

Building a healthy and sustainable global community for people and the plants and animals that accompany us on Earth

January 17, 2017

Angela Calvillo Clerk of the Board 1 Dr. Carlton B. Goodlett Place City Hall, Room 244 San Francisco, CA 94102-4689

## RE: APPEAL OF THE FINAL ENVIRONMENTAL IMPACT REPORT AND PROJECT APPROVAL FOR THE FOR THE SIGNIFICANT NATURAL RESOURCES AREA MANAGEMENT PLAN" (Case No. 2005.0912E)

Dear Ms. Calvillo:

The Wild Equity Institute and the Sierra Club's San Francisco Bay Chapter, the National Parks Conservation Association, Save the Frogs!, Golden Gate Audubon Society, Sequoia Audubon Society, and other interested individuals and organizations submit this appeal of the Final Environmental Impact Report ("FEIR") certified by the Planning Commission and approved by the Recreation and Parks Commission and for the Sharp Park Golf Course redevelopment project in the Significant Natural Resources Area Management Plan ("SNRAMP"), Case No. 2005.0912E.

San Francisco's Significant Natural Resource Areas Program was to be one of the great urban conservation programs in America. But in 2016, San Francisco released a Final Environmental Impact Report ("FEIR") for the Significant Natural Resource Area Management Plan ("SNRAMP") that will, if adopted, turn the program on its head.

The FEIR removes SNRAMP's original plan for Sharp Park's natural areas and replaces it with a project to redevelop Sharp Park Golf Course within the "recovery" area for two imperiled species, the San Francisco Garter Snake and the California Red-Legged Frog.



North America's Most Beautiful Serpent: the San Francisco Garter Snake



Twain's Frog: the California Red-legged Frog

Sharp Park Golf Course is arguably San Francisco's greatest economic and ecological mistake. It loses hundreds of thousands of dollars every year, taking money away from San Francisco's neighborhood parks and community centers. It kills two endangered species as it operates, and its location along California's coast means that before long it will be flooded by sea level rise: already several links have been washed out to sea.

In February 2006 the Recreation and Parks Department and the Planning Department began a California Environmental Quality Act ("CEQA") process for the Significant Natural Resource Areas Management Plan ("SNRAMP"). The SNRAMP proposed projects in the City's Natural Areas, including Sharp Park's Natural Areas, but did not propose any changes to Sharp Park Golf Course.



The original plan's management boundary (depicted by areas shaded in brown) was limited to the natural lagoon at Sharp Park. No modifications to the golf course were proposed. Environmental groups unanimously supported this plan.

Separately in 2009 the Recreation and Parks Department conceded to the demands of golf purists by releasing a controversial proposal to redevelop Sharp Park Golf Course. Known as "A18," the

proposal was heavily criticized by environmentalists, budget hawks, and Bay Area scientists, who stated:

"It is our conclusion that the minimal habitat enhancement proposed by the Park Department in their preferred 18-hole alternative is inadequate to allow the recovery of the San Francisco garter snake and red-legged frog at the site, and is set up to fail with climate change and sea-level rise."

When this criticism became public A18 appeared dead on arrival at City Hall. Indeed, shortly after A18 was criticized, the Recreation and Parks Department publicly stated:

"Because redesigning or eliminating the Sharp Park Golf Course is a separate proposal being studied by SFRPD, it will not be included or evaluated as part of the proposed [Significant Natural Areas Management Plan] project analyzed in the EIR. Should changes to the Sharp Park Golf Course be proposed, they would undergo a separate regulatory review, including CEQA environmental review."



Despite assurances that A18 (L) would never be inserted into the SNRAMP environmental review, the final EIR plan for Sharp Park (R) is indistinguishable from it.

Yet in November 2016 the Department released a SNRAMP FEIR that removed the original plan for Sharp Park and replaced it with A18, the Golf Course redevelopment project. Moreover, the FEIR declares the Golf Course an Historic Resource that CEQA must protect—even though the original design was washed away by ocean storms decades ago—and therefore refused to consider alternatives that would protect Sharp Park's environment from this controversial project.

Sharp Park, arguably San Francisco's most ecologically and biologically important natural area, would be devastated by implementation of A18, and in the seven years since A18 was first announced, many of the SNRAMP proposals for San Francisco's 31 other natural areas have moved forward or implemented, because they either didn't require environmental review or because they were incorporated into other park projects.

Nonetheless, to ensure that SNRAMP's good proposals for the City's other natural areas wouldn't be affected by the disastrous proposal for Sharp Park, Wild Equity and an array of environmental and community supporters demanded that the Sharp Park Golf Course redevelopment plan be segregated out of SNRAMP and its environmental review process, so the golf course project could stand or more likely, fall on its own merits. But these reasonable proposals have fallen on deaf ears. The Recreation and Parks Department has informed San Francisco's environmental community that we must sacrifice our most precious biological resource if we desire modest conservation gains in San Francisco's other natural landscapes.

Now Wild Equity, the Sierra Club, Surfrider Foundation, S.F. League of Conservation Voters, National Parks Conservation Association, Sequoia Audubon and others all agree: the environmental benefits proposed by SNRAMP in other areas are far outweighed by the environmental destruction the golf course bailout would cause at Sharp Park.

In 2009, the San Francisco Board of Supervisors unanimously passed an ordinance ordering RPD to study restoration alternatives at Sharp Park. The report RPD ultimately released contained a radical new golf course redevelopment plan for Sharp Park guised as a "recovery" effort for listed species (TetraTech 2009).

After scientists criticized the plan's several significant flaws (Davidson et al. 2011, pp. 1-2), the City convened the fact-finding Sharp Park Working Group (Holland 2011, p. 4-5). When the Working Group released findings that adopted many of (ESA-PWA 2011) recommendations,<sup>1</sup> RPD announced it would abandon a core element of its golf course redevelopment plan—armoring Sharp Park's seawall—but continued to insist that Sharp Park's 18-hole golf course would remain in its historic footprint, even as it acknowledged that sea level rise will erode the seawall and force it inland, squeezing endangered species habitats in a narrow area between the golf areas and the advancing ocean (Holland 2011, pp. 4-5).

Contemporaneously the City was preparing a Draft Environmental Impact Report ("DEIR") for the City's Significant Natural Resource Areas Management Plan ("SNRAMP").

However, when the DEIR was released in 2011 the PWA-based Laguna Salada plan had been replaced with the TetraTech golf course redevelopment plan.<sup>2</sup> This plan is now adopted in the FEIR. Under this plan, 60,000 cubic yards of material would be dredged from the Laguna Salada's wetland complex, creating 12,100,000 gallons of water storage capacity (RPD 2011, p. 99). Four golf links surrounding Laguna Salada would be raised by up to 3.5 feet, creating additional (although unquantified) water storage capacity in the lagoon system (TetraTech 2009, p. 43). Another link would be narrowed, and another removed<sup>3</sup> (RPD 2011, Figure 3). It also calls for

<sup>2</sup> The plan was attached to the DEIR as Appendix I, and will be referred to throughout this document as (TetraTech 2009) or (RPD 2011) interchangeably.

<sup>3</sup> Although Hole 12 will be removed at Sharp Park, the EIR requires the City to rebuild the link in another location at Sharp Park (RPD 2011, p. 28). The EIR proposes two locations for this link: west of Laguna

<sup>&</sup>lt;sup>1</sup> The penultimate draft of the Sharp Park Working Group's findings did not make any conclusion about Sharp Park Golf Course's integrity or compatibility with the site. However, shortly before its scheduled release, Dave Holland, then director of San Mateo County Parks, leaked a copy of the document to golf advocacy groups (Holland 2011, p. 1-3). These advocates demanded that Mr. Holland "insert something along the following line: 'None of the foregoing is incompatible with preservation of the historic 18 hole golf course that exits on the property.'" *Id.* Mr. Holland agreed to do so, and was able to insert a single line

filling ½ acre of Sharp Park's wetlands to create an island in Laguna Salada (RPD 2011, p. 99) and landfilling areas where California red-legged frogs breed to "prevent localized ponding" and "to allow more complete drainage to Laguna Salada" (RPD 2011, p. 377).

The FEIR's golf course redevelopment project is interrelated with ongoing wetland drainage at Sharp Park. Both are designed to reduce golf course flooding, and depend upon each other to implement this larger action. The City's larger plan to reduce golf course flooding is composed of (1) ensuring maximum pump rates are reliably achieved, (2) increasing water flow rates towards the pumps, (3) increasing water storage capacity by deepening lagoons and (4) increasing storage capacity by elevating the rim of the lagoon. If any one of these components fails or is not achieved, pumping rates will decrease and golf course areas will flood.

While there is some overlap, this project is primarily designed to accomplish the first and second elements of this plan, *see* (RPD, 2012, p. 6), while the EIR is primarily designed to implement the third and fourth elements of the plan. RPD 2011, p. 99. But the elements are expressly interlinked: the FEIR repeatedly states that the golf course redevelopment project is dependent on efficient pump operations (RPD 2011, pp. 146, 361, 374, 377), and further explains that the golf course redevelopment plan is designed to meet flood control objectives while reducing wear-and-tear on the pumps (TetraTech 2009, p. 43).

The City's statement that the golf course redevelopment plan is wholly separate from pumping operations (Wayne 2011b, p. 2) is belied by its recent permitting strategy discussion with other agencies (Anonymous 2012, p. 1). The agenda from this discussion indicates the pumping and the golf redevelopment project are two temporal phases of a single management strategy. Effects from the later phases are classic indirect effects, because they are caused by the proposed action and are later in time, but still reasonably certain to occur. They also derive, either directly or indirectly from an interrelated element of the City's larger flood management strategy. In either case, by law the City must review these effects during this CEQA process, regardless of the City's colloquial assertion that the projects are separate.

The City's proposal has already been approved by several oversight bodies, and in each case the City made clear that it would not review or consider restoration alternatives at Sharp Park. The City's single-minded approach to Sharp Park and its completion of many steps in its approval process show that the golf course redevelopment project is reasonably certain to occur.

The City's proposal to rebuild Sharp Park Golf Course's original layout was endorsed by San Francisco's Recreation and Parks Commission in December of 2009, to the exclusion of all other options for Sharp Park's future (RPD 2011, p. 2). In the SNRAMP EIR, the City concluded that only an 18-hole Golf Course at Sharp Park was a feasible alternative for the property, and refused to consider other restoration options that would provide additional benefits to listed species (RPD 2011, p. 3). Moreover, the EIR contains a mitigation requirement that will force the City to rebuild

Salada, between the seawall and frog breeding areas, or east of Highway 1. The EIR suggests that surrounding Laguna Salada with golf links would have fewer significant impacts because it would retain historic integrity of the golf course, even thought it would negatively affect wildlife and intrude on protected natural areas. However, the EIR defers the ultimate decision to subsequent environmental review.

a golf link in one of two places in subsequent environmental review (RPD 2011, p. 28). Thus, the City's existing approvals and contemporaneous permitting procedures create a binding requirement to implement the golf course redevelopment plan.

Furthermore, when the San Francisco Board of Supervisors passed an ordinance requiring the City to negotiate with the National Park Service to implement a restoration plan for the property, the Mayor vetoed the ordinance, (Lee 2011, p. 1), again indicating the City's intent to ensure the golf course redevelopment project occurs. And with the City's encouragement, San Mateo County passed a resolution calling for San Francisco to "maximize recreation opportunities" at Sharp Park by implementing the golf course redevelopment plan (San Mateo Co. 2011, p. 2).

These actions by the City are all that is necessary to show that the golf course redevelopment plan is reasonably certain to occur. While there may be some ambiguity about how the ultimate Golf Course design will turn out, the City's CEQA documents must give consideration of the effects of interrelated and interdependent activities whether or not all of the activities' impact is known.

Now the plan has added mitigation measures dealing with acidic soils that were not present in the 2011 DEIR released for public review. For example, M-BI-6a has been modified extensively to add several pages of mitigation related to acid sulfate and anoxic conditions during dredging. None of this has been available for public review during the public comment process for this CEQA process. When such large changes are made, recirculation is required. *See Friends of the College of San Mateo Gardens v. San Mateo County Community College District*, (2016) 1 Cal. 5th 937.

In addition, the FEIR fails to adequately analyze how mitigation measures at Sharp Park will impact the San Francisco garter snake as a fully protected species pursuant to Fish & G. Code § 5050, subd. (b)(1) in light of the holding in *Center for Biological Diversity v. California Department of Fish and Wildlife* (2015) 62 Cal.4th 204. Here, the Court recognized that fully protected species are subject to stricter prohibitions than provided under the Endangered Species Act, including an express prohibition on taking or possessing a fully protected species as mitigation for a project under CEQA. The FEIR is in violation of this holding, because it's proposal to redevelop Sharp Park Golf Course is mitigated with several provisions that expressly demonstrate "take" of the San Francisco garter snake. For example, the project explains that "Impacts to San Francisco garter snakes could occur from construction activities involving vehicle traffic and the use of heavy equipment which could result in direct mortality of individuals," DEIR p. 322, and then explains that mitigation measure M-BI-6a specifically requires "an on-call specialty environmental monitor with a valid 10(a)(1)(A) permit to handle San Francisco garter snakes and relocate them." DEIR p. 323. This is simply not permissible under CEQA after *Center for Biological Diversity v. California Department of Fish and Wildlife.* 

The FEIR does not comply with San Francisco's Sea Level Rise Action Plan, released in March of 2016. The Action Plan requires San Francisco to consider adaptation and retreat alternatives where lands are at risk from expected sea level rise impacts. While the FEIR recognizes that Sharp Park is one of two natural areas at risk from expected sea level rise impacts, it fails to consider any alternative that would protect Sharp Park's natural ecology from salinity intrusion or other impacts from sea level rise. This violates CEQA and San Francisco's own plans for sea level rise adaptation.

The FEIR selectively excludes alternatives without substantial evidence or sound logic. In a case like this where public concern and controversy is high, evidence of alternatives is widespread, and when massive take has occurred under existing protocols, the City cannot ensure that there will be no significant adverse environmental impacts without at least considering alternatives to the golf course redevelopment project.

In particular, (ESA-PWA 2011) contributed a restoration model for Sharp Park that is based on the best scientific data available at Sharp Park and addresses all of the above deficiencies in the project. For example, where the project suggests that both species are "conservation reliant" due to their isolation, the ESA-PWA proposal emphasizes connective habitat corridors across Sharp Park.

Where the project suggests it will continue to drain and fertilize Sharp Park's wetlands on the one hand, and then dredge excessive tule and cattail growth on the other, PWA-ESA's mitigation model constrains pumping so that water levels will rise high enough to drown excessive vegetation growth, and ensures that water levels rise and fall slowly so that Sharp Park's entire wetland feature remains hydrologically connected and contains sufficient water for egg masses to develop into adult frogs.

Where the project ignores the fundamental changes climate change will bring to this landscape, ESA-PWA's plan provides mitigation and recovery areas upland and inland from areas that will be immediately impacted by catastrophic flooding events, and then creates natural defenses around these areas by restoring wetlands and vegetative features between the rising sea and the restored habitats. These features will absorb and slow the rate of water if intrusion ever does occur.

Where the project blames the frog for an apparently indiscriminant breeding behavior and for laying eggs in 'unsustainable' habitats, ESA-PWA's mitigation and restoration plan recognizes that the California red-legged frog can successfully breed under natural conditions at Sharp Park, so long as the velocity, rapidity, and scope of the wetland draining project implemented by San Francisco is curtailed.

All of these outcomes would provide greater conservation and public benefits than the project disclosed in the notification, yet the City does not seem prepared to consider alternatives to the project proposal. Such reluctance is inconsistent with sound environmental review and the strictures of CEQA.

The City's rationale for rejecting the full restoration alternative based on possible impacts to historic resources associated with the golf course is not supported by substantial evidence or law. This is particularly true because RPD's internal communications demonstrate that under its golf course redevelopment project:

- "Sea level rise will reduce the capacity of sharp park to function as a freshwater wetland that will support frogs and snakes"
- "Based on most conservative predictions of sea level rise, the majority of sharp park west of highway 1 will not support freshwater wetlands in the long term"
- "The wetland complex at sharp park is not expected to provide habitat in perpetuity."

(Wayne, 2009). Yet the impacts caused by the redevelopment project are deemed of less import in the FEIR compared to maintaining a golf course on the property.

This conclusion is internally inconsistent with the FEIR. The FEIR makes clear that the only mitigation measure necessary for changes to the golf course are to document the golf course's landscape before changes—including the elimination of holes or links—are made. M-CP-7. Thus there is no limitation within the FEIR's own logic to exclude these other alternatives, and they must be considered by the City.

This letter and its references, along with all other documents submitted into the record for this project or related Sharp Park projects are incorporated herein by reference.

Sincerely,

Brent Plati

**Brent Plater** 



and the plants and animals that accompany us on Earth

Dear San Francisco Board of Supervisors,

Wild Equity is now, and has always been, a strong supporter of the City's Natural Areas and its Natural Areas Program. We believe that the preservation of San Francisco's Natural Areas is among the most pressing conservation issues of our time.

However, we have grave concerns about the California Environmental Quality Act ("CEQA") review process for the Significant Natural Resource Areas Management Plan ("SNRAMP"). Indeed, we have consistently and repeatedly objected to the City's decision to insert a project known as "A18," the Sharp Park Golf Course redevelopment project, into the SNRAMP EIR process.

To date you have not taken any action to address this concern. This is perplexing, as our request is entirely consistent with the City's November 2009 Scoping Report for the SNRAMP CEQA process, which stated:

[b]ecause redesigning or eliminating the Sharp Park Golf Course is a separate proposal being studied by SFRPD, it will not be included or evaluated as part of the proposed SNRAMP project analyzed in the EIR. Should changes to the Sharp Park Golf Course be proposed, they would undergo a separate regulatory review, including CEQA environmental review.

We write today to reiterate that unless all Sharp Park Golf Course redevelopment projects and management proposals derived from A18 are removed from the SNRAMP CEQA process, Wild Equity will oppose SNRAMP's approval. In contrast, if the City were to revert to the original SNRAMP project for Sharp Park—i.e., the project proposed in the 2006 Final Draft SNRAMP—Wild Equity will strongly support SNRAMP's adoption.

We have reached this conclusion after carefully weighing the SNRAMP's conservation benefits against the environmental harm that will be wrought by A18. It is clear that the proposed conservation benefits SRNAMP may bring to the City's other natural areas are greatly outweighed by the concrete harms that A18 will impose on Sharp Park.

A18 has been heavily criticized by scientists, conservation groups, and community park advocates in both 2009 and 2011 because of its harmful impacts on imperiled wildlife and the economic sustainability of the Recreation and Park Department. Wild Equity is not willing to sacrifice Sharp Park, unquestionably the Recreation and Park Department's most ecologically and biologically important natural area, to this ill-conceived project for a vague promise of conservation benefits in other areas. Yet this is what SNRAMP DEIR's preferred alternative currently offers.

We therefore reiterate that we will oppose adoption of the SNRAMP DEIR unless all Sharp Park Golf Course redevelopment projects and management proposals derived from A18 are removed from the SNRAMP CEQA process.

Sincerely,

Brint Plati

Brent Plater



Surfrider Foundation, San Francisco Chapter 3830 Noriega St. San Francisco, Ca 94122

11/20/14

Dear San Francisco Board of Supervisors,

The mission of the San Francisco Chapter of Surfrider Foundation includes the preservation and enhancement of San Francisco's natural coastline.

We are writing to the Board to relay our grave concerns about the California Environmental Quality Act ("CEQA") review process for the City's Significant Natural Resource Areas Management Plan ("SNRMAMP"). Specifically, we take issue with project known as "A18," the Sharp Park Golf Course redevelopment project, which is presently included into the SNRAMP EIR process.

Sharp Park golf course, while being an affordable recreational amenity to the public, also happens to be located on a coastal wetland. The preservation of the course layout relies upon the maintenance of a sea wall on the beach. The seawall prevents waves from filling the lagoon and thereby flooding the links. The problem is Pacifica has already lost most of its beach area to seawalls and rock revetments. In our view, to promote further beach loss in Pacifica (by continuing to invest in the operation of the golf course) is bad environmental policy. Coastal wetlands and lagoons such as the one at Sharp Park help purify water, and bring sand to our eroding beaches. Furthermore, our allies in the environmental community are correct in claiming that the golf course negatively impacts endangered species (San Francisco Gartner snake and Ca red legged-frogs).

We write today to ask for the removal of the Sharp Park Golf Course redevelopment projects and management proposals (derived from A18) from the SNRAMP CEQA process. Coastal wetlands and beaches are significant natural areas. Wherever we have a chance to restore or protect them, we should embrace the opportunity. Thank you.

Sincerely,

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Bill McLaughlin Surfrider Foundation, San Francisco Chapter Restore Sharp Park Campaign Lead



# San Francisco Bay Chapter

Serving Alameda, Contra Costa, Marin and San Francisco Counties

July 22, 2014

John Rahaim, Director and Planning Commissioners San Francisco Planning Department 1650 Mission St #400 San Francisco, CA 94103

Re: Sharp Park and the Significant Natural Resource Areas Management Plan (SNRAMP) EIR

Dear Director Rahaim and Planning Commissioners:

The Sierra Club again urges you to remove from the SNRAMP CEQA process all Sharp Park Golf Course redevelopment projects and management proposals that are a part of project A18, the Sharp Park Golf Course redevelopment project. If the SNRAMP EIR is adopted with these elements the Sierra Club will have no choice but to oppose this EIR since it will violate CEQA and put endangered species (the San Francisco garter snake and the California red-legged frog) at risk.

We would do this with great reluctance since we are strong supporters of the San Francisco Natural Areas Program and wish to see it implemented as fully as possible. Unfortunately, project A18 would undermine the goals of the Natural Areas Program at Sharp Park since, as said above, it would impact endangered species and addresses a golf redevelopment project, not a natural areas project.

It is obvious to us that project A18 requires a distinct and separate CEQA process, not as a part of the SNRAMP EIR. We have made our concerns well known to you, as we have previously objected to inserting A18, into the California Environmental Quality Act ("CEQA") review process for the Significant Natural Resource Areas Management Plan ("SNRMAMP").

Your own analysis supports our position. The City's November 2009 Scoping Report for the SNRAMP CEQA process stated:

[b]ecause redesigning or eliminating the Sharp Park Golf Course is a separate proposal being studied by SFRPD, it will not be included or evaluated as part of the proposed SNRAMP project analyzed in the EIR. Should changes to the Sharp Park Golf Course be proposed, they would undergo a separate regulatory review, including CEQA environmental review.

Furthermore, the Sharp Park Golf Course redevelopment project, in contrast to the "program" level analysis of SNRAMP part of the DEIR, is analyzed at the "project" level and would therefore not require additional CEQA review before it is implemented even though it was not subject to all of CEQA's required review procedures and not a single alternative to A18 was considered in the DEIR.

A18 has been heavily criticized by scientists, conservation groups, and community park advocates in both 2009 and 2011 because of its harmful impacts on imperiled wildlife and the economic sustainability of the Recreation and Park Department.

While we strongly believe that the Natural Areas Program is critical to the future of San Francisco and its natural ecology, we do not believe it is appropriate or ethical for the City to attempt to seek acceptance of an environmentally disastrous project by inappropriately injecting it into the CEQA process of an otherwise strongly supported program.

We therefore reiterate that we will oppose adoption of the SNRAMP DEIR unless all Sharp Park Golf Course redevelopment projects and management proposals derived from A18 are removed from the SNRAMP CEQA process.

Sinceret Arthur Feinstei

Conservation Chair

Cc: San Francisco Board of Supervisors



San Francisco Tomorrow

Since 1970, Working to Protect the Urban Environment

September 17, 2014

John Rahaim, Director and Planning Commissioners San Francisco Planning Department 1650 Mission St #400 San Francisco, CA 94103

## Re: Sharp Park and the Significant Natural Resource Areas Management Plan (SNRAMP) EIR

Dear Director Rahaim and Planning Commissioners:

San Francisco Tomorrow's goal of having a livable, sustainable and environmentally healthy city depends in great part upon the City employing a transparent and lawful planning process. Sadly, the present SNRAMP DEIR fails both tests.

The unjustified inclusion of project A18, the Sharp Park Golf Course redevelopment project, in the SNRAMP EIR clearly violates CEQA. We believe it obvious that project A18 requires a distinct and separate CEQA process since project A18 does not address a Natural Area project and, in fact, addresses a golf course project.

Your own analysis supports our position. The City's November 2009 Scoping Report for the SNRAMP CEQA process stated:

[b]ecause redesigning or eliminating the Sharp Park Golf Course is a separate proposal being studied by SFRPD, it will not be included or evaluated as part of the proposed SNRAMP project analyzed in the EIR. Should changes to the Sharp Park Golf Course be proposed, they would undergo a separate regulatory review, including CEQA environmental review.

SFT urges you to comply with the law and your department's own position and remove from the SNRAMP EIR process all Sharp Park Golf Course redevelopment projects and management proposals. Otherwise, SFT will have no choice but to oppose this EIR since it will violate CEQA and put endangered species (the San Francisco garter snake and the California red-legged frog) at risk.

We want to emphasize that SFT strongly supports the City's Natural Areas Program and considers it a landmark and essential component of the City's General Plan. All the more reason to not jeopardize the integrity of the Natural Areas Program, and the City's planning process itself, which would be the

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44 Woodland Ave (415) 585-9489 San Francisco, CA 94117

result of the City's attempt to attach an inappropriate project into an otherwise strongly supported program seemingly to make it easier for that controversial project to get adopted. Please remove Project A18 from the SNRAMP EIR.

Sincerely,

Jerf Cy

Jennifer Clary President

cc: San Francisco Board of Supervisors



Clerk, San Francisco Board of Supervisors 1 Dr. Carlton B. Goodlett Place City Hall, Room 244 San Francisco, CA 94102-4689 July 15, 2014

# **RE:** TENTATIVE OPPOSITION TO THE SIGNIFICANT NATURAL RESOURCE AREAS MANAGEMENT PLAN

Dear Clerk of the Board:

The San Francisco League of Conservation Voters (SFLCV) is now, and has always been, a strong supporter of the City's Natural Areas and its Natural Areas Program. We believe that the preservation of San Francisco's Natural Areas is among the most pressing conservation issues of our time.

However, we have grave concerns about the California Environmental Quality Act (CEQA) review process for the Significant Natural Resource Areas Management Plan (SNRMAMP). Indeed, we have consistently and repeatedly objected to the City's decision to insert a project known as "A18," the Sharp Park Golf Course redevelopment project, into the SNRAMP EIR process.

To date you have not taken any action to address this concern. This is perplexing, as our request is entirely consistent with the City's November 2009 Scoping Report for the SNRAMP CEQA process, which stated:

[b]ecause redesigning or eliminating the Sharp Park Golf Course is a separate proposal being studied by SFRPD, it will not be included or evaluated as part of the proposed SNRAMP project analyzed in the EIR. Should changes to the Sharp Park Golf Course be proposed, they would undergo a separate regulatory review, including CEQA environmental review.

We write today to reiterate that unless all Sharp Park Golf Course redevelopment projects and management proposals derived from A18 are removed from the SNRAMP CEQA process, SFLCV will oppose SNRAMP's approval. In contrast, if the City were to revert to the original SNRAMP project for Sharp Park—i.e., the project proposed in the 2006 Final Draft SNRAMP—the SFLCV will strongly support SNRAMP's adoption.

We have reached this conclusion after carefully weighing the SNRAMP's conservation benefits against the environmental harm that will be wrought by A18. It is clear that the

proposed conservation benefits SRNAMP may bring to the City's other natural areas are greatly outweighed by the concrete harms that A18 will impose on Sharp Park.

A18 has been heavily criticized by scientists, conservation groups, and community park advocates in both 2009 and 2011 because of its harmful impacts on imperiled wildlife and the economic sustainability of the Recreation and Park Department. The SFLCV is not willing to sacrifice Sharp Park, unquestionably the Recreation and Park Department's most ecologically and biologically important natural area, to this ill-conceived project for a vague promise of conservation benefits in other areas. Yet this is what SNRAMP DEIR's preferred alternative currently offers.

We therefore reiterate that we will oppose adoption of the SNRAMP DEIR unless all Sharp Park Golf Course redevelopment projects and management proposals derived from A18 are removed from the SNRAMP CEQA process.

Sincerely yours,

Amandeep Jawa, President San Francisco League of Conservation Voters



July 29, 2014

To Whom It May Concern:

Resolution to remove the Sharp Park Golf Course Design Project (Alternative A18) from the Environmental Impact Report for the San Francisco Recreation and Park Department's Significant Natural Resource Areas Management Plan, and to oppose any final SNRAMP EIR that contains such proposals.

WHEREAS, the two-fold mission of the Recreation and Park Department's Natural Areas Program (NAP) is to "preserve, restore, and enhance remnant Natural Areas, and to develop and support community-based site stewardship of these areas"; and

WHEREAS, the Significant Natural Resource Areas Management Plan (SNRAMP) is intended to guide management activities and site improvements in Natural Areas by the Recreation and Park Department for the next 20 years; and

WHEREAS, one of these natural areas, Sharp Park, has significantly different ecological and administrative issues because it is the only Natural Area that contains the endangered San Francisco garter snake and the threatened California red-legged frog, and is the only Natural Area located outside of San Francisco county; and

WHEREAS, the planning process for the SNRAMP began in 1995 and has included the input of multiple stakeholders including a Citizen Task Force and Green Ribbon Panel in 2002, a Citizens Advisory Committee in 2003, an ad hoc working group in 2004, and three independent scientific peer reviews and a public comment period on the 2005 public draft; and

WHEREAS, the SNRAMP Final Draft Plan was approved for environmental review in 2006 and has completed several steps in the California Environmental Quality Act (CEQA) review process, including the publication of a Notice of Preparation, distribution of an Initial Study, the conclusion of public scoping and comment periods, and the publication of a final Scoping Report by November of 2009; and WHEREAS, Alternative A18, a conceptual alternative to redesign Sharp Park Golf Course, was separately proposed by the Recreation and Park Department in November 2009; and

WHEREAS, Alternative A18 did not complete several CEQA procedural requirements, including a discussion of Alternative A18 in a Notice of Preparation and Initial Study; review by or consultation with Responsible Agencies; or formal public comment and review of draft golf course designs; and

WHEREAS, Alternative A18 was heavily criticized by scientists, conservation groups, and community park advocates because of its harmful impacts on imperiled wildlife and the economic sustainability of the Recreation and Park Department;

WHEREAS, in the November 2009 Scoping Report for the SNRAMP CEQA process, the Recreation and Park Department and the Planning Department jointly stated that "because redesigning or eliminating the Sharp Park Golf Course is a separate proposal being studied by SFRPD, it will not be included or evaluated as part of the proposed SNRAMP project analyzed in the EIR. Should changes to the Sharp Park Golf Course be proposed, they would undergo a separate regulatory review, including CEQA environmental review;" and

WHEREAS, Alternative A18 was nonetheless inserted into the long-standing SNRAMP CEQA review process as a new, additional SNRAMP project when the SNRAMP DEIR was released in August 2011; and

WHEREAS, Sharp Park is the only Natural Area that the DEIR studies at the project-level, which means Alternative A18 will have completed its entire CEQA requirements if the SNRAMP DEIR is adopted as final, while the City's 31 other Natural Areas will require subsequent, project-specific environmental review before their proposed projects are implemented;

WHEREAS, with the exception of Alternative A18, all feasible alternative management regimes for Sharp Park were excluded from consideration in the DEIR because it characterizes the golf course as an historic resource for purposes of CEQA, despite the San Francisco Historic Preservation Commission's contrary determination; and

WHEREAS, Alternative A18 should be subject to a separate and complete environmental evaluation;

NOW, THEREFORE BE IT RESOLVED that the Board of Directors of Sequoia Audubon supports removing all Sharp Park Golf Course projects and management proposals derived from Alternative A18 from the SNRAMP EIR process, and if they are not so removed, Sequoia Audubon will oppose passage of the SNRAMP EIR.

Sincerely,

D. Cossins

Sue Cossins Administrative Assistant For the Sequoia Audubon Society Board of Directors

San Francisco Board of Supervisors 1 Dr. Carlton B. Goodlett Place, City Hall, Room 244 San Francisco, CA 94102-4689

Dear Board of Supervisors,

I am writing to inform you that unless all Sharp Park Golf Course redevelopment projects and management proposals derived from A18 are removed from the SNRAMP CEQA process, SAVE THE FROGS! will oppose SNRAMP's approval. We have reached this conclusion after carefully weighing the SNRAMP's conservation benefits against the environmental harm that will be wrought by A18. It is clear that the proposed conservation benefits SRNAMP may bring to the City's other natural areas are greatly outweighed by the concrete harms that A18 will impose on Sharp Park's amphibians.

This conclusion is based on, among other considerations, (a) the fact that the natural areas program, which we support in principle, already has authority to implement the DEIR's proposed conservation projects in most of the City's natural areas, and therefore adopting the SNRAMP DEIR as currently proposed will provide no additional conservation benefit to these areas; (b) the few areas were additional conservation gains would be authorized are analyzed only at the "program" level, which means some subsequent, significant environmental review document will be required before those projects move forward, making those projects subject to further delay, expense, and uncertainty; and (c) the Sharp Park Golf Course redevelopment project, in contrast, is analyzed at the "project" level and would therefore not require additional CEQA review before it is implemented: and yet A18 was not subject to all of CEQA's required review procedures and not a single alternative to A18 was considered in the DEIR.

A18 has been heavily criticized by scientists, conservation groups, and community park advocates in both 2009 and 2011 because of its harmful impacts on imperiled wildlife and the economic sustainability of the Recreation and Park Department. SAVE THE FROGS! is not willing to sacrifice Sharp Park, unquestionably the Recreation and Park Department's most ecologically and biologically important natural area, to this ill-conceived project for a vague promise of conservation benefits in other areas. Yet this is what SNRAMP DEIR's preferred alternative currently offers. The vast majority of California's wetlands have been destroyed; Sharp Park is home to federally protected, endangered California Red-Legged Frogs (*Rana draytonii*), an iconic amphibian that the Board of Supervisors should work to protect, rather than to kill, harm and harass, which is what happens when the City pumps the Sharp Park Wetlands out to sea and their egg masses get stranded on dry land.

I therefore reiterate that SAVE THE FROGS! will oppose adoption of the SNRAMP DEIR unless all Sharp Park Golf Course redevelopment projects and management proposals derived from A18 are removed from the SNRAMP CEQA process. Sincerely,

Kerry Kriger

Dr. Kerry Kriger

15-June-2014



Dr. Kerry Kriger2524 San Pablo AvenueExecutive DirectorBerkeley, CA 94702 USA831-621-6215E-mail: kerry@savethefrogs.comSavetheffogs\_Com



August 13, 2014

Phil Ginsburg General Manager San Francisco Recreation and Park Department McLaren Lodge-Golden Gate Park 501 Stanyan St. San Francisco, CA 94117

# **Re: Significant Natural Resource Areas Management Plan**

Dear General Manager Ginsburg,

The National Parks Conservation Association (NPCA) has been and continues to be a supporter of the City's Natural Areas and its Natural Areas Program, which is one component of a larger conservation strategy in the Bay Area that includes city, state and federal parks.

However, we have grave concerns about the California Environmental Quality Act ("CEQA") review process for the Significant Natural Resource Areas Management Plan ("SNRAMP"). Indeed, we have consistently and repeatedly objected to the City's decision to insert a project known as "A18," the Sharp Park Golf Course redevelopment project, into the SNRAMP EIR process.

To date, the City has not taken any action to address this concern. This is perplexing, as our request is entirely consistent with the City's November 2009 Scoping Report for the SNRAMP CEQA process, which stated:

[b]ecause redesigning or eliminating the Sharp Park Golf Course is a separate proposal being studied by SFRPD, it will not be included or evaluated as part of the proposed SNRAMP project analyzed in the EIR. Should changes to the Sharp Park Golf Course be proposed, they would undergo a separate regulatory review, including CEQA environmental review.

We write today to reiterate that unless all Sharp Park Golf Course redevelopment projects and management proposals derived from A18 are removed from the SNRAMP CEQA process the NPCA will oppose SNRAMP's approval. In contrast, if the City were to revert to the original SNRAMP project for Sharp Park—i.e., the project proposed in the 2006 Final Draft SNRAMP—the NPCA will strongly support SNRAMP's adoption.

We have reached this conclusion after carefully weighing the SNRAMP's conservation benefits against the environmental harm that will be wrought by A18. It is clear that the proposed conservation benefits SRNAMP may bring to the City's other natural areas are greatly outweighed by the concrete harms that A18 will impose on Sharp Park.

This conclusion is based on, among other considerations, (a) the fact that the natural areas program, already has authority to implement the DEIR's proposed conservation projects in most of the City's natural areas, and therefore adopting the SNRAMP DEIR as currently proposed will provide no additional conservation benefit to these areas; (b) the few areas were additional conservation gains would be authorized are analyzed only at the "program" level, which means some subsequent, significant environmental review document will be required before those projects move forward, making those projects subject to further delay, expense, and uncertainty; and (c) the Sharp Park Golf Course redevelopment project, in contrast, is analyzed at the "project" level and would therefore not require additional CEQA review before it is implemented: and yet A18 was not subject to all of CEQA's required review procedures and not a single alternative to A18 was considered in the DEIR.

A18 has been heavily criticized by scientists, conservation groups, and community park advocates in both 2009 and 2011 because of its harmful impacts on imperiled wildlife and the economic sustainability of the Recreation and Park Department. NPCA is not willing to sacrifice Sharp Park, unquestionably the Recreation and Park Department's most ecologically and biologically important natural area, to this ill-conceived project for a vague promise of conservation benefits in other areas. Yet this is what SNRAMP DEIR's preferred alternative currently offers.

We therefore reiterate that we will oppose adoption of the SNRAMP DEIR unless all Sharp Park Golf Course redevelopment projects and management proposals derived from A18 are removed from the SNRAMP CEQA process.

Sincerely,

Neal Desai

Neal Desai Pacific Region Field Director National Parks Conservation Association



inspiring people to protect Bay Area birds since 1917

April 10, 2015

Phil Ginsburg, General Manager San Francisco Park & Recreation Department 501 Stanyan Street San Francisco, CA 94117

Dear Mr. Ginsburg:

Golden Gate Audubon would like to reiterate its opposition to elements of Sharp Park development and management which have been included in the Significant Natural Resources Areas Management Plan (SNRAMP) and the associated SNRAMP Environmental Impact Review (EIR). We urge you to move forward with the excellent protection and programs under the SNRAMP for the originally indicated natural areas in the city, but urge you to remove the Sharp Park elements (Alternative A18) which merit further intensive review and vetting, as outlined below.

The SNRAMP is designed to guide management activities and improvement of dozens of important city-owned properties in San Francisco that include critical habitat fragments and special species. For decades, SNRAMP has been envisioned and developed with thoughtful guidance from many stakeholders, including SF RPD and the conservation community. However, the rather late inclusion of Alternative A18 (Sharp Park) has severely compromised what would otherwise be unambiguously strong support of the environmental community for SNRAMP.

Why Sharp Park is different and does not belong in SRNAMP:

- Sharp Park is not within the City and County limits of San Francisco and this area's management has repercussions for contiguous habitat parcels of other jurisdictions, who have not participated in review processes to date.
- Alternative A18 is primarily concerned with sustaining an artificial amenity: a golf course, rather than effectively managing for a coastal wetland ecosystem. As the operation the golf course is not consistent with the purpose of SNRAMP, including Sharp Park undermines SNRAMP's integrity.
- Sharp Park is the only parcel in SNRAMP EIR known to host native *vertebrate* species which are federally-listed under the Endangered Species Act. Two resident native vertebrate species: the threatened California Red-legged Frog and the endangered San Francisco Garter Snake are well known to be

### **GOLDEN GATE AUDUBON SOCIETY**

2530 San Pablo Avenue, Suite G, Berkeley, CA 94702 phone 510.843.2222 web www.goldengateaudubon.org experiencing perilous rates of decline throughout their ranges. The San Francisco Garter Snake has a quite limited and fragmented range due, in part, to the unfortunate history of draining coastal wetlands. Sharp Park is one of very few places where the San Francisco Garter Snake's survival as a species could be achieved with substantive focus on coastal wetland ecology. Sharp Park merits its own independent CEQA review for its unique conservation importance but also for the opportunity this San Mateo County property offers as a unique venue for the public to discover coastal wetland ecology and see rare animals. It would be shameful, and ironic, to say the least, if it were the City of San Francisco that effectively signed the death warrant for the beautiful snake sharing its namesake - by inadequately preserving habitat which serves as this particular endangered species last stronghold on Earth -- under the umbrella of a Significant Natural Resource Areas Management Plan EIR.

- Although SNRAMP planning has taken place since 1995, the Sharp Park Alternative A18 was not formally included until after 2009. As such, it has not received anything like equal or adequate environmental and public review.
- Because the project elements at Sharp Park have not been properly studied nor sufficiently vetted by all relevant stakeholders, it should not be approved without separate review and public input. Yet, adoption of the final DEIR could effectively fast track the implementation of irreversible destructive management practices at Sharp Park simply because A18 is considered at the Project Level. While the 31 other projects are only approved at the program level, each of those 31 other projects have received more careful review than A18. It suggests that the City's late inclusion of Alternative A18 effectively circumvented a truly comprehensive review process under CEQA for Sharp Park projects. This rightly raises suspicion among the environmental community and has invoked opposition to SNRAMP that would not exist if Option A18 were simply removed from the SNRAMP EIR.
- Because Sharp Park is managed primarily as a golf course, it is not in fact being managed as a natural resource area. Therefore, it does not, by definition, belong to the collection of properties contemplated by the SNRAMP EIR. Furthermore, the water buttressing impacts, severe draining regimens, and vegetation removal required for artificially sustaining the golf course are deeply disruptive for a coastal wetland ecosystem and compromise crucial habitat for the San Francisco Garter Snake and the Red-Legged Frog.

Given the many concerns (presence of federally listed species, insufficiency in time, and substance and scope of review, mismatched management objectives for that property, and a divided conservation community, we urge you to REMOVE Sharp Park Alternative A18 from the SNRAMP-EIR. Doing so, will enable the City to earn back strong support from the conservation community for the rest of the projects contemplated under SNRAMP.

Our concerns about the A18 project element had been lodged separately, earlier, during the appropriate comment period. However, by insisting on the inappropriate inclusion of A18, the City has unwittingly broadened and strengthened opposition to SNRAMP and the entire Natural Areas Program. Without Alternative A18, SNRAMP may be deemed the most thoughtful and powerful urban conservation initiative anywhere in the world. Yet, the misguided inclusion of A18 undermines the integrity of SNRAMP and alienates support from environmental organizations that would otherwise be its champions. We urge you to remove A18.

Sincerely Yours,

endo

Cindy Margulis, Executive Director

CC: San Francisco Mayor Ed Lee SF Board of Supervisors



inspiring people to protect Bay Area birds since 1917

#### December 12, 2016

Mark Buell, Commission President Recreation and Parks Commission Recpark.Commission@sfgov.org

Rodney Fong, Commission President Planning Commission Commissions.Secretary@sfgov.org

## **RE: Natural Areas Program EIR**

Dear Commissioners:

Our thousands of Audubon members enjoy birdwatching, wildlife viewing, nature study, ecology, citizen science, volunteering, habitat restoration, stewardship, etc. — all opportunities that the Natural Areas Program offers. For 15 years, SNRAMP has been envisioned and developed to protect natural areas within the city and make them accessible to people. SNRAMP is meant to guide management activities that will improve dozens of important San Francisco properties that include critical habitat fragments, special native species, and even critically endangered species.

While most of the city landscape is concrete, buildings, roads, and other urban development, the Recreation and Park Department manages approximately 230 parks of various sizes, totaling about 3,500 acres. Only 1,100 acres confined to 31 of these parks are deemed to contain *significant natural areas*, which are the unique natural heritage of San Francisco. This is less than 3.6% of the total city area that must do the job of preserving the many species of plants and animals that struggle to persist in our city.

San Francisco has a stunningly beautiful and unique biological history and heritage. City-managed lands host differing weather regimes and soils, and we have diverse communities of plants and animals ranging from SF Bay coastline to live oak woodland, mature forest, vernal pool and prairie, to coast chaparral. Our native plants and animals have evolved over millions of years to thrive under distinct sets of conditions. To survive, they need us to notice them, learn about them, appreciate them, and ultimately commit to preserving them. Having this beauty and biological diversity within a 48-squaremile city is truly a very rare treasure! This amount of diversity is a public value that deserves diligent and dutiful stewardship. Future generations will grow up exploring and loving these natural areas, and this will create our future stewards for the unique natural heritage of San Francisco.

While we support the intention of the SNRAMP plan and its relevant projects for numerous city parks, we are profoundly troubled by the inclusion of the Sharp Park Golf Course, which conspicuously fails to cohere to the fundamental objectives of the overall SNRAMP plan. Alternative A18 (Sharp Park), which was added very late in the long-standing effort to draft SNRAMP and was added in direct contradiction of the promises of the City to consider that project separately, is principally just a very costly Golf Course

redevelopment plan. There are many reasons why this does not belong in the SNRAMP EIR – not the least of all that it is to be re-developed and managed primarily as a golf course (not as a natural area)! The Golf Course is not free to the public to be widely enjoyed (it'll only be open to paying golfers). Redeveloping and maintaining this particular golf course requires management practices, including draining the natural wetland and constant mowing which severely negatively impact two critically endangered vertebrate species on this property located in San Mateo County: the SF Garter Snake and California Red-legged Frog. This Golf Course will continue to use pesticides at levels not appropriate in other Natural Areas. Pretending that environmentally responsible redevelopment of this particular Golf Course would be possible -- in this era of increasing knowledge of sea-level rise and rates of coastal erosion -- is folly. Surely, San Francisco officials are smart enough to recognize that expensive efforts to keep this Golf Course are woefully short-sighted and may have permanently damaging consequences for these endangered species' survival. The City should remove the Golf Course elements to ensure this EIR is true to its stated purpose: preserving this city's natural areas.

Including the area to be redeveloped as the Sharp Park Golf Course contradicts the conservation objectives of the Natural Areas plan and compromised what would otherwise be unambiguously strong support from the environmental community. Furthermore, in the near future it will be critical to raise money for numerous SNRAMP projects, which are not yet funded. We believe that fundraising for authentic conservation cannot be achieved if the city intends to use those very same funds to support an expensive-to-renovate and increasingly expensive-to-operate golf-course which poses a persistent threat to two endangered species.

Golden Gate Audubon is committed to advocating for the SNRAMP plan in SF's city parks, which we view as a significant commitment to maintaining native biodiversity in this city. But we strenuously object to the inclusion of Sharp Park Golf Course elements, which really are not "natural area conservation" and are not even located within the City of San Francisco. We hope that you will certify the SNRAMP EIR *excluding* the functional Golf Course areas at Sharp Park and, instead, adopt the SNRAMP plan for the genuine natural areas of San Francisco.

2

Sincerely,

Cindy Margulis Executive Director



400 Capitol Mall, Suite 400 Sacramento, CA 95814 Tel. (916) 737-5707 ext. 102 mlynes@audubon.org

December 15, 2016

John Rahaim, Director and Planning Commissioners San Francisco Planning Department 1650 Mission St #400 San Francisco, CA 94103

Re: Sharp Park and the Significant Natural Resource Areas Management Plan (SNRAMP) EIR

Dear Director Rahaim and Planning Commissioners:

Audubon California<sup>1</sup> writes to strongly urge the San Francisco Planning Department to remove the Sharp Park Golf course redevelopment and management project from the San Francisco Significant Natural Areas Management Program (SNRAMP) Environmental Impact Report (EIR). The golf course project is directly at odds with the purpose and goals of the SNRAMP, creates greater threats to the San Francisco garter snake and the California red-legged frog populations, and its inclusion threatens the entire program.

San Francisco considers itself one of the greenest cities in the United States. The SNRAMP program is, on the whole, worthy of support and recognition. However, despite broad and persistent opposition from the conservation community, San Francisco continues to include a redevelopment project for a golf course that threatens two endangered species in a program specifically dedicated to protecting and enhancing local biodiversity.

We remind you that in the November 2009 Scoping Report for the SNRAMP process stated:

Because redesigning or eliminating the Sharp Park Golf Course is a separate proposal being studied by SFRPD, it will not be included or evaluated as part of the proposed SNRAMP project analyzed in the EIR. Should changes to the Sharp Park Golf Course be proposed, **they would undergo a separate regulatory review**, including CEQA environmental review. (emphasis added)

The decision to depart from the 2009 Scoping Report appears to be a tacit acknowledgement by the Recreation and Parks Department that the controversial golf course redevelopment program would not pass muster under the California Environmental Quality Act (CEQA) if

<sup>&</sup>lt;sup>1</sup> These comments are submitted on behalf of Audubon California, the state office of the National Audubon Society. Separate comments have already been submitted and/or will be submitted by Sequoia Audubon Society and Golden Gate Audubon Society, which are independent chapters of National Audubon, each with their own policies and positions related to Sharp Park. The National Audubon Society and its chapters should not be confused with "Audubon International", which is a separate entity funded in part by the U.S. Golf Association and that collects fees to "certify" developments such as golf courses and resorts as "bird-friendly" despite frequent opposition from conservation organizations.

analyzed on its own. Therefore, Sharp Park was included as part of the SNRAMP to push it through as part of a broader package that would reduce opposition to the project.

Now more than ever, San Francisco should lead by example in developing environmental policy and protecting local biodiversity. The Natural Areas Program is an excellent example of that leadership. It should not be diminished and potentially derailed by a cynical attempt to ram an expensive and environmentally-harmful golf course project through the CEQA process.

Therefore, Audubon California opposes certification of the SNRAMP Draft EIR unless the Sharp Park Golf Course redevelopment and management projects are removed. Please help the SNRAMP process continue unhindered and let the Sharp Park proposals be evaluated on their own merits in a separate CEQA process.

Thank you for consideration of our comments. If you have any questions, please do not hesitate to contact me at mlynes@audubon.org.

Respectfully submitted,

Michael Synes

Michael Lynes Director of Public Policy Audubon California



Peter R. Baye, Ph.D. Coastal Ecologist, Botanist 33660 Annapolis Road Annapolis, California 95412



baye@earthlink.net

January 5, 2016

(415) 310-5109

California Coastal Commission Stephanie Rexing, Coastal Planner 45 Fremont Street, Suite 2000 San Francisco, CA 94015

**SUBJECT**: Observations of apparent major long-term patterns of salinity intrusion indicators, north-western Sharp Park; relationship to modification of authorized drainage of Laguna Salada, Pacifica, San Mateo Co. (CDP 2-012-014)

Dear Ms. Rexing:

I would like to provide you with some observations of large-scale, conspicuous, and ecologically significant salinity intrusion indicators in vegetation and soil at Sharp Park. I am submitting these for your consideration in ongoing regulatory management of Sharp Park. Salinity intrusion patterns evident at the surface soil and vegetation are relevant to pumping and drainage of Laguna Salada that lowers Sharp Park groundwater elevations relative to the saline beach groundwater lens that is "pumped" by wave runup on the beachface.

Attached are annotated photos of greatly expanded dieback zones (apparently more than 2 acres) of irrigated turfgrass, and patches of salt-tolerant weeds (halophytes) in November 2015, and previous direct evidence of capillary efflorescence of salts in turgrass depressions and flats dating from 2010 (soon after they became conspicuous). Most of the turfgrass landward of the barrier beach at the northwest end of Sharp Park exhibited mass dieback this year. This acute dieback contrasted sharply with adjacent turfgrass at slightly higher elevation, or slightly or landward of zone of apparent shallow brackish groundwater influence.

The 2010 observations of incipient salinity intrusion provide direct evidence of salt efflorescence at the soil surface in depressions where the dieback zones initiated, as well as rapid colonization by non-native halophytes (salt-tolerant weeds) that replaced barrens left by dead turfgrass. As you know, turfgrass is physiologically unable to cope with soil salt levels so high that they visibly accumulate as crystalline salt crusts at the soil surface between rains or irrigation episodes. These patterns are not consistent with any other mechanism of salt transport, such as salt spray deposition (minimized in lee of a barrier, and at the ground surface).

As sea level rises, wave runup and beach elevations rise relative to the water surface elevation of Laguna Salada. Thus, groundwater gradients between the sandy barrier beach (underlying the artificial earthen berm) should be expected to steepen towards Laguna Salada as long as it is

Peter R. Baye Coastal Ecologist baye@earthlink.net pumped to elevations lower than beach groundwater. The lower the lagoon is pumped relative to beach groundwater levels, the steeper the saline groundwater gradient is likely to become – along with the magnitude of salinity intrusion impacts. The dramatic localized expansion of the turfgrass dieback from local depressions in 2010, to mass dieback of the entire western turfgrass zone in 2015, is consistent with a significant long-term adverse increase in salinity intrusion from shallow brackish groundwater flow from the beach toward the drained low lagoon. The details of the patterns of dieback gradient and salt efflorescence along the historical footprint of the sand barrier beach are also consistent with a pattern of shallow brackish groundwater intrusion from the beach, expressed as a zone of capillary rise of soil salts in low elevation areas. This pattern is probably magnified and revealed by the drought, which has reduced dilution of beach groundwater salts.

The fringing marsh (wetlands) at some western the Laguna Salada shoreline segments is also apparently exhibiting localized patterns of dieback consistent with increased salinity intrusion. The eastern shore marsh of Laguna Salada exhibits no salt dieback patterns (just low water level vegetation indicators), but there is unprecedented dieback of bulrush, rush, and stunting of tules, along with expansion of saltgrass, on the south lobe of the relict washover fan. This is consistent with increased salt stress in wetland vegetation, which I have not observed in past droughts. These are obviously not simply drought patterns of physiological wetland vegetation stress, because they are highly asymmetric across the lagoon.

Salinity intrusion at Sharp Park is a long-term management problem for wetland management, water quality, and turfgrass maintenance feasibility. Prof. Rosemary Knight (Stanford University, GEM – Center for Groundwater Evaluation and Management <u>https://gemcenter.stanford.edu/</u>) has developed efficient and definitive imaging methods (Electrical Resistivity Tomography) for measuring salinity intrusion in shallow coastal groundwater in Central California and elsewhere. I recommend that the Commission fully consider requiring monitoring of groundwater and salinity intrusion with such methods in order to constrain impacts of lagoon drainage (pumping) as sea level rises. In addition, as the Commission modifies the Coastal Development Permit conditions for Sharp Park related to pumping, I would recommend requiring well-distributed year-round sampling (multiple transects) of soil salinity and vegetation, from the soil surface to groundwater capillary fringe, across the backbarrier zones exhibiting long-term patterns of turfgrass dieback.

Thank you for your consideration and efforts to balance public interest in wetland conservation, water quality, and coastal recreation in your administration of the Sharp Park CDP.

Respectfully submitted,

Peter R. Baye, Ph.D.

Cc:

Peter R. Baye Coastal Ecologist baye@earthlink.net John Dixon, California Coastal Commission Nancy Cave, California Coastal Commission Bob Battalio, Chief Engineer, ESA, San Francisco Greg Kamman, KHE Hydrology, San Rafael (Attachment)

ATTACHMENT

Peter R. Baye Coastal Ecologist baye@earthlink.net Observations of salinity intrusion patterns evident in turfgrass dieback, halophyte (salt-tolerant plant) colonization, and salt efflorescence at Northwestern Sharp Park, 2010-2015.



1. Sharp Park northwestern turfgrass dieback patterns: 2015

Northwestern Sharp Park turfgrass exhibiting almost complete dieback in topographic lows (flats and swales close to groundwater level indicated by lagoon water surface; C) behind barrier beach. Note contrasting green turfgrass on landward mounds in background (A) and seaward depressions colonized by salt-tolerant weeds (B). Iceplant (*Carpobrotus edulis* x *chilensis*) in foreground. November 25, 2015.



Nearly complete dieback of turfgrass landward of Salada barrier beach and dike (C). Green vegetation in lowest depressions (B) is composed of salt tolerant weeds identified in 2010, including spurrey (*Spergularia* spp.) and staghorn plantain (*Plantago coronopus*) rather than turfgrass species. November 25, 2015.

Peter R. Baye Coastal Ecologist <u>baye@earthlink.net</u>


Nearly complete dieback of turfgrass landward of Salada barrier beach and dike (C). Green vegetation in lowest depressions (B) is composed of salt tolerant weeds identified in 2010, including spurrey (*Spergularia* spp.) and staghorn plantain (*Plantago coronopus*) rather than turfgrass species. November 25, 2015.



Contrast: green turfgrass flats at similar elevation range, north and northeast of Laguna Salada, landward of salinity intrusion zone. November 25, 2015.

Peter R. Baye Coastal Ecologist <u>baye@earthlink.net</u>



Green turfgrass landward and above salinity intrusion zone (A - sand trap topographic highs, background) and yellow-green salt-tolerant weeds in lowest, most saline depressions (A – foreground). Matrix: (C) salt-killed brown-gray turfgrass litter. November 25, 2015.



Green turfgrass landward and above salinity intrusion zone (A - sand trap topographic highs, background) and yellow-green salt-tolerant weeds in lowest, most saline depressions (A – foreground). Matrix: (C) salt-killed brown-gray turfgrass litter. November 25, 2015.

Peter R. Baye Coastal Ecologist baye@earthlink.net



Conspicuous narrow transition zone between salinity intrusion (turfgrass dieback, capillary transport of salt from shallow brackish groundwater, C) and drained, non-saline turfgrass on rolling topography (higher elevation) landward of salinity intrusion zone (A). November 25, 2015.



Corresponding wetland vegetation impacts of salinity intrusion, western central shore of Laguna Salada: dieback of rushes and bulrushes (*Juncus lescurii, Schoenoplectus pungens*) and stunted tules (*S. californicus*) on seaward fringing marsh. Green low vegetation at emergent bed of low lagoon includes rapidly growing salt-tolerant saltgrass (*Distichlis spicata*). November 25, 2015.

Peter R. Baye Coastal Ecologist baye@earthlink.net 2. Incipient salinity intrusion patterns at NW Sharp Park prior to drought: 2010



Depressions in turgrass flats landward of the barrier beach are the first areas to exhibit acute salinity symptoms in 2010: acute recent dieback of turfgrass with sharp boundaries related to topography and drainage, salt efflorescence at surface of soil and leaf litter, and initial colonization of barrens by salt-tolerant weeds. Surrounding matrix of turfgrass remains green above depressions; no contrast between landward and seaward turfgrass dieback outside depressions. Incipient dieback (browning) of turfgrass is evident in shallower depressions. March 27, 2010.



Sharp boundaries and surface expression of capillary rise and efflorescence of salt from shallow groundwater in depressional topography of northwest golf course. White surface is salt efflorescence on dead grass litter and soil. Light brown is dead turfgrass litter; darker brown is prostrate broadleaf weedy Peter R. Baye Coastal Ecologist

Coastal Ecologist <u>baye@earthlink.net</u> vegetation intolerant of salt, accumulated prior to expansion of populations of salt-tolerant weed species. March 27, 2010.



Sharp boundaries and surface expression of capillary rise and efflorescence of salt from shallow groundwater in depressional topography of northwest golf course. White surface in foreground is salt efflorescence on dead grass litter and soil. Light brown is dead turfgrass litter; darker brown is prostrate broadleaf weedy vegetation intolerant of salt, accumulated prior to expansion of populations of salt-tolerant weed species. March 27, 2010.



Surface expression of capillary rise and efflorescence of salt from shallow groundwater in depression at northwest golf course. White surface in foreground is salt efflorescence on dead grass litter and soil. Light brown at edge of dieback zone is dead turfgrass litter; darker brown in center is prostrate broadleaf weedy vegetation intolerant of salt, accumulated prior to expansion of populations of salttolerant weed species. March 27, 2010

Peter R. Baye Coastal Ecologist baye@earthlink.net



Detail of salt efflorescence (fine crystalline crust) on soil surface and leaf litter of barren area in depressional turfgrass dieback zone. March 27, 2010



Establishment of salt-tolerant weeds in salt efflorescence patches within turfgrass dieback zone – seedings and mature rosettes of staghorn plaintain (*Plantago coronopus*), only patchy in turfgrass dieback barrens in 2010. March 27, 2010. Later expansion of this and other salt-tolerant weed populations in depressions reversed the green/dieback pattern in 2015, apparently restricting green to the salt-tolerant weeds of the depressions where salt and moisture concentrate, and leaving dead turfgrass in new areas reaching lethal soil salt levels.

Peter R. Baye Coastal Ecologist <u>baye@earthlink.net</u>



Establishment of salt-tolerant weeds in salt efflorescence patches within turfgrass dieback zone: spurrey (*Spergularia* sp., likely *S. bocconii* ), in early stages of colonization in barrens in 2010. March 27, 2010.



Persistence of localized depressional turfgrass dieback areas in 2010, within matrix of irrigated turfgrass. June 10 2010.

Peter R. Baye Coastal Ecologist <u>baye@earthlink.net</u>



(415) 310-5109

Peter R. Baye, Ph.D. Coastal Ecologist, Botanist 33660 Annapolis Road Annapolis, California 95412



baye@earthlink.net

# MEMORANDUM

To: Stephanie Rexing, California Coastal Commission – North Central Coast

Date: April 16, 2015

**SUBJECT**: Sharp Park Project Project, 2-12-014, California Coastal Commission staff report and addendum: formulation and assessment of feasible alternatives to wetland dredging; technical clarifications.

Dear Ms. Rexing:

After reviewing the Staff Report (April 3, 2015) and Addendum (April 15, 2015) for the Sharp Park Infrastructure project, I would like to provide some clarifications regarding some major and minor technical issues regarding wetland ecology and management. I hope this will help correct some apparent confusion regarding formulation and assessment of feasible alternatives to dredging marsh as a means of increasing open water/marsh edge habitat, and reversing progressive spread of tules and cattail marsh into shallow open water habitats at Laguna Salada.

I am submitting the comments below not as an opponent or proponent of the project, nor on behalf of other project opponents or proponents. My main aim is to help clarify what a potentially feasible alternative to wetland dredging actually would be and how it would work, so that it can be meaningfully assessed for Coastal Act policy compliance (including conflict resolution procedures). I think I can outline a very simple, scientifically sound and feasible alternative to dredging based on modest seasonally timed (winter-spring-early summer) increases in mean lagoon water levels on the order of only 1 to 2 feet above current target levels, which are *feasible* (water levels not associated with golf course closure in recent years), even though they may not be the applicant's *preferred* alternative.

# 1. Alternatives to dredging marsh to maintain open water/marsh edge

The version of the water level management alternative assessed in the staff report has become distorted as a "straw-man" alternative, needlessly burdened with an infeasible premise of excessively high water levels (near 12 ft NAVD) that have not actually been proposed, even in a wetland restoration context.

...water levels required for such a process would be up to three to four feet **higher than the very highest winter/spring flooding ever recorded** to have occurred at the Golf Course (see above, 12 feet NAVD88 inundation line on Figure 1), effectually closing down the entire Golf Course for a longer duration of time. Staff Report p. 24; bold added for emphasis)

Please note that this description of the water management alternative, which raises water levels 3-4 ft above the *highest* flood levels above the *upper lagoon wetland edge*, is inconsistent with the Staff Report's account of the water management alternative on page 34, which raises water levels *above the submerged lagoon bed* at the *lower edge of marsh vegetation* to reach a minimum submergence depth of 4 feet. This confusion about the upper and lower reference positions for water level changes completely distorts the alternative.

#### 2) Flooding of the Vegetation

Project opponents suggest "conventional" water depth management of the marsh and ponds. This entails raising the amount of water **around the lower edges of tules and cattails** from 2 to 4 feet deep **to a minimum of 4 feet deep**. The alternative also calls for amphibious equipment to mow tules and cattails to stumps before the winter flooding and frog breeding season begins. Opponents assert the submerged tule and cattail stumps will die off due to the lack of oxygen, solving the problem of emergent vegetation. (Staff Report p. 34)

I know of no scientific justification for assuming a 4-5 ft increase in lagoon water levels to 12 ft NAVD to achieve reduction of tule and cattail spread. Raising lagoon water levels to 12 ft NAVD would not only be physically infeasible over the summer, it would submerge even the uppermost marsh in about 3 feet of water, which is near the limit of tule and cattail flooding tolerance. That would constitute an absurd "overkill" straw-man alternative that would drown most of the existing Laguna Salada marsh into open water – an alternative designed to fail and cause unjustifiable impacts while overshooting the aim of increasing open water area commensurate with the proposed marsh dredging.

Instead, to achieve a modest increase of open water habitat and retreat of lower marsh edges commensurate with (or moderately greater than) proposed marsh dredging, a 1 to 2 ft rise in target winter-early summer water levels by reducing pumping, with inevitable gradual summer drawdown (due to natural seepage outflow and evapotranspiration, not pumping), should be considered. This would mean target water levels triggering pumping to rise to only about 8-9 ft NAVD, not 12 ft, during winter, spring, and early summer.

To drown out the edge of tules and cattails along the lower (deepest) end of the depth gradient they can tolerate near the open water edge under existing conditions, there is simply no need to maintain a super-elevated 12 ft NAVD constant lagoon water level all year or even part of the year. Tule and cattail "drowning" in the wetland zone now near their limit of tolerance – 3-4 ft deep water zones during the wet winter season and much of the

growing season -- could occur by raising water levels only 1-2 ft deep, making the same zone 4-5 ft deep over winter and spring. This would exceed their limits of tolerance for high survivorship (regrowth), even if drawdown of water levels below limits of submergence tolerance later occur by mid-summer.

This drowning-dieback management method – flooding out cattails and tules by controlled episodes of excessive water levels for part of the year – is a conventional marsh habitat management method that predates wetland ecology as a science. It also emulates natural processes of among-year and between-season fluctuations in non-tidal lagoon water levels, which naturally keep dominant low marsh species like tules and cattails in check. Thus, it does not matter if shallow water conditions occasionally occur in drought years or multi-year droughts, as long as occasional wet years with prolonged high water stands around 8-9 ft during the winter and growing season occur.

The longer periods of deeper submergence along the lagoon depth gradient is what holds tules and cattails in check. All coastal lagoons usually draw usually down gradually during the summer evaporation period. They tend to equilibrate or "bottom out" as they approach the elevation of beach groundwater as freshwater inflows from groundwater and streams decline. But *starting* the marsh growing season at the bottom (shallow lagoon low stand, late summer-like low water) even at the start of growth in earliest spring – unleashes the progressive tule spread that the applicant is trying to address with dredging instead of managing them with naturalistic seasonally higher fluctuating water levels

As for aquatic mowing of low marsh near the open water edge (cutting tule and cattail shoots at their bases in fall, prior to rains and frog breeding), this technique is only a potential supplemental action to maximize physiological stress on cattail and tule roots and rhizomes during periods of deep submergence. In contrast with dredging to maintain open water in shallows that would otherwise support marsh, it would be a one-time event coordinated with initial raising of winter-spring lagoon water levels.

The functional basis for aquatic mowing to control tules and cattails at depth near their limits of tolerance (3-4 ft) is as follows. Submerged cattail and tule roots and below-mudline buds "breathe" through air passages in both live and dead standing shoots above the water surface. When these above-waterline shoots are cut or submerged, roots and rhizomes deplete limited reserves of oxygen, and are exposed to natural sediment toxins like sulfides, which are otherwise neutralized by low levels of oxygen diffusing from roots. The only way the mown plants can reconnect roots to oxygen pathways to roots is by elongating new shoots above the waterline. Submergence by 3-4 feet of water or more severely limits the ability of roots to resume normal metabolism, compared with intact plants with standing shoots above the waterline. Aquatic mowing of marsh arguably has significantly less wetland impact (equipment mobilization, sediment disturbance, biogeochemical and water quality effects) than dredging marsh sediment.

There is another major difference between the water level management alternative and proposed dredging with regard to the spatial pattern of open water and marsh, and marsh drainage and pumping, and it relates to the contrasting basic purposes of flood control versus habitat enhancement. Moderately raised lagoon water levels (1-2 ft above existing baseline near 7 ft NAVD) would not produce a large, deep linear ditch aimed at the pump intake forebay, with maximum efficiency for drainage and pumping (*i.e.*, floodwater conveyance), as dredging a canal would. The remnants of the old ditch are apparently infilled with vegetation and the young peat (organic substrate) it produced, so it is uncertain whether raising water levels would re-open shallow water over the old ditch alignment significantly, if at all.

In contrast, raising lagoon water levels by 1-2 ft would very likely open more water habitat next to the lowest elevation marsh at the existing open water/marsh edge, along a depth gradient controlled by bathymetry of the lagoon This difference discriminates between the basic project purpose as flood control for recreation land use, and the (incidental or fictitious) purpose of increasing open water/marsh habitat edge. But if the basic purpose is really to increase open water/marsh habitat and reverse progressive spread of marsh into open water (caused by long-term marsh pumping and drainage to stable shallow summer-like water levels most of the year), then a properly designed water management alternative would be more effective and environmentally superior (higher short-term and long-term benefit/lower impact).

I agree with the Staff Report conclusion that dredging is at most a very short-term, *temporary* solution to the problem of progressive marsh spread into open water:

By analogy, clearing of the vegetation and sediment is a *temporary* action to maintain the existing capacity of the pumps." [Staff Report p. 23].

...shallow water, which in one sense, benefits egg laying by the CRLF because the frogs prefer warmer waters, also promotes the growth of cattails and tules, causing the encroachment of emergent vegetation within LS and HSP. This spread of emergent vegetation not only compromises the pumping operations, but also leads to loss of open water habitat needed by CRLF.13 SFRPD has explained that the cu*rrent project activities proposed in this CDP application consist of a short-term solution to an ongoing problem.* SFRPD is currently considering long-term solutions... Staff report p. 22

In addition, the project represents a *temporary solution to an existing problem* that may be already aggravated by the ongoing maintenance activities at the Golf Course. Specifically, ongoing pumping activities at the Golf Course, which will continue as a result of the infrastructure improvements and replacement pumps, may continue to maintain low water levels that all parties agree aggravate the spread of emergent vegetation which compromises open water breeding habitat for CRLF. So, while this

project proposes a temporary feasible management *solution, the ongoing pumping may continue to exacerbate the problem in the long-term.* Staff report p. 25:

These statements appear to be inconsistent with Staff Report findings on page 2, which appear to be unexplained and without citation:

Additionally, clearing sediments and vegetation from Horse Stable Pond *will maintain the long-term functional capacity* of the wetland complex and *may eventually increase such capacity* consistent with Coastal Act Section 30233(c).

As long as the lagoon is maintained artificially shallow most of the year, the marsh will reoccupy all shallow water within its limits of submergence tolerance. Maintenance of perpetually low summer-like water levels most of the year also implies *permanent, perpetual dredging cycles*, probably on the order of 5 years, to maintain open ditches. It also inevitably implies *permanent* (cyclic) *impacts* of marsh maintenance dredging. Is this foreseeable ongoing, cumulative dredging impact to wetlands assessed in the staff report? Or is the project treated as a one-time event? I know of only one other coastal wetland in California occupied by federally listed endangered species where regulatory agencies approve of routine dredging of marsh as maintenance activity: "grandfathered" (century-old) vast areas of managed waterfowl marshes of Suisun Marsh, where routine non-tidal ditch maintenance has relatively low-level impacts to one widespread listed wildlife species, for which applicants have substantial compensatory mitigation obligations.

The Staff Report also infers that raising water levels would increase water level fluctuations that adversely impact breeding of California red-legged frogs. This matter requires careful analysis, and I believe it is basically incorrect. The water level fluctuations actually should decrease, not increase, as the target water level is raised, because with less deviation between target threshold levels triggering pumping and flood levels, pumps (should activate less often during flood periods. Thus, rapid, abrupt drawdown of lagoon levels during the frog breeding season should decrease in both frequency and magnitude.

I can find no documented evidence that Sharp Park golf recreation is now significantly impaired by shallow flooding of wetland and golf turf margins around elevation 9 ft NAVD in 2015. I observed shallow flooding of mown turf areas around holes 14-15 (approximately 9 ft elevation, dead reckoning by topographic maps; I did not conduct elevation surveys of water levels). Even in this drought year, on April 2 and March 7, Sharp Park golf course was open and busy (many players even near sunset). See photos below, taken from Sharp Park Boulevard. Both golf players and ducks were present side-by-side along the flooded edges of the northeast corner of the golf course. Is it the applicant's burden to demonstrate that golf is actually "infeasible" at approximately 9 ft water levels, rather than merely not the applicant's preferred alternative?



April 2, 2015

March 7, 2015



March 7, 2015

# 2. Historical Ecology of Sharp Park

The Staff Report Addendum on page 5 states, "...in regards to the historic ecology of Sharp Park staff does not see a significant area of disagreement between what has been presented in the staff report and what was presented by the project opponents". The Staff Report is inconsistent in its statements regarding historical ecology of Laguna Salada, possibly due to citation of different sources and inadvertent misinterpretation. The problematic statement of historical ecology occurs on page 34 of the Staff Report, where it reiterates local lore:

Sharp Park is unusual in that natural conditions are not necessarily the best conditions for the sensitive species in question here. Under completely natural conditions, without the berm and with no pumping, CRLF would probably not exist at the site as the water would be too brackish. The CRLF began surviving at the site after the water became less salty....[Staff Report p. 34]

This statement above is not consistent with Staff Report statements citing Dr. John Dixon's memo (Exhibit 7), which is substantially correct and agrees with statement of "opponents" that the lagoon was normally non-tidal, and only intermittently tidally influenced through an unstable and ephemeral tidal inlet:

The watershed is too small for runoff to maintain on open inlet or regularly breach the barrier beach, but the lagoon was probably **intermittently and briefly connected to the ocean through an outlet channel** and it periodically received sea water that overtopped the sand berm adjacent to the beach. These hydrological characteristics probably resulted in a salinity gradient from brackish near the beach to fresh at the landward edge. (Staff Report Exhibit 7, April 2 Dixon memo; bold added for emphasis)

In their letter of April 13, 2015 the project opponents claim that contrary to the staff report findings, "Sharp Park was historically a backbarrier lagoon/beach ecosystem, and was not influenced by *daily* tides."

To clarify, there is a huge ecological difference between "influenced by daily tides" and "intermittently and briefly connected to the ocean through an outlet channel". Daily tides occur through permanently open tidal inlets, like those of swell-sheltered south-facing tidal lagoons such as Bolinas Lagoon, Drakes Estero, or Bodega Harbor, or jetty-maintained inlets like Moss Landing. The relevant significant point here is that overwhelming physical process and historical ecological evidence supports the hypothesis that Laguna Salada supported fresh-brackish wetland gradient with tule, cattail, and bulrush marsh, long before the berm or golf course. This is not consistent with the Staff Report's causal attribution of fresh-brackish wetlands to the berm on page 7: "*As a result of the berm*, the wetlands found within the Golf Course transitioned from historically tidally influenced saltwater wetlands that were brackish near the beach, to modernly freshwater wetlands (see Dr. John Dixon's Memo)."

Natural fresh-brackish lagoon wetland gradients are typical of coarse-grained, west-facing barrier beaches and the lagoons they enclose in the North Central Coast region. These fresh-brackish natural lagoon wetland ecosystems support California red-legged frogs, western pond turtles, and garter snake subspecies in the absence of artificial dikes, berms, or golf courses. Many examples with supporting analysis are provided in the appendices of the peer-reviewed ESA-PWA (2011) report on Laguna Salada, which is substantially consistent with Dr. Dixon's memo. <u>https://www.savethefrogs.com/actions/sharp-park/images/Sharp-Park-Report.pdf</u>

The historical Laguna Salada, prior to Sharp Park construction, supported fringing marshes with cattails and bulrushes that were intolerant of high salinity. Laguna Salada was ...a brackish to fresh-brackish wetland like other seasonal or nontidal coastal lagoons in the region."... We conclude that Laguna Salada in its predisturbance state was a backbeach lagoon that was predominantly non-tidal and primarily formed by rainfall runoff pooling behind the beach ridge. The coarsegrained beach was built and maintained by strong wave action and adequate sediment supply. Our analysis indicates that the lagoon was not big enough to maintain a tidal opening against the large waves that would close it off. However, waves were (and are) large enough to overwash the beach and bring in salt water. Therefore, we conclude that salinity was controlled by fresh runoff but was variable fresh-brackish (low salinity) due to wave overwash and brief tidal incursions following breaching

We conclude that fresh-brackish CRLF and SFGS wetland habitat existed at Laguna Salada before the golf course was constructed, when the site was modified for agriculture. We also conclude that pre-agricultural conditions could have, and likely did, include CRLF and SFGS habitat. (ESA-PWA 2011).

Again, the importance of this point is that the origin and maintenance of fresh-brackish wetland gradients and listed species did not depend on golf or artificial berms. Fresh-brackish lagoon wetlands naturally occur throughout the region, and there is unambiguous evidence of cattail-tule fresh-brackish marsh at the landward end of Laguna Salada prior to the golf course.

### 3. Scenic coastal views. (Staff Report p. 2, 3, 18)

The analysis of scenic views at Sharp Park is related to topography and vegetation of the beach, berm ("seawall"), and golf course, as well as public access constraints like the new fence along the berm. I do not claim expertise on scenic views, but I would like to clarify some basic confusion in the Staff Report related to views on p. 18:

Sharp Park is a public park that provides recreational opportunities for all people. In addition to the golf course, it offers breathtaking views to hikers, runners, cyclists, and due to the easy access by car and on foot, to visitors who may only have a short time available to see the ocean. Sharp Park qualifies as a sensitive coastal resource area due to its significant recreational value and because it is a highly scenic area.

The scenic coastal views of the ocean, beach, and lower Mori Point cliffs from the golf course itself are obscured by the berm/seawall, which has a crest elevation about 6 ft or more above the beach crest, which ranges around 17-18 ft elevation or higher. Most of the golf course lies in the depression of partly filled Laguna Salada at elevations well below the berm crest. Even from Sharp Park Boulevard, above the golf course, the beach is not visible

across the berm. The spectacular views described are possible only from the berm/seawall and beach, which is separated from the golf course by a new/recent fence. In addition, relict Monterey cypress groves (dead standing snags and live trees) further obscure coastal vistas from the golf course itself. Therefore, the scenic view qualities described and extolled in the Staff Report are features of the berm, not the golf course in its current form. The original Alister MacKenzie golf course design apparently allow for open coastal views, but that came at the cost of excessive vulnerability to coastal storms which eventually destroyed the western part of the golf course, in an obvious storm overwash hazard zone.

**4. Monitoring methodology and sampling strategy.** In order to generate interpretable, analyzable data, conditions for monitoring must include requirements for the spatial sampling plan (distribution of sampling locations on landward and seaward portions of the lagoon, and in transects spanning the lagoon/marsh gradients). In addition, vegetation data must include position data (GIS or ground survey) data on the lower edge of marsh/water edge vegetation, in order to interpret horizontal marsh retreat/advance responses to water level changes over time. Aggregate "cover" area estimates will not be sufficient for this purpose. In addition, disturbance-free (exclosure) transects including the upland/marsh edge will be necessary to determine the accurate position of the wetland boundary and buffer zones. This will also necessitate accurate identification of grasses, including *Agrostis stolonifera* (creeping bentgrass, a widespread wetland grass also occurring in some golf turf; distinct from *Poa* (bluegrass) species.

**5.** Chronology of earthen berm incremental construction. The Staff Report (p. 12) states that the golf course was "separated from the beach by a berm built in 1941 to keep the ocean from flooding the course", and then jumps to the description of the recent armored condition: "This earthen berm, with a rock revetment on its western side..". This chronology is inconsistent with historical aerial and ground photography of Salada Beach and Laguna Salada. I would recommend that staff rigorously examine the available historical aerial and ground photography available to develop an accurate chronology of the berm. Robert Battalio (ESA) did this for the ESA-PWA report on Laguna Salada (2011), and concluded that:

While dune building and stabilization in the 1920s to 1940s altered the natural beach berm morphology, a significant coastal structure did not exist until decades later. A review of historical photographs and documents indicates that the existing levee was not constructed until the 1980s. The majority of the coastal levee/seawall was constructed in 1989-1990. .... A review of available photos prior to 1983 shows an earth embankment at the north and south ends of the shore, with no embankment in the middle third. The embankments are not as large as the existing levee and proposed seawall structures, and do not extend the full length of the shore. (ESA-PWA 2011 p. 15; and Appendices)

**6. Conclusions**. <u>Without prejudice to permit issuance or denial</u>, I recommend that staff rigorously re-examine the premises and conclusions of the alternatives analysis, particularly

with regard to accurate, objective feasibility thresholds and hydrologic-ecological thresholds. Scientifically sound analysis of wetland management alternatives is critically important in context of wetland dredging policies and conflict resolution procedures, and evaluation of reasonable public interest trade-offs between recreation policy priorities and coastal wetland or ESHA resource conservation priorities.

## 7. Summary statement of qualifications (coastal wetland ecology expertise).

I have over 35 years' experience as a professional coastal ecologist, including senior wetland regulatory analysis for the U.S. Army Corps of Engineers San Francisco District, and endangered species recovery planning focused on coastal wetland ecosystems of California, with specialization in ecology of coastal lagoons, tidal marshes, beaches, and dunes. I have closely observed coastal lagoons from Marin to Santa Cruz for over two decades, and my professional wetland consulting work includes restoration, enhancement guidance for multiple coastal lagoons managed and owned by California State Parks and National Park Service. I co-authored a detailed and comprehensive assessment of modern and historical ecology of Laguna Salada with ESA-PWA (now ESA) in 2010.



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The Wild Equity Institute is working to build a new public park at Sharp Park in Pacifica, CA. With our partners at the NPCA, the Neighborhood Parks Council, the National Japanese American Historical Society, and many other organizations, we have proposed to close the course and partner with the National Park Service to restore the land and interpret its hidden history, including the former WWII internment camp and prehistoric artifacts that have been found on the site.

Perhaps in response to this idea and litigation, **for the first time San Francisco is proposing to landmark Sharp Park Golf Course. This proposal is not well informed**. Below you will find background information about this proposal.

Although Alister MacKenzie, the original architect of Sharp Park Golf Course, has made some important golf courses, there is significant disagreement about (a) the quality of the original architectural design at Sharp Park and whether it is a reflection of Mackenzie's signature design, and (b) its current integrity. **Every history written about this course before the restoration proposal we are advancing was announced concluded that the original MacKenzie design no longer exists at Sharp Park today**.

Some contemporary golf advocates have suggested that these previous assessments were based on misinformation or bad data. They have gone as far as suggesting that several of the links at Sharp Park remain consistent with Sharp Park's original design. As a preliminary matter, **golf courses are not simply a collection of links: they are a course, and to suggest that because a few golf links remain in the places Alister MacKenzie placed them does not answer the question about the historic integrity of the course as a whole.** 

But more importantly, these assessments are directly contradicted by assessments made away from the heat of this dispute, and not conducted by individuals with a stake in the outcome. **Indeed, the only individuals who have asserted that Sharp Park is historic are associated with the San Francisco Public Golf Alliance—a golf activist organization that is not qualified to provide these assessments, and has an inherent conflict in doing so regardless.** Therefore, the previous assessments are more likely to be unbiased and accurate: even if the historians who wrote them would prefer the original course be restored, instead of than the natural areas upon which the course was built.

Some of MacKenzie's courses should be considered for recognition. But Sharp Park is simply not the place to start. There is not a single Alister MacKenzie golf course presently listed on the California or federal registers of historic places, and most everyone would agree that Sharp Park is not one of the greatest examples of his work. Indeed, **the litany of problems the golf course faces**—from chronic annual flooding, to the killing of endangered species, to the low grades given the course by its own golfers, to the chronic financial instability of the course, to the inevitable loss of the site to sea level rise as our climate changes—all indicate that this particular course does not exemplify the work of a master implementing his art.

Moreover, the San Francisco Public Golf Alliance has distributed false information to the Planning Department and to the Historic Preservation Commission arguing that Sharp Park Golf Course itself has been designated an historic landmark by the City of Pacifica. **This is not true: indeed**, **to the extent any historic preservation has been provided to Sharp Park, it has been equally provided to the trees, lagoon, and marsh on the property,** as will be shown below. Indeed, a proposal to try and landmark the golf course was tabled indefinitely by Pacifica's Planning Commission in 2009.

The Pacifica General Plan (as updated August 2005) Historic Preservation Element. This section includes a "list and map of all of the sites and structures felt to be of historic significance in Pacifica."

With regards to Sharp Park, the Pacifica Historic Sites list includes:

# Number 18. Laguna Salada & Marsh Number 19. Sharp Park Golf Course & Clubhouse Number 20. Trees in Sharp Park

However, this section also states that "the element would be implemented by an Historic Ordinance which would establish a Pacifica Historic Sites Advisory Committee to review proposed changes to sites and structures designated on the Historic Sites Map and advise the Planning Commission and City Council of the appropriateness of the proposal." **No such Historic Ordinance or Advisory Committee was ever created: instead Pacifica implemented this through its zoning code.** 

Title 9 of Pacifica's Zoning Code, Chapter 7 covers Historic Preservation. Section 9-7.208 of the Code lists Pacifica's designated Historic Sites:

Sec. 9-7.208. - Final designations.

The following structures, having been approved by the Planning Commission and Council for designation as historic landmarks pursuant to the procedures of this article, are hereby given final landmark designation:

(a)Sanchez Adobe;
(b)Sharp Park Golf Course Clubhouse;
(c)Little Brown Church;
(d)San Pedro Schoolhouse;
(e)185 Carmel Avenue;
(f)Vallemar Station, 2125 Cabrillo Highway;
(g)Anderson's Store, 220 Paloma Avenue;
(h)165 Winona Avenue; and
(i)Dollaradio Station.

(§ 1, Ord. 482-C.S., eff. May 27, 1987, as amended by § 1, Ord. 533-C.S., eff. September 27, 1989, § 1, Ord. 534-C.S., eff. September 27, 1989, and § 2, Ord. 569-C.S., eff. July 10, 1991, § II, Ord. No. 770-C.S., eff. May 26, 2010)

As you can see, only the golf course clubhouse has been designated historic by Pacifica. Laguna Salada itself, along with the golf course, are 'potential' historic resources according to the general plan, but because these potential resources were never finalized into actual landmarks, they are not so protected.

Only Sharp Park Golf Course's clubhouse is listed as an historic landmark in Pacifica, an uncontroversial finding that is not impacted in any way by the restoration proposals we have all pursued. However, to rely on Pacifica's general plan as reason to landmark the golf course takes one only so far, because the marsh, lagoon and trees—all directly threatened by the course, are provided the same level of so-called protection as the course itself.

San Francisco's own Historic Preservation Commission, the City's agency responsible for identifying and designating landmarks, disagreed with this assessment. **On September 21, 2011, the Commission ordered staff to prepare comments stating that they do not concur in the Recreation and Parks Department's position that Sharp Park retains historic integrity.** 

There is good reason for this determination:

- The Recreation and Parks Department's Historic Resources Evaluation provides insufficient information and evidence to support its conclusion that Sharp Park retains historic integrity.
- The evaluation also **lacks a proper analysis of the historic landscape**, and thus there isn't an appropriate baseline to judge integrity.
- The Evaluation also **fails to consider a range of mitigation measures**, and thus precludes restoration of endangered species habitat. Historic preservation and natural resources protection are not exclusive Crissy Field and Muir Woods restoration are examples of natural resource restoration projects where historic resources existed.
- The National Park Service has asked to play a role in any historic resource evaluation of the golf course per their 2009 statement because the course is within their historic boundary and they are undertaking a multi-million dollar wildlife habitat restoration project adjacent to Sharp Park, yet the City has not engaged the Park Service. The **Park Service is considered the most respected expert in historic resource preservation**.

Attached to this memo are previous statements by the National Park Service and the City of San Francisco opposing landmarking the golf course in Pacifica; written histories about how the course no longer retains integrity; and a link-by-link assessment of what has been lost at the golf course.

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Sharp Park today bears no resemblance to Alister MacKenzie's original design. **Every link has been changed at Sharp Park—in many cases radically, and many holes have been lost completely.** It is misleading to claim that any historical integrity exists at the course.

- The water features on five MacKenzie holes east of Laguna Salada, original holes 1, 9, 15, 16, & 17, have been culverted, eliminating crucial water hazards essential to his design.
- Five holes west of Laguna Salada, including original holes 3, 4, 6, 7, & 8 were destroyed completely by massive coastal storm surges and the subsequent construction of the berm.
- Two others, original holes 2 & 5, were severely damaged and modified to eliminate additional water features and other elements of their design. Now the site of hole 12, the original hole 2 was shortened by 60 yards and a stroke while the strategic features—including its proximity to a much larger Horse Stable Pond than exists currently—are almost completely irrelevant to the hole's play today. Hole number 5, which was considered by Jack Fleming to be "one of the most interesting holes on the course, similar to Dr. MacKenzie's 'ideal golf hole,'" is now the current site of hole 17, but other than occupying the same space the hole bears absolutely no resemblance to the original hole 5: a tee shot over Laguna Salada has been removed, and dual fairways have been combined into one, eliminating strategy alternatives integral to MacKenzie's design.
- Original holes 10 and 11, now the location of holes 14 and 15, have likewise been modified with changed greens and fairways that bear no resemblance to MacKenzie's layout. Indeed, Daniel Wexler argued that the original hole 10 was perhaps the course's best link, but its essential feature—a double fairway—no longer exists.
- Original hole 12, now the location of hole 18, has had sand traps removed from the design. In addition, original hole 13 (now 3), and original holes 14 and 15 (now the location of holes 8 and 2) described by Wexler as "not among the layout's finest" to begin with, have likewise had hazards reconfigured, as has the final original hole, 18 (now the location of hole 10).
- In addition, the theory of the course—the creation of a links-type, seaside course—was entirely upended when the berm was built separating the course from the ocean.

# THE America's Greatest Lost Golf Courses & Holes



SHARP PARK																				
400	274	423	120	338	168	383	398	538	3042	392	142	483	345	143	330	363	471	443	3112	6154
4	4	4	3	4	3	4	4	5	35	4	3	5	4	3	4	4	5	4	36	71



1943 aerial survey reveals a number of MacKenzie's original holes still intact, plus four newer ones built to the east. (National Archives)

# SHARP PARK GOLF COURSE PACIFICA, CA

Opened in 1931 / 6,154 yards Par-71

s today, some 65 years after his death, Dr. Alister MacKenzie remains perhaps the most celebrated golf architect in history, it is truly remarkable that two public courses he laid out in major American metropolises could have been so short-lived and poorly documented. Yet Bayside, as we have seen, labored in (and vanished into) almost complete obscurity—and it cannot even begin to compare with the briefly-lived legacy of San Francisco's Sharp Park.

MacKenzie's Sharp Park layout is surely one of golf architecture's most enduring mysteries. Owing to the fact that it was built in 1931, then washed into oblivion by a coastal storm shortly thereafter, its original design was seen firsthand by very few. Nor was this initial version in any way adequately recorded, with few photographs of any kind known to remain in existence. Further, a visit to today's 6,299-yard facility offers little; this vastly-altered layout serving mostly to make one wonder if a vintage MacKenzie design ever *could* have existed upon this site.

But the Doctor's original, located very much upon this same land, was all that its tantalizing prospects have suggested, a marvelous golf course featuring seaside holes, two double fairways, a large lake, and a cypress-dotted setting fairly reminiscent of Monterey. It was, in short, a municipal masterpiece.

Located just 10 miles south of downtown San Francisco, the site given to MacKenzie was uncommonly fine for a public facility, including a nearly 1,000-yard oceanfront stretch along Salada Beach. For a county whose public course facilities at Harding and Lincoln Parks were among the busiest in the nation, the development of Sharp Park was a godsend, but this wonderful property was not without its drawbacks.

For one thing, a fair amount of the land required shoring up with massive quantities of dredged sand in an expensive, Lido-like operation. Second, the site was partially divided by a small county road, a circumstance dictating that three of MacKenzie's back-nine holes be separated from their 15 brethen. Years later this road would be rerouted, though by that time the storm-driven reconfiguration of the golf course would still leave four newer holes separated, about the only commonality between MacKenzie's work and the course in play today.

The 1931 layout began with a dogleg-right par-4 of 400 yards, a strong but not especially memorable opener. But things changed quickly at the second, a 274-yard par-4 with alternate tees situated on either side of the first green. In what today might be referred to as "risk/reward" style, this nearly-driveable hole featured a large bunker front-right of the putting surface and a lake to the left of the fairway, creating the wonderful question of just how near the water one dared to venture in pursuit of an easier angle for his second.

The third was a long two-shotter of 423 yards, playing directly north along the beachfront. Again the risk/reward question was laid before us: play safely down the middle and deal with a front-right greenside bunker or aggressively skirt the beach in pursuit of an open second? Seaside winds generally affected play at Sharp Park greatly, bringing those most unlinkish of obstacles—trees—into play along the right side as well.

Following the short fourth, a precise pitch played along the lake's westward shoreline, one reached the first of the dual-fairway holes, the 338-yard fifth. Here the player's options were numerous with a "safe" left-side route leaving the most difficult second-shot, a dangerous lakefront fairway opening up a more direct line, or the all-out blast over everything leaving a mere pitch from a wide-open angle. As at the second hole, a second tee positioned left of the previous green served to create additional angles and variety.

The 385-yard seventh was the course's second and last seaside hole, playing directly south to a long, narrow green flanked on either side by sand. The slight angling of the putting surface again tempted one to drive close to the beach (particularly if the pin was cut back-left), but the lesser presence of trees at least made this tee shot a bit more forgiving.

The 398-yard eighth, though built with only one fairway, offered two very distinct lines of play. A drive aimed safely left was simple enough but set up a nearly all-carry approach across two front-left greenside bunkers. For the man capable of controlling a long fade, however, there was the option of skirting the treeline, a shot which, if brought off successfully, again yielded a more favorable approach.

Though one hesitates to name a best hole among so many good ones, the 392-yard 10th did

a fine job of nominating itself. Here was the double fairway concept played out to the fullest, the right side providing ample safety but a bunker-obscured second, the left requiring a gutsy tee shot to a water-guarded fairway but yielding a straight-on approach. Yet again, dual tee boxes varied the challenge from day to day, making the 10th a truly great hole—but an intimidating prospect for anyone hoping to slip past the starter and begin play on the back nine.

Following the 142-yard 11th came the long 12th, a 493-yarder distinctly reachable in two, provided one avoided several prominent trees and the out-of-bounds which ran down the entire left side.

Perhaps not surprisingly, the three holes exiled across the county road were not among the layout's finest, the 345-yard 13th being the best of the bunch with out-of-bounds also threatening its more-favored left side.

With the routing having returned to the clubhouse for a third time, one set out again at the 363-yard 16th, a par-4 following much the same path as today's first hole. Here a large mound punctuated the fairway some 175 yards off the tee, offering several different angles of play. The more difficult drive was the one aimed down the right side, close to a clump of trees. Naturally this choice also provided the better approach angle to a deep, narrow putting surface.

MacKenzie closed out Sharp Park with a pair of long finishers beginning with the 471-yard 17th. Though not a particularly difficult hole, this short par-5 often faced a strong sea breeze and featured out-of-bounds left, two bunkers, a meandering brook and a green laid precariously close to a rough, marshy depression. The 18th, by contrast, was a bit of a monster, its 443 yards requiring more brute strength than finesse, though the ability to draw one's tee shot would obviously have come in handy.

It was indeed unfortunate for Sharp Park that so many of its best holes fell along the property's ocean side, for it was this flank which took the brunt of any incoming storms. Following the early 1930s deluge that washed several of these gems out to sea, a massive berm was constructed (largely upon land once occupied by holes three and seven) to prevent history from repeating itself. The subsequent rerouting of the county road and reconfiguring of the lakeside holes has further muddled things so that today only a handful of holes run consistent with MacKenzie's originals, and no appreciable trace of his strategy remains in play.

# How Sharp Park Would Measure Up Today

Oceanfront holes, double fairways, MacKenzie bunkering, marvelous scenery...

Any way you look at it, even at only 6,154 yards, Sharp Park would have to stand well out in front as America's finest municipal golf course.

Restoration anyone?

### SHARP PARK

Being that the City had come by the lots at Sharp Park so cheaply(free in fact)they decided to bring in one of the world's foremost golf architects, Dr. Alister Mackenzie. The fact that Mackenzie and his assistant at that time, Jack Fleming, were able to design a golf course along the San Mateo County coast line was quite an accomplishment in itself. They managed to accomplish this difficult feat by dredging for fourteen months in order to build up the fairways.

On May 15, 1930 Robert Hunter, Jr. was appointed the superintendent of construction for Sharp Golf Course at a fee of \$750 for ten month's work. Four and a half months later on October 2, 1930 Willis Polk and Company was authorized to prepare plans and specfications for the starter's house at the golf course. The original cost of playing golf was \$2.00 per month and a card good for all three courses became available in May 1932 for \$5.00.

The courses's opening in 1932 was twice delayed due to wet conditions. The golf course officially opened April 1, 1932. Perhaps the fact that even the opening of the course had to be delayed twice due to winter rains should have warned of the drainage problems this site would always face. Normally a golf course will welcome the rest and revitalization the winter rains bring. In Sharp . Park's case the winter rains brought about the annual flooding of Laguna Salada out on to playable portions of the golf course. This problem still persists 47 years later even though a 4,000 gullin woth pump has been installed. Two factors contribute to the poor drainage problem at the Sharp Park site. First and foremost is the fact that the course is built at sea level and thus was susceptable to changing tides. The second factor was the annual flooding of Laguna Salada itself.

The golf course that opened on April 1, 1932 was becoming increasingly popular until it was severely damaged by high tides in a storm during the winter of 1938. The holes constructed on or near the beach were unindated by the unchecked tides of the storm. This resulted in severe damage to the beach holes - Numbers 2 through 8. The course, generally considered one of the best tests of golf in Northern California would never be the same. The beach holes had to be abandoned and reconstruction was forced across the Coast Highway up into what is now referred to as "The Canyon Holes". The effect was much the same as taking a house with a beach view and turning it 180 degrees to face a mountain slope. This was the most drastic architectural change the Sharp Park layout would ever face. Even the State Highway construction in the early 1960's that wiped out one par three hole would not have as damaging effect as nature.

Sharp Park remains very busy to this day drawing players both from the City and from down the peninsula. During the winter, however, as the water table rises, the course becomes less playable and suffers a significant drop in play - more so them other municipal courses during the winter. One winter in the early 1970's flooding was so thorough that the unchecked water nearly reached the clubhouse.



City and County of San Francisco Recreation and Park Department McLaren Lodge in Golden Gate Park

501 Stanyan Street, San Francisco, CA 94117

TEL: 415.831.2700 FAX: 415.831.2096 WEB: www.parks.sfgov.org

September 1, 2009

Honorable Julie Lancelle Mayor, City of Pacifica City of Pacifica City Hall 170 Santa Maria Avenue Pacifica, CA 94044

Michael Crabtree, Planning Director City of Pacifica Planning Department 1800 Francisco Blvd. Pacifica, CA 94044

Re: Proposed Designation of Sharp Park Golf Course as a Pacifica City Landmark

Dear Mayor Lancelle and Director Crabtree,

I am writing in regard to the City of Pacifica's application to designate the Sharp Park Golf Course a Historic Landmark under Pacifica Municipal Code, Chapter 7. We think this action is both inappropriate and unnecessary. Under California law, the City of Pacifica cannot regulate land use at Sharp Park which is owned by the City and County of San Francisco. (See, Cal. Govt. Code §§ 53090, et seq., *Akins v. County of Sonoma*, 67 Cal. 2d 185 (1967).) Therefore, any designation of the Sharp Park Golf Course as a historic landmark by the City of Pacifica will have no legal effect and, frankly is not helpful in furthering a legitimate public policy debate here in San Francisco.

We certainly recognize that Sharp Park Golf Course is used and enjoyed not just by many San Franciscans, but also by the residents of Pacifica, and that your City is concerned about any potential changes to it, and particularly to the golf course. As you may know Sharp Park is approximately 400 acres -- 237 of those acres are included in the San Francisco Recreation and Park Department's Significant Natural Resource Areas Management Plan (SNRAMP). This Plan is currently undergoing environmental review under the California Environmental Quality Act. We appreciate the historic and cultural value of the golf course, and an evaluation of the effects of the SNRAMP on the golf course as a potential historical resource will be included in the SNRAMP EIR.

As you also likely know, the area around the Sharp Park Golf Course contains habitat that support two special status species: San Francisco garter snake (*Thamnophis sirtalis tetrataenia*), listed as endangered under the federal Endangered Species Act, and classified as a fully protected species under California Fish and Game Code § 5050; and the California red-legged frog (*Rana draytonii*), listed as threatened under the federal Endangered Species Act and a state species of special concern. Under federal and state law, the City and County of San Francisco must ensure that the golf course operation does not endanger or harm either of these species. Recently, the San Francisco Board of Supervisors enacted legislation directing the Recreation and Park Department to develop a plan for



restoring the habitat for the garter snake and red-legged frog in conformance with federal and state law. Currently, we are preparing option plans, including schedules and costs for presentation to the public and to the Board which we hope to have preliminarily completed in October 2009.

We take our stewardship responsibilities at Sharp Park very seriously. In a very difficult financial climate, we must manage the recreational, cultural and biological uses of the park in a manner that best balances legitimate recreational needs with our fiduciary and legal responsibility to protect the habitat. We will continue to include the City of Pacifica in our discussions as we evaluate plans Sharp Park's future.

truly yours

Philip A. Gihsburg General Manager

cc: Mayor Gavin Newsom Members of the Board of Supervisors City Attorney Dennis Herrera Members of the Recreation and Park Commission



# **United States Department of the Interior**

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

IN REPLY REFER TO:

L1415 (GOGA-PLAN)

July 20, 2009

Mr. Michael Crabtree Planning Director 170 Santa Maria Avenue Pacifica, CA 94044

Re: Proposed Historic Landmark Designation for Sharp Park Golf Course. HLD-6-09

Dear Mr. Crabtree:

Enclosed is our statement regarding the proposed action above. Please make this part of the July 20, 2009 City of Pacifica Planning Commission hearing. If you have any questions, contact Nancy Hornor at (415) 561-4937.

Sincerely,

1 lank 1

Frank Dean Acting General Superintendent

Enclosure:



# United States Department of the Interior

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

IN REPLY REFER TO:

# NPS Statement on Pacifica Landmark Designation for Sharp Park

July 20, 2009

We learned of the City of Pacifica's proposal to designate Sharp Park Golf Course as a Pacifica Historic Landmark when we received the public hearing notice. We were not notified of this proposal through the Pacifica GGNRA Advisory Committee, which was set up by the Pacifica City Council to discuss items pertinent to both bodies.

As you know, Sharp Park is within the boundary of the Golden Gate National Recreation Area and adjacent to lands that we manage at Sweeney Ridge and Mori Point. We are currently completing a multi-year restoration project at Mori Point, to protect the Endangered San Francisco Garter snake and the threatened Red-legged frog and provide for compatible recreation and community stewardship and educational activities. Therefore, we have an interest in the future of Sharp Park.

Although we concur that the golf course and club house, as well as the remains of the WWII intermnent camp, should be evaluated, we request that you not make a landmark designation without a professional assessment of the significance and integrity of the property. We can assist with such an evaluation and would like to work with City of Pacifica and the City of San Francisco to define an appropriate process that includes all stakeholders.



October 27, 2011

Bill Wycko Environmental Review Officer Planning Department City of San Francisco 1650 Mission Street, Ste 400 San Francisco, CA 94103-2479

# RE: Sharp Park Golf Course – Historic Resource Evaluation

Dear Mr. Wycko,

I have reviewed Appendix C of the DEIR for the Significant Natural Resource Areas Management Plan: Sharp Park Golf Course and question the determination of eligibility for listing on the National Register of Historic Properties (NRHP). On page 5-4 the author suggests that Sharp Park Golf Course has historic significance under Criterion A and C under the NRHP and Criterion 1 and 3 for the California Register of Historic Resources (CRHR). Criterion C/3 requires that "a property embody the distinctive characteristics of a type, period, or method of construction that represents the work of a master, or that possesses high artistic values". Based on the number and extent of alternations that have taken place since the period of significance (1929 – 1932) I question the validity of finding Sharp Park eligible as a historic resource.

Bulletin 18 "How to Evaluate and Nominate Designed Historic Landscapes,"<sup>1</sup> states "As defined by the National Historic Preservation Act of 1966 and the National Register criteria, to be eligible for the National Register a designed historic landscape must possess significance ..... and integrity of location, design, setting, materials, workmanship feeling and association." Sharp Park Golf Course lacks integrity.

The Historical Resources Evaluation Report (HRER) prepared by Tetra Tech, Inc. describes many alterations made to the course since 1932. Comparing the course layouts depicted in the two exhibits included in the Evaluation Report<sup>2</sup> one finds very few similarities between how the course was designed and how it exists today.

Chris Cathy Christopher Pattillo Garrett Kent

444 - 17<sup>th</sup> Street Oakland CA 94612 Tel 510.465.1284 Fax 510.465.1256

<sup>&</sup>lt;sup>1</sup> National Park Service, "How to Evaluate and Nominate Designed Historic Landscapes," National Register Bulletin No. 18, p. 6.

<sup>&</sup>lt;sup>2</sup> The original Sharp Park Golf Links plan prepared by Mackenzie, Hunter & Egen (Figure 3) and the aerial of the Existing Golf Course (Figure 2).

- 1. The original hole 1 (now hole 11) was a long, straight shot. The reconfigured hole doglegs to the right.
- 2. The original hole 2 (now hole 12) was a dogleg that wrapped around the south end of the course. Hole 12 is now a lot shorter with no dogleg.
- 3. The original holes 3, 4, and 8 were destroyed in a big storm and not replaced.
- 4. The original hole 5 offered multiple fairway options a unique design feature of Mackenzie. Hole 17 which replaced 5 is a single straight shot.
- 5. The original hole 6 that ran east-west at the north boundary no longer exists.
- 6. The original hole 7 appears to be similar to current hole 16 identified on Figure 2 as having been built after 1941, after the period of significance.
- 7. The original holes 9 and 10 each offered double fairways. The replacement holes 13 and 14 eliminated these special features.
- 8. The original hole 11 a short run appears to be similar to current hole 15.
- 9. The original hole 12 was a long straight shot. It has been replaced by hole 18 that is longer with a dogleg.
- 10. The original holes 13, 14 and 15 were on the east side of the county road and generally paralleled the road running north-south. Today this area has four holes that all run east-west.
- 11. The original hole 16 was a dogleg left replaced by hole 3 a straight shot.
- 12. The original hole 17 ran east-west and was a long shot with a dogleg. Hole 8, a short, straight fairway replaced it.
- 13. The original hole 18 was a dogleg. This hole has been replaced by hole 2, a straight shot.

In summary only hole 11 (now hole 15) is similar to the original design. The layout of the remainder of the course has been substantially altered. The change to the order of how the holes are played is significant as it materially alters the sequence and nature of views the player experiences making it unlike what was intended by the designer. Other major changes implemented since the period of significance include:

- A. Elimination or reconfiguration of several sand traps.
- B. Construction of a seawall in 1941 to prevent flooding of the golf course. This eliminated views to the beach and Pacific Ocean and the essence of the links design concept.
- C. Filling a portion of the lagoon as part of the reconfiguration of hole 10.
- D. Installation of concrete golf cart paths along the back nine holes in 1996 where none existed previously.
- E. Culverting of water features on five holes and the elimination of water hazards an important component of the original design.
- F. Installation of a 4000-gallon pump to help with annual flooding of Laguna Salada.
- G. Alternations made between 1985 and 1994 to accommodate female players such as shortening of the fairways.
Adding together all of these alterations it is apparent that Sharp Park Golf Course lacks sufficient integrity to qualify as a historic resource under criterion C/3. The course no longer reflects the work of Alister Mackenzie. The land use remains a golf course but otherwise there are few similarities between the course that existed during the period of significance and what remains today.

The Evaluation Report notes that Alister Mackenzie attained status as a master golf course architect. Appendix C on page 4-7 notes, "George Shackelford, in his book *Grounds for Golf*, describes Mackenzie as a master designer and offers that Mackenzie's secret to creating unique courses was <u>his talent for routing</u>." Regrettably, today nothing remains of Mackenzie's unique routing. He continues to explain that his work "was known for its original and distinctive bunkers, with irregular shapes and each with its own design." And "Distinctive bunkering, the use of small hillocks around greens, and exciting hole locations were Mackenzie's trademark".

Another of Mackenzie's trademarks was his talent for working with natural landform and subtlety integrating his courses with a site's topography to take full advantage of the unique qualities of each site. Quoting from the HRER, "Mackenzie felt that the success of golf course construction depended entirely on making the best use of natural features and devising artificial ones indistinguishable from nature." The HRER continues with, "..... while many architects try to create a special course, Mackenzie could figure out how best to fit holes into a property and situate a golf course to evoke a comfortable, settled, connection to the ground. His course routings are always functional and original but rarely do they fight the contours of the property."

In summary, defining characteristics of Mackenzie's design style included unique course routing, a talent for adapting a course to fit the land, an ability to offer challenge to players of varying skill levels, distinctively designed bunkers, and inclusion of multiple fairway options – offering advantage to those to took greater risks in their play. The vast majority of these features have been eliminated from the course. According to Wexler, in a recently published article "no appreciable trace of his strategy remains in play."<sup>3</sup>

Unfortunately, Sharp Park Golf Course began to fail even before the course opened in 1932 because Mackenzie failed to fully understand the forces of nature at this site. Page 4-3 of the Evaluation Report notes that the opening was delayed twice due to "drainage problems on the course due to winter rains." Shortly after the course opened a major storm washed out a large portion of the course and necessitated construction of the seawall in 1938 intended to prevent similar damage in the future. This type of damage has continued – as recently as 1982 a major storm wiped out several holes. In 1990 another breach killed many of the cypress trees on the course. Few of the golf courses designed by Alister Mackenzie remain intact today. It would be ironic and misplaced if this course – one that represents a failure in design – became a lasting representative of his life's work by being officially designated as a historic property.

<sup>&</sup>lt;sup>3</sup> Dr. Alister Mackenzie, "Sharp Park Golf Course", Pacifica, CA page 113

The determination of historic significance is tied to a site's level of integrity. According to A Guide to Cultural Landscape Reports: Contents, Process, and Techniques<sup>4</sup> "The historic integrity of a cultural landscape relates to the ability of the landscape to convey its significance." And "Historic integrity is assessed to determine if the landscape characteristics and associated features, and the spatial qualities that shaped the landscape during the historic period of significance, are present <u>in much the same way as they were historically.</u>" Emphasis added.

The guide continues, "Historic integrity is determined by the extent to which the general character of the historic period is evident, and <u>the degree to which incompatible elements</u> <u>obscuring the character can be reversed</u>". In the case of Sharp Park Golf Course the changes to the course were not the result of the normal evolution of a living landscape – maturing trees and other plantings, but rather major changes that were forced to solve functional problems that resulted from flaws in the original design – a failure to fully understand the power of nature and it's ability to wreak havoc. The changes made to Sharp Park Golf Course cannot be reversed because doing so would recreate the conditions that necessitated that the alterations be made in the first place.

Page 5-2 of the HRER notes, "Because landscape features change over time, a landscape need not retain all of the original features it had during its period of significance, <u>but it</u> <u>must retain the essential features and characteristics that make its historic character</u> <u>clearly recognizable."</u>

In essence for a site to meet the criteria of historic significance most of the designed features must look as they did during the period of significance. This may be true for the Clubhouse and maintenance building which are not addressed here, but it is not the case at Sharp Park Golf Course and no doubt explains why "None of the state or national registers identified Sharp Park Golf Course as a historical resource" as noted on page 4-1 of the HRER.

By making the finding that the existing golf course represents a historic resource under criterion C/3 it seems that Tetra Tech failed to appreciate not only the subtleties of golf course architecture but its essential features. Just because there was a golf course present in 1932 the fact that there is still a golf course present today, does not qualify the current course as a historic resource.

<sup>&</sup>lt;sup>4</sup> A Guide To Cultural Landscape Reports: Contents, Process and Techniques by Robert R. Page, Cathy A. Gilbert, and Susan A. Dolan, US Department of the Interior, National Park Service, Cultural Resource Stewardship and Partnerships, 1998.

Sharp Park Golf Course lacks integrity. While a golf course at this site is consistent with the historic land use, that fact is insufficient evidence for a finding of historic significance. Failure to demonstrate significance voids eligibility for historic resource status. I urge you to consider this as you plan for the future use of Sharp Park.

Sincerely,

Cha. S. Pretier

Chris Pattillo, ASLA Historic Landscape Architect President, PGAdesign<sup>inc</sup>

## CHRIS PATTILLO

HISTORIC LANDSCAPE ARCHITECT

### **PROFESSIONAL EXPERIENCE**

PGAdesign<sup>inc</sup>, 1979 to present

### **EDUCATION - REGISTRATION**

Master of Landscape Architecture, 1975, UC Berkeley Bachelor of Arts, 1972, UC Berkeley California Landscape Architect, #1925

### ASSOCIATIONS

Historic American Landscapes Survey (HALS), No. California Chapter, Co-Founder 2004, Chair 2004-2009 & Vice Chair 2010
American Society of Landscape Architects (ASLA), Member
ASLA Historic Preservation Professional Practice Committee, National Chair & Vice Chair 2006-2009
California Genealogy Society, Vice President & Board member 2010
Garden Conservancy, Member
California Preservation Foundation, Member
National Trust, Member
Oakland Heritage Alliance, Member
Oakland Chamber of Commerce, Member
Oakland Chamber of Commerce Economic Develop Committee
Open Space, Conservation & Recreation Elements (OSCAR), Advisory Committee

### AWARDS

Oakland Chamber of Commerce: "Small Business of the Year" 1995 Oakland Chamber of Commerce: "Woman Owned Business of the Year" 2000

### RELEVANT PROJECT EXPERIENCE

Badger Pass Ski Area CLR, Yosemite Natl. Park, CA Doyle Drive in San Francisco Presidio HALS, San Francisco, CA Atchison Village HSR, Richmond, CA Meyers Estate Garden Master Plan & Maintenance Guidelines, Union City, CA Roeding Park HALS, Fresno, CA Sakai-Oishi Nurseries HALS, Richmond CA William Land Park Cultural Landscape Survey & Evaluation, Sacramento Berkeley City Club Gardens HALS, Berkeley, CA

### PUBLICATIONS

"Preparing a Historic American Landscapes Survey (HALS) History: Brief Guide to Identifying and Documenting HALS Sites," co-author, National Park Service, US Dept of the Interior, Washington DC, August 2010

"Doyle Drive: Using Innovation HALS Methodology," SF Heritage News, Vol. XXXVII, No. 2, Summer 2010

"Innovation HALS Methodology Developed for SF Presidio Project," CPF News, Summer 2009

### PRESENTATIONS

Documenting our Heritage, Annual ASLA conference, San Diego, California, October 2011

Historic American Landscapes Survey – An Introduction, for ASLA Chapter Presidents, October 2011

Exploring Cultural Landscapes through Case Studies, California Preservation Foundation (CPF), August 2010

Historic American Landscapes Survey – An Overview, American Society of Landscape Architects (ASLA), July 2010

Doyle Drive HALS at the Presidio of San Francisco, CPF, May 2010

Landscape Within The Historic Context, American Institute of Architects (AIA) Historic Resources Committee, San Francisco, CA, June 2009

Historic American Landscapes Survey – Tools of Preservation, UC Berkeley Extension, Landscape Architecture Program, May 2009

Alviso Adobe Park: History & Design Process – Opening Remarks, Pleasanton, CA, October 2008

Historic American Landscape Survey – A Panel Discussion, ASLA Annual Conference, San Francisco, CA, October 2007

Olmsted in the East Bay – tour leader & speaker, ASLA Annual Conference, San Francisco, CA, October 2007

Oakland Waterfront Parks – tour speaker, ASLA Annual Conference, San Francisco, CA, October 2007

Historic American Landscapes Survey – An Overview, Oakland Heritage Alliance (OHA), Oakland, CA, Summer 2007

Historic American Landscapes Survey – An Overview, Town & Gown Club, Berkeley, CA Spring 2007

Cleveland Cascade – Rehabilitation of a Howard Gilkey Landscape, OHA, Oakland, CA, March 2007

Making a Splash: Preservation of Pools and Fountains, CPF Conference, Sacramento, CA, April 2006

Peralta Hacienda Historical Park – Planning and Design, Friends of Peralta Hacienda, Oakland, CA, December 2005

Kaiser Roof Garden and the Gardens of the Museum of California: Comparing Two Mid-Century Modern Roof Gardens, OHA, Oakland, CA, July 2005

Planning and Public Policy: The Urban Planning Process, Department of City & Regional Planning, UC Berkeley, April 1983

### HISTORIC AMERICAN LANDSCAPES SURVEY (HALS) NOMINATION FORMS

Anderson Marsh State Historic Park, Lake County, 2011 Berkeley Women's City Club, Berkeley, 2011 Bidwell Mansion, Chico, 2011 Bidwell Park, Chico, 2011 Boyd Memorial Park, San Rafael, 2010 California Nursery Company Historic Park, Niles, 2008 Call Ranch at Fort Ross State Park, Jenner, 2009 Captain Fletcher's Inn & Manager's House, Navarro, 2009 Centerville Pioneer Cemetery, Fremont, 2008 Children's Fairyland, Oakland, 2009 China Camp State Park, San Rafael, 2009 Fern Dale (Shaw House), Ferndale, 2009 Forest Theater, Carmel, 2010 Henry H. Meyers Garden, Union City, 2010 La Mirada Adobe, Monterey, 2010 Marin Art and Garden Center, Ross, 2009 McConaghy Estate, Hayward, 2009 Meek Mansion & Carriage House, Hayward, 2009 Mendocino Woodlands Demonstration Recreation Area, Mendocino, 2009 Micke Grove Park, Lodi, 2009 Mountain View Cemetery, Oakland, 2010 Point Arena Cove, Point Arena, 2010 Point Arena Lighthouse, Point Arena, 2010 Point Cabrillo Lighthouse, Casper, 2009 Rancho Higuera Adobe Historical Park, 2008 Ravenswood Estate, Livermore, 2009 Robson-Harrington Park, San Anselmo, 2009 Shibata Japanese Garden (Mount Eden Nursery), Hayward, 2010 Shinn Historical House & Arboretum, Fremont, 2008 Sun House, Ukiah, 2009 Tor House, Carmel, 2010 Wassama Village, 2010



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# Wild Equity Institute

Home » <u>News</u> » SF Historic Preservation Commission: Sharp Park Golf Course Lacks Historic Integrity

# **SF Historic Preservation Commission: Sharp Park Golf Course Lacks Historic Integrity**

06 October 2011 - 22:38
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See also:

• <u>Restore Sharp Park</u> – <u>Latest News</u>

In a stunning rebuke to golfers grasping to keep San Francisco subsidizing suburban golf in San Mateo County, on September 21, 2011 San Francisco's Historic Preservation Commission stated that it does not concur that Sharp Park Golf Course is an historic resource.



Watch this annotated audio excerpt of the Historic Preservation Commission hearing.

Sharp Park Golf Course has been losing money and killing endangered species for many years. In September <u>Supervisor John Avalos introduced legislation to transform Sharp Park into a new national park</u>, while providing Sharp Park's current golfers with additional access to affordable golf courses in San Francisco.

But golf privatization groups who oppose national parks convinced San Francisco's Recreation and Parks Department to make-up a case that Sharp Park Golf Course should be protected as an historic resource under the California Environmental Quality Act. As part of this process, the Department asked the Historic Preservation Commission to rubber-stamp its proposal.

However, the Commissioners reviewed the proposal and raised several objections to the Recreation and Parks Department proposal. Led by Commissioner Alan Martinez—who explained that the existing golf course is "a fragment of what it once was"—the Commission could not reach consensus on the golf course's integrity, and unanimously voted that "the commission did not concur on the integrity of the golf course."

The Wild Equity Institute is working with dozens of community, environmental, and history organizations to ensure that the California Environmental Quality Act and San Francisco's historic preservation laws aren't abused by golf privatization groups. The next step in this process is to ensure that the Planning Commission evaluates Sharp Park separately from other natural areas in San Francisco that are undergoing environmental review. Keep your eyes and ears peeled for more updates in the coming weeks.

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## Historic Photos, Field Notes Show Sharp Park Has Always Been Habitat for Herps--and the Golf Course is Harming Them

19 July 2010 - 18:58

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See also:

• <u>Restore Sharp Park</u> – <u>Latest News</u>

Rediscovered <u>historic photos of Sharp Park</u>, along with <u>field notes</u> stored at <u>UC Berkeley's Museum of</u> <u>Vertebrate Zoology</u>, indicate that Sharp Park was once excellent habitat for the <u>San Francisco garter</u> <u>snake</u> and the <u>California red-legged frog</u>: and that Sharp Park Golf Course is the primary threat to both species at the site.

This undated photo of Sharp Park shows Laguna Salada before the golf course was built, with Mori Point Ridge in the background.



In this photo, the lagoon is clearly fringed with cattails, vegetation that can't grow in saline environments. This indicates that Laguna Salada was not a "salt lake" as golf privatization advocates have argued, but a fresh lagoon where the <u>San Francisco garter snake</u> and the <u>California red-legged frog</u> could thrive.

At least until Sharp Park Golf Course was built. The earliest systematic biological surveys of San Mateo County were conducted by Dr. Wade Fox—the man who would eventually scientifically describe the San Francisco garter snake—when he was a graduate student at UC Berkeley. Although he died in his prime, Dr. Fox's field notes have been preserved at the UC Berkeley Museum of Vertebrate Zoology. These notes have finally been digitized, and they show that in 1946 Dr. Fox found a dead San Francisco garter snake at Sharp Park, which he concluded was "probably killed by golfers—they probably die frequently in this manner." Presaging the species precipitous decline, Dr. Fox also noted that the only secure area remaining for the species at Sharp Park was in the wet grasses near the lagoon: the surrounding golf links were deadly to the species.

5. Thermostic suitalis Sharp parts, San mater Co, Cali anow harden of gran and week of the edge of the loke is the andy - the snoher - We for place fo I are, perhody hilled tog galfers - They peled die Juquently in the april 13 Dilla Beach, marin Co., Cali Jalog 2 form I no sutatio aco pool in the pastice. The strong, caf " the ocean was perbookly to cald far them. None were in right, n I under sen port even though the eneral endineider to be found there. Up he stream from this pool I fam da mall sintales of second ardinaide us and . But this was protected from ind and recorner In the res you the hill I saw a larger ser est an the mater - while me undidate beneoth the A unenestry + stick I cat of the unater. on the into beach sauch of the cattages at the head chetter from the wind , and were facing The sum so that they cauld reasing at kind angle the radiation from the see

The <u>San Francisco garter snake</u> is now on the brink of extinction, and is probably the most imperiled vertebrate species on the San Francisco Peninsula. Yet since the 1940s Sharp Park Golf Course has been killing this species, and more recently the Golf Course has been found killing both the <u>San Francisco</u> garter snake and the <u>California red-legged frog</u>. We can do better: let's restore Sharp Park and build a better public park on the property. Find out how you can help restore Sharp Park <u>here</u>.

<u>Edit</u>

### Comments

There are no comments so far.

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415-349-5787

#### Summary for recommending A 18

Karen Swaim to: Munro, David

Cc: Lisa Wayne, Dawn Kamalanathan, Jeff Mitchell, Tammy Lim

History:

#### Comments?

Munro, David wrote: > See a few comments below. > > > From: Lisa Wayne [mailto:Lisa.Wayne@sfgov.org] > Sent: Monday, December 07, 2009 7:56 PM > To: Dawn Kamalanathan > Cc: kswaim@swaimbio.com; Munro, David > Subject: notes on 30+ > No disputing sea level rise and salt water intrusion will occur on time frame of 30+ years (confirm year) > Sea level rise will reduce the capacity of sharp park to function as a freshwater wetland that will support frogs and snakes and may not be conducive to golf either. > The main limiting factor for sfgs under sea level rise is a reduction in the amount and quality of freshwater habitat that provides a critical food source for the snake. > Based on most conservative predictions of sea level rise, the majority of sharp park west of highway 1 will not support freshwater wetlands in the long term . > Therefore must think and work regionally (not just sharp) about opportunities to create secure freshwater wetlands on the 30+ year time scale. For exmaple GGNRA land and Calera Creek. > 30 years = approxiamte life of capital improvements including golf course and sea wall. Also the planning horizon for the Alternatives Report. The alternatives report was not intended to assess the intregrity of the sea wall. This study is being done under separate contract. For the purposes of the recovery action, it had to be assumed that the sea wall was either in good enough shape to hold for the planning horizon, or it would be modified as needed to last for the planning horizon. > > Now > > Species are at risk of local extinction now. Planning for creating wetlands eastward of the current location would likely be a long process and very difficult from a permitting standpoint and would not meet the goals of connecting habitat to Mori Point. There might also be legal challenges associated with moving the sea wall. Meanwhile, the population of the SFGS would continue to decline. > Must do what we can with what is available now to bolster snake populations immediately. The best opportunity to augment snake population quickly is to

```
make Laguna Salada a functioning system for the snake.
>
> Once thriving population of snake in region, next step to buffer
> against physical changes to sites (i. e., climate change, sea level rise,
salt water intrusion)
> The wetland complex at sharp park is not expected to provide habitat in
perpetuity.
>
>
>
> Lisa Wayne
> San Francisco Recreation and Park Department
> Natural Areas Program / Neighborhood Service Area 10
> 831-6326
>
> 30+ Notes
>
>
_ _
Karen Swaim
President/Herpetologist
Swaim Biological, Inc
4435 First Street, PMB # 312
Livermore, CA 94551-4915
925.455.8770 phone
925.455.6106 fax
             92a
Attachment 4-1928 Pre-golf aerial photo.pdf A18 Recommendation.docx Attachment 2-Mori Sharp Park Linkage Width.pdf
            eta
Attachment 3-WOB Habitat Linkages.pdf
```

### Financial Appraisal of Sharp Park Golf Course 2005 - 2015

### **Executive Summary**

- Revenue levels over the last ten years have been volatile and it is questionable whether even significant investment in Sharp Park Golf Course would result in revenue growth.
- Sharp Park Golf Course has been loss making for nine out of the last ten years. This has resulted in over \$1.1 million of loss for the City of San Francisco.
- Documentation provided in support of expenses for Sharp Park, indicate that there could be significant inaccuracies in the financial reporting of operating expenses on the Revenue and Expenditure Reports.
- Since 2005 \$7.9 million has been spent on water and irrigation projects for Sharp Park Gold Course. It does not appear that the depreciation for these expenditures has been included in the Revenue and Expenditure Reports. On this basis, it would appear that a major expense may have been omitted in the Revenue and Expenditure Reports.

### **Operating Revenue Review**

- As illustrated in the graph and table below, operating revenues over the last ten years have highly been volatile.
- The volatility of the revenue makes it challenging to predict whether any investment in the Sharp Park would result in a significant increase in revenue.
- For the purposes of this analysis, revenue from golf green fees, concessions and golf resident cards was included. Interest income and income from the General Fund was excluded as these were not considered to be operating revenue streams.



### **Profitability Review**

- The Sharp Park Golf Course is not profitable. As shown in the table below, Sharp Park has been loss making for nine out of the last ten years and has resulted in \$1,147,064 of loss for the City of San Francisco.
- As discussed above, it is unclear whether any additional investment would increase revenue and return the park to profitability.
- We note that expenses such as 'Equipment' appear to be very low and may be understated in the reports provided by Recreation and Park Department.
- For the purposes of this analysis, we utilized data from the Revenue and Expenditure Reports provided by the Recreation and Park Department.

	-	-	-	-	r	1	1	r		r	7	_
Description	FY 04/05	FY 05/06	FY 06/07	FY 07/08	FY 08/09	FY 09/10	FY 10/11	FY 11/12	FY 12/13	FY 13/14	FY 14/15	Total
ACTUAL REVENUES:	¢ 002.452	¢ 700.050	¢4.000.400	¢4 400 400	¢1 000 110	¢1.000.000	¢ 000.045	¢4.000.000	¢4 040 E40	¢4 400 004	¢ 000 000	¢ 11 055 101
Goli Green Fees	\$ 693,152	\$ 708,852	\$1,088,192	\$1,128,498	\$1,202,113	\$1,080,889	\$ 639,215	\$1,008,232	\$1,013,548	\$1,128,801	\$ 963,939	\$ 11,055,431
Concessions	142,767	134,043	164,895	155,883	113,568	94,457	76,180	73,048	79,294	89,280	84,587	1,208,001
Golf Resident Card	1 005 010	0.40,005	1 050 007	1 004 004	41,031	59,498	53,340	52,116	58,609	53,827	46,043	364,465
	1,035,919	842,895	1,253,087	1,204,301	1,330,712	1,234,644	908,735	1,133,390	1,151,451	1,271,908	1,094,569	12,027,090
OPERATING EXPENDITURE:												
Salaries	535.254	546.411	603.005	719.891	643,193	595,412	450,135	536.277	451.926	551.587	583.187	6.216.278
Fringes	128,461	148,124	162,151	183,411	167,128	179.854	169.829	224,919	190,582	235.694	254,736	2.044.889
Overhead	227,966	230,738	281.366	290.313	282,684	336,433	229,954	260,105	224,002	220.011	221.817	2.805.388
Professional & Special Services	1,193	62.522	4.800	59,114	54,486	49,253	58,238	48.233	58,973	56.207	37,169	490,188
Maintenance Services	-	-	-	-	-	-	42.819	36,432	43,753	29.888	32.576	185,468
Rent/Leases Equipment	99	-	-	-	-	1.154	1,182	1.713	2,176	1.945	1.651	9.920
Other Expenses	10,194	22,209	35,678	51,823	62,005	45,893	17,652	18,941	29,720	17,830	18,395	330,341
Materials & Supplies	39,785	50,727	94,857	64,582	56,404	74,092	64,357	81,992	67,731	74,777	67,181	736,484
Equipment	-	-	40,670	-	-	30,137	-	-	-	-	-	70,807
Services of other Deptartments	45,975	39,787	36,736	35,989	32,827	39,344	70,563	96,874	108,907	107,642	114,968	729,613
TOAL OPERATING EXPENDITURE	988,929	1,100,518	1,259,262	1,405,122	1,298,727	1,351,572	1,104,729	1,305,486	1,177,771	1,295,582	1,331,680	13,619,378
OTHER EXPENDITURE												-
Facilities Maintenance	86,969	30,039	32,440	-	-	-	-	-	-	-	-	149,448
Audit	174	164	347	348	-	-	-	-	-	-	-	1,032
Controller Adjustment	-	-	-	-	-	-	-	5,104	-	-	-	5,104
TOTAL OTHER EXPENDITURE	87,143	30,203	32,787	348	-	-	-	5,104	-	-	-	155,584
								-				-
TOTAL EXPENDITURE	1,076,072	1,130,721	1,292,049	1,405,470	1,298,727	1,351,572	1,104,729	1,310,590	1,177,771	1,295,582	1,331,680	13,774,962
Operating Profit / (Loss)	\$ (40,153)	\$ (287,826)	\$ (38,962)	\$ (121,090)	\$ 57,985	\$ (116,727)	\$ (135,994)	\$ (177,193)	\$ (26,319)	\$ (23,674)	\$ (237,111)	\$ (1,147,064)
Notes:												
1 Golf Resident Card revenue and expe	nses were app	portioned to e	ach course a	ccording to th	at course's %	contribution	to golf fund al	located reven	les and alloca	ated operating	expenditures	s, respectively.
2 General Fund Support was removed f	rom revenue.											
3 Interest earned was removed from rev	enues as it do	es not repres	ent an operat	ing revenue								
4 Repayment to Open Space Fund was	s eliminated.											
Source: San Francisco Recreation & Pa	ark Dept.Golf F	Revenue & Ex	penditure Rep	orts								

### Accuracy of Expenses

- We requested documentation from the Recreation and Park Department to verify operating expenses included in the Revenue and Expenditure Reports. We were provided with payroll documentation for 2014 and 2015 in support of Sharp Park payroll costs. We were not provided with adequate documentation to review the reliability of other expenses.
- The supporting payroll documentation provided indicated that payroll expenses may have been significantly understated in the financial year 2014/2015. As shown in the table below, annual salary costs were listed as \$583,187, however, the payroll data indicates that actual costs were \$982, 495.
- As inaccuracies have been observed in the presentation of payroll expenses, it is possible that other operating expenses included in the Revenue and Expenditure Reports have also been understated.

• On this basis, it is possible that the losses generated by Sharp Park may have been significantly understated and the cost to the City of San Francisco of operating Sharp Park may be higher than stated on the Revenue and Expenditure Reports.

Month		Salary	Fringe			
Jul-14	\$	45,867	\$	21,100		
Aug-14		384,816		157,758		
Sep-14		48,393		20,904		
Oct-14		50,669		21,661		
Nov-14		45,898		20,963		
Dec-14		48,022		20,855		
Jan-15		47,887		23,058		
Feb-15		73 <i>,</i> 803		27,378		
Mar-15		61,460		24,806		
Apr-15		48,153		21,259		
May-15		45,247		21,641		
Jun-15		82,279		36,588		
Total	\$	982,495	\$	417,971		
Per 2014/2015	\$	583,187	\$	254,736		
<b>Budget Reports</b>						
Source: Payroll report provided by San						
Francisco Recreation and Park Department						

### Accounting for Capital Expenditure

- Data extracted from the Monthly Capital Reports generated by the Recreation and Park department, show that since 2005, \$7.9 million has been spent on capital water and irrigation projects for Sharp Park Gold Course (see the table below).
- Per GASB Statement No. 34, capital assets should be depreciated over their 'useful life'. As a result, we would expect to see an amount for depreciation included in the Revenue and Expenditure Reports to account for the capital expenditures on water and irrigation systems.
- As depreciation for these expenditures does not appear to have been included in the Revenue and Expenditure Reports, it is possible that a major expense may have been omitted in the Revenue and Expenditure Reports.

Fiscal Year	Capital Plan Project Name		Budget		Expended
2005-2006	Lincoln and Sharp Irrigation	\$	620,977	\$	620,977
	Sharp Park Water Tank		125,414		125,414
			746,391		746,391
2006-2007	Lincoln and Sharp Irrigation		620,977		620,977
	Sharp Park Water Tank		125,414		125,414
			746,391		746,391
2007-2008	Lincoln and Sharp Irrigation		620,976		620,976
	Sharp Park Water Tank		125,414		125,414
			746,390		746,390
2008-2009	Lincoln and Sharp Irrigation		620,976		620,976
	Sharp Park Water Tank		125,414		125,414
			746,390		746,390
2009-2010	Lincoln and Sharp Irrigation		620,976		620,976
	Sharp Park Water Tank		125,414		125,414
			746,390		746,390
2010-2011	Lincoln and Sharp Irrigation		620,976		620,976
	Sharp Park Water Tank		125,414		125,414
			746,390		746,390
2011-2012	Lincoln and Sharp Irrigation		620,976		620,976
	Sharp Park Water Tank		125,414		125,414
			746,390		746,390
2012-2013	Lincoln and Sharp Irrigatior		620,976		620,976
	Sharp Park Water Tank		125,414		125,414
	Sharp Park Recycled Water Project		343,939		332,465
			1,962,133		1,950,659
2013-2014	Lincoln and Sharp Irrigation		620,976		620,976
	Sharp Park Water Tank		133,170		131,358
	Sharp Park Recycled Water Project		343,939		343,909
	Sharp Park Golf Course Irrigation Retrofit		200,000		
	Sharp Park Infrastructure and Pumphouse		359,638		259,729
			1,657,723		1,355,972
2014-2015	Lincoln and Sharp Irrigation		620,976		620,976
	Sharp Park Water Tank		133,170		131,358
	Sharp Park Recycled Water Project		343,939		343,909
	Sharp Park Golf Course Irrigation Retrofit		549,000		490,578
	Sharp Park Infrastructure and Pumphouse		1,209,684		400,880
	Sharp Park Pump Replacement		850,000		507,896
			3,706,769		2,495,597
- ·- ·		<u> </u>		_	
Grand Total		Ş	12,551,357	Ş	11,026,960
Less: Lincon	Park Allocation (50% of Irrigation Costs)	\$	(3,104,881)	\$	(3,104,881)
Total Sharp I	Park Expenditure	\$	9,446,476	\$	7,922,079

### **Author Credentials**

- I am an Associate member of the Institute of Chartered Accountants of England and Wales (UK equivalent to CPA) with five years of experience in forensic accounting and international financial litigation.
- I have significant experience in:
  - Assessing and critiquing the reasonableness of financial forecasts and business projections by reviewing financial accounts, internal accounting data, budgets and industry data,
  - o Investigating insurance losses by analyzing financial records and accounting documentation,
  - Investigating fraud and corruption claims.

#### Limitations

• This analysis is based on documentation provided by the Wild Equity Institute and the Recreation and Park Department. This analysis does not represent an audit of the Recreation and Park Department's financial statements in accordance with generally accepted auditing standards. This report is dependent on the accuracy of the information provided by Wild Equity Institute and the Recreation and Park Department.

mar

Hannah Dingley