

From: Steven Hill [<mailto:hill@steven-hill.com>]  
Sent: Sunday, December 11, 2011 11:35 PM  
To: [bill.wycko@sfgov.org](mailto:bill.wycko@sfgov.org); [don.lewis@sfgov.org](mailto:don.lewis@sfgov.org)  
Subject: don't ruin the western end of GG Park

From: Steven Hill, Outer Sunset resident  
4315 Lincoln Way  
San Francisco, CA 94122

Mr. Bill Wycko  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission St. Room 400  
San Francisco, CA 94103

Subject: BEACH CHALET ATHLETIC FIELDS RENOVATION  
Draft Environmental Impact Report  
Planning Department Case No. 2010.0016E  
State Clearinghouse No. 2011022005

Dear Mr. Wycko and Mr. Lewis:

I live in the Outer Sunset, very close to the area that you are proposing to rip up and add bright stadium lights at night. I live on Lincoln Way at 45th Avenue, so these ball fields are a seven minute walk from my house. In other words, VERY CLOSE. As San Francisco has such small yards, this is like my backyard. I go for walks down there at night, and love the darkness and quiet of the park, with the ocean waves resounding nearby. At night I have seen fox, heard owls. I see many red-tail and red-shouldered hawks. I can hear the wind swoosh thru the pine and redwood trees. It is magic.

Your proposed plan will completely wreck what is special about this end of the park. COMPLETELY. WRECK. IT. This kind of uber-development is more appropriate for the eastern end of the park, where you already have substantial development, the museums, etc. Please leave us in the Outer Sunset alone, we like things as they are, with darkness so we can see the stars and enjoy the quiet and a little bit of solitude in an urban setting.

01

You are trampling on people out here in the Outer Sunset. Please consider the impact on those of us who live here. Thank you.

I would like to receive a printed copy of the Comments and Responses and the Final EIR by mail.

Please let me know that you have received this letter. I would like to hear back from you. Thank you.

Sincerely,

Steven Hill  
4315 Lincoln Way  
San Francisco, CA 94122

December 7, 2011

Mr. Bill Wycko  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission St., Suite 400  
San Francisco, CA 94103

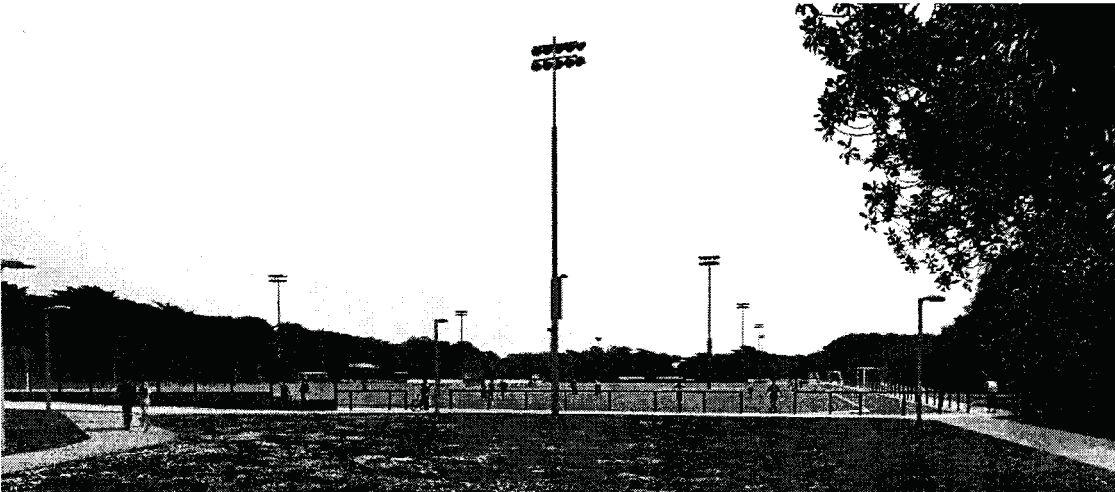
Subject: Beach Chalet Athletic Fields DEIR – Case No. 2010.0016E (State Clearinghouse No. 2011022005)

Dear Mr. Wycko,

The DEIR has major flaws and is inaccurate and incomplete with the findings on aesthetic impacts. I oppose completely turfing it artificially and with all the big lights.

01

For example, the criteria for judging visual impacts are arbitrary and inconsistent with my personal experience.



**Field with light poles**

The draft discussion concludes, “*The athletic field lighting would add new vertical elements to the project site ..... However this would not be expected to be so intrusive as to preclude the enjoyment of the natural features of the facility.*”

02

I disagree -- the height of the lighting towers dominates our whole perception of this scene. It more closely resembles a scene from War of the Worlds than pastoral parkland

The draft discusses the simulated evening view from Sutro Heights, “*Although the lights would draw attention with the intensity of the lighting, they would not dominate this panoramic view . . .*”

03





#### View of south sunset playground from the Great Highway

This fails to take into account the intense point sources of light that the sports lighting systems create. These lights stand out from miles away. This photo shows the view of the night lights at South Sunset Playground taken from about one mile away. Even at that distance the sports lights are brighter than nearby streetlamps.

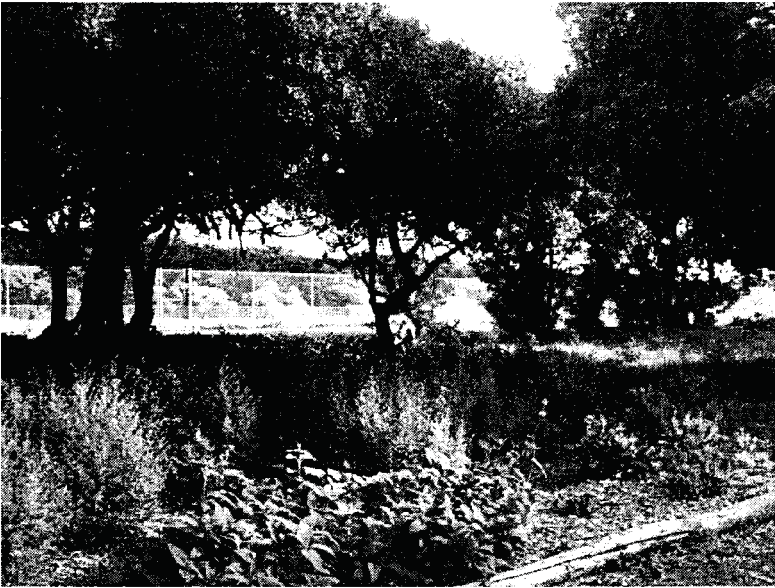
03  
cont.



A screened location on the old railroad trail was chosen for this simulation. But if you walk further down the trail, there are clear views under the trees to the fields. Surely, the light poles would intrude on our experience of the park here.

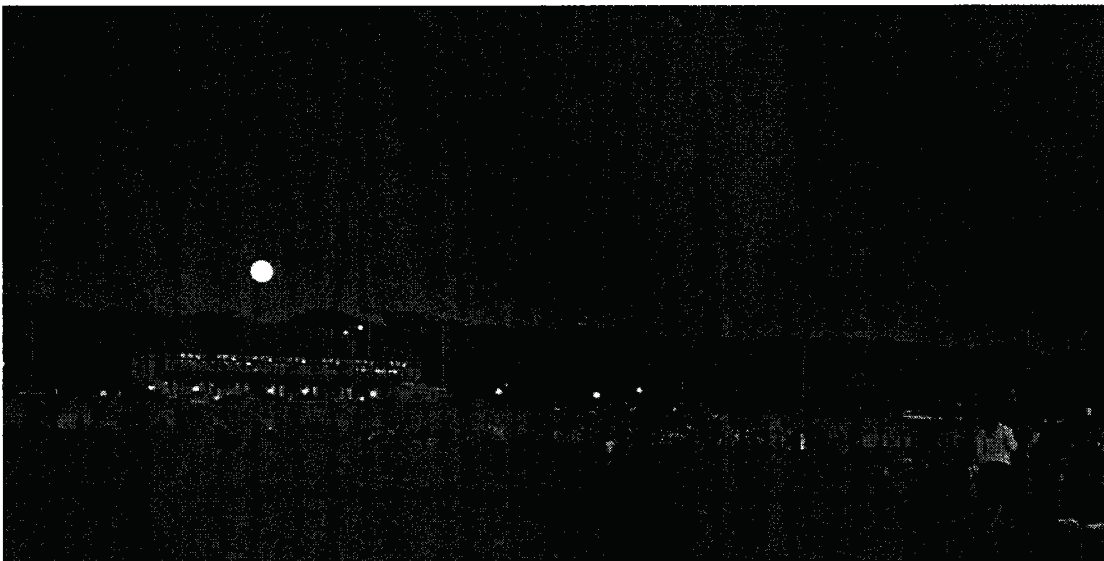
04





Finally, important views are missing completely.

The DEIR does not simulate the classic view from the Cliff House.



The DEIR has NO view from the beach towards the park -- here we see the Beach Chalet with the moon rising behind. What will this view be like with 150,000 watts of light next to it?

These are just a few of the deficiencies in the consideration of the impact that this project will have on the aesthetics of this area.

I have not had time to review the entire DEIR. I hope that you will extend the public comment period so that we can address these and other deficiencies.

05

Perhaps the compromise proposed at the hearing in conjunction with the Sunset Playground is a workable solution.

I-Hillson

06

Sincerely,

Rose Hillson  
Member, Jordan Park Improvement Association  
115 Parker Avenue  
San Francisco, CA 94118-2607



Bill Wycko/CTYPLN/SFGOV  
12/08/2011 05:23 PM

To Don Lewis/CTYPLN/SFGOV@SFGOV, Sarah B  
Jones/CTYPLN/SFGOV@SFGOV  
cc  
bcc  
Subject Fw: The Beach Chalet Field Project

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 12/08/2011 05:23 PM -----



Helen Hobbs  
<helenmhobbs@gmail.com>  
12/08/2011 05:23 PM

To bill.wycko@sfgov.org  
cc c\_olague@yahoo.com, rm@well.com,  
wordweaver21@aol.com, plangsf@gmail.com,  
mooreurban@aol.com, hs.commish@yahoo.com,  
rodney@waxmuseum.com, linda.avery@sfgov.org  
Subject The Beach Chalet Field Project

Dear Planning Commissioners,

Please approve the Beach Chalet Athletic Field Renovation Project!! It will be a healthy and needed addition to beautiful San Francisco. We lose so many young families to neighboring bay area towns, we need to keep young families in San Francisco! We need the field space, especially turfed so that the children can play in the rain. I am a 4th generation San Franciscan, and I have 4 children here. Please, please support this renovation!

Sincerely,  
Helen M. Hobbs

01





"Inge Horton"  
<ingehor@pacbell.net>  
12/01/2011 01:03 PM

To <don.lewis@sfgov.org>  
cc  
bcc

Subject Fw: Beach Chalet Soccer Fields Complex DEIR

----- Original Message -----

**From:** Inge Horton

**To:** Ron Miguel ; Christina Olague ; Michael Antonini ; Hisashi Sugaya ; Gwyneth Borden ; Linda Avery ; Rodney Fong

**Sent:** Thursday, December 01, 2011 11:07 AM

**Subject:** Beach Chalet Soccer Fields Complex DEIR

Mr. President and Commissioners:

When I drive home at night and turn from Sloat Boulevard onto 44<sup>th</sup> Avenue, my attention is always drawn to the bright and glaring lights at the soccer fields on South Sunset Playground between 40th and 41<sup>st</sup> Avenue and I am instinctively scared that there is a big fire. Actually, you can see the lights all the way from the beach. The lights proposed for the soccer fields in the western end of Golden Gate Park will have even a bigger negative effect as you expect to see a dark sylvan area and not a sports arena. Their visual impact is not adequately addressed in the DEIR (no photo montages) nor is their impact on the wildlife, especially birds, sufficiently considered.

01

The proposed project will also have impacts on the historic resources which are concentrated at the western end of Golden Gate Park, the two windmills, the Beach Chalet and the Millwright's Cottage, and their connection with each other. This is not adequately addressed in the DEIR. I am also afraid that the amount of persons attracted to the soccer games and wandering around in the area could lead to vandalism of the historic resources.

02

Having grown up in Germany with soccer being the most popular sport, I am glad soccer has won popularity in the United States. However, the location of the proposed Soccer Fields in the western End of Golden Gate Park is not a suitable location and contradicts policies of the Golden Gate Master Plan and General Plan. As alternative to the proposed project I would like to suggest a compromise: the restoration of the natural lawn of the existing soccer fields for daytime use without the introduction of artificial turf and bright night lighting in combination with upgrading the playing fields at the West Sunset Playgrounds would be an excellent solution and would not only served the soccer community but also the students of the adjacent schools.

03

Another point I would like to make is that environmental impacts of the proposed Soccer Fields project should be reviewed together with those of the proposed Recycled Water Treatment Plant which is also to be located at the western end of Golden Gate Park. The cumulative impacts of both proposed projects need to be evaluated together. Until a DEIR for the Treatment Plant is published, this DEIR for the Beach Chalet Soccer Fields should not be approved.

04

Thank you for considering my concerns.

Inge Horton

2363-44<sup>th</sup> Avenue  
San Francisco, CA 94116

Inge S. Horton  
Winner of the 2010 Milka Bliznakov Prize  
of the International Archive of Women in Architecture  
for her book  
Early Women Architects of the San Francisco Bay Area  
The Lives and Work of Fifty Professionals, 1890-1951

18 Southfield Road  
Glen Cove, NY 11542  
December 8, 2011

Mr. Bill Wycko  
Environmental Review Officer  
Beach Chalet Fields Renovation  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

**Re: Public Comment on Draft EIR**  
Beach Chalet Athletic Fields Renovation  
Planning Department Case No. 2010.0016E  
State Clearinghouse No. 2011044005

Dear Mr. Wycko,

I am writing to make you aware of some issues that I feel have not been fully addressed by the Draft Environmental Impact Report on the Beach Chalet Athletic Fields Renovation.

For your information, my professional and civic background is attached. In addition, I wish to mention that my father, Glenn W. Howard, Ph.D., served on the City of Glen Cove (NY) IDA, CDA, and Planning Board, and on the Senior Citizens Council for Nassau County, NY. When he was Chairman of the Physical Education Department at Queens College, City of New York, he coached the soccer team which played on a natural grass field and never, in all of the games that I attended with him, did they have a field related injury or an issue with the field itself from a contest standpoint.

There are three deficiencies in the DEIR that I feel need to be addressed and I did not hear mentioned in the public hearing on December 2.

1. It is noted in the DEIR that the artificial field will drain into the storm water system and not feed the aquifer in the same manner as a natural grass field. The entire field is half the width of the Golden Gate Park. By preventing rain from percolating into the soil at the West end of half of the Park, the flow of water toward the ocean will be altered for underground flow from the East. This not only alters the recharge of the upper aquifer but could prove to permit increased intrusion of salt water into that portion of the aquifer.

01

In addition, municipal codes now demand that paved over and large area structures provide for dry wells, capable of holding 2 to 4 inches of rain per total area, as recharge basins instead of having the water run into the storm sewer systems. The artificial field is in the same class as a parking lot or large building and the drainage should not be to the storm sewer but into dry wells placed at the end or sides of the field.

02



7.2 acres of synthetic fields would, for a minimum of 2 inches of rain need to contain 1.2 acre feet of water (52,271 cu ft or 391,000 gallons). At 4 inches this is nearly 800,000 gallons of runoff that is not recharged but wasted. The DEIR does not address this environmental issue.

02  
cont.

2. The issue of parking for the fields is not addressed in the proper manner relating to the new stadium recommendations. In fact this does not include any combined effect for the fields and chalet. Standard parking codes typically require 1 vehicle space for each 4 or 5 seats or expected attendees. For stadium seating of 1000, as stated in the DEIR, a maximum of 250 and a minimum of 200 parking spaces are required. The number to be created is far below that. In setting these standards it is assumed (rightly) that at some time all seats will be filled. There is no provision for assuming that far fewer will be present regardless of whether this is event parking, building parking or other.

03

While nearby parking fields or garages may be used (if permitted by the master plan or zoning code, to supplement there is usually a distance limit set also – normally 500 feet or less, due to constraints for persons need to walk. The DEIR speaks of 6 to 13 minutes which is excessive, and no immediate public transit at that end of the Park. While the DEIR speaks of using the beach parking, there is only one relatively safe access point to cross a very busy 4 lane highway (and no apparent crossing light mentioned) in the middle of the field area. This still does not provide ease of access, especially because the spaces closest to the cross walk are not reserved for the soccer fields but open to all. On a busy day the field could be filled forcing long hikes in a high traffic area to see games. See Figure 1 with cross walk marked with yellow box.

04

In addition there must be provision for handicapped spaces that are proportioned based on the number to total spaces provided and this has to be addressed.

05

The current lot has 50 spaces, well below what should be there now, and the proposed lot increases that to a total of 70 spaces, 130 to 180 less than most municipal codes require as being adequate. Such an enlargement would have a large impact on the forestation in that area and would need further study.

The DEIR also assumes that many just are drop-off cars, but in fact for a contest, this is not true. If the fields are used as expected then there will be a substantial shortage of parking even for the families of the players. Indeed, this lot also seems to be unrestricted and could be filled by Park visitors with no interest in soccer. Furthermore, there are only 6 handicapped spaces in the beach lot and only two near (but not immediately adjacent to) the central cross walk, a number well below what would be needed if this lot were to serve the soccer fields. In fact probably well below current zoning requirements.

06

There are on the proposed parking map 4 handicapped spaces. Yet in the seating plan there are 8 accessible (handicapped) seats proposed. It is rare to have more than one person per car handicapped therefore for 8 seats 8 auto spaces, in the parking area closest to the stands, reserved for the handicapped are required.

07

3. All synthetic turf fields need routine cleaning and grooming, as well as repairs. The DEIR seems to avoid any mention of the need to clean this material at a minimum of weekly using

08

special equipment. In a direct contact ocean shoreline area such as this, it may be necessary to groom more frequently if storms dump sand on the field. Playing on a fake turf field with sand in the surface structure can abrade the fibers and age the turf more rapidly than in areas where this environmental action is not present.

08  
cont.

The main issue that does not appear to be addressed, relating to wear and grooming, is what is done with the material removed from the field. This will consist of debris, turf fibers and fragments which contain heavy metals, and the sub structure ground tire material. None of this should go to a land fill or a normal disposal facility but should be treated in the same manner as would the turf and sub structure if removed for replacement.

09

4. While perhaps not required by a DEIR, the removal of old artificial turf is mentioned as being returned to the manufacturer (after 10 to 15 years of use), but there is no indication in the DEIR of how this will be handled if the manufacturer is no longer in business. Normally, to protect a municipality in construction of any facility, a performance bond is required. If the original manufacturer is not in business, the turf cannot be returned but must be disposed of by the City of San Francisco. Therefore, it would seem prudent and proper to require a disposal bond from the supplier or manufacturer to cover the cost of disposal should they not be in business. This would be held in escrow and returned at that time.

10

I wish to provide the following information to your Commission relating to natural turf fields and use and upkeep costs. Because of the issues raised in the DEIR about issues with the synthetic turf, including the unnatural color that stands out, I contacted the Glen Cove Department of Parks and Recreation for information about the local fields, which are all natural grass.

11

The first comment was, when the Golden Gate DEIR was explained, that Glen Cove has rejected synthetic turf upon careful investigation and has no intention of pursuing it. Initial cost was very high, there were serious upkeep issues including significant maintenance above and beyond normal maintenance every 3 to 4 years, and there was the issue of the ground tire dust. In addition, the main fields are used for 5 different sports, creating a serious surface lining issue. Just the initial cost for one regulation soccer field (\$700,000) far exceeded the entire Department budget.

12

On the major sports area about 4.5 acres, the City of Glen Cove fields baseball, softball, soccer, lacrosse, football and field hockey. These fields are in use 8.5 months a year. From June to Labor Day they are in use continuously from 9 a.m. to midnight seven (7) days a week. These fields (see aerial views in Figures 2 and 3) are next to Long Island Sound and lie just above the water table, just as the fields in Golden Gate Park. Drainage is very good and the fields rarely cannot be used after even a heavy rain. The fields are relined for each sports season. In addition they are fully flexible for all age groups by adjusting the field "sizes", unlike the proposal for the San Francisco soccer fields which have no adjustability shown in the design plans for children vs. adults.

Note in Figure 3 the City fields lower center, which can accommodate 8 ball fields or 2 football and 6 soccer fields, and the Middle School and High School fields (with baseball and football fields of natural grass) upper right.

↑  
12  
cont.

The Glen Cove Department of Parks and Recreation has an annual budget of about \$140,000 which covers 9 facilities including a golf course, all fields, two beaches, a boat ramp, Morgan Park and other small areas. This includes everything; labor, equipment and supplies. The cost of maintaining the main grass fields is about 30% of the total budget.

↑  
13  
↓

In view of the above DEIR shortcomings, and the far overstated difficulty in maintaining natural grass fields, I recommend that the Commission review very carefully the need for synthetic turf, or at a minimum make certain that the Final Environmental Impact Report (FEIR) is accurate, thorough, comprehensive and complete, is visitor and user friendly, and leaves no loopholes for future degradation of this area of the Park or the watershed in that area.

Respectfully submitted,



Glenn W. Howard, Jr., Ph.D.  
516-759-1640  
[vze2fn5v@verizon.net](mailto:vze2fn5v@verizon.net)

Attachments:

Figure 1 – Chalet parking  
Figure 2 – Glen Cove Field  
Figure 3 – Sports Fields Glen Cove  
Glenn Howard, Jr. - Professional and Civic Background





FIGURE 1. SF Soccer Field and Adjacent Beach Parking with Crosswalk Marked.





FIGURE 2. City of Glen Cove Main Sports Field – Ball Field Layout

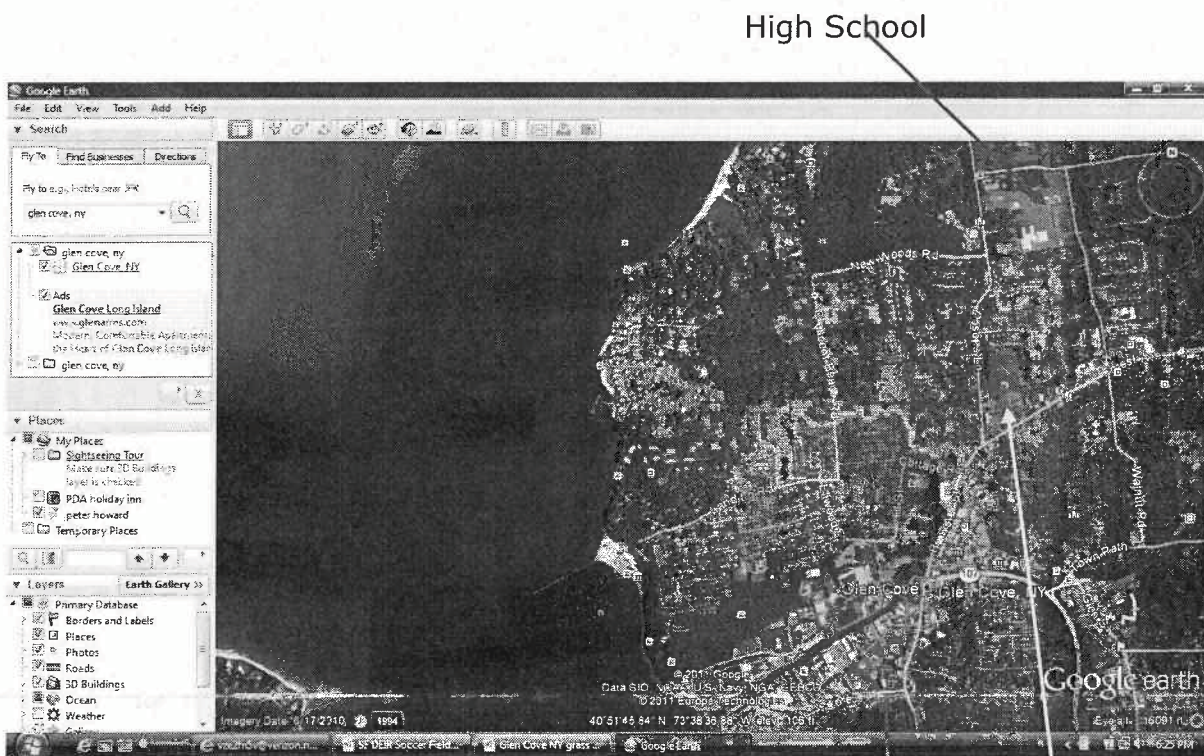


FIGURE 3. Glen Cove Area Sports Fields

High School  
City Field Middle School

Glenn W. Howard, Jr., Ph.D.  
18 Southfield Road  
Glen Cove, NY 11542  
516-759-1640  
[ghconsultants@verizon.net](mailto:ghconsultants@verizon.net)

Summary:

Corporate consultant for Pall Corporation for filtration relating to biological and microbiological applications, including pharmaceutical, food and beverage, electronics and aerospace.

Global product occurrence consultant Pall Life Sciences. Upgraded diagnostics, interpretation and resolution of product occurrences resulting in overall improvement and timely closeout of product issues. Provided training in product occurrence evaluation to manufacturing, technical support, and quality personnel.

Globally supported, and provided training to, Technical Services and Validation personnel, Sales, Marketing, Distributors, and Customers enhancing their ability to understand and use Pall products.

Manufacturing Review Board and Biopharmaceutical QARA document and publication review.

Direct participation in new product development with R&D relating to testing and product introduction. Provided technical product support to Distributors and Customers. Document and test protocol preparation and review. Presentation of technical papers and training sessions at regulatory, professional groups including the FDA, Parenteral Drug Association and Stat-A-Matrix. Served on HIMA and ASTM filtration standards committees.

Experience:

Pall Corporation  
25 Harbor Park Drive North  
Port Washington, NY 11050

Principal Scientist - 2001 to 2009

Corporate Consultant for Pall Life Sciences (Biopharmaceuticals and Biomedical) and Pall Industrial (e.g., Aerospace, Food and Beverage, Process Chemicals). Provided technical support and training to technical specialists, laboratory personnel, customers, distributors, sales and marketing for filtration applications and issues world wide. Reviewed and advised on technical issues on all corporate Life Science documents being processed for publication (internal and external). Served on global technical committees on new product development and release, product specifications, and critical issue resolution. Reviewed and approved, and helped write pharmaceutical products claims and specification documents, and internal product release and validation documents. Member of Manufacturing Review Board. Provided corporate position documents and technical response letters to customers on sensitive critical issues.



Associate Director - Scientific and Laboratory Services Department – 1983 to 2001

Managed and trained Staff Scientists and related laboratories (Microscopy and Microbiology) to support biopharmaceutical, food and beverage, and aerospace applications. Developed and reviewed critical test procedures and protocols. Oversaw special projects relating to product validation and field support, as well as R&D development and implementation of products. Interacted with pharmaceutical companies, and standards and government agencies on filter validations and testing. Provided technical training and support to customers, distributors, Marketing and Sales worldwide. Authored papers, both internal and external, on product use and performance. Prepared and presented papers, posters, and training for various trade shows, continuing education groups, regulatory agencies, and customers. Developed formal customer product specific validation program, and provided continuous support for all aspects including: bacterial challenge tests, compatibility, extractables determinations, and integrity test parameters. Involved in customer support directly and indirectly for product implementation, product returns (including full forensic investigations), and product performance.

Manager Biological Controls – 1976 to 1983

Managed Microbiology Laboratory supporting R&D, product development, customer service, acted as Staff Scientist to support customers for product implementation, product returns, and product performance. Served on ASTM committees for filtration (chaired F-21 subcommittee). Prepared, published, and presented papers at trade shows, customers and the FDA.

Environment 2000 Ltd - 1973 to 1976  
Denison, IA

Small start-up company providing limited set of chemical and biological products for environmental control to farm community. Served as R&D Director, and Technical Products Manager. Development and testing of products, field testing and customer support, packaging, labeling, EPA registration, acquisition of raw materials.

Adelphi University – 1970 to 1973  
Garden City, NY

Assistant Professor Microbiology.  
Taught Microbiology courses with labs, seminar courses in Molecular Biology, and sponsored a successful Masters Degree Candidate.

Education

Purdue University, Lafayette, IN  
Ph.D. - Molecular Biology 1970  
M.S. - Molecular Biology 1969

Rice University, Houston, TX  
BA – Biology 1962

Supplementary Experience

City of Glen Cove, Planning Board – 1986 to 1989

Glen Cove Chamber of Commerce

Board of Directors – 1987 to present

Treasurer – 2003 to 2006

2<sup>nd</sup> Vice President 2008, 2009.

First Vice President 2009-present

Chair Government Liaison Committee – 2002 to present

Co-Chair Nominating Committee – 2007 to 2010

Co-Chair Office IT and Web Site committee – 2008 to present

Chair Scholarship Committee – 2006 to present

Rotary Club of Glen Cove 1976 to present

President – 1986, 2002, 2004

Vice President - 1985

Member – Board of Directors, 1984 to 1989 and 2005 to present

Secretary – 2009-present

Glen Cove School District

Diversity Committee Member - 2001 to present.

December 11, 2011

Mr. Bill Wycko  
Environmental Review Officer  
Beach Chalet Athletic Fields Renovation  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

[Sent by email to: [bill.wycko@sfgov.org](mailto:bill.wycko@sfgov.org)]  
[Copy to: [don.lewis@sfgov.org](mailto:don.lewis@sfgov.org)]

RE: Public Comment on Draft EIR  
Beach Chalet Athletic Fields Renovation  
Planning Department Case No. 20100016E  
State Clearinghouse No. 2011044005

Dear Mr. Wycko:

Please include these comments on the Beach Chalet Athletic Field Renovation project's public comment files, electronic and hard copy (physical), for review by the Planning Department's staff and the Planning Commission.

Authorship and Authority:

The material herein was prepared and presented by Gordon E. Howard, Ph.D., Emeritus Professor of Parks, Recreation and Tourism Management, Clemson University, Clemson, SC.

The comments should not be attributed to Clemson University, its employees, affiliates or students.

Contact information: [ghoward@aaahawk.com](mailto:ghoward@aaahawk.com)

**DEIR ISSUES AND INADEQUACIES**

1. Earthquake and related earth surface events.

A. Tsunami

**Impact HY-6** states that the soccer fields are not in an area subject to tsunami run-up.

It refers to Map 6 General Plan Community Safety Element. The Map 6 is dated 1972.

The determination was made that the impact was less than significant.

This determination was made prior to the March 11, 2011 tsunami which devastated parts of Japan and produced damage along the Pacific Coast of the United States.

The City and County of San Francisco Emergency Response Plan, Tsunami Response Annex (March, 2011) map ("Attachment B") clearly shows that the project area is within the tsunami run-up zone. "Attachment B" is based on 21<sup>st</sup> century modeling.

01

Additionally, the Annex presents this:  
 "Evacuation Priorities

First Priority is to clear people from:

...  
 Soccer fields near beach in Golden Gate Park (SFPD and PRD [sic])  
 ..."

**>Clearly, this is an area that needs further work. When their tsunami walls were overtopped, the Japanese learned that the old predictions were not accurate for the new realities of global geologic processes. The EIR should reflect the projected impact from the most recent data and models, not 40 year old models.**

**>The predicted rise in ocean surface levels will exacerbate the potential for tsunami run-up at the project site. This has not been addressed.**

I am surprised that such a development would be placed in a location with a potential for sudden catastrophic destruction when other, safer locations are available or possible. .

#### B. Earthquakes

The project site is in an area described as having the **potential** for liquefaction. (Map - 4) in the General Plan Community Safety Element.

The DEIR lists this risk as "Less than significant impact."

Human manipulation of the land is known to increase the risk of / severity of liquefaction.

**>The DEIR fails to address the impact that the alteration of the surface will have on the liquefaction potential at the soccer field site.**

Maps 2 and 3 (Created in 1995), presented in the General Plan Community Safety Element, deal with the potential for "shaking" from earthquakes. These two maps show that the project is in the "non-structural" zone or Modified Mercalli Intensity Damage Level of VII ( 7.1 earthquake).

**>The DEIR does not address the impact that an earthquake would have on the top-heavy light poles. Rather it passes that off to another agency.**

**>Specific earthquake hardening design criteria for sports field or other similarly high light poles (standards) should be presented or at the very least cited, just as other standards are presented in the DEIR.**

Should the light poles fall, they would damage the surface of the fields, compromising the drainage system and other barriers designed to protect the surrounding environment from the materials in the field.

Additionally, the destruction, in whole or in part, of the surface of the fields would trigger the need to remove some or all of the material for recycling.

Other causes, such as vandalism, may require portions of the surface to removed and replaced

01  
cont.

02

**>This contingency has not been addressed, but needs to be. See Recycling, below.**

02  
cont.

## 2. Recycling

The DEIR states that at the end of its useful life all of the synthetic material will be recycled by the manufacturer or its designee [IV.H-30].

The manufacturer would be given **7 years** from contract ratification to develop and submit a recycling plan. [ROFL] . ("A *signed commitment guaranteeing implementation of the plan within 7 years of contract ratification.*")

While DEIR states that the product life is between 12 and 15 years, there are no warranties that approach 12 years.

The typical warranty expires between 5 and 8 years, which might explain the 7 year span to develop a recycling plan.

**>The DEIR does not address the process for dealing with material removed prior to the end of the 7 years allowed the manufacturer to develop a recycling plan.**

03

**>The DEIR does not address situations in which the manufacturer is no longer in business either through litigation, bankruptcy, or restructuring.** (Ask people who used to have a guaranteed pension and health benefits about the joys of a business restructuring).

**>Accompanying each bid for this project, the merchant / contractor should provide a workable plan for recycling the material provided. Additionally, it should provide a performance bond at the time the bid is submitted. .**

**>There is no analysis of the legality of transporting hazardous waste or/and non-hazardous waste across governmental jurisdictions: municipality, county, or state. This analysis needs to be completed prior to any approval of this project if the project contains an assurance of that the synthetic turf and infill will be recycled.**

## 3. Exposure to hazardous metals

### A. Participant Exposure

Much is made about the level of exposure to hazardous materials by participants being below the daily limits set by health agencies.

Two study groups [IV.H-10] recommended purchasing synthetic turf that is not made with lead or does not have lead in its infill.

However, Table IV.G-4 clearly shows standards that allow for lead, zinc and chromium. By the absence of a statement to the contrary it must be assumed that SFRPD will purchase synthetic turf containing lead, zinc and chromium, along with other metals.

Samples tested, with the data presented, repeatedly use the phrase "equal or less" than a criterion level for exposures to these hazardous metals.

04



**>There is a misrepresentation that the health of a child exposed to an “equal to or less” than a specific criterion level for daily exposure at soccer is not compromised. This assumes that the soccer field is the only exposure to those metals or other hazardous matter. Most assuredly, it is not. The DEIR fails to address the additive impact of exposure to these metals in the participants.**

04  
cont.

**>Crumb rubber dust and particulate matter often attaches to the shoes and other clothing of the participant. In that manner it spreads to others, vehicles, the home, etc. where it can be inhaled or ingested. This extends the exposure time of the participant beyond the practice or the competition. The DEIR fails to discuss the impact on this cross-contamination of non-participants and their environments, and particularly family (group) members who have existing health problems which would be exacerbated by those metals.**

#### B. Leachate

Leach tests generally use purified water, though some testing is done using a range of pHs.

I have not found a test which uses salt water. None of the field studies conducted on artificial turf cited in the DEIR used salt water or were in salt water impacted areas.

05

The Beach Chalet soccer fields are subject to salt spray, vapors and condensate.

**>The impact of salt in the leach water on the release of the metals and other components of an artificial turf field should be investigated. .**

#### 4. Play Time

Table II-2 presents the “Maximum Annual Play” in hours for the “Existing Facility” (4,738 hours per year) and the “Proposed Project” (14,302 hours per year).

Notwithstanding that the Existing Facility is closed each Monday (See Table II-1) and one of the 4 fields is “resting” (not used) the hours are rigged in favor of the Project. While the Project hours of operation are listed as “Year-round: 8:00 a.m. or 9:00 a.m. to 10:00 p.m.”, the Existing facility is shown as being closed at 6:30 p.m. on Saturdays and 5:00 p.m. on Sundays.

**>Play hours should be comparably presented using the same time periods.**

06

**>The data and methods used to calculate the hours available for play should be presented in the EIR as the “extra” play time over that of the Existing fields is the primary reason given for the Project.**

It is illogical to expect that the Project fields will always be available for play or playable at the times indicated. There is no data presented on the number of play periods which were cancelled due fog, thunderstorms or high winds in an average year.

**>Without weather related data, it is not possible to compare the available playing times in real world terms. These data should have been presented in the DEIR.**

An example of the **real world** can be found in Table II-1. Note that between 9:00 a.m. and 3:30 p.m., Tuesday through Friday, there were no requests to use the Existing fields. Remember that those fields are closed on Mondays.

## 5.. Park Heritage

The concept of a sports complex in Golden Gate Park is anathema to me. It is in the wrong park at the wrong place being at once furthest removed from the client base, relative to the park, and adjacent to a sensitive wildlife area, notwithstanding the Great Highway..

The DEIR contains a section (V.B) which is titled: Significant Environmental Effects that Cannot be Avoided if the Proposed Project is Implemented.

That title, alone, should have been sufficient to kill the project.

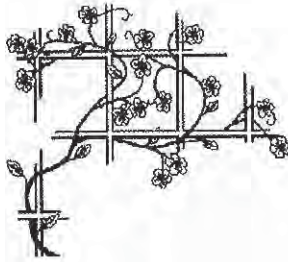
>There is a false premise in the project goals that only an athletic complex at the west end of the park can provide other amenities such as paths, bike racks, or increasing visitation to the area. Additional amenities can be provided if the Recreation and Parks Department decides to do so. It has already identified the need. Similarly, creative minds can find ways to bring more people to the area as it is now, without creating a sports complex.

>Alternative 2: Off-Site Alternative is poorly presented without any consideration for potential economic benefits to neighborhoods where development is needed.

>The biggest positive derived from Alternative 2 is that the unique Golden Gate Park will not be sacrificed for organized athletics. San Francisco has many athletic facilities. It has only one Golden Gate Park. The impact of the conversion of the Park to an Athletic Mecca is not fully evaluated.

>In Golden Gate Park, the only coastal area is at its west end. Notwithstanding that someone decided to create soccer fields at that location years ago, there is no need to build on that mistake nor to perpetuate the current use. The impact of the loss of the coastal area to an athletic complex has not been adequately explored or presented in the DEIR.

END



**Katherine Howard**

LANDSCAPE ARCHITECT  
Ca. Lic. # 4279

1243 42nd Avenue  
San Francisco, Ca 94122  
(415) 710-2402

December 11, 2011

Mr. Bill Wycko  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission St. Room 400  
San Francisco, CA 94103

Re: COMMENT ON BIOLOGICAL RESOURCES  
Public Comment on the Draft Environmental Impact Report (DEIR)  
Beach Chalet Athletic Fields Renovation  
Planning Department Case No. 2010.0016E  
State Clearinghouse No. 2011044005

Dear Mr. Wycko,

The DEIR is incomplete and/or inaccurate in the following categories. These should be corrected in the Final EIR in order to accurately assess the impact of this project on Golden Gate Park.

- A. **Impact of wind and fog:** The DEIR states, "*An Initial Study (IS) was also distributed for review, describing the proposed project and identifying potential environmental effects of the project (see Appendix A). The IS identified impact topics that were determined not to apply to the proposed project and impact topics where the project would have no impact or a less-than-significant impact. These topics, summarized below, are not addressed in this EIR (see Section I.C, Organization of the Draft EIR, for a summary of environmental topics addressed in this EIR):*"

*"Wind and Shadow—alteration of wind or creation of shadows that substantially affect public areas."*<sup>1</sup>

**The constant wind off of the Pacific Ocean and the often accompanying fog are both defining features of the western end of Golden Gate Park and should be included in all categories of the DEIR analysis.**

<sup>1</sup> Beach Chalet Athletic Fields, DEIR, p. I-2 [DEIR]



B. **Impact on tree preservation:** The DEIR states: "*Impact BI-3: The proposed project could potentially conflict with applicable local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. (Less than Significant with Mitigation).*"<sup>2</sup> However, the project impacts are significant and the proposed mitigations are inadequate as follows.

1. **Myoporum are trees:** The DEIR is based on the project proponent's "*Tree and Large Shrub Report*"<sup>3</sup>. The "*Tree and Large Shrub Report*" [Tree Report] states that *Myoporum laetum* are "tall shrubs" and not trees. However, in his "Arborist Memorandum," Consulting Arborist Roy Leggitt III<sup>4</sup> reviews the Tree Report and states:

- "Characterization of Trees and Shrubs: *Myoporum laetum* is a tree species. Trees are either single stemmed or multi-stemmed. Woody plants of 20 to 30 feet tall are certainly trees, and are recognized as such under the Article 16 of the DPW code definition of Significant Trees."<sup>5</sup>
- See **Figure 1** for a photo of a few of these *Myoporum*.

**On what technical criteria does the "*Tree and Large Shrub Report*" base its conclusions that the *Myoporum laetum*, often 20 to 30 feet tall, in the project area are shrubs instead of trees? The DEIR must state the source documents and the independent experts that support this designation.**

2. **Impact on Windbreak:** *Myoporum laetum* are part of the windbreak that protects the western end of Golden Gate Park.

- Leggitt states: "The *Myoporum* perform a critical function at the extreme west end of Golden Gate Park. This species is one of only a few that can survive in the prevailing winds off the Ocean that are moist and salt-laden. The removal of the *Myoporum* will cause foliar salt to kill trees within the park that are currently protected. The 1980 study of GGP identified the significance of the *Myoporum*, and their function and importance to the park has not changed since that time. With the removal of the *Myoporum*, the very wellbeing and utility of GGP is threatened."<sup>6</sup>
- Leggitt further quotes the importance of the western windbreak as documented in the "*Golden Gate Park Forest Management Plan*"<sup>7</sup>.

<sup>2</sup> DEIR, p. IV.F-23

<sup>3</sup> City Fields Foundation, "Tree and Large Shrub Report," March 31, 2010.

<sup>4</sup> Leggitt III, Roy C. C.V. (Appendix B - attached).

<sup>5</sup> Leggitt III, Roy C. "Arborist Memorandum," 4/19/10. page 1 (Appendix A - attached)

<sup>6</sup> Leggitt III, Roy C. "Arborist Memorandum," 4/19/10. page 1 (Appendix A - attached).

<sup>7</sup> Golden Gate Park Forest Management Plan, State of California Department of Forestry, 1980. pp 53, 54.



- *"Three major observations have been documented by this study. First, wind is the controlling factor in tree survival in this area. Second, under these conditions, certain species perform better than others. Finally, the better the initial condition of a tree, the higher its chances of survival.*
- *"The effect of wind was extremely pronounced, where proximity to the ocean results in heavily salt-laden winds. Highly exposed trees were covered with a visible salty residue. This combination of salt and wind was so detrimental, that wind protection was found to be imperative for tree survival. This protection is required in a continuous, more or less solid form running along the western edge, rather than individual tree protection...the protection provided from a continuous "wall" of brush...was successful.*
- *"Some form of wind-protection must be provided for the trees...can be provided by wind and salt-resistant shrubs."*
- *Leggitt concludes: "... a diagram for windbreak design specifies Myoporum laetum to be planted as the front line defense, even before fencing. The City successfully installed this windbreak , and it has served us well for about 30 years."*<sup>8</sup>

- The proposed project will remove 16 "trees", 43 Myoporum, and one Pittosporum .<sup>9</sup> **What will be the impact on the windbreak of the removal of these trees and "tall shrubs?" Where will the replacement trees be planted to maintain the windbreak? What will be the species and size of these trees? Will they be resistant to salt air? How many years will pass before they are of a size to adequately function as a windbreak?**

3. **Cumulative impacts with Westside Water Treatment Plant:** The DEIR states, *"Impact C-BI: The proposed project in combination with past, present, and reasonably foreseeable future projects in the site vicinity, would not have a cumulatively considerable impact on biological resources. (Less than Significant)"*<sup>10</sup> The Westside Water Treatment Plant project will remove or have an impact on over 200 trees in the area adjacent to the Beach Chalet Athletic Fields project.<sup>11</sup> **(Figure 2).**

**What will be the cumulative impact of the tree removal occasioned by these two projects on a) the character of the western end of Golden Gate Park as a landscape park 2) the overall efficacy of the windbreak for the remainder of the**

<sup>8</sup> Leggitt III, Roy C. "Arborist Memorandum," 4/19/10. page 2 (Appendix A - attached).

<sup>9</sup> DEIR, page IV.F-32, Table IV.F-3

<sup>10</sup> DEIR, page IV.F-34

<sup>11</sup> "San Francisco Westside Recycled Water Project, Tree and Large Shrub Assessment Report," ESA, SFPUC, December 2010.



park in general and the trees immediately on the eastern side of these trees in particular? 3) vegetative screening of these facilities from the roads? (Figure 4) 4) vegetative screening between the two projects?

04  
cont.

4. **Tree protection measures are inadequate:** The DEIR states, "*Improvement Measure I-BI-3: . . . the following measures could be implemented to provide protection for trees and shrubs to be retained onsite during construction activities for the Beach Chalet Athletic Fields Renovation Project.*"<sup>12</sup>

- "Establish a Tree Protection Zone (TPZ) around any tree or group of trees to be retained. The formula typically used is defined as 1.5 times the radius of the dripline or 5 feet from the edge of any grading, whichever is greater. The TPZ may be adjusted on a case-by-case basis after consultation with a Certified Arborist."
- "Prohibit construction-related activities, including grading, trenching, construction, demolition, or other work within the TPZ. No heavy equipment or machinery should be operated within the TPZ. No construction materials, equipment, machinery, or other supplies should be stored within a TPZ. No wires or signs should be attached to any tree. Any modifications should be approved and monitored by a Certified Arborist."

05

These regulations may be appropriate on a large site, where the trees are a safe distance from the construction; however, many of the largest trees at Beach Chalet are at the edge of the construction and are even labeled in the Tree Report as being at the edge of the grading. (Figure 4) Construction is not a neat and tidy business that takes place only within the boundaries of a line on a plan. Due to the location of the trees, the size of the trees, and their location next to an irrigated area that will attract tree roots, and the fact that grading will take place near the trees, it is probable that the project will have a major impact on the trees roots for these primary boundary trees.

**The DEIR must take into account the close location of the project next to all trees, the extensive use of heavy construction equipment, and the probable location of the tree roots within the current field and surrounding grass areas, and more accurately describe the possible damage to each tree individually and the proposed mitigations for either the loss of or the damage to each tree.**

5. **Removal of non-native species is not justified:** Both the DEIR for this project and the plans for the Westside Water Treatment Plant<sup>13</sup> propose removing *Myoporum laetum*, because they are not a native species or are considered an invasive species. Invasive species have value as tough plants that can survive in areas such as the coastal area. This area of the park is not designated as part of the Natural Areas

06

<sup>12</sup> DEIR, page IV.F-33

<sup>13</sup> "San Francisco Westside Recycled Water Project, Tree and Large Shrub Assessment Report," ESA, SFPUC, December 2010.

Program. **Why are hundreds of trees being removed from this area for other than construction reasons?**

6. **Tree replacement/mitigation measures inadequate:** The Draft EIR states, *"Mitigation Measure M-BI-3: Plant Replacement Trees. The SFRPD shall replace the trees removed within SFRPD - managed lands with trees of equivalent ecological value (i.e., similar species) to the trees removed. If trees of equivalent ecological value are not feasible or available, removed trees shall be replaced at a ratio of 1 inch for 1 inch of the diameter at breast height of the removed tree."*<sup>14</sup>
- The location of the replacement trees is not stated. SFRPD manages thousands of acres in San Francisco as well as Sharp Park and Camp Mather. **Where will the replacement trees be planted? How can planting in another park mitigate the damage to Golden Gate Park's habitat, windbreak, or the landscape character of Golden Gate Park? The Final EIR must show the location for the planting of the replacement trees and the impact on the windbreak.**
  - The DEIR defines equivalent value as "similar species." **What is the definition of "similar species"? Why is only ecological value a criteria for replacement?**
  - The names of the replacement species are not listed in the DEIR. It has taken many years and trial and error for different species of plants for Golden Gate Park's landscape to be established in what was originally sand dunes with few trees. Furthermore, some species will take much longer to grow in to replace the current trees and "tall shrubs." **To know how both the character and the habitat of the park will be impacted, the EIR needs to list the species that will be used as replacements.**
  - All replacement trees should also support and enhance Golden Gate Park's design as a landscape park. **The DEIR must list not only the replacement trees and their locations, but also how they would support and enhance Golden Gate Park's design as a landscape park.**
  - A "similar species" that is only 4 feet tall and 1 inch in diameter does not have the ecological value of a mature tree. **The DEIR must quantify the loss in ecological value of removing so many mature trees.**
  - The use of the word "feasible" is a typical development term for "We aren't really going to do this." **The DEIR should explain what actions the City shall commit to performing. The word feasible should be taken out of the report.**
  - The use of the term "available" is also subject to scrutiny. This project is planned to take place over a few years; replacement trees can be contract-grown to meet the projected needs. This process can be started at any time; surely the trees that would be attractive for this location could be used in other park locations if this project is not completed as the DEIR envisions it. **The DEIR should list the**

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<sup>14</sup> DEIR page IV.F-33



proposed replacement trees and their current availability as well as plans for contract growing them if they are not currently available.

- Why are certain trees replaced at the ratio of 1 inch to 1 inch diameter and others are not? All trees removed should be replaced at the ratio of 1 inch for 1 inch of the diameter at breast height. A tree with a diameter of 1" cannot replace either aesthetically or ecologically a Monterey Cypress that is 48" in diameter. **The DEIR must justify this mitigation measure.**
- The replacement policy refers only to "trees." The report erroneously classifies the Myoporum as shrubs. If this classification is used for the replacement policy, then there will be limited vegetation replacement. According to our calculations, based on the diameters of trees to be removed as listed in the "Tree Report," a total of 831 inches of "tall shrubs" and 250 inches of "trees" in diameter will be lost. The loss of this amount of mature vegetation has an impact not only visually but also in terms of habitat and other ecological values.

**The DEIR should list all trees and "tall shrubs" to be removed and give the total amount of diameter of trees and "tall shrubs" that will be lost.**

**The Final EIR needs to change this policy to replacing all trees and large shrubs at the ratio of inch for each one inch of diameter lost.**

**The Final EIR needs to show where these new trees will be planted, including the species, the size (for example, 15 gallon, 24" box), the location and the committed maintenance budget and watering plans for these new trees. The latter are especially important, since one of the reasons given for the project in public meetings by the project proponents has been the lack of staffing at the Recreation and Park Department.**

7. **In another section of the DEIR**, it states, "In addition, the proposed project includes replacement of each tree removed at a one-to-one or greater ratio."<sup>15</sup> Replacing a mature tree with a small tree is not an equivalent replacement. **Replacements should be an equal number of trees to replicate the diameter of trees lost and to quickly replace the windbreak and fog drip characteristics of the trees being cut down.**
8. **Relationship of the reforestation program to the project is missing:** The DEIR does not explain the current reforestation program for the western end of Golden Gate Park and how the loss of trees and replanting of new trees will fit into that plan.

***All replacement trees planted as mitigation must be in addition to trees already planned for as part of any reforestation efforts. The project should not substitute mitigation plans for reforestation efforts that are needed to maintain the forest and western windbreak of the Park.***

<sup>15</sup> DEIR, page IV.F-24

9. **Potential for native plants in the area not accurate:** The DEIR states that " . . .the overall potential of the site to support special -status plant species is considered low based on the lack of native plants and native plant habitats, and on the disturbed and heavily managed condition of the area." (DEIR p. IV.F-8) This sentence makes the area sound like a former strip mine or other environmentally devastated area. In fact, the western end of Golden Gate Park has supported a variety of vegetation and, before the park was established, did have a selection of native plants growing on the dunes. Today, there is a native plant restoration area immediately adjacent to the Beach Chalet Athletic Fields. If those plants can survive, then it is possible that other native plants could exist or will come in to the area, given the opportunity.

**The EIR needs to be corrected to include this local native plant area and the potential for native plants to grow in and around the site, as do now.**

09

Thank you for your attention to these questions. Please mail to me the printed copies of the Comments and Responses and the Final EIR.

Katherine Howard, ASLA  
1243 42<sup>nd</sup> Avenue  
San Francisco, CA 94122



+++++

**FIGURES**



Figure 1 -

Border of trees and "tall shrubs" (*Myoporum Laetum*) along the western edge of the Beach Chalet Athletic Fields



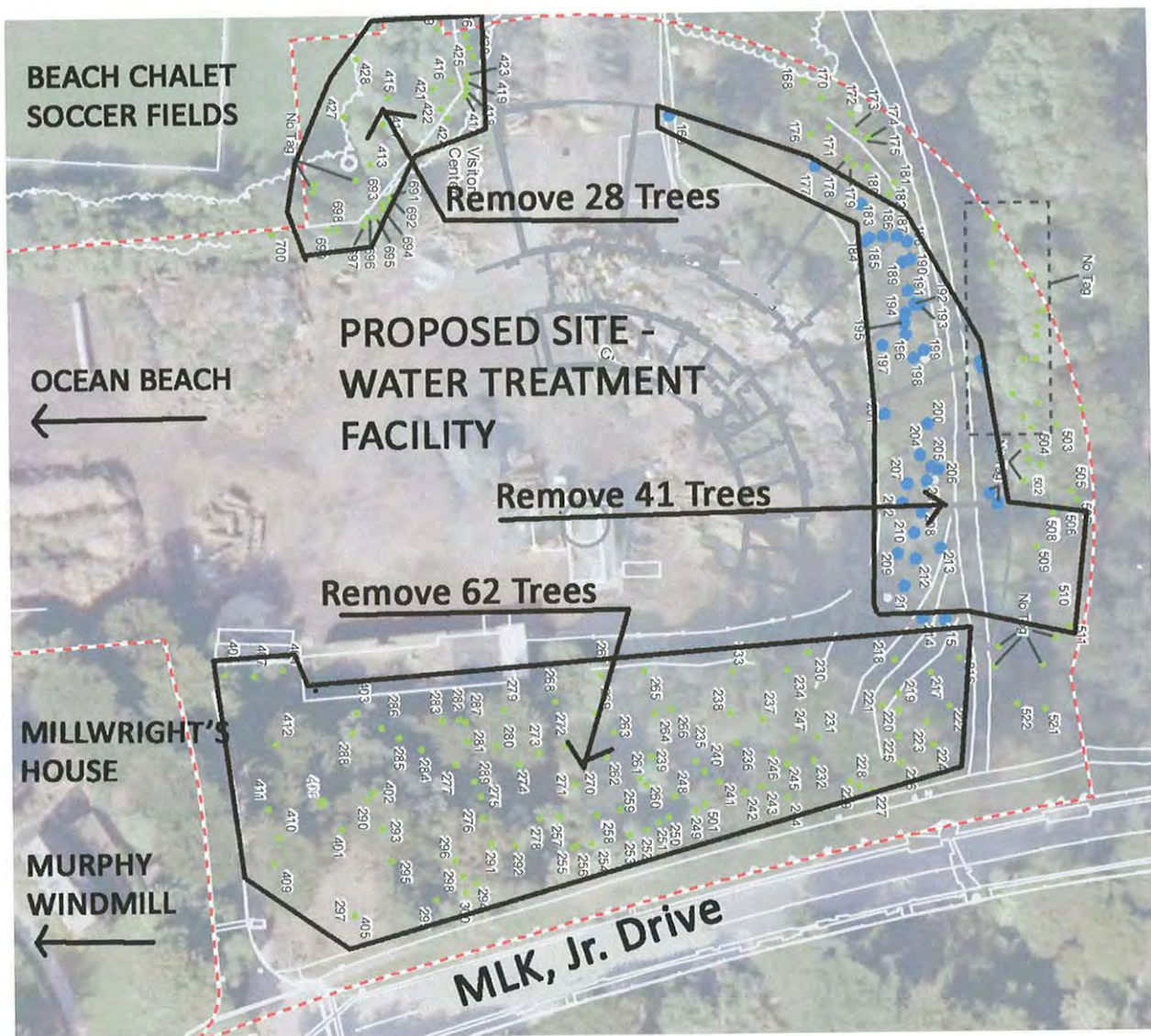


Figure 2 -

"San Francisco Westside Recycled Water Project, Tree and Large Shrub Assessment Report,"  
 ESA, SFPUC, December 2010. (Number of trees added by author, based on the report.)





Figure 3

Screening "tall shrubs" at Westside Water Treatment Plant Site. Most of these trees will be removed by the project. In addition, the WWTP is a Homeland Security site, with specific requirement for security and visibility that are not compatible with vegetated parkland.

10





Figure 4

Monterey Cypress at south-western edge of the current playing field.

What will be the impact of the construction on the root system of this tree? How many branches will be lost to the construction? If this tree is removed, what species and size of tree(s) will replace it?

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## APPENDIX A: ARBORIST MEMORANDUM - PAGE 1

**SF Ocean Edge****Attn: Katherine Howard****c/o 1243 42<sup>nd</sup> Avenue****San Francisco, CA 94122****Project: Soccer Fields  
Golden Gate Park, Western End****Date: 4/19/10****ARBORIST MEMORANDUM****Findings****Flawed Tree Study***Exemption from Environmental Review, page 8*

HortScience *Tree and Large Shrub Report* assignment: assess tree hazard potential under new uses. This is not a measure of existing conditions nor is it an assessment of existing value and function. The assignment from R&P was slanted to meet the criteria for an approved project, not toward an objective study. The R&P Commission has cited this aspect of the study in the Exemption of Environmental Review, and this part of the study is flawed.

12

**Characterization of Trees and Shrubs**

*Myoporum laetum* is a tree species. Trees are either single stemmed or multi-stemmed. Woody plants of 20 to 30 feet tall are certainly trees, and are recognized as such under the Article 16 of DPW code definition of Significant Trees.

Flat-topped Monterey Cypress are normal for an area of prevailing winds. This is not a defect, but rather is adaptive and is an advantage. These trees are crucial in their function as a windbreak.

13

**Myoporum Windbreak**

The *Myoporum* perform a critical function at the extreme west end of Golden Gate Park. This species is one of only a few that can survive in the prevailing winds off the Ocean that are moist and salt-laden. The removal of the *Myoporum* will cause foliar salt to kill trees within the park that are currently protected. The 1980 study of GGP identified the significance of the *Myoporum*, and their function and importance to the park has not changed since that time. With the removal of the *Myoporum*, the very wellbeing and utility of GGP is threatened.

APPENDIX A: ARBORIST MEMORANDUM - PAGE 2



Golden Gate Park Forest Management Plan, State of California Department of Forestry, 1980 relates the importance of the western windbreak on pages 53 and 54:

"Three major observations have been documented by this study. First, wind is the controlling factor in tree survival in this area. Second, under these conditions, certain species perform better than others. Finally, the better the initial condition of a tree, the higher its chances of survival.

The effect of wind was extremely pronounced, where proximity to the ocean results in heavily salt-laden winds. Highly exposed trees were covered with a visible salty residue. This combination of salt and wind was so detrimental, that wind protection was found to be imperative for tree survival. This protection is required in a continuous, more or less solid form running along the western edge, rather than individual tree protection...the protection provided from a continuous "wall" of brush...was successful.

Some form of wind-protection must be provided for the trees...can be provided by wind and salt-resistant shrubs."

On page 57 of this report, a diagram for windbreak design specifies *Myoporum laetum* to be planted as the **front line defense**, even before fencing. The City successfully installed this windbreak, and it has served us well for about 30 years.

13  
cont.

#### **Root Losses From Trenching**

Impacts to tree roots from trenching for underground utilities have been omitted. Trees could be lost due to root losses that cause trees to become unsafe or fall over.

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## APPENDIX A: ARBORIST MEMORANDUM - PAGE 3

**Assumptions and Limiting Conditions**

1. Any legal description provided to the consultant is assumed to be correct. Title and ownership of all property considered are assumed to be good and marketable. No responsibility is assumed for matters legal in character. Any and all property is appraised or evaluated as though free and clear, under responsible ownership and competent management.
2. It is assumed that any property is not in violation of any applicable codes, ordinances, statutes or other governmental regulations.
3. Care has been taken to obtain all information from reliable sources. All data has been verified insofar as possible. The consultant can neither guarantee nor be responsible for the accuracy of information provided by others.
4. Various diagrams, sketches and photographs in this report are intended as visual aids and are not to scale, unless specifically stated as such on the drawing. These communication tools in no way substitute for nor should be construed as surveys, architectural or engineering drawings.
5. Loss or alteration of any part of this report invalidates the entire report.
6. Possession of this report or a copy thereof does not imply right of publication or use for any purpose by any other than the person to whom it is addressed, without the prior written or verbal consent of the consultant.
7. This report is confidential and to be distributed only to the individual or entity to whom it is addressed. Any or all of the contents of this report may be conveyed to another party only with the express prior written or verbal consent of the consultant. Such limitations apply to the original report, a copy, facsimile, scanned image or digital version thereof.
8. This report represents the opinion of the consultant. In no way is the consultant's fee contingent upon a stipulated result, the occurrence of a subsequent event, nor upon any finding to be reported.
9. The consultant shall not be required to give testimony or to attend court by reason of this report unless subsequent contractual arrangements are made, including payment of an additional fee for such services as described in the fee schedule, an agreement or a contract.
10. Information contained in this report reflects observations made only to those items described and only reflects the condition of those items at the time of the site visit. Furthermore, the inspection is limited to visual examination of items and elements at the site, unless expressly stated otherwise. There is no expressed or implied warranty or guarantee that problems or deficiencies of the plants or property inspected may not arise in the future.

**Disclosure Statement**

Arborists are tree specialists who use their education, knowledge, training, and experience to examine trees, recommend measures to enhance the beauty and health of trees, and attempt to reduce the risk of living near trees. Clients may choose to accept or disregard the recommendations of the arborist, or to seek additional advice.

Arborists cannot detect every condition that could possibly lead to the structural failure of a tree. Trees are living organisms that fail in ways we do not fully understand. Conditions are often hidden within trees and below ground. Arborists cannot guarantee that a tree will be healthy or safe under all circumstances, or for a specified period of time. Likewise, remedial treatments, like any medicine, cannot be guaranteed.

Treatment, pruning, and removal of trees may involve considerations beyond the scope of the arborist's services such as property boundaries, property ownership, site lines, disputes between neighbors, and other issues. An arborist cannot take such considerations into account unless complete and accurate information is disclosed to the



## APPENDIX A: ARBORIST MEMORANDUM - PAGE 4

arborist. An arborist should then be expected to reasonably rely upon the completeness and accuracy of the information provided.

Trees can be managed, but they cannot be controlled. To live near trees is to accept some degree of risk. The only way to eliminate all risk associated with trees is to eliminate the trees.

### Certification of Performance

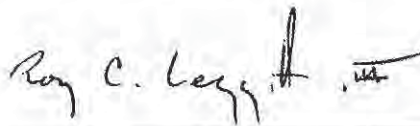
I, Roy C. Leggitt, III, Certify:

- That we have inspected the trees and/or property evaluated in this report. We have stated findings accurately, insofar as the limitations of the Assignment and within the extent and context identified by this report;
- That we have no current or prospective interest in the vegetation or any real estate that is the subject of this report, and have no personal interest or bias with respect to the parties involved;
- That the analysis, opinions and conclusions stated herein are original and are based on current scientific procedures and facts and according to commonly accepted arboricultural practices;
- That no significant professional assistance was provided, except as indicated by the inclusion of another professional report within this report;
- That compensation is not contingent upon the reporting of a predetermined conclusion that favors the cause of the client or any other party.

I am a member in good standing of the American Society of Consulting Arborists and a member and Certified Arborist with the International Society of Arboriculture.

I have attained professional training in all areas of knowledge asserted through this report by completion of a Bachelor of Science degree in Plant Science, by routinely attending pertinent professional conferences and by reading current research from professional journals, books and other media.

I have rendered professional services in a full time capacity in the field of horticulture and arboriculture for more than 20 years.



Signed:

Date:

4/19/10

## Tree Management Experts

Consulting Arborists

3109 Sacramento Street  
San Francisco, CA 94115

Member, American Society of Consulting Arborists  
Certified Arborist, International Society of Arboriculture

cell/vm 415.606.3610

office 415.921.3610

fax 415.921.7711

email [RCL3@mindspring.com](mailto:RCL3@mindspring.com)



## Curriculum Vitae

**Roy C. Leggitt, III**

*Consulting Arborist and Plant Scientist*

### Education:

Bachelor of Science, California State University – Fresno.  
Plant Sciences, Ornamental Horticulture

### Professional Qualifications

Member, American Society of Consulting Arborists  
Graduate, ASCA 2003 Consulting Academy  
Certified Arborist WE-0564A, International Society of Arboriculture  
Certified Tree Risk Assessor CTRA#499, International Society of Arboriculture, PNW Chapter  
California State Contractor License for Tree Service C61/D49 #885953

### Continuing Education / Topic or Seminar Titles

Selection of methodology in tree appraisal  
Tree Appraisal Workshop  
Tree Appraisal Theory and Practice: An Advanced Seminar  
Testifying Skills for Consulting Arborists  
Trees and the Law  
Understanding Soils  
Soil Compaction  
Roots and Soils  
Reforestation in the Forest, Suburbia and the City  
Palm Cultivation  
Sudden Oak Death  
Tree Preservation During Construction  
Hazard tree risk assessment and management  
National Tree Failure Program  
Body Language of Trees  
Tree Physiology  
Davey Operational Safety program  
Fire Risk Management  
Riparian zone conservation  
Resistograph® Certification Seminar

### Areas of Specialized Study

Plant physiology and biology  
Plant taxonomy  
Arboriculture  
Irrigation technology  
Landscape design  
Plant pathology and mycology  
Risk assessment  
Arboricultural biomechanics



## Tree Management Experts

### Consulting Arborists

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fax 415.921.7711

email [RCL3@mindspring.com](mailto:RCL3@mindspring.com)

---

#### Related Fields of Study

Agronomy and viticulture  
Soil sciences  
Geological sciences  
Computer sciences and programming  
Mathematics  
Physics

#### **Employment:**

1987-Present Self-employed Consulting Arborist and Horticultural Consultant.  
1992-2002 The Davey Tree Expert Co., Inc.: project management, representative, consultant.  
1989-1992 Golden Coast Environmental Services, Inc.: project management and northern California representative.  
1988-1989 City of Fresno: supervised team of 4 data collectors to develop citywide inventory. Developed and adapted software throughout project.  
1987-1988 Center for Irrigation Technology: research on sprinkler distribution patterns using laser scanning to measure droplet size.

#### **Agency Certifications:**

Small Business Administration: Certified Small Business DUNS# 12-783-9798

San Francisco Human Rights Commission: Certified Local Business Enterprise (LBE) and Certified Disadvantaged Business Enterprise (DBE). Certification number: HRC020914873

San Francisco Redevelopment Agency: Certified Small Business Enterprise (SBE). Certification number: 113-10706-013

#### **Consultant:**

##### Municipal and Agencies

1988-1989: City of Fresno: managed an in-house street tree inventory project, including staff training and management, data quality control, software modifications and implementation of database.

1989: City of Palo Alto: managed data collection and software implementation for a City-wide street and right-of-way tree inventory.

1989-1990: City of Visalia: managed data collection and software implementation for a street tree inventory and a valley oak conservation study of all areas within City limits.

1990: City of Manteca: City-wide street tree inventory and management plan.

1990: City of Lancaster: City-wide street sign inventory.

1990: City of Pasadena: City-wide inventory of street trees, street lighting, sidewalk damage survey; site-specific sidewalk redesign specifications to accommodate tree needs.

1990-1992: City of Los Angeles: managed 6 staff data collectors. Oversaw data quality and localized data base installations in field offices.



## Tree Management Experts Consulting Arborists

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1994-1997: City and County of San Francisco, Housing Authority: tree surveys, tree management planning and contract administration for Sunnydale (phase I), Hunter's View, Potrero Terrace and Potrero Annex.

1999-2000: City of Pacifica: risk assessment tree survey for 639 trees including a recommendation for removal of 119 trees. Represented the City on a panel to answer over 200 citizen inquiries. Represented the City to administer the tree service contract.

1999-2000: National Park Service, Fort Mason: inspections and reports to facilitate tree management decisions. Evaluation based on safety and neighbor concerns. Conducted 3-hour training session for staff on proper pruning techniques.

2002: National Park Service, Muir Woods National Monument: deconstruction planning, hazard evaluation and construction planning in tree-sensitive areas.

2002-Present: City of Pacifica: site-specific inspections and recommendations for management decisions, risk assessment and dispute resolution.

2003: City of Pacifica: tree risk assessment and tree management study. Field report and geographic information system developed to implement tree removal, reforestation and replacement tree conservation in a residential neighborhood and riparian zone parks.

2003-2006: USDA Research Station, Albany: soil nutrition and hydrology survey; plant location, size and health survey; comprehensive interpretive report with map inserts.

2004: City of San Pablo: site assessment, tree health assessment and recommended remediation for 44 palm tree planting sites in a commercial district.

2004-2005: City of Oakland: Leona Quarry Redevelopment Master Plan; plan review, project compliance with conditions of approval.

2005-2006: City of Oakland: City-wide tree inventory; estimated 300,000 tree sites. Vector-mapping by block side, PDA data collection, database development, GIS implementation.

2006-2007: City of Pacifica: tree risk assessment and tree management study for all large trees managed by the City that are located in streets and parks.

2006-2007: San Francisco Public Utilities Commission with Ecology & Environment, Inc: Crystal Springs Pipeline No. 2 project. Provided the tree survey and arborist memorandum for an environmental impact report. Tree protection and mitigation measures were evaluated at the Municipal, County and State levels, including considerations under the California Environmental Quality Act (CEQA) and SB-1334.

2006-2008: Federal Building, Golden Gate Plaza with PGA Design: provided design review, species selection and site management and monitoring specifications.

2007: City of Pacifica: Author of DPW publication *Trees for Pacifica: Tree Selection and Planting Guide* to provide appropriate species selection based on site assessment, wind, coastal influence, tree size and growth rate with ornamental and native species.

2008: State Compensation Insurance Fund: tree health and site assessment with recommendations for tree care. Review of new plaza to preserve existing trees during construction.

2008-Present: San Francisco Public Utilities Commission with ESA/Orion Joint Venture: Crystal Springs Pipeline No. 2 project. Provided project refinement and enhancement of options through inclusion of tree impacts caused by use of helicopters, temporary bridge construction and installation of cathodic protection.



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2008-Present: City of Oakland, with PGA Design: City sidewalk repair specifications, monitoring and stress tests.

2008: National Park Service, San Francisco Maritime National Historic Park: tree health and risk assessment with recommendations.

#### Management Planning

1998-1999: Laguna Heights Co-op Corp.: tree inventory and mapping for 450-tree association property. Tree management plan and 10 year maintenance cost projections.

2003-Present: Treasure Isle HOA: database tree inventory, tree maintenance and management plan, creation of a fully cross-indexed management manual and project management. Ongoing assistance with vendor oversight, conflict resolution and interfacing with City staff. 16-acre site.

2003-Present: Bohemian Club, San Francisco: management for intensely used urban planting sites for Boston ivy, trees and shrubs.

2004: La Salle Heights HOA, San Francisco: tree and vegetation study for a 16-acre site with 800 trees, native plants, invasive exotic plants and landscaping. Data and analyses included pest and disease management, species selection, fire risk assessment, irrigation assessment, erosion, soil properties and preparation of a site map.

2004-Present: Longwater HOA, Foster City: tree inventory, site mapping and management plan for 207 trees in common areas. Many young trees were inspected with nursery, planting and cultivation problems. Management planning included species suitability, planting density, remediation strategies and maintenance recommendations. Large trees primarily required health and risk assessment with maintenance recommendations. Ongoing inspections.

2004-Present: Barron Square HOA, Palo Alto: tree inventory, site mapping and management plan for 259 trees of 37 species in common areas. Primary areas for recommendations were risk assessment, planting density, irrigation, drainage, infrastructure conflicts and maintenance. Ongoing inspections.

2004-Present: Edgewater Isle South HOA, San Mateo: tree inventory, site map and management plan for 135 trees in common areas. Site assessment and tree planting plan in 2006. Ongoing inspections.

2005-Present: Edgewater Isle Master Association, San Mateo: tree inventory, digital site mapping, comprehensive management plan and field manual. Tree health, risk assessment and infrastructure conflicts evaluated. Site assessment and tree planting plan in 2006. Ongoing inspections.

2005: Serravista HOA, South San Francisco: site assessment, tree health assessment, species recommendations and Planning Department documents

2006-Present: Alverno Hill HOA, Redwood City: construction impacts and landscape plan review from neighboring property development and a fire risk assessment report.

2006-Present: Whaler's Island HOA, Foster City: tree inventory, digital site mapping, comprehensive management plan and field manual. Tree health, risk assessment and infrastructure conflicts evaluated. Ongoing inspections.

2007-Present: Glenridge Apartments Co-operative: tree risk assessments and recommendations

2007-Present: Oak Commons HOA, Gilroy: tree health and risk assessment of 3 large oaks with recommendations. Evaluation of new tree health, crowded plantings and installation and nursery defects for over 900 new trees within new development landscaping with recommendations.



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---

2007-2008: Pitcairn HOA, Foster City: tree health and risk assessment with cultivation recommendations.

## Construction Mitigation

1995-2001: Proulx properties: 7-year project to combine 4 large estates including management of natural areas, private golf course design/build impacts, new infrastructure, private vineyard and orchard.

1998-2004: Bay Area Discovery Museum: preservation of historic eucalyptus trees from design stages through construction during a 15,000 square foot expansion over 5 years.

1998-2002: Presidio Hill School: building and utility service design modifications necessary to preserve 3 large trees during historic building preservation and new construction over 4 1/2 years.

2001: #1 Front Street: comprehensive report to assess problems and recommend remedial steps for cultivation of 41 trees in containers on high-rise roof terraces.

2002-2003: Marina Chateau: 8<sup>th</sup> floor deck-installed design including a decorative screen and selection of containers and plants.

2004: The Altemheim, Oakland: tree survey and report to conserve a rare plant and historic landscape of 6.2 acres during an adaptive reuse construction project.

2002-2007: Laguna Honda Hospital: tree preservation and conservation of a historic arboretum, and tree preservation at various new building construction sites within a 63-acre site to be executed over 10 years.

2004-2008: Cavallo Point and Healing Arts Center (The Retreat at Fort Baker), Sausalito. Site assessment, health assessment, construction modification, tree protection and preservation recommendations, co-author and lead consultant of a 10-year tree management plan.

2004-2006: GK Builders: tree protection and preservation planning for residential development.

2004-2007: Simpson Design Group: tree protection and preservation planning for residential development.

2004-2006: Sal Caruso Design Corporation: tree protection and preservation planning for various condominium conversion projects and for the Fremont Child Care Center.

2004-2007: Worldco Company, Ltd: tree protection, planning, tree and landscape design issues.

2005: EDAW, Inc.: project planning, including tree protection, preservation and species selection.

2005-2007: Devcon Construction: tree protection and preservation planning, on-site inspections during construction, mitigation recommendations, maintenance recommendations.

2005-2008: Safeway, Inc: tree assessment, site assessment, design review, tree protection measures and new planting recommendations.

2006-Present: DES Architects & Engineers: tree assessment, site assessment, appraised values and tree protection during construction.

2008: Hanover Company: tree health and risk assessment for the Candlestick Cove project in San Francisco.

2007-2008: Royston Hanamoto Alley and Abey (RHAA): City College of San Francisco. Provided design review, analysis of site conditions, species recommendations and spacing requirements for the re-design of the core areas of the campus and expanded areas adjacent to the reservoir.

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---

2009-Present: Webcor Construction, Inc: San Francisco General Hospital. Provided pre-construction evaluation of trees and soil conditions, recommending removal, transplanting, pruning and tree protection measures. Project Arborist for new construction and utilities.

#### Maintenance Management

2004-Present: Bay Area Discovery Museum: maintenance planning and maintenance policy development for outdoor educational exhibit areas.

2003-Present: Bohemian Club, San Francisco, providing conservation and management of extensive Boston ivy, trees, shrubs and irrigation at their downtown site.

2004-Present: Kaiser Permanente hospitals, 2 sites in San Francisco, providing management of all tree-related decisions and maintenance.

#### Natural Areas

2001-2003: Presidio Trust: ongoing volunteer participation including site restoration, maintenance and monitoring for quail habitat sites.

2001-2004: Kirsch property; riparian zone site evaluation, recommendations, re-vegetation planning and monitoring requirements, vineyard impacts and management issues.

2004-2005: City of Oakland, with PGA Design: Leona Quarry Redevelopment Master Plan; plan review, project compliance with conditions of approval integrating with natural areas.

#### Small Projects

1987-Present: Consultation and Arborist Reports: routinely created as guidance to project sponsors, contractors, Architects, landscape maintenance companies, commercial property managers, residential owners, concerned neighbors, Municipalities and insurance companies. Projects are throughout the San Francisco bay area with a concentration on the Peninsula, in San Francisco and in Marin County. Projects are too numerous to list separately.

#### Public Hearings

Representation at local government public hearings is a routine assignment.

#### Appraisals and Claims Settlement

1987-Present: Trespass and Negligence: routinely provide inspections, reports and appraisals for small trespass and negligence cases, generally negotiated, mediated, arbitrated, settled out of court or settled in small claims court.

1992-2002: The Davey Tree Expert Co., Inc.: provided all tree appraisals for the district office serving San Mateo and San Francisco counties.

1992-Present: California State Automobile Association: routinely provide inspection and appraisal information for claims settlement on both homeowner policies and automobile policies.

1994-2006: Farmer's Insurance: routinely provide inspection and appraisal information for claims settlement on real estate policies.

1999-Present: City of Pacifica: forensic investigations and technical report writing as an expert for tree dispute resolution.

2004-Present: State Farm Insurance: provide inspection and appraisal information for claims settlement.

2008: Shelter Ridge HOA, San Rafael: tree health and appraisal for damaged trees.



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### Expert Witness

Routinely provide expert opinion and testimony on tree and horticulture issues to areas of legal practice that include Land Use, Real Estate, Trespass, Negligence and Personal Injury.

Trained and certified within the field of Arboriculture in technical report writing, forensic sciences, expert case preparation, deposition procedure and trial procedure.

#### Partial list of attorney-clients:

Carmen M. Aviles, esq. of Bledsoe Law Firm for defendant  
David Balch, esq. of Kennedy, Archer & Harray for defendants  
Steven A. Booska, esq., for plaintiffs and defendants  
Matthew Davis, esq. of Walkup Law Office for plaintiffs  
Phillip Fant, esq. of Cozen O'Connor for plaintiffs  
Ira A. Freydakis, esq., for plaintiff  
Brian Gearing, esq., of Gearing Law Group for plaintiff  
Robert Harrison, esq. of Wright, Robinson, Ostheimer and Tatum for defendant  
Richard Herzog, esq., for defendant  
Peter Lynch, esq. of Cozen O'Connor for plaintiff  
Todd Master, esq. of Howard, Rome, Martin & Ridley for defendant  
Thomas J. McDermott, esq. of Bragg & Kuluva for plaintiff  
Mark Mosley, esq. of Seiler Epstein Ziegler & Applegate for plaintiff  
Dan Reilly, esq. for defendant

Confirmed Expert Witness in Superior Courts: San Francisco, Santa Clara and Monterey Counties.

### Lectures and Presentations:

1995: Three one-hour lecture sessions to College of San Mateo General Ornamental Horticulture class titled: "From Planting to Pruning of Woody Ornamentals in the Landscape."

1998: Three one-hour lecture sessions to College of San Mateo General Ornamental Horticulture class titled: "From Planting to Pruning of Woody Ornamentals in the Landscape."

1999: One-hour slide lecture at the Presidio to National Park Service Landscape Architects from across the country. Lecture topic: *History in Pruning: historic plantings and historic pruning.*

April 2002: Urban forestry presentation to San Francisco Department on the Environment

May 2002: Presentation to Tree Advisory Board on Landmark Tree Nominations in San Francisco

October 2004: Two-hour presentation for a Certified Arborist examination preparation class titled: "Assessment and Risk Management"

October 2004: Presentation of industry-specific use of scientific tools at Tool Day

November 2004: Presentation titled: "Tree Health During Construction"

January 2005: Presentation with handouts titled: "Air-spade: Uses, Limitations and Specifications"

March and April 2006: Two tree walks in Palo Alto for Canopy

August 2006: PowerPoint presentation to the Association of Bay Area Governments (ABAG) with handouts titled: "Integration of Risk Reduction Pruning to Municipal Management Systems"

May 2007: PowerPoint presentation to Bay Area staff from The Care of Trees®, Inc. with handouts titled: "Risk Reduction Pruning"



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September 2007: PowerPoint presentation to the Western Chapter International Society of Arboriculture (WCISA) with handouts titled: "Integration of Risk Reduction Pruning Into Municipal Management Systems"

November 2008: One-hour presentation with 8 page handout for a Certified Arborist examination preparation class titled: "Tree Assessment and Risk Management"

### Media:

#### Featured by Media

American Way: September 15, 1989, Mini-Splendored Things

The Fresno Bee: May 14, 1990, Editorials, Tree Spirits in Visalia

Visalia Times-Delta: 1991, Arborist takes Visalia's trees to heart

The Fresno Bee: 1991, Taking stock of Visalia's roots

Stockton Record: 1991, Sizing Up Manteca's Trees

Bay Guardian: April 16, 1997, Endangered species

San Francisco Chronicle: May 14, 2008, City takes the case of mystery manzanita

San Francisco Examiner: April 27, 2009, Art project may be putting trees at risk

#### Author or Speaker via Media

Storm Report of December 1994

ABC Television: 20-minute storm report interview

ABC Radio: 10-minute interview

SF Apartment Magazine, October 2003, Tree Dispute Resolution

Canopy: Trees for Palo Alto newsletter, Fall 2005, *Ask the Arborist* column

### Public Policy:

Tree Advisory Board (volunteer): regular attendance and participation from June 1995.

Appointed as voting Member by the Director of the Department of Public Works in June 1998.

Appointed by the Board as Chair of the Landmark Tree Committee.

City of San Francisco: developed a partnership between corporate tree care and the Clean City Coalition to benefit DPW. Provided pro bono recommendations to DPW staff.

City of San Francisco: developed a maintenance agreement strategy to allow proper maintenance by an outdoor advertising company of previously city-maintained trees.

Tree Summit, Friends of the Urban Forest (volunteer): panel member for discussion of Urban Forestry among public and private sector stakeholders to develop the State of the Urban Forest Report, 2000.

City of San Francisco: assisted in modifications to Department of Public Works code Article 16. Ordinance changes include integration of various departments, the creation of the Bureau of Urban Forestry, and creation of the Urban Forest Council.

2008: EDAW, Inc.: San Francisco Urban Forestry Master Plan for the San Francisco Planning Department. The Consulting Arborist for a team to develop a Master Plan to integrate Arboriculture, Urban Design, infrastructure conflicts, sustainable ecology, funding strategies and maintenance alternatives.

Conservatory Foundation (non-profit): served 6 years on the Board of Directors to preserve the rare plant collection and the building, Golden Gate Park Conservatory of Flowers, San Francisco.



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---

City of East Palo Alto: pro bono assistance to City staff in developing a heritage tree protection ordinance.

Canopy (non-profit): pro bono assistance in formulating a public-private partnership with the City of East Palo Alto and their citizens for the first volunteer-oriented public tree planting project. Assisted Canopy with the grant funds application to the California Department of Forestry.

Friends of the Music Concourse: provided expert assistance over more than 1 year and public testimony on several occasions to achieve landmark status for historic trees in the Music Concourse of Golden Gate Park in San Francisco. The Music Concourse and the historic grid of trees were declared a City Landmark in December 2005.

Canopy (non-profit): Board member from February, 2007 to present.

### Professional Affiliations and Memberships:

American Society of Consulting Arborists (ASCA), Member  
International Society of Arboriculture (ISA), Life Member  
Western Chapter, International Society of Arboriculture (WC-ISA), Member

### Related Affiliations and Memberships:

California Native Plant Society  
California Invasive Plants Council  
Canopy  
Friends of the Urban Forest  
National Audubon Society  
Natural Resources Defense Council  
Golden Gate Audubon  
Nature Conservancy  
Sempervirens Fund  
San Francisco Botanical Garden Society  
Sierra Club

**From:** Bill Wycko/CTYPLN/SFGOV  
**To:** Don Lewis/CTYPLN/SFGOV@SFGOV, Sarah B Jones/CTYPLN/SFGOV@SFGOV  
**Date:** Monday, December 12, 2011 12:53PM  
**Subject:** Fw: Beach Chalet

---

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 12/12/2011 12:53 PM -----

**"Rob Hurlbut (Attune)"**  
**<Rob@AttuneFoods.com>**

12/09/2011 08:11 AM

To<bill.wycko@sfgov.org>,  
<don.lewis@sfgov.org>  
cc<c\_olague@yahoo.com>,  
<rm@well.com>,  
<wordweaver21@aol.com>,  
<plangsf@gmail.com>,  
<mooreurban@aol.com>,  
<hs.commish@yahoo.com>,  
<rodney@waxmuseum.com>,  
<linda.avery@sfgov.org>  
SubjectBeach Chalet

Dear Mr. Wycko and Mr. Lewis,

I am writing to indicate my strong support the proposed renovation project of the Beach Chalet Fields. As the parent of two active kids, the coach of two teams (soccer and lacrosse), a long time resident and the owner of a business in the city I feel it is vital that we improve access to playing fields to improve the health and social fabric of our community. The work done on other playgrounds and fields has been a huge step towards improving life here and we need more. Field space is in very tight supply and is essential to building a strong and healthy population. One only needs to see the smiling faces of players (8 to 58!) on the pitch to realize what a huge value this is to the city. I urge you to get the project going with all due haste!

01

Thank for the work you are doing.

Regards,

Rob

**Rob Hurlbut**

CEO, Attune Foods Inc.

900 Kearny Street, Suite 600, San Francisco, CA 94133

D: 415-486-2102 C: 415-902-1096 O: 415-486-2101

@attunefoods @attunefoods, [www.attunefoods.com](http://www.attunefoods.com)



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**From:** Bill Wycko/CTYPLN/SFGOV  
**To:** Don Lewis/CTYPLN/SFGOV@SFGOV, Sarah B Jones/CTYPLN/SFGOV@SFGOV

---

**Date:** Monday, December 12, 2011 12:41PM  
**Subject:** Fw: Beach Chalet Project

---

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 12/12/2011 12:42 PM -----

**Kathryn Hyde**  
<kathryn\_hyde@hotmail.com>

Tobill.wycko@sfgov.org  
cc  
Subject: Beach Chalet Project

12/11/2011 04:11 PM

December 9, 2011

Dear Mr. Wyco –

The purpose of this message concerns the Draft EIR for the Beach Chalet Athletic Fields.

I oppose the installation of this new project, my concerns are listed below:

1) Lighting will be detrimental to the wildlife and to the people who live in the area.

2) GG Park is an icon and it already plagued by too many people and events. It should be left as natural as possible, artificial turf is dangerous to children and it recues the space for the wildlife in GGP.

3) I would like a through investigation of the detrimental effects of the plastic turf on children from frequent use and also if they fall and are cut by the plastic turf.

4) I oppose the proposal to renovate the Beach Chalet Athletic Fields with artificial turf and stadium lights. I support the Compromise Alternative put forth by the public during the Planning Commission hearing of December 1<sup>st</sup>, 2011. The Compromise Alternative is to renovate the Beach Chalet fields with natural grass and no lighting and to renovate the West Sunset Playground to provide more hours of play for youth soccer. I request that the Planning Department focus on this alternative and work to find a solution that protects Golden Gate Park's parkland.

5) Why are there so many paved paths in a park that is supposed to be naturalistic parkland?

01

02

03

04

05

6) Lighting - In addition to the stadium lighting, there will be lighting for paths and lighting for parking also - what will be the cumulative impact on this "wild" end of the Park for people? What will be the cumulative impact for wildlife?

06

7) The DEIR ignores the cumulative impact of the fields and the Westside Water Treatment Plant. The two projects together form a barrier that is over 50% of the width of the Park - why does the DEIR ignore this? What is the impact on the overall design and e

07

I appreciate your time and hard work. I know this is a difficult decision and there are many people involved in the final decision.

Best,

Kathryn Hyde

4611 California Street

San Francisco, CA 94118

Richard Ivanhoe  
516 Clayton St.  
San Francisco, CA 94117  
December 13, 2011  
415-342-8030

Bill Wycko  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103-24709

By Email to: bill.wycko@sfgov.org

Re: Beach Chalet Athletic Fields Renovation  
Planning Department Case No. 2010.0016E  
Comments on Draft Environmental Impact Report

Dear Mr. Wycko:

I have read the Draft Environmental Impact Report on the Beach Chalet Athletic Fields Renovation, and have the following comments and questions:

**FAILURE TO EXTEND COMMENT PERIOD**

Along with many other members of the public who attended the December 1st hearing and requested an extension of the comment period for this Draft EIR, I was disappointed that you did not provide additional time for public comment. Although the 47-day period provided falls within the 30 to 60 day guidelines provided by 14 California Code of Regulations 15105, the Regulations (14 CCR 15141) also provide that the text of draft EIRS should normally be less than 150 pages. Here, the text runs to about 300 pages. Although a Draft EIR of this length is not uncommon in San Francisco, it seems that the State Regulations would support additional time to review a Draft EIR of double the presumed normal length.

I apologize for submitting my comments late. I intended to prepare my comments last weekend and submit them timely, but was ill with flu and was not able to write. I tried to prepare a rushed version before the December 12 deadline, but then ran into computer problems. I hope you are still able to accept these comments.



Bill Wycko  
 December 13, 2011  
 Page 2

## **COMMENTS AND QUESTIONS ON THE DRAFT EIR**

### **Executive Summary**

#### **Objectives**

Although the Executive Summary does discuss project objectives within each of the proposed Alternatives, it would be more useful to the reader to list the project objectives at or near the beginning of the Executive Summary. These objectives are listed in bullet format at page II-5 (within the Project Summary section of the Draft EIR). Whether these objectives are worthwhile may be beyond the scope of an EIR, but it would be useful to know who makes the determination. I am not certain that increasing nighttime use of the west end of Golden Gate Park is a worthwhile objective. I also have doubts as to whether increasing play time on the Beach Chalet Athletic Fields to the extent proposed is worthwhile—I can agree with additional daytime use, but not with these fields being used as late as 10 p.m.

01

#### **Alternatives**

Many of the public comments in favor of the project at the December 1<sup>st</sup> hearing mentioned that the project would help meet the needs of children from the Southern part of the City (Bayview, Hunters Point, and Mission) who do not have adequate soccer fields in their neighborhoods. Although probably beyond the scope of this EIR, perhaps the Off-Site Alternative should consider renovations in these neighborhoods, as well as the West Sunset Playground.

02

Alternatives proposed include “Grass Turf with Reduced Lights” and “Synthetic Turf with No Lights.” What about “Grass Turf with No Lights?” it seems that this would require digging only one foot below the surface rather than ten feet, and might not require tree or shrub removal. There does not appear to be any analysis of how improved drainage would impact the grass turf fields.

03

#### **Summary of Impacts and Mitigation Measures**

What is the source of this table at pages ES-9 through ES-14? The findings of Less than Significant Impact prior to Mitigation for Impacts AE-1, AE-3, TR-1, AQ-1, HY-1, and HZ-1 are inconsistent with the Notice of Preparation and Initial Study, which found Potentially Significant Impacts for each of these elements (and also found potentially significant impacts for elements AE-4, AE-5, CP-4, RE-2, RE-3, RE-4, HY-4, and HY-7, which are not listed on this table). Have these environmental impacts been “swept under the rug,” or are they addressed elsewhere in the Draft EIR?

04

Bill Wycko  
December 13, 2011  
Page 3

## **Environmental Setting and Impacts**

### **Aesthetics**

I am most concerned about the proposed lights and their effects on night views in the area. Figure IV-B-10 is somewhat informative, but is taken from an angle where the traffic and other lights surrounding the Great Highway are very distracting. Before and simulated after views from perhaps Cabrillo and 47<sup>th</sup> Avenue and Irving and 47<sup>th</sup> Avenue could be more enlightening as to the effects these lights might have. The view of the Crocker-Amazon Fields at figure IV.B-11 demonstrates the potential impact these lights could have on nighttime views. This degree of lighting seems more appropriate for Kezar Stadium than for the western end of Golden Gate Park.

05

### **ADDITIONAL COMMENTS**

I again need to apologize for not completing these comments. I am still recovering from flu, and need to rest and recover. I am already a day late on these comments. Other concerns that I am not able to adequately detail are 1) the synthetic turf will need to be replaced every ten years or so. Who is going to pay for its replacement? Recreation and Park Department has within the past few years shown an inability to maintain what it has built. 2) I am not convinced that the synthetic turf is not toxic –to the athletes playing on the field and due to runoff from the field. Thank you for considering these comments.

06

07

Sincerely,

Richard Ivanhoe

From: Joan Joaquin-Wood [<mailto:joanwood@earthlink.net>]  
Sent: Monday, December 12, 2011 9:40 AM  
To: Bill Wycko EIR review  
Cc: Ocean Edge Katherine Howard; Bd.of Supes S.F.  
Subject: Beach Chalet Soccer Fields DEIR

Mr. Wycko:

I write to urge you to re-do the EIR for this project or else accept the Compromise Alternative.

This project is a thinly disguised plan for a professional soccer stadium masquerading as a gift for the children of San Francisco. The artificial turf which is a part of the project is far more expensive than proper maintenance of natural grass and will be dangerous besides. It would need renewing every 8 to 10 years at a huge cost and is potentially poisonous because of the components that include ground up tires that will disintegrate and disperse. Please do not add to the commercialization of our parks propelled by developers and City managers who have been appointed with agendas to fulfill rather than the best interests of San Francisco. There are many good reasons why San Francisco is one of the most popular destinations in the world and Golden Gate Park is paramount among them.

01

02

Another part of the overall plan calls for removal of 56 trees described as brush and shrubs so as to avoid individual review before their removal. This would degrade the necessary windbreak keeping ocean winds at bay, particularly when considered with the 176 trees to be removed when and if the adjacent water treatment facility is approved. Of course the aggregate impact of both the water treatment plant and the soccer stadium should have been considered together and has not been.

03

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These are just the most significant issues that need further consideration before this project is approved. I refer you to the reports and objections filed by the Heritage Foundation, National Trust, Preservation Consortium, DOCOMOMO, and other organized groups as well as the dozens of individuals who keep begging you not to go forward with the current EIR.

Joan Wood, Third Generation San Franciscan  
Joan Wood



I-Johnson

**From:** Bill Wycko/CTYPLN/SFGOV  
**To:** Don Lewis/CTYPLN/SFGOV@SFGOV, Sarah B Jones/CTYPLN/SFGOV@SFGOV

---

**Date:** Monday, December 12, 2011 12:24PM  
**Subject:** Fw: Synthetic Turf Compromise

---

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 12/12/2011 12:25 PM -----

**"Dominic L. Johnson"**  
**<dominic@aturf.com>**

To <bill.wycko@sfgov.org>  
 cc

Subject Synthetic Turf Compromise

12/12/2011 09:59 AM

Bill,

I am a sales rep. with A-Turf, we are a synthetic Turf Field Builder. I have been following this project for quite a while now and am very aware of the opposition many people have towards synthetic turf. I understand the environmental impacts (both positive & negative) that come with the construction of a synthetic turf sports field. Our company has developed a product that we think will help find common ground between proponents and opponents to synthetic Turf.

Our Titan SS is a turf system that does not use recycled car tires for the infill, instead we use a 100% sand infill. The Sand infill eliminates the worry of Storm water pollution caused by Crumb rubber migration, the sand stays cooler than black rubber, it is all natural, and it can be reused 12 years down the road when the Turf is replaced. 01

Please let me know if you would like more information about this product, I would also be happy to meet with you in person to discuss the product.

Kind Regards,

Dominic Johnson  
 Sales & Project Manager  
 A-Turf INC.  
 490 W. Vuelta Friso  
 Sahuarita, AZ 85629  
 520-260-8544 Cell  
 888-810-7030 Fax  
 dominic@aturf.com  
<http://www.aturf.com>  
<http://www.surfaceamerica.com>



Sarah B  
Jones/CTYPLN/SFGOV  
11/29/2011 04:03 PM

To Don Lewis/CTYPLN/SFGOV@SFGOV  
cc  
bcc  
Subject Fw: Objection to Proposed Golden Gate Park Projects

Sarah Bernstein Jones  
Senior Environmental Planner  
sarah.b.jones@sfgov.org  
(415) 575-9034

-----  
San Francisco Planning Department  
1650 Mission St, Suite 400  
San Francisco, CA 94103

----- Forwarded by Sarah B Jones/CTYPLN/SFGOV on 11/29/2011 04:04 PM -----



Erika  
Lovejoy/CTYPLN/SFGOV  
11/29/2011 04:03 PM

To Sarah B Jones/CTYPLN/SFGOV@SFGOV  
cc  
Subject Fw: Objection to Proposed Golden Gate Park Projects

FYI, to pass on to your staff.

Erika Lovejoy  
Senior Environmental Planner  
Environmental Planning  
San Francisco Planning Dept.  
(415) 575-9026

----- Forwarded by Erika Lovejoy/CTYPLN/SFGOV on 11/29/2011 04:03 PM -----



Sean Joyce  
<seanjoyce81@gmail.com>  
11/28/2011 08:51 PM

To erika.lovejoy@sfgov.org  
cc  
Subject Objection to Proposed Golden Gate Park Projects

I am writing to express my serious concern about the two proposed projects in Golden Gate Park near Ocean Beach. I strenuously object to the idea of putting artificial grass and giant lights on the soccer fields and the proposed water treatment plant.

As a local resident, and a parent, who has lived in this area for over 8 years, I am utterly opposed to both proposed projects. In addition, I believe each project is not in the best interest of city of San Francisco or the residents and visitors of this city.



The west section of Golden Gate park is a true gem for this city and it's residents. While I do not know why these projects are proposed, I cannot think of any valid reason to completely tarnish one of the most beautiful, wonderful spots in San Francisco. Also considering the increased traffic, noise and the reduction in safety for people like us with young kids in the area, these projects are a terrible idea.

01  
02

In addition, as a person who watched the long and costly renovation of the Murphy Windmill (and believes that this project will draw significant numbers of tourists) I have to wonder why the city would now put a large, unattractive water treatment plant virtually next door. That is completely inconsistent.

03

Finally, the thought of losing over 250 trees from the park is simply not acceptable.

04

I cannot express my concern more seriously. There is no benefit to be derived from these projects that will outweigh the significant negative impact on this area and its residents.

I implore you to stop these projects for the benefit of all residents and the great city of San Francisco.

Thank you.

Sean Patrick Joyce

1547 48<sup>th</sup> Ave.

San Francisco, CA



Linda Avery/CTYPLN/SFGOV

11/21/2011 01:32 PM

To

cc Don Lewis/CTYPLN/SFGOV@SFGOV, Sarah B  
Jones/CTYPLN/SFGOV@SFGOV, Bill  
Wycko/CTYPLN/SFGOV@SFGOV, Patricia

bcc

Subject Fw: Request for extension of time re DEIR Beach Chalet  
Athletic Fields

*Linda D. Avery-Herbert*

Director of Commission Affairs

SAN FRANCISCO PLANNING COMMISSION &  
SAN FRANCISCO HISTORIC PRESERVATION COMMISSION

1650 MISSION STREET – SUITE 400

SAN FRANCISCO, CA 94103-2414

TEL: 415.558.6407 – FAX: 415.558.6409

WEBSITE: [www.sfgov.org/planning](http://www.sfgov.org/planning)

----- Forwarded by Linda Avery/CTYPLN/SFGOV on 11/21/2011 01:32 PM -----



jason jungreis

<jasonjungreis@gmail.com>

11/21/2011 01:30 PM

To c\_olague@yahoo.com, linda.avery@sfgov.org

cc

Subject Request for extension of time re DEIR Beach Chalet Athletic  
Fields

RE: Beach Chalet Athletic Fields DRAFT EIR

Planning Department Case No. 2010.0016E

State Clearinghouse No, 2011022005

Dear President Olague,

I request the Commission grant a 90 day extension of time for public comment on the DEIR  
Beach Chalet Athletic Fields.

Comments are currently due December 12<sup>th</sup>. However, due to the extensive and complex and  
technical nature of the DEIR, and the need to understand this DEIR in relationship to other  
potential Golden Gate Park projects, and with the holiday period upon us, I believe this request  
for an extension of time to comment is reasonable and does not prejudice the proposed project.  
However, I believe the denial of this request for an extension of time will unfairly burden and  
thereby prejudice the opportunity for public comment on this important project.

01

Thank you, and I look forward to your response.

Jason Jungreis

527 47th Avenue

San Francisco, CA 94121

415-750-0830





jason jungreis  
<jasonjungreis@gmail.com>  
11/30/2011 12:45 AM

To linda.avery@sfgov.org  
cc Eric.L.Mar@sfgov.org, Carmen.Chu@sfgov.org,  
ed.lee@sfgov.org, don.lewis@sfgov.org, Dan Mauer  
<Dan.Mauer@sfgov.org>

bcc

Subject Comment upon the Draft Environmental Impact Report on  
the Beach Chalet Soccer Fields Project Proposal

History: This message has been forwarded.

To Whom It Concerns: Please ensure that the Planning Commission (and those on the cc list) receive this email. Thank you.

In Re: Comment upon the Draft Environmental Impact Report on the Beach Chalet Soccer Fields Project Proposal Issued on October 26, 2011

Dear Commissioners:

I write this letter as an individual who is also a member of the following groups: Planning Association for the Richmond; Coalition to Save Ocean Beach / Friends of Sutro Park; Friends of Lands End; and SFOceanEdge. I submit this letter as part of the public comment upon the above-referenced draft Environmental Impact Report dated October 26, 2011 re the Beach Chalet Soccer Fields Project ("DEIR") located in San Francisco's Golden Gate Park. The following are my comments, which I request to be considered for the final draft of the EIR:

1. This project should be considered at the same time you are considering a draft EIR for the San Francisco Public Utilities Commission's Tertiary Water Treatment Plant (with an enclosed Water Supplementation Pump) Project because of their interconnectedness in terms of cumulative environmental impact, cumulative construction impact, and anticipated aquifer impact (referenced below). 01
2. The plan requires many many tons of finely shredded used automotive tires to be dumped into the ground: there is no analysis of the impact of these particles on the water aquifers that lie underneath these fields. 02
3. The plan requires many many tons of finely shredded used automotive tires to be dumped into the ground: there is no analysis of the impact of these particles on the respiratory systems of the players. 03
4. The plan requires many many tons of finely shredded used automotive tires to be dumped into the ground: there is no analysis of the impact of these particles on the respiratory systems of area residents. 04
5. The plan requires many many tons of finely shredded used automotive tires to be dumped into the ground: there is no analysis of the impact of these particles on the health of the animals in the 04

ecosystem surrounding the fields.

↑  
04  
cont.

6. The plan requires many many tons of finely shredded used automotive tires to be dumped into the ground: there is no analysis of the impact of these particles on the environment when they must be removed at the end of their lifespan or the repurposing of the fields.

05

7. The plan requires many many tons of synthetic turf to form the synthetic surface of the soccer fields: there is no analysis of how local conditions (i.e., high humidity, high salinity, cool temperatures) will effect the anticipated lifespan of the synthetic surface.

06

8. The plan requires many many tons of synthetic turf to form the synthetic surface of the soccer fields: there is no analysis of how local conditions (i.e., high humidity, high salinity, cool temperatures) will effect the anticipated cost of regularly required replacement of the synthetic surface due to local conditions impacts upon the lifespan of the synthetic surface.

07

9. The plan requires many many tons of synthetic turf to form the synthetic surface of the soccer fields: there is no analysis of how local conditions (i.e., high humidity, high salinity, cool temperatures) will effect the anticipated lifespan degradation of the synthetic surface, and consequent impacts upon the water aquifers that lie underneath these fields.

08

10. The plan requires many many tons of synthetic turf to form the synthetic surface of the soccer fields: there is no analysis of how local conditions (i.e., high humidity, high salinity, cool temperatures) will effect the anticipated lifespan degradation of the synthetic surface, and consequent impacts upon the respiratory systems of the players.

09

11. The plan requires many many tons of synthetic turf to form the synthetic surface of the soccer fields: there is no analysis of how local conditions (i.e., high humidity, high salinity, cool temperatures) will effect the anticipated lifespan degradation of the synthetic surface, and consequent impacts upon the respiratory systems of area residents.

12. The plan requires many many tons of synthetic turf to form the synthetic surface of the soccer fields: there is no analysis of how local conditions (i.e., high humidity, high salinity, cool temperatures) will effect the anticipated lifespan degradation of the synthetic surface, and consequent impacts upon the health of the animals in the ecosystem surrounding the fields.

10

13. The plan requires many many tons of synthetic turf to form the synthetic surface of the soccer fields: there is no analysis of how local conditions (i.e., high humidity, high salinity, cool temperatures) will effect the anticipated disposal of the synthetic surface.

11

14. The plan requires the use of synthetic turf to form the synthetic surface of the soccer fields: there is no analysis of an increased risk of serious injury caused by synthetic turf versus natural turf.

12

15. The plan requires the use of synthetic turf to form the synthetic surface of the soccer fields: there is no analysis of an increased risk of skin injury caused by synthetic turf versus natural turf.

16. The General Plan of the City and County of San Francisco, Environmental Protection Policy 1.4 states: “Assure that all new development meets strict environmental quality standards and recognizes human needs: 1) In reviewing all proposed development for probable environmental impact, careful attention should be paid to upholding high environmental quality standards. Granted that growth provides new economic and social opportunities, uncontrolled growth can also seriously aggravate environmental deterioration. 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.” There is insufficient analysis in these specific regards.

13

17. The plan requires the installation of permanent lighting, additional seating, additional parking, additional ingress and egress, and additional amenities: there is no analysis of the risk of activities other than soccer taking place at the site.

18. The plan requires the installation of permanent lighting, additional seating, additional parking, additional ingress and egress, and additional amenities: there is no analysis of the impacts on the environment, transportation, and residents if activities other than soccer taking place at the site.

14

19. The plan requires the installation of permanent lighting, additional seating, additional parking, additional ingress and egress, and additional amenities: there is no analysis of the alternatives if activities other than soccer taking place at the site.

20. The plan anticipates increases in playing time of almost 50% per year over the current playing field hours: there is insufficient analysis of the increased level of traffic.

15

21. The plan anticipates increases in playing time of almost 50% per year over the current playing field hours: there must be a formalized Transportation Demand Management Plan addressing the issue of the increased level of traffic.

22. The plan requires an increase in the amount of development of this sylvan space: there is insufficient analysis of the direct and indirect development impact upon the habitat of birds, raptors, and special-status bats (the Beach Chalet Soccer Fields are located within an Urban Bird Refuge as defined by the City’s Bird-Safe Guidelines).

16

23. The plan requires the use of night-time lighting: there is insufficient analysis of the impact of night-time lighting upon the Pacific Flyway, the close proximity to the Pacific Ocean shoreline, the migratory corridors in the vicinity, interference with wildlife nursery sites (the Beach Chalet Soccer Fields are located within an Urban Bird Refuge as defined by the City’s Bird-Safe Guidelines).

17

24. The plan requires the use of night-time lighting and night-time soccer field use: there is insufficient analysis of the impact of combined night-time lighting and noise upon avian reproduction (the Beach Chalet Soccer Fields are located within an Urban Bird Refuge as



defined by the City's Bird-Safe Guidelines).

↑ 17  
cont.

25. The plan requires the use of night-time lighting and night-time soccer field use: there is insufficient analysis of the impact of combined night-time lighting and noise upon area use by special-status bats (the Beach Chalet Soccer Fields are located within an Urban Bird Refuge as defined by the City's Bird-Safe Guidelines).

18

26. The plan requires significant construction: there is insufficient analysis of the construction schedule and potential conflict with the bird nesting season (January 15th through August 15th).

19

27. The plan requires significant construction of permanent facilities: there is insufficient analysis regarding irreversible impact under CEQA.

20

28. The plan requires significant construction of permanent facilities: there is insufficient analysis regarding irreversible impact to the Golden Gate Park National Historic District.

21

29. The plan has a false premise, based upon a bait and switch, that it will offer more opportunity for youth soccer, when in fact a review of the increased playing time reveals that the present fields provide a full schedule of youth soccer activities, and the expanded playing time will essentially be for adults at night: there is insufficient analysis of the impact of adults being in the western end of Golden Gate Park at night and the risk of mayhem that might thereby ensue.

22

30. The plan requires a large development including a huge amount of artificial materials and artificial lighting to create a busy athletic complex in the western end of Golden Gate Park: the Golden Gate Park Master Plan expressly requires the western end of the park to be kept "pastoral" and "sylvan" and there is insufficient analysis of the proposal's complete conflict with the Master Plan.

23

31. The plan requires a large development including a huge amount of artificial materials and artificial lighting to create a busy athletic complex in the western end of Golden Gate Park: the Golden Gate Park Master Plan expressly requires the western end of the park to be kept "pastoral" and "sylvan" and there is insufficient analysis of the conflict with Master Plan due to the proposal's introduction of a huge amount of artificial materials.

32. Under the financial requirements of the plan, the City must pay over \$6 million now and set aside \$200,000/year for replacement costs of the artificial turf: there is insufficient analysis of the alternative in which the City uses the \$200,000/year monies to instead hire a full-time maintenance crew and entirely replace a grass field every other year.

24

33. Under the plan the grass fields will be destroyed at least in part due to issues concerning alleged gopher damage: there is insufficient analysis of alternatives to preventing gopher damage.

25

34. The plan requires numerous lighting towers providing nighttime lighting: there is insufficient analysis of the impact of this nighttime lighting on the Urban Night Skies Project.

26

- |   |    |
|---|----|
| 35. The plan requires numerous lighting towers providing nighttime lighting: there is insufficient analysis of the impact of this nighttime lighting on the residents who live in the area.   | 27 |
| 36. The plan requires numerous lighting towers providing nighttime lighting: there is insufficient analysis of the impact of this nighttime lighting on the residents who live above the area.  |    |
| 37. The plan requires numerous lighting towers providing nighttime lighting: there is insufficient analysis of the impact of this nighttime lighting on Sutro Heights Park which looks down on the area.  |    |
| 38. The plan requires numerous lighting towers providing nighttime lighting: there is insufficient analysis of the impact of this nighttime lighting on those who use the western end of Golden Gate Park.  |    |
| 39. The plan requires numerous lighting towers providing nighttime lighting: there is insufficient analysis of the impact of this nighttime lighting when taking into consideration the low marine fog layer that often envelopes the area.   |    |
| 40. The plan requires the construction of a large athletic complex: there is insufficient analysis of the volume and duration of noise coming from the large athletic complex and its impact upon Park visitors, Ocean Beach visitors, nearby residents, local wildlife, and migratory wildlife.  | 28 |
| 41. The plan requires payment for the fields: there is insufficient analysis of the impact on the added costs for youth soccer for use of the fields once these improvements have been created.   | 29 |
| 42. The plan requires the loss of trees and shrubs: there is insufficient analysis of the loss of trees and shrubs.   | 30 |
| 43. The plan requires the loss of trees and shrubs: there is insufficient categorization of the trees and shrubs that will be lost.   |    |
| 44. The plan requires the use of artificial surfaces: there is insufficient analysis as to the impact to the temperature in the local environment due to the use of large areas of artificial surfaces.   | 31 |
| 45. The plan requires the use of artificial surfaces: there is insufficient analysis as to the impact to the ability to play soccer on artificial surfaces when those surfaces are regularly saturated with condensation.   | 32 |
| 46. The plan refers to possible alternatives: there is insufficient analysis of these alternatives as they relate to each of the issues raised above.   | 33 |
| 47. The plan must include alternatives: there is insufficient analysis of City policy to encourage school playing-field facilities to be used during non-school hours (these facilities are located where the demand is, and using local school playing-fields develops community relationships). | 34 |

48. The plan will result in the increased use of Golden Gate Park: there is insufficient analysis of the alternative positive impact this large athletic center would have upon McLaren Park. 35
49. The plan will result in the increased use of Golden Gate Park: there is insufficient analysis of the impact this large athletic center will have upon the limited carrying capacity of Golden Gate Park. 36
50. Aesthetically, the western view of Golden Gate Park from Ocean Beach will be blighted by the reduction in trees and the installation of numerous tall artificial lighting poles and by the artificial lighting itself: there is insufficient analysis of this aesthetic impact. 37
51. The DEIR uses inferior simulated pictures of the fields, amenities, environmental impacts, and lighting: there is insufficient analysis of appropriately accurate simulations of these elements. 38
52. The DEIR states that a project goal is to provide a safe environment in the western end of Golden Gate Park: there is insufficient analysis as to any present lack of safety and there is insufficient analysis as to how the plan assures that the environment would be safer. 39
53. The DEIR states that a project goal is to bring more people into Golden Gate Park at night: there is insufficient analysis as to why this is a project goal. 40
54. The DEIR states that there will be more nighttime play, which will be by adult leagues: there is insufficient analysis of parking expansion to meet increased demands posed by adult players. 40

Thank you for your careful review and anticipated detailed analysis of each of these comments.

Sincerely,

Jason Jungreis  
527 47th Avenue  
San Francisco CA 94121  
415-750-0830

cc: Supervisor Eric Mar  
Supervisor Carmen Chu  
Mayor Ed Lee  
Don Lewis, Planning Department  
Dan Mauer, Parks and Rec Department



11/22/11

Dear Planning Commission,  
 City Supervisors, Mayor Lee,  
 & other San Francisco citizens,

I regret that I can't  
 attend the Dec. 1<sup>st</sup> hearing on  
 protecting Golden Gate Park.  
 Nor can I at this time, <sup>email</sup> because  
 my computer has betrayed  
 me, & I'm trying to bring it  
 back to justice... & life.

I implore you to not change  
 the beautiful environment of  
 Golden Gate Park, a <sup>potential</sup> travesty  
 to past, present, & future  
 generations. The planned  
 changes are not in keeping with  
 original intents of this spacious  
 & special local garden, which

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Serves the City, surrounding communities, & visitors from near & far.

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cont.

I'm not a Luddite, but there are aspects of San Francisco that should remain as designed. Upkeep? Of course. But destruction, never.

↑  
02

Please reconsider such a deleterious decision. Sincere thanks ~

Trish Kaspar  
San Mateo



Linda Avery /CTYPLN/SFGOV

12/06/2011 03:44 PM

To Don Lewis/CTYPLN/SFGOV@SFGOV, Sarah B  
Jones/CTYPLN/SFGOV@SFGOV, Bill  
Wycko/CTYPLN/SFGOV@SFGOV  
cc Patricia Gerber/CTYPLN/SFGOV@SFGOV

bcc

Subject Beach Chalet

*Linda D. Avery-Herbert*

Director of Commission Affairs  
SAN FRANCISCO PLANNING COMMISSION &  
SAN FRANCISCO HISTORIC PRESERVATION COMMISSION  
1650 MISSION STREET – SUITE 400  
SAN FRANCISCO, CA 94103-2414  
TEL: 415.558.6407 – FAX: 415.558.6409  
WEBSITE: [www.sfgov.org/planning](http://www.sfgov.org/planning)

----- Forwarded by Linda Avery/CTYPLN/SFGOV on 12/06/2011 03:44 PM -----



gabbler@aol.com

12/06/2011 03:07 PM

To c\_olague@yahoo.com, rm@well.com,  
wordweaver21@aol.com, plangsf@gmail.com,  
mooreurban@aol.com, hs.commish@yahoo.com,  
rodney@waxmuseum.com  
cc linda.avery@sfgov.org

Subject

Honorable President Olague and members of the Planning Commission,

My name is Noel Kaufman. I am a 25-year resident of San Francisco and the father of two active teenagers, both of whom play on competitive soccer teams (my son both in high school and on a traveling club team, and my daughter on a traveling club team). In my younger years, I played competitive club level ultimate frisbee and practiced weekly on fields within Golden Gate Park when field conditions would allow. Over the years, I have had the opportunity to play and/or watch sporting events on almost every available public field in the city of San Francisco, from Youngblood Coleman to the Beach Chalet. I know all too well the paucity of playing fields for our children, no to mention active adults. It's like entering an entirely different universe to travel anywhere outside of the city and see the quality and number of fields available to children and adults in all of the communities that surround us.

01

I'm writing today to urge you to approve the draft environmental impact report (which I have read in its entirety) for the Beach Chalet field renovations with the hope that that project can be started as soon as possible. That might not be soon enough for my son, who will graduate from high school next year and perhaps leave for college having attended a school that has no home field on which to play its games. But perhaps my daughter might be able to play on the fields before she too leaves home.

As I mentioned before I read the DEIR, and think it was correct to require that such a document be prepared so that a more objective perspective could be brought to bear on a project that has created a bit of controversy within the community. Having read the document, which I think is quite thorough and complete, I see no reason to further delay this project. While it is true that a natural resource will be lost in Golden Gate Park as a result of the renovation, the resulting changes will be a huge boon to the city as has been the case with the renovations at Crocker Amazon, Silver Terrace, and elsewhere. The benefits far outweigh the costs. The city needs more fields that are durable. Of that, there can be no doubt. This is a project that can provide those fields.

02



I respectfully request that you approve the DEIR and allow this project to move on to the next phase so that it can be approved and begun.

Thanks for your time.

Sincerely,

Noel Kaufman  
Alabama Street  
San Francisco, CA

**From:** [Bruceprt2005@comcast.net](mailto:Bruceprt2005@comcast.net) [mailto:[Bruceprt2005@comcast.net](mailto:Bruceprt2005@comcast.net)]

**Sent:** Saturday, December 10, 2011 11:48 AM

**To:** [bill.wyko@sfgov.org](mailto:bill.wyko@sfgov.org)

**Cc:** [sfoceanedge@earthlink.net](mailto:sfoceanedge@earthlink.net)

**Subject:** BEACH CHALET ATHLETIC FIELD RENOVATION

Dear Mr. Wycko:

I oppose the renovation of the soccer fields using artificial turf and installing lights for night games.

Please use natural grass for people to enjoy during daylight hours and use the money saved to renovate playing fields outside the park.

01

Sincerely

Bruce Keegan

43 Keystone Way

San Francisco 94127



Bill Wycko/CTYPLN/SFGOV  
12/08/2011 09:46 AM

To Don Lewis/CTYPLN/SFGOV@SFGOV, Sarah B  
Jones/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: NO astroturf or water treatment plant in Golden Gate  
Park

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 12/08/2011 09:47 AM -----



janet kessler  
<jannyck@aol.com>  
12/07/2011 08:59 PM

To bill.wycko@sfgov.org

cc

Subject NO astroturf or water treatment plant in Golden Gate Park

Mr. Bill Wycko  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

Dear Mr. Wycko --

I am a long term resident of San Francisco.

I am opposed to building a soccer field with astroturf and a huge light structure in the western end of Golden Gate Park, and I am also opposed to the water treatment plant which is planned for that same area of the park. Please let's allow the wilderness, trees and a natural field to prevail in this area. Your downgrading it to astroturf goes against all of our progressive San Francisco values.

I was a soccer mom for my two children for many years. We used those same fields -- grass -- and felt that our kids were in the real out-of-doors. Concrete it over -- which is what astroturf would be doing -- and you remove the kids one more step from the reality of the natural earth. Instead you hand them a petro-product to play on. Aren't we trying to remain "green"? Aren't we trying to get away from petroproducts? Grass works fine -- there is no need to change it. Turning to astroturf or a similar product would hurt the environment in so many ways. We are losing more and more of our "real" out of doors. I think it is incumbent on those running our government to listen to the great opposition that has been expressed towards this project.

Also the water treatment plant should not be put on our parkland. Our parkland has been set aside for the use of the citizens, as a place of respite from what is often a hectic urban environment. Please leave the park for what it was intended, not for buildings.

One of my primary concerns is for the wildlife in the area. I am a wildlife photographer and spend two to four hours a day in the wild parts of our parks. The animals need these

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areas left alone. If you cover the land and build on it, take down more trees, and bring in more people, you will be disrupting the haven that exists there now: birds, raccoons, hawks, bats, coyotes. The few wild parts of our parks which remain need to be preserved for the wildlife which now lives there. We are supposed to be sharing the earth with them, but a plastic soccer field and a water treatment plant would take over this area for single use purposes.

↑  
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cont.

Please do not allow astroturf or the overwhelming lighting structures to be used in this wild part of our park. Please do not allow a water treatment plant to be built on our parkland.

Sincerely, Janet Kessler

[www.urbanwildness.com](http://www.urbanwildness.com)

**From:** Tehmina Khan <teatime4pm@gmail.com>  
**To:** bill.wycko@sfgov.org, don.lewis@sfgov.org  
**cc:** sfoceanedge@earthlink.net

---

**Date:** Sunday, December 11, 2011 09:40PM  
**Subject:** Beach Chalet Athletic Fields Renovation

---

Tehmina Khan  
178 Wool Street  
San Francisco, CA 94110

December 10, 2011

Mr. Bill Wycko  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission St. Room 400  
San Francisco, CA 94103

**Subject: BEACH CHALET ATHLETIC FIELDS  
RENOVATION**  
Draft Environmental Impact Report  
Planning Department Case No. 2010.0016E  
State Clearinghouse No. 2011022005

Dear Mr. Wycko,

I am a San Francisco soccer mom and I oppose the proposal to renovate the Beach Chalet Athletic Fields with artificial turf and stadium lights. My son and his teammates prefer to play on natural grass, yet they have little opportunity to do so as many former grass fields are paved over with turf. Along with the other team parents I have serious concerns about the impact of turf on our children's health and safety. The tire crumbs in turf contain numerous toxins, including carcinogens and heavy

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metals, and they often end up in our children's hair, clothes, and shoes, as well as in the mouths of younger siblings. Furthermore, even in mild San Francisco heat, the artificial surface becomes too hot to touch with bare feet and gives off a chemical smell. I worry about the long term effects of breathing these chemicals, especially on children.

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cont.

As a family, we enjoy the grassy meadows of Golden Gate Park, especially the western end so close to the beach. We love that we can wander, play, and watch birds and bugs. When there are so few wild spaces left in the city, to pave over seven acres of natural meadows and cover them with synthetic, toxic surfacing would be nothing short of a tragedy. For these reasons among others, I support the Compromise Alternative put forth by the public during the Planning Commission hearing of December 1<sup>st</sup>, 2011. The Compromise Alternative is to renovate the Beach Chalet fields with natural grass and no lighting and to renovate the West Sunset Playground to provide more hours of play for youth soccer. I urge the Planning Department to focus on this alternative and work to find a solution that protects Golden Gate Park's parkland.

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I agree with the DEIR finding that the proposed project will materially impair in an adverse manner many of the character defining features of the Beach Chalet Athletic Fields. However, in all other areas, I find the Draft Environmental Impact Report to be deeply flawed. I request that the following areas be explored further:

#### Aesthetics:

- Both during the day and at night, show two simulations for each view. One is to show the amount of light and darkness currently in this area. The Second is to show, in the full dark, all lighting,

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including the proposed stadium lights at the highest amount of lighting planned for the Beach Chalet fields and all proposed parking and pedestrian lighting:

- From Ocean Beach due west and south west of the project area, looking back to Golden Gate Park and the area of the Beach Chalet Athletic fields;
  - From the Great Highway Promenade immediately across from the Beach Chalet, looking back to Golden Gate Park and the Beach Chalet Athletic Fields;
  - From the road up to the Cliff house, looking down to the beach and to the Beach Chalet Athletic Fields.
  - From the railroad path due west of the center of the Beach Chalet fields, looking at the project area.
- Show also the change in light on the path area from the current darkness to the fully lighting project.

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cont.

#### Cultural Resources:

- The Myoporum trees are still called "shrubs" - why are 30 foot trees called shrubs? What is the basis for this classification? Quote the arboriculture standard that substantiates this designation.
- The DEIR says RPD can change the circulation paths to decomposed granite (DG) and make them more curvilinear; but ADA in San Francisco won't accept DG. What materials does RPD propose to use? What will these paths look like? Provide an illustration.
- Why are there so many paved paths in a park that is supposed to be naturalistic parkland?
- In addition to the stadium lighting, there will be lighting for paths and lighting for parking also - what will be the cumulative impact on this "wild" end of the Park for people? What will be the cumulative impact for wildlife?
- This report ignores the fields as part of the larger part of GGP; What percent of the total meadows in the park is the Beach Chalet project?
- The DEIR ignores the cumulative impact of the fields and the Westside Water Treatment Plant. The two projects together form a barrier that is over 50% of

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the width of the Park - why does the DEIR ignore this? What is the impact on the overall design and experience of the park for visitors, if these two projects are built?

- o Explain why the DEIR ignores the Golden Gate Park Master Plan when it calls the western end of the Park the more wild and forested area.
- o Explain why the DEIR ignores the cumulative loss of trees with the two projects. What is the total number that will be lost and threatened by these two projects? What will be the cumulative impact on the western windbreak of the park?

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#### Traffic and circulation:

- o Rec and Park has talked of closing the Park at night -- how will this impact traffic in this area?
- o How will having large crowds in this area impact Rec and Park trying to close the Park at night?
- o What happens to people who take a bus to a game -- where does the public get off the bus? How far do they walk? What paths will they follow?
- o What is the impact on the Ocean Beach parking lot of large games at the soccer complex?
- o What is the cumulative impact of events such as soccer tournaments, sand castle contests, surfing contests, major runs, Bay to Breakers, or even just a sunny day -- on traffic in this area?
- o Expand the traffic study to include the above factors. Study all of the events over the past 2 years that took place in Golden Gate Park and the increased traffic for the soccer matches. Give totals for all events and where the parking takes place. Analyze the impact on Golden Gate Park, on Ocean Beach, and on the surrounding neighborhoods. Include increased attendance at events such as the Outside Lands Festival and the Bluegrass Festival, which have increase in attendance over the years.
- o What will be the impact on the new bicycle lane that goes by the newly enlarged parking lot entrance?

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## Recreation

- What level of maintenance will be required with the new artificial turf fields? What kinds of activities will be included in this maintenance, and how many hours will be spent on each activity? 16
- What level of maintenance will be required if natural grass is planted at Beach Chalet? What kinds of activities and how many hours will be spent on each activity?
- Please give the same information for the West Sunset Playing fields - -how will this change between the current natural grass and if it has artificial turf? 17
- How will maintenance be handled with more traffic and higher use of the area?
- What will be the new, compared to the prior, custodian hours? How will this be financed?
- The DEIR says that the new project will result in clean restrooms --what is the correlation between artificial turf and clean restrooms? What is the correlation between night time stadium lighting and more usage, and clean restrooms? Why can't RPD clean up the bathrooms without spending \$9.6 million on artificial turf and night lighting? 18

I would also like to receive a printed copy of the Comments and Responses and the Final EIR by mail.

Please let me know that you have received this letter.

Sincerely,

Tehmina Khan





Bill Wycko/CTYPLN/SFGOV  
12/07/2011 11:20 AM

To Don Lewis/CTYPLN/SFGOV@SFGOV, Sarah B  
Jones/CTYPLN/SFGOV@SFGOV  
cc  
bcc  
Subject Fw: Beach Chalet

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 12/07/2011 11:20 AM -----



Noel kirshenbaum  
<nwkirshenbaum@gmail.com  
>  
12/06/2011 04:34 PM

To bill.wycko@sfgov.org  
cc  
Subject Beach Chalet

Dear Mr. Wycko

I write you as a native San Francisco who is, with his family, very concerned about the Beach Chalet project. We emphatically oppose this project for many reasons, certainly including those relating to the environmental consequences. However, probably

unlike most other opponents, one of our concerns is financial.

Specifically, our discomfort with the project concerns the cost of its implementation. At a time when the City of San Francisco is striving to keep expenditures within bounds, an unnecessary project of this nature is contrary to reason. Artificial turf is not only contradictory to the natural environment harmonious to Golden Gate Park, but it is a considerable -- and unnecessary expense. Moreover, not only is the proposed lighting system inimical to the site's natural surroundings, but the lighting is obviously a very costly outlay which appears wasteful and extravagant under the circumstances of the time.

Noel W. Kirshenbaum  
2518 Gough Street  
San Francisco 94123

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December 12, 2011

The Honorable Christina Olague  
President  
San Francisco Planning Commission  
1650 Mission Street  
Fourth Floor  
San Francisco, CA 94102

**RECEIVED**  
DEC 12 2011  
CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
RECEPTION DESK

Re: Beach Chalet Athletic Fields, Case No. 2101.0016E

Dear Commissioner Olague, et al.:

In conjunction with the nine associations that have requested an extension of the Comment Period in the above-captioned case, as well as the numerous individuals who made oral requests at the Planning Commission hearing on December 1st, I hereby submit my request that you extend the comment period for 60 days beyond the current closing date of December 12, 2011.

The nine associations include many affected neighborhood groups from the Richmond, from the Sunset district and from Sutro Heights, among others. Other groups requesting an extension include such well-established associations as the Northern California Audubon Society and the Sierra Club.

The Draft EIR in this case runs 284 pages, not counting the numerous cross referenced reports, articles, books, orders and permits. (See Appendix A for list of 72 relevant reports and articles cited.)

San Francisco Planning Commission  
December 12, 2011  
Page 2

Surely commentators should be given more time to review the extensive literature cited in the DEIR.

In particular, I would like the time to review closely the Task Force report on hazardous materials, including water contaminants, cited at page IV.G-4, footnote 10 of the DEIR, which was prepared under the aegis of the Recreation and Park Commission. This report apparently cites 27 studies of hazardous materials, yet only five of those studies are discussed in the DEIR. No explanation was offered for their selection. (See discussion of Table IV.G-1, Summary of Literature review, at pages IV.G-6 through IV.G-10.)

Although this Task Force included many distinguished members from a number of agencies, the Recreation and Parks Department has a well-known reputation for skewing numbers and facts, so it will be important to analyze the Task Force report independently.

Due to the number of considerations at issue (impact on wildlife, change of a natural setting into a virtual sports arena, potential water contamination, etc.), as well as the sheer volume of the material covered by the DEIR, the public needs additional time to review the draft EIR.

After all, the Planning Department took almost nine full months (February 2nd through October 26th) to produce this document. The public should be given a reasonable amount of time to review and digest its contents.

Sincerely yours,

  
Marilyn Kohn

Appendix A, attached



## APPENDIX A

### Reports and articles\* cited in the DEIR that are available either in the case file at the Planning Department offices or on-line.

1. Trust for Public Land, Center for City Park Excellence. *2010 City Park Facts*, online at [http://cloud/tpl.org/pubs/ccpe\\_CityParkFacts\\_2010/pdf](http://cloud/tpl.org/pubs/ccpe_CityParkFacts_2010/pdf). Cited in DEIR at page II-9, footnote 3, and at page IV.A-2, footnote 1.
2. City and County of San Francisco. *General Plan, 1988*, as amended through 2009, online at [http://www.sf-planning.org/ftp/General\\_Plan/index.htm](http://www.sf-planning.org/ftp/General_Plan/index.htm). Cited in the DEIR at page III-2, footnote 1.
3. City and County of San Francisco. *Sustainability Plan for the City of San Francisco, 1997*, online at [http://www.sfenvironment.org/downloads/library/sustainability\\_plan.pdf](http://www.sfenvironment.org/downloads/library/sustainability_plan.pdf). Cited in the DEIR at page III-5, footnote 2.
4. San Francisco Recreation and Parks Department. *Golden Gate Park Master Plan, 1998*, online at <http://sfrecpark.org/GGMasterPlan.aspx>. Cited in the DEIR at page III-7, footnote 3 and *passim*. Page IV.A-2, footnotes 2 and 3. Page IV.E-10, footnote 20. Page IV.F-2, footnote 4.
5. National Park Service. *Management Policies 2006*, online at <http://www.nps.gov/policy/mp2006.pdf>. Cited in the DEIR at page III-10, footnote 9.

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\* Only those reports relevant to the issues to be challenged, e.g. wildlife impact, water contamination and destruction of natural setting, are listed. The total number of reports approaches 100.



6. Musco Lighting. Illumination Summary, January 29, 2010 and April 28, 2010. Cited in the DEIR at page IV.B-37, footnote 7.
7. ESA. *Beach Chalet Athletic Fields Renovation Project, City and County of San Francisco, Final Historic Resources Evaluation*, July, 2011. Cited in the DEIR at page IV.C-1, footnote 2.
8. San Francisco Planning Department Memorandum. *Historic Resources Evaluation Response, Beach Chalet Athletic Fields Renovation Project*, July 27, 2011. Cited in the DEIR, at page IV.C-2, footnote 3.
9. Wilson, Ihrig & Associates, Inc. *Crystal Springs Pipeline No. 2 Noise and Vibration Study, Impacts and mitigation Technical Memo*, February 2009. Cited in the DEIR, at page IV.C-2, footnote 4.
10. United States Department of the Interior National Park Service, National Register of Historic Places Registration form. *Golden Gate Park*, October 2004. Cited in the DEIR at page IV.C-3, footnote 5.
11. Christopher Pollock. *San Francisco's Golden Gate Park: A Thousand and Seventeen Acres of Stories*. Graphic Arts Center Publishing Co, 2001. Cited by the DEIR at page IV.C-9, footnote 11.
12. Cate Blanton and Mary Nelson. *Chalet Recreation Field at Golden Gate Park (Beach Chalet Athletic Fields, HALS No. CA-49-A.) Historic American Landscapes Survey Inventory Form*, January 2011. Cited in the DEIR at page IV.C-10, footnote 14.

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\* Only those reports relevant to the issues to be challenged, e.g. wildlife impact, water contamination and destruction of natural setting, are listed. The total number of reports approaches 100.

13. Environmental Science Associates. *Beach Chalet Athletic Fields Renovation Project Transportation Impact Study*, 2011. Cited in the DEIR at page IV.D-1, footnote 1.
14. San Francisco Planning Department. Amended by Resolution 16942, 2/3/2005. *San Francisco General Plan: Transportation Element*, online at [http://www.sf-planning.org/frp/General\\_Plan/14\\_Transportation.htm](http://www.sf-planning.org/frp/General_Plan/14_Transportation.htm) Cited in the DEIR at page IV.D-1, footnote 2.
15. Golden Gate National Parks conservancy. 2010 Ocean Beach, online at <http://parksconservancy.org/visit/park-sites/ocean-beach.html> . Cited in DEIR at page IV.E-2, footnote 3.
16. Western Neighborhoods Project website, online at [http://www.outsidelands.org/murphy\\_windmill.php](http://www.outsidelands.org/murphy_windmill.php). Cited in DEIR at page IV.E-3, footnote 8.
17. California Natural Diversity Data Base, Rarefind 3, 2011 (Online ineventory of rare and endangered plants, at <http://cnps.web.aplus.net/cgi-bin/inv/inventory.cgi>. Cited in DEIR at page IV.F-1, footnote 1.
18. Official List of Federal Endangered and Threatened Species that Occur in or may be Affected by Projects in San Francisco North and the San Francisco South USGS 7.5 Minute Quadrangles, Document No. 11041402353. Cited in DEIR at page IV.F-1, footnote 1.
19. Robert F. Holland. *Preliminary Descriptions of Terrestrial Natural Communities in California*. 1986. Cited in DEIR at page IV.F-2, footnote 5.

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\* Only those reports relevant to the issues to be challenged, e.g. wildlife impact, water contamination and destruction of natural setting, are listed. The total number of reports approaches 100.



20. HorScience, Inc. *Tree and Large Shrub Report: Golden Gate Park Soccer Fields*, 2010.  
Cited in DEIR at page IV.F-5, footnote 7.
21. B.A. Garrison. Bank Swallow (*Riparia riparia*). In *The Riparian Bird Conservation Plan: a strategy for reversing the decline of riparian-associated birds in California*, 1998, online at [http://www.prbo.org/calpif/html/docs/riparian\\_v-2.html](http://www.prbo.org/calpif/html/docs/riparian_v-2.html)  
Cited in DEIR at page IV.F-8, footnote 13.
22. J. K. Krauel. *Foraging Ecology of Bats in San Francisco*, 2009. M. S. Thesis, San Francisco State.  
Cited in DEIR at page IV.F-15.
23. D. A. Sibley. *A Sibley Guide to Bird Life and Behavior*, 2001.  
Cited in DEIR at page IV.F-16, footnote 15.
24. San Francisco Field Ornithologists. *San Francisco Breeding Bird Atlas, 2001-2003*, online at <http://www.sffo.org>.  
Cited in DEIR at page IV.F-16, footnote 15.
25. Western Bat Working Group. Species Description for *Tadaridia brasiliensis mexicana*, Mexican free-tailed bat, 2005, online at [http://www.wbwg.org/speciesinfo/species\\_accounts/molossidae/tabr.pdf](http://www.wbwg.org/speciesinfo/species_accounts/molossidae/tabr.pdf).  
Cited in DEIR at page IV.F-17, footnote 22.
26. J. Morlan. Bird lists for various sites in Golden Gate Park and nearby sites, online at <http://fog/ccsf.cc.ca.us/~jmorlan/spr00lists.htm> and <http://fog/ccsf.cc.ca.us/~jmorlan/fall99lists.htm> .  
Cited in DEIR at page IV.F-1i, footnote 23.

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\* Only those reports relevant to the issues to be challenged, e.g. wildlife impact, water contamination and destruction of natural setting, are listed. The total number of reports approaches 100.

27. J. Clark. Birds on San Francisco's GGP West end Soccer Fields, 2009. Cited in DEIR at page IV.F-1i, footnote 24.
28. May & Associates. Biological Resource Assessment Report: City and County of San Francisco's Beach Chalet Soccer Field Improvement Project, 2010. page IV.F-1i, footnote 24.
29. Cornell Lab of Ornithology. Migration Pathways, 2007, online at <http://www.birds.cornell.edu/AllAboutBird/studying/migration/pathways>. Cited in DEIR at page IV.F-26m, footnote 33.
30. L. E. Ogden. Collision Course: The Hazards of Lighted Structures and Windows to Migrating Birds, Special Report for the World Wildlife Fund and the Fatal Light Awareness Program, 1996, online at [www.flap.org](http://www.flap.org).
31. F. J. Verheijen. Bird kills at lighted man-made structures: not on nights close to a full moon, 1981. *American Birds* 35 (3): 251-254. Cited in DEIR at page IV.F-27, footnote, 40.
32. S. A. Gauthreaux and C. G. Belser. Effects of Artificial Night Lighting on Migrating Birds, 2006. In C. Rich and T. Longcore, *Ecological Consequences of Night Lighting*. Cited in DEIR at page IV.F-27, footnote 41.
33. W. R. Evans, et al. "Response of night-migrating songbirds in cloud to colored and flashing light," *North American Birds*, 60 (4), 476-88, 2007. Cited in DEIR at page IV.F-27, footnote 42.
34. R. Reijnen and R. Foppen. "The effects of car traffic on breeding bird population in woodland." *Journal of Applied Ecology*, 32, pp. 85-94, 1995. Cited in DEIR at page IV.F-30, footnote 52.

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\* Only those reports relevant to the issues to be challenged, e.g. wildlife impact, water contamination and destruction of natural setting, are listed. The total number of reports approaches 100.



35. D. H. Ellis, et al. "Raptor Responses to Low-level Jet Aircraft and Sonic Booms," *Environmental Pollution* 74: 53-83, 1981. Cited in DEIR at page IV.F-30, footnote 53.
36. J. R. Jehl and C. F. Cooper, eds. Potential Effects of Space Shuttle Booms on the Biota and Geology of the Channel Islands: Research Reports. Center for Marine Studies, San Diego State University, 1980. Cited in DEIR at page IV.F-30, footnote 55.
37. D. K. Delaney, et al. "Effects of Helicopter Noise on Mexican Spotted Owls," *Journal of Wildlife Management* 63, pp. 60-76, 1999. Cited in DEIR at page IV.F-30, footnote 57.
38. E. W. West, et al. "Noise Impacts on Birds: Assessing Take of Endangered Species," *The Journal of the Acoustical Society of America*, 122(5), p. 3082, 2007. Cited in DEIR at page IV.F-30, footnote 58.
39. Robert J. Dooling and Arthur N. Poppper. The Effects of Highway Noise on Birds, prepared, prepared for CALTRANS, 2007, online at [http://www.dot.ca.gov/hq/env/bio/files/caltrans\\_birds\\_10-7-2007b.pdf](http://www.dot.ca.gov/hq/env/bio/files/caltrans_birds_10-7-2007b.pdf). Cited in DEIR at page IV.F-30, footnote 59.
40. San Francisco Public Utilities Commission. *Wastewater System Reliability Assessment, Baseline Summary Report Draft*, 2003. Cited in DEIR at page IV.G-1, footnote 1.
41. San Francisco Public Utilities Commission. *Southwest Ocean Outfall Regional Monitoring Program, Eight-year Summary Report, 1997 – 2004*. Cited in DEIR at page IV.G-2, footnote 4.

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\* Only those reports relevant to the issues to be challenged, e.g. wildlife impact, water contamination and destruction of natural setting, are listed. The total number of reports approaches 100.



42. San Francisco Public Utilities Commission. *Wastewater System Reliability Assessment, Summary Report, Draft*, December 2003. Cited in DEIR at page IV.G-3, footnote 7.
43. Department of Water Resources. *San Francisco Bay Hydrologic Region, Westside Groundwater Basin, California's Groundwater, Bulletin 118*, updated January 2006. Cited in DEIR at page IV.G-3, footnote 8.
44. San Francisco Recreation and Park Department. *Draft Synthetic Playing Fields Task Force Findings and Department Recommendations, Report to San Francisco Recreation and Parks Commission*, July 28, 2010, online at [http://sf-recpark.org/ftp/uploadedfiles/wcm\\_recpark/SPTF/SPTFDR072508.pdf](http://sf-recpark.org/ftp/uploadedfiles/wcm_recpark/SPTF/SPTFDR072508.pdf). Cited in DEIR at page IV.H-5, footnote 6.
45. Integrated Waste Management Board. *Evaluation of Health Effects of Recycled Waste Tires in Playground and Track Products*, 2007. Cited in DEIR at page IV.G-6, footnote 11.
46. Robert Moretto. Environmental and Health Assessment of the Use of Elastomer Granulates (Virgin and from Used Tyres) as Filling in Third-generation Artificial Turf, 2007. Cited in DEIR at page IV.G-8, footnote 12.
47. New York State Department of Conservation, New York State Department of Health. *An Assessment of Chemical Leaching, Releases to Air and Temperature at Crumb-Rubber Infilled Synthetic Turf Fields*, May 2009. Cited in DEIR at page IV.G-9, footnote 13.
48. Connecticut Agricultural Experimental Station. *2009 Study of Crumb Rubber Derived from Recycled Tires, Final Report*, rev. May 4, 2010. Cited in DEIR at page IV.G-9, footnote 15.

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\* Only those reports relevant to the issues to be challenged, e.g. wildlife impact, water contamination and destruction of natural setting, are listed. The total number of reports approaches 100.

49. Connecticut Department of Environmental Protection. *Artificial Turf Study, Leachate and Stormwater Characteristics, Final Report*, July 2010. Cited in DEIR at page IV.G-9, footnote 16.
50. San Francisco Public Utilities Commission. *Synthetic Turf Stormwater Quality Monitoring Plan*, February 2, 2010. Cited in DEIR at page IV.G-10, footnote 18.
51. City and County of San Francisco, Recreation and Park Department, *Synthetic Turf Standards Information Only*, July 8, 2009, online at <http://www.scparks.com/pdfs/Synthetic%20Turf%20Standards.pdf> . Cited in DEIR at page IV.G-16, footnote 20.
52. California Regional Water Quality Control Board. *San Francisco Bay Region, San Francisco Bay (Region 2) Water Quality Control Plan (Basin Plan)*, incorporating all approved amendments as of Decemer 21, 2010. Cited in DEIR at page IV.G-18, footnote 21.
53. State Water Resources control Board. *Water Quality Control Plan, Ocean Waters of California, California Ocean Plan*, 2005, online at [http://www.swrcb.ca.gov/water\\_issues/programs/ocean/docs/oplans/oceanplan2005.pdf](http://www.swrcb.ca.gov/water_issues/programs/ocean/docs/oplans/oceanplan2005.pdf). Cited in DEIR at page IV.G-18, footnote 22.
54. United States Environmental Protection Agency . National Recommended Water Quality Criteria Table, Fact Sheet, May 2005. Cited in DEIR at page IV.G-18, footnote 23.

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\* Only those reports relevant to the issues to be challenged, e.g. wildlife impact, water contamination and destruction of natural setting, are listed. The total number of reports approaches 100.

55. San Francisco Public Utilities Commission and Port of San Francisco. San Francisco Stormwater Design Guidelines, November 2009, online at <http://sfwater.org/index.aspx?page=466>  
Cited in DEIR at page IV.G-21, footnote 25.
56. California Regional Water Quality Control Board, San Francisco Bay Region. *Screening for Environmental Concerns at Sites with Contaminated Soil and Groundwater*, November 2007 (Revised May 2008). Cited in DEIR at page IV.G-23, footnote 26.
57. HydroConsult Engineers, *Westside Model documentation*, July 2001. Cited in DEIR at page IV.G-28, footnote 28.
58. HydroConsult Engineers, *Hydrology Study, Beach Chalet*, August 2011. Cited in DEIR at page IV.G-28, footnote 29.
59. Integrated Waste management Board. *Evaluation of Health Effects of Recycled Waste Tires in Playgrounds and Track Products*, January 2007, online at <http://www.calrecycle.ca.gov/publications/Tires/62206013.pdf> . Cited in DEIR at page IV.H-2, footnote 1.
60. Bay Area Quality Management District. *BAAQMD CEQA Guidelines, Assessing the Air Quality Impacts of Projects and Plans*, updated June 2010, online at [http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/CEQA/BAAQMD/%20CEQA%20Guidelines December%202010.aspx](http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/CEQA/BAAQMD/%20CEQA%20Guidelines%20December%202010.aspx) . Cited in DEIR at page IV.H-3, footnote 3.

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\* Only those reports relevant to the issues to be challenged, e.g. wildlife impact, water contamination and destruction of natural setting, are listed. The total number of reports approaches 100.



61. City and County of San Francisco, Department of Public Health, Environmental Health Section. *Memo to Dawn Kamalanath, Planning director, San Francisco Department of Recreation and Parks re Artificial Turf Products*, February 6, 2008. Cited in DEIR at page IV.H-5, footnote 5.
62. Office of Environmental Health Hazard Assessment. *Chemicals and Particulates in the Air Above New Generation of Artificial Turf Playing Fields, and Artificial Turf as a Risk Factor for Infectyion by Methicillin-Resistant Staphylococcus Aureus (MRSA), Literature Review and Data Gap Identification*, July 2009, online at <http://www.calrecycle.ca.gov/Tires/Products/BizAssist/Health/TurfStudy/LitReview.doc>. Cited in DEIR at page IV.H-10, footnote 8.
63. California Department of Resources Recycling and Recovery. *Safety of Artificial Turf Containing Crumb Rubber Infill Made from Recycled Tires: Measurements of Chemicals and Particulates in the Air, Bacteria in the Turf, and Skin Abrasions Caused by Contact with the Surface*, October 2010, online at <http://www.sfrecpark.org/documents/item12PlayfieldsInitiativeUpdateAttachmentOEHHASStudy022011.pdf> . Cited in DEIR at page IV.H-11, footnote 9.
64. University of Connecticut Health Center. *Artificial Turf Field Investigation in Connecticut, Finaly Report*, July 27, 2010. Cited in DEIR at page IV.H-13, footnote 11.
65. Connecticut Department of Public Health. *Human Health Risk Assessment of Artificial Turf Fields Based Upon Results from Five Fields in Connecticut*, July 28, 2010. Cited in DEIR at page IV.H-13, footnote 12.

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\* Only those reports relevant to the issues to be challenged, e.g. wildlife impact, water contamination and destruction of natural setting, are listed. The total number of reports approaches 100.



66. Connecticut Agricultural Experimental Station. Study of Crumb Rubber Derived from Recycled Tires, Final Report, revised May 4, 2010. Cited in DEIR at page IV.H-13, footnote 13.
67. Connecticut Department of Environmental Protection, Artificial Turf Study, Leachate and Stormwater Characteristics, Final Report, July 2010. Cited in DEIR at page IV.H-13, footnote 14.
68. Connecticut Academy of Science and Engineering. *Committee Report: Peer Review of an Evaluation of the Health and Environmental Impacts Associated with Synthetic Turf Playing Fields*, June 13, 2010. Cited in DEIR at page IV.H-13, footnote 15.
69. Winward Environmental LLC. Initial Evaluation of Potential Human Health Risks Associated with Playing on Synthetic Turf Fields on Bainbridge Island. Cited in DEIR at page IV.H-14, footnote 16.
70. Envirosurvey, Inc. *Lead and Asbestos Survey, Beach Chalet Soccer Field Restroom*, May 11, 2010. Cited in DEIR at page IV.H-22, footnote 27.
71. California Environmental Protection Agency. *Use of California Human Health Screening Levels (CHHSLs) in Evaluation of Contaminated Properties*, January 2005. Cited in DEIR at page IV.H-23, footnote 29.
72. California Environmental Protection Agency. Revised California Human Health Screening Level for Lead, May 14, 2009. Cited in DEIR at page IV.H-23, footnote 30.

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\* Only those reports relevant to the issues to be challenged, e.g. wildlife impact, water contamination and destruction of natural setting, are listed. The total number of reports approaches 100.

December 12, 2011

The Honorable Christina Olague  
President  
San Francisco Planning Commission  
1650 Mission Street  
Fourth Floor  
San Francisco, CA 94102

**RECEIVED**  
DEC 12 2011  
CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
RECEPTION DESK

Re: Beach Chalet Athletic Fields, Case No. 2101.0016E

Dear Commissioner Olague, et al.:

I have begun to prepare a petition for writ of mandate to challenge the draft EIR prepared by the City Planning Department in connection with the proposed renovation of the Beach Chalet soccer fields. This writ will not only be challenging the adequacy of the draft EIR, it will be requesting the court to order the preparation of a new EIR by a reputable, outside, independent contractor.

I had not even completed the Executive Summary of this document before I realized that it is wholly biased and result-driven. Further reading of the DEIR only re-enforced this initial impression. Whatever occurred behind the scenes to produce such a flawed draft EIR, it is clear that the Planning Department is not capable producing a reasoned analysis of this project. The review process must be simply taken out of their hands.

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I am not the only critic to have noted the "bias," "tunnel-vision" and "uncritical acceptance of the sponsor's objectives" of this draft EIR. (Cf. Comments filed by Rupert Clayton, Greg Miller.) Indeed, the drafter's bias fairly leaps off the page.

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cont.

In sum, the DEIR comes to the astonishing conclusion that the **only** substantial adverse impact of the proposed project is the change in significance of a historical resource. Through faulty analysis, invalid premises and specious conclusions, not to speak of carefully chosen locations from which all photographs were taken, the drafter of the EIR has achieved the following:

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- He has managed to discount the aesthetic impact of 60 lights, including ten 60-foot stadium lights.
- He has concluded that all adverse impacts on wildlife are *de minimus*.
- He has completely ignored the mandate of the Golden Gate Park Master Plan and the San Francisco General Plan to maintain the sylvan and naturalistic qualities of the western end of Golden Gate Park.
- He has side-stepped the federal government policy to choose conservation over development, where the two conflict.
- He has dismissed the possibility of water contamination by both carcinogens and non-carcinogens.

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Truly, the DEIR may be viewed as a *tour de force* of calculated efforts to evade all environmental concerns.

To elaborate, with only a few of the possible examples.

## BIASED PHOTOS

One of the most laughable elements of the DEIR are the "before" and envisaged "after" photos. As another commentator, Greg Miller, has persuasively pointed out, each photo has been taken from a carefully chosen location that de-emphasizes the impact of the project. True, 60 -foot, 15,000 watt lights have a less-than-overwhelming impact when viewed, singly, from a distance of 1,500 feet, in bright sunlight. (Cf. Figures IV.B-5d and IV.B-8.) What, however, do they look like when viewed from 100 feet away with all 10 of them together in one shot? The only night-time photos are taken from Sutro Heights, over half a mile away. They most assuredly, do not illustrate the impact of the full blast of the 10 stadium lights at night.

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## WILDLIFE

Although the DEIR makes a token reference to the Pacific Flyway, it does not even attempt to analyze most of the effects of an additional 9 acres of lighted area, along the path of the Flyway. Yet, in **Impact BI-2**, the draft EIR comes to the conclusion that there will be less-than-significant impact in migratory wildlife corridors.

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This erroneous conclusion results from the drafter's decision to confine his analysis to the narrow issue of nighttime strikes. He concludes that because the stadium lights will be configured to avoid pinpoint lights, there will be little danger of night-time strikes. Note that even the literature cited only contends that there is a reduction of 40% in nighttime strikes, far from complete eradication of this terrible way of killing migratory birds. (Cf. text accompanying footnote 44 on page IV-F-28.)



In addition, this analysis fails to consider two important factors. There is no discussion of the effect of fog on dispersing and reflecting lights that are normally directed groundwards.

Secondly, and more importantly, there is no discussion of how the change in night-time landmarks may affect migratory flight patterns. Up until now, the entire width of Golden Gate Park has provided an oasis of darkness among the city lights. With the installation of the proposed project, smack in the middle of the dark area will be a series of bright lights covering nine acres up until 10:00 p.m. at night. And these lights are in the section of the park closes to the ocean. The smell and sound of the ocean will constitute another major landmark along the flight corridor of migrators. Yet, most birds prefer to fly over land. This change in night-time landmarks and configurations is likely to confuse many night-time migrators.

THE DEIR's discussion of the effects of night-time lighting on breeding birds is also obviously deficient, for two reasons. First, the DEIR contends that artificial lights might extend the foraging time of breeding and nesting birds. (Cf. page, IV.F-29, first ¶.)

This conclusion is simplistic in the extreme. Many bird species forage at twilight. While twilight falls in the surrounding areas, the proposed project will maintain daylight conditions over at least nine acres of fields. When the stadium lamps are turned off at 10:00 p.m., it will be night-time. There will be *no twilight* in the vicinity of the soccer fields. The result will be a substantial diminution in foraging habitat for twilight feeders.

One of the most specious conclusions that appear repeatedly through the draft EIR concerns the availability of other wildlife habitat in the park and throughout San Francisco. The DEIR's analysis runs as follows:

Birds that may be deterred from nesting near the Beach Chalet Athletic fields "have abundant habitat available to them elsewhere in Golden Gate Park, additional San Francisco parks and natural areas and the Presidio." (DEIR, page IV.F-29.)

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Yet this argument runs directly contrary to the provisions of California Fish and Game Code § 3503.5. That Code section recognizes that raptors, having lost much of their habitat to development, their populations are substantially more vulnerable to further loss of habitat. (See footnote 11, page IV-F of the DEIR.) Therefore, further loss of habitat is unjustifiable. In other words, there already inadequate extent of habitat available for raptors in San Francisco is, by statutory definition, **not adequate** to justify further loss of habitat, such as nine acres in the west of Golden Gate Park and the surrounding areas.

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Although the drafter of the EIR reports no nesting raptors in the western end of the Golden Gate Park, there was testimony on December 1st from a park volunteer, that there are now three pairs of nesting raptors in the western end of the park. That breeding pattern should not be discouraged, either by lights or increased noise from the proposed project.

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### CONTAMINANTS

One of the most specious and dangerous conclusion in the DEIR addresses the environmental impact of contaminants on natural water in the vicinity of the soccer fields. The DEIR claims that there will be no leaching of contaminants into the soil and the ground water below, nor any other contamination of water generated by the astro-turf.

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Yet, to arrive at this conclusion, the drafter simply ignores the storm conditions which result direct run-off into the ocean which occurs on average seven times per year. As the soccer fields lie less than 1,000 feet from the ocean, it is inevitable that contaminants from the astro-turf will reach the ocean and destroy aquatic life.

Furthermore, the DEIR fails to discuss *at all* the effect of crumbled turf mixing with surrounding soil and then leaching contaminants into the aquifer. The DEIR assumes that the proposed underlay material for the astro-turf will solve all leaching problems. Yet, he does not consider this problem.

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### GOVERNING POLICIES

The DEIR concludes that "the proposed project would not obviously or substantially conflict with any policies, not be inconsistent with the spirit and intention of, the *General Plan*." (DEIR, page III-4.)

Yet, barely three paragraphs of above this quoted statement, the EIR drafter notes that this same plan calls for "emphasizing the naturalistic landscape qualities existing in the western portion of the park." (Ibid.)

Surely, the virtual sports arena proposed, with 1,000 spectator seats, 60 lights and a sea of Astroturf, cannot be described as a "naturalistic landscape." How can the EIR drafter possibly have arrived at such a "no conflict" conclusion?

Yet, the drafter of the EIR contends further, in Impact BI-3, that potential conflicts with applicable local policies (page IV.F-33-34) are less than significant with the sole proviso that the trees to be cut down will be covered by an existing replacement program. Nowhere does the DEIR discuss the clear conflict with the Western Shoreline Area Plan (which has been adopted as part of the San Francisco General Plan), even though that plan calls for "emphasizing the naturalistic landscape qualities existing at the western portion of the park." (Page III-4 of DEIR.)

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For all these reasons (and many more), the DEIR is wholly inadequate and must be sent back to the drawing board. On the evidence of this first attempt by the Planning Department staff, it is highly questionable whether they are capable of producing an impartial and properly analyzed document on the Beach Chalet Athletic Fields Renovation project.

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I respectfully request that the honorable members of the Planning Commission disapprove of this DEIR and decline to certify it.

Sincerely yours,



Marilyn Kohn  
550 Battery Street  
San Francisco, California 94111

cc: California Department of Toxic Substances Control  
1001 "I" Street  
Sacramento, California 95814-2828

California Fish and Game Commission  
1416 Ninth Street, Suite 1320  
Sacramento, CA 95814



December 10, 2011

Environmental Review Officer  
Beach Chalet Fields Renovation  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
SF, CA 94103

My name is Ellen Koivisto. I am a public high school science (chemistry, physics, environmental science, and astronomy) teacher in San Francisco, and live on Great Highway, between Kirkham and Lawton. I worked for six years, between 1988 and 1994, at a small private school at the corner of 46<sup>th</sup> and Irving, and our school used the park in that area and the soccer fields on a weekly, sometimes daily, basis. I have lived in the immediate area since 1988, and use or go through this area of the park at least five days a week.

Due to the demands of my job, I have had little time to give the massive draft environmental impact report (DEIR) the amount of attention it requires. This is a 306-page document with numerous instances where conclusions are based on outside studies and sources. In order to analyze the conclusions drawn in the DEIR, these outside sources, their data, and their conclusions should be referenced and analyzed as well. This is close to impossible when one has 220 students to teach, finals to prepare and grade, and the end of the semester looming. As a result, I've only been able to do a cursory examination of the DEIR.

But what has become obvious in the little time I have had to devote to the document is that science and politics are often in conflict, the drafters of the DEIR had little time in which to study this massive project sufficiently, and that the sources referenced in the DEIR were picked with a particular goal in mind in many if not most instances. Often the science quoted is skimpy, dated, or misapplied, and some of the DEIR analyses are based on such extreme misrepresentations of questions raised in the scoping session so that the actual questions are not addressed at all. A number of conclusions have no supporting evidence whatsoever.

This letter, then, is a partial, very incomplete analysis of the DEIR based on my experiences of the neighborhood and park, my memories from and some video of the scoping session comments, how I discovered this project in the first place and the actions by the neighborhood necessary to ensure an EIR was even done, my decades teaching science (including six years where the park and beach were my laboratory), and my decades of analyzing and scoring student lab write-ups.

#### DEIR COVER PAGE

My understanding from the cover page letter is that comments should address the adequacy and accuracy of the DEIR. Comments, and responses to the comments, will be

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added to the Final EIR. There will be a chance to respond to or question the responses to DEIR concerns before the Final EIR is certified. Is that correct?

#### ACRONYMS, ABBREVIATIONS, AND GLOSSARY

There are items used in the DEIR missing from this section, such as Title 22, or Title 22 metals.

#### GLOSSARY OF TERMS

There are multiple terms missing from this section that are vital to the discussion at hand. For example, there are no definitions of “tree” or “shrub”, nor is there a definition of “recreation” given. Yet major parts of the DEIR and the project in general rely on definitions of these three things.

#### EXECUTIVE SUMMARY

The first place the lack of definitions becomes important is in the Executive Summary, where the number of “trees” and “shrubs” to be removed is first mentioned. The lack of definition for the DEIR is a problem. Lacking, as well, is a time line and location for the promised one-to-one replacement for trees/shrubs to be destroyed by the project.

The Project Alternatives seem limited in imagination and scope; why is there no alternative for good grass with adequate drainage and gopher barriers with no lights? That certainly was a suggested alternative at the scoping session. Yet it is not examined in the DEIR.

Why are the only potential areas of controversy and unresolved issues of the project the ignoring of the park master plan and the loss of the character of this historic resource? If increased safety is a goal of the project to be mentioned in the DEIR, why weren’t the comments and concerns about safety that were brought up in the scoping session addressed in the DEIR?

Looking at TABLE ES-1 Impact BI-2 and BI-3 again raises definition questions. If safety is a goal of the plan, what are the specific areas needing illumination, of what intensity (what does “no higher than necessary” mean?), what is “equivalent ecological value” (is it only similar species, or was that presented as an example of equivalent ecological value?), and how does the destruction of trees/shrubs effect the western wind break (a question brought up in the scoping session)? The protections for trees/shrubs that remain during the construction are listed, but no consideration is given to how the project itself will affect the remaining trees/shrubs in the long-term. Specifically, what affect will the increase in hours of light and difference in light wavelengths, the run-off from the fields, and the changes in the western windbreak have on the remaining trees/shrubs? This was also asked during the scoping session.

#### PROJECT DESCRIPTION

Since Golden Gate Park is an international treasure but a San Francisco resource, it

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would be useful to know for economic, safety, and environmental purposes the amount of league play already booked into the park fields by non-San Francisco groups. Living here, we often see soccer teams from out of the area, even teams from out of the country, playing on fields we can no longer access. This information, then, is important in how much consideration we should give to altering our park for these leagues. This issue is not addressed in the DEIR, but was brought up in many informational sessions with SFRP in advance of the DEIR.

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cont.

In Table II-1 it states that the fields are closed T-F until 3:30 p.m. These are daytime-use fields. Why are they closed then? They weren't before the fence went up. Is it so that no humans, except league players, can use them?

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At the end of the project description, in the paragraph beginning, "It is expected that staffing..." is another statement that I could find no evidence for in my cursory examination of the DEIR – that staffing would not increase and that 1/3 FTE would be sufficient to maintain the facility. While that may be true for synthetic turf in other parts of the city, it is unlikely to be true here. Issues of animal feces, sand-blasting, flooding, and wind all came up during the scoping session, but I cannot find where they are addressed in the DEIR. Even the South Sunset synthetic turf field is not a good indicator of the needs of a synthetic field at this significantly different elevation, in a real ecosystem, with different drainage issues, and very different wind issues.

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And while it is nice to see all the San Francisco agencies required to approve the project, I couldn't find any mention of approval needed from relevant state or federal authorities even though their interests in this project, given the possible impacts on endangered species on nearby federal land (the Snowy Plover at Ocean Beach, for example) and the impacts of crumb rubber and run-off migrating into the ocean, could be quite large. The need to check state and federal input in this plan was brought up at the scoping session.

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#### PLANS AND POLICIES

Pursuant to the issue of state and federal interest in this area is the section headed *Western Shoreline Area Plan*. Policy goals of reforestation and a naturalistic landscape are listed, as is improving the western end of the park for public recreation. At this point, a definition of recreation, and perhaps of public, would be very useful. The lighting and the synthetic turf covering, as well as the removal/destruction of numerous trees/shrubs, are in clear conflict with the need for naturalistic landscape and reforestation in this area.

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In the same way, under *Accountable Planning Initiative*, the Beach Chalet plan conflicts with the goal of protecting the neighborhood character of the area as testified to by numerous local residents and many meetings, and encourages the use of automobiles (the limited discussion of increased automotive numbers in IV.D of the DEIR will be discussed below).

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And while I could not afford to spend much time in this section of the DEIR, the idea (as stated in the Strategic Plan section) of synthetic turf replacing grass and dirt being somehow good for environmental sustainability, in addition to the lights and their

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concomitant CO2 output, was stunning. I had assumed, incorrectly I now see, that terms such as “environment” and “sustainable” would be well-defined in a draft environmental impact report. Since they are not, these words should also be defined in the glossary. It would be easier to have this discussion if the discussion is clearly defined and transparent.

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## AESTHETICS

In the initial description of the site as it is today, there are a few pieces of important information and some misstatements. The tree canopy (p. IV.B-1) is 30 to 40 feet in height; the light towers are slated for 60 feet in height, and will tower above the canopy. This is glossed over in this section of the DEIR, and in others. On the same page, the current visual character of the area is described as being “structured recreational facility within a larger context of naturalistic parkland”. Actually, it is visually a parkland area with a fenced off section of grassland unavailable for public use, frequented by birds, especially geese and ducks at certain times of the year, and gulls, ravens and raptors year-round. It looks, to someone who lives here and sees it all the time, neglected and forgotten, gradually going wild. This is consistent with local experience of the money and priority SFRP has given to this side of the city, with parks neglected, neighbors not informed or consulted before big changes are enacted, and gardeners fearing reprisals if they say anything about the situation or try to protect the parks.

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On p. 3 it states that the lit soccer fields will be minimally visible from Golden Gate Heights. A definition of Golden Gate Heights would have been useful here, or a map, but based on the views from friends’ houses in the area near Lincoln High School, since beach fires are visible from Golden Gate Heights stadium lighting will be even more so. This statement about Golden Gate Heights is an example of a statement made in the DEIR with no supporting evidence, seemingly used to avoid answering a question asked in the scoping session.

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It is unclear why views are from no more than 0.25 miles away when the area defined as being potentially impacted by the project was earlier defined as encompassing a much larger area. As I thought was made clear in the scoping session, these lights are visible at great distances (there was additional evidence presented about this in regards to the South Sunset fields’ lights at the comment session on 12/1/11) and the questions of how great a distance and how bright are important.

For the views of the projected site, the claim is made that the site is visually obstructed by trees on all sides. This may be true now (though it is not visually obstructed from large portions of the western trail), but people who live here and frequent the area have seen the great changes that occur to the views of these fields after storms. And, with the cutting of trees/shrubs anticipated by the project, many more of these obstructions will be removed. Since the project proponents have already identified the trees/shrubs that will need to be destroyed in order to put in the light towers and synthetic turf, why aren’t there pictures of the site with these trees/shrubs highlighted in the DEIR so that neighbors can also know which trees/shrubs are being discussed? Transparency leads to a better

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discussion of the issues by all concerned, as opposed to neighbors scrambling to try to get information in the dark. Additionally, since the light towers rise 20 to 30 feet above the obstructing vegetation, they will be visible no matter what. Aesthetically, during daytime, the towers would be ugly and damage the scenic view of the windmills and tree canopy with the western part of the city rising behind them

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cont.

For some reason, even though it was specifically requested in the scoping session, there are no projected views of the lights in the fog. Indeed, the definition of *Visual Sensitivity* given in footnote *a* of Table IV.B-1 lists many qualities to be used to determine light effects, but these are not quantitative properties as far as I can tell, and fog is not among them. How these qualities are combined to come up with a rating, based on what evidence, is missing. And nowhere in the definition is there a mention of the effects of weather on *Visual Sensitivity*.

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The report continues on p. 11 to state that the site is not visible from the south or southwest or the Ocean Beach public sidewalk. The lights, though, will be visible from all three of those areas. Golden Gate Heights is again ignored in the discussion.

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In the short discussion of Light and Glare on p. 12, the contention is made that the site is in between urban areas that already produce light. This is where the difference between aesthetic considerations and pollution is important. Light pollution is defined as “the alteration of natural light levels in the outdoor environment owing to artificial light sources”<sup>1</sup> or “the alteration of light levels in the outdoor environment (from those present naturally) due to man-made sources of light.”<sup>2</sup> The presence of some light pollution already does not negate the problems of adding on more light pollution. Just because air is smoggy doesn’t mean you can burn more petroleum with impunity. In fact, the presence of high air pollution triggers Spare the Air days, where it is illegal to set fires and people are encouraged to take transit. The presence of light pollution in the park, by analogy, should trigger the need to reduce light pollution in the park, not increase it. The *Evening Views* provided are very problematic for numerous reasons, and cast little to no light on the effect of the project as stated. They, instead, muddy the issue by providing views that have little connection to the realities of both the project and the area. Some of the problems with the views are enumerated below:

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1. The views provided are inadequate. Specifically the view from 48<sup>th</sup> and Lincoln is at street level, yet living areas in houses in the outer Sunset are on the second or third floors, and the apartments in that immediate area are four or five stories tall. The apartments across from Safeway are much taller. Even from a second-floor height, the 60’ light towers will be blindingly visible. Since Lincoln at 48th is not an area frequented by

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<sup>1</sup> Cinzano, Falchi, Elvidge, and Baugh. The artificial night sky brightness mapped from DMSP satellite Operational Linescan System measurements. *Monthly Notices of the Royal Astronomical Society* 318 (3): 641.

[http://www.lightpollution.it/cinzano/download/mnras\\_paper.pdf](http://www.lightpollution.it/cinzano/download/mnras_paper.pdf)

<sup>2</sup> Hollan. What is light pollution, and how to we quantify it? Darksky 2008 conference paper, Vienna. August 2008. [http://amper.ped.muni.cz/light/lp\\_what\\_is.pdf](http://amper.ped.muni.cz/light/lp_what_is.pdf).

pedestrians at night (either the wind or the fog prevents casual nighttime strolling), the main impact of the lights is on the residents. Yet this view, which purports that the lights will have minimal impact on the area, fails to show what the lights will look like from the heights the residents will be at when viewing them.

2. The view from 48<sup>th</sup> and Lincoln is disingenuous. Simple geometry shows that very little in the park will be visible above the tree line when the triangle formed by the viewer, the lighting towers at ground level, and the top of the lighting towers has such a steep angle for the hypotenuse. Farther back from the park, though, where the same angle of vision is much smaller, much more is visible. Specifically, standing at the intersection of Judah and La Playa looking north, not only would the light towers be visible, but the light would be impinging on all the streets in line with the fields for multiple blocks.

3. The views are all for twilight, but during twilight there is another light source (the setting sun and after glow on the horizon) competing with the artificial lights. The issue with these proposed stadium lights is not how that they will shed light during the day but how they will disrupt the night. The views fail to show how the lights will look during nighttime conditions, which is precisely when they will be most disruptive. This was brought up during the scoping session, but is sidestepped in the views provided in the DEIR.

4. There is no fog or even ocean haze in the air in any of the views, yet this area is foggy the majority of nights, as those of us who live here know. The Cliff House lights, for example, have a very different spread on the rare clear night than on a foggy night. Fog substantially changes light bounce and glare, but is addressed nowhere in the pictures and is mentioned only in one sentence that I could find in the DEIR. This was an area I specifically asked be considered in the scoping session as the effects of fog on light transmission are enormous and we get a lot of fog, yet it is ignored in the DEIR.

5. The only elevation view provided is from Sutro Heights, but Golden Gate Heights overlooks this entire area and all of its residents will have a clear, unobstructed view of these lights every night. Why is this not considered? It was brought up at the scoping session.

6. There is no view from the beach, yet the beach users (human and non) will be strongly affected by these lights. Why is this not addressed in the DEIR? It, too, was brought up at the scoping session as an important point that needed to be considered. The lights will be very visible from the beach, and will affect not only humans but animals in the GGNRA as well, and may be bright enough to affect aquatic life.

On p. 16, in fact, it is stated that because the calculated projections of light distribution and brightness matched the actual measurements for the same at South Sunset (though it does not state under what conditions) and Crocker Amazon, the assumption is that the same will be true for Golden Gate Park fields. With no consideration of fog, though, this assumption is faulty.

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On p. 19 it is stated that even though the project makes the athletic fields larger, the change would not be noticeable to most viewers. There is no supporting evidence, and the assertion runs contrary to logic. Many people travel through this area daily. Many use it and depend on it for needs other than soccer. These people will notice. Yet the DEIR assumes the only users of this area are soccer leagues. Why are the neighbors time and again left out of the picture for this area?

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On the same page, the comment is made that the view won't be changed by the removal/destruction of trees/shrubs. This is a very problematic statement as reducing the western wind break will substantially change the wind patterns from the ocean into the park, necessitating either more fencing between the park and the ocean (thus altering the view) or leading to likely damaging of the remaining trees/shrubs hence increased views of the synthetic fields. The statement, failing to take into consideration our often fierce local winds and two plus months per year of sandblasting, calls into grave doubt other DEIR statements made about the area.

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The photos and the PhotoShopped versions are interesting in what they don't show. For instance, I am sure the management of the Beach Chalet Restaurant would be much more interested in a night view, probably a night view from all directions, of the proposed project from their building. Will the stadium lighting flood out the restaurant views of the beach, for example, and eliminate the stars?

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The statements on p. 30 that the surrounding vegetation would entirely screen the project, and no field lighting would be noticeable from the surrounding neighborhoods depend on the pictures on p. 31 (Figure IV.B-9), which I have already demonstrated to be misrepresentations in several ways. There is no other evidence to support this statement.

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The one mention concerning fog comes in the Summary on p. 36. (2<sup>nd</sup> paragraph, end of the first sentence, in a parenthetical example, and the next sentence). The multiple concerns about light bounce, repeatedly brought up at the scoping session and well documented by many with long experience of SF weather (see the Sidewalk Astronomers, the Astronomical Society of the Pacific, and the physics dept at SFSU, for example), were entirely ignored in the statement:

However, even under conservative conditions, the spillover of the lighting would not be expected to travel so far as to adversely and substantially affect the closest neighborhoods, which are located approximately 800 feet from the project site. (p. IV.B-36)

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There is no evidence for this assertion at all in the DEIR. Similarly, there is no evidence supporting the conclusion that dusk conditions hold true for nighttime conditions. The only evidence given to support the claim that the light measurement will drop to zero at different distances above ground level (due to shielding and focusing) is a report prepared by a lighting manufacturing company; this statement is contradicted by the pictures of the project included in the DEIR and ignores the loss of trees/shrubs on light spread, as well



as entirely ignoring the impact of light bounce. It also implies that there is a biological effect from the lights since the only possible viewers at these heights above the stadium lights allowed in the DEIR are birds, aircraft, and spacecraft. This statement, faulty as it is, is misplaced in the DEIR in aesthetics when it rightly belongs in the section on biological impacts.

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Suddenly, also on p. 36, it seems that there are lights for this project that will remain on after 10 p.m.? This is new information. What is the "short period of time" these additional lights would be on? And why is the only impact being considered of the lighting on the human public view? Much is being ignored, especially the very real and large impact of stadium lighting on the nature of the western end of the park and the western side of the city, and the effects of light pollution on plants, animals, insects, and humans subject to it.

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### CULTURAL RESOURCES

I had little time to look at this section, but noticed a few things in the process:

1. It is not true that since the early 1960's the fields have been used almost exclusively for soccer and occasional special events. Until the field was fenced off in 1998 it was widely used by the people who live on the western part of the city. Schools used it, people had picnics there, people walked dogs and played Frisbee and bird-watched and wrestled and recreated. The fence took that away, and was put in without public notice that anyone in the neighborhood saw, much like what almost happened with this project. The fence was a theft of the commons. The areas around the fence are still used by visitors and neighbors for multiple purposes; eliminating these areas would be another theft of the commons.

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2. On p. IV.C-15 **Vegetation Features**, the trees/shrubs are defined as being "character-defining". This is nice, but it ignores the very real functions they serve of protecting the rest of the park from the wind off the ocean and holding the sand dunes in place. That is why frequent reforestation has to happen here; otherwise the park will revert to dunes. Ignoring this function of the vegetation ignores an important reality of the site.

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3. On p. 21, it is pointed out that federal guidelines call for "retention of historic vegetation and rejuvenating it, rather than replacement or destruction of the material." Rejuvenation of existing grass, even massive improvement of it, is possible and cheaper than synthetic turf. Why does this lose out to extended playing time then? What is the rubric for making this decision? What criteria are being used to analyze the data? It is very difficult to see how a fair, responsible, and safe decision can be made with so many pieces of information ignored or missing in the DEIR. Is this another instance of the project proponents withholding information from the neighbors?

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4. The issue of the tree/shrub destruction (p. 22) and the timing, location, and tree/shrub replacement types is mentioned extensively above.

5. The following, from p. 24, seems to contradict statements in other section of the DEIR:

The addition of ten new 60-foot-tall steel lamp poles would be a highly visible new addition to the landscape, not only during the day, but also at night in an area of the park which has been historically dark at night.

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#### TRANSPORTATION AND CIRCULATION

In the Transit section, p. 2, is another statement that shows little to no familiarity with the area in question. Here the DEIR says that there's plenty of MUNI capacity to the area, and bases this on capacity utilization numbers. This ignores the experiences of people who live in this area and use MUNI. The N-Judah, for instance, may be almost empty by the time it arrives at 43<sup>rd</sup> Ave, but it is packed from downtown to 19<sup>th</sup> Ave, and the frequency leaves much to be desired. People coming from the other side of the city, if they have a choice, will not take MUNI to this area as the rides are slow and long, and the trains and buses infrequent. And what percentage of field users come from SF? This information is vital in estimating increased car traffic for this project. If this project is not going to increase car traffic to the area due to MUNI ridership, a much more realistic view of the MUNI lines mentioned must be done. As it stands, the information on MUNI is both quantitative and useless, and the information on out-of-area SF park soccer field users absent.

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The parking usage survey is very incomplete. There are increasing numbers of special events that severely impact transit and parking in our area; there are multiple marathons, runs, bike tours, concerts, races, polo field tournaments, and cultural events that congest the area beyond capacity. Parking after dark in the area is almost non-existent (for expert opinion, consult the valet service working at Thanh Long's). The parking survey in the DEIR is inadequate for judging the effect of increased numbers of cars on the area.

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The assumption that the league players would all come by car raises the question of increased CO2 emissions generated by this project due to car travel alone (excluding the same question related to the synthetic field materials and construction). Isn't reducing global warming emissions a city goal, as stated earlier in the DEIR?

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In analyzing the traffic patterns, the DEIR failed to take into account a number of road anomalies that make certain intersections very dangerous and that confuse people not from the neighborhoods. For example, there are two places between Kirkham and Lincoln where roads (La Playa, Great Highway) blend together with no stop and blind angles in one direction. The N turnaround is confusing to most car traffic, and dangerous due to the combination of stops, tracks, double-parking, and pedestrians. The intersection at La Playa and Irving has no stop in one direction with cars whipping through at high speed around what is almost a blind corner. Crossing Lincoln anywhere in this area has become increasingly dangerous in recent years. Currently neighbors can clearly tell the difference between weekday traffic, when most of the cars are driven by locals, and weekend traffic, when most of the cars are driven by non-locals. The weekend traffic feels much more dangerous and much less predictable. And nowhere is there any mention of the situation when sections of streets or entire streets are closed for special

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events, such as the frequent closing down of the upper Great Highway for marathons or due to flooding or sand dune invasion. What effect will those events have on traffic in the area?

38  
cont.

## RECREATION

I had little time for this section as well, and many of the points relevant here have already been mentioned in other sections (aesthetics, for instance). But a few points did stand out.

1. The majority of the public space and recreational resources affected by the proposed project are SFRP-managed only when considering ground. The affects of the light extend well beyond the park into GGNRA space and the ocean, and the affects of light, possible increased wind, transportation of tire crumbs, and traffic impacts will also affect the surrounding neighborhoods.

39

2. The 8-foot-tall chain link fence currently around the fields was added without neighborhood notification, and was a de-facto seizure of public lands for private use. The current project has attempted to proceed in the same way. Dog walkers, who daily circle the fields with their pets, saw no notices about the proposed synthetic fields and light towers when the soccer clubs were apparently meeting with manufacturers of synthetic turf under the auspices of City Fields and the SFRP. No one in the neighborhood saw any notices, and the neighbors only found out about the proposed project when a local member of a soccer league told us. This initial utter lack of transparency or concern for the setting of the proposed project makes clarity and transparency in the DEIR vital.

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3. Why are the fields not open on weekdays until 3:30 p.m.? Why are they closed 3-4 months out of the year? If grass fields are properly planted and managed, they don't need to be out of use this much, according to multiple natural turf sources nationally and internationally.

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4. Fields out of use for neighborhood humans are not out of use for neighboring animals. Unlike the prior areas that have been stripped and laid with synthetic turf, this area of Golden Gate park is an ecosystem. Ignoring the consequences to the animals who live in and use this area doesn't make such consequences nonexistent.

42

5. The information on the Murphy Windmill (p. 3) needs to be updated.

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6. On p. 4, a single sentence is used to cover "passive outdoor activities, such as nature watching" which is "popular in this portion of the park." The list of resources above this sentence is specific about particular sites and their locations relative to the proposed project; the same should be attempted for the areas for nature watching. Specifically, where does this happen in relation to and at what distance from the site?

44

Under the Regulatory Framework section, it is stated that this area is attendant on and adjacent to the California Coastal Commission's Local Coastal Zone. Crumb rubber

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migration to the beach and ocean, and light pollution from the stadium lights will severely affect the dune ecosystem, which is just across the street from the proposed project. The natural character of the beach will be degraded, and improving and stabilizing the dunes will be impacted by any losses in the western windbreak. Elimination of sewer treatment facilities is contradicted by the referred to proposal to put a water treatment facility into this area, tree/shrub destruction runs counter to reforestation, reducing the amount of foliage will not ensure “vigorous forest tree growth” nor “maintain high visual quality”, and synthetic fields with stadium lighting will not “emphasize the naturalistic landscape qualities existing at the western portion of the park.”

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cont.

The Golden Gate Park Master Plan states that some of the problems with the fields are drainage and lack of regular maintenance (p. E-10), yet none of the options in the DEIR involve fixing of the grass fields with no stadium lighting.

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The Master Plan objectives listed on p.11 fail to include non-team recreation. While these areas have been used for team recreation since the 50's they have also been used for non-team recreation and by wildlife. Much of this area was taken away from public use without public input or comment by the erection of the chain-link fence, but it is still a public area and as much as possible still used for multiple purposes. Leaving the non-team uses out of the analysis skews the picture of the affects of this proposed project.

48

Under Policy E, point 4, it needs to be added that the water from the synthetic turf is 100% fatal to aquatic organisms as testified to by Adina Paytan at City Hall on 12/1/11.

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Objective III, Policy M seems to have been skipped in the traffic analysis done in the prior section of the DEIR, and needs to be addressed.

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And the Impact Analysis should be reconsidered in light of these and other comments. Increased cars, decreased parking, increased exhaust, and increased CO2 emissions are significant impacts. And nothing in the lighting information in this section discusses the very negative impacts of five additional hours of light pollution to what is now a dark ecosystem.

51

52

## BIOLOGICAL RESOURCES

Besides the numerous omissions detailed above (definitions, for example, of “tree”, “shrub”, and “environment”), other omissions specific to this section of the DEIR are troubling. On p. 4, the current ecosystem of this site is dismissed as irrigated turf and non-native forest, ignoring its use by various migratory communities and local non-native species. The section on tree resources ignores the wind-break and dune stopping functions of the trees planted, and includes a six inch diameter definition that does not say whether that six inches is in trunk or foliage.

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The wildlife surveys are totally inadequate, apparently composed of one visit in February and another in May. There are no consultations with experts possessing decades of

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experience in the wildlife populations of this area, experts such as local amateur enthusiasts to the Audubon Society to the California Academy of Sciences. There is no mention of prior storms that may have knocked down old nests, though a point is made about finding no old nests, and no mention is made of the sighting methodology used, the number of spotters looking, their credentials and expertise, daylight conditions, hours spent, weather conditions on the days of the observations, possible coyote sightings (coyotes in the area drive most of the birds away temporarily), or any of the myriad issues relevant to evaluating the worth of the collected data. This area is full of raptors, for instance, and is part of their migratory corridor across the Golden Gate. Given the everyday presence of birds in this area as observed by local residents, the data collected in these two visits for the DEIR is inadequate.

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cont.

Noteworthy, also, is a brief comment on p. 5 stating that the trees/shrubs largely attenuate the noise from the nearby roads. This observation calls into question statements made elsewhere about the effects of increased noise at the site both on local wildlife and, after the trees/shrubs are cut down, on the neighbors.

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This is why it is difficult to see how a determination of susceptibility could be made based on two visits with questionable data collection, as listed on p.7 *Species Assessed in Detail #1*. The same difficulty occurs with point #3 on the same page: the habitat is determined to be present within the project area or vicinity with no definition of “vicinity” given and determined by whom and when? This point seems to indicate that these observers who came twice had to have seen species in habitat and recognized the habitat as such in order for the determination to matter, and that longitudinal observations with vastly larger data sets cannot be used in this determination. Is that accurate? If so, why?

Problems occur in this context again on p.8 where in two visits the observers saw no bank swallows within 200 meters of the site. The dates of the visits and the time of day of the visits could have skewed the observations. Certainly the apartment windows across from Safeway and the cliffs right behind the bus terminal to the north could provide appropriate habitat and are within 200 meters of the proposed project. Was anyone who bird watches in these areas consulted?

57

In fact, it is not clear to me how the special-status animals to be looked for were selected. I have seen pelicans on these fields before, and the Western snowy plover is at Ocean Beach, easily within the 200-meter distance indicated. I am unclear, in Table IV.F-2, what “moderate potential” means in regards to the hawks. Hawks are in these trees and feed in and around these fields. People observe this all the time, and I’m sure there’s video of hawks making kills in this area on YouTube if you look for them. Based on neighborhood observations, conducted informally over many days, months, and years, these birds use the trees and feed in the fields. Changing grass to plastic with crumb rubber would seem to be more than a moderate disruption for the 52 bird species sited on p. 18 that have been observed in this area.



On p. 22 in the discussion of significance criteria, it seems clear that the proposed project would interfere substantially with fish, birds, insects, and other wildlife species using the area for migration, as well as with natives. Testimony as to the effect the lights would have on fish and birds was presented at the 12/1/11 meeting, and the effects of light pollution, noise, synthetic turf, and increased car traffic on coyotes, skunks, raccoons, opossum, and foxes (all resident in this area) are easily found in the literature. The conclusion of a less than significant impact with mitigation, then, seems unsupported. The recommended mitigation for nesting is inadequate, and the elimination of a major hunting ground an enormous problem that is not addressed at all. The lighting issue is inadequately addressed, light bounce is ignored, and the effect of nighttime lighting on migratory corridors and animal health is downplayed contrary to the evidence in the scientific literature on this subject. The noise issue is given up on entirely with the statement on p. 16 that noise will increase and it might have significant impacts. There is no mention of insects.

The issue of bird migration and nighttime lighting is given a curious spin on p. 26. Migratory birds fly low over this area, as daily observations show, and given the amount of fog in the area, all the numbers provided in the migration elevations are too high and therefore incorrect. Thus the lights will affect migrations. As stated on p. 27, "The tendency of birds to move toward lights at night when migrating, and their reluctance to leave the sphere of light influence for hours or days once encountered, has been well documented." Eliminating stopover habitat, like the fields, is a severe problem. This space and the Polo Fields are commonly used as resting sites for big birds on long flights (again, based on years of observations of these sites). The soccer fields are located within an Urban Bird Refuge; carpeting over the natural turf and lighting up the night will destroy this area as an Urban Bird Refuge, but this aspect of the project is not addressed in the DEIR. The statement on p. 29 that "the breeding bird population in the immediate area...is apparently quite small" seems to be based on conjecture in place of substantial observational data.

Fog eliminates any possible point-source nature of the stadium lights, increasing the possibility of birds being trapped by the light and circling until exhausted or dead, as detailed on p. 28. I'm not sure why migratory corridors in the vicinity of the site are considered to be unknown; what information sources were consulted for migratory information in this area? But the effect on bird populations is clearly considered to be a major problem, as detailed by the DEIR. Then the DEIR goes on to assume that all birds in the area are either migratory and/or flying above the 60 foot lighting tower height; this is contrary to daily observations of the area and to the statements immediately preceding it. The claim that the stadium lighting would not stand out from the neighborhood is unsupported (and dealt with in more detail in the aesthetics part of this response). Generally, the conclusions of the analysis of the effect of lights on birds at this site seems to be based on little direct observational information of the area and contradicted by neighborhood experiences and some statements within the DEIR itself.

Nighttime lighting disrupts not only bird behaviors but mammals' and insects' as well, and has health consequences (the Wikipedia article on light pollution contains excellent

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references on this topic). Stadium light pollution in this very dark area, especially in conjunction with the synthetic turf and increased noise, can be considered akin to creating an aquatic dead zone in a once fertile marine environment. The elimination of this specific area as a potential habitat for wildlife cannot offset by the existence of other green spaces elsewhere in the park; subtraction of resources is subtraction. There is no evidence presented as to the impacts of other synthetic turf projects on wildlife because no EIRs were done on the other projects. The Dooling and Popper study cited on p. 30 doesn't list the species that apparently prefer traffic noises, and the statement that birds have less sensitive hearing is no longer considered true, especially after recent studies done on the speed of bird song production and pitch ranges.

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cont.

San Francisco is a city full of microclimates and related microhabitats. The soccer fields and surrounding paths and trees/shrubs are an existing microhabitat, different from park land in any direction around it, frequented by specific animal inhabitants, yet little of the research presented deals specifically with the realities of this site. For example, the study on noise pollution was done by the Albany Unified School District for the Albany High School field, a vastly different environment in every way. The statement, on p. 31, that "the highest levels of noise and activity at the fields already occur during the avian breeding season" is presented without any proof at all.

59

In the tree/shrub discussion, the "shrubs" are described as being "rangy and unattractive, with unbalanced and asymmetrical form." These are qualities considered attractive in Japanese gardens (see the Japanese Tea Garden for examples), and these "shrubs" are often used by locals for recreational sitting and low climbing due to their ranginess. Dead trees, mentioned on p. 33, are not devoid of ecological value; dead trees are highly valuable in living ecosystems, as stated in basic high school biology textbooks. Again, the replacement of removed trees (but not shrubs) is mentioned, but no location is given for the possible replacements, yet the ecological value of a tree (or shrub) includes its location. In discussing the construction process and the likelihood of damage to remaining tree roots and crowns, the point is made that there are no SFRP policies or ordinances related to construction within a tree's dripline. No policy does not equal no damage, just as no law or legislation existing to define a situation does not equal the reality of a situation. Therefore, saying that potential tree damage would be less than significant is disingenuous and not a reflection of reality so much as a reflection of a lack of policy.

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In the Cumulative Impacts section, it becomes clear that the many stated small impacts are added together in such a way that they are not considered cumulative at all; this is contrary to the reality of ecosystem degradation where small impacts add up or multiply. While federal, state, and local regulations are mentioned on p. 34, many that were brought up in the scoping session were not adequately considered in the evaluation of the impacts. For example, the effects of the lights on fish in the ocean just across the street were not considered. While the trees/shrubs were apparently scanned for nests, nothing is said in the report about "potential foraging opportunities, cover, and roosting", though these are mentioned on p. 35. There is nothing in the report about contamination of food, reduction of food sources, reduction of water sources, or contamination of water for the

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bird population. In fact, the paragraph beginning “Past projects” on p. 35 seems to be saying that because this area is not original habitat, that it is OK to destroy this new habitat and severely impact the animals who live here.

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cont.

The proposed project is consistently referred to on the last page of this section as being small given the area, and being a drop in the bucket compared to other projects planned for the park (such as the waste water treatment plant). This is faulty logic. Any destruction of habitat is big when there is so little natural habitat left and animals corridors are few and far between. The park provides one of the only refuges and extant large animal corridors in the area. I’m unclear as to why the DEIR on the Beach Chalet fields then veers into examining the site proposed for the wastewater treatment plant, but even this description is inaccurate and slightly deceptive. Foraging happens in many habitats, not only in grassland, and there is more in that area (piles of composting vegetative matter, heaps of soil, huge fungus patches) than listed. Landscaping, as a proposed part of the project, does not replace habitat; destroying habitat to create landscaping is biologically wasteful and creates resource poor areas where rich ecosystems once existed. The claim that the grassland habitat loss equals 0.03 % is unsupported by any math I could find in the document.

62

#### HYDROLOGY AND WATER QUALITY

I had no time to go through this section before the deadline for comments. I will, however, go through it in detail as it encompasses many of my major concerns about this project.

#### HAZARDS AND HAZARDOUS MATERIALS AND AIR QUALITY

I could find nothing in regards to the migration of hazardous materials due to wind and water, yet I know from a study I did of the South Sunset Playground that crumb rubber migrates and gets into storm drains. Photographic evidence was presented at the 12/1/11 hearing as to crumb rubber migration at Crocker Amazon. And the soccer league community has frequently mentioned the tracking and migration of crumb rubber into their cars and homes. This site is windy and prone to flooding; crumb rubber here will migrate into the rest of the park, onto the beach, and into the ocean, yet this is not addressed. This issue was brought up in the scoping session.

63

Why is crumb rubber misidentified as styrene butadiene rubber? Since crumb rubber is made from ground up used tires, it is not pure styrene butadiene rubber. Tires pick up oil from the roads, and lead from older tires that ran during the era of leaded gas, just to being with. Some of the heavy metals associated with used tires are not considered in the DEIR at all. Copper comes from brake pads and is a major source of water pollution during storm run-off. Those copper fragments on the roads get ground into tires during regular wear, and will end up in crumb rubber. Yet it is not considered.

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Repeatedly the comment is made that specific requirements for content, testing, and recyclability will be made of synthetic turf manufacturers. There are numerous fields

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already in SF with synthetic turf. How many of the manufacturers of the synthetic materials for these fields meet which of these requirements? Where are the details on these specific requirements? What is the track record for the success of these specific requirements?

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cont.

What is the source of the sand for the 30% of the infill that is sand? What is the source of the tile or aggregate rock base?

How can the manufacturer ensure lower amounts of various metals unless they know the exact sources and histories of all the tires used? Carbon black, by the way, is added to polypropylene to reduce UV degradation in sunlight usages. The discussion of the manufacturing process on p. 2 lists much of what is supposedly taken out, but little of what is added. And while there is the assertion that the crumb rubber “should” have lower levels of iron, manganese, and chromium relative to earlier products, there is no proof of this, and no numbers given. Nor, in the same paragraph, is there any discussion of the health effects and biological dangers presented by nanoparticles beyond those due to inhalation (such as migration into cells and the brain, cytotoxicity, testicular cancer risks, and more).

66

The European Union uses the hazard-based, precautionary approach. The United States uses the public as guinea pigs approach. Why, though, is SFRP willing to treat children and neighbors of these synthetic turf fields as guinea pigs? The testing data given is very limited in scope and estimated exposures, does not look at cumulative chemical exposures (even though this field was revolutionized by work done by a scientist at UCB), and divides risk into binary concerns: noncarcinogenic and carcinogenic. However, during the scoping session, concerns were raised about the chemicals involved that went beyond cancer-causing abilities. What about mutagenic chemicals, endocrine disruptors, developmental and reproductive toxins, allergens, immunotoxicity, neurotoxicity, organ system toxicity, and bioaccumulation? Because these are not considered, though many of them are relevant for many of the chemicals and metals to be found in crumb rubber, the hazard quotient will produce faulty quantified information; it will give a number that will have little to no meaning in the real world. The further assumption that mixed “noncancer effects” are additive is unsupported and will lead to more numbers with little basis.

67

On p. 3, the USEPA is referenced in the first paragraph, yet the footnote cites the CAEPA. These organizations are not the same. The second paragraph assures us that conservative estimates of exposure are used, and the assumptions re. noncancer risk are conservative, but additive calculations are not conservative, nor do they reflect modern toxicology research. The last paragraph in the Health risk Evaluation section says that because the synthetic turf will be outside, the wind will “easily disperse particulate matter”, reducing player exposures to nanoparticles. What is not addressed is that the wind blows in specific patterns in this area, so that these nanoparticles will be blown in specific locations and dumped there over and over, accumulating. This means that neighbors downwind of the fields, and animals living downwind, will be getting daily exposures to these nanoparticles for as long as they live there. This is not considered (as,

indeed, the microclimate of the area, and many of the effects of this project on neighbors, and local animals).

↑ 67  
cont.

Under the 2007 Integrated Waste Management Board Study, a 4-year old study looking at playground and track surfaces is cited. These surfaces are not the same as crumb rubber and do not pose similar risks. The last paragraph of this section provides no fire data specific to synthetic turf, though this was requested at the scoping session. Yet data on the frequency of such fires and the effects is not difficult to find:

1. From Wikipedia article on the Civil War (Oregon football rivalry)

**2010:** After a 37–20 victory which sent the Ducks to the BCS championship, a group of Duck fans lit on fire a T-shirt saying "I hate your Ducks" over the Beavers logo on the field. The resulting fire caused significant damage to the artificial turf. Police used a photo of the incident from the *Portland Tribune* to arrest a University of Oregon student and charge him with riot and several misdemeanors.[9]

The original article is here:

<http://special.registerguard.com/csp/cms/sites/web/updates/25643028-46/burning-shirt-police-britton-riot.csp>

2. From Wikipedia article on the Pingle School: The 2005 Pingle School fire

On 2 December 2005, the Pingle School sixth form building caught fire as a result of a 'break time prank gone wrong'. [2] This resulted in the near total destruction of the sixth form building. The fire was started within school hours and required the evacuation of the entire school population. Three 15 year old boys were arrested in connection with the fire out of which one was charged with arson and sentenced to 18 months detention. [2] Since the sixth-form centre was destroyed in the fire, temporary accommodation for lessons saw the use of portable classrooms, provided by Portakabin Ltd from their centre in Derby. The new sixth-form area was officially opened in December 2007, being in full use from February 2008. There were two other major fires at Pingle School prior to this. [http://en.wikipedia.org/wiki/The\\_Pingle\\_School#The\\_2005\\_Pingle\\_School\\_fire](http://en.wikipedia.org/wiki/The_Pingle_School#The_2005_Pingle_School_fire)

68

3. from CBS Chicago 8/31/2011

Vandals Set Fire To Artificial Turf At North Central College

**NAPERVILLE, Ill. (CBS)** – Authorities in west suburban Naperville were offering a reward of up to \$1,000 for information about who set fire to the artificial turf at North Central College's football field last weekend.

Around 11 p.m. Saturday, someone started a fire in the end zone of the North Central football stadium, burning the letters "C" and "L" in the word "CARDINALS," causing \$10,000 worth of damage, police said.

4. On YouTube there's the Westfields Sports Synthetic Grass Fire #1

At: <http://www.youtube.com/watch?v=1cGj0VoaLI>

5. There's a report issued on the flammability of artificial turf from the ISSS meeting in Vienna in 2004 available at [http://www.iss-sportsurfacescience.org/downloads/documents/AIKVABHOK5\\_Fire\\_Muller\\_0105.pdf](http://www.iss-sportsurfacescience.org/downloads/documents/AIKVABHOK5_Fire_Muller_0105.pdf)

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that is very informative with good science, though still with a limited scope (due to the wide array of materials and formulations of synthetic turf).

6. An article with video on an artificial turf factory in Italy burning in March of this year is at <http://firegeezzer.com/2011/03/27/artificial-turf-factory-burns-in-italy/>

7. A web page devoted to synthetic turf fires and vandalism lists 42 cases and their costs at <http://www.synturf.org/vandalism.html> with the most recent case listed for September 2011.

8. An article in the Frederick News Post for August 2009 about the arrest of three students who set fire to a middle school synthetic turf field at <http://www.fredericknewspost.com/sections/news/display.htm?storyid=93522> included a picture of the damage and a damage estimate from the company that installed the synthetic turf of around \$20,000.



9. West Ottawa Soccer Club fire destroyed one of their artificial turf fields recently.

10. Here is video of a playground fire in Rutherford, New Jersey at the Lincoln School <http://www.youtube.com/watch?feature=endscreen&NR=1&v=LBdiHpKtP1I>. Please note the color of the smoke.

In general, the section of the DEIR relies heavily on manufacturer supplied or company sponsored studies. These are not the same as peer-reviewed science and should not be given the same weight. Yet these company sponsored studies dominate the literature studied as cited in the DEIR. Even a company provided MSDS for crumb rubber cites more concerns with this material than most of the works referenced in the DEIR (see entech's crumb rubber MSDS for example at <http://edge.rit.edu/content/P11413/public/Crumb%20Rubber%20MSDS>). Many of the site-specific studies referenced do not match our local climate or conditions, or make assumptions that do not match possible uses (for instance a one-time ingestion of 10 grams of tire shreds by a child doesn't fit the habits of small children who often put things in their mouths over long periods of time).

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cont.

69



Glue and binding materials are mentioned for the first time on p. 9 but no mention of the chemicals they are composed of is listed anywhere I could find. Adhesives and binders are notorious VOC releasers, and many leech chemicals into contacting solvents (such as water). What are these materials composed of?

70

What are the guarantees of recycling of the 400 tons of debris estimated to be produced by this synthetic turf project after 8-12 years of use? What penalties are there for non-compliance? How does the production of 400 tons of debris after 8-12 years of use square with the environmental concerns of the city as stated in numerous regulations cited in other parts of the DEIR? What is the CO2 result of all this manufacturing, ripping out, putting in, caring for, ripping out again, and disposing of the synthetic fields?

71

72

How many of the recommendation of the Task Force, listed on p. 9-10 been accomplished? How, for instance, do they ensure that no synthetic turf is purchased that contains lead?

How was exposure of human and animal neighbors to the chemicals where risk evaluations were done studied? After all, the players will get a maximum exposure of 3 hours a day, 4 days a week, 8 months a year while downwind neighbors will get 12 or more hours a day exposure, 365 days per year.

No matter how the studies chop up the data, zinc qualifies as above the total threshold limit, but is excluded from the final summary of the data on the synthetic fields. Why? On p. 16, a test is determined to be more aggressive at dissolving constituents from a material than water because the solution was acidic. But water is acidic due to acidic compounds dissolving into clouds and CO2 solubility in general.

For the End-of-Life Recycling Plans I see no estimate of the amount of infill lost per ten years of the "life" of a field. This material will not be recycled. How much will it be and where will it go? This question was asked in the scoping session but is not addressed in the DEIR.

73

On p. 18 a wipe test is done but the conclusions are questionable. If one wipe produces 4.0 micrograms, then sticky hands doing four wipes and licking the hands clean can ingest 15 micrograms in a day. Another study on p. 19 assumed a standardization of synthetic turf that is unsupported in any of the literature I've seen. Another study that analyzed infill samples found cobalt and zinc in hazardous amounts. Yet another wipe sample report said it adjusted for the amount of lead, but didn't show how this was done.

The idea that there is no correlation between field temperature and VOCs as cited on p. 28 is highly unlikely given how chemicals behave. If this statement is to be accepted, it needs more support. What other studies back this assertion? What proof is there of the synthetic turf life-span in the similar climate conditions? What evidence is there that exceeding by 10 times the STLC is a good measure for soluble analysis of metals? Why were only metals studied in regards to hazardous waste classification? Why has the SFRP yet to implement the synthetic turf standards? Has there been no turf replacement



at all up to this point? Generally, the section on Hazards seemed slapdash and often tangential to the point.

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cont.

#### ALTERNATIVES

Why is replaced, graded, and gopher-proofed grass with new bathrooms, fixed paths, ADA parking spaces, and no lights not an alternative?

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74

I look forward to the addressing of these concerns and answers to these questions.

Thank you,  
Ellen Koivisto

**From:** Thomas Kuhn [<mailto:tom@tomkuhn.com>]  
**Sent:** Sunday, December 11, 2011 9:52 AM  
**To:** [bill.wycko@sfgov.org](mailto:bill.wycko@sfgov.org)  
**Subject:** Comment on DEIR for Beach Chalet Athletic Fields

Mr. Bill Wycko  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission St. Room 400  
San Francisco, CA 94103

Re: CULTURAL AND AESTHETIC RESOURCES  
Public Comment on the Draft Environmental Impact Report  
Beach Chalet Athletic Fields Renovation  
Planning Department Case No. 2010.0016E  
State Clearinghouse No. 2011044005

Dear Mr. Wycko,

I am writing to you to out of concern that the DEIR of the proposed Beach Chalet Athletic Fields does not tell the whole story on how the esthetics and overall feeling on the western edge of the Park will be effected.

The Draft EIR refers to Beach Chalet Athletic Fields as now comprising a mere 0.7% of the 137 contributing resources of the Golden Gate National Historic District; and that their absence will not significantly impact the GGNHD. This statistic is misleading as it does give sufficient weight to this important portion of the park and the historic and aesthetic intent of its pastoral and natural design.

01

The 60 foot lighting towers, while acknowledged as being bright are considered not aesthetically significant , because of their relatively small percentage of the greater visual field. That depends on where you are standing. I happen to live across from Sutro Heights Park., and even from there, the present view would be degraded.

02

Therefore, I am respectfully requesting that you make corrections to the DEIR that reflect more accurately the significant changes to the aesthetic and historic character of the Park. Thank you for your careful attention to this important matter.

Sincerely Yours,  
Tom Kuhn

Tom Kuhn DDS  
2383 California St  
San Francisco CA 94115

O: 415/921-2448  
H: 415/751-6925  
C: 415/205-2477





Linda Avery/CTYPLN/SFGOV

11/21/2011 07:20 PM

To

cc Don Lewis/CTYPLN/SFGOV@SFGOV, Sarah B  
Jones/CTYPLN/SFGOV@SFGOV, Bill  
Wycko/CTYPLN/SFGOV@SFGOV, Patricia

bcc

Subject Fw: BEACH CHALET DEIR - Request for extension of review  
period

*Linda D. Avery-Herbert*

Director of Commission Affairs  
SAN FRANCISCO PLANNING COMMISSION &  
SAN FRANCISCO HISTORIC PRESERVATION COMMISSION  
1650 MISSION STREET – SUITE 400  
SAN FRANCISCO, CA 94103-2414  
TEL: 415.558.6407 – FAX: 415.558.6409  
WEBSITE: [www.sfgov.org/planning](http://www.sfgov.org/planning)

----- Forwarded by Linda Avery/CTYPLN/SFGOV on 11/21/2011 07:20 PM -----



Thomas Kuhn  
<tom@tomkuhn.com>

11/21/2011 06:50 PM

To c\_olague@yahoo.com

cc Linda.avery@sfgov.org

Subject BEACH CHALET DEIR - Request for extension of review  
period

To Christine Olague, President Planning Commision

Beach Chalet Athletic Fields DRAFT EIR

Planning Department Case No. 2010.0016E

State Clearinghouse No, 2011022005

Dear President Olague,

This letter is to request that the Commission grant a 90 day extension of time for public comment on the DEIR Beach Chalet Athletic Fields.

Due to the extensive, complex and technical nature of the DEIR, and the need to understand its relationship to other potential Golden Gate Park projects, and with the holiday period upon us, the December 12<sup>th</sup> comment period does not provide enough time for far review.

Please consider an extension of time for this very important DEIR to be properly reviewed and commented upon.

01

Thank You for your assistance on this matter,

Thomas Kuhn DDS

**Tom Kuhn**

Friends of Sutro Heights Park/ Coalition to Save Ocean Beach

546 48th Avenue

San Francisco CA 94121

415/751-6925

**From:** Rakesh <mntwood@gmail.com>  
**To:** bill.wycko@sfgov.org, don.lewis@sfgov.org  
**cc:** sfoceanedge@earthlink.net

---

**Date:** Sunday, December 11, 2011 11:25AM  
**Subject:** Comments DEIR Beach chalet athletic fields

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Rakesh Kukatla  
1319 46th Ave, 201  
San Francisco, CA 94122

December 11, 2011

Mr. Bill Wycko  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission St. Room 400  
San Francisco, CA 94103

**Subject:** BEACH CHALET ATHLETIC FIELDS RENOVATION  
Draft Environmental Impact Report  
Planning Department Case No. 2010.0016E  
State Clearinghouse No. 2011022005

Dear Mr. Wycko:

I am writing to inform you of my opposition to the proposed renovation of the Beach Chalet Athletic Fields with artificial surface and artificial lighting. I am in favor of an alternative that would put artificial surface playing fields on top of building roofs and parking garage roofs. This alternative would renovate the Beach Chalet fields with natural grass (without artificial lighting) and renovate the building roofs and parking garages roofs with artificial surface and artificial lighting, thus providing more hours of play for youth soccer. I respectfully request that the Planning Department focus on this latter alternative and preserve Golden Gate Park's parkland.

I find the Draft Environmental Impact Report to be deeply flawed. I am in agreement with the DEIR finding that the proposed project will have a material adverse impact on many character defining features of the Beach Chalet Athletic Fields. I request that the following areas be explored further:

1) The grassy field along with the trees and shrubs is a living ecosystem that provides aesthetic (natural features and natural beauty of grass and trees) and



health benefits (feeling of touching grass and tree barks as opposed to touching plastic and concrete). Please show how the aesthetic and health benefits will be mitigated.

02  
cont.

2) At present this is a low traffic area, please explain how this additional traffic along with traffic to the renovated windmill and the ongoing events at the beach affect the traffic patterns and load.

03

3) Why are trees that are as tall as a three storey building called shrubs.

04

I am a frequent user of the park (average of 5 days a week). I enjoy the grassy meadow and natural features of the athletic fields along with the existing shrubs and trees. I want to preserve and renovate these natural features for my kids and future generations.

I would also like to receive a printed copy of the Comments and Responses and the Final EIR by mail.

Please let me know that you have received this letter.

Sincerely,

Rakesh Kukatla.

December 12, 2011

Environmental Review Officer  
Beach Chalet Fields "Renovation"  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94104

Re: Comments on the dEIR for the Beach Chalet Fields "Renovation"

Dear Sirs/Madams:

Thank you for this opportunity to comment on the draft Environmental Impact Report on the soccer fields out by the Beach Chalet.

1. This project is no "*renovation*" at all. Rather this project is a completely new direction and thus a new project for the soccer fields. The project describes a change in function from a play field with a rural, pastoral setting into a highly technical sports arena and should be explained as such in full. The title of the dEIR should be ***Beach Chalet Sports Arena***. A second comment in this regard is that the photo on the cover of the dEIR is completely deceptive and not conducive to trust in the public CEQA process as performed by the Planning Department of San Francisco. This photo *must* be changed to illustrate the fields as they will be used and lit by the proposed lights since these are the most significant changes proposed for the fields.

01

02

2. The dEIR compares the project and the proposed alternatives relative to the various considerations that make up an environmental impact, i.e., Land Use and Land Use Planning, Aesthetics, Cultural and Paleontological Resources, Wind and Shadow, Recreation, Biological Resources, Hydrology and Water Quality, Hazards and Hazardous Materials, Agriculture and Forest Resources, and Air Quality. This list in the dEIR does not grade or weight the considerations; it merely views them as though they were all equal.

03

The legislative intent of the California Environmental Quality Act does not view these considerations as equal. The preservation and enhancement of the environment are more important than these other issues. This fact was made clear by the creation of the second, "further" explanation of what is meant by environmental protection, found in Section 21001. And, by the way, recreation is not mentioned within CEQA legislative intent at all.

This dEIR should evaluate the environmental impacts in the context of the intent of the CEQA legislation and not treat impact considerations as equals.

3. This dEIR should define what is meant by “environment”. It appears that this EIR defines “environment” to mean play opportunities for youth at the expense of the enjoyment by these same youth and future youth of Golden Gate Park as resource with a naturalistic setting. Might it be that this dEIR has misconstrued the words “healthful and pleasing to the senses and intellect of man” and ignored the preservation of “a high-quality environment”? [See below, Section 21000 (b).]

04

4. This dEIR must explain fully how each of the issues that are considered and evaluated relate to the *legislative intent of the CEQA law*. I have included the sections on legislative intent, Sections 21000 and 21001, for your convenience. Please relate each of issues considered in this dEIR to the legislative intent as defined in these sections, in your response to my comments.

05

Please send me a printed copy of the responses to comments on the dEIR. Thank you.

Sincerely,

Pinky Kushner  
1362 6<sup>th</sup> Avenue  
San Francisco, CA 94122  
415 731-9486  
[pinkykushner@mac.com](mailto:pinkykushner@mac.com)

.....  
CEQA was established to:

- inform governmental decision-makers and the public about potential environmental effects of a project;
- identify ways to reduce adverse impacts;
- offer alternatives to the project; and
- disclose to the public why a project was approved.

#### Chapter 1 POLICY

#### § 21000. LEGISLATIVE INTENT

The Legislature finds and declares as follows:

- (a) The maintenance of a quality environment for the people of this state now and in the future is a matter of statewide concern.
- (b) It is necessary to provide a high-quality environment that at all times is healthful and pleasing to the senses and intellect of man.



- (c) There is a need to understand the relationship between the maintenance of high-quality ecological systems and the general welfare of the people of the state, including their enjoyment of the natural resources of the state.
- (d) The capacity of the environment is limited, and it is the intent of the Legislature that the government of the state take immediate steps to identify any critical thresholds for the health and safety of the people of the state and take all coordinated actions necessary to prevent such thresholds being reached.
- (e) Every citizen has a responsibility to contribute to the preservation and enhancement of the environment.
- (f) The interrelationship of policies and practices in the management of natural resources and waste disposal requires systematic and concerted efforts by public and private interests to enhance environmental quality and to control environmental pollution.
- (g) It is the intent of the Legislature that all agencies of the state government which regulate activities of private individuals, corporations, and public agencies which are found to affect the quality of the environment, shall regulate such activities so that major consideration is given to preventing environmental damage, while providing a decent home and satisfying living environment for every Californian.

#### § 21001. ADDITIONAL LEGISLATIVE INTENT

The Legislature further finds and declares that it is the policy of the state to:

- (a) Develop and maintain a high-quality environment now and in the future, and take all action necessary to protect, rehabilitate, and enhance the environmental quality of the state.
- (b) Take all action necessary to provide the people of this state with clean air and water, enjoyment of aesthetic, natural, scenic, and historic environmental qualities, and freedom from excessive noise.
- (c) Prevent the elimination of fish or wildlife species due to man's activities, insure that fish and wildlife populations do not drop below self-perpetuating levels, and preserve for future generations representations of all plant and animal communities and examples of the major periods of California history.
- (d) Ensure that the long-term protection of the environment, consistent with the provision of a decent home and suitable living environment for every Californian, shall be the guiding criterion in public decisions.
- (e) Create and maintain conditions under which man and nature can exist in productive harmony to fulfill the social and economic requirements of present and future generations.
- (f) Require governmental agencies at all levels to develop standards and procedures necessary to protect environmental quality.

**From:** Gabriel Lampert <gabriel.nmsu@gmail.com>  
**To:** Don.Lewis@sfgov.org

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**Date:** Sunday, December 11, 2011 10:41PM  
**Subject:** Re: Questions on Beach Chalet soccer complex proposal draft EIR

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Thank you! And please add my name to those requesting an electronic copy of the final EIR.

Thanks again,

Gabriel Lampert  
[gabriel.nmsu@gmail.com](mailto:gabriel.nmsu@gmail.com)

On Mon, Dec 5, 2011 at 7:52 AM, <[Don.Lewis@sfgov.org](mailto:Don.Lewis@sfgov.org)> wrote:

Rec'd and I can open the attachment.

Thanks,  
Don Lewis  
Environmental Planner  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103  
ph: (415) 575-9095 fax: (415) 558-6409

Gabriel Lampert  
<[gabriel.nmsu@gmail.com](mailto:gabriel.nmsu@gmail.com)>

To

[bill.wycko@sfgov.org](mailto:bill.wycko@sfgov.org),

12/04/2011 08:25 PM [don.lewis@sfgov.org](mailto:don.lewis@sfgov.org) cc

Subject

Questions on Beach Chalet soccer  
complex proposal draft EIR

Hello. I am attaching some comments regarding the draft EIR for the Beach  
Chalet soccer complex proposal.

Please let me know that you received this, and also whether you are able to open and read the attachments.

Thank you!

Sincerely,

Gabriel Lampert  
695 48th Avenue, #1  
San Francisco CA 94121  
(415 ) 668-1226  
[gabriel.nmsu@gmail.com](mailto:gabriel.nmsu@gmail.com)(See attached file: Questions on Draft EIR.doc)



Date: 4 December, 2011  
 From: Gabriel Lampert, 695 48<sup>th</sup> Ave. #1, San Francisco CA 94121  
 To: Bill Wycko;  
 Don Lewis  
 Subject: **Questions re: Draft EIR on Beach Chalet Soccer-field proposal**

The Draft EIR notes two areas where impact is said to be “less than significant,” and that seems to conflict with my personal experience, so I am writing to ask for clarification:

1. Aesthetics: Having lived in a small town with a stadium, I know that the glare from the lights carries well over a mile. In the case at hand, that would include Land’s End, where the Parks Service has occasional star parties.

**\* Has this been addressed?**

**\* Will the EIR have an estimate for how far from the site the glare will shut out starlight?**

Likewise, residents already have experience with the glare from the lighting for the Outside Lands concerts every year, and it is not considered “less than significant” to many of those residents. It would appear to me that the soccer complex would have more of an impact, in that the lighting would be in use almost every night rather than just a weekend. In other words, what might be a small nuisance for two nights of a year might be a much greater one for, say, 100 nights of the year.

**\* Are you able to quantify the increase in impact for a constant over one-time source?**

2. Transportation: Here my personal experience has been on site. I have noticed that on sunny afternoons, especially on weekends, Esplanade parking is insufficient for beachgoers, who then cruise the Park looking for a parking spot. This not only takes up parking places but creates traffic jams on the Great Highway and JFK Boulevard. Also, on such good-weather days, attendance at the Windmill, the Queen Wilhelmina Garden, and Park Chalet all increase, again adding to the traffic. If there is a soccer game as well, then this also adds to the parking problem and to the traffic as well. On some days, I find it useless to take the 18 bus to get across the Park, say from my place on Balboa to the restaurants and shops on Judah. The bus simply stalls, so I walk instead – fine for me but not for those who aren’t up to the walk

I understand that there is to be increased parking at the complex, but will it be enough to handle the overflow from the beach and park as well? And if there is enough parking for all, there **will** still be increased traffic on all nearby roads. A popular soccer match (or tournament) might draw many people to the complex, and a sunny days clearly do drawspeople to both Park and beach. Therefore:

**\* Can you give me some figures on how traffic jams now on good-weather weekends compare with those we should expect if the project goes through?**

**\* What steps will be required if the roads cannot handle the increase?**

**\* Will they have to be widened?**

**\* And, if so, how much vegetation will have to be taken out?**

**\* About the 18 bus, will it have to be permanently re-routed as it is for one-time events?**

**\* If so, what will be done for those riders who will be impacted?**

I appreciate your attention to this matter. Thank you.

Date: 12 December, 2011  
From: Gabriel Lampert, 695 48<sup>th</sup> Ave. #1, San Francisco CA 94121  
To: Bill Wycko;  
Don Lewis  
Subject: **Questions re: Draft EIR on Beach Chalet Soccer-field proposal (2)**

Long-term environmental impact of locating the complex at the very edge of the city must include some estimate of the amount of automobile pollution over the course of decades.

**\* Can you estimate the level of impact of locating a major sports complex at the edge of the city on air pollution caused by automobiles?**

01

**\* Can you compare the environmental cost of locating the complex at the Beach Chalet vs. locating it closer to where soccer players actually live?**

02

**\* In particular, is there any idea of where players do live? If, say, it is the Pacific Heights/Laurel Heights/Presidio Heights area of the city, then can you compare the environmental impact of the Beach Chalet proposal vs. a location in the Presidio?**

03

**\* Can you compare the Beach Chalet location's impact vs. modifying the existing facilities at Kezar Stadium, which is far more centrally located?**

04

Thank you again for your hard work.

**From:** Eden Lang <edenlang@comcast.net>  
**To:** don.lewis@sfgov.org

---

**Date:** Monday, December 12, 2011 03:14PM  
**Subject:** BEACH CHALET ATHLETIC FIELDS RENOVATION

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BEACH CHALET ATHLETIC FIELDS RENOVATION  
Draft Environmental Impact Report  
Planning Department Case No. 2010.0016E  
State Clearinghouse No. 2011022005

Dear Mr. Lewis,  
I grew up in the Richmond District and was thrilled to be able to return here 20 years ago.  
I love the freshness of the air as it blows in from the ocean and over the trees and grass and flowers.  
If you go ahead with this project it will blow through plastic grass and crumbled tires.  
And it will really really blow because there will be even fewer trees to act as windbreaks.  
Does anyone who advocates this renovation live adjacent to this field?  
I don't think so.  
And after it's done, I wonder who would want to.  
Please please don't do this.  
"If it works, don't fix it."  
It works...  
I would also like to receive a printed copy of the Comments and Responses and the Final EIR by mail,  
and/or a copy by email.  
Please let me know that you have received this letter.

01

Sincerely,  
Eden Lang  
4444 Balboa St #302  
San Francisco, CA 94121



**From:** Nathan Lang [<mailto:nathanlang@comcast.net>]

**Sent:** Sunday, December 11, 2011 9:08 PM

**To:** [don.lewis@sfgov.org](mailto:don.lewis@sfgov.org)

**Cc:** [sfoceanedge@earthlink.net](mailto:sfoceanedge@earthlink.net)

**Subject:** Beach Chalet Athletic Fields Renovation

## BEACH CHALET ATHLETIC FIELDS RENOVATION

Draft Environmental Impact Report

Planning Department Case No. 2010.0016E

State Clearinghouse No. 2011022005

Dear Mr. Lewis,

I didn't speak up sooner because this is such an extreme, almost absurd plan that I assumed it would not survive serious public consideration for so long. I'm so angry I hardly know what to say. I just hope it's not too late for my strenuous objections to matter.

I've lived in this neighborhood for over 20 years. I love to walk all over Land's End, the beach, the park. I see the ocean, the windmills and the outer edge of Golden Gate Park out my window. This is the only part of the city where you can escape noise, crowding and congestion, breath fresh air. The rest of San Francisco is beautiful but it's always a relief to get back to the one neighborhood where nature hasn't completely lost any hold on the landscape.

Over the last decade a lot of trees have been chopped, bushes cleared and trails paved from Land's End to Golden Gate Park. The trees used to be thick enough to muffle the traffic noise from JFK Drive and the Great Highway. Now you can see headlights shining through the trees, and hear the same traffic noise you'll hear all over the City. Chop down several dozen MORE trees and feel the wind that howls off the Pacific, especially in the spring, no longer tamed by what used to be a wall of bushes and trees at the edge of the ocean. There's a reason why thick low growing trees were planted here in the first place, on what used to be miles of blowing sand.

Whoever could conceive or seriously consider a plan to so thoroughly degrade this last quiet corner of San Francisco obviously doesn't live here. I invite you to come take a walk through the western edge of the park after sunset, when the sky is glowing over the ocean, see the first stars winking down, maybe the moon poking up out of the trees to the east while its ghost light replaces the last embers of the sun. Or more usually,

**From:** Nathan Lang [<mailto:nathanlang@comcast.net>]

watch the world disappear into a cold gray blanket of fog while the foghorns sound mournfully in the gathering dark. This is a beautiful, magical place. The last urban refuge for those of us who really don't like cities, but somehow love San Francisco.

Pave over a few acres of grass, build TEN sixty foot light towers blazing away until 10PM EVERY NIGHT(!), surround the whole thing with a black plastic fence, you will really finish off the illusion of wilderness that is being destroyed bit by bit anyway.

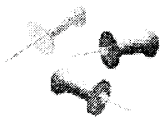
If there were no reasonable alternatives for kids to play soccer, I would swallow my discontent, remain quiet and hope the sound of children having fun would compensate for all that would be lost. But you can just renovate this field with real grass and forget the ridiculous lights, fix up the West Sunset Playground or come up with some other plan. You don't have to do this. So please don't.

Thank you,  
Nathan Lang  
4444 Balboa St #302  
San Francisco, CA 94121

02  
cont.

03

**From:** Nathan Lang [<mailto:nathanlang@comcast.net>]



Bill Wycko/CTYPLN/SFGOV  
11/28/2011 11:27 AM

To Don Lewis/CTYPLN/SFGOV@SFGOV, Sarah B  
Jones/CTYPLN/SFGOV@SFGOV  
cc  
bcc

Subject Fw: Comment about DEIR for soccer fields west end of GGP

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 11/28/2011 11:27 AM -----



Steve Lawrence  
<splawrence@sbcglobal.net>

To bill.wycko@sfgov.org  
cc

11/27/2011 09:28 AM

Subject Comment about DEIR for soccer fields west end of GGP

As a (former) soccer player I appreciate how wonderful artificial turf is to play on, at least when it is fairly new. I also much appreciate opportunities I've had in my life for recreation.

My primary purpose is to make sure you realize that the environmental community has been mobilized to oppose new artificial soccer fields.

You are certain to receive many comments from those reached by environmental organizers, who instruct their followers in what to do and say, and give rides to the meeting. Is governing by interest group in the public interest?

01

Whether you discount this well-organized push is up to you. Below is an email encouraging opposition comments.

Steve Lawrence

### **San Francisco Planning Commission**

**City Hall, Room 400, \*5:00 p.m. start\***

*(Written Public Comment due by December 12, 2011.*

*This is your LAST CHANCE to submit official comments on this project to the Planning Department!)*

**TO ALL SUPPORTERS OF GOLDEN GATE PARK:**



**This is the most important hearing this year – please plan to attend.** This project will replace natural grass in Golden Gate Park with over 7 acres of plastic grass and tire waste and install 150,000 watts of 60 foot tall stadium lights, next to Ocean Beach. The DEIR states that the soccer complex "would cause a substantial adverse change in the significance of a historic resource . . .", but the Recreation and Park Department is still continuing to pursue this project.

In fact, Rec and Park has already sent out an alert to their entire, city-wide contact list, asking them to attend this meeting and support the artificial turf and 60 foot lights. They have not mentioned your concerns about the impact on Golden Gate Park and Ocean Beach or even the fact that there is opposition to this project! The Beach Chalet Athletic Fields are not an approved project, and the Department should not be using the power and resources of the City government to push through a project that is running against the wishes of so many of our residents.

Your presence will show the City government that you are concerned about the loss of parkland in Golden Gate Park, and you are willing to act on that concern. **This is your EIR – you fought for it – come to the hearing and speak!**

**[Click here to fill out a form and let us know that you will be attending this hearing.](#)** If you cannot get to City Hall on public transit, we will try to arrange a ride for you. If you can help with rides, let us know.

Follow this link for the **[Hearing agenda](#)** . We will also post updates on **[our website](#)** as they become available.

**WRITTEN PUBLIC COMMENT - due December 12, 2011**

Written comments on the Draft EIR are due by 5:00 p.m. on December 12, 2011. Even if you come to the hearing, it is important that you send in written comments. These comments will become part of the written record and will be published in the Final EIR. You will have three minutes at the Planning Commission, but your written comments can be as many pages as you feel like writing. **YOU DO NOT HAVE TO LIVE IN SAN FRANCISCO TO COMMENT ON THIS PROJECT.**

*Click here for more information on the DEIR and how to comment.*

*Check our website for more information on this project and what you can do to protect Golden Gate Park .*

**PLEASE PRINT OUT THE ATTACHED FLYERS. POST in your local coffee shop and GIVE to your friends and neighbors.**

Thank you, everyone!

SFOE

Deborah Learner  
 45 El Pavo Real Circle  
 San Rafael, CA 94903  
 Dlearner@juno.com

November 29, 2011

Environmental Review Officer  
 Beach Chalet Fields Renovation  
 San Francisco Planning Department  
 1650 Mission Street, Suite 400  
 San Francisco, CA 94103

To Whom It May Concern:

I would like to provide the following comments and observations regarding the Beach Chalet Athletic Fields Renovation, Draft Environmental Impact Report. My review has been tempered by the fact that I was the Recreation and Park Department Park Planner and Capital Project Manager, (1978 – 2001), managing all phases of Golden Gate Park master planning, and capital project management during that period.

**GGPMP Issues/Project Approvals/Historic Significance:**

1. II-5: Project Sponsor's Objectives: Remain Consistent with Golden Gate Park Master Plan (GGPMP). As noted elsewhere in the DEIR, installation of field lights at the Beach Chalet Soccer Field is not consistent with the GGPMP. It might be noted that the project sponsor's objectives are somewhat contradictory. 01
2. II-24 Project approvals: This section only mentions that the Recreation and Park Commission would be required to give project approval. It would be more complete to mention that a Determination of Consistency with GGP Master Plan would be required. In addition a GGP master plan amendment may also be required because currently, the installation of athletic field lighting at the Beach Chalet Soccer Field is not consistent with the GGPMP. 02
3. III-9 Lighting: The paragraph at the top of the page makes an assumption that night lighting wasn't considered for the Beach Chalet Soccer Fields because "the fields were already at or beyond their use limits for proper maintenance". However, in considering possibilities at the time of the Master Plan's preparation, night lighting was not suggested for the Beach Chalet Soccer fields as it was also considered inappropriate to the park environment and out of character for the west end of GGP. The GGPMP, 3-21 also states that night lighting should not detract from the character of the Park, a statement that should also be included in this review of GGPMP policies. 03
4. IV-B-15: The Golden Gate Park Master Plan (GGPMP) **does not** identify the Beach Chalet Soccer Fields as a night use area. Only the restaurant is identified as such. Please correct this fact in your narrative and include the map from page 9-5 from GGPMP to show what was in fact approved in the GGPMP. Furthermore, field lighting at the Beach Chalet Soccer Field was not even included in the list of "potential" night use areas. It is also clear that the GGPMP West End Special Area Plan (DEIR Figure on IV.E-12) does not recommend soccer field night use. 04



5. ES-9: The Table ES-1: Summary of Impacts and Mitigation Measures, could provide more information in the cultural resources section, mentioning the various project components that would serve to create an adverse impact on the Beach Chalet Soccer Field as a contributing element to the GGP historic district

05

6. IV.C-14-24: Historic Significance. In discussing historic significance and cultural resources, this section emphasizes the overriding policy of the GGPMMP – to “respect the unique design and character of the park”, and “The major design feature within which all park activities occur is its pastoral and sylvan landscape”. Design features, such as artificial turf and athletic field lighting might well be suitable at other recreation sites. However, because of Golden Gate Park’s unique and historic landscape and status, the proposed project would create a significant adverse and unavoidable impact, (IV.C-27).

06

The EIR, possibly in the cumulative impacts section, should also mention that the installation of athletic field lighting and artificial turf would be a major precedent setting move. These project elements would erode the character of the park and conceivably set the stage for the installation of athletic field lighting and artificial turf in other areas of the park. The future implications of this project should be questioned and examined in the EIR and by decision makers.

07

It would be relevant to point out in the EIR that Central Park, America’s flagship urban park, and the progenitor of Golden Gate Park, does not have athletic field lighting for night use, neither has it installed artificial turf. Clearly, while the demand for field use is as great or greater in New York than here in San Francisco, the historic character of Central Park has been preserved.

7. IV-C-24: In the paragraph beginning “As described above”, the fact that the Beach Chalet is identified as a “Night Use Area” is confusing and out of place relative to a discussion on recreational field lighting. If left in, this phrase should be further clarified to mention that the night lighting designation only refers to the immediate restaurant area, (again GGPMMP page 9-5 is relevant). The paragraph correctly notes at the end that the Beach Chalet Athletic Fields have had no historical precedent with regard to electrical illumination. The remainder of this section makes it clear that the impact of the field lights would be significant.

08

8. IV.H-9: Project Approvals, Maintenance/funding: What does the Department's gift policy say about the maintenance of gifts and replacement of a capital expense – i.e. turf replacement? This should be mentioned in the EIR under project approvals and project description. Is there a capital trust/gift account to make such funds available – bequest perhaps? Did the MOU between the Department and the fund donor establish such a mechanism?

09

9. IV-5: Re: Recycled water project/ Richmond Sunset Treatment Plant Site.(RS) Currently the GGPMP Special Area Plan for the Richmond Sunset Treatment Plan Site (GGPMP, 13-10) proposes construction of an additional soccer field at the site, in addition to a screened log storage area.. The Master Plan also notes that if a reclaimed water treatment facility is constructed at the RS site, the Recreation and Park Department has required that the facility be completely underground with a recreational use on top. The EIR should address the following issues: Will the recommendation that an additional soccer field proposed in the GGPMP at the RS plant site be abandoned with this expanded use at the Beach Chalet Field? Will the GGPMP be amended to reflect this alteration?

10

10. Map Figure IV-A-1: Show and label debris/composting facilities on Overlook Dr. It would be more thorough for the figure to indicate the areas now used for debris processing which include the Richmond/Sunset site (RS) and at the Overlook Reservoir site. The GGPMP intended green debris to be taken to Overlook Drive atop and along side of the new reservoir, which has been constructed with infrastructure bond funds. What is the status of the Overlook Reservoir, and the Overlook composting operation?

11

#### Usage:

11. II-10-11, 23, Table II-2: The amount of new seating proposed is not consistent. The table cites “up to 1046”. The illustrative concept plan indicates 1,104 seats. The anticipated maximum attendance is 288 per reservation period. The amount of seating proposed (1104+) does not seem justified given the current and projected attendance. The EIR should provide more information about attendance at current and projected tournament events, and why the amount of additional seating is justified. It would be helpful to understand what arrangements spectators make currently for seating for regular games and tournament events.

12

#### Design issues/Water Quality/ Hazardous Materials:

12. IV.C-23: The discussion of what would constitute an acceptable ADA walking surface is somewhat confusing, like a catch-22. It would be interesting to know what is being used throughout the park now, and throughout the park system that has satisfied the ADA requirements. I would be curious to know if turf block options have been considered that would be both stable and permeable? The mitigation in ES-1 under the cultural resources section mentions naturalistic surface material. If the suggested materials are not ADA acceptable, then this proposed mitigation measure would not appear to be valid.

13

14

13. II-14, IV.G-25: These sections describe the rainwater catchment basin and the mechanism whereby collected rainwater would be allowed to percolate into the ground water basin. The EIR should provide a more complete picture of this concept by showing a profile, or cut-a-way drawing of the underground basin, (as well as the layers of the below surface infrastructure), indicating its capacity and showing the location of the gate valves or other mechanisms that would manage these flows. Would it be the job of a stationary engineer to manage this aspect of the field operation and maintenance?

15

14. Section IV discusses in some detail impacts to biological resources, primarily vegetation and wildlife, due to the expansion of the fields and the installation of artificial turf. Health hazards and water quality concerns of the proposed turf materials are also discussed at length. However, I did not see any mention of how the infill material of polyethylene styrene butadiene rubber (SBR) also known as "crumb rubber" might be dispersed into the surrounding soils and vegetation, and how this material might impact soils, vegetation and be taken up/ingested by wildlife. How quickly do the SBR crumbs dissipate and how frequently does the SBR or "crumb rubber" need to be replenished on the field? These are concerns that should be covered in the EIR.

16

15. IV.B-16-33: It would be helpful to see a map identifying the locations of the viewpoints used in evaluating the view impacts of the field lights. It would also be helpful to see an additional nighttime field lighting simulation of the proposed Beach Chalet Soccer Field lights from Ocean Beach/ Great Highway, which is in relatively close proximity to the athletic field.

17

18

#### **Feedback from Existing Installations**

16. How successful has the artificial turf been in other parks from the viewpoint of players, maintenance staff, and neighbors? If appropriate in the EIR, it would be helpful to get a picture of demand for fields with artificial turf, (as compared to grass turf), and statements/ opinions of playability from players. Have maintenance issues such as drainage and vandalism been problematic? Have there been complaints from neighbors, and how have these been addressed.

19

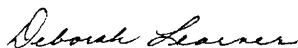


**Operation/Use guidelines:**

17. Project mitigations can also be codified in well-conceived and well-managed operation/permit guidelines. Such guidelines would update the existing Beach Chalet use/permit guidelines and would address issues such as:
- a. Night Lights: Use guidelines could require a night use permit. If a permit was not issued, the lights could be turned off, thereby saving energy and minimizing the impact of the field lights on the surrounding landscape.
  - b. What is the carrying capacity of the fields?
  - c. Management and scheduling of tournaments. - How are these handled currently and how will they be regulated in the future? Would they be at night in the future, or daytime on Sat/Sun? This can be spelled out in the permit guidelines.
  - d. Such guidelines should be clear that amplified sound is not permitted. Amplified sound would be extremely disruptive in the park's west end.
  - e. Guidelines should indicate coordination of activities so that scheduling of larger events will avoid conflicts with other planned events, both within the park and within and between the GGNRA jurisdiction of Ocean Beach/Great Highway.
  - f. The Kezar Stadium scheduling and permit guidelines might provide a reference for the preparation of Beach Chalet Field guidelines.

While the Environmental Review document is analytical, and dissects the project into its component parts, decision makers must take a comprehensive and long-range perspective. I am hopeful that the Recreation and Park Commission will select the Project Alternative that remains consistent with the Golden Gate Park Master Plan and safeguards the unique character of Golden Gate Park.

Very Truly Yours,



Deborah Learner

Attachments: Golden Gate Park Master Plan, pages 9-5, 13-5, 13-6

## Park Lighting

The existing lighting system in the park is antiquated and in need of replacement. Pedestrian scaled replacement lighting is proposed for selected paths and roads to provide a minimum safety "beacon" lighting system. The proposed lights would consist of an acorn-style luminaire on a traditional pole (approximately 16' high). The luminaire would likely be color corrected high pressure sodium (150, 100, or 70 watt) which is the most energy efficient for outdoor lighting. The light is similar to lights used elsewhere in San Francisco, including those on the Embarcadero project.

Different areas of the park will be lighted to different levels based on amount of use and safety considerations. Lighting is for safety purposes and is not intended to increase night use.

The proposed park lighting is divided into the following priority levels:

### Highest priority/lighting level:

- pedestrian night use areas (including connections between evening activity areas, parking, and Muni stops)
- pedestrian/vehicle/bike intersections
- roadways with heavy night use

### Medium priority/lighting level:

- pathways to night use areas
- roadway intersections
- selected park roads

### Low priority/minimum lighting level:

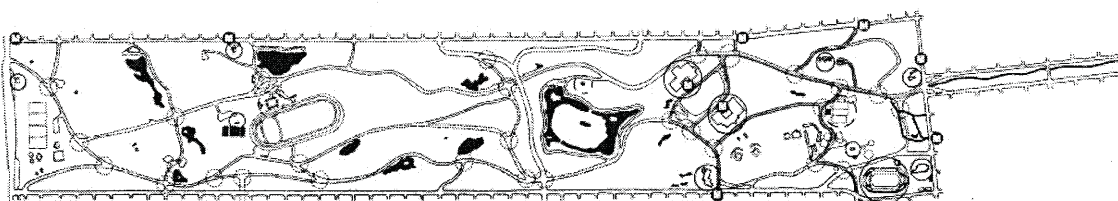
- all other park roads (this level provides minimal lighting between fixtures, but the next "beacon" light can be seen from roadways)

### Night use areas include:

- McLaren Lodge
- Kezar Pavilion
- Kezar Stadium
- Sharon Building
- Conservatory
- Academy of Sciences
- deYoung Museum/Asian Art Museum
- County Fair Building
- Senior Center
- Beach Chalet
- Angler's Lodge

### Potential night use areas:

- Tennis courts
- Pioneer Log Cabin
- Equestrian center



### Legend

- |   |  |
|---|--|
| ○ Night use areas                           | —— Primary access roads and adjacent paths to night use areas (highest priority) |
| ○ Potential night use areas                 | —— Path access to night use areas (highest priority)                             |
| ○ Important intersections (medium priority) | ● Muni stops serving night use areas   |

## West End Plan

The western edge of Golden Gate Park has lacked activity centers to draw people to use it. With the exception of the Queen Wilhelmina Garden and the soccer fields, most of the west end is little visited and is not an inviting area. Undesirable uses such as camping and sexual activity have filled the void, aided by dense growing shrubs. The goal of this area plan is to increase legitimate activities and transform this part of the park. Rehabilitation activities will include the following:

**Beach Chalet.** The major improvement will be the restoration of the Beach Chalet as a western park visitor center, with a cafe and environmental retail area upstairs. The Beach Chalet will become a destination for park visitors, attracted in part by the spectacular WPA-era murals on the first floor. (rehabilitation has been approved)

**Western Park Frontage.** The western park frontage along the Great Highway has been long neglected. The important role as the first line of the park's windbreak has taken priority over landscape design in this area. With completion of sewer construction and the redesign of the Great Highway and its landscaped path, the park's western frontage is in need of attention. The relocated edge of the Great Highway has defined a new edge for the park. Asphalt areas within the curb will be removed, leaving expanded landscape areas that will allow new landscape treatments at the two western entries. The existing Great Highway multi-use trail, which runs from Lincoln Way to the zoo, will be extended along the park frontage to Fulton Street.

**Old Railroad Trail.** The old railroad trail cuts across the western end of the park and passes through the dense growth of shrubs between the Great Highway and the soccer fields. Many of the undesirable activities occur along this trail, and park users avoid the area. This plan calls for improving the visibility and security of the trail by opening the corridor along the trail and creating a series of linear turf meadows. The meadows will attract more users and the turf areas will increase the presence of gardeners and other employees. With increased activities at the Beach Chalet, at both windmills, and in the general area, the trail will see much greater use which will discourage the undesirable activities.

**Western Windbreak.** The vegetation in the western edge of the park serves the vital role of acting as a windbreak, making the rest of the park more suitable for activities and able to support a wider variety of trees and shrubs. The western windbreak is being reforested, and will eventually replace some of the dense shrub areas with forest trees.

**Murphy's Windmill and Millwright's House.** The historic south windmill was built in 1906 to pump well water to other areas of the park. It has fallen into disrepair, its sails have been removed and the structure is deteriorating. This plan calls for its restoration similar to that of the north windmill. Both windmills are highly visible features of the west end and their condition reflects on the condition of the park. The millwright's house, adjacent to the south windmill, dates from 1909 and is currently used as a caretaker's residence. The building requires

structural and accessibility improvements to make it usable for a new park use. Funding for renovation and a new permanent use should be sought due to the structure's historic significance and relationship to the windmill. A preservation alternative may include a west end pavilion as part of the area improvements (approved for 2,500 sf).

**West End Pavilion.** A site near the windmill has been identified as the location for a new pavilion structure with visitor services for this area of the park. The structure would include space for public meetings, a kitchen, restrooms, a food concession, and a skate/bike rental or other concession.

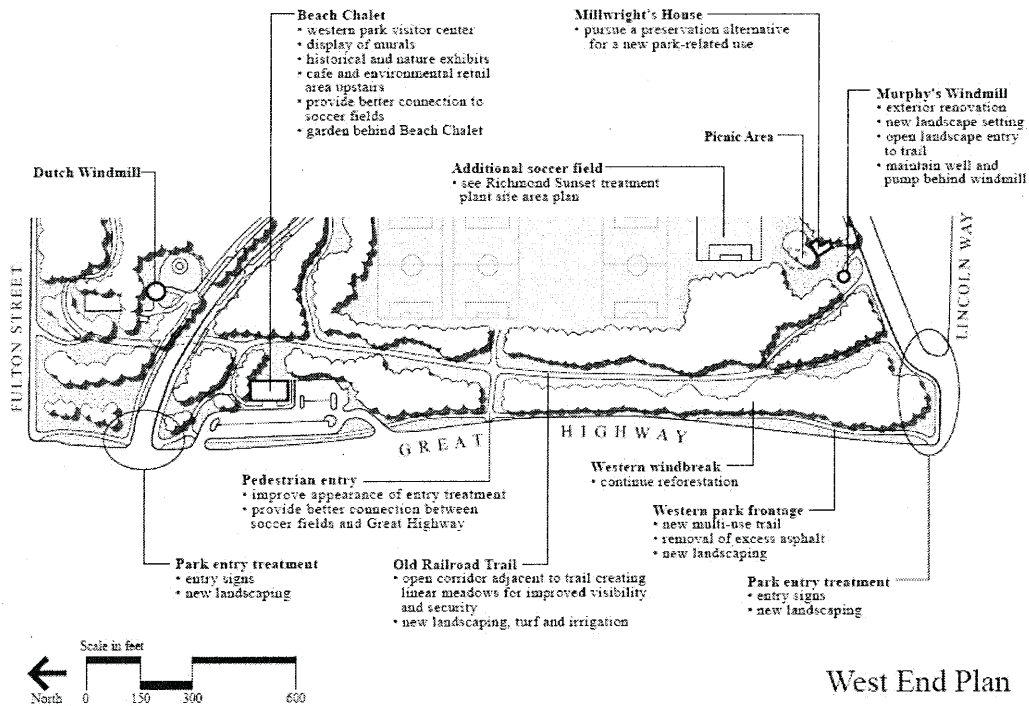
**Western Park Entries.** The two major entries in the western end, at the Great Highway and at Lincoln Way, have received new entry signs and landscape treatment with funding from the 1992 Golden Gate Park Infrastructure Bond. The appearance of the pedestrian entry from the Great Highway will be improved and will provide a better connection between the Great Highway and the soccer fields.

**Richmond Sunset Treatment Plant Site.** The site of the sewage treatment plant will be cleared of the existing buildings and structures and it will be available for redevelopment as parkland. See the special area plan for this site for plan recommendations.



## Golden Gate Park Master Plan, Page: 13-6 West End Plan

## GOLDEN GATE PARK MASTER PLAN



West End Plan



Bill Wycko/CTYPLN/SFGOV  
12/01/2011 11:08 AM

To Don Lewis/CTYPLN/SFGOV@SFGOV, Sarah B  
Jones/CTYPLN/SFGOV@SFGOV  
cc  
bcc  
Subject Fw: Beach Chalet Soccer Fields

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 12/01/2011 11:08 AM -----



Lex Leifheit  
<leifheit@gmail.com>  
12/01/2011 09:08 AM

To bill.wycko@sfgov.org  
cc carmen.chu@sfgov.org, katy.tang@sfgov.org  
Subject re: Beach Chalet Soccer Fields

Dear Mr. Wycko,

My husband and I just purchased a home in Outer Sunset, near the soccer fields, and I am writing to oppose a Beach Chalet Soccer Fields renovation that would add significant artificial light after sunset.

I work at a cultural center in South of Market and love city life. The natural beauty of the western edge of the park at sunset where it meets the beach contributes to the vibrant city/nature contrasts in San Francisco ... one of the elements of this city that make is to unique and magical. Having facilities accessible to youth is critical, but the natural beauty of Golden Gate Park should be protected.

I am unavailable to attend the hearing and am emailing you at the suggestion of an article in the Ocean Beach Bulletin.

Sincerely,

Lex Leifheit

01  
02



Larry Letofsky  
<letofsky@earthlink.net>

12/07/2011 10:25 AM

To sfoceanedge@earthlink.net, bill.wycko@sfgov.org,  
don.lewis@sfgov.org

cc

bcc

Subject Beach Chalet Soccer Fields - DEIR comment letter

Every walk I take I pass by the soccer fields, no persons about....just birds, wind, sun, bright grass, sometimes fog, surrounded by trees....noises of the ocean and birds...and I am quiet ....On other days, when the fields are filled with players, I watch the games briefly....children or adults with their colors, running and laughing....This park, once sand, is a monument. This park seems sacred....I rather see it become sand again, with natural plants...than be harmed. Our world has so little free space, too many fences, too many lights, that we can barely see the stars.

01

Let it be

Larry Letofsky



Beth Lewis  
571 25<sup>th</sup> Avenue  
San Francisco, CA 94121

December 4, 2011

Mr. Bill Wycko  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission St. Room 400  
San Francisco, CA 94103

Subject: BEACH CHALET ATHLETIC FIELDS RENOVATION  
Draft Environmental Impact Report  
Planning Department Case No. 2010.0016E  
State Clearinghouse No. 2011022005

Dear Mr. Wycko:

I oppose the proposal to renovate the Beach Chalet Athletic Fields with artificial turf and stadium lights. It is inconsistent with The Golden Gate Park Master Plan. I support the Compromise Alternative put forth by the public during the Planning Commission hearing of December 1, 2011. The Compromise Alternative is to renovate the Beach Chalet fields with natural grass and no lighting and to renovate the West Sunset Playground to provide more hours of play for youth soccer. 01  
02

I find the Draft Environmental Impact Report to be deeply flawed. I have the following concerns, which I would like to see addressed:

I am concerned that the City is rushing into this project without fully considering the negative impacts to the park and the environment: Cutting down many mature trees that serve as a wind break and sacrificing a benign, bucolic grass field and covering it with an artificial, potentially toxic substance without fully considering: 03

- Installation of artificial turf with its human health implications and environmental non-sustainability. 04
- The composition of the artificial turf. 05
- How the artificial turf will be handled at the end of its life, in 8 to 10 years. 06
- How can we be sure that any company that installs the artificial turf will be financially viable in 8 to 10 years to recycle it?
- What will be the impact on the environment if the artificial turf starts to break down and there is no money to replace it? Will the artificial turf be left in place to degrade? 06

I am also very concerned about Light Pollution: We are so lucky in San Francisco to be able to go to areas in and near our city that are very natural. This is a precious gift that we must protect! The impact of intense night lighting on an area of Golden Gate Park that has been naturally dark since it was established should be protected. Fog can increase the amount of light reflected from this type of lighting. Since this part of San Francisco is known for its fog, the potential is great for light pollution from the field lights. Birds, mammals, and the insects they feed on, can be negatively affected by extensive night lighting. 07  
08

This type of soccer field for San Francisco may have its merits, but would be inappropriately located in this part of Golden Gate Park, possibly in any part of Golden Gate Park. This is a "taking" of public parkland from the many and giving it to one interest group. Construction of this project in this sensitive area would seal its fate as an intensely lit, artificial environment designated solely for the enjoyment of Bay Area soccer players. Also, this project will attract players and spectators from a variety of locations, both in and outside of San Francisco who must drive automobiles to the Beach Chalet Athletic Fields due to the distance of this soccer field from public transit. This is contrary to transit-first goals for San Francisco. 09

Finally, this project is OUT OF CHARACTER WITH THE PLAN FOR THE WEST SIDE OF GOLDEN GATE PARK which designates this area as wild and forested. The public comment period should be extended at least 60 days, so that more citizens have time to review the DEIR and to submit their comments on the project. 10

Sincerely,

Beth Lewis

**RECEIVED**

DEC 14 2011

**CITY & COUNTY OF S.F.**  
PLANNING DEPARTMENT  
M E A

December 9, 2011

Nancy Lewis

1339 27<sup>th</sup> avenue

San Francisco California 94122

Subject: Beach Chalet Athletic Fields Renovation

Draft Environmental Impact Report

Planning Department Case No 2010.0016E

State Clearinghouse No 2011022005

Dear Mr. Wycko,

I live in the Sunset and am totally opposed to the proposal to renovate the Beach Chalet Fields with artificial turf and stadium lights that will burn until 10pm. I do support child soccer and support the compromise alternative to renovate the fields with natural grass but no lighting and renovate the Sunset Playground as a better alternative for soccer. As a nurse practitioner working with children and teens , I definitely support healthy sports and better community sports fields for our kids. But by concentrating so many fields at the upper end of Golden Gate Park , you are inviting traffic jams and over use of a open accessible area for all residents. Living so close to the Park, I can tell you how congested, noisy and over-crowded it gets with the City "Out-Landers" music festival for three days. By placing four soccer fields and keeping the site open until 10 pm everyday invites more congestion and the possibility of a new parking facility that can handle traffic created by this massive sports project.

01

02

I believe our communities are better served by renovating smaller sites in each district to facilitate soccer play by our children. They will be accessible to local schools and parents won't have as far to drive and pick up their kids.

03

Thank You

Sincerely,

Nancy Lewis, FNP



Reddy Lieb  
50 Dolores Terrace  
San Francisco, CA94110

December 5, 2011

Mr. Bill Wycko  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission St. Room 400  
San Francisco, CA 94103

Subject: BEACH CHALET ATHLETIC FIELDS RENOVATION  
Draft Environmental Impact Report  
Planning Department Case No. 2010.0016E  
State Clearinghouse No. 2011022005

Dear Mr. Wycko:

Don't destroy our beautiful, natural and wild habitat in Golden Gate Park and replace it with a plastic environment.

I strongly oppose the proposal to renovate the Beach Chalet Athletic Fields with artificial turf and stadium lights. It is inconsistent with The Golden Gate Park Master Plan. I support the Compromise Alternative put forth by the public during the Planning Commission hearing of December 1, 2011. The Compromise Alternative is to renovate the Beach Chalet fields with natural grass and no lighting and to renovate the West Sunset Playground to provide more hours of play for youth soccer.

01

I find the Draft Environmental Impact Report to be deeply flawed. I have the following concerns, which I would like to see addressed:

I am concerned that the City is rushing into this project without fully considering the negative impacts to the park and the environment: Cutting down many mature trees that serve as a wind break and sacrificing a benign, bucolic grass field and covering it with an artificial, potentially toxic substance.

02

I am also very concerned about Light Pollution: People living in the surrounding areas as well as birds, mammals, and the insects they feed on, will be negatively affected by extensive night lighting.

03

Finally, this project is out of touch with the natural environment and the area is designated as wild and forested. The public comment period should be extended at least 60 days, so that more citizens have time to review the DEIR and to submit their comments on the project.

04

Sincerely,

Reddy Lieb

**From:** Ron Lissak <RLissak@catapultadvisors.com>  
**To:** "bill.wycko@sfgov.org" <bill.wycko@sfgov.org>  
**cc:** "don.lewis@sfgov.org" <don.lewis@sfgov.org>, "c\_olague@yahoo.com" <c\_olague@yahoo.com>, "rm@well.com" <rm@well.com>, "wordweaver21@aol.com" <wordweaver21@aol.com>, "plangsf@gmail.com" <plangsf@gmail.com>, "mooreurban@aol.com" <mooreurban@aol.com>, "hs.commish@yahoo.com" <hs.commish@yahoo.com>, "rodney@waxmuseum.com" <rodney@waxmuseum.com>, "linda.avery@sfgov.org" <linda.avery@sfgov.org>

---

**Date:** Monday, December 12, 2011 12:19PM  
**Subject:** Beach Chalet--Please allow the renovation to start ASAP

---

Dear Mr. Wycko:

My name is Ron Lissak and my family and I live in the Richmond. We love San Francisco for many reasons, but principal among them is the genuine diversity a world-class city like San Francisco has to offer. One of the downsides of that diversity in such a densely populated area is that people do not often agree on certain topics and the NIMBY crowd can be very organized and vocal. One of our close family friends is on the other side of the Beach Chalet issue so I really understand their perspective.

I am nevertheless taking time out of my workday to write you in support of the renovation because, as the father of three school-age children who regularly play on the fields throughout the city, I am certain that the right side of this issue is the one that promotes healthy lifestyles for our youth.

There is no doubt that artificial turf is what makes the difference between being able to play and getting rained out when the weather is inclement (which seems to be increasing in recent years). Childhood obesity is a real problem, and having kids stuck at home in front of a TV because there is no place to let them play--even when it has rained--is avoidable. One of my children has seen this firsthand. He plays soccer at the wonderful fields at Crocker Amazon and he plays Lacrosse at Kimbel. Both are amazing, but they often have to play at odd hours because there are never enough slots--not to mention the extra gas one needs to consume to get there from the other side of town.

I commend you on the thorough review you and your colleagues have done on the impact this renovation would have on the environment and the steps that you have taken to minimize the negative impact it would have on the neighborhood. I strongly urge you to move forward with this wonderful enhancement to the city we all love.

Respectfully,

Ron Lissak  
168 25th Avenue  
San Francisco, CA 94121  
(415) 515-6105



I-Litehiser

**From:** Bill Wycko/CTYPLN/SFGOV  
**To:** Don Lewis/CTYPLN/SFGOV@SFGOV, Sarah B Jones/CTYPLN/SFGOV@SFGOV

---

**Date:** Monday, December 12, 2011 12:55PM  
**Subject:** Fw: Public Comment on Beach Chalet Soccer Field DEIR

---

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 12/12/2011 12:55 PM -----

**Linda Stark Litehiser**  
<linda.litehi@gmail.com>

Tobill.wycko@sfgov.org

cc

Subject Public Comment on Beach Chalet  
Soccer Field DEIR

12/12/2011 12:23 PM

Dear Mr. Wycko, I attended the hearing on Dec. 1st but arrived too late to testify. I am attaching the letter that I would like to submit for public comment.

Best regards, Linda Stark Litehiser

--

Linda Stark Litehiser  
78 Havelock St.  
San Francisco, CA 94112  
415-585-8005  
415-516-9224 cell  
(See attached file: Beach Chalet soccer fields.docx)

Attachments:

Beach Chalet soccer fields.docx

Mr. Bill Wycko, Environmental Review Officer  
 San Francisco Planning Department  
 1650 Mission St., Suite 400  
 San Francisco, CA 94103

December 1, 2011

Re: DEIR Beach Chalet Soccer Field Proposal

Dear Mr. Wycko and staff

I am writing to you as a concerned 40+ year resident of San Francisco. I am very much **opposed** to the plan to install artificial turf and sports lighting at the site known as the Beach Chalet Soccer Fields.

For many decades I have been an active volunteer with our parks system. I have been a tireless advocate for the parks and spend most of my free time attending meetings, working on park projects and helping to lobby for funding.

Golden Gate Park is a special unique place. We need to protect it. The plan to put artificial turf and stadium lights at this ocean site is not well thought out and could greatly alter the park for years to come. Here are the points that I would like to stress:

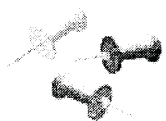
- This space should be kept natural, with real grass or ground covering. The area should maintain its wildness and openness. As was originally set forth in the master plan for Golden Gate Park. It is well loved for its natural setting. 01
- The choice to make these fields into a soccer only facility would limit its use by other sports, other activities picnicking, kite flying and even passive activities like sitting in the grass. 02
- If the soccer fields are desired they should be grass fields. We have plenty of artificial fields in the park system and we are in danger of converting all our fields to this type of turf. People desire grass fields as well. 03
- We don't know the long term maintenance of these fields. We have only had such fields for less than 10 years. The long term wear and tear is unknown and repairs will be needed as times goes on. Once these fields begin to deteriorate we could find ourselves in another budget crisis but we won't have the option to replant grass or let the fields become a natural area in the park. This decision will impact this area of the park for generations to come, without flexibility. 04
- There are plenty of synthetic turf fields in San Francisco and a new one planned for the Minnie and Lovie Ward Recreation Center in the Ocean View neighborhood. If we are concerned about our children having opportunities to play on them, then we should focus on limiting league (especially out of town league) play and schedule more time for kids. 05

I was present at the grand opening for the new synthetic fields at Crocker Amazon Park. There were lots of people who loved the new fields and were excited about the chance to play on them. One older gentleman came up to me and in broken English, he asked why we had done this. I gave him the standard arguments about how it was cheaper and easier to maintain that it would save money and water and give us more time for play. He sadly shook his head and literally with tears in his eyes, he touched the surface and said. "This is wrong" ....He had played soccer his entire life on grass and loved that experience. I did my best to assure him that this was just one synthetic field and the city was determined to maintain many grass fields as well. There would always be grass fields. Now I'm not so sure. We seem determined to lay plastic over every field we can find.

How many times have San Franciscan's lamented about precious things that have been lost to "progress" or expediency? We are awash in memorabilia and books about our history. If passed I predict this will be one more regret that people will talk about. We had a choice and we made the wrong one.

Sincerely yours,

Linda Stark Litehiser  
78 Havelock St.  
San Francisco, CA 94112



Bill Wycko/CTYPLN/SFGOV  
11/30/2011 05:18 PM

To Don Lewis/CTYPLN/SFGOV@SFGOV, Sarah B  
Jones/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: YES on 2010.0016E Beach Chalet Athletic Field

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 11/30/2011 05:18 PM -----



"ricolivas@juno.com"  
<ricolivas@juno.com>  
11/30/2011 07:59 AM

To dangelo60@aol.com

cc bill.wycko@sfgov.org, sean.elsbernd@sfgov.org,  
mark.farrell@sfgov.org

Subject Re: YES on 2010.0016E Beach Chalet Athletic Field

Ditto for me. Please support this project. Too many athletes, adults, children, men and women have injured themselves at Beach Chalet because of its condition.

01

----- Original Message -----

From: Dangelo60 <dangelo60@aol.com>

To: bill.wycko@sfgov.org

Cc: sean.elsbernd@sfgov.org, mark.farrell@sfgov.org

Subject: YES on 2010.0016E Beach Chalet Athletic Field

Date: Wed, 30 Nov 2011 00:31:00 -0500 (EST)

Respectfully,

The site should be developed with Lights as well as Artificial Turf.

As a 69 year old native San Franciscan including four generations of soccer players utilizing the BC and enduring gofer hole injuries to both myself / family and the SF High School teams I've coached, It is time to bring this Historic Soccer Football site into the modern era. Participation has grown exponentially since the Military gave up its small space and the Pitch ( Field) count grew by 50% ( from 2 to 3).

All manner and form of creative gardening has not solved the increased use and resulting lack of turf.

Even the creative mixture of sawdust and dirt in front of the Goals was a bust.

As for lights- again a must since it permits greater use of a facility and spreads the cost of maintenance per use hour.

As for the effect of lights on migratory birds- birds figure these things out. They have for a long time. Cities have developed where once there was open space. Ball parks have had lights for years. The swallows return to Capistrano. And the small homing pigeon community in the Sunset has their birds fly home from great distances that I'm certain is lighted by a Mall or TWO. A city or two. and several lighted used car lots.

They are already coming . Build it.

Jack E D'Angelo  
60 Beachmont Dr.  
SF, CA 94132



I-Lockwood

**From:** Dan Lockwood <dan@dezela.com>  
**To:** bill.wycko@sfgov.org, don.lewis@sfgov.org  
**cc:** c\_olague@yahoo.com, rm@well.com, wordweaver21@aol.com, plangsf@gmail.com, mooreurban@aol.com, hs.commish@yahoo.com, rodney@waxmuseum.com, linda.avery@sfgov.org

---

**Date:** Monday, December 12, 2011 12:15PM  
**Subject:** Fwd: Seeking Planning Commission Contact Info - Beach Chalet

---

Bill Wycho  
Environmental Review Officer  
SF Planning Department

Dear Mr. Wycho,

As a parent of three young children living in San Francisco, I want to express how important it is to provide more usable field space for the children of this city.

I'm also a coach for the San Francisco Riptide youth lacrosse club. During my role as a coach, we've often been given access to the fields at Beach Chalet, especially during the early spring months of February and March. I can recall many seasons where our designated practice times were rained out 80% of the time due to unusable, wet grass fields.

The citizens of San Francisco need high-use, artificial turf fields at the Beach Chalet location. Given the almost constant use of other artificial turf fields in San Francisco (Crocker Amazon, Kimbell, etc), it should be clear there is a serious need for more usable field space.

Please take the step to approve the DEIR for the Beach Chalet so our children can have more usable field space. Thank you very much.

Kind regards,

Dan Lockwood  
1119 Castro Street  
San Francisco, CA 94114  
415-359-6009

01

I-Louey

**From:** Bill Wycko/CTYPLN/SFGOV  
**To:** Don Lewis/CTYPLN/SFGOV@SFGOV, Sarah B Jones/CTYPLN/SFGOV@SFGOV  


---

**Date:** Monday, December 12, 2011 04:29PM  
**Subject:** Fw: Save Golden Gate Park

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 12/12/2011 04:29 PM -----

**"Tony Louey"**  
**<tonylouey2001@juno.com>**

Tobill.wycko@sfgov.org  
ccsfoceanedge@earthlink.net  
Subject: Save Golden Gate Park

12/12/2011 04:20 PM

Dear Mr. Wycko,

It has come to my concern that the parkland in the western edge of Golden Gate Park will be destroyed to renovate Beach Chalet Athletic Fields. It is not necessary to destroy the green grass and upgrade the field to become the so-called high standard. The additional stadium lights and parking will only make the surrounding neighborhood worse. On the other hand, the environment of the field should be integrated with the park, which is what it is right now. We depend on the plants and trees in order to breathe, do you want our future generation to suffer? It's our park, please do not destroy it.

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Regards,

Man Kwong Louey  
1076 Plymouth Ave  
San Francisco, CA 94112

---

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jill Lounsbury  
<jillprod@yahoo.com>

12/06/2011 05:58 PM

Please respond to  
jill Lounsbury  
<jillprod@yahoo.com>

To "bill.wycko@sfgov.org" <bill.wycko@sfgov.org>,  
"don.lewis@sfgov.org" <don.lewis@sfgov.org>  
cc "c\_olague@yahoo.com" <c\_olague@yahoo.com>,  
"rm@well.com" <rm@well.com>, "wordweaver21@aol.com"  
<wordweaver21@aol.com>, "plangsf@gmail.com"

bcc

Subject Fw: Seeking Planning Commission Contact Info - Beach  
Chalet

To Whom it may concern:

I would like to submit 2 letters of support for the Beach Chalet Renovation Project.

My Name is Jill Lounsbury I am the GM for The San Francisco Nighthawks and a Vikings Youth Coach for the last 25 years.

I would have loved to have been there tonight, but due to the lack of lit fields in the evenings, I must commute 1 hour across the Bay Bridge to Practice with my women's team on a lit, safely turfed field in Berkeley.

When I started coaching Youth Soccer 25 years ago, we were allotted Two 1 and ½ practices for my youth teams. The sport of soccer was just getting its start. Since then it has exponentially grown, to the point where now my youth teams only get One 1 hour slot, shared with 4 other teams. WE are shuffled from one type of field to another for games- sometimes with big goals sometimes with small goals- it is ridiculous- and often leaves our San Francisco kids lacking where other counties teams thrive. (And why many families with talented athletic children leave the city)

An easy example would be to look at team rankings for youth teams in Northern California- out of 400 teams only 1 was from San Francisco, and only because that coach, whom I know, found extra field time on the side for his team.

We need more fields.

We have ask for there to be added fields to the inventory, whether by converting an underused Golf Course, or locating Public land that could be converted.

This has not happened.

So if were not going to find new space to make into fields then this is the best possible alternative- to add more playing time to existing fields by turfing them and lighting them.

If anyone has seen the affect that turfing and lighting has had on Silver Terrace, Mission, and Crocker Amazon, you would think this is a no- brainer. All of theses sites have become safer both in preventing awful sprains and breaks from gopher holes and overuse, but from eliminating the undesirable riffraff that used to inhabit the parks; Light, cleanliness and happy families seems to scare away the drug dealers and sexual predators.

I implore you, no I beg you to please make this project a top priority so that the kids and adult players from San Francisco have a safe place to play.

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cont.

AND:

This is my letter from the Planing Commisions Meeting.

My name is Jill Lounsbury, I am the Manager of the San Francisco Nighthawks Women's Premiere Soccer team, and a youth coach going on for more than 25 years.

I was at an Old timers Hall of fame Dinner Sunday Night, and they all spoke up about this meeting- Talking about how they have such fond memories of the Beach Chalet, but that no one ever imagined the sport would grow so large that we cannot accommodate all the teams, their practice and games. As of this moment we are running soccer at 400% (compared to golf at 40%) We are seriously underserved in fields, and according to the national standards we should have 148 fields to serve our citizens. We have approximately 34. Teams are only allotted 1 hour of practice per week. And for youth teams this mean  $\frac{1}{4}$  of a field, in which they must split a goal. How do you split a goal?

04

Renovating this field would not only give us one extra field (one is always closed for reseeding) but 2 extra seasons, not to mention evening available with lights to benefit adults who need recreation as much if not more than children do.

The Architects of Golden Gate Park intended its use to be as much for Recreation as for Parks. It's name it says it all: San Francisco Rec and Parks. Even then they recognized which such a compact city on a small parcel of land that it would be important for it's citizens to have a place for recreation. So they took the "Outside Lands" comprised of mostly sand dunes and gnarly trees and made our Park.

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However, gophers found it too. And our field as it is, is a dangerous landmine for athletes. My team in particular has several girls who play on National Teams, play Professionally overseas, and high schooler's preparing themselves for a college career complete with a full ride scholarship. I cannot in good conscience have them play on a field where people regularly break ankles and legs in gopher holes.

06

So we travel 1 hour there and 1 hour back to play an hour and  $\frac{1}{2}$  on a safe field in Berkeley.

Right now the trend I see happening on my team, is an exodus to Europe to play, where they have great facilities and treat their players and athletes with respect.

You say who cares if we lose a few soccer players. But they are more than that.

90% of my player's coach. 75% work for a living with children or at risk groups. 100% of them volunteer for civic duties. 2 players work with mentally and physically challenged, 1 works with



Autistic children, 2 just returned from the Peace Corps, 2 want to go as soon as they are done with school. They are upstanding citizens.

Every time one of these talented players leaves, 5 youth teams are without their coach. 100 young lives are affected. Ask any parent with a girl soccer player how hard it is to find a female coach and role model. We need to keep our players and coaches here.

We are not asking for more. We are asking to take the existing Beach Chalet footprint and make it better. Safer. Make it able to accommodate more hours and players.

If this Commission is concerned with landmarking the existing cinderblock restroom facilities, so run down that even grown men are afraid to change in them, and that are not even germane to the original plans, then I have to ask you, which do you value more: Our valuable Citizens or a run down cinderblock outhouse?

I urge the Committee to come to our game on Saturday at 1pm at the newly renovated Crocker Amazon Fields and see these wonderful athletes in full glory and see what turfing the fields at Crocker has done to make that area safer and more family friendly. Recreation at it's finest.

Thank you for your time.

Jill

**From:** Anmarie Mabbutt [<mailto:tenniselement@yahoo.com>]  
**Sent:** Monday, December 12, 2011 12:00 AM  
**To:** [bill.wycko@sfgov.org](mailto:bill.wycko@sfgov.org)  
**Cc:** [don.lewis@sfgov.org](mailto:don.lewis@sfgov.org); [linda.avery@sfgov.org](mailto:linda.avery@sfgov.org); [sfoceanedge@earthlink.net](mailto:sfoceanedge@earthlink.net); [eric.l.mar@sfgov.org](mailto:eric.l.mar@sfgov.org)  
**Subject:** BEACH CHALET ATHLETIC FIELD RENOVATION - DRAFT ENVIRONMENTAL IMPACT REPORT

Dear Mr. Wycko,

I am writing today in opposition to the planned artificial turf soccer complex at the Beach Chalet soccer fields. The pastoral western end of Golden Gate Park is not an appropriate location for seven acres of artificial turf or 60 foot high stadium night lighting. I find the current EIR to be deeply flawed and the proposed project to be a direct violation of the Golden Gate Park Master Plan. I support the alternative proposal put forth by the public at the December 1st Planning Commission hearing. **You have received extensive testimony, both oral and written, documenting the significant adverse impacts to the people and wildlife that live and visit the area if this project is approved.**

**No less significant is the deceptive manner in which this project has been advanced by the Recreation and Parks Department.** The proposed gift of the conversion of the Beach Chalet fields to artificial turf from the City Fields Foundation has never been approved by the Recreation and Park Commission or the Board of Supervisors. I sent a letter to the Board of Supervisors back in January 2010 reminding them of their obligations under Administrative Code Section 10.100-305(b) to approve all gifts in excess of \$10,000 including the proposed artificial turf soccer complex at Beach Chalet. Within hours, Fisher Family lobbyists, Susan Hirsch and Alex Clemens, began a flurry of lobbying activity including multiple contacts with General Manager Phil Ginsburg, Board President David Chiu and Supervisor Eric Mar. Just days later, Supervisor Mar introduced Resolution #100053 to approve the City Fields Foundation gifts at Beach Chalet and Mission Playground. But this legislation was never calendared to Committee and simply expired.



Since its inception, the Recreation and Parks Department, the Recreation and Parks Commission, the City Fields Foundation and the Board of Supervisors have conspired together to deny the public the information, notice and opportunity to comment to which they are clearly entitled under the law. The RPD has never supplied the Controller, the Clerk or the Board with the annual and quarterly reports required under Ordinance #060255 and Administrative Code Section 10.100-305(a). The RPD has also refused to report the City Fields Foundation gifts on its website as required by Sunshine Ordinance Section 67.29-6.

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If you have not already done so, please consider reading "The Making of Golden Gate Park: The Early Years" and "The Making of Golden Gate Park: The Growing Years" by long time San Francisco resident and Golden Gate Park historian Raymond Clary. Had Michael de Young succeeded in holding the 1915 Panama Pacific International Exposition in the Park's western end, you would likely not be considering the current Beach Chalet soccer field complex project because the entire area would already have been covered with pavement and buildings. 100 years later, I am hoping that those with the power to preserve and protect Golden Gate Park take a lesson from history.

October 14<sup>th</sup>, 2011 marked the 100<sup>th</sup> Anniversary of the groundbreaking ceremony for the 1915 Panama Pacific International Exposition. President William Howard Taft tossed the first shovel of dirt at the Golden Gate Park Polo Fields with Exposition Director Michael H. de Young at his side. The Exposition was to be located on 562 acres in the western half of the Park. The plans included the construction of a breakwater, two giant amusement piers extending into the Ocean on either side of the Park, a museum, an art gallery, a modern aquarium, a new observatory on Strawberry Hill, a light tower, an open air auditorium and dozens of pavilions, towers and other "architectural features." The middle and western ends of the Park would have contained more pavement and structures than wooded, natural areas. Fortunately, due to some very influential and vocal opposition to the use of Golden Gate Park as the Exposition's location, the 1915 Panama Pacific International Exposition was eventually moved to the Cow Hollow area in the Marina District.

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It is not at all clear when or how the conservationists were able to secure what was arguably the single most significant victory in the quest to preserve and protect Golden Gate Park. They were able to overcome a presidential groundbreaking and some of the wealthiest and most powerful individuals in San



Francisco. Park Superintendent John McLaren, former Superintendent William Hammond Hall and Park Commissioner W.W. Stow led the movement to relocate the Panama Pacific Exposition. They insisted Golden Gate Park was not an appropriate location for mass commercial events. All three had witnessed firsthand the ravages left by the first World's Fair held in Golden Gate Park, the 1894 California Midwinter International Exposition.

On August 25<sup>th</sup>, 1893, the Midwinter Fair's Director, Michael H. de Young, with silver shovel in hand, broke ground at what is now the Music Concourse. Just a few months later, Concert Valley, as it was formerly known, filled with trees and recently planted flora, had been cleared and excavated to make room for what at that time included the biggest structure ever built in California. The Manufacture and Liberal Arts Building covered nearly three square acres. It was just one of five major structures surrounding the Grand Court of Honor, the heart of the Midwinter Exposition. In less than six months, more than 180 structures were built in the Park in preparation for the Fair which officially opened on January 27, 1894. Fair organizers originally told the public the Fair site would be five acres, it quickly grew to encompass more than 160 acres in the heart of Golden Gate Park. **As Superintendent McLaren predicted, this mass commercial use of Golden Gate Park set a dangerous precedent for the future.** The legacy of the 1894 Fair remains the driving force behind the current privatization of San Francisco's public park space. When the Fair closed in July 1894, the Fine Arts Building became the first public art museum in San Francisco. In its first year of operation, a half million people passed through the Museum doors. The Memorial Museum soon became too small for its growing collection so on April 15, 1917, on a greatly expanded site, construction began on a new museum. The new de Young Museum opened in 1921.

More than 100 years and 135 million dollars in renovations later, the Museum and the Japanese Tea Garden, the only architectural structure from the 1894 Fair that still remains in Golden Gate Park, are largely responsible for the transformation of Golden Gate Park from a woodland retreat to a carefully marketed tourist attraction. Every two months, representatives from the Recreation and Parks Department, the de Young Museum and the San Francisco Convention and Visitors Bureau meet in closed door sessions to discuss marketing strategies for Golden Gate Park. Not surprisingly, in 2011, a visit to Golden Gate Park feels much more like a trip to Disneyland than the respite from urban

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cont.



stresses it was originally intended to be. The Golden Gate Park Cultural Collaborative and today's Music Concourse are the culmination of everything John McLaren feared for his beloved Golden Gate Park.

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cont.

**Two huge construction projects are currently planned for the western end of Golden Gate Park**, the artificial turf soccer complex at Beach Chalet and the Recycled Water Treatment Facility. **Please support moving these projects to locations outside of Golden Gate Park.** If you have any doubts, take a look at the plans for the 1915 Panama Pacific International Exposition in Golden Gate Park on pg. 36 of *The Making of Golden Gate Park, The Growing Years: 1906-1950* by Raymond H. Clary. The aerial image is a powerful and sobering reminder of how important your decisions are in protecting not only Golden Gate Park but all of San Francisco's public park space.

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In a sixteen page argument against holding the Panama Pacific Exposition in Golden Gate Park, William Hammond Hall, the Park's original Superintendent, wrote "Keep the buildings out. Make parks of our 'parks,' and keep them as such." Golden Gate Park historian, Raymond H. Clary, once wrote, "*You cannot add to a park without subtracting far more than you have added.*" **Golden Gate Park does not need seven acres of synthetic turf or 40,000 square feet of new buildings. On the contrary, Golden Gate Park needs some well-deserved peace and quiet.**

Thank you for your time.

Sincerely,  
Anmarie Mabbutt



Bill Wycko/CTYPLN/SFGOV  
12/08/2011 05:41 PM

To Don Lewis/CTYPLN/SFGOV@SFGOV, Sarah B  
Jones/CTYPLN/SFGOV@SFGOV  
cc  
bcc

Subject Fw: Soccer players want natural grass

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 12/08/2011 05:41 PM -----



"Kathleen McCowin "  
<kmccowin@berkeley.edu>  
12/08/2011 05:35 PM

To <bill.wycko@sfgov.org>  
cc "'Liz Dal Bon'" <carrett2@gmail.com>,  
<sfoceanedge@earthlink.net>  
Subject Soccer players want natural grass

Kathleen McCowin and Elizabeth Dal Bon  
2448 Great Highway #15  
San Francisco, CA 94116  
650-862-4703  
December 8, 2011

Mr. Bill Wycko  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission St. Room 400  
San Francisco, CA 94103

Subject: BEACH CHALET ATHLETIC FIELDS RENOVATION  
Draft Environmental Impact Report  
Planning Department Case No. 2010.0016E  
State Clearinghouse No. 2011022005

Dear Mr. Wycko:

My daughter Liz and I oppose the proposal to artificial turf and stadium lights in the Beach Chalet Athletic Fields. This happened to our fields in Palo Alto, and the results made all the soccer players on my daughter's teams, and many of her friends on other teams in the AYSO Fall leagues and Spring Select, miserable. They actually preferred playing on natural fields even in the rain, because soccer

players are a hardy bunch, and they love playing in the mud. See the attached picture-I have others of the entire team mudded up and smiling

We live near the Beach Chalet fields, and I bike past them on the way to the Safeway for our groceries. In my experience, the current paths work just fine for passage by bike from one windmill to the other, even in rainy weather.

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We support the Compromise Alternative put forth by the public during the Planning Commission hearing of December 1<sup>st</sup>, 2011. My daughter and her friends were miserable playing soccer in Palo Alto when they changed the fields to artificial turf. Besides constant skin abrasions and poor footing, there were many more accidents, and the girls just hurt more after playing on them. My daughter had a mini-concussion.

02

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Also, we am fearful for the fragile shore and other wildlife if floodlights are used. We love our little snowy plovers, and they are barely hanging on as it is. Having lived for 10 years in Palo Alto without easy access to the beach, we would hate to see this unique natural gift compromised. Liz runs barefoot on the beach, such as this morning, and I walk it most mornings. Please don't take an action that could hurt it.

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Liz and I request that the Planning Department focus on the compromise alternative and work to find a solution that protects Golden Gate Park's parkland and doesn't hurt the shore.

06

Thank you for considering Liz and my concerns. We would also like to receive a printed copy of the Comments and Responses and the Final EIR by mail

Please let me know that you have received this letter.

Thank you,

Liz Dal Bon  
Kathleen McCowin

Liz Dal Bon 16-Explainer at the Exploratorium, and City College student

Kathleen McCowin, MS JD

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IPIRA/Office of Technology Licensing  
University of California, Berkeley  
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Berkeley, CA 94704  
[kmccowin@berkeley.edu](mailto:kmccowin@berkeley.edu)  
510-642-8355



DSC\_7143.jpg



To: <bill.wycko@sfgov.org>  
Cc: <sfoceanedge@earthlink>; <net>  
Sent: Saturday, January 01, 2011 6:27 AM  
Subject: D.E.I.R and opposition to thw beach chalet plastic fields project

Hello,

My name is Terry McDevitt and I am writing you in opposition to the Beach Chalet plastic turf project and with a few questions about significant data left out of the D.E.I.R.

First is the loss of oxygen produced by natural grass. Every six square feet of grass produces enough oxygen for a person for a day. the proposed project would eliminate the equivalent of oxygen for some 40,000 people. Why is this not mentioned? Air quality would certainly be considered an environmental concern. No data was included on this issue

01

Second Air Temperature- studies have shown that natural grass has an air cooling effect of 3-7 degrees, while synthetic(plastic) turf can heat the air above it by 10-35 degrees depending on the weather. This much heating of the air would certainly affect the flora nearby and affect the athletes playing on it adversely. There was no data on this issue in the D.E.I.R.

Third bird feeding- As a gardener/groundskeeper on athletic fields for thirty -five years I've witnessed the daily use of natural grass fields as feeding stations for a broad variety of birds. Not only do they consume grass and weeds , they also feast on the various bugs and worms. Many of the birds are of a migratory type and rely on such sites as the Beach Chalet fields for a feeding stop. Once again there was no reference to this in the report.

02

fourth- loss of water re-charge of the subterreanean aquifer by both rain and irrigation. Millions of gallons of water that normally percolates into the aquifer beneath the fields would be blocked from getting there by this project. The section of the report that covers water quality makes no mention of this. The water used in irrigation and that which arrives by precipitation produce the field to play on, oxygen and re-charging of the aquifer. All these positive environmental effects would be negated by this project. This was not covered in the report.

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Fifth- The lack of multi-use- currently the natural grass fields can be used for a variety of events while soccer is the only activity being planned for. If built there should also be designation of fields for softball football etc. , along with time slots for same.

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Sixth- Maintenance costs- There was no data describing the current costs of maintenance versus the cost of the plastic turf. I worked for Saint Ignatius High School during their construction of plastic turf fields and their subsequent replacement eight years later. The replacement cost for 1 soccer/football sized field was \$430,000 after 8 years and \$100,000 for replacement/clearing of the drainage system in the ninth year. If the Beach Chalet fields are the size of four soccer pitches then the cost extrapolates to approx. \$2,000,000 for 8 years not including the c.c.s.f. cost of initial installation. Compared to labor (1 gardener @\$70,000 a yr. x 8 = \$560,000 + materials \$80,000 = \$640,000) I don't see how this project saves in maintenance costs.

05

Seventh- The lights- This is extremely incongruous to the historical and aesthetic fabric of Golden Gate Park. It would create a use factor at night that will certainly bring the typical urban problems that the Park is supposed to be a respite from. The Park is a naturalised horticultural jewel that was intended to be a sanctum from the urban hardscape. Coating six acres of Golden Gate Park with plastic would be a travesty historically and horticulturally. It would certainly go against our best efforts to be seen as The Greenest City.

06

While brought up these issues at a meeting about what was to be quantified in the D.E.I.R. they were glaringly omitted. Please consider them.

Thank You, Terry McDevitt

*dismasmcd@yahoo.com* COM-564

12/5/2011

**WE THE UNDERSIGNED ARE OPPOSED TO THE BEACH CHALET FIELD RENOVATION WITH ARTIFICIAL/TIRE CRUMB, STADIUM LIGHTS and REMOVAL OF 40 to 50 TREES.**

**WE SUPPORT THE RENOVATION OF THE BEACH CHALET WITH ENVIRONMENTALLY FRIENDLY NATURAL GRASS, BETTER IRRIGATION and GOPHER CONTROLS.**

**Project alternatives:** Why was **Kezar Stadium** not researched? The stadium already has night lightening, stadium seats, parking, mass transit and toilets.

**Candlestick Park** The 49ers will be gone by 2013 the area has parking, stadium lights and has massive spaces to expand. Why no plans for Candlestick Park as a Soccer Complex.

**Boxer stadium** all of the above reasons.

**Wt. Sunset** has 4 soccer pitches, excellent parking (has a lot, schools have lots plus parking on east & west streets of Sunset Blvd.) 3 bus lines are only a block away, new playground and toilets. There is also field space on 41<sup>st</sup> Ave to build another pitch (or 2) and design for a multi-use field (like So. Sunset Plg. 6 blocks away).

**Larsen Park** good Muni transportation, good parking, new playground and new toilets

**Community playgrounds.** If this project is about "kids" why not put one in every supervisorial district?

01

**There are over 60 fields to play soccer but only 1 Golden Gate Park and the wooded and natural area.**

Ask yourselves why has the SFRPD put a fence around the Beach Chalet and almost stopped all maintance on the fields? As a 20 year supervisor with the SFRPD I supervised Wt. Sunset. Maintance on soccer fields does not require a lot of work. A mower mows maybe every 2 weeks, a line painter once a season, watering the fields is done by automatic sprinklers only depending on the need (6 months of the year watering is really not needed that much). At the end of the season maybe some grass seeding if needed.

02

What maintance cost is the SFRPD saving at the expensive of our environment?

Who is going to pick up the litter left all over the park after soccer games?

After \$1.3 million to renovate the Polo Fields they are locked and only opened if paid for. This will happen at the Beach Chalet fields.

No amount of language can change the fact that tire crumb is poison. Chicago & New York have banned these types of plastic/tire crumb fields. Has the DEIR investigated why?

Plastic/tire crumb can NEVER be recycled. It will be blight forever and ever.

Has the DEIR investigated the injuries on artificial turf?

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**TRAFFIC:** In a perfect world your traffic assumptions might work but you have not taken into account that the Gt. Highway is heavily used as a commute path from Highway 1, the Sunset area to the Richmond district and to the Golden Gate bridge. When the Gt. Highway is closed the surrounding neighborhood are used to get to Golden Gate Park.

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In a Transit 1<sup>st</sup> City no public transportation to this project is not in keeping the intent of the policy.

08

Traffic in the park would triple. Going around and around looking for a parking spot. In Table 11-4 weekly playing schedule presumes that after 1 game the players and fans would leave to let others play and watch, not going to happen, players and spectators will stay, leading to more traffic searching for a

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place which will spill out to the surrounding communities and take home owners parking. I wonder how far up the park drivers will go?

Remember all of the cars driving around will spew out emissions from the cars and pollute the environment.

**PARKING:** 174 spaces near the soccer fields for players to park. What about the "other people", the archers, golfers, tulips garden and windmill viewers and nature lovers? Where do they park? As the overflow goes out into the neighborhoods people "cut" their own short cut path to the fields, not caring about what they trample on.

As we have seen at many functions in the park people will park wherever they wish even on grass.

**BIRDS:** Many experts will be writing but I want to state a few observations. Quoting from the DEIR document "The Beach Chalet Athletic fields are located within an Urban Bird Refuge" and "artificial nighttime lighting" and "can be especially problematic for migrating songbirds".

I can state that at So. Sunset playground there are NO more birds. Canadian Geese used to land there on their journeys, as they still do at the natural fields at the Beach Chalet.

As I walk every day in the park I have noticed that birds define their own space, "birds of a feather" and want to stay in their fields and do not migrate to other places.

**TREES:** Years of observation have taught me that the SFRPD does not take care of their trees.

Trees in the City are difficult to grow. It took John McLaren and William Hammond Hall over 25 years to plant the "outlands" trees that protect the rest of the park from sand, salt and wind. Taking down any tree and replanting with stick figure trees or trees that are only a foot tall will not protect the fragile environment that is the park. DEIR words "implementation of the proposed project may adversely affect protected trees" and "ground-disturbing activities may injure roots".

In speaking to an arborist he states that any shrub that is 10' tall is a tree (myoporum). Who determines what should come down? Is it the private tree removal contractors?

**IN CLOSING:** Quoting from the DEIR "The No Project Alternative would be the environmentally superior alternative", "Selection of the Off-Site Alternative would avoid significant unavoidable historic resources impacts to the character defining features of the Beach Chalet Athletic Fields cultural landscape" "potential conflicts with existing plans and policies, particularly the Golden Gate Master Plan; and potential loss of historic resources or substantial changes to the character of historic resources."

We the undersigned feel that a lot of the figures, assumptions, are skewed to support what the SFRPD wants. Renovation of the Beach Chalet to keep it natural meets all of the "objectives" of the project and is in keeping with the Master Plan.

PLEASE remember that the Planning Commission duties are to protect the entire environment for its people and wildlife not just soccer players.

St. Francis, who the City is named after, was maybe the world's first environmentalist, would beg you please be the true "stewards of our environment".

I am requesting a printed copy of the comments and responses and the final EIR.

Thank You,  
Shawna McGrew  
1522-32n Ave

San Francisco, Ca. 94122

Lynne Whiteside, 2024 Broderick, S. F. Ca., 94115 # A

Brianna Calabrese & Jonathon Hanson-Weaver, 4443 Irving St., S. F. Ca., 94122

Angela Maestri & Steve Kamena, 1423 Plymonth, S. F. Ca., 94112

Janida Matejcik & Carli Fullerton, 2690-45<sup>th</sup> Ave, S. F. Ca., 94116



Nov. 16, 2011

Christina Olague, President  
Planning Commission  
1650 Mission St. Suite 400  
San Francisco, Ca., 94103

**Re: Request for a 90 day extension of the public comment period  
Beach Chalet Athletic Fields Draft Environmental Impact Report  
Planning Department Case #2010.0016E  
State Clearing house #2011022005**

President Olague, Commissioners

I am requesting an extension from the Planning Department regarding the public comment period for the Beach Chalet Athletic Fields Draft Environmental Impact Report (DEIR) for 90 days.

I am discovering that the 360 pages is taking a lot of time to read, understand and digest.

This is a very important document and I need more time, and I am sure I am not alone, to process all of the information.

01

Thank You

Shawna McGrew  
1522-32n Ave  
San Francisco, Ca. 94122

**From:** pattibay@aol.com  
**To:** sfoceanedge@earthlink.net, bill.wycko@sfgov.org, don.lewis@sfgov.org

---

**Date:** Friday, December 09, 2011 12:03PM  
**Subject:** Beach Chalet Soccer Fields - DEIR comment letter

---

dear sir, please prevent these proposed lights from ruining the beauty of our golden gate park!. the daylight savings provides much evening use of these fields. new surface;yes. lights;no! thank you, roger meidinger 838 47th ave san francisco. ca 01

December 9<sup>th</sup>, 2011

Mr. Bill Wycko  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission St. Room 400  
San Francisco, CA 94103

Re: CULTURAL AND AESTHETIC RESOURCES  
Public Comment on the Draft Environmental Impact Report  
Beach Chalet Athletic Fields Renovation  
Planning Department Case No. 2010.0016E  
State Clearinghouse No. 2011044005

Dear Mr. Wycko,

I agree with the DEIR's conclusion that this project would cause a substantial adverse impact of a historic resource that would be "**Significant and Unavoidable**".

However, I believe that the Draft contains a number of errors and deficiencies that need to be corrected. In this note, I will concentrate on issues related to Cultural Resources (historic integrity). By their very nature, some of these issues also affect the Aesthetic Resources of the area:

- The Draft treats project adverse impacts as if they are limited an isolated site. In doing so, it tends to ignore the damage done to one's entire experience of the western end of Golden Gate Park. This is likely to leave policy makers with the mistaken impression that the adverse impact on the Historical and Aesthetic Resources are small technical matters.
- Some of the Draft's observations about the project's impact of visual resources of the Park and its surroundings are in error or incomplete.

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**My requests for corrections and amplifications to the DEIR are stated in BOLD.**

### **My Experience of the West End of Golden Gate Park:**

I've been visiting Golden Gate Park since I was a child in the 1950's. From the beginning, I clearly perceived the Park to be a very different, unique experience. Unlike most urban and suburban parks, Golden Gate Park offers more than a small patch of green, a grove of trees, a few picnic tables, and a collection of ball fields. It is a seemingly unending opportunity for unstructured wandering, exploration, and contemplation -- a place to watch a Great Blue Heron hunting one moment and, a bit later, a ball game played on a wide meadow in the midst of a forest. Particularly in the west end of the Park, one can pursue such activities without the fear of turning a corner and finding a busy street or a parking lot. From its beginning, the Park has been a place that allows people to live in a big city and to forget that very fact.

The west end of the Park is filled with a network of small, often informal footpaths which wander through the forests from meadow, to ball field, to lake, and to playground. All elements work together to provide a gentle encounter between humans and the natural world.

There are a number of historical sites located near the Beach Chalet Fields, including the Beach Chalet, the Dutch Windmill, and the newly-renovated Murphy Windmill. For an ordinary person like myself, the pleasure of such sites is greatly dependent on their surroundings in a large naturalistic landscape. To enjoy the Murphy Windmill, I don't stand at the foot of the building. I encounter the windmill when I visit the fields to watch the kids playing or to observe the herons and hawks that frequent the area. I enjoy viewing the mill across the open meadow, towering over the forest canopy. The windmill contributes to my enjoyment of the Park. In turn, the surrounding meadows and forest give the windmill much of its beauty and significance. (See Photo 1)

Finally, the west end of the Park is strongly linked to the adjacent beach area. A walk through the Park often ends on the Ocean Beach Promenade -- from there, one can contemplate the shoreline or look back at the great park with its towering windmills. On fine, golden evenings, hundreds of people will gather to watch the setting sun.

### **The Historic Resource:**

The DEIR states, "*The history and significance of Golden Gate Park are provided in the National Register of Historic Places Registration Form*" (Page IV.C-10) "*Golden Gate Park is listed on the NRHP ... as one of the pioneering examples of a large urban park in the United States and as the first naturalistic park in the west.*" (Page IV.C-12)

The National Register refers to many of the characteristics I personally experience and value on a daily basis:

*"As a work of landscape architecture, Golden Gate Park is a masterpiece on several levels. ... The delight of having nature in the city (even if that nature is artificially created) is true today as ever. The pastoral landscape is perfectly suited with meadows*

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*for picnics, ball games and other group activities: forests for trails and the feeling of wilderness... ” (NRHP, Sec 8, page 42)*

*“Golden Gate Park was also important for it’s role in advancing the art of park design ... With Golden Gate Park, we see a transition to evolving forms of active recreation. Ball fields, courts, and playgrounds were considered ‘urban’ intrusions that would conflict with the experience of nature that Olmsted strove to provide. In contrast, these features were skillfully added to Golden Gate Park in a way that preserved the naturalistic features of the landscape.... Hall’s original plan reserved the western end of the park as a natural woodland, and allowed for more park and recreation development in the eastern portion of the park” (NRHP, Sec 8, page 41)*

*“It is important, for this nomination, to view Golden Gate Park as a whole designed landscape. Although it contains many separate elements and features that were developed over time, it was conceived, planned, and viewed as a single creation ... Golden Gate Park was created by the vision of William Hammond Hall and his protégé John McLaren” (NRHP, Sec 8, page 39)*

*“William Hammond Hall wrote extensively about his design intent for Golden Gate Park ... ‘A park therefore, though containing within itself the appurtenances necessary for the comfort and pleasure of great masses of people, as a whole, should be an agglomeration of hill and dale, meadow, lawn, wood and coppice presenting a series of sylvan and pastoral views calculated to banish all thought of urban objects and lead the imagination to picture space beyond as a continued succession of rural scenes and incidences’ ” (Sec 8, page 43)*

#### **DEIR Analysis of Visual Impacts:**

The Project’s impact on the visual experience of the Park and its surroundings are both Aesthetic and Historic Resource issues. The material quoted above clearly demonstrates that what the visitor sees is very important to the design intent of the Park. The landscape design intent has survived and is the major historic resource of the Park.

Section IV-B of the DEIR contains a number of visual simulations intended to help the reader form an impression of the visual impact of the project. A significant amount of information is missing or wrong.

Figure IV.B-3 illustrates a direct view of the fields with the 60’ night lighting poles. In the simulation, the poles appear to be positioned between each of the fields. This is inconsistent with the Project Description which states, *“There would be two light standards each at the north and south ends of the facility ... The other six light standards would be located between the centermost fields ...”* (Page II-15) **The Figure should be corrected in the Final EIR.**

Section VI proposes Alternative 3, which would include reduced night lighting. *“... the SFRPD would install six new field lights instead of ten, which would provide lighting for*

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*the two center fields.”* (Page VI-10) It’s hard to visualize that such a change could allow this alternative to be judged to have impacts “less than significant”. **The Final EIR should illustrate this option in a manner similar to Figure IV.B-3.**

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The DEIR concludes, “*The athletic field lighting would add new vertical elements to the project site, which would constitute a change to its overall character. However, this would not be expected to degrade the visual character of the site because the light standards would not be so intrusive as to preclude the enjoyment of the natural features of the facility*” (Page IV.B-28) Beauty is often subjective, but I personally believe that the lighting towers are among the worst visual aspects of the project. The juxtaposition of the towers and the park is quite jarring – something like looking at a landscape filled with pine trees and cactus – they just don’t mix. The transformation of the pastoral fields goes beyond “urban” to something resembling to a scene out of “War of the Worlds”.

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Several simulated views have locations and orientations which minimize the reader’s impression of visual impacts. The scene in Figure IV.B-4 shows a view northward along the old railway grade trail which links the Murphy Windmill area to the Beach Chalet and Dutch Windmill. While none of the project features can be seen from this exact viewpoint, the fields can easily be seen from several other places on the same trail a bit further to the north (Photos 2, 3, and 4). **The Final EIR should simulate some of these viewpoints if it wishes to fairly convey the impacts of the project.**

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A similar situation exists for Figure IV.B-5. This simulation illustrates a view northward along the Ocean Beach Promenade. The orientation is such that the closest project light towers are out of view to the right of the photo. The towers which can be seen are probably 1,100 feet to 1,500 feet from the viewpoint, greatly diminishing the apparent height of the project lights. A more relevant viewpoint would be further north along the Promenade, closer to the center of the park. The view should face generally eastward. From such a position, the nearest light towers would be about 500 feet away. **The Final EIR needs to illustrate such a view to properly convey the impact the project towers on the Ocean Beach Promenade, the neighboring GGNRA beach areas and the 49-Mile Drive.**

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**Of greatest importance would be to include a sunset or evening version of the same scene showing the effect of the night lighting in the Final EIR.**

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The DEIR states that “Although only scenic vistas need be considered under CEQA, views from other nearby public vantage points are also discussed and depicted herein, for informational purposes” (Page IV.B-19) The DEIR includes both day and night simulations of the view from Sutro Heights. **Curiously, the DEIR does not even mention a much more famous viewpoint – southward along the beach from the Cliff House area. Such a view, especially at sundown, should be discussed and simulated in the Final EIR.** It is one of the iconic viewpoints of the City. It is also experienced by many more people.

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### Tunnel Vision in the DEIR:

Section IV.C “Cultural Resources” of the Draft tends to circumscribe the area affected by the project to a fairly small footprint: *“The CEQA-Area of Potential Effects (C-APE) includes all areas of potential ground disturbing activity and associated staging areas and is used to define the horizontal extent of potential impacts”* and yet it immediately follows with a definition taken from federal standards, *“The APE is the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of the historical resources”* (Page IV.C-2)

The Draft concludes, *“After completion of the project, the Beach Chalet Athletic Fields would no longer be a contributor to Golden Gate National Historic District.”*, but, *“Considering there are 137 contributing resources to the District, the potential loss of one contributor or about 0.7% of the total would not constitute a significant impact to the District as a historical resource.”* (Page IV.C-28)

Finally, despite the PUC’s plan to build a 2 - acre recycled water treatment plant just to the south of the fields, the Draft concludes the cumulative effects, *“would not substantially alter the historical resources because the changes brought about by these projects would largely be independent of one another; that is, observers of one would not simultaneously be able to see or experience another (due to existing or proposed vegetation)”* (Page IV.C-2)

My personal impression: the Draft is literally missing the forest for the trees. At a minimum, the Final EIR needs to address the following questions:

- **How can building a semi-professional modernistic sports facility with lighting towers twice the height of the surrounding forest be reconciled with the notion that the major historical resource of the Park is its pioneering landscape design characteristics which emphasize the naturalistic setting of the west end and the skillful setting of playfields in a pastoral setting?**
- **Taken together, the Beach Chalet Project and the adjacent PUC Recycled Water Treatment Plant will stretch across about ½ of the width of the Park. Why won’t the combination of these two projects greatly exacerbate the destruction of the landscape design of the western end of the Park?**
- **Many of the 137 contributing elements to the National Register Nomination are items such as statues, restrooms, and utility buildings (NRHP, Sec 7, pages 3-5). Only a limited number of contributing elements are of the nature or scale to have a major impact on the remaining historic design character of the Park. The Beach Chalet meadow is over 7 acres and with its surrounding grass and forest, covers over 11 acres. The Final EIR should identify the remaining areas that contain contiguous forest, meadow, and lake of a scale comparable to the Beach Chalet site. By “contiguous”, I mean areas not divided by roadways, utility lots, parking lots, or buildings. “Comparable scale” means at least 75%**

the size of the Beach Chalet site – about 8 acres. How many are located in the western part of Golden Gate Park? How many are open to general visitors? (The golf course is restricted to golfers, the Arboretum is restricted to limited daylight hours to City residents and those able to pay a fee)

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- An integral part of the design concept of the Park is to *“lead the imagination to picture space beyond as a continued succession of rural scenes and incidences”*. The Final EIR needs to explain how viewing individual historic sites as isolated locales at which *“observers of one would not simultaneously be able to see or experience another (due to existing or proposed vegetation)”* can be squared with the historic Park design.

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Greg Miller  
1243 42<sup>nd</sup> Avenue  
San Francisco, CA 94122





Photo1:

Beach Chalet Athletic Fields today – nature, history, and recreation in a beautiful, naturalistic setting.

This is Golden Gate Park as envisioned by its founders, as designated in the Golden Gate Park Master Plan and the National Register of Historic Places, and as enjoyed today by residents of all backgrounds – rich and poor, young and old, healthy and infirm.



Photo 2:  
Views over and through the trees from the old railroad path looking south east – the light towers will be clearly visible here, both during the day and at night.

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Photo 3:  
Views under the trees from the old railroad path looking south-east. This vegetation is kept trimmed up by staff from the ground level, for clear views of the path from the fields and back again. The low newly-planted vegetation are native plantings that are unlikely to grow up to screen the fields at ground level.

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Photo 4:

Views under and through the trees from the old railroad path looking east. This vegetation is kept trimmed at the ground level, for clear views into the playing areas. The tops of the trees are wind-pruned and are unlikely to grow much higher.

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December 9<sup>th</sup>, 2011

Mr. Bill Wycko  
 Environmental Review Officer  
 Beach Chalet Fields Renovation  
 San Francisco Planning Department  
 1650 Mission Street, Suite 400  
 San Francisco, CA 94103

**Re: Public Comment on Draft EIR – Aesthetic Impacts**

Beach Chalet Athletic Fields Renovation  
 Planning Department Case No. 2010.0016E  
 State Clearinghouse No. 2011044005

Dear Mr. Wycko,

Section IV.B of the DEIR deals with potential impacts on aesthetics in the project area. **I disagree with two of its findings:**

*“Impact AE-2: The project would not substantially degrade the existing visual character or quality of the site and it’s surroundings.”*

*“Impact AE-3: Development of the proposed project would not create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area...”*

**My requests for corrections and amplifications are stated in BOLD.**

The analysis of lighting impacts is not rigorous, leading to highly subjective judgments not based on substantial objective information.

Although the project would erect ten 60’ high light standards with a total power consumption of 150,000 watts, the DEIR contains no rigorous technical analysis providing quantitative data on the amount of light seen by an observer at some distance. Indeed, when the DEIR introduces limited technical information, it is sometimes obviously incorrect. In describing the 1500 watts sports lighting lamps, page IV.B-33 states, *“The light standards are capped units that emit 134 lumens per lamp...”*. 134 lumens is approximately the amount of light emitted by a 10-watt light bulb. **The final EIR should correct this obvious error.**

01

The bulk of the DEIR’s section on Aesthetics is devoted to a series of computer-adjusted photographic “Visual Simulations” of typical day and evening views. As described on page IV.B-17, *“The evaluation of potential impacts associated with the proposed project includes both a comparison of the ‘before’ and ‘after’ visual conditions, as portrayed in*

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*the simulated images and a qualitative assessment of the degree of visual change that would result in the project”.*

For such an analysis to be credible, three conditions must be met:

**1. The choice of sample viewpoints must be representative of the key visual resources of the surrounding area.**

Omitting well-recognized and important viewpoints or selecting a direction of view that deliberately avoids “seeing” obvious project impacts undermines the credibility of the entire analysis.

As I have pointed out in another comment letter, the DEIR has committed a number of such errors. To summarize:

- The view southeast from the Cliff House area, along the beach is not even mentioned in the DEIR, despite the assertion that the, “... *effects on scenic vistas need to be considered under CEQA*” (page IV.B-19)

The views from the Cliff House are world famous and have helped define the identity of San Francisco in the minds of millions of visitors and residents over the years.

**The final EIR should contain an evening simulation from this viewpoint.**

- The trail along the railway grade is a popular walking path connecting the Murphy Windmill on the south with the Beach Chalet and Dutch Windmill on the north. The DEIR page IV.B-11 states, “*This view is considered scenic for the purpose of this EIR because it is made up of naturalistic features associated with Golden Gate Park and is used by the public for recreational purposes*”. Figure IV.B-4 simulates a view from the southern end of the trail, looking north. In the discussion of the simulation results, the report states, “*None of the elements proposed as part of the project would be visible from this vantage point and the project site would continue to be obscured by the surrounding vegetation*” (page IV.B-21).

This conclusion is true for this particular location on the trail, but it is misleading. There are numerous points along the same trail a bit further north (nearer to the Beach Chalet) where the field can clearly be seen under and through the intervening tree canopy. The view of the fields is an important component of the experience of these segments of the trail. There are several places where the sports light towers will be seen over the trees from the trail. See Photos 1, 2, and 3. **The final EIR should incorporate a simulated viewpoint in this area of the trail.**

- The DEIR presents simulated views from the Ocean Beach Promenade (Figure IV.B-5). In the words of the DEIR, “... *the visual sensitivity of areas along Ocean Beach and the Great Highway is considered high because these views from the public areas are defined by natural features, serve as popular recreational and vista sites, and engender a high expectation of quality views*” (page IV.B-11). In reviewing the

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results of the simulation, the DEIR concludes, *“Owing to the distance to the site from the promenade, during the day the proposed poles and standards would create a level of view disturbance similar to Great Highway street lights. ... As such, the overall views towards the project site from this public vantage point would not substantially change, and this impact would not be significant.”* The DEIR does not even include an evening or night view from the Beach or Promenade. Once again, the problem lies in the choice of viewpoint. The chosen site point is located well to the south of the project, near the intersection of the Great Highway and Lincoln Way. The direction of view seems to be directly north – it is likely that the sports lighting standards closest to this viewpoint are out of view, to the right of the photo. **How far are the light standards seen in this simulation from the view point?** My estimate would be between 1,100 to 1,500 feet.

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A more relevant simulation viewpoint would be further north on the Promenade, close to the center of the west side of the Park. The direction of the view should be eastward, towards the Park. At such a location, the nearest light standards would be 2-3 times closer and their apparent height 2-3 times greater. **The final EIR should include such a simulated view.**

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I know from personal experience that this stretch of the Beach is very popular on clear evenings. Hundreds of people gather at dusk just to enjoy the fine view of the sunset. The view eastward towards the Park and the windmills is an important part of the experience. **The final EIR needs to give people a fair and accurate representation of the impact of the night lighting to this area.**

Photo 4 shows a picture of the night sports lighting at South Sunset Playground, viewed from near the intersection of the Great Highway and Wawona. The viewer’s distance from the lights is approximately 2,400 feet. Notice that the intense blue-white sports lights appear brighter than nearby streetlights. From a viewpoint on the Ocean Beach Promenade, centered on the Park, the nearest sports light standards will be about 500 feet away. Light intensity generally falls off in proportion to the square of distance, so one would expect the apparent brightness to be greater than illustrated in Photo 4.

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This simulation could be accomplished in a manner similar to the night simulations of the Sutro Heights view. A normal photo of the scene taken in the evening would be overlaid by a photo of similar sports lights taken at ground level, with the appropriate orientation relative to the lighting fixture, at a distance of about 500’. The lights at Crocker-Amazon fields are the same type as proposed for this project (page IV.B-33). They can be used as the subject of the simulation overlay. Care would have to be taken to ensure the photographic exposure of the lights in the overlay matched the exposure of the base view.

## 2. The simulations must use credible techniques appropriate to the circumstances.

- Evening and night views are particularly sensitive to the techniques used to control the exposures of the base photographs and the project lighting overlays. Consider Figure IV.B-10, which simulates an evening view from Sutro Heights southward towards the Beach Chalet Fields. The fields are about 3,500 feet from the viewpoint. The lower image in the Figure would lead most people to believe that the visual impact of the project will be modest. The brightness of the field and of the sports light lamps themselves seem low and at about the same level as neighboring traffic and street lights.

The process used to produce this image is described on pages IV.B-33 and 34: A base photo of the scene was taken (Upper half of Figure IV.B-10). An existing artificial turf field with similar night lighting (Crocker Amazon) was identified. A night photo was taken of the fields at a distance similar to the Sutro Heights view point (lower half of Figure IV.B-11). A portion of this photo was cropped, rotated, and inserted as an overlay onto the base photograph. The resulting overlaid photo was the simulated view seen in the lower half of Figure IV.B-10.

I was surprised at the dimness of the lit fields in the Sutro Heights simulation, so I performed an experiment. On a recent evening, I went up to Alta Vista Drive and took my own photo of the Crocker-Amazon fields. I adjusted the exposure of the shot to the point that the captured image matched the brightness of the actual scene as well as possible. My horizontal distance to the fields was about 3,600 feet – a good match to the actual Sutro Heights view point.

Photo 5 is the lower photo in Figure IV.B-11 of the DEIR used as the overlay in the Sutro Heights simulation. Photo 6 is my photo from Alta Vista Drive. Remember that the exposure of this photo was adjusted to match what I could actually see that night. Despite the presence of intervening trees in my photo, the field surface is quite a bit brighter than the DEIR photo. Also note the extreme brightness of the point source lights associated with the sports lamps.

Control of photographic exposure (brightness) is a key issue in such a simulation. The exposure of the base photo must be at a level that credibly represents what a normal person would see at night from a view point. The overlay of the lit artificial turf fields must have a matching exposure. To give an extreme example, if I adjusted the brightness of an overlay to the level seen through a welder's goggle, then the resulting simulation would probably show the simulated fields as a black patch. **The final EIR needs to explain how exposure levels (brightness) of the base and overlay photos were controlled in these simulations. If sufficient control of this aspect was not exercised, then the night simulations should be re-done.**

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- Figure IV.B-9 simulates the view into the Park from 48<sup>th</sup> Avenue and Lincoln Way. The DEIR concludes, “... *the proposed lighting is unlikely to spill over the site’s boundaries substantially enough to adversely affect the surrounding neighborhoods. Also, the spillover would not affect the amount of light of the night sky.*” (page IV.B-34)

The base photo was apparently taken on a clear night. A very common feature of the western end of San Francisco, particularly on the late spring, summer, and early autumn evenings is fog or low overcast skies. The latter are a particular concern. The marine layer creates a thick cloud layer that can be as much as 1,500 feet thick. The floor of this layer varies in altitude from sea level to as much as 900 feet above sea level. A typical elevation would be about 500 feet above sea level. Within the cloud layer, visibility is similar to being in a fog bank –generally less than 100 feet. Below and above the cloud bank, the visibility is similar to general Bay Area visibility – varying between 5 to 20 miles.

The DEIR discusses the impact of ground fog in a sketchy and non-technical way on page IV.B-36. It draws conclusions about the dispersion of reflected light without presenting any facts. In effect, it ignores the impact of low overcast I described above.

A low overcast situation produces different results than a clear night sky. Under this condition, the brilliant sports lights shine down onto the plastic grass field. Some of that light is reflected back upwards into the sky. This reflected light travels upward and hits the bottom of the marine layer cloud bank. The cloud bank, in turn, reflects the light back downward. At each reflection the light is scattered. This both diminishes it’s intensity per unit area and diffuses it over a much wider area. There is a significant likelihood that the average illumination of the surrounding forests, meadows, beaches, and neighborhoods would be considerably increased under such conditions. Photo 7 is a photo of the summer night skies over the 2010 Outside Lands Concert taken from the northern edge of the Park, near Spreckels Lake. This puts the viewpoint about 1,300 feet from the Polo Fields. I have no detailed information regarding the type, intensity, or orientation of the lights in that instance. I simply offer the photo as an indication of potential adverse lighting impacts which have not been addressed in the DEIR. **The final EIR needs to do a rigorous analysis that takes into account the reflectivity and light dispersion characteristics of both the plastic grass field surface and the overlying cloud bank to determine the increase in sky brightness and ground illumination.**

### **3. The conclusions drawn from lighting simulations and studies need to be based on facts and commonly-accepted aesthetic principals.**

- As I have indicated above, there are many deficiencies both in selecting visual resources to be studied and in the actual implementation of those studies. Unless such errors and omissions are remedied, the conclusions of the Aesthetic Impacts section have no basis in fact.

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- In another comment letter on historic resources, I cited some examples of arbitrary aesthetic judgments made in the DEIR. I will discuss an additional case involving the assessment of night lighting impacts. As indicated above, the night sports lighting creates intense point sources of light that stand out at great distances. In reviewing the simulated view from Sutro Heights, the DEIR states, *“Although the lights would draw attention with the intensity of the lighting, they would not dominate this panoramic view, because includes many different features and covers a vast area. Thus, this change is not considered substantial and the effect would not be significant.”*

What aesthetic principal is being applied in this instance? It seems to somehow involve the fraction of the total area of a scene. It implies that a visual impact, however distracting and incongruous to the rest of the scene, is not significant if it only covers a small percentage of the visual field. We all know that it not the case in real life. We all remember as teenagers, dreading that pimple that would pop up on the end of our nose. That pimple was focused on by everyone we ran into that day, whether they wanted to notice it or not. Will the new lighted field become the pimple on the face of Golden Gate Park?

Clearly, aesthetics is a somewhat subjective topic. **Is there a recognized authority for the aesthetic rules being applied by the DEIR?**

Greg Miller  
1243 42<sup>nd</sup> Avenue  
San Francisco, CA 94122

10



Photo 1:

Views over and through the trees from the old railroad path looking south east – the light towers will be clearly visible here, both during the day and at night.

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Photo 2:

Views under the trees from the old railroad path looking south-east.

This vegetation is kept trimmed up by staff from the ground level, for clear views of the path from the fields and back again. The low newly-planted vegetation are native plantings that are unlikely to grow up to screen the fields at ground level.

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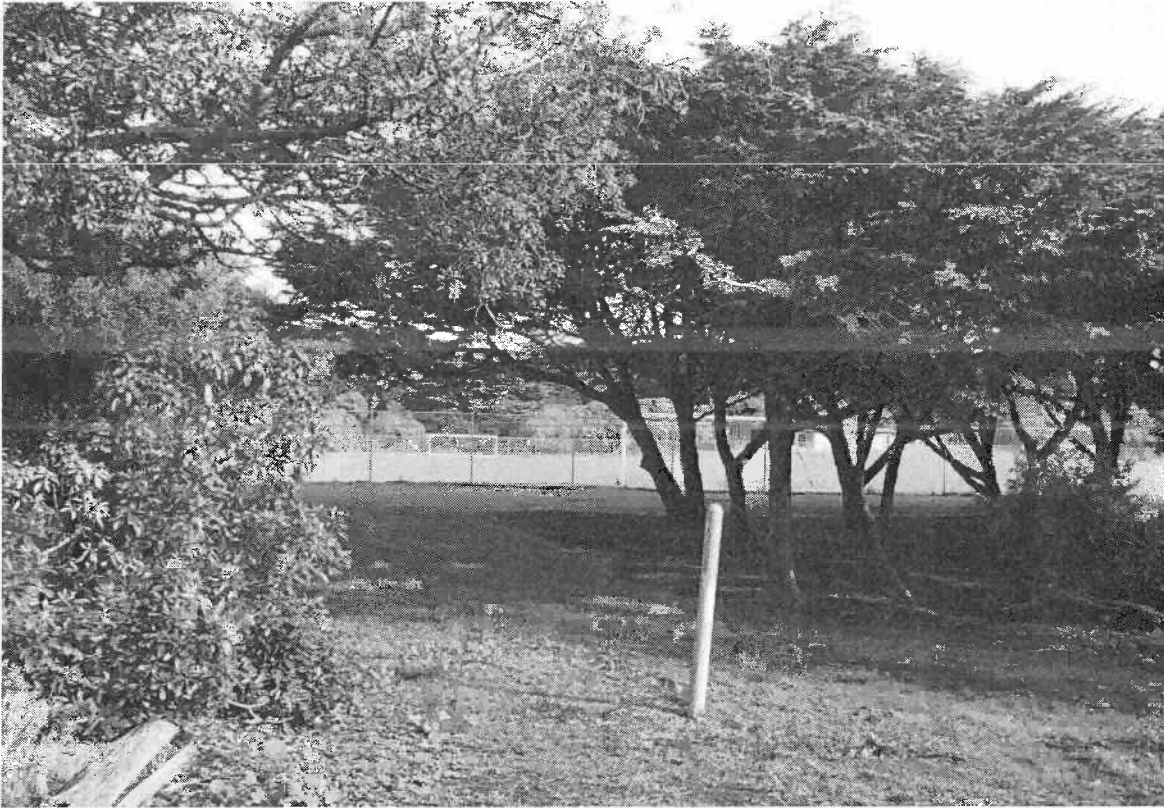


Photo 3:

Views under and through the trees from the old railroad path looking east.

This vegetation is kept trimmed up at the ground level, for clear views into the playing areas. The tops of the trees are wind-pruned and are unlikely to grow much higher.

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cont.



Photo 4:

Night Sports Lighting at South Sunset Playground as seen from the Intersection of Wawona and Great Highway, a Distance of about 2,400 feet.

Note that the distant sports lights are bluish in color while the nearby street lights are yellowish.

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Photo 5 - Image of Crocker-Amazon Fields used in DEIR as an overlay for Simulation of Night View from Sutro Heights.



Photo 6 - My photo from a similar viewpoint,- exposure adjusted to match what I could see.

14



Photo 7

View of the overcast night sky above the 2010 Outside Lands Concert taken from the north side of the Park, looking across Spreckels Lake. Time: approx. 9:30 p.m. after full sunset.

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1243 42<sup>nd</sup> Avenue  
 San Francisco, CA 94122  
 December 11<sup>th</sup>, 2011

Mr. Bill Wycko  
 Environmental Review Officer  
 Beach Chalet Fields Renovation  
 San Francisco Planning Department  
 1650 Mission Street, Suite 400  
 San Francisco, CA 94103

**Re: Public Comment on Draft EIR – Project Design and Operations**

Beach Chalet Athletic Fields Renovation  
 Planning Department Case No. 2010.0016E  
 State Clearinghouse No. 2011044005

Dear Mr. Wycko,

The following comments pertain to aspects of project design and operations. **My questions and requests for amplification are stated in Bold.**

**Field Fences:**

I was pleased to see the project would replace the existing unsightly 8' high chain link with 3 ½' black vinyl fencing. It is one of the few project components that tries to maintain the balance between the needs of active team sports and the naturalistic character of the surrounding parklands.

In the past year, Golden Gate Park was the target of a series of vandalisms – trees were cut down in the Music Concourse and playing fields were torn up. I understand that synthetic turf is quite vulnerable to vandalism such as cutting the netting and burning the turf. Repairing such damage can be quite costly. The City of San Diego reported one particular field was set on fire in two separate instances and cost about \$10,000 to repair. (City of San Diego Memorandum, "Guidelines on the Use of Synthetic Turf within the City Park System", May 10, 2011)

As the DEIR points out in several places, the Beach Chalet meadow is surrounded by park forests and is can not be seen from city streets and park roads. Also, it is not directly viewable from any occupied buildings such as the Beach Chalet.

It seems that over 7 acres of costly synthetic turf will be quite vulnerable to malicious damage once the lights are turned out and everyone goes home. A 3 ½ foot high fence will not provide a significant security barrier.

**How will the City protect its investment? If the turf is vandalized several times, will the nice-looking short fence proposed in the project be replaced with a much taller, padlocked security fence?**

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**Forestry:**

The project calls for the removal of 16 “trees” and 44 “shrubs”. I am not certain that this distinction between “trees” and “shrubs” is either technically valid or practically useful in this context. The “shrubs” are *Myoporum Laetum*. Many are over 30 feet tall. They are tough and salt-resistant and were deliberately planted in this area to serve as the first line of defense in shielding the rest of the park forest from stiff ocean breezes.

Mitigation Measure M-BI-3 calls for tree replacement: *“The SFRPD shall replace the trees removed within SFRPD-managed lands with trees of equivalent ecological value (ie., similar species) to the trees removed. If trees of equivalent value are not feasible or available, removed trees shall be replaced at a ratio of 1 inch for 1 inch of the diameter at breast height of the removed tree.”*

**Does this Mitigation apply to the 44 “shrubs” as well as the 16 “trees”? How will SFRPD select replacements species and select planting locations in a manner that will maintain the integrity of the Park’s western windbreak?**

**Lighting:**

Page IV.B-36 states, *“A lighting study prepared for the proposed project by Musco Lighting illustrates that within a very short distance of the project site boundaries (approximately 150 feet), light measurements at heights of approximately 60, 70, 80, 90, and 100 feet above ground would drop to zero, due to the shielding and focusing of the lights.”* The associated footnote 7 cites, “Musco Lighting, Illumination Summary, January 29, 2010 and April 28, 2010”. On Friday, December 9, 2011, I examined the cited report in the SF Planning Department files. **The Musco report is out of date – the number of sport lighting standards, their location, and the total number of lamps supported by the standards do not match the lighting system proposed in the DEIR on page II-15.**

**Sound Systems:**

Page II-22 states, *“Amplified sound is not included as part of the proposed project”*. Considering that site will host tournaments, amplified sound seems like a natural addition. **What public process would be required to add a sound system in the future? Will this EIR contain any standards or protections to limit sounds and the use of amplified sound systems?**

**Operations – Field Rest Periods:**

Page II-9 discusses field closure policies for the existing Beach Chalet fields, *“To allow the grass to rest and re-grow, only three of the facility’s four athletic fields are open at any one time and all the fields are closed to the public 3-4 months each fall and/or winter.”*



This adds up to a great deal of field rest:

$$\begin{aligned}
 \text{Total Rest Per Year} &= \text{Winter Rest} + \text{1 out of 4 fields resting at other times} \\
 &= 4/12 + (8/12) * (1/4) \\
 &= 1/2 \text{ year (26 weeks) for scheduled field rest}
 \end{aligned}$$

**Is this a typical field rest regime for grass athletic fields or is it specific to the existing Beach Chalet fields because of site location/environment, deficiencies in field construction, or cumulative deferred maintenance? The grass playing fields at West Sunset are also located close to the ocean. What has been the field closure history for those fields over the past three years?**

05  
cont.

Page II-9 also states, "... in the past two years, the fields were closed in the summer for rest and re-growth due to scheduling conflicts". **Was the normal 3-4 month winter field rest period eliminated in these two years? How did a scheduling conflict cause a shift/addition in the field resting schedule?**

#### **Operations – Maintenance:**

Page II-9 states that the existing fields are closed every Monday for maintenance and page II-10 reports that 1/3 FTE is used for maintenance on a continual basis. Over the past several years, I have often passed the fields on informal walks of on my way to the local Safeway. I have only seen SFRPD gardeners working on the fields one time, when the fields were being re-stripped. While I did see the assigned gardener many times, he was always in his maintenance room, next to the field rest rooms. **Why are the existing fields closed every Monday, all day?**

06

Page II-24 describes the maintenance planned for the new fields, "*It is expected that staffing at the project site would not increase and that 1/3 FTE maintenance staff would continue to maintain the facility. Maintenance would consist of garbage pick-up, and periodic sweeping, and as needed, spot washing of the synthetic turf...*"

07

On the other hand, Table II-4 does not indicate any required closures for routine maintenance of the new fields. **When will the required maintenance be scheduled?**

#### **Operations – Field Usage Scheduling:**

Table I-1 presents an "*Existing Weekly Schedule During High Use Periods (Spring)*". **Is this information historical scheduling data for the Beach Chalet Fields as experienced on a particular week in the past or is this some type of average? What is the source of the data?**

08

Page II-10 reports two high use periods (9/1 – 11/30 and 3/1 – 5/31). **Is this pattern particular to the Beach Chalet facility or does it apply to field demand patterns for all of San Francisco? How variable is total field demand over the course of a year?**



The City Fields Foundation (a private partner of the City) has generously helped the City implement a new electronic field reservation system. In the foundation's own words, *"As a key part of the MOU and the partnership, the changes to the Recreation and Parks Department's field reservation system have significantly increased the hours of organized play on city athletic fields — adding an additional 35,000 hours of playtime to San Francisco fields each year. This happened through more efficient field allocation and the Department's ability to place more teams and players on each field. The revised system also ensures more equitable and transparent access to playfields for San Francisco residents, since the computerized system tracks users' addresses, giving higher priority to players that live in the city and to non-profit leagues serving low-income communities. As a result, more San Franciscans now enjoy better athletic fields for practices and games. Thus, the Playfields Initiative motivated the Recreation and Parks Department to take a more consumer-oriented approach, with more sensible field allocations and a more accessible and transparent reservation and permit system."* ("Giving Every Child a Place to Play Ball – A Case Study for the City Fields Foundation, 2010", Anne Schonfield, City Fields Foundation.)

**Please use this system and/or other information to report aggregate soccer field utilization over time – by this, I mean the percent of all City soccer fields actually used in each month for at least one recent consecutive 12 month period. The main statistic for any given month would be the ratio of total field hours used to total field hours available. Please show how much of the demand came from the major user groups discussed in the DEIR – school teams, youth soccer leagues, and adult leagues. For each group, please indicate the proportion of each category representing San Francisco residents. Figure 1 of this paper illustrates the report I have in mind.**

Table II-4 shows similar high use period scheduling for the new project. It shows the night time slots made available by the sports lighting system. One of the project objectives is to *"improve safety and increase nighttime use"*. No matter how much lighting is used, attracting young children to the park after dark might not be a good idea. **What type of teams will be using the fields after dark?**

Greg Miller  
1243 42<sup>nd</sup> Avenue  
San Francisco, CA 94122

FIGURE 1

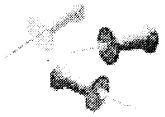
**Sample Field Utilization Report**

Line #	Notes	Jan	Feb	Mar	.....	Dec	Annual Total/ Avg
	Field - Hours per Month:	(1)					
	SF Residents:						
1	School Teams						
2	Youth Soccer Leagues						
3	Adult Leagues						
4	Subtotal: SF Resident Usage	(2)					
	Non-SF Residents:						
5	School Teams						
6	Youth Soccer Leagues						
7	Adult Leagues						
8	Subtotal: SF Resident Usage	(2)					
	Mandatory Field Closures:						
9	Field Maintenance						
10	Field Rest Periods						
11	Bad Weather						
12	Subtotal: Mandatory Closures	(2)					
13	Available, but not Used	(3)					
14	Total Field Hours Potentially Available	(4)					
	Utilization Ratios for the Month:						
15	SF Resident Usage	(5)					
16	Non-SF Resident Usage	(6)					
17	Mandatory Closures	(7)					
18	Not Used	(8)					

**Notes:**

- (1) A "field-hour" is one field normally used for Soccer or Lacrosse in SF counted for one hour during normal hours of operation. The figures in this section would be the total field hours in a given month by type of use or mandatory closure for all fields in SF.
- (2) Subtotal of monthly field-hours listed in the previous three lines.
- (3) Total monthly field-hours during normal hours of operation not used or subject to mandatory closure.
- (4) Total monthly field-hours listed in lines 4,8,12, and 13.
- (5) Line 4 divided by line 14, expressed as a percent.
- (6) Line 8 divided by line 14, expressed as a percent.
- (7) Line 12 divided by line 14, expressed as a percent.
- (8) Line 13 divided by line 14, expressed as a percent.





Bill Wycko/CTYPLN/SFGOV  
11/30/2011 05:14 PM

To Don Lewis/CTYPLN/SFGOV@SFGOV, Sarah B  
Jones/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: Beach Soccer Fields

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 11/30/2011 05:15 PM -----



Albert Minvielle  
<minvielle@sbcglobal.net>  
11/30/2011 11:25 AM

To bill.wycko@sfgov.org

cc Sarah Ballard <Sarah.Ballard@sfgov.org>, Patrick Hannan  
<patrick@cityfieldsfoundation.org>

Subject Beach Soccer Fields

What a GREAT idea. I am a native San Franciscan living adjacent to the park. I am an active volunteer in the park and a proponent of recreational uses on park land. I am also Co President of the Inner Sunset Park Neighbors and involved in developing community access to the park and its resources. My professional career included Director of Recreation at UCSF and Manager for the development of recreational facilities at Mission Bay. I was a youth soccer coach for many years and have a daughter who participated as a four year member of the State Team for Northern Cal and a Division 1 player for the University of Oregon. She continues to play today at an adult premier level.

The park is for everyone and needs to provide diverse applications of space and resources for the common good. In these times of fiscal austerity we need to look at how to get the most out of existing resources and how to control the cost of operations. The proposal to install synthetic turf fields and illuminate them is a creative and prudent proposal. As a professional in the field, as a parent and coach, as a citizen of the city and an advocate and steward of our wonderful park I support this effort.

Why lighted and artificial turf soccer fields at the Beach?

Continuation of a long time existing use.

Provision of a multi cultural social experience that enriches our community.

Extending the user hours to support working adults.

Safe play surfaces for our kids.

Increasing the number of annual play days and weekly play hours for resources that are in great demand.

Reducing operational costs for field maintenance and future field replacement.

Providing much need resources for physical activity in a neighborhood that is deficient of field space.

Providing a constructive outlet for youth throughout the city.

Providing quality facilities that will support high levels of play and improve sports programs in schools and recreational clubs.

In my capacity as Director of Recreation at UCSF I did extensive research on both

01



synthetic turf and field lighting. Both have developed over the years to address issues of safety and community impact. Today's turf fields are safer and more economical than any other surface. They provide a top quality playing surface that can be utilized under almost any conditions. They are low maintenance and cost effective to replace. Contemporary field lighting is down cast and restricted unlike the "stadium lighting" of years past. In addition to its controlled dispersion the lighting is further restricted by the natural shrubbery in the area and the distance from any residential housing. These fields would be a HUGE asset to our community and should move forward with haste. Every day of delay is a loss of benefit to our kids and our community.

01  
cont.

Al Minvielle  
Co President Inner Sunset Park Neighbors  
415-664-0456



leo mora  
<leomora@cwnet.com>  
12/09/2011 08:54 AM

To sfoceanedge@earthlink.net, bill.wycko@sfgov.org,  
don.lewis@sfgov.org  
cc  
bcc

Subject Beach Chalet Soccer Fields - DEIR comment letter

hi my name is leo mora i went to polytechnic high school played  
soccer at that field for two years i don,t think upgrading it  
will keep the quality it now enjoys.

01