Coalition for San Francisco

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February 20, 2018

Page 1 of 2

TO: Treasure Island Development Authority, San Francisco Planning Department, San Francisco Planning Commission, San Francisco Board of Supervisors

FROM: George Wooding, President, Coalition for San Francisco Neighborhoods (CSFN)

CSFN RESOLUTION SUPPORTING ALTERNATIVE OPTION FOR CLIPPER COVE

WHEREAS, Treasure Island's Clipper Cove is a unique harbor that is San Francisco's largest and most valuable protected open water cove;

WHEREAS, a new development proposed by Treasure Island Enterprises, to demolish the existing small boat marina in Clipper Cove and construct a new luxury marina dedicated exclusively for very large yachts running 40'-80' in length, would damage existing recreational, educational, and cultural activities in Clipper Cove and would pose a significant unidentified threat to the ecology of the Cove;

WHEREAS, presently Clipper Cove is the home to San Francisco's only community sailing center, the Treasure Island Sailing Center (TISC), which provides sailing for several thousand youth each year, including a sailing STEM program for over 1,500 San Francisco Unified School District (SFUSD) 4th graders, most of whom have their first experience on the Bay through this program;

WHEREAS, the proposed development would increase the footprint of the marina from 7% of the Cove to 32% of the Cove, displacing Sailing Center activities, entirely blocking some beginning sailors from the inner Cove where the water is most protected and reducing the area available for recreational boaters to anchor overnight in the calm waters found in Clipper Cove;

WHEREAS, found underwater in the southern portion of Clipper Cove is valuable native eelgrass which provides important habitat for wildlife in San Francisco Bay;

WHEREAS, according to the State of California, the wave attenuator wall proposed as part of the new luxury marina is likely to generate new siltation in the Cove requiring regular maintenance dredging, factors that could likely negatively impact the eelgrass without proper mitigation;

WHEREAS, in a feasibility study on the proposed project, the State of California noted that similar development at the San Francisco Marina by the Marina Green resulted in unanticipated siltation, the dredging of which currently runs to \$500,000 a year and recommended budgeting \$150,000 a year in maintenance dredging for the proposed Clipper Cove project, a recommendation the developers have declined to accept;

WHEREAS, the State's estimate of dredging costs documents that the project sponsor, Treasure Island Enterprises, has not studied nor identified the potential threat of changing siltation and has not identified mitigation measures to protect the eelgrass;

THEREFORE, BE IT RESOLVED, that the Coalition for San Francisco Neighborhoods (CSFN) opposes the proposed marina development and endorses the Treasure Island Sailing Center (TISC) minimum impact alternative option for Clipper Cove. Under the alternative option, the number of berths in the marina would double and the average berth would increase in length from 31ft. to a maximum of 42ft. This compromise would allow for a dramatic increase in the development of Clipper Cove but still have minimum impact on public access to Clipper Cove and minimum impact on the health of the Bay.

THEREFORE, BE IT FURTHER RESOLVED, that the City of San Francisco should evaluate how any proposed marina development would impact sedimentation in Clipper Cove before approving said proposal.

Sincerely,

Wooding

George Wooding President CSFN

March 6, 2018

Honorable Jane Kim San Francisco Board of Supervisors 1 Dr. Carlton B. Goodlett Place City Hall, Room 244 San Francisco, CA 94102-4689 [Jane.Kim@sfgov.org]

Dear Supervisor Kim:

I write on behalf of US Sailing to share our opposition to the recent proposal forwarded by the Treasure Island Development Authority (TIDA) to expand the existing marina in Clipper Cove.

As the National Governing Body for the sport of sailing, US Sailing's mission is to provide leadership for the sport of sailing in the United States.

The proposal adopted by TIDA on October 30, 2017, would dramatically reduce public access to Clipper Cove and significantly diminish the public recreation and education programs operated by the Treasure Island Sailing Center, particularly the Center's youth programs. Clipper Cove, widely recognized as one of the best small boating venues on the West Coast, would be significantly and permanently diminished.

The Treasure Island Sailing Center in Clipper Cove is one of 35 Community Sailing Centers in the United States accredited by US Sailing. These Community Sailing Centers have proven to be engines for community development across the United States and represent the fastest growing segment in the sport of sailing.

We believe diversity is essential to the sport of sailing and Community Sailing Centers are at the forefront of bringing diversity to the sport. For us, diversity refers to the differences of culture, ethnicity, race, gender, age, beliefs, religion, socioeconomic status, sexual orientation, family status, physical ability, appearance and ideas. We are committed to achieving greater diversity throughout the sport and fostering an environment that is more inclusive. TISC has helped an unbelievable number of underserved kids in San Francisco who otherwise would have no access to the bay or to sailing's unique ability to develop their self-reliance, independence, citizenship, problem solving skills and overall self-image.

To help us achieve our mission, we seek to identify organizations that provide the highest quality of education and support access to sailing for all. These are organizations that align with the standards set forth by US Sailing and offer safety, fun and learning through their programming. The Treasure Island Sailing Center in Clipper Cove meets these standards and more.

We strongly urge you to work toward marina development that preserves public access to Clipper Cove and supports the Treasure Island Sailing Center that brings so much to San Francisco.

Thank you for your attention here.

Sincerely,

Jack Gierhart CEO, US Sailing

1 Roger Williams University Way Bristol, RI 02809

P 401.342.7900 F 401.342.7940 info@ussailing.org www.ussailing.org





DIVISION OF CURRICULUM & INSTRUCTION, STEM – SCIENCE DEPARTMENT 750 25th Avenue, San Francisco, CA 94121 T 415,508-7378 F 415,750-8575 WWW.SFUSD.EDU

May 19, 2017

R. Zachary Wasserman, Chair Bay Conservation and Development Commission 455 Golden Gate Avenue, Suite 10600 San Francisco, CA 94102-7019 via email: brad.mccrea@bcdc.ca.gov

Dear Mr. Wasserman:

On behalf of the Science Department of the San Francisco Unified Public School District, I write to encourage the Bay Conservation and Development Commission to protect Clipper Cove at Treasure Island. This ask echoes the US Sailing Association and the Sierra Club in urging you to reject the recent marina expansion proposal forwarded by Treasure Island Enterprises.

Over the past three years over thirty-five SFUSD elementary schools have participated in the sailing STEM classes taught on Clipper Cove by the Treasure Island Sailing Center (TISC). The classes are full STEM (*science*, technology, engineering, and mathematics) curricula that meet 4th grade Next Generation Science Standards (NGSS). They include: Ecology of the Bay, Maritime History, and Power of the Wind. As part of the Science Enrichment Pathway, I have been able to fund dozens of students in the past semester to attend, all with glowing reviews of their experiences.

These classes are making a vital contribution to our work in the classroom, and more importantly they are making a significant contribution in the development of our students. For many of the students these classes are their first on-the-water experience of San Francisco Bay.

However, the Treasure Island Sailing Center has been explicit that the proposed marina expansion would significantly harm their programs and would significantly reduce public access (especially for beginning sailors), including a 25% reduction of the sailing area used by the STEM program. For full detail and documentation, see the April 17, 2017 note posted on the Sailing Center's website here: https://tisailing.org/resources/news-and-press-releases

Clipper Cove is an extremely valuable public resource. Due to unique geography it provides the extremely rare combination of good wind, flat water, and no currents. It is recognized as one of the best small boat venues on the west coast and is ideal for teaching youth sailing. About 10 times the size of McCovey Cove, Clipper cove is by far and away San Francisco's most important protected open water.

As proposed, the marina expansion would have a dramatic negative impact on public education and public recreation on the San Francisco Bay.

Under this proposal, the marina would expand from covering 7% of the Cove to covering 31% of the Cove, an

expansion of 342%, permanently eliminating public access to 1/3rd of the Cove. In addition, the configuration of the marina footprint would leave only a narrow and challenging entrance to the Cove, effectively blocking beginning sailors from the Cove. High school and collegiate racing will be pushed part way out of the Cove, mandating the expense of additional safety boats as well as prompting additional racing limitations and cancellations when conditions outside the Cove become dangerous. [For documentation see at link above.]

The Treasure Island Sailing Center, through its many programs, gets thousands of people sailing out on the water every year. Most impressively, many low-income youth have a chance to learn how to sail, a chance that in all likelihood they would not have without the Center and Clipper Cove. The Sailing Center is a very special institution - no one is ever turned away. Full and partial scholarships are always available for it's summer and after-school programs. The US Sailing Association recently awarded the Treasure Island Sailing Center the Kilroy award given annually each year to a program that has made "notable contributions in promoting public access sailing by identifying and actively including people who would normally have no access to sailing."

By teaching youth how to sail on Clipper Cove, the Treasure Island Sailing Center is fostering a generation of Bay Area residents who understand the value of the Bay and will work to protect this vital public resource. The San Francisco Bay Plan specifically recognizes the importance of recreation to conservation: "Participating in recreation activities on the Bay and along its shoreline can inspire an appreciation of the Bay and can motivate people to participate in the responsible management and protection of the Bay." (San Francisco Bay Plan, reprinted March 2012, at p. 58.)

The STEM classes offered on Clipper Cove through the Sailing Center are making an invaluable contribution to our students. These classes are also providing our students with an important introduction of the San Francisco Bay. Protecting the Cove is vital to maintaining the integrity of these classes.

We urge to protect Clipper Cove and reject the proposed marina expansion.

Sincerely,

Vanessa Carter

Vanessa Carter Environmental Literacy Content Specialist

October 4, 2017

Hon. V. Fei Tsen - Chair TIDA Board of Directors One Avenue of the Palms, Suite 241 San Francisco, California 94130 Via Bob Beck <bob.beck@sfgov.org>

cc: San Francisco Supervisor Jane Kim

Dear Chair Tsen:

We write as San Francisco elementary school teachers to encourage the Treasure Island Development Authority to protect Clipper Cove at Treasure Island. And we join the US Sailing Association and the Sierra Club in urging you to reject the recent marina expansion proposal forwarded by Treasure Island Enterprises.

Over the past three years over thirty-five SFUSD elementary schools as well as several private elementary schools have participated in the sailing STEM classes taught on Clipper Cove by the Treasure Island Sailing Center (TISC). The classes are full STEM (science, technology, engineering, and mathematics) curricula that meet 4th grade Next Generation Science Standards (NGSS). They include: Ecology of the Bay, Maritime History, and Power of the Wind.

These classes are making a vital contribution to our work in the classroom, and more importantly they are making a significant contribution in the development of our students. For many of the students these classes are their first on-the-water experience of San Francisco Bay.

However, the Treasure Island Sailing Center has been explicit that the proposed marina expansion would significantly harm their programs and would significantly reduce public access (especially for beginning sailors), including a 25% reduction of the sailing area used by the STEM program. For full detail and documentation, see the April 17, 2017 note posted on the Sailing Center's website here: https://tisailing.org/resources/news-and-press-releases

Clipper Cove is an extremely valuable public resource. Due to unique geography it provides the extremely rare combination of good wind, flat water, and no currents. It is recognized as one of the best small boat venues on the west coast and is ideal for teaching youth sailing. About 10 times the size of McCovey Cove, Clipper cove is by far and away San Francisco's most important protected open water. As proposed, the marina expansion would have a dramatic negative impact on public education and public recreation on the San Francisco Bay.

Under this proposal, the marina would expand from covering 7% of the Cove to covering 32% of the Cove, an expansion of 357%, permanently eliminating public access to 1/3rd of the Cove. In addition, the configuration of the marina footprint would leave only a narrow and challenging entrance to the Cove, effectively blocking beginning sailors from the Cove. High school and collegiate racing will be pushed part way out of the Cove, mandating the expense of additional safety boats as well as prompting additional racing limitations and cancellations when conditions outside the Cove become dangerous. [For documentation see at link above.]

The Treasure Island Sailing Center, through its many programs, gets thousands of people sailing out on the water every year. Most impressively, many low-income youth have a chance to learn how to sail, a chance that in all likelihood they would not have without the Center and Clipper Cove. The Sailing Center is a very special institution - no one is ever turned away. Full and partial scholarships are always available for it's summer and after-school programs. The US Sailing Association recently awarded the Treasure Island Sailing Center the Kilroy award given annually each year to a program that has made *"notable contributions in promoting public access sailing by identifying and actively including people who would normally have no access to sailing."*

By teaching youth how to sail on Clipper Cove, the Treasure Island Sailing Center is fostering a generation of Bay Area residents who understand the value of the Bay and will work to protect this vital public resource. The San Francisco Bay Plan specifically recognizes the importance of recreation to conservation: "Participating in recreation activities on the Bay and along its shoreline can inspire an appreciation of the Bay and can motivate people to participate in the responsible management and protection of the Bay." (San Francisco Bay Plan, reprinted March 2012, at p. 58.)

The STEM classes offered on Clipper Cove through the Sailing Center are making an invaluable contribution to our students. These classes are also providing our students with an important introduction of the San Francisco Bay. Protecting the Cove is vital to maintaining the integrity of these classes.

We urge you to protect Clipper Cove and reject the proposed marina expansion.

Sincerely,

Christine Armstrong Alvarado Elementary Amy Lee Jefferson Elementary

Victoria Bautista Jefferson Elementary Christine Linder Miraloma Elementary Annie Roach McKinley Elementary

William Warrant Bessie Carmichael

Chris Weiss Sunnyside Elementary

Liz Zarr Glen Park Elementary

Jill Radwanski Jefferson Elementary

Liana Kholer Gordon J. Lau Elementary

Vivian Mak Gordon J. Lau Elementary

Jennifer Partika Argonne Elementary

Kim Towlsey Argonne Elementary

William Nadel Argonne Elementary William Warrant Bessie Carmichael

El Walden Ulloa Elementary

Kathy Angus Argonne Elementary

Marta Alvarez Paul Revere Elementary

Mei Wong Alice Fong Yu Elementary

Jessica Thompson Daniel Webster Elementary

Patricia Juri Argonne Elementary

Brenda Douville Gordon J. Lau Elementary

Krisi Luo Gordon J. Lau Elementary

Zoe Wadkins Former Program Director and STEM Coordinator, Treasure Island Sailing Center



October 9, 2017

Board of Directors Treasure Island Development Authority One Avenue of Palms, Suite 241 San Francisco, CA 94130 Email: <u>Bob.Beck@sfgov.org</u>

Re: Clipper Cove Marina Expansion

Dear TIDA Board of Directors:

On October 2, 2016, San Francisco Baykeeper ("Baykeeper") sent a letter to Hunter Cutting with Save Clipper Cover noting our opposition to and concern with the proposed marina expansion project at Clipper Cove on Treasure Island ("Project"). (*See* attached as Exhibit A). Baykeeper was primarily concerned about the impacts to the present users from the proposed development and the outdated and inadequate environmental review of the Project. Although the Project has changed, we remain concerned about the same issues. Thus, we reiterate and incorporate those earlier comments herein, and are writing to express the following additional concerns.

First, Baykeeper remains concerned that the Project will have adverse impacts on the important youth programs that take place at Clipper Cove. These programs allow youth (and adults) to interact with the Bay, cementing a knowledgeable and caring relationship with the Bay going forward. The Treasure Island Sailing Club has noted that the space available for their programs after the proposed Project is the *minimum* needed for their programs. However, the Project will certainly impact the sailing programs. The Project will take 32% of the area currently used by the Sailing Club and other recreationalists, significantly reducing the area available. In addition, as planned, the Project will cause changes in Clipper Cove that may not allow many beginners to sail there. Finally, with the proposed Project there is no room for these programs to grow, while the need for safe places to access the Bay will certainly grow.

Second, we are concerned that the EIR for this Project is now 11 years old. No supplemental EIR has been prepared, yet the baseline conditions and the Project have changed significantly since the EIR was prepared. In our original letter, Baykeeper noted that the EIR fails to analyze water quality impacts from increasing motorized boat use. Moreover, the EIR does not consider the impacts of this Project on the eelgrass beds in Clipper Cove. The dredging necessary for this Project could likely have a negative impact on the eelgrass beds, but that impact was not evaluated in the EIR. Before approving this Project, the California Environmental Quality Act requires TIDA analyze and mitigate for these impacts.

Third, we are concerned about the economic viability of the Project. The economic model relies on renting the live-aboard slips for over \$3,000 per month, which is over three times the rental fee for any other marina in the Bay. It is unclear that this business model is sustainable, and Baykeeper is concerned about the environmental and recreational impacts to Clipper Cove if the Project is unsuccessful or if it is unable to go beyond Phase 1. For example, will there be additional

Baykeeper Page 2 October 9, 2017

environmental impacts or additional impacts to current recreational users if the Project is unsuccessful or only implements Phase 1? It is important that these potential impacts be analyzed before approving the Project.

In conclusion, while considering this Project, we urge you to ensure that access for current and potential recreational users, as well as the water quality and natural plant communities, are protected. The current plan for the Project does not appear to do so. If you have any questions, please contact me at <u>erica@baykeeper.org</u>.

Yours truly,

Erica A. Maharg

Managing Attorney

CC: Supervisor Jane Kim, Jane.Kim@sfgov.org

EXHIBIT A

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SAN FRANCISCO BAYKEEPER®

October 2, 2016

Hunter Cutting Save Clipper Cove Email: huntercutting@gmail.com

Dear Mr. Cutting:

Thank you for informing me about the proposed expansion of Clipper Cove Marina ("Project") located on Treasure Island. After reviewing the proposed Project and the environmental impact report ("EIR") prepared for the Project, Baykeeper shares your concerns about the marina expansion. As described in greater detail below, Baykeeper is concerned about the impact the Project will have on present recreational users of Clipper Cove and whether the EIR prepared for the Project adequately evaluates and mitigates for the environmental impacts of the Project as currently proposed.

Baykeeper is a non-profit organization that works to protect and enhance the water quality and natural resources of San Francisco Bay, its tributaries, and other waters in the Bay Area, for the benefit of its ecosystems and communities. Baykeeper has over 5,000 members and supporters, many of whom use San Francisco Bay on a regular basis for recreation, including sailing, kite surfing, swimming, and kayaking. Our mission is not only to ensure that the Bay is safe and healthy to recreate in the Bay, but also to work to protect and promote public access.

1. The Marina Expansion Will Negatively Impact Present Users' Access to and Enjoyment of Clipper Cove.

Baykeeper is concerned that the marina expansion will deprive present and future users of Clipper Cove of a safe and accessible place to access the Bay. Clipper Cove has become a community asset where many people access the Bay for recreation. The Treasure Island Sailing Center, through its many programs, gets thousands of people sailing out on the water every year. Most impressively, many low-income youth have a chance to learn how to sail, a chance that in all likelihood they would not have without the Center and Clipper Cove.

By teaching kids how to sail, the Treasure Island Sailing Center is creating a future generation of people who understand the value of the Bay and will work to protect this vital public resource. The San Francisco Bay Plan specifically recognizes the importance of recreation to conservation: "Participating in recreation activities on the Bay and along its shoreline can inspire an appreciation of the Bay and can motivate people to participate in the responsible management and protection of the Bay." (San Francisco Bay Plan, reprinted March 2012, at p. 58.)

The current layout of Clipper Cove, with a smaller marina in the northwest corner, provides enough area for the Treasure Island Sailing Center to conduct sailing lessons in a safe way. Moreover, it provides a large area for non-motorized watercraft, such as kayaks and stand-up



Pollution hotline: 1 800 KEEP BAY www.baykeeper.org 1736 Franklin Street, Suite 800 Oakland, CA 94612 (510) 735-9700 paddleboards. The current proposal for the Project, by greatly expanding the footprint of the marina, will significantly reduce the area available for sailing instruction and non-motorized watercraft. Further, the increased boat traffic due to the expanded marina will likely increase the potential for accidents between new sailors and marina users. Any agency approving the Project should closely look to ensure that sailors and non-motorized watercraft users will not be threatened by increased traffic through Clipper Cove.

Baykeeper understands that there is a lack of sufficient marina space in San Francisco Bay, and we generally support efforts to increase public access, including marinas, in the Bay. However, Clipper Cove already has a thriving community of recreational users. Any expansion or modification of Clipper Cove must ensure that the present users can continue to recreate there in a safe and fun way. It appears that, in order to do that, the Project as currently proposed should decrease its footprint, either by reducing the number of berths or decreasing the size of the berths.

2. The 2006 EIR Should Likely Be Revised to Consider Changes at Clipper Cove and the Proposed Project.

An EIR for the Project was prepared in 2006, about ten years ago. The age of the EIR calls into question whether the analysis in the document is still accurate. Conditions at the site likely have changed, such as increased recreation use or changes in biological resources. Moreover, the Project evaluated in the EIR appears to have been modified in the latest proposal. Although the number of slips at the marina has remained the same, the marina's footprint has significantly expanded. These changes could cause increased impacts, such as impacts to water quality and public safety as a result of increased conflicts between motorized and non-motorized watercraft.

Where a project for which an EIR has been prepared is later modified or the circumstances under which it is to be carried out change, a subsequent or supplemental EIR may be required. (*See* Pub. Res. Code § 21166; *Save Our Neighborhood v. Lishman* (2006) 140 Cal.App.4th 1288, 1295 (*Save Our Neighborhood*).) Public Resources Code section 21166 provides that a subsequent or supplemental EIR shall be required if substantial changes are proposed in the project, or occur with respect to the circumstances under which the project will be undertaken, which require major revisions to the EIR, or if new and previously unknown information becomes available. (Pub. Res. Code § 21166; *see also* 14 Cal. Code Regs. §§ 15162-15164.)

Any agency approving the Project should evaluate the changes in the Project and the changes at the site since the EIR was certified to determine whether a subsequent EIR should be prepared. Preparing a supplemental EIR will ensure public participation in the Project and will provide decisionmakers with the information needed to make an informed decision, meeting the purposes of CEQA. (*See Woodward Park Homeowners Assn., Inc. v. City of Fresno* (2007) 150 Cal. App. 4th 683, 691 [The basic purposes of CEQA are "to inform the public and decision makers of the consequences of environmental decisions before those decisions are made," and "to protect and maintain California's environmental quality."].)

Baykeeper is particularly concerned about the potential water quality impacts of increasing motorized boat traffic at Clipper Cove. Motorized boats can pollute the water with oil and gas; in addition, detergents, sewage, metals, and other pollutants can discharge depending on how the boat

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is maintained. It does not appear that the 2006 EIR considered these impacts at all. (*See* EIR, Chapter 4.) The San Francisco Bay Plan prohibits any new marina or marina expansion "unless water quality and circulation will be adequately protected and, if possible, improved." (San Francisco Bay Plan at 62.) The EIR does not provide sufficient analysis to make this finding, and any agency approving the Project must fill this information gap prior to approval.

In short, before finalizing approval of the Project, the responsible agencies should ensure that any proposal protects current users and the character of Clipper Cove marina as a community resource. Moreover, Baykeeper asks any agency to make sure that increased use will not impact the water quality of the area. If you have any questions, please contact me at erica@baykeeper.org.

Yours truly,

Erica A. Maharg Managing Attorney