

WILD Equity

INSTITUTE

*Building a healthy and sustainable global community for people
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.

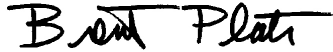
We have reached this conclusion after carefully weighing the SNRAMP's conservation benefits against the environmental harm that will be wrought by A18. It is clear that the proposed conservation benefits SNRAMP may bring to the City's other natural areas are greatly outweighed by the concrete harms that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

A handwritten signature in black ink, appearing to read "Brent Plater". The signature is written in a cursive, flowing style with a horizontal line extending from the end.

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 Garter 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,

A handwritten signature in blue ink, appearing to read "Bill McLaughlin", is written over a horizontal line.

Bill McLaughlin

Surfrider Foundation, San Francisco Chapter

Restore Sharp Park Campaign Lead



San Francisco Bay Chapter

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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.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Arthur Feinstein', is written over the word 'Sincerely,'.

Arthur Feinstein,
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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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,

A handwritten signature in black ink, appearing to read 'Jennifer Clary', written in a cursive style.

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,

A handwritten signature in dark ink, appearing to read 'Amandeep Jawa', is written over a faint, circular official stamp. The stamp contains text that is mostly illegible but appears to include 'San Francisco League of Conservation Voters' and 'President'.

Amandeep Jawa, President
San Francisco League of Conservation Voters



SEQUOIA
AUDUBON SOCIETY

**P.O. Box 620292
Woodside, CA 94062**

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,



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 SNRAMP 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 where 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 Kriger
Executive Director
831-621-6215

2524 San Pablo Avenue
Berkeley, CA 94702 USA
E-mail: kerry@savethefrogs.com

savethefrogs.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 SNRAMP 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 where 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,

A handwritten signature in cursive script that reads "Neal Desai". The ink is dark and the signature is fluid, with the first and last names clearly legible.

Neal Desai
Pacific Region Field Director
National Parks Conservation Association



August 25, 2014

Resolution to oppose any final Significant Natural Resource Areas Management Plan Environmental Impact Report that contains the Sharp Park Golf Course Redevelopment Project (A18).

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, 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, 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 "[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"; and

WHEREAS, 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, with the exception of 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

NOW, THEREFORE BE IT RESOLVED that the San Francisco Green Party supports removing all Sharp Park Golf Course projects and management proposals derived from A18 from the SNRAMP EIR process, and opposes passage of the SNRAMP EIR as currently drafted.



*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 email ggas@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,

A handwritten signature in blue ink that reads "Cindy Margulis". The signature is fluid and cursive, with the first name "Cindy" and last name "Margulis" clearly legible.

Cindy Margulis, Executive Director

CC: San Francisco Mayor Ed Lee
SF Board of Supervisors