

Regarding;

Construction Scheduling and Staging

"The project would require excavation to a depth of approximately 1 foot below ground surface (bgs) for most project elements and approximately 10 feet bgs for the installation of ten 60-foot-tall light standards." (DEIR Page II-21)

It is our position that this description leaves out a very substantial below ground "wall" whose purpose is an attempt to contain the leachate from the field. This subterranean "wall" sits approximately 5 foot below ground surface (bgs) and is greater than 12 inches wide. This wall will circumvent the 9 acre installation, (approximately 1.5 miles).

It is our position that the environmental impact of such a massive structure needs to be included in the EIR.

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Kimball Field (SF), synthetic field "pour forms" placement



NOISE LEVEL COMPARISONS BETWEEN ARTIFICIAL TURF AND GRASS

Artificial fields have even been found to be 8 to 10 decibels noisier than natural grass. This would have a significant impact on adjacent activities in the park or to neighborhood parks as would be the case with "Alternative, 2) Off-Site Alternative".

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SBR TIRE CRUMB MIGRATION

2500 tons of pulverized SBR Tire Crumb would be introduced onto the site in a loose and uncontained fashion. It can and will migrate away from the site into the surrounding environment in a myriad of ways. It is our position that this is an environmental impact and should be included in the EIR.

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THE VULNERABILITY OF SYNTHETIC FIELDS TO VANDALISM

"Given the incidents of arson fires in playgrounds using synthetic turf fields with rubber infill, the Task Force report states that synthetic turf fields should be considered potentially flammable", (DEIR IV.H-7)

The fragile nature of the materials used are vulnerable to accidental and purposeful damage. Warranties may be void if the fields are not protected during non-athletic events.

The cost of acts of vandalism to both synthetic fields should include but not limited to;

- 1) graffiti, (tagging or other painted messages),
- 2) arson, (synthetic turf, even with fire-retardant, will melt if set on fire with an accelerant like gasoline).
- 3) purposeful biological vandalism.

Expensive surveillance equipment and cameras are increasingly being utilized to protect synthetic fields.

The DEIR reports that, "SFRPD staff indicate that the two known incidents of fires in playgrounds using synthetic turf fields with rubber infill have been arson fires", (DEIR IV.H-7)

It is our position that anonymous SFRPD staff are not be the most reliable resource for accurate data. Here is a partial list of some incidences they seem to have overlooked.

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FIRE & ARSON

- **OEHHA study** told of "a fire in a playground surface made of chipped tires at the Yulupa Elementary School in Sonoma County." (DEIR page IV.H-5)
- **Richmond, CA**
Vandal(s) left a crater-like burn mark on synthetic turf field.
- **Boston , Massachusetts**
Vandals set fire to highly flammable artificial turf , damage, \$50,000 worth.
<http://www1.whdh.com/news/articles/local/BO60539/>.
- **Scotch Plains, New Jersey**
Vandals burned a bad rendition of a swastika onto the new synthetic field.
http://www.nj.com/news/index.ssf/2009/05/three_westfield_teen_arrested.html.
- **Arlington, Massachusetts**
Fire on a synthetic field, (fireworks, lighter fluid, cigarette burns).
- **Charlestown, Massachusetts**
Vandals set ablaze rolls of turf waiting to be installed.
http://wbztv.com/topstories/local_story_214213322.html
- **Naperville, Illinois**
Someone set artificial turf on fire, possibly using a flare, \$10,000 damage.
<http://www.myfoxchicago.com/dpp/news/metro/north-central-college-naperville-artificial-turf-set-on-fire-arson-reward-20110831>

FIRE & ARSON (continued)

- **Delta, British Columbia**
Vandal(s) set fire to 250-sq.ft. area of the park's artificial turf field causing a \$10,000 damage. Authorities also identified fire damage to another turf field nearby.
http://www.bclocalnews.com/surrey_area/surreyleader/news/25382174.html .
- **Oregon State University**
Burn damage to the artificial turf, \$1,500-damage
http://www.gazettetimes.com/news/local/article_ed66beb8-0309-11e0-9560-001cc4c002e0.html .
- **Stamford, Connecticut**
Bonfire and spray paint damages artificial turf field
<http://www.stamfordadvocate.com/news/article/Arsonist-damages-Westhill-football-field-527255.php>
- **Middletown, Maryland**
Vandals torch artificial turf field. It caused about \$50,000 - \$75,000 in damage.
<http://your4state.com/content/fulltext/?cid=74601>
<http://www.fredericknewspost.com/sections/news/displayUpdate.htm?StoryID=93423> .
- **East Hampton, NY**
A 20-by-60-foot dollar sign that was burned into synthetic turf field will cost \$65,000 to repair.
<http://www.easthamptonstar.com/dnn/Home/News/ScorchedTurf/tabid/9518/Default.aspx> .
- **Glasgow, Lanarkshire**
Vandals torch turf field.
<http://www.rutherglenreformer.co.uk/rutherglen-news/rutherglen-local-news/2009/06/17/green-damaged-by-fire-vandals-63227-23893615/>
- **Watertown, NY**
Burns damages synthetic turf field.
<http://www.watertowndailytimes.com/article/20090528/NEWS03/305289964/-1/NEWS> .
- **Toronto, Canada**
A flare torch landed on the artificial turf causing a section to ignite causing \$2,000 damage.
<http://www.thestar.com/GTA/Crime/article/623324>
- **Bluffton, South Carolina**
Juveniles set fire to rubber mulch spread beneath the playground equipment.
<http://www.islandpacket.com/news/local/story/810815.html> .
- **Juneau, Alaska:**
Artificial turf field burned. The arson damage estimated between \$10,000 and \$25,000 to repair.
<http://juneauempire.com/local/2011-06-23/school-district-city-fighting-arson-vandalism> .

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cont**VANDALISM AND GRAFFITI**

- **Salisbury, Pennsylvania**
Vandals spray-painted racial slurs on artificial turf
<http://www.mcall.com/news/local/all-vandals-salisbury-061809-cn,0,5215509.story>
- **Lehigh Valley, PA**
Vandals spray paint slurs and other vulgar words onto artificial turf
http://www.lehighvalleylive.com/allentown/index.ssf/2009/03/vandals_spray_paint_artificial.html .
- **Destrehan, LA**
Vandals spray-painted graffiti and obscene drawings on the new artificial turf field
http://www.nola.com/news/index.ssf/2008/12/vandals_target_destrehan_high.html .

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VANDALISM AND GRAFFITI (continued)

- **Naperville**

Vandals used spray paint to damage new synthetic turf

<http://www.dailyherald.com/story/?id=308470&src=2>

- **Carson City, Nevada**

vandals spray-painted the artificial turf." This among the latest in a string of vandalism at the stadium.

"Another increasing trend is dog waste....crews are regularly cleaning up after dogs, but parts of the turf have already been damaged from urine."

<http://www.nevadaappeal.com/article/20110712/NEWS/110719956/1070&ParentProfile=1058>

- **Eudora, Kansas:**

Vandals painted profanities and rude images on the field's artificial turf

\$25,000 worth of damage

<http://www.kansascity.com/2011/07/13/3011279/vandals-damage-at-eudora-high.html>

- **Southfield, Michigan**

Vandals spray painted graffiti on a synthetic baseball field

cost of \$6,000 or the entire brown [infield] section for \$60,000.

<http://www.hometownlife.com/article/20110526/NEWS20/110526003>

- **Petal, Mississippi**

Graffiti spray-painted on artificial turf

<http://www.hattiesburgamerican.com/article/20100629/NEWS01/6290332> .

- **Escondido, California:**

Vandals had cut apart the large "E" printed on the turf.

\$5,000 in damage

http://www.nctimes.com/news/local/escondido/article_70a2f229-4fea-5d56-af0b-d227431e9e50.html

- **City of St. Catharines, Ontario, Canada**

Vandals spent a great deal of effort tearing out a section of the new artificial sports turf

expected to cost between \$14,000 and \$15,000

<http://www.niagarathisweek.com/news/article/1012182--vandals-steal-new-artificial-turf-section>

- **Melton, Australia**

A rectangular section of synthetic grass was stolen from playing surface

<http://melton-leader.whereilive.com.au/news/story/plastic-lawn-stolen-from-melton-sports-ground/> .

- **Charlotte, North Carolina**

Vandals cut several pieces of artificial turf field

Damage is estimated at \$7,500

<http://www.wcnc.com/news/local/Vandals-cut-turf-on-Ardrey-Kell-football-field-96145119.html> .

- **Baltimore County, Maryland**

Plan to install video surveillance cameras at artificial turf fields being damaged by vandals.

County to spend \$500,000 to monitor artificial fields

<http://www.explorebaltimorecounty.com/news/106802/cameras-help-county-turf-battle-with-vandals/>

- **Ann Arbor, Michigan**

Someone cut a piece of synthetic field at Michigan Stadium in Ann Arbor

Estimated damage at about \$1,000

<http://www.chicagobreakingsports.com/2010/03/piece-of-block-m-stolen-from-michigan-stadium.html>

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cont.

VANDALISM AND GRAFFITI (continued)

- **Eustace, Texas**

Vehicle left tire damage

Cost \$350,000 to \$400,000 to repair

http://www.athensreview.com/local/local_story_196224203.html .

- **Baltimore, Maryland**

\$600,000 to install 24-hour video surveillance cameras at five regional parks and at athletic fields that have frequently been the targets of vandals who have spray painted artificial turf fields, and damaged some by fire.

The county repaired more than \$150,000 in damages before the installation of cameras.

http://www.baltimoresun.com/news/local/baltimore_county/bal-md.co.cameras26may26,0,7218530.story .

- **Chatham, New Jersey**

Vandalism to turf injures player

Acts of vandalism have included "attempts to burn small parts of the field with cigarettes or lighters resulting in singed areas and areas where turf has been cut, torn or disturbed to create depressions in the field. A player fell in a depression created by vandals, tearing his ligaments and breaking a toe bone. Pencils that have been broken off and left sticking up the turf have also been found.

http://www.nj.com/independentpress/index.ssf/2009/03/vandals_strike_chathams_haas_f.html .

- **Sydenham (Melbourne), Australia**

Students vandalize turf field.

\$40,000 worth of damage

<http://www.cathnews.com/article.aspx?aeid=10686> .

- **El Paso, Texas**

Vandals damage synthetic turf field

The damage is estimated at \$15,000.

http://www.elpasotimes.com/newupdated/ci_10600842 .

- **Midland City, Ala**

Turf field vandalized by pickup truck on the synthetic field.

http://www.wztv.com/template/inews_wire/wires.regional.al/2753479b-www.fox17.com.shtml or

http://64.233.169.104/search?q=cache:FhOBAELh33YJ:www.fox17.com/template/inews_wire/wires.regional.al/2753479b-www.fox17.com.shtml+wztv+fox+17+quincey&hl=en&ct=clnk&cd=1&gl=us .

- **Jackson, New Jersey**

Town buys surveillance equipment for synthetic turf fields

- **Holliston (Massachusetts)**

Soccer team urinated on the opponent's field causing officials to disinfect the field for two-days.

<http://www.metrowestdailynews.com/homepage/x477569027>

<http://www.bostonherald.com/news/regional/general/view.bg?articleid=1029883>,

- **ANNAPOLIS, MD**

\$41,000 camera system would be installed because of its new artificial turf field.

http://www.hometownannapolis.com/cgi-bin/read/2007/08_14-41/TOP.

- **Woodside, CA**

tire marks in the artificial turf field,

http://www.almanacnews.com/news/show_story.php?id=9549

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cont.

SYNTHETIC TURF LIMITATIONS (Including Americans With Disabilities Act (ADA) QUESTIONS)**Synthetic Turf Installation,** (DEIR page IV.C-21),

In regards to the statement “allow for increased recreational use,” (DEIR page IV.C-21), it is our position that this statement needs to be amended by eliminating the word “increased”.

It is our position that converting the grass lawn to plastic and SBR tire crumb does not create more available play time but will effectively impose “decreased recreational use,” and eliminate a playfields use for many sports and recreational activities. The manufacturer’s warranty and the fragile nature of the synthetic surface excludes picnics, festivals, or fairs that involve structures, stakes, food, sports drinks, or any drinks other than water, sports that require a stake or pole or metal cleat. It is our position that a potentially, “universally”, usable field becomes usable to only a handful of sports.

The FieldTurf warranty prohibits repetitive training or repetitive marching on the same area of the field.

<http://www.scribd.com/doc/20862789/FieldTurf-Tarkett-Warranty>

Additionally, it is our position the claim, “allow for increased recreational use”, does not be factor in comparative calculations with grass fields with similarly installed drainage or lights.

The DEIR states, “Separate signage would also clarify that the following uses would not be allowed on synthetic turf fields: smoking, barbeques, alcohol, food, bikes, dogs, and metal cleats.” (DEIR II-24)

It is our position that signage that a surface is too fragile for bikes, (and in the case of Silver Terrace no baby carriages), and does not allow bikes on its surface runs the potential risk of discouraging athletes in wheelchairs from accessing the synthetic field or encouraging others to discriminate against wheelchair athletes. This runs the risk of non-compliance with current ADA requirements.

In regards to the statement “The elimination of grass turf and the introduction of replacement synthetic turf would reduce the Athletic Fields’ integrity.” (DEIR page IV.C-21),

it is our position this statement needs to be expanded. It is our position that this is an appropriate place to mention that the playing field would be altered from an organic material that produces a substantial amount of oxygen and sequesters a substantial amount of CO2 to a synthetic inorganic field that sheds VOHs, chemical particles, etc.

RECYCLING AND DISPOSAL OF USED TIRES

DEIR Page IV.H-25

The Beach Chalet SBR synthetic field would stockpile the equivalent of 250,000 pulverized tires in a public space.

Division 30, Chapter 16 of the California Public Resources Code, created a regulatory program for the disposal of waste **tires that are not recycled**. In accordance with these regulations, persons intending to store or stockpile 500 or more waste tires in California are required to obtain a major or minor waste tire facility permit and comply with waste tire storage standards. By definition, a major waste tire facility stores, stockpiles, accumulates, or discards 5,000 or more waste tires, and a minor waste tire facility stores, stockpiles, accumulates, or discards from 500 to 4,999 waste tires.

Waste tire laws, found in Division 30, Chapter 16 of the California Public Resources Code, created a regulatory program designed to reduce the **improper storage of waste tires**.

It is our position the pulverization and spreading onto The City of San Francisco’s public playfields is an **improper storage of waste tires** under the label of recycled.

MEMORANDUM OF UNDERSTANDING (MOU) AND CITY FIELDS FOUNDATION

The following notations are not meant to impugn the reputation of any group or individual but simply to fit the definition and CEQA requirements and intent that a lead agency "use its best efforts to find out and disclose all that it reasonably can" and that an EIR reflect "a good faith effort at full disclosure." Guidelines § 15144; 151.

An Agreement was made and entered into on February 16, 2006, by-and between the City and County of San Francisco, acting by and through its Recreation and Park Commission, and the City Fields Foundation C/O Pisces, Inc., a California law trust. The Beach Chalet Athletic Fields Renovation is covered by this agreement.

Since the Beach Chalet Conversion entails transferring responsibilities, and involves a partnership relationship with City Fields Foundation C/O Pisces Inc. which will have a direct impact on the proposed construction, and the areas subsequent maintenance and management, It is our position that all agreements and MEMORANDUMS OF UNDERSTANDING, (MOUs), between the City Fields Foundation C/O Pisces Inc. & the City and County of San Francisco should be included in the EIR.

City Fields Foundation C/O Pisces Inc. is a 501(c)(3).

The foundation managers are

- a) John J. Fisher, (president of Pisces, Inc. an investment management company for the "Fisher Family".)
- b) Robert J. Fisher (chairman of Fisher Development Inc., a general contractor & construction company)
- c) William S. Fisher (CEO of a private equity fund)

The following are some pertinent excerpts from the MOU made between City Fields Foundation (The Foundation), and the City and County of San Francisco (the City) / San Francisco Recreation & Parks Dept. (RPD) that pertain to the Beach Chalet renovation's environmental impact;

- "The Foundation will select a contractor or contractors of its choice to perform all services relating to site preparation and installation of the Fields." (MOU page 3)
- "Under no circumstances whatsoever shall the Foundation or its trustees be liable to the City for any damages suffered by the City or any third party (incidental, consequential or otherwise) arising out of the Foundation's or its trustees' acts or omissions related in any way to this Agreement or the construction or use of the Fields, unless specifically stated otherwise in this Agreement or in a subsequent writing signed by both Parties." (MOU page 10)
- "City's Waiver. Except as set forth specifically in this Section 11, the Foundation shall not be responsible for or liable to the City, and the City hereby assumes the risk of, and waives and releases Foundation and its Agents (as defined below) from all Claims (as defined below) for, any injury, loss or damage to any person or property in connection with any act or omission relating to this Agreement by the City or its Agents, and from all Claims (as defined below) for, any injury, loss or damage to any person or property in connection with any act or omission relating to the Turf Maintenance Services. Nothing in this Section shall relieve the Foundation from liability resulting from the act or omission of the construction contractor or contractors the Foundation selects pursuant to section 3.1(B), but the Foundation shall not be liable under any circumstances for any consequential, incidental or punitive damages." (MOU page 11)
- "RPD will make good faith efforts to include repair and replacement of the Turf in the Capital Program as future capital needs." (MOU page 6)
- "Indemnity. "The Foundation's obligations under this Section shall survive the expiration or other termination of this Agreement but for a period no longer than three (3) years after the termination of Construction Services at any Field". (MOU page 12)
- "City's Indemnity. Upon final completion of the Construction Services at each Field and acceptance of the work by the City, the City shall, for the accepted Field, indemnify, defend and hold harmless the Foundation, its officers, agents, employees and contractors, and each of them, from and against any and all demands, claims, legal or administrative proceedings, losses, costs, penalties, fines, liens, judgments,

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MEMORANDUM OF UNDERSTANDING (MOU) AND CITY FIELDS FOUNDATION (continued)

damages and liabilities of any kind ("Claims"), arising in any manner out of (a) any act or omission by the City, its officers, employees, agents, contractors or subcontractors (collectively "Agents"), or its invitees, guests or business visitors (collectively, "Invitees"), relating to the Project, (b) the use of any field by any member of the public, (c) the condition of or any alleged defect in any of the fields or related facilities, or (d) the Parties' decision to use turf for a field's surface.

- In addition to the City's obligation to indemnify the Foundation, the City specifically acknowledges and agrees that it has an immediate and independent obligation to defend the Foundation from any Claim that actually or potentially falls within this indemnity provision... The City's obligations under this Section shall survive the, expiration or other termination of this Agreement." (MOU pages 12-13)
- "Maintenance of Turf. The Foundation will select a contractor or contractors (including subcontractors) of its choice to perform all services relating to routine, ongoing maintenance of the Turf ("Turf Maintenance Services")." (MOU page 4)
- "RPD shall be responsible for all community outreach, public review and for obtaining all necessary governmental approvals in connection with the Project." (MOU page 5)
- "RPD will provide training and the necessary equipment to RPD staff for the maintenance of the existing Turf fields, Youngblood-Coleman and Franklin Square. Any future gifts of Turf fields from the Foundation will not include a maintenance contract if RPD demonstrates that it is maintaining Youngblood-Coleman and Franklin Square turf fields to the manufacturers' highest recommended standards." (MOU page 6)
- "The Foundation shall have the opportunity to place Appropriate signage at the Field Sites acknowledging the contributions of the Foundation and individual donors. The Foundation may make recommendations regarding the size, content and location of any such signage..." (MOU page 7)
- "Field Use. The Parties shall jointly and promptly develop an efficient, fair and equitable system by which the City will allocate Use of the Fields along with all City playfields," (MOU page 7)
- "Early Termination and Enforcement. **The Foundation may Terminate this Agreement due to the City's failure to comply with any term this Agreement (including all exhibits hereto) 30 days after having given the City notice of such failure**, unless the City cures that failure to the Foundation's reasonable satisfaction within that 30-day period, or a different reasonable timeframe mutually agreed upon by the Parties in writing." (MOU page 8)
- "the Foundation may bring an action in San Francisco Superior Court to enforce this Agreement," (MOU page 8)
- "Access to Information. The City shall provide to the Foundation reasonable access in the most timely manner possible to its employees and public records, including but not limited to construction documents and financial records, necessary to accomplish the purposes of this Agreement and to permit the Foundation to oversee the implementation of this Agreement." (MOU page 9)
- "Public Relations. The City and the Foundation shall use all good faith efforts to cooperate on matters of public relations and media responses related to the Project. The Parties shall use good faith efforts to cooperate with any inquiry by the other Party or by the public in regard to this Agreement. Any report or memorandum between the Parties shall be subject to the disclosure requirements of the City's Sunshine Ordinance and the California Public Records Act." (MOU page 9)

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MEMORANDUM OF UNDERSTANDING (MOU) AND CITY FIELDS FOUNDATION (continued)

The Board of City Fields Foundation, "The Team", (only individuals we feel are pertinent to deliberations for this EIR) <http://www.cityfieldsfoundation.org/about-us>

- **John Fisher** (president of Pisces, Inc. C/O City Fields Foundation)
- **Robert Fisher** (Pisces, Inc. C/O City Fields Foundation)
- **William Fisher** (Pisces, Inc. C/O City Fields Foundation)
- **Susan Hirsch** (president of Susan Hirsch Associates whose client list includes the "Fisher Family".)
- **Phil Ginsburg** (current RPD GM), (The Recreation & Parks Department is paying for this EIR)
- **Dan Mauer** (listed in the Beach Chalet DEIR as SFRPD Project Sponsor and Consultant.)
(No mention is made in the DEIR of his City Fields Foundation affiliation.)
- **Patrick Hannan** (Beach Chalet EIR Project Sponsor and Consultant)
- **Mack 5** (project management, construction management consulting firm for the renovations of Kimbell Playground, Mission Playground and the proposed Beach Chalet Renovation)
- **Yomi Agunbiade** (currently unlisted) (past RPD GM)
- **Matt Lockary**, (currently unlisted), owner of Baycor Builders, (at one time listed on his Baycor web site a business arrangement with City Fields / City of San Francisco for over \$50 million dollars).



A Nationwide General Contractor & Construction Management Firm

PROJECTS

| 2006 Project | Project Description | Total Contract |
|--------------------|---|-----------------|
| Richard Town Homes | Commercial Rehabilitate 199 units with a new community building and maintenance building | \$12,600,000.00 |
| CITY Fields | Commercial Rehab of San Francisco CA public parks (50 Parks) 2006 Project value \$5.8 Million The next five years (each year) \$10 million | \$5,800,000.00 |

| | | |
|--------------------|--|-----------------------|
| City Fields | Commercial Rehab of San Francisco CA public parks (50 Parks) 2006 Project value \$5.8 Million The next five years (each year) \$10 million | \$5,800,000.00 |
|--------------------|--|-----------------------|

Dawn Kamalanathan, (SF-RPD Beach Chalet Project Sponsor), is listed on the City Fields Foundation website as a "partners, volunteers, donors, supporters" along with Phil Ginsburg and Dan Mauer. <http://www.cityfieldsfoundation.org/thank-you>

Since its inception "The Team" of City Fields Foundation lobbyists have successfully fought EIRs for their previous projects by seeking and receiving special categorical exemptions.

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**California Environmental Protection Agency (Cal/EPA)
California Integrated Waste Management Board
and Office of Environmental Health Hazard Assessment (OEHHA)**

The following notations are not meant to impugn the reputation of any group or individual but simply to fit the definition and CEQA requirements and intent that a lead agency "use its best efforts to find out and disclose all that it reasonably can" and that an EIR reflect "a good faith effort at full disclosure." Guidelines § 15144; 151.

CAL/EPA finds itself involved with competing interests. On one hand it engages reputable scientists while at the same time it works with industries and groups with political and commercial agendas.

- Cal/EPA California Environmental Protection Agency is a state cabinet-level agency and is not part of the US Environmental Protection Agency, (EPA).
- OEHHA is a department within Cal/EPA. (California's Office of Environmental Health Hazard Assessment)
- CIWMB was a state agency under Cal/EPA. (California Integrated Waste Management Board) (abolished), (now CalRecycle)

CIWMB used incentive grants and loans to spur the private sector to market California's recycling industry with an emphasis in tire waste. CIWMB provided for the Waste Tire Playground Grant Program to promote markets derived from waste tires.

Charles Vidair (staff toxicologist at Cal/EPA - OEHHA) dominates the national, and possibly the world's, narrative regarding the toxicology of synthetic fields. He is the author of many of the reports most often cited in this Draft EIR as well as in the other government produced reports that are cited in this Draft EIR.

- 2007 INTEGRATED WASTE MANAGEMENT BOARD STUDY
"Evaluation of Health Effects of Recycled Tires in Playground and Track Products"
Authored by Charles Vidair, Ph.D., Robert Haas, Ph.D. and Robert Schlag, M.Sc.
- 2008 SAN FRANCISCO SYNTHETIC PLAYFIELDS TASK FORCE REPORT
Charles Vidair (author/member)
- 2009 Office of Environmental Health Hazard Assessment Study
"Chemicals and Particulates in the Air above the New Generation of Artificial Turf Playing Fields, and Artificial Turf as a Risk Factor for Infection by Methicillin-Resistant Staphylococcus Aureus (MRSA)",
July, 2009 – **Author Charles Vidair**
- 2010 CALIFORNIA DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY STUDY
"Safety Study 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. **Author Charles Vidair**
- 2011 Tire Conference entitled "Collaborating to Expand Market Opportunities, Making the Most of Your Product Marketing Opportunities" Speaker - **Charles Vidair** (also a speaker at the 2010 Tire Conference.)
- Mr. Vidair's reports listed above are cited in, the "Connecticut Studies", the "New York State Studies", the "Bainbridge Island Evaluation", as well as this DEIR.

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California Environmental Protection Agency (Cal/EPA)
California Integrated Waste Management Board
and Office of Environmental Health Hazard Assessment (OEHHA)

(continued)

Because Mr. Vidair's (OEHHA) reports and assessments have such a prominence we offer the following observations for context.

- Carbon Black was added to the California Office of Environmental Health Hazard Assessment (OEHHA) list of substances known to the State to cause cancer on February 21, 2003. This is never mentioned in any of Mr. Vidair's reports and studies, (2007, 2008, 2009, 2010), nor did he mention it at any of the 2008 San Francisco Synthetic Playfields Task Force Meetings.
- "New Generation of Artificial Turf" is a promotional catch phrase used to promote and market FieldTurf synthetic fields. Mr. Vidair never once used that phrase in his Studies prior to 2010. In his 2010 report, Mr. Vidair almost completely replaces the phrase "artificial turf" with "New Generation of Artificial Turf", (67 times).
 (FieldTurf / Tarkett Group is the largest entity in the sports synthetic fields industry with over \$1 billion annual revenue.) (Similarly, the national Synthetic Turf Council markets with the phrase "New Generation of Synthetic Turf")
- Only when pressed in a CBS 5 investigational report, (and after checking off-camera with his departments' press spokesperson), did Mr. Vidair admit to flawed testing with his "2010 California Department of Resources Recycling and Recovery Study" study.
 (YouTube - <http://www.youtube.com/watch?v=iJ5xlaR27AY>),



He admitted his department didn't hire contractors in time to conduct airborne tests during the hot summer months. He blamed the state budget crises and admitted that the results would be limited. He said, "Of course, unless we measure under these different temperatures, we will never know the exact relationship between temperature and volatilization of chemicals,"

CA State Senator Abel Maldonado (R), who authored the bill which called for the research study, called the study "unacceptable and incomplete".

Vidair says in the state study: --"It is not known if the following variables influence (particulate) and VOC release from artificial turf fields containing crumb rubber infill: 1) field age; 2) processing of tire rubber at cryogenic vs. ambient temperatures; 3) source of tire stocks (auto vs. truck tires); 4) tire age at the time of processing." --"The study only measured particle and VOCs above outdoor fields. Indoor fields have received much less attention. Since (particulates) and VOCs have the potential to accumulate in indoor venues, future testing indoors should be considered." --"The skin abrasion rate for artificial turf may vary according to age group and type of sport." --"The skin abrasion rate may be different for fields containing crumb rubber processed at cryogenic temperatures compared to ambient temperatures." --"The skin abrasion rate may vary with field age." --"It is not known if skin abrasions caused by artificial and natural turf heal at similar rates." --"Few data exist to evaluate whether the bacterial populations of artificial and natural turf vary according to the weather or season."

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cont.

HEAT AND HEAT ISLAND EFFECT

The only mention of heat issues in the DEIR is, “Because air temperature in the immediate area of synthetic turf can be higher than adjacent areas on hot or sunny days, creating what is known as a “heat island,” signage would encourage field users to hydrate.” – (DEIR page II-24)

It is our position that this is a glossing over of a potentially serious health issue, especially on synthetic fields. Synthetic Fields warranties prohibit the drinking of electrolyte replenishing drinks on the playing surface, (water only).

The “2008 San Francisco Synthetic Playfields Task Force Report” states, “Urban heat islands are created when natural areas are replaced by impervious surfaces like rooftops and asphalt, which absorb heat during the day, and continue to do so after the sun sets. SYNTHETIC TURF MATERIALS ARE ALSO IMPERVIOUS, and surface temperatures are higher than natural grass.” (page 14)

In fact, synthetic turf gets much hotter than natural grass.

National Public Radio did a story called “High Temps On Turf Fields Spark Safety Concerns” in which it was reported, “Since crumb-rubber turf absorbs and retains heat, the NYC Health Department report says heat is the primary health concern associated with playing on the fields. It says people can suffer dehydration, heatstroke and thermal burns at field temperatures above 115 degrees.

Based on these concerns, the New York City Parks Department has now decided to move away from using recycled-tire rubber in new turf fields. Commissioner Liam Kavanaugh says decisions have already been made regarding a couple of installations. “We have two fields in construction where we’ve actually canceled the black crumb rubber and are actively looking for an alternative,” Kavanaugh says.” <http://www.npr.org/templates/story/story.php?storyId=93364750>

The National Institute of Environmental Health Sciences (NIEHS), wrote, “Stuart Gaffin, at Columbia University, when using thermal satellite images and geographic information systems noticed that a number of the hottest spots in the city turned out to be synthetic turf fields.

Direct temperature measurements conducted during site visits showed that synthetic turf fields can get up to 60° hotter than grass, with surface temperatures reaching 160°F on summer days. For example, on 6 July 2007, a day in which the atmospheric temperature was 78°F in the early afternoon, the temperature on a grass field that was receiving direct sunlight was 85°F while an adjacent synthetic turf field had heated to 140°F. “Exposures of ten minutes or longer to surface temperatures above 122°F can cause skin injuries, so this is a real concern,” said Joel Forman, medical director of the Pediatric Environmental Health Specialty Unit at Mount Sinai School of Medicine, speaking at a 6 December 2007 symposium on the issue.

Many physical properties of synthetic turf—including its dark pigments, low-density mass, and lack of ability to vaporize water and cool the surrounding air—make it particularly efficient at increasing its temperature when exposed to the sun. This is not only a **hazard for users**, but also can contribute to the “heat island effect,” in which cities become hotter than surrounding areas because of heat absorbed by dark man-made surfaces such as roofs and asphalt. From many site visits to both black roofs and synthetic turf fields, Gaffin has concluded that the fields rival black roofs in their elevated surface temperatures.”

The “2008 San Francisco Synthetic Playfields Task Force Report” found, “In areas of San Francisco, extended periods of intense sunlight could potentially raise the field temperatures to a level that can contribute to the urban heat island effect.” (page 15)

The report goes on to say, “In recent years there has been a popular movement to create “living roofs” such as the one nearing completion on the new California Academy of Sciences museum in Golden Gate Park, to lessen the heat island effect caused by standard roofing material.” (page 14)

It is our position that the same healthy benefits will be accomplished by retaining a grass lawn such as the one at Beach Chalet Fields as well as other of San Francisco’s neighborhood grass parks.

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Field temperature measurements taken for the 2008 San Francisco Synthetic Turf Task Force.

SYNTHETIC FIELDS TEMPERATURES

The black tire crumbs are excellent solar collectors and can become painfully hot. A 98-degree day will produce a surface temperature on the synthetic grass of 173 degrees.

At head-level height the thermometer registers 138 degrees.

At Syracuse University the turf melted the bottom stud on one of a player's cleats.

The skin of young children and damaged skin are more susceptible to burns than other types.

First-degree burns (superficial) are thought of as surface burns.

Second-degree burns (partial thickness) involve the entire epidermis (top layer of the skin) and some portion of the dermis (second layer of the skin).

AMERICAN RED CROSS

| | 1st degree burn | 2nd degree burn |
|--------|-----------------|-----------------|
| 131° F | 17 seconds | 30 seconds |
| 140° F | 3 seconds | 5 seconds |

MEASUREMENTS WERE TAKEN CONTEMPORANEOUSLY AT SILVER TERRACE SYNTHETIC FIELD



AMBIENT OVER GRASS (5 feet high)



AMBIENT OVER PLASTIC / TIRE CRUMBS (5 feet)



CONTACT WITH PLASTIC MESH / TIRE CRUMBS



CONTACT WITH TIRE CRUMBS

It is our position that the conversion of tire waste into SBR Tire Crumb and dust not only maintains its waste-like properties but increases its hazardous properties.

It is our position that this is analogous to removing lead based paint from a hazardous waste site and painting your house with it. You have in fact recycled it, but you have also created a potential hazard to human health and safety or to the environment.

It is our position that the rebranding of tire waste as a safe recycled material is a desperate attempt by government agencies and the Tire Industry to justify years of indulgences in a business model of planned obsolescence. We feel, like the auto industry, it is time to get serious about public health and safety and start prioritizing wise environmental policy over corporate business practices.

It is our opinion that the artificial turf SBR tire crumb infill and plastic "turf" constitute hazardous materials as defined in Section 25501(h) of the California Health and Safety Code.

Hazardous materials. Defined in Section 25501(h) of the California Health and Safety Code, are "materials that, because of their quantity, concentration, or physical or chemical characteristics, pose a substantial present or potential hazard to human health and safety or to the environment if released to the workplace or environment."

It is our opinion that the artificial turf SBR tire crumb infill and plastic "turf" constitute hazardous waste according to Title 22 of the California Code of Regulations, Division 4.5, Chapter 11.

"Hazardous waste. Any material that is relinquished, recycled, or inherently waste-like. Title 22 of the California Code of Regulations, Division 4.5, Chapter 11 contains regulations for the classification of hazardous wastes. A waste is considered a hazardous waste if it is **toxic (causes human health effects)**, ignitable (has the ability to burn), corrosive (causes severe burns or damage to materials), or reactive (causes explosions or generates toxic gases) in accordance with the criteria established in Article 3. "

The US-EPA defines hazardous waste as, "Hazardous waste is waste that is dangerous or potentially harmful to our health or the environment." <http://www.epa.gov/osw/hazard/>

The US-EPA also defines hazardous waste as "Hazardous waste is defined as liquid, solid, contained gas, or sludge wastes that contain properties that are dangerous or potentially harmful to human health or the environment." <http://www.epa.gov/osw/hazard/>.

It is our position that the limited research reported in this DEIR is inadequate to make well-informed medical predictions regarding the impact on the complexities of human physiology as the result of exposure to SBR Tire Crumb. It is our position that the methodology utilized by reports cited in this DEIR to form opinions regarding the medical impact of SBR tire crumb and its constituents on the human body is unreliable and does not incorporate the cumulative and associative impact of all of its various chemicals and metals.

We suggest that the use of tests employed in the reports cited by this DEIR, (wipe tests, gastric simulations, air sampling, etc.), is analogous to trying to analyze the cumulative impact of ingesting cigarette tobacco into the human body simply by analyzing each of its chemical components in isolation.

It is our position that SBR tire crumb and synthetic turf present a combination of impacts that taken together or separately contribute to significant unavoidable impacts, significant impacts, and/or cumulative impacts. It is our position that the artificial turf SBR tire crumb infill and plastic "turf" present a significant hazard to the public and the environment.

THE SAN FRANCISCO PRECAUTIONARY PRINCIPLE.

The San Francisco Precautionary Principle is never mentioned in this DEIR.
It is our position that it should be prominently entered into this report.

It is our position that the following are pertinent excerpts to include into the EIR from the City and County of San Francisco's Precautionary Principle policy;

- "Based on the best available science, the Precautionary Principle requires the selection of the alternative that presents the least potential threat to human health and the City's natural systems."
- "Any gaps in scientific data uncovered by the examination of alternatives will provide a guidepost for future research, but will not prevent the City from taking protective action."
- "Where there are reasonable grounds for concern, the precautionary approach to decision-making is meant to help reduce harm by triggering a process to select the least potential threat."
- "There is a duty to take anticipatory action to prevent harm."

(Added by Ord. 171-03, File No. 030422, App. 7/3/2003)"

http://www.amlegal.com/nxt/gateway.dll?f=templates&fn=default.htm&vid=amlegal:sanfrancisco_ca

"It's a good idea to avoid using potentially harmful products if safer alternatives are available. And it isn't right that everyday citizens bear the risk of harm from products or practices that might be hazardous. That's why the city has adopted a Precautionary Principle Ordinance that doesn't merely ask if a product is safe; it also asks if the product is necessary in the first place. The precautionary approach seeks to minimize harm by using the best available science to identify safer, cost-effective alternatives."
– SFEnvironment

C. Environmentally Superior Alternative

The DEIR states, "The No Project Alternative would be the environmentally superior alternative." (DEIR page VI-14)

It also is our position that the "No Project Alternative" is the environmentally superior alternative.

SPEAK

SUNSET PARKSIDE EDUCATION AND ACTION COMMITTEE

1329 7th Avenue, San Francisco, CA 94122-2507 (415) 979-4816

Planning Commission
1650 Mission Street
San Francisco, CA 94103

~~RECEIVED~~ 11-17-11
Beach Chalet
(D. Lewis)

Re: Beach Chalet Soccer Fields complex
Request for an additional 90-day comment period

Dear Planning Commissioners:

The Board of Directors of SPEAK met recently to discuss the Soccer Fields complex EIR and we believe that it is not possible for the public to review and understand this complex and controversial EIR in the short period before December 12, a date that is within the most intensive part of the holiday period when people are distracted and many are away.

01

This is a very controversial issue and difficult to bring to an environmentally desirable solution, so we therefore request an additional 90-day period for the EIR review.
Thank you very much,

Sincerely yours,

Mary Anne Miller
Vice President, SPEAK
Sunset-Parkside Education and Action Committee

November 15, 2011



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 SPEAKSANFRANCISCO@yahoo.com

Historic Preservation Commission
 1650 Mission Street
 San Francisco, CA 94102

HPC meeting on 11-16-11
2001-0016E
D. Lewis

Re Beach Chalet Soccer Fields Complex DEIR
 Case No 2001.0016E

Mr. President and Commissioners:

SPEAK (Sunset Parkside Education and Action Committee) has the following concerns about the draft EIR for the Soccer Fields complex at the western edge of Golden Gate Park near the Beach Chalet.

There are four landmark buildings within a few yards of the proposed sports complex. They are the Murphy Windmill, the nearby Millwright's Cottage, the Queen Wilhelmina Windmill and Tulip Gardens, and the Beach Chalet. All four are official City Landmarks. The proximity of these structures to each other is enhanced by a pathway which runs north-south and connects the four landmarks, parallel to the Great Highway. This pathway lies atop what may have been the historic trace of the Sutro Railroad which once connected H Street (now Lincoln Way) to the Sutro attractions at the foot of Sutro Heights, such as Playland-at-the-Beach. While this area has not yet been recognized as an historic district, if the Soccer Fields complex is approved, there will be little chance that sufficient historic connectivity and integrity will remain to qualify it as an historic district.

01

Secondly, the proposed Soccer Fields project should be reviewed together with 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.

02

Here are the main points of our concerns of the Soccer Fields DEIR:

1. the proposed project is the development of an expanded sports facility complex at a nationally recognized site on the National Register of Historic Places (NRHP);
2. this project should not be called a renovation: it is an extreme makeover and major expansion which will materially affect the NRHP status;
3. the DEIR treats separately and does not connect the four highly visible landmarks mentioned above; the DEIR does not adequately identify and describe them as a potential historic district and does not provide a fully dimensioned map showing the location of the proposed project within the potential landmark district;

03

4. adding artificial turf and stadium lighting designed to attract nighttime use in an area of Golden Gate Park which is designated to remain as a natural area goes counter to the policies of Golden Gate Master Plan and the Western Shoreline Area Plan of the General Plan; the 60 foot high light standards of galvanized steel would create a negative visual impact to the pastoral park setting and would violate Policies 2.1 and 2.2 for Conservation of Natural Areas of the Urban Design Element;

04

5. with the right graphics, it can be demonstrated that the impact of the proposed project would be visually significant; the EIR does not contain adequate graphics or photographs taken in sufficient light and thus the EIR says the project would not be visually significant (see the photographs presented in Figs, II-2, II-3 and II-5 which are so dark that they cannot be read and as such do not constitute readable graphics as required by CEQA);

05

6. an alternative to the proposed project should be developed which would show how a true restoration and renovation would enhance the historic resources; the EIR should carefully analyze the renovation of the Playing Fields with natural grass without additional lighting combined with the location of a high intensity sports complex to other areas such as the West Sunset Playing Fields;

06

7. the impacts of this project are a large amount of excavation and removal of soil which would make the change from grass fields to artificial turf an irreversible barrier to restoration at some future time; and,

07

8. approval of the project would foreclose any possibility of the West End of Golden Gate Park becoming a San Francisco historic district.

08

9. SPEAK suggests that HPC join the community by asking for a 90-day extension for the EIR comment period;

The proposed project will compromise the integrity of the historic buildings and compromise the visual and functional integrity with the increase in activity and hours of operation of the proposed sports facility.

09

Thank you for your consideration of our concerns.

Inge Horton
Chair, SAHRIC
Sunset Architectural and Historic Resources Inventory Committee

Mary Anne Miller
Vice President, SPEAK
Sunset-Parkside Education and Action Committee



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 SPEAKSANFRANCISCO@yahoo.com

Planning Commission
 1650 Mission Street
 San Francisco, CA 94102

Re Beach Chalet Soccer Fields Complex DEIR
 Case No 2001.0016E

Dear Commissioners:

SPEAK (Sunset Parkside Education and Action Committee) has the following concerns about the draft EIR for the Soccer Fields complex at the western edge of Golden Gate Park near the Beach Chalet.

1. Cumulative Impacts: Recycled Water Treatment Plant. The proposed Soccer Fields project should be reviewed together with the Recycled Water Treatment Plant which is also proposed for location at the western end of Golden Gate Park. The cumulative impacts of both proposed projects need to be evaluated together. There is more than enough information available to allow analysis of the proposed Treatment Plant vis-a-vis the Beach Chalet Soccer Fields.

01

Cumulative Impacts: Proposed Ocean Beach Plan. No mention or study is found in the document of the proposed Ocean Beach Plan although SPUR has brought together eight City agencies, as well as the National Park Service, and the planning is well underway. The objectives and future needs of Ocean Beach planning effort are available in advanced draft form.

Cumulative impacts: Precedent for future installation of artificial turf and stadium lighting should be studied as a part of cumulative impacts. The EIR should study the likelihood that if this project is approved, there would be subsequent attempts to convert the Polo Fields to artificial turf with stadium lighting. The EIR should study this eventuality whether or not it is affirmed by the project sponsor; the public senses this strongly as a possible precedent.

02

2. Impacts on the integrity of the National Register of Historic Places (NRHP) designation. The proposed project is the development of an expanded sports facility complex at a nationally recognized site on the National Register of Historic Places (NRHP). The DEIR does not adequately study the impact this construction of highly artificial playing fields and the introduction of night-time use will have on the NRHP status.

03

We request an analysis of project impacts on the integrity and quality of the National Register of Historic Places (NRHP) designation. We are concerned that there will be so much change to the character of this area that it will no longer have the integrity remaining to qualify it for the National Register. Compare the character of the area around Kezar Stadium in the extreme east end of the Park with the construction proposed here for the west end.

Historic Context: City Landmarks. There are four landmark buildings within a few yards of the proposed sports complex. They are the Murphy Windmill, the nearby Millwright's Cottage, the Queen Wilhelmina Windmill and Tulip Gardens, and the Beach Chalet. All four are official City Landmarks. The proximity of these structures to each other is enhanced by a pathway which runs north-south and connects the four landmarks, parallel to the Great Highway and is assumed to be the historic trace of the Sutro Railway, which once connected H Street (now Lincoln Way) to the Sutro attractions at the

04

foot of Sutro Heights, such as Playland-at-the-Beach. The EIR must evaluate the changes that will occur to the perception and the character of these landmarks when the proposed project is constructed in their midst. The EIR should examine in what ways the proposed project will compromise the integrity of the historic buildings and compromise their visual and functional integrity with the increase in activity and hours of operation of the proposed sports facility

04
cont.

3. The proposed project is the development of a new and expanded sports facility complex, not a "Renovation". The present Beach Chalet soccer fields are used today for soccer practice play, mainly after school. Before perimeter fencing was installed eight to ten years ago, there were after-school soccer games and casual, unscheduled pick-up games on this meadow. The meadow was designed to be a large open grassy field, following the "Picturesque" style which created in Golden Gate Park a series of alternating meadows, horticultural planted areas, recreation areas and forest. It should not be called a **renovation**. The DEIR does not study the project for what it is: an extreme makeover and major expansion which will materially affect the NRHP status. It is a new project, not a renovation and it should be studied as such. The word "RENOVATION" should not be permitted to remain in the project title as it is biased in favor of the project and glosses over the major construction program that is being proposed.

05

4. The "Users" of the proposed fields are not adequately described. Project proponents claim that an expanded sports facility with stadium lights will benefit children. However, children play mainly after school, as they do now on playing fields all over the city. The goal of this new facility will not be to schedule many more hours of play for school children. The goal is to create a magnet for adult soccer clubs whose members play after work and in the evening hours until 10 p.m. The DEIR must study objectively the claims that this facility is designed to serve children and that they are the main beneficiary user group; in fact, it is designed for a population of adults who belong to leagues which play competitively all over the greater Bay Area.

Comparable data should be obtained from the records of Recreation and Parks Department to show the program of usage at other similar soccer facilities as compared with the program for this facility. The lights will be on whether or not a field has subscribers who use it. For example, it is demonstrable that the South Sunset Soccer Fields are not used on a regular basis 365 days and nights a year. Yet the lights are automatically set to turn on 365 days a year. The EIR should record the pattern of usage on a monthly basis throughout the year in order to provide a reliable forecast of how the Beach Chalet facility would be used. Department records should be obtained to show hours of operation at each comparable facility, type of user served (schools clubs individuals), hours that a particular field was used. Seasonal use will vary; therefore the data that would be most useful would be broken down as to season of the year or months of the year.

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5. A Change of Use is proposed. What is the zoning district in which a sports facility may be located according to the Land Use tables in the Planning Code? When a use is changed from casual meadow playing fields to a full competition-ready facility with stadium lighting turned on 365 days a year, turf pavement over several feet of constructed underlayment, is that still the same category of use, or does that graduate up to another category of use? The argument should be substantiated that this facility would not amount to a change of use and presented in the EIR.

07

6. Visually significant impacts The proposed project would cause visually significant impacts from numerous vantage points but the EIR does not contain adequate graphics or photographs taken in sufficient light. Most photographs appear to have been taken near dusk and lack focused detail. There are many visual vantage points which are not represented, enabling readers to say the project would not cause visually significant impacts.

08

Visual identity will be significantly compromised. The DEIR treats separately and does not connect the four highly visible landmarks mentioned above that comprise the western portion of the NRHP designation. The DEIR does not adequately identify and describe these historic structures and does not provide a fully dimensioned map or site plan showing the relationship of the proposed project *within* this extraordinary array of landmarks. A significant impact will result on the visual quality of the west end of the Park; the graphics and the text are inadequate in showing this impact. A very dark satellite overhead image is not satisfactory.

08
cont.

7. Golden Gate Master Plan will be violated. Excavating and replacing the grass meadow by installing artificial turf and stadium lighting designed to attract nighttime use in an area of Golden Gate Park which is designated to remain as a natural area goes counter to the policies of Golden Gate Master Plan and the Western Shoreline Area Plan of the General Plan. The 60-foot high light standards of galvanized steel would create a negative visual impact to the pastoral park setting and would violate Policies 2.1 and 2.2 for Conservation of Natural Areas of the Urban Design Element.

09

8. Transportation Impacts. Being on the extreme west side of the City the proposed fields will generate mainly automobile traffic since the site is difficult to reach via public transportation.

- Automobile use will be necessary for access because the site is not well served by public transportation
- The lack of adequate public transit and its distance from the facilities will create a significant traffic impact.
- There is no map showing how people taking public transit would arrive at the proposed facilities.

10

9. Incorrect compass location information. The Project Objectives state incorrectly that this site is "on the north side" of the City and would help to meet the recreation needs in the northern sector of the city. Please note that this site is in the extreme **west** of the city, and not the north. Thus it cannot be said to meet the athletic needs of the north side.

11

Site Defects. The site is too far from the centers of population. Virtually no one will walk there; some youth will bicycle there. Mainly players will arrive by automobile.

12

9. Alternatives. An alternative to the proposed project should be developed which would show how a true renovation would both restore and enhance the historic resources; the EIR should carefully analyze the renovation of the Playing Fields with natural grass without additional lighting combined with the location of a high intensity sports complex to other areas such as the West Sunset Playing Fields.

13

SPEAK believes that a suitable Compromise Alternative exists which would meet almost all of the project objectives. SPEAK requests that this alternative should be added to the DEIR to permit decision-makers an ample range of decisions, whether or not the project sponsor wishes it. That alternative is attached.

10. Irreversible and unsustainable. The changes that would occur are irreversible and unsustainable. The document does not address the irreversible character of the construction of these soccer fields. There will be a large amount of excavation (how much?) and removal of soil which would make the change from grass fields to artificial turf an irreversible barrier to restoration at some future time. If a decision were made later to reverse this unsustainable process, and remove the artificial materials, it is hardly conceivable that suitable soil for growing natural turf again could be obtained at a price and in such a large quantity, except at very high cost. If there is no financial feasibility to replace the worn-out turf, replacement will not take place. The EIR should study Year Eight when the turf is worn out and no funds are available to replace this material; the material is not real soil and therefore not renewable. It cannot be renewed, it must be replaced. The city would be caught in a replacement cycle it could not afford. What does the EIR say about this forecast? Would

14

the fields have to be cordoned off with "Keep Out" and "Hazardous Materials" and removed from use?

The hazards of agreeing to this cycle of replacement without sufficient funds to do the replacement, means that the project would not be viable except for the first five to seven years. No funds are set aside for the replacement of the artificial turf every eight years. The breakdown and deterioration of the artificial materials would cause this project to be unsustainable; the artificial playing surface has to be replaced approximately every eight years. There would be cycles of eight years for the foreseeable future; each time, the plastic and latex materials would have to be removed for transport to a toxic waste disposal area. There is no mitigation for this impact unless city funds are earmarked for the purpose.

Other artificially surfaced fields in the Park have proved irreversible and unsustainable. The EIR should compare the artificial surfaces that were installed at the Golden Gate Park Horse Stables practice ring, constructed approximately twenty years ago at the east end of Little Speedway Meadow which illustrate this unsustainable situation. This practice ring was excavated, lined with gravel and topped with ground-up rubber tires (similar to the project proposal) and now has not been used or renovated for many years. The resulting removal from public use of an area which was a simple grassy meadow for casual play should be studied for its precedent in the case of this project, where grassy meadow land is proposed to be removed and replaced with a hard artificial surface which may not be usable after some years. The EIR should assess this eventuality. The horse stable practice field cannot now be used for anything, weeds have grown through some of the ground rubber and the area is fenced off from public access.

Thank you for your consideration of our concerns. Please send us two hard copies of the Final EIR including comments and responses.

Marc Duffett
President, SPEAK
Sunset-Parkside Education and Action Committee

Mary Anne Miller
Vice President, SPEAK
Sunset-Parkside Education and Action Committee

14
cont.



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RECEIVED AT CFC HEARING 12-1-11
2010.0016E
(D. LEWIS)

Re Beach Chalet Soccer Fields Complex DEIR
Case No 2001.0016E Public Hearing December 1, 2011

Dear Commissioners:

SPEAK (Sunset Parkside Education and Action Committee) has the following concerns about the draft EIR for the Soccer Fields complex at the western edge of Golden Gate Park near the Beach Chalet.

There are four landmark buildings within a few yards of the proposed sports complex. They are the Murphy Windmill, the nearby Millwright's Cottage, the Queen Wilhelmina Windmill and Tulip Gardens, and the Beach Chalet. All four are official City Landmarks. The proximity of these structures to each other is enhanced by a pathway which runs north-south and connects the four landmarks, parallel to the Great Highway and is assumed to be the historic trace of the Sutro Railway which once connected H Street (now Lincoln Way) to the Sutro attractions at the foot of Sutro Heights, such as Playland-at-the-Beach. We request an analysis of the impacts on the integrity and quality of the National Register of Historic Places (NRHP) designation. We are concerned that there will be so much change to the character of this area that it will no longer have the integrity remaining to qualify it for the National Register. Compare the character of the area around Kezar Stadium in the extreme east end of the Park with the construction proposed here for the west end.

01

Secondly, the proposed Soccer Fields project should be reviewed together with 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.

02

Here is a summary of the main points of concerns of the Soccer Fields DEIR:

1. The proposed project is the development of an expanded sports facility complex at a nationally recognized site on the National Register of Historic Places (NRHP). The DEIR does not adequately study the impact this construction of highly artificial playing fields and the introduction of night-time use will have on the NRHP status.

2. This project is the development of a new and expanded sports facility complex on the site of the former Beach Chalet soccer fields which comprised casual sports activity on a meadow in the west end of Golden Gate Park which was a large meadow, fenced in relatively recently, and thus should not be called a **renovation**. We believe that it has not been studied for what it is: an extreme makeover and major expansion which will materially affect the NRHP status. It is a new project, not a renovation and it should be studied as such. The word "**RENOVATION**" should not be permitted to remain in the project title as it is biased in favor of the project and glosses over the major construction program that is being proposed.

03

3. The DEIR treats separately and does not connect the four highly visible landmarks mentioned above that comprise the western portion of the NRHP designation. The DEIR does not adequately

identify and describe these historic structures and does not provide a fully dimensioned map or site plan showing the relationship of the proposed project within the potential landmark district. A very dark satellite (google) image is not satisfactory.

03
cont.

4. Excavating and replacing the grass meadow by installing artificial turf and stadium lighting designed to attract nighttime use in an area of Golden Gate Park which is designated to remain as a natural area goes counter to the policies of Golden Gate Master Plan and the Western Shoreline Area Plan of the General Plan; the 60 foot high light standards of galvanized steel would create a negative visual impact to the pastoral park setting and would violate Policies 2.1 and 2.2 for Conservation of Natural Areas of the Urban Design Element.

04

5. With the right graphics, it can be demonstrated that the impact of the proposed project would be visually significant; the EIR does not contain adequate graphics or photographs taken in sufficient light and thus the EIR says the project would not be visually significant (see the photographs presented in Figs. II-2, II-3 and II-5 which are so dark that they cannot be read and as such do not constitute readable graphics as required by CEQA).

05

6. An alternative to the proposed project should be developed which would show how a true renovation would both restore and enhance the historic resources; the EIR should carefully analyze the renovation of the Playing Fields with natural grass without additional lighting combined with the location of a high intensity sports complex to other areas such as the West Sunset Playing Fields. SPEAK supports the Compromise Alternative developed by Ocean Edge, a local group on which SPEAK has a seat on the Board. That alternative is attached.

06

7. The impacts of this project are a large amount of excavation and removal of soil which would make the change from grass fields to artificial turf an irreversible barrier to restoration at some future time.

07

8. Approval of the project would foreclose any possibility of the West End of Golden Gate Park becoming a San Francisco historic district.

08

9. The proposed project will compromise the integrity of the historic buildings and compromise the visual and functional integrity with the increase in activity and hours of operation of the proposed sports facility.

09

10. The Project Objectives state incorrectly that this site is "on the north side" of the City and would help to meet the recreation needs in the northern sector of the city/ Please note that this site is in the extreme **west** of the city, and not the north. Thus it cannot be said to meet the athletic needs of the north side. Being on the extreme west side is difficult to reach and the automotive vehicles will be necessart for access because the site is not well served by public transportation.

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Thank you for your consideration of our concerns.

Marc Duffett
President, SPEAK
Sunset-Parkside Education and Action Committee

Mary Anne Miller
Vice President, SPEAK
Sunset-Parkside Education and Action Committee

We support a Compromise Alternative to protect Golden Gate Park's naturalistic parkland, a multi-use meadow/playing field, and wildlife habitat - while providing more playing hours.

We believe that this can be accomplished by a combination of the DEIR alternatives. We ask that the EIR consider a **Compromise Alternative** as follows:

1. **Renovate the West Sunset Playground with an improved playing surface and night lighting for some or all of its fields -**
 - Benefit: extended playing time year-round for all ages in the evenings
 - Benefit: extended playing time in winter for youth soccer in the late afternoon
 - Benefit: location in the north-western part of San Francisco
 - Benefit: restroom facilities and bleachers already in place
 - Benefit: some night lighting already in place
2. **Renovate the Beach Chalet Athletic Fields with natural grass -**
 - Use contemporary field construction techniques, such as:
 - Good soil structure and soil improvement products for stronger grass roots
 - Effective subsurface drainage to cut down on loss of play time due to rain
 - State of the art irrigation to both provide full coverage of the fields and to also save water by irrigating only when needed
 - New sod
 - Gopher barriers and an active gopher control program
 - Fix up restrooms as needed
 - Introduce ADA access that is sensitive to the overall design concept of the park and consistent with other meadows in the park
 - Benefit: increases playing time at Beach Chalet in addition to the increase at West Sunset Playground
 - Benefit: preserves Golden Gate Park's parkland and remains consistent with the 1998 Golden Gate Park Master Plan and the 2004 National Register for Historic Places designation
 - Benefit: preserves wildlife habitat
 - Benefit: provides a quality, natural grass field for youth soccer
 - Benefit: preserves parkland for all other residents who wish to enjoy a grass field and parkland, where enjoyment is not dependent on the ability to participate in active sports
 - Benefit: preserves the existing trees and park windbreak
 - Benefit: meet's San Francisco's transit-first policy by not expanding the parking
3. **Do not add night lighting to the Beach Chalet Athletic Fields -**
 - Benefit: preserves wildlife habitat
 - Benefit: Preserves the beauty of the park during the day and Ocean Beach at night.
 - Benefit: preserves Golden Gate Park's parkland and remains consistent with the Golden Gate Park Master Plan and the Secretary of the Interior Guidelines.

11



November 20, 2011

To: Planning Commission
Fr: Judy Irving, THD
Re: Beach Chalet Athletic Fields DEIR
Action: Please extend comment period 90 days

The Telegraph Hill Dwellers' Parks, Trees, and Birds Committee requests that the Beach Chalet Athletic Fields DEIR public comment period be extended 90 days from its current deadline of December 1st. The report is lengthy, complex, and detailed, and we need more time to study it in order to craft an informed response. Two holidays will have intervened between the issuance of the DEIR (Halloween and Thanksgiving), and the current deadline. Many of our committee members are going out of town over the Thanksgiving weekend. For all these reasons, we ask that you please extend the comment deadline.

01

Thank you and best regards,

A handwritten signature in cursive script that reads "Judy Irving".

Judy Irving, Chair
Parks, Trees, and Birds Committee

Individuals

I-Anderson

From: Yeashore Community <yeashore@yahoo.com>
To: bill.wycko@sfgov.org, don.lewis@sfgov.org

Date: Monday, December 12, 2011 12:29AM
Subject: BEACH CHALET ATHLETIC FIELDS RENOVATION

Raja Anderson
 P.O. Box 22094
 S.F., Ca. 94122

December 12, 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 very strongly 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 1st, 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.

I strongly 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

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-
- A vertical number line with an upward-pointing arrow at the top. Tick marks are present at 11, 12, 13, 14, and 15. The segment between 11 and 12 is labeled "cont.".

A vertical number line with tick marks at 16, 17, 18, 19, and 20. The numbers are placed to the right of the line.

-
- A vertical number line with tick marks at 16, 17, 18, 19, and 20. The numbers are placed to the right of the line.

20

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

Please let me know that you have received this letter.

Sincerely,
Raja Anderson

From: "City Currents Editor Email" <cceditor@ccsf.edu>
To: <bill.wycko@sfgov.org>, <don.lewis@sfgov.org>

Date: Monday, December 12, 2011 01:00PM
Subject: Beach Chalet Athletic Fields Renovation Planning Department Case No. 2010.0016E

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 against this project to renovate the Beach Chalet Soccer Field with artificial turf and huge stadium light which will create glare and illumination totolly out of character with the surrounding environment of the park and the residential areas, both north and south of the park.

the EIR report erroneously states that this project will not have significant environmental or aethetic impact on the surrounding area. that is totally untrue. It will change the character of the outer Western Edge of GG Park forever, and not in a beneficial way.

Now it is natural, wild, a refuge for both humans and animals and birds. It conforms to the master plan of the park, which states that Western side of park was to be kept wild and nat.ral This plan will turn this area into another parking lot instead of a park. Must we pave paradise. . . . again?

Reasons:

1. artificial turf:

independent research has proved that the materials used in the a. turf are 100% toxic. This will be an environmental disaster for animals who live in the park, birds, and the water table and the ocean. How could anyone even contemplate such a thing, much less draw up plans. Unbelievably bad idea.

2. 60-foot stadium lights:

these will destroy the character of the night sky and cause a glare that will drive what few migrating birds we have left away. I have lived on the Great Hwy for 25 years. At first, for several years, I heard honking of migrating geese every season. Now, only one or two flocks each YEAR come to my attention. These lights, if installed will be the end of migrating birds along this Pacific Flyway.

05
cont.

When will that last flock of geese honk overhead in the night sky? Is this the legacy we want Golden Gate Park administration to have? The death of the habitats and the flora and fauna in the area? The stadium lights will destroy the ambient light in the heavens for everybody. Visually, these poles are ugly stalks sticking up about 30 ft above the tree line. Please don't do this to our park.

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3. Park is for everyone, not just soccer players. they are a small %-age of the population. the distress this will cause to a great number of visitors to the park should be considered when making your recommendations. It is extremely cold and windy out at the beach, anyway. why would someone want to play or watch soccer in such hostile weather for that sort of activity.

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4. Parking problems. the traffic and parking is already a problem out here on the beach. this will just add to the congestion and gridlock along the lower great highway and the upper great highway.

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4. RECOMMENDATION: Please consider the Compromise Alternative of natural grass and no stadium lights at all, and never any lights such as this at night at the western edge of the park, or anywhere in the park, for that matter. Consider renovating other areas that are truly designed to be soccer playing fields and not public parks for everyone, in other San Francisco areas.

09

BELOW IS MY TESTIMONY GIVEN AT THE DEC. 1 HEARING. (Please note correct spelling of my last name is Arack)

> good evening, my name is

patricia eric, I am a long-term resident

of the outer sunset on the

great highway 25 years.

I was shocked when I learned of

these plans to put an artificial

turf and these stadium lights.

I was further shocked when I

ready the air and

it was listed

as not a significant impact.

I beg to differ on what this project will lead to a
wonderful, wild, sandblasted natural environment.

It is a refuge for some many people, not just soccer players.

The character of the landscape
will be forever changed, this is not coney island.

This is not southern california beaches.

This is our golden gate park that was designed to be natural and the wild.

And a home for the animals.

Two things that I am very much against, the stadium lights.

This will cause a substantial degree of degradation of the
visual character at night area when I first moved into my
house, 25 years ago, I always
heard migrating birds honking
above as they flew by.

Each year, there are fewer and fewer. I hardly ever hear them now.

This project has put a light and heat island that will further
confuse any migrating bird and send them off course where they would avoid this
area which is a

pacific flyway altogether.

These lights will cause a glare.

The visual impact, if you see
this photograph, the stadium
polarizes very much higher than
the tree line, and I don't know
how many there are going to be,
but it is going to be a truly -- a true and-change to this environment.

The artificial turf, the young
girl that gave her presentation
about the hazards of this toxic substance was brilliant.

and should absolutely be listened to. This is not something that we should put in a
park.

Soccer players are a small
percentage of the population that use this park.

It is for everyone and it is also for the animals. [Chime]

Patricia Arack
Editor, City Currents
Office of Public Information
Telephone: 415.239.3817
Cell: 415.216.9221
cceditor@ccsf.edu

From: Ilana Bar-David [<mailto:ilanabardavid@gmail.com>]
Sent: Monday, December 12, 2011 7:52 AM
To: bill.wycko@sfgov.org; don.lewis@sfgov.org
Cc: SF Ocean Edge
Subject: Beach Chalet Athletic Fields draft EIR

Ilana Bar-David
510 48th Avenue
San Francisco, CA 94121

December 12, 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. I support the Compromise Alternative put forth by the public during the Planning Commission hearing of December 1st, 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.

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I was raised in San Francisco and chose to live and raise my children here (now across from Sutro Heights Park) because of the beauty and values of my fellow residents to cherish our magnificent parks, wild lands, and scenery. I do 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, it does not address a multitude of concerns. In particular, I would like the final EIR to address issues involving recreation. Specifically:

- 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? 02
- 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? 03
- 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? 04
- How will maintenance be handled with more traffic and higher use of the area? 04
- What will be the new, compared to the prior, custodian hours? How will this be financed? 04
- 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? 05

Thank you for your consideration of my request. 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,

Ilana Bar-David

From: Jean Barish <jeanbbarish@hotmail.com>
To: Bill Wycko <bill.wycko@sfgov.org>
cc: Don Lewis <don.lewis@sfgov.org>

Date: Monday, December 12, 2011 02:01PM
Subject: Beach Chalet Soccer Fields Renovation , Planning Dept. Case No. 2010.0016E

Dear Mr. Wycko,

Earlier today I submitted Comments and Questions for the subject DEIR. Unfortunately I became aware of an error in that document after sending it to you.

Attached above is a resubmittal of my Comments and Questions to replace the version I sent earlier. Kindly disregard the earlier version, and only consider this Final document.
My apologies for any confusion, and thank you for your assistance.

Kind regards,

Jean

Jean B Barish, Esq.
jeanbbarish@hotmail.com
415-752-0185

SAVE GOLDEN GATE PARK

Attachments:

DEIR_Letter Final_JB_12_12_11 _2_.pdf

JEAN B BARISH, Esq.
5758 Geary Boulevard
San Francisco, California 94121
jeanbbarish@hotmail.com

December 12, 2011

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

Re: **Beach Chalet Athletic Fields Renovation EIR**
Draft Environmental Impact Report
Case No. 2010.0016E

Dear Mr. Wycko:

This is in response to the Draft Environmental Impact Report ("DEIR") referenced above.

I am writing to express my opposition to this project, and to urge the Planning Department and other agencies and organizations of the City and County of San Francisco to not approve the installation of artificial turf with tire crumb infill, 60 foot high sports lights, enlarged parking, additional stadium seating, added paved walkways and other site modifications to Golden Gate Park in the area specified in the DEIR.

After reviewing the DEIR it is clear there will be many significant environmental impacts to Golden Gate Park that cannot be mitigated if this project is approved. Golden Gate Park has been described by the San Francisco Department of Recreation and Parks as "... *an oasis--a verdant, horticulturally diverse, and picturesque public space where city dwellers can relax and reconnect with the natural world.*" Replacing natural turf with artificial turf made of plastic and rubber tire crumb, installing stadium lighting that will illuminate the surrounding sky long after the sun has gone down, and significantly altering this area of the Park will irreparably alter the Park, harm the Park and surrounding environment, and threaten the health of humans, other animal life, and vegetation.

Following are my questions and comments regarding the review of environmental impacts in the DEIR. These comments focus on the following areas: Project Description; Plans and Policies; Land Use; Aesthetics; Transportation and Circulation; Hydrology and Water Quality; and Hazards and Hazardous Materials and Air Quality.

Case No. 2010.0016E

1

jeanbbarish@hotmail.com

DEIR_Letter Final_JB_12-12-11

CHAPTER II - PROJECT DESCRIPTION

Project Components (P. II-10)

According to Table II-1, page II-11, the fields are currently closed between 9 am - 3 pm Monday-Friday. According to Table II-4, one or two the fields will be used during these weekday hours. If fields are currently not used until 3 pm during the week, what will be the source of the anticipated increase?

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How much of the estimated increase in play time will be adult soccer teams, and how much will be youth teams?

According to Table II-2, the Project Site will increase from 9.4 to 11.2 acres, of which 0.4 acres is an increase in size of playing fields. What accounts for the remaining 1.4 acre increase, and how much of this increase in project size will be paved?

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CHAPTER III - PLANS AND POLICES

III. PLANS AND POLICIES

III-1: CEQA directs that a discussion of inconsistencies between applicable general plans and regional plans be included. Among others, the project was reviewed under the *Golden Gate Master Plan*, which states, in part:

- "The major design feature of Golden Gate Park and the framework within which all park activities occur is its pastoral and sylvan landscape. The integrity of the pastoral and sylvan landscape must be maintained and remain unaltered." (p. 3-9)
- "New special use facilities such as museums, recreation centers, and stadiums that are not essential to the mission of Golden Gate Park should not be sited in the park." (p. 3-16)
- "Park lighting should not detract visually or physically from the character of the park." (p. 3-21)
- "The demands for recreation need to be balanced with the objectives of preserving the original intent and purpose of the park as a 'sylvan and pastoral' retreat." (p. 6-1)
- "Lighting is for safety purposes and is not intended to increase night use." (p. 9-5)

There is little doubt that the proposed project is inconsistent with these and many other requirements of the Golden Gate Park Master Plan. This project shows no regard for the intended use of the western portion of Golden Gate Park as described in the Master Plan. Artificial turf, sports lighting, stadium seating, and more concrete have no place in this part of Golden Gate Park. Describing artificial turf fields and 60 foot high sports lighting as being consistent with the sylvan and pastoral nature of the park is laughable. And the sports lights will unquestionably distract from the character of the park. These are just two of the many examples that have been presented that demonstrate that the project flies in the face of the Golden Gate Park Master Plan. The project's obvious conflict with the Master Plan must be considered in this environmental review, and should be adequate grounds for rejection of the project as currently conceived.

03

CHAPTER IV - ENVIRONMENTAL SETTING & IMPACTS

IV.A. Land Use

According to the DEIR, the proposed project would not result in a substantial change in the character of the vicinity, and impacts to land use were less than significant. Since the proposed project will significantly increase the number of people traveling to/from and using this area of the park, since night lighting 365 days a year will alter the appearance of this area of the park, since the historic resource of this area of the park will be significantly altered, and since the project will significantly alter the appearance of the park, please explain why the DEIR concludes that impacts to land use are less than significant.

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IV.B. Aesthetics

Despite significant alterations to the appearance of the Park, the DEIR concludes that these changes do not significantly impact the aesthetics of the project environment. There are several reasons why this conclusion is incorrect and must be reexamined.

1) The DEIR's conclusions are based on the subjective determinations of consultants engaged by the Department of Recreation and Parks, the project sponsors. There is a strong likelihood that these consultants are biased, and given the significance of this project, their opinions are not sufficient. The only valid and meaningful determination of the project's impact on the aesthetics of the site is empirical evidence based on rigorous, objective research. This research should be conducted by an experienced, independent research organization. It should include an adequate number of randomly selected subjects that represent the population affected by changes to the site, it should use a questionnaire or other survey technique that will elicit valid and reliable responses, and in all other ways it should be conducted using standardized, generally accepted scientific methodology.

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2) The DEIR states that the evening photographic analysis of the proposed project to Crocker Amazon is an "approximate" example of what the project site would look like in the evening. Since comparison with Crocker Amazon is not valid, additional research is needed to determine the effect of lighting at the project site. This is especially important when considering evening views, since the western side of San Francisco has much more fog than the eastern side of the City, a difference that can significantly affect light transmission and reflectance. Additionally, it is not clear whether Crocker Amazon has the same amount of lighting, as measure by the number of lights and the amount of lights, in lumens. Clarification of this is requested.

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3) The following four additional views of the project should be included: a view from the Ocean Beach due west of the project looking east toward the project both during the day and after dark, and a view from the Cliff House looking toward the project both during the day and in the evening.

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IV.D. Transportation and Circulation

Travel Demand Analysis

The travel demand analysis was based on the assumption that the maximum number of spectators would be 5 per field on weekdays, and 36 per field on weekends. Yet the stadium seating that is planned will seat 1,046 spectators. It would appear, therefore, that the travel demand analysis should have been based on a maximum of 1,046 spectators. Incorrect assumptions lead to incorrect conclusions. It would appear, therefore, that the Impact Analyses are also incorrect.

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IV.G. Hydrology and Water Quality

The discussion in the DEIR of the possible release of toxins and other harmful substances leached from synthetic fields raises a number of general issues, including the following:

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- There is no discussion of harmful phthalates and other organic compounds found in synthetic turf, many of which are listed on California's Proposition 65 list as possible carcinogens or endocrine disrupters.
- The long-term environmental impacts of the release of harmful and toxic substances from synthetic turf into water runoff and groundwater are not fully explored.
- The impact of a man-made or natural disaster that might increase the release of harmful or toxic materials into the environment needs to be considered.
- Most of the research discussed in this section was not done in the field, but in the laboratory. That kind of research is less valid.

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In addition to these general concerns, please address the following:

Please identify all substances that have been found in artificial turf and tire crumb infill, including but not limited to metals, phthalates, carbon black, and other substances that are known to be or are believed to be harmful to human health and the environment. In what amounts are these substances released from artificial turf and tire crumb into water runoff and ground water per year and during the life of the synturf?

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The DEIR stated that the San Francisco Synthetic Playfields Task Force (the "Task Force") did not find independent studies that specifically addressed the effect of synturf on the ecosystem. Please review Dworsky, C., et al., "Runoff Water from Grass and Artificial Turf Soccer Fields: Which Is Better for the Soccer Player, the City and the Environment?"

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The DEIR states that the synthetic turf will meet standards set by the SF RPD Synthetic Playfields Task Force. What other organizations have standards and how do the Synthetic Playfields Task Force standards compare to those of other organizations and jurisdictions?

Please assess the risk of a natural or man-made disaster causing damage to the proposed lining and drainage system designed to capture runoff and leachate from the fields, and discuss all possible environmental impacts should such an event occur. Please discuss plans to minimize these impacts.

Please assess the risk of a natural or man-made disaster causing flooding of the soccer fields, and discuss all possible environmental impacts should such an event occur. Please discuss plans to minimize these impacts.

The proposed project would remove approximately 10 acres of permeable land from Golden Gate Park through which water penetrates to the underlying aquifer. Please discuss the consequences of removing this land as a water source for the aquifer.

The standards developed by the Task Force specify maximum levels for soluble chromium, lead, and zinc. Table IV.G-3 identifies many additional metals that were monitored and identified copper, iron, and manganese as exceeding MCL. Explain why these metals as well as all other metals found in rubber tire crumb are not included in the Task Force standards.

According to Table IV.G-3 the zinc standard for SBR infill exceeds the drinking water MCL. The DEIR states: "...the Waste Extraction Test...is not necessarily representative of the zinc concentration that could dissolve into water as a result of stormwater runoff or leachate through the field." Absent a representative test, therefore, explain the rationale for the standard established by the Task Force for allowable zinc levels in SBR infill.

Impact Analysis HY-1 states: "...there is a substantial amount of research...that suggest[s] the runoff from the fields would not cause adverse water quality effects..." Yet Table IV.G-1 states, in part: "...there is a potential for synthetic turf to leach metals.."; and, "Total iron and manganese concentrations in stormwater samples from two synthetic turf installations exceeded secondary drinking water standards." Please reconcile this inconsistency.

Impact Analysis HY-1 discusses capturing all runoff and leachate from the fields, which would then connect to the SF sewer system. Alternatively, if the runoff and leachate quality are acceptable, then drainage into the groundwater basin would be allowed, provided the project complied with the SF Stormwater Management Ordinance. Please clarify if these are two separate constructions projects, and, if so, what would be the environmental and economic impact of initially building a drainage system, and subsequently constructing a compliant Stormwater Management System.

Impact Analysis HY-3 states that in the worst case there would be increased volume of overflow stormwater discharge. What would be the increase in the amount of heavy metals and other toxins from all components of artificial turf due to this increased volume of stormwater overflow discharge?

According to the DEIR, Cumulative Impacts C-HY are potentially significant, however they can be successfully mitigated. This assumes that the underlying liner and drainage system will work effectively and is not vulnerable to damage from an event such as an

earthquake or tsunami, and that there will not be a significant impact if the fields are flooded. Please evaluate the proposed mitigations in view of the risk of such events.

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cont.

IV.H. Hazards and Hazardous Materials and Air Quality

As the DEIR readily admits, there has been a great deal of public concern regarding health issues related to the use of synthetic turf with tire crumb infill. There is a wealth of information regarding these potential health hazards from all over the world, many of which conclude that the product raises significant health and environmental concerns. Unfortunately, the DEIR failed to consider many studies and papers that discuss these issues, and skewed the studies that it did consider. Some of these issues are discussed in section IV.G - Hydrology, above.

The studies that are referred to in this section of the DEIR state there is a need for additional information and research regarding the risks of artificial turf before it can be considered safe enough to use on athletic fields. These safety considerations are especially important since the proposed fields will be used by young children, who are known to be more vulnerable to environmental toxins.

In addition to concerns discussed above about the impact of artificial turf with tire crumb on hydrology and water quality, there are many other issues that must be considered when reviewing the environmental safety of artificial turf. These include:

- The effect of chemicals and particulate matter in tire crumb, including toxic metals, volatile organic carbons, phthalates, carbon black, allergens, other carcinogens and endocrine disrupters, that can be released into the air and water;
- The effect of chemicals and particulate matter in tire crumb, including toxic metals, volatile organic carbons, phthalates, carbon black, allergens, other carcinogens and endocrine disrupters, that can enter the body through ingestion, inhalation, skin contact, eye contact, and the like;
- The risk of exposure to MRSA that breeds on artificial turf;
- The risk of certain injuries such as ACL injury and "turf toe";
- The impact of synthetic turf on global warming;
- The effect of tire crumb sticking to clothes, skin, shoes, and the like, and migrating beyond the sports fields;
- The tendency for artificial turf to becoming dangerously overheated in warm and/or sunny weather;
- The fact that artificial turf with tire crumb infill is flammable;
- The safe disposal of artificial turf;
- Maintenance of artificial turf, including the use of detergents, cleansers, and the like.

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None of these issues were thoroughly researched in the DEIR. Only a few studies were cited, each of which looked at only one of the many issues that must be considered. None of the research considered the long-term exposure to artificial turf, nor were the cumulative effects considered.

Following are comments on studies cited in the DEIR:

2007 OEHHA Study

The results of this study are not conclusive. This study estimated a one-time ingestion of tire crumb using a gastric simulation device. This is merely a simulation and should not be basis for any conclusion regarding the health impact of long-term exposure to tire crumb under in-use conditions. The report states: "However... we have not calculated the increased cancer risk for other than a one-time ingestion." Additionally, this study evaluated health risks based on wipe sampling. Results showed a slight increased cancer risk from chrysene, a known carcinogen.

Synthetic Playfields Task Force

The task force recommendation not to use zinc, when feasible, is unacceptable. Elevated levels of zinc can be toxic. According to Table IV.H-2 artificial turf leachate has up to 250mg/L of zinc, whereas the California drinking water standard is 5.0mg/L. Also, the study group "recommended further study evaluate whether recycled tire infill is a pollution source and if off-gassing from these materials could result in adverse health effects..." And there are no specific plans for how these fields will be recycled, despite the fact that the safe disposal of approximately 400 tons of debris per field must be properly recycled. Absent a careful recycling plan, it is not safe to install these fields.

2009 OEHHA Study

This study determined that the increased risk of cancer from off-gassing was above the *de minimus* level for five of the eight chemicals tested. Additionally, the study concluded that "further studies of the chemicals present above synthetic turf fields is warranted."

2010 California Department of Resources Recycling and Recovery Study

This study measured the release of VOCs four feet above the fields. Since many young, small children play on these fields, this is not a realistic test. The test only measured the presence of VOCs above three Bay Area fields. Further, these limited studies "did not consider certain variables that could affect the generation of VOCs and particulates at synthetic fields, including field age, method of processing the tire rubber, and the source of the tire stocks. (IV.H-11-12)

Connecticut Studies

This study measured the concentrations of VOCs and the leaching of chemicals in laboratory conditions and in stormwater runoff. Air samples at only four outdoor fields were taken. Benzothiazole was measured at an unacceptably high level in an indoor field. The study concluded that the cancer risks were above *de minimus* levels for cancer risk. The study had significant limitations, including that it did not study other

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routes of exposures, such as ingestion and contact; some chemicals of potential concern, such as natural rubber latex, were not included; the project had a potential for selection bias because participation was voluntary and self-selected; and, the sample size was small (4 outdoor fields and 1 indoor field).

Evaluation of San Francisco Synthetic Turf Installations

Infill samples were only analyzed for metals. Additionally, the cobalt and zinc levels exceeded the residential ESL. There is no indication of how many samples were taken or over what period of time. Additionally, there was no air sampling or sampling of water runoff or groundwater leachate.

In addition to the studies above there is a great deal of research the DEIR did not consider that states that synthetic turf fields with tire crumb infill poses a health hazard that should be considered. Many of these studies are at www.synturf.org. Additionally, the non-profit organization Environment and Human Health, Inc. published a survey of research on the safety of artificial turf called Artificial Turf. Their conclusion: *There is enough information now concerning the potential health effects from chemicals emanating from rubber tire crumbs to place a moratorium on installing any new fields or playgrounds that use ground-up rubber tires until additional research is undertaken.*

Most recently, and perhaps most significantly, the city of Piedmont, CA, in the East Bay published a DEIR reviewing environmental impacts of a proposed artificial turf soccer field complex in Moraga Canyon. (*Public Review Draft Environmental Impact Report, Moraga Canyon Sports Fields Project, Piedmont, CA.* http://www.ci.piedmont.ca.us/recreation/docs/deir/ch_5.pdf) Following their comprehensive review of the research, the DEIR concluded that: *...the installation of synthetic turf field surfaces...has the potential to expose users and the environment to product constituents (e.g., heavy metals, polyaromatic hydrocarbons, volatile organic compounds, polychlorinated biphenols) that may have human and environmental health implications. Due to the lack of final consensus in the scientific community regarding the safety of synthetic turf, the implementation of the mitigation measures identified in Section 4.5 of this EIR would minimize the potential risk from the use of synthetic turf fields, but not to a less than significant level. **The installation of synthetic turf would result in a significant and unavoidable impact.** (p. 351)*

Precautionary Principle

On June 30, 2008, City Ordinance 113-08 officially adopted San Francisco's Environmental Code, which is guided by the Precautionary Principle, as follows:

SEC. 101. THE SAN FRANCISCO PRECAUTIONARY PRINCIPLEBased on the best available science, the Precautionary Principle requires the selection of the alternative that presents the least potential threat to human health and the City's natural systems... Simply put, the Precautionary Principle means "Safety First." More precisely, it stands for the proposition that when an activity raises threats of harm to human health or the environment, precautionary measures should be taken even if some

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cont.

cause and effect relationships are not fully established scientifically. In this context the proponent of an activity, rather than the public, should bear the burden of proof.

Conclusion: Synthetic Turf with Tire Crumb Infill Has Significant Environmental Impacts that Cannot be Mitigated

When viewed in light of the Precautionary Principle, the hazardous impacts of the proposed project are clearly significant and cannot be mitigated. There is simply too much risk to human health to take a chance on an entire population of users. And, in accordance with the Precautionary Principle, when there is too much risk a project should not proceed. Tire crumb contains many compounds, including toxic metals, volatile organic carbons, phthalates, carbon black, allergens, and endocrine disrupters, that are carcinogenic or otherwise toxic. These toxins appear in water runoff, leachate and in the air. Rubber tire crumb gets attached to clothing, shoes, and skin. It should also be pointed out that the California EPA has very strict regulations on the disposal of rubber tires because they are toxic, yet does not regulate the disposal of rubber tire crumb. It is as though by grinding up the toxic material in tires and spreading it on artificial grass it becomes non-toxic.

Finally, and perhaps most important, the DEIR does not have any studies on the long-term, cumulative impacts of continuous exposure to artificial turf with rubber tire infill. Studying the short-term impacts of isolated components of artificial turf does not answer the critical question: *What are the health and environmental impacts of long-term exposure to all of the components in artificial turf with tire crumb infill?* Short-term studies of individual components does not provide valid and reliable data upon which to base a decision that will impact the health of users of these fields, especially young and vulnerable children, for years to come. Absent these studies and in view of the Precautionary Principle, the Environmental Impact Report should conclude that the Hazards and Hazardous Materials and Air Quality impacts of the project are significant and cannot be mitigated.

23
cont.

Additionally, in a letter sent to the Planning Department on March 4, 2011, I requested that the DEIR answer the following questions. The DEIR failed to respond to many of these requests, which are repeated herein:

Composition of Artificial Turf

- What is the amount, by weight, of artificial turf that will be used in the construction of the Beach Chalet athletic fields?
- What are all the chemical compounds, including but not limited to epoxies and adhesives, that will be used in the construction of the artificial turf fields?
- What are the amounts of the chemical compounds identified above that will be used in the construction of the artificial turf fields?

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Composition of Tire Crumb Infill

- What is the amount, by weight, of tire crumb infill that will be used in the construction of the artificial turf fields?

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- How many tires will be used to generate the tire crumb infill that will be used in the construction of the artificial turf fields?
- What is the source of the tires that will be used in the construction of the artificial turf fields?
- How often will tire crumb infill need to be replaced?

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cont.

Health and Environmental Hazards of Artificial Turf and Tire Crumb Infill

The following questions address health and environmental safety issues of artificial turf and tire crumb infill. Please identify all sources of information that you have used to answer these questions and reach your conclusions.

Proposition 65

The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65) requires the publication of a list once per year of chemicals known to the State to cause cancer or reproductive toxicity. Please identify all chemicals contained in artificial turf and tire crumb infill that are on the current list of chemicals listed under Proposition 65.

Volatile Organic Compounds

Volatile organic compounds (VOCs) are a class of carbon-based chemicals that vaporize at room temperature, releasing gases into the air. Human exposure routes of VOC's include inhalation, skin absorption and ingestion, which can easily occur during normal play activities. VOCs include but are not limited to compounds listed under Proposition 65. For this EIR please answer the following questions. Unless otherwise specified, all questions refer to effects under real-life/in-use conditions of the product:

- Please identify all the VOCs that are in artificial turf and tire crumb infill.
 - What is the amount of off-gassing of these VOCs during the lifetime of the artificial turf and tire crumb infill?
 - Please identify all VOCs in artificial turf and crumb rubber that have health effects, including but not limited to allergic effects, thyroid and other endocrine effect, neurological effects, skin, eye and/or respiratory irritation, and increased risk of cancer?
 - What is the amount of exposure to humans and animal life from inhalation, dermal contact, ingestion, and the like, of these VOCs during the lifetime of the fields?
 - What are all the risks to human health of exposure to these VOCs to those playing on the fields, spectators, and others not on the fields, including but not limited to the risk of allergic reactions, thyroid and other endocrine effects, neurological effects, skin, eye and/or respiratory irritation, and increased risk of cancer, during the lifetime of the fields? Please indicate if the risks vary by age and/or gender.
 - What are all the risks of exposure to these VOCs to human health, including but not limited to the risk of allergic reactions, thyroid and other endocrine effects, neurological effects, skin, eye and/or respiratory irritation, and increased risk of cancer, from artificial turf and tire crumb infill due to migration of artificial turf and/or tire crumb from the primary playing site to other sites during the lifetime of the fields? Please indicate if the risks vary by age and/or gender.
 - What are all the risks of exposure to these VOCs to plant and animal life during the lifetime of the fields?

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- What is the effect of VOCs on the odor of the surrounding environment?

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cont.

Toxic Metals

Toxic metals have been defined as metals that are not essential minerals, are in the wrong form, and/or have no known biological role. They are sometimes referred to as heavy metals. Toxic metals are known to bioaccumulate in the body and in the food chain. A common characteristic of toxic metals is the chronic nature of their toxicity. Toxic metals include, but are not limited to lead, cadmium, arsenic, and zinc. Unless otherwise specified, all questions refer to effects under real-life/in-use conditions of artificial turf with tire crumb infill:

- Please identify all the toxic metals that have been found in artificial turf and tire crumb infill.
- What toxic metals and in what amounts are these toxic metals released from artificial turf and tire crumb into ground water during the life of the product?
- What toxic metals and in what amounts will these toxic metals run off into San Francisco Bay, the Pacific Ocean, and the surrounding environment through storm drains and surface runoff during the lifetime of the fields?
- What toxic metals and in what amounts will these toxic metals migrate during the life of the product from the artificial turf and tire crumb infill as the result of tracking on shoes and clothes, leaching, wind transport, and the like?
- What is the amount of human and environmental exposure of these toxic metals, due either to direct exposure to artificial turf and tire crumb infill and/or due to migration of product due to tracking on shoes and clothes, leaching, wind transport, and the like?
- What are all the risks of exposure to these toxic metals to those playing on the fields, spectators, and others not playing on the fields, including but not limited to the risk of allergic reactions, thyroid and other endocrine effects, neurological effects, skin, eye and/or respiratory irritation, and increased risk of cancer, during the lifetime of the fields? Please indicate if the risks vary by age and/or gender.
- What are all the risks of exposure to these toxic metals including but not limited to the risk of allergic reactions, thyroid and other endocrine effects, neurological effects, skin, eye and/or respiratory irritation, and increased risk of cancer, due to migration of artificial turf and/or tire crumb from the primary playing site to other sites during the lifetime of the fields? Please indicate if the risks vary by age and/or gender.
- What are all the risks of exposure to toxic metals to plant and animal life in artificial turf and tire crumb infill during the lifetime of the fields?

29

Phthalates, Latex and Other Substances

In addition to VOC's and heavy metals, phthalates, latex and other substances, some of which may be listed under Proposition 65, are considered toxic. These may also be present in artificial turf and tire crumb infill.

- In what amounts will these other substances migrate during the life of the product from the artificial turf and tire crumb infill as the result of tracking on shoes and clothes, leaching, wind transport, and the like?

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- What is the amount of exposure to humans and wildlife from inhalation, dermal contact, ingestion, and the like, of these other substances during the life of the product?
- What is the amount of human and environmental exposure to these substances during the lifetime of the product, due either to direct exposure to artificial turf and tire crumb infill and/or due to migration of product due to tracking on shoes and clothes, leaching, wind transport, and the like?
- What are all the risks of exposure to these substances to those playing on the fields, spectators, and others not playing on the fields, including but not limited to the risk of allergic reactions, thyroid and other endocrine effects, neurological effects, skin, eye and/or respiratory irritation, and increased risk of cancer, during the lifetime of the fields? Please indicate if the risks vary by age and/or gender.
- What are all the risks of exposure to these substances to human health, including but not limited to the risk of allergic reactions, thyroid and other endocrine effects, neurological effects, skin, eye and/or respiratory irritation, and increased risk of cancer, due to migration of artificial turf and/or tire crumb from the primary playing site to other sites during the lifetime of the fields? Please indicate if the risks vary by age and/or gender.
- What are all the risks to plant and animal life of exposure to toxic metals in artificial turf and tire crumb infill during the life of the product?

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cont.

Cleaners, Disinfectants and Other Agents Used on Artificial Turf

Agents such as cleaning solutions, disinfectants, anti-static agents, flame retardants, and the like are used on artificial turf. An artificial turf field, for example, must be disinfected regularly to remove body fluid spills as well as bacteria that cannot be naturally removed through the action of rainfall and natural processes found in the soil biology.

- Please name all the agents, such as cleaners, disinfectants, anti-static agents, flame retardants, and the like, that will be used to treat the artificial turf.
- Please identify all the ingredients of each of these agents, and indicate which ones are listed under Proposition 65.
- How frequently and in what amounts will these agents be used on the artificial turf?
- What is the amount of human and environmental exposure to these substances during the lifetime of the product, due either to direct exposure to artificial turf and tire crumb infill and/or due to migration of product due to tracking on shoes and clothes, leaching, wind transport, and the like?
- What are all the risks of exposure to these substances to those playing on the fields, spectators, and others not playing on the fields, including but not limited to the risk of allergic reactions, thyroid and other endocrine effects, neurological effects, skin, eye and/or respiratory irritation, and increased risk of cancer, during the lifetime of the fields? Please indicate if the risks vary by age and/or gender.
- What are all the risks of exposure to these substances to human health, including but not limited to the risk of allergic reactions, thyroid and other endocrine effects, neurological effects, skin, eye and/or respiratory irritation, and increased risk of cancer, due to migration of artificial turf and/or tire crumb from the primary playing site to other sites during the lifetime of the fields? Please indicate if the risks vary by age and/or gender.

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- What are all the risks to plant and animal life of exposure to toxic metals in artificial turf and tire crumb infill during the lifetime of the fields?
- Is artificial turf with tire crumb infill flammable? If so, under what conditions and what measures will be taken to minimize the risk that the turf will ignite?

32

Risk of Injury

Experts have expressed concern that certain types of injuries occur more on artificial turf often due to its composition and inflexibility.

- Please compare the risk of all injuries on artificial turf to the risk of injury on natural grass. Please indicate if the incidence varies by age and/or gender.
- Please compare the incidence of the following injuries on artificial turf to their incidence on natural turf: first metatarsophalangeal joint sprain ("turf toe"); anterior cruciate ligament injuries ("ACL"); foot lock; all other musculoskeletal injuries, including but not limited to sprains, fractures, and the like; turf burn; head injuries, including but not limited to concussion and skull fractures. Please indicate if the incidence varies by age and/or gender.

33

Risk of Infection

Due to the combination of warmth and moisture, artificial turf is a breeding ground for harmful bacteria, including the life-threatening Methicillin-resistant *Staph aureus* (MRSA).

- Please compare levels of harmful bacteria, including MRSA, found on artificial turf compared to natural grass during the lifetime of the product.
- Please compare the incidence of bacterial infections, including MRSA infections, related to play on artificial turf compared to playing on natural grass, during the lifetime of the product.

Heat Island Effects

One of the adverse environmental and health impacts of artificial turf fields is the "heat island" effect. This means two things: the synthetic surface undesirably absorbs, retains and emanates heat at temperatures and rates that are harmful to the environment, and the turf in its life-cycle is responsible for generation of carbon dioxide and other greenhouse gases that contribute to global warming.

34

- Please quantify the effect that replacing the natural grass in this project with artificial turf will have on oxygen production.
- Please quantify the effect that replacing the natural grass in this project with artificial turf will have on sequestration of carbon dioxide.
- Should the artificial turf fields become too hot to be comfortable or safe, what steps will be taken to mitigate this problem?

Maintenance and Replacement of Artificial Turf

- How long is the artificial turf expected to last before it must be replaced?
- There have been claims that artificial turf conserves water. Yet water must be used to wash and cool artificial turf. Please compare the amount of water used to clean

35

and maintain artificial turf to the amount of water needed to maintain a natural grass field in Golden Gate Park.

- Artificial turf and tire crumb infill are not biodegradable. Please detail the manner of reuse, recycling and/or disposal of artificial turf and tire crumb infill.

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cont.
↓ 36

Thank you for considering the foregoing issues. I would also like to receive a printed copy of the Comments and Responses by mail to the letterhead address.

Sincerely,

Jean B Barish, Esq.

cc: Mr. Don Lewis, Planning Department



Bill Wycko/CTYPLN/SFGOV
11/29/2011 03:09 PM

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

cc

bcc

Subject Fw: A tour of the Beach Chalet Soccer fields

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 11/29/2011 03:08 PM -----



"Eddie Bartley"
<eddie@naturetrip.com>
11/29/2011 11:16 AM

To <bill.wycko@sfgov.org>

cc

Subject A tour of the Beach Chalet Soccer fields

Mr. Bill Wycko

Environmental Review Officer

Beach Chalet Fields Renovation

San Francisco Planning Department

1650 Mission Street, Suite 400

San Francisco, CA 94103

Last Friday I, along with two colleagues, met with reporter Lisa Carmack of the Bay Guardian to tour and discuss the artificial turf issue at the Beach Chalet. During our 30 minute walk I identified 27 species of birds by sight and sound, well over 100 individual birds who were using the grass soccer fields and immediate surroundings to feed on a variety of vegetation, insects. Also included were a bonded pair of adult Red-shouldered Hawks who were hunting Botta's Pocket Gophers along the perimeter. That was only a 30 minute survey on a drizzly day in November. Over the course of a year many more species and thousands of birds can be documented. As I'm sure you are aware birds in general, raptors and owls in particular, are the most effective natural pest control agents there are.

01

Having read the Draft Environmental Impact Report commissioned by the San Francisco Recreation AND Parks Department I find it grossly underestimates and is negligent in addressing the impacts on biological resources within the project area in many ways:

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1. I specifically challenge the species inventory of the two wildlife survey's described in Section IV.F-5 and IV.F-6 of the survey. As a participant of many nest surveys both professional and as a volunteer, while I recognize that birds nests are by design very

difficult to detect, a finding of no active nests in the project impact area is almost impossible to believe. The paltry description of avian species identified strongly suggests that the wildlife survey is woefully inadequate for this area. Wildlife moves around, lies in hiding while resting and generally avoids activity when humans are and an inattentive biologist will miss much. Also a single nest survey in May will necessarily miss many species who nest before and after that month.

02
cont.

2. Regardless of the survey team's inability to find active nests however, the planned removal of over seven acres of grassland and woodland habitat will be a death sentence for the wildlife that use this area today. These animals can not, as the report implies, simply move to another area. Other areas are already in use by other animals surviving in remaining open space areas. Other areas are at their biological limits already and are fully subscribed. This is the simple biological fact that the producers of the Draft EIR appear to be in denial of. This particular pair of Red-shouldered Hawks (that one group I organize, the SF Bay Area Raptor Nest Study has been monitoring since 2007) is a long established pair that uses this area as their primary diner. If this verdant habitat is plasticized and lit up these birds will try to move on but will only run into another territorial pair, conflict will ensue, the result being the removal of this biological resource along with an amount equal to all of the other wildlife that is now using this area including birds, mammals and insects.

03

3. Add on top of that the effective removal of the perimeter habitat that will be lit up until 10:00 PM most nights of the year. These areas can not be used for nocturnal animals that use it to feed or diurnal animals that need it to rest from the high demands of surviving in an near-urban environment. The large increase in traffic from humans will also have a major negative effect on these animals.

04

4. Then there is the significant avian casualties, especially of migrating neo-tropical songbirds and shorebirds (many who are seriously threatened as species) that will occur when these light fields cause disorientation during their epic bi-annual journeys. This is well documented science that the producers of the EIR fail to acknowledge.

05

In my professional opinion as an avian researcher and natural history educator the Draft EIR is negligent in addressing the extent of the significant Biological Resource environmental impacts. That the report is commissioned by the SF Recreation & Parks Department who has whole-heartedly endorsed the artificial turf project (without any environmental consideration) as a money maker and is only begrudgingly and at the threat of lawsuit commissioning the EIR in itself is ethically challenging.

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07

This project is a very bad idea for wildlife and people who use the parks as a place to commune with nature without even addressing the other huge environmental impacts including:

1. Toxic runoff from the plastic field into the local aquifer
2. The use of carcinogenic chemicals used to produce the artificial turf
3. The lack of an "end of life" plan
4. The massive 400 ton per cycle of toxic landfill waste

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5. The environmental and economic injustice to San Francisco citizens - \$8 - 11 MILLION that could go to programs throughout the money strapped parks department.

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6. The affront to the Golden Gate Park Charter

12

Sure, this area is not the native, now rare, California coastal dune habitat that was removed when settlers and then the park removed it to make way for what is there now. It is not the pristine wilderness it was and it is impractical to consider returning it to such. But it is a testament to the resourcefulness and resiliency of our remaining wildlife that many native species have adapted to what is available to them now. Unfortunately that will never be the case with artificial turf. Plastic fields are a barren, toxic wasteland as far as animals are concerned and these animals will go away, not to another place as is naively being suggested, but go away as in extirpated from this life forever or until the area is returned to a vegetative condition. If we subscribe to the myopic vision that only threatened or endangered species need be considered and protected, then uncommon and common species will become threatened and endangered. We only need look at the list of endangered species now to see that. Tell me again, what color green in San Francisco trying to be?

13

Thank you for accepting and considering my comments.

Eddie Bartley
San Francisco
www.naturetrip.com

From: Terry Baum <terryjoanbaum@gmail.com>
To: bill.wycko@sfgov.org
cc: don.lewis@sfgov.org

Date: Monday, December 12, 2011 03:45PM
Subject: Beach Chalet Soccer Fields Draft EIR

This is simply not an objective study. It is clear that the people who did the EIR intended from the beginning to conclude that the new soccer fields would cause no significant changes or problems.

How could any reasonable human being conclude that the aesthetic effect of the huge banks of lights for night time play was "insignificant"? That is ludicrous. One might conclude that the fields were a good idea anyhow. But this one judgment demonstrates that the intention of those doing the study was to end up making it easy to approve the soccer fields.

01

I point to the aesthetic issue as only one of many examples of such bias by the writers of the DEIR.

This is not a draft EIR. It's a draft Snow Job. The people of San Francisco and our beloved Golden Gate Park deserve better. It's back to the drawing boards, folks. This is in no way an acceptable DEIR.

Terry Joan Baum
 415 648-5244
 547 Douglass St.
 Resident of San Francisco since 1977.

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TAX THE RICH – DUH!
Terry Joan Baum
for
Mayor of San Francisco

Terry Joan Baum
www.terryjoanbaum.com



Linda Avery/CTYPLN/SFGOV

12/06/2011 03:38 PM

To Don Lewis/CTYPLN/SFGOV@SFGOV,
rsejohns@yahoo.com, Bill
Wycko/CTYPLN/SFGOV@SFGOV, Patricia

cc

bcc

Subject Fw: Please approve the environmental impact report for the
proposed Beach Chalet soccer 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

----- Forwarded by Linda Avery/CTYPLN/SFGOV on 12/06/2011 03:38 PM -----



"Belkora, Jeff"
<Jeff.Belkora@ucsf.edu>

12/06/2011 02:49 PM

To "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>
cc "linda.avery@sfgov.org" <linda.avery@sfgov.org>

Subject Please approve the environmental impact report for the
proposed Beach Chalet soccer fields

Dear President Olague and members of the Planning Commission,

I am a resident of the Outer Richmond. I have lived here since 2003. For those last 8 years I have also played soccer every weekend on city fields. My soccer group, a collection of dads from around the city, plays for fitness and camaraderie every Sunday morning. (We play at 7 am so as to avoid competing with other field uses at more peak times.)

From 2003 to around 2008, we played on the Beach Chalet fields mostly, using the Parks and Rec reservation system. We would consistently get rained out/locked out of the Beach Chalet fields from December to March each year. We would be lucky to play one weekend out of 4 during those winter months. Our group of about 60 players collectively suffered about a dozen serious ankle, knee, and other related injuries in the gopher holes of the Beach Chalet.

Around 2009, we began booking ourselves into the brand new "turf" fields at Crocker Amazon. Since then, we have experienced no field-related injuries whatsoever. Our fate improved when the "turf" fields opened up at Kimbell, which is a more central location for our group. At both Crocker and Kimbell, we witnessed first-hand how those previously blighted playgrounds were reborn as thriving hubs of

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sporting activity, in use at 100% capacity throughout the year.

The dads in our group are all sensitive to environmental concerns. There are undoubtedly some tradeoffs, and we respect the concerns of the people who oppose the new turf complex at the Beach Chalet. Personally, I agree that darkness and empty unused parkland can contribute to a better environment for birds and nature lovers. However, there are a few key arguments that sway me towards supporting turf fields at the Beach Chalet.

First, cities like San Francisco are, overall, incredibly environmentally friendly ways to house the human population of our planet. Our planet would be better off if we all concentrated ourselves into cities where we use resources efficiently for work and recreation. I personally see it as a pro-environmental strategy to improve San Francisco facilities and keep people from moving to the suburbs. This includes preserving the essential character of Golden Gate Park – but the acres of grass and trees can tolerate, it seems to me, a small amount of artificial turf that will be in almost constant use for the benefit of our city residents. We have found that the turf is incredibly fun to play on. While in hotter climates, the turf might get too hot for comfort, in San Francisco we can play comfortable on it year-round, including in a downpour (the turf drains instantaneously.)

Second, among the human population of the city, we are at high risk for health problems related to our sedentary habits. Opening up new recreational capacity will enormously improve the health of our residents. Our own group of 60 or so dads are experiencing tremendous health benefits from our weekly 90 minute soccer game. Most of us now run or exercise during the week to be more competitive on the weekends. Our social bonding also benefits the city. In addition to networking among ourselves for friendship and professional reasons, we donate a few thousand dollars each year to the department of parks and recreation to improve their facilities.

Thank you for considering this request that you approve the environmental impact report and allow work to proceed on renovating the Beach Chalet fields.

Jeff Belkora, PhD
Assistant Professor, Surgery and Health Policy
University of California, San Francisco
jeff.belkora@ucsf.edu
(650) 533 6965
Fax (415) 651 8574

01
cont.

From: Stephen Boskin <sboskin@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" <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 07:53AM
Subject: Support for the Beach Chalet Renovation Project

Hello Planning Commission,

My name is Steve Boskin, a resident of SF with 2 children. Thank you for having the DEIR meeting for public comment. Although I was there for a couple hours I did not have a chance to share my comments. Although I think we were all impressed with the two young adults who voiced their opinion, my 12 year old daughter could not attend as she is now on crutches because she played soccer on the field in question and tore her ACL which is now requiring surgery. It's the gopher holes that are the real problem. My daughter went down with no contact from another person. She got her foot caught in a hole. One person at the meeting referenced an article that researched injuries on grass vs. artificial turf. This article looked at consistent grass fields, not ones with many gopher holes in them.

My wife and I have chosen to raise our family here in SF. Because we could not get into the public schools close to our house, we chose a small private school affiliated with our church, Zion Lutheran on Anza. The school is very small with no yard and a small play ground as part of the parking lot. We understood we'd have to find other outlets for our children's athletic endeavors, which was fine as SF offers many sport programs including soccer, baseball, football ... however they offer these choices on fields that are simply dangerous. When my children I first saw some of the conditions of these fields and was shocked. I was just waiting for injuries to occur. Then I saw some of the fields being renovated with turf which has made a better experience for everyone, but there needs to be more fields like this. The Beach Chalet would be huge. If you want families like ours to continue to stay in SF, these options need to be available. We wouldn't sign our kids up in leagues outside of the city and drive continually. I know many families who have moved out for this reason specifically.

Thank you for your time,
Steve Boskin

01

I-Bowman

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

Date: Monday, December 12, 2011 01:26PM
Subject: Fw: OPPOSE BEACH CHALET ATHLETIC FIELDS RENOVATION PLAN / SUPPORT MORE & BETTER SOCCER FIELDS

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 12/12/2011 01:27 PM -----

Arnita Bowman
<arnitabowman@hotmail.com>

12/12/2011 01:18 PM

To<bill.wycko@sfgov.org>
 cc<sfoceanedge@earthlink.net>
 SubjectOPPOSE BEACH CHALET
 ATHLETIC FIELDS
 RENOVATION PLAN /
 SUPPORT MORE & BETTER
 SOCCER FIELDS

I oppose the proposed expansion and modernization of the Beach Chalet Athletic Field.

The Beach Chalet fields need to be fixed up, maintained, and gopher hole prevention implemented. However, completely changing the character of the western end of Golden Gate Park because of poor maintenance does not make sense. In addition, I am concerned about the impact of the lights on the Ocean Edge.

I fully support youth and adult soccer therefore suggest the budget for the proposed Beach Chalet project be used to fix up the Beach Chalet fields with real grass in keeping with the master plan, and then use the rest of the money to fix up other playing fields in San Francisco parks and schools, and/or create new fields or a complex. For example, why not explore creating a major soccer complex at Sharp Park in the rifle range area. Perhaps, a joint project with Pacifica and/or the County of San Mateo. Note that for many people in SF getting to Sharp Park would be easier than getting to Ocean Beach and would free up local fields for more ad hoc neighborhood play.

Any of these options is a win-win solution that protects the character of the parklands and gives kids more nearby places to play while keeping a terrific grass field in a beautiful historic setting: Golden Gate Park.

Arnita Bowman
 San Bruno, CA



Bill Wycko/CTYPLN/SFGOV
12/05/2011 11:17 AM

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

cc

bcc

Subject Fw: G.G.P. Soccer Fields

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 12/05/2011 11:17 AM -----



"Michael Brant"
<michaelb@lanset.com>
12/02/2011 10:37 PM

To <bill.wycko@sfgov.org>

cc

Subject G.G.P. Soccer Fields

The Planning Commission has a difficult decision before it.
There clearly is a shortage of usable soccer fields in the City.
But that is not a reason to permanently alter the historic character of the
Park, and ignore the clear intent of the Master Plan.
The E.I.R. is obviously flawed and inadequate in its minimizing of the huge
construction's effects on wildlife, chemical pollution, traffic, and light pollution
for the whole western Sunset district.
Please reject this radical, destructive proposal.

01

02

Thank you.

Michael Brant
1739 45th Avenue
San Francisco, CA 94122



Bill Wycko/CTYPLN/SFGOV
12/05/2011 11:17 AM

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

cc

bcc

Subject Fw: Beach Chalet Soccer Fields in Golden Gate Park

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 12/05/2011 11:18 AM -----



Stacey Bridges
<bridgesofgrace@gmail.com>
12/02/2011 09:02 PM

To bill.wycko@sfgov.org

cc

Subject Beach Chalet Soccer Fields in Golden Gate Park

Dear Mr. Wycko:

I pray you have read what has been written of the heart-breaking consequences of putting artificial and wholly out-of-place commercial soccer fields within our beloved Golden Gate Park. And, I pray that you will do everything within your power to prevent this travesty from happening!

As a native Californian and a lover of Golden Gate Park, I implore you to uphold the original intent of majestic Golden Gate Park:

"The project seems to belie the original intent of Golden Gate Park as a uniquely wild setting. The Master Plan for Golden Gate Park, drafted in 1995, emphasizes environmental stewardship and maintaining the park in a natural, multi-use way. Among its provisions are "major meadows and lawns should be adaptable to host a wide variety of activities, rather than designed for a specific use.""

01

"But the Recreation and Park Department (RPD) and sports advocates are pushing a plan to install seven acres of synthetic turf fields, complete with 60-foot, 150,000-watt lighting that will shine until 10 p.m. year-round."

And:

"What are the concerns with this project?"

- Removal of 9 acres of natural grass which provides habitat to birds, butterflies and other wildlife and there is no mitigation proposed.
- Installation of 10-60' towers with stadium lighting that will remain on until 10:00pm every night. Artificial lighting has been shown to draw birds off course during migration. This site is within the Pacific Flyway, in Golden Gate Park and 1000 feet from Ocean Beach.
- The lighting will negatively impact nesting birds and other species that depend on the

02

03

- area surrounding the soccer fields as habitat.
- There is no recycling of the artificial turf plastic and tire crumb rubber, in 8-10 years 400 tons of debris will go to the landfill.
- It is much less expensive and more environmentally sustainable for the City to restore the natural grass fields.
- This is a onetime gift to the City. When the artificial turf fields need to be replaced in 8-10 years where will the millions of dollars come from?"

↑ 03
cont.
| 04
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As well as:

The SF Recreation and Parks Dept. is proposing to replace 9 acres of open, naturally-growing grass in Golden Gate Park with synthetic turf and to install several 60-foot tall lights that will illuminate the western end of Golden Gate Park for the first time. This project will remove important wildlife habitat, increase disturbances to neighbors and wildlife, and violate the Golden Gate Park Master Plan.

| 07

Please oppose this project!

Sincerely,

Stacey Bridges



Bill Wycko/CTYPLN/SFGOV
12/08/2011 09:48 AM

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

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 12/08/2011 09:48 AM -----



garybrowd@comcast.net
12/07/2011 08:47 PM

To bill wycko <bill.wycko@sfgov.org>
cc sfoceanedge@earthlink.net
Subject Beach Chalet soccer field Draft EIR

Mr. Bill Wycko
Environmental Review Officer
San Francisco Planning Dept.

Dear Mr. Wycko:

I'm writing in strong opposition to the conclusions taken in the DEIR regarding the impact of this proposed project on Golden Gate Park, and the Ocean Beach environs. I am a long time resident of the Inner Sunset and am very fortunate to have the Park at my doorstep. The Park is the focal point for the pleasures of my life, as it is for so many San Franciscans, and untold numbers of visitors from local areas, and beyond. Therefore the preservation of, and respect for the heritage of the Park are of great importance to me. This project would violate numerous provisions in the Park's Master Plan which calls for the western end to remain undeveloped and wild. The stadium lighting on 60ft towers would have a profound impact on the ambiance of the dark, windy, fog shrouded edge of our Park and the beach beyond. In the daytime the towers themselves would be an ugly eyesore destroying the symmetry of the view of the windmills and the unbroken green stretch that ties them together. What an insult to the magnificently restored Murphy Windmill these light towers would be! Every weekend I ride my bike from the beginning of the Park at Arguello to Ocean Beach.

01

02

On this intensely pleasurable ride I find myself constantly reminded of how beautiful the Park is and how important it is to me and so many. When I get to Ocean Beach I leisurely ride along the Promenade and gaze across at the unbroken green facade that forms the edge of the Park. Since I became aware of the project every time I'm down there I find myself shuddering to think how appalling, and galling, it would be to see light towers projecting above that facade.....I make use of the Park in another way. I regularly play golf at the Golden Gate Park golf course, a treasure if ever there was one. From the final hole, the 9th, players look west down the hill to the ocean. Bruce Olsen, the course operator, fears that the towers would be visible and ruin the unspoiled natural view we have always had. I would be distressed and saddened if that view were marred.

02
cont.

I attended the Planning Commission meeting on Dec. 1 and heard speaker after speaker present lucid, compelling arguments refuting the DEIR's conclusions. They addressed the destruction of wildlife habitat, toxicity of the material used in the artificial turf, the outrageous cost, and the need for periodic replacement, the cutting down of more than 50 trees, the congestion and parking conflicts with Dutch Windmill visitors and events, and the entire issue of light pollution. The people who presented these arguments have worked long and hard to study these issues and to gather their evidence. Their voices deserve to be heard! The fact that there are several alternatives to the stadium idea makes it a lot easier to compromise. The soccer people say all or nothing, the opposition says restore and maintain the natural grass field and use the remaining \$10 million to improve and develop other parks. The report should be rejected and steps taken to pursue one of the alternatives. Surely, reasonable people can come up with a plan that benefits youth soccer, as well as all of us, a plan that does not forget the history, the heritage and the current and future enjoyment of this western edge of our city.

03

04

Sincerely,

Gary M. Browd

145 Lincoln Way
San Francisco, CA 94122



Bill Wycko/CTYPLN/SFGOV
11/30/2011 06:50 PM

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

Subject Fw: I am against the Beach Chalet Athletic Fields project

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 11/30/2011 06:50 PM -----



JBrown <jezcab@yahoo.com>

11/30/2011 06:49 PM

Please respond to
JBrown <jezcab@yahoo.com>

To "bill.wycko@sfgov.org" <bill.wycko@sfgov.org>
cc

Subject I am against the Beach Chalet Athletic Fields project

Hello Bill,

I want to express my concern and dismay at the proposed soccer field. This project will seriously affect local wildlife as well as removing yet more natural space. I recall when (not so long ago) Union Square was a lovely mound of lush green grass with trees, now it's an ugly concrete business square. This makes a negative impact on our smog level. I am opposed the 60 foot sports lights because I think they will ruin the experience of the park and Ocean Beach at night. I also feel that the millions of dollars this will require could be better spent fixing the area up for more environmental usage. I'm actually a little flabbergasted SF can give up it's Championship Football Team but plans to build a million dollar soccer field!

I love this city, I enjoy biking, hiking and enjoying stargazing at the beach or enjoying nights at the Beach Chalet and Cliff House. These experiences will all be ruined for us if this project is allowed to move forward.

Jessica Brown
730 Hayes St
San Francisco, CA 94102

01
02
03
04
05

From:
Charles Buckbee
662 46th Avenue
San Francisco, CA 94121

December 9, 2011

RECEIVED

DEC 12 2011

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M E A

To:
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 have lived in the Richmond since 1985. I helped raise 2 children here in the Richmond.

I am fully in favor of the soccer field renovation that is proposed for the western edge of Golden Gate Park.

I now have a grandchild who will soon be able to play at those fields. He will be getting a soccer ball for Christmas, from me.

Cities are green environments because their density helps curtail sub-urban sprawl into agriculture and wilderness areas. Improvements such as this would contribute in a positive way to the urban environment.

When I first moved to San Francisco in 1975, there were bathrooms north of Lincoln at the beach and there were hot showers at China Beach and Aquatic Park. At the time I was disappointed that I had missed Fleishhacker pool and the Sutro Baths.

On a very hot day when the beach is packed to standing room only I notice a very small impact to my neighborhood.

I find it difficult to believe that people are concerned about the lights. Most people keep their shades drawn, day and night.

I say build it, build more, rebuild Sutro baths, bring bathrooms back, add a gymnasium; the western edge of San Francisco should become an athletic heaven.

Charles Buckbee

01

From: Nancy Buffum [<mailto:nancybuffum@sbcglobal.net>]
Sent: Monday, December 12, 2011 1:45 PM
To: bill.wycko@sfgov.org; don.lewis@sfgov.org
Subject: DEIR Comment: BEACH CHALET ATHLETIC FIELDS RENOVATION

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 have grave concerns about the proposal to renovate the Beach Chalet Athletic Fields with artificial turf and stadium lights. I feel that the Planning Commission and the DEIR are minimizing negative environmental impacts-- to natural life in Golden Gate Park, and to the true purpose of the West end of the park to San Francisco residents.

01

I also question the overall financial advantages of concentrating heavy use to these fields, versus improving other SF athletic facilities, and doubt the long term savings of artificial turf over grass fields.

02

The Compromise Alternative (put forth by the public during the Planning Commission hearing of December 1st, 2011) 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 natural parkland.

03

The DEIR finds 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 other areas of environmental concern, the DEIR findings fall short.

I request that the following areas be explored further:

1. Lighting

Artificial light has a profound effect on wildlife, particularly migrating birds. What is the cumulative effect of the parking lot and walkway lighting as well as the fields lighting? Has this been measured? How is the increase in artificial night lighting compatible with San Francisco's goals of decreasing light pollution?

04

2. Master Plan, paving and artificial turf versus natural grounds.

What is total coverage in square footage of the artificial fields and the new paved paths? How does this comply with the Golden Gate Master Plan for the West end of the park? Please consider the cumulative impact of the proposed fields along with the footprint of the Wastewater Treatment Plant.

05

3. Cost of maintenance

What are the increased costs in personnel, equipment and materials to the expanded use of the fields?

Is it planned that fees for field use remain affordable to the community-based groups and leagues that currently use these and other Park & Rec fields?

Please factor in the life of an artificial turf field--generally about 12 years. What is the cost of replacing the fields?

Please factor the construction costs plus maintenance costs plus replacements costs and compare to the Compromise Alternative construction and maintenance.

06

4. Artificial turf never goes away

Proponents of artificial turf advocate for it as a way of re-using discarded tires. Our natural world is experiencing a complete overload on waste from petroleum byproducts. Artificial turf is a non-biodegradable waste product made of toxic material.

Children playing, wildlife, casual users of the park, and park neighbors are not the beneficiaries of artificial turf--the artificial turf companies are.

07

Introduction of a toxic non biodegradable waste product into our park when San Francisco is in the forefront of recycling and clean energy is contrary to the positive direction the city is heading. PLEASE COMMENT.

Please send an e-copy of the Comments and Responses and the Final EIR to my e-mail address.

Please send acknowledgement that you have received this letter.

Sincerely,

*Nancy Buffum
4115 Kirkham Street
San Francisco, CA 94122
nancybuffum@sbcglobal.net*

I-Campos

From: Roland Campos <metathoughts@gmail.com>
To: bill.wycko@sfgov.org, don.lewis@sfgov.org
cc: sfoceanedge@earthlink.net

Date: Sunday, December 11, 2011 04:53PM
Subject: Beach Chalet Soccer Fields - DEIR comment letter

Dear Mr. Wycko:

I urge the Planning Commission to STOP the Beach Chalet Soccer Complex project, because the proposed use of artificial turf and stadium lighting to extend use beyond daylight hours is a blatant violation of the environment defined in the Golden Gate Park Master Plan for the park.

Consider this email to constitute Notice to the City that this project in its current design would be such a violation. It's appalling that citizens have to stand up to protect Golden Gate Park from being damaged by the San Francisco Recreation and Park Department.

The environment at the western end of Golden Gate Park would be blemished, defaced, downgraded, and polluted by the use of artificial turf and stadium lights. Their use would be an ugly blemish that current San Francisco residents and generations to follow would endure, not to mention the damage to the wildlife that graces the area. Please put the long term guidance of the Golden Gate Park Master Plan before the precipitous pressures of those who have no appreciation for the sylvan and pastoral environment advocated in the Golden Gate Park Master Plan.

Beach Chalet Soccer Complex should only go forward if **living grass** is used and **absolutely no stadium lights or poles are erected.**

I am counting on the Planning Commission to protect the character and integrity of Golden Gate Park, in this instance, particularly of the the Beach Chalet field. Below are email communications I have sent to Mayor Ed Lee and Supervisor Mar that express my concerns, urging them to protect Golden Gate Park from being defaced by the use of artificial turf and stadium lightening at the Beach Chalet field.

Sincerely,

Roland Campos,
 Sunset District resident

----- Forwarded message -----

From: Roland Campos <metathoughts@gmail.com>
Date: Mon, Nov 28, 2011 at 12:59 PM
Subject: No artificial grass turf or stadium lights at Beach Chalet meadow in Golden Gate Park
To: mayoredwinlee@sfgov.org
Cc: "sfoceanedge@earthlink.net" <sfoceanedge@earthlink.net>

Dear Mayor Lee:

Please STOP the proposed Beach Chalet Soccer Complex and the proposed Westside Water Treatment facility. THESE DO NOT BELONG IN GOLDEN GATE PARK!

Artificial turf and stadium sports lighting are a major infringement to the character of Golden Gate Park. And the water treatment plant is also a major assault Golden Gate Park. Please take note of what the Golden Gate Master Plan states:

(p 4-5) "It's important to maintain the rural character in the western park."

* (p 6-1) "The demands for recreation need to be balanced with the objectives of preserving the original intent and purpose of the park as a sylvan and pastoral' retreat."

*(p 9-5) "Lighting is for safety purposes and is not intended to increase night use."

INSTEAD, of the above two proposed projects, please TAKE ACTION to do this:

Regarding Beach Chalet Meadow I request that you please support the following:

1. Renovate the existing LIVING GRASS PLAYING FIELD for one million dollars. **KEEP THE LIVING GRASS. NO PLASTIC TURF!**
2. Use non-lethal humane gopher controls for player safety
3. DO NOT erect field night lighting — **ABSOLUTELY NO SPORTS LIGHTING** — let's keep this area for recreation during the day and the wildlife at night.
4. **DON'T CUT DOWN THE SURROUNDING TREES!**
5. USE THE REMAINING ELEVEN MILLION DOLLARS BUDGET FOR OTHER PARKS AND PLAYING FIELDS.

Regarding the water treatment factory, I request that you please support the following:

1. **LOCATE THE FACILITY OUTSIDE OF GOLDEN GATE PARK**
2. **FOLLOW THE 1998 GOLDEN GATE PARK MASTER PLAN** and use this areas of Golden Gate Park for more meadows, LIVING grass practice fields, a new picnic area or new plantings for EVERYONE to enjoy — not a factory

I hope I can count on you to protect Golden Gate Park from the infringements I've mentioned above.

Sincerely,

Roland Campos

Sunset District resident

----- Forwarded message -----

From: **Roland Campos** <metathoughts@gmail.com>

Date: Mon, Nov 28, 2011 at 1:03 PM

Subject: No artificial grass turf or stadium lights at Beach Chalet meadow in Golden Gate Park

To: Eric.I.mar@sfgov.org

Cc: SF Ocean Edge <sfoceanedge@earthlink.net>

Dear Supervisor Mar:

Please STOP the proposed Beach Chalet Soccer Complex and the proposed Westside Water Treatment facility. THESE DO NOT BELONG IN GOLDEN GATE PARK!

Artificial turf and stadium sports lighting are a major infringement to the character of Golden Gate Park. And the water treatment plant is also a major assault Golden Gate Park. Please take note of what the Golden Gate Master Plan states:

(p 4-5) "It's important to maintain the rural character in the western park."

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I hope I can count on you to protect Golden Gate Park from the infringements I've mentioned above.

Sincerely,

Roland Campos
Sunset District resident

Hi Bill-

I sent this electronically -
once incorrect (having not
accepted "Save Changes")

+ once correct. (this am)

Here is a correct version.

Thanks

Jim

Jim Chappell

Strategic Planning | Government and Community Relations

415-285-0910 land
415-577-8913 cell
chappell_jim@att.net
708 Guerrero St., San Francisco CA 94110-1614

December 10, 2011

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

RE: Beach Chalet Athletic Fields Renovation
Case No. 2010.0016E
Comments on DEIR

Dear Mr. Wycko:

This letter incorporates and supplements a prior letter of November 21, 2011 to the Planning Commission.

Introduction

I have carefully reviewed the Draft Environment Impact Report on the Beach Chalet Athletic Fields and find it inadequate to address the impacts of this project. "An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information that enables them to make a decision that intelligently takes account of the environmental consequences." (DEIR, page I-5). This document virtually ignores the vast planning record related to the environmental and historic resources of the site and is thus inadequate to provide decision-makers with the information needed to take this into account.

01

The title of the project, "Beach Chalet Athletic fields Renovation" is a misnomer. The current fields are natural grass set in the western forest of the park; as such, they serve a dual role – providing playing fields for active sports enthusiasts, while maintaining the overall fabric of meadows, forests and lakes that define the character of Golden Gate Park.

02

The proposed project is not a simple renovation but rather a complete remake of the site into a semi-professional sports complex made of modern non-natural materials. It includes over 7 acres of artificial turf, 10 metal poles with over 150,000 watts of sports lighting, 60 more metal light standards with various types of night lighting, bleacher seating for over 1,000 people, increased

RE: Beach Chalet Athletic Fields Renovation

Case No. 2010.0016E

Comments on DEIR

December 10, 2011, page 2

paving and increased parking, all of it in an area that is now a grassy meadow in a grove of trees with no lights and a small parking lot. This semi-professional sports complex, which could be located on any open land or even on top of a parking structure, is instead proposed to be located within a major landscape park, a park that is renowned world-wide for its naturalistic beauty. It is located next to Ocean Beach, a popular spot for San Franciscans and visitors alike to enjoy the untamed beauty of the ocean. The project will destroy the natural beauty of this area and change its character forever to that of an urban development. This is contrary to all the planning documents and this over-riding value of this area is given little weight in the DEIR.

02
cont.

Urban Design Plan for the Comprehensive Plan (Master Plan)

The now world-famous Urban Design Plan (UDP) for the Comprehensive Plan of San Francisco (May 1971, Department of City Planning) states the following Policies for Conservation (page 66):

“Natural Areas Policy 1

Preserve in their natural state the few remaining areas that have not been developed by man. Natural areas in the city that remain in their original state are irreplaceable and must not be further diminished. Significant development should not take place in these areas, and facilities necessary to aid in human enjoyment of them should not disturb their visual feeling or natural ecology. Accordingly, parking lots and service buildings should be confined to areas that are already developed, and access pathways should be designed to have a minimal effect upon the natural environment. Where possible, the interior of these natural areas should be out of sight of the developed city.”

03

“Lands in public ownership, primarily those of the City and Federal governments, constitute the bulk of these natural areas. Coordinated programs for conservation of both land features and ecology should be carried out, with high priority given to such management functions. Where natural areas are in private ownership, either special incentives or public acquisition should be used to assure a similar degree of preservation.”

“Natural Areas Policy 2

Limit improvements in other open spaces having an established sense of nature to those that are necessary, and *unlikely to detract from the primary values of the open space.*¹ *The recreation and open space values of parks and other open and landscaped areas developed by man ought not to be reduced by unrelated or unnecessary construction. These resources are not expected to be increased substantially in future time, whereas the public need for them will surely grow.*”

“Facilities placed in these areas should be of a public nature and *should add to* rather than decrease their recreation and *open space values*. *Facilities that can be accommodated outside of established parks and open spaces should be placed at other appropriate locations. Where new*

¹ Italics are used to emphasize points

RE: Beach Chalet Athletic Fields Renovation
 Case No. 2010.0016E
 Comments on DEIR
December 10, 2011, page 3

facilities are necessary in these parks and open spaces, they should be sited in areas that are already partially developed in preference to areas with a greater sense of nature."

"Through traffic, parking lots and major buildings should be kept out of established parks and open spaces where they would be detrimental to recreation and open space values. Parking garages and other facilities should not be placed beneath the surface in these areas unless the surface will retain its original contours and natural appearance. Realignment of existing trafficways in these areas should avoid destruction of natural features and should respect the natural topography with a minimum of cutting and filling. The net effect of any changes in parks and open spaces should be to enhance their visual qualities and beneficial public use."

The chapter on Conservation, Human Needs includes areas that "have a special character worthy of preservation. These areas have an unusually fortunate relationship of building scale, landscaping, topography and other attributes that makes them indispensable to San Francisco's image." (UDP, page 49) *Golden Gate Park is included in the figure as having this 'generally pleasing' quality of visual form and character."*

The chapter on Neighborhood Environment, item 18, states: *"If auto traffic and parking in parks are discouraged, recreational use can be increased."* (UDP, page 121.) And yet the Transportation Section of the DEIR states that, "it is estimated that players, officials, or spectators do not typically use public transit to travel to and from the project site. Similarly, although some players, official or spectators may occasionally travel by bicycle or walk if they live nearby, these are not typical methods of travel. Therefore, *it was assumed for this analysis that all person trips generated by the project would be automobile trips.*" (DEIR, page IV.D-7, 8.)

The UDP Chapter on Policies for Neighborhood Environment, Opportunity for Recreation, Policy 9 states: "Maximize the use of recreation areas for recreation purposes. *Parks provide their greatest service to the community when they bring a sense of nature to city residents. Recreation facilities suited to each park and its neighborhood should be installed and maintained, while facilities not primarily intended for recreation or not requiring a park location should be placed outside the park system."*

"...Automobile traffic in parks should be minimized, and where possible, means of transportation other than automobiles should be provided in large parks. Automobile parking should occur at the ends of parks, preferably outside the park boundaries. Parking lots and other visually distracting uses should be screened from the areas devoted to recreation." (UDP, page 129.)

The proposed project violates all of the above precepts: it takes a landscaped area and replaces with it with a paved surface, it limits the use of the area to a narrow group of a specific subset of athletically-inclined users instead of retaining the multi-use nature as intended for Golden Gate Park's open spaces, it destroys the unique landscape character of the area, it introduces more automobile traffic and parking both to the park environs and inside the park, it does not screen

03
cont.

RE: Beach Chalet Athletic Fields Renovation
 Case No. 2010.0016E
 Comments on DEIR
December 10, 2011, page 4

the parking from the open space area, it degrades the sense of nature in a major park, and it could be placed on any vacant land or indeed on rooftops or on top of major garages, in the city.

03
cont.

And yet the DEIR totally ignores the above Conservation Policies of the Urban Design Element of the Master Plan.

Western Shoreline Area Plan / Local Coastal Program

The DEIR also contradicts the comments received from the California Coastal Commission (CCC) in their letter of March 3, 2011 to the Planning Department. In that letter, the CCC states that the Local Coastal Program (LCP) policy "requires the visual and physical connection between Golden Gate Park and the beach be strengthened and *emphasize the naturalistic landscape qualities of the west end of the park for visitor use...*" However, the DEIR states that "*the project would not emphasize the naturalistic landscape qualities at the western portion of the park, as the project site is located within areas designated for active recreation.*" (DEIR, p III-4.) This statement ignores the fact that *the entire concept of the western end of Golden Gate Park is that active recreation is contained within the naturalistic landscape qualities of the park; nowhere is it stated that the naturalistic qualities of the parkland can be destroyed for recreation uses.*

04

The DEIR also states that the Western Shoreline Area Plan includes "*extending the reforestation program, which has been established to replace dead and dying trees at the windbreak along the ocean, throughout the park to ensure vigorous forest tree growth and maintain high visual quality; emphasizing the naturalist landscape qualities existing at the western portion of the park, and encouraging increased visitor use in the area.*" (DEIR p. II-4.) However, the DEIR ignores the loss of over 55 trees in this project and the cumulative loss of hundreds more trees in conjunction with the proposed Westside Water Treatment Plant project. It ignores the impact on the windbreak of the loss of these trees. The proposal later in the DEIR to replant trees on a 1 to 1 basis ignores the fact that the new trees will not be mature enough for many years to provide either a visual screening or an impact on the strong winds that come in from the ocean, thus potentially damaging the interior of the park. The DEIR also ignores the fact that the Murphy windmill is now completely and beautifully renovated and that, combined with the soon-to-be renovated Millwrights' Cottage Concession (which will contain a restaurant serving 3 meals a day and a kitchen garden, see attached RFQ), will happily increase visitors to the area. *Increasing visitors is good to a certain extent, but once we increase the total number beyond a certain number, we have an urban environment with minimal landscaping, not parkland with a few screened amenities.* Once that restaurant is up and running, and in conjunction with the clean-out of the corporation yard for either the proposed Westside Water Treatment Plant or for new meadows, as outlined in the Golden Gate Park Master Plan, this area should be amply busy while providing the parkland experience for visitors.

05

RE: Beach Chalet Athletic Fields Renovation
 Case No. 2010.0016E
 Comments on DEIR
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San Francisco General Plan - Recreation and Open Space Element (ROSE)

The DEIR also ignores the adopted Recreation and Open Space Element of the General Plan (1986, City Planning Department). While a new ROSE is well underway, the adopted ROSE, underway at the same time as the Golden Gate Master Plan (Policy 2.10, page 30 et seq.), states:

“To address these problems, work on the Master Plan has begun. The overall goal of the Golden Gate Park Master Plan should seek to *retain the integrity of the park's original design* while having sufficient flexibility to accommodate society's evolving needs. In 1979, the Recreation and Park Commission, adopted “Master Plan Objectives and Policies for Golden Gate Park,” to guide any necessary changes, act as a blueprint to guide maintenance of the park's rich landscape, and steward Golden Gate Park through the next century. The objectives are to:

1. Acknowledge Golden Gate Park's contribution to the diversity of cultural and recreational activities available to residents of San Francisco and the Bay region; recognize the park's importance as an American cultural resource.
2. *Provide for the protection and renewal of the park landscape.*
3. *Preserve the open space of Golden Gate Park.*
4. Create and maintain a park-wide system of recreation roadways, pathways and trails. *Minimize vehicular traffic.*
5. Foster appropriate use of park recreation resources.”

06

“Consideration should be given to establishment of a separate public advisory committee, supported by a professional staff consisting of planners, landscape architects, recreation specialists, and horticulturists to prepare the plan. This advisory committee should report to the Recreation and Park Commission. The objectives and policies serve as the basis for five master plan elements which should carry out the adopted policies, and address specific issues and park features. The five elements are:

- Forest Management
- Circulation-Transportation Management
- Land Use
- Landmarks and Structures
- Landscape Design

“The first two elements, Forest Management and Circulation, have been adopted by the Recreation and Park Commission and are being implemented. The City should provide the necessary resources to complete the remaining master plan elements. The five elements are described below:

“Forest Management

The Forest Management Element addresses the problems of the park's forest and vegetation. It includes an extensive tree inventory, *reforestation program*, and management and design guidelines.”

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Case No. 2010.0016E
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December 10, 2011, page 6

“Circulation - Transportation Management

The Transportation Management Plan focuses on all forms of access to and circulation throughout the park. This element is designed to create and maintain a park-wide system of recreational roadways, pathways and trails while *minimizing vehicular traffic*. Key elements include the restriction of through-traffic to designated roadways and reduction of the number and impact of such roadways. *The plan encourages use of public transit*, development of a safe and inviting pedestrian system, and accommodation of bicycle and equestrian trail systems.”

“Land Use

The land use element should update the existing inventory of land uses, facilities, structures, and recognized landmarks and identify appropriate areas for required land uses throughout the park. *All activities, features and facilities should be subordinate to the present design and character of the park. The plan should preserve the park's valuable open space and not permit construction of new recreation or cultural buildings within Golden Gate Park unless incidental to enjoyment of the Park's open space. No additional roadways should be allowed to encroach on the park. Emphasis should be given to activities which do not diminish open space. The primary function of the park is to serve the recreation needs of all San Francisco residents. Neighborhood serving facilities should be located in the adjacent neighborhoods themselves.*”

“Landmarks and Structures

The landmarks and structures element should evaluate historic values, and physical and structural conditions, and current and required maintenance levels of the park's landmarks and structures. An inventory of existing structures and recognized landmarks should be updated. The plan should encourage restoration and reconstruction of landmarks and require *that any modification or replacement of existing buildings be compatible with the landscape character and historic features of the park*. Restoration requirements should be identified and programmed as part of the capital improvement budget, or other funding sources. While advocating the provision of park amenities and visitor services, the plan should *prohibit any construction which would detract visually or physically from the character of the park.*”

“Landscape Design and Features

The landscape design element of the master plan should provide for the protection and renewal of the park's unique landscape areas. The size and form of the park's major pastoral landscape elements, its meadows and wooded areas should be retained and renewed. Similarly, the overall evergreen landscape character of the park should be maintained as the dominant design element. This element should closely coordinate with the forest management element. Existing formal gardens and colorful horticultural displays should be retained, in areas designated in early park plans; however, new colorful horticultural displays should not be introduced into predominantly evergreen areas. Landscape design standards should be employed to guide restoration and maintenance of meadow areas, lake and water course edges, park entrances and pedestrian pathways, intensive recreation use areas, and roadways and other paved areas.”

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cont.

RE: Beach Chalet Athletic Fields Renovation
 Case No. 2010.0016E
 Comments on DEIR
December 10, 2011, page 7

Again, since the ROSE is not discussed in the DEIR, it is not possible for decision-makers to evaluate the proposed actions against these strictures.

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cont.

The Golden Gate Park Master Plan (GGPMPP)

Since the adoption of the ROSE, the Golden Gate Park Master Plan was developed over a period of several years with the benefit of thousands of hours of public input, and subsequently adopted.

“Golden Gate Park has been a part of San Francisco for over 120 years. Over that time, the city and the lives of its citizens have changed dramatically, *yet the purpose and use of Golden Gate Park has remained remarkably unchanged.* Today, as one hundred years ago, people are coming to Golden Gate Park to picnic, walk, bicycle, to feed the ducks, to see the bison, and ‘*as a relief and counterpoise to the urban life.*’ This is an enduring tribute to the vision and design that created the park. The park is as vital today as it was a hundred years ago, perhaps more so. Golden Gate Park is both a 19th century ‘pleasure ground’ and a modern urban park.” (GGPMP, page 1-1.)

07

“The Master Plan for Golden Gate Park is intended to provide a framework and guidelines to ensure responsible and enlightened stewardship of the park. *The goal is to manage the current and future park and recreation demands while preserving the historic significance of the park. As such, the plan is a preservationist plan, and proposed changes respect the historic context of the park.*” (GGPMP, page 1-6.)

“Golden Gate Park Mission Statement

The Purpose of Golden Gate Park is to serve as an open space preserve in the midst of San Francisco. This historic park is a cultivated pastoral and sylvan landscape, defined by an abundant evergreen woodland. It is designed and managed to afford opportunities for all to experience beauty, tranquility, recreation and relief from urban pressures.” (GGPMP, page 3-2)

The purpose of the Objectives and Policies is to preserve Golden Gate Park’s contribution to the diversity of cultural, natural and recreational resources available to park visitors from San Francisco, the Bay region, and elsewhere. *Golden Gate Park should be recognized as an important American Cultural Resource.”* (GGPMP, Page 3-2).

“William Hammond Hall envisioned the park in two different regions. The park land east of Strawberry Hill includes a variety of intensively cultivated areas and developed facilities while the park land to the west is pastoral and woodland landscape with open meadow defined by stands of trees and enhanced by lakes.” (GGPMP, page 3-2.)

RE: Beach Chalet Athletic Fields Renovation
 Case No. 2010.0016E
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December 10, 2011, page 8

"The western park was to be: 'simply treated as a woodland or forest, with all the hills and ridges more or less heavily timbered, and the valleys covered with lower-growing shrubs or field grasses.'" (GGPMP, page 4-5.)

"Over the years, facilities have been added to the western park, but the character of the landscape has remained as more wooded, less refined parkland. This distinction should be maintained, with different landscape treatments for the eastern and western portions." (GGPMP, page 4-5.)

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cont.

Ocean Beach Master Plan - Long-Range Planning Process

The Ocean Beach Master Plan is nearing completion. Material from this plan has been available but is not included in the DEIR. The Master Plan has resulted from a year-long process involving SPUR, various public agencies, and members of the public. The goals arrived at include restoring and establishing conditions that support thriving biological communities, and preserving and celebrating the beach's raw and open beauty. *The discussions for this project centered around welcoming a broader public while preserving the wild beauty of the beach. The DEIR did not consider these discussions or the impact that a semi-professional sports complex could have on Ocean Beach and the various activities that people go to the beach for – not only surfing and beach combing but also viewing the ocean and the sunset, stargazing and night time fire rings, which are intended to be enjoyed in the dark. The DEIR also does not consider the impact on the parking situation at Ocean Beach or the cumulative impact of the changes proposed for the Great Highway on the park users at the Beach Chalet fields.*

08

Conclusions

The DEIR ignores the body of evidence contained in the Urban Design Plan, Western Shoreline Area Plan / Local Coastal Program the Recreation and Open Space Element, the Ocean Beach Master Plan, and the Golden Gate Park Master Plan. Any public body utilizing this document to make decisions regarding the subject project will lack this information and thus the DEIR is inadequate. These aforementioned conflicts with these plans constitute significant precedent-setting impacts on this important historic and cultural resource.

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I hope the Planning Commission, the Planning Department and the Recreation and Park Department will direct that these important planning considerations be analyzed. I believe when so done, this project will be shown to constitute an unavoidable significant impact on Golden Gate Park.

Sincerely,


 Jim Chappell

Attachments:

RE: Beach Chalet Athletic Fields Renovation
Case No. 2010.0016E
Comments on DEIR
December 10, 2011, page 9

California Coastal Commission, Corr. to Don Lewis, from Renee T. Ananda, Coastal Program Analyst, March 3, 2011.

RFQ for Millwright's Cottage Concession, to Recreation and Park Commission from Recreation and Park Department, May 6, 2010

C.V. Jim Chappell

RE: Beach Chalet Athletic Fields Renovation
 Case No. 2010.0016E
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STATE OF CALIFORNIA - NATURAL RESOURCES AGENCY

EDMUND G. BROWN, JR., GOVERNOR

CALIFORNIA COASTAL COMMISSION

NORTH CENTRAL COAST DISTRICT OFFICE
 45 TREMONT ST. SUITE 2000
 SAN FRANCISCO, CA 94103-2719
 VOICE (415) 904-5262
 FAX (415) 904-5452
 TDD (415) 597-5895

RECEIVED

MAR 23 2011

CITY & COUNTY OF S.F.
 PLANNING DEPARTMENT
 M.E. 2

March 3, 2011

Mr. Don Lewis
 City and County of San Francisco
 1650 Mission Street, Suite 400
 San Francisco, CA 94103-2479

RE: Comments on Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Beach Chalet Athletic Fields Renovation SCH #2011022005

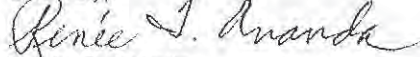
Dear Mr. Lewis:

Thank you for the opportunity to provide comments on the scope and content of the NOP for the Beach Chalet Athletic Fields Renovation DEIR. The proposed project site is located at the western end of Golden Gate Park in San Francisco. It entails renovation of the existing athletic fields, including installation of ten 60-foot-tall light standards to allow for night use, pedestrian lighting, and fencing; converting the existing grass soccer fields to artificial turf; renovating the existing restroom building and parking lot; and constructing pathways for pedestrians, maintenance workers, players, and spectators. The proposed project is located within the Coastal Zone, and the City is responsible for processing the coastal development permit (CDP) for the project. The legal standard of review for the CDP is San Francisco's certified Local Coastal Program (LCP). As such, Commission staff recommends that the DEIR analyze project impacts to coastal resources and the proposed project's conformity with the objectives and policies of the City's LCP, including but not limited to:

1. Golden Gate Park, Objective 3, Policy 1 of the LCP. This policy requires that the visual and physical connection between Golden Gate park and the beach be strengthened and emphasize the naturalistic landscape qualities of the west end of the park for visitor use. Commission staff suggests that the DEIR additionally evaluate whether the proposed project conforms with Objective 3, Policy 3 which requires that the City develop and periodically revise a Master Plan for the park to include specific policies for maintenance and improvement of recreational access in the western portion of the park (which is within the Coastal Zone);
2. Transportation, Objective 1, Policies 3 and 4 of the LCP, which require that incentives for transit usage and connections between local transit routes and regional transit be provided; and analyze the
3. Potential impacts of artificial lighting on biotic resources and the public's coastal recreational experience in the surrounding area and along Ocean Beach.

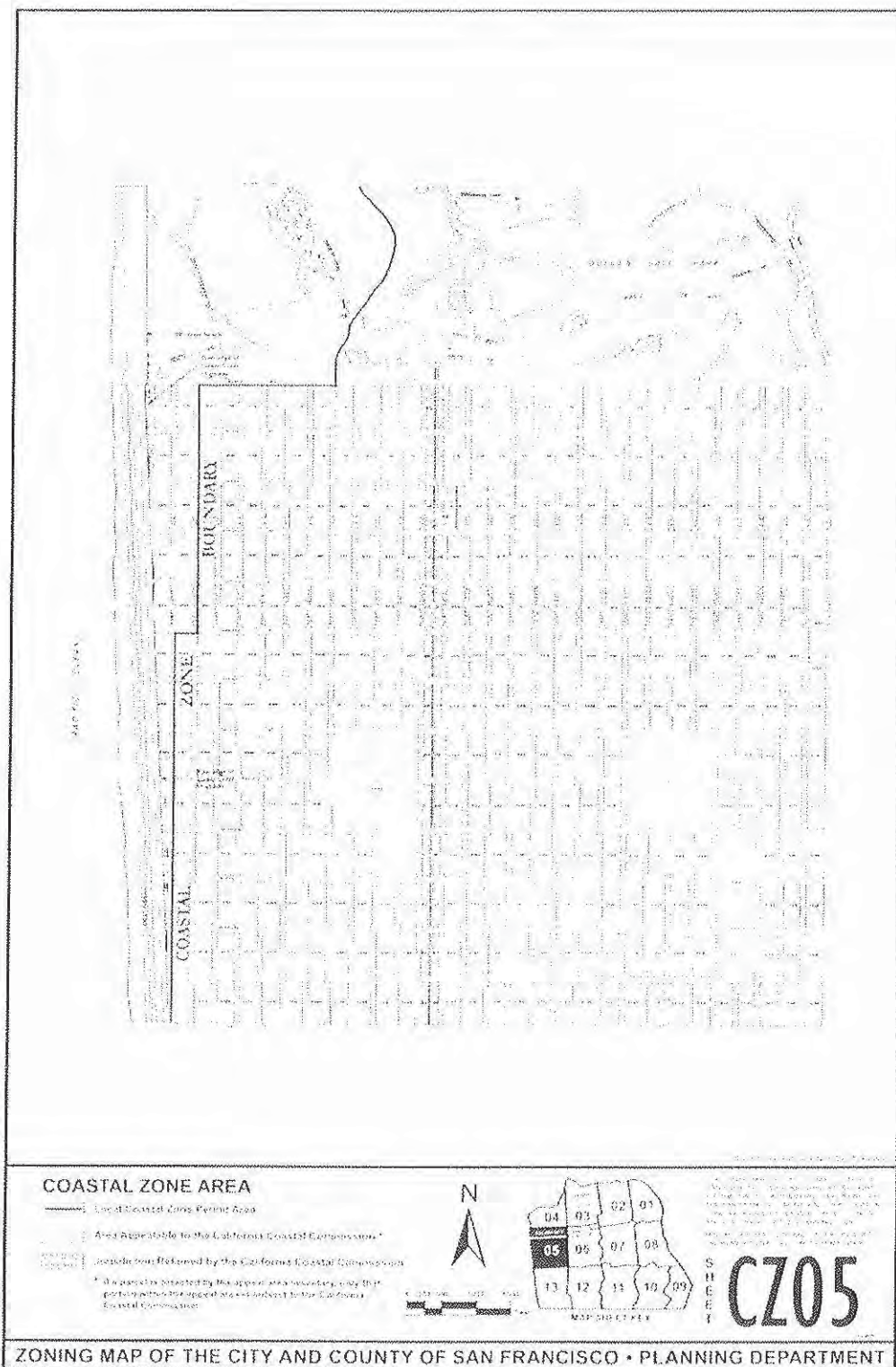
Please contact me at (415) 904-5267 or rananda@coastal.ca.gov if you have any questions.

Sincerely,



Renée T. Ananda
 Coastal Program Analyst

RE: Beach Chalet Athletic Fields Renovation
 Case No. 2010.0016E
 Comments on DEIR
December 10, 2011, page 11



RE: Beach Chalet Athletic Fields Renovation
 Case No. 2010.0016E
 Comments on DEIR
December 10, 2011, page 12



Mayer Gavin Nersisyan
 Philip A. Groberg, General Manager

Date: May 6, 2010
To: Recreation and Park Commission
From: Nick Kinsey
Through: Nicole Avril
Re: Request for Qualifications for the Millwright's Cottage Concession

Agenda Item Wording:

Presentation and discussion only on the selection of the response from Bacchus Management to the RFQ for the Millwright's Cottage Concession.

Background:

The Recreation and Park Commission approved the publication and distribution of a Request for Qualifications (RFQ) package on August 20, 2009. The RFQ solicited respondents to operate a concession at the Millwright's Cottage. The goals of the RFP are to activate the cottage and the western end of the park, create a restaurant that educates park users about windmills and sustainable agriculture and generate revenue to the Department. The Department received one proposal, from Bacchus Management, in response to the RFQ.

Selection Process:

Department staff recruited a 4-member Selection Panel (**Exhibit A**) to review the proposal. The proposal was evaluated on three main categories as set forth in the RFQ: Experience and Qualifications, Management and Business Plan, and the Financial Terms.

The Selection Panel convened on January 13, 2010 to review the proposal. After deliberating upon the merits of the proposal, the selection panel unanimously decided to select Bacchus.

Summary of Bacchus Proposal:

The Bacchus Management group, currently operating Spruce, Pizza Antica and The Village Pub, submitted a proposal to operate an English style public house in the Millwright's Cottage. The public house would serve traditional English fare and would offer a hearty atmosphere to match, providing park users respite from the elements. The menu would prominently feature sustainably grown foods including produce grown in an adjacent vegetable garden. The cottage would serve three meals a day as well as brunch on the weekends.

RE: Beach Chalet Athletic Fields Renovation
Case No. 2010.0016E
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Bacchus proposed to make the majority of the capital improvements necessary to operate the Cottage as a restaurant, a value totaling approximately \$300,000. Improvements include installing a commercial kitchen in the location, creating an organic vegetable garden on site, installing outdoor seating and renovating the interior to create a suitable dining area.

Additionally, Bacchus Management proposed incorporating the Cottage and restaurant into the surrounding landscape using elements such as outdoor seating, a vegetable garden and lawn bowling or horse shoes. The result would be a new destination in the far southwestern corner of Golden Gate Park.

In addition to the food service component of the proposal, Bacchus' proposal featured an extensive education program to inform school children, park visitors and the general public about healthy eating. These programs would include field trips for San Francisco Unified School District students to the cottage garden as well as programs for adults interested in sustainable agriculture and cooking.

In the proposal, Bacchus submitted a proposed Minimum Annual Guarantee of \$54,000 versus a percentage rent of 5%, with a projected annual rent payment of \$80,000. During the lease negotiation process, staff will negotiate appropriate financial terms commensurate with the size and scope of the endeavor as well as the level of capital improvements made by Bacchus to the Cottage.

Financial Impact:

If a lease is approved with the selected respondents, it would result in an increase of revenue of approximately \$80,000 to the Department annually.

Next Steps:

Department staff will begin negotiating a lease with Bacchus for the operation of the Cottage as a restaurant. As the Department is separately utilizing bond funds to complete a seismic retrofit of the Cottage, Department staff will begin coordinating the renovation work to ensure that the renovation is compatible with the final end use. Upon successful negotiation of a lease with Bacchus, Department staff will return to the Commission soliciting approval of the lease.

Supported By:

Selection Committee (unanimously)
Department management and staff

Opposed By:

None known

Attachments:

Exhibit A – Selection Panel

RE: Beach Chalet Athletic Fields Renovation
 Case No. 2010.0016E
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December 10, 2011, page 14

Jim (James T.) Chappell

415-285-0910 land
 415-577-8913 cell
 Chappell_jim@att.net
 708 Guerrero St., San Francisco CA 94110-1614

Jim Chappell is an experienced non-profit executive director and community opinion leader noted for helping turn SPUR, the San Francisco Planning and Urban Research Association, into one of the nation's pre-eminent non-profit civic affairs think-tanks. In addition, he conceived and led the efforts to build the SPUR Urban Center, a 14,500 square foot \$14 million community center that opened in May 2009. He is noted for bringing a culture of balanced and informed debate to San Francisco Bay Area community issues through research, education, and public advocacy.

He is, in addition, a professional urban planner with particular emphasis in park and recreation planning and historic preservation. He has planned major parks in California, Colorado, Alaska, Delaware, and Pennsylvania. From 1982 through 2011, he taught the course "Gardens, Parks and Urban Open Spaces" in the Landscape Architecture program at the University of California at Berkeley, San Francisco Extension. He additionally has taught landscape architecture at California College of Arts, the Academy of Art University, and the San Francisco Architecture Club. He is a member of the Society of Architectural Historians, as well as the American Planning Association. He was a charter member of the American Institute of Certified Planners.

Education:

- Master of City Planning, University of Pennsylvania
- Bachelor of Architecture, Syracuse University

Employment History:

- San Francisco Planning and Urban Research Association (SPUR) 1994 – 2009. Fifteen years, President and Executive Director
- prior: City and regional planning consultant with EDAW, Inc., Bechtel, Inc., and Wallace, McHarg, Roberts and Todd, in San Francisco, Denver, and Philadelphia

Other

- 1982 – 2011: faculty, University of California at Berkeley San Francisco Extension, "Gardens, Parks and Urban Open Spaces", a cultural history of parks and open space design over the last three thousand years
- prior: urban design faculty, Academy of Art University
- prior: faculty, California College of Arts and Cogswell College, history of architecture and landscape architecture
- prior: U. S. Peace Corps, Volunteer architect, Office of Rural Public Works, Iran

Professional Memberships

Member, American Planning Association; member, Lambda Alpha International Honorary Land Economics Society; member, Urban Land Institute; associate, American Institute of Architects; member, Society of Architectural Historians; member, Cultural Landscape Foundation; member, Landmark Society of Western New York

RE: Beach Chalet Athletic Fields Renovation
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Civic Leadership

- Director, Campus Facilities Improvement Association, University of California San Francisco at Mission Bay
- Alternate Commissioner, Bay Conservation and Development Commission, appointed by Governor Gray Davis
- Founding board member, Yerba Buena Community Benefit District
- Board member, Union Square Business Improvement District
- Advisory Board, Architectural Foundation of San Francisco
- Advisory Council, Market Street Railway
- Prior: City College of San Francisco Bond Oversight Committee
- Prior: Advisory Council, Dorothy Erskine Open Space Fund
- Prior: Advisory Council, Alliance Française de San Francisco

Recent Honors and Awards

Port of San Francisco Commendation; Yerba Buena Alliance Unsung Hero Award; SPUR Urban Leadership Award; Friends of City Planning Honor Award; Gerbode Fellowship, Wallace Alexander Gerbode Foundation and the University of California; Member of the Year, Lambda Alpha International Land Economics Society; Traveling Fellowship, French Ministry of Culture and the French American Foundation; Featured speaker, Foundation for Multiple and Intensive Land Uses, University of Amsterdam; Honor Award, California Chapter, American Institute of Architects; Honor Award, San Francisco Chapter, American Institute of Architects; Special Achievement Award, San Francisco Chapter, American Institute of Architects; Honor Award, Chinese American Voter Education Committee; Excellence in Leadership Award, California Association of Nonprofits

Jim Chappell

Strategic Planning | Government and Community Relations

415-285-0910 land

415-577-8913 cell

chappell_jim@att.net

708 Guerrero St., San Francisco CA 94110-1614

November 21, 2011

Planning Commission

RE: Beach Chalet Athletic Fields Renovation

Case No. 2010.0016E

Comments on DEIR

Dear Commissioners:

You will be considering the adequacy of the DEIR on the above-referenced project at an upcoming meeting. I offer the following comments for your consideration.

I have carefully reviewed the Draft Environment Impact Report on the Beach Chalet Athletic Fields and find it inadequate to address the impacts of this project. "An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information that enables them to make a decision that intelligently takes account of the environmental consequences." (DEIR, page I-5). The document dismisses the Golden Gate Park Master Plan with the statement "...consistency of the proposed project with the Park Master Plan will be determined by SFRPD Commission when the project is considered for approval." (page III-9).

The Golden Gate Park Master Plan was developed over a period of several years with the benefit of thousands of hours of public input. As a planner, I am concerned that the Master Plan should be so discounted in this DEIR.

Referencing the Golden Gate Park Master Plan (GGPMPP):

"Golden Gate Park has been a part of San Francisco for over 120 years. Over that time, the city and the lives of its citizens have changed dramatically, yet the purpose and use of Golden Gate Park has remained remarkably unchanged. Today, as one hundred years ago, people are coming to Golden Gate Park to picnic, walk, bicycle, to feed the ducks, to see the bison, and 'as a relief and counterpoise to the urban life.' This is an enduring tribute to the vision and design that created the park. The park is as vital today as it was a hundred years ago, perhaps more so. Golden Gate Park is both a 19th century 'pleasure ground' and a modern urban park." (GGPMP, page 1-1).

"The Master Plan for Golden Gate Park is intended to provide a framework and guidelines to ensure responsible and enlightened stewardship of the park. The goal is to manage the current and future park and recreation demands while preserving the historic significance of the park. As such, the plan is a preservationist plan, and proposed changes respect the historic context of the park." (GGPMP, page 1-6).

"Golden Gate Park Mission Statement

The Purpose of Golden Gate Park is to serve as an open space preserve in the midst of San Francisco. This historic park is a cultivated pastoral and sylvan landscape, defined by an

01

abundant evergreen woodland. It is designed and managed to afford opportunities for all to experience beauty, tranquility, recreation and relief from urban pressures.” (GGPMP, page 3-2)
RE: Beach Chalet Athletic Fields Renovation
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November 21, 2011, page 2

“Objectives and Policies Statement of Purpose

The purpose of the Objectives and Policies is to preserve Golden Gate Park’s contribution to the diversity of cultural, natural and recreational resources available to park visitors from San Francisco, the Bay region, and elsewhere. Golden Gate Park should be recognized as an important American Cultural Resource.” (GGPMP, Page 3-2).

“William Hammond Hall envisioned the park in two different regions. The park land east of Strawberry Hill includes a variety of intensively cultivate areas and developed facilities while the park land to the west is pastoral and woodland landscape with open meadow defined by stands of trees and enhanced by lakes.” (GGPMP, page 3-2).

“The western park was to be: ‘simply treated as a woodland or forest, with all the hills and ridges more or less heavily timbered, and the valleys covered with lower-growing shrubs or field grasses.’” (GGPMP, page 4-5).

“Over the years, facilities have been added to the western park, but the character of the landscape has remained as more wooded, less refined parkland. This distinction should be maintained, with different landscape treatments for the eastern and western portions.” (GGPMP, page 4-5).

The DEIR ignores this body of evidence contained in the Golden Gate Park Master Plan. Any public body utilizing this document to make decisions regarding the subject project will lack this information and thus the DEIR is inadequate. These aforementioned conflicts with the Master Plan constitute significant precedent-setting impacts on this important historic and cultural resource.

I hope the Planning Commission will direct that these important planning considerations be analyzed. I believe when so done, this will constitute an unavoidable significant impact of this project.

Sincerely,

Jim Chappell

01
cont.

From: Robert Cherny [<mailto:robt.cherny@gmail.com>]
Sent: Wednesday, November 30, 2011 6:26 PM
To: c_olague@yahoo.com; rm@well.com; wordweaver21@aol.com;
plangsf@gmail.com; mooreurban@aol.com; Bill Sugaya; rodney@waxmuseum.com;
Linda.Avery@sfgov.org; john.rahaim@sfgov.org
Subject: proposed new soccer fields in Golden Gate Park

Dear Commissioners,

I'm sorry that I cannot attend your meeting tomorrow, but I have teaching obligations.

I'm writing to you to urge that you give your very careful attention to the proposal to install artificial turf and powerful lighting at the Beach Chalet soccer fields in Golden Gate Park.

I was a member of the Landmarks Preservation Advisory Committee at the time we approved the National Register nomination for Golden Gate Park. As an historian of San Francisco, I am also familiar with much of the history of Golden Gate Park. As a resident of the city living near the park, I treasure its many historic, cultural, and ecological resources. It is a rare week that goes by when I don't walk in the park.

I find the proposed soccer fields, with artificial turf and powerful lighting, to be out of keeping with the Golden Gate Park Master Plan, which emphasizes the importance of maintaining the natural and sylvan landscape of the park. It is also a significant change in the very nature of the park. In general, the development of the park has located such features as the museums, the Music Concourse, the Conservatory, the Sharon Building and Children's Playground, and the Kezar Stadium and Pavilion in the eastern half of the park. The western half of the park has, with few exceptions, remained more natural, pastoral, and sylvan. This proposal is therefore a substantial departure from the historical development of the park as well as from the park's own master plan.

I'm especially upset that the poor maintenance by the Recreation and Park Department of the existing soccer fields is being used as justification for this significant change in the nature of the park. To accept that justification is to provide a green light to the park administration to withdraw maintenance from any part of the park where the administration wants to force through future changes regardless of its own master plan.

I've just today read the proposed alternative developed by San Francisco Heritage. I find that proposal to be far superior to the proposal before you. It would improve the existing soccer fields and also provide additional facilities outside Golden Gate Park,

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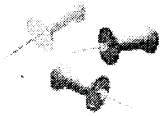
thereby preserving the current master plan but also providing much improved soccer facilities. As a grandfather of a girl who seems very interested in soccer, I want the city to have improved soccer facilities. But they should not come at the expense of our world-famous park.

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cont.

Please direct the department to return to the planning stage, and to work with Heritage as well as with the proponents of better soccer fields in developing a plan that respects the master plan for the park and the historical and ecological resources of the park at the same time that it provides improved soccer facilities.

Thank you for your attention.

Robert Cherny, Professor of History
San Francisco State University



Bill Wycko/CTYPLN/SFGOV
11/21/2011 01:31 PM

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

cc

bcc

Subject Fw: Beach Chalet Env. Impact Report

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 11/21/2011 01:31 PM -----



Donald Ciccone
<donciccone1@yahoo.com>

11/21/2011 01:27 PM

Please respond to
Donald Ciccone

<donciccone1@yahoo.com>

To SF Ocean Edge <sfoceanedge@earthlink.net>

cc "bill.wycko@sfgov.org" <bill.wycko@sfgov.org>

Subject Beach Chalet Env. Impact Report

Dear Mr. Wycko -- This letter is to inform you that I am a resident of the Outer Sunset and have been for 27 years and I am very strongly opposed to the plan to replace the soccer field out here with artificial turf and pavement and lights all around it. It amazes me that in this "back to nature" day and age you would even consider such a plan. The area around the field and even the field itself has become a haven for wildlife. I have seen many ravens and some blue heron there. This park belongs to the people of the city and was meant to be enjoyed by all. Any changes made should be up to the people who live here and should be done in their interest not the interest of contractors and paid off politicians!

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02

DO THE RIGHT THING AND LISTEN TO THE PEOPLE FOR A CHANGE! If my neighbors are for it, so be it. But I don't think they are.

many thanks -- Don Ciccone

1300 La Playa #2
San Francisco, CA 94122

From: SF Ocean Edge <sfoceanedge@earthlink.net>

To: sfoceanedge@earthlink.net

Sent: Monday, November 21, 2011 12:38 PM

Subject: Alert! December 1st public hearing at Planning Commission - for Beach Chalet Env. Impact Report (27,30,32,33,34)

*** IMPORTANT PUBLIC HEARING ***
GOLDEN GATE PARK
DRAFT ENVIRONMENTAL IMPACT REPORT

(DEIR)

for the

***Beach Chalet Athletic Fields
Artificial Turf and Stadium Lighting Project
Thursday, December 1, 2011***

San Francisco Planning Commission

City Hall, Room 400, Time: TBA

(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** with updated meeting time. 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.

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 .

Thank you, everyone!
SFOE

From: Ben Citron [<mailto:citronben@gmail.com>]
Sent: Sunday, December 11, 2011 10:20 PM
To: sfoceanedge@earthlink.net; bill.wycko@sfgov.org; don.lewis@sfgov.org
Subject: Beach Chalet Soccer Fields - DEIR comment letter

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 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 1st, 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.

01

As a resident of the Sunset district and a frequent visitor to the park, I am aghast at the idea of a sports complex disturbing the tranquility of the western edge. The traffic, the litter, the noise and lights are all completely out of sync with the serene character of the surroundings. As an avid cyclist I fear for my safety if so much new traffic is introduced into the confines of the park. As a lover of nature I worry that animal habitats will be adversely affected and litter will increase. As an urban dweller I find it unconscionable that we might diminish the beauty of so unique and precious a natural resource.

02

I would also add that I am the father of two young sons. There is no question that my family would enjoy some benefit from having a new soccer facility nearby. But to our minds the trade-off simply isn't worth it. And it just doesn't seem fair that a single interest/activity (soccer) gets elevated in importance to such a high degree over all others (biking, birding, jogging, stargazing, etc.).

03

Below is a list of specific concerns that are of importance to me.

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

04

- o 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 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?
- 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.
- 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:

- Rec and Park has talked of closing the Park at night -- how will this impact traffic in this area?
- How will having large crowds in this area impact Rec and Park trying to close the Park at night?
- 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?
- What is the impact on the Ocean Beach parking lot of large games at the soccer complex?
- 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?
- 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.
- 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? 17
- 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?
- 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,

Ben Citron
1558 34th Ave.
San Francisco, CA 94122

BILL WYCKO

I-AClark

Environmental Review Officer
Beach Chalet Fields Renovation
San Francisco Planning Department

Review and Comments on the Draft Environmental Impact Report (DEIR) for the Beach
Chalet Athletic Fields Renovation (Planning Department Case No 2010.0016E)

Received from Ann Clark, Ph.D., 2000 Monterey Blvd., San Francisco, Ca 94127.

Signed Andrea Modena Date 12/12/11 Time 10:55 AM.

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

TO: Environmental Review Officer
Beach Chalet Fields Renovation
San Francisco Planning Department

FROM: Ann Clark, Ph.D.

Date: December 12, 2011

Subject: Review and Comments on the Draft Environmental Impact
Report (DEIR) for the Beach Chalet Athletic Fields Renovation
(Planning Department Case No 2010.0016E)

Summary of Review

The DEIR has three significant problems which undermine the DEIR research, findings and report on environmental impacts, mitigation measures and alternatives. The DEIR is not thorough and comprehensive.

The research problems call into question the validity and reliability of the DEIR findings and conclusions regarding significant environmental impacts of the Beach Chalet project. Additional research is strongly recommended.

An unexpected finding is a fourth problem. The DEIR proposed schedule appears to have very limited soccer play time for children under eight years old (U 8) and children under ten years old (U10) during the school year. The DEIR proposed increased schedule is for older teens and adults. This must be studied and addressed.

Problem One The most critical and significant problem for the entire DEIR is the lack of in-depth and substantive research on the number of people who will use the proposed soccer fields and on the corresponding lack of in-depth and substantive research on the environmental effects and consequences.

Based on the DEIR's proposed use of the Beach Chalet fields, from 8:00am or 9:00am to 10:00pm, Monday-Sunday, 365 days a year, rain or shine, the DEIR's people analysis is weak and confusing, as is the data—which appears to consist of "up-to's", estimates and "guess-timates".

Absent from the DEIR are comprehensive researched numbers of people use and the cumulative on-going effect of people and vehicle use on the environment. It is recommended that the reservation system be one source of data for a comprehensive study about the actual number of teams, team hours and team age groups played per day, per year, including peak periods and tournaments. The significant and critical question is what are the impacts and implications of the proposed people increased use on the environment.

It is common knowledge that people use at a site or an area have direct cumulative effects on environments. Cumulative effects lead to significant long-term, often irreversible environmental damage and degradation. Because of people use, areas and sites have been limited—even closed—to the public to protect and preserve environmental areas.

Think of it this way. You have a home in Tahoe or Bolinas on eleven acres and 1.2 million people come to visit you each year for ten years. What would be the cumulate environmental impact on your property and home?

Comprehensive and thorough research and analyses on people use and the effects on the environment is critically essential to the validity and reliability of the entire Beach Chalet DEIR and project.

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cont.

Problem Two A second critical problem is the lack of environmental and sustainable maintenance, protection, upkeep and preservation of the current and proposed Beach Chalet project.

The DEIR maintenance is the same for the proposed increased scheduled people use as it is for the current people use.

03

Staffing consists now and will consist of a 1/3 FTE maintenance position for the soccer complex. Based on a 40 hour week, the work schedule results in 2.6 hours per day for five days a week; 1.8 hours per day for seven days a week.

Given the extensive scope of the current and proposed Beach Chalet project, the extremely limited maintenance staffing is unacceptable for environmental protection and preservation and has a highly significant environmental impact.

Problem Three The Beach Chalet project is not a "stand alone, isolated" piece of real estate. The Beach Chalet environment is continuously and contiguously linked from the ocean to the beach, the highway and the surrounding park and neighborhood areas. The environment—with its unique micro-climate—is organically, inorganically and microscopically interconnected, interrelated, interactive and inter-correlated. People use and environmental change or damage in one area impacts all the areas.

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There is a lack of coordinated, comprehensive research that addresses the environment and significant environmental impacts of the Beach Chalet project's people use on nearby areas such as the ocean, beach, neighborhoods, businesses and park areas and the proposed Ocean Beach Master Plan and San Francisco Public Utilities Commission's water projects.

Problem Four The DEIR proposed schedule lacks an increase in appropriate soccer playing time for children under eight years old (U 8) and children under ten years old (U10) during the school year. Lack of playing time needs to be researched and analyzed. It is recommended that priority reservation times Monday through Friday and on Saturdays and Sundays be guaranteed for these children.

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People and the Environment

Problem One: People Use

Significantly lacking in the DEIR proposed plan is an accounting and analyses of the people use of the Beach Chalet soccer field complex. As a result, I did a beginning initial preliminary study of people use. More research needs to be done.

Initial Preliminary Study on Impact of Increased Soccer Playing Hours and People Use and Attendance: Beach Chalet Soccer Fields (IPS)

06

The initial preliminary study begins to examine the impact of the proposed increased soccer playing and the environmental effects of increased people use. The study and the results are reported in Appendix A.

Two sources were used to construct the IPS research model: the DEIR report and commonly accepted soccer league standards.

The results of the IPS clearly indicate the need for additional research and analyses of the impact of increased soccer playing and the environmental effects of increased people use and vehicle use on the Beach Chalet and the nearby park, ocean, beach, residential and business areas.

Initial Preliminary Study Summary

The DEIR proposal underestimates significantly the number of people and the people use on the Beach Chalet soccer complex and nearby ocean, beach, neighborhoods, businesses and park areas. The DEIR underestimates significantly the scope of the Beach Chalet project and the effects of people on environmental impact, protection and maintenance.

Findings

| | |
|-------------------------|---|
| <u>1,217,210 people</u> | total annual people use (factored at 355 days a year) (players, coaches, referees, staff, family, friends and spectators; does not include peak play and tournament statistics because statistics are not available; does not include security and first aide and medical emergency staff because statistics are not available.) |
| <u>304,280 vehicles</u> | total annual vehicles to soccer complex (355 days a year) (average four persons per car, truck or SUV; does not include peak play and tournament statistics because statistics are not available. DEIR findings report minimal use of bikes and public transit.) |
| <u>304,280 vehicles</u> | total annual vehicles from soccer complex (355 days) (average four persons per car, truck or SUV; does not include peak play and tournament statistics because statistics are not available. DEIR findings report minimal use of bikes and public transit.) |
| <u>608,560 vehicles</u> | total annual vehicles that need parking during soccer games (355 days per year) (does not include peak play and tournament statistics because statistics are not available. Saturdays and Sundays have high soccer-related vehicle use that spills over to the environments of John F. Kennedy Drive and adjacent beach, ocean, park, business and neighborhood areas.) |
| <u>18,166 hours</u> | total annual DEIR proposed soccer playing hours (DEIR proposed schedule: Monday-Sunday 8:00am or 9:00am to 10:00pm, Monday through Sunday. Factored at 355 days. Does not include warm-up time. The proposed goal in the DEIR report is 14, 230 total hours. In the SPUR City Fields report, 11,000 per field; 44,000 for four fields.) |

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cont.

Recommendations and Research

This is an initial preliminary study. Additional in-depth and substantive research and analyses are needed before any action is taken on the DEIR and the Beach Chalet proposed project.

The City Fields Report, Giving Every Child a Place to Play Ball and the DEIR provide information about the SFRPD soccer play reservation system. The reservation system should be an excellent source of data for schedules, playing time and team age-related play.

It is recommended that the research include three years' (2009-2011) reservation data to track and analyze (1) year-round playing time each day of the week for 365 days, (2) team age designations and playing time each day of the week for 365 days, and (3) team and league zip codes. Because this is public SFRPD play, the information is public, subject to the Sunshine Ordinance.

It is recommended that additional research sources be identified and used to examine, verify and provide in-depth analyses and findings on the environmental impact of the proposed increased public use of the soccer playing fields.

Community Involvement

It is recommended that a new research consulting and oversight committee be formed of groups and organizations from neighborhoods, community organizations, environmentalists, historical preservationists and soccer leagues to consult, oversee and sunshine the research, analyses, and recommendations. This follows the DEIR precedent which identifies San Francisco Recreation and Parks Department and City Fields Foundation as DEIR project sponsors and consultants.

To avoid possible bias, it is recommended that the committee not include previous DEIR consultants, sponsors and preparers.

Action on Beach Chalet Athletic Fields Renovation

It is recommended that there be no action on the proposed Beach Chalet Athletic Fields Renovation until the new DEIR research is completed; evaluated for validity and reliability; thoroughly vetted and sunshined to the public and until the DEIR proposal is rewritten to include the research analyses, findings and the evaluation of environmental impacts, mitigation measures and alternatives.

It is recommended that the DEIR research be published and made accessible for public review and comments for a minimum of forty days and subsequently be on the agenda of the San Francisco Planning Commission within fifteen days. Written comments to the San Francisco Planning Department be accepted before or within fifteen days after the commission meeting.

Problem Two: People Use and Beach Chalet Project Maintenance

The proposed Beach Chalet project consists of 1/3 FTE maintenance person for year-round maintenance on a continuous basis, Monday through Sunday, 8:00am or 9am to 10:00 pm daily for 365 days, rain or shine. The current Beach Chalet maintenance schedule is the same as the proposed DEIR maintenance schedule.

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The 1/3 maintenance work schedule consists of 13 hours a week, based on a 40 hour work week. The work schedule results in 2.6 hours per day for five days; 1.8 hours per day for seven days. There is no indication in the DEIR that there is vacation, overload or holiday replacement time.

Scope of Beach Chalet Proposal that Effects Maintenance and Environmental Sustainability.

The 1/3 maintenance work schedule has resulted already in highly significant deterioration and degraded environmental impacts. (Refer to DEIR and December 1, 2011 public and commission testimony).

Given the current and proposed scope of the project, the maintenance environmental impact will not be mediated in the proposed Beach Chalet plan, despite plans to install synthetic turf to save maintenance costs.

Increased people use (1.2 million annually) will significantly effect the cumulative daily and annual impact of garbage, trash, debris, wear and tear on the environment. The proposed increased people use will have a highly significant cumulative impact on the environment and its protection and sustainability.

Current and Proposed Scope of the Beach Chalet Project

7.2 acres of field play and 5 acres of additional park land; 2 soccer warm up play areas; pedestrian pathways; special treatment and maintenance of synthetic turf; parking lot; ten 60-foot-tall field lights; 47 15-foot-tall pedestrian pathway lights and 13 18-foot-tall parking lot light; stadium seating for 1,040 daily; 3.5 foot-tall black vinyl fencing around the entire soccer playing field; bathrooms: 11 women's toilet stalls with 6 sinks and 5 men's restroom toilet stalls and 4 urinals with 6 sinks and diaper changing stations; new play structures and BBQ areas with picnic tables; community room; storage and mechanical room. Trash, garbage, debris, wear and tear from 1.2 million annual soccer people, 304,280 annual vehicles (cars, trucks and SUV's), an unknown annual total of people who use the community room, play ground, play structures, picnic and BBQ areas, unknown graffiti removal and consequences of storm and bad weather damage. (DEIR II-13 and Appendix A: Table Four)

Based on commonly accepted soccer league standards and the DEIR documented year-round proposed playing schedules, there will be an astonishingly significant increase in people and their trash, garbage, debris, wear and tear. This significantly negative cumulative environmental impact is exasperated by the long-term cumulative lack of adequate maintenance and repair from prior years.

Recommendations and Research

It is recommended that the current and proposed maintenance plan be revised.

It is recommended that additional maintenance staff be assigned to provide adequate environmental protection and preservation for the current and proposed Beach Chalet project.

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Problem Three: The Lack of a Comprehensive, Coordinated Draft Environmental Impact Report

When you walk from Ocean Beach to the Beach Chalet project, you do not walk through a totally empty land-air space. The Beach Chalet project is not a "stand alone", "isolated" piece of real estate.

Nature doesn't abide by people's rules about zoning or spaces. The proposed environmental impact of 1.2 million people annually does not begin or end at the entrance to the Beach Chalet project. (As the old saying goes, "You can't fool mother nature.")

The Beach Chalet environment is continuously and contiguously linked from the ocean to the beach, the highway and the surrounding park, neighborhoods and businesses areas. The Golden Gate Park and Ocean Beach western edge environment is organically, inorganically and microscopically interconnected, interrelated, interactive and inter-correlated. People use and environmental change or damage in one area impacts all the areas.

The unique micro-climate—salt air, off shore/on shore winds, storms, dense cold drippy fog, sand flows, rain, cloud covers and hot, warm and cold days—is not solely limited to the Beach Chalet's eleven acres.

The inter-connected Ocean Beach and Golden Gate Park western end area is full of people and vehicles with peak people and vehicle use on Saturdays and Sundays.

The question is this. Does the Beach Chalet project's 1.2 million people and 304,280 thousand vehicles annually have significant cumulative environmental impact on nearby ocean, beach, neighborhoods, businesses and park areas. The answer is yes.

Recommendation and Research

1. It is recommended that comprehensive, in-depth and substantive research and analyses of proposed people density and vehicle traffic on nearby beaches, neighborhoods, businesses and park areas, daily and annually, be included in the DEIR proposed plan.

Unexpected Finding from the IPS Study Few Soccer Field Playing Times for Kids

There was an unexpected IPS finding related to children.

"No Kids Allowed" The Proposed DEIR Lacks Significant Soccer Play time for Children

An analysis of the current and proposed DEIR increased playing schedules (DEIR II-11 and II-23) shows that Beach Chalet proposed increased soccer play is scheduled for adults and older teens. The analysis is based on the DEIR and the commonly accepted soccer league standards for age and play.

The soccer playing time for eight years old and under children (U 8) ranges from approximately 45 minutes to 65 minutes. The young kids' proposed team playing time does not fit the after school Monday through Friday extended 90 and 120 minutes playing time or the Saturday and Sunday extended 120 minutes playing time that are

SFRPD reserved time periods for older teens and adult play. (Appendix A, Table 1, Table 2, Table 3, Table 5, Table 6 and Table 7 #1)

It is clear from the analysis that there is almost no appropriate soccer playing time for kids under eight years old (U 8) and minimally appropriate soccer playing time for kids under ten years old (U10) during the school year. The under eight years old (U 8) and the under ten years old (U10) have to compete for extended time blocks of 90 minutes with the U 12 and U 14. As a result of the proposed DEIR, most of the younger players will have to continue to search for soccer play outside of Beach Chalet during the school year, even after the proposed new Beach Chalet soccer complex is built. (Verified by DEIR II-10)

"No kids" must come as a disappointment to the Fisher brothers Bob, Bill and John, whose City Fields Foundation dedicates its work to Giving Every Child a Place to Play Ball. Both the kids and the environment lose in this proposed DEIR.

Because of the testimony and comments made during the San Francisco Planning Commission's Public Hearing on the Draft Environmental Impact Report (December 1, 2011) by some of the commissioners and the public about the unmet demand for children's soccer play time, the actual proposed soccer play time for eight years old and under children (U 8) and ten years old and under children (U 10) at Beach Chalet needs to be researched and sunshined.

Specific Requests

The DEIR indicates that the under eight and under ten kids will not get the playing time they need during the school year. The DEIR schedule cheats the kids out of access to playing time and has a serious impact. In order to meet the demand, it is recommended that the SFRPD soccer playing schedule have designated guaranteed after-school priority reservation time Monday through Friday and designated guaranteed priority reservation time on Saturdays and Sundays for kids eight years old and under and ten years old and under for soccer playing field time.

Background

The DEIR project goals are to increase the playing time at the four Beach Chalet soccer fields to year round play (365 days), Monday through Sunday, 8:00am or 9:00am to 10:00pm, rain or shine. The DEIR proposed goal is to reach 14,320 hours total soccer playing time per year for adults and children. (DEIR II-13,23)

The DEIR soccer playing time schedule does not include warm up time, a commonly accepted soccer league standard.

Seeking Green Report (SPUR)

According to the Seeking Green report (SPUR, July, 2011), the City Fields Foundation, founded by Bob, Bill and John Fisher, has partnered with the city in a \$45 million effort to renovate six soccer fields with an increase of 66,000 hours of soccer play per year for the six soccer fields. This is \$7.5 million per field.

City Fields will sponsor the renovation of the Beach Chalet soccer fields into a Beach Chalet semi-professional soccer stadium complex with stadium fields, lighting and seating—at a cost of \$7.5 million per soccer field: \$30 million for four fields.

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The Beach Chalet Semi-Professional Soccer Stadium Complex will generate an increase of 44,000 hours per year for four-field soccer playing time. For the Beach Chalet complex—with the increase from the current use—the total number of playing hours will exceed 48,700 per year.

There are alarming discrepancies among DEIR, Seeking Green and City Fields reports which need to be addressed and resolved during the DEIR process and before decisions are made about (a) impact, (b) mitigation measures and (c) alternatives.

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Conclusions and Recommendations

The DEIR proposal does not analyze fully or penetrate deeply into the environmental effects of increasing people use. The DEIR is dismissive of environmental impacts on the areas adjacent to the Beach Chalet project. The DEIR does not improve or increase soccer playing time for children under eight years old and children under ten years old during the school year. The DEIR is not comprehensive and thorough.

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The DEIR proposal raises serious, significant questions and problems about the lack of sufficient soccer playing time during the school year for children under eight years old (U 5, 6, 8) and under ten years old (U 10) and environmental impact of people use and traffic use on the Beach Chalet project, Golden Gate Park and surrounding areas.

Specific Research Request and Recommendation

In order to be comprehensive and thorough, there must be in-depth, thorough, comprehensive environmental analyses and planning based on people use and environmental impacts. The October 26, 2011 DEIR proposal lacks significant research on people use to prove that the Beach Chalet project is in fact environmentally protective and will not lead to significant environmental decline, degradation and destruction.

14

Specific Research Request and Recommendation

Thorough and comprehensive research is needed to determine the appropriate and safe times for kids' play during the school year in order to meet the needs of young children. It is recommended that the Beach Chalet soccer playing schedule have designated guaranteed after-school priority reservation time Monday through Friday and designated guaranteed priority reservations on Saturdays and Sundays during the school year for kids eight years old and under and ten years old and under.

15

Recommended Proposed Compromise Combined Mitigation Alternative

The Best for Children and the Environment A Win-Win Solution

I recommend and support a compromise alternative that combines two alternatives: Alternative #2, Off Site Alternative (DEIR pages VI-7-9)) and Alternative #3 Grass Turf with Reduced Lights Alternative (DEIR VI-9-11).

16

Combined Alternatives

Alternative #2: Off-Site Alternative, West Sunset Playground

Renovation of the West Sunset Playground will meet the needs for children under eight (U 5, 6, 8) and children under ten (U 10). The West Sunset Playground will provide safe, accessible, outdoor multiple ball playing athletic fields and facilities for kids. West Sunset Playground has a large soccer field, three baseball diamonds, two tennis courts, a full basketball court, another playground, restrooms and a small recreation center (DEIR VI-7, SFRPD, 2011). It is located near an elementary school and a middle school. It is accessible by public transit and mitigates the use of cars, trucks and SUV's. It has some lighting for evening use already and can provide extended playing time for children after school and during the school year and summer. It can also provide extended playing time for adults and older teens and for those who ride bikes or need public transit.

To ensure soccer playing time for children under eight years old and under ten years old, the West Sunset Playground must have a soccer playing schedule that provides equal age-related access for young children and has designated guaranteed after-school soccer team reservations for Monday through Friday and designated guaranteed soccer team reservations on Saturdays and Sundays for kids, eight years old and under (U 5, 6, 8) and ten years old and under (U 10).

Alternative #3 Grass Turf with Reduced Lights Alternative: Beach Chalet Athletic Fields

With the combined West Sunset Playground and Beach Chalet Athletic Fields, there will be increased playing time available without the added people and traffic congestion at the western end of Golden Gate Park and its adjacent areas. The result: the environmental impact of people use and traffic use on Golden Gate Park and surrounding areas will be less. Alternative #3 combined with Alternative #2, West Sunset Playground will have five soccer playing fields which will provide constant and consistent year-round access and availability for four soccer fields in play. Alternative #3 recognizes and provides for the necessary maintenance required for the current and proposed scope of the Beach Chalet Athletic Fields. The addition of the fifth field allows for proper maintenance time in order to have four fields available for play year round. Alternative #3 combined with Alternative #2 provides the best environmental protection and historic preservation of Golden Gate Park, our beloved park recognized internationally.

A Win-Win for Children and the Environment

The two alternatives (#2 and #3) combined are a win-win for children and the environment. I believe the Fisher brothers, Bob, Bill and John, will be pleased and happy with the win-win outcome to give every child a place to play ball.

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cont.

APPENDIX A

**Initial Preliminary Study (IPS) on impact of Increased Soccer Playing Hours
and People Use and Attendance**

Beach Chalet Soccer Playing Fields

December 4, 2011

Ann Clark, Ph.D.

The initial preliminary study begins to examine the impact of the proposed Beach Chalet increased soccer playing and the environmental effects and impacts of increased people use.

Two sources were used to construct the IPS research model: the DEIR report and commonly accepted soccer league standards.

DEIR: The DEIR proposed soccer play is year round 365 days rain or shine, Monday through Sunday, 8:00am or 9:00am to 10:00pm and includes four fields. (DEIR existing weekly schedules DEIR II-II, Table II-1}, Project Characteristics DEIR II-13, Table II-2} and estimated future weekly schedule {DEIR II-23, Table II-4}.

Commonly Accepted Soccer League Standards: Soccer league standards address age groups, playing time, warm-up time, players, coaches, referees, league staff as well as guidelines for safe weather play. Age groups include U 6, U 8, U 10, U 12, U 14, U 16, U 19 and Adults. (Table 5 and Table 6)

The IPS does not include a people count for the recreational play area and the BBQ areas with picnic tables because the statistics were not available. This is important information and needs to be researched for people use and vehicle use,

The IPS does not include peak play times, play periods or tournaments because the data were not clear. This is significant information and needs to be researched for people use and vehicle use.

1,217,120 people

total annual people use (factored at 355 days a year) (players, coaches, referees, staff, family, friends and spectators; does not include peak play and tournament statistics because statistics are not available; does not include security and first aide and medical emergency staff because statistics are not available. Table 1, Table 2, Table 3, Table 4.)

304,280 vehicles

total annual vehicles to soccer complex (355 days a year) (average four persons per car, truck or SUV; does not include peak play and tournament statistics because statistics are not available, DEIR findings report minimal use of bikes and public transit, Table 4)

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cont.

304,280 vehicles total annual vehicles from soccer complex (355 days) (average four persons per car, truck or SUV; does not include peak play and tournament statistics because statistics are not available. DEIR findings report minimal use of bikes and public transit. Table 4)

608,560 vehicles total annual vehicles that need parking during soccer games (355 days per year) (does not include peak play and tournament statistics because statistics are not available. Saturdays and Sundays have high soccer-related vehicle use that spills over to the environments of John F. Kennedy Drive and adjacent beach, ocean, park, business and neighborhood areas. Table 4)

18,166 hours total annual DEIR proposed soccer playing hours, Factored at 355 days a year with 10 holidays. (DEIR proposed schedule: Monday-Sunday 8:00am or 9:00am to 10:00pm, Factored at 365 days, rain or shine. Does not include warm-up time. The proposed goal in the DEIR report is 14,230 total hours. In the SPUR City Fields report, increase 11,000 hours per field; 44,000 hours for four fields. Table 7 #1, Table 7#2)

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cont.

IPS has two additional findings: maintenance staff work hours (Pages 5 and 6) and kids' appropriate soccer play time hours. (Pages 6 and 7, and Table 1, Table 2, Table 3, Table 5, Table 6, Table 7#1)

For DEIR study descriptions, findings, recommendations and conclusions, see pages 1 through 9 in this report.

For data and information, see the following.

| | |
|-------------|--|
| Table One | Analysis of Proposed Increase of Beach Chalet Soccer Playing Scheduled Hours and People Use: Monday-Friday |
| Table Two | Analysis of Proposed Increase of Beach Chalet Soccer Playing Scheduled Hours and People Use: Saturdays |
| Table Three | Analysis of Proposed Increase of Beach Chalet Soccer Playing Scheduled Hours and Public Use: Sundays |
| Table Four | Analysis of Proposed Increase of Beach Chalet Soccer Playing Scheduled Hours: Total People Use and Vehicle Use Based on Proposed Increase in Schedule Hours. |

| | |
|----------------|---|
| Table Five | Analysis of Proposed Increase of Beach Chalet Soccer Playing Scheduled Hours and Public Use: Common Soccer League Standards for Age Related Playing Time and Pre-game Warm up: U-5 through Adults |
| Table Six | Analysis of Proposed Increase of Beach Chalet Soccer Playing Scheduled Hours and People Use: People Participation and Attendance |
| Table Seven #1 | Analysis of Proposed Increase of Beach Chalet Soccer Playing Scheduled Hours per Field per Day, Monday through Sunday |
| Table Seven #2 | Analysis of Proposed Increase of Beach Chalet Soccer Playing Scheduled Hours Year Round |

Two reports have been submitted to the San Francisco Planning Commission for the public record, public use and sunshine.

Seeking Green

SPUR Report, September, 2011
Approved as SPUR policy by the SPUR
Board of Directors, July 20, 2011

Giving Every Child
A Place to Play Ball

City Fields Foundation 2010

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cont.

Please send a printed copy of the final EIR to

**Ann Clark
2000 Monterey Blvd.
San Francisco, CA 94127**

If you have questions, you may contact Ann Clark at cbofcb@sbcglobal.net
Subject Line; San Francisco Beach Chalet Study: DEIR

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Appendix A

Table One

Analysis of Proposed Increase Beach Chalet Soccer Playing Scheduled Hours and People Use
Monday through Friday

| Proposed Scheduled Hours | Beach Chalet Soccer Playing Time Note: Commonly accepted league soccer play standards are a 30 minute warming time before game. Warming time is not factored in the schedule by DEIR and not included here. | League Playing Time by Age Group | Number of Players, Officials and Spectators One day: two teams per one field | Number of Players, Officials and Spectators One day: Four fields | Number of people annually: factored at 251 days per 355 days DEIR proposed increased stadium seating capacity per game: 1,046 people. |
|--------------------------|--|----------------------------------|--|---|--|
| 9:00am | | | | | DEIR states no requests for |
| 10:00 | | | | | this time period under |
| 11:00 | | | | | current schedule. |
| 12:00pm | | | | | Proposed new schedule |
| 1:00 | | | | | shows 56 people a day. |
| 2:00 | | | | 56 | 14,056 |
| 3:00 | Break | | | | |
| 3:30 | 90 minutes | U 12- 14 | 168 | 672 | 168,672 |
| 5:00 | 90 minutes | U 12 -14 | 168 | 672 | 168,672 |
| 6:30 | 90 minutes | U 12 -14 | 168 | 672 | 168,672 |
| 8:00 | 120 minutes | U 16-19; Adults | 178 | 712 | 178,712 |
| 10:00pm | Close | | | | |
| | | | | Total People Hours (Does not include soccer play warm up time.) | 698,784 people annually |

- Notes: 1. See Table Five for playing time for age groups. See Table Six for numbers of players, officials, and spectators (people use).
 2. DEIR proposed project: semi-professional four soccer field Stadium with stadium lighting, seating, synthetic turf (artificial grass) playing fields and high pole lighting for night and bad weather play.
 3. DEIR proposed goals: To provide maximum soccer time for San Francisco residents and children; year round play, seven days a week, 8:00am or 9:00am to 10:00pm, 365 days a year, rain or shine To provide stadium parking for all vehicles (cars, trucks, SUVs). DEIR states minimum public transit or bike access.
 4. The IPS factors the people count at 355 days a year, allowing for 10 holidays.
 5. Does not include peak play and tournament numbers because adequate statistics are not given in DEIR.

Appendix A
Table Two

Analysis of Proposed Increase of Beach Chalet Soccer Playing Scheduled Hours and People Use
Saturdays

| Proposed Hours Scheduled | Beach Chalet Playing Time Note: Commonly accepted league soccer play standards are a 30 minute warming time before game. Warming time is not factored in the schedule by DEIR and not included here. | League Playing Time by Age Group | Number of Players, Officials and Spectators One day: two teams per one field | Number of Players, Officials and Spectators (Public) One day: Four fields | Factored at 52 days per 355 days annually DEIR Stadium seating capacity per game: 1,046. |
|--------------------------|---|----------------------------------|--|---|--|
| 8:00am | 120 minutes | U 16, 19, Adults | 178 | 712 | 37,024 |
| 10:00 | 120 minutes | U 16, 19 Adults | 178 | 712 | 37,024 |
| 12:00pm | 120 minutes | U 16, 19 Adults | 178 | 712 | 37,024 |
| 2:00 | 120 minutes | U 16, 19 Adults | 178 | 712 | 37,024 |
| 4:00 | 120 minutes | U 16, 19 Adults | 178 | 712 | 37,024 |
| 6:00 | 120 minutes | U 16, 19 Adults | 178 | 712 | 37,024 |
| 8:00 | 120 minutes | U 16, 19 Adults | 178 | 712 | 37,024 |
| 10:00pm | Close | | | | |
| | | | | Total People Hours (Does not include soccer play warm up time.) | 259,168 people annually |

- Notes: 1. See Table Five for playing time for age groups. See Table Six for numbers of players, officials, and spectators (people use).
 2. DEIR proposed project: semi-professional four soccer field Stadium with stadium lighting, seating, synthetic turf (artificial grass) playing fields and high pole lighting for night and bad weather play.
 3. DEIR proposed goals: To provide maximum soccer time for San Francisco residents and children; year round play, seven days a week, 8:00am or 9:00am to 10:00pm, 365 days a year. To provide stadium parking for all vehicles (cars, trucks, SUVs). DEIR states minimum public transit or bike access.
 4. The IPS factors the people count at 355 days a year, allowing for 10 holidays.
 5. Does not include peak playing and tournament numbers because adequate statistics are not given in DEIR.

Appendix A
Table Three

Analysis of Proposed Increase of Beach Chalet Soccer Playing Scheduled Hours and People Use
Sundays

| Proposed Hours Scheduled | Beach Chalet Playing Time Note: Commonly accepted league soccer play standards are a 30 minute warming time before game. Warming time is not factored in the schedule by DEIR and not included here. | League Playing Time by Age Group | Number of Players, Officials and Spectators One day: two teams per one field | Number of Players, Officials and Spectators (Public) One day: Four fields | Number of people 52 days per 355 annually. DEIR Stadium capacity seating per game: 1,046. |
|--------------------------|---|----------------------------------|--|---|--|
| 9:00am | 120 minutes | U 16, 19, Adults | 178 | 712 | 37,024 |
| 11:00 | 120 minutes | U 16, 19 Adults | 178 | 712 | 37,024 |
| 1:00pm | 120 minutes | U 16, 19 Adults | 178 | 712 | 37,024 |
| 3:00 | 120 minutes | U 16, 19 Adults | 178 | 712 | 37,024 |
| 5:00 | 120 minutes | U 16, 19 Adults | 178 | 712 | 37,024 |
| 7:00 | 120 minutes | U 16, 19 Adults | 178 | 712 | 37,024 |
| 9:00 | 60 minutes | U 16, 19 Adults | 178 | 712 | 37,024 |
| 10:00pm | Close | | | | |
| | | | | Total People Hours (Does not include soccer play warm up time.) | 259,168 people annually |

- Notes: 1. See Table Five for playing time for age groups. See Table Six for numbers of players, officials, and spectators (the public).
 2. DEIR proposed project: semi-professional four soccer field Stadium with stadium lighting, seating, synthetic turf (artificial grass) playing fields and high pole lighting for night and bad weather play.
 3. DEIR proposed goals: To provide maximum soccer time for San Francisco residents and children; year round play, seven days a week, 8:00am or 9:00am to 10:00pm, 365 days a year. To provide stadium parking for all vehicles (cars, trucks, SUVs). DEIR states minimum public transit or bike access.
 4. The IPS factors the people count at 355 days a year, allowing for 10 holidays.
 5. Does not include peak playing numbers because adequate statistics are not given in DEIR.

Appendix A
Table Four

Analysis of Proposed Increase of Beach Chalet Soccer Playing Scheduled Hours

Total People Use and Vehicle Use based on Proposed Increase in Schedule Hours

Monday through Sunday

| Beach Chalet Soccer Stadium Proposed People and Vehicle Use Factored at 355 days | Total People Use Factored at 355 days | Total Vehicle Use to the Soccer Complex Factored at 355 days 4 people per car | Total Vehicle Use From the Soccer Complex Factored at 355 days 4 people per car | Total Vehicles Parked during soccer games including pre-game warm-ups. Factored at 355 days |
|---|--|--|--|--|
| Monday- Friday (251 days) | 698,784 people | 174,696 vehicles | 174,696 vehicles | 349,392 vehicles (251 days) |
| Saturday (52 days) | 259,168 people | 64,792 vehicles | 64,792 vehicles | 129,584 vehicles (52 days) |
| Sunday (52 days) | 259,168 people | 64,792 vehicles | 64,792 vehicles | 129,584 vehicles (52 days) |
| Total (355 days) | 1,217,120 people | 304,280 (355 days) | 304,280 vehicles (355 days) | 608,560 vehicles (355 days) |

- Notes:
1. The DEIR states that there will be minimal public transit and bike use to the Beach Chalet project.
 2. Vehicle use is factored on the average of four persons each vehicle (car, truck, SUV).
 3. The DEIR does not factor pre-game warm ups in the schedule. Thirty minute pre-game warm ups are commonly accepted soccer league standards.
 4. Pre-game warm ups have a significant impact on increasing vehicle parking. Except for the first scheduled game, pre-game warming doubles the vehicle parking because pre-game parking takes place during game time.
 5. DEIR proposed project goals: To provide maximum stadium parking in a lot adjacent to the stadium. According to DEIR, the goal is met by increasing parking spaces from 50 to 70 parking spaces.
(70 parking spaces x 6 cars (2.5 hours) per day = 420 parking spaces per day.)

Appendix A

Table Five

Analysis of Proposed Increase of Beach Chalet Soccer Playing Scheduled Hours and People Use

Common Soccer League Standards for Age Related Playing Time and Pre-game Warm-up

U-5 through Adults

Commonly Accepted League Standards for Children, Teenagers and Adults

| Age | Game Time | Half Time | Time-out, injury, penalty, overtime | Pre-game Warm up |
|--------|------------|------------|-------------------------------------|------------------|
| U 5 | 20 minutes | 10 minutes | 15 minutes | 30 minutes |
| U 6 | 20 minutes | 10 minutes | 15 minutes | 30 minutes |
| U 8 | 40 minutes | 10 minutes | 15 minutes | 30 minutes |
| U 10 | 50 minutes | 10 minutes | 15 minutes | 30 minutes |
| U 12 | 60 minutes | 10 minutes | 15 minutes | 30 minutes |
| U 14 | 70 minutes | 10 minutes | 15 minutes | 30 minutes |
| U 16 | 80 minutes | 10 minutes | 15 minutes | 30 minutes |
| U 19 | 90 minutes | 10 minutes | 15 minutes | 30 minutes |
| Adults | 90 minutes | 10 minutes | 15 minutes | 30 minutes |

- Notes:
1. There are two proposed pre-game warm up areas adjacent to the stadium.
 2. Pre-game warm ups are not included in the IPS people use report.
 3. It appears from DEIR soccer game schedules that there is little set-aside time for U 5, 6, and 8 year old soccer players. and minimal set-aside time for U-10 year olds during the school year. These young players will have to search for soccer play elsewhere during the school year.

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Table Six

Analysis of Proposed Increase of Beach Chalet Soccer Playing Scheduled Hours and People Use
People Use, Participation and Attendance

U 6 through Adults

Commonly Accepted League Standards for Players and Officials

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cont.

| | Beach Chalet Soccer U -6 games | Beach Chalet Soccer U -8 games | Beach Chalet Soccer U- 10 games | Beach Chalet Soccer U 12 games | Beach Chalet Soccer U 14 games | Beach Chalet Soccer U -16 games | Beach Chalet Soccer U -19 games | Beach Chalet Soccer Adult Games |
|---|--------------------------------------|--------------------------------------|---------------------------------------|--------------------------------------|--------------------------------------|---------------------------------------|---------------------------------------|---------------------------------------|
| Players | 11 | 11 | 11 | 11 | 11 | 11 | 11 | 11 |
| Substitutes | 4 | 4 | 4 | 5 | 5 | 6 | 6 | 6 |
| Coaches | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 |
| Family, Friends Spectators (estimate) | 30 | 30 | 30 | 64 | 64 | 68 | 68 | 68 |
| Total one Team | 47 | 47 | 47 | 82 | 82 | 87 | 87 | 87 |
| Two Teams | 94 | 94 | 94 | 164 | 164 | 174 | 174 | 174 |
| Referees | 3 | 3 | 3 | 3 | 3 | 3 | 3 | 3 |
| League Official and/or SFRPD staff | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 |
| TOTAL One Game | 98 | 98 | 98 | 168 | 168 | 178 | 178 | 178 |

- Note: 1. Does not include tournament or peak play times because DEIR numbers are not available. Numbers will increase when peak and tournament play times are included.
2. Does not include security or emergency medical staff. Does not include 1/3 FTE maintenance worker.
3. Family/Friends: Factored at 2 for each player and substitute for U 6, U 8 and U10 games.
Factored at 4 for each player and substitute for U 12, U 14, U 16, U 19 and Adult games.
4. DEIR Proposed new stadium: 1,046 seats.

Appendix A

Table Seven #1

Analysis of Proposed Increase of Beach Chalet Soccer Playing Scheduled Hours per Field per Day

Monday through Sunday

| Proposed DEIR Beach Chalet Soccer Schedule Monday-Friday | DEIR Proposed Beach Chalet Soccer Playing Time Monday -Friday Per 1 Field | DEIR Proposed Beach Chalet Soccer Schedule Saturday | DEIR Proposed Beach Chalet Soccer Playing Time Saturday per 1 Field | DEIR Proposed Beach Chalet Soccer Schedule Sunday | DEIR Proposed Beach Chalet Soccer Playing Time Sunday per 1 field |
|---|--|--|---|--|--|
| | Note: Commonly accepted league soccer play standards have a 30 minute warming time before game. Warming time is not factored in the schedule by DEIR and not included here. | | Note: Commonly accepted league soccer play standards have a 30 minute warming time before game. Warming time is not factored in the schedule by DEIR and not included here.. | | Note: Commonly accepted league soccer play standards have a 30 minute warming time before game. Warming time is not factored in the schedule by DEIR and not included here. |
| 9:00am | 60 minutes | 8:00am | 120 minutes | 9:00am | 120 minutes |
| 10:00 | 60 minutes | 10:00 | 120 minutes | 11:00 | 120 minutes |
| 11:00 | 60 minutes | 12:00pm | 120 minutes | 1:00pm | 120 minutes |
| 12:00pm | 60 minutes | 2:00 | 120 minutes | 3:00 | 120 minutes |
| 1:00 | 60 minutes | 4:00 | 120 minutes | 5:00 | 120 minutes |
| 2:00 | 60 minutes | 6:00 | 120 minutes | 7:00 | 120 minutes |
| 3:00 | Break | 8:00 | 120 minutes | 9:00 | 60 minutes |
| 3:30 | 90 minutes | 10:00pm | Close | 10:00pm | Close |
| 5:00 | 90 minutes | | | | |
| 6:30 | 90 minutes | | | | |
| 8:00 | 120 minutes | | | | |
| 10:00pm | Close | | | | |
| Total minutes Per Field Monday- Friday | 750 minutes per 1 field per day | Total minutes Per Field Saturday | 840 minutes per 1 field per day | Total minutes Per field Sunday | 780 minutes per1 field per day |

Appendix A

Table Seven #2

Analysis of Proposed Increase of Beach Chalet Soccer Playing Scheduled Hours Year Round

Monday through Sunday**Total Hours**

| Beach Chalet Soccer Schedule Days | Number of minutes per 1 field per 1 day | Number of hours per 1 field per 1 day (minutes/60) | Number of hours per 4 fields per day (hours x4) | Number of hours year round Monday- Friday 251 days Saturday 52 days Sunday 52 days Total factored on 355 days a year. |
|--|--|---|--|--|
| Monday through Friday | 750 minutes | 12.5 hours | 50 hours | 12,550 hours |
| Saturday | 840 minutes | 14 hours | 56 hours | 2,912 hours |
| Sunday | 780 minutes | 13 hours | 52 hours | 2,704 hours |
| | | | TOTAL | 18,166 hours |

Note: 1. Does not include peak and tournament play times because DEIR numbers are not available. Numbers will increase when peak and tournament play times are included.

2. DEIR proposed total soccer play: 14,320 hours

3. SPUR City Fields proposed total soccer play 11,000 hours per field. 44,000 hours per four fields.

4. DEIR Proposed new stadium: 1,046 seats.

To: Bill Wycko
Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103
bill.wycko@sfgov.org

Cc: Don Lewis
EIR Coordinator
don.lewis@sfgov.org

From: Rupert Clayton
1336 Willard Street
San Francisco, CA 94117
rupert.clayton@gmail.com

Re: Planning Department Case No. 2010.0016E, State Clearinghouse No. 2011022005

Dear Mr. Wycko,

I am writing to comment on the Draft Environmental Impact Report for the Beach Chalet Athletic Fields. The document that follows details some of the many areas where the draft report appears to be deficient.

In my view, the EIR needs substantial amendment in these areas in order to meet the standards of adequacy laid out by the California Environmental Quality Act. This additional research, along with the addition of the fundamentally obvious “compromise alternative”, will necessarily require the planning department to repeat its analysis of many areas. This new analysis should then provide the basis for the department to revise the EIR’s conclusions as to the environmental impact of each alternative and how well each alternative meets the stated objectives. In view of the substantial deficiencies in the draft, any Final EIR that retains broadly the same analyses in these areas, or repeats the existing conclusions without review, will fail the test of adequacy under CEQA.

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Please enter both this letter and the specific comments that follow as formal comments on the Draft EIR. I look forward to reading the department’s responses and reanalysis in the Final EIR.

Sincerely,

Rupert Clayton

Comments on Draft Environmental Impact Report

Beach Chalet Athletic Fields Renovation

EIR Needs to Consider Compromise Alternative

In response to Chapter VI and Executive Summary Section C

Deficient Selection of Project Alternatives

The California Environmental Quality Act (CEQA) requires a draft EIR to “describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives” (CEQA Guidelines Section 15126.6).

The Draft EIR for this project includes the following alternatives: 1) No Project Alternative, 2) Off-Site Alternative, 3) Grass Turf with Reduced Lights Alternative, and 4) Synthetic Turf without Lights Alternative (EIR: Chapter VI). **The draft report does not consider the most obvious way to minimize environmental impacts and better meet project objectives—renovating the grass turf fields at the Beach Chalet without night lighting, and also providing additional hours for soccer play at another location.**

Recommended Components for “Compromise Alternative”

I am recommending this alternative because it has great potential to meet the maximum number of project objectives consistent with minimal environmental impact to Golden Gate Park, the additional site, and the wider environment. Similarly, it aims to balance the genuine need for more playing time and better facilities for youth and adult soccer in San Francisco with the needs of other park users, nearby residents and broader environmental mandates. For these reasons, I will refer to this alternative as the “Compromise Alternative”.

I ask that the EIR include a Compromise Alternative structured generally as follows:

1. **Renovate athletic fields at the West Sunset Playground, including:**
 - An improved playing surface for some or all fields
 - Night lighting for some or all fields
2. **Renovate the Beach Chalet Athletic Fields with living grass turf:**
 - Use contemporary field construction techniques, such as:
 - Good soil structure and soil improvement products for stronger grass roots
 - Effective subsurface drainage to cut down on loss of playing time due to rain
 - State-of-the-art irrigation to both provide full coverage of the fields and to also save water by irrigating only when needed

- New sod
- Gopher barriers and an active gopher-control program
- Fix up restrooms as needed
- Introduce ADA access that is sensitive to the overall design concept of the park and consistent with other meadows in the park
- No sports lighting at the Beach Chalet site
- No expansion of the number of parking spaces (consistent with the requirements of Appendix 41 to the San Francisco Code).
- Only such new or modified pathways as can be accomplished without significant impact to the historic resources in Golden Gate Park
- No bleacher-style raised spectator seating

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Essentially, the aim here is to remove from the Golden Gate Park portion of the project all those elements that cause it to have a significant adverse environmental impact, and then to provide sufficient additional playing hours at the off-site location to meet the sponsor's objectives (without causing significant adverse environmental impact at that location either).

There are two aspects of the Compromise Alternative that could be varied somewhat while retaining essentially the same cores aspects:

- There are many possible locations for the off-site portion of the Compromise Alternative. I **suggest that for ease of comparison, the EIR focuses on the West Sunset Playground for the off-site portion of the compromise alternative.** This location is already considered in the existing Off-Site Alternative, and is located a short distance from the Beach Chalet site. However, the off-site portion of the Compromise Alternative could also be sited elsewhere in the city without greatly changing the analysis. If, for example, there were significant local impacts from development at the West Sunset Playground, then selecting a different location for the off-site alternative could mitigate these. The sponsor's stated objectives include some geographically specific components. Given that the Compromise Alternative includes expanded hours for daytime play at the Beach Chalet site, relocating the off-site portion elsewhere in the city could prove to be even more convenient for adult soccer players seeking evening playing hours.
- While the Compromise Alternative requires a renovated grass surface for the four Beach Chalet fields (to ensure less than significant impact on historical resources), the surfaces for playing fields at the off-site location should be selected based on the most cost-effective approach that meets CEQA guidelines and overall project objectives. The existing grass fields at West Sunset Playground are well maintained and deliver many hours of daytime play. It may be possible to sufficiently increase playing time simply by lighting the existing grass fields and making some surface improvements. Alternatively, it may be necessary to construct one or more artificial turf fields at West Sunset Playground in order to achieve sufficient playing hours to meet objectives.

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Why the Existing Alternatives Alone are Insufficient

Parts of the Compromise Alternative are included as elements of some alternatives in the Draft EIR.

- Alternative 2: Off-Site Alternative (EIR: VI-7 to VI-9) considers an alternative site, but only without renovation of the Beach Chalet site, not in combination.
- Alternative 3: Grass Turf with Reduced Lights Alternative (EIR: VI-9 to VI-12) considers renovated grass turf at the Beach Chalet site, but retains sports lighting and does not include additional renovated fields elsewhere.
- Alternative 4: Synthetic Turf without Lights Alternative (EIR: VI-12 to VI-14) considers not installing sports lighting at the Beach Chalet site, but still includes synthetic turf and does not include additional renovated fields elsewhere.

However, each of the existing alternatives either causes some significant environmental impact, fails to meet the sponsor's stated objectives, or both. This is because each contains some combination of elements that fails in some way. The same is true for the project as proposed, and remains true for the mitigations suggested by the Draft EIR.

For these reasons, it would be wrong to view the Compromise Alternative as simply a restating of portions of these existing alternatives. By combining elements differently, it will reduce environmental impacts, while more successfully meeting the project's goals.

Why the Compromise Alternative Must be Considered

In contrast to the alternatives proposed in the Draft EIR, the Compromise Alternative can reduce environmental impacts to less than significant levels, while meeting the sponsor's objectives. More basically, it can provide great soccer facilities and retain the environmental and cultural value of Golden Gate Park.

Because the major elements of the Compromise Alternative have already been considered within other alternatives, the incremental work required for the Planning Department to research its impacts will be minimal. However, it is only possible for the sponsor, government agencies and city residents to assess the merits of the Compromise Alternative by including it in the EIR as a distinct alternative.

Two other considerations make strong arguments for analyzing the Compromise Alternative.

- Firstly, many people in San Francisco have asked for consideration of the Compromise Alternative. This approach has been presented to the public as an option by the volunteer group SF Ocean Edge, and has received very strong support. More than 3,000 people have signed a petition requesting the key components—renovated grass fields at the Beach Chalet and no night-lighting. Similarly, 10 of 16 candidates in San Francisco's November 2011 mayoral election pledged their support to an alternative with these components. No candidate pledged to support artificial turf or night lighting in Golden Gate Park. To present a Draft EIR that fails to include this alternative is self-evidently inadequate.

- Secondly, there are good reasons to view the Compromise Alternative as more cost-efficient than the proposed project. Cost estimates for the planned project have ranged up to \$12 million. Recently, the city renovated seven grass pitches at the Polo Fields for \$1 million–\$1.3 million. From this we can estimate that renovating the four grass pitches at the Beach Chalet might cost less than \$1 million, plus another \$1 million or less for renovated restrooms, ADA-compliant parking and similar improvements. This leaves a substantial budget of perhaps \$10 million to renovate and light fields at another site. There is good reason to think that the Compromise Alternative can deliver greater benefits than the proposed project, at lower cost, and with far less environmental impact.

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How the Compromise Alternative is Environmentally Superior

The Draft EIR identifies the No Project Alternative and Off-Site Alternative as environmentally superior because they would not cause significant, unavoidable impacts to historical resources from the installation of artificial turf, night lighting, bleachers and new pathways within Golden Gate Park (EIR: Table VI-1). **The Compromise Alternative would qualify as Environmentally Superior** for these same reasons.

07

The Draft EIR identifies no significant environmental impacts in the Off-Site Alternative (EIR: Table VI-1). The Compromise Alternative would have similar or lesser environmental impact at this second site than the Off-Site Alternative presented in the Draft EIR.

How the Compromise Alternative Meets the Project Objectives

The Compromise Alternative would substantially meet all the sponsor's objectives.

- It would increase athletic playing time at the Beach Chalet, through improvements to the grass surface, drainage and gopher controls. It would also increase athletic playing time at the off-site location through both surface improvements and night-lighting.
- The ancillary improvements to the Beach Chalet site would improve public access as stated in the sponsor's objectives. This objective also appears to prejudice acceptable designs by stating a requirement for four specific design elements:
 - New pathways—This requirement can be met through careful design of a limited number of new pathways as recommended by the Draft EIR's cultural resource analysis (EIR: IV.C-23 and Mitigation Measure M-CP-1)
 - Expansion of the parking lot would violate the following provision of Appendix 41 to the San Francisco Code:

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No net gain in parking spaces existing as of the effective date of this ordinance, other than those provided for in the Golden Gate Park Master Plan, shall be permitted.

For this reason, neither the Compromise Alternative nor any other alternative is legally permitted to build additional parking in Golden Gate Park. This objective cannot be met by any legally valid version of the project.

- Providing a formal drop-off area—This requirement can be met.
- Providing bicycle racks—This requirement can be met.
- It would substantially increase ground sports opportunities at two nearby sites in the north-east portion of San Francisco.
- It would provide safe facilities for players and visitors at both sites through gopher-proofing, improved drainage, and state-of-the-art athletic field surfaces. Other amenities would be provided as appropriate to the type of use at each site, and in keeping with the goal of preserving the historic and cultural value of Golden Gate Park.
- Properly constructed grass fields with gopher protection would greatly reduce maintenance and resource needs. The sponsor's view that installation of four artificial turf fields at the Beach Chalet site would necessarily reduce maintenance or resource usage needs to be fully substantiated with independent data. Both field types require responsible maintenance, although the type of work clearly differs.
- ADA requirements would be part of the design for both sites, so this objective would be fully met.
- It will be fully consistent with the *Golden Gate Park Master Plan*.

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cont.

One stated objective remains to be addressed: "Improve safety and increase night-time use of Golden Gate Park by installing new lighting and bringing more recreational facility users to the area". Contained within this are many unsubstantiated assumptions. Here are some of these assumptions and counter-arguments that demonstrate that **this objective is essentially an attempt by the sponsor to unreasonably restrict the range of alternatives under consideration.**

- Assumption: More recreational facility users in the park at night will increase safety. Counter-argument: Simple logic indicates that an area with no night-time use has no crime or safety issues. SFPD statistics show that the areas with most crime and injuries at night are those where most people congregate at night.
- Assumption: Night lighting will increase safety. Counter-argument: While we generally feel safer in well-lit areas at night, there are many studies that show that the link between lighting and safety is far more complex. Clearly night-lighting increases night-use, which increases the potential for crime and injury. Also, bright sports lighting has the effect of obscuring the surrounding dark shadows and facilitating crime in those areas.
- Assumption: Increasing night-time use of the west end of Golden Gate Park is consistent with the *Golden Gate Park Master Plan*. Counter-argument: The master plan states that *Lighting is for safety purposes and is not intended to increase night use.* (GGPMP: 9-5). The Beach Chalet fields are not included in either the night-use areas or potential night-use areas. There is no night use planned at any athletic facility west of Crossover Drive.

09

Therefore, it seems that any alternative that meets the objective as written must necessarily violate both CEQA and the *Golden Gate Park Master Plan*. Despite this, the Compromise Alternative does

Rupert Clayton
December 10, 2011

Page 6

provide an opportunity to improve the safety of both sites (through better design) and night-time use of the off-site location.

09
cont.

Parking Expansion Violates San Francisco Code

In response to Chapter IV Section D and other sections

Parking Analysis Fails to Cite or Analyze Legal Limits in Golden Gate Park

The project proposes to expand the existing 50-car parking lot to add a further 20 parking spaces. However, the provision of parking in Golden Gate Park is legally limited by Appendix 41 to the San Francisco Code. This is the codified version of Proposition J, approved by the city's voters in 1998 as amended by Proposition G, passed in 2005. The relevant section states:

*Upon completion of construction of the Underground Parking Facility, the Authority shall cause one surface parking space within the Park to be permanently eliminated for each space within the Underground Parking Facility. As part of this process, all of the surface spaces in the Concourse, consisting of approximately 200 spaces, shall be eliminated. Priority for elimination of the remaining spaces shall be given to areas of heavy traffic congestion and environmental sensitivity. However, the Authority shall weigh in its decision to eliminate surface spaces the extent to which removal of such remaining spaces could adversely impact, by increasing traffic congestion, neighborhood and neighborhood commercial districts and attempt to avoid such impacts. Surface spaces that are unused because of present or future permanent road closures shall not be counted as spaces that have been permanently eliminated under this paragraph. **No net gain in parking spaces existing as of the effective date of this ordinance, other than those provided for in the Golden Gate Park Master Plan, shall be permitted.***

10

The Golden Gate Park Master Plan contains no provision for expanding parking at the Beach Chalet athletic fields, therefore Appendix 41 does not permit any increase in parking spaces at this site. The EIR must make this restriction clear.

From: Flora Colao [mailto:ffflora@earthlink.net]
Sent: Wednesday, November 23, 2011 1:51 AM
To: bill.wycko@sfgov.org
Cc: SF Ocean Edge
Subject: Beach Chalet Athletic Fields

Dear Mr. Wycko-

As a mother and a grandmother I am writing to protest the proposed project of replacing natural grass in Golden Gate Park with over 7 acres of plastic grass and tire waste.

I am concerned for the following reasons:

1. Artificial grass is made from unsustainable, environmentally unfriendly petrochemical plastic. This is inherently unhealthy for us, for our children, our grandchildren and for the earth. 01
2. Artificial grass leads to nearby trees and plants being deprived of water; 02
3. Artificial grass heats up and adds to ambient temperature. It absorbs sunlight and emits heat. One study found it to be 85% hotter than natural grass. 03
4. We bring children to the park to connect with nature, this project will be destructive to nature. 04
5. Natural grass absorbs carbon dioxide and produces oxygen, artificial grass does not. This impacts our air quality. 05
6. Artificial "grass" removes the microbiology necessary for the sustainability of our native fauna. 06
7. Artificial "grass" does not filter pollutants and, contamination from animal feces and urine. 07
8. Artificial "grass" is not biodegradable making it difficult to dispose of or recycle it and would have to be removed if ever vegetation was to be re-established 08

We have to think about our children, our grandchildren and future generations. We have to think in terms of preserving our parks. Artificial "grass" is not the answer to low rainfall/water restrictions and maintenance issues. The answer lies in water wise plantings and other treatments that are more environmentally friendly and sustainable. We owe it to our children, grandchildren and future generations to preserve nature. Please do not all this project to move forward. 09

Thank you for your time and attention to this matter.

Sincerely,

Flora Colao, LCSW
1549 Treat Ave
San Francisco, CA 94110

I-Colen
NOV 20 2011
CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING
ALLOCATION

Tim Colen
225 Edgehill Way
SF, CA 94127

November 18, 2011

President Christina Olague and Members
San Francisco Planning Commission
1650 Mission Street, 4th Floor
San Francisco, CA 94103

Ref: SUPPORT City Fields DEIR

Dear President Olague and Commission Members,

I am writing as a long-time San Franciscan, parent and former athlete to request that you support adoption of the Draft Environmental Impact Report (DEIR) for the City Field's initiative to renovate the Beach Chalet playing fields. The DEIR is thorough, adequate and accurately addresses the project's environmental impacts.

Decades ago, I played in the City's soccer leagues at Beach Chalet and clearly remember the gopher holes and the poor condition of the fields. Because of the extremely heavy demands placed on them, this is still sadly the case.

Because of my 14-year-old son's deep involvement with baseball over the last six years, my family is all too familiar with the condition of the Department of Recreation and Park's (DRP's) baseball fields. We also have gotten to know a large number of youth baseball families. I regret to say that the boys universally despise San Francisco's public fields because their poor condition means that both fielding and footing are treacherous. This is not a trivial matter when playing with a hard ball. Many of these boys have played baseball on turf fields outside of the City and without exception they prefer them to our own fields.

I recognize that our economic crisis has decimated DRP's budget - this makes proper maintenance of our playing fields difficult. In addition, the heavy demands made by all our sports programs on our limited playing fields make this task almost impossible. The only way to improve the grass fields is to shut them down for extended periods. Then what?

The City Fields proposal is a terrific solution for our City's families. It will ensure that many more San Franciscans have access to good playing fields than would be the case without it.

01

Page Two

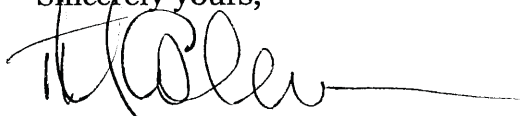
I am stunned that a small minority of folks has been able to stymie an initiative that offers so many benefits to so many families. Access to good quality playing fields is an area where San Francisco is at a big disadvantage compared to the suburbs. Increased access to playing fields would become a factor in helping attract and retain families with children. The City Fields opponents simply have no solution for all those that would be denied the opportunity to play outdoor sports. It is the few shutting out the many.

02

An independent recreation assessment in 2004 found that San Francisco needs 33 more soccer fields and 27 more baseball and softball fields just to meet current demand. We could help meet this demand if City Fields were allowed to renovate the fields at Beach Chalet.

It would be an enormous loss to the City to not take advantage of this opportunity. It is long past time that we renovate Beach Chalet. Please approve the DEIR.

Sincerely yours,



Tim Colen

Cc:

Mayor Ed Lee

San Francisco Board of Supervisors

John Rahaim, Planning Director

Phil Ginsburg, DRP Director

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

Date: Monday, December 12, 2011 12:44PM
Subject: Fw: DEIR regarding the Baech Chalet Fields

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 12/12/2011 12:45 PM -----

"Richard O. Cross"
<rocross@comcast.net>

12/10/2011 05:15 PM

To<bill.wycko@sfgov.org>,
 <donlewis@sfgov.org>
 cc<colague@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>, "Tolu
 Lawrence - Barbary Coast
 Consulting"
 <Lawrence@barcoast.com>

Subject: DEIR regarding the Baech Chalet
 Fields

Dear Members of the Planning Commission:

My name is Richard Cross. I have been a San Francisco resident for over 50 years. I began coaching my children about 35 years ago. For many years, I had the opportunity to coach teams at the Beach Chalet fields.

I cannot count the many injuries my players incurred, some quite serious, over those years. Many times we were unable to practice or play because the fields were rained out or in such bad condition they had to be closed. These closures sometimes lasted for months.

The Beach Chalet fields have been SOCCER fields for the past 70 years. No matter the outcome of the current issue on your table, they will continue to be soccer fields. And, if the turf fields are NOT installed, the condition will never change and the players will continue to have to seek quality playing experiences outside of San Francisco.

Chris Duderstat very convincingly present what will happen again if we do not allow for a more permanent and extended time of play by way of the artificial fields. He presented photos of the fields when they were renovated by Mayor Willie Brown's decree. Then he presented photos of the fields just one year later. They were abysmal and had again been closed for repairs. Without the financial support of the City Fields Foundation, by installing the artificial turf, we will gain nothing. City Fields Foundation certainly doesn't want to fund such a temporary and "doomed to fail" plan. Where will the money come from without City Fields Foundation's help? The city certainly can't afford the renovation and the continual upkeep. So, it will again fall into disrepair.

The plan is to provide over 9500 more hours of play for the player (predominately kids). By staying with grass, that objective will never be met. The grass fields would still need to be reseeded and a rain would close them, just like now.

The city charges from \$25 to \$65 per hour depending on the group (youth, adult, non-profit, etc). If and additional 9500 hours were made available and the city were to charge an average of \$35 per, we could

01

generate an additional \$332,500 per year to put back into maintenance of other park needs.

I encourage you to accept the DEIR as prepared and continue to help the youth of San Francisco

Richard O. Cross, 50 year resident, parent, grandparent, founder of The San Francisco Nighthawk Women Soccer Club

↑
01
cont.

December 10, 2011

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



Dear Mr. Wycko,

Hello. The purpose of this letter is to submit my comments on the draft EIR for the Beach Chalet Athletic Fields project.

The draft EIR states the following: "This environmental impact report (EIR) analyzes potential environmental effects associated with the Beach Chalet Athletic Fields Renovation Project (proposed project or project), which includes various physical and operational changes at the existing Beach Chalet Athletic Fields, an approximately 9.4 acre public sports field facility located at 1500 John F. Kennedy Drive, along the western edge of Golden Gate Park."

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So the key wording above is "analyzes potential environmental effects" – that's what it's supposed to do. This proposed project would be situation in Golden Gate Park so any valid EIR would consider the impact of putting over 300 tons of small oil-based tire particles.

(There's 2 – 3 lbs of tire infill per square foot and approximately 7 acres of field so if you multiply 2 lbs per square foot by 7 acres, you get over 300 tons of tire particles).

A good portion of those particles will sit on or close to the playing surface. Thus strong winds and heavy rain will easy carry those very small tire particles all over the surrounding area – an area that is the ecosystem for that area of the park.

02

Thus any valid EIR would address the impact of those 300 tons of tire particles on the wildlife and ecosystem of the area. But this EIR DOES NOT do this.

03

As it turns out, the tire particles, being oil-based, contain several cancer-causing carcinogens. Thus common sense says that it would not be good to spread 300 tons of such carcinogens into the ecosystem. If the project sponsors think it is okay to do that, then it is up to them to prove that all those hundreds of tons of carcinogen-containing tire particles would do no harm. But they don't and the EIR completely ignores the subject.

04

Carcinogens in the tire particles

The problem with putting oil-based particles in GG Park is that new findings are constantly being made about those particles. In November of 2008, a paper was

published titled, Hazardous chemicals in synthetic turf materials and their bioaccessibility in digestive fluids.

This paper can be found at Pubmed.org – a site run by the NIH if the title is put in. Here is the heading for the paper:

J Expo Sci Environ Epidemiol. **2008** Nov;18(6):600-7. Epub 2008 Aug 27.

Hazardous chemicals in synthetic turf materials and their bioaccessibility in digestive fluids.

Zhang JJ, Han IK, Zhang L, Crain W.

School of Public Health, University of Medicine and Dentistry of New Jersey,
683 Hoes Lane West, Piscataway, New Jersey 08854, USA.

jjzhang@eohsi.rutgers.edu

There one can only read the abstract. I found a link to the whole paper which is here:
<http://www.eastharlempreservation.org/docs/jes200855a.pdf>

This paper finds that the tire infill contains oil-based, cancer-causing ingredients at levels that, if it were in the ground, would require the ground to be dug up. Here's is the abstract from the paper

***** abstract *****

Abstract

Many synthetic turf fields consist of not only artificial grass but also rubber granules that are used as infill. **The public concerns about toxic chemicals possibly contained in either artificial (polyethylene) grass fibers or rubber granules have been escalating** but are based on very limited information available to date. The aim of this research was to obtain data that will help assess potential health risks associated with chemical exposure. In this small-scale study, **we collected seven samples of rubber granules and one sample of artificial grass fiber from synthetic turf fields at different ages of the fields.** We analyzed these samples to determine the contents (maximum concentrations) of polycyclic aromatic hydrocarbons (PAHs) and several metals (Zn, Cr, As, Cd, and Pb). We also analyzed these samples to determine their bioaccessible fractions of PAHs and metals in synthetic digestive fluids including saliva, gastric fluid, and intestinal fluid through a laboratory simulation technique. **Our findings include: (1) rubber granules often, especially when the synthetic turf fields were newer, contained PAHs at levels above health-based soil standards. The levels of PAHs generally appear to decline as the field ages. However, the decay trend may be complicated by adding new rubber granules to compensate for the loss of the material.** (2) PAHs contained in rubber granules had zero or near-zero bioaccessibility in the synthetic digestive fluids. **(3) The zinc contents were found to far exceed the soil limit.** (4) **Except one sample with a**

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cont.

moderate lead content of 53 p.p.m., the other samples had relatively low concentrations of lead (3.12-5.76 p.p.m.), according to soil standards. However, 24.7-44.2% of the lead in the rubber granules was bioaccessible in the synthetic gastric fluid. (5) The artificial grass fiber sample showed a chromium content of 3.93 p.p.m., and 34.6% and 54.0% bioaccessibility of lead in the synthetic gastric and intestinal fluids, respectively.

***** end of abstract *****

Here is a very important excerpt from the paper which can be found at the link above:

***** start of excerpt *****

In the absence of a better set of health-based standards as reference, we compared PAH concentrations in the rubber granule samples to the PAH concentration levels that the

New York State Department of Environmental Conservation (DEC) considers sufficiently hazardous to require the removal from contaminated soil sites (DEC, 2006). Chrysene was found to be above the DEC residential contaminated soil limit of 1.0 p.p.m. in five of the seven rubber granule samples (1, 2, 5, 6, and 8). Dibenzo(a,h)anthracene was also found above the DEC limit of 0.33 p.p.m. in five of the seven samples (1, 2, 5, 6, and 7). Benzo(b)fluoranthene and benzo(k)fluoranthene were each at or above the DEC limit of 1.0 p.p.m. in three samples (1, 2, and 5 for the former

chemical; 1, 2, and 8 for the latter). **Benzo(a)anthracene and benzo(a)pyrene were found to be above their corresponding DEC limits (1.0 p.p.m. for each) in samples 1 and 2. Our findings with respect to the PAHs that appear above or at DEC safety levels are fairly consistent with findings of Plessner and Lund (2004) in Norway, who also conducted a small survey of PAHs in rubber synthetic turf granules. Among all the PAHs**

04
cont.

sampled in various studies, chrysene appears most consistently (Plessner and Lund, 2004; OEHHA, 2007).

All the PAHs that we found at or above the DEC safety limits are known, probable, or possible human carcinogens,

as defined by International Agency for Research on Cancer (IARC, 2006).

***** end of excerpt *****

So the question has to be asked – can birds and wildlife eat toxic oil-based products and not be harmed? Well that was answered in an October 29, 2011 SF Chronicle article. Here's the link to it and the title of it (indented):

<http://www.sfgate.com/cgi-bin/article.cgi?f=/c/a/2011/10/29/MNF91LNMLB.DTL>

Environmentalists hunt wildlife-killing nurdles

By Peter Fimrite, Chronicle Staff Writer

Saturday, October 29, 2011

Here's an excerpt from the paper (indented):

Nurdles are the tiny bits of plastic that are melted down and used in the production of plastic bags, bubble wrap, packaging and wrapping material. They may sound cuddly and nonthreatening, but they are believed to be responsible for the sickness and death of thousands of fish and birds in the region that have mistaken them for food.

04
cont.

Thus it is probable that just like the birds and fish getting sick from eating an oil-based substance, so will the birds and wildlife eating the small tire particles that will inundate the environment surrounding the proposed artificial turf field.

04
cont.

And yet the draft EIR never addressed the incredible damage to the ecosystem of that area of GG Park of putting over 300 tons of oil-based particles.

Thus the draft EIR FAILED in its most basic purpose.

Finally this project violates the Golden Gate Park Master Plan repeatedly and blatantly. Here's just one of many examples I could give. This is directly from the GGPMP: (page 9-5) "**Lighting is for safety purposes and is not intended to increase night use.**"

05

I could list many other examples of it blatantly violating the GGPMP yet the dEIR says little about this.

Please reject this draft EIR.

Thank you,

William Crowley

William Crowley
San Francisco 94121

878-3377 AVE



Bill Wycko/CTYPLN/SFGOV

11/29/2011 05:42 PM

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

cc

bcc

Subject Fw: BEACH CHALET ATHLEIC FIELD ENLARGEMENT.

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 11/29/2011 05:42 PM -----



daley2001@aol.com

11/22/2011 08:56 AM

To bill.wycko@sfgov.org

cc

Subject BEACH CHALET ATHLEIC FIELD ENLARGEMENT.

DEAR MR WYCKO.

I OPPOSE THE ENLARGEMENT OF THIS NATURAL GRASS PLAYING FIELD AT THE GOLDEN GATE BEACH CHALET BECAUSE WE NEED OPEN SPACE MORE THAN DEVELOPMENT AT THE WESTERN EDGE OF GOLDEN GATE PARK. THIS WILD LOCATION WHERE THE LAND MEETS THE SEA IS MORE IMPORTANT FOR THE DISCOVERY ASPECT OF NATURE AT ITS BEST FOR THE CHILDREN AND THE REST OF US INCLUDING THE CREATURES WHO INHABIT ONE OF THE MOST VIBRANT LAND AND SEA SITES IN THE WORLD.

AS WE KNOW THE SAN FRANCISCO PARK AND REC HAS MANY PLAYING FIELDS AROUND SAN FRANCISCO AND SOME ARE NOT IN USE AND CLOSED OFF TO THE PUBLIC. ALSO AUTO PARKING IS LIMITED AT THE OCEAN, AND SO MANY MORE PEOPLE USE THE OCEAN BEACH FOR PARKING AND NIGHT TIME ENTERTAINMENT, BOND FIRES SITES AS PROVIDED BY THE NATIONAL PARK SERVICE !.

ONE LAST COMMENT, UNDER THE GRASS PLAYING FIELD AT THE BEACH CHALET IS A LARGE POOL OF FRESH WATER WHICH SHOWS ITSELF AS GROUND FOG ON COLD AND MOONLIT NIGHTS.

THANK YOU FOR YOUR TIME WITH THIS MATTER. THOMAS DALEY 3595 GEARY BLVD
APT 330, SAN FRANCISCO.CA.

01

02

03



Bill Wycko/CTYPLN/SFGOV
12/05/2011 11:09 AM

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

cc

bcc

Subject Fw: BEACH CHALET ATHLETIC FIELD RESTORATION.

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 12/05/2011 11:09 AM -----



daley2001@aol.com
12/05/2011 07:44 AM

To bill.wycko@sfgov.org

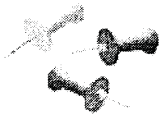
cc

Subject BEACH CHALET ATHLETIC FIELD RESTORATION.

HELLO BILL

THANKS FOR YOUR TIME WITH ALL OF US AT THE THURSDAY LAST MEETING AT CITY HALL
REGARDING THE UPKEEP OF THE BEACH CHALET GRASS PLAYING FIELD HERE IN GOLDEN
GATE PARK. WE KNOW YOU AND THE PARKS COMMISSION WILL MAKE THE RIGHT DECISION
TO MAINTAIN THE PLAYING FIELD AS A NON INTRUSIVE PART OF OUR PARK,(LIKE THE
DECISION WITH THE MOST BEAUTIFUL ROSSI PARK ON ARGUELLO BLVD) . HAPPY
HOLIDAYS, THOMAS DALEY,3595 GEARY BLVD,SAN FRANCISCO,CA.

01



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 05:19 PM -----



Dangelo60
<dangelo60@aol.com>
11/29/2011 09:31 PM

To bill.wycko@sfgov.org

cc sean.elsbernd@sfgov.org, mark.farrell@sfgov.org

Subject YES on 2010.0016E Beach Chalet Athletic Field

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

01

02

RECEIVED

NOV 29 2011

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M E A

November 16, 2011

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

Dear Mr. Wycko:

I strongly oppose any and all obstacles to keeping Golden Gate Park as pristine as possible for the benefit of all visitors. There is no EIR that can account of the destruction of any portion of Golden Gate Park.

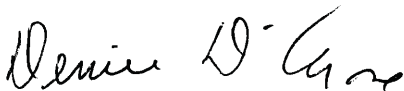
01

I am urging a common sense approach. A park anywhere in the world is meant to mimic nature as much as possible. Artificial turf, a parking lot and night-lights are a contradiction of the purpose of a park.

Please find somewhere else for a soccer field that does not disturb what little wild life is left in Golden Gate Park and most especially does not disturb the overall envelope of nature with its sounds, smells, beauty, biological diversity and tranquility.

02

Sincerely,



Denise D'Anne
351 Guerrero St.
San Francisco, CA 94103

✓cc: SF Ocean Edge
c/o 1243 42nd Avenue
San Francisco, CA 94122

December 7, 2011

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



Dear Mr. Wycko:

I am opposed to the draft EIR for the Beach Chalet Athletic Fields. Much of the previous testimony before your committee has outlined some of the inadequacies of this EIR.

My concern is for the long-term effect on the ecology of the proposed site for this untested design for a soccer field. This soccer field is proposed for a very sensitive area along the beachfront. What effects on animal habits. What effects when sea levels are predicted to rise due to global warming. What effect by taking away an area that could be used for restoring what the designers of Golden Gate Park envisioned, a sylvan escape from the stress of city living.

01

As an aside, why would anyone want to play soccer in an area that is generally foggy and cold? Next they will be demanding overhead heaters along with the overhead lights.

Thanks for your consideration and the hard decisions you will have to make.

Sincerely,

A handwritten signature in black ink that appears to read "Denise D'Anne". The signature is fluid and cursive.

Denise D'Anne
351 Guerrero St.
San Francisco, CA 94103

cc: Ocean Edge
c/o 1243 42nd Avenue
San Francisco, CA 94122

From: **Jacqueline Darrigrand (Google Docs)** <jd154668@gmail.com>

Date: Fri, Dec 9, 2011 at 11:19 AM

Subject: The soccer field (jd154668@gmail.com)

To: jd154668@gmail.com

Cc: bill.wycko@sfgov.org



Attached: Untitled document

Message from jd154668@gmail.com:

As property owning tax paying residents, we want to register our objections to the project.] 01

Google Docs makes it easy to create, store and share online documents, spreadsheets and presentations.

Google docs

-I-Darrigrand & Clafin

Jacqueline Darrigrand & William Clafin
640 4th Ave SF CA 94118
415-627-7246
jd154668@gmail.com

December 9, 2011

Mr. Bill Wycko, ERO
SF Planning Dept.
1650 Mission St. Room 400
San Francisco, CA94118

Dear Mr. Wycko,

We have been alarmed by the DEIR for the Beach Chalet Athletic fields renovation. I support the Comopromise Alternative proposed at the hearing of Dec 1. The DEIR does not satisfy really important questions; mainly for us the awful blaze of light at the site. Without simulation how could developers even know what the impact will be.

How can the planning department permit such a huge pollution by light of a precious natural resource, that is the dark of night by the ocean. Soccer is fine but turning the area into a sports complex with full illumination is an abomination.

Then there are the trees. We bought our condo in order to live by the trees in GGP. Just how many trees will be lost? And the paving of paths--why can't soccer players and their fans walk on unpaved path? NO MORE please.

This is a place where we are allowed to walk on dirt paths. Do not industrialize the west side and call it a cultural plus.

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Even more concerning, is the total impact of the soccer stadium plus the water treatment plan. Why are these not clearly and publicly linked in all public information re: the loss of 50% of the width of the park? It is not just that the soccer plan ignores the uses many of us want to preserve. These two projects will not be lovely--they do not need to be imposed on our park.

We already have parking congestion at Ocean Beach on a nice day. What happens when there are drivers coming in large numbers for games? We do not like the idea of artificial turf--mostly for the expense-- but it is not highly regarded by many environmentalists. Finally, why does this have to be a big expensive undertaking when we are scarcely able to pay our outrageous property taxes and the city is scrambling for money for essential services.

We do not want this project at all but we do support the alternative plan of Dec 1.

Respectfully,
Jacqueline Darrigrand & Willy Clafin

05

06

07



Linda Avery/CTYPLN/SFGOV

12/06/2011 04:39 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 Soccer

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

----- Forwarded by Linda Avery/CTYPLN/SFGOV on 12/06/2011 04:39 PM -----



Evette Davis

<EDavis@bergdavis.com>

12/06/2011 04:27 PM

To "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>
cc "CC:" <linda.avery@sfgov.org>

Subject Beach Chalet Soccer

Dear Commissioners,

I don't usually write letters, but this is a project I know well because my daughter is an active soccer player using all of the fields across the city for her games. I have attached a photo of Stella in her gear -- for those of you who haven't seen her lately, she's a healthy 8-year-old who enjoys playing goalie.

This season we've spent a considerable amount of time at Kimball, which has been a fantastic place to play. We believe this upgrade is a good thing and will benefit many, many people who enjoy sports, not just families with kids. I see no reason why this dilapidated field should be deemed historic or preserved "as is" for any reason. Like our children, these facilities have to grow and change to continue to relate to the world around them.

I hope you will approve the EIR and help create yet another space where people can come together to enjoy athletic activities.

Thank you for your time in advance,
Evette Davis

1364 12th Avenue, SF 94122

01

(415) 385-4863

Evette Davis

BergDavis Public Affairs

150 Post Street

San Francisco, CA 94108

(415) 788-1000 x 201

edavis@bergdavis.com

www.bergdavis.com



october 002.jpg

Fred W. Davis
ad Astra cum Scientia

1427-45th Avenue
San Francisco, California 94122
15 July 2011.

Mr. Don Lewis
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, California 94103

SUBJECT: Case Number 2010.0061R
Beach Chalet Athletic Fields Renovation

Dear Mr. Lewis:

I have recently become aware of this "Renovation" (some might characterize it as a "Desecration") project through the efforts of the Golden Gate Park Preservation Alliance.

01 I write to most vehemently protest this Renovation project as it is currently described in the Environmental Impact Report dated 2 February 2011. Not only does the Report essentially gloss over or ignore the aesthetic and environmental aspects of what amounts to paving over one percent of Golden Gate Park; it ignores or deliberately minimizes crucial technical aspects of the proposal.

02 I am a Chemist, a California veteran, a homeowner, and have lived in the Sunset District close to Golden Gate Park since 1946. Although I have no particular interest in soccer, as such; I frequently use the Ocean Beach end of the Park for hiking, picnicking, nature study and nature photography. The very idea of turning an 11 acre meadow into a formal "Astroturf"-paved "night baseball-lit" sports arena is an obscenity and contrary to everything Golden Gate Park should be! Do you think John McLaren would approve?? Really?? Even if human aesthetics were of no concern; what of the myriads of creatures that live in and use the area? Who has the right to pave over the flowers and the bugs and the birds, and even the gophers, who live there? That sort of world view would clear-cut Muir Woods for the profit, and start Disneyland North in Yosemite Valley!

Technically, I see two glaring errors in the responses given in the Environmental Impact Report. The Report asks, on on page 55:

TOPIC 17: MINERAL AND ENERGY RESOURCES: Would the project:

- c) Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?

03 The response states, in part: "...the project would not, in and of itself, generate a significant demand for energy and a major expansion of power facilities." This answer is nothing more than cruel sophistry; the Project Description, on page 5, states that the proposed 11 acre site will be lit by 600,000 watts of illumination for several hours each day, 365 days per year. Who pays the light bill?? If this level of illumination, and electricity consumption, do not constitute "large amounts of energy ... in a wasteful manner", it is difficult to imagine just what would!

Another technical issue; one potentially even more serious, is the nature of the "synthetic turf", which is stated to be composed of fiber, infill, and backing. The "fiber" and the "backing" are composed of polyethylene and polypropylene. While such polyolefins are made from petroleum, and lack any possible aesthetic appeal, they are not known to be toxic, or any special environmental hazard, in such an application.

04 In contrast, the "infill" is potentially a true environmental hazard. It is stated to "be composed of about 70% styrene butadiene rubber (SBR) and 30% sand. The SBR infill, commonly called 'tire crumb', is recovered from scrap tires and from the tire-retreading process". This statement, while broadly correct, totally ignores the facts that, while the initial rubber might have originally been mostly pure styrene-butadiene polymer, it has necessarily been mixed with various vulcanizing and stabilizing chemicals, some of which are recognized carcinogens, and then vulcanized. The rubber is then "used", with varying and extended exposure to ultra-violet light, ozone, and other unknown environmental influences; and then "reclaimed" by various mechanical and thermal processes. And then, this "infill", some 8.5 acres of it, is to be further exposed to ultra-violet light and natural weathering for some extended length of time. Note I am not saying that persons using such a playing field are of some increased risk of cancer; but I certainly believe that any creature exposed to the leachate - the "run-off" - from such a playing field WOULD be at some increased risk. One might reasonably ask; Why? Why use such a questionable material with its possible concatenation of cancer-causing substances, when the nearly universally used alternative, just plain GRASS, is so readily available? Just because of a few gophers? Some jaded individuals might suspect that there was some hidden profit motive behind such a choice.

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06 [Mr. Lewis, please understand that I am no "Luddite", totally opposed to any change, nor do I have any objection to "improving soccer in Golden Gate Park". But this ill-conceived overblown gargantuan "Restoration Project" is wildly inappropriate for the western end, the "wilderness end", of Golden Gate Park. If for some political reason it had to be built, might I suggest that City Hall Plaza would be a much more fitting location?

Whatever the Planning Department develops for this soccer renovation, I urge you to be guided by the precept: DON'T PAVE THE PARK! Even though the "paving" might be "Astroturf",

Most sincerely,



Fred W. Davis



"Christopher S. Dean"
<christopher@sweetwaterpartners.com>

12/13/2011 11:27 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,
bcc

Subject Beach Chalet Fields

Hello,

I am the parent of 3 kids, 11, 9 and 7 who play both Soccer and Lacrosse on SF fields. We have spent a lot of time at the Crocker Amazon fields and its a great field facility, rain or shine. Converting the beach chalet into a similar facility would be a huge advantage to the children of the city and I am a large supporter.

Is there an additional letter I could send in support for the Beach Chalet Renovation Project?
Please let me know?

Thank you,
Best regards,
CD

Christopher S. Dean

271 28th Ave.

San Francisco, CA 94121

Mobile: + 1.415.505.4454

Skype In + 1.415.666.2716

E-mail: christopher@sweetwaterpartners.com

E-mail: dean.christophers@gmail.com

Skype: deanc2003

Linked In: <http://www.linkedin.com/in/cdean>

About Me: <http://about.me/deansky>

01

From: "John de Forest" <johndeforest@earthlink.net>
To: <bill.wycko@sfgov.org>, <don.lewis@sfgov.org>
cc: <sfoceanedge@earthlink.net>

Date: Sunday, December 11, 2011 09:33PM
Subject: Public comment on EIR re soccer field at Beach Chalet

JOHN de FOREST
2534 Lake Street
San Francisco, CA 94121

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 oppose the project, but support the compromise proposed by the public at the Planning Commission's hearing of December 1, viz., that the Beach Chalet fields be renovated with natural grass and no lighting, and the West Sunset Playground be renovated to provide more hours of play for youth soccer. I urge you to concentrate your attention on that proposal, and thereby find a solution that protects the parkland.

01

I am not persuaded by the EIR that the project would have no "significant" effect on the "scenic resources." Stadium lights near the Beach Chalet would certainly violate the lovely natural atmosphere of the area.

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Nor do I believe that the proposed project "would not have [read "make"] a cumulatively considerable contribution to impacts related to aesthetics." Rather, it would probably encourage future "developers," whether public or private, to inflict unsightly "improvements" upon the area. A large and always vulnerable part of the glory of San Francisco is that it has so many areas that, though built upon, adjoin ones of relatively unspoiled nature. Keep San Francisco beautiful!

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I am not persuaded by the EIR that the project would "impede [wrong word, I think—perhaps "restrict" would be better] the use of wildlife nursery sites." I'm thinking primarily of the birds, and I doubt that the Audubon Society would agree with the EIR in

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this respect.

Sincerely yours,

John de Forest

From: Carlo Grünfeld <uominigrun@yahoo.com>
To: bill.wycko@sfgov.org, don.lewis@sfgov.org
cc: sfoceanedge@earthlink.net

Date: Monday, December 12, 2011 04:05PM
Subject: Beach Chalet proposal

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

Mr. Wycko:

Please consider the compromise proposal to renovate the Beach Chalet Soccer Fields with natural grass turf, and use the artificial turf and lighting at West Portal instead.

The artificial turf and lighting in Golden Gate Park would unfairly deprive many like myself of recreational opportunities such as bird watching, star-gazing, and enjoying the present atmosphere of tranquility.

Thank you very much for your consideration,
Charles Denefeld
resident and registered voter
3820 Lawton Street
SF 94122

(415) 731 9047

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3820 Lawton Street
San Francisco, 94122

10 December, 2011

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

Dear Mr. Wycko:

I earnestly request that the Planning Department modify the recent DEIR concerning the proposed renovations to the Beach Chalet soccer fields in Golden Gate Park.

The artificial turf, lights, and significant structural additions to the area would severely damage the habitat for many local populations of wildlife. For example, raptors rely on rodents and other species that are supported by an environment of natural grass. Owls and other nocturnal animals would be deterred by the immense quantity of artificial, late-evening lighting. Other birds would suffer various stresses to their livelihood as well. As a local citizen who regular enjoys the sighting of wildlife, especially birds, my opportunities for recreation in the western end of the Park would be unfairly and significantly impaired.

In addition, the scale of the proposed project and the powerful, late-evening lighting would negatively impact the quality of life of local residents. The lights would obliterate much of the star gazing in my neighborhood, and detract from its atmosphere of peace and open space. The crowds attracted to the fields in the evenings, especially those from out of San Francisco, would also disrupt the tranquility that local residents currently enjoy.

It seems apparent that a fair balance between preserving the character of the Park and adjacent neighborhoods and providing more athletic opportunities for city-wide residents would consist of a scaled-back renovation which eliminates overwhelming lighting, uses natural turf, and keeps new construction to a minimum. It is unfair and unnecessary to provide facilities that would cater to a sports community from outside of the city. Furthermore, it is well within the budget of the SF Recreation and Park Department to renovate with natural turf.

I very much appreciate your attention in this matter.

Sincerely,

Charles Denefeld

From: Hava Dennenberg [mailto:havadennenberg@yahoo.com]
Sent: Monday, December 12, 2011 10:44 AM
To: bill.wycko@sfgov.org; don.lewis@sfgov.org
Cc: sfoceanedge@earthlink.net
Subject: Letter of Submission: Opposition to Ocean Beach Soccer Turfs

CC: Don Lewis

December 12, 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 was made aware of this issue through a recent article in the SF Guardian and was disturbed to hear about it. I am writing to express my opposition to the proposal to renovate the Beach Chalet Athletic Fields with artificial turf and stadium lights.

Rather than pitting people against wildlife and insisting on seeing this issue from an "all" or "nothing" perspective, I do support a plan that benefits all involved. So often, we get lost in the "we" versus "them" mentality and rush into what seems to be the "easiest" solution to a problem, rather than taking the time to find a solution that benefits all parties involved. It is possible to do the most good, least harm, particularly in an environment such as San Francisco. We're better than caving to an argument as simple as, "Let's do this for the kids".

I am therefore in support of the Compromise Alternative put forth by the public during the Planning Commission hearing of December 1st, 2011. The Compromise Alternative includes a renovation of the Beach Chalet fields; natural grass and no lighting, and renovations to the West Sunset Playground; providing 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.

I am in agreement 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, 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 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?
- 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.
- 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:

- Rec and Park has talked of closing the Park at night -- how will this impact traffic in this area?
- How will having large crowds in this area impact Rec and Park trying to close the Park at night?
- 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?
- What is the impact on the Ocean Beach parking lot of large games at the soccer complex?
- 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?
- 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.
- 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?
- 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

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the current natural grass and if it has artificial turf?

- 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?

Let's do all we can to prevent the loss of precious wildlife habitat in an area designated as the most wild and wooded in the Golden Gate Park Master Plan.

Please let me know that you have received this letter.

Sincerely,

Hava Dennenberg
1585 Waller St
San Francisco, CA 94117

41 Eastwood Drive
San Francisco, CA 94112

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

RECEIVED

DEC 12 2011

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M E A

December 8th 2011

Dear Mr. Wycko:

I attended much of the Planning Commission meeting last Thursday regarding the Beach Chalet Athletic Fields Renovation, but was unable to stay long enough to speak. I have read the executive summary in the "Draft Environmental Impact Report" (DEIR) and extensive segments of the "Biological Impacts" section. As was pointed out at the hearing, the report underestimates the impact of the stadium lighting, as it does not take into account the reflective effect of the often-present fog. The report appears to underestimate the number of birds' nests that would be affected, compared to the Audubon Society's count as reported at the hearing. The DEIR does not make much mention of mammals being affected by the lights and the noise. I have personal experience of the introduction of increased lighting at Crissy Fields by the opening of Planet Granite. Before Planet Granite and its lights (and also increased traffic, both human and automobile) I often saw various larger mammals, coyotes, raccoons, skunks at Crissy Field at night. These sightings dwindled to nothing after Planet Granite's opening. The argument that the animals and birds will go elsewhere in the city ignores the fact that we are pushing on animal habitats from all directions. Every intrusion is an erosion of animal habitat. We have a responsibility to all of the living creatures of the city of St. Francis.

The removal of natural grass removes a significant food source for animals like rabbits and gophers, that are an important part of the food chain in the wilder west end of Golden Gate park. Robins cannot pull earthworms through AstroTurf.

The effect of artificial turf on run-off water quality was eloquently stated at the hearing by Claire Dworsky. This aspect of the DEIR is clearly under assessed.

The value judgments and conclusions that the DEIR makes about "significance" clearly differ from those that I, and many others who attended the hearing, would draw. We value the wild nature of the western part of Golden Gate Park much more than the potential revenue that this more carnival-like sports field might bring in. I believe that the "Grass Turf with Reduced Lighting" is the most reasonable alternative to the artificial turf proposal.

Sincerely,


Annemarie A. Donjacour

I-Draper

From: andrea draper <andreaamericangirl@yahoo.com>
To: "bill.wycko@sfgov.org" <bill.wycko@sfgov.org>, "don.lewis@sfgov.org" <don.lewis@sfgov.org>

Date: Monday, December 12, 2011 08:57AM
Subject: re: Draft EIR- BEACH CHALET ATHLETIC FIELDS RENOVATION

dear sirs- i am writing to you today to let you know that i strongly oppose the beach chalet athletic fields renovation plan that includes artificial turf and stadium lighting. there are many many reasons i oppose this plan, but the most important are; 1)cost- the taxpayers of this city are under so much finacial stress these days- the Compromise Alternative is a much more comfortable plan for San Francisco tax payers. 2)the conservation of nature in the park- cutting down trees and brush, removing many acres of living turf, installing lights that interfere with the owls, coyotes, skunks and other nocturnal animals in Our park is not good for San Francisco. we should be doing everything possible to PRESERVE what we have left! especially the precious few owls and coyotes we have living in Our park who will be drastically affected by lights that will prevent them from being able to see and to keep from being seen, thus causing them to move on or die due to lights wrecking their hunting grounds. we have a whole city in which we can install a soccer complex with nighttime stadium lights- lets not pick one of the only places in the city that has owls and coyotes living in it as the place to put these lights and artificial turf (which these animals prey need as a food source and living quarters!). coyotes and owls are amazing to not have disappeared completely from our city- it is a miracle that they exist at all in golden gate park, that miracle was very graciously bestowed upon us. let's not s*&% on that miracle, ok?

i have been fighting this plan to install lights and artificial turf since i was made aware of it and became a member of San Francisco Ocean Edge in hopes of keeping the athletic fields from being ruined with artificial turf and lights. my boyfriend has been playing soccer at Golden Gate Park for a decade now and so its not like i dont value the soccer players' point of view. he plays at least once a week and sometimes more. it is one of his favorite things in the world and i am for anything that allows him and his soccer buddies to enjoy the park for soccer games even more than they are already enjoying them. in 2006 he even broke his ankle in a gopher hole during a soccer game at the baseball fields (we know- there is supposed to be no soccer playing on the outfield of the baseball fields! i cant keep him and a hundred other players from doing this, sorry) so i am painfully aware of the dangers of a field riddled with gopher holes and what it can do to a person. that is no reason though to install artificial turf. the Compromise Alternative is a perfectly good plan that will fix the gopher hole problem. the polo fields is the example of how this can work without artificial turf.

thank you so much for taking the time to read my letter of concern and for all the hard work you do to serve Our city. Happy Holidays and Best Wishes for an Excellent 2012! yours truley, Andrea Draper

S. Jones I-Duderstadt

COMMENTS ON THE:

BEACH CHALET ATHLETIC FIELDS RENOVATION

Draft Environmental Impact Report

Planning Department Case No. 2010.0016E

This DEIR is lacking in an adequate discussion of the **physical safety of users** of the proposed project. Numerous studies exist showing reduced surface-caused injury when natural grass surfaces are replaced with current synthetic turf. Sadly, these studies only consider quality grass fields, not the rutted gopher-ridden conditions typical of San Francisco's current 'natural' recreationally surfaces.

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With the number of recreational users and available recreational fields in San Francisco, it is not possible to maintain natural grass surfaces in good order.

To argue that the "natural grass" conditions typically found at Beach Chalet for the last 80 plus years are of historic significance is lubricious verging on criminal. Due to surface conditions at Beach Chalet countless youth and adults have suffered injury, some permanently debilitating.

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I personally took an interest in the maintenance of Beach Chalet starting in 1992 with a shovel and wheelbarrow, attempting to fill the numerous holes and ruts my youth faced. As a founding member, and eventually President, of the SF Recreation and Parks Ground Sports Advisory Committee, founded in 1995, I was intimately involved in the restoration of the Polo Field, Garfield, Oceanview, Crocker Amazon, and Beach Chalet between 1996 and 1999. All were restored with intense enrichment of the soils, new irrigations systems, and the placement of the best sod available. They were all then fenced to prevent overuse, and staffed to insure continued maintenance. None survived in good playing condition over 5 years, most only three.

Of greater historic significance are the recently placed high fences that surround our natural grass facilities preventing the traditional open public use of our limited recreational facilities.

03

If the Beach Chalet grounds sports facility is to serve as a location for youth and adults alike to safely run and play than anything less than the proposed A. Project is spiteful to the generations of future users of this facility.

Christopher Duderstadt
1327 10th Ave., SF, CA. 94122
415-661-7527

I-Edelson

From: Ellen Edelson <e.edelson@sbcglobal.net>
To: Don Lewis <don.lewis@sfgov.org>
cc: SF OceanEdge <sfoceanedge@earthlink.net>

Date: Monday, December 12, 2011 05:01PM
Subject: Beach Chalet Athletic Fields Renovation: DEIR Comments

Ellen Edelson
 2207-26th Avenue
 San Francisco, CA 94116

Dec. 12, 2011

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

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

Dear Mr. Wycko,

I strongly oppose the proposal to revovate 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 on December 1, 2011. This Compromise Alternative would renovate the fields with natural grass and no lighting. It would also renovate the West Sunset Playground to provide more hours of play for youth soccer.

I request that the Planning Department focus seriously on this alternative--and work to find a solution that protects the naturalistic aspect of Golden Gate Park.

I agree with the DEIR finding that the proposed project will have an *adverse impact* on the the characteristic features of the Beach Chalet Athletic Fields.

The DEIR is deeply flawed in all other areas.

It does not consider the impact to the plantings, particularly to the trees and

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shrubs, particularly to the west end of the area, by loss of irrigation over the area, as artificial turf requires no irrigation. To remove long-standing irrigation over such a large area will have an adverse impact on the surrounding landscape, likely causing the loss of the trees, particularly on the west end, which the proposal depends on for screening from the elements. This finding was brought to my attention by a highly respected, licensed arborist, who lives and works in San Francisco, who actually helped to plant those very trees years ago.

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cont.

I also have great concerns regarding the following:

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, 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.

04

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

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over 50% of 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?

- 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.
- 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?

Traffic and circulation:

- Rec and Park has talked of closing the Park at night -- how will this impact traffic in this area?
- How will having large crowds in this area impact Rec and Park trying to close the Park at night?
- 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?
- What is the impact on the Ocean Beach parking lot of large games at the soccer complex?
- 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?
- 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.
- What will be the impact on the new bicycle lane that goes by the newly enlarged parking lot entrance?

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?
- 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?
- 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?

- o 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?

19
cont.

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 received this letter.

Sincerely,

Ellen Edelson

Evan Elias

1096 Eddy Street #305

SF, CA 94109

(415)409-6096

December 11, 2011

eeliasmail@yahoo.com

Environmental Review Officer

Beach Chalet Fields Renovation

San Francisco Planning Department

1650 Mission Street, Suite 400

SF, CA 94103

I believe the DEIR for the Beach Chalet Soccer Fields is flawed in its assessment of the impacts on bird habitats and water quality safety in the area of proposed usage.

The DEIR incorrectly asserts that the Western Snowy Plover is absent from the project area, and therefore the impact on them would be low. (p.F-12) The Snowy Plover Protection Area begins at Stairwell 21 on Ocean Beach just 1000 feet to the west of this proposed project, and extends south to Sloat Boulevard. According to the DEIR table, Snowy Plovers are listed as federally protected, and as a California species of special concern. They rest and forage on Ocean Beach, the only suitable habitat in the area, to conserve the energy needed for breeding and migration. The Plover Protection Area is designed to minimize disturbances by dogs and beachgoers.

01

The placement of ten 60 foot stadium lighting lamps within 1000 feet of their resting area, not to mention the loud and raucous fan shouting on possibly multiple soccer fields at once, would undoubtedly affect these endangered shore birds negatively. Ocean Beach and Crissy Field are the only sites in San Francisco that can support Snowy Plover populations. Ocean Beach is far more significant with yearly monitoring numbers between 27-30 birds, while Crissy Field has only 2 or so sightings per year.

The DEIR states clearly that the project will be disruptive to three bird species that are protected under California law. The red-tailed hawk, the red-shouldered hawk, and the Cooper's hawk all use the large tree and open field habitat at the proposed site for nesting and foraging; and all are threatened due to loss very type of habitat. The Golden Gate Audobon Society reconnaissance survey found five active nests within a five mile area of the soccer fields. Two of these nests are Great -Horned Owl nests, another federally protected species, endangered in California. This proposed project will destroy some of the large tree habitat that supports all these species.

02

The DEIR states that the proposed soccer fields will significantly disrupt these threatened bird species in that part of the park, but that this disruption is not important because there is other similar habitat available in other parts of Golden Gate Park. This argument conveniently ignores the reality that dwindling habitat is a key factor the decline of these species. Forcing more birds into a smaller range may cause intra-species competition, and increase stresses that could cause a further decline in the local raptor population.

03

Furthermore the EIR does not take into account the Natural Area Resources Plan of San Francisco's Rec and Park department which is under environmental review at this time. This plan proposes to deforest over 33% of San Francisco's wooded park areas, and replace these prime bird habitats with the small native plants and slow- growing trees common to San Francisco's original sand dunes. If this proposal passes, the amount of large tree habitat suitable for raptors will be radically slashed in San

04

Francisco. In that event the habitat at the present day soccer fields will be absolutely crucial for maintaining the threatened raptor populations in San Francisco.

04
cont.

The DEIR also fails to adequately acknowledge the significance of the impact of bright stadium lights on the essential nightly bird migrations in the Pacific Flyway. As the EIR itself states, bright night lighting is known to disorient nightly bird migrations; cause higher numbers of collisions especially in areas with foggy skies like San Francisco; and disrupt and deter bird usage of nearby habitat for resting. Hundreds of birds and bird species pass through this essential migratory route, which in its present form supplies a safe passage and supportive rest sites. Shielding upward radiance from the lights is not a solution. The effect this project's stadium lighting would have on this critical avian highway is really unknown; what even this EIR makes clear is that it will be negative. And with so many bird species teetering on the edge of endangerment, it is not a reasonable or responsible risk to take in order to increase outside recreation.

05

The leaching of toxic metals into the surrounding area by the proposed astroturf playing surfaces is another significant environmental impact that this report underestimates. According to the authors' own findings the parks in San Francisco that have used astroturf composed with tire crumbs, all have levels of toxic leachate that exceed the acceptable levels. The types of leachate vary depending on the different tire crumbs used to compose the astroturf, but in study after study, they leach. And according to their own studies, the leachate is fatal to aquatic animals. This proposed site with seven acres of leaching astroturf is less than 1000 feet from Ocean Beach. If through excessive flooding any of those metals reached the ocean, it would be an environmental disaster as the poison would likely move up the food chain. The ground around the proposed fields would likely be immediately affected by the toxic leachate. The ground plants, water and bugs would all be rendered deadly to the birds and animals that live in the area. The small ground animals, raccoons, opossums and skunks that use that area for habitat would all be negatively affected, even if the leachate runs into sewers as the project proposes. This astroturf surface is dangerous to wildlife and is completely inappropriate in a park area.

06

This project does not belong in Golden Gate Park. The DEIRs proposed mitigations do not make up for the amount of wild bird habitat loss and degradation that it would cause.

07

Of the alternatives few are appealing. The Offsite project alternative at the West Sunset Playground seems most appealing if the artificial sod requirement is replaced with real grass. There are already two installations of astroturf playing fields in San Francisco, and the studies run by this DEIR show they are both still leaching unacceptable levels of toxic metal contamination into the soil and water. Why even consider poisoning another part of San Francisco?

08

Keeping the Soccer Fields at the Beach Chalet the same size and installing real grass and no lighting or shorter and dimmer lighting might work. But the trees and shrubs need to be retained as they are for bird and animal habitat, in my opinion.

Soccer is very popular nowadays which is wonderful. And soccer has been played on real grass fields, and somehow these fields have been managed all through the history of the sport. Surely we can maintain real grass soccer fields without destroying trees and bird habitat, and poisoning the ground . This project as it stands is a poor use of Golden Gate Park.

09

Nancy Elsner
2275 19th Ave Apt 8
San Francisco, CA 94116-1867

RECEIVED
DEC 13 2011
CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
RECEPTION DESK

Beach Chalet Soccer Fields - Public Comment Due

Written comments due by 5:00 p.m. on December 12, 2011

The Draft Environmental Impact Report (DEIR) for the Beach Chalet Athletic Fields project has been released. This project would replace natural grass in Golden Gate Park with 7 acres of plastic grass and tire waste and install 150,000 watts of 60 foot tall stadium lights next to Ocean Beach. "a substantial adverse change in the significance of a historic resource... (DEIR)"

In November, the Historic Preservation Commission held a public hearing on the DEIR. Soccer enthusiasts from all over Northern California cited examples of poor maintenance of the present grass fields by the Department of Recreation and Park, and asked for a renovated playing field. Local residents talked about their love of Golden Gate Park as a special place in the City and expressed dissatisfaction with the DEIR's inadequate discussion about the loss of wildlife habitat, the loss of a considerable chunk of Golden Gate Park to development, and the impact of the 60 foot stadium light towers on the Park, on Ocean Beach and on views from Sutter Heights.

Chris Patillo, a qualified historic landscape architect who specializes in cultural landscapes, said that she supports soccer play but "... I have reviewed your EIR and I think it inadequately presents alternatives to you. I believe there is an alternative that is a viable alternative that will not obliterate an important cultural landscape."

The Commissioners raised concerns about the impact on Golden Gate Park and encouraged the Planning Department to pursue the alternatives in more detail. Some Commissioners suggested that the Beach Chalet Athletic Fields be renovated with real grass and no night lighting combined with fixing up other playing fields. The goal is to provide more playing time for youth soccer without destroying the historic character, the aesthetic value, and the habitat of the western end of Golden Gate Park.

Send written comments to Mr. Bill Wycko, Environmental Review Officer, SF Planning Department, 1650 Mission St, Ste. 400, SF, CA 94103 or bill.wycko@sfgov.org For info or a copy of the DEIR www.sforceanedge.org

Katherine Howard, ASLA Golden Gate Park Preservation Alliance

*Worried Observer
Dec-Jan. 2011*

*Dear Mr. Wycko - Is what ever
you can to stop this travesty
in Golden Gate Park.*

*Nancy
Elsner*

Ms. Nancy Elsner
2275 19th Ave Apt 8
San Francisco, CA 94116-1867

RECEIVED

DEC 13 2011

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M.E.A.



*Mr. Bill Wycko, Environmental Review Officer
S. F. Planning Department
1650 Mission Street, Ste. 400
San Francisco, CA 94103*

4410341860

COM-368

I-Englander

From: Bill Wycko/CTYPLN/SFGOV
To: Don Lewis/CTYPLN/SFGOV@SFGOV, Sarah B Jones/CTYPLN/SFGOV@SFGOV
Date: Monday, December 12, 2011 04:54PM
Subject: Fw: "Katherine Howard" <sfoceanedge@earthlink.net>; "Suzanne Dumont" <zangsf1@gmail.com>, Eric.l.mar@sfgov.org

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 12/12/2011 04:54 PM -----

Sue Englander
<s3england4@igc.org>

To: Bill Wycko <bill.wycko@sfgov.org>
 cc

Subject: "Katherine Howard"

12/12/2011 01:35 PM

<sfoceanedge@earthlink.net>; "Suzanne Dumont" <zangsf1@gmail.com>, Eric.l.mar@sfgov.org

Please respond to
 Sue Englander
 <s3england4@igc.org>

To: San Francisco Planning Commission c/o Bill Wycko, Environmental Review Officer
 From: Susan Englander

Dear Planning Commissioners,

First of all, thank you for following through with the commission and drafting of the EIR on the Beach Chalet Fields Renovation and the opportunity to comment on the draft EIR. It has been difficult for me to get through the DEIR as thoroughly as I would have wanted since it is not something one would curl up on the couch with in the evening. However, here are my comments on the sections about which I feel most strongly. I disagree with substantial sections of the draft EIR.

As a physically active San Franciscan, I support the proper upgrading and care of the Beach Chalet Fields as a way to promote the healthy life style that most San Franciscans want to promote. Urban life and one with high technology can be a sedentary one and sports such as soccer undercut that tendency to remain sedentary, especially for the city's young people. I emphasize that because some of these so-called improvements are meant to provide increased access to out-of-city adults in leagues. That is not my intention here.

I also support a renovation consistent with the Golden Gate Master Plan and will address this in my remarks. My main concerns are the disruption of the Park's value as a natural recreational area and the impact on the environment: toxin release, water quality reduction and impact on plant, animal and sea life.

I disagree with the finding of the Hydrology and Water Quality sections which report that there will be less than significant impact to water quality in the Park with synthetic turf placement. Crumb rubber used to secure the turf does have toxic materials in it and does have a negative impact on the environment in and of itself. The California Office of Environmental Health Hazard Assessment (OEHHA), in a January 2007 report, found that forty-nine chemicals could be discharged from crumb rubber, some of it highly toxic with neurological and carcinogenic consequences. We are talking about children being exposed to these noxious materials in the name of "fun," as some of the witnesses testified at the December 1 hearing on this DEIR. These materials also have the potential to be released into the soil, endangering animal and plant life. This does not sound like maintaining the natural recreational value of the park, much less its role as a bioresource to the Parks's ecosystems.

01

Based on the above information, I disagree with Impact HZ-1: The proposed project would not create a significant hazard to the public or the environment through routine use, disposal, handling, or emissions of hazardous materials. It seems that there will be hazardous materials released from the crumb rubber alone, much less the plastic turf (one component is polyethylene) and the filler for the turf (one component is polypropylene). These synthetics are currently under investigation for their health consequences and it is probably that food containers made of polypropylene are carcinogenic.

These are my findings after only a partial review of the DEIR. I am now reviewing the alternatives to the proposed renovation laid out in the DEIR and would like an opportunity to comment fully on that as well. I would therefore ask that the public comment period be extended at least 60 days so that I have sufficient time to conduct a full review and do the necessary research for a complete comment.

Thank you again for this opportunity to comment on a topic of great interest to me. I came to Golden Gate Park when I was unemployed 35 years ago and found great pleasure in its many delights, I returned three years ago to help mitigate the effects of receiving chemotherapy for cancer with exercise, and I hope to make more use of Golden Gate Park when I retire. Please help me in making this possible for me and for all San Franciscans. Keep the Park the Park!!

Best,
Susan Englander
3456 17th St.
San Francisco, CA 94110

Cc: sfoceanedge@earthlink.net
zangsfl@gmail.com
Eric.l.mar@sfgov.org

From: ELIZABETH FOREE [<mailto:feforee@yahoo.com>]
Sent: Friday, December 09, 2011 9:40 AM
To: bill.wycko@sfgov.org
Cc: sfoceanedge@earthlink.net
Subject: BEACH CHALET ATHLETIC FIELDS RENOVATION

Dear Mr. Wycko:

My husband & I live on the Great Highway between Noriega/Ortega. You would think we could see stars most nights. Only in winter, right now, looking east can we see stars. Most nights St. Ignatius playing fields are lit up like what is proposed at the west end of GGPark. We also have triplicate traffic lights, both directions, on the upper Great Hwy and street lights. All creating a daytime light effect for both residents and animals to the West.

01

We have owned our house here on the GH since 1986. We started seeing 5 years ago a return of hawks/kites to the large trees along the GH. What happens to the small birds which use trees for nesting and protection if the large trees around the West Sunset playground?

02

I am also concerned that the artificial turf must be replaced after so many years; I have heard 10. This creates another expense, another EIR, etc.

03

What is the reason behind this aggressive push? Is it the schools? I doubt it. Is it the Hispanic soccer community? I doubt it. Is it contractors who will profit? Probably. **I would like a response to my questions so I can go into my community and inform my neighbors.**

I support the Compromise Alternative put forth by the public on Dec 1, 2011.

04

Thank you for your consideration, and please let me know you have received this email.

Sincerely, Elizabeth Foree & Ralph Henson 1878 Great Highway



Linda Avery/CTYPLN/SFGOV

11/22/2011 10:56 AM

To

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

bcc

Subject Fw: Request for an Extension to the Beach Chalet DEIR comment 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

----- Forwarded by Linda Avery/CTYPLN/SFGOV on 11/22/2011 10:55 AM -----



Pierre Fraysse
<pbfgreens@sbcglobal.net>

11/21/2011 09:02 PM

To c_olague@yahoo.com, linda.avery@sfgov.org

cc Kathy Howard <kathyhoward@earthlink.net>

Subject Request for an Extension to the Beach Chalet DEIR comment period

From : Pierre FRAYSSE

**1950 33rd ave
SF, CA, 94116**

Dear Mrs Olague, president of the SF Planning Commission

I am writing you tonight, to ask you to grant an extension to the following DEIR:

- Beach Chalet Athletic Fields, Draft EIR,
- Planning Department Case No. 2010.0016E
- State Clearinghouse No. 2011022005

As you know, many people who oppose this project, have been also intensively involved in the mayoral race, since the incumbent candidate, mayor Ed Lee, had made it clear that balancing the budget was his first priority. And we know that this project is all about the commercialization of the SF GGP to raise more revenue for the city.

Also, please consider the length of the report, the short period of time given for the public to review and understand it, and the technical complexity of this report that requires careful study.

01

Consequently, we ask you to grant this 90 days extension, beyond the current deadline of Dec 12th.

↑
01
|
cont.

Respectfully,

Pierre FRAYSSE

SFGP CC member

San Francisco Green Party Active Members List

To unsubscribe or edit your options, go here:

<https://list.sfgreens.org/cgi-bin/mailman/listinfo/active>

From: Michele Garside <mgarside@comcast.net>
To: Don.Lewis@sfgov.org

Date: Monday, December 12, 2011 10:03PM
Subject: Re: Golden Gate Park

Dear Mr. Lewis,

It has taken me quite a while to read through the DEIR on line, but I have done so. I guess it is a foregone conclusion that the City of SF will move ahead with this plan, and I am only one person who has reservations. I must say, however, that putting phony turf in Golden Gate Park, adding spectator seating and installing lights that will take away the only truly "dark sky" area in our City just to appease sports enthusiasts doesn't preserve our one precious resource one bit. The devastation of the historical significance of the park seems to be enough not to pursue the plan. Humans, adults AND children, need unfettered places to explore and play. Paving over coveted GG Park land in the name of increasing accessibility is simply "doublespeak". For the record, I oppose the proposal.

01

Thank you for your attention.

Michele Garside

On Nov 22, 2011, at 10:23 AM, Don.Lewis@sfgov.org wrote:

> Hello Michele,
>
> You can find the DEIR on line at
> http://sfmea.sfplanning.org/2010.0016E_DEIR.pdf.
>
> If you need all 369 pages of hard copy you need to provide a mailing
> address.
>
> 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
>
>
>
>
> Michele Garside
> <mgarside@comcast
> .net
> > To
> Don.Lewis@sfgov.org
> 11/22/2011
> 10:03 AM cc
>
> Subject
> Golden Gate Park
>

>
>
>
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>
> Dear Mr. Lewis,
> Please send me the Draft Environmental Impact Report for the
> plan to
> pave seven acres of Golden Gate Park with artificial turf and add
> 240,000 watts of stadium lights.
> Thank you, Michele Garside, SF resident.
>
>
>
>
>
> =====
> The Planning Department will have reduced services available the day
> before Thanksgiving and will be closed during the regularly observed
> legal holidays Thursday & Friday November 24-25, 2011. On Wednesday
> November 23rd only the Planning Information Center (PIC), located on
> the 1st floor of 1660 Mission Street, will be open for normal
> business hours.
> Please note that the PIC will have reduced staffing on this day. The
> PIC phone number is (415) 558-6377. The Planning Department
> will resume full services on November 28, 2011.
> =====

RECEIVED AT CITY HEARING 12.1.11
 2010.0016E
 BEACH CHALET
 DBIR
 D. LEWIS

December 1, 2011

Dear Members of the Planning Commission:

I am a father of 3, and a coach for the Riptide Youth Lacrosse club. I attended my first meeting on this subject over 2 years ago. All of the arguments expressed here were made at that time, but despite the obvious citywide support this project was forced into EIR. That EIR process has been painfully long and an expensive use of taxpayer resources, but finally this comprehensive document has concluded the impacts of turfing the fields would be minimal. I urge you - along with a huge number of voting San Franciscans - to not let this project to be delayed any further.

I recognize there is lots emotion around Golden Gate Park, but the bottom line is this space is already dedicated to athletic fields. Over 75 years ago someone decided that one of the many things the park should provide is space for team sports, and they devoted about 1% of the parks acreage to this purpose. It is not one of the many grassy meadows, it is not set aside as part of the serene landscaping of the western edge of the park - this small piece of the park was set aside specifically for field sports and that purpose is its historic value.

01

The reason we are here is that for large parts of the year those fields are closed or in poor condition - and frankly are not capable of fulfilling the original planners' intent. Go out there right now and you will see a chain link fence and a sign that says you can't play. Go out there in February/march when my lacrosse team is assigned to practice at this field and you will see this sign almost 50% of the time.

02

I like a nice grass field as much as the next guy, but in a city with this much demand for field space - even if we had a maintenance budget - the only way to make grass fields viable is to close them for large chunks of time so they can rehab, and then close them again every time there is a substantial rain. That means the field can only be used in certain seasons, and games and practices are regularly cancelled. It happens all the time - even if its sunny outside, if the fields are wet, they are closed and the thousands of kids and adults who use these fields each week are out of luck.

Turfing the beach chalet simply means we will be able to use the space that has already been provided for team sports. In the same way tennis courts in the park need to be hard courts, and in the same way roads through the park need to be paved to meet the demands of city usage, turfing these play fields allows the most people to benefit from the park and all its intended uses. In a city that has a huge shortage of playing fields, has a active and athletic population and has a major problem keeping families in the city - this solution is nothing short of obvious. That's why colleges and communities across the bay area have made the decision to install turf fields - it's a smart use of limited resources.

03

Please take a common sense approach to this decision, approve this project without further delay, and let the beach chalet fields be used for the purpose that was always intended. Play ball.

Sincerely,

Michael Gerrity

E Michael Gerrity
 67 West Clay St
 San Francisco, CA 94121
 mgerrity@pacbell.net
 COM-376

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



December 10, 2011

Re: Beach Chalet Soccer Fields Draft Environmental Impact Report (DEIR) - Public Comments

Dear Mr. Wycko,

In reviewing the DEIR, I notice the DEIR exhibits a number of deficiencies related to the proposed project's lighting impacts, as enumerated below. The DEIR should not be considered complete until these deficiencies are corrected.

- (a) Failure to recognize the significance of the dark-sky resource existing near and along San Francisco's ocean coast. San Francisco is nearly unique among comparably-sized U.S. cities in having a significant dark-sky resource along its ocean coast. This resource is due to several factors in combination: (1) The fact that the dark-sky resource's core areas, namely Sutro Heights Park and Sutro Historic District, are surrounded on 2 sides by dark ocean (most comparable cities are completely surrounded by suburban areas contributing more or less to artificial sky glow), (2) The pattern of urban planning featuring less illuminated residential and commercial areas around the dark-sky resource (most coastal cities have their most illuminated areas along their oceanfront), (3) In the case of Sutro Heights Park, an unobstructed flat horizon of some 270 degrees, and (4) The preservation of Sutro Heights Park and Sutro Historic District parkland free of artificial night lighting (most parkland within close proximity to urban centers includes more or less obtrusive night lighting.) Moreover, the city's dark-sky resource is easily accessible by public transit -- a feature that is probably unique among U.S. cities. In addition, the dark-sky resource currently is, and has for many years been enjoyed by both serious astronomy amateurs as well as the public at large. The DEIR fails to adequately point out and describe this resource and its aesthetic, cultural, and educational value to the people of the Bay Area.
- (b) Failure to recognize the full richness of the southern night views as seen from valuable dark-sky sites to the north of the proposed project location. It should be recognized in considering the proposed project's impact of the dark-sky resource discussed above that the major parklands from which the dark-sky resource can be best enjoyed are located to the *north* of the proposed project, and thus the proposed project lies to the *south* as seen from those parklands. This is particularly problematic and of concern since most of the celestial sphere visible from San Francisco's latitude lies in the *southern* half of the sky, including sections of the lower southern sky (e.g. in the direction of the center of the Milky Way) rich in many readily visible star clusters, nebulae, etc. Moreover, unlike most of the inner Bay Area where much of the low southern sky is heavily light polluted, the low

southern sky (laying largely over ocean) from the point of view of these parklands is comparatively dark and transparent.

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cont.

- (c) Failure to present complete photometric data on field, parking lot, and pedestrian lighting. Although the DEIR provides a diagram of the luminaire proposed for field illumination and seems to assume that such a luminaire emits no uplight, the most cursory glance at that diagram calls this assumption into question. The DEIR fails to provide any independently-measured photometric information (e.g. to at least the level of detail described in Illuminating Engineering Society's TM-15 in terms of zonal lumen distribution) for any of the luminaires to be used in the proposed project *nor for those luminaires' as-installed orientations*. This lack of even the most basic photometric characteristics precludes any real public evaluation of the project's proposed lighting. Remarkably, such a fundamental metric as the number of lumens emitted per fixture appears to be misquoted by the DEIR by a factor of a thousand!
- (d) Failure to include sufficient details about reflectivity characteristics of artificial turf proposed to be installed. Of the total luminous flux emitted by the proposed project into the environment, a very large proportion would likely to be due to reflection of light upward off the field surfaces themselves. Estimating this luminous flux requires accurate information on the reflectivity of the proposed artificial turf(s). Independently-measured reflectivity information on the particular artificial turf(s) proposed for use should be included, but is not.
- (e) Failure to include a rigorous, quantitative, and thorough photometric study of the effect of direct and reflected uplight from the proposed project's lighting on artificial night sky brightness. The DEIR fails to quantitatively model the effect of both direct and reflected uplight on either the zenith night-sky darkness or on the darkness of the low southern night sky, as seen from Sutro Historic District, Sutro Heights Park, and other nearby locations. Such modeling should be based on the latest science of atmospheric scattering, should take into account the angles and spectral power distribution of *all* light emanating from the proposed project (both direct and reflected), and should be done for foggy, cloudy, and clear-sky conditions. Such modeling should predict *and quantify* the actual expected change in artificial sky glow in various parts of the sky as seen from various locations near and around the proposed project resulting from the various alternatives being considered. For example, calculation of the change in artificial night sky brightness on clear nights, as seen from Sutro Heights Park looking in the direction of the proposed project site at 5, 10, 15, 20, 30, 45, 60, and 90 degrees above horizontal should be carried out. The simulated photos presented in the DEIR are neither sufficiently precise nor sufficiently sensitive to estimate the effect of the project's proposed lighting on either clear or cloudy night sky brightness.
- (f) Failure to analyze ecological impacts of re-reflected light off clouds. In addition to direct light and forward-scattered light entering the surrounding ecosystem, during cloudy conditions a very large proportion of the light reflecting upward off field surfaces would strike the cloud bases and be re-reflected into the surrounding environment. Even during clear sky conditions, the sky may be

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expected to be significantly brighter than at present. The effect of likely bright artificial sky glow during (but not limited to) cloudy conditions on the ecology of e.g. insects, birds, mammals, and plant life in the parks, wildlands, and even residential back yards surrounding the proposed project site appears to be basically missing from the DEIR.

05
cont.

- (g) Failure to include description and analysis of a project alternative, characterized by renovation with natural grass and the omission of lighting. During the recent DEIR hearing before the Planning Commission, numerous speakers called for the renovation of the fields with natural grass and the omission of night lighting. Despite mention of several other alternatives in the DEIR, this alternative is not included or analyzed, despite its obvious greatly reduced environmental impact and likelihood to satisfy most project objectives.

06

Sincerely,



David E. Goggin

CC: Kathy Howard, SF Ocean Edge



Linda Avery /CTYPLN/SFGOV

12/07/2011 10:45 AM

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

cc

bcc

Subject Fw: Beach Chalet Renovation - E-mail of Support

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

----- Forwarded by Linda Avery/CTYPLN/SFGOV on 12/07/2011 10:45 AM -----



Jeremy Goldberg

<jergoldberg@gmail.com>

12/07/2011 07:47 AM

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 Beach Chalet Renovation - E-mail of Support

Dear President Olague and members of the Planning Commission:

My name is Jeremy Goldberg. I am a graduate student in Public Affairs at the University of San Francisco. I am here today to express my support for the Beach Chalet Soccer Field Renovation.

I am here because I have experienced firsthand the positive impact that sports, especially soccer, and recreation have had on my life.

I was one of the kids who after school let out went to play recreational or organized sports with my friends. Often we did not have immediate access to safe spaces to play.

01

A renovation like the one Parks & Recreation and City Fields advocate at Beach Chalet would have been warmly welcome by me, my friends and my family.

Why?

Because the renovation will add significant additional hours of playtime, especially as time for recreation and recess is increasingly limited for kids these days.

The opportunity for boys and girls of all backgrounds to play soccer, to learn from each other, from coaches, establishes a greater sense of character, discipline, teamwork and improved mental and physical health.

01
cont.

In today's world kids and youth, the future of our city, often feel overlooked. A limited number of available safe spaces play only reemphasizes this feeling.

As with the previous projects to develop safe spaces for sports and recreation in San Francisco, renovating the Beach Chalet fields is a strong and positive message of support and interest in the growth of kids, families and our shared future.

Therefore, I ask that the Draft Environmental Impact Report be approved

Thank you for your time.

Jeremy M. Goldberg

--

Jeremy M. Goldberg
202.577.6322
my skype: jeremymgoldberg

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--

Jeremy M. Goldberg
202.577.6322
my skype: jeremymgoldberg

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From: Sue Green <sgreen@credomobile.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'" <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>, 'David Thompson' <dt.davidthompson@gmail.com>, 'Sarah Thompson (thompssg@live.unc.edu)' <thompssg@live.unc.edu>, 'Andy Thompson (amt.goyankees@gmail.com)' <amt.goyankees@gmail.com>

Date: Friday, December 09, 2011 05:57PM
Subject: comment on Beach Chalet renovation project

Dear Bill Wycko,

I'm writing to ask the Planning Commission to approve the DEIR for the Beach Chalet renovation project and allow the project to move forward as quickly as possible.

My family resides in Noe Valley. We have two kids, 17 and 19 years old, both of whom have played soccer on the Beach Chalet field and other public fields in the city over the years. Both of my kids are serious athletes who have had to pursue opportunities to play competitive team sports **outside** of the City, partly because San Francisco cannot offer its families the kinds of amenities that suburban communities do with respect to sports facilities. Due to the lack of year-round playing fields, San Francisco supports relatively few recreational and competitive sports teams for a population of its size, negatively impacting kids' health and diminishing opportunities for them to learn the many skills and life lessons that come from participating in team sports. And the athletic clubs that do field teams in San Francisco find it more difficult to build strong and competitive organizations lacking adequate facilities, nor can they host as many regional tournaments as their suburban counterparts, causing the City to miss out on the economic benefit of tournament-related hotel stays, restaurant patronage and additional tourism.

San Francisco needs to diversify the uses of its public park space to support the needs of ALL of its residents and to create a family-friendly urban environment that will stem the flight of families from the City. The Beach Chalet renovation project is a small, critical step in the right direction. Please support this project and allow it to move ahead as quickly as possible.

Thank you,

Susan Green
920 Diamond St
San Francisco, CA 94114

Thomas K. Hahn
863 Waller Street #7
San Francisco, California 94117
(415) 255-6391

December 9, 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 have been a resident of San Francisco since 1989. I strongly oppose the proposal to renovate the Beach Chalet Athletic Fields with artificial turf and stadium lights because it is inconsistent with The Golden Gate Park Master Plan. I support the Compromise Alternative proposed 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:

1. 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:
 - Installation of artificial turf with its human health implications and environmental non-sustainability.
 - The composition of the artificial turf.
 - How the artificial turf will be handled at the end of its life, in 8 to 10 years.
 - How can we be certain 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? 02 03
2. That the soccer field will generate 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. 04 05
3. That the soccer field 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. 06 07

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. 08

Sincerely,

Thomas K. Hahn

Thomas K. Hahn

cc: Mayor Edwin M. Lee, Supervisor Scott Wiener



Bill Wycko/CTYPLN/SFGOV

11/29/2011 03:15 PM

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

Jones/CTYPLN/SFGOV@SFGOV

cc

bcc

Subject Fw: Please don't install synthetic turf and lights at GGP

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 11/29/2011 03:15 PM -----



Bob Hall

<bilgepump100@sbcglobal.net>

11/29/2011 09:53 AM

To bill.wycko@sfgov.org

cc

Subject Please don't install synthetic turf and lights at GGP

I'm pro soccer and pro recreation but the cons outweigh the benefits of installing synthetic turf and lights at Golden Gate Park. Please keep this list of cons in mind as you move forward with a decision that will alter the landscape for years to come:

- Removal of 9 acres of natural grass which provides habitat to birds, butterflies and other wildlife and there is no mitigation proposed. 01
- Installation of 10-60' towers with stadium lighting that will remain on until 10:00pm every night. Artificial lighting has been shown to draw birds off course during migration. This site is within the Pacific Flyway, in Golden Gate Park and 1000 feet from Ocean Beach. 02
- The lighting will negatively impact nesting birds and other species that depend on the area surrounding the soccer fields as habitat. 03
- There is no recycling of the artificial turf plastic and tire crumb rubber, in 8-10 years 400 tons of debris will go to landfill. 04
- It is much less expensive and more environmentally sustainable for the City to restore the natural grass fields. 05
- This is a onetime gift to the City. When the artificial turf fields need to be replaced in 8-10 years where will the millions of dollars come from?

Sincerely,

Robert Hall

1946 Grove St. Apt, 3

San Francisco, CA

94117



Paige Hart
<paigeandandy@gmail.com>
12/07/2011 05:51 PM

To c_olague@yahoo.com, rm@well.com,
wordweaver21@aol.com, plangsf@gmail.com,
mooreurban@aol.com, hs.commish@yahoo.com,
cc

bcc

Subject Please approve the environmental impact report for the
proposed Beach Chalet soccer fields

Dear President Olague and members of the Planning Commission,

I have been a resident of the Inner Richmond for 13 years. During this time I have raised a pair of boy/girl twins in the city. Both are now varsity athletes in college (Amherst/soccer and Yale/rowing) and at many times during their formative years used the soccer fields throughout the city for their soccer games. We were in constant fear of injuries due to poor field conditions and gopher holes at Beach Chalet and the Polo fields. The opening of the Crocker Amazon fields really helped the situation during the High School years.

Our city needs more turf fields like Crocker and Kimball. My husband (who is 50) has played soccer with a group of professional men every Sunday for the last 10 years and really appreciates all the city has done to install the Crocker and Kimball fields.

We need more turf fields with lighting in the city to accommodate all the adults and kids who like to play soccer. With lights, the hours of play can be extended and with turf, we won't have to deal with all the rain outs and gopher holes that we had to negotiate. Great things can result from good accessible fields close to the residents who use them. Without the availability of good fields during their formative years, I'm sure my twins would not have achieved the high level of athletic success they now enjoy.

Please approve this improvement.

Paige Hart
525 10th Ave.
San Francisco, Ca

01

FOR BILL WYCKO —

I-Hemphill

RECEIVED

Comments for the Environmental Review Officer, San Francisco Planning Department
regarding the DEIR for the Beach Chalet Athletic Fields Artificial Turf Project 12/12/11

DEC 12 2011
CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
ME A

Under Hazards, the DEIR for the Beach Chalet Athletic Fields Artificial Turf Project does not address the medical/orthopedic injury and other medical health issues posed by the artificial turf. I submitted various medical article abstracts during the scoping process, but that information was not included in the DEIR or addressed in any way. There is now even more current literature available in the form of more current medical abstracts from pubmed.gov. I have attached the abstracts and from the numbers these can also be retrieved online.

Throughout the hearings, it has constantly been stated by project advocates that artificial turf is safer than grass and this has been used as an argument to push the project forward, stating that installing artificial turf will be an improvement in terms of safety. The example that has usually been given is of an ankle injury. Reviewing the literature, this is not what appears in studies comparing natural grass and artificial turf, and there are injuries that are specific to artificial turf, such as "turf toe", and there appear to be more ankle injuries on the artificial turf than are seen on grass. Artificial turf also can allow the survival of bacteria that can cause infections. The other issue which has not been mentioned is the fact that on a sunny day artificial turf can become very hot.

01

Article 20456680...*Comparison of injuries sustained on artificial turf and grass by male and female elite football players*

"During matches, men were less likely to sustain a quadriceps strain and more likely to sustain an ankle sprain on artificial turf"

Article 21985213...*A review of football injuries on third and fourth generation artificial turfs compared with natural turf*

"There was increased risk of ankle injury playing on artificial turf in eight cohorts." "...artificial turf was very likely to have harmful effects for minor injuries in rugby union training and severe injuries in young female soccer players." "Changing between surfaces may be a precursor for injury in soccer." "Ankle injury prevention strategies must be a priority for athletes who play on artificial turf regularly."

Article 20647952...*The cost of running on natural grass and artificial turf surfaces*

There is a "higher physical effort in matches played on artificial turf". It takes more metabolic effort to run on artificial turf. That combined with a hotter surface threatens heat injury on hot days and we have more of those now.

Article 21306640...*Comparison of the incidence, nature and cause of injuries sustained on dirt field and artificial turf field by amateur football players*

"The most common injury type in the dirt field was skin injuries (abrasion and laceration) and in the artificial turf was sprain and ligament injury followed by hematoma/contusion/bruise. Most injuries were slight and minimal in dirt field cohort but in artificial turf cohort the most injuries were mild." Sprains and ligament injuries are more problematic.

Article 20424406...*Turf toe:soft tissue and osteocartilaginous injury to the first metatarsophalangeal joint*

"The use of artificial turf in the United States has created a dramatic increase in first metatarsophalangeal joint dorsiflexion injuries...In the high performance or elite athlete, a turf toe or severe dorsiflexion injury can be disabling, and can threaten an athlete's career if not treated properly".

Article 20391085...*Risk of injury associated with rugby union played on artificial turf*

"The results indicate that the overall risks of injury on artificial turf are not significantly different from those experienced on grass; however, the difference in the incidence of anterior cruciate ligament injuries on the two surfaces is worthy of further study."

Article 20962684...*Community-associated methicillin-resistant Staphylococcus aureus survival on artificial turf substrates*

"These results suggest that CA-MRSA could survive on artificial turf in significant numbers for 1 week and lower numbers for at least a 1 month, if supplied with appropriate nutrients". This does not happen on natural grass and this problem exists for all body secretions.

In summary, there remain many questions about the safety of artificial turf for athletes, especially young ones, and this needs to be addressed in the DEIR. San Francisco has also failed to maintain many of its natural grass playing fields well. The knowledge to do that is clearly available as demonstrated by the turf at Kezar.

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cont.

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Respectfully submitted,
Pam Hemphill MD

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Scand J Med Sci Sports. 2011 Dec;21(6):824-32. doi: 10.1111/j.1600-0838.2010.01118.x. Epub 2010 Apr 28.

Comparison of injuries sustained on artificial turf and grass by male and female elite football players.

Ekstrand J, Hägglund M, Fuller CW.

Department of Medical and Health Sciences, Linköping University, Linköping, SwedenCentre for Sports Medicine, University of Nottingham, Nottingham, UK.

Abstract

The objective of this study was to compare incidences and patterns of injury for female and male elite teams when playing football on artificial turf and grass. Twenty teams (15 male, 5 female) playing home matches on third-generation artificial turf were followed prospectively; their injury risk when playing on artificial turf pitches was compared with the risk when playing on grass. Individual exposure, injuries (time loss) and injury severity were recorded by the team medical staff. In total, 2105 injuries were recorded during 246 000 h of exposure to football. Seventy-one percent of the injuries were traumatic and 29% overuse injuries. There were no significant differences in the nature of overuse injuries recorded on artificial turf and grass for either men or women. The incidence (injuries/1000 player-hours) of acute (traumatic) injuries did not differ significantly between artificial turf and grass, for men (match 22.4 v 21.7; RR 1.0 (95% CI 0.9-1.2); training 3.5 v 3.5; RR 1.0 (0.8-1.2)) or women [match 14.9 v 12.5; RR 1.2 (0.8-1.8); training 2.9 v 2.8; RR 1.0 (0.6-1.7)]. During matches, men were less likely to sustain a quadriceps strain ($P=0.031$) and more likely to sustain an ankle sprain ($P=0.040$) on artificial turf.

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PMID: 20456680 [PubMed - in process]

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Sports Med. 2011 Nov 1;41(11):903-23. doi: 10.2165/11593190-000000000-00000.

A review of football injuries on third and fourth generation artificial turfs compared with natural turf.

Williams S, Hume PA, Kara S.

Sports Performance Research Institute New Zealand, School of Sport and Recreation, Auckland, New Zealand.

Abstract

Football codes (rugby union, soccer, American football) train and play matches on natural and **artificial** turfs. A review of injuries on different turfs was needed to inform practitioners and sporting bodies on **turf**-related injury mechanisms and risk factors. **Therefore, the aim of this review was to compare the incidence, nature and mechanisms of injuries sustained on newer generation artificial turfs and natural turfs.** Electronic databases were searched using the keywords '**artificial turf**', 'natural **turf**', 'grass' and 'inj*'. Delimitation of 120 articles sourced to those addressing injuries in football codes and those using third and fourth generation **artificial** turfs or natural turfs resulted in 11 experimental papers. These 11 papers provided 20 cohorts that could be assessed using magnitude-based inferences for injury incidence rate ratio calculations pertaining to differences between surfaces. Analysis showed that 16 of the 20 cohorts showed trivial effects for overall incidence rate ratios between surfaces. **There was increased risk of ankle injury playing on artificial turf in eight cohorts**, with incidence rate ratios from 0.7 to 5.2. Evidence concerning risk of knee injuries on the two surfaces was inconsistent, with incidence rate ratios from 0.4 to 2.8. Two cohorts showed beneficial inferences over the 90% likelihood value for effects of **artificial** surface on muscle injuries for soccer players; however, there were also two harmful, four unclear and five trivial inferences across the three football codes. **Inferences relating to injury severity were inconsistent, with the exception that artificial turf was very likely to have harmful effects for minor injuries in rugby union training and severe injuries in young female soccer players.** No clear differences between surfaces were evident in relation to training versus match injuries. Potential mechanisms for differing injury patterns on **artificial turf** compared with natural **turf** include increased peak torque and rotational stiffness properties of shoe-surface interfaces, decreased impact attenuation properties of surfaces, differing foot loading patterns and detrimental physiological responses. **Changing between surfaces may be a precursor for injury in soccer.** In conclusion, studies have provided strong evidence for comparable rates of injury between new generation **artificial** turfs and natural turfs. **An exception is the likely increased risk of ankle injury on third and fourth generation artificial turfs.** **Therefore, ankle injury prevention strategies must be a priority for athletes who play on artificial turf regularly.** Clarification of effects of **artificial** surfaces on muscle and knee injuries are required given inconsistencies in incidence rate ratios depending on the football code, athlete, gender or match versus training.

PMID: 21985213 [PubMed - in process]

PubMed

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J Strength Cond Res. 2011 Mar;25(3):606-11.

The cost of running on natural grass and artificial turf surfaces.

Sassi A, Stefanescu A, Menaspa' P, Bosio A, Riggio M, Rampinini E.

Human Performance Laboratory, MAPEI Sport Research Center, Castellanza, Varese, Italy.
sassi@mapeisport.it

Abstract

The purpose of this study was to evaluate the metabolic cost of running (Cr) on natural grass (NG) and **artificial turf** (AT), compared with a hard surface (HS), that is, asphalted track. Eight amateur soccer players (mean \pm SD: age 22.9 ± 2.3 years, body mass 69.0 ± 4.7 kg, and height 178 ± 5 cm) completed 9 runs (3 surfaces \times 3 speeds, i.e., 2.22, 2.78, 3.33 m·s⁻¹) of 6 minutes, in a random order on the different surfaces. Characteristics of the running surfaces were assessed at 3 points of each running track by measuring shock absorption and standard vertical deformation, via an '**artificial athlete**' device according to FIFA protocol. No significant interactions (2-way ANOVA analysis; $p = 0.38$) were found between running surfaces and running speeds. A significant main effect for surface was found. The average Cr values were 4.02 ± 0.25 J·kg⁻¹·L·m on HS, 4.22 ± 0.35 J·kg⁻¹·L·m on NG, and 4.21 ± 0.31 J·kg⁻¹·L·m on AT. The Cr was also higher at 3.33 m·s⁻¹ compared with the Cr measured at the other 2 running speeds. In conclusion, we found a Cr of ~ 4.20 J·kg⁻¹·L·m on both natural and **artificial** grass football pitches, in accordance with similar percentage shock absorption characteristics of these 2 tested surfaces. Our finding allows a better computation of the Cr on NG and AT, and supports the exclusion of the Cr as a potential factor for the **higher physical effort in matches played on artificial turf**, as reported by soccer players.

PMID: 20647952 [PubMed - indexed for MEDLINE]

Publication Types, MeSH Terms

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Sports Med Arthrosc Rehabil Ther Technol. 2011 Feb 9;3:3.

Comparison of the incidence, nature and cause of injuries sustained on dirt field and artificial turf field by amateur football players.

Kordi R, Hemmati F, Heidarian H, Ziaee V.

The Sports Medicine Research Centre, Tehran University of Medical Sciences, Tehran, Iran.
ramin_kordi@tums.ac.ir.

Abstract

BACKGROUND: Data on the incidence, nature, severity and cause of match football injuries sustained on dirt field are scarce. The objectives of this study was to compare the incidence, nature, severity and cause of match injuries sustained on dirt field and **artificial turf** field by amateur male football players.

METHODS: A prospective two-cohort design was employed. Participants were 252 male football players (mean age 27 years, range 18-43) in 14 teams who participated in a local championship carried on a dirt field and 216 male football players (mean age 28 years, range 17-40) in 12 teams who participated in a local championship carried on a **artificial turf** field in the same zone of the city. Injury definitions and recording procedures were compliant with the international consensus statement for epidemiological studies of injuries in football.

RESULTS: The overall incidence of match injuries for men was 36.9 injuries/1000 player hours on dirt field and 19.5 on **artificial turf** (incidence rate ratio 1.88; 95% CI 1.19-3.05). Most common injured part on dirt field was ankle (26.7%) and on **artificial turf** was knee (24.3%). **The most common injury type in the dirt field was skin injuries (abrasion and laceration) and in the artificial turf was sprain and ligament injury followed by haematoma/contusion/bruise.** Most injuries were acute (**artificial turf** 89%, dirt field 91%) and resulted from player-to-player contact (**artificial turf** 59.2%, dirt field 51.4%). **Most injuries were slight and minimal in dirt field cohort but in artificial turf cohort the most injuries were mild.**

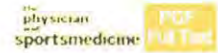
CONCLUSIONS: There were differences in the incidence and type of football match injuries sustained on dirt field and **artificial turf**.

PMID: 21306640 [PubMed] PMCID: PMC3053231 [Free PMC Article](#)[LinkOut - more resources](#)

PubMed

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Phys Sportsmed. 2010 Apr;38(1):91-100.

Turf toe: soft tissue and osteocartilaginous injury to the first metatarsophalangeal joint.

Coughlin MJ, Kemp TJ, Hirose CB.

Clinic at Saint Alphonsus, Boise, ID 83706, USA. footmd@aol.com

Abstract

The use of artificial turf in the United States has created a dramatic increase in first metatarsophalangeal joint dorsiflexion injuries. Turf toe has been reported to occur in athletes who participate in sporting activities. An injury to the plantar capsular ligamentous complex can result in acute and chronic pain, resulting in time lost from sports participation for a short- or long-term period. Classification of this injury is based on clinical findings and imaging studies, including plain radiographs and magnetic resonance imaging. The early recognition of this injury is crucial to successful treatment. Nonoperative treatment may often suffice for incomplete injuries; however, surgery may be warranted for a complete plantar plate disruption or injury to one or both sesamoids. In the high-performance or elite athlete, a turf toe or severe dorsiflexion injury can be disabling, and can threaten an athlete's career if not treated properly.

PMID: 20424406 [PubMed - indexed for MEDLINE]

MeSH Terms

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[View full text](#)[J Sports Sci.](#) 2010 Mar;28(5):563-70.

Risk of injury associated with rugby union played on artificial turf.

[Fuller CW](#), [Clarke L](#), [Molloy MG](#).Centre for Sports Medicine, University of Nottingham, Nottingham, UK.
colin.fuller@nottingham.ac.uk

Abstract

The aim of this study was to compare the incidence, nature, and cause of injuries sustained in rugby union played on **artificial turf** and grass. The study comprised a two-season investigation of match injuries sustained by six teams competing in Hong Kong's Division 1 and training injuries sustained by two teams in the English Premiership. Injury definitions and recording procedures were compliant with the international consensus statement on epidemiological studies of injuries in rugby union. There were no significant differences in the overall incidence (rate ratio = 1.42; $P = 0.134$) or severity ($P = 0.620$) of match injuries sustained on the two surfaces. The lower limb and joint (non-bone)/ligament injuries were the most common location and type of match injury on both surfaces; **the incidence of anterior cruciate ligament injuries was nearly four times higher on artificial turf than grass but the difference was not statistically significant** (rate ratio = 3.82; $P = 0.222$). There were no significant differences in the overall incidence (rate ratio = 1.36; $P = 0.204$) or severity ($P = 0.302$) of training injuries sustained on **artificial turf** and grass. The lower limb and muscle/tendon injuries were the most common location and type of training injury on both surfaces. **The results indicate that the overall risks of injury on artificial turf are not significantly different from those experienced on grass; however, the difference in the incidence of anterior cruciate ligament injuries on the two surfaces is worthy of further study.**

PMID: 20391085 [PubMed - indexed for MEDLINE]

MeSH Terms

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Med Sci Sports Exerc. 2011 May;43(5):779-84.

Community-associated methicillin-resistant Staphylococcus aureus survival on artificial turf substrates.

Waninger KN, Rooney TP, Miller JE, Berberian J, Fujimoto A, Buttaro BA.

Department of Family Medicine and Emergency Medicine, Temple University School of Medicine, Philadelphia, PA, USA. knwaninger@aol.com

Abstract

OBJECTIVE: Artificial turf has been suggested as a risk factor for community-associated methicillin-resistant Staphylococcus aureus (CA-MRSA). This is an experimental study looking at survival of CA-MRSA on **artificial turf**.

METHODS: MRSA strain USA-300-0114 was grown as either planktonic cells or biofilms in liquid cultures of beef heart infusion broth overnight at 37 °C. Beakers containing ProGrass (Pittsburgh, PA) **turf** were inoculated at the dirt interface with either $\sim 5 \times 10^6$ planktonic bacteria or with biofilms. The inoculum included varying nutrient conditions consisting of spent medium, saline, or 5% mucin. The beakers were incubated at 37 °C in ambient air. The main outcome measure was the number of surviving colony-forming units determined by plating on mannitol salt agar.

RESULTS: Survival was biphasic with a colony-forming unit drop from $\sim 5 \times 10^6$ to $\sim 5 \times 10^4$ after the first week followed by survival of between 10^3 and 10^4 bacteria until termination of the experiment (20-50 d). Survival was dependent on nutrients, and washed cells survived less than 1 d. Mucin could serve as a nutrient source and slightly increased surviving numbers to 10^3 - 10^4 bacteria. Biofilm formation did not influence survival.

CONCLUSIONS: CA-MRSA survivability on **artificial turf** surfaces is dependent on the availability of nutrients. These results suggest that CA-MRSA could survive on **artificial turf** in significant numbers for 1 wk, and lower numbers for at least 1 month, if supplied with appropriate nutrients. Outdoor environmental conditions may affect these findings.

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PMID: 20962684 [PubMed - indexed for MEDLINE]

Publication Types, MeSH Terms, Substances**LinkOut - more resources**



Linda Avery /CTYPLN/SFGOV

12/08/2011 08:25 PM

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

cc

bcc

Subject Fw: Beach Chalet

Linda D. Avery-Herbert

Director of Commission Affairs

SAN FRANCISCO PLANNING COMMISSION &

SAN FRANCISCO HISTORIC PRESERVATION COMMISSION

1650 MISSION STREET – SUITE 400

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WEBSITE: www.sfgov.org/planning

----- Forwarded by Linda Avery/CTYPLN/SFGOV on 12/08/2011 08:25 PM -----



"Tom, Tom, Tom, Tom Hicks, Hicks, Hicks,
Hicks" <tomtomhickshicks@yahoo.com>

12/08/2011 10:21 AM

To bill.wycko@sfgov.org, don.lewis@sfgov.org

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Subject Beach Chalet

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I support the renovation of the Beach Chalet soccer fields. I am a player and coach in the city and the facility truly needs to be modernized. As a resident and homeowner (who is in the process of paying property taxes) in the Outer Richmond, my only concern is the lighting that will be installed and the hours of use. We do need lighting, however the pitches could be closed at 8 to allow those of us who live out here an opportunity to enjoy our neighborhood (and our view) in a more natural setting.

Regards-

Tom Hicks

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