agenda Without Reference to Committee.
- ☑ 3. Request for hearing on a subject matter at Committee.
- ☐ 4. Request for letter beginning :"Supervisor [ ] inquiries"
- ☐ 5. City Attorney Request.
- ☐ 6. Call File No. [ ] from Committee.
- ☐ 7. Budget Analyst request (attached written motion).
- ☐ 8. Substitute Legislation File No. [ ]
- ☐ 9. Reactivate File No. [ ]
- ☐ 10. Question(s) submitted for Mayoral Appearance before the BOS on [ ]

Please check the appropriate boxes. The proposed legislation should be forwarded to the following:

☐ Small Business Commission ☐ Youth Commission ☐ Ethics Commission

☐ Planning Commission ☐ Building Inspection Commission

Note: For the Imperative Agenda (a resolution not on the printed agenda), use the Imperative Form.

Sponsor(s):

Clerk of the Board

Subject:

Appeal of Determination of Exemption From Environmental Review - 590 Leland Avenue

The text is listed:

Hearing of persons interested in or objecting to the determination of exemption from environmental review under the California Environmental Quality Act issued as a Categorical Exemption by the Planning Department on February 12, 2015, for the proposed project at 590 Leland Avenue to demolish an existing church building and construct five new single-family homes across five individual lots; three new three-story single-family residences with roof decks at their respective third stories, at approximately 3,706 gross square feet, and two new three-story single-family residences at 3,506 and 4,372 gross square feet, respectively. (District 10) (Appellant: Fran Martin, on behalf of Visitacion Valley Planning Alliance) (Filed February 20, 2018)

Signature of Sponsoring Supervisor: Alisa Somera

For Clerk's Use Only

fr 180179