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The Sharp Park Golf Course Pumphouse Project Must Go Through a Full Environmental Impact Report Before the Project Is Approved

- The Sharp Park Pumphouse Project proposes to dredge sediment and aquatic vegetation from the Laguna Salada wetland complex so water flows more rapidly to the pumphouse, allowing the pumphouse to drain the wetland complex at a faster rate.
- Experts such as Greg Kamman—the hydrologist retained by SFRPD to analyze Sharp Park's hydrology—have explained that increasing the pumping rate will harm the threatened California red-legged frog and the Laguna Salada wetland complex in at least two ways:
    - Increasing the pumping rate will cause additional harm to the California red-legged frog by draining more of the frog's breeding habitat before the frog can reproduce.
    - Increasing the pumping rate will cause the complex's water level to remain shallow for a longer period of time. Because aquatic vegetation grows rapidly in shallow water, the project's purpose cannot be sustained unless the wetland system is dredged regularly. Dredging releases harmful sulfur-based sediments into the water column, and regular releases of these compounds can disrupt the wetland complex's ecology.
- These experts have proposed a feasible alternative to the pumphouse project: allowing the wetland complex's water levels to rise higher than the aquatic vegetation can tolerate. This would reduce the amount of aquatic vegetation in the wetland complex without harming the frog, and would not require regular dredging.
- But the Pumphouse Project's Mitigated Negative Declaration does not consider the environmental consequences of increasing the pumping rate, nor does it consider alternatives to the project.
- This violates CEQA, because the project's pumping protocols only constrain pumping *after* California red-legged frog egg masses are laid. Preemptive draining of breeding habitat currently occurs, and faster pumping will cause even more breeding areas to be preemptively drained.
- Moreover, the City has never considered the environmental effects of the existing pumping rate—let alone increasing the pumping rate—in any prior CEQA document. Therefore the increase in pumping cannot be considered part of this project's "environmental baseline."
- The Laguna Salada wetland complex and the adjacent Mori Point National Park are one of the most prolific California red-legged frog breeding areas in the state. Yet the California red-legged frog population is declining at Sharp Park because existing pumping protocols cause egg masses to be killed when the wetland system is drained.
- Draining existing or future breeding areas at faster rates will not enhance the California red-legged frog population. To enhance the population pumping rates must be reduced so that eggs can hatch and tadpoles can become adults before the wetlands are drained.
- Unless a full Environmental Impact Report is ordered by the Board of Supervisors, these environmental effects will not be considered, and environmentally superior alternatives will be ignored.

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