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Subj: 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).

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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.

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.

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.

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..

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.).

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!

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 Refugee 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

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 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.

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). .

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
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