

APPENDIX COM

Comment Letters and Emails

This appendix contains copies of all written comments received on the Draft EIR, including comments submitted either by letter, fax, or email. Transcripts of oral comments presented at the public hearing on the Draft EIR are included in a separate appendix, Appendix PH.

Written comments are grouped under one of three categories: public agencies, non-governmental organization, or individuals. Tables summarizing all of the commenters in each of these three categories are presented in Chapter IX of the Comments and Responses document. Within each category, commenters are organized in alphabetical order by code.

To facilitate the commenter in locating the responses to his or her comments, the EIR assigns a unique commenter code plus one or more topic code to each individual comment, as explained below. The commenter code is shown at the top of each page with individual comment numbers shown in the margin of each written comment. **Table COM-1** (located following the section on Comment Codes, below) indicates each commenter code, comment number, and the topic code assigned to each comment. This information serves as the cross-reference guide for the commenter and topic codes.

Commenter Codes

This document assigns a code to each comment letter, email, comment card, and public hearing transcript based on the name of the agency, organization, or individual submitting the comment. Comments submitted by mail, email, facsimile, comment card, or orally at the public hearing (as transcribed in the official public hearing transcript) are all coded and numbered the same way. Each commenter code has three parts. It begins with a prefix indicating whether the commenter is from a public agency (A) or non-governmental organization (O) or is an individual (I). This is followed by a hyphen and the acronym of the agency or organization, or the individual's last name. The third part of the code is the sequential numbering of individual comments within a letter or email that represents a distinct topic. The first two parts of the commenter codes is shown in bold at the top of each page of every written comment, and the third part is shown in the margin along side the individual bracketed comment. Only substantive comments received on the Draft EIR are bracketed; for example, comments that describe an agency's or organization's mission or that reiterate or quote sections of the EIR are not bracketed.

As an example of the commenter coding system, the comment letter, the letter from the San Francisco Public Utilities Commission is coded A-SFPUC, and the first comment in the letter is

coded A-SFPUC-01, the second comment on a different topic is coded A-SFPUC-02, etc. If a single agency, organization, or individual submitted comments more than once (or spoke at the public hearing in addition to submitting written comments), a number is inserted at the end of the identifying initials. For example, if the San Francisco Public Utilities Commission submitted comments both at the public hearing and in a letter; the first comment set is coded as A-SFPUC1, and the second set is A-SFPUC2; the subsequent sequential numbers denote the individual comments from that commenter (e.g., A-SFPUC1-01, A-SFPUC1-02, A-SFPUC1-03, etc.)

Topic Codes

The prefixes for the topic codes used in the organization of Chapter X, Responses to Comments, are shown below:

X.B	General Comments [GC]	X.J	Transportation and Circulation [TR]
X.C	Environmental Review Process [ERP]	X.K	Recreation [RE]
X.D	Project Description [PD]	X.L	Biological Resources [BIO]
X.E	Plans and Policies [PP]	X.M	Hydrology and Water Quality [HYD]
X.F	Environmental Setting and Impacts [ESI]	X.N	Hazards and Hazardous Materials and Air Quality [HAZ]
X.G	Land Use [LU]	X.O	Alternatives [ALT]
X.H	Aesthetics [AE]		
X.I	Cultural Resources [CR]		

Within each section of this chapter under each topic area, similar comments are grouped together and numbered sequentially using the topic code prefix and sequential numbering for each subtopic. For example, General Comments [GC] are listed as [GC-1], [GC-2], [GC-3], and so on. Within each topic code and corresponding heading that introduces the comment subject, there are quotes of comments, including the commenter name and a unique comment code that identifies the commenter.

**TABLE COM-1
COMMENTER CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS**

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Agencies</i>				
A-CSCH	California State Clearinghouse	letter	A-CSCH-01	ERP-1
A-NPS	National Park Service	letter	A-NPS-01	AE-2
A-NPS	National Park Service	letter	A-NPS-02	PP-4
A-NPS	National Park Service	letter	A-NPS-03	LU-1
A-NPS	National Park Service	letter	A-NPS-04	BIO-1
A-NPS	National Park Service	letter	A-NPS-05	ERP-3
A-NPS	National Park Service	letter	A-NPS-06	AE-2
A-NPS	National Park Service	letter	A-NPS-07	AE-2
A-NPS	National Park Service	letter	A-NPS-08	AE-2
A-NPS	National Park Service	letter	A-NPS-09	AE-2
A-NPS	National Park Service	letter	A-NPS-10	AE-2
A-NPS	National Park Service	letter	A-NPS-11	BIO-1, BIO-4
A-NPS	National Park Service	letter	A-NPS-12	BIO-1, BIO- 3, BIO-4
A-NPS	National Park Service	letter	A-NPS-13	BIO-4
A-SFPC-Antonini	San Francisco Planning Commission	public hearing comments	A-SFPC-Antonini-01	ALT-3, ALT-5
A-SFPC-Antonini	San Francisco Planning Commission	public hearing comments	A-SFPC-Antonini-02	ALT-2
A-SFPC-Antonini	San Francisco Planning Commission	public hearing comments	A-SFPC-Antonini-03	ALT-2
A-SFPC-Antonini	San Francisco Planning Commission	public hearing comments	A-SFPC-Antonini-04	ALT-1, PD-2, PD-4
A-SFPC-Antonini	San Francisco Planning Commission	public hearing comments	A-SFPC-Antonini-05	AE-2
A-SFPC-Antonini	San Francisco Planning Commission	public hearing comments	A-SFPC-Antonini-06	BIO-4
A-SFPC-Antonini	San Francisco Planning Commission	public hearing comments	A-SFPC-Antonini-07	ALT-3
A-SFPC-Antonini	San Francisco Planning Commission	public hearing comments	A-SFPC-Antonini-08	TR-3
A-SFPC-Antonini	San Francisco Planning Commission	public hearing comments	A-SFPC-Antonini-09	AE-2
A-SFPC-Antonini	San Francisco Planning Commission	public hearing comments	A-SFPC-Antonini-10	BIO-2
A-SFPC-Antonini	San Francisco Planning Commission	public hearing comments	A-SFPC-Antonini-11	PD-2
A-SFPC-Antonini	San Francisco Planning Commission	public hearing comments	A-SFPC-Antonini-12	PD-4

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Agencies (cont.)</i>				
A-SFPC-Antonini	San Francisco Planning Commission	public hearing comments	A-SFPC-Antonini-13	ESI-2, ERP-1
A-SFPC-Antonini	San Francisco Planning Commission	public hearing comments	A-SFPC-Antonini-14	ALT-2
A-SFPC-Borden	San Francisco Planning Commission	public hearing comments	A-SFPC-Borden-01	HAZ-4
A-SFPC-Borden	San Francisco Planning Commission	public hearing comments	A-SFPC-Borden-02	GC-2
A-SFPC-Borden	San Francisco Planning Commission	public hearing comments	A-SFPC-Borden-03	ALT-3
A-SFPC-Borden	San Francisco Planning Commission	public hearing comments	A-SFPC-Borden-04	AE-2, ESI-2
A-SFPC-Fong	San Francisco Planning Commission	public hearing comments	A-SFPC-Fong-01	PD-2
A-SFPC-Miguel	San Francisco Planning Commission	public hearing comments	A-SFPC-Miguel-01	CR-1
A-SFPC-Miguel	San Francisco Planning Commission	public hearing comments	A-SFPC-Miguel-02	PP-2
A-SFPC-Miguel	San Francisco Planning Commission	public hearing comments	A-SFPC-Miguel-03	TR-3
A-SFPC-Miguel	San Francisco Planning Commission	public hearing comments	A-SFPC-Miguel-04	PD-4
A-SFPC-Moore	San Francisco Planning Commission	public hearing comments	A-SFPC-Moore-01	HAZ-1
A-SFPC-Moore	San Francisco Planning Commission	public hearing comments	A-SFPC-Moore-02	LU-1
A-SFPC-Moore	San Francisco Planning Commission	public hearing comments	A-SFPC-Moore-03	ALT-2
A-SFPC-Moore	San Francisco Planning Commission	public hearing comments	A-SFPC-Moore-04	ERP-1, PP-3
A-SFPC-Moore	San Francisco Planning Commission	public hearing comments	A-SFPC-Moore-05	ERP-1
A-SFPC-Olague	San Francisco Planning Commission	public hearing comments	A-SFPC-Olague-01	ERP-1
A-SFPC-Sugaya	San Francisco Planning Commission	public hearing comments	A-SFODC-Sugaya-01	ERP-1
A-SFPC-Sugaya	San Francisco Planning Commission	public hearing comments	A-SFPC-Sugaya-02	ESI-2
A-SFPC-Sugaya	San Francisco Planning Commission	public hearing comments	A-SFPC-Sugaya-03	ALT-5, PD-2
A-SFPC-Sugaya	San Francisco Planning Commission	public hearing comments	A-SFPC-Sugaya-04	PD-4
A-SFPC-Sugaya	San Francisco Planning Commission	public hearing comments	A-SFPC-Sugaya-05	ERP-1

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Agencies (cont.)</i>				
A-SFHPC	San Francisco Historic Preservation Commission	letter	A-SFHPC-01	PP-2, PP-3
A-SFHPC	San Francisco Historic Preservation Commission	letter	A-SFHPC-02	CR-2
A-SFHPC	San Francisco Historic Preservation Commission	letter	A-SFHPC-03	AE-1
A-SFHPC	San Francisco Historic Preservation Commission	letter	A-SFHPC-04	AE-2
A-SFHPC	San Francisco Historic Preservation Commission	letter	A-SFHPC-05	TR-1
A-SFHPC	San Francisco Historic Preservation Commission	letter	A-SFHPC-06	PD-2
A-SFHPC	San Francisco Historic Preservation Commission	letter	A-SFHPC-07	LU-1
A-SFHPC	San Francisco Historic Preservation Commission	letter	A-SFHPC-08	CR-6
A-SFHPC	San Francisco Historic Preservation Commission	letter	A-SFHPC-09	PD-1
A-SFHPC	San Francisco Historic Preservation Commission	letter	A-SFHPC-10	ALT-4
A-SFPUC	San Francisco Public Utilities Commission	letter	A-SFPUC-01	PD-4, HYD-3
A-SFPUC	San Francisco Public Utilities Commission	letter	A-SFPUC-02	PD-4, HYD-3
A-SFPUC	San Francisco Public Utilities Commission	letter	A-SFPUC-03	PD-4, HYD-3
A-SFPUC	San Francisco Public Utilities Commission	letter	A-SFPUC-04	HYD-1
<i>Organizations</i>				
O-CLF	The Cultural Landscape Foundation	letter	O-CLF-01	CR-2
O-CLF	The Cultural Landscape Foundation	letter	O-CLF-02	ALT-1
O-CLF	The Cultural Landscape Foundation	letter	O-CLF-03	CR-2
O-CLF	The Cultural Landscape Foundation	letter	O-CLF-04	CR-2
O-CLF	The Cultural Landscape Foundation	letter	O-CLF-05	CR-2
O-CLF	The Cultural Landscape Foundation	letter	O-CLF-06	CR-2
O-CLF	The Cultural Landscape Foundation	letter	O-CLF-07	CR-2

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENTS NUMBER, AND COMMENTS TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Organizations (cont.)</i>				
O-CLF	The Cultural Landscape Foundation	letter	O-CLF-08	CR-2, ALT-1
O-CPF	California Preservation Foundation	letter	O-CPF-01	PP-2
O-CPF	California Preservation Foundation	letter	O-CPF-02	PP-2
O-CPF	California Preservation Foundation	letter	O-CPF-03	ALT-1
O-CPF	California Preservation Foundation	letter	O-CPF-04	ALT-4
O-CSFN	Coalition for San Francisco Neighborhoods	letter	O-CSFN-01	CR-2
O-CSFN	Coalition for San Francisco Neighborhoods	letter	O-CSFN-02	BIO-2
O-CSFN	Coalition for San Francisco Neighborhoods	letter	O-CSFN-03	PD-4
O-CSFN	Coalition for San Francisco Neighborhoods	letter	O-CSFN-04	BIO-4
O-CSFN	Coalition for San Francisco Neighborhoods	letter	O-CSFN-05	ESI-2
O-CSFN	Coalition for San Francisco Neighborhoods	letter	O-CSFN-06	ALT-1
O-CSFN	Coalition for San Francisco Neighborhoods	letter	O-CSFN-07	PP-2
O-CSFN	Coalition for San Francisco Neighborhoods	letter	O-CSFN-08	HAZ-2, GC-2
O-CSFN	Coalition for San Francisco Neighborhoods	letter	O-CSFN-09	HAZ-1
O-CSFN	Coalition for San Francisco Neighborhoods	letter	O-CSFN-10	ALT-2
O-CSFN	Coalition for San Francisco Neighborhoods	letter	O-CSFN-11	ALT-4
O-CSFN2	Coalition for San Francisco Neighborhoods	letter	O-CSFN2-01	GC-1
O-CSFN3	Coalition for San Francisco Neighborhoods	public hearing comments	O-CSFN3-01	ERP-1, ESI-1
O-CYSA	California Youth Soccer Association	letter	O-CYSA-01	PD-2
O-CYSA	California Youth Soccer Association	letter	O-CYSA-02	HAZ-1
O-CYSA2	California Youth Soccer	letter	O-CYSA2-01	PP-2
O-CYSA2	California Youth Soccer	letter	O-CYSA2-02	HAZ-1
O-CYSA2	California Youth Soccer	letter	O-CYSA2-03	PP-3

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Organizations (cont.)</i>				
O-CYSA2	California Youth Soccer	letter	O-CYSA2-04	PD-2
O-CYSA3	California Youth Soccer Association	public hearing comments	O-CYSA3-01	HAZ-1
O-GGAS	Golden Gate Audobon Society	letter	O-GGAS-01	LU-1
O-GGAS	Golden Gate Audobon Society	letter	O-GGAS-02	ERP-1
O-GGAS	Golden Gate Audobon Society	letter	O-GGAS-03	LU-1
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-01	PP-2
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-02	ALT-1
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-03	BIO-3
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-04	BIO-3, BIO-1
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-05	ERP-1
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-06	ERP-1
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-07	HAZ-2
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-08	HAZ-2
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-09	ALT-3
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-10	ALT-4
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-11	ALT-1
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-12	ALT-1
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-13	ALT-1
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-14	ALT-1
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-15	PP-2, PP-3
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-16	PP-3
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-17	AE-2
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-18	PP-3
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-19	PP-3
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-20	PP-3
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-21	PP-3
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-22	PP-2
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-23	PP-2
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-24	PP-2
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-25	PP-2
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-26	BIO-3
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-27	BIO-1
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-28	BIO-1
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-29	BIO-3
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-30	BIO-4, BIO-1, BIO-3
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-31	BIO-3

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Organizations (cont.)</i>				
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-32	BIO-3
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-33	HYD-2
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-34	ALT-1, GC-2, PD-2, ALT-5
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-35	ALT-1
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-36	ALT-3
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-37	ALT-1
O-GGAS2	Golden Gate Audobon Society	letter	O-GGAS2-38	ALT-1
O-GGAS3	Golden Gate Audobon Society	public hearing comments	O-GGAS3-01	BIO-3
O-GGAS3	Golden Gate Audobon Society	public hearing comments	O-GGAS3-02	BIO-3
O-GGAS3	Golden Gate Audobon Society	public hearing comments	O-GGAS3-03	AE-2, ERP-3, BIO-1, HAZ-2
O-GGAS3	Golden Gate Audobon Society	public hearing comments	O-GGAS3-04	BIO-2, AE-2, ALT-5, BIO-4
O-GGPPA	Golden Gate Park Preservation Alliance	letter	O-GGPPA-01	PP-2
O-GGPPA	Golden Gate Park Preservation Alliance	letter	O-GGPPA-02	ERP-1
O-GGPPA	Golden Gate Park Preservation Alliance	letter	O-GGPPA-03	CR-2
O-GGPPA	Golden Gate Park Preservation Alliance	letter	O-GGPPA-04	CR-3
O-GGPPA	Golden Gate Park Preservation Alliance	letter	O-GGPPA-05	PD-2
O-GGPPA	Golden Gate Park Preservation Alliance	letter	O-GGPPA-06	PD-2, TR-1
O-GGPPA	Golden Gate Park Preservation Alliance	letter	O-GGPPA-07	ALT-1, PD-2, GC-2
O-GGPPA	Golden Gate Park Preservation Alliance	letter	O-GGPPA-08	PD-2, ALT-3
O-GGPPA	Golden Gate Park Preservation Alliance	letter	O-GGPPA-09	ALT-1, PP-2
O-GGPPA	Golden Gate Park Preservation Alliance	letter	O-GGPPA-10	ALT-1, PP-2
O-GGPPA	Golden Gate Park Preservation Alliance	letter	O-GGPPA-11	ALT-4
O-HANC	Haight Ashbury Neighborhood Council	letter	O-HANC-01	GC-1
O-PAR	Planning Association for the Richmond	letter	O-PAR-01	GC-1

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Organizations (cont.)</i>				
O-PAR2	Planning Association for the Richmond	email	O-PAR2-01	ESI-2, ERP-1
O-PAR2	Planning Association for the Richmond	email	O-PAR2-02	HYD-2
O-PAR2	Planning Association for the Richmond	email	O-PAR2-03	HYD-2
O-PAR2	Planning Association for the Richmond	email	O-PAR2-04	HAZ-1
O-PAR2	Planning Association for the Richmond	email	O-PAR2-05	HAZ-4
O-PAR2	Planning Association for the Richmond	email	O-PAR2-06	AE-1
O-PAR2	Planning Association for the Richmond	email	O-PAR2-07	PD-4
O-PAR2	Planning Association for the Richmond	email	O-PAR2-08	TR-3
O-PAR2	Planning Association for the Richmond	email	O-PAR2-09	BIO-3
O-PAR2	Planning Association for the Richmond	email	O-PAR2-10	BIO-4
O-PAR2	Planning Association for the Richmond	email	O-PAR2-11	ALT-5
O-PAR2	Planning Association for the Richmond	email	O-PAR2-12	CR-2
O-PAR3	Planning Association for the Richmond	letter	O-PAR3-01	HAZ-4
O-PAR3	Planning Association for the Richmond	letter	O-PAR3-02	AE-2
O-PAR3	Planning Association for the Richmond	letter	O-PAR3-03	PD-4
O-PAR3	Planning Association for the Richmond	letter	O-PAR3-04	ALT-2
O-PAR3	Planning Association for the Richmond	letter	O-PAR3-05	PD-4
O-PAR3	Planning Association for the Richmond	letter	O-PAR3-06	ESI-1, ERP-1
O-PAR3	Planning Association for the Richmond	letter	O-PAR3-07	AE-1
O-PAR3	Planning Association for the Richmond	letter	O-PAR3-08	PD-2
O-PAR3	Planning Association for the Richmond	letter	O-PAR3-09	ESI-1
O-PAR3	Planning Association for the Richmond	letter	O-PAR3-10	ALT-4

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Organizations (cont.)</i>				
O-PAR4	Planning Association for the Richmond	letter	O-PAR4-01	ERP-1, ESI-2
O-PAR4	Planning Association for the Richmond	letter	O-PAR4-02	HYD-2, HAZ-4
O-PAR5	Planning Association for the Richmond	public hearing comments	O-PAR5-01	ESI-2, ERP-1
O-PAR5	Planning Association for the Richmond	public hearing comments	O-PAR5-02	PD-4
O-RCA	Richmond Community Association	letter	O-RCA-01	PP-2
O-RCA	Richmond Community Association	letter	O-RCA-02	BIO-3
O-RCA	Richmond Community Association	letter	O-RCA-03	AE-2
O-RCA	Richmond Community Association	letter	O-RCA-04	PD-4
O-RCA	Richmond Community Association	letter	O-RCA-05	ESI-2, HYD-2
O-RCA	Richmond Community Association	letter	O-RCA-06	ALT-4
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-01	PD-1
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-02	LU-1
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-03	ESI-2
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-04	PP-2
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-05	ESI-2
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-06	ESI-2
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-07	BIO-1
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-08	AE-1
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-09	ERP-1
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-10	BIO-3
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-11	HYD-2

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Organizations (cont.)</i>				
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-12	HYD-2
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-13	HYD-2
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-14	HAZ-2, HAZ-4
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-15	HAZ-1
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-16	HYD-4
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-17	HYD-2
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-18	HYD-3
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-19	HYD-3
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-20	HYD-2
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-21	HYD-4
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-22	HYD-3
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-23	HYD-2
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-24	HYD-1
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-25	HAZ-4
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-26	HAZ-1, ERP-3
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-27	AE-2, BIO-4
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-28	AE-2
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-29	AE-2
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-30	BIO-4
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-31	AE-2, BIO-4
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-32	AE-2
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-33	BIO-1, BIO-4

TABLE COM-1 (Continued)
COMMENTER CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Organizations (cont.)</i>				
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-34	BIO-4
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-35	GC-1
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-36	ALT-2
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-37	ERP-1
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-38	ERP-1
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-39	PP-4
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-40	TR-4, TR-1
O-SCSFBC	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC-41	CR-2
O-SCSFBC2	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC2-01	BIO-3
O-SCSFBC2	Sierra Club San Francisco Bay Chapter	letter	O-SCSFBC2-02	PP-4, HAZ-4
O-SCSFBC3	Sierra Club San Francisco Bay Chapter	public hearing comments	O-SCSFBC3-01	HYD-2
O-SCSFBC3	Sierra Club San Francisco Bay Chapter	public hearing comments	O-SCSFBC3-02	BIO-3
O-SCSFBC3	Sierra Club San Francisco Bay Chapter	public hearing comments	O-SCSFBC3-03	HAZ-4
O-SFAH	San Francisco Architectural Heritage	letter	O-SFAH-01	PP-2, ALT-1
O-SFAH	San Francisco Architectural Heritage	letter	O-SFAH-02	ALT-4
O-SFAH	San Francisco Architectural Heritage	letter	O-SFAH-03	PP-2
O-SFAH	San Francisco Architectural Heritage	letter	O-SFAH-04	ALT-2
O-SFAH	San Francisco Architectural Heritage	letter	O-SFAH-05	PP-2
O-SFAH	San Francisco Architectural Heritage	letter	O-SFAH-06	ALT-1
O-SFAH	San Francisco Architectural Heritage	letter	O-SFAH-07	ALT-4
O-SFCC	San Francisco Chamber of Commerce	letter	O-SFCC-01	PD-2
O-SFCC	San Francisco Chamber of Commerce	letter	O-SFCC-02	ESI-1

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Organizations (cont.)</i>				
O-SFCC	San Francisco Chamber of Commerce	letter	O-SFCC-03	AE-2
O-SFLCR	San Francisco Lacrosse Club - Riptide	letter	O-SFLCR-01	PD-3
O-SFLCR	San Francisco Lacrosse Club - Riptide	letter	O-SFLCR-02	PD-2
O-SFLL	San Francisco Little League	letter	O-SFLL-01	PD-3
O-SFOE	San Francisco Ocean Edge	letter	O-SFOE-01	ALT-4
O-SFOE2	San Francisco Ocean Edge	letter	O-SFOE2-01	GC-1
O-SFOE/GGPPA	San Francisco Ocean Edge and Golden Gate Park Preservation Alliance	public hearing comments	O-SFOE/GGPPA-01	ALT-4
O-SFOE/GGPPA	San Francisco Ocean Edge and Golden Gate Park Preservation Alliance	public hearing comments	O-SFOE/GGPPA-02	ALT-4
O-SFOE/GGPPA	San Francisco Ocean Edge and Golden Gate Park Preservation Alliance	public hearing comments	O-SFOE/GGPPA-03	LU-1
O-SFPARKS	SFPARKS	letter	O-SFPARKS-01	ERP-1
O-SFPARKS	SFPARKS	letter	O-SFPARKS-02	HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-03	HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-04	HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-05	HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-06	HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-07	HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-08	HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-09	HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-10	HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-11	HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-12	HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-13	HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-14	HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-15	HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-16	HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-17	HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-18	HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-19	HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-20	HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-21	HAZ-1
O-SFPARKS	SFPARKS	letter	O-SFPARKS-22	HAZ-3

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENTS NUMBER, AND COMMENTS TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Organizations (cont.)</i>				
O-SFPARKS	SFPARKS	letter	O-SFPARKS-23	HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-24	HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-25	HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-26	HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-27	HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-28	HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-29	HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-30	HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-31	HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-32	HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-33	HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-34	ALT-3
O-SFPARKS	SFPARKS	letter	O-SFPARKS-35	ALT-1
O-SFPARKS	SFPARKS	letter	O-SFPARKS-36	ALT-1
O-SFPARKS	SFPARKS	letter	O-SFPARKS-37	RE-1
O-SFPARKS	SFPARKS	letter	O-SFPARKS-38	AE-2
O-SFPARKS	SFPARKS	letter	O-SFPARKS-39	PD-1
O-SFPARKS	SFPARKS	letter	O-SFPARKS-40	ERP-1, ERP-3
O-SFPARKS	SFPARKS	letter	O-SFPARKS-41	HAZ-5
O-SFPARKS	SFPARKS	letter	O-SFPARKS-42	HAZ-6
O-SFPARKS	SFPARKS	letter	O-SFPARKS-43	ERP-3
O-SFPARKS	SFPARKS	letter	O-SFPARKS-44	PD-1
O-SFPARKS	SFPARKS	letter	O-SFPARKS-45	CR-1
O-SFPARKS	SFPARKS	letter	O-SFPARKS-46	HAZ-2
O-SFPARKS	SFPARKS	letter	O-SFPARKS-47	GC-1
O-SFPARKS	SFPARKS	letter	O-SFPARKS-48	HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-49	ERP-3
O-SFPARKS	SFPARKS	letter	O-SFPARKS-50	HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-51	HAZ-2, HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-52	HAZ-2, HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-53	HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-54	HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-55	HAZ-4
O-SFPARKS	SFPARKS	letter	O-SFPARKS-56	ALT-1
O-SPEAK1	Sunset Parkside Education and Action Committee	letter	O-SPEAK-01	GC-1

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Organizations (cont.)</i>				
O-SPEAK2	Sunset Parkside Education and Action Committee	letter	O-SPEAK2-01	CR-4
O-SPEAK2	Sunset Parkside Education and Action Committee	letter	O-SPEAK2-02	ERP-1, ESI-2
O-SPEAK2	Sunset Parkside Education and Action Committee	letter	O-SPEAK2-03	CR-3
O-SPEAK2	Sunset Parkside Education and Action Committee	letter	O-SPEAK2-04	PP-2, PP-3
O-SPEAK2	Sunset Parkside Education and Action Committee	letter	O-SPEAK2-05	AE-1
O-SPEAK2	Sunset Parkside Education and Action Committee	letter	O-SPEAK2-06	ALT-4
O-SPEAK2	Sunset Parkside Education and Action Committee	letter	O-SPEAK2-07	PD-4
O-SPEAK2	Sunset Parkside Education and Action Committee	letter	O-SPEAK2-08	CR-4
O-SPEAK2	Sunset Parkside Education and Action Committee	letter	O-SPEAK2-09	CR-4, AE-1
O-SPEAK3	Sunset Parkside Education and Action Committee	letter	O-SPEAK3-01	ESI-2, ERP-1
O-SPEAK3	Sunset Parkside Education and Action Committee	letter	O-SPEAK3-02	ERP-1
O-SPEAK3	Sunset Parkside Education and Action Committee	letter	O-SPEAK3-03	CR-3
O-SPEAK3	Sunset Parkside Education and Action Committee	letter	O-SPEAK3-04	CR-4
O-SPEAK3	Sunset Parkside Education and Action Committee	letter	O-SPEAK3-05	PD-1, CR-2
O-SPEAK3	Sunset Parkside Education and Action Committee	letter	O-SPEAK3-06	PD-4
O-SPEAK3	Sunset Parkside Education and Action Committee	letter	O-SPEAK3-07	LU-1, PP-1
O-SPEAK3	Sunset Parkside Education and Action Committee	letter	O-SPEAK3-08	AE-1
O-SPEAK3	Sunset Parkside Education and Action Committee	letter	O-SPEAK3-09	PP-2
O-SPEAK3	Sunset Parkside Education and Action Committee	letter	O-SPEAK3-10	TR-4
O-SPEAK3	Sunset Parkside Education and Action Committee	letter	O-SPEAK3-11	PD-2
O-SPEAK3	Sunset Parkside Education and Action Committee	letter	O-SPEAK3-12	PD-2
O-SPEAK3	Sunset Parkside Education and Action Committee	letter	O-SPEAK3-13	ALT-4

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Organizations (cont.)</i>				
O-SPEAK3	Sunset Parkside Education and Action Committee	letter	O-SPEAK3-14	PD-4, GC-2
O-SPEAK4	Sunset Parkside Education and Action Committee	letter	O-SPEAK4-01	CR-4
O-SPEAK4	Sunset Parkside Education and Action Committee	letter	O-SPEAK4-02	ERP-1
O-SPEAK4	Sunset Parkside Education and Action Committee	letter	O-SPEAK4-03	CR-4
O-SPEAK4	Sunset Parkside Education and Action Committee	letter	O-SPEAK4-04	AE-3, PP-2, PP-3
O-SPEAK4	Sunset Parkside Education and Action Committee	letter	O-SPEAK4-05	AE-1
O-SPEAK4	Sunset Parkside Education and Action Committee	letter	O-SPEAK4-06	ALT-4
O-SPEAK4	Sunset Parkside Education and Action Committee	letter	O-SPEAK4-07	PD-4
O-SPEAK4	Sunset Parkside Education and Action Committee	letter	O-SPEAK4-08	CR-4
O-SPEAK4	Sunset Parkside Education and Action Committee	letter	O-SPEAK4-09	AE-1
O-SPEAK4	Sunset Parkside Education and Action Committee	letter	O-SPEAK4-10	PD-2
O-SPEAK4	Sunset Parkside Education and Action Committee	letter	O-SPEAK4-11	ALT-4
O-THD	Telegraph Hill Dwellers	letter	O-THD-01	GC-1
<i>Individuals</i>				
I-Anderson	Raja Anderson	email	I-Anderson-01	ALT-4
I-Anderson	Raja Anderson	email	I-Anderson-02	AE-1
I-Anderson	Raja Anderson	email	I-Anderson-03	BIO-2
I-Anderson	Raja Anderson	email	I-Anderson-04	PD-4
I-Anderson	Raja Anderson	email	I-Anderson-05	AE-2
I-Anderson	Raja Anderson	email	I-Anderson-06	BIO-2
I-Anderson	Raja Anderson	email	I-Anderson-07	ESI-2, RE-1
I-Anderson	Raja Anderson	email	I-Anderson-08	BIO-3
I-Anderson	Raja Anderson	email	I-Anderson-09	PP-2
I-Anderson	Raja Anderson	email	I-Anderson-10	BIO-2
I-Anderson	Raja Anderson	email	I-Anderson-11	TR-1
I-Anderson	Raja Anderson	email	I-Anderson-12	TR-4
I-Anderson	Raja Anderson	email	I-Anderson-13	TR-2
I-Anderson	Raja Anderson	email	I-Anderson-14	TR-3
I-Anderson	Raja Anderson	email	I-Anderson-15	TR-1

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-Anderson	Raja Anderson	email	I-Anderson-16	PD-4
I-Anderson	Raja Anderson	email	I-Anderson-17	ALT-3
I-Anderson	Raja Anderson	email	I-Anderson-18	PD-4, GC-2
I-Anderson	Raja Anderson	email	I-Anderson-19	PD-4
I-Anderson	Raja Anderson	email	I-Anderson-20	AE-2
I-Arack	Patricia Arack - City Currents Editor	email	I-Arack-01	AE-2
I-Arack	Patricia Arack - City Currents Editor	email	I-Arack-02	LU-1
I-Arack	Patricia Arack - City Currents Editor	email	I-Arack-03	PP-2
I-Arack	Patricia Arack - City Currents Editor	email	I-Arack-04	HYD-2
I-Arack	Patricia Arack - City Currents Editor	email	I-Arack-05	BIO-4
I-Arack	Patricia Arack - City Currents Editor	email	I-Arack-06	AE-2
I-Arack	Patricia Arack - City Currents Editor	email	I-Arack-07	PD-2
I-Arack	Patricia Arack - City Currents Editor	email	I-Arack-08	TR-2
I-Arack	Patricia Arack - City Currents Editor	email	I-Arack-09	ALT-4
I-Arack2	Patricia Arack	public hearing comments	I-Arack2-01	LU-1
I-Arack2	Patricia Arack	public hearing comments	I-Arack2-02	AE-2
I-Arack2	Patricia Arack	public hearing comments	I-Arack2-03	BIO-4
I-Arack2	Patricia Arack	public hearing comments	I-Arack2-04	AE-2
I-Arack2	Patricia Arack	public hearing comments	I-Arack2-05	HYD-3
I-Bard	Kevin Bard	public hearing comments	I-Bard-01	ERP-1
I-Bar-David	Llana Bar-David	email	I-Bar-David-01	ALT-4
I-Bar-David	Llana Bar-David	email	I-Bar-David-02	PD-4
I-Bar-David	Llana Bar-David	email	I-Bar-David-03	ALT-3
I-Bar-David	Llana Bar-David	email	I-Bar-David-04	TR-3, GC-2, PD-4
I-Bar-David	Llana Bar-David	email	I-Bar-David-05	PD-4
I-Barish	Jean Barish	letter	I-Barish-01	PD-4

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-Barish	Jean Barish	letter	I-Barish-02	PD-4
I-Barish	Jean Barish	letter	I-Barish-03	PP-2
I-Barish	Jean Barish	letter	I-Barish-04	LU-1
I-Barish	Jean Barish	letter	I-Barish-05	ERP-1
I-Barish	Jean Barish	letter	I-Barish-06	AE-2
I-Barish	Jean Barish	letter	I-Barish-07	AE-1
I-Barish	Jean Barish	letter	I-Barish-08	TR-1
I-Barish	Jean Barish	letter	I-Barish-09	HAZ-4
I-Barish	Jean Barish	letter	I-Barish-10	HYD-2
I-Barish	Jean Barish	letter	I-Barish-11	HYD-4, HAZ-4
I-Barish	Jean Barish	letter	I-Barish-12	HYD-4
I-Barish	Jean Barish	letter	I-Barish-13	HYD-3, HAZ-4
I-Barish	Jean Barish	letter	I-Barish-14	HYD-4
I-Barish	Jean Barish	letter	I-Barish-15	HYD-1
I-Barish	Jean Barish	letter	I-Barish-16	HYD-1, HYD-3
I-Barish	Jean Barish	letter	I-Barish-17	HAZ-1, HAZ-4
I-Barish	Jean Barish	letter	I-Barish-18	ERP-1, ERP-3
I-Barish	Jean Barish	letter	I-Barish-19	HAZ-5
I-Barish	Jean Barish	letter	I-Barish-20	ERP-1
I-Barish	Jean Barish	letter	I-Barish-21	HAZ-6
I-Barish	Jean Barish	letter	I-Barish-22	PD-4
I-Barish	Jean Barish	letter	I-Barish-23	HAZ-4
I-Barish	Jean Barish	letter	I-Barish-24	PD-4
I-Barish	Jean Barish	letter	I-Barish-25	HAZ-3
I-Barish	Jean Barish	letter	I-Barish-26	PD-4
I-Barish	Jean Barish	letter	I-Barish-27	HAZ-4
I-Barish	Jean Barish	letter	I-Barish-28	HAZ-4
I-Barish	Jean Barish	letter	I-Barish-29	HAZ-4, HAZ-5
I-Barish	Jean Barish	letter	I-Barish-30	HAZ-5
I-Barish	Jean Barish	letter	I-Barish-31	HAZ-5, PD-4
I-Barish	Jean Barish	letter	I-Barish-32	HAZ-4, HAZ-6
I-Barish	Jean Barish	letter	I-Barish-33	HAZ-1
I-Barish	Jean Barish	letter	I-Barish-34	ERP-3

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-Barish	Jean Barish	letter	I-Barish-35	PD-4
I-Barish	Jean Barish	letter	I-Barish-36	HAZ-2
I-Bartley	Eddie Bartley	email	I-Bartley-01	BIO-3
I-Bartley	Eddie Bartley	email	I-Bartley-02	BIO-1
I-Bartley	Eddie Bartley	email	I-Bartley-03	BIO-3
I-Bartley	Eddie Bartley	email	I-Bartley-04	BIO-4, BIO-3
I-Bartley	Eddie Bartley	email	I-Bartley-05	BIO-4
I-Bartley	Eddie Bartley	email	I-Bartley-06	BIO-1
I-Bartley	Eddie Bartley	email	I-Bartley-07	ERP-1
I-Bartley	Eddie Bartley	email	I-Bartley-08	HYD-2
I-Bartley	Eddie Bartley	email	I-Bartley-09	HAZ-4
I-Bartley	Eddie Bartley	email	I-Bartley-10	HAZ-2
I-Bartley	Eddie Bartley	email	I-Bartley-11	GC-2
I-Bartley	Eddie Bartley	email	I-Bartley-12	PP-2
I-Bartley	Eddie Bartley	email	I-Bartley-13	BIO-1
I-Baum	Terry Joan Baum	email	I-Baum-01	AE-1, AE-2
I-Baum2	Terry Baum	public hearing comments	I-Baum2-01	AE-2
I-Begley	Steve Begley	public hearing comments	I-Begley-01	LU-1
I-Belkora	Jeff Belkora, Ph.D.	email	I-Belkora-01	PD-2
I-Boskin	Steve Boskin	email	I-Boskin-01	PD-2
I-Bowman	Arnita Bowman	email	I-Bowman-01	AE-2, LU-1
I-Bowman	Arnita Bowman	email	I-Bowman-02	ALT-4
I-Brant	Michael Brant	email	I-Brant-01	CR-2, PP-2
I-Brant	Michael Brant	email	I-Brant-02	BIO-3, TR-3, AE-2, HAZ-4, BIO-4
I-Bridges	Stacey Bridges	email	I-Bridges-01	PP-2
I-Bridges	Stacey Bridges	email	I-Bridges-02	BIO-2, BIO-3
I-Bridges	Stacey Bridges	email	I-Bridges-03	BIO-4
I-Bridges	Stacey Bridges	email	I-Bridges-04	HAZ-2
I-Bridges	Stacey Bridges	email	I-Bridges-05	ALT-2, GC-2
I-Bridges	Stacey Bridges	email	I-Bridges-06	GC-2
I-Bridges	Stacey Bridges	email	I-Bridges-07	AE-2, BIO-3, PP-2, BIO-4
I-Browd	Gary Browd	email	I-Browd-01	PP-2
I-Browd	Gary Browd	email	I-Browd-02	AE-3

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-Browd	Gary Browd	email	I-Browd-03	BIO-3, TR-2, TR-3, AE-2, GC-2, BIO-4, HAZ-4
I-Browd	Gary Browd	email	I-Browd-04	ALT-1
I-Brown	Jessica Brown	email	I-Brown-01	BIO-3, LU-1
I-Brown	Jessica Brown	email	I-Brown-02	ERP-3
I-Brown	Jessica Brown	email	I-Brown-03	AE-2
I-Brown	Jessica Brown	email	I-Brown-04	GC-2, BIO-3, LU-1
I-Brown	Jessica Brown	email	I-Brown-05	AE-2, LU-1
I-Buckbee	Charles Buckbee	letter	I-Buckbee-01	PD-2
I-Bufferum	Nancy Bufferum	email	I-Bufferum-01	LU-1
I-Bufferum	Nancy Bufferum	email	I-Bufferum-02	GC-2
I-Bufferum	Nancy Bufferum	email	I-Bufferum-03	ALT-4
I-Bufferum	Nancy Bufferum	email	I-Bufferum-04	BIO-4, AE-2, AE-4
I-Bufferum	Nancy Bufferum	email	I-Bufferum-05	ESI-2, PP-2, PD-4
I-Bufferum	Nancy Bufferum	email	I-Bufferum-06	GC-2
I-Bufferum	Nancy Bufferum	email	I-Bufferum-07	HAZ-4
I-Buhler	Mike Buhler	public hearing comments	I-Buhler-01	CR-2
I-Buhler	Mike Buhler	public hearing comments	I-Buhler-02	PP-2
I-Buhler	Mike Buhler	public hearing comments	I-Buhler-03	ALT-1
I-Buhler	Mike Buhler	public hearing comments	I-Buhler-04	ALT-4
I-Butler	Joseph Butler	public hearing comments	I-Butler-01	CR-4
I-Butler	Joseph Butler	public hearing comments	I-Butler-02	HAZ-4
I-Butler	Joseph Butler	public hearing comments	I-Butler-03	CR-4
I-Campos	Roland Campos	email	I-Campos-01	ERP-1
I-Campos	Roland Campos	email	I-Campos-02	ALT-2
I-Campos	Roland Campos	email	I-Campos-03	ALT-2, ERP-1, PP-2
I-Campos2	Roland Campos	public hearing comments	I-Campos2-01	PP-2
I-Chappell	Jim Chappell	letter	I-Chappell-01	ERP-1

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-Chappell	Jim Chappell	letter	I-Chappell-02	PD-1
I-Chappell	Jim Chappell	letter	I-Chappell-03	PP-3
I-Chappell	Jim Chappell	letter	I-Chappell-04	PP-4
I-Chappell	Jim Chappell	letter	I-Chappell-05	BIO-2, ESI-2
I-Chappell	Jim Chappell	letter	I-Chappell-06	PP-3
I-Chappell	Jim Chappell	letter	I-Chappell-07	PP-2
I-Chappell	Jim Chappell	letter	I-Chappell-08	PP-4, ESI-2
I-Chappell	Jim Chappell	letter	I-Chappell-09	PP-4
I-Chappell2	Jim Chappell	public hearing comments	I-Chappell2-01	PP-2
I-Chappell2	Jim Chappell	public hearing comments	I-Chappell2-02	PP-2
I-Chappell2	Jim Chappell	public hearing comments	I-Chappell2-03	LU-1
I-Chappell2	Jim Chappell	public hearing comments	I-Chappell2-04	PP-2
I-Chappell3	Jim Chappell	letter	I-Chappell3-01	PP-2
I-Cherny	Robert Cherny	email	I-Cherny-01	PP-2, LU-1
I-Cherny	Robert Cherny	email	I-Cherny-02	PD-3
I-Cherny	Robert Cherny	email	I-Cherny-03	ALT-3
I-Ciccone	Don Ciccone	email	I-Ciccone-01	BIO-3
I-Ciccone	Don Ciccone	email	I-Ciccone-02	RE-1, ERP-2
I-Citron	Ben Citron	email	I-Citron-01	ALT-4
I-Citron	Ben Citron	email	I-Citron-02	TR-3, LU-1, BIO-3, TR-1, PP-2, ERP-3
I-Citron	Ben Citron	email	I-Citron-03	RE-1
I-Citron	Ben Citron	email	I-Citron-04	AE-1
I-Citron	Ben Citron	email	I-Citron-05	BIO-2
I-Citron	Ben Citron	email	I-Citron-06	PD-4
I-Citron	Ben Citron	email	I-Citron-07	AE-2, BIO-4
I-Citron	Ben Citron	email	I-Citron-08	BIO-2
I-Citron	Ben Citron	email	I-Citron-09	ESI-2, RE-1
I-Citron	Ben Citron	email	I-Citron-10	PP-2
I-Citron	Ben Citron	email	I-Citron-11	BIO-2
I-Citron	Ben Citron	email	I-Citron-12	TR-1, TR-4
I-Citron	Ben Citron	email	I-Citron-13	TR-2
I-Citron	Ben Citron	email	I-Citron-14	TR-3
I-Citron	Ben Citron	email	I-Citron-15	TR-1

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-Citron	Ben Citron	email	I-Citron-16	PD-4
I-Citron	Ben Citron	email	I-Citron-17	ALT-3
I-Citron	Ben Citron	email	I-Citron-18	PD-4, GC-2
I-AClark	Ann Clark, Ph.D.	letter	I-AClark-01	PD-4
I-AClark	Ann Clark, Ph.D.	letter	I-AClark-02	ESI-1
I-AClark	Ann Clark, Ph.D.	letter	I-AClark-03	PD-4
I-AClark	Ann Clark, Ph.D.	letter	I-AClark-04	LU-1
I-AClark	Ann Clark, Ph.D.	letter	I-AClark-05	PD-2
I-AClark	Ann Clark, Ph.D.	letter	I-AClark-06	PD-4
I-AClark	Ann Clark, Ph.D.	letter	I-AClark-07	ERP-1
I-AClark	Ann Clark, Ph.D.	letter	I-AClark-08	PD-4
I-AClark	Ann Clark, Ph.D.	letter	I-AClark-09	LU-1
I-AClark	Ann Clark, Ph.D.	letter	I-AClark-10	TR-3
I-AClark	Ann Clark, Ph.D.	letter	I-AClark-11	PD-4
I-AClark	Ann Clark, Ph.D.	letter	I-AClark-12	PD-4
I-AClark	Ann Clark, Ph.D.	letter	I-AClark-13	PD-4, TR-3, LU-1
I-AClark	Ann Clark, Ph.D.	letter	I-AClark-14	PD-4
I-AClark	Ann Clark, Ph.D.	letter	I-AClark-15	PD-4
I-AClark	Ann Clark, Ph.D.	letter	I-AClark-16	ALT-4
I-AClark2	Ann Clark	public hearing comments	I-AClark2-01	PD-4
I-AClark2	Ann Clark	public hearing comments	I-AClark2-02	TR-3
I-JClark	Janet Clark	public hearing comments	I-JClark-01	AE-2
I-JClark	Janet Clark	public hearing comments	I-JClark-02	AE-2
I-JClark	Janet Clark	public hearing comments	I-JClark-03	ALT-5
I-Clayton	Rupert Clayton	letter	I-Clayton-01	ALT-1
I-Clayton	Rupert Clayton	letter	I-Clayton-02	ALT-4
I-Clayton	Rupert Clayton	letter	I-Clayton-03	ALT-4
I-Clayton	Rupert Clayton	letter	I-Clayton-04	ALT-4
I-Clayton	Rupert Clayton	letter	I-Clayton-05	ALT-1
I-Clayton	Rupert Clayton	letter	I-Clayton-06	GC-2, ALT-4
I-Clayton	Rupert Clayton	letter	I-Clayton-07	ALT-4
I-Clayton	Rupert Clayton	letter	I-Clayton-08	ALT-4
I-Clayton	Rupert Clayton	letter	I-Clayton-09	PD-2, PP-2

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-Clayton	Rupert Clayton	letter	I-Clayton-10	PP-2
I-Clayton2	Rupert Clayton	public hearing comments	I-Clayton2-01	ALT-4
I-Colao	Flora Colao	email	I-Colao-01	HAZ-4
I-Colao	Flora Colao	email	I-Colao-02	BIO-2
I-Colao	Flora Colao	email	I-Colao-03	ERP-3
I-Colao	Flora Colao	email	I-Colao-04	RE-1
I-Colao	Flora Colao	email	I-Colao-05	ERP-2
I-Colao	Flora Colao	email	I-Colao-06	BIO-3
I-Colao	Flora Colao	email	I-Colao-07	HYD-2
I-Colao	Flora Colao	email	I-Colao-08	HAZ-2
I-Colao	Flora Colao	email	I-Colao-09	ALT-2
I-Colen	Tim Colen	letter	I-Colen-01	PD-3
I-Colen	Tim Colen	letter	I-Colen-02	PD-2
I-Colvin	Lucy Colvin	email	I-Colvin-01	BIO-1, RE-1
I-Cope	Jeffrey Cope	public hearing comments	I-Cope-01	LU-1
I-Cope	Jeffrey Cope	public hearing comments	I-Cope-02	ALT-1
I-Cope	Jeffrey Cope	public hearing comments	I-Cope-03	HYD-2
I-Cope	Jeffrey Cope	public hearing comments	I-Cope-04	AE-2
I-Corley	Jackie Corley	public hearing comments	I-Corley-01	AE-2
I-Corley	Jackie Corley	public hearing comments	I-Corley-02	ALT-2
I-Cross	Richard Cross	email	I-Cross-01	PD-2, GC-2
I-Crowley	William Crowley	letter	I-Crowley-01	HAZ-4
I-Crowley	William Crowley	letter	I-Crowley-02	HYD-3, HAZ-5
I-Crowley	William Crowley	letter	I-Crowley-03	HAZ-5
I-Crowley	William Crowley	letter	I-Crowley-04	HAZ-4, HAZ-5
I-Crowley	William Crowley	letter	I-Crowley-05	PP-2
I-Crowley2	Bill Crowley	public hearing comments	I-Crowley2-01	ALT-1
I-Crowley2	Bill Crowley	public hearing comments	I-Crowley2-02	HAZ-4
I-Cuddeback	Sam Cuddeback	public hearing comments	I-Cuddeback-01	ERP-1

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-Daley	Thomas Daley	email	I-Daley-01	LU-1
I-Daley	Thomas Daley	email	I-Daley-02	TR-2
I-Daley	Thomas Daley	email	I-Daley-03	HYD-2
I-Daley2	Thomas Daley	email	I-Daley2-01	LU-1
I-D'Angelo	Jack E D'Angelo	email	I-D'Angelo-01	PD-3
I-D'Angelo	Jack E D'Angelo	email	I-D'Angelo-02	BIO-4
I-D'Anne	Denise D'Anne	letter	I-D-Anne-01	LU-1
I-D'Anne	Denise D'Anne	letter	I-D-Anne-02	ALT-5
I-D'Anne2	Denise D'Anne	letter	I-D'Anne2-01	BIO-3, ERP-3, PP-2
I-D'Anne3	Denise D'Anne	public hearing comments	I-D'Anne3-01	LU-1
I-Darrigrand	Jacqueline Darrigrand	email	I-Darrigrand-01	GC-1
I-Darrigrand & Clafin	Jacqueline Darrigrand and William Clafin	letter	I-Darrigrand & Clafin-01	ALT-4
I-Darrigrand & Clafin	Jacqueline Darrigrand and William Clafin	letter	I-Darrigrand & Clafin-02	AE-2
I-Darrigrand & Clafin	Jacqueline Darrigrand and William Clafin	letter	I-Darrigrand & Clafin-03	BIO-2
I-Darrigrand & Clafin	Jacqueline Darrigrand and William Clafin	letter	I-Darrigrand & Clafin-04	PD-4
I-Darrigrand & Clafin	Jacqueline Darrigrand and William Clafin	letter	I-Darrigrand & Clafin-05	ESI-2
I-Darrigrand & Clafin	Jacqueline Darrigrand and William Clafin	letter	I-Darrigrand & Clafin-06	TR-2
I-Darrigrand & Clafin	Jacqueline Darrigrand and William Clafin	letter	I-Darrigrand & Clafin-07	GC-2
I-EDavis	Evette Davis	email	I-EDavis-01	PD-2
I-FDavis	Fred Davis	letter	I-FDavis-01	AE-1
I-FDavis	Fred Davis	letter	I-FDavis-02	AE-1, BIO-3
I-FDavis	Fred Davis	letter	I-FDavis-03	ERP-3
I-FDavis	Fred Davis	letter	I-FDavis-04	HAZ-4, HYD-3
I-FDavis	Fred Davis	letter	I-FDavis-05	ALT-2
I-FDavis	Fred Davis	letter	I-FDavis-06	ALT-5
I-de Forest	John de Forest	email	I-de Forest-01	ALT-4
I-de Forest	John de Forest	email	I-de Forest-02	AE-2
I-de Forest	John de Forest	email	I-de Forest-03	AE-1
I-de Forest	John de Forest	email	I-de Forest-04	BIO-4
I-Dean	Christopher Dean	email	I-Dean-01	PD-2

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-DeLisle	Jimmy DeLisle	public hearing comments	I-DeLisle-01	BIO-4
I-DeLisle	Jimmy DeLisle	public hearing comments	I-DeLisle-02	ALT-2
I-Denefeld	Charles Denefeld	email	I-Denefeld-01	ALT-4
I-Denefeld	Charles Denefeld	email	I-Denefeld-02	AE-2
I-Denefeld2	Charles Denefeld	letter	I-Denefeld2-01	BIO-3
I-Denefeld2	Charles Denefeld	letter	I-Denefeld2-02	BIO-4
I-Denefeld2	Charles Denefeld	letter	I-Denefeld2-03	RE-1
I-Denefeld2	Charles Denefeld	letter	I-Denefeld2-04	AE-2
I-Denefeld2	Charles Denefeld	letter	I-Denefeld2-05	LU-1
I-Denefeld2	Charles Denefeld	letter	I-Denefeld2-06	ALT-2
I-Dennenberg	Hava Dennenberg	email	I-Dennenberg-01	ALT-4
I-Dennenberg	Hava Dennenberg	email	I-Dennenberg-02	AE-1
I-Dennenberg	Hava Dennenberg	email	I-Dennenberg-03	BIO-2
I-Dennenberg	Hava Dennenberg	email	I-Dennenberg-04	PD-4
I-Dennenberg	Hava Dennenberg	email	I-Dennenberg-05	AE-2, BIO-4, BIO-4
I-Dennenberg	Hava Dennenberg	email	I-Dennenberg-06	BIO-2
I-Dennenberg	Hava Dennenberg	email	I-Dennenberg-07	ESI-2, RE-1
I-Dennenberg	Hava Dennenberg	email	I-Dennenberg-08	PP-2
I-Dennenberg	Hava Dennenberg	email	I-Dennenberg-09	BIO-2
I-Dennenberg	Hava Dennenberg	email	I-Dennenberg-10	TR-1
I-Dennenberg	Hava Dennenberg	email	I-Dennenberg-11	TR-4
I-Dennenberg	Hava Dennenberg	email	I-Dennenberg-12	TR-2
I-Dennenberg	Hava Dennenberg	email	I-Dennenberg-13	TR-3
I-Dennenberg	Hava Dennenberg	email	I-Dennenberg-14	TR-1
I-Dennenberg	Hava Dennenberg	email	I-Dennenberg-15	PD-4
I-Dennenberg	Hava Dennenberg	email	I-Dennenberg-16	ALT-3
I-Dennenberg	Hava Dennenberg	email	I-Dennenberg-17	PD-4, GC-2
I-Donjacour	Annemarie Donjacour	letter	I-Donjacour-01	AE-2
I-Donjacour	Annemarie Donjacour	letter	I-Donjacour-02	BIO-3, BIO-4
I-Donjacour	Annemarie Donjacour	letter	I-Donjacour-03	BIO-3
I-Donjacour	Annemarie Donjacour	letter	I-Donjacour-04	HYD-3
I-Donjacour	Annemarie Donjacour	letter	I-Donjacour-05	ALT-1
I-Dowell	Jessica Dowell	public hearing comments	I-Dowell-01	AE-2
I-Dowell	Jessica Dowell	public hearing comments	I-Dowell-02	BIO-1, HAZ-4

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-Dowell	Jessica Dowell	public hearing comments	I-Dowell-03	ALT-4
I-Draper	Andrea Draper	email	I-Draper-01	GC-2
I-Draper	Andrea Draper	email	I-Draper-02	BIO-3, BIO-4
I-Draper	Andrea Draper	email	I-Draper-03	ALT-4
I-Duderstadt	Christopher Duderstadt	letter	I-Duderstadt-01	HAZ-1
I-Duderstadt	Christopher Duderstadt	letter	I-Duderstadt-02	CR-1
I-Duderstadt	Christopher Duderstadt	letter	I-Duderstadt-03	CR-1
I-Duderstadt2	Chris Duderstadt	public hearing comments	I-Duderstadt2-01	HAZ-1
I-Dumont	Suzanne Dumont	public hearing comments	I-Dumont-01	HAZ-7
I-Dumont	Suzanne Dumont	public hearing comments	I-Dumont-02	ALT-2
I-Dworsky	Claire Dworsky	public hearing comments	I-Dworsky-01	HYD-3, HYD-4
I-Edelson	Ellen Edelson	email	I-Edelson-01	ALT-4
I-Edelson	Ellen Edelson	email	I-Edelson-02	CR-2
I-Edelson	Ellen Edelson	email	I-Edelson-03	BIO-2
I-Edelson	Ellen Edelson	email	I-Edelson-04	AE-1
I-Edelson	Ellen Edelson	email	I-Edelson-05	BIO-2
I-Edelson	Ellen Edelson	email	I-Edelson-06	PD-4
I-Edelson	Ellen Edelson	email	I-Edelson-07	AE-2
I-Edelson	Ellen Edelson	email	I-Edelson-08	BIO-2
I-Edelson	Ellen Edelson	email	I-Edelson-09	RE-1, ESI-2
I-Edelson	Ellen Edelson	email	I-Edelson-10	PP-2
I-Edelson	Ellen Edelson	email	I-Edelson-11	BIO-2
I-Edelson	Ellen Edelson	email	I-Edelson-12	TR-1
I-Edelson	Ellen Edelson	email	I-Edelson-13	TR-4
I-Edelson	Ellen Edelson	email	I-Edelson-14	TR-2
I-Edelson	Ellen Edelson	email	I-Edelson-15	TR-3
I-Edelson	Ellen Edelson	email	I-Edelson-16	TR-1
I-Edelson	Ellen Edelson	email	I-Edelson-17	PD-4
I-Edelson	Ellen Edelson	email	I-Edelson-18	ALT-3
I-Edelson	Ellen Edelson	email	I-Edelson-19	PD-4, GC-2
I-Edelson2	Ellen Edelson	public hearing comments	I-Edelson2-01	ESI-1
I-Edelson2	Ellen Edelson	public hearing comments	I-Edelson2-02	HAZ-4, HAZ-5

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-Edelson2	Ellen Edelson	public hearing comments	I-Edelson2-03	ERP-1
I-Edelson2	Ellen Edelson	public hearing comments	I-Edelson2-04	AE-2
I-Edelson2	Ellen Edelson	public hearing comments	I-Edelson2-05	BIO-1
I-Edelson2	Ellen Edelson	public hearing comments	I-Edelson2-06	LU-1
I-Elias	Evan Elias	letter	I-Elias-01	BIO-1, BIO-4
I-Elias	Evan Elias	letter	I-Elias-02	BIO-4, BIO-3
I-Elias	Evan Elias	letter	I-Elias-03	BIO-3
I-Elias	Evan Elias	letter	I-Elias-04	PP-4, ESI-2
I-Elias	Evan Elias	letter	I-Elias-05	BIO-4
I-Elias	Evan Elias	letter	I-Elias-06	HYD-1, HYD-4
I-Elias	Evan Elias	letter	I-Elias-07	BIO-3
I-Elias	Evan Elias	letter	I-Elias-08	ALT-3
I-Elias	Evan Elias	letter	I-Elias-09	ALT-2
I-Elsner	Nancy Elsner	letter	I-Elsner-01	LU-1
I-Englander	Susan Englander	email	I-Englander-01	HYD-3, HAZ-4
I-Englander	Susan Englander	email	I-Englander-02	HAZ-4
I-Englander2	Susan Englander	public hearing comments	I-Englander2-01	LU-1
I-Englander2	Susan Englander	public hearing comments	I-Englander2-02	HAZ-4
I-Englander2	Susan Englander	public hearing comments	I-Englander2-03	PD-4, GC-2
I-Englander2	Susan Englander	public hearing comments	I-Englander2-04	AE-2
I-Englander2	Susan Englander	public hearing comments	I-Englander2-05	LU-1
I-Faulkner	Terence Faulkner	public hearing comments	I-Faulkner-01	LU-1
I-Faulkner	Terence Faulkner	public hearing comments	I-Faulkner-02	BIO-1
I-Foree-Henson	Elizabeth Foree & Ralph Henson	email	I-Foree-Henson-01	AE-2
I-Foree-Henson	Elizabeth Foree & Ralph Henson	email	I-Foree-Henson-02	BIO-3
I-Foree-Henson	Elizabeth Foree & Ralph Henson	email	I-Foree-Henson-03	PD-4, GC-2

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-Foree-Henson	Elizabeth Foree & Ralph Henson	email	I-Foree-Henson-04	ALT-4
I-Fraysse	Pierre Fraysse	email	I-Fraysse-01	GC-2
I-Fukuda	Hiroshi Fukuda	public hearing comments	I-Fukuda-01	PP-2
I-Fukuda	Hiroshi Fukuda	public hearing comments	I-Fukuda-02	HAZ-2, GC-2
I-Fukuda	Hiroshi Fukuda	public hearing comments	I-Fukuda-03	ALT-2
I-Fukuda	Hiroshi Fukuda	public hearing comments	I-Fukuda-04	ALT-3, ALT-5
I-Garside	Michele Garside	email	I-Garside-01	LU-1
I-Gattuso	Courtney Gattuso	public hearing comments	I-Gattuso-01	HYD-2
I-Gattuso	Courtney Gattuso	public hearing comments	I-Gattuso-02	BIO-3, HYD-2
I-Gattuso	Courtney Gattuso	public hearing comments	I-Gattuso-03	ALT-2
I-GGerrity	Graham Gerrity	public hearing comments	I-GGerrity-01	PD-3, PD-4
I-MGerrity	Michael Gerrity	public hearing comments	I-MGerrity-01	PP-2
I-MGerrity	Michael Gerrity	public hearing comments	I-MGerrity-02	PD-3
I-MGerrity2	Michael Gerrity	letter	I-MGerrity2-01	PP-2
I-MGerrity2	Michael Gerrity	letter	I-MGerrity2-02	PD-3
I-MGerrity2	Michael Gerrity	letter	I-MGerrity2-03	PD-2
I-Glichstern	Anastasia Glichstern	public hearing comments	I-Glichstern-01	HAZ-4
I-Glichstern	Anastasia Glichstern	public hearing comments	I-Glichstern-02	HAZ-1
I-Glichstern	Anastasia Glichstern	public hearing comments	I-Glichstern-03	HYD-2
I-Glichstern	Anastasia Glichstern	public hearing comments	I-Glichstern-04	HAZ-2
I-Glichstern	Anastasia Glichstern	public hearing comments	I-Glichstern-05	HAZ-1
I-Glichstern	Anastasia Glichstern	public hearing comments	I-Glichstern-06	HAZ-3
I-Glichstern	Anastasia Glichstern	public hearing comments	I-Glichstern-07	HAZ-1
I-Goggin	David E Goggin	letter	I-Goggin-01	AE-2
I-Goggin	David E Goggin	letter	I-Goggin-02	RE-1

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-Goggin	David E Goggin	letter	I-Goggin-03	AE-2
I-Goggin	David E Goggin	letter	I-Goggin-04	AE-2
I-Goggin	David E Goggin	letter	I-Goggin-05	AE-2, BIO-4
I-Goggin	David E Goggin	letter	I-Goggin-06	ALT-2
I-Goggin2	Dave Goggin	public hearing comments	I-Goggin2-01	AE-2
I-Goggin2	Dave Goggin	public hearing comments	I-Goggin2-02	BIO-4
I-Goggin2	Dave Goggin	public hearing comments	I-Goggin2-03	ALT-2
I-JeGoldberg	Jeremy Goldberg	email	I-JeGoldberg-01	PD-2
I-JoGoldberg	Jonathan Goldberg	public hearing comments	I-JoGoldberg-01	PP-2
I-JoGoldberg	Jonathan Goldberg	public hearing comments	I-JoGoldberg-02	LU-1
I-JoGoldberg	Jonathan Goldberg	public hearing comments	I-JoGoldberg-03	ALT-2
I-Green	Susan Green	email	I-Green-01	PD-2
I-Hahn	Thomas Hahn	letter	I-Hahn-01	PP-2, ALT-4
I-Hahn	Thomas Hahn	letter	I-Hahn-02	BIO-3
I-Hahn	Thomas Hahn	letter	I-Hahn-03	HAZ-2, HAZ-4
I-Hahn	Thomas Hahn	letter	I-Hahn-04	AE-2
I-Hahn	Thomas Hahn	letter	I-Hahn-05	BIO-4
I-Hahn	Thomas Hahn	letter	I-Hahn-06	PD-2
I-Hahn	Thomas Hahn	letter	I-Hahn-07	PD-2, PD-4
I-Hahn	Thomas Hahn	letter	I-Hahn-08	PP-2
I-Hall	Bob Hall	email	I-Hall-01	BIO-3
I-Hall	Bob Hall	email	I-Hall-02	BIO-4
I-Hall	Bob Hall	email	I-Hall-03	HAZ-2
I-Hall	Bob Hall	email	I-Hall-04	ALT-2, GC-2
I-Hall	Bob Hall	email	I-Hall-05	GC-2
I-Hansen	Eric Hansen	public hearing comments	I-Hansen-01	ERP-1
I-Hansen	Eric Hansen	public hearing comments	I-Hansen-02	CR-1
I-Hansen	Eric Hansen	public hearing comments	I-Hansen-03	PD-2
I-Hart	Paige Hart	email	I-Hart-01	PD-2
I-Hemphill	Pam Hemphill	letter	I-Hemphill-01	HAZ-1

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-Hemphill	Pam Hemphill	letter	I-Hemphill-02	PD-3
I-Hemphill2	Pam Hemphill	public hearing comments	I-Hemphill2-01	HAZ-1
I-Hicks	Tom Hicks	email	I-Hicks-01	AE-2
I-Hill	Steven Hill	email	I-Hill-01	AE-2, LU-1
I-Hillson	Rose Hillson	letter	I-Hillson-01	AE-1
I-Hillson	Rose Hillson	letter	I-Hillson-02	AE-3
I-Hillson	Rose Hillson	letter	I-Hillson-03	AE-2
I-Hillson	Rose Hillson	letter	I-Hillson-04	AE-3
I-Hillson	Rose Hillson	letter	I-Hillson-05	AE-2
I-Hillson	Rose Hillson	letter	I-Hillson-06	ALT-4
I-Hillson2	Rose Hillson	public hearing comments	I-Hillson2-01	AE-3
I-Hillson2	Rose Hillson	public hearing comments	I-Hillson2-02	AE-2
I-Hillson2	Rose Hillson	public hearing comments	I-Hillson2-03	AE-3
I-Hillson2	Rose Hillson	public hearing comments	I-Hillson2-04	AE-1
I-Hirsch	Susan Hirsch	public hearing comments	I-Hirsch-01	ERP-1
I-Hobbs	Helen Hobbs	email	I-Hobbs-01	PD-2
I-Hoffman	Martha Hoffman	public hearing comments	I-Hoffman-01	PP-2
I-Hoffman	Martha Hoffman	public hearing comments	I-Hoffman-02	BIO-3
I-Hoffman	Martha Hoffman	public hearing comments	I-Hoffman-03	PP-2
I-Horton	Inge Horton	email	I-Horton-01	AE-2, BIO-4
I-Horton	Inge Horton	email	I-Horton-02	CR-4, ERP-3
I-Horton	Inge Horton	email	I-Horton-03	ALT-4
I-Horton	Inge Horton	email	I-Horton-04	ESI-2, ERP-1
I-GIHoward	Glenn Howard, Jr., Ph.D.	letter	I-GIHoward-01	HYD-2
I-GIHoward	Glenn Howard, Jr., Ph.D.	letter	I-GIHoward-02	HYD-3
I-GIHoward	Glenn Howard, Jr., Ph.D.	letter	I-GIHoward-03	TR-2
I-GIHoward	Glenn Howard, Jr., Ph.D.	letter	I-GIHoward-04	TR-2
I-GIHoward	Glenn Howard, Jr., Ph.D.	letter	I-GIHoward-05	PD-4, TR-2
I-GIHoward	Glenn Howard, Jr., Ph.D.	letter	I-GIHoward-06	TR-2
I-GIHoward	Glenn Howard, Jr., Ph.D.	letter	I-GIHoward-07	PD-4, LU-1
I-GIHoward	Glenn Howard, Jr., Ph.D.	letter	I-GIHoward-08	PD-4

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-GIHoward	Glenn Howard, Jr., Ph.D.	letter	I-GIHoward-09	HAZ-2
I-GIHoward	Glenn Howard, Jr., Ph.D.	letter	I-GIHoward-10	HAZ-2, LU-1
I-GIHoward	Glenn Howard, Jr., Ph.D.	letter	I-GIHoward-11	GC-2
I-GIHoward	Glenn Howard, Jr., Ph.D.	letter	I-GIHoward-12	ALT-2
I-GIHoward	Glenn Howard, Jr., Ph.D.	letter	I-GIHoward-13	GC-2
I-GoHoward	Gordon Howard, Ph.D.	letter	I-GoHoward-01	ERP-3
I-GoHoward	Gordon Howard, Ph.D.	letter	I-GoHoward-02	ERP-3
I-GoHoward	Gordon Howard, Ph.D.	letter	I-GoHoward-03	HAZ-2
I-GoHoward	Gordon Howard, Ph.D.	letter	I-GoHoward-04	HAZ-4, HAZ-5
I-GoHoward	Gordon Howard, Ph.D.	letter	I-GoHoward-05	HYD-1
I-GoHoward	Gordon Howard, Ph.D.	letter	I-GoHoward-06	PD-4
I-GoHoward	Gordon Howard, Ph.D.	letter	I-GoHoward-07	LU-1
I-GoHoward	Gordon Howard, Ph.D.	letter	I-GoHoward-08	ERP-1
I-GoHoward	Gordon Howard, Ph.D.	letter	I-GoHoward-09	ALT-3, GC-2
I-GoHoward	Gordon Howard, Ph.D.	letter	I-GoHoward-10	LU-1
I-KHoward	Katherine Howard	Letter	I-KHoward-01	ESI-1, ERP-3
I-KHoward	Katherine Howard	Letter	I-KHoward-02	BIO-2
I-KHoward	Katherine Howard	Letter	I-KHoward-03	BIO-2
I-KHoward	Katherine Howard	Letter	I-KHoward-04	BIO-2
I-KHoward	Katherine Howard	Letter	I-KHoward-05	BIO-2
I-KHoward	Katherine Howard	Letter	I-KHoward-06	BIO-2
I-KHoward	Katherine Howard	Letter	I-KHoward-07	BIO-2
I-KHoward	Katherine Howard	Letter	I-KHoward-08	BIO-2, PP-2
I-KHoward	Katherine Howard	Letter	I-KHoward-09	BIO-2
I-KHoward	Katherine Howard	Letter	I-KHoward-10	BIO-2
I-KHoward	Katherine Howard	Letter	I-KHoward-11	BIO-2
I-KHoward	Katherine Howard	Letter	I-KHoward-12	BIO-2
I-KHoward	Katherine Howard	Letter	I-KHoward-13	BIO-2
I-KHoward	Katherine Howard	Letter	I-KHoward-14	BIO-2
I-Hurlbut	Rob Hurlbut	email	I-Hurlbut-01	PD-2
I-Hyde	Kathryn Hyde	email	I-Hyde-01	AE-2, BIO-4
I-Hyde	Kathryn Hyde	email	I-Hyde-02	LU-1, HAZ-4, BIO-3
I-Hyde	Kathryn Hyde	email	I-Hyde-03	HAZ-1
I-Hyde	Kathryn Hyde	email	I-Hyde-04	ALT-4
I-Hyde	Kathryn Hyde	email	I-Hyde-05	PD-4
I-Hyde	Kathryn Hyde	email	I-Hyde-06	AE-2

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-Hyde	Kathryn Hyde	email	I-Hyde-07	ESI-2
I-Ivanhoe	Richard Ivanhoe	letter	I-Ivanhoe-01	PD-2
I-Ivanhoe	Richard Ivanhoe	letter	I-Ivanhoe-02	ALT-5
I-Ivanhoe	Richard Ivanhoe	letter	I-Ivanhoe-03	ALT-2
I-Ivanhoe	Richard Ivanhoe	letter	I-Ivanhoe-04	ERP-1
I-Ivanhoe	Richard Ivanhoe	letter	I-Ivanhoe-05	AE-2
I-Ivanhoe	Richard Ivanhoe	letter	I-Ivanhoe-06	GC-2
I-Ivanhoe	Richard Ivanhoe	letter	I-Ivanhoe-07	HAZ-4, HYD-3
I-Ivanhoe2	Richard Ivanhoe	public hearing comments	I-Ivanhoe2-01	PD-3
I-Ivanhoe2	Richard Ivanhoe	public hearing comments	I-Ivanhoe2-02	PD-2
I-Ivanhoe2	Richard Ivanhoe	public hearing comments	I-Ivanhoe2-03	GC-2
I-Joaquin-Wood	Joan Joaquin-Wood	email	I-Joaquin-Wood-01	GC-2, PD-4
I-Joaquin-Wood	Joan Joaquin-Wood	email	I-Joaquin-Wood-02	HAZ-4
I-Joaquin-Wood	Joan Joaquin-Wood	email	I-Joaquin-Wood-03	BIO-2
I-Joaquin-Wood	Joan Joaquin-Wood	email	I-Joaquin-Wood-04	ESI-2
I-Johnson	Dominic Johnson	email	I-Johnson-01	ALT-1
I-Joyce	Sean Joyce	email	I-Joyce-01	LU-1
I-Joyce	Sean Joyce	email	I-Joyce-02	TR-3, ERP-3
I-Joyce	Sean Joyce	email	I-Joyce-03	ERP-1
I-Joyce	Sean Joyce	email	I-Joyce-04	BIO-2
I-Jungreis	Jason Jungreis	email	I-Jungreis-01	GC-1
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-01	ERP-1, ESI-2
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-02	HYD-2
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-03	HAZ-4
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-04	HAZ-4
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-05	HAZ-2
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-06	HAZ-2
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-07	GC-2
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-08	HYD-2
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-09	HAZ-4
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-10	HAZ-2
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-11	HAZ-2

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-12	HAZ-1
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-13	PP-3
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-14	PD-2
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-15	TR-3
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-16	BIO-3
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-17	BIO-4
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-18	BIO-4
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-19	BIO-3
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-20	ERP-1
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-21	CR-3
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-22	PD-2
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-23	PP-2
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-24	GC-2
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-25	ALT-1
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-26	AE-2
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-27	AE-2
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-28	BIO-3, ERP-3
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-29	GC-2
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-30	BIO-2
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-31	ERP-3
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-32	HAZ-1
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-33	ALT-1
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-34	ALT-5, PD-1, PP-1
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-35	GC-1
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-36	LU-1
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-37	AE-1
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-38	AE-1
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-39	PD-2
I-Jungreis2	Jason Jungreis	email	I-Jungreis2-40	TR-2
I-Kaspar	Trish Kaspar	letter	I-Kaspar-01	PP-2
I-Kaspar	Trish Kaspar	letter	I-Kaspar-02	ALT-2
I-Kaufman	Noel Kaufman	email	I-Kaufman-01	PD-2
I-Kaufman	Noel Kaufman	email	I-Kaufman-02	PD-2, BIO-2
I-Keegan	Bruce Keegan	email	I-Keegan-01	ALT-2, GC-2
I-Kessler	Janet Kessler	email	I-Kessler-01	ALT-2
I-Kessler	Janet Kessler	email	I-Kessler-02	ERP-1

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-Kessler	Janet Kessler	email	I-Kessler-03	BIO-3
I-Khan	Tehmina Khan	email	I-Khan-01	HAZ-4
I-Khan	Tehmina Khan	email	I-Khan-02	ALT-4
I-Khan	Tehmina Khan	email	I-Khan-03	AE-1
I-Khan	Tehmina Khan	email	I-Khan-04	BIO-2
I-Khan	Tehmina Khan	email	I-Khan-05	PD-4
I-Khan	Tehmina Khan	email	I-Khan-06	AE-2, BIO-4
I-Khan	Tehmina Khan	email	I-Khan-07	BIO-2
I-Khan	Tehmina Khan	email	I-Khan-08	ESI-2, RE-1
I-Khan	Tehmina Khan	email	I-Khan-09	PP-2
I-Khan	Tehmina Khan	email	I-Khan-10	BIO-2
I-Khan	Tehmina Khan	email	I-Khan-11	TR-1
I-Khan	Tehmina Khan	email	I-Khan-12	TR-4
I-Khan	Tehmina Khan	email	I-Khan-13	TR-2
I-Khan	Tehmina Khan	email	I-Khan-14	TR-3
I-Khan	Tehmina Khan	email	I-Khan-15	TR-1
I-Khan	Tehmina Khan	email	I-Khan-16	PD-4
I-Khan	Tehmina Khan	email	I-Khan-17	ALT-3
I-Khan	Tehmina Khan	email	I-Khan-18	PD-4, GC-2
I-Kirshenbaum	Noel Kirshenbaum	email	I-Kirshenbaum-01	GC-2, LU-1
I-Kirshenbaum	Noel Kirshenbaum	email	I-Kirshenbaum-02	GC-2, PD-4
I-Kohn	Marilyn Kohn	letter	I-Kohn-01	HAZ-4
I-Kohn2	Marilyn Kohn	letter	I-Kohn2-01	ERP-1
I-Kohn2	Marilyn Kohn	letter	I-Kohn2-02	AE-1, AE-2
I-Kohn2	Marilyn Kohn	letter	I-Kohn2-03	BIO-1
I-Kohn2	Marilyn Kohn	letter	I-Kohn2-04	PP-2
I-Kohn2	Marilyn Kohn	letter	I-Kohn2-05	ERP-2
I-Kohn2	Marilyn Kohn	letter	I-Kohn2-06	HYD-2
I-Kohn2	Marilyn Kohn	letter	I-Kohn2-07	AE-2
I-Kohn2	Marilyn Kohn	letter	I-Kohn2-08	BIO-4
I-Kohn2	Marilyn Kohn	letter	I-Kohn2-09	BIO-3
I-Kohn2	Marilyn Kohn	letter	I-Kohn2-10	BIO-1
I-Kohn2	Marilyn Kohn	letter	I-Kohn2-11	HYD-2, HYD-3, HAZ-5
I-Kohn2	Marilyn Kohn	letter	I-Kohn2-12	PP-3
I-Kohn2	Marilyn Kohn	letter	I-Kohn2-13	ERP-1
I-Koivisto	Ellen Koivisto	email	I-Koivisto-01	ERP-1, GC-1

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-Koivisto	Ellen Koivisto	email	I-Koivisto-02	BIO-2
I-Koivisto	Ellen Koivisto	email	I-Koivisto-03	ALT-2
I-Koivisto	Ellen Koivisto	email	I-Koivisto-04	ERP-3
I-Koivisto	Ellen Koivisto	email	I-Koivisto-05	BIO-2, BIO-3, BIO-4
I-Koivisto	Ellen Koivisto	email	I-Koivisto-06	PD-3
I-Koivisto	Ellen Koivisto	email	I-Koivisto-07	PD-3
I-Koivisto	Ellen Koivisto	email	I-Koivisto-08	PD-4
I-Koivisto	Ellen Koivisto	email	I-Koivisto-09	ERP-2
I-Koivisto	Ellen Koivisto	email	I-Koivisto-10	PP-4
I-Koivisto	Ellen Koivisto	email	I-Koivisto-11	PP-3, LU-1
I-Koivisto	Ellen Koivisto	email	I-Koivisto-12	PP-1
I-Koivisto	Ellen Koivisto	email	I-Koivisto-13	AE-3
I-Koivisto	Ellen Koivisto	email	I-Koivisto-14	AE-2
I-Koivisto	Ellen Koivisto	email	I-Koivisto-15	AE-1
I-Koivisto	Ellen Koivisto	email	I-Koivisto-16	AE-2
I-Koivisto	Ellen Koivisto	email	I-Koivisto-17	AE-1
I-Koivisto	Ellen Koivisto	email	I-Koivisto-18	AE-2
I-Koivisto	Ellen Koivisto	email	I-Koivisto-19	AE-1
I-Koivisto	Ellen Koivisto	email	I-Koivisto-20	AE-2
I-Koivisto	Ellen Koivisto	email	I-Koivisto-21	AE-2
I-Koivisto	Ellen Koivisto	email	I-Koivisto-22	AE-2
I-Koivisto	Ellen Koivisto	email	I-Koivisto-23	AE-2
I-Koivisto	Ellen Koivisto	email	I-Koivisto-24	AE-2
I-Koivisto	Ellen Koivisto	email	I-Koivisto-25	AE-3
I-Koivisto	Ellen Koivisto	email	I-Koivisto-26	AE-3, BIO-2
I-Koivisto	Ellen Koivisto	email	I-Koivisto-27	AE-2
I-Koivisto	Ellen Koivisto	email	I-Koivisto-28	AE-2
I-Koivisto	Ellen Koivisto	email	I-Koivisto-29	AE-2, BIO-4
I-Koivisto	Ellen Koivisto	email	I-Koivisto-30	AE-2, BIO-4
I-Koivisto	Ellen Koivisto	email	I-Koivisto-31	CR-1
I-Koivisto	Ellen Koivisto	email	I-Koivisto-32	CR-1
I-Koivisto	Ellen Koivisto	email	I-Koivisto-33	ERP-1
I-Koivisto	Ellen Koivisto	email	I-Koivisto-34	AE-2, LU-1
I-Koivisto	Ellen Koivisto	email	I-Koivisto-35	TR-4
I-Koivisto	Ellen Koivisto	email	I-Koivisto-36	TR-2
I-Koivisto	Ellen Koivisto	email	I-Koivisto-37	ERP-3

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-Koivisto	Ellen Koivisto	email	I-Koivisto-38	TR-1
I-Koivisto	Ellen Koivisto	email	I-Koivisto-39	AE-2
I-Koivisto	Ellen Koivisto	email	I-Koivisto-40	ERP-1
I-Koivisto	Ellen Koivisto	email	I-Koivisto-41	PD-2
I-Koivisto	Ellen Koivisto	email	I-Koivisto-42	BIO-3
I-Koivisto	Ellen Koivisto	email	I-Koivisto-43	RE-1
I-Koivisto	Ellen Koivisto	email	I-Koivisto-44	RE-1
I-Koivisto	Ellen Koivisto	email	I-Koivisto-45	LU-1, BIO-4
I-Koivisto	Ellen Koivisto	email	I-Koivisto-46	ERP-1, LU-1
I-Koivisto	Ellen Koivisto	email	I-Koivisto-47	ALT-2
I-Koivisto	Ellen Koivisto	email	I-Koivisto-48	PP-2
I-Koivisto	Ellen Koivisto	email	I-Koivisto-49	HYD-3
I-Koivisto	Ellen Koivisto	email	I-Koivisto-50	TR-3
I-Koivisto	Ellen Koivisto	email	I-Koivisto-51	ERP-3
I-Koivisto	Ellen Koivisto	email	I-Koivisto-52	AE-2
I-Koivisto	Ellen Koivisto	email	I-Koivisto-53	BIO-3
I-Koivisto	Ellen Koivisto	email	I-Koivisto-54	BIO-2
I-Koivisto	Ellen Koivisto	email	I-Koivisto-55	BIO-3
I-Koivisto	Ellen Koivisto	email	I-Koivisto-56	BIO-3
I-Koivisto	Ellen Koivisto	email	I-Koivisto-57	BIO-3
I-Koivisto	Ellen Koivisto	email	I-Koivisto-58	BIO-3, BIO-4
I-Koivisto	Ellen Koivisto	email	I-Koivisto-59	BIO-3
I-Koivisto	Ellen Koivisto	email	I-Koivisto-60	BIO-2
I-Koivisto	Ellen Koivisto	email	I-Koivisto-61	BIO-3, BIO-4
I-Koivisto	Ellen Koivisto	email	I-Koivisto-62	BIO-3
I-Koivisto	Ellen Koivisto	email	I-Koivisto-63	HAZ-5, HYD-3
I-Koivisto	Ellen Koivisto	email	I-Koivisto-64	HAZ-4
I-Koivisto	Ellen Koivisto	email	I-Koivisto-65	HYD-1
I-Koivisto	Ellen Koivisto	email	I-Koivisto-66	HAZ-4
I-Koivisto	Ellen Koivisto	email	I-Koivisto-67	HAZ-4
I-Koivisto	Ellen Koivisto	email	I-Koivisto-68	HAZ-6
I-Koivisto	Ellen Koivisto	email	I-Koivisto-69	HAZ-4
I-Koivisto	Ellen Koivisto	email	I-Koivisto-70	HAZ-3
I-Koivisto	Ellen Koivisto	email	I-Koivisto-71	HAZ-2
I-Koivisto	Ellen Koivisto	email	I-Koivisto-72	ERP-3
I-Koivisto	Ellen Koivisto	email	I-Koivisto-73	HAZ-4, HAZ-5, HYD-1

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-Koivisto	Ellen Koivisto	email	I-Koivisto-74	ALT-2
I-Koivisto2	Ellen Koivisto	public hearing comments	I-Koivisto2-01	AE-2
I-Koivisto2	Ellen Koivisto	public hearing comments	I-Koivisto2-02	AE-2
I-Koivisto2	Ellen Koivisto	public hearing comments	I-Koivisto2-03	AE-2
I-Koivisto2	Ellen Koivisto	public hearing comments	I-Koivisto2-04	AE-2
I-Koivisto2	Ellen Koivisto	public hearing comments	I-Koivisto2-05	BIO-2
I-Koivisto2	Ellen Koivisto	public hearing comments	I-Koivisto2-06	BIO-2
I-Koivisto2	Ellen Koivisto	public hearing comments	I-Koivisto2-07	BIO-3
I-Kuhn	Thomas Kuhn	email	I-Kuhn-01	CR-3
I-Kuhn	Thomas Kuhn	email	I-Kuhn-02	AE-1, AE-3
I-Kuhn2	Thomas Kuhn	email	I-Kuhn2-01	GC-1
I-Kukatla	Rakesh Kukatla	email	I-Kukatla-01	ALT-5
I-Kukatla	Rakesh Kukatla	email	I-Kukatla-02	AE-1
I-Kukatla	Rakesh Kukatla	email	I-Kukatla-03	TR-3
I-Kukatla	Rakesh Kukatla	email	I-Kukatla-04	BIO-2
I-Kushner	Pinky Kushner	letter	I-Kushner-01	PD-1
I-Kushner	Pinky Kushner	letter	I-Kushner-02	PD-1
I-Kushner	Pinky Kushner	letter	I-Kushner-03	ERP-1
I-Kushner	Pinky Kushner	letter	I-Kushner-04	ERP-1
I-Kushner	Pinky Kushner	letter	I-Kushner-05	ERP-1
I-Kushner2	Pinky Kushner	public hearing comments	I-Kushner2-01	ERP-1
I-Kushner2	Pinky Kushner	public hearing comments	I-Kushner2-02	LU-1
I-Kushner2	Pinky Kushner	public hearing comments	I-Kushner2-03	PD-3
I-Lampert	Gabriel Lampert	email	I-Lampert-01	AE-2
I-Lampert	Gabriel Lampert	email	I-Lampert-02	TR-2
I-Lampert	Gabriel Lampert	email	I-Lampert-03	TR-3
I-Lampert	Gabriel Lampert	email	I-Lampert-04	BIO-2
I-Lampert	Gabriel Lampert	email	I-Lampert-05	TR-4
I-Lampert2	Gabriel Lampert	email	I-Lampert2-01	ERP-3
I-Lampert2	Gabriel Lampert	email	I-Lampert2-02	GC-2, ALT-5

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-Lampert2	Gabriel Lampert	email	I-Lampert2-03	PD-3, ALT-5
I-Lampert2	Gabriel Lampert	email	I-Lampert2-04	ALT-5
I-ELang	Eden Lang	email	I-ELang-01	BIO-2
I-NLang	Nathan Lang	email	I-NLang-01	BIO-2
I-NLang	Nathan Lang	email	I-NLang-02	LU-1
I-NLang	Nathan Lang	email	I-NLang-03	ALT-4
I-Lawrence	Steve Lawrence	email	I-Lawrence-01	ERP-1
I-Learner	Deborah Learner	letter	I-Learner-01	PD-2, PP-2
I-Learner	Deborah Learner	letter	I-Learner-02	PD-1, PP-2
I-Learner	Deborah Learner	letter	I-Learner-03	PP-2
I-Learner	Deborah Learner	letter	I-Learner-04	PP-2
I-Learner	Deborah Learner	letter	I-Learner-05	GC-1
I-Learner	Deborah Learner	letter	I-Learner-06	CR-2
I-Learner	Deborah Learner	letter	I-Learner-07	ERP-1
I-Learner	Deborah Learner	letter	I-Learner-08	PP-2
I-Learner	Deborah Learner	letter	I-Learner-09	GC-2
I-Learner	Deborah Learner	letter	I-Learner-10	PP-2
I-Learner	Deborah Learner	letter	I-Learner-11	LU-1
I-Learner	Deborah Learner	letter	I-Learner-12	PD-4
I-Learner	Deborah Learner	letter	I-Learner-13	PD-1
I-Learner	Deborah Learner	letter	I-Learner-14	CR-6
I-Learner	Deborah Learner	letter	I-Learner-15	PD-4
I-Learner	Deborah Learner	letter	I-Learner-16	HAZ-4, HAZ-5
I-Learner	Deborah Learner	letter	I-Learner-17	AE-1
I-Learner	Deborah Learner	letter	I-Learner-18	AE-2
I-Learner	Deborah Learner	letter	I-Learner-19	GC-1
I-Learner	Deborah Learner	letter	I-Learner-20	ERP-1
I-Learner	Deborah Learner	letter	I-Learner-21	PD-4
I-Leifheit	Lex Leifheit	email	I-Leifheit-01	AE-2
I-Leifheit	Lex Leifheit	email	I-Leifheit-02	LU-1
I-Letofsky	Larry Letofsky	email	I-Letofsky-01	LU-1
I-BLewis	Beth Lewis	email	I-BLewis-01	PP-2
I-BLewis	Beth Lewis	email	I-BLewis-02	ALT-4
I-BLewis	Beth Lewis	email	I-BLewis-03	BIO-2
I-BLewis	Beth Lewis	email	I-BLewis-04	HAZ-4
I-BLewis	Beth Lewis	email	I-BLewis-05	HAZ-2

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-BLewis	Beth Lewis	email	I-BLewis-06	GC-2, PD-4
I-BLewis	Beth Lewis	email	I-BLewis-07	AE-2
I-BLewis	Beth Lewis	email	I-BLewis-08	BIO-4
I-BLewis	Beth Lewis	email	I-BLewis-09	PD-2
I-BLewis	Beth Lewis	email	I-BLewis-10	PP-2
I-NLewis	Nancy Lewis	letter	I-NLewis-01	ALT-4
I-NLewis	Nancy Lewis	letter	I-NLewis-02	TR-2, TR-3
I-NLewis	Nancy Lewis	letter	I-NLewis-03	ALT-5
I-Lieb	Reddy Lieb	letter	I-Lieb-01	PP-2, ALT-4
I-Lieb	Reddy Lieb	letter	I-Lieb-02	BIO-2, HAZ-4
I-Lieb	Reddy Lieb	letter	I-Lieb-03	AE-2, BIO-4
I-Lieb	Reddy Lieb	letter	I-Lieb-04	PP-2
I-Lissak	Ron Lissak	email	I-Lissak-01	PD-2
I-Litehiser	Linda Stark Litehiser	email/letter	I-Litehiser-01	PP-2
I-Litehiser	Linda Stark Litehiser	email/letter	I-Litehiser-02	PD-4
I-Litehiser	Linda Stark Litehiser	email/letter	I-Litehiser-03	ALT-2
I-Litehiser	Linda Stark Litehiser	email/letter	I-Litehiser-04	GC-2
I-Litehiser	Linda Stark Litehiser	email/letter	I-Litehiser-05	PD-4
I-Livas	Rico Livas	email	I-Livas-01	HAZ-1
I-Lockwood	Dan Lockwood	email	I-Lockwood-01	PD-2
I-Louey	Man Kwong Louey	email	I-Louey-01	LU-1
I-Lounsbury	Jill Lounsbury	email	I-Lounsbury-01	PD-2
I-Lounsbury	Jill Lounsbury	email	I-Lounsbury-02	ALT-5
I-Lounsbury	Jill Lounsbury	email	I-Lounsbury-03	PD-2
I-Lounsbury	Jill Lounsbury	email	I-Lounsbury-04	PD-2
I-Lounsbury	Jill Lounsbury	email	I-Lounsbury-05	PP-2
I-Lounsbury	Jill Lounsbury	email	I-Lounsbury-06	HAZ-1
I-Mabbutt	Anmarie Mabbutt	email	I-Mabutt-01	LU-1, ALT-4, PP-2, BIO-2
I-Mabbutt	Anmarie Mabbutt	email	I-Mabutt-02	GC-2
I-Mabbutt	Anmarie Mabbutt	email	I-Mabutt-03	CR-1
I-Mabbutt	Anmarie Mabbutt	email	I-Mabutt-04	ESI-2, ERP-1
I-Madrigal	Marcia Madrigal	public hearing comments	I-Madrigal-01	PD-2
I-Mayora	Edgar Mayora	public hearing comments	I-Mayora-01	PD-2
I-McCowin	Kathleen McCowin	email	I-McCowin-01	PD-3
I-McCowin	Kathleen McCowin	email	I-McCowin-02	ALT-4

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-McCowan	Kathleen McCowan	email	I-McCowan-03	HAZ-1
I-McCowan	Kathleen McCowan	email	I-McCowan-04	BIO-3, BIO-4
I-McCowan	Kathleen McCowan	email	I-McCowan-05	LU-1
I-McCowan	Kathleen McCowan	email	I-McCowan-06	ALT-4
I-McDevitt	Terry McDevitt	email	I-McDevitt-01	ERP-3
I-McDevitt	Terry McDevitt	email	I-McDevitt-02	BIO-3
I-McDevitt	Terry McDevitt	email	I-McDevitt-03	HYD-2
I-McDevitt	Terry McDevitt	email	I-McDevitt-04	PD-4
I-McDevitt	Terry McDevitt	email	I-McDevitt-05	GC-2
I-McDevitt	Terry McDevitt	email	I-McDevitt-06	AE-1, CR-2, LU-1, AE-2
I-McGrew	Shawna McGrew	email	I-McGrew-01	ALT-3, ALT-5
I-McGrew	Shawna McGrew	email	I-McGrew-02	PD-3
I-McGrew	Shawna McGrew	email	I-McGrew-03	GC-2
I-McGrew	Shawna McGrew	email	I-McGrew-04	PD-4
I-McGrew	Shawna McGrew	email	I-McGrew-05	HAZ-4
I-McGrew	Shawna McGrew	email	I-McGrew-06	HAZ-1, HAZ-2
I-McGrew	Shawna McGrew	email	I-McGrew-07	TR-1
I-McGrew	Shawna McGrew	email	I-McGrew-08	PD-2
I-McGrew	Shawna McGrew	email	I-McGrew-09	TR-2
I-McGrew	Shawna McGrew	email	I-McGrew-10	TR-3
I-McGrew	Shawna McGrew	email	I-McGrew-11	TR-2
I-McGrew	Shawna McGrew	email	I-McGrew-12	ERP-3
I-McGrew	Shawna McGrew	email	I-McGrew-13	TR-2
I-McGrew	Shawna McGrew	email	I-McGrew-14	BIO-3
I-McGrew	Shawna McGrew	email	I-McGrew-15	BIO-2
I-McGrew	Shawna McGrew	email	I-McGrew-16	ALT-1
I-McGrew2	Shawna McGrew	letter	I-McGrew2-01	GC-1
I-McGrew3	Shawna McGrew	public hearing comments	I-McGrew3-01	LU-1
I-Meidinger	Roger Meidinger	email	I-Meidinger-01	AE-2
I-GMiller	Greg Miller	letter	I-GMiller-01	LU-1
I-GMiller	Greg Miller	letter	I-GMiller-02	AE-1
I-GMiller	Greg Miller	letter	I-GMiller-03	CR-1, LU-1
I-GMiller	Greg Miller	letter	I-GMiller-04	CR-1
I-GMiller	Greg Miller	letter	I-GMiller-05	AE-1
I-GMiller	Greg Miller	letter	I-GMiller-06	ALT-1

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-GMiller	Greg Miller	letter	I-GMiller-07	AE-3
I-GMiller	Greg Miller	letter	I-GMiller-08	AE-3
I-GMiller	Greg Miller	letter	I-GMiller-09	AE-3
I-GMiller	Greg Miller	letter	I-GMiller-10	AE-2
I-GMiller	Greg Miller	letter	I-GMiller-11	AE-1
I-GMiller	Greg Miller	letter	I-GMiller-12	CR-5
I-GMiller	Greg Miller	letter	I-GMiller-13	CR-5
I-GMiller	Greg Miller	letter	I-GMiller-14	CR-3
I-GMiller	Greg Miller	letter	I-GMiller-15	CR-3
I-GMiller	Greg Miller	letter	I-GMiller-16	AE-2, AE-3
I-GMiller	Greg Miller	letter	I-GMiller-17	AE-2
I-GMiller2	Greg Miller	letter	I-GMiller2-01	AE-2
I-GMiller2	Greg Miller	letter	I-GMiller2-02	AE-1
I-GMiller2	Greg Miller	letter	I-GMiller2-03	AE-1
I-GMiller2	Greg Miller	letter	I-GMiller2-04	AE-1
I-GMiller2	Greg Miller	letter	I-GMiller2-05	AE-2
I-GMiller2	Greg Miller	letter	I-GMiller2-06	AE-2
I-GMiller2	Greg Miller	letter	I-GMiller2-07	AE-2
I-GMiller2	Greg Miller	letter	I-GMiller2-08	AE-2
I-GMiller2	Greg Miller	letter	I-GMiller2-09	AE-2
I-GMiller2	Greg Miller	letter	I-GMiller2-10	AE-2
I-GMiller2	Greg Miller	letter	I-GMiller2-11	AE-1
I-GMiller2	Greg Miller	letter	I-GMiller2-12	AE-2, AE-3
I-GMiller2	Greg Miller	letter	I-GMiller2-13	AE-2
I-GMiller2	Greg Miller	letter	I-GMiller2-14	AE-2
I-GMiller2	Greg Miller	letter	I-GMiller2-15	AE-2
I-GMiller3	Greg Miller	letter	I-GMiller3-01	PD-4
I-GMiller3	Greg Miller	letter	I-GMiller3-02	BIO-2
I-GMiller3	Greg Miller	letter	I-GMiller3-03	AE-1
I-GMiller3	Greg Miller	letter	I-GMiller3-04	PD-4
I-GMiller3	Greg Miller	letter	I-GMiller3-05	PD-3
I-GMiller3	Greg Miller	letter	I-GMiller3-06	PD-3
I-GMiller3	Greg Miller	letter	I-GMiller3-07	PD-4
I-GMiller3	Greg Miller	letter	I-GMiller3-08	PD-3
I-GMiller3	Greg Miller	letter	I-GMiller3-09	PD-3
I-GMiller3	Greg Miller	letter	I-GMiller3-10	PD-4

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-GMiller4	Greg Miller	public hearing comments	I-GMiller4-01	AE-2
I-GMiller4	Greg Miller	public hearing comments	I-GMiller4-02	AE-3
I-GMiller4	Greg Miller	public hearing comments	I-GMiller4-03	CR-5
I-MMiller	Mary Anne Miller	public hearing comments	I-MMiller-01	PD-1
I-MMiller	Mary Anne Miller	public hearing comments	I-MMiller-02	PD-1
I-MMiller	Mary Anne Miller	public hearing comments	I-MMiller-03	ALT-2
I-MMiller	Mary Anne Miller	public hearing comments	I-MMiller-04	ESI-2
I-MMiller	Mary Anne Miller	public hearing comments	I-MMiller-05	PD-2
I-Minivielle	Albert Minivielle	email	I-Minivielle-01	PD-4
I-Mora	Leo Mora	email	I-Mora-01	GC-1
I-Mosgofian	Denis Mosgofian	letter	I-Mosgofian-01	PD-2
I-Mosgofian	Denis Mosgofian	letter	I-Mosgofian-02	PP-2
I-Mosgofian	Denis Mosgofian	letter	I-Mosgofian-03	ERP-1
I-Mosgofian	Denis Mosgofian	letter	I-Mosgofian-04	GC-2
I-Mosgofian	Denis Mosgofian	letter	I-Mosgofian-05	CR-5
I-Mosgofian	Denis Mosgofian	letter	I-Mosgofian-06	GC-2
I-Mosgofian	Denis Mosgofian	letter	I-Mosgofian-07	ALT-2
I-Mosgofian2	Dennis Mosgofian	public hearing comments	I-Mosgofian2-01	ERP-1
I-Mosgofian2	Dennis Mosgofian	public hearing comments	I-Mosgofian2-02	LU-1
I-Mosgofian2	Dennis Mosgofian	public hearing comments	I-Mosgofian2-03	ALT-2
I-Mosgofian2	Dennis Mosgofian	public hearing comments	I-Mosgofian2-04	LU-1
I-Mosgofian2	Dennis Mosgofian	public hearing comments	I-Mosgofian2-05	ERP-1
I-Moss	Rasa Gustaitis (Moss)	letter	I-Moss-01	PP-2
I-Moss	Rasa Gustaitis (Moss)	letter	I-Moss-02	ERP-1
I-Moss	Rasa Gustaitis (Moss)	letter	I-Moss-03	ALT-1
I-Moss	Rasa Gustaitis (Moss)	letter	I-Moss-04	ESI-2
I-Moss	Rasa Gustaitis (Moss)	letter	I-Moss-05	HAZ-4
I-Moss	Rasa Gustaitis (Moss)	letter	I-Moss-06	GC-2

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-Moss	Rasa Gustaitis (Moss)	letter	I-Moss-07	HAZ-2
I-Moss2	Rasa Moss	public hearing comments	I-Moss2-01	ERP-1, ESI-2
I-Moss2	Rasa Moss	public hearing comments	I-Moss2-02	LU-1
I-Moss2	Rasa Moss	public hearing comments	I-Moss2-03	BIO-3
I-Moss2	Rasa Moss	public hearing comments	I-Moss2-04	BIO-3
I-Moss2	Rasa Moss	public hearing comments	I-Moss2-05	BIO-4
I-Moss2	Rasa Moss	public hearing comments	I-Moss2-06	PD-4
I-Moss2	Rasa Moss	public hearing comments	I-Moss2-07	HAZ-4
I-Moss2	Rasa Moss	public hearing comments	I-Moss2-08	ALT-2
I-Mudge	Jane Mudge	public hearing comments	I-Mudge-01	PD-2
I-Murphy	Dan Murphy	letter	I-Murphy-01	BIO-1
I-Murphy	Dan Murphy	letter	I-Murphy-02	BIO-1, BIO-3
I-Murphy	Dan Murphy	letter	I-Murphy-03	BIO-3, BIO-4
I-Murphy	Dan Murphy	letter	I-Murphy-04	BIO-4
I-Murphy	Dan Murphy	letter	I-Murphy-05	BIO-4
I-Murphy	Dan Murphy	letter	I-Murphy-06	BIO-4
I-Murphy	Dan Murphy	letter	I-Murphy-07	BIO-3
I-Murphy	Dan Murphy	letter	I-Murphy-08	BIO-3
I-Murphy	Dan Murphy	letter	I-Murphy-09	BIO-3
I-Murphy	Dan Murphy	letter	I-Murphy-10	BIO-3
I-Murphy	Dan Murphy	letter	I-Murphy-11	ALT-2, ALT-5
I-Murphy2	Dan Murphy	email	I-Murphy2-01	BIO-4
I-Myers	Anna Myers	public hearing comments	I-Myers-01	HAZ-4
I-Myers	Anna Myers	public hearing comments	I-Myers-02	AE-2
I-Myers	Anna Myers	public hearing comments	I-Myers-03	LU-1
I-Napoli	Jerome Napoli	email	I-Napoli-01	HAZ-4, BIO-3, BIO-2
I-Napoli	Jerome Napoli	email	I-Napoli-02	GC-2, ALT-2
I-Newman	John Newman	public hearing comments	I-Newman-01	PD-2

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-O'Dell	John O'Dell	public hearing comments	I-O'Dell-01	BIO-4
I-Ogilvie	Alan Ogilvie	letter	I-Ogilvie-01	LU-1
I-Ogilvie	Alan Ogilvie	letter	I-Ogilvie-02	HAZ-1
I-Ogilvie	Alan Ogilvie	letter	I-Ogilvie-03	HAZ-1
I-Ogilvie	Alan Ogilvie	letter	I-Ogilvie-04	ALT-2
I-Ogilvie	Alan Ogilvie	letter	I-Ogilvie-05	PD-4
I-Ogilvie	Alan Ogilvie	letter	I-Ogilvie-06	TR-2
I-Ogilvie	Alan Ogilvie	letter	I-Ogilvie-07	PD-4
I-Ogilvie	Alan Ogilvie	letter	I-Ogilvie-08	AE-2, AE-4
I-Ogilvie	Alan Ogilvie	letter	I-Ogilvie-09	ERP-3
I-Ogilvie	Alan Ogilvie	letter	I-Ogilvie-10	PD-4
I-Ogilvie	Alan Ogilvie	letter	I-Ogilvie-11	GC-3
I-Ogilvie	Alan Ogilvie	letter	I-Ogilvie-12	LU-1
I-Ogilvie	Alan Ogilvie	letter	I-Ogilvie-13	TR-3
I-Ogilvie2	Alan Ogilvie	email	I-Ogilvie2-01	GC-1
I-O'Leary	Andrea & Rick O'Leary	email	I-O'Leary-01	PD-1
I-O'Leary	Andrea & Rick O'Leary	email	I-O'Leary-02	GC-2, CR-3
I-O'Leary	Andrea & Rick O'Leary	email	I-O'Leary-03	ALT-3
I-O'Leary	Andrea & Rick O'Leary	email	I-O'Leary-04	AE-2
I-O'Leary	Andrea & Rick O'Leary	email	I-O'Leary-05	ERP-3
I-O'Leary	Andrea & Rick O'Leary	email	I-O'Leary-06	PP-2
I-O'Leary	Andrea & Rick O'Leary	email	I-O'Leary-07	PD-4
I-O'Leary	Andrea & Rick O'Leary	email	I-O'Leary-08	BIO-3
I-O'Leary	Andrea & Rick O'Leary	email	I-O'Leary-09	HYD-3
I-O'Leary	Andrea & Rick O'Leary	email	I-O'Leary-10	ERP-3
I-O'Leary	Andrea & Rick O'Leary	email	I-O'Leary-11	TR-2
I-O'Leary	Andrea & Rick O'Leary	email	I-O'Leary-12	TR-4
I-O'Leary	Andrea & Rick O'Leary	email	I-O'Leary-13	PD-4
I-O'Leary2	Andrea O'Leary	public hearing comments	I-O'Leary2-01	AE-2
I-Olivas	Ric Olivas	public hearing comments	I-Olivas-01	HAZ-1
I-Olivas	Ric Olivas	public hearing comments	I-Olivas-02	HAZ-2
I-O'Rorke	Dennis O'Rorke	email	I-O'Rorke-01	BIO-3, AE-2, BIO-4
I-O'Rorke	Dennis O'Rorke	email	I-O'Rorke-02	LU-1
I-Paskey	Candice Paskey	letter	I-Paskey-01	ALT-1

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-Pattillo	Chris Pattillo	letter	I-Pattillo-01	ALT-1
I-Pattillo	Chris Pattillo	letter	I-Pattillo-02	CR-3, LU-1
I-Pattillo	Chris Pattillo	letter	I-Pattillo-03	ESI-2
I-Pattillo	Chris Pattillo	letter	I-Pattillo-04	CR-6
I-Pattillo	Chris Pattillo	letter	I-Pattillo-05	GC-2
I-Pattillo	Chris Pattillo	letter	I-Pattillo-06	CR-1
I-Pattillo	Chris Pattillo	letter	I-Pattillo-07	ALT-4
I-Pattillo	Chris Pattillo	letter	I-Pattillo-08	ALT-2
I-Pattillo	Chris Pattillo	letter	I-Pattillo-09	ALT-1
I-Pattillo2	Chris Pattillo	letter	I-Pattillo2-01	CR-2
I-Pattillo2	Chris Pattillo	letter	I-Pattillo2-02	ALT-1
I-Pattillo2	Chris Pattillo	letter	I-Pattillo2-03	ALT-2
I-Pattillo2	Chris Pattillo	letter	I-Pattillo2-04	ESI-2
I-Pattillo2	Chris Pattillo	letter	I-Pattillo2-05	ALT-2
I-Pattillo3	Chris Pattillo	public hearing comments	I-Pattillo3-01	CR-3
I-Pertcheck	Edward Pertcheck	letter	I-Pertcheck-01	HAZ-4
I-Pertcheck	Edward Pertcheck	letter	I-Pertcheck-02	HAZ-2, HAZ-4
I-Pertcheck	Edward Pertcheck	letter	I-Pertcheck-03	ALT-2
I-Pertcheck2	Edward Pertcheck	public hearing comments	I-Pertcheck2-01	HAZ-4
I-Pertcheck2	Edward Pertcheck	public hearing comments	I-Pertcheck2-02	HAZ-2, GC-2
I-Pfister	Charles Pfister	email	I-Pfister-01	ALT-4
I-Pfister	Charles Pfister	email	I-Pfister-02	AE-2
I-Pfister	Charles Pfister	email	I-Pfister-03	ERP-1, ALT-1
I-Pfister	Charles Pfister	email	I-Pfister-04	BIO-4, AE-2
I-Pinchuk	Miriam Pinchuk	letter	I-Pinchuk-01	HAZ-4
I-Pinchuk	Miriam Pinchuk	letter	I-Pinchuk-02	HAZ-4
I-Pinchuk	Miriam Pinchuk	letter	I-Pinchuk-03	HAZ-4
I-Pinchuk	Miriam Pinchuk	letter	I-Pinchuk-04	HAZ-4
I-Pinchuk	Miriam Pinchuk	letter	I-Pinchuk-05	HAZ-1, HAZ-4
I-Pinchuk2	Miriam Pinchuk	public hearing comments	I-Pinchuk2-01	HAZ-1, HAZ-4
I-Posthumus	Yope (Johannes) Posthumus	email	I-Posthumus-01	CR-3
I-Posthumus	Yope (Johannes) Posthumus	email	I-Posthumus-02	AE-1, AE-3
I-Posthumus	Yope (Johannes) Posthumus	email	I-Posthumus-03	ALT-4

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-Posthumus2	Yoype Posthumus	public hearing comments	I-Posthumus2-01	PP-2
I-Posthumus2	Yoype Posthumus	public hearing comments	I-Posthumus2-02	HYD-2
I-Posthumus2	Yoype Posthumus	public hearing comments	I-Posthumus2-03	BIO-4
I-Posthumus2	Yoype Posthumus	public hearing comments	I-Posthumus2-04	LU-1
I-Queliza	Emily Queliza	public hearing comments	I-Queliza-01	PD-2
I-Rappolt	Toby Rappolt	email	I-Rappolt-01	PD-2
I-Ray	Jamie Ray	letter	I-Ray-01	LU-1
I-Ray	Jamie Ray	letter	I-Ray-02	PD-3
I-Ray	Jamie Ray	letter	I-Ray-03	HAZ-1
I-Ray	Jamie Ray	letter	I-Ray-04	HAZ-1
I-Ray	Jamie Ray	letter	I-Ray-05	ALT-2
I-Ray	Jamie Ray	letter	I-Ray-06	PD-4
I-Ray	Jamie Ray	letter	I-Ray-07	TR-2
I-Ray	Jamie Ray	letter	I-Ray-08	PD-4
I-Ray	Jamie Ray	letter	I-Ray-09	AE-2, AE-4
I-Ray	Jamie Ray	letter	I-Ray-10	ERP-3
I-Ray	Jamie Ray	letter	I-Ray-11	PD-4
I-Ray	Jamie Ray	letter	I-Ray-12	GC-1
I-Ray	Jamie Ray	letter	I-Ray-13	LU-1
I-Ray	Jamie Ray	letter	I-Ray-14	TR-3
I-Ray2	Jamie Ray	letter	I-Ray2-01	TR-3, PD-4, AE-2, ERP-3
I-Ray3	Jamie Ray	letter	I-Ray3-01	ALT-2
I-Ray3	Jamie Ray	letter	I-Ray3-02	GC-2
I-Ray3	Jamie Ray	letter	I-Ray3-03	ERP-2
I-Ray3	Jamie Ray	letter	I-Ray3-04	PP-2
I-Ray3	Jamie Ray	letter	I-Ray3-05	ALT-2
I-Ray3	Jamie Ray	letter	I-Ray3-06	GC-2
I-Ray3	Jamie Ray	letter	I-Ray3-07	ALT-2, GC-2, PD-2
I-Ray3	Jamie Ray	letter	I-Ray3-08	LU-1
I-Ray3	Jamie Ray	letter	I-Ray3-09	ALT-5
I-Ray3	Jamie Ray	letter	I-Ray3-10	PD-4
I-Ray3	Jamie Ray	letter	I-Ray3-11	PD-4

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-Ray3	Jamie Ray	letter	I-Ray3-12	PD-4, ERP-3
I-Ray3	Jamie Ray	letter	I-Ray3-13	HYD-2
I-Ray3	Jamie Ray	letter	I-Ray3-14	PP-4
I-Ray4	Jamie Ray	email	I-Ray4-01	ERP-1, ERP-2
I-Ray4	Jamie Ray	email	I-Ray4-02	BIO-4
I-Ray4	Jamie Ray	email	I-Ray4-03	BIO-4
I-Ray4	Jamie Ray	email	I-Ray4-04	PP-4
I-Ray4	Jamie Ray	email	I-Ray4-05	GC-2
I-Ray4	Jamie Ray	email	I-Ray4-06	ALT-2
I-Ray5	Jamie Ray	email	I-Ray5-01	ALT-2
I-Ray6	Jamie Ray	email	I-Ray6-01	AE-2
I-Ray6	Jamie Ray	email	I-Ray6-02	BIO-4
I-Reid	Patricia Reid	email	I-Reid-01	ALT-5
I-Reid	Patricia Reid	email	I-Reid-02	BIO-1
I-Richards	Renee Richards	email	I-Richards-01	ALT-4
I-Richards	Renee Richards	email	I-Richards-02	ERP-1
I-Richards	Renee Richards	email	I-Richards-03	BIO-3, ALT-2
I-Richards	Renee Richards	email	I-Richards-04	AE-2
I-Richards	Renee Richards	email	I-Richards-05	BIO-4
I-Richards	Renee Richards	email	I-Richards-06	HAZ-2
I-Richards	Renee Richards	email	I-Richards-07	HAZ-5
I-Richards	Renee Richards	email	I-Richards-08	ALT-2
I-Richards	Renee Richards	email	I-Richards-09	LU-1
I-Richards	Renee Richards	email	I-Richards-10	ALT-3, ALT4
I-Richman	Dan Richman	letter	I-Richman-01	BIO-3, BIO-4
I-Richman	Dan Richman	letter	I-Richman-02	AE-2
I-Richman	Dan Richman	letter	I-Richman-03	AE-1, AE-2
I-Richman	Dan Richman	letter	I-Richman-04	ERP-1, TR-2, TR-3
I-Richman	Dan Richman	letter	I-Richman-05	TR-2
I-Richman	Dan Richman	letter	I-Richman-06	LU-1
I-Richman	Dan Richman	letter	I-Richman-07	PD-4
I-Richman	Dan Richman	letter	I-Richman-08	GC-2, ERP-2
I-Richman2	Dan Richman	public hearing comments	I-Richman2-01	ERP-1
I-Richman2	Dan Richman	public hearing comments	I-Richman2-02	ALT-2

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-Rivera	Diane M. Rivera	email	I-Rivera-01	ERP-1
I-Rivera	Diane M. Rivera	email	I-Rivera-02	LU-1
I-Rivera	Diane M. Rivera	email	I-Rivera-03	BIO-2, BIO-3, TR-3
I-Rivera	Diane M. Rivera	email	I-Rivera-04	PD-4
I-Rivera	Diane M. Rivera	email	I-Rivera-05	AE-2
I-Rivera	Diane M. Rivera	email	I-Rivera-06	LU-1
I-Rivera	Diane M. Rivera	email	I-Rivera-07	ERP-1
I-Rivera	Diane M. Rivera	email	I-Rivera-08	LU-1
I-Robinson	Rosemary Robinson	email	I-Robinson-01	PD-2
I-Rollerli	Terry Rollerli	public hearing comments	I-Rollerli-01	AE-2
I-Romano	David Romano	email	I-Romano-01	TR-3
I-Romano	David Romano	email	I-Romano-02	ERP-3
I-Romano	David Romano	email	I-Romano-03	TR-2
I-Romano	David Romano	email	I-Romano-04	TR-3
I-Romano	David Romano	email	I-Romano-05	LU-1
I-Romano	David Romano	email	I-Romano-06	TR-2
I-Romano	David Romano	email	I-Romano-07	PP-4
I-Romano	David Romano	email	I-Romano-08	ERP-1
I-Romano	David Romano	email	I-Romano-09	ALT-4
I-Romano2	David Romano	public hearing comments	I-Romano2-01	TR-3
I-Romano2	David Romano	public hearing comments	I-Romano2-02	TR-2
I-Romano2	David Romano	public hearing comments	I-Romano2-03	TR-3
I-Romano2	David Romano	public hearing comments	I-Romano2-04	ERP-1
I-Romano2	David Romano	public hearing comments	I-Romano2-05	LU-1
I-Roskoski	Mark Roskoski	public hearing comments	I-Roskoski-01	PD-2
I-Rubio	John Rubio	public hearing comments	I-Rubio-01	PD-2
I-Rupright	Pam Rupright	public hearing comments	I-Rupright-01	PD-2
I-CRussell	Carrie Russell	public hearing comments	I-CRussell-01	ALT-2
I-MRussell	Mark Russell	email	I-MRussell-01	LU-1
I-MRussell	Mark Russell	email	I-MRussell-02	TR-3

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-MRussell	Mark Russell	email	I-MRussell-03	PD-4
I-MRussell	Mark Russell	email	I-MRussell-04	AE-2
I-MRussell	Mark Russell	email	I-MRussell-05	BIO-3
I-Sargent	John Sargent	public hearing comments	I-Sargent-01	BIO-3
I-Sargent	John Sargent	public hearing comments	I-Sargent-02	LU-1
I-Sargent	John Sargent	public hearing comments	I-Sargent-03	BIO-3
I-Sargent	John Sargent	public hearing comments	I-Sargent-04	BIO-1
I-Schmidt	Colin Schmidt	public hearing comments	I-Schmidt-01	PD-3
I-Schoggen	Leida Schoggen	letter	I-Schoggen-01	GC-2
I-Schoggen	Leida Schoggen	letter	I-Schoggen-02	BIO-3, RE-1
I-Schoggen	Leida Schoggen	letter	I-Schoggen-03	ERP-3
I-Schoggen	Leida Schoggen	letter	I-Schoggen-04	HYD-2
I-Schoggen	Leida Schoggen	letter	I-Schoggen-05	ALT-2
I-Schoggen	Leida Schoggen	letter	I-Schoggen-06	AE-2
I-Schultz	Cheryl Schultz	letter	I-Schultz-01	TR-3
I-Schultz	Cheryl Schultz	letter	I-Schultz-02	HYD-2, HAZ-2
I-Schultz	Cheryl Schultz	letter	I-Schultz-03	HYD-2
I-Schultz	Cheryl Schultz	letter	I-Schultz-04	HAZ-4
I-Schultz	Cheryl Schultz	letter	I-Schultz-05	HAZ-4
I-Schultz	Cheryl Schultz	letter	I-Schultz-06	HAZ-4
I-Schultz	Cheryl Schultz	letter	I-Schultz-07	HAZ-2
I-Schultz	Cheryl Schultz	letter	I-Schultz-08	PP-4
I-Schultz	Cheryl Schultz	letter	I-Schultz-09	HAZ-1
I-Schultz	Cheryl Schultz	letter	I-Schultz-10	PP-3
I-Schultz	Cheryl Schultz	letter	I-Schultz-11	PD-4
I-Schultz	Cheryl Schultz	letter	I-Schultz-12	TR-3
I-Schultz	Cheryl Schultz	letter	I-Schultz-13	PP-2, TR-3
I-Schultz	Cheryl Schultz	letter	I-Schultz-14	BIO-3
I-Schultz	Cheryl Schultz	letter	I-Schultz-15	PP-2, BIO-1
I-Schultz	Cheryl Schultz	letter	I-Schultz-16	PP-2, BIO-3
I-Schultz	Cheryl Schultz	letter	I-Schultz-17	BIO-4
I-Schultz	Cheryl Schultz	letter	I-Schultz-18	ALT-3

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-Schultz	Cheryl Schultz	letter	I-Schultz-19	ALT-3
I-Schultz	Cheryl Schultz	letter	I-Schultz-20	CR-3
I-Schultz2	Cheryl Schultz	public hearing comments	I-Schultz2-01	HAZ-1
I-Schultz2	Cheryl Schultz	public hearing comments	I-Schultz2-02	HAZ-2
I-Schultz2	Cheryl Schultz	public hearing comments	I-Schultz2-03	TR-3
I-Schultz2	Cheryl Schultz	public hearing comments	I-Schultz2-04	ALT-3
I-Schwartz	Richard Schwartz	email	I-Schwartz-01	PP-2
I-Schwartz	Richard Schwartz	email	I-Schwartz-02	BIO-3
I-Schwartz	Richard Schwartz	email	I-Schwartz-03	CR-2, HYD-3
I-Scott	Diana Scott	email	I-Scott-01	ALT-4
I-Sherman	Gail Sherman	email	I-Sherman-01	HAZ-4
I-Sherman	Gail Sherman	email	I-Sherman-02	ERP-1
I-Shimek	Mary Lynn Shimek	letter	I-Shimek-01	ALT-4
I-Singer	Mike Singer	public hearing comments	I-Singer-01	PD-2
I-Solow1	Andrew Solow	letter	I-Solow-01	PD-2
I-Solow2	Andrew Solow	email	I-Solow2-01	PP-2
I-Solow2	Andrew Solow	email	I-Solow2-02	ALT-5
I-Solow2	Andrew Solow	email	I-Solow2-03	PP-2
I-Solow2	Andrew Solow	email	I-Solow2-04	PD-3
I-Solow2	Andrew Solow	email	I-Solow2-05	PD-4
I-Solow2	Andrew Solow	email	I-Solow2-06	PD-4, AE-2, GC-2
I-Solow3	Andrew Solow	public hearing comments	I-Solow3-01	PD-2
I-Soulard	Chris Soulard	email	I-Soulard-01	AE-3
I-Soulard	Chris Soulard	email	I-Soulard-02	ALT-5
I-Splittgerber	Buzz Splittgerber	email	I-Splittgerber-01	ALT-1
I-Spoelstra	Henk Spoelstra	letter	I-I-Spoelstra-01	AE-2
I-Spoelstra	Henk Spoelstra	letter	I-Spoelstra-02	AE-2
I-Spoelstra	Henk Spoelstra	letter	I-Spoelstra-03	AE-2
I-Spoelstra	Henk Spoelstra	letter	I-Spoelstra-04	AE-2
I-Spoelstra	Henk Spoelstra	letter	I-Spoelstra-05	AE-2
I-Spoelstra	Henk Spoelstra	letter	I-Spoelstra-06	AE-2
I-Spoelstra	Henk Spoelstra	letter	I-Spoelstra-07	AE-2

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-Spoelstra	Henk Spoelstra	letter	I-Spoelstra-08	PD-4
I-Spoelstra	Henk Spoelstra	letter	I-Spoelstra-09	AE-2
I-Spoelstra	Henk Spoelstra	letter	I-Spoelstra-10	AE-2
I-Spoelstra	Henk Spoelstra	letter	I-Spoelstra-11	AE-2
I-Spoelstra	Henk Spoelstra	letter	I-Spoelstra-12	AE-2
I-Staben	Jeff Staben	letter	I-Staben-01	GC-2, PD-4
I-Staben	Jeff Staben	letter	I-Staben-02	PD-4
I-Staben	Jeff Staben	letter	I-Staben-03	GC-2
I-Starr	Sheila Starr	email	I-Starr-01	GC-1
I-Stein	Lyn Stein	email	I-Stein-01	ALT-2
I-Stein	Lyn Stein	email	I-Stein-02	BIO-2, BIO-3
I-Stein	Lyn Stein	email	I-Stein-03	HAZ-4
I-Stein	Lyn Stein	email	I-Stein-04	ALT-2
I-Stern	Kathleen Stern	email	I-Stern-01	ALT-1
I-Stern	Kathleen Stern	email	I-Stern-02	LU-1
I-Stern	Kathleen Stern	email	I-Stern-03	ALT-4
I-Stern2	Kathleen Stern	public hearing comments	I-Stern2-01	CR-4
I-Stern2	Kathleen Stern	public hearing comments	I-Stern2-02	LU-1, AE-2
I-Stern2	Kathleen Stern	public hearing comments	I-Stern2-03	ALT-2
I-Stern2	Kathleen Stern	public hearing comments	I-Stern2-04	PP-2
I-Streicher	Joel Streicker	email	I-Streicher-01	PD-2
I-Thomashefski	Johanna Thomashefski	public hearing comments	I-Thomashefski-01	HAZ-4
I-Thomashefski	Johanna Thomashefski	public hearing comments	I-Thomashefski-02	PD-2
I-DThompson	David Thompson	email	I-DThompson-01	PD-2
I-GThompson	Gene Thompson	email	I-GThompson-01	HAZ-5
I-GThompson	Gene Thompson	email	I-GThompson-02	HAZ-4, HAZ-5
I-GThompson2	Gene Thompson	public hearing comments	I-GThompson2-01	HAZ-4, HAZ-5
I-Triska	Frank Triska	public hearing comments	I-Triska-01	HAZ-1
I-Triska	Frank Triska	public hearing comments	I-Triska-02	GC-2

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-Van Riel	Walter Van Riel	public hearing comments	I-Van Riel-01	HAZ-1
I-Van Riel	Walter Van Riel	public hearing comments	I-Van Riel-02	PD-4
I-Warriner	Joyce Warriner	email	I-Warriner-01	PP-2, LU-1, AE-1
I-Warriner	Joyce Warriner	email	I-Warriner-02	RE-1, AE-1, LU-1, BIO-3
I-Warriner	Joyce Warriner	email	I-Warriner-03	AE-3
I-Warriner	Joyce Warriner	email	I-Warriner-04	BIO-2, BIO-3
I-Warriner	Joyce Warriner	email	I-Warriner-05	BIO-3
I-Warriner	Joyce Warriner	email	I-Warriner-06	ALT-4
I-Watkins	Richardson Watkins	letter	I-Watkins-01	PD-2
I-Watts	Kelley Watts	public hearing comments	I-Watts-01	HAZ-4
I-Weeden	Noreen Weeden	email	I-Weeden-01	BIO-3
I-Weeden	Noreen Weeden	email	I-Weeden-02	BIO-4
I-Weeden	Noreen Weeden	email	I-Weeden-03	AE-2
I-Weeden	Noreen Weeden	email	I-Weeden-04	BIO-4
I-Weeden	Noreen Weeden	email	I-Weeden-05	BIO-3
I-Weeden	Noreen Weeden	email	I-Weeden-06	ERP-1
I-Weeden	Noreen Weeden	email	I-Weeden-07	HAZ-2
I-Weeden	Noreen Weeden	email	I-Weeden-08	ALT-2
I-Weeden	Noreen Weeden	email	I-Weeden-09	GC-2
I-Welborn	Tes Welborn	public hearing comments	I-Welborn-01	ALT-4
I-Welborn	Tes Welborn	public hearing comments	I-Welborn-02	HAZ-5
I-Welborn	Tes Welborn	public hearing comments	I-Welborn-03	ALT-1
I-Welborn	Tes Welborn	public hearing comments	I-Welborn-04	PD-2
I-Wilkinson	John Wilkinson	public hearing comments	I-Wilkinson-01	HAZ-1
I-Wood	Joan Wood	public hearing comments	I-Wood-01	BIO-2
I-Wooding	George Wooding	public hearing comments	I-Wooding-01	ALT-4
I-Wooding	George Wooding	public hearing comments	I-Wooding-02	ESI-2
I-Wooding	George Wooding	public hearing comments	I-Wooding-03	ALT-2

TABLE COM-1 (Continued)
COMMENTS CODE, COMMENT NUMBER, AND COMMENT TOPIC ASSIGNMENTS

Comment Code	Organization or Group Name	Comment Type (Public hearing comments, letter, email)	Comment #	Topic Code(s)
<i>Individuals (cont.)</i>				
I-Woodruff-Long	Lorraine Woodruff-Long	email	I-Woodruff-Long-01	CR-1
I-Woodruff-Long	Lorraine Woodruff-Long	email	I-Woodruff-Long-02	PD-2
I-Woodruff-Long2	Lorraine Woodruff-Long	public hearing comments	I-Woodruff-Long2-01	PD-3
I-Woodruff-Long2	Lorraine Woodruff-Long	public hearing comments	I-Woodruff-Long2-02	LU-1
I-Woodruff-Long2	Lorraine Woodruff-Long	public hearing comments	I-Woodruff-Long2-03	PD-3
I-Woodruff-Long2	Lorraine Woodruff-Long	public hearing comments	I-Woodruff-Long2-04	LU-1
I-Wuerfel	Nancy Wuerfel	letter	I-Wuerfel-01	BIO-2, LU-1, ERP-3
I-Wuerfel	Nancy Wuerfel	letter	I-Wuerfel-02	BIO-2, BIO-3, BIO-4, BIO-1
I-Wuerfel	Nancy Wuerfel	letter	I-Wuerfel-03	BIO-1, ESI-2, BIO-2
I-Wuerfel	Nancy Wuerfel	letter	I-Wuerfel-04	BIO-2
I-Wuerfel	Nancy Wuerfel	letter	I-Wuerfel-05	ALT-5
I-Wuerfel	Nancy Wuerfel	letter	I-Wuerfel-06	ERP-1
I-Wuerfel2	Nancy Wuerfel	letter	I-Wuerfel2-01	LU-1
I-Wuerffel3	Nancy Wuerffel	public hearing comments	I-Wuerffel3-01	LU-1
I-Zwolinski	John Zwolinski	email	I-Zwolinski-01	PD-2

SOURCE: ESA, 2012

Agencies



Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit

A-CSCH



Ken Alex
Director

December 12, 2011

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

Subject: Beach Chalet Athletic Fields Renovation
SCH#: 2011022005

Dear Don Lewis:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on December 9, 2011, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

01

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

**Document Details Report
State Clearinghouse Data Base**

A-CSCH

SCH# 2011022005
Project Title Beach Chalet Athletic Fields Renovation
Lead Agency San Francisco, City and County of

Type EIR Draft EIR

Description The project sponsor, the San Francisco Recreation and Parks Department, is proposing to renovate the Beach Chalet Athletic Fields facility, an approximately 9.4 acre public sports field facility located at 1500 John F. Kennedy Drive, along the western edge of Golden Gate Park. The Athletic Fields currently include four grass turf athletic fields surrounded by an 8 foot tall metal chain link fence, an approximately 25,320 s.f., 50-space asphalt parking lot (including one disabled-accessible space), a restroom building, and a cargo container being used as a maintenance shed. The project would include replacing the existing grass turf fields with synthetic turf, installing field lighting, renovating the existing restroom building, installing player benches and seating, and various other modifications intended to improve the overall conditions of the facility and increase the amount of play time available on the athletic fields.

Lead Agency Contact

Name Don Lewis
Agency City and County of San Francisco
Phone (415) 575-9095 **Fax**
email don.lewis@sfgov.org
Address 1650 Mission Street, Suite 400
City San Francisco **State** CA **Zip** 94103-2479

Project Location

County San Francisco
City San Francisco
Region
Lat / Long 37° 46' 02" N / 122° 30' 31" W
Cross Streets 1500 John F. Kennedy Drive
Parcel No. Block 1700/Lot 001
Township

	Range	Section	Base
--	--------------	----------------	-------------

Proximity to:

Highways Hwy 1
Airports No
Railways No
Waterways Pacific Ocean
Schools SF Unified District
Land Use Public Use District, Open Space Height and Bulk District, Coastal Special Use District

Project Issues Aesthetic/Visual; Archaeologic-Historic; Biological Resources; Recreation/Parks; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; California Coastal Commission; Department of Fish and Game, Region 3; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Caltrans, District 4; Regional Water Quality Control Board, Region 2; Department of Toxic Substances Control; Native American Heritage Commission

Date Received 10/26/2011 **Start of Review** 10/26/2011 **End of Review** 12/09/2011



United States Department of the Interior

NATIONAL PARK SERVICE
Golden Gate National Recreation Area
Fort Mason, San Francisco, California 94123

RECEIVED

FEB 07 2012

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

IN REPLY REFER TO:

L76 (GOGA-PLAN)

FEB 1 2012

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

Re: Comments on the Draft Environmental Impact Report for the Beach Chalet Athletic Fields Renovation Project, San Francisco Planning Department File No. 2010.0016E

Dear Mr. Wycko:

Golden Gate National Recreation Area (GGNRA) has reviewed the Draft Environmental Impact Report (DEIR) for the Beach Chalet Athletic Fields Renovation Project. We have an interest in this project because the athletic fields are approximately 450 feet from parklands which are owned and managed by GGNRA. Our specific comments on the DEIR are enclosed.

We encourage the Environmental Impact Report (EIR) to treat Dark Night Skies as a unique resource¹ in the environmental setting of the project. The EIR should describe the Dark Night Sky baseline condition at Ocean Beach and, as part of the environmental setting, describe Ocean Beach and adjacent coastal areas (Lands End, Sutro Heights Park, and Lincoln Park) of San Francisco as having much lower outdoor lighting intensity than the interior and urban center of the city. For this coastal area, it is important that the environmental setting describe Lands End as the core of the city's dark sky zone and its use as a gathering area by local astronomers for night sky observing. Sufficient darkness in these sections of the sky is very rare elsewhere in the heavily light-polluted inner bay area. This visitor use is promoted and is a management emphasis under our National Park Service (NPS) Management Policy on Dark Skies².

This policy emphasizes that improper outdoor lighting can impede the view and visitor enjoyment, as well as disrupt natural resource processes. The EIR should address the level of light intrusion onto Ocean Beach that will occur as a result of the project and, based on the level of light intrusion, include an analysis of how this will affect visitor views of the dark night sky and nocturnal behavior and biology of Ocean Beach shorebirds based on published literature.

The coastal areas managed by NPS surrounding San Francisco are protected from light intrusion because they are managed by the NPS to achieve our Dark Night Sky management policies. NPS Management Policies direct us to work cooperatively with neighbors and local government agencies to

¹ CEQA Guidelines sec. 15125

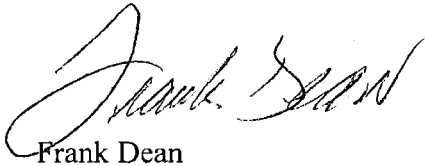
² NPS Management Policies 2006. Section 4.10

prevent or minimize the intrusion of artificial light into the night scene of the ecosystems of parks. Through the EIR, NPS hopes to gain an understanding of the light intrusion that will affect Ocean Beach and work with San Francisco Recreation and Parks Department (SFRPD) to minimize this intrusion.

↑
01
↓
cont.

We understand the proposed project's objectives and SFRPD's desire to upgrade the Beach Chalet fields. We encourage SFRPD to actively collaborate with our staff on resolving the impacts this project will have on NPS land and resources. If you have questions or require further clarification regarding our comments, please contact Nancy Hornor, Planning Division Chief, at (415) 561-4937.

Sincerely,



Frank Dean
General Superintendent

Enclosure (1): NPS Comments on Beach Chalet Athletic Fields Renovation DEIR

NPS Comments on Beach Chalet Athletic Fields Renovation DEIR

General Comments

- Dark night skies are an important attribute and resource at Ocean Beach and throughout GGNRA. Dark night skies should be identified as a unique resource (CEQA Guidelines sec. 15125) in the EIR. 01
cont.
- Page III-10: Revise "Golden Gate National Recreation Area Policies 2006" to read "National Park Service Management Policies (2006)." 02
- Page IVA-3: 1st sentence. According to Figure IV.A-1, it appears the Great Highway is approximately 250' away from the project site. 03
- Page IV.F-4: The beach and nearshore ocean ecosystems should be included in the affected habitat types. 04
- NPS suggests including the impacts of additional lighting on Greenhouse Gas Emissions 05

Lighting

- The DEIR acknowledges NPS lightscape/night skies policy, but does not quantify the light intrusion that would occur along Ocean Beach directly adjacent to the project. The DEIR's consideration and analysis of lighting impacts is focused primarily on Golden Gate Park and lands east of the Great Highway. Although the EIR states, "... the project would noticeably illuminate the project site as compared to existing conditions, light spillover into the adjacent areas, including Ocean Beach, would not be substantial." there is no quantifiable information or analysis in the EIR that supports this statement. 06
- NPS recommends the City provide lighting with the least impact that meets its project objectives. Illuminating Engineers Society's (IES) RP-6 standards, suggest that the Beach Chalet athletic fields only warrant Class IV lighting for general use, with Class III lighting only used for tournament events. Please provide the rationale to explain why the preferred lighting design is brighter than IES standards, and why the Class IV lighting cannot be used for general use. 07
- IV.B-33: This seems to be a typo intended to be "134,000 lumens per light," (not 134 lumens). 08
- Page IVB-10: The site is clearly visible from Sutro Heights Park and the West Fort Miley area of Lands End, and would be particularly visible with the proposed lighting. It is important to mention the potential impact to the visitors looking in this direction from Land's End, considered to be the center of the San Francisco's dark sky zone. Similarly, the nighttime view from the paved Ocean Beach walkway or promenade could be affected by light spilling over from the Proposed Project because, as stated in the DEIR, the light standards would be visible from the Ocean Beach promenade adjacent to the project area. Please append Table IV.B-1 to include a line item for Ocean Beach views from along the promenade. 09

- Impact AE-3: The DEIR only provides two evening view simulations, none of which includes Ocean Beach. We encourage the DEIR to provide an evening visual simulation from Ocean Beach promenade; at a location directly perpendicular from the midpoint of the Beach Chalet Fields (approximately 1,000 ft. north of Viewpoint C). From this viewpoint the EIR should quantify the amount of light spillover that will occur, and then based on these illumination levels and glare from the proposed project, analyze and discuss the effects of this light spillover from a visitor use and biological perspective (primarily shorebird nocturnal behavior discussed below). Without this quantification and analysis, we are unsure the conclusion statement (page IV.B-37), “Based on the discussion above, the development of the proposed project would not create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area or that would substantially affect other people or properties.” is supportable.

10

Biological Resources

- The negative effect of fugitive light on the Western Snowy Plover, a federally threatened species, and shorebirds at Ocean Beach may be of concern if the project increases light intrusion into their foraging habitat. Although Ocean Beach is one of the most important wintering and migratory shorebird areas along the outer coast of Central California, the DEIR focuses primarily on terrestrial habitat immediately adjacent to the athletic fields. As part of the affected environment, we feel the EIR should provide a more in-depth description of Ocean Beach’s importance as shorebird habitat.
- Please address how the Proposed Project is consistent with the Western Snowy Plover Recovery Plan (2007), which includes the following discussion on the effect of lighting on the plover:
 - a) “When urban areas interface with natural habitat areas, the value of breeding and wintering habitat to native species may be diminished by increased levels of illumination at night (e.g., building and parking lot lights) (Kelly and Rotenberry 1996/1997).”
 - b) “When beach development cannot be avoided, the following protections should be implemented: (4) lights for parking areas and other facilities should not shine on western snowy plover habitat, (5) sources of noise that would disturb western snowy plovers should be avoided, and (6) the establishment of predator perches and nesting sites should be avoided when designing facilities.”
- Page IV.F-28-29: Shorebirds and seabirds, which migrate and forage in the vicinity of Ocean Beach, are known to be sensitive to artificial light, which can affect their behavior. Birds resting or foraging on the beach could be affected by the lights at the athletic fields. Please address and provide impact analysis of the Proposed Project for shorebirds.

11

12

13



SAN FRANCISCO PLANNING DEPARTMENT

December 1, 2011

Mr. Bill Wycko
 Environmental Review Officer
 San Francisco Planning Department
 1650 Mission Street, 4th Floor
 San Francisco, CA 94103

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

Reception:
415.558.6378

Fax:
415.558.6409

Planning
 Information:
415.558.6377

Dear Mr. Wycko,

On November 16, 2011, the Historic Preservation Commission (HPC) held a public hearing and took public comment on the Draft Environmental Impact Report (DEIR) for the proposed Beach Chalet Athletic Fields Renovation Project. After discussion, the HPC arrived at the comments below:

- The HPC believes the proposed project is inconsistent with the Golden Gate Park Master Plan and conflicts with the City's General Plan policies. | 01
- The HPC agrees with the finding that the proposed project will cause a significant impact to historic resources and spatial organization of the western end of Golden Gate Park. | 02
- The HPC disagrees with the finding in the DEIR and believes there will be a big change to the aesthetics of the park. The HPC believes that the proposed project will adversely affect daytime and nighttime views of the area. | 03
- One Commissioner believes bringing night time lighting is the biggest impact of the proposed project and is more problematic and impactful than replacing the existing natural fields with artificial turf. | 04
- The HPC believes the DEIR did not adequately address safety of visitors not traveling by car and that the proposed project is "elitist" given this part of the park is not accessible by public transportation, thus does not serve the needs of all the people in the City. | 05
- The HPC believes the mitigation measures should clearly state that the park should be designed to be as naturalistic as possible and to match the semi-wild feeling that currently exists in this part of the park. | 06
- The HPC does not believe the circulation path is adequately discussed in M-CP-1 for the plaza and playground. | 07
- The HPC believes the changes made since the previous proposal is in the right direction but needs more information about the design of the area between the soccer fields and parking lot as well as the planting material. | 08
- The HPC believes the best preservation alternative is a combination of parts of preservation alternative no. 2, 3, and 4 which is to improve the soccer fields at Beach | 09
- | 10

Chalet as well as to seek an off-site alternative. The proposed off site alternative holds real potential when considered in a larger context of fields in this part of the city

- Believe that greater investigation could/should have been made in drafting the DEIR to improve use, maintenance and safety of grass fields—better drainage options, turf type and maintenance methods.
- The HPC prefers to maintain the natural fields and believes switching to artificial turf is a troubling precedent.

↑
10
cont.

The HPC appreciates the opportunity to participate in review of this environmental document. We believe there are reasonable compromises to successfully achieve the goals of recreation and the preservation of Golden Gate Park's historic character.

Sincerely,



Charles Edwin Chase, President
Historic Preservation Commission



San Francisco
Water Power Sewer

Services of the San Francisco Public Utilities Commission

I N T E R O F F I C E M E M O R A N D U M

EDWIN M. LEE
MAYOR

VICE PRESIDENT
ANSON MORAN
PRESIDENT
COMMISSIONERS


ART TORRES
VICE PRESIDENT
COMMISSIONERS

ANN MOLLER CAEN
COMMISSIONER

FRANCESCA VIETOR
COMMISSIONER

VINCE COURTNEY
COMMISSIONER
COMMISSIONERS

To: Bill Wycko, Environmental Review Officer
Attn: Don Lewis, Environmental Coordinator
Environmental Review Division
San Francisco Planning Department

From: Irina P. Torrey, AICP, Manager 
Bureau of Environmental Management

Date: December 9, 2011

Subject: Draft Environmental Impact Report
Beach Chalet Athletic Fields Renovation Project
Planning Department File Number 2010.0016E
San Francisco Planning Department Case Number 2007.1170R

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report for the Beach Chalet Athletic Fields Renovation Project. The San Francisco Public Utilities Commission offers the following comments:

General Comment:

The SFPUC recommends that the following information be included in the project description section on stormwater runoff.

The SFPUC would allow the management of stormwater runoff from the artificial turf surface to be managed separately from the stormwater runoff from all other site improvements with regard to compliance to the Stormwater Design Guidelines. SFPUC will allow the artificial turf runoff to discharge to the combined sewer system until results of the proposed water quality monitoring are determined. The SFPUC will coordinate with the San Francisco Recreation & Parks Department (SFRPD) on potentially feasible options to manage the stormwater runoff from the artificial turf underdrain system onsite; if and when it is determined that artificial turf runoff can be infiltrated and managed onsite.

It is required that stormwater runoff from all proposed disturbed impervious and pervious surfaces such as the landscaping, new parking, concrete, buildings, and plaza, etc. (excluding the artificial turf area and associated underdrain system discharge) comply with the requirements of the Stormwater Design Guidelines to meet the existing peak runoff rate and total runoff volume from the proposed project site.



San Francisco Water Power Sewer

Services of the San Francisco Public Utilities Commission

I N T E R O F F I C E M E M O R A N D U M

Page II-15, Project Description, Stormwater Runoff

The overall project area (excluding the artificial turf area) must meet the requirements of the Stormwater Design Guidelines. Revise 3rd Paragraph to clearly state that: This project will trigger compliance with the Stormwater Design Guidelines (SDG) based on all new ground disturbance (excluding the artificial turf area). As per the requirements of the SDG, this project must implement a stormwater management approach to prevent stormwater runoff flow rate and volume from exceeding existing conditions. The SFPUC prefers that stormwater runoff from the new and existing impervious surfaces are directed to naturalized BMPs such as infiltration swales or bio-infiltration facilities to reduce the peak runoff rate and runoff total volume prior to discharge to the combined sewer system.

03

Page IV.G-16, San Francisco Synthetic Turf Standards

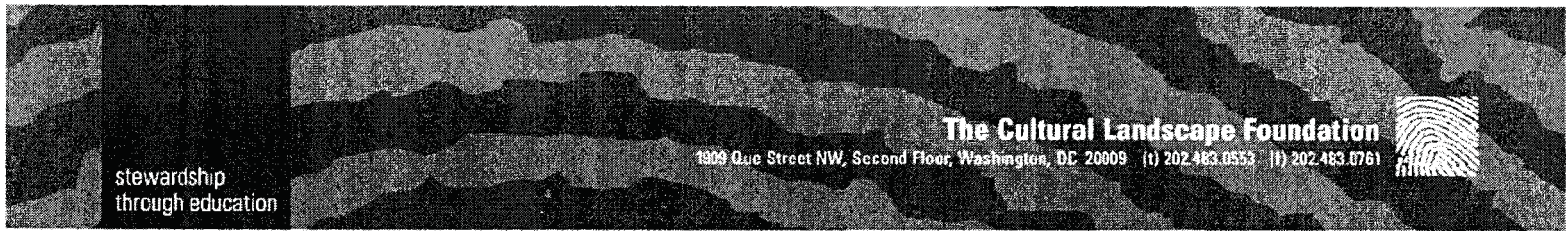
The appropriateness of the synthetic turf standard for soluble zinc in SBR infill of 250 mg/L should be discussed. When comparing the standards in Table IV.G-4, the standards for chromium and lead, and for the non-SBR infill for zinc, all are less than the drinking water standards, and less than or equal to the ESL for Groundwater. Zinc standard for SBR infill of 250 mg/L is 50 times the drinking water standard. The CCSF Recreation and Park Department 2009 reference document identifies the 250 mg/L standard for soluble zinc as the soluble threshold limit concentration (STLC) for zinc, which is a regulatory level used to classify a substance as a hazardous waste. It is not appropriate to use the STLC as a standard for drinking water protection. The same zinc standard should be used for SBR infill and non-SBR infill (i.e., 0.081 mg/L), and the EIR should be modified accordingly. If a different zinc standard is proposed, then sufficient justification should be provided demonstrating that this standard would be protective of groundwater to be used as a source of drinking water.

04

The last sentence states the Waste Extraction Test results are not necessarily representative of the zinc concentration that could dissolve into water as a result of stormwater runoff or leachate through the field. While SFPUC agrees with this statement, it does not provide sufficient justification for the elevated synthetic turf standard for soluble zinc in SBR infill (250 mg/L).

Thank you for your attention to these comments.

Organizations



www.tclf.org

December 8, 2011

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

Re: CASE NO. 2010.0016E
Beach Chalet Athletic Fields Renovation
Comment on Draft Environmental Impact Report

Dear Mr. Wycko,

The Cultural Landscape Foundation would like to take this opportunity to submit a letter regarding the Draft Environmental Impact Report (DEIR) for the Beach Chalet Athletic Fields project.

Golden Gate Park—the first large urban park built West of the Mississippi River—is an important historic designed landscape; listed on the National Register of Historic Places under Criterion C (Design) at the national level of significance in the area of landscape architecture and under Criterion A (Event) at the regional level of significance in the area of recreation and social history.

The DEIR states:

Impact CP-1: The proposed project would cause a substantial adverse change in the significance of a historic resource as defined in CEQA Guidelines Section 15064.5, including those resources listed in Article 10 or Article 11 of the San Francisco Planning Code. (Significant and Unavoidable) (page IV.C-20)

The Beach Chalet Athletic Fields Renovation Project would materially impair in an adverse manner many of the character defining features of the Beach Chalet Athletic Fields, a contributor to the Golden Gate Park National Historic District. (page IV.C-27)

01

We agree with and strongly support the above statements.

We also encourage the City of San Francisco and the Department of Recreation and Parks to select only alternatives that are consistent with the National Park Service's *Secretary of the Interior Standards for the Treatment of Historic Properties* (Secretary's Standards), *Preservation Brief 36: Protecting Cultural Landscapes* (NPS, 1994), and *The Guidelines for the Treatment of Cultural Landscapes* (NPS, 1996), the latter two of which were authored by myself. Specifically:

02

1. The existing historic design of the park encourages passive, informal uses in this area, as suggested by the naturalistic edges and open space. Alternatives that change the character of this section of the park significantly by establishing it as a heavy use, structured sports area would not be consistent with the historic design.

03



2. The removal of over 28,000 square feet from the existing planted area impacts the historic tree and shrub edge, significantly altering the historic naturalistic setting.

04

3. In addition to significant alterations to existing vegetation, the historic grading will also be significantly altered by the proposed project.

05

4. The proposed structures, including the entry plaza, light standards, fencing and maintenance shed, are out of scale with the existing surroundings, including the historic vegetation and would significantly compromise historic visual and spatial relationships.

06

5. The proposed new rectilinear pathways do not reflect the Picturesque character of the historic curvilinear roads and pathways.

07

The project, as proposed, will result in a substantial adverse impact and potentially affect the significance of the Beach Chalet Athletic Fields. We ask that you seriously analyze alternatives that would not negatively affect the integrity of Golden Gate Park.

08

Sincerely,

Charles A. Birnbaum, FASLA, FAAR
Founder + President, The Cultural Landscape Foundation

Cc: Don Lewis, Major Environmental Analysis, San Francisco Planning Department



December 8, 2011

Submitted Electronically

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

5 3RD STREET, SUITE 424
SAN FRANCISCO, CALIFORNIA
94103-3205

415.495.0349 PHONE
415.495.0265 FAX

CPF@CALIFORNIAPRESERVATION.ORG
WWW.CALIFORNIAPRESERVATION.ORG

RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR CASE NO 2010.0016E: BEACH CHALET ATHLETIC FIELDS RENOVATION

BOARD OF TRUSTEES

Dear Mr. Wycko,

PRESIDENT
Christine Fedukowski, *Pasadena*
VICE-PRESIDENT, PROGRAMS
Charles Chase, *AIA, San Francisco*
VICE-PRESIDENT, DEVELOPMENT
Thomas Neary, *Santa Monica*
TREASURER
David Wilkinson, *Woodland*
SECRETARY
Sarah Sykes, *San Carlos*

On behalf of California Preservation Foundation (CPF), thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Beach Chalet Athletic Fields Renovation.

Ray Adamyk, *Pomona*
Robert Chaffel, *AIA, Sherman Oaks*
Robert Imber, *Palm Springs*
Diane Kane, *PhD, La Jolla*
Lydia Kremer, *Palm Springs*
David Marshall, *AIA, San Diego*
Gil Mathew, *Grass Valley*
Kelly Sutherland-McLeod, *AIA, Long Beach*
Julianne Polanco, *San Francisco*
Richard Sucre, *San Francisco*

CPF is the only statewide nonprofit organization dedicated to the preservation of California's diverse cultural and architectural heritage. Established in 1977, CPF works with its extensive network to provide statewide leadership, advocacy and education to ensure the protection of California's diverse cultural heritage and historic places. On March 29, 2010 and April 16, 2010, CPF submitted letters on the proposed project and for the Notice of Preparation on March 4, 2011.

The Beach Chalet Soccer fields are located at the western terminus of Golden Gate Park, which is listed in the National Register of Historic Places. Intended to remain a naturalist meadows and woodlands, when the current athletic fields were introduced, there was little impact. The improvements being proposed today are inconsistent with the Golden Gate Master Plan and would have a significant impact on the environment.

01

EXECUTIVE DIRECTOR
Cindy L. Heitzman

The original Golden Gate Park Master Plan, adopted in 1998 after exhaustive environmental review, recommends that the original design of the park be followed in all decisions about new projects. It clearly called out proposed improvements to the western end, specifically to improve the landscaping, continue reforestation of the western windbreak, add a soccer field near the waste facility, and pursue restoration and rehabilitation for the windmills, Millwright's House and the Beach Chalet. It did not include the complete renovation of the soccer fields or introduction of artificial elements into the landscape. The DEIR states that the project is consistent with the Golden Gate Master Plan, stating: "because the project would be implemented **entirely within the boundaries of the existing complex**, the proposed turf would be consistent with the character of the use as an athletic field complex, any trees or shrubs removed would be replaced at a ratio of at least 1-to-1, and the project would not diminish or encroach upon the surrounding open space." In fact, **the proposed project does expand beyond the boundaries of the existing complex by an additional 2 acres**, contradicting the aforementioned statement in the DEIR.

02

In looking at Table II-2 and Figure II-6 Proposed Site Plan, the existing grassy area used as athletic fields would be expanded by almost 20,000 square feet with permanent fields, not including the seating which encroaches into the open space; the parking lot would be expanded by almost 10,000 square feet; and around 70 new lights, sidewalks, play structures, etc. would be added to the site. One of the Policies that the DEIR failed to review is Policy A for Naturalistic Parkland. The only portion in the Golden Gate Park Land Use Map depicted as Major Recreation are the original fields themselves, the surrounding area is considered Naturalistic Parkland.

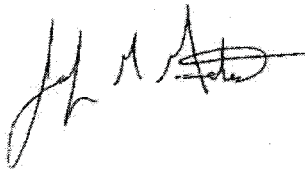
↑
02
cont.

Public agencies must "deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects." *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 40, 41; see also Public Resources Code § 21002, 21002.1. In the DEIR three additional alternatives and the No Project Alternative were analyzed. Of these alternatives, all three alternatives would decrease the impact to the cultural resource. These alternatives however only took out one aspect of the project and did not explore minimizing the overall impact to the site by reduction of use. We believe that another hybrid alternative could meet most of the project objectives. This would include renovating the existing fields with natural turf and limited to no lighting and renovating fields at West Sunset Park.

03
04

This project would cause a significant and unavoidable impact on historic resources, as stated in the DEIR. CPF requests the Golden Gate Park Master Plan be more thoroughly reviewed as additional project alternatives analyzed that maintain the historic character of Golden Gate Park while providing a safe environment for the continued use as soccer fields. Please feel free to contact me at (415) 495-0349 or jgates@californiapreservation.org if you have any questions or concerns.

Sincerely,



Jennifer M. Gates, AICP
Field Services Director

cc: Milford Wayne Donaldson, FAIA, State Historic Preservation Officer
San Francisco Ocean Edge
Golden Gate Park Preservation Alliance
San Francisco Architectural Heritage
National Trust for Historic Preservation

Coalition for San Francisco



Neighborhoods

www.csfn.net • PO Box 320098 • San Francisco CA 94132-0098 • 415.262.0440 • Est 1972

President

Judith Berkowitz 415.824.0617

1st Vice President

Penelope Clark 776.3876

2nd Vice President/

Recording Secretary

Angelique Mahan 334.7131

Corresponding Secretary

Dick Millet 861.0345

Treasurer

Jim Lew 771.5250

Members-at-Large

Sue Cauthen

Rose Hillson

Lorraine Lucas

Mr. Bill Wycho

December 12, 2011

Environmental Review Officer
San Francisco Planning Department
1650 Mission St., Room 400
San Francisco, Ca 94103

Subject: Beach Chalet Athletic Fields Renovation
DEIR Planning Department Case # 2010.0016E
State Clearinghouse # 2011022005

Dear Mr. Wycho,

The Coalition for San Francisco Neighborhoods (CSFN) believes the DEIR for the Beach Chalet project is incomplete, inadequate, and inaccurate. The review period did not allow neighborhood groups adequate time to understand and review the DEIR. This is a real problem that needs to be addressed not only for this DEIR but for all DEIR. If the public outreach and input is important, the comment period needs to be increased to a minimum of 60 days. San Francisco is not bound to follow the State requirements of 30 days for the comment period. If the State wants to limit the comment period and stifle the public, San Francisco should lead the way and show the State that the public input is important and critical to a fair and open process.

After a quick look, it seems obvious that the project values increased hours of soccer play rather than protecting the parkland. In a chapter on cultural resources, the DEIR states there will be "significant and unavoidable impacts." There are problems in calling Myoporum tress "shrubs". The new pathways do not meet ADA standards. With so many lights being installed, what is the cumulative impacts on wildlife? The DEIR does not consider the cumulative impact of the water treatment plant as required by State CEQA laws that foreseeable impacts be considered. Many of the negative impacts could be reduced by selecting a more environmentally friendly option. The development on the West end of Golden Gate Park is in violation of the Golden Gate Park Master Plan.

01
02
03
04
05
06
07

- Barbary Coast Neighborhood Assn
- Buena Vista Neighborhood Assn
- Castro-Eureka Valley Neighborhood Assn
- Cathedral Hill Neighbors Assn
- Cayuga Improvement Assn
- Cole Valley Improvement Assn
- Cow Hollow Assn
- Diamond Heights Neighborhood Assn
- Dolores Heights Improvement Club
- East Mission Improvement Assn
- Ewing Terrace Neighborhood Assn
- Excelsior District Improvement Assn
- Fair Oaks Community Coalition
- Forest Knolls Neighborhood Assn
- Francisco Heights Civic Assn
- Golden Gate Heights Neighborhood Assn
- Greater West Portal Neighborhood Assn
- Haight Ashbury Improvement Assn
- Inner Sunset Park Neighbors
- Inner Sunset Action Committee
- Jordan Park Improvement Assn
- Laurel Heights Improvement Assn
- Liberty Hill Neighborhood Assn
- Lincoln Park Homeowners Assn
- Marina Civic Improvement & Property Owners Assn
- Middle Polk Neighborhood Assn
- Midtown Terrace Homeowners Assn
- Miraloma Park Improvement Club
- Mission Creek Harbor Assn
- New Mission Terrace Improvement Assn
- North Beach Neighbors
- Oceanview, Merced Heights, Ingleside - Neighbors in Action
- Outer Mission Residents Assn
- Pacific Heights Residents Assn
- Panhandle Residents Organization/ Stanyan-Fulton
- Parkmerced Action Coalition
- Parkmerced Residents Org
- Potrero Boosters Neighborhood Assn
- Richmond Community Assn
- Rincon Point Neighborhood Assn
- Russian Hill Improvement Assn
- Russian Hill Neighbors
- Sunset Heights Assn of Responsible People
- Sunset-Parkside Education & Action Committee
- Telegraph Hill Dwellers
- Twin Peaks Council & Open Space Conservancy
- Twin Peaks Improvement Assn
- University Terrace Neighborhood Assn

Other issues:

Artificial turf replacement: What happens to the field when it wears out in 8-10 years? This is important because there are approximately 30 acres of artificial turf throughout the city. This would be a rather expensive undertaking, and the city at this point does not have the budget for hardly anything. What is the guarantee that it will be replaced properly? It will be a much easier and reasonable cost-effective replacement. What will be the impact of the park land if there is no money to either replace the turf in 10 years or put back the natural grass?

08

Artificial turf safety:

This question was not fully studied in the draft. It does not fully evaluate the artificial turf and the safety. Many college and professional football and baseball fields have switched from artificial turf to natural turf because of injuries attributed to artificial turf.

09

Natural turf:

The benefits for new technology that have been used to insert turf in other areas of the country and throughout the world. This has not been fully evaluated.

From Turf resource Center: Natural Grass and Artificial Turf – Separating Myths and Facts

Natural turfgrass playing surfaces have been used successfully for many years and there is a wealth of scientific data documenting their safety. With proper management and balanced use, natural grass fields have been proven to withstand and accommodate multiple sports team usage. While natural grass surfaces may become worn from excessive use, those portions of the fields can be easily, economically and quickly replaced. With proper management, the playability of a natural grass field, with a consistent and uniform playing surface, can be maintained year after year for a fraction of the cost of an artificial turf surface over its projected life expectancy. An entire natural turf grass field could be replaced every year and have the worn parts of the field repaired, all at a significantly lower cost than installing and maintaining an artificial turf field. A well maintained natural grass field may require water, fertilizer, pest management and mowing, but at significantly lower levels than often claimed by artificial turf sales people.

10

An artificial turf field requires watering to cool the field to make it playable during warm days. What is generally omitted is the fact artificial turf fields need pesticides and disinfectants to prevent or eliminate mold, bacteria and other hazards that would otherwise be biodegraded by the natural environment of turfgrass fields. The maintenance equipment required for artificial turf fields is often underestimated. Companies produce entire lines of maintenance equipment for upkeep of artificial fields and for bringing them back to a playable condition.

While artificial turf has made improvements, artificial turf manufacturers continue attempts to simulate the exceptional playing surface that only natural grass provides. No

matter what you call it – Artificial Turf, Synthetic Turf, Plastic Grass – it is a fact that artificial surfaces lack most of the benefits provided by natural turfgrass. Many athletes, coaches, parents and spectators take for granted the significant benefits of natural grass.

Companies involved in the manufacture or marketing of artificial turf acknowledge they have a responsibility to address concerns about their products; however their products have a relatively short history from which to draw any proven results. It is disconcerting that very few people question the erroneous claims of marketing firms and consider their data to be factual. More scientific research is needed to directly address reliability, longevity and the potential negative impact of artificial turf with regards to safety, health and environmental issues.

Municipalities, schools and groups are beginning to wake-up to the potential problems and negative affects involved with artificial turf. Several have placed a moratorium on its use until more of these questions have valid, scientific answers based on proven data. Parents, athletic booster clubs, schools boards, athletic directors, coaches and local officials deserve answers to help them evaluate unsubstantiated claims.

Surveys of NFL players show that most athletes prefer a natural grass playing surface and feel it is the more desirable, premium surface. The fact that others have installed artificial turf surfaces is not an acceptable reason to ignore the research and facts. Choosing the best playing surface for our children and athletes should not be taken lightly. Anyone interested in a sustainable future should be fully informed about the benefits of natural turfgrass to our ecosystem

Alternative sites have not been fully investigated.

The Coalition for San Francisco Neighborhoods (CSFN) supports an alternative site to protect Golden Gate Park's Beach Chalet Athletic Fields as a natural turf field within naturalistic parkland, as a multi-use meadow, and as wildlife habitat while providing additional playing hours.

We believe that this can be accomplished by a combination of Alternatives #2, #3, and #4. 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 -

10
cont.

11

- 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
 - gophers 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 Golden Gate 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 Golden Gate Park Master Plan and the Secretary of the Interior Guidelines
- Benefit: preserves wildlife habitat
- Benefit: provides a quality, natural grass field for youth soccer during the day
- 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: meets 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
cont.

CSFN opposes the DEIR for the Beach Chalet project because it is inaccurate, inadequate, and incomplete.

Sincerely,



Judy Berkowitz, President
Coalition for San Francisco Neighborhoods

Coalition for San Francisco



www.csfn.net • PO Box 320098 • San Francisco CA 94132-0098 • 415.262.0440 • Est 1972

President November 9, 2011

- Judith Berkowitz 415.824.0617
- 1st Vice President
- Penelope Clark 776.3876
- 2nd Vice President/
- Recording Secretary
- Angelique Mahan 334.7131
- Corresponding Secretary
- Dick Millet 861.0345
- Treasurer
- Jim Lew 771.5250
- Members-at-Large
- Sue Cauthen
- Rose Hillson
- Lorraine Lucas

Christina Olague, President
 Planning Commission
 1650 Mission Street, Suite 400
 San Francisco, CA 94103

**Re: Request for 90-day extension of public comment period
 Beach Chalet Athletic Fields Draft Environmental Impact Report
 Planning Department Case No. 2010.0016E
 State Clearinghouse No. 2011022005**

President Olague, Commissioners,

The Coalition for San Francisco Neighborhoods respectfully requests that the Planning Commission extend the public comment period for the Beach Chalet Athletic Fields Draft Environmental Impact Report (DEIR) for 90 days.

The Beach Chalet DEIR is a very dense and technical document of over 360 pages, and our membership requests the extra time to give it the thorough examination that it requires to return informed commentary on its content.

Thank you for your consideration.

Sincerely,

Judith Berkowitz
President

cc: Commission Secretary Linda Avery, Planning Commissioners

- Barbary Coast Neighborhood Assn
- Buena Vista Neighborhood Assn
- Castro-Eureka Valley Neighborhood Assn
- Cathedral Hill Neighbors Assn
- Cayuga Improvement Assn
- Cole Valley Improvement Assn
- Cow Hollow Assn
- Diamond Heights Neighborhood Assn
- Dolores Heights Improvement Club
- East Mission Improvement Assn
- Ewing Terrace Neighborhood Assn
- Excelsior District Improvement Assn
- Fair Oaks Community Coalition
- Forest Knolls Neighborhood Assn
- Francisco Heights Civic Assn
- Golden Gate Heights Neighborhood Assn
- Greater West Portal Neighborhood Assn
- Haight Ashbury Improvement Assn
- Inner Sunset Park Neighbors
- Inner Sunset Action Committee
- Jordan Park Improvement Assn
- Laurel Heights Improvement Assn
- Liberty Hill Neighborhood Assn
- Lincoln Park Homeowners Assn
- Marina Civic Improvement & Property Owners Assn
- Middle Polk Neighborhood Assn
- Midtown Terrace Homeowners Assn
- Miraloma Park Improvement Club
- Mission Creek Harbor Assn
- New Mission Terrace Improvement Assn
- North Beach Neighbors
- Oceanview, Merced Heights, Ingleside - Neighbors in Action
- Outer Mission Merchants & Residents Assn
- Pacific Heights Residents Assn
- Panhandle Residents Organization/ Stanyan-Fulton
- Parkmerced Action Coalition
- Parkmerced Residents Org
- Potrero Boosters Neighborhood Assn
- Richmond Community Assn
- Rincon Point Neighborhood Assn
- Russian Hill Improvement Assn
- Russian Hill Neighbors
- Sunset Heights Assn of Responsible People
- Sunset-Parkside Education & Action Committee
- Telegraph Hill Dwellers
- Twin Peaks Council & Open Space Conservancy
- Twin Peaks Improvement Assn
- University Terrace Neighborhood Assn

01



Cary Jones, District 1 Asst. Commissioner
36 Dunsmuir St., San Francisco, CA 94134
415-337-6630
cjones8434@sbcglobal.net
www.cysad1.org

HPC meeting on 11-16-11
2001. 2016E
D. LEWIS

November 11, 2011

Dear Commissioners,

I submit this statement on behalf of the players, coaches, and parents in San Francisco that are affiliated with the California Youth Soccer Association. Through local non-profit organizations such as the PAL, San Francisco Vikings Youth Soccer league, and the Mission Youth Soccer League, we have been providing soccer activity in the city for over 40 years.

These youth leagues represent over 6000 boys and girls living in San Francisco who depend on the city of San Francisco for safe places to play.

The parents of these 6000 kids are all San Francisco taxpayers, and deserve to have their tax dollars spent wisely to provide safe fields for play.

The Beach Chalet Athletic facility is one of the primary facilities in San Francisco for ground sports and the proposed project offers a significant resource for public recreation. There exists no shortage of ground sports athletic field users in this city. There only exists a shortage of usable facilities.

Although these thousands of players, coaches, and parents cannot be here to testify, I'm sure they would offer their votes in favor of the Beach Chalet Athletic Fields Renovation Project by the CityFields Foundation. The draft EIR appears to be thorough and we advocate its certification. Please fix the chronic maintenance problems that have limited the use of the Beach Chalet. Eliminate forever the injuries caused by gopher holes and uneven turf. Make the Beach Chalet fields safe and create a facility we can be proud of in San Francisco.

Sincerely,

Cary Jones, District 1 CYSA Assistant Commissioner

01
02



Cary Jones, District 1 Asst. Commissioner
36 Dunsmuir St., San Francisco, CA 94134
415-337-6630
cjones8434@sbcglobal.net
www.cysad1.org

BEACH CHALET ATHLETIC FIELDS RENOVATION
Planning Department Case No.2010.0016E

Draft Environmental Impact Report

December 1, 2011

RECEIVED AT CITY HEARINGS 12-1-11
(D. LEWIS)

Dear Commissioners,

I submit this statement on behalf of the players, coaches, and parents in San Francisco that are affiliated with the California Youth Soccer Association. Through local non-profit organizations such as the PAL, San Francisco Vikings Youth Soccer league, and the Mission Youth Soccer League, we have been providing soccer activity for youth in the city for over 40 years.

Local sports groups began advocating the installation of synthetic turf fields in San Francisco starting in 1998 through the Ground Sports Advisory Committee to the San Francisco Recreation & Parks Department. The many advantages of synthetic turf were obvious at that time and recent projects by City Fields and the Recreation & Parks Department have remedied several neglected facilities around the city. Take a look at the City Fields Foundation website for striking photos before and after recent installations (<http://www.cityfieldsfoundation.org>).

The Beach Chalet Athletic Field has been a traditional facility in San Francisco for ground sports. The previous renovation of the Beach Chalet fields occurred in 1998, only after the risks of injury on the poorly maintained grass at that location were made known to Mayor Willie Brown. A fence was put up to restrict access in order to preserve the field. [01]

The youth leagues in San Francisco affiliated with CYSA represent over 6000 boys and girls who depend on the city of San Francisco for safe places to play. Organized sports for kids offer a positive alternative to juvenile crime and help prevent childhood obesity. The parents of these 6000 kids are all San Francisco taxpayers, and deserve to have their tax dollars spent wisely to provide safe fields for play.

While the draft EIR is generally quite thorough, I have a problem because it does not fully address the impact of the field surface on the users. What is the impact on a player being injured by uneven grass or a gopher hole? How does a child learn to pass the ball over grass pitted with dirt patches? These are certainly important considerations for athletic usage. [02]

Although the thousands of players, coaches, and parents cannot be here to testify, I'm sure they would offer their votes in favor of the Beach Chalet Athletic Fields Renovation Project by the CityFields Foundation. The proposal is in tune with the Recreation and Open Space component of the San Francisco General Plan to improve the western end of Golden Gate Park for public recreation. The proposal addresses the continual problems that have existed at the Beach Chalet field regarding maintenance and scheduling. [03] [04]

Please fix the chronic maintenance problems that have limited the use of the Beach Chalet. Eliminate forever the injuries caused by gopher holes and uneven turf. Make the Beach Chalet fields safe and create a facility we can all be proud of in San Francisco. There exists no shortage of ground sports athletic field users in this city. There only exists a shortage of usable facilities.

Sincerely,

Cary Jones, District 1 CYSA Assistant Commissioner



*Inspiring people to protect
Bay Area birds since 1917*

November 21, 2011

Via Facsimile and Email

Linda Avery
Secretary, Planning Commission
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103
Fax: (415) 558-6409
Email: Linda.Avery@sfgov.org

**Re: Request for 60-Day Extension of Public Comment Period for the Draft
Environmental Impact Report on Beach Chalet Soccer Field Project**

Dear Commissioners:

I am writing on behalf of the Golden Gate Audubon Society to request a 60-day extension for the public comment period on the Draft Environmental Impact Report (DEIR) for the Beach Chalet Soccer Field. Golden Gate Audubon has long worked to conserve Bay Area wildlife and open space. The proposed project represents a significant and permanent change in the character of the western end of Golden Gate Park. As such, care should be taken to ensure that all parties—not just the project proponents—have ample time to present personal and technical comments.

01

Therefore, we respectfully request that the time to be comment be extended 60-days to February 10, 2012. This will allow all stakeholders ample time to review the DEIR and prepare technical comments. The technical comments often involve the hiring of expert consults, which requires considerable effort and cost. Because many who are concerned about the impacts of this project are local residents and non-profit organizations, they are working on limited budgets and must fundraise and organize to retain the needed consultants. Then the experts must take time to review the DEIR and prepare comments. The brief period provided under the current schedule is hindering the ability of many stakeholders to provide comprehensive comments that will better inform the Planning Commission and, ultimately, improve the project.

This disparity is even greater where, as here, a well-funded group like the City Fields Foundation has relatively unlimited funds to prepare technical comments and organize to turn out comments and speakers at hearings. We also know that the Recreation and Parks Dept. has already predetermined the “preferred alternative” for the project, regardless of the

02

GOLDEN GATE AUDUBON SOCIETY
2530 San Pablo Avenue, Suite G Berkeley, California 94702
phone 510.843.2222 fax 510.843.5351 web www.goldengateaudubon.org

San Francisco Planning Commission
Request for 60-day Extension for Comments re: Beach Chalet Athletic Fields Project DEIR
November 21, 2011
Page 2 of 2

outcome of the environmental review. The neighbors and groups that are concerned about this project deserve to have adequate time to prepare professional-grade comments that will fully explore the issues involving the massive amount of artificial turf, extremely tall, bright lights, and artificial-turf fields and extremely tall, bright lights, and the large crowds that will be created by the project. The project is the ecological equivalent of a massive parking lot in the western end of a part of Golden Gate Park that has long been a refuge for wildlife and people who appreciate nature.

↑
02
cont.
|
03
|

Thank you for your consideration of our request. If you would like to discuss this further, please do not hesitate to contact me at (510) 843-6551 or mlynes@goldengateaudubon.org

Sincerely,



Michael Lynes
Conservation Director

Cc: Christina Olague, President, SF Planning Commission



*inspiring people to protect
Bay Area birds since 1917*

December 12, 2011

Via Facsimile and Email

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

Re: Comments regarding the Beach Chalet Athletic Fields Renovation Draft
Environmental Impact Report
Planning Dept. # 2010. 0016E
Clearing House # 2011022006

Dear Mr. Wycko:

I am writing on behalf of the Golden Gate Audubon Society to provide comments regarding the Beach Chalet Athletic Fields Renovation Draft Environmental Impact Report (DEIR). Golden Gate Audubon's members use and enjoy the western end of Golden Gate Park, Ocean Beach, and other areas that will suffer substantial adverse impacts due to the project. We are concerned about the incomplete and biased nature of the DEIR and hope that these comments will improve help create a better project that will meet the community's needs for both athletic facilities and for the natural retreat provided by the western end of Golden Gate Park.

Any discussion about development in Golden Gate Park, especially in the western end, but take place within the context of the Golden Gate Park Master Plan (1998). The Master Plan states:

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.**

(Golden Gate Park Master Plan, at 3-9, Policy A-2 [emphasis added])

There is no doubt that the project will compromise the integrity of the pastoral and sylvan landscape of the western end of Golden Gate Park. The project as proposed will

GOLDEN GATE AUDUBON SOCIETY
2530 San Pablo Avenue, Suite G Berkeley, California 94702
phone 510.843.2222 fax 510.843.5351 web www.goldengateaudubon.org

1. quadruple usage at the site, with an associated increase in automobile traffic
2. install up to nine acres of synthetic turf material, which will remove one of San Francisco’s largest open, grassy meadows and will require disposal of approximately 400 tons of potentially hazardous materials in less than a decade;
3. install 60-foot stadium lights in a part of the park that was previously dark at night and add to light pollution at other dark areas, including Ocean Beach and Land’s End;
4. alter wildlife populations at the site, resulting from potential changes in migratory, feeding, and breeding behaviors’ and
5. potentially discharge heavy metals and other pollutants to ground water and storm water discharged from the site.

01
cont.

As an important historical resource and as a designated Urban Bird Refuge, Golden Gate Park deserves special consideration and projects that inflict substantial environmental changes should be given heightened scrutiny. There should be special consideration given to this area and all reasonable, environmentally superior alternatives should be fully considered. The comments provided below are intended to assist the Planning Department and the project sponsors with improving the DEIR and adopting an alternative that meets their most objectives while preserving the naturalistic landscape of the park as required by the Master Plan.

02

I. GENERAL COMMENTS

A. All Substantial Impacts to Biological Resources in San Francisco Parks Should Be Considered “Significant”.

What may be “significant” in a rural or even suburban community is different than what is locally “significant” in a dense urban metropolitan area. In San Francisco, unlit, semi-natural areas are few and far between—hemmed in from each side by houses and subject to ever-increasing demands from recreational users. It is clear that in San Francisco that parks—even designated “wild” areas like the western end of Golden Gate Park—are not for wildlife, native plants, or the people that care about them. “Recreation” in these places is not the quiet enjoyment of nature but, rather, the industrial-scale

03

The DEIR’s analysis in this regard is especially weak given the context in which the new impacts would occur. There is very little habitat, especially wide-open, grassy habitat, left in San Francisco. The significance of the impacts depend on the specific setting of the project, including the severity of existing environmental harm. (*Communities for a Better Environment v. California Resources Agency* [2002] 103 Cal.App.4th 98 120 [“[T]he relevant question”... is not how the effect of the project at issue compares to the preexisting cumulative effect, but whether “any additional amount” of effect should be considered significant in the context of the existing cumulative effect. [footnote omitted] In the end, the greater the existing environmental problems are, the lower the threshold should be for treating a project’s contribution to cumulative impacts as significant. [footnote omitted]”) The DEIR makes no consideration of the existing, compromised nature of San Francisco’s environment

04

and downplays (or is uninformative) about the impacts that removing up to 9 acres of meadow-like habitat from San Francisco's western edge.

↑
04
cont.

B. The DEIR Fails to Adequately Describe the History of the CEQA Process for this Project.

The Planning Department (at the urging of the RPD and City Fields Foundation) initially tried to circumvent the EIR process by issuing a Categorical Exemption in April 2010. In the Categorical Exemption, the Planning Department claimed, among other things, that the project was consistent with all land use plans and that it would not have a significant negative impact on the historical and aesthetic resources. (See Categorical Exemption, at 6, 11)

The Planning Department and RPD only relented and agreed to produce an EIR once Golden Gate Audubon and other groups and individuals appealed the Categorical Exemption. The DEIR does not reflect this history and, as such, is misleading to decision makers about the CEQA process to date.

05

Moreover, given the extremely close relationship between RPD, the Planning Department, and the private City Fields Foundation, Golden Gate Audubon is not confident that the Planning Department exercised the kind of "independent judgment" in preparing the DEIR that is required by law. (See *Friends of La Vina v. County of Los Angeles* (1991) 232 Cal.App.3d 1446; see also *Protect the Historic Amador Waterways v. Amador Water Agency*, *supra*, 116 Cal.App.4th 1099 [requiring independent factual analysis]) Because the departments have not been forthcoming, even to Sunshine Act Requests, about documents and communications related to this matter, the public and decision makers have no way of discerning the independence of the Planning Department's judgment in this matter.

C. The DEIR Consistently Presents Conclusions without Providing Supporting Evidence or Adequate Information to Assess their Reliability.

Throughout the document, the DEIR's authors rely on assumptions and provide conclusions without providing supporting facts or other evidence. This is not allowed under CEQA.¹ The DEIR must set forth the factual basis for these conclusions rather than merely

06

¹ See, e.g., *Californians for Alternatives to Toxics v. Department of Food & Agriculture* (2005) 136 Cal.App.4th 1, 16 (lead agencies must review the site-specific impacts of pesticide applications under their jurisdiction, because "DPR's [Department of Pesticide Regulation] registration does not and cannot account for specific uses of pesticides..., such as the specific chemicals used, their amounts and frequency of use, specific sensitive areas targeted for application, and the like"); *Citizens for Non-Toxic Pest Control v. Department of Food & Agriculture* (1986) 187 Cal.App.3d 1575, 1587-1588 (state agency applying pesticides cannot rely on pesticide registration status to avoid further environmental review under CEQA); *Oro Fino Gold Mining Corporation v. County of El Dorado* (1990) 225 Cal.App.3d 872, 881-882 (rejects contention that project noise level would be insignificant simply by being consistent with general plan standards for the zone in question). See also *City of Antioch v. City Council of the City of Pittsburg* (1986) 187 Cal.App.3d 1325, 1331-1332 (EIR required

assume the conclusions it is supposed to prove.² The DEIR must be revised to provide the foundations for these conclusions.

↑
06
cont.

For example, the DEIR consistently states that the synthetic turf fields will last at least 10 years. However, the DEIR provides no references to support that conclusion. Golden Gate Audubon is informed and believed that some synthetic turf surfaces have shown visible breakdown after approximately 8 years of use. At a minimum, the DEIR must be revised to provide the foundation for this conclusion, especially given that the DEIR allows the turf manufacturer up to seven years to come up with a recycling and replacement plan.

↑
07

II. THE EXECUTIVE SUMMARY IS INCOMPLETE, INADEQUATELY DESCRIBES IMPACTS AND ALTERNATIVES, AND IS INTENDED TO BIAS THE READER IN FAVOR OF THE PROPOSED PROJECT.

Many the deficiencies in the Executive Summary exist because they reflect inadequacies elsewhere in the DEIR. We feel it is necessary to discuss the Executive Summary because we believe that many decision makers rely on the Executive Summary and do not read the entire EIR.

A. The Executive Summary Is Worded to Bias the Reader in Favor of the Proposed Project.

The Executive Summary misrepresents over over-promises some of the benefits and characteristics of the Project. By downplaying the impacts in the Executive Summary, the Planning Department will unfairly skew decision makers to approving the project as preferred by the Project proponents. For example, the DEIR states that the artificial turn is “expected” to have a minimum life of ten years, but it never in the document provides a basis for this conclusion. (DEIR, at ES-1) This incompleteness in the DEIR constitutes a fatal flaw that undermines the purpose of CEQA.

↑
08

for construction of road and sewer lines even though these were shown on city general plan); *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 712-718 (agency erred by “wrongly assum[ing] that, simply because the smokestack emissions would comply with applicable regulations from other agencies regulating air quality, the overall project would not cause significant effects to air quality.”).

² See *Santiago County Water Dist. v. County of Orange* (1981) 118 Cal.App.3d 818, 831 (“**The EIR must contain facts and analysis, not just the bare conclusions of a public agency.** An agency’s opinion concerning matters within its expertise is of obvious value, but the public and decision-makers, for whom the EIR is prepared, should also have before them the basis for that opinion so as to enable them to make an independent, reasoned judgment....What is needed is some information about how adverse the adverse impact will be.” [emphasis added])

B. The Executive Summary’s Discussion of the Off-site Alternative Is Incomplete and Misleading.

The Executive Summary mischaracterizes the Off-site Alternative by stating that it would have biological resources, hydrology and water quality, and hazards and hazardous material impacts that would be “comparable” to the proposed Project. (DEIR, at ES-3) This assessment does not appear to be consistent with information provided later in the DEIR or, frankly, with reality. The proposed project at the Beach Chalet will render a significant biological and ecological change to a part of Golden Gate Park that has long been much darker at night than it will under the preferred plan. Moreover, the hydrology of the Beach Chalet in Golden Gate Park is much different than that at West Sunset Playground, including the fact that the western end of Golden Gate Park discharges groundwater to an aquifer that the San Francisco PUC considers of important strategic value.

09

We also believe that the Executive Summary underestimates the value to recreational resources that would occur if the West Sunset Playground were selected in conjunction with upgrades at the Beach Chalet. Such an alternative would allow for increased play at both sites, perhaps meeting or exceeding the accommodation of new players anticipated by the Project at the Beach Chalet. Such a hybrid would also reduce some of the need for some project objectives, such as increasing access to the Beach Chalet fields or renovating the parking lot to the degree proposed. Sadly, the DEIR does not consider such a hybrid alternative and, instead, by “putting all its eggs in one basket”, is overly biased toward the Recreation and Parks Department’s preferred alternative.

10

C. The Executive Summary’s Discussion of the Grass Fields/Reduced Lights Alternative Is Misleading.

Once again, the DEIR’s bias for RPD’s and the City Fields Foundation’s preferred alternative of artificial turf and large light fixtures is apparent in the discussion of the Grass Fields/Reduced Lighting Alternative in the Executive Summary. (See DEIR, at ES-4-6) First, the Executive Summary states that the Grass Fields alternative would have “similar construction impacts” but it explicitly excludes impacts associated with the installation of artificial turf, which likely constitute the greatest construction-related impacts (to say nothing of the construction-related impacts associated with removing the artificial turf in 8-10 years). (*Id.*, at ES-5) We also note that the DEIR acknowledges that there would be fewer impacts from light than those of the proposed project, but it emphasizes that those impacts under the proposed project are “less than significant.”

11

Second, the Executive Summary incorrectly states that under the Grass Fields alternative hazardous materials impacts are expected to be similar to the preferred Alternative. (DEIR, at ES-5). The DEIR itself makes this assertion, but provides no concrete assurances to support it.

12

Like the full text of the DEIR, the Executive Summary also overstates the similarity between Alternative 3 and the proposed alternative. For example, the text of the Executive

13

summary understates impacts due to field construction and focuses primarily on the removal of trees and other vegetation. (DEIR, at ES-5) However, the construction of the proposed Project will also include the installation of tons of artificial turf materials and 60-foot tall stadium lights. Golden Gate Audubon does not understand how the impacts of the proposed Project, which include significant earth moving and installation of tons of artificial fill, as well as 60-foot tall lights, can be considered to be substantially similar to the replacement of naturally growing grass.

↑
13
cont.

Moreover, as discussed further below, the DEIR appears to create criteria within the alternatives, such as the “decomposed granite” landscaping, which seem designed to create conflict with the project sponsor’s objectives. The narrowness with which the alternatives were draft doom them to rejection.

14

III. THE PROPOSED PROJECT CONFLICTS WITH THE SAN FRANCISCO GENERAL PLAN AND THE GOLDEN GATE PARK MASTER PLAN.

The “propriety of virtually any local decision affecting land use and development depends upon consistency with the applicable general plan and its elements.”³ (*Citizens of Goleta Valley v. Board of Supervisors of County of Santa Barbara* (1990) 52 Cal.3d 553, 570.) Perhaps one of greatest flaws in the DEIR is that it concludes that the proposed project, as planned, is consistent with the San Francisco General Plan and the Golden Gate Park Master Plan. The DEIR concludes:

15

The renovation of the Beach Chalet Athletic Fields facility with synthetic turf and lighting for extended use does not appear to conflict with any adopted plans and goals for the purposes of CEQA. As mentioned above, the proposed project would require a General Plan Referral, which would analyze the project’s consistency with the San Francisco General Plan.

(DEIR, at III-11) Given the objectives of the General Plan to “emphasize the naturalistic landscape qualities of the western end of the park” and the Master Plan to “retain the integrity of the original design of the park”, which included keeping the western end more natural and wild, there is simply no way that a project of this size—which will turn the fields into a high-use, late-night athletic complex—can be considered to be consistent with these plans.

A. The DEIR Does Not Adequately Describe the Conflict Between the Project and the San Francisco General Plan.

While the DEIR selectively quotes from the General Plan where it may be read to support the project, the DEIR avoids direct quotes to the General Plan that may call the wisdom of the Project into doubt. For example, the DEIR does not quote Objective 3 of the Master Plan which states:

16
↓

³ The elements that must be included in every general plan include land use, circulation, housing, conservation, open-space, noise and safety. (Gov. Code § 65302.)

OBJECTIVE 3
ENHANCE THE RECREATIONAL CONNECTION BETWEEN GOLDEN
GATE PARK AND THE BEACH FRONTAGE.

POLICY 3.1

Strengthen the visual and physical connection between the park and beach.

Emphasize the naturalistic landscape qualities of the western end of the park for visitor use. When possible eliminate the Richmond-Sunset sewer treatment facilities.

POLICY 3.2

Continue to implement a long-term reforestation program at the western portion of the park.

(See San Francisco General Plan, Western Shoreline Plan, http://www.sfgov.org/site/planning_index.asp?id=41411, emphasis added). The proposed plan to remove trees and replace grass with artificial turf at the Beach Chalet clearly violates Objective 3 by removing or deemphasizing the naturalistic qualities of the western end of the park.

The DEIR incorrectly states that the Project would maintain visual access between the park and beach, because it would create the visual blight of the added stadium lighting. Part of the aesthetic viewscape is what can be seen (or not seen) when it is dark.

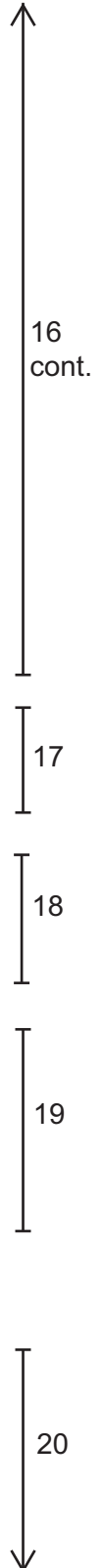
The DEIR also emphasizes what the Project would accomplish for increased access, security, and visitor usage. (*Id.*) However, the DEIR fails to acknowledge in this section that other alternatives would also provide these benefits *without* contradicting the General Plan and Master Plan.

Overall, the DEIR states that the potential conflicts with the General Plan will be “decided by decision makers” apparently at a later date. Golden Gate Audubon disagrees with this assessment and asserts that the DEIR must fully describe all conflicts with existing plans. It is not appropriate to put off this analysis for another day. Moreover, given the bias with which the DEIR is written, it is clearly intended to skew the “decision-makers” that may make those decisions to conclude that there are no conflicts or that they are negligible.

1. The Project Conflicts with the Recreation and Open Space Element (ROSE).

The DEIR acknowledges and states:

The Recreation and Open Space Element policies include development, preservation, and maintenance of open spaces; preservation of sunlight in public open spaces; elimination of nonrecreational uses in parks and reduction of automobile traffic in and



around public open spaces; maintenance and expansion of the urban forest; and improvement of the western end of Golden Gate Park for public recreation.

(DEIR, at III-3). On its face, this text demonstrates that very significant conflict with the ROSE policies, particularly those policies that prioritize the preservation of open space, elimination of nonrecreational uses in parks, and reduction in automobile traffic.

20
cont.

2. The Proposed Project Conflicts with the Transportation Element of the General Plan.

If projections are correct, the new soccer fields will approximately quadruple usage of the soccer fields and will result in a considerable increase in auto use of the area. The proposed project not only does not build “on a tradition of alternatives to the automobile” as stated in the General Plan, it increases the need for and dependence on automobiles. As we build bike routes all around the City we are encouraging the public to use that form of transportation, but this plan only states bike racks will be in the parking lot. It fails to indicate how many or how bike transportation will be accommodated in the area of the Soccer Fields. To make it worse, it doesn’t even mention public transit. The issue of managing how families who use public transit will access the soccer fields, particularly at night, seems to be a major issue. It is however pretty specific about increasing additional parking spaces near the soccer field. This project is clearly in conflict with the General Plan and that must be addressed in the EIR.

21

B. The Project Conflicts with the Golden Gate Park Master Plan.

The Golden Gate Park Master Plan emphasizes the intention of William Hammond Hall, the park’s original planner, for the park’s east end to be highly cultivated while the west end would retain a more wild and natural environment. According to the Master Plan:

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 a pastoral and woodland landscape with open meadows defined by stands of trees and enhanced by lakes . . . It is expected that the Golden Gate Park Master Plan will retain the integrity of the original design

22

(Golden Gate Park Master Plan (1998), at 3-2).

Again, Policy A.1 of Objective II of the Master Plan states “[a]ll activities, features and facilities in Golden Gate Park should respect the unique design and character of the park.” (*Id.* at 3-9) Policy A.2. states:

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.**

(*Id.*, emphasis added)

The DEIR once again demonstrates its bias in the discussion of the Golden Gate Park Master Plan, where it states:

As discussed in the Park Master Plan, the western portion of Golden Gate Park contains most of the park’s larger meadows, lakes, and relatively natural areas, as well as facilities for activities and sports. The project site is designated as a “Major Recreational Area,” according to the plan’s Land Use Map (Figure 3 - 1 of the Park Master Plan).⁵ As such, it was established to meet specific recreational needs, and is programmed specifically to help meet recreational and sports needs (Objective 1, Policy C, Major Recreation Area). The plan requires that land uses and activities in Golden Gate Park contribute to the mission and purposes of the park, and that activities within a designated land use zone should be appropriate to the land use purpose (Objective 1, Land Use and Activities). The project site would be maintained for recreational uses, as proposed by the project, and thus would be consistent with Objective 1 and its designation as a Major Recreational Area.

22
cont.

(DEIR, at III-7). It is extremely notable that the DEIR quotes this portion of the Master Plan, as well as a statement regarding the condition of the athletic fields, but fails to provide direct quotes about the Master Plan’s requirement that the history of the park and the sylvan aspect of the western end of the park be respected.

The DEIR is entirely flawed in its conclusion that

[t]he proposed project would be generally consistent with these policies because the project would be implemented entirely within the boundaries of the existing complex, the proposed turf would be consistent with the character of the use as an athletic field complex, any trees or shrubs removed would be replaced at a ratio of at least 1-to - 1, and the project would not diminish or encroach upon the surrounding open space

23

(DEIR, at III-8) First, it cannot reasonably be concluded that this project preserves or otherwise maintains the naturalistic character of the western end of the park. The statement is further flawed because it characterizes the project as only affecting the “boundaries of the existing complex” and does not acknowledge that (1) light pollution, (2) noise, (3) traffic, (4) additional human activities, (5) trash, and (6) tracking of crumb rubber will occur outside the boundaries of the project, creating a penumbra of environmental and aesthetic impacts that are not truly assessed in the DEIR.

The DEIR also provides no evidence for the conclusion that

24

[i]n addition, lighting of the existing grass soccer fields to extend use hours was also not considered because, at that time, the fields were already at or beyond their use limits for proper maintenance.

(DEIR, at III-9) At the time the Master Plan was drafted, lights had been used for decades to permit nighttime play on grass fields. Clearly, this was an issue that could have been addressed in the Master Plan but was omitted, likely because it would have violated the Master Plan’s directive to maintain the western end of the park in a more naturalistic setting. The DEIR’s conclusion to the contrary is just another example of its bias and failure to base its conclusions on evidence or other verifiable facts.

24
cont.

Finally, the DEIR improperly defers an assessment of the conflicts with the Master Plan to be decided at a later date by another body, notably the San Francisco Recreation and Parks Department Commission, which is the project sponsor. The DEIR states that

[u]ltimately, consistency of the proposed project with the Park Master Plan will be determined by SFRPD Commission when the project is considered for approval.

25

(DEIR, at III-9). Part of the job of the DEIR is to provide an honest assessment of the consistency with the Master Plan, not to defer it to SFRPD Commission. Moreover, what results if the SFRPD determines that the project is inconsistent with the Master Plan? The DEIR should address this issue forthrightly now.

IV. THE DEIR UNDERESTIMATES AND OMITTS IMPACTS TO BIOLOGICAL RESOURCES THAT WILL OCCUR BECAUSE OF THE PROJECT.

As a wildlife and habitat conservation organization, Golden Gate Audubon is particularly concerned about impacts to wildlife, habitats, and the values they present to human visitors to Golden Gate Park. Golden Gate Park has been designated as an Urban Bird Refuge in the Standards for Bird-Safe Buildings. (DEIR, at IV.F-21) After reviewing the DEIR’s assessment of biological impacts from the proposed project, Golden Gate Audubon has concluded that the DEIR underestimates and omits impacts to biological resources. The DEIR’s deficiencies are detailed further below.

A. The Wildlife Surveys Were Inadequate.

The DEIR is notably incomplete in its failure to fully assess all wildlife that use the area. The public, agency personnel, and other decision makers cannot be expected to make informed decisions about impacts if the information provided about biological resources such as local wildlife species are so incomplete.

26

The DEIR states that multiple surveys were conducted and a total of 52 bird species were observed in the area. (DEIR, at IV.F.-18) Unfortunately, the DEIR does not provide adequate information for the reader to assess the quantity and quality of the

wildlife surveys and instead refers the reader to another document on file with the Planning Department.

26
cont.

In any event, the DEIR identifies only seven bird species that use that site. (DEIR, at IV.F-5) Just one Golden Gate Audubon volunteer has observed more than 64 species at the site, including:

Canada Goose	Northern Flicker	Townsend's Warbler
Turkey Vulture	Downy Woodpecker*	Yellow-rumped Warbler
Osprey	Hairy Woodpecker*	Palm Warbler x
Cooper's Hawk	Hutton's Vireo*	Northern Waterthrush x
Sharp-shinned Hawk	Warbling Vireo	California Towhee *
Red-tailed Hawk *	Common Raven*	Fox Sparrow
Red-shouldered Hawk *	American Crow*	White-crowned Sparrow *
Peregrine Falcon	Western Scrub Jay*	Golden-crowned Sparrow
Merlin	Steller's Jay*	Clay-colored Sparrow x
Mew Gull	Barn Swallow *	Song Sparrow *
Ring-billed Gull	Tree Swallow	Lincoln's Sparrow
California Gull	Violet-green Swallow	Dark-eyed Junco *
Western Gull	Pygmy Nuthatch *	Black-headed Grosbeak
Glaucous-winged Gull	Northern Mockingbird *	Western Tanager
Mourning Dove*	Gray Catbird x	House Finch *
Rock Pigeon	Ruby-crowned Kinglet	Purple Finch
Anna's Hummingbird*	Bushtit*	American Goldfinch *
Allen's Hummingbird*	Chestnut-backed Chickadee	Lesser Goldfinch
Say's Phoebe	*	Killdeer
Black Phoebe*	Cedar Waxwing	European Starling
Pac-slope Flycatcher	Hermit Thrush	Brewer's Blackbird *
Olive-sided Flycatcher	American Robin *	Red-winged Blackbird
	Orange-crowned Warbler	Brown-headed Cowbird

27

(* = likely breeding in or near the athletic fields; x = rare or uncommon migrant)⁴ We also refer the Planning Department to comments provided by Mr. Dan Murphy, which provide more specific information on bird use in the area. Other observers have recorded Black-bellied Plover and other shorebirds that use the athletic fields and the Beach Chalet during heavy storm events that make Ocean Beach uninhabitable. The need for these wet, grassy upland refuges may be even more pressing as climate change increases storm intensity and reduces available shoreline habitat. Unfortunately, the DEIR does not address this issue at all or even acknowledge the use of the fields as upland refuges for shorebirds and gulls.

Moreover, raptors and passerines that occur in other parts of Golden Gate Park are also extremely likely to use the Beach Chalet area. According data available on eBird, more than 120 species of passerines have been recorded in the database as using Golden Gate

⁴ Golden Gate Audubon. 2010. Unpublished data, available upon request.

Park.⁵ That number does not include raptors, gulls, or shorebirds, which we also know sometimes use the Beach Chalet soccer fields as a foraging area. The DEIR would be improved if it assessed impacts on wildlife species that do occur in Golden Gate Park as a whole and, therefore, are likely to use the Beach Chalet. The DEIR should also include a comprehensive species list for all affected wildlife.

27
cont.

We also note that while White-crowned Sparrows remain “common”, Audubon Christmas Bird Count data indicate that they are declining in San Francisco. Moreover, the Beach Chalet area provides potential habitat for California Quail, which have been largely extirpated from San Francisco, with a small covey remaining in the Botanical Garden of the park. Further destruction of the habitat contributes to the pressures that have reduced or are reducing local bird populations for species such as the quail and White-crowned Sparrow.

B. The DEIR’s Focus on Special Status Species Downplays Impacts to Species that Lack Special Status.

By focusing only on “special status” species, the DEIR is able to downplay impacts arising from the project to wildlife species. It provides no thorough discussion of impacts to more common species, even those that may be in decline locally, such as the White-crowned Sparrow. It also creates the misconception that since no special status species may suffer significant impacts from the project, that the project is environmentally benign or at least without significant impacts on wildlife.

28

The role of a discussion of impacts on common species in the DEIR is debatable. However, San Francisco holds itself out as the “greenest city in the United States.” Its General Plan and the Golden Gate Park Master Plan prioritize the maintenance of biodiversity. Its Department of the Environment recently adopted a resolution to state that the maintenance of biodiversity was a key priority as well. Given San Francisco’s purported policy to maintain biodiversity, the DEIR should do a better job of discussing all impacts, even those to species that are not provided with a special status designation.

C. The Impacts Analysis Is Incomplete and Biased.

The DEIR’s approach to conservation of local birds is, essentially, the attitude that the birds and other wildlife that use the Beach Chalet can go “elsewhere”. This is the kind of disregard for wildlife that has resulted in decades of habitat loss in San Francisco and elsewhere, along with a subsequent decline in local biodiversity. We argue that the DEIR should not just look at the impacts on a regional scale, but also on a local one that focuses on the western end of Golden Gate Park, a true island of habitat surrounded by homes and other developments that can be actively hostile to birds’ survival. The DEIR reflects the attitudes of those that are satisfied to push wildlife into ever smaller and more fragmented pieces of habitat. At which point will San Francisco’s leaders take responsibility for considering wildlife and habitats in balance with active recreation?

29

⁵ A bar chart of occurrences of species in Golden Gate Park based on data submitted to eBird is available at <http://bit.ly/t5rMDM>

In any event, the DEIR's approach is also flawed at a legal level because it overstates the availability of "comparable" habitat to which birds may be evicted and because it fails to address direct impacts to birds, such as noise, lights, increased levels of human disturbance, trash, and changing species dynamics.

1. Impact BI-1 Overstates Available Comparable Habitat.

The DEIR downplays potential impacts to sensitive or special-status species by stating that 200 acres of "similar" habitat exists in Golden Gate Park, including a golf course, archery range, and the Bison Paddock. (DEIR, at IV.F-23) First, the DEIR should explain the process and criteria for ranking these areas as "similar" for purposes of assign impacts. For example, the golf course has very different landscaping goals, is not closed as often as the Beach Chalet fields, and has active (and apparently successful) gopher control efforts. Second, Golden Gate Audubon finds it somewhat shocking that the DEIR would suggest that the archery range—which *presumably includes the regular activity of arrows flying through the air*—would provide suitable replacement habitat for the Beach Chalet.

The DEIR states that the loss of approximately 9 acres of habitat represents a loss of approximately 4.5% of "similar habitat" or "0.3% of similar foraging habitat (e.g., turf grass and grasslands)" in Golden Gate Park but, again, provides no basis for assessing the "similarity" at issue. (See DEIR, at IV.F.-23, 24) The DEIR's authors cannot in good conscience assert that the fields in the eastern end of Golden Gate Park, which are much more intensively used and occupied by humans and dogs, provide "similar" habitat for raptors as the Beach Chalet.

The DEIR further downplays the loss of habitat by asserting that 7,050 acres of "open space" are available within a 5-mile radius. (DEIR, at IV.F.-24, footnote 30) Golden Gate Audubon notes that the 5-mile radius includes the Golden Gate National Recreation Area, including Ocean Beach, the Presidio, and parts of the GGNRA in southern Marin County. A review of an area map (see Figure 2) demonstrates that even in these "open space" areas, few large, open grass meadows are available, especially in areas that are relatively dark at night and undisturbed for much of the year.

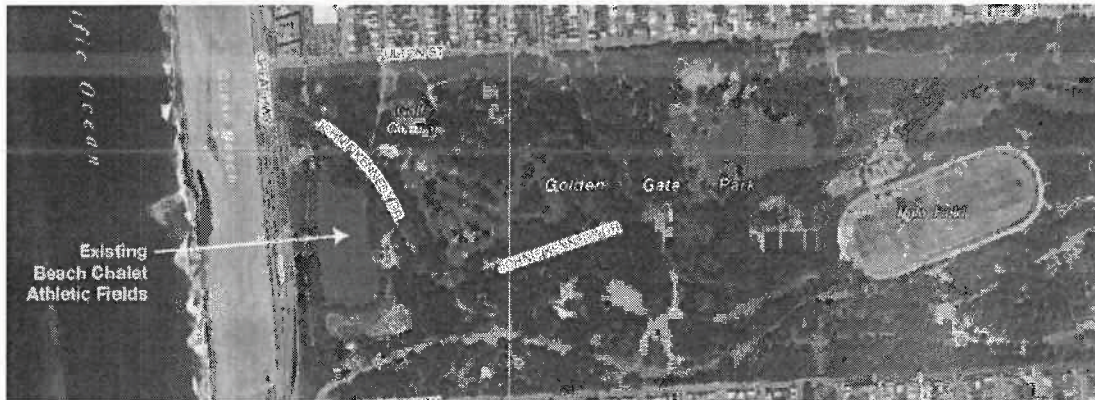
In short, the DEIR's lumping of all grasslands and turf into a "similar habitat" category unduly minimizes the value of the grass fields at the Beach Chalet, downplays the biological impact, and constitutes a significant flaw in the DEIR. The DEIR must be revised to provide the criteria by which the "similarity" of habitat was assessed so that readers and decision makers can make the assessment for themselves rather than relying on the DEIR's unsupported conclusions.

As the image provided on page II-3 of the DEIR demonstrates, the Beach Chalet soccer fields constitute the second-largest contiguous open grass meadow in the western portion of Golden Gate Park, second only to the Polo Fields. The DEIR blithely concludes that birds will go elsewhere. However, it does not mention of the lack of open grassy habitat

29
cont.

in this portion of the city (or in San Francisco as a whole). The loss of this much open grassy habitat should have been assessed, especially given the lack of such habitat in San Francisco as a whole. This is part of the requirement to consider impacts, especially cumulative impacts, within the context of the present, compromise environment.

Figure 1. Map of western end of Golden Gate Park, from page II-2 of the DEIR. Note that the Polo Fields are the only contiguous open meadow habitat similar in size and structure to the Beach Chalet in Golden Gate Park.



We note that the DEIR does not provide a map of the entire 5-mile radius purportedly assessed in the DEIR. A review of Google Images demonstrates that there are very few other open meadows that are the same size as the Beach Chalet or larger in San Francisco, let alone the western side of San Francisco. (See Figure 2 below) The DEIR should not assess all "open space" in the aggregate but, rather, similar habitat with similar characteristics (i.e., large open meadow, relatively dark at night, relatively low-levels of disturbance during many parts of the year. As written, the DEIR's analysis of purportedly similar habitat is incomplete and misleading.

29
cont.

Figure 2. Map of San Francisco. Meadows of similar size to the Beach Chalet or larger are highlighted with a solid polygon.



29
cont.

2. The DEIR Fails to Adequately Describe Impacts from Lights, Noise, Increased Human Activities, Pollution and Other Byproducts of the Project on Biological Resources.

a. The DEIR fails to adequately discuss the impacts of lights on wildlife.

The DEIR acknowledges that the installation and use of the 60-foot stadium lights “has the potential to interfere with migratory corridors” and impede nesting birds and other wildlife in the area. (DEIR, at IV.F-26). However, the DEIR concludes, without providing any evidence, that this impact will be less than significant.

First, the DEIR acknowledges that the migratory patterns through San Francisco is unknown. Local birders and biologists have identified the western end of Golden Gate Park as an important migratory corridor, especially for passerines. Before merely assuming no impact, the DEIR would be improved by actually studying the problem and, where information is absent, err on the side of protecting the wildlife resource rather than assuming it will endure the impact.

Second, the DEIR is notable in its failure to discuss compliance with the San Francisco *Standards for Bird-Safe Buildings*. (DEIR, at IV.F.-27) While the DEIR acknowledges that Golden Gate Park is an Urban Bird Refuge, the DEIR does not describe the conflict between the project and the Standards requirement that there be a “minimal use of lighting.”

Third, the DEIR assumes, without providing evidence, that the new lighting would not appear as a point source from above. The synthetic turf material and bleachers are likely to be much more reflective than natural grass or the woods in the area that exist now. Fog may play

30

a role in amplifying the light as well. There is simply no information provided in the DEIR to assess the veracity or credibility of this assumption.

Fourth, the DEIR primarily addresses the displacement of nesting birds due to lighting (and other impacts) by stating, without providing supporting evidence, that there is “abundant habitat available to them elsewhere within Golden Gate Park.” (DEIR, at IV.F.-29) While there are, indeed, many other trees and shrubs in the park, the DEIR should provide a scientific or factual basis for the assumption that those areas (1) are available (i.e., not already occupied), (2) provide adequate replacement habitat, and (3) that the wildlife in question can be expected to successfully move to the “replacement” habitat and breed. The DEIR does not provide any such information.

30
cont.

Fifth, the DEIR discusses several raptor species, but it virtually ignores owls. Great-horned Owl and Barn Owls have been observed in the area after sundown. Presumably, ESA’s wildlife surveys were not conducted at night. Lighting can have very significant impacts on owls and their prey. Additional study of nocturnal wildlife must be conducted before a credible conclusion of no impacts can be rendered in the EIR.

b. The DEIR underestimates noise impacts on wildlife.

The DEIR acknowledges that increased noise levels at the site may have an impact on local wildlife populations. (DEIR, at IV.F-30) Ultimately, the DEIR dismisses these concerns and asserts that the noise at the site will be like “distance traffic noises” to which birds will adapt (or not). (See *id.*) The DEIR concludes, without providing any supporting evidence, that the “proposed project is not expected to have a substantial effect over that of baseline conditions on avian reproduction in the project area.” (*Id.* at IV.F-31)

31

Golden Gate Audubon asserts that the noise levels at the athletic fields after the project is completed will be much different than those that exist now. First, there will be more people and cars making noise in the immediate vicinity. Second, the noise levels will be more persistent throughout the year as more play is accommodated at the field each day. Third, the noise levels will extend late into the night, a wholly new impact in an area of relative calm at night. Fourth, the DEIR does not address whether reflect whether the artificial turf will reflect noise levels at a different level than natural grass (which may be better at absorbing sound).

c. The DEIR does not address impacts from increased human activity (i.e., “direct disturbance” at the site) other than construction impacts.

The Biological Resources section is silent as to impacts arising from the increase in human activity at the site other than those associated with the initial construction. Clearly, the substantial increase in field usage will result in more people populating the area, resulting in more direct impacts on and interactions with wildlife. More people means more incursions into the vegetation, more food waste and other trash, and more dogs. Moreover, the DEIR

32

does not address the “construction” impacts that must arise when the turf field will be replaced, something that is wholly predictable and acknowledged in the DEIR.

d. The DEIR does not address impacts to wildlife arising from changes in species dynamics at the site.

Species such as House Sparrow, Common Raven, and American Crow thrive around human development and activity. These species may be expected to increase in and around the playfields, especially if there is more human food waste in garbage cans or littered on the ground. These species can have significant negative impacts on other birds and wildlife. The DEIR should discuss these potential impacts and propose mitigation measures (e.g., wildlife-proof trash containers, regularly trash clean-up, etc.) to reduce their occurrence and the severity of subsequent impacts.

32
cont.

V. THE DEIR INADEQUATELY ADDRESSES HYDROLOGICAL IMPACTS.

The DEIR’s authors take pains to emphasize that even though the artificial turf may leach toxic heavy metals, those impacts are “less than significant”, even when considered under cumulative impacts. (*See, e.g.*, DEIR at IV.G-28) The DEIR reaches this conclusion even though it acknowledges:

[T]he composition of tire crumb is dependent on the tires used in the manufacturing process and can be variable. **Therefore, the quality of stormwater runoff and leachate from the proposed synthetic playfields is unknown and could contain pollutants that could degrade groundwater quality.**

(DEIR, at IV.G-29 (emphasis added)) The DEIR relies on vaguely described “underlying liner” that will apparently capture all leachate and storm water runoff from the site, without describing the nature or efficacy of the liner. (*See id.* at IV.G-25) Moreover, by relying on actions taken by the SFPUC to regulate water discharge from the site—something there is no guarantee will be done—the DEIR improperly defers mitigation of the impact.

33

The DEIR is silent as to the fact that the San Francisco Public Utilities Commission (SFPUC) is currently planning to extract 4.1 million gallons of water from aquifers in San Francisco to mix with water from the Hetch Hetchy reservoir. That would amount to a reported 10% of the water used locally. The SFPUC is also starting a program to increase the amount of rainfall that can make its way to the aquifer. The SFPUC is discussing the use of swales, water gardens catch basins and several other innovations designed to capture water to charge the city’s aquifer.

Golden Gate Audubon is informed and believed that materials from this project are likely to leach into the groundwater supply. As such, the use of artificial turf is in conflict with the San Francisco Groundwater Supply Project and appears to conflict with the goals of

the SFPUC rainwater harvesting program. The DEIR is silent as to these impacts and conflicts and should be amended to address them.

33
cont.

VI. ALTERNATIVES

An EIR must include an adequate discussion of alternatives to ensure informed decision making in the selection of one alternative over another. (*See San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 735 [“A major function of an EIR ‘is to ensure that all reasonable alternatives to proposed projects are thoroughly assessed by the responsible official.’” (citation omitted)]; *see also* Pub. Resources Code, § 21002.1(a) (a) [purpose of EIR includes identifying alternatives to the project].) The “reasonableness” of alternatives, which is assessed in part on their financial and physical feasibility. (Pub. Resources Code, § 21061.1)

The alternatives proposed must be designed to reduce or avoid one or more of a proposed project’s potentially significant impacts. (CEQA Guidelines, § 15126.6.) The explanation provided by the lead agency for the selection of an alternative must be adequate to ensure a informed public discussion. (*Stand Tall on Principles v. Shasta Union High Sch. Dist.* (1991) 235 Cal.App.3d 772, 786.) The “EIR must explain why each suggested alternative either does not satisfy the goals of the proposed project, does not offer substantial environmental advantages[,] or cannot be accomplished.” (*San Joaquin Raptor/Wildlife Rescue Center*, 27 Cal.App.4th at 737; *see also* CEQA Guidelines, § 15091(c) [stating that when an agency finds that alternatives are infeasible, it must “describe the specific reasons for rejecting” the alternatives].)

34

The DEIR does not discuss an adequate range of reasonable alternatives and mischaracterizes the differences between the proposed project and the alternatives, with the effect of downplaying the benefits of the alternatives and the environmental impacts of the project. As discussed in detail below, the DEIR must be revised to (1) reflect a real range of reasonable alternatives and (2) include an honest, independent discussion of alternatives that is not dictated by the project sponsors.

A. The DEIR Fails to Discuss an Adequate Range of Reasonable Alternatives.

The list of alternatives provided in the DEIR does not constitute an adequate consideration of reasonable alternatives. (*San Joaquin Raptor/Wildlife Rescue Center*, 27 Cal.App.4th at 735) While CEQA does not require every conceivable alternative be assessed, it does require a full review of available alternatives. By failing to provide adequate alternatives and discussion thereof, the DEIR is fatally flawed and must be revised.

First, the Beach Chalet Athletic Fields renovation is intended to serve regional soccer needs, not just those in the western or northern part of the city. (*See, e.g.*, DEIR at II-1 [“The Beach Chalet Athletic Fields are one of three primary ground sports athletic facilities citywide....”], and at II-10) The list of alternatives fails to include any other sites that would

also serve “citywide” (though users from outside the city are anticipated as well). Instead, the alternatives analysis is limited to only one, relatively limited site nearby the fields, the West Sunset Playground. At a minimum, the EIR must be revised to include other alternatives that could meet the citywide need for more playing fields.

Second, as discussed more fully below, several of the alternatives appear to include provisions intended to bring them into conflict with the project sponsor’s objectives. For example, there is not a good reason given why Alternatives 2, 3, and 4 must include the “decomposed granite” border, which may create conflicts with ADA requirements. This kind of positioning appears to be intended to reduce the viability of the alternatives.

Finally, the DEIR is silent as to the economic feasibility of the alternatives, especially as compared to the proposed project. Golden Gate Audubon has been made to understand that the Beach Chalet renovation will exceed \$10-12 million. We also understand that the Polo Fields renovation, which rerturfed seven playing fields, cost approximately \$2 million. Clearly, some of the project objectives (e.g., decreased maintenance) could be offset or addressed through the significant financial savings that one of the alternatives may provide (e.g., some of the funds saved could be dedicated to ongoing maintenance of naturally growing grass fields, which would improve safety and access, decrease biological, hydrological, and hazardous materials impacts, and be more consistent with the historic and cultural values of the western end of Golden Gate Park). By failing to forthrightly analyze these alternatives, the DEIR is unfairly skewed toward the proposed project.

34
cont.

B. The Alternatives Analysis Misrepresents the “Similarity” of Biological and Hazardous Materials Impacts.

The DEIR erroneously characterizes Alternatives 2, 3, and 4 as having “similar” impacts to the proposed project despite significant differences in the nature of each alternative, especially when compared to the proposed project. (*See, e.g.,* Table VI-1) Alternative 2 and 3 would maintain the natural turf at the Beach Chalet, where it would continue to provide forage and refuge for birds and other wildlife. Alternatives 2, 3, and 4 would significantly reduce or eliminate the changes to lighting in the western end of Golden Gate Park, also resulting in fewer impacts to birds, bats and other wildlife (as well as fewer aesthetic impacts).

The DEIR also characterizes Alternatives 2 and 3 as having “similar” hazardous and hazardous material impacts. (*See, e.g., id.*) However, Alternative 2 would obviate the need for 400 tons of material to be removed from the site in 8-10 years, which the DEIR acknowledges will take up “valuable landfill space”. Notably, the DEIR fails to identify that the material will also have to be disposed of as hazardous material. Moreover, by ranking the impact as “similar”, the DEIR downplays the fact (that it concedes elsewhere) that the artificial turf may leach heavy metals and other contaminants into ground water and the local environment. Finally, the DEIR does not address at all the issue dispersal of the crumb rubber from the project site, where it may enter storm water, be consumed by wildlife, or result in exposures to children and other park users.

35

The DEIR's assumption that impacts are similar is contrary to the purpose of CEQA, which is to ensure decisions that are most protective of the environment. The DEIR acknowledges that

[a]lthough it is unknown whether this alternative would reduce biological resources impacts and/or hazards and hazardous materials, **this analysis conservatively assume that similar impacts to these topics could occur.**

(DEIR, at VI-9 [emphasis added]). We note that the true "conservative" approach is to (1) perform an adequate analysis to differentiate potential impacts between alternatives and/or (2) not to assume impacts are "similar" in the absence of information. This conclusion, which conveniently supports pushing the preferred project through, appears to fly in the face of the purpose of CEQA.

35
cont.

C. Alternative 2 (the Off-site Alternative) Is the Environmentally Preferable Alternative and should be Selected for the Project.

The DEIR states that Alternative 2 would:

1. not be inconsistent with the Golden Gate Park Master Plan;
2. would increase overall play time and availability of fields;
3. would provide a "safe, optimal recreational facility";
4. reduce ongoing maintenance costs; and
5. comply with ADA requirements.

(DEIR, at VI-8). We note that Alternative 2 would provide benefits not described in the alternatives analysis. The DEIR should be amended to better consider these and other benefits. These include:

1. improved access to public transportation;
2. improved access to athletic facilities for neighbors adjacent to the park; and
3. reduce traffic and congestion in Golden Gate Park.

After a cursory statement of benefits, the alternatives analysis lingers instead on what Alternative 2 will purportedly not accomplish. According to the DEIR, Alternative 2 would not result in increased use or access improvements to the western end of Golden Gate Park. (*Id.*) Golden Gate Audubon would ask why this particular objective (or set of objectives) is so important to the Recreation and Parks Department and the Planning Department. If, as the Golden Gate Park Master Plan requires, the western end is to be maintained in a more sylvan state, than the stated objective of development and lighting to increase visitor usage through degrading the natural state of the park seems to be directly in conflict with the Plan. As such, this objective is not a valid reason for rejecting Alternative 2.

36

The DEIR correctly identifies Alternative 2 as the “environmentally superior alternative”. (DEIR, at IV-14) Golden Gate Audubon asserts that if the DEIR were written in a less biased manner and/or if Alternative 2 was slightly modified, it could achieve all of the project sponsor’s legitimate and prioritized objectives while preserving the western end of Golden Gate Park as intended in the Master Plan.

36
cont.

D. The Analysis for Alternative 3 Demonstrates that the Alternative Was Designed to Be Rejected.

Alternative 3 (Grass Turf with Reduced Lights) would substantially reduce impacts to biological and historical resources at the Beach Chalet site, but it is clearly designed to be an outlying objective and is set up to be rejected. For example, it includes unnecessary features that make it unattractive and contrary to the Project Sponsor’s objectives, including “decomposed granite” may reduce access or ADA compliance.

The analysis also seems to rely on several unsubstantiated assumptions. For example, it states that hazards and hazardous materials impacts are anticipated to be similar to the proposed project. (DEIR, at VI-11) Remarkably, this alternatives analysis omits discussion of the need to dispose of at least 400 tons of rubber material that will be considered hazardous materials at the end of the artificial field’s lifetime. The DEIR is also silent on the issue of dispersal of the rubber crumb to the adjacent environment, resulting in exposures to wildlife and humans and its persistence in the environment. The DEIR also seems to assume, without evidence, that the large stadium lights described in the proposed project will ensure increased visitor safety and increased nighttime use of the western end of the park significantly more than will occur under Alternative 3. The DEIR is also silent on the lesser impact to transportation and traffic congestion.

37

We also note that the alternatives analysis is written in such a way as to reflect the bias of the DEIR’s authors. For example, where the DEIR acknowledges that Alternative 3 would have fewer aesthetic impacts due to lights, it also inserts that dubious conclusion that the aesthetic impacts under the proposed project would be less than significant. (*Id.*) It repeats this tactic in its discussion of impacts to water resources and hydrology. (*Id.*)

Finally, the alternatives analysis is silent regarding Alternative 3’s consistency with the Golden Gate Park Master Plan, especially as compared to the proposed project. Clearly, maintaining a naturally growing turf field will permit the facility to continue providing at least some habitat value for wildlife in the area and for people who visit the site to observe wildlife

E. The Analysis for Alternative 4 Should be Revised to be More Complete and Unbiased.

Like the analysis for Alternative 3, the DEIR’s description of Alternative 4 appears to be calculated to precipitate its rejection. The alternatives analysis relies on many of the same unsubstantiated assumptions regarding visitor safety and usage because of the change in the

38

lighting scheme. (See, e.g., VI-13) Alternative 4 also includes, unnecessarily, the “decomposed granite” which brings it into conflict with ADA requirements.

↑
38
|
cont.

VII. CONCLUSION

In all, the DEIR is fatally flawed for its inadequate assessment of impacts, failure to proposed any real mitigation measures, and the failure to include an adequate range of reasonable alternatives. Given the high historic and biological value of the western end of Golden Gate Park and San Francisco’s oft-stated desire to be the “greenest city in the United States”, a project such as this one deserves heightened scrutiny from decision makers such as the Commission and a better EIR.


Frederick Law Olmsted, who spoke of the long-term management of Golden Gate Park in an 1886 letter to the Park Commissioners. He wrote:

[L]et me counsel you, in general terms, to remember that your park is not for today, but for all time - so long as you have a city. You have your present population to satisfy and please. It is an intelligent population, beyond a doubt, and possessed of a high appreciation of good results. But it is to be expected that future generations will be more intelligent and more appreciative.

(Golden Gate Park Master Plan, at 1-6). Before this EIR is completed or certified and before this project proceeds, we ask that the Planning Department, Recreation and Parks Department, the Commissions and the Supervisors consider Olmsted’s words and remember that this park is not just for us or for our current needs and hobbies, but for future generations to use and enjoy. Once this habitat is changed, it will be gone forever and while we may take White-crowned Sparrows and Dark-eyed Juncos for granted now, we and subsequent generations will miss them when they are gone.

Thank you for your consideration of our request. If you would like to discuss this further, please do not hesitate to contact me at (510) 843-6551 or mlynes@goldengateaudubon.org

Sincerely,



Michael Lynes
Conservation Director



Golden Gate Park Preservation Alliance ©

"Destroy a public building and it can be rebuilt in a year; destroy a city woodland park and all the people living at the time will have passed away before its restoration can be effected."

William Hammond Hall, Surveyor
First Superintendent of Golden Gate Park

To: Charles Chase, President
Historic Preservation Commission
Date: November 16th, 2011
Re: Preliminary review
Draft Environmental Impact Report (DEIR)
Beach Chalet Athletic Fields
RE: Case No. 2010.0016E - Beach Chalet Athletic Fields

Dear Commissioner Chase:

We have quickly reviewed the DEIR and have the following comments, which we hope will help at the discussion at the HPC. We will be sending a longer letter to the Planning Department with all of our concerns.

Proposed Project continues the pattern of threatening the historic design of Golden Gate Park

The Department of Recreation and Park has consistently ignored the value of Golden Gate Park's historic landscape elements. This disregard was made clear with the first designs for this project. Despite requests for modifications -- both from the public and from the Historic Preservation Commission -- very little has been changed from the initial, hard-edged, inappropriate design that the HPC first viewed over one and a half years ago. The project's basic elements continue to include the artificial turf, the 60 foot stadium lighting, the rectilinear paths and fencing, the stadium seating, the increased parking, the loss of windbreak trees, and other built elements. (DEIR, p. ES-1 , 2)

This project goes against the over-riding design of the Park as outlined in the **Golden Gate Park Master Plan**:

*"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**." (p. 3-2)*

"The landscape of Golden Gate Park is its most prominent feature, and is what attracts people to the park. The park landscape is the sum of many components: terrain, forests, meadows, horticultural displays, lakes, athletic fields, and climate..."(p.4-1)

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..."(p4.5)

The DEIR states that the Recreation and Park Commission is the final arbiter as to whether or not the project fits into the concepts of the Golden Gate Park Master Plan. The current Recreation and Park

01

Commission has never over-ruled the wishes of the Department. In fact, most decisions are made with a unanimous vote by the Commission. **We can assume that once the EIR has been finalized, the Recreation and Park Commission will once again ignore their own planning document and vote to destroy the bucolic nature of the western end of Golden Gate Park.**

02

National Register of Historic Places:

According to the DEIR, the proposed project is contrary to the Secretary of the Interior Standards; we have recently experienced attacks on the Secretary of the Interior Standards. Since there is the possibility that the Golden Gate Park Master Plan may not be upheld, it is important to recall the National Register descriptions of Golden Gate Park:

“Golden Gate Park was conceived as a naturalistic pleasure ground park to provide a sylvan retreat from urban pressures for all citizens, rich and poor.” (Sec 7, Page 1)

“Although the park contains the individual resources listed here, it is important to view Golden Gate Park as a whole. Golden Gate Park was developed over many years, but it was conceived as a single creation that we now consider an historic designed landscape” (Sec 7, page 2)

03

“In an historic landscape such as Golden Gate Park, integrity should not be tied to any individual trees or even specific species. It is the spatial relationships between evergreen forest and the open meadows that are the significant feature” (Sec 7, page 6)

“Spatial Relationships ... The western park is a natural woodland park, and the eastern park is a more finished park with gardens and other features. The division was part of the original design as described by William Hammond Hall,

‘Western Park Character: It was designed that the six hundred or more acres of the reservation including and lying to the west of Strawberry Hill and it’s connecting ridge, should 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 grasses” (Sec 7, page 7)

“The perimeter consists of solid planting that was meant to screen out the surrounding urban environment, reinforcing the park’s role as an escape from all things urban” (Sec 7, page 7)

“Buildings and Structures .. With few exceptions, the buildings in Golden Gate Park support the recreational mission of the park. Buildings in the park were kept to a minimum because they were viewed as intrusions to the naturalistic landscape.” (Sec 7, page 11)

Deficiencies in the Draft EIR

The DEIR views the Beach Chalet Athletic Fields as an isolated part of Golden Gate Park, without considering the larger picture of its place in the park’s overall design. For example, because the Beach Chalet Athletic Fields are one of "137 contributing resources to the District" (DEIR p. IV-C-28), the DEIR is not overly concerned with the potential loss of the fields. The DEIR also compares the "6.8 acre" fenced athletic field to Golden Gate Park's 1,000 acres (note that the DEIR has selected the smaller, fenced area - the entire meadow is closer to 11 acres). This puts the Beach Chalet athletic fields at "less

04

than 1% of the total acreage of the park." This figure ignores the large number of roads, buildings, utilities structures, statues and other built elements that are gradually but inexorably eating up the parkland. However, if we value Beach Chalet as a contiguous piece of parkland, we can compare Beach Chalet's 11 acres to the "130 acres of meadows, fields, and open areas" (DEIR, p. IV-E-2.). In this case, the loss of this meadow is the loss of almost 9% of the remaining open areas. Giving a sundial (1907, bronze) the same importance as a large meadow may be one technique for counting historic elements, but it ignores the over-riding value of Golden Gate Park's parkland. **Can we really offset the loss of a large meadow with a few statues and restroom buildings and feel that we have preserved the integrity of the Park, to say nothing of its beauty and value to San Franciscans?**

04
cont.

Problems with the project objectives:

The project objectives are self-fulfilling - that is, they are written to make the Beach Chalet Athletic Fields in Golden Gate Park the only location that fits these goals. For example, "Improve safety and increase nighttime use of **the west end of Golden Gate Park...**" (p. II-5) . This objective precludes placing the project in another location.

Project objectives are not substantiated:

- **Why is increased night use a benefit for the Park?** What is the justification for this goal? There have been many problems with visitors in the park at night for the large festivals - -why is it a goal now to encourage night use of an area that the DEIR describes as isolated? Would this cause more problems to occur? Night lighting does not always result in security. Where is the study of the actual crime that occurs in this area and the need for lighting specifically of the type used in the sports fields to control it? The on-line crime statistics show that most crime occurs in areas that are lighted - around the Park Chalet and on the roads in the park. Where are the reports of crime at Beach Chalet Athletic Fields compared to the rest of Golden Gate Park and to other parks and areas of the City? Why is it necessary to install artificial turf and the other built elements to provide security? What is the police presence now and what will it be in the future? What other alternatives to this project might meet this goal?
- A second project objective is to **provide a sports facility in the northern part of San Francisco.** **What is the data that substantiates that this is needed in this area?** The DEIR traffic report states that most of the players will arrive at the Beach Chalet Athletic Fields by car. This is backed by the project increasing the size of the existing parking lot, which is counter to San Francisco's goal of being a transit-first city. Personally, we have seen few bicycles at the fields. If everyone is driving, why does the project have to be located in this area?
- Another project objective is **renovating the restroom building** at Beach Chalet Athletic Fields. This is a worthy goal, but hardly worth substantiating the destruction of parkland and the expense of a \$9.8 million project. **What alternative could accomplish this objective?**

05
06
07

Alternatives are poorly researched and designed to fail to meet the project objectives (Section VI)

- Alternative 2: Off-site alternative. The project objectives oriented towards only the location in Golden Gate Park have caused the DEIR to give little consideration to any alternatives outside of Golden Gate Park. For example, **the West Sunset Playground alternative is dismissed**, because it does not fulfill the project objective of providing athletic opportunities in the northern part of San Francisco. What is the substantiation for this project objective? The DEIR traffic report states that most of the players will arrive at the Beach Chalet Athletic Fields by car. West Sunset Playground is two miles from Beach Chalet, a matter of a few minutes by car.

08

- Alternative 3: Grass Turf with Reduced Lights -- **This alternative is disingenuous.** If the current fields cannot sustain play for long periods of time because they are natural grass, how will the grass stand up to added lights and increased hours of play? If real grass can sustain long hours of play with renovation, why aren't the fields being renovated now with real grass so that this project can be avoided? Why does the DEIR state that installing lights would remain consistent with the Golden Gate Park Master Plan? What language in the Master Plan is this referring to? What studies support the statements of needing more maintenance for the grass? What kind of maintenance would be performed that cannot be performed now with the stated 1/3 FTE for the fields? 09
- Alternative 4: Synthetic turf without lights - **The DEIR states that this is consistent with the Golden Gate Park Master Plan - what is the basis for this statement?** Where does it say in the GGPPM that this is acceptable? The same questions about safety, crime, and lighting would have to be asked as listed above. What is the removable seating that is referred to? What does it look like? How large is it? How is it brought in and taken out? What would prevent it from becoming a *de facto* site feature? Decomposed granite is not accepted as an ADA material by San Francisco -- why is it continually mentioned as an option for the pathways? 10

Conclusions

- We support alternatives that protect Golden Gate Park's historic character while providing more playing hours for youth. We believe that this should include pursuing locations outside of Golden Gate Park for parts of this project. **One solution is to combine Alternative #2, renovating the West Sunset Playground with an improved playing surface and lighting for some or all of its fields AND parts of Alternatives #3 and #4 - renovating the Beach Chalet Athletic Fields with real grass and no lights.** 11
- This solution would do the following:
 - Increase the amount of playing time at both facilities;
 - Improve some public access to Beach Chalet Athletic fields -- but not as much access would be needed due to the lower use than the proposed project;
 - Provide two good athletic fields close to the northern part of San Francisco available to a wider variety of players;
 - Provide amenities at either Beach Chalet or at West Sunset, as needed by the projected usage (West Sunset already has extensive bleachers);
 - Remain consistent with the Golden Gate Park Master Plan.

We will be submitting a more thorough analysis with questions that we would like to see answered in the Final EIR, and we look forward to seeing the HPC's comments. We know that the HPC will review the DEIR carefully and work to protect the historic integrity, beauty, and value of Golden Gate Park as a landscape park.

Sincerely,

Katherine Howard, ASLA
Member, Steering Committee

HAIGHT ASHBURY NEIGHBORHOOD COUNCIL

RECEIVED AT CITY HEARINGS 11-17-11

Beach Chalet
{D. LEWIS}

Richard Ivanhoe
President

Joey Cain
Vice President

Michelle Welch
Corresponding Secretary

Kevin Bayuk
Recording Secretary

Jim Rhoads
Treasurer

Calvin Welch
Housing and Land Use Chair

Tes Welborn
Membership Chair

Elizabeth Kirchner
Nominating Chair

Karen Fishkin
Recycling Chair

MEMBERS-AT-LARGE

Colleen Rivecca

Karen Masonheimer

Bruce Wolfe

Robert Leon

Burt Phillips

Ed Dunn, Director
*Recycling Center &
Native Plant Nursery*

November 15, 2011

Ms. Christina Olague
President
San Francisco Planning Commission
1650 Mission Street, Room 400
San Francisco, CA 94103

RE: Beach Chalet Soccer Field Draft EIR

Dear Ms. Olague:

The Board of the Haight Ashbury Neighborhood Council supports the request of SF Ocean Edge and others to extend the period of public comment on the draft EIR regarding the Soccer Field (Beach Chalet Athletic Field) for 90 days.

The draft EIR is lengthy and complex and requires additional time for the public to review and respond to it.

This is a huge change proposed for Golden Gate Park (7 acres of artificial turf and large-scale sports lighting) and deserves extremely careful oversight and deliberation.

Please consider the extension of the comment deadline by 90 days.

Regards,



Michelle Welch
Corresponding Secretary, HANC

01

PAR Planning Association for the Richmond

5758 Geary Boulevard, #356, San Francisco, CA 94121-2112
(415) 541-5652 Voicemails and Facsimiles; (415) 668-8914 Direct Calls and Voicemails
president@sfparr.org or raymondsnf@aol.com

RECEIVED

November 11, 2011

NOV 15 2011

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

CITY & COUNTY OF SF
PLANNING DEPARTMENT
M.F.A.

Re: Draft Environmental Impact Report on Beach Chalet Soccer Field Project --- Request for 60-Day Extension of Public Comment Period

Dear Mr. Wycko:

The Planning Association For the Richmond (PAR) requests a 60 day extension of the public comment period for the above-referenced draft EIR, extending the period from the current deadline of December 12, 2011 to February 10, 2012. PAR is the largest neighborhood association in the Richmond and is keenly interested in the proposed project.

This extension is requested for several reasons. First, the Draft EIR is over 350 pages in length and involves complex, controversial issues that require a considerable amount of time to analyze and develop responsible input by our organization. PAR's next board meeting is not until January 9, 2012. PAR cannot issue a comment letter on the Draft EIR without first being vetted and approved at our Board meeting. Preferably, for an issue of this complexity, PAR would need two monthly meetings to develop and finalize its comments. Thus, an extension until February 10, 2012 is imperative.

01

Second, a comment period that ends during the month of December creates an unreasonable burden for the public in general to provide responsible comment, due to the predictable year-end demands and preceded by the Thanksgiving holiday period, which is one of the busiest travel periods.

Third, the legislative purpose of the public comment period under NEPA and CEQA is to provide the decision makers with quality, informed public comment to assist in the decision-making process in a constructive manner. Unless this requested extension is granted, that legislative purpose will be significantly compromised.

Please advise me as soon as possible whether this request has been granted.

Thank you very much.

Sincerely,



Raymond R. Holland
President

From: Raymondsnf@aol.com
To: bill.wycko@sfgov.org, don.lewis@sfgov.org
cc: c_olague@yahoo.com, rm@well.com, wordweaver21@aol.com, plangsf@gmail.com, mooreurban@aol.com, hs.commish@yahoo.com, rodney@waxmuseum.com, john.rahaim@sfgov.org, linda.avery@sfgov.org

Date: Monday, December 12, 2011 03:27PM
Subject: PAR Comments With Respect To 10/26/2011 Beach Chalet Soccer Fields DEIR

Dear Messrs. Wycko and Lewis:

The following are comments and suggestions from the Planning Association for the Richmond (PAR) with respect to the accuracy and scope of the Draft Environmental Impact Report for the Beach Chalet Soccer Fields (Planning Department Case Nos. 2009.029E and 2010.0275E).

Cumulative Effects: The Beach Chalet Soccer Fields & The Water Treatment Plant

While both projects identified above would be located next to each other in the western end of Golden Gate Park, the Planning Department and its commission are conducting sequential environmental reviews of each project separately. The California Environmental Quality Act (CEQA) requires that the "cumulative effects" of all environmental impacts on a common area be assessed.

As indicated in its communications of March 4th, November 22nd and December 1st of this year, PAR believes that, in order to assess the "cumulative effects" of both projects, the environmental impacts from each project cannot be assessed and applied sequentially. As a result, PAR suggests the DEIRs for both projects be considered concurrently.

A possible alternative would be for the Planning Commission to proceed with a sequential certification of each EIR separately and then request that the Recreation and Parks Commission consider and apply both concurrently. Because the San Francisco Public Utilities Commission is the proponent of the water treatment plant, that may not be possible for the Recreation and Parks Commission to do.

Synthetic Turf

The synthetic turf that is proposed for the soccer fields would have a planned life of only ten years (3rd paragraph, page ES-1 of the DEIR). The tire crumbs in that turf are replete with contaminants and toxics. There is no independent analysis provided in the DEIR for the potential environmental impact the synthetic turf would have on the groundwater underneath the western end of the park.

Because the SFPUC's Water Treatment Plant will also contain a pump that would extract that groundwater to supplement San Francisco's drinking water system without any added treatment and because there should be zero tolerance for any possible toxic contamination of that system, PAR believes an independent third party analysis of the synthetic turf's potential impact on the groundwater should be undertaken in accordance with Environmental Policy 1.4 of the General Plan of the City and County of San Francisco..

The DEIR for the soccer fields does not sufficiently address the safety of the synthetic turf for humans (most importantly, children) who would be playing on it and it does not cite any independent studies on that issue.

The primary source cited in the DEIR is a 2008 report by the San Francisco Recreation and Park Department's Task Force set up to review that issue. The data cited in that report were derived only from a report written by the artificial turf industry. Several healthcare professionals testified at the December 1st public hearing that there are numerous independent studies from impartial sources that are available and that should be consulted and used instead.

01
02
03
04
05

In its comments of March 4th of this year, PAR noted that a study of synthetic turf was undertaken by a unit of the State of California several years ago and its results were published for all public school playing fields in the state about a year ago. If those study results were cited in the DEIR, they could not be located in the limited time provided.

↑
05
cont.

PAR requests that impartial professional sources be used for a proper analysis of all of the environmental impacts associated with the artificial turf being proposed.

Aesthetics

Despite significant alterations that would result in the appearance of the western end of the park from the proposals for the soccer fields, the DEIR concludes that they would not significantly impact its aesthetics. While that may be the opinion of some, it does not take into account the "cumulative effects" of not only the proposals for the soccer fields but also of the proposed water treatment plant that would be adjacent to them.

06

Other Potential Uses of the Soccer Fields

The DEIR assumes that, if the soccer field project proceeds as proposed, soccer and other related athletic events would be the only activities that the Recreation and Parks Commission would permit on them. There is abundant evidence that, if there are significant financial benefits, other nighttime activities (e.g., concerts, etc.) may be permitted because of the fields' permanent lights and stadium seats.

07

The environmental impacts of such events would be substantially different from the activities assumed in the DEIR. As a result, PAR suggests the Recreation and Parks Commission either be requested to prohibit events other than athletic activities or, if it were to consider permitting them, it be required to obtain a supplemental EIR first.

Traffic, Increased Playing Hours

The DEIR proposes to increase playing field time by 9,582 hours by year, bringing the annual total to 14,320 hours, a 200% increase over the current annual playing field time. The only source cited in the DEIR regarding the estimated traffic in western end of the park is an assumption provided by the Recreation and Parks Department for a July 2010 EIR for a different athletic field. We urge that the final EIR recommend the Recreation and Parks Department develop a comprehensive Transportation Demand Management Plan addressing these issues for the western end of the park before this or the adjacent water treatment plant projects are implemented (DEIR Pages IV.D-7-10.).

08

Flora, Fauna, Endangered Species

The analysis in the DEIR regarding the habitat of birds and other wildlife that would be impacted because of the proposed project are inadequate. The DEIR provides at page IV F-23: "The loss of foraging habitat (and prey) for raptors and other birds protected under the California Fish and Game Code, as well as for special-status bats, could be considered significant; however, there are over 200 acres of similar habitat in Golden Gate Park, including the nearby golf course, archery range, and bison paddock." At least that list of "similar habitats" does not include the "preferred alternative site" for the water treatment plant!

09

We suggest the analysis of this issue adhere to the guidelines specified in Objective 8 of the Golden Gate Park Master Plan Flora and Fauna - Ensure the Protection of Plant and Animal Life.

As the Beach Chalet Soccer Fields are located within an Urban Bird Refuge as defined by the City's *Bird-Safe Guidelines*, a lot more study of the noise and light impacts proposed for them is needed for what is presented on pages IV.F-26, 27. of the DEIR

10

CEQA Alternatives

The Selected CEQA Alternatives were not adequately investigated and should be further explored. For example, there is no analysis of the perceived under utilization of the Polo Field for day time soccer or Kezar

11
↓

Stadium for night-time soccer since the Recreation and Parks Department implemented its new, higher hourly fee schedules. Those fee schedules, not limited availability of playing fields, may well be the problem.

11
cont.

Finally, the additions of synthetic turf, the 100 foot stadium lighting and the stadium seating collectively result in an irreversible impact under CEQA to the Beach Chalet Soccer Fields no longer being considered a contributor to the Golden Gate Park National Historic Landmark District (NHLD).

12

Without even mentioning the adjoining water treatment, the DEIR considers the 10.9 acres of the soccer fields to be an "acceptable loss" from the 1,017 acres of parkland. It is PAR's position that no contributor to the Golden Gate National Historic District should be arbitrarily and irreversibly removed from the historic resources for the NHLD. PAR believes such actions could establish a precedent and they should be avoided. (DEIR p. IV C-28, Exemption from Environmental Review p. 2).

Final Comments, Suggestions and A Request

Thank you for opportunity to offer these comments and suggestions and, in advance, thank you for considering them. Please let me know if you have any questions about any of them.

Please provide us (at the addresses below) with both a digital and a hard copy of the next draft of the EIR for the Beach Chalet Soccer Fields when it is published. Despite the suggestions submitted last March regarding the scope of this DEIR, we never did receive either a notice or a copy of it until almost a week after it was published.

Thank you.

Sincerely,

Raymond R. Holland, President
Planning Association for the Richmond (PAR)
5758 Geary Boulevard #356
San Francisco, CA 93121-2112
VM & FAX: (415) 541-5652
Direct&VM: (415) 668-8914
president@sfparr.org or raymondsnf@aol.com

PAR Planning Association for the Richmond

3145 Geary Blvd., # 205 - San Francisco CA 94118-3316
 Voicemail & Fax ~ 415.541.5652 -- Email ~ president@sfpar.org -- www.sfpar.org

December 11, 2009

SF Recreation and Park Commission
 McLaren Lodge, Golden Gate Park
 San Francisco, CA 94117

Re: Beach Chalet Soccer Fields

Dear Recreation and Park Commissioners:

PAR and its members learned of the proposed Beach Chalet Soccer Fields at our October 21st General Membership Meeting. We appreciate the efforts at public outreach by City Fields and RPD and understand the need for increased recreational space to serve members of our community. In general, PAR supports the efforts to address this need. However, many questions regarding the project – the potential toxicity of the artificial turf, the amount of light spill into the surrounding neighborhoods and Ocean Beach, the appropriateness of the increased intensity of use – are not fully answered.

1. Artificial Turf – We believe that the public concern regarding the safety this material is worthy of further study by the Department. We suggest that the Department considers a moratorium on turf conversion until the State of California completes its study. 01
2. Lighting – It is of utmost importance that the Dark Sky environment of Ocean Beach is maintained. All lights should be on motion sensors, and no lights should be left on all night. The added sky glow from the reflection of lights off of the field surface should be taken into account in all lighting level calculations. Lighting levels should not exceed minimum illumination levels set forth by a reputable professional standard. 02
3. Intensity of use – The fields should close at 9pm on Friday and Saturday evenings and at 8pm, at the absolute latest, on all other evenings. 10pm is unacceptable. Maximum decibel guidelines should be set and enforced for amplified sound. 03

PAR requests that the Recreation and Park Department put this project on hold for a period of six months so that questions regarding these issues can be investigated and resolved before proceeding.

Future communication about this issue with PAR should be directed to Robert Fries, incoming chairperson of its Parks and Recreation Committee, or to Raymond Holland, Board President.

Sincerely,

Camille She, Co-Chair
 PAR Parks and Recreation Committee

Cc: Margaret McArthur, Commission Secretary
 Mr. Phil Ginsberg, General Manager
 Jim Lazarus, Commission President
 Eric Mar, District 1 Supervisor

SUGGESTED DRAFT

to: Planning Department
Planning Commission

Dear Mr. Bill Wycko,

The PAR Board has briefly reviewed the Draft EIR (DEIR) for the Beach Chalet Athletic Fields project. We appreciate the resources that have gone into analyzing the impact of this project. However, we have many concerns about the project and about the DEIR.

We are concerned about the proposal to introduce over 7 acres of artificial turf and 150,000 watts of night lighting into our premier landscape Park. While we appreciate the desire to provide more playing time for children, we also feel that the western edge of Golden Gate Park has value as parkland which would be lost if this project were built. Residents of the Richmond District enjoy exploring the natural beauty of the Park and would like to see it preserved as habitat and as parkland, with a variety of uses that everyone can enjoy. With the addition of the Westside Water Treatment Plant, the current project would take this particular section of parkland forever out of the realm of nature and make it a developed, urban area with a limited use. We prefer the alternative of a renovation of the natural grass fields, so that they can be made safer for children to play on, and the use of the current available funding for other playing fields, to provide more room for play for children all over San Francisco.

04

Past requests by PAR for limits to night activity and noise in Golden Gate Park have been ignored. In our letter of December 11, 2009 (copy attached), PAR requested that the Dark Sky environment of Ocean Beach be maintained and that all lights should be on motion sensors, that the fields close at 9 p.m. on Friday and Saturday, and by 8:00 p.m. on all other evenings, and that maximum decibel guidelines be set and enforced for amplified sound. None of these requests have been complied with. With the resultant problems from recent music festivals, these requests are even more important and must be included with an enforcement policy as a requirement for approval of the final EIR.

05

Our preliminary review of the DEIR raises numerous concerns about this project, and the negative environmental impacts it will have on the Richmond District. In view of our overriding concerns and the impossibility of satisfactorily mitigating them we do not believe the project should be approved as proposed. We recommend that the Planning Department consider a renovation to the Beach Chalet Soccer Fields that maintains the current natural environment of the area by, among other suggestions, eliminating the proposed night lighting, reducing the amount of proposed stadium seating, not expanding the size of the parking lot, and not replacing natural turf with synthetic turf.

Our specific concerns include:

- BCAF EIR Public Comment Period should be continued to the release of the Westside Water Treatment Plant DEIR and the Groundwater Project. We are concerned that this EIR has been issued separately from the DEIR for the Westside Water Treatment Plant. We understand that the BCAF DEIR does not judge this cumulative impact to be important; however, we do not see how the cumulative impacts of these projects can be evaluated by the public without the complete information that would be provided by having all DEIR's available at the same time.

(SUMMER/FALL 2012)

06

- Alternatively, Public Comment Period should be extended 30 days. The DEIR is a long document and deserves close scrutiny by the public. Due to the length and complexity of the document, and the release so close to the winter holiday season, and the importance of this project to our membership, PAR asks that the public comment period be extended at least 30 additional days.

(TO 1/12/12)

WILL ASK FOR 60 DAYS EXTENSION

- Aesthetics: Selected viewpoints and lighting simulations are minimal and questionable. View choices seem to be chosen intentionally to avoid the areas of greatest impact of the project. Viewpoint B is too far south and looks north, while the fields are east of this viewpoint. If this view were taken further north, the project and its impacts would be clearly seen under the trees that border the fields. Viewpoint E is located midway up the hill instead of from the top of Sutro Park. Sutro Park is used at night for Dark Sky viewing, contrary to the DEIR statements. There are no simulations from the road that winds up to the Cliff House area. The preliminary environmental studies did have simulations from this location. The road up to the Cliff House is not only a classic SF viewing area but is also on the 49-mile scenic drive. There is no viewpoint from Ocean Beach or the Promenade, looking directly at the fields.

07

We are requesting day and night-time simulations for all of these areas. In addition, the night-time simulations should include all of the various typical weather conditions at BCAF, including but not limited to a low-lying fog as well as the higher marine layer of clouds typical at BCAF, the reflection of the light from the hard surface of the field, and the bounce out to the neighborhood. All night-time simulations must be done with the fields at maximum lighting at night in full darkness, with the time of day and date of the year clearly stated.

- Project Goal: provide a safe environment is not supported with data. There is no statistics-based justification for this goal. If there is a concern with illegal activities that may take place in the western end of the Park, the DEIR should cover the amount and type of activities with statistics to back this up, a comparison to other parts of Golden Gate Park and other parks for the same types of activities, and a comparison to non-park areas, to see if these activities are occurring at such a high rate that it warrants the loss of parkland to development in order to counter this. The DEIR also assumes that lighting will automatically prevent crime; however, studies show that lighting can provide an environment for more crime. Studies on this topic should be carefully researched and included in the DEIR .

08

- Project Goal: bringing people into the Park at night -- No statistical or other justification is given for this project goal. Our experience with the evening concerts is that there is more damage to the park and to the neighborhoods the longer that people are in the park. Nighttime use in the Beach Chalet Athletic Fields area will bring larger crowds into the Park for longer periods of time. Furthermore, the DEIR states that the ground plane in this area is not easily visible from surrounding areas. Any problems with crowds will not be easily visible from surrounding areas, cannot be easily checked by police driving by, nor can problems be reported by surrounding homes, as might happen at an area with higher visibility. Therefore, there is more potential for damage and vandalism to the park and more potential for uncontrolled crowd situations that could spill out into the neighborhoods. We request a study of the impacts on the park and the neighborhood of having more crowds in this area.

09

- Other issues and impacts that should be considered and which need additional time to review. *Conflicts with existing plans and policies, including the Golden Gate Park Master Plan; Impacts on Transportation and Circulation; Impacts on Recreation; Impacts on Biological Resources, including Vegetation, Wildlife, and Special- Status Species; Impacts on Existing Hydrology and Water Quality, and; Impacts related to Hazards, Hazardous Materials.*

- Alternatives : Are poorly developed. We prefer the alternative of a renovation of the natural grass fields, so that it can be made safer for children to play on, and be able to be longer hours but without lighting. This should be combined with renovating other playing fields outside of Golden Gate Park, to provide more room for play for children all over San Francisco. We ask that the DEIR more completely explore this alternative, and we look forward to working with RPD on accomplishing this goal.

10

Thank you for your consideration.

WOODING
MILLER, GREG

- LIGHTS = 60 FEET HIGH
- TREES = 30 FEET HIGH
- PHOTOS ARE INCOMPLETE OR MISLEADING
- SEWAGE TREATMENT ^{11/7/11} SHOULD NOT BE IN PARK

Summary

DEIR for Beach Chalet Athletics Fields Renovation

CUMULATIVE IMPACT NOT MEASURED UNTIL EIR OF WATER TREATMENT

Planning Dept Case No. 2010.0016E
State Clearinghouse No. 2011022005

WEST SUNSET SHOULD BE REMOVED THE "RIGHT PLACE" FOR THIS TYPE OF PROJECT

Project Objectives (Page II-5):

FEE TO RAY W/ LIGHTS WILL (ALSO) BE TOO HIGH, AND UNUSED
REQUEST PUBLIC COMMENT PERIOD TO JANUARY

These are the project objectives as laid out in the DEIR.

1. Increase amount of athletic play time on the Beach Chalet Fields
2. Increase public access to the Beach Chalet Athletic Fields
3. Increase ground sport athletic opportunities on the north side of SF
4. Provide a safe, optimal recreational facility for athletes, spectators and park users
5. Reduce ongoing maintenance and resource needs
6. Comply with ADA requirements
7. Improve safety and increase nighttime use of the west end of GGP
8. Remain consistent with GGP Master Plan

STADIUM = 1600 PEOPLE
PARKING LOTS ONLY BRINGS IN SO MANY MORE FOR CARS

CONCERTS @ NIGHT ?

Major Project Components:

1. Enlarge fields by 6% and replace grass with artificial turf (~7.2 acres) (II-14)
2. Install Field drainage system connected to combined sewage system if water quality does not pass ongoing tests (II-14)
3. Ten 60' tall light standards with a total 150,000 watts of night sports lighting to be operated from sunset to 10PM every day (II-15)
4. 47 additional pedestrian path lights and 13 parking lot standards (II-15)
5. Increase existing parking lot area 35% to 34,060 sq ft (II-15)
6. Renovate existing restroom (II-17)
7. Install a new plaza area and a 775 sq ft playground (II-17)
8. Pave more areas with new concrete pathways 8 to 10 feet wide, running in a rectilinear path around the outside of the field fields
9. Pave the center of the fields with a 30 foot wide concrete path running down the center of the fields (II-17)
10. Spectator seating on N & S ends, on the center concrete area, and in a new plaza for a total of 1,296 seats (II-17)
11. Removal of 16 "trees" and 44 "tall shrubs" (II-21) (these are 30 foot shrubs – i.e. trees)
12. Total project area = 11.2 acres (II-13)

Project is evaluated from the standpoints of these areas:

1. Land use - less than significant impact
2. Aesthetics (lighting, views in and at the site) - less than significant imp
3. Cultural Resources - significant and unavoidable impact
 - a. Fields would no longer contribute to GGP National Historic District
 - b. Loss would **not** substantially alter the character of the entire Historic District (IV.C-28)
 - c. The only area where the report lists a significant impact *"the proposed project would cause a substantial adverse change in the significance of a historic resource as defined in CEQA Guidelines"*.
 - d. SF Ocean Edge quick notes:
 - i. Areas of impact include the spectator seating for over 1,000 people; synthetic turf; and the lighting
 - ii. Trees are still called "shrubs"
 - iii. DEIR says RPD can change the circulation paths to decomposed granite (DG) and make them more curvilinear; but ADA won't accept DG
 - iv. Lighting for paths and parking also - cumulative impact on "wild" area
 - v. Ignores the fields as part of the larger part of GGP;
 - vi. Ignores the cumulative impact of the fields and the water treatment factory -- the two projects together form a barrier that is over 50% of the width of the park; a barrier between the Beach and the Park;
 - vii. Ignores the cumulative loss of trees in the area, and the impact on views and resources -- WWTP will cut down a lot of trees
 - viii. Even one of the items -- lighting - will detract from this area as parkland
4. Transportation and Circulation (street system, transit, bicycles, pedestrians, intersections, parking) - impact and cumulative impact - less than significant
5. Recreation - (nearby rec. facilities - Ocean Beach, trails, bike routes) less than significant
6. Biological Resources: (vegetation, forests, natural communities, wetlands, trees, wildlife, wildlife corridors, fish and game, GGPMP, bird-safe buildings,) - Less than Significant impact with mitigations:
 - a. Not impede migrations and movement of wildlife
 - b. Ambient noise and Lighting - not a hazard for migrating birds, for breeding birds
 - c. Special Status Species: Mitigation = Pre-construction bat surveys (IV.F-25)
 - d. Tree Preservation: Mitigation = One-for-one tree replacement (IV.F-33)
7. Hydrology and Water Quality (stormwater management, groundwater quality, water pollution, drainage systems - hydrology and water quality) less than significant
 - a. Hazards and hazardous materials and Air Quality - Less than Significant with mitigations;
 - i. Release of Haz mats during demolition: Mitigation = pre-demolition survey of restroom(IV.H-32)

Plans and Policies:

DEIR sees no conflicts with existing plans (III-11).

Potential issues raised and dismissed:

SF General Plan

1. Maintenance of urban forest and reforestation of western GGP (III-3)
2. Protection of major views (III-4)

Western Shoreline Area Plan

1. Emphasis of naturalistic qualities of western end of GGP (III-4)

Accountable Planning Initiative - Priority Policies

1. Protection of open space/ access to vistas (III-5)

Climate Action Plan

1. Project impact on Global Warming (Init Study) (III-6)

Golden Gate Park Master Plan

1. Park design character: Ok because project within confines of an existing sports field complex (III-8)
2. Sustainable Landscape Principles : no herbicides, pesticides, fertilizer, and less irrigation water (III-8)
3. Synth Turf and night lighting not available when GGPMP was written (III-9)

Golden Gate National Rec Area Management Policies 2006

1. Minimization of artificial light: light spillover to Ocean Beach would not be significant. (III-10)

Project Alternatives Proposed in DEIR (Section VI):

Alternative 1 - No Project

Alternative 2 - Off Site at West Sunset Playground*

Alternative 3 - Grass Turf, Reduced Night Lighting, removable seats, DG paths

Alternative 4 - Synthetic Turf, No night lighting, DG Paths

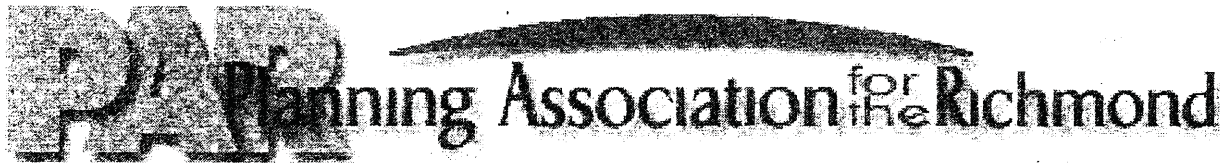
*Environmentally superior alternative

Project Objective	Alt 1	Alt 2 *	Alt 3	Alt 4
1 - Increase Athletic Play at BCF	N	P	P	Y
2 - Increase Access to BCF	N	N	Y	Y
3 - Increase athletics on north side	N	N	Y	Y
4 - Optimal rec facilities	N	P	P	P
5 - Reduce Maintenance/resources	N	P	N	Y
6 - ADA Compliant	N	P	N	N
7 - Improve safety & nighttime use	N	N	Y	N
8 - Consistent w/ GGP Master Plan	Y	Y	Y	Y

Y = Achieves project objective

P = Partially achieves project objective

N = Fails to achieve objective



5758 Geary Boulevard, #356, San Francisco, CA 94121-2112
(415) 541-5652 Voicemails and Facsimiles; (415) 668-8914 Direct and Voicemails
president@sfpur.org or raymondsnf@aol.com

November 22, 2011

Members, San Francisco Planning Commission
C/o Ms. Linda Avery, Secretary (Linda.avery@sfgov.org)
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

In Re: Delay Urged in the Certification of the Draft Environmental Impact Report for the Beach Chalet Soccer Fields Issued on October 26, 2011

Dear Commissioners:

The purpose of this letter is to urge that certification of the draft Environmental Impact Report for the Beach Chalet Soccer Fields Project be delayed until the draft EIR for the San Francisco Public Utilities Commission's Water Treatment Plant has been published and until the DEIRs for both projects in the western end of Golden Gate Park can be considered together.

Even if the proposed soccer fields are initially found to have potential environmental effects on the park that are "individually limited", those effects may be "cumulatively considerable" when viewed in connection with those from the proposed water treatment plant. The publication date of the DEIR for the water treatment plant is unknown.

01

Nevertheless, the SFPUC's "preferred alternative" for the location of its water treatment plant is still the western end of the park adjacent to the soccer fields. Pumps that may be enclosed in the plant would extract water from the aquifer underneath that portion of the park and pump it into San Francisco's pristine Hetch Hetchy Water System without additional treatment.

According to the DEIR for the soccer fields (3rd paragraph, page ES-1), the life span of the artificial turf is only ten years. However, little or no information is provided on how that turf ages or on the potential environmental impacts the plethora of contaminants in it would have on the aquifer beneath it when the turf has to be disrupted for removal and replacement.

02

Thank you for your consideration of this request.

Sincerely,

Raymond R. Holland
President

Cc: John Rahaim, Planning Department

Hiroshi Fukuda
Richmond Community Association 146 18th Avenue San Francisco, CA 94121

December 12, 2011

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

**Subject: DEIR for Beach Chalet Athletic Fields Renovation, Case 2010.0016E,
State Clearinghouse # 2011022005**

Dear Mr. Wycko,

The Richmond Community Association (RCA) believes the DEIR for the Beach Chalet project is incomplete, inadequate, and inaccurate. The public did not have enough time to review and understand the DEIR. The Beach Chalet soccer field project is important for all San Franciscans. Golden Gate Park is one of the most renown public parks in the United States. It was intended for all San Francisco to enjoy as an escape from the dense urban setting. Most San Franciscans do not have adequate open space in their neighborhoods, and they depend on Golden Gate Park for a serene setting for relaxation.

Beach Chalet is located on the western end of the park which the Golden Gate Park Master Plan intended to be kept in a natural state. The eastern end of the park was intended to allow for various attractions i.e. museums, tea garden, botanical garden, etc. The proposed Beach Chalet soccer fields will be a violation of the Golden Gate Park Master Plan and should not be allowed. Converting the natural turf to artificial turf, increasing the parking lot, and installing ten light towers will destroy the natural sylvan setting of the western end of Golden Gate Park. It will replace more than seven acres of natural grass and topsoil with more than seven acres of artificial turf. In addition the project will install ten sixty foot light towers, bleachers, additional parking, cut down 55 trees. The lights will be on every night until 10 PM. We can understand the lights at ATT Park but not in a pastoral setting in the west end of Golden Gate Park.

01

The impact on wildlife habitat will be deleterious. Owls that sleep during the day will be perplexed and the impact on the environment cannot be good. Birds migrating will vary their course and stay away from their customary path. The view from the Sunset and Richmond Districts will be more like the view of ATT Park from the Bay Bridge. The view from Ocean Beach will be forever ruined. The simulations were incomplete and did not realistically provide the view after the installation of the towers. The view from the Cliff House, the ocean, and from the Sunset and Richmond Districts.

02
03

I can understand young soccer players pleading for more soccer fields, but I am not understanding with the light towers, because that is primarily for adults. Youth soccer ends at about 6 PM. The adult leagues will include many non-residents, and this can be seen as another effort to raise income for the Recreation and Park Department. We should not sacrifice parkland when other alternatives are available.

04

There are plans to build a water purifying and pumping station in Golden Gate Park. This is part of a major plan to supply ground water to supplement San Francisco's water supply. Installing artificial turf will have a major negative impact because it will produce chemical run off into the aquifer which has not been fully investigated. The DEIR did not consider the cumulative impact of both the soccer field renovation and the water treatment plant. This is a major flaw, and the State CEQA laws require the consideration of impacts of foreseeable projects.

05

The best Alternative Plan was not considered and needs to be included:

1. Renovate the West Sunset Playground with an improved playing surface and night lighting for some or all of its fields. Benefits: extended playing time year-round for all ages in the evenings. This extends playing time in winter for youth soccer in the late afternoon. Restroom facilities and bleachers already in place and do not have to be built. 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. Install effective subsurface drainage to cut down on loss of play time due to rain. Install state of art irrigation to provide full coverage of the fields and to also save water by irrigating only when needed. Install new sod and gophers 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 Golden Gate Park and consistent with other meadows in the park. Increasing the playing time at Beach Chalet in addition to the increase at West Sunset Playground will greatly benefit youth and adult playing time. Golden Gate Park's parkland will benefit and it will remain consistent with the Golden Gate Park Master Plan and the Secretary of the Interior Guidelines. This will benefit wildlife habitat, preserves existing trees and park windbreak.

06

The Richmond Community Association is opposed to the DEIR for the Beach Chalet project because it is inaccurate, inadequate, and incomplete. Please give serious consideration to the alternative plan outlined above.

Sincerely,

Hiroshi Fukuda, President
Richmond Community Association



Legal Committee, Sierra Club San Francisco Bay Chapter
2530 San Pablo Ave. Suite I
Berkeley, CA 94702-2000
Phone: (510) 848-0800

December 12, 2011

For Delivery By Hand

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

Re: CASE NO. 2010.0016E
Beach Chalet Athletic Fields Renovation, San Francisco Recreation and Parks Department
Comment on Draft Environmental Impact Report

Dear Mr. Wycko,

Attached are the comments of the Sierra Club to the above referenced Draft Environmental Impact Report, submitted for the public record. These comments are being submitted to you as a paper copy and as a PDF file through email.

Although we are disappointed that the Planning Department denied our request to extend the public comment deadline, we have endeavored to be as complete and specific as possible given the allotted time.

We look forward to receiving the Final Environmental Impact Report for this project.

Sincerely,

Norman La Force
Chair, Legal Committee
Sierra Club San Francisco Bay Chapter

Sierra Comments on Draft Environmental Impact Report for Beach Chalet Athletic Fields Renovation CASE NO. 2010.0016E

At a public meeting on December 7, 2009, the San Francisco Planning Department announced that it had granted a "Class 1" exemption to the California Environmental Quality Act (CEQA) for the San Francisco Recreation and Parks Department Beach Chalet project, exempting it from review under the California Environmental Quality Act, Pub. Res. Code §§ 21000 *et seq.*, (CEQA). Several groups wrote letters to the Board of Supervisors appealing the decision.

Although no appeal hearing was held, the Recreation and Parks Department announced in April of 2010 that it had asked the Planning Department to prepare an Environmental Impact Report.

The Planning Department issued a Notice of Preparation of an Environmental Impact Report on February 2, 2011.

On March 4, 2011, the Sierra Club submitted scoping comments, which are attached as Exhibit A.

The Planning Department released the Draft Environmental Impact Report (DEIR) on October 26, 2011, with a comment deadline of December 12, 2012. On November 21, 2011, the Sierra Club wrote to request an extension of the DEIR comment deadline, due to the large number technical issues that needed to be researched and inclusion of the long holiday weekend. The request was not granted. This document comprises the Sierra Club comments, in as complete a manner as possible within the allotted time.

Table of Contents

Executive Summary	4
Lack of Study of Cumulative Impacts of Multiple Adjacent Projects	4
Elimination of Over 10 Acres of Habitat	5
Hydrology and Toxics.....	6
Bioaccumulation	6
Breakdown and aging of synthetic turf	7
Life span and removal	7
Cumulative impacts of multiple projects to water quality and impact on aging of liner.....	7
Cummulative impact over time	8
Contribution to stormwater capacity.....	9
More studies needed for effects of styrene butadiene in stormwater	9
Chemical reactions	9
Flooding.....	10
Bacterial levels.....	10
Contamination of the Pacific Ocean and other areas through groundwater	10
Parks Department ignored independent studies on the effects of synthetic turf when developing standards	11
Failure to identify dangerous substances listed by Proposition 65	12
Other Issues Related to Human Health	13
Impacts of Lighting.....	13
DEIR has significant error in lighting estimation.....	14
Affects of lighting on aesthetics.....	14
Affects of lighting on Biological resources near the project area.....	15
Affects of lighting on Biological resources within the project site.....	16
Other lighting concerns	16
Lack of Significant Investigation of Grass Alternative	16
Lack of Analysis of Effects of Global Warming and Climate Change	16
Impact of rising sea level on the project	17
Impact of the project on global climate change	17
Parking and Lack of Compliance with Proposition J.....	18
Impact on Historical Resources	18

Executive Summary

The Sierra Club has long supported recreational use of parks and open space. The Sierra Club has specifically advocated for the creation of new soccer fields in San Francisco.

However, it is worth noting that the Notice of Preparation for this project refers to the site as the "Beach Chalet Athletic Facility." This is an incorrect characterization, since the site, as defined by the Golden Gate Park Master Plan and the City and County of San Francisco General Plan, is not an "athletic facility." It is a meadow in "naturalistic" area that can be used for multiple recreational athletic and non-athletic activities, including soccer, frisbee, picnicking, hiking, and bird watching.

01

The Sierra Club supports the use of park meadows for sports-related activities. However, the proposed project is a major change of use for the area: the conversion of a multi-use meadow to a dedicated athletic facility that would deny public access for other recreational uses, and which would completely replace than nine acres of habit synthetic turf. It would brightly light an area that is current dark and naturalistic.

It must be emphasized that the project site is not isolated in an urban, neighborhood park, but is part of a large open space area of naturalistic parkland that includes the western end of Golden Gate Park, federal lands, and other protected city land. The site adjacent to, or in the immediate vicinity of, a number of sensitive natural resources, including the Golden Gate Natural Recreation Area, the Balboa Natural Area, and Sutro Heights Park. It is also within 500 feet of the Pacific Ocean.

02

Given the size of the project, the dramatic conversion of land in the middle of natural resources, the dramatic change of use, and the introduction of acres of known Proposition 65 substances into this environment, substantive and careful analysis is required by CEQA.

Unfortunately, the DEIR does not disclose all of the environment impacts, including many that could be significant and would require mitigation. The document also contains some contradictory statements and at least one significant error that require revisiting the analysis. The proposed project is also at odds with one provision in San Francisco Code, which, when brought up to code, would require a recalculation of impacts.

Additional analysis is required for the Final EIR. This document points out some of these.

Lack of Study of Cumulative Impacts of Multiple Adjacent Projects

The DEIR incorrectly states that there are no cumulative impacts. The proposed Beach Chalet field protect is directly adjacent to another proposed large-scale project within Golden Gate Park, the San Francisco Westside Recycled Water Project (Case No. 2008.0091E). The Water project will take up several acres, will construct a large structure, add large pipelines, and install up fencing. Both projects are by the City and County of San Francisco.

03

The potential environmental impact of the Water project is significant enough that the Planning Department has issued a Notice of Preparation for an EIR for this project on

04

September 8, 2010. The Water project, like the adjacent Beach Chalet project is not consistent with the Golden Gate Park Master Plan and the San Francisco General Plan.

↑
4
cont.

The Beach Chalet DEIR fails to consider the cumulative impact of both projects in this on the park and the surrounding natural resources that make up a single large area. These include the Golden Gate Natural Recreation Area, the Balboa Natural Area, and Sutro Heights Park, and the Pacific Ocean.

—
05

Table IV-1 in the DEIR lists the Water project as a cumulative factor, and even states that there are “long-term impacts on Hydrology and Water Quality through 2018.” But the DEIR doesn’t state what those are or offer mitigations.

The DEIR omits several facts about the Water project. For instance, the DEIR omits from consideration the fact that the Water project will remove 120 trees, according to the map produced by the San Francisco Public Utilities Commission (the project sponsor) in its 2010 Tree Report. (See Exhibit B.)

—
06

Coyotes, which are known to frequent the park, as has been reported in newspapers, are not mentioned anywhere in the DEIR.

—
07

In other places, the DEIR does not mention the Water project at all under cumulative impacts. For instance, page IV.B-35 says:

Impact C-AE: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the site vicinity, would not have a cumulatively considerable contribution to impacts related to aesthetics.

Page IV.B-35 describes several other more minor and more distant project as having no visual impacts, but neglects to mention the Water project. Page IV.B-35 then incorrectly states that “**No other projects in sufficiently close proximity to the project site are reasonably foreseeable**, such that cumulative effects related to visual character, urban design, view corridors, or scenic views, or light and glare would be anticipated.” As Exhibit B shows, the Water project is directly adjacent to the proposed Beach Chalet project site. The clearing of trees and tall “shrubs” (up to 30-foot tall) would certainly have at least a visual impact on the western end of Golden Gate Park, and would be a cumulative loss of habitat birds, insects, and other wildlife.

—
08

A programmatic EIR to analyze the cumulative affects of the project is warranted by CEQA.

—
09

Elimination of Over 10 Acres of Habitat

The DEIR accurately states that the “current parking lot is paved and provides little habitat for wildlife” (Page IV.F-4). But the DEIR does not recognize that replacing a meadow with synthetic turf is the equivalent of paving 9 acres of habitat. The topsoil is removed, replaced with foot of gravel and a plastic surface. As with a paved surface, temperatures above the synthetic turf surface can rise to much higher levels than habitat. Within this 9-acre area there no longer are plants to support insects, or insects to support birds and ground life.

—
10
↓

The removal of trees and tall (30-foot) shrubs, and the construction of related facilities and expansion of the parking lot bring the loss of habitat to over ten acres.

For example, page IV.F-23 states:

The loss of foraging habitat (and prey) for raptors and other birds protected under the California Fish and Game Code, as well as for special-status bats, could be considered significant; however, there are over 200 acres of similar habitat in Golden Gate Park, including the nearby golf course, archery range, and bison paddock.

There are several problems with this statement. As mentioned before, the project site is centrally located between open space in Golden Gate National Recreation Area, the cliff areas of the Balboa Natural Area and Sutro Heights Park and the Pacific Ocean. Removing the project site habitat would create a donut hole. Also, The bison paddock is not a meadow, but is most compacted soil with little-to-no plantlife, and should not be counted as foraging habitat.

Some species known to inhabit Golden Gate Park and surrounding parkland, including California quail and coyote, are simply not mentioned in the DEIR, and the impact of the project is not discussed.

10
cont.

Hydrology and Toxics

The hydrology sections of the report state the possible levels of pollutants from the synthetic turf based on various studies in the U.S. and San Francisco. Although there do exist studies that indicate levels of pollutants *above* U. S. and California standards (Page IV G-5 or 224), the DEIR focuses on the studies that indicate various levels of pollutants (chemicals, metals and volatile compounds) that are *below* California Maximum Contaminant Levels (MCL) or not detected. It unjustifiably downplays some contaminants that are above MCL, such as zinc.

The DEIR incorrectly claims no significant impact to water quality of runoff and groundwater, nor cumulative impacts (which focus on runoff to the system, rather than pollutants to water quality). In fact, there is a possibility of increased levels of pollutants above standards based on the fact that the composition of the tire crumb varies in the infill as a result of the manufacturing process.

As described in this section, there exist the possibility of significant impacts that are not studied or analyzed.

11
12

Bioaccumulation

The effects of bioaccumulation in organisms, as defined by the United States Environmental Protection Agency, are not analyzed. Bioaccumulation refers to the accumulation of substances, such as pesticides, or other chemicals in an organism. The term does not appear in the DEIR.

There are a number of places in the DEIR where bioaccumulation is relevant but not considered. For instance page IV.G-27 (Pg 246) states:

13

“If sampling by the SFRPD indicates that water quality is acceptable, SFPUC could allow drainage from synthetic field to infiltrate into the groundwater basin. Because the SFRPD would not allow leachate or runoff from the fields to infiltrate to the groundwater until sampling data indicate that the quality is acceptable, impacts related to degradation of groundwater quality would be less than significant.”

13
cont.

What is acceptable can still contribute to bioaccumulation and the cumulative impact over time. The pollutants are there even in low levels.

Breakdown and aging of synthetic turf

Synthetic turf manufacturers state that the lifespan of such a field is from 10-to-12 years. Over that time, the field breaks down until it becomes unusable.

The DEIR does not disclose the wear and tear of 360 people per day using a field of 312,000 square feet of synthetic turf. As this usage wears down the turf, particles will break off into the soil and water. Sunlight and heat also break down synthetic turf. These effects are completely missing from the DEIR and needs to be analyzed.

The DEIR also does not analyze the impacts under various weather and age conditions. It also does not state have often the cited studies that it cites conducted.

Dust is also created as the synthetic turf ages, as noted by the California Attorney General's office. In 2008, the California Attorney General, the City of Los Angeles, and Solano County sued three manufacturers of synthetic turf, accusing the manufacturers of violating California's Proposition 65 by knowingly failing to disclose that their products contain lead. The defendants were Beaulieu Group, AstroTurf, and FieldTurf USA Inc., the vendor that the Recreation and Parks Department plans to use for the proposed project.

14

Deputy Attorney Gen. Dennis Ragen, the state's lead attorney on the lawsuit, was quoted in the LA Times:

"As it ages, it forms more dust," he said, and could contain levels of lead that are more than 20 times what's allowed by Proposition 65.

(September 04, 2008, <http://articles.latimes.com/2008/sep/04/business/fi-turf4>)

The dust analysis mentioned on page IV.H-18 was performed on relatively new fields. It does not consider any data on aged fields that the Attorney General had.

Life span and removal

The life span of synthetic turf fields is only 10-to-12 years, when it breaks down to such a degree that it becomes unusable. When this happens, the synthetic turf needs to be removed and disposed of, typically in a hazardous waste landfill facility.

15

The DEIR does not consider the impacts of the process of removal and disposal process.

Cumulative impacts of multiple projects to water quality and impact on aging of liner

Cumulative impacts to water quality are not adequately discussed regarding the pollutants in the water quality in two ways. First, the DEIR limits the analysis to runoff load to the

16

sewage system, as described on page IV.G-28 (page 248 in the PDF file). It does not describe the effects of runoff into the park (as with flooding) or other places.

Second, the DEIR states that multiple "cumulative impacts related to degradation of water quality are potentially significant," but states that these are not significant because of the use of a liner. However, there is no discussion of the aging of the liner. The proposed lining will age and is affected by the surrounding environment, weather, and animals. It will wear and is likely to leak. These impacts are not discussed or analyzed.

Page IV.G-28 states these impacts:

...the composition of tire crumb is dependent on the tires used in the manufacturing process and can be variable. Therefore, the quality of stormwater runoff and leachate from the proposed synthetic playfields is unknown and could contain pollutants that could degrade groundwater quality if infiltrated to the Westside Groundwater Basin. Several of the projects listed in Table IV-1 could also provide additional sources of polluted runoff. Further, the San Francisco Groundwater Supply Project would involve conversion of the existing South Windmill Deepwell (located approximately 190 feet south of the proposed playfields) to use as a municipal supply well. **Therefore, cumulative impacts related to degradation of water quality are potentially significant.**

16
cont.

The next paragraph states that the liner prevents these from being significant. But when the liner ages and leaks, these cumulative impacts become significant. The DEIR does not analyze or mitigate these significant effects.

Finally, the proposed project would allow infiltration to groundwater if levels are acceptable. However, low levels of pollutants still add to the cumulative impact, which is not discussed. This is an omission in the DEIR.

Cummulative impact over time

TABLE IV.G-1, Page IV.G-7 (pg 226) describes low levels of toxic materials:

"it is unlikely that leachate from tire shreds used in outdoor applications, such as playground surfaces, would yield such concentrated leachate with high enough concentrations to cause adverse effects. When installations of playfields are above the water table, risks to groundwater quality are low."

"The samples exhibited slight acute and chronic toxicity at 15 days after installation, but none of the samples showed toxicity 3 months after installation."

"Laboratory leaching methods indicated the potential for release of zinc, aniline, phenol, and benzothiazole from synthetic turf installations. However, laboratory leaching procedures are more aggressive than would occur due to rainfall, and these results are not necessarily representative of potential leachate quality from a synthetic turf installation.

· Zinc, chromium, copper, lead, and nickel were detected in one stormwater runoff sample. However, the concentrations were below New York surface water standards.

· Semivolatile organic compounds were not detected in groundwater samples collected down gradient of four synthetic turf installations"

17

The studies vary as to level indicators: below levels or above. For instances, Pages IV.G-16 and -17 (pgs 235 -236) of the DEIR state that zinc is higher than the California Maximum

Contaminant Levels (MCL) based on the SFRPD developed synthetic turf standards in 2009 Chromium & Lead are equal to the MCL.

The DEIR does not state if there is a cumulative impact of introducing even low levels chemicals and metals over the 10-12 lifespan of the synthetic turf fields, or whether there is bioaccumulation.

17
cont.

Contribution to stormwater capacity

Currently, stormwater at the site infiltrates to groundwater, the Westside Groundwater Basin Within San Francisco. The basin includes three aquifers known as the Shallow Aquifer, Primary Production Aquifer, and Deep Aquifer.

Page IV.G-3 states that the new 9 acres of synthetic turf athletic fields will connect to the City’s combined stormwater runoff/sewage pipe system, instead of going into the groundwater.

Pages IV.G-1 and -2 states wastewater treatment capacity, but doesn’t state how this project will contribute to the capacity.

18

More studies needed for effects of styrene butadiene in stormwater

The DEIR PDF pages 230-235 discuss the San Francisco Park studies of synthetic turf. The results showed low levels of chemicals and metals and volatile compounds not detected. However it also said on page IV.G-16 (PDF page 235):

These sampling results are representative of the stormwater runoff quality from the Garfield Square Park and the South Sunset Playground. **However, the composition of the styrene butadiene rubber infill material used in synthetic turf can vary widely** because of the variable composition of the tires used to manufacture the infill material. Therefore, for other fields, **it would be necessary to conduct additional sampling** to assess stormwater runoff quality specific to that installation, and future studies should also evaluate background metals concentrations in runoff from grass fields to evaluate the contribution of metals due to the synthetic turf materials.

19

These addition studies were not conducted for this DEIR, and still have not been conducted. While it is laudable that the DEIR identifies this shortfall, the studies should be conducted and the results published in the Final EIR.

Chemical reactions

There is no analysis of whether there is any possibility of chemical reactions between turf pollutants in water or soil with existing chemicals or metals, or even whether or not other chemicals exist. In fact, other chemicals, not mentioned in the DEIR, are known to leach out of or outgas from synthetic turf. (See the section “Failure to identify dangerous substances listed by Proposition 65” later in this document.)

The DEIR lacks the application the Precautionary Principle, which is necessary because the level of pollutants varies and there is a possibility of levels above accepted standards. If the possibility of leachate exists and has existed, the DEIR should justify (but does not justify)

20

moving forward with the use of synthetic turf in the project. This DEIR Hydrology section is focused on all the reasons to use synthetic turf rather than natural alternatives.

↑
20
cont.

Flooding

Page IV G-6 admits, "The Department should not install synthetic turf fields in areas of parks that are prone to flooding." However, the project site includes areas that frequently flood or are continually saturated. An area prone to flooding, and one that is frequently saturated, is located here:

37 deg. 45 ' 58.24" N

122 deg. 30 ' 32.88" W

Exhibit C offers a photograph of this area.

This issue of flooding, stormwater runoff, and sea level rise are linked.

↑
21

Bacterial levels

Although the DEIR describes bacterial concentrations related to the Southwest Ocean Outfall (SWOO) of existing conditions, it does not describe the impacts for the proposed project. Page IV G-3 states:

Biological parameters and sediment pollutant concentrations at the SWOO discharge area have generally been the same or essentially the same as at reference stations. Bacterial concentrations may increase to levels above water quality standards in the vicinity of the combined sewer overflows.⁷ When overflows occur, signs must be posted on beaches in the vicinity of the CSO until the bacteria level drops below the single sample minimum protective bacteriological standards contained in the California Department of Health Services regulations for public beaches and ocean water contact sports. Although bacterial concentrations are a concern, they do not currently result in a violation of either of the CCSF wastewater NPDES permits.

The DEIR only meets CEQA part way. An analysis of the impact of synthetic turf is required.

↑
22

Contamination of the Pacific Ocean and other areas through groundwater

The DEIR does not include an analysis of potential contamination of the ocean.

Page IV G-4 states that other sites, such as the San Francisco Zoo, use the groundwater of the proposed project:

Within San Francisco, groundwater from the Westside Groundwater Basin is primarily used for irrigation at Golden Gate Park, the Edgewood Development Center, and three golf courses located in the vicinity of Lake Merced. Groundwater is also used for San Francisco Zoo operations and to maintain lake levels in Golden Gate Park and Pine Lake. The production well located nearest to the project site is the South Windmill Deepwell, approximately 190 feet to the southeast of the proposed playfields.

↑
23
↓

However, the state whether or not toxins and bacteria from turf material will leach into groundwater and spread through irrigation. This needs to be analyzed.

Furthermore, the DEIR states that groundwater flows to the Pacific Ocean, but does not mention the impacts of this state:

...depth to groundwater in the vicinity of the project area was between 25 and 27 feet below ground surface in October 2009 when groundwater levels were at a seasonal low.⁹ Based on a hydrograph of groundwater levels in the USGS South Windmill monitoring well MW-57 between 2006 and 2009, shallow groundwater levels in the area fluctuate 6 to 8 feet seasonally, and therefore groundwater levels could rise 6 to 8 feet during the wet season. The groundwater flow direction in this portion of the North Westside Groundwater Basin is to the west, towards the Pacific Ocean.”

23
cont.

The DEIR does not state the depth levels and flow to the Ocean, nor does it look at the speed of travel and level of accumulation of synthetic turf toxins and bacteria. This is required to determine the environmental impact on the ocean.

Parks Department ignored independent studies on the effects of synthetic turf when developing standards

The DEIR states that the San Francisco Recreation and Parks Department Commission (Commission) established a Task Force to review existing research on synthetic playfields in March 2008. The Task Force results were used to develop synthetic turf standards for the Department. The DEIR says that the Task Force refers to a single study in the state of Washington, upon which it recommended moving forward with using synthetic turf at various sites, including at the Beach Chalet.

Regarding “Ecosystem,” Page IV.G-5 states:

The Commission approved the recommendations of the Task Force on October 2, 2008...The study group evaluating the effects of synthetic turf on the ecosystem **did not find independent studies** that specifically addressed this topic. However, they found one study commissioned by the King County Water and Land Resources Division in Seattle that looked at the quality of stormwater runoff from synthetic turf. According to the task force report, the researchers found that the runoff had no effect on test organisms, and met all state and federal water quality standards.

24

First, it is questionable whether this lone study is enough to base a decision on the use of synthetic turf throughout the park system.

Further, the statement that the Task Force for could not find any “independent studies that specifically addressed this topic” speaks to the inadequacy of the Task Force, since there certainly exist a number of studies on this topic. For instance, there’s the work of the Connecticut Department of Environmental Protection, which the DEIR references. There have also been published other EIRs from different California agencies (for instance, Moraga Canyon Sports Fields Project, Piedmont, California, State Clearinghouse Number: 2009112054). The DEIR bases some of its conclusions on the work of the Task Force, which is clearly inadequate.

Second, the DEIR provides no information on the study referred to by the Task Force. It does not quote the study. Nor does the DEIR provide a title or other reference that would enable the public to locate this study.

There are a number of unanswered questions that the public requires in order to be informed of the impact of the project. For instance:

- When was the study conducted?
- Was the study adequate?
- Was the water quality tested under different weather conditions at different times of the day, and multiple times, such as on sunny days, during the hottest time of the day or during high rains?
- Sun affects material and rates of leaching. Was the study done at different ages and conditions of the artificial turf, such as when the turf is worn, it may leach more and turf particles may detach more frequently?

The DEIR offers not information about the referred to study that the Task Force used to develop standards.

24
cont.

Failure to identify dangerous substances listed by Proposition 65

Independent studies have should that artificial turf fields contain other dangerous chemicals, including carcinogens. The DEIR fails to identify many of them. Nor does it indicate that there was any attempt to identify them. Many of these substances were identified in studies done by the Connecticut Department of Environment.

http://www.ct.gov/dep/cwp/view.asp?a=2690&Q=463624&depNav_GID=1511

The DEIR references some of these studies, but not many of the chemicals identified in them.

One report, funded by the State of Connecticut, is entitled *2009 Study of Crumb Rubber Derived from Recycled Tires, (Revised 5/4/10)* by the Department of Analytical Chemistry, Connecticut Agricultural Experiment Station. It found chemicals leached by aqueous solution and offgassing.

This table is from the this report:

Table 1. Compounds Volatilizing from Crumb Rubber Samples Analyzed at CAES

Compound Name	Abbreviation
1 1-methylnaphthalene (PAH)	1-MeNaph
2 2-methylnaphthalene (PAH)	2-MeNaph
3 4-t-(octyl)-phenol	4-t-OP
4 Benzothiazole	BT
5 butylated hydroxytoluene	BHT
6 naphthalene (PAH)	Naph
7 butylated hydroxyanisole	BHA
8 fluoranthene (PAH)*	Flu
9 hexadecane*	Hex
10 phenanthrene (PAH)*	Phen
11 pyrene (PAH)*	Pyr

25

*Identified but not quantified.

The DEIR does discuss benzothiazole, but not the others.

Butylated hydroxyanisole is a recognized carcinogen, suspected endocrine toxicant, gastrointestinal toxicant, immunotoxicant, neurotoxicant, skin and sense-organ toxicant. n-hexadecane is a severe irritant based on human and animal studies. 4-(t-octyl) phenol is corrosive and destructive to mucous membranes.

By failing to identify these and other Proposition 65-listed chemicals, the DEIR fails to determine the impact of these chemicals on the environment, or the accumulative impact of additional chemicals. What is the affect if any of chemical rxns of additional toxins from the turf into the soil and water?

We also don't know if the leachate is treatable in the city's treatment system for runoff. For instance, it can't treat the soil and groundwater for the leachate.

The DEIR also doesn't discuss any potential toxins from the lining.

↑
25
cont.

Other Issues Related to Human Health

The DEIR contains no analysis of latex allergies in field users.

There is no analysis of mechanical injuries specific to artificial turf despite numerous published studies, include one by the National Football League, which reported a higher level of injuries on synthetic turf than with natural turf.

The DEIR presents no examination of the possible synergistic effects of high temperatures that synthetic fields experience.

The DEIR discounts any possible crumb rubber ingestion effects without justifying this position.

26

Impacts of Lighting

The DEIR findings, described in Impact AE-3 and Impact BI-2, that there are no significant impacts to adding 150,000 watts of lighting, is not substantiated by evidence. The DEIR lacks the analysis to make this determination. This is true for the impact of lighting on both aesthetics and biological resources.

The DEIR also does not consider the 9-acres of brightly lit fields as a source of light.

Importantly, the DEIR supplies no quantitative data or calculations that would judge the amount of light intensity seen by observers at various distances. The DEIR simply offers statements, some of which are contrary to established evidence and experience at other locations in San Francisco.

27

DEIR has significant error in lighting estimation

The DEIR presents inaccurate information, and a dramatic underestimation of the brightness of the lights to be used. Page IVb-33 states:

The proposed project would use the same type of lighting standards (Musco brand) as already employed at the Crocker Amazon site during evening games. The light standards are capped units that emit **134 lumens per lamp**, and have been designed specifically for sports fields, with the goal of lighting the field evenly while minimizing the spread of light upward.

28

However, the project also proposes that the lamps to be used will be 1500 watts each, which emit 134,000 lumens. The DEIR analysis of the impacts of lighting is off by a factor of 1000, and needs to be revisited.

Affects of lighting on aesthetics

The DEIR incorrectly states that there is no impact of lighting on aesthetics, and does not take into account nearby cultural resources and tourist sites, including the Cliff House, Sutro Heights Park, and the Balboa Natural Area, all located upon hills less than three quarters of a mile away.

Table ES-1 (page ES-9) states:

Impact AE-3: Development of the proposed project would not create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area or that would substantially affect other people or properties.

The 150,000 watts of lights on 60-foot poles and on the ground, as well as the light reflected off of 9-acres of brightly lit fields would be a substantial new source of light, visible from within the park and the surrounding natural areas frequented by tourists and residents. This western quarter of Golden Gate Park is, by design, a relatively dark area, required to be “naturalistic” according to the Golden Gate Park Master Plan. Similarly, the adjacent Golden Gate National Recreation Area is preserved as a natural area. The amount of lighting would substantially affect other people and property.

29

Within the National Park Service boundary, and near the site, is the Cliff House, a popular area for tourists and residents located on a hill and known for its views. The National Park Service describes the Cliff House:

For almost one hundred and fifty years, visitors have traveled to the Cliff House at the westernmost tip of San Francisco's coastline to **experience the magnificent natural setting** and to enjoy entertainment and seaside recreation.

(<http://www.nps.gov/goga/clho.htm>)

The lights and the 9-acres of brightly lit fields would be a major detraction to views from the Cliff House after sunset. The Cliff House is open to the public at night.

Even closer to the project site are the Balboa Natural Area (approximately 2500 feet from the project site) and Sutro Heights Park, which are both elevated on hills. Sutro Heights Park is a popular location for residents and tourists and is commonly used to view sunsets—a time when the lights will be on.

The San Francisco Chronicle referred to Sutro Heights Park as “a dramatic bluff overlooking the Pacific Ocean.” (January 21, 2010, http://articles.sfgate.com/2010-01-21/entertainment/17834545_1_statues-path-water-tanks)

↑
29
cont.

Affects of lighting on Biological resources near the project area

Table ES-11 of the DEIR states:

Impact BI-2: Implementation of the proposed project would not interfere substantially with the movement of native resident wildlife species and with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

↓
30

The table states that the project will “Fully shield all lights to prevent upward and outward light spill beyond the needed illumination area.”

There are several problems with this statement. For one, significant outward light spill exists in every other similar installation in San Francisco. There is no logical reason to believe that this project could be significantly different.

Secondly, the DEIR contains no analysis of the effects of lighting in fog. In place of data is a statement (page IV.B-34), “Specifically, under foggy conditions, the lighting would be more diffused and would likely be more visible higher up in the sky and from vantage points further away.”

↓
31

The evidence of other facilities in San Francisco shows just the opposite: the lights and the brightly lit fields provide a large, lit volume of fog that is visible from large distances, impacting the wildlife on the ground surrounding the site and in the air.

Also, overhead shields do not prevent upward light spill in fog, a condition that is common at the project site on the coast. Fog reflects light in all directions, including upward and outward, which will impact wildlife.

The project site is adjacent to the Golden Gate National Recreation Area, which the federal government preserves as a natural area, and which includes an extensive habitat restoration area.

↓
32

The DEIR on page III-10 quotes Golden Gate National Recreation Area Management Policies 2006, stating that the federal government will “seek the cooperation of park visitors, neighbors, and local government agencies to **prevent or minimize** the intrusion of artificial light into the night scene of the ecosystems of parks.”

However, the proposed lighting will be set at 60-feet in the air. There are no buildings or trees of that height between the proposed lighting and the Golden Gate National Recreation Area, nor is there likely to be.

Western snowy plover, a threatened species, are known to nest in the area across the street (the Great Highway) from the project site. The DEIR says that the 60-foot-tall lighting will be focused on the fields. However, similar night lighting of fields in San Francisco are quite visible, and bright, not only from across the street, but from several blocks away. The DEIR does not provide an analysis of the effect of lighting on the snowy plover nesting or feeding habits.

↓
33
↓

The DEIR does not mention the effect of 9 acres of brightly lit, green synthetic turf as a source of light. However, a look at other similar facilities in San Francisco shows that it is such a source that will be seen from the surrounding hills, including the Balboa Natural Area.

↑
33
↓

Affects of lighting on Biological resources within the project site

Most of the intensity of the lighting will point downwards from up above, into the wooded habitat surrounding the project site within Golden Gate Park. Page IV.B-34 states, "the proposed lighting is unlikely to spill over the site's boundaries substantially enough to adversely affect the surrounding neighborhoods."

↑
34
↓

This is a questionable statement, as described earlier, but the light certainly will not stop at the fence surrounding the 10-acre site. There will be impacts on wildlife, such as nesting birds, outside of the fence on the ground and in trees below 60 feet, which are most of the trees.

Other lighting concerns

For more detailed comments on the lack of analysis of lighting in the DEIR, the Sierra Club refers the Planning Department to the expert testimony submitted to Mr. Bill Wycko of the Planning Department by Lumineux Consult. This document is titled "Expert comments on the Draft Environmental Impact Report for the Beach Chalet Athletic fields renovation," dated December 10, 2011.

↑
35
↓

(Lumineux Consult www.lumineux-consult.com, info@lumineux-consult.com)

Lack of Significant Investigation of Grass Alternative

The Sierra Club believes that greater investigation of natural grass solutions should have been made in drafting the DEIR, and suggests that this be done in the Final EIR. Natural grass does not have the environmental impacts of on hydrology, habitat, user safety, and many other issues described in this document. Natural grass would be significantly less costly to build and maintain, and would not require complete replacement and hazardous waste disposal in ten years.

↑
36
↓

There are number of ways the existing fields could be improved using modern methods such as those used on professional natural turf fields, including better drainage options, use of underground spaced blocks or netting to prevent gophers, and maintenance.

Lack of Analysis of Effects of Global Warming and Climate Change

The DEIR fails to analyze the impact of sea level rise on the project, and fails to analyze the impact of the project on global climate change.

↑
37
↓

Impact of rising sea level on the project

The DEIR fails to analyze the impact of sea level rise due to climate change on the project. This is required because project site is adjacent to the ocean. Higher sea levels and higher tides will change the hydrology of the area, including the chemical makeup of ground water, the frequency of flooding, and increased likelihood of ocean contamination from the synthetic turf, as well as other possible hydrological effects.

Sea level rise has been recognized as fact by government agencies. For instance, the San Francisco Bay Conservation and Development Commission (BCDC) has issued a climate change proposal that recognizes that sea level rise is occurring. In April 2009, BCDC released report summarizing current scientific research on climate change and examining possible impacts on the Bay of sea level rising 16 to 55 inches. In the fall of 2010 proposed amendments to its update its San Francisco Bay Plan based on sea level rise findings added a new section on climate change policy.

37
cont.

Impact of the project on global climate change

The DEIR also fails to analyze the environmental impact of the project on global climate change. California courts have recognized that CEQA requires this analysis. For instance, in *Center for Biological Diversity et al. v. City of Desert Hot Springs, et al.*, No. RIC 464585 (Riverside County Sup. Ct., Aug. 6, 2008), the court invalidated an EIR for failure to make a meaningful attempt to analyze a project's effects on global climate change.

The effects of synthetic turf on global climate change have been quantified, and appropriate mitigation measures have been identified. For instance, this was done in a paper entitled *Estimating the Required Global Warming Offsets to Achieve a Carbon Neutral Synthetic Field Turf System Installation* by the Athena Sustainable Materials Institute of Merrickville, Ontario, a non-partisan non-profit research collaborative. (<http://www.athenasmi.org>) To quote from the introduction:

The purpose of the study was to estimate of the greenhouse gases emitted during the life cycle of the synthetic turf system as opposed to a natural grass surface. The study also determined the number of trees to be planted to achieve a 10-year carbon neutral synthetic turf installation.

The results identified a mitigation for a synthetic turf field would be the planting of 1861 trees. From the Results section:

As per U.S. DOE, 1998, a medium growth coniferous tree, planted in an urban setting and allowed to grow for 10 years, sequesters 23.2 lbs of carbon, equivalent to 0.039 metric tonnes CO₂. The tree planting offset requirements to achieve a 10-year carbon neutral synthetic turf installation is estimated to be 1861 trees (±23%).

The EIR for the Beach Chalet projects needs such an analysis, and appropriate mitigation must be proposed. Furthermore, the project may also require an EIR to determine the cumulative impact on global climate change of the Recreation and Parks Departments' program of replacing multiple grass fields through the city with synthetic turf.

38

Parking and Lack of Compliance with Proposition J

The proposed project would add 20 parking spaces in order to accommodate expected increased use of the site. However, the addition of 20 parking spaces is not permitted by Proposition J, passed by voters in 1998 (amended by voters Proposition G in 2005), as codified by Appendix 41 to the San Francisco Code. Proposition J/Appendix 41 restricts the total amount of street parking in Golden Gate Park.

Because the project's 20 spaces cannot be added without going back to the voters, further assessment of the impact of traffic in the area is required.

Proposition J/Appendix 41 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.**

39

Proposition J was a compromise between different community elements that supported a new underground parking facility in Golden Gate Park, and those that opposed it. The intent of Proposition J was to insure that in trade for the creation of 800 new spaces underground, parking would not be added to Golden Gate Park, either at the time of construction or later. This is indicated by the phrase "permanently eliminated" in the code. The code clearly states that this applies "as of the effective date" and does not list an expiration date for the code.

Therefore, the project cannot add 20 new parking spaces, and the impacts to the increased use of the project need to be re-evaluated.

The DEIR also does not account for the additional spectators in the total additional driving. There are over 1,000 seats for spectators, which translates to over 300 extra cars, arriving and departing until 10pm. If the Planning Department believes these spectators will use Muni, it does not provide for resources for extra service.

40

Impact on Historical Resources

The Sierra Club supports historical resources in San Francisco, including those located in parks. The existing historic design of the park has traditionally had the use as passive and

41

informal, with naturalistic setting and open space. The proposed project would completely destroy 10 acres of this historic resource.

Page IV.C-20 of the DEIR states:

Impact CP-1: The proposed project would cause a substantial adverse change in the significance of a historic resource as defined in CEQA Guidelines Section 15064.5, including those resources listed in Article 10 or Article 11 of the San Francisco Planning Code. (Significant and Unavoidable)

The proposed project is a radical change in use from current conditions and what is in the Golden Gate Park Master Plan and the San Francisco General Plan. It is difficult to mitigate for this loss.

The San Francisco Historic Preservation Commission, in its December 1, 2011 letter to Mr. Bill Wycko of the Planning Department, said this of the DEIR:

The HPC believes the best preservation alternative is a combination of parts of preservation alternative no. 2, 3, and 4, which is to improve the soccer fields at Beach Chalet as well as to seek an off-site alternative. The proposed off site alternative holds real potential when considered in a larger context of fields in this part of the city.

↑
41
cont.

Exhibit A

Sierra Club Scoping Comments for Environmental Review of Beach Chalet Athletic Fields
Renovation, Case No. 2010.0016E



Sierra Club, San Francisco Bay Chapter
 85 Second Street
 San Francisco, CA

March 4, 2011

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

Subject: Case No. 2010.0016E Beach Chalet Athletic Fields Renovation, Scoping for
 Environmental review

Dear Mr. Wycko,

Thank you for the opportunity to provide scoping comments for the Environmental Review of the proposed soccer sports complex construction project at the Beach Chalet in Golden Gate Park. This letter comprises the scoping comments of the Sierra Club.

The proposed conversion of the meadows near the Beach Chalet to a sports complex with artificial turf and night lighting would significantly alter the current character and use of the western end of Golden Gate Park. This end of the park is largely naturalistic by design, and differs from a neighborhood park. The Park has been this way for more than a century, providing important habitat for all sorts of fauna, large and small, from birds of prey to soil microorganisms, as a complex, successfully interacting biological system. The project site is especially sensitive due to fact that it is adjacent to the Golden Gate National Recreation Area, and in near proximity to the GGNRA's restored dune habitat.

The Sierra Club believes that in order comply with the California Environmental Quality Act (CEQA), the following aspects must be studied in the Environmental Impact Report (EIR).

Zoning-compliant-equivalent alternative

Because the proposed project would be a significant alteration of the site's current and historic environment, the EIR should study the equivalent of a zoning-compliant alternative. For Golden Gate Park, the equivalent of zoning code is the Golden Gate Park Master Plan and the General Plan of the City and County of San Francisco. Both of these plans refer to the area of the site naturalistic and sylvan.

For example, the Golden Gate Park Master Plan (Page 3-2) describes the area of the project site:

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 a pastoral and woodland landscape with open meadows* defined by stands of trees and enhanced by lakes.

On page 3-4 the Master Plan describes the preservation of naturalistic areas:

POLICY A - NATURALISTIC PARKLAND Naturalistic parkland comprises the largest land category in Golden Gate Park, and must be preserved to protect the pastoral character of the park and to ensure the retention of park open space.

Similarly, the San Francisco General Plan states:

POLICY 3.1

*Strengthen the visual and physical connection between the park and beach. **Emphasize the naturalistic landscape qualities of the western end of the park for visitor use.** When possible eliminate the Richmond-Sunset sewer treatment facilities.*

POLICY 3.2

Continue to implement a long-term reforestation program at the western portion of the park.

San Francisco General Plan, Western Shoreline Plan,
http://www.sfgov.org/site/planning_index.asp?id=41411

The EIR's zone-compliant alternative should examine the environmental impacts of an alternative that complied completely with these two Plans.

Impact on the historical resources

As described above, the proposed project will significantly and permanently alter the current and historic nature of the western end of Golden Gate Park, which is listed in the National Register of Historic Places. Therefore, the EIR must evaluate impact in the impact of the project on historic resources of the Park, including, but not limited to the following:

- The change from a naturalistic, irregular space to an artificial rectilinear space
- The change from the historic pastoral, natural design to an urbanized, artificial design
- The addition of large amounts of lighting, artificial turf, new paving and fencing
- Historical aesthetic impacts of the elimination of the natural meadow and trees
- The effect of the reduction or elimination of historic uses of the current meadows, including picnicking, kite flying, bird watching, and amateur astronomy.
- The effect of 60-foot poles on views of the Park from the adjacent Golden Gate National Recreation Area.

Impact of toxic materials and compliance with Proposition 65

In 2008, the office of California Attorney General Edmond G. Brown sued several manufacturers of artificial turf fields, including FieldTurf USA. In 2010, the Attorney General won consent judgments against the manufacturers. The suit stated that FieldTurf and the other manufacturers violated California's Proposition 65, the Safe Drinking Water and Toxic Enforcement Act of 1986, by knowingly failing to disclose that their products contain lead. The Attorney General conducted testing and found high levels of lead in synthetic turf products.

Deputy Atty. Gen. Dennis Ragen, the state's lead attorney on the lawsuit was quoted in the Los Angeles Times describing high levels of lead dust in synthetic turf:

"As it ages, it forms more dust," he said, and could contain levels of lead that are more than 20 times what's allowed by Proposition 65."

(Los Angeles Times, "Suit sets stage for artificial-turf war," September 04, 2008)

Beach Chalet project proponents, including the project sponsors, have stated publicly that synthetic turf, and in particular, FieldTurf USA's products, contain no toxic substances. Clearly, the Attorney General has proven in court that this is simply not the case.

In addition to lead, independent testing of artificial turf installations in San Francisco and elsewhere have shown that the product contains zinc, cadmium, lead and mercury at levels that may exceed state and national safety levels for drinking water, storm water, and direct exposures.

Therefore, the EIR must study the short- and long-term effects of the synthetic turf's toxic effects, including, but not limited to the following:

- Effects of lead, zinc, cadmium and other toxics leaching into the groundwater aquifer
- Effects of toxic byproducts in storm water runoff
- Effects of toxics on the users of the fields, in particular, children, who are more susceptible to these effects
- Effects of toxics on the wildlife that reside in and visit park
- Toxic effects of the dust formed by the synthetic turf as it ages, and its distribution through the park ecosystem and potential introduction into the natural food chain.
- Toxic effects of the dust formed by the synthetic turf as it ages, in terms of being inhaled by users and absorbed through the skin
- Toxic effects of the pellets (or "crumb") that form as the field ages. Typically, the crumb spills out off of the fields and is blown by wind. The effects on wildlife of the distribution of the crumb through the western area of the Park must be studied.

These effects must be analyzed for the typical life of the product, which breaks down with age.

Effects of lighting

The project proposal includes night lighting on 60-foot-tall poles, and on new sidewalks and an enlarged parking lot, to be used nightly until 10pm. Regarding this aspect, the EIR needs to include environmental analysis of the following:

- Effects of lighting on migratory birds that fly up and down the coast.
- Effects of lighting on local birds that nest and feed in and around Golden Gate Park and the Golden Gate National Recreation Area. This includes the threatened snowy plover, which was listed as a threatened species in 1993 under the Federal Endangered Species Act.
- The effect of lighting on birds in various weather conditions, including the frequent fog and mist conditions common to the coast.

Loss of foraging habitat

The impact of the loss of grass meadows as foraging habitat for a variety of hawks, owls, thrushes, blackbirds, sparrows, gulls and warblers, as well as many mammals, must be studied. Especially important is the study of the contributions of the soil and its microorganisms and how these organisms feed into the biological chain of dependent interactions.

Impact of tree and shrub removal

The project proposes to remove a number of large trees as well as large “shrubs,” some of which are thirty feet in height. This includes, but is not limited to, the loss of the wind break and sand migration barrier, the loss of bird nesting and feeding habitat, and aesthetic considerations.

Construction-related impacts on trees

The Planning Department needs to study the effect of construction of the soccer complex on existing trees and large shrubs. This includes the effect of damage to roots caused by trenching of underground utilities.

Traffic Impacts

The new soccer complex will operate more fields than currently exist, each with more usage due to less down time for reseeding, etc., and due to longer hours of operations. In addition to attracting more players, the project also proposes to accommodate increased numbers of spectators with new facilities, including an expanded parking lot.

The EIR will need to analyze the impacts of this increased traffic, and it’s impact on surrounding bus service, in multiple scenarios, including, but not limited to:

- Normal rush hours during weekdays.
- Normal weekends during summer and fall months. Golden Gate Park and the adjacent parking lots at Ocean Beach are more heavily used in the summer and fall months.
- The traffic impacts must account for road closures on weekends in Golden Gate Park, and at

times throughout the year, including weekends when special events are held. The pattern of road closures for Saturdays is different than those of Sundays. Both need to be studied.

- Weekends with special events. This project site is in the vicinity of large-scale public events that attract up to 100,000 people several times a year. These events include Hardly Strictly Bluegrass, the Outlands Festival, the Bay-to-Breakers Race, the Aids Walk, and others.

The EIR will need to evaluate, in all of these different scenarios, the impact of this increased traffic on roads and intersections throughout Golden Gate Park and in surrounding neighborhoods, including feeder roads such as Fell Street, Lincoln Avenue, and Fulton Street. For instance, the EIR for the Golden Gate Park Music Concourse Underground Parking Facility showed severe impacts on the intersections at Lincoln and Ninth Avenue, and at Stanyan and Fulton Streets.

The increased air pollution and noise that result from the increased traffic must also be studied.

We also ask for full disclosure about where the users of the field will likely travel from, including outside of San Francisco, such as Marin, East Bay, or South Bay. The EIR should include decentralized alternatives with multiple sites closer to the home base of these users. The cumulative impact of 4 fields together is greater than 4 separate sites or 2 sites with two fields.

Cumulative effects on federal parkland

The EIR must evaluate the impact of the proposed project on the adjacent federal lands and the wildlife and habitat contained within. The Planning Department should also make a determination on whether an Environmental Impact Statement is required per the National Environmental Protection Act.

Impact of increased trash and food waste

The project proponents' stated goal of increased human usage of the field, both athletes and spectators, as well as the addition of concessions, will result in increased trash and food waste. This will likely increase populations of animals attracted to food waste and trash, such as ravens, crows, feral cats, raccoons, rats and other animals that prey upon native birds and other wildlife. The effects of these scavenger animals on birds and wildlife must be studied in the EIR.

Conclusion

The proposed soccer complex development would be a large and drastic change to the current and past nature and use of the west end of Golden Gate Park, with many probably and potential environmental impacts. We urge that the Planning Department do a careful and thorough analysis of these and other environmental impacts of the proposed project and include the results in the Draft Environmental Impact report.

Sincerely,

Rebecca Evans
Chair, Sierra Club San Francisco Group

Exhibit B

San Francisco Public Utilities Commission Logging Map for
San Francisco Westside Recycled Water Project (Case No. 2008.0091E)

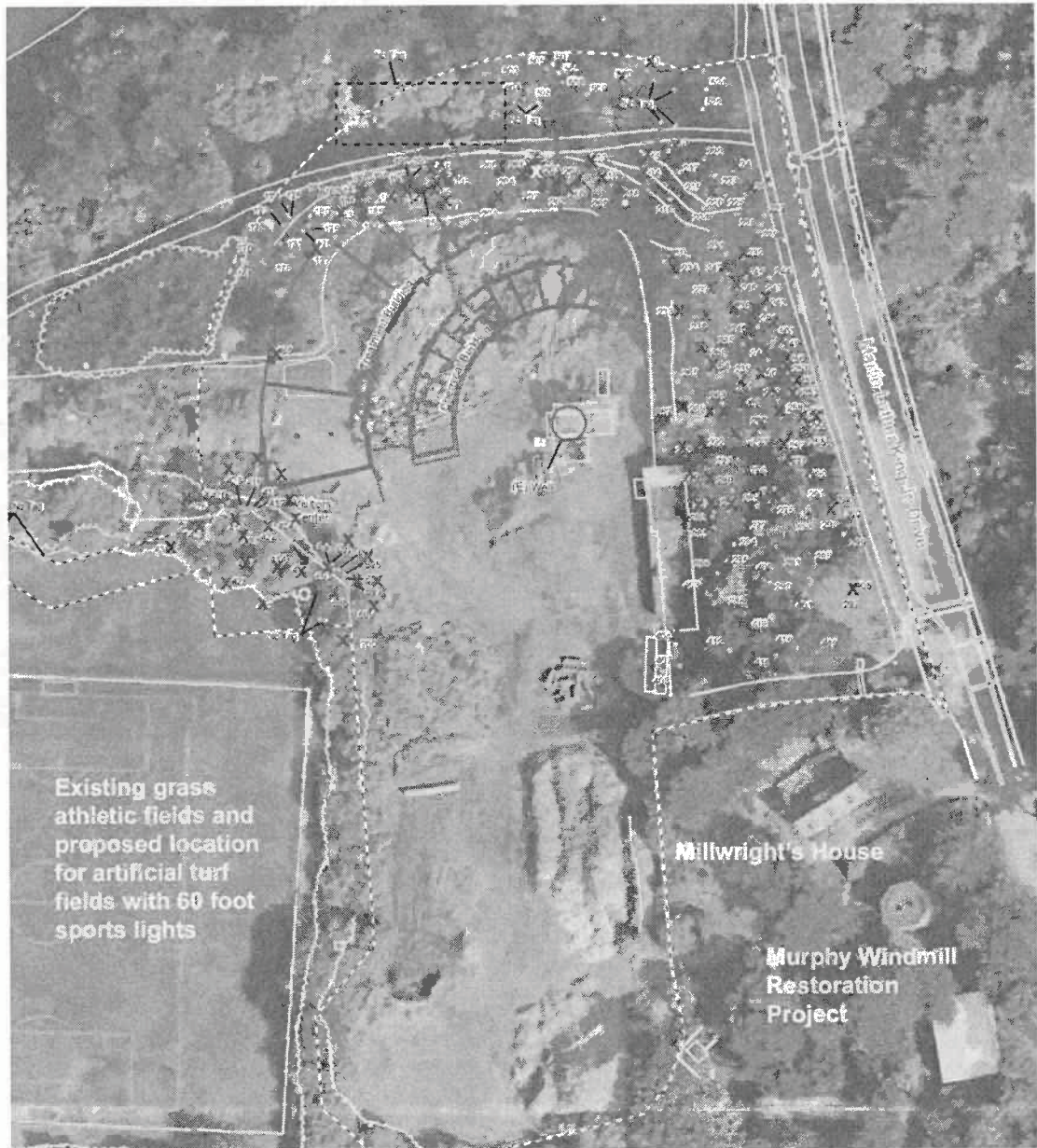


Exhibit C

Photograph of an area prone to flooding at the project site, located at
37 deg. 45 ' 58.24" N, 122 deg. 30 ' 32.88" W





**SIERRA
CLUB**
FOUNDED 1892

San Francisco Bay Chapter

Serving the counties of Alameda, Contra Costa, Marin and San Francisco

Don Lewis
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

RE: Comment deadline for Planning Department Case No. 2010.0016E

Dear Mr. Lewis

The Sierra Club requests a 60-day extension of the deadline for public comment to the Draft Environmental Impact Report (DEIR) for the Beach Chalet proposal.

The Sierra Club is still researching some of issues of a complex nature related to the adequacy of the DEIR, such as the absence of an analysis of the biological impact of the removal of several acres of meadow to be replaced with what is essentially pavement. This includes the effects of removing a large area of habitat that would essentially form a barrier between the GGNRA from the greater area of western Golden Gate Park. Another issue we are researching is that portions of the project proposal appear to violate city code, specifically 1998's Proposition J. There is also a question of the applicability of the California Attorney General's Proposition 65 suit against providers of synthetic turf and resulting settlement, which the DEIR does not appear to address. In addition to these issues, there are several other areas we are also investigating for the purposes of providing comments to the DEIR.

01

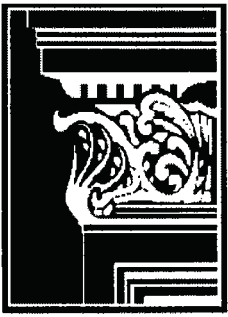
02

Given the limited resources of our organization and the timing of comment period over a major holiday, we believe the Planning Department should grand the Sierra Club's request.

Sincerely,


John Rizzo
Executive Committee
Sierra Club San Francisco Bay Chapter

cc. Christina Olague
Norman Laforce, Legal Committee Chair, Sierra Club San Francisco Bay Chapter
Arthur Feinstein, Chair Sierra Club San Francisco Bay Chapter
Becky Evans, Chair, Sierra Club San Francisco Group



SAN FRANCISCO
ARCHITECTURAL
HERITAGE

BOARD OF
DIRECTORS

Charles R. Olson
President

David Cannon
Vice President

Scott Haskins
Vice President

Carolyn Kiernat
Secretary

Jon Knorpp
Treasurer

Kathleen Burgi-Sandell

Alicia N. Esterkamp

Jeff Gherardini

Nancy Goldenberg

D. Michael Kelly

Frederic Knapp

Daphne Kwok

Benjamin F. Ladomirak

Arnie Lerner

Thomas A. Lewis

Chandler W. McCoy

Patrick M. Mc Nerney

Mark Paez

Michael Painter

Mark P. Sarkisian

Zander Sivyer

Christopher VerPlanck

David P. Wessel

Mike Buhler
Executive Director

December 12, 2011

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

Re: DEIR for Beach Chalet Athletic Fields Renovation (Case No. 2010.0016E)

Dear Mr. Wycko,

On behalf of San Francisco Architectural Heritage (Heritage), thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed Beach Chalet Athletic Fields Renovation. Heritage is a 501(c)3 non-profit founded in 1971 with a mission to preserve and enhance San Francisco's unique architectural and cultural identity. We agree with the Planning Department's finding that the proposed project will result in significant adverse impacts on historic resources. The DEIR, however, lacks a thorough analysis of the project's consistency with the Golden Gate Park Master Plan and fails to evaluate a reasonable range of potentially feasible alternatives. Accordingly, Heritage urges the Department to analyze a "compromise alternative" that incorporates elements of Alternatives 2, 3 and 4, as further described below.

01
02

The project site, located within the Golden Gate Park Historic District, is listed in the National Register of Historic Places. In addition, it is located directly adjacent to two San Francisco City Landmarks: Beach Chalet (#179) and The Murphy Windmill and Millwright's Cottage (#210). The pastoral quality of the park's western end is a character-defining feature of the Golden Gate Park Historic District. Even before the park was created, surveyor and engineer William Hammond Hall, "envisioned a woodland forest on the 600 acres west of Strawberry Hill" (Golden Gate Park Master Plan, (1998), 2-2). The significance of the Beach Chalet is directly linked to its surrounding bucolic environment; it was designed by Willis Polk to "reflect the low scaled development traditional to San Francisco's ocean frontage" (San Francisco City Ordinance 507-85, Landmark #179).

As you know, environmental review of the proposed project under the California Environmental Quality Act (CEQA) requires a detailed analysis of potentially significant adverse impacts on cultural resources and appropriate mitigation measures. According to CEQA, public agencies "should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available that would substantially lessen the environmental effects of such projects" (PRC §21002). CEQA Guidelines

2007 FRANKLIN ST.
SAN FRANCISCO
CALIFORNIA 94109
TEL 415-441-3000
FAX 415-441-3015
www.sfheritage.org

require an EIR to describe a range of reasonable alternatives that could feasibly attain the project’s basic objectives. By proposing to introduce artificial turf and stadium lighting to the western portion of Golden Gate Park, the proposed project is inconsistent with several policies in the Golden Gate Park Master Plan that prioritize protection of the west end’s “pastoral and sylvan landscape.” The Golden Gate Park Master Plan indicates that the western end of the park was intended to maintain naturalistic landscape qualities:

- *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 (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 (Page 3-2).*
- *The integrity of the pastoral and sylvan landscape must be maintained and remain unaltered (Page 3-9).*
- *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 (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 (Page 4-5).*

03

The DEIR fails to adequately analyze the impacts of the proposed project or formulate alternatives within the context of these policies. Findings of the DEIR state that:

The proposed project would be generally consistent with [Golden Gate Park Master Plan] policies because the project would be implemented entirely within the boundaries of the existing complex, the proposed turf would be consistent with the character of the use as an athletic field complex, any trees or shrubs removed would be replaced at a ratio of at least 1-to-1, and the project would not diminish or encroach upon the surrounding open space (III-8).

04

The proposed project, however, does expand beyond the boundaries of the existing complex by two acres. Moreover, installing 60-foot field lights will have significant impacts on the surrounding open space, particularly at night. The Golden Gate Park Master Plan indicates that in areas not designated for nighttime use (including the project site), park lighting

05

“would generally be limited to a minimal amount of street lighting for safety” (III-9). Installing ten 60-foot field lights is clearly not in line with this policy and will undoubtedly alter the naturalistic character of the park’s west end. Although there are at least two potentially feasible alternatives identified in the DEIR (Alternatives 3 and 4), neither would maintain the bucolic character of the west end of the park. Heritage is encouraged by several changes to the original design that help maintain the naturalistic and historic feel of the west end, including the proposal to install small-scale, removable seating and to install a pathway consisting of decomposed granite (Alternative 3 and 4). Nevertheless, we believe that the DEIR does not adequately meet CEQA requirements to provide a range of reasonable alternatives.

↑
05
cont.
|
06

Heritage strongly believes there is more than one feasible alternative to the proposed project. Alternatives 3 and 4 outlined in the DEIR appear to be feasible because the DEIR acknowledges that they both meet a majority of project objectives. However, we urge the Planning Department to consider an additional “compromise alternative” combining elements of Alternatives 2, 3 and 4 that would adhere to Golden Gate Park Master Plan. The “compromise alternative” would call for the use of natural turf (Alternative 3), no lights (Alternative 4), and renovation of West Sunset Park (Alternative 2). The “compromise alternative” would allow for renovated fields, improved drainage, and natural turf and no or significantly reduced lighting at Beach Chalet, and allow remaining funds to help renovate West Sunset Park with artificial turf and additional lighting. While such an approach does not meet all of the applicant’s desired criteria, it would meet most of the stated objectives while retaining the essence of Golden Gate Park’s historic fields.

|
07

On behalf of San Francisco Architectural Heritage, thank you for the opportunity to offer these comments. Please do not hesitate to contact me at mbuhler@sfheritage.org or (415) 441-3000x15 should you have any questions or need additional information.

Sincerely,



Mike Buhler
Executive Director



SAN FRANCISCO
CHAMBER OF COMMERCE *Where smart business starts.*

RECEIVED AT CFC HEARING 12-1-11
2010.00162
{D. LEWIS}

December 1, 2011

Hon. Christina Olague
President, Planning Commission
City and County of San Francisco
1650 Mission St.
San Francisco, CA 94103

RE: Beach Chalet Soccer Fields Renovation Draft EIR

Dear President Olague:

The San Francisco Chamber of Commerce, representing over 1,500 local businesses, urges the Planning Commission to approve the Draft EIR for the proposed renovation of the Golden Gate Park Beach Chalet Soccer Fields. The environmental impact report before you today adequately reviewed the various possible impacts from this project and determined that no significant impacts on the environment will result from the renovations of this existing park use.

It is clear from the use of recreational fields throughout the city that we have a shortage of soccer fields. With no new open space available to build new fields, the only viable solution has been to renovate existing fields into year-round, all weather facilities. The renovation of the Golden Gate Park soccer fields will give San Franciscans hundreds of additional hours of recreational time, on safer, easier to maintain fields.

01

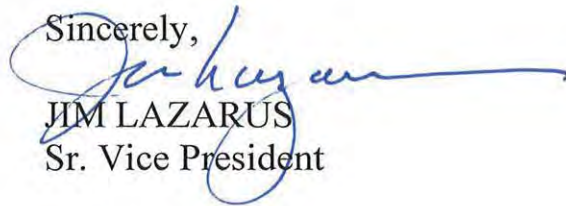
Changing these fields to artificial turf is no different than the installation of other updated facilities in the Park; children's playgrounds, curbs and sidewalks, new lighting, pending reconstruction of the stables, etc. And the concern over lighting seems misplaced when the site is next door to a restaurant, its lighted parking lot and the Great Highway.

02
03

December 1, 2011

We have a great opportunity to provide children and families with more athletic time in a safer facility with this proposed soccer field renovation. The Chamber urges the Commission to approve the Draft EIR.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jim Lazarus", with a long horizontal flourish extending to the right.

JIM LAZARUS
Sr. Vice President



December 12, 2011

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

Dear Bill and Members of the SF Planning Commission,

I am writing on behalf of my organization and the 280 boys and girls in our program. The San Francisco Lacrosse Club Riptide is non-profit organization intended to foster the growth of young men and women as well as the sport of lacrosse in the city of San Francisco. Our board members are all volunteers and I am proud to say that this is our eighth year of our program and we continue to grow.

We appreciate the opportunity that SFRPD provides us to use the public fields, predominately, Beach Chalet and the Polo Fields at Golden Gate Park. While we feel lucky that we have field space, there are three major challenges we face with using the grass fields in Golden Gate Park and a comment on the recent renovation of Raymond Kimball Field:

1) Field Condition – The grass fields at Beach Chalet and until recently, the Polo Fields, are filled with gopher holes, dead grass, and are worn because of the consistent use by many different sports organizations. We usually have one or two players twist their ankles and miss a couple weeks due to the condition of the grass fields. The risk of more serious injury is a great possibility.

2) Utilization - Lacrosse season starts in February and runs through May. The fields are often closed in February and March because of rain. There have been entire weeks where we have not been able to get on the fields for practices and have had to cancel games as well. We are only allocated two days a week for practice, so every opportunity to play is essential and we often to do not get to re-schedule games due to limited field space availability throughout our league.

3) Availability - Polo Field #7 is the only public field in Golden Gate Park that is currently lined for lacrosse. It is shared by multiple public / private high schools as well as three different youth lacrosse clubs in San Francisco. As you can imagine, finding time slots for games is a persistent challenge and the field is often in disarray by the end of the season. Lacrosse is the fastest growing sport in America and the field space issue is only going to compound in the coming years.

4) Positive Experience with Raymond Kimball Field -- During our 2011 season, we had the ability to utilize the new field turf fields at Raymond Kimball Field due to the delay in the renovation of the Polo Fields. During the days we had access to the Kimball Field, we able to utilize our full time limit due to the availability of lighting and did not have to cancel a single game or practice due to rain during the month of February or March.

I have attended the public hearings regarding the Beach Chalet renovation along with some of my parents and players. We fully support the proposed renovation at Beach Chalet soccer fields and encourage the San Francisco Planning Commission to approve the DEIR and move forward with the project.

01
02

By installing synthetic turf and lights at Beach Chalet, the City of San Francisco will be able to directly address the issues of field condition, utilization, and availability. It will dramatically improve the experience for not only the three youth lacrosse organizations in San Francisco, but for youth soccer and other leagues as well.

↑
02
cont.

I urge the SF Planning Commission to support the Beach Chalet Athletic Field renovation so that every child in our city has a place to play and enjoy the positive aspects that participating in sports brings to their development.

Sincerely,

Brent Deisher, Boys Director of Coaching
San Francisco Lacrosse Club - Riptide
415-440-8241
deisher@pacbell.net

Cc: Christina Olague, Commission President
Ron Miguel, Commission Vice President
Michael Antonini, Commissioner
Gwyneth Borden, Commissioner
Kathrin Moore, Commissioner
Hisashi Sugaya, Commissioner
Rodney Fong, Commissioner
Linda Avery, Commission Secretary
Don Lewis, Staff Contact



December 1, 2011

President Christina Olague
San Francisco Planning Commission
1650 Mission Street, Suite 400
San Francisco, CA 94103

Dear President Olague and Members of the Planning Commission,

On behalf of the hundreds of families represented by San Francisco Little League, I am writing to support the proposed renovation of the Beach Chalet Athletic Fields.


Little League teams share multi-use athletic fields throughout the City with a variety of youth sports played in the spring, including lacrosse and soccer. By renovating the Beach Chalet Athletic Fields with synthetic turf and field lights, more spring soccer and lacrosse can be accommodated at that site, making more multi-use fields available for baseball and Girls' softball.

And Little League desperately needs the fields. We provide kids of every demographic from all over the city the opportunity to play ball; unfortunately, we are turning away hundreds of kids because we don't have enough ball fields in San Francisco. A couple of weeks ago we opened and closed our age 12 and under youth baseball in less than 7 hours with over 900 kids registering. By way of comparison, the year prior we closed at our earliest ever in almost 3 weeks, and that was with the extra interest generated by the SF Giants winning the World Series. Within a few days after we closed this year we received over 200 complaints with people who took the time to write us. They continue to come in and we now believe there are hundreds more families that would like to participate but did not take the time to contact us.

We are a nonprofit, volunteer organization that is committed to youth sports in San Francisco. It is distressing to know that a world class city like ours does not have enough fields to service the needs of all the kids that wish to participate in programs like ours.

Please don't delay the Beach Chalet Athletic Fields Draft Environmental Impact Report. Our kids can't wait.

Sincerely,


Mike Singer
President, San Francisco Little League

Cc:
Mayor Ed Lee
San Francisco Board of Supervisors
San Francisco Planning Commission

RECEIVED AT CPD HEARING 12-1-11
2010, 0016 B
D. LEWIS



SF Ocean Edge

Where Golden Gate Park meets Ocean Beach . . .

www.sfoceanedge.org

December 12, 2011

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

Re: COMPROMISE ALTERNATIVE
Beach Chalet Athletic Fields Renovation
Planning Department Case No. 2010.0016E
State Clearinghouse No. 2011044005

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

Dear Mr. Wycko,

SF Ocean Edge believes that there is an alternative that will best satisfy the project objectives while preserving the priceless qualities of Golden Gate Park's naturalistic landscape. We would like to draw your particular attention to the attached letter from Rupert Clayton, describing the Compromise Alternative. This alternative includes:

- Renovating the Beach Chalet Athletic Fields with natural grass and no additional night lighting
- Renovating a second location outside of Golden Gate Park with a new playing surface and some night lighting; this could be the West Sunset Playing Field, as described in the DEIR, or additional playing fields.

This alternative meets the majority of the project objectives while preserving the unique qualities of Golden Gate Park. It provides a win-win situation for everyone. We hope that the Planning Department will seriously considers this alternative

Sincerely,

Katherine Howard
Member, Steering Committee
SF Ocean Edge
1243 42nd Avenue
San Francisco, CA 94122

cc: Don Lewis, ERO, SF Planning Department
Susan Brandt-Hawley, Esq.

01



SF Ocean Edge

Where Golden Gate Park meets Ocean Beach . . .

www.sfoceanedge.org

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

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

Dear Mr. Wycko,

Attached please find letters from our supporters regarding the above project. Please include these in comments in the EIR.

Please forward to us a printed copy of the Comments and Responses, the Final EIR, and any other notifications regarding this project as soon as they are available.

Please also send the printed copies of the C&R, the FEIR, and any other notifications regarding this project as soon as they are available to our attorney:

Susan Brandt-Hawley
Brandt-Hawley Law Group
Preservation Law
Chauvet House • PO Box 1659
Glen Ellen, California 95442
707.938.3900

Sincerely,

Katherine Howard
Member, Steering Committee
SF Ocean Edge
1243 42nd Avenue
San Francisco, CA 94122

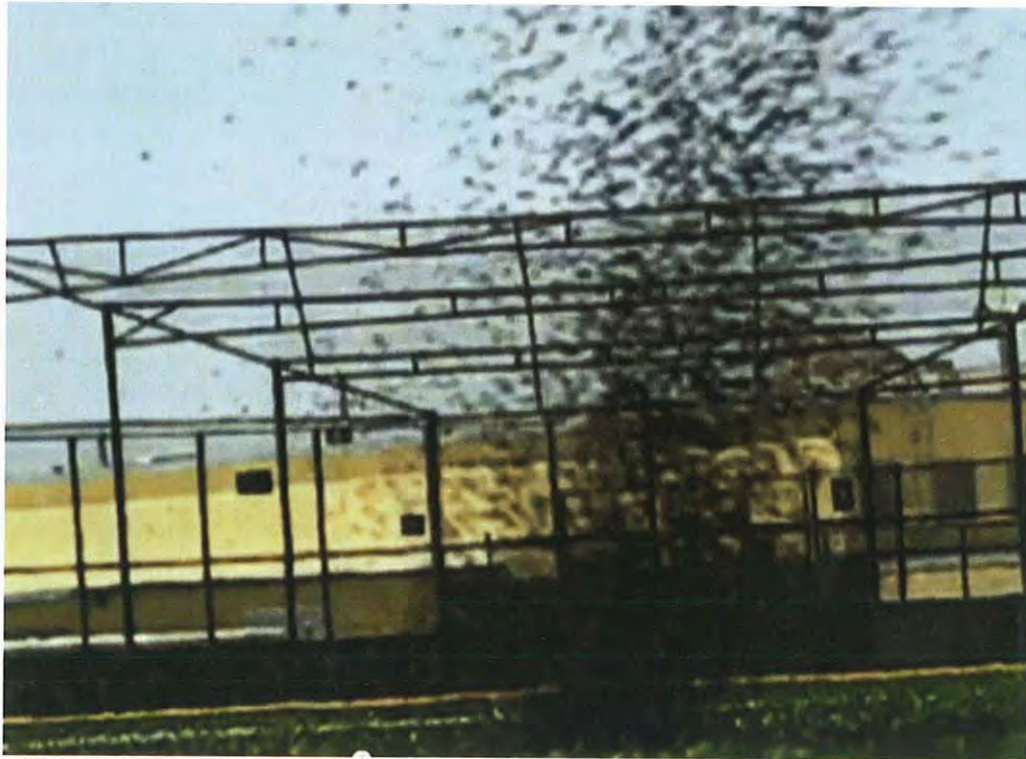
cc: Don Lewis, ERO, SF Planning Department
Susan Brandt- Hawley, Esq.

01

December 12, 2011

DON LEWIS

Public Comments on;
City and County of San Francisco
Beach Chalet Athletic Fields Renovation, Draft Environmental Impact Report
Planning Department Case No. 2010.0016E
State Clearinghouse No. 2011022005



RECEIVED

DEC 12 2011

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
RECEPTION DESK

Kelley Watts
San Francisco
SFPARKS

Acknowledgements;

Safe, Healthy Playing Fields Coalition, Environmental Working Group, Environment and Human Health, Inc., Mayo Foundation for Medical Education and Research (Mayo Clinic), SynTurf.org., The Truth.com, Potrero Boosters Neighborhood Association, Francisco Heights Civic Association, Coalition for San Francisco Neighborhoods, and many other supportive individuals, and groups.



December 12, 2011

Public Comments on;
City and County of San Francisco
Beach Chalet Athletic Fields Renovation, Draft Environmental Impact Report
Planning Department Case No. 2010.0016E
State Clearinghouse No. 2011022005

Kelley Watts
San Francisco
SFPARKS
kw021605@sbcglobal.net

Acknowledgements;
Safe, Healthy Playing Fields Coalition, Environmental Working Group, Environment and Human Health, Inc., Mayo Foundation for Medical Education and Research (Mayo Clinic), SynTurf.org., The Truth.com, Potrero Boosters Neighborhood Association, Francisco Heights Civic Association, Coalition for San Francisco Neighborhoods, and many other supportive individuals, and groups.

The following comments are intended to aid and assist in meeting the CEQA requirements 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.

We chose our public comments to focus on our overriding primary position which is that; there is no more important impact to be assessed and thoroughly and clearly addressed by this Environmental Impact Report than the toxic impact of this project on the health its users and other citizens.

We have three revisions we would like the Authors, the Lead Agency, and consultants to prioritize.

They are subtitled in this public comment as;

- **OVERRIDING POSITION** (PAGE 3)
- **THE DEIR'S STATED "EXPECTATION" REGARDING NANOPARTICLE EXPOSURE** (PAGE 8)
- **ALTERNATIVE 2: OFF-SITE ALTERNATIVE** (PAGE 38)

It is our position that this San Francisco EIR carries an additional burden not shared by many of the other reports mentioned within the DEIR. We suggest that this EIR and the reputation of San Francisco as a forward thinking "green" community will be cited and exploited by the Synthetic Turf Industry for years to come. Already communities across the country report that the Synthetic Turf Industry salesmen characterize San Francisco as NOT having any problem with SBR tire crumb and plastic turf. As a medical doctor in Maryland wrote about this EIR, "So goes San Francisco, so goes the country."

"The City and County of San Francisco has not formally adopted significance standards for impacts related to hazards and hazardous materials, but generally considers that implementation of the proposed project would have a significant impact if it were to:

Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;" (DEIR page IV.H-27)

The DEIR states that;

"CEQA requires that the lead agency neither approve nor implement a project unless the project's significant environmental effects have been reduced to a less-than-significant level, essentially "eliminating, avoiding, or substantially lessening" the expected impact, except when certain findings are made. If the lead agency approves a project that will result in the occurrence of significant adverse impacts that cannot be mitigated to less-than-significant levels, the agency must state the reasons for its action in writing, demonstrate that its action is based on the EIR or other information in the record, and adopt a Statement of Overriding Considerations." (DEIR page I-1)

01

OVERRIDING POSITION

It is our overriding position that;

There is no more important impact to be assessed and thoroughly and clearly addressed by this environmental impact report than the toxic impact of this project on the health of the users and other citizens.

In the Appendix A NOP / Initial Study of the DEIR under HAZARDS AND HAZARDOUS MATERIALS it asks, does it; "Topic a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? (**Potentially Significant Impact**)" (pages 53 and 54)

Subsequently, this topic appears to have been rewritten in the DEIR to read; "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. (**Less than Significant**)" (pages ES-14 and IV.H-27)

It is our position that the findings in the DEIR, and in the collective data cited by the DEIR, do not support such a finding or change in findings. It is also our position that data contained in the DEIR, and in reports cited by the DEIR, supports the most significant finding available to the Lead Agency be applied, which is (**Potentially Significant Impact**)".

It is therefore our position that Impact HZ-1 should be re-written to read;
Impact HZ-1: The proposed project could create a significant hazard to the public or the environment through routine use, disposal, handling, or emissions of hazardous materials. (Potentially Significant Impact)

It is our intention with the following comments to point out, reinforce, enhance, and supplement relevant data to support a significant impact position.

01
cont.

02

The proposed Beach Chalet Conversion entails nearly a quarter of a million pulverized tires in the form of SBR Tire Crumb spread over 9 acres in an accessible public space.

The Beach Chalet DEIR reports, "SBR is known to contain a number of VOCs, SVOCs (including benzothiazoles, aniline, and phenols), and metals (including barium, chromium, lead, manganese, and zinc). Impacts related to the routine use of the synthetic turf would be significant if the use resulted in adverse health effects due to inhalation of vapors and particulates from the synthetic turf, ingestion of the synthetic turf, dermal contact with the synthetic turf materials, (DEIR page IV.H-27).

The Beach Chalet DEIR also reports; "**The SBR material also contains carbon black**, an industrial chemical used in the manufacturing of automobile tires and other plastic materials." (DEIR page IV.H-2)

The Beach Chalet DEIR also reports; "It, (Carbon Black), is **composed of nanoparticles** that are much smaller than PM10 and PM2.5 (nanoparticles vary in size from 1 to 100 nanometers, with a billion nanometers forming a meter)." (DEIR page IV.H-2)

02
cont.

CARBON BLACK AND NANOPARTICLES

The proposed Beach Chalet Conversion entails nearly 2500 tons of SBR Tire Crumb spread over 9 acres in a public space in a loose, exposed, and uncontained manner.

The Beach Chalet DEIR reports; **"The SBR material also contains carbon black**, an industrial chemical used in the manufacturing of automobile tires and other plastic materials." (DEIR page IV.H-2)

Carbon Black is makes up to 40% to 60% of a tire and a synthetic field's SBR tire infill. Carbon Black is a petroleum derivative.

In 1995, and more recently in February 2006, an International Agency for Research on Cancer, (IARC), panel of experts conducted a comprehensive review of carbon black. The IARC is part of the World Health Organization. They concluded that there was "sufficient evidence" of carcinogenicity of Carbon Black in laboratory animals. Even in these early stages of research, IARC's overall classification placed Carbon Black in IARC's Group 2B as a "possible human carcinogen."

It is our position that this alone denotes **"a significant hazard to the public"**.

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. The listing was triggered by the 'authoritative' body mechanism in the California Code of Regulations and is based on the IARC reclassification from 1995/96.

The DEIR reports; "It, **(Carbon Black)**, is composed of nanoparticles that are much smaller than PM10 and PM2.5 (nanoparticles vary in size from 1 to 100 nanometers, with a billion nanometers forming a meter)." (DEIR page IV.H-2)

The Digest Journal of Nanomaterials and Biostructures reported in 2008;

Nanoparticles are able to cross biological membranes such as the blood-brain barrier and access cells, tissues and organs. Nanoparticles can gain access to the blood stream via inhalation or ingestion. At least some nanomaterials can penetrate the skin; even larger microparticles may penetrate skin when it is flexed. Turf burns, open wounds, even acne, or severe sunburn may accelerate skin uptake of nanoparticles. Once in the blood stream, nanoparticles can be transported around the body and be taken up by organs and tissues, including the brain, heart, liver, kidneys, spleen, bone marrow and nervous system.

"Nanomaterials have proved toxic to human tissue and cell cultures, resulting in increased oxidative stress, inflammatory cytokine production and cell death. Nanoparticles may be taken up by cell mitochondria and the cell nucleus. Studies demonstrate the potential for nanoparticles to cause DNA mutation and induce major structural damage to mitochondria, even resulting in cell death. Nanoparticles can activate the immune system inducing inflammation, immune responses, or allergies."

The Beach Chalet DEIR reports;

"Fine particulates small enough to be inhaled into the deepest parts of the human lung can cause adverse health effects, and studies have shown that elevated particulate levels contribute to the death of approximately 200 to 500 people per year in the Bay Area. High levels of particulates have also been known to exacerbate chronic respiratory ailments, such as bronchitis and asthma, and have been associated with increased emergency room visits and hospital admissions." (DEIR page IV.H-3)

"Laboratory research indicates that there can be health risks associated with the inhalation of these particles, (nanoparticles)." ...(DEIR page IV.H-3)

"Carbon black nanoparticles induce type II epithelial cells to release chemotaxins for alveolar macrophages."" Nanoparticles are considered a potential threat to the lungs and the mechanism of pulmonary response to nanoparticles is currently under intense scrutiny."

<http://www.particleandfibretoxicology.com/content/2/1/11>

03

NANOPARTICLE TOXICITY

Nanotoxicology is a sub-specialty of particle toxicology. It addresses the toxicology of nanoparticles (particles <100 nm diameter). Nanoparticles are often described as having the constituency of soot that forms on the inside of an oil lamp.

Calls for tighter regulation of nanotechnology have arisen alongside a growing debate related to the human health and safety risks associated with nanoparticles.

- In a Swedish study various nanoparticles were introduced to human lung epithelial cells. The results, released in 2008, showed that carbon nanoparticles caused DNA damage at low levels.
- The Royal Society of London identifies the potential for nanoparticles to penetrate the skin.
- Dr. Andrew Maynard, chief science advisor to the Woodrow Wilson Center's Project on Emerging Nanotechnologies reports that 'certain nanoparticles may move easily into sensitive lung tissues after inhalation, and cause damage that can lead to chronic breathing problems'.
- A major study published in Nature Nanotechnology suggests some forms of carbon nanoparticles could be as harmful as asbestos if inhaled in sufficient quantities.
- Carbon nanotubes are frequently likened to asbestos. In a recent study that introduced carbon nanotubes into the abdominal cavity of mice, results demonstrated that carbon nanotubes showed the same effects as asbestos fibers, raising concerns that exposure to carbon nanotubes may lead to pleural abnormalities such as mesothelioma. (Poland C, et al. (2008))
- Anthony Seaton of the Institute of Occupational Medicine in Edinburgh, Scotland said "We know that some carbon nanoparticles probably have the potential to cause mesothelioma. So those sorts of materials need to be handled very carefully."
- In October 2008, the California Department of Toxic Substances Control (DTSC), within the California Environmental Protection Agency, announced its intent to request information regarding analytical test methods, fate and transport in the environment, and other relevant information from manufacturers of carbon nanoparticles.

STUDIES OF THE TOXICITY OF CARBON NANOPARTICLES,

"Understanding the mechanism of toxicity of carbon nanoparticles in humans in the new millennium: A systemic review," by Mukesh Sharma (Occupational Medicine Division, National Institute of Occupational Health, Meghani Nagar, Ahmedabad, India), in *Indian Journal of Occupational and Environmental Medicine*, vol. 14(1), 2010, web publication June 24, 2010, abstract available at <http://www.ijoom.com/article.asp?issn=0019-5278;year=2010;volume=14;issue=1;spage=3;epage=5;auiast=Sharma> ;

Peter Gehr (Professor of Histology - the study of tissue - and Anatomy at the University of Bern, Switzerland, in interview with Kaspar Meuli, "Nanoparticles can penetrate brain tissue," on the website of the Federal Office for the Environment (FOEN) (also BAFU in German), March 2010, available at <http://www.bafu.admin.ch/dokumentation/umwelt/10649/10659/index.html?lang=en> and [here](#);

Brent Augustine, "Nanomaterials," a paper in relation to a course on nanosociety by Charles Tahan of the Laboratory for Physical Sciences at the University of Maryland, College Park, available at <http://www.tahan.com/charlie/nanosociety/course201/nanos/BA.pdf> (not dated) and [here](#); Andre Nel, Tian Xia, Lutz

Mädler, and Ning Li, "Toxic Potential of Materials at the Nanolevel," in *Science*, 3 February 2006: 622-627, abstract at <http://www.sciencemag.org/cgi/content/abstract/311/5761/622> ; and *The Honk Kong Standard*,

03
cont.

"Nanoparticle link to China deaths," August 21, 2009, available

http://www.thestandard.com.hk/news_detail.asp?we_cat=9&art_id=86662&sid=25016949&con_type=1&d_str=20090821&fc=2 and here and see Asia News,

"Their tiny diameter means that they can penetrate the body's natural barriers, particularly through contact with damaged skin or by inhalation or ingestion," Song wrote.

"Nanoparticles Linked to Deaths in Chinese Factory," August 21, 2009,

YouTube at <http://www.youtube.com/watch?v=Z9DinAm4n3s>

STUDIES OF THE TOXICITY OF CARBON NANOPARTICLES (in PubMed).

- Smith RG, Musch DC. Occupational exposure to carbon black: a particulate sampling study. *Am Ind Hyg Assoc J.* 1982 Dec;43(12):925–930. [[PubMed](#)]
- Gardiner K, Trethowan WN, Harrington JM, Calvert IA, Glass DC. Occupational exposure to carbon black in its manufacture. *Ann Occup Hyg.* 1992 Oct;36(5):477–496. [[PubMed](#)]
- Oleru UG, Elegbeleye OO, Enu CC, Olumide YM. Pulmonary function and symptoms of Nigerian workers exposed to Carbon black in dry cell battery and tire factories. *Environ Res.* 1983 Feb;30(1):161–168. [[PubMed](#)]
- Crosbie WA. The respiratory health of carbon black workers. *Arch Environ Health.* 1986 Nov-Dec;41(6):346–353. [[PubMed](#)]
- Robertson JM, Diaz JF, Fyfe IM, Ingalls TH. A cross-sectional study of pulmonary function in carbon black workers in the United States. *Am Ind Hyg Assoc J.* 1988 Apr;49(4):161–166. [[PubMed](#)]
- INGALLS TH, RISQUEZ-IRIBARREN R. Periodic search for cancer in the carbon black industry. *Arch Environ Health.* 1961 Apr;2:429–433. [[PubMed](#)]
- Robertson JM, Ingalls TH. A case-control study of circulatory, malignant, and respiratory morbidity in carbon black workers in the United States. *Am Ind Hyg Assoc J.* 1989 Oct;50(10):510–515. [[PubMed](#)]
- Hodgson JT, Jones RD. A mortality study of carbon black workers employed at five United Kingdom factories between 1947 and 1980. *Arch Environ Health.* 1985 Sep–Oct;40(5):261–268. [[PubMed](#)]
- Teta MJ, Ott MG, Schnatter AR. Population based mortality surveillance in carbon products manufacturing plants. *Br J Ind Med.* 1987 May;44(5):344–350. [[PMC free article](#)] [[PubMed](#)]
- MILLER AA, RAMSDEN F. Carbon pneumoconiosis. *Br J Ind Med.* 1961 Apr;18:103–113. [[PMC free article](#)] [[PubMed](#)]
- Valić F, Beritić-Stahuljak D, Mark B. A follow-up study of functional and radiological lung changes in carbon-black exposure. *Int Arch Arbeitsmed.* 1975;34(1):51–63. [[PubMed](#)]
- Wehr KL, Johanson WG, Jr, Chapman JS, Pierce AK. Pneumoconiosis among the activated-carbon workers. *Arch Environ Health.* 1975 Dec;30(12):578–582. [[PubMed](#)]
- Gardiner K, Trethowan WN, Harrington JM, Calvert IA, Glass DC. Occupational exposure to carbon monoxide and sulphur dioxide during the manufacture of carbon black. *Ann Occup Hyg.* 1992 Aug;36(4):363–372. [[PubMed](#)]
- Gardiner K, Hale KA, Calvert IA, Rice C, Harrington JM. The suitability of the urinary metabolite 1-hydroxypyrene as an index of poly nuclear aromatic hydrocarbon bioavailability from workers exposed to carbon black. *Ann Occup Hyg.* 1992 Dec;36(6):681–688. [[PubMed](#)]

03
cont.

THE DEIR'S STATED "EXPECTATION" REGARDING NANOPARTICLE EXPOSURE

It is our position that the expectation stated in the DEIR, **"it is expected that exposures to nanoparticles as a result of play on synthetic turf fields that use SBR infill would be minimal, if any at all."**, (DEIR page IV.H-3), should be stricken.

It is our position that combinations of the multi-fold health risks associated with SBR tire crumb and the **Carbon Black and nanoparticle exposure and bioavailability**, that it **should be considered an extremely significant potential hazard** to the public.

The DEIR's stated rationale for the expectation seems to be based to a large part on;

- The expectation that the wind will blow particulates away and,
- the report, "Evaluation of Health Effects of Recycled Waste Tires in Playground and Track Products" (2007). This report is about "rubber tire shreds" which are intended to be poured-in-place along with a binder. The report is NOT about pulverized SBR Tire Crumb.

It is our position that this stated expectation is unsubstantiated by scientific research, medical research, or what the DEIR acknowledges, "the **limited available research**" (DEIR page IV.H-3). It is not credibly supported in the literature and it is our position that it is an unacceptable assumption to include in this report.

It is our position that the paucity of data supporting such a claim makes it extremely irresponsible.

We strongly suggest that the potential risks and public health ramifications of including such an opinion that will surely be exploited are too significant.

03
cont.

**PROBLEMS WITH DEPENDING ON GOVERNMENT & INDUSTRY GENERATED REPORTS
RE: SBR TIRE CRUMB EXPOSURE**

It is our position that the current medical research available on the short and long term effects of repeated exposure of the human body to the chemical combinations found in SBR tire waste and plastic turf is extremely limited and insufficient.

There is only fragmented reporting available on independent toxicity safety assessment studies (with peer review, not designed or funded by either the rubber or recycled rubber industry) concerning environmental and human safety interactions with SBR tire crumb products.

The currently available reports, including those cited by the DEIR, reflect the conflicts of interest derived from the opposing interests of SBR tire waste recyclers, local governments responding to financial incentives, local governments responding to liability concerns regarding pre-existing synthetic field installations, and local governments allaying fears regarding pre-existing synthetic field installations.

Dr. D. Barry Boyd, Oncologist at the Greenwich Hospital in Connecticut and the Yale Cancer Center, said about the available reports, "While fear of raising concerns may be an understandable motive for limiting public information about risk, the long recognized goal of limiting childhood exposures to environmental hazards must take precedent. Because artificial turf playing fields are disproportionately used by children and adolescents, these childhood exposures to environmental carcinogens may add to lifelong risk of cancer as well as the exposures to the many respiratory irritants and toxicants found off-gassing from these fields."

Environment and Human Health, Inc. reports that, The Connecticut Academy of Science and Engineering (CASE), which performed the States peer review, advised that the findings of the artificial turf study "be softened" to avoid causing the public to be alarmed."

http://www.ehhi.org/turf/turf_pr_0710.shtml

The limited number of available reports tends to overlap by citing the same material or each other. Most reports on the health risks associated with artificial turf rely heavily on, risk assessments that have been conducted primarily by state agencies, consultants and industry groups. Many rely on extremely limited wipe samples and on-sight air measurements. The sample sizes for all currently available studies are insufficient, (grams of infill material representing 1000s of tons of heterogeneous non-homogenized SBR infill or a few blades of plastic turf representing acres of plastic turf). Many of the studies involve a few fields or less. As such it is our position that the vast majority, (if not all), of the **tests cited do not offer a reliable statistical power for making decisions that affect the public health.**

It is our position the following notations about the following Beach Chalet DEIR cited reports fit the definition and intent of 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

A SUMMARY OF LITERATURE REVIEW cited by this DEIR

- "2007 Integrated Waste Management Board Study", (CA)
- "2009 Office of Environmental Health Hazard Assessment Study", (CA)
- "2010 California Department of Resources Recycling and Recovery Study"
- "2009 "New York State Studies"
- "2010 "Connecticut Studies"
- "Bainbridge Island Evaluation", (WA)
- "2007 Leachate Study" by ALIAPUR
- "2008 San Francisco Synthetic Playfields Task Force Report", (CA)

2007 INTEGRATED WASTE MANAGEMENT BOARD STUDY – (CA)

"Evaluation of Health Effects of Recycled Tires in Playground and Track Products"

<http://www.calrecycle.ca.gov/publications/Tires/62206013.pdf>

Authored by Charles Vidair, Ph.D., Robert Haas, Ph.D. and Robert Schlag, M.Sc.

The California Integrated Waste Management Board (CIWMB) is a defunct state agency of California which used incentive grants and loans to spur the private sector into developing new markets for recycled materials with an emphasis on waste tire disposal sites. CIWMB provided for the "Waste Tire Playground Grant Program" to promote markets for recycled-content products derived from waste tires. The Board was dissolved in 2009.

This report examined "rubber tire shreds that are poured-in-place along with a binder, hardening into a permanent surface," (page 4). It did NOT look into SBR Tire Crumb which has a completely different constituency and completely different ingestion, inhalation, and dermal interaction properties and dynamics.

The gastric simulation was based on a tire shred. SBR Tire Crumb and Dust have a quantum difference in surface area compared to a tire shred. Tissue and human organ absorption of the nanoparticles, metals, and chemicals would be dramatically different.

The report used as its basis of analysis "a one-time ingestion of a 10-gram piece of shredded tire". This does not account for the ingestion of tire crumb and dust. It does not account for cumulative effects of the inhalation of tire crumb and dust. It does not account for the cumulative effects of dermal uptake of tire crumb and dust. It does not account for preexisting levels within the body. It does not account for the life span of metals accumulated in the blood stream. "Lead has a half-life of approximately 30 days in the blood." (Barnard – 2009 "Determining the Concentration of Lead in MIT Athletic Facilities and Estimating Student-Athlete Exposure to Lead", page 16)

This report never mentions that 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.

Excerpts from the 2007 Integrated Waste Management Board Study:

"**Disclaimer:** The statements and conclusions contained in this report are those of the contractor, (OEHHA), and not necessarily those of the California Integrated Waste Management Board, its employees, or the State of California and should not be cited or quoted as official Board policy or direction. The State makes no warranty, expressed or implied, and assumes no liability for the information contained in the succeeding text. "

Evaluation of toxicity due to ingestion of tire shreds based on the existing literature

"Overall, we consider it unlikely that a onetime ingestion of tire shreds would produce adverse health effects. Seven of the chemicals leaching from tire shreds in published studies were carcinogens." (1)

Evaluation of toxicity due to ingestion of tire shreds based on gastric digestion simulation

"Five of the chemicals released by tire shreds in the gastric digestion experiment were carcinogens." (1)

"The assumption that the risk from a onetime exposure is equivalent to the risk from the same dose spread over a lifetime is uncertain, and may overestimate or underestimate the true risk." (1)

Evaluation of toxicity due to chronic hand-to-surface-to-mouth activity

"From among the five chemicals identified by wipe sampling, the PAH chrysene is a carcinogen."...

"This risk is slightly higher than the *di minimis* risk level of 1×10^{-6} (one in one million), generally considered an acceptable cancer risk due to its small magnitude compared to the overall cancer rate (OEHHA, 2006). Calculation of the 2.9×10^{-6} (2.9 in one million) value does not account for many uncertainties, some of which would decrease the risk while others would increase the risk." (2)

Evaluating the potential for damage to the local environment and ecology

"Groundwater in contact with tire shreds contained elevated levels of many chemicals"

"...published studies indicate that concentrated leachate produced in the laboratory from tire shreds, crumb rubber or whole tires was toxic in 19/31 studies to a variety of organisms including bacteria, algae, aquatic invertebrates, fish, frogs and plants..." (2)

"2009 OFFICE OF ENVIRONMENTAL HEALTH HAZARD ASSESSMENT STUDY" – (CA)

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**

<http://www.calrecycle.ca.gov/tires/products/bizassist/health/turfstudy/litreview.htm>

In the introduction, this report states, "The California Tire Recycling Act (Public Resources Code 42870 *et seq.*) requires the California Integrated Waste Management Board (CIWMB) to develop new markets for recycled tires."

Some of the 41 data gaps that the author lists that prevent an "accurate safety assessment" of synthetic fields are;

- No study has measured the metals content of the particulates released by artificial turf fields. In addition, it is not known if field use increases particulate release.
- The variables of field age and field temperature should be monitored to determine whether they influence the release of chemicals and particulates into the air above these fields.
- Data are needed for the amount of time athletes spend on artificial turf playing fields. Data are needed for a variety of sports, age groups, and for both men and women. Other subgroups with potentially heavy exposure to fields include coaches, referees, and maintenance workers.
- Only a single study was located that compared the rate of skin abrasions on the new generation of artificial turf to natural turf. This was for high school football. Similar studies are needed for other sports, age groups, and for both male and female athletes.
- No data were located on the seriousness of the skin abrasions suffered by athletes on the new generation of artificial turf compared to natural turf.
- The bacterium MRSA has not been detected in artificial turf fields. However, fields in California have not been tested. Therefore, fields from different regions of the state should be tested to verify that the new generation of artificial turf does not harbor MRSA or other bacteria pathogenic to humans.
- Approximately 200 of the 300 VOCs (13 to 16 percent by weight) detected by Dye et al. (2006) were not identified, but were only reported as peaks on a graph. Therefore, potential health risks posed by these chemicals cannot be estimated.
- Many of the chemicals identified in the study of Dye et al. (2006) have no associated health-based screening levels, so that their health risks cannot be estimated. Thus, any attempt to classify these chemicals as carcinogens or developmental/reproductive toxicants will be an underestimate.
- Dye et al. (2006) did not measure the metals content of the airborne particulate matter (PM_{2.5} and PM₁₀). Thus, the health risks posed by inhaled particulates and the metals they contain, such as lead, cannot be determined.
- The effect of temperature on chemical and particulate levels has not been measured.
- The contribution of field age to chemical and particulate levels has not been measured.
- The effect of field use on the levels of either VOCs or particulates has not been measured. Thus, it is possible that air sampling before or during games would give different results.
- Determine if levels of respirable particulates (PM_{2.5} and PM₁₀) vary with field use; i.e., are the levels in the air higher during games compared to periods when the fields are idle?
- Tire-derived flooring, (SBR), emitted hundreds of low-level VOCs that were not identified, while other identified chemicals had no associated health-based screening levels. Therefore, the health risks posed by these chemicals cannot be estimated.
- Total VOCs (TVOCs) emitted by tire-derived flooring exceeded one mg/m³. Similar measurements of TVOCs should be made above artificial turf fields, since breathing low levels of a mixture of many VOCs may pose a health risk.

07

"2009 OFFICE OF ENVIRONMENTAL HEALTH HAZARD ASSESSMENT STUDY" – (CA) (continued)

The "2009 Office of Environmental Health Hazard Assessment Study" report makes estimates on the risk of cancer or developmental/reproductive toxicity based on "lifetime soccer play scenarios that are ", (page 32). In a section in the report subtitled "Is the Air Above Artificial Turf Fields Hazardous to Human Health?", Vidair summarized in response to the reliability of the cancer risk calculations, "Data gaps exist that could lead to overestimates or underestimates of these risks." (page 5)

"From among the 20 chemicals detected at the highest levels by Dye et al. (2006), seven were also detected in the New York State (2009) study. Concentrations of these seven chemicals were from 5- to 53-fold higher in the air above indoor fields (Dye et al., 2006) compared to the air above outdoor fields (New York State, 2009). Concentrations of particulates were also higher in the indoor study." (page 52)

"Lastly, it should be noted that most of the VOCs detected above artificial turf fields in the Dye et al. (2006) study were never identified. For example, for the field yielding the highest level of total volatile organic compounds (TVOCs, 716 ug/m³), 85 percent of the individual chemicals (representing about 20 percent of the mass of TVOCs) were not identified. This remains a significant source of uncertainty in assessing the health risks posed by these fields." (page 33)

In his conclusion Vidair states,

- "Dye et al. (2006) quantified eight chemicals that appear on the California Proposition 65 list of chemicals known to the state to cause cancer.
- Estimated inhalation exposures of soccer players to five of these (benzene, formaldehyde, naphthalene, nitromethane and styrene) gave theoretical increased lifetime cancer risks that exceeded the insignificant risk level of 10⁻⁶ (OEHHA, 2006).

(note - Dye, C., Bjerke, A., Schmidbauer, N. and Mano, S. (2006) Measurement of air pollution in indoor artificial turf halls. Norwegian Pollution Control Authority, Norwegian Institute for Air Research, Report No. NILU OR 03/2006, TA No. TA-2148/2006

07
cont.

“2010 CALIFORNIA DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY STUDY” – (CA)
 titled *“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.”*

This report was produced under contract by OEHHA. - **Author Charles Vidair**
<http://www.calrecycle.ca.gov/Publications/Tires/2010009.pdf>

This 2010 report identifies 47 data gaps that prevent an “accurate safety assessment” of synthetic fields.

The reports’ introduction declares;

The California Tire Recycling Act (Public Resources Code 42870 et seq.) requires the California Integrated Waste Management Board (now the Department of Resources Recycling and Recovery, or CalRecycle) to develop new markets for recycled tires.

“In a CBS 5 investigation report, (see YouTube <http://www.youtube.com/watch?v=iJ5xlaR27AY>), **Charles Vidair** admitted his department couldn't hire contractors in time to conduct airborne tests during the hot summer months. He blamed the budget and admitted that the results would be limited and said, "Of course, unless we measure under these different temperatures, we will never know the exact relationship between temperature and volatilization of chemicals," The \$200,000 spent on the report represents the only CalRecycle money anticipated to be spent on any scientific investigation of crumb rubber during this plan period. State Senator Abel Maldonado (R), who authored the bill which called for the research study, called the study “unacceptable and incomplete”.

FieldTurf, a Division of the Tarkett Group (EUR2.1 billion revenue in 2007), is the largest entity in the sports synthetic fields industry. “New Generation of Artificial Turf” is a promotional catch phrase they use to market FieldTurf synthetic fields. In his report published in 2009 Mr. Vidair never once used that phrase. One year later In this 2010 study, Vidair replaced the phrase “artificial turf “ with “New Generation of Artificial Turf” when describing the same product, (67 times). (The national Synthetic Turf Council markets their product with the phrase “New Generation Of Synthetic Turf”) <http://www.syntheticurfCouncil.org/displaycommon.cfm?an=3>

08

“NEW YORK STATE STUDIES” 2008 (literature review)

The analysis is a review of previous scientific studies and included no original research. The study was conducted by TRC Companies, an engineering, consulting and construction management company.

The NYC Department of Parks and Recreation (DPR) began installing synthetic turf playing fields in 1997 with a total of 94 installations. Concerns were raised by the public about the potential for exposure to chemicals found in the crumb rubber. This resulted in New York City department of Parks and recreation (NYC DPR) and the NYC Department of Health and Mental Hygiene (DOHMH) contracting a private consultant to lead a literature review. **They hired TRC Solutions who according to their web site, “actively provides services to large chemical and petrochemical clients”.**

In 2009 **Charles Vidair** wrote about the New York State Studies;

“Only two outdoor artificial turf fields were evaluated in the New York State (2009) study. The same two fields comprised the TRC (2009) study.” “A comparison of the chemicals detected in the air above the same two artificial turf fields that comprised the studies by New York State (2009) and TRC (2009) shows that chemical concentrations were consistently higher in the New York State (2009) study, **ranging from 1.7-fold to 85-fold higher**. The reasons for these differences are unknown. These variable results highlight the difficulties faced in obtaining consistent results from potential point sources of outdoor air pollution.”

“The air above fields was not tested for airborne metals. The previously reported finding of lead in dust sampled from some artificial turf fields indicates a potential for lead and other metals to become suspended in the air and possibly inhaled. Testing field air samples for metals is warranted.”

“In the study by New York State (2009), the relatively large number of TICs with peak match qualities below 85 percent indicates that these fields release many unidentified VOCs and sVOCs (“unknowns”). Some of these were at $\mu\text{g}/\text{m}^3$ levels (Table 11). It is likely that the health risks posed by these chemicals, if any, will not be known for the foreseeable future. The presence of a relatively large number of unidentified organic chemicals in the air over these fields is a potential health risk that cannot be evaluated at present.” – **Charles Vidair** (Addendum, July 2009)

New York City along with the Los Angeles Unified School District have since banned SBR infill.
http://www.usatoday.com/sports/2009-06-10-artificial-turf_N.htm

09

"CONNECTICUT STUDIES" (2010)

The Connecticut Studies were conducted by four state agencies.

The 2010 "**Connecticut Studies**" found, "The field investigation detected a variety of compounds that were present above the fields at concentrations greater than the range seen in background samples. Based upon the pattern of detection, it is considered likely that benzothiazole, acetone, toluene, methyl ethyl ketone, methyl isobutyl ketone, butylated hydroxytoluene, naphthalenes and several other [polycyclic aromatic hydrocarbons] PAHs were field-related".

"The laboratory studies showed offgassing of numerous compounds including polycyclic aromatic hydrocarbons (particularly naphthalenes), VOCs (e.g., benzene, hexane, methylene chloride, styrene, toluene), and rubber-related SVOCs (benzothiazole, tert-octylphenol, butylated hydroxytoluene). The primary constituent detected by both laboratories was benzothiazole.

10

The stormwater sampling detected "Three samples exhibited acute toxicity for both *Daphniapulex* and *Pimephales promelas*. The only analyte in the stormwater detected in concentrations exceeding acute aquatic toxicity criteria for surface waters was zinc. Zinc exceedences of the acute criteria were detected in the same three stormwater samples that exhibited acute toxicity for both *Daphnia pulex* and *Pimephales promelas*. These results showed that there is a potential risk to surface waters and aquatic organisms associated with whole effluent and zinc toxicity of storm-water runoff from artificial turf fields."

According to Environment and Human Health, Inc., "The Connecticut Academy of Science and Engineering (CASE), which performed the study's peer review, advised that the findings "be softened" to avoid causing the public to be alarmed. The CASE report urged the DPH to change its press release headline from "The Results Indicate Cancer Risks Slightly Above De Minimis Levels for All Scenarios Evaluated" to the more reassuring headline, "Result of State Artificial Turf Study: No Elevated Health Risk."

Environment and Human Health, Inc. in a review of the Connecticut studies wrote, "The, (Connecticut) health assessment looked at one chemical at a time for the artificial turf's affect on people's health – despite the fact that their data indicates that children are being exposed to a soup of toxins from these fields, and these exposures are experienced all at the same time. The data also shows that the more people who are playing on a field the more toxins are released — and thus the greater the exposures to students.

11

The study indicates a very high variability of the levels of toxins found in each field. Since there are 40,000 used tires in each field, enormous variability of toxins would be expected. The actual field-testing took place last summer when temperatures were unusually cool, between 70 and 80 degrees." (see Charles Vadair's 2010 OEHHA California study)

(Environment and Human Health, Inc. (EHHI) is a nine-member, non-profit organization composed of doctors, public health professionals and policy experts. http://www.ehhi.org/turf/turf_pr_0710.shtml)

"BAINBRIDGE ISLAND EVALUATION" (2008) , (literature review only)

http://sf-recpark.org/ftp/uploadedfiles/wcm_recpark/SPTF/Binder/6_Study_Synthetic_Turf_on_Bainbridge_Island.pdf

Bainbridge is an island town in Washington state with a population of 23,000. This 12 page report is written by Michael Johns, PhD, an aquatic scientist, who used "available scientific literature". Mr. Johns is an employee of Winward Environmental, L.L.C.. According to its web site, Dr. Johns provides technical support to clients involved in litigation regarding mining sites, petrochemical facilities, and heavy industrial sites. Tim Goodlin (a Bainbridge Island resident's) name was attached to the report later <http://waste.ky.gov/RLA/grants/Documents/BainbridgeIslandenvlanalysis.pdf>

The "Bainbridge Island Evaluation" is primarily a leachate study.

It cites only 7 reports;

- One is from ALIAPUR, (a tire industry organization)
- One is a geological map
- One is a power point presentation.
- It relies heavily on the 2007 INTEGRATED WASTE MANAGEMENT BOARD STUDY, "Evaluation of Health Effects of Recycled Tires in Playground and Track Products". This 2007 report explored "rubber tire shreds that are poured-in-place along with a binder, hardening into a permanent surface," (page 4). It did NOT look into loose SBR Tire Crumb which has a completely different constituency and completely different dynamics regarding leachate, ingestion, inhalation, and dermal uptake.

12

"2007 LEACHATE STUDY"

By ALIAPUR

In the Draft EIR, ALIAPUR is described as a "French governmental agency responsible for regulating the use of used tires". (DEIR page IV.G-8)

It is our position that description of ALIAPUR should be amended to include;

It was founded in 2003 by an international consortium of tire manufacturers, (Bridgestone , Continental, Dunlop, Goodyear, Kléber, Michelin and Pirelli), in response to their public relations problems regarding their responsibility for the mountains of accumulating tire waste. Over 1 billion tires are discarded annually.

It is our opinion that this study was designed to promote the recycling of tire waste and enable their continued business plan of planned obsolescence which was to continue to take precedence over implementing the technology of the production of tires with a longer life span.

It was only In 2009 that Aliapur implemented the French Ministry of Ecology Environmental Code, under the environmental obligations of manufacturers and importers of tires.

13

SYNTHETIC PLAYFIELDS TASK FORCE REPORT, (literature review only)

<http://sf-recpark.org/index.aspx?page=2307>

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.

Synthetic Playfields Task Force Findings and SFRPD Recommendations (page DEIR, IV.G-4)

The DEIR states that “The proposed synthetic turf would meet or exceed all parameters established by the San Francisco Recreation and Park Department Synthetic Playfields Task Force Findings and Department Recommendations”. “ (page II-14 DEIR)

It is our position that for Synthetic Playfields Task Force Report to be given appropriate credence, the following context needs to be included in the EIR;

On page 5 of the DEIR “Initial Study, the Synthetic Playfields Task Force is described in a footnote as having **“met for five months in 2008 from June through October”**. This is incorrect and gives a misleading impression of the extensiveness and quality of the research. The correct description should read that the Synthetic Playfields Task Force was scheduled for a total of 5 times for 2 hours at a time, (May 12th to July 31st). The first meeting involved a City Fields Foundation presentation by Dan Mauer, (a City Fields Foundation Board member), and the assignment of topics. The final meeting was a review of the task force draft report whose writing was managed by the San Francisco RPD. Only 3 of the 5 meetings involved topic presentations and discussion, (a total of 6 hours). In that six hours they were to cover 11 complex health topics. Subtracting roll calls, discussions of procedure, and general small talk they **averaged approximately a little over 20 minutes per topic**. (<http://sf-recpark.org/index.aspx?page=2307>)

The same footnote goes on to say; **“The Task Force was comprised of 16 members from various city agencies including other experts”** This is incorrect and gives a misleading impression of the backgrounds of the members. Nearly half of the members were simply “park users”, “neighbors”, etc., with no expertise or background on the subject. Very few members had knowledge or experience with their aspect of the subject matter.

Without an official “agendizing” by the RPD, the San Francisco Recreation and Parks Commission (Commission) established the Task Force. So few people heard about the Task Force that Jeanne Darrah, (who is listed on the City Fields Foundation web site as a volunteer and supporter), and is a member of the Park, Recreation and Open Space Advisory Committee, (PROSAC), was selected to fill a “citizen seat”. PROSAC is a politically appointed position and is listed on the City Fields Foundation web site as a supporter. PROSAC was already officially represented by Mary Lipian on the Task Force. Ms. Darrah never disclosed her affiliation with PROSAC or City Fields Foundation and is never listed as such. Patrick Hannan of City Fields Foundation is the past Chairman of PROSAC. Other seats were filled with groups listed on the City Fields Foundation web site as supporters.

As per Dawn Kamalanathan, 5 citizens were rejected as members, including a neighborhood association president and a citizen with a medical background who was asked to serve as the proxy for 5 different neighborhood associations. All 5 of the rejected citizens had in common that they had questioned the actions of the Playfields Initiative at the Parks Commission and had encouraged the formation of a Task Force.

14

SYNTHETIC PLAYFIELDS TASK FORCE REPORT, (literature review only) (continued)

Dan Mauer was designated by Dawn Kamalanathan, (the "Task Force Organizer"), to be considered by the task force as "the expert". Dan was never introduced as, or revealed that he was, a City Fields Foundation Board member. As the designated "expert", Mr. Mauer was allowed the special privilege of unlimited comment time. Dan Mauer is a Beach Chalet EIR project sponsor along with Dawn Kamalanathan and the City Fields Foundation.

City Fields Foundation's Susan Hirsch and Patrick Hannan, (a Beach Chalet Project Sponsor), were allowed by meeting organizer Dawn Kamalanathan to serve the Task Force Members with a catered buffet at each meeting which was consumed during meeting time. It is our position that this created a general distraction from thoughtful attention by participants if not create a potential bias.

The "representative from California Environmental Protection Agency" was Charles Vidair, an OEHA proponent of the tire recycling industry.

It is our position that the Synthetic Playfields Task Force Report is filled with City Fields Foundation propaganda, unfulfilled promises, and red herrings such as coconut/cork infill.

It is our position a more fair and accurate description of the Task Force is; the Synthetic Playfields Task Force involved mostly non-experts doing web searches on complex topics with which they had very limited experience. We feel that the transcripts bear this assessment out.

(<http://sf-recpark.org/index.aspx?page=2307>)

Additionally, the Task Force was called a joke even by some of its participants. The "citywide advocacy" member never returned after the first meeting. Participation was lack luster, (one member never spoke). By the time of the last presentation meeting, barely half of the members showed up. A role was not even taken for the Task Force Report approval meeting.

Guive Mirfendereski, Managing Editor of SynTurf.org, described the Task Force report as, " a masterpiece of obfuscation. It defends the use of artificial playfields and promotes the continued installation of artificial turf fields in the San Francisco area for some time to come. The Report's tone is defensive of Recreation and Park Department's long-held view that the turf fields are fine and the answer to increasing need for playing surfaces. With a few exceptions, there is not much critical thinking or even adequate research into the topics that the Task Force has addressed. "

We suggest that this Task Force was simply a symbolic, if not cynical, exercise by the City Fields Foundation and the RPD toward the appearance of due diligence. We suggest its report merely served the City Fields Foundation and RPD in promoting their "Playfields Initiative" agenda. We suggest that the "Synthetic Fields Task Force Report" it generated bears this out.

(http://sf-recpark.org/ftp/uploadedfiles/wcm_recpark/SPTF/SyntheticPlayfieldsReportFinalDraft082108.pdf)

14
cont.

PROBLEMS WITH DEPENDING ON GOVERNMENT & INDUSTRY GENERATED REPORTS RE: SBR TIRE CRUMB EXPOSURE (SUMMARY)

It is our position that the current research on the interaction of the many tire chemicals and the human body is insufficient to draw conclusions or well informed opinions. Chemicals that include but are not limited to polynuclear aromatic hydrocarbons (PAHs), phthalates, volatile organic compounds (VOCs), zinc, iron, manganese, nickel, PCB, copper, mercury, lead, cadmium, volatile nitrosamines, benzothiazole, isononylphenol, Carbon Black, nanoparticles)

Tires involve a complex blend of materials and chemicals to manufacture. A typical tire uses over one hundred primary raw materials. More than 50 different chemicals used in making tires have been noted in the Draft EIR. The most complete dataset was published by Dye et al. (2006). They identified almost 100 different chemicals and particulates. Another 200 chemicals were detected but not identified. The materials used in tire production have not been fully characterized in terms of their chemical and/or biological properties.

(<http://www.iss.de/conferences/Dresden%202006/Technical/NILU%20Engelsk.pdf>)

Concerns over high cancer rates in the rubber tire industry have been surfacing for over 50 years. Furthermore, suspicions have also arisen that other and hitherto unsuspected excesses of cancer might be occurring.

According to the Rubber Industry (International Agency For Research On Cancer, (IARC), Summary & Evaluation 1982; "Many materials involved in the manufacture of tires are experimental chemicals that can induce or increase the frequency of mutation in an organism (mutagens), or substances or agents that tend to produce a cancer (carcinogens). These include mineral oils, carbon black (extracts), curing fumes, some monomers, solvents, nitroso compounds and aromatic amines, thiurams and dithiocarbamate compounds, ethylenethiourea, di(2-ethylhexyl) phthalate, di(2-ethylhexyl) adipate and hydrogen peroxide.

Experimental toxicological information on chemicals that are used or formed in the rubber tire making process is restricted to a small fraction of all chemicals used: most compounds have not been investigated for their possible mutagenic or carcinogenic effects. Studies involving workers with a high exposure rate to tires have been carried out using exposure indicators, such as mutagenic activity in urine, thioether excretion and sister chromatid exchange, point to the possibility of exposure to mutagens <http://www.inchem.org/documents/iarc/vol28/rubber.html>)

"A large number of studies have been conducted on the rubber industries in Canada, China, Finland, Norway, Sweden, Switzerland, the UK and the USA [ref: 1-19]. Workers employed in the industry before 1950 have a high risk of bladder cancer, probably associated with exposure to aromatic amines. Leukaemias have been associated with exposure to solvents and with employment in back processing, tyre curing, synthetic rubber production and vulcanization. Excess mortality from lymphomas has been noted among workers exposed to solvents in such departments as footwear and in tyre plants [ref: 20]. Other cancers, including those of the lung, renal tract, stomach, pancreas, oesophagus, liver, skin, colon, larynx and brain, have been reported as occurring in excess in various product areas and departments, but no consistent excess of any of these cancers is seen across the various studies." <http://www.inchem.org/documents/iarc/suppl7/rubberindustry.html>

A study by The National Institute for Occupational Safety and Health (NIOSH) compared the number of bladder cancers among workers at a tire and rubber manufacturing plant from 1973 to 1988 with the number that would be expected in a similar population of New York State residents. NIOSH particularly examined a relationship between exposure of two suspicious chemicals involved in the tire making process; aniline and o-toluidine and human carcinogenic effect. One of those chemicals, o-toluidine, is known to cause bladder cancer in animals. Therefore, this chemical is thought to be the most likely cause of bladder cancer in workers. Another chemical, aniline, causes cancer in rats.

In this study, 8 cases of bladder cancer were found among workers "**definitely exposed**" to o-toluidine and aniline, while only 1.2 were expected. Among workers who were "**possibly exposed**" to these chemicals there were 4 bladder cancer cases observed and 1.05 expected.

<http://www.cdc.gov/niosh/pgms/worknotify/O-toluidine.html>

15

CONSUMER PRODUCT SAFETY COMMISSION'S TESTING FOR LEAD ON SYNTHETIC TURF FIELDS

The following is a synopsis of USCPSC testing by David Brown, Sc.D., Public Health Toxicologist for Environment and Human Health, Inc.

http://www.ehhi.org/turf/turf_study_analysis_0808.shtml

- The USCPSC report performed only 10 tests on four fields. There were three samples on three fields and one sample on one other field. This was presented as a sufficient representation of all fields from all sources.
- The table is padded with other turf data (less than 10) from unspecified sources with no relevancy to the fields in actual use. They wiped an area 50 cm long and 8 cm wide (18 inches long and 3 inches wide). Your hand is about 4 inches wide and 8 inches long.
- They divided the amount of lead found by 5 -- because they assumed that the hand is not as efficient at picking up lead as their wipe. They then divided that number obtained again by 2 -- because they assumed that only half of the lead could be taken from one's hand and become ingested.

The USCPSC's determination of a safe reference exposure:

- They compared the exposure to a blood level of 10 ug/dl as their level of concern - although current peer reviewed literature demonstrate health effects in children below that level.
- They then reference a position that chronic ingestion of lead should not exceed 15 ug/day. They then incorrectly assumed that the "not to be exceeded" level was an acceptable exposure level, which it is not.

The USCPSC's rationale makes no sense because of the following incorrect assumptions:

- Assumption 1. The child has no other exposures to lead each day. The assumption is incorrect based on population studies published by the centers for Disease Control and Prevention.
- Assumption 2. During an athletic activity the child only touches the surface with one hand one time each day.
- Assumption 5. Most of the lead on the surface is not released on the first pass over the surface. While there may be multiple passes over the surface there is no basis for a division by 5 or any other number, most of the lead is released by the first touch although additional lead is picked up with further wipes. If the CPSC had wiped the field 100 times would they have divided the amount obtains on their sample wipe by 100?

16

SAN FRANCISCO SYNTHETIC TURF STANDARDS

<http://www.scparks.com/pdfs/Synthetic%20Turf%20Standards.pdf>

The DEIR states;

“As discussed in Section IV.H, Hazards and Hazardous Materials and Air Quality, the synthetic turf standards specify that the vendor must submit a product analysis with their project bids, quantifying the content of their product.” (DEIR page IV.G-16)

“These standards were used to purchase synthetic turf for the Kimbell Playground in 2010 and Mission Playground field renovations in 2011.” (DEIR page IV.H-15)

The San Francisco Synthetic Turf Standards stipulate;

“All synthetic turf “vendors will conduct and submit product analysis with the project bid. Analysis will be presented in the form of certified laboratory results using specified standards and processes.”

“Analytical Methodologies: Representative samples of the turf fibers, turf backing, and infill material shall be analyzed for total metals content and semi-volatile organic compounds (SVOCs), as well as select analysis for leachable metals concentrations.”

I made several attempts to access this report as a citizen of San Francisco to be able to refer to in my DEIR comments. Beginning in November 2011, I made 5 “Immediate Disclosure Requests”, (as per section 67.29-5 of the Sunshine Ordinance), to San Francisco City Agencies for a copy of this report for the Kimbell Playground, (2 requests to the SF Department of the Environment and 3 to SF-RPD).

When I heard back from the SF Department of the Environment, they said that they did not have the reports.

When I heard back from the RPD they said, (in reference to the date of my last request),

“Your request dated Dec 6-2011, is not a “simple, routine or otherwise readily answerable” and does not meet the criteria for “immediate disclosure” under the San Francisco Sunshine Ordinance. (S.F. Adm. Code Sec. 67.25(a).) Accordingly, it is a standard public records request not subject to the expedited time limit for response that applies to an immediate disclosure request. Further, we must invoke an extension of 14 days because we will have to search for and collect the requested records from facilities separate from the office processing the request.”

In lieu of having the report we would still like to say that, It is our position that the tests stipulated, (and all tests cited by this report), including those presumably utilized by to address the San Francisco Synthetic Turf Standards are not sufficiently indicative of the heterogeneous non-homogenous mixture that is SBR Tire Crumb, especially in the quantities that are used and from the variety of manufacturing sources, (around 450 tire factories in the world).

17

SAN FRANCISCO ORDINANCE 53-07-USE OF RECYCLED MATERIALS

“City and County of San Francisco departments that award building contracts must include information on recycled content material used on public works projects in annual reports to SFE.” (DEIR Page IV.H-25)

It is our position that In the case of recycled tires pulverized into SBR Tire Crumb and exposed in a public space,(as is the case for synthetic fields), the of San Francisco departments that awards the building contract should submit this report for an appropriate review for Public Health scrutiny. It is our position that in the case of conflicts, the Precautionary Principle should prevail.

18

CALIFORNIA SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT (PROP 65)

<http://oehha.ca.gov/prop65/background/p65plain.html>

Proposition 65 requires businesses to notify Californians about significant amounts of chemicals in the products that are released into the environment. By providing this information, Proposition 65 enables Californians to make informed decisions about protecting themselves from exposure to these chemicals.

It is our position that heterogeneous non-homogenous SBR tire crumb and plastic synthetic fields fall under the guidelines of Prop 65 Chemical Reduction Act because:

- “Approximately 300 of 400 VOCs detected by Dye et al. (2006) on synthetic SBR tire crumb fields were not identified, so that their health risks cannot be determined.” – Vidair (2009)
- “From among the chemicals identified by Dye et al. (2006), eight appear on the California Proposition 65 list of chemicals known to the state to cause cancer. Exposure to five of these via inhalation (benzene, formaldehyde, naphthalene, nitromethane, styrene) gave increased lifetime cancer risks that exceeded one in one million (10^{-6}).” – Vidair (2009)
- “more than one cancer case could be expected to occur in a hypothetical population of one million people regularly playing soccer on these artificial turf fields between the ages of 5 and 55. The highest risk was from nitromethane, which could cause about nine cancer cases in a hypothetical population of one million soccer players.” – Vidair (2009)
- “While most of the VOCs identified by Dye et al. (2006) do not have MADLs developed under Proposition 65, data exist indicating that some cause developmental/reproductive effects in test animals. Thus, additional screening is required to more fully evaluate these risks.” – Vidair (2009)
- “The SBR material contains **carbon black**, an industrial chemical used in the manufacturing of automobile tires and other plastic materials. It is composed of **nanoparticles** that are much smaller than PM10 and PM2.5 (nanoparticles vary in size from 1 to 100 nanometers, with a billion nanometers forming a meter).” (DEIR page IV.H-2)
- Carbon black makes up to 40% to 60% of a tire as well as a synthetic field’s SBR tire infill.
- In 1995, and more recently in February 2006, an International Agency for Research on Cancer, (IARC), panel of experts conducted a comprehensive review of carbon black. The IARC is part of the World Health Organization. They concluded that there was “sufficient evidence” of carcinogenicity of carbon black in laboratory animals. IARC’s overall classification placed carbon black in IARC’s Group 2B as a “possible human carcinogen.” <http://www.carbon-black.org/faq.html#physical>
- “Particulate matter, also considered in risk evaluations related to inhalation, is a class of air pollutants ... Fine particulates small enough to be inhaled into the deepest parts of the human lung can cause adverse health effects, and studies have shown that elevated particulate levels contribute to the death of approximately 200 to 500 people per year in the Bay Area. High levels of particulates have also been known to exacerbate chronic respiratory ailments, such as bronchitis and asthma, and have been associated with increased emergency room visits and hospital admissions.” (DEIR page IV.H-3)
- “Laboratory research indicates that there can be health risks associated with the inhalation of these particles. (DEIR page IV.H-3)

19

Dye, C., Bjerke, A., Schmidbauer, N. and Mano, S. (2006) Measurement of air pollution in indoor artificial turf halls. Norwegian Pollution Control Authority, Norwegian Institute for Air Research, Report No. NILU OR 03/2006, TA No. TA-2148/2006

CUMULATIVE IMPACTS & DEIR "IMPACT C-HZ"

In regards to,

"Impact C-HZ: The proposed project in combination with past, present, and reasonably foreseeable future projects in the site vicinity, would not have a cumulatively considerable contribution to impacts related to hazards and hazardous materials. (Less than Significant)" (DEIR page IV.H-32)

Part of the basis of the finding of (Less than Significant) was stated as being "None of the studies discussed under "Setting," above, identified public health risks resulting from exposure to hazardous materials at outdoor synthetic turf fields." (DEIR page IV.H-32)

It is our position that studies discussed under "Setting" do identify public health risks that could result from exposure to hazardous materials at outdoor synthetic turf fields. More importantly the discussed studies identify **an abundance of data gaps** regarding exposure to hazardous materials at outdoor synthetic turf fields.

For example, in the "2009 Office of Environmental Health Hazard Assessment Study"; <http://www.calrecycle.ca.gov/tires/products/bizassist/health/turfstudy/litreview.htm>

41 data gaps that are listed that the author writes, "prevent an accurate safety assessment", i.e.;

- "Approximately 200 of the 300 VOCs (13 to 16 percent by weight) detected by Dye et al. (2006) were not identified, but were only reported as peaks on a graph. Therefore, potential health risks posed by these chemicals cannot be estimated." (page 17)
- "Many of the chemicals identified in the study of Dye et al. (2006) have no associated health-based screening levels, so that their health risks cannot be estimated. Thus, any attempt to classify these chemicals as carcinogens or developmental/reproductive toxicants will be an underestimate." (page 17)
- "No study has measured the metals content of the particulates released by artificial turf fields. In addition, it is not known if field use increases particulate release." (page 6)
- "Dye et al. (2006) did not measure the metals content of the airborne particulate matter (PM_{2.5} and PM₁₀). Thus, the health risks posed by inhaled particulates and the metals they contain, such as lead, cannot be determined." (page 17)
- Determine if levels of respirable particulates (PM_{2.5} and PM₁₀) vary with field use; i.e., are the levels in the air higher during games compared to periods when the fields are idle?" (page 27)
- "Tire-derived flooring, (SBR), emitted hundreds of low-level VOCs that were not identified, while other identified chemicals had no associated health-based screening levels. Therefore, the health risks posed by these chemicals cannot be estimated." (page 19)

In the conclusion of the study it states;

- "Dye et al. (2006) quantified eight chemicals that appear on the California Proposition 65 list of chemicals known to the state to cause cancer. (page 33)
- Estimated inhalation exposures of soccer players to five of these (benzene, formaldehyde, naphthalene, nitromethane and styrene) gave theoretical increased lifetime cancer risks that exceeded the insignificant risk level of 10^{-6} (OEHHA, 2006). (page 33)

"Lastly, it should be noted that most of the VOCs detected above artificial turf fields in the Dye et al. (2006) study were never identified. For example, for the field yielding the highest level of total volatile organic compounds (TVOCs, 716 ug/m³), 85 percent of the individual chemicals (representing about 20 percent of the mass of TVOCs) were not identified. This remains a significant source of uncertainty in assessing the health risks posed by these fields." (page 33)

20

CUMULATIVE IMPACTS & DEIR "IMPACT C-HZ" (continued)

In the **2010 California Department of Resources Recycling and Recovery Study** the author identifies 47 data gaps that "prevent an accurate safety assessment" of synthetic fields.

The 2010 "**Connecticut Studies**" found "The field investigation detected a variety of compounds that were present above the fields at concentrations greater than the range seen in background samples. Based upon the pattern of detection, it is considered likely that benzothiazole, acetone, toluene, methyl ethyl ketone, methyl isobutyl ketone, butylated hydroxytoluene, naphthalenes and several other [polycyclic aromatic hydrocarbons] PAHs were field-related..."

"The laboratory studies showed offgassing of numerous compounds including polycyclic aromatic hydrocarbons (particularly naphthalenes), VOCs (e.g., benzene, hexane, methylene chloride, styrene, toluene), and rubber-related SVOCs (benzothiazole, tert-octylphenol, butylated hydroxytoluene). The primary constituent detected by both laboratories was benzothiazole. Pre-weathering the crumb rubber outdoors for ten weeks decreased the volatile emissions 20-80%."

The stormwater sampling detected "Three samples exhibited acute toxicity for both *Daphniapulex* and *Pimephales promelas*. The only analyte in the stormwater detected in concentrations exceeding acute aquatic toxicity criteria for surface waters was zinc. Zinc exceedences of the acute criteria were detected in the same three stormwater samples that exhibited acute toxicity for both *Daphnia pulex* and *Pimephales promelas*. These results showed that there is a potential risk to surface waters and aquatic organisms associated with whole effluent and zinc toxicity of storm-water runoff from artificial turf fields."

In reference to elevated lead levels found at some New Jersey artificial fields, New Jersey epidemiologist Dr. Eddy Bresnitz said the lead levels were not high enough to cause poisoning in people who play on the fields. However, he said the levels could cause more damage in children already exposed to lead.

Environmental Working Group says regarding children's exposure to toxic chemicals, "Our children are being born pre-polluted."

It is our position that it is reasonable to assume that if a project has impacts related to hazards and hazardous materials that could be found as having a "potentially significant impact", then in combination with past, present, and reasonably foreseeable future projects in the site vicinity, it would also have a cumulative contribution to impacts related to hazards and hazardous materials.

It is our position that the Impact C-HZ: rating should be changed to (Potentially Significant Impact).

20
cont.

METHICILLIN-RESISTANT STAPHYLOCOCCUS AUREUS (MRSA)

Any research about surface bacteria such as Methicillin-resistant Staphylococcus aureus (MRSA) is absent from the Draft EIR report.

It is our position that in the context of the Draft EIR's stated "MAINTENANCE PROGRAM" that MRSA infection poses a "Potentially Significant Impact". The DEIR states in regards to scheduled maintenance "...no disinfectants or special detergents would be used". (Draft EIR page II-24),

A 2008 San Francisco Department of Public Health memo cited in the Draft EIR states that "MRSA is now a common disease in the community." "Any type of skin breakdown, including "turf burns," may provide a portal of entry for infection." Athletes are among the group at higher risk for MRSA infections, according to the Centers for Disease Control and Prevention (CDC).

We dispute the conclusions that a representative from SF-DPH gave to the 2008 San Francisco Synthetic Task Force that MRSA was not a turf problem because "people only get these infections from skin contact, open sores and contact with other people."

In a study that is cited in this DEIR, ("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 – OEHHA),

concluded that, "Participation in contact sports is a risk factor for infection by MRSA."

- Skin abrasions and other types of skin trauma are risk factors for MRSA infection in contact sports.
- Whether the new generation of artificial turf causes more skin abrasions than natural turf has only been carefully addressed in a single study (Meyers and Barnhill, 2004) of male high school football players. In that study, artificial turf was associated with a 9-fold higher incidence of "surface/epidermal injury" compared to natural turf.

The study goes on to say;

"Outbreaks in the general community, in otherwise healthy individuals, are considered community-associated MRSA. Risk factors for community-associated MRSA include young age and playing a contact sport (Boucher and Corey, 2008). In the case of athletes, this may be due in part to the frequent physical contact that occurs during play, as well as the propensity of these athletes to have skin cuts and abrasions.

An association between MRSA infection and player-to-playing surface contact could have at least two different explanations. Such contacts could cause relatively long-lasting skin abrasions that serve as efficient portals of entry for MRSA, perhaps during subsequent player-to-player contacts. Alternatively, the playing surface itself might be a carrier of MRSA, such that player contact with the surface transfers MRSA to the previously uncontaminated skin.

An association between skin abrasions due to falls to the turf (termed turf burns) and skin infection by MRSA has been tested in two MRSA outbreaks among football teams. In a college football team, players with MRSA-induced boils were 7.2-fold more likely to have had skin abrasions from artificial turf (new generation) than uninfected players (Begier et al., 2004). In a professional football team, eight of eight MRSA-induced skin abscesses occurred at the site of a turf burn.

The results of these two studies demonstrated an association between skin trauma due to falls to the playing surface and skin infections by MRSA. This suggests that traumatized skin is more susceptible to MRSA entry and infection. "

As mentioned above, a second possible explanation for why player-to-playing surface contact might be a risk factor for MRSA infection in competitive sports is that the playing surface itself is a source of MRSA. An inanimate object capable of transmitting infectious bacteria to humans is called a fomite. While player-to-player contact is considered the most important mode of sports-associated MRSA transmission, possible instances of fomite transmission have been reported.

MAINTENANCE / DISINFECTANTS

It is our position that the stated maintenance program does not adequately, if at all, address the daily bacteria buildup that is associated with organic material, (food, gum, blood, sweat, saliva, fecal material, and other general organic decay, etc.), that is regularly collected in an outdoor public synthetic turf's inorganic medium. Nor does it address the hidden debris (needles etc.) buried within the tire crumb.

One of the stated objectives given in the Draft EIR for the use of synthetic turf is to "reduce ongoing maintenance". EIR page II-5

The Draft EIR states, "Maintenance would consist of garbage pick-up and periodic sweeping and, as needed, spot washing of the synthetic turf (using only dish soap and water, no disinfectants or special detergents would be used). Although small amounts of solvents and adhesives could be required to make minor repairs, they would not be used in large quantities but only in spot applications at the specific repair location." - page II-24

"for example, the South Sunset Playground maintenance schedule includes sweeping every 2 weeks, or as needed, and turf grooming every 5 to 8 weeks. Repair of turf, removal of graffiti, and spot washing with soap and water is conducted as needed." - page II-24

Proper maintenance of synthetic turf requires that the fields be sanitized to remove body fluids and droppings. Soils in grass fields contain bacteria which decompose body fluids, algae, and dog, bird, and other droppings. These do not decompose on artificial turf. Regular lawn mowing accelerates the breakdown of introduced objects and material.

We believe the maintenance program as stated in the Draft EIR creates a situation that constitutes a potentially hazardous environment as defined in Section 25501(h) of the California Health and Safety Code.

Most all suppliers of synthetic turf require additional maintenance for their safe usage as well as to maintain warranty requirements.

Sportexe, (Crocker Amazon, etc.), recommends; "While routine brushing keeps your artificial grass field free of surface debris it does not, however remove the dangerous metal that may exist beneath." "You may be surprised at what could be trapped in your field."

<http://www.shawssportexe.com/content/page/maintenance>

FieldTurf, (Silver Terrace, etc), recommends the following cleaning products to "ensure compliance with FieldTurf's industry-best third-party insured warranty"

- FieldTurf Scrub - a powerful industrial cleaner and conditioner used for removal of grease and oil, mold and mildew, and can be used as a deodorizer.
- Static Conditioner - control of electrical static buildup on artificial grass surfaces.
- Gum Remover - a solvent formulated for removing gum, tar, and adhesives.

<http://www.fieldturf.com/artificial-turf-maintenance/>

Other industry recommended treatments include

- algaecides to mask the odor, and various specialized cleansers.
- germicide products – to target bacteria, fungi, and viruses.
- a large commercial grade magnet to sweep the turf to eliminate ferromagnetic metal parts to reduce injury via pins, needles, etc. that may be in the tire crumb.
- disinfectants including for methicillin-resistant staphylococcus, (MRSA)

<http://www.artificial-turf-maintenance.com/products/turf-protectant/>

Artificial turf came under national scrutiny when the CDCI and Prevention blamed turf burns for MRSA infections in five St. Louis Rams football players. The CDC investigation found the turf abrasions a, likely were a source of infection that was spread through shared equipment. According to the (CDC), "MRSA skin infections can occur anywhere including contaminated surfaces."

MAINTENANCE / DISINFECTANTS (continued)

“Synthetic Turf Sports Fields: A Construction and Maintenance Manual”, published by the American Sports Builders Association, states some synthetic turf owners disinfect their fields as often as twice a month, with more frequent cleanings for sideline areas, where contaminants concentrate.

It is our position that the project’s artificial surface area that is not intended for use as an athletic playing field or athletic court falls under the CA HEALTH AND SAFETY CODE SECTION 115725-115735. (“(2) "Playground" means an improved outdoor area designed, equipped, and set aside for children's play that is not intended for use as an athletic playing field or athletic court, and shall include any playground equipment, fall zones, **surface materials**, access ramps, and all areas within and including the designated enclosure and barriers.”

↑
22
cont.

2008 San Francisco Synthetic Fields Task Force handout

ALL PHOTOS WERE TAKEN AT SILVER TERRACE PLAY FIELD
IN SAN FRANCISCO OVER A FOUR MONTH PERIOD IN 2008

The majority of bacteria and viruses are invisible to the naked eye, (including Methicillin-resistant Staphylococcus aureus (MRSA). What is able to be depicted by these photographs are the growth medium and filth as a result of current maintenance protocol.



SAFE CHEMICALS ACT OF 2011

Earlier this year in the U.S. Senate - Senator Frank Lautenberg introduced the Safe Chemicals Act of 2011. This landmark legislation would require the chemical industry to test its products and prove that they're safe for vulnerable groups like children and senior citizens.

Research has found hundreds of chemicals in the umbilical cord blood of newborns. It indicates that babies being born every day have already been exposed to toxic chemicals.

The Safe Chemicals Act of 2011 would require the chemical industry to prove that its products are safe before they are sold. Under this bill, chemicals would have to be tested against a strong standard that protects the most vulnerable among us, especially children. The same safety standard has already been shown to be effective and feasible when used for determining the safety of pesticides. This bill would give the Environmental Protection Agency the authority to restrict or prohibit chemicals already known to be dangerous. It would also protect the public from smoke-screening secrecy claims.

It is our position that the proposed Safe Chemicals Act of 2011 should be mentioned in the EIR.

23

PROBLEMS WITH USING DE MINIMIS LEVELS FOR HEAVY METALS SUCH AS LEAD

The DEIR uses various reports and studies that choose various de minimis standards to determine acceptable levels of chemicals and metals in the human body to determine cancer risks and toxicity. Often they are very narrow in scope, (i.e. "3-year-old child ", "one-time ingestion")

The EIR quotes from a study regarding runoff from synthetic fields; "The predominant metals identified in the leachate from the crumb rubber material were zinc, followed by copper, manganese, and **lead.**" (DEIR page IV.G-9)

In her 2009 paper at Massachusetts Institute of Technology, "Determining the Concentration of Lead in MIT Athletic Facilities and Estimating Student-Athlete Exposure to Lead", Alison M. Barnard wrote, "**Lead has a half-life of approximately 30 days in the blood.**" (page 16)
http://web.mit.edu/eaps/senior_thesis/Thesis-%20Alison%20Barnard.pdf

Additionally Ms. Barnard found that, "The two ways in which lead can enter the body are though absorption in the lungs or absorption in the gastrointestinal tract (Goldman 2008). Inhalation of lead through the respiratory tract is the dominant method by which lead enters the adult body. Approximately 40% of the lead that is inhaled is absorbed (Fischbein 2007).

In contrast, the main route of exposure in children is through GI absorption, and absorption is estimated to be as high as 50% (Fischbein 2007).

In adults and children, once lead is absorbed, 99% of the lead binds to red blood cells known as erythrocytes, and the rest can enter the brain, bone marrow, and kidney.

It is our position that, since lead has been found to have a half-life of 30 days in the blood, then to determine a users cumulative exposure after 30 days of daily exposure would require multiplying the daily exposure by 30.

24

PROBLEMS WITH USING DE MINIMIS LEVELS FOR HEAVY METALS SUCH AS LEAD (continued)**Lead and Human Physiology:**

"A clinical study used a ^{204}Pb isotopic tracer to estimate the amount of lead absorbed during exposure to air of known lead concentration. It was found that $14\ \mu\text{g}/\text{day}$ of lead was absorbed by men exposed to ambient air containing $2\ \mu\text{g}/\text{m}^3$ of lead. ("Magnitude of Lead Intake from Respiration by Normal Man." J Lab Clin Med 90 (1977)).

In reference to elevated lead levels found at some New Jersey artificial fields, "New Jersey epidemiologist Dr. Eddy Bresnitz said the lead levels were not high enough to cause poisoning in people who play on the fields. However, he said the levels could cause more damage in children already exposed to lead."

"absorption of lead is higher in an empty stomach than after a large meal (Rabinowitz 1980)." ("Effect of Food Intake and Fasting on Gastrointestinal Lead Absorption in Humans." American Journal of Clinical Nutrition 33 (1980)).

"Overexposure to lead and lead poisoning can be difficult to diagnose due to the nonspecific symptoms of overexposure. In children, who are most susceptible to lead poisoning, symptoms range from mood changes such as irritability to gastrointestinal problems such as vomiting and constipation (Mayo Clinic 2007). Although lead poisoning is more rare in adults, they are still at risk especially if they have occupational exposure. The symptoms of overexposure for adults are even more nonspecific than those displayed by children. Symptoms include headaches, abdominal pain, and memory loss (Mayo Clinic 2007). "

"In order to test for lead poisoning that is ongoing or occurred in the previous three weeks, doctors routinely conduct a blood lead level test (Hu 2007). When testing for more chronic lead exposure, tests of free erythrocyte protoporphyrin (FEP) levels are accurate indicators of lead exposure that has taken place in the previous three months (Hu 2007). "

"Lead contamination is of particular concern because lead has no useful function in the body but it harms children's intelligence at quite low concentrations in the body. Since 1973, the action level of lead in children's blood (the point at which exposure reduction is recommended) has been lowered from 40 to $10\ \mu\text{g}/\text{deciliter}$, and the argument has been made that it should be lowered even further to $2\ \mu\text{g}/\text{deciliter}$. Toxicologist Steven Gilbert notes, "Currently, there appears to be no safe level of lead exposure for the developing child." Lead is listed as a carcinogen and developmental toxicant by the State of California." Philip Dickey, ("Occurrence of Bromine, Lead, and Zinc in Synthetic Turf Components", page 7-8,), (In reference San Francisco Department of the Environment's (SFE's) evaluation of synthetic turf products (PDF from SFEnvironment) http://sf-recpark.org/ftp/uploadedfiles/wcm_recpark/SPTF/rptsyntheticurftesting1007.pdf

"Although bromine was the main focus of this investigation, several other elements of concern were apparently found in some samples at quite high concentrations. These included arsenic, mercury, lead, and zinc." (pages 4-5) "Occurrence of Bromine, Lead, and Zinc in Synthetic Turf Components" Philip Dickey, (In reference San Francisco Department of the Environment's (SFE's) evaluation of synthetic turf products (PDF from SFEnvironment) http://sf-recpark.org/ftp/uploadedfiles/wcm_recpark/SPTF/rptsyntheticurftesting1007.pdf

Adam K Rowden, DO (Director, Division of Toxicology, Department of Emergency Medicine, AlbertEinstein Medical Center) said about pediatric lead poisoning, " Lead poisoning is probably the most important chronic environmental illness affecting modern children." "In children, virtually no organ system is immune to the effects of lead poisoning. Perhaps the organ of most concern is the developing brain. Any disorganizing influence that affects an individual at a critical time in development is likely to have long-lasting effects. Such is the effect of lead on the developing brain. Effects on the brain appear to continue into the teenaged years and beyond. The literature suggests that significant insult to the brain of children occurs at very low levels and that medical intervention with chelation fails to reverse <http://emedicine.medscape.com/article/1174752-overview>

SYNTHETIC TURF FIBERS

The "Conestoga-Rovers & Associates report, "Results of Laboratory Analytical Testing Artificial Turf Field City Fields Foundation. August 26, 2009", stated, "Sampling at each field included collection of two wipe samples each from green and white turf materials; one turf fiber sample each from green and white striped turf;" (DEIR page IV.H-18)

The Crocker Amazon testing report C-R & Assoc. for Sportex, (synthetic turf manufacturer), as supplied by City Fields Foundation to DEIR authors stated, "Area with painted markings were avoided."

It is our position that City Fields Foundation and Sportex supplied a turf sample analysis that minimized the chances of a high lead level reading. It is well known in the industry that "Lead chromate" or "chrome yellow" is the main source of elevated lead in turf fibers. By selecting the white and green fibers, and avoiding the yellow and brownish fibers used on City Fields/San Francisco installations, they provided a potentially skewed result.

Independent XRF screening of the yellow lines at San Francisco's Crocker Amazon & South Sunset fields came up 1% lead in 2011.

"The Consumer Product Safety Commission (CPSC), found in its study that red, yellow, and green blades had different levels of lead related to the different pigments used (CPSC 2008). Important outcomes of the CPSC study were the quantification of lead concentrations in turf samples and typical exposure and bioavailability of the turf for estimates of the daily ingestion of lead from turf fields. Ingestion of turf fiber fragments was assumed to be the main route of exposure, and that during field use; a certain number of fibers could collect on the hands of the user and be subsequently accidentally ingested." (Barnard, page 38) http://web.mit.edu/eaps/senior_thesis/Thesis-%20Alison%20Barnard.pdf

"At MIT, it was found that the concentration of lead in turf from Jack Barry field varied widely from location to location with the four different samples registering 44.7, 328.0, 3758, and 6007 ppm. The wide range in lead concentrations could be a result of small samples from a heterogeneous source that produced apparent variations in lead concentration" (Barnard, page 39) http://web.mit.edu/eaps/senior_thesis/Thesis-%20Alison%20Barnard.pdf

In reference to elevated lead levels found at some New Jersey artificial fields, "New Jersey epidemiologist Dr. Eddy Bresnitz said the lead levels were not high enough to cause poisoning in people who play on the fields. However, he said the levels could cause more damage in children already exposed to lead."

The DEIR states, "Because turf fibers are not expected to be directly ingested by field users, wipe samples were used to evaluate the amount of lead in dislodgeable dust that could be picked up by children's hands and inadvertently digested." (DEIR IV.H-18)

It is our position that, the expectation that users, (including children and animals), are not expected to ingest turf fibers is not based in our common experience of their behaviors and should be eliminated, and all considerations based on this expectation be reconsidered.

Other chemicals of concern in synthetic turf fiber that are not mentioned in this DEIR; Phthalates, Quaternary Ammonium Biocides, Oleamide, Bisphenol A, Acetone, Urethane, synthetic rubber (and Latex). (The various forms of synthetic rubber includes elastomers, ethylene propylene rubber (EPM) and ethylene propylene diene (EPDM) rubber. An elastomer is a polymer with the property of elasticity; thermoplastic elastomers (TPE) is used in making the turf granules or crumb pellets, as are EPM and EPDM.)

25

"INGESTION OF SYNTHETIC TURF PRODUCTS" (DEIR IV.H-29)

Conclusions and opinions were formed in this DEIR based on only **2 studies**.

- One was the **2007 OEHHA study** which "assessed the health risks resulting from ingestion of shredded tires, which are similar to tire-derived SBR material." (page IV.H-29)

It is our position that there are many crucial differences between shredded tires used for playground padding as explored in the report and the SBR tire crumb used on synthetic fields. This report explored "rubber tire shreds that are poured-in-place along with a binder, hardening into a permanent surface," (page 4). It did NOT look into loose SBR Tire Crumb which has a completely different constituency and completely different ingestion, inhalation, and dermal uptake dynamics.

This report used as its basis of analysis "a one-time ingestion of a 10-gram piece of shredded tire". This does not account for the ingestion of tire crumb and dust. It does not account for the inhalation of tire crumb and dust. It does not account for the dermal uptake of tire crumb and dust.

The gastric simulation was based on tire shreds. SBR Tire Crumb and Dust have a quantum leap difference in surface area compared to a tire shred. Tissue and human organ absorption of the tire chemicals would be dramatically different.

- The other study was **The Bainbridge Island evaluation, (2008)**, which is a limited literature review which relied heavily on the above 2007 OEHHA study.

The DEIR found that; "impacts related to ingestion of synthetic turf would be less than significant." IV.H-29

It is our position that

- based on the limitations of the cited studies,
- and the developing data being produced since these reports were produced regarding the carcinogenic nature of SBR tire crumb,

that impacts related to **ingestion of synthetic turf would be potentially significant.**

26

"DERMAL CONTACT WITH SYNTHETIC TURF PRODUCTS" (page IV.H-29)

Used the same two studies as the above "Ingestion of Synthetic Turf Products".

- One was the **2007 OEHHA study** which "assessed the health risks resulting from ingestion of shredded tires, which are similar to tire-derived SBR material." (page IV.H-29)

It is our position that there are many crucial differences between shredded tires used for playground padding as explored in the report and the SBR tire crumb used on synthetic fields. This report explored "rubber tire shreds that are poured-in-place along with a binder, hardening into a permanent surface," (page 4). It did NOT look into loose SBR Tire Crumb which has a completely different constituency and completely different ingestion, inhalation, and dermal uptake dynamics.

- The other study was **The Bainbridge Island evaluation, (2008)**, which is a limited literature review which relied heavily on the above 2007 OEHHA study.

The DEIR found that; "impacts related to dermal contact of synthetic turf would be less than significant." IV.H-29

It is our position that

- based on the limitations of the cited studies,
- and the developing data being produced since these reports were produced regarding the carcinogenic nature of SBR tire crumb,

that impacts related to **ingestion of synthetic turf would be "potentially significant."**

27

SBR TIRE CRUMB SAMPLING LIMITATIONS

SBR Tire Crumb is a heterogenous, non-homogenous mixture and as such cannot be accurately sampled or tested as if it were consistent.

It is our position that as such, no sample taken is a true indicator and cannot be taken as an accurate representation of the whole.

- Because SBR Tire Crumb is derived from a variety of manufacturers from around the world, (There are around 450 tire factories in the world.)
- Because SBR Tire Crumb is derived from tires from a broad range of production dates, (decades), (Only since 2000 have tire production dating followed a uniform code regulated by the U.S. DOT.)
- Because SBR Tire Crumb is derived from various parts of the tire which have different constituents and manufacturing processes, (i.e. side wall, tread, inner lining, ply, tread lug, etc.), and construction types, (bias, belted bias, solid, semi-pneumatic),
- Because SBR Tire Crumb includes "Tire Wear Particles", (TWP are agglomeration of material from the tire along with material from the road, vehicles, and the uptake of diesel incorporated through exhaust fumes bonding to the tires.
- Because SBR Tire Crumb is derived from a process that bags the material after shredding/pulverizing,
- Because SBR Tire Crumb spread on the field directly from the bag,

It is our position that as a heterogeneous, non-homogenous mixture, no SBR Tire Crumb sample taken is a true indicator and cannot be taken as an accurate representation of the whole.

Because the amount of unregulated heterogeneous, non-homogenous mixture introduced at only a single football field is in the tons. (Beach Chalet and alternative 2 / West Sunset would be in the 100s of tons.), and, because the sample size utilized to test this unregulated variegated, non-heterogeneous, non-homogenous is in grams, it is our position that majority of tests cited by this DEIR are inherently insufficient.

It is our position that the state of the art for accurate and quality sampling and data interpretation of SBR tire crumb and plastic synthetic fields has inherent and profound flaws and weaknesses. It is our position that 100% of the cited reports utilized a methodology that is insufficient for the task of determining the makeup of 1000s of tons of multi-sourced, non-heterogeneous, non-homogenous material used in a SBR based synthetic field. It is our position that in considering the many constituents and types of constituents, that the unknown factors create a significant hazard. Despite that, reports evaluating Synthetic fields, including those cited by the Draft EIR for the Beach Chalet, report their findings as sufficient and conclusive.

"A comparison of the chemicals detected in the air above the same two artificial turf fields that comprised the studies by New York State (2009) and TRC (2009) shows that chemical concentrations were consistently higher in the New York State (2009) study, ranging from 1.7-fold to 85-fold higher. The reasons for these differences are unknown. These variable results highlight the difficulties faced in obtaining consistent results from potential point sources of outdoor air pollution." (2009) New York City Department of Health and Mental Hygiene, "Air Quality Survey of Synthetic Turf Fields Containing Crumb Rubber Infill" http://www.nyc.gov/html/doh/downloads/pdf/eode/turf_aqs_report0409.pdf

28

SBR TIRE CRUMB SAMPLING LIMITATIONS (continued)

In 2009 "A Scoping-Level Field Monitoring Study of Synthetic Turf Fields and Playgrounds", (EPA/600/R-09/135 November 2009 www.epa.gov/ord - Prepared by the National Exposure Research Laboratory Office of Research and Development U.S. Environmental Protection Agency with contributions from the Agency's Tire Crumb Science Workgroup http://www.epa.gov/nerl/documents/tire_crumbs.pdf), was prepared as a report.

The following are some excerpts from their report:

- "There is evidence that the material is not homogeneous with regard to some constituents (Pb for example). Future site characterization studies should be considered to evaluate the issue of sample heterogeneity and the impact on data interpretation." Page 5
- "No evaluated method was available for assessing dermal and indirect ingestion from tire crumb constituents in turf field or playground surfaces. A standard surface wet wipe sample collection method for residential lead (Pb) measurement was used at the synthetic turf fields." Page 5
- "The in vitro Pb bioaccessibility method was judged not appropriate for the surface wipe samples. Because the in vitro method has been validated only for soil samples, additional validation studies would be required to fully demonstrate the relevance of the method for tire crumb and turf blade materials." Page 5
- "Although the methods appeared to perform reasonably well, a number of sample handling, size, and heterogeneity issues were discovered that may affect method performance and data interpretation." Page 5
- "There is a lack of appropriate QC/QA materials and spiking methods. QA/QC materials and procedures need further development for the methods as applied to these materials." Page 5
- "The wipe, tire crumb, and turf blade data identified a potentially significant variability in source contribution based on turf field blade color and type, along with the tire crumb fraction being analyzed. Additional research is needed to understand the factors influencing the reported variability before future studies are designed and conducted. Understanding the variability is important in developing improved approaches for site characterization." Page 5
- "Methods for analysis of metals in synthetic turf field and playground components showed good precision, but the assessment of recovery for some metals was difficult because of the nonhomogeneity of the bulk materials." Page 5,6
- "Additional validation efforts may be needed to interpret measurement results, particularly with regard to bioaccessibility of metals in synthetic turf field and playground components." Page 6
- "Research is needed to better understand relative source contributions, in particular for the wipe and air particle samples." Page 6
- "Testing and application of personal sampling methods would provide a more complete understanding of how environmental concentrations translate into potential exposures. Methods for collection and analysis of SVOCs were not tested in this scoping study but would be needed for a full characterization." Page 6

It is our position that these findings have a significant impact on the validity and interpretation of the reports cited in the Draft EIR for the Beach Chalet renovation.

28
cont.

TIRE WEAR PARTICLES (TWP),

Tire wear particles (TWP) are agglomeration of material from the tire along with material from the road and vehicles.

The uptake of diesel is incorporated through exhaust fumes bonding to the tires. Diesel exhaust contains over 40 organic chemicals identified by the EPA as Hazardous Air Pollutants (HAPs), also called air toxics, which are either suspected to cause cancer or create other serious health risks.

The organic chemicals that are of special concern include aldehydes, benzene, 1,3-butadiene, and polycyclic aromatic hydrocarbons (PAHs). It is the PAH's that are believed to create much of the cancer risk posed by diesel exhaust. In fact, because diesel exhaust contains so many substances that contribute to both a cancer and noncancer health risks in humans, the EPA considers diesel exhaust to be a mobile source air toxic.

Tests are of limited use because of concerns about the techniques used to identify the particles, a lack of standards in analytical techniques, a lack of standard collection methods, as well as seasonal effects.

It is our position that the lack of study available on the effect of TWP on users exposed to SBR Tire Crumb infilled athletic fields constitutes a potential health risk and "potentially significant impact".

29

NITROSAMINES

In the manufacture of tires nitroso compounds and aromatic amines are used. One nitrosamines study from the Netherlands in 2006 is mentioned in this Draft EIR.

It is our position that the lack of credible studies available on the effect of nitrosamine exposure to users of tire crumb infilled athletic fields constitutes a potential health risk and "potentially significant impact".

In retail shops and storage rooms of tires, N-Nitrosodimethylamine (NDMA) and N-nitrosomorpholine (NMOR) have been found in air concentrations. Nitrosamines are a class of chemical compounds that have been found to produce liver tumors in rats. (The Linus Pauling Institute) and are listed in this Draft EIR as a carcinogen.

Approximately 300 of these compounds have been tested and 90% of them have been found to be carcinogenic in a wide variety of experimental animals. Most nitrosamines are mutagens and a number are transplacental carcinogens, being able to journey across or passing through the placenta. Most are organ specific. For instance, dimethylnitrosamine causes liver cancer in experimental animals.

Since nitrosamines are metabolized the same in human and animal tissues, it seems highly likely that humans are susceptible to the carcinogenic properties of nitrosamines. (The Linus Pauling Institute) To determine the role of N-nitrosamines in air concentrations around tire factory workers, 19 factories were measured by area sampling or personal monitoring. N-Nitrosodimethylamine (NDMA) and N-nitrosomorpholine (NMOR) were found regularly, the air concentrations varying between 0.1 and 380 µg/m³ in personal monitoring. An environmental guideline for N-Nitrosamines in the tire rubber industry states that the total amount of N-Nitrosamines in the atmosphere must be below 1 µg/m³. The mean concentration was usually in the range of 1 –10 µg/m³.

30

INGESTION OF CHEMICALS OF POTENTIAL CONCERN (COPC)

Direct and indirect methods have been used in studies to determine the presence of Chemicals of Potential Concern COPCs in the crumb rubber.

These studies have found polycyclic aromatic hydrocarbons (PAHs), volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), benzothiazole, and metals in crumb rubber. They found crumb rubber, or the dust generated from crumb rubber, may be accidentally ingested by placing fingers in the mouth or not washing hands before eating and after playing on the fields.

Young children on the fields may eat the crumb rubber itself. Dust may be breathed in from playing on the field, or vapors that volatilize from the turf may also be inhaled. Some COPCs may also be absorbed through the skin by direct contact.

Some individuals such as soccer goalies, catchers, or assertive athletes would tend to have more material kicked into their face. Neighbors living next to a field would have a prolonged exposure to off gassing and dust. Surface proximate infants, children, or adults sleeping on SBR tire crumb would tend to have more intimate exposure. The cumulative daily dose of chemicals need to be considered.

"...the available but limited data on chemicals and particulates in the air above artificial turf are used to estimate the risk of cancer or developmental toxicity to soccer players using these fields. This screen only addresses the inhalation route of exposure. As mentioned above, since Dye et al. (2006) did not measure the metals content of inhalable particulates, this screen does not address the hazards posed by the inhalation of heavy metals such as lead." – **OEHHA** (2009)

"Based on the concentration of lead and the estimated amount of turf fibers ingested, the CPSC estimated daily ingestion amounts of around 0.1 µg per day (however, one older field was found to have ingestion levels of 9.9 µg per day). " - Consumer Product Safety Commission

"It should be noted that although one study discussed in this report did analyze the particulates in the air over these fields (Dye et al., 2006), the particulates were not analyzed for heavy metals, including lead. Therefore, there are no data with which to estimate the health risks from inhalation exposures to heavy metals emitted by these fields via airborne particulates." – **OEHHA** (2009)

31

CHILDREN AND CRUMB RUBBER EXPOSURE

Children, especially very young children, have many characteristics which make them vulnerable to environmental exposures. Children breathe more air per pound of body weight than adults in the same environment and physical activity adds an additional factor to exposure through inhalation.

Children also engage in hand-to-mouth behavior and very young children may eat nonfood items, such as rubber crumbs while on the fields. The protective keratinized layer of the skin is not as well developed in children and increases dermal absorption of COPCs as well as increasing evaporative loss of water on hot days. Children also have many more years to develop diseases with long latency periods after exposure.

32

To date, eleven human health risk assessments were identified that evaluated exposure to the constituents in crumb rubber.

In 2009 the New York City Department of Parks and Recreation decided that any new artificial fields they purchase must use a different material as its base, or infill layer. So has the Los Angeles Unified School District. "The health of our students is more important than any other issue," says LAUSD board member Marlene Canter, "You should never equate economics with health. In no way should we be skimping on something like this that could affect our kids." ("Cities Spurn Crumb Rubber in Artificial Fields")

SAN FRANCISCO AND EXPOSURE TO SBR TIRE CRUMB SYNTHETIC FIELDS

“Synthetic turf products are known to contain metals and volatile organic compounds (VOCs) that have potential for human health toxicity. Possible routes of exposure to chemicals are inhalation, ingestion, and skin absorption. VOCs are released into the air (called off-gassing)” (DEIR Initial Study page 25)

In regards to user exposures to particulates OEHHA wrote, (2009), “Data are needed for the amount of time athletes spend on artificial turf playing fields. Data are needed for a variety of sports, age groups, and for both men and women. Other subgroups with potentially heavy exposure to fields include coaches, referees, and maintenance workers.”

Additional heavy exposure risks include; specific sports positions, (soccer goalies, catchers), or passive users, (individuals sleeping or napping on field, neighbors living adjacent to fields).

Children find the warm tire crumb to be soothing and tend to place their face on the crumb. This exposes them to intimate doses of particles, dust, bacteria, and off gasses.

<http://www.youtube.com/watch?v=C3PkDHU7p70>

33

INHALATION & BACTERIAL EXPOSURE at San Francisco Playfields (South Sunset & Silver Terrace)



HAND TO MOUTH AND DERMAL EXPOSURE at San Francisco Playfields
(Kimball, Franklin Square, & Silver Terrace)



ALTERNATIVE 2: OFF-SITE ALTERNATIVE

In regards to the EIR whereby it states;

“construct similar renovations to athletic fields but at the West Sunset Playground instead of the Beach Chalet Athletic Fields.”(DEIR Page VI-7),

and “Under this alternative, it is assumed that all of the project components would be similar to those identified for the proposed project. The Off-Site Alternative would consist of replacing turf grass athletic fields at the West Sunset Playground with synthetic turf...”(DEIR Page VI-7).

It is our position that

- because the West Sunset Playground is a neighborhood park with close proximity to surrounding residences, unlike the Beach Chalet Fields,
- And because West Sunset Playground is directly adjacent to 4 public spaces of concern;
 - Sunset Elementary School,
 - A.P. Giannini Middle School,
 - St. Ignatius Prep School,
 - Sunset Health Center, (DPH)
- And because 2 pre-existing SBR infilled synthetic fields are located adjacent to the site creating a cumulative impact related to hazards and hazardous materials.
(St. Ignatius Prep School - J.B. Murphy Field and Gordon Practice Field)
- And because **Alternative 2: Off-Site Alternative** would entail the same hazardous materials and their by-products, (including but not limited to carbon black nanoparticles, heavy metals, and chemical ingredients,
- And because **Alternative 2: Off-Site Alternative** would entail the same Musco stadium lighting, it is our position that the impacts would be more significant than the proposed Beach Chalet Athletic Fields conversion.



This option entails a topic that was “screened out” from the Initial Study/NOP for the Beach Chalet EIR; “Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? (not applicable)” (Initial Study page 53)

It is our position that it IS applicable to Alternative 2: Off-Site Alternative.

Beach Chalet Renovation Alternative 2: Off-Site Alternative West Sunset Playground

**Sunset Health Center
(DPH)**

Sunset Elementary School

**AP Giannini
Middle School**



34
cont.

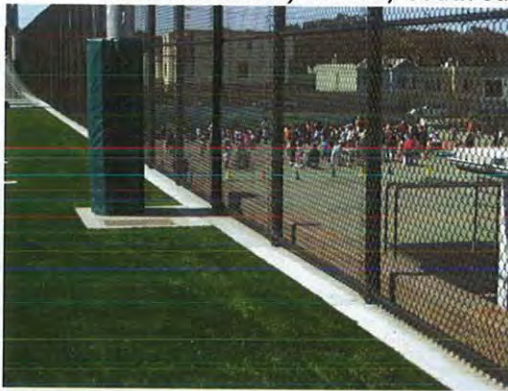
THE ALTERNATIVE 2: OFF-SITE ALTERNATIVE (continued)

The Alternative 2: Off-Site Alternative is just 5 blocks from a pre-existing multi-field synthetic turf installation, South Sunset Playfield. South Sunset Playfield is in the same neighborhood as West Sunset Playfield and is adjacent to Ulloa Elementary School and the South Sunset Senior Center.

(YouTube Video Clip <http://www.youtube.com/watch?v=8zsodulEmz0>)

Lobbyists for the City Fields Foundation and SF-RPD fought for and got an exemption from conducting an Environmental Impact Report for South Sunset Playfield. It is our position that because of the lack of an EIR, that classrooms at Ulloa Elementary School were exposed to SBR Tire Crumb and dust spilling into air conditioning intakes of some classrooms. Recommended mitigations to RPD, City Fields Foundation, and the Rec & Parks Commission were never implemented.

Ulloa Elementary School / South San Francisco (SBR Tire Crumb) Playfield



Classroom intake ducts



Intake ducts and drifts of SBR Tire Crumb

It is our position that the differences between the Beach Chalet project and "Alternative 2: Off-Site Alternative", as well as the City Fields Foundation's irresponsible history **requires a separate Environmental Impact Report for the "Alternative 2: Off-Site Alternative"**.

34
cont.

ALTERNATIVE 4: SYNTHETIC TURF WITHOUT LIGHTS ALTERNATIVE (DEIR page VI-5, VI-7)

Because Alternative 4 would entail the same hazardous materials and their by-products, (including but not limited to carbon black nanoparticles, heavy metals, and chemical ingredients), it is our position that the Hazards and hazardous materials impact would be equally significant as the Beach Chalet project and therefore should receive a rating of significant impact.

It is our position that the impacts that arise from the use of SBR crumb rubber and synthetic turf at the Beach Chalet project are applicable to any alternative project that utilizes SBR crumb rubber and synthetic turf.

35

ALTERNATIVES TO SBR TIRE CRUMB

If the final EIR should make mention of an alternative infill to SBR Tire Crumb, it should be noted that;

There are no affordable alternatives to SBR Tire Crumb that will realistically be used in the 9 acre Beach Chalet conversion. Since the 2008 Synthetic Fields Task Force; the City Fields Foundation and RPD have floated various red herrings, the most common being a combination of coconut fiber and cork, (corkanut).

Other touted infill materials that are too expensive, unrealistic, or unhealthy for various reasons include; Nike Grind Rubber, ethylene propylene diene monomer (EPDM), non-vulcanized thermoplastic elastomer (TPE), Elastomer-coated sand.

It is our opinion that these options will not be used and should not be offered by this EIR as a realistic possibility.

36

(DEIR page IV.E-14)

Impact Analysis

Impact RE-1: The project would not increase the use of existing neighborhood parks and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated and would not result in physical degradation of recreational resources. (Less than Significant)

Research into the health risks associated with playing in tire waste and its combination of chemicals and heavy metals is in its infancy. The general public is just beginning to learn of them.

It is our position that it is reasonable to believe that as the health issues associated with synthetic fields becomes more widely known, synthetic fields will become less desirable than grass fields, in which case the project **would** increase the use of existing neighborhood parks and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated and would result in physical degradation of recreational resources.

The synthetic fields would prohibit many activities that grass fields can accommodate. 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 Impact RE-1: should be changed to (Potentially Significant Impact).

37

Impact AE-3: Development of the proposed project would not create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area or that would substantially affect other people or properties. (Less than Significant) (DEIR page IV.B-12)

The stated opinions and the photoshop renderings in the DEIR do not constitute a photometric study, as was requested in the scoping portion of this EIR.

It is our position that the specific calculations should be included for the observed luminance glare effects that will be created by the scattering of light particles by coastal fog. The visual effects of the light pollution should include "discomfort glare", "disability glare", "light clutter", "light trespass", "skyglow", and "backdazzle". The scope of the neighborhoods affected should be comprehensive and not limited to direct line of sight. The effect on the safety of driving conditions of automobile traffic should be studied, (including but not limited to the Great Highway and La Playa Rd). It is our position that Impact AE-3 is a (Potentially Significant Impact).

The Great Highway and La Playa Rd have a direct line of site of the proposed complex that is 2 miles long.



Looking N towards site
(La Playa RD & the Great Highway)



Looking S towards site
(from Sutro Heights Park)



Queen Wilhelmina Windmill, (adjacent to Beach Chalet Field), from Sutro Heights Park