Dec. 11, 2011

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

Subject: Beach chalet Athletic Fields Renovation Project DEIR

Attn: Bill Wycko, Environmental Review Officer

Dear Mr. Wycko,

I am a local San Franciscan, born and raised. I have lived near Golden Gate Park much of my life. This does not prove that my position is correct, but it establishes that I know the Park.

Full disclosure: I am opposed to the placement of synthetic turf in Golden Gate Park, even to achieve what I understand to be the driving motivations for the project: increase available revenue-producing play time, and decrease maintenance time and costs.

**PRECEDENT AND HISTORIC CHARACTER:**

I believe the DEIR is written to ultimately support the project, despite the Golden Gate Master Plan which stipulates the natural character of the GGP, especially the portion west of 19th Avenue. I believe the DEIR marginalizes the historic and natural (I understand this is a politically incorrect word these days) character of Golden Gate Park.

I'll explain why. The DEIR does not address what will obviously happen should this project be approved by the RP Commission, based initially upon a supportive EIR by Planning. This project can be seen from a revenue/cost perspective, and ignore the historic character of the Park, or it can be seen as the "camel's nose under the tent", a precedent setting project. In the desert they say do not let the camel get his nose under the tent, or he will soon be eating your lunch. That's this project.

Should the EIR ultimately declare that the project, if approved with synthetic turf, will not have a significant environmental impact, the project will set a precedent for further revenue generating projects to install synthetic turf in the Polo Fields, Big Rec and Kezar, and maybe in the nearby golf course. More play time, more revenue, less maintenance, less grass.

Changing the historic character of GGP is not justified by the goal of reducing gardener and custodial maintenance costs, or increasing revenue from more play time. The debate here is not between no play time and huge play time. It's not necessarily about natural grass turf play time vs. artificial turf play time. It's about revenue and costs.

It's about whether a partnership between RPD and the Fields Foundation which is promoting synthetic turf shall override the Master Plan and the historic character of the Park,

The flip side is it is about RPD shedding responsibility for maintaining parklands with gardeners and custodians on a regular basis, with regular maintenance costs.
I did not see this debate dealt with in any detail in the DEIR, because the project goals are accepted on face value, vis., more play time (revenue), less maintenance (cost). But is this what the residents of San Francisco want in Golden Gate Park?

What will the Planning Department write when projects for turf replacement are submitted for the Polo Fields, for Kezar, for Big Rec, the nearby golf course? The DEIR ignored these obvious next targets for synthetic turf. I believe the proposed project, in combination with present, proposed, and reasonably foreseeable future projects, will indeed have a huge, cumulative and irreversible impact on the character of Golden Gate Park. I disagree with the DEIR conclusions that it "would not result in cumulatively considerable impacts related to historic resources."

The excuse currently is that these kinds of changes are necessary to address budget shortfalls. This is merely a political dodge by administrators to avoid demanding that our federal dollars be sent back to us to support our community.

I believe it is time to stop accepting historic changes on the alter of budget deficits. And it is time to be critical of the precedent such public-private (corporate) partnerships establish. In my view, this needed to be addressed in the DEIR.

The Planning Department is in the position of enabling this project, or of being more critical. I urge you to be much more critical.

(I do love replacing the 8 foot fence with a 4 foot fence. Much more open and user friendly.)

I urge Planning to declare the project has irreversible environmental consequences and look to an alternative with natural turf, state-of-the-art drainage system, good gopher barrier, and regular maintenance crew.

Postscript:

I listened to the December 1, 2011 Planning Commission meeting on the DEIR. I was astonished to hear Commission Miguel, I believe it was, give a long statement about how the Golden Gate Master Plan was unreliable as a document to support the naturalistic character of Golden Gate Park. Then he told everybody that he sat on the body that crafted the 1998 Master Plan, and he claimed that it said something contradictory every few pages. Either he and the others who drafted it were incompetent, or he chose to create those remarks to undermine the public's reliance on the Master Plan and to put his position on the record.

Shameful tactic.

Thank you for your consideration of my comments,

Sincerely,

Denis Mosgoian
1227 – 10th Avenue
San Francisco, CA 94122
415-566-5235
Comments on the Draft Environmental Impact Statement Report (DEIR) for the Beach Chalet Athletic Fields Renovation, Planning Department Case No 2010.0016E, October 2011

By Rasa Gustaitis, 359 Jersey, San Francisco, CA 94114. Tel: 415-285-4109

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

The proposed project is within the Coastal Zone. It is required to comply with provisions of the City’s certified Local Coastal Program (LCP), which includes the provisions of the City’s Golden Gate Park master plan for the western end of the park.

Among the objectives and policies of the LCP are requirements that

“the visual and physical connection between Golden Gate Park and the beach be strengthened and emphasize the naturalistic landscape qualities of the west end of the park for visitor use.” Golden Gate Park, Objective 3, Policy I

The proposed soccer fields, in which grass would be replaced by artificial turf that is lit by 60-foot stadium lights, would egregiously violate this requirement on all counts.

In Comments on the Notice of Preparation submitted March 3, 2011 by California Coastal Commission staff, Program Analyst Renee T. Ananda noted that the LCP is the legal standard of review for the Coastal Development Permit (CDP), which the City is responsible for processing. She pointed out the above-mentioned objective and policy. She recommended that the DEIR analyze project impacts on coastal resources and its conformity with the policies of the LCP, including “potential impacts of artificial lighting on biotic resources and the public’s coastal recreational experience in the surrounding area and along Ocean Beach.”

The DEIR contains no such an analysis, nor does it address conformity with the LCP. Although the City, not the California Coastal Commission, has held responsibility for approving CDPs since the LCP was certified, the City is required to act in keeping with the California Coastal Act and the LCP.

Overall, this DEIR is inadequate, misleading, and unacceptable. It falls far short on addressing the issues at stake. Among its most egregious failings are:

1. Drawing unsupported broad conclusions without support in facts or analysis
2. Dismissing as “insignificant” many impacts without explanation
3. failing to analyze alternatives to the artificial turf, brightly lit one the Recreation and Park Department seeks to build.
4. failure to consider cumulative impacts on the park of this and recent, as well as potential new proposals.

On the matter of impacts of artificial turf alone, the DEIR fails to take into account studies that show serious health hazards, environmental impacts, long term costs compared to the cost of investing in improvement and maintenance of the existing grass fields, and the fact that the turf has to be replaced every 10 years or so but as of now no manufacturer is recycling its products.

"There appeared to be only one company that indicated they had an active recycling component/program associated with their turf projects."

In addition, the report points out that this is "a volatile market," companies come and go rapidly in the artificial turf industry. So even if a promise is made that the material will be recycled, it may well be that the company that sells it to the City will be out of business when the time to recycle arrives.

Please reject this report and demand one that addresses the real issues that must be considered in a proposal to destroy a treasured natural and quiet part of Golden Gate Park for the sake of a building a single-use athletic complex. Our children, as well as adults, need contact with wildness, and as building projects continue to advance in this park, less and less of nature remains.

Thank you for your attention to these comments.

Rasa Moss
December 12, 2011
Mr. Wycko,
Attached please find my comments on the Draft EIR for the Golden Gate Park Soccer Fields. Thank you for the opportunity to comment on this matter. If I can be of further help on this matter please fell free to contact me through e-mail or at (415) 564-0064.

Dan Murphy (See attached file: GGP soc fld let 12.11.doc)
Attachments:
GGP soc fld let 12.11.doc
Submitted via e-mail

Bill Wycko, Environmental Review Officer
Beach Chalet Fields Renovation
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103
<bill.wycko@sfgov.org>

Re: Draft Environmental Impact Report for the Beach Chalet Athletic Fields Renovation Project (Planning Dept File No. 2010.0016E)

Dear Mr. Wycko:

I am deeply troubled by the Beach Chalet Athletic Fields Renovation Environmental Impact Report (EIR). There are many problems with the report, but I will limit my comments to a few, mostly dealing with night lighting, fencing and impacts on birds.

To begin with, there are some striking problems with information provided about birds and their use of the project site. Essentially this element of the EIR is wrong.

Having studied birds in western Golden Gate Park since the early 1970’s, I can state unequivocally that the treatment of birds at the project site is understated. Studies undertaken during the winter and nesting seasons of 1981 and 1982 at North Lake and the woodlot immediately to the west indicate similar plots to the project site are in fact very rich nesting habitats for birds. Combined with the San Francisco Breeding Bird Atlas, these studies completely refute conclusions based on an incomplete breeding bird survey that apparently was conducted toward the end of the peak of the season.

The following references can be viewed on the Searchable Ornithological Research Archive (SORA) http://elibrary.unm.edu/sora/index.php

Murphy, Daniel P., 165 Urban Park – Lake, Marsh and Mixed Forest.
Murphy, Daniel P. 166 Urban Park - Mixed Coniferous Forest.
NOTE:
In the mixed coniferous forest study plot, which was most similar to the woodlands surrounding the proposed project site, 14 nesting species were found. 64 territorial males or females were observed.
In the lake, marsh and mixed forest study plot which was somewhat richer than the proposed project site 20 nesting species were found. 103 territorial males or females were observed.

Murphy, Daniel P., 153 Urban Park – Lake, Marsh and Mixed Forest
Murphy, Daniel P., 154 Urban Park - Mixed Coniferous Forest.
NOTE:
In the mixed coniferous forest study plot, which was most similar to the woodlands surrounding the proposed project site, 14 nesting species were found. 47 territorial males or females were observed.

In the lake, marsh and mixed forest study plot which was somewhat richer than the proposed project site 12 nesting species were found. 60 territorial males or females were observed

Murphy, Daniel P., 80 Urban Park – Lake, Marsh and Mixed Forest
Murphy, Daniel P., 79 Urban Park – Mature Mixed Coniferous Forest
NOTE:
In the mature mixed coniferous forest which most resembles the project site there was a total of 34 species with an average of 72 birds per visit.

In the lake, marsh and mixed forest plot there was a total of 50 species with an average total of 313 birds.

Murphy, Daniel P., 64 Urban Park – Lake, Marsh and Mixed Forest
Murphy, Daniel P., 65 Urban Park – Mature Mixed Coniferous Forest
NOTE
In the mature mixed coniferous forest which most resembles the project site there was a total of 33 species with an average of 126 birds per visit.

In the lake, marsh and mixed forest plot there was a total of 58 species with an average total of 290 birds.

Not only is the project site a part of the greater habitat of Golden Gate Park and similar in many regards to the study plots mentioned above, the project site also shares a significant abundance of birds during fall migration. There are no studies documenting migration for western Golden Gate Park, but it is certain that it is a significant site for migratory land birds between mid August and mid November. That is a fact that cannot be dismissed in the way the authors of the EIR dismissed avian use of the woodlands near the soccer field.
There are a number of facts about bird migration that should be mentioned in the EIR:

1. Fall migration peaks between mid-August and mid-November in San Francisco.
2. Spring migration takes place between early February and the end of May.
3. Migrating birds in both spring and fall tend to fly at night.
4. Birds migrate along the coast in much greater numbers in fall than spring.
5. In addition to birds considered regular migrants along the Pacific Flyway, there are significant numbers of others that are out of range. San Francisco County has a list of about 400 species. Of those some are listed as endangered, rare, threatened or species of concern. Research could easily come up with specific species, but among those that are likely to use the project site one must start with Tri-colored Blackbird, San Francisco Common Yellowthroat, Yellow Warbler, Willow Flycatcher and the list goes on.
6. Night migrating birds are most active in the hours immediately following sunset and the hours prior to sunrise.
7. Studies indicate migrating birds are attracted to bright lights when they are taking flight and deciding where to land.
8. Migrating birds are attracted to bright lights and the attraction is intensified during foggy conditions.
9. The project site is often fog shrouded during August, September and early October.

Conclusion:
Bird use of the woodlands, and for that matter the field itself, is far more significant than what is suggested in the EIR. The fact that bird use of the area is all but dismissed in the EIR is incorrect. Birds depend on this area in considerable numbers. This should be corrected in the EIR and the EIR should be reissued for comment based on accurate data about birds.

WESTERN SNOWY PLOVER
The EIR dismisses impacts from lighting on Western Snowy Plover. That’s pretty difficult to state. The plovers do in fact inhabit the beach for about 10 months of the year. During some of that time they roost on the beach north of Lincoln Way. It is unknown what impact night lighting might have on that population. We do know the birds move around a lot. Based on observation of banded birds, it is typical for the beach to host 30 or so banded birds through the course of the year. At any one time there are usually 5 to 8 banded birds. That means the others are moving elsewhere, probably at night. Whether the lights from the soccer fields might attract them or not is simply not known. The EIR should have a specific action to mitigate any impact on the Western Snowy Plovers. That action should be to immediately turn off the lights and remove the light standards. Unfortunately, there is not much flexibility that can be considered here. With only a few thousand Western Snowy Plovers remaining, we really must do what we can to assure their survival.

NIGHT LIGHTING
The proposed light standards pose a threat to migrating birds that would be difficult to mitigate. The most significant problem the EIR should address is how impacts will be mitigated with foggy conditions during fall migration. The best course of action would
be to simply drop night lighting from the project all together. It is inappropriate on many levels, but I’m sure that will be brought up by others. Therefore these comments will only deal with potential problems with the lights, their standards and the black cyclone fencing.

Lighting on clear nights poses a problem but one that might be mitigated with the use of alternate lighting systems. The issue is that migrating land birds will see the lighting, be attracted to it and in the course of their flight strike structures in the area. With the use of 10 approximately 60-foot towers, 47 approximately 15-foot standards and 13 approximately 18-foot standards, not only is night lighting a critical issue, but it is compounded by an obstacle course of light standards. Further, the black fencing, though only 42 inches high poses a real threat to birds like swallows and swifts that soar through the air in search of flying insects. They often fly close to the ground and could be victims of collisions with the obscured black fencing. This project has the real potential to be a death trap for migrating land birds. Then there are seabirds, shorebirds and others for which I do not have data, but that the EIR should consider.

The problem of night lighting is compounded during foggy conditions. With the lights on until 10 each and every night of the year, they will shine in the fog. The glare of night lighting in fog attracts birds whose vision is altered by the poor conditions. They fly to the glare and are known to fly in circles until they exhaust themselves or strike and object. With 80 structures in the project site, it would see the chances of disoriented birds striking light standards is pretty high. The problems with fencing stated above would only be compounded by fog.

Conclusion
The EIR must define just what will be done to control impacts on migratory birds. The minimum is that the Recreation and Park Department should permanently employ an independent biological agency like PRBO Natural Sciences or the San Francisco Bay Bird Observatory to conduct frequent surveys to assess bird strikes at the soccer fields. Appropriate mitigation measures must be ready to put in place on an immediate basis. In other words, if strikes are noted night use of the fields should cease immediately until mitigation measures are put in place. Should bird strikes continue all lighting should be shut off and the towers should be removed immediately.

The use of black fencing should be reconsidered. Fencing that is visible to birds in the proposed lighting conditions should be identified and used.

NESTING IMPACTS
It is likely there will be impacts on nesting birds. Given the data presented in the EIR completely misstates the use of the area by nesting birds, the impact on nesting birds should be reassessed. It is likely there will be considerable impacts on birds from the use of night lighting.

ARTIFICIAL TURF
There will be a loss of several acres of open grass as a food resource for birds throughout the year. The major impacts will be on feeding American Robins, Killdeer, White-crowned Sparrow, Golden-crowned Sparrow, Brewer’s Blackbird, and Red-winged Blackbird. There are other species that would be impacted as well. Secondary impacts would be to resident raptors, particularly Red-tailed Hawk, Red-shouldered Hawk and Cooper’s Hawk, and to Great Horned Owls and perhaps Barn Owls. All those species would utilize the open grass soccer field for feeding and that resource would no longer be available. Given conditions in San Francisco, it is apparent that the impacted birds would not just move over to the next field, because that field is already occupied by other birds. They would lose their habitat and eventually their lives.

TREES
The loss of trees necessary for this project will impact birds. The most likely would be nesting species that use the area. We can assume there are significant numbers of cavity nesting birds that would be most impacted. They include Pygmy Nuthatch, Brown Creeper, Chestnut-backed Chickadee, Downy Woodpecker and Tree Swallow. What are the mitigation measures to off-set this habitat loss? It is also likely at least one or two pairs of raptors, a pair of Common Ravens, a pair of Black Phoebes, a pair of Olive-sided Flycatchers, a few Brewer’s Blackbirds and several House Finches to mention some likely candidates. What mitigation measures will be taken to off-set this habitat loss?

GENERAL CONCLUSION
From the elements of the EIR I had time to read, this project should be rejected on the grounds it is likely to cause irreparable harm to wildlife. There are many other reasons to reject the lighting element of the project and the artificial turf element as well, but I will not comment on them since this is a focused comment. I would encourage the Recreation and Park Department to improve the soccer fields by employing the use of gopher netting beneath a new natural turf field. I would hope night lighting would be rejected under any circumstances. I would also suggest extending the soccer fields south into the site of the former sewage treatment plant. By doing so they could add an additional soccer field and perhaps 2.

Thank you for the opportunity to comment on this matter.

Very truly yours,

Dan Murphy
Please include as DEIR comment. Thanks.

Thanks,
Don Lewis
Environmental Planner
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA  94103
ph: (415) 575-9095  fax: (415) 558-6409
Re: Draft Environmental Impact Report for the Beach Chalet Athletic Fields Renovation Project (Planning Dept File No. 2010.0016E)

Mr. Wycko,

I just read the article below on Yahoo News. It reports on the impact on a flock of migrating grebes that crashed into lighted parking lots during a storm. Though not identical to what we might expect to occur in Golden Gate Park, it is an example that reviewers should be aware of when evaluated whether night lighting is appropriate in an otherwise dark parkland.

Please add a copy of this e-mail to the comments I submitted yesterday.

Thank you for your attention to this matter.

Very truly yours,
Dan Murphy

Thousands of birds make crash landing in Utah
APAP – 9 mins ago

ST. GEORGE, Utah (AP) — Thousands of birds died on impact after apparently mistaking a Wal-Mart parking lot and other areas of southern Utah for bodies of water and plummeting to the ground in what one wildlife expert called the worst downing she's ever seen.

Crews went to work cleaning up the dead birds and rescuing the survivors after the creatures crash-landed in the St. George area Monday night.

By Tuesday evening, volunteers had rescued more than 2,000 birds, releasing them into nearby bodies of water.

"They're just everywhere," Teresa Griffin, wildlife program manager for the Utah Department of Wildlife Resource's southern region, told The Spectrum newspaper in St. George (http://bit.ly/rYpQbJ). "It's been nonstop. All our employees are driving around picking them up, and we've got so many people coming to our office and dropping them off."

Officials say stormy conditions probably confused the flock of grebes, a duck-like aquatic bird likely making its way to Mexico for the winter. The birds tried to land in a Cedar City Wal-Mart parking lot and elsewhere.

"The storm clouds over the top of the city lights made it look like a nice, flat body of water. All the conditions were right," Griffin said. "So the birds landed to rest, but ended up slamming into the pavement."

No human injuries or property damage have been reported.

Griffin noted most of the downings she's seen have been localized, "but this was very widespread."

"I've been here 15 years and this was the worst downing I've seen," she told the newspaper.

Officials said they were continuing a rescue effort that started Tuesday afternoon and included an enthusiastic group of volunteers. The surviving grebes were released into bodies of water in southern Utah's Washington County, including a pond near Hurricane.
"If we can put them on a body of water that's not frozen over, they'll have a better chance of survival," said Lynn Chamberlain, a wildlife department spokesman.

The Planning Department will have reduced services available the last week of December 2011. In addition to the regular observed legal holiday on Monday, December 26, 2011, most Planning Department offices will be closed on December 27, 28, 29, & 30. On these dates, only the Planning Information Center (PIC), located on the 1st floor of 1660 Mission Street, will be open normal business hours as follows:
- Tuesday, December 27, 2011: 8:00 AM to 5:00 PM
- Wednesday, December 28, 2011: 8:00 AM to 5:00 PM
- Thursday, December 29, 2011: 8:00 AM to 5:00 PM
- Friday, December 30, 2011: 8:00 AM to 5:00 PM
Please note that the PIC will have reduced staffing on these days. The PIC phone number is (415) 558–6377. The Planning Department will resume full services on January 3, 2012.
From: Bill Wycko/CTYPLN/SFGOV
To: Don Lewis/CTYPLN/SFGOV@SFGOV, Sarah B Jones/CTYPLN/SFGOV@SFGOV

Date: Monday, December 12, 2011 04:52PM
Subject: Fw: Draft EIR for the Beach Chalet Athletic Fields

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 12/12/2011 04:53 PM -----

Jerome Napoli
<iggyandj@gmail.com>

Toeric.l.mar@sfgov.org,
bill.wycko@sfgov.org
ccmayoredwinlee@sfgov.org,
sfoceanedge@earthlink.net
Subject: Draft EIR for the Beach Chalet Athletic Fields

12/12/2011 02:13 PM

Dear Mr. Mar and Mr. Wycko:

We just recently heard about the proposed modifications to the Beach Chalet Athletic Fields. We wish to lodge our strong recommendation that the project NOT include the artificial turf and stadium lighting currently proposed. We want Golden Gate Park to remain as natural as possible, with limited removal of natural vegetation. There appears to be enough health and safety issues surrounding the use of artificial turf that adding nearly seven (7) acres to a natural habitat is exposing the children and animals who will use the fields to this unnecessary risk. The costs of renovating the fields with natural grass and gopher abatement will be substantially less than that introducing artificial surfaces and lighting. At a time when all city and county agencies are under severe budgetary constraints, spending ten to twelve million dollars on the proposed project is profligate! Other cheaper, natural alternatives exist and MUST be considered. DON'T LET THIS PROJECT GO FORWARD as currently proposed!

Jerome F. Napoli
Diana J. Misthos

Residents @ 8133 Geary Boulevard
Dear Mr. Wycko:

Please find attached letter regarding The DEIR for the proposed Beach Chalet Athletic Field renovation.

Alan M. Ogilvie  
879 47th Avenue  
San Francisco, CA 94121  
Tel: 650-481-5397  
Skype: alan.michael.ogilvie  
Web: www.electro-water.com (See attached file: Beach Chalet rebuttal to DEIR letter.doc)  
Attachments:  
Beach Chalet rebuttal to DEIR letter.doc
Alan Ogilvie  
810 43rd Avenue  
San Francisco, CA 94121  

Attention: Bill Wycko:  

December 12 2011  

Beach Chalet Athletic Fields Renovation 2009 Proposal  

I appreciate that a draft environmental impact report was created by the San Francisco planning department in order to evaluate this extremely important issue. This report has led to further concerns that I and many of my neighbors have about this project.  

It is requested that the Planning Department not approve this proposed project, as it would create significant negative impacts to the character of the west end of Golden Gate Park, degrade the park use experience of the 200,000 residents of the Sunset and Richmond district and other residents and tourists that enjoy the quiet naturalistic setting of the west end of the park, and will have significant adverse effects on the environment and our resident and migratory wildlife.  

Specifically, it is requested that the Planning Department not approve the following components of this proposed project:  

Installation of artificial turf  
Installation of stadium lighting (150,000 kw of night lighting)  
Field size enlargement  
Barbeque area  
Children’s play area  
Concrete perimeter around fields  
Lighting fixtures around field and pathways  
Raised fencing height  
Spectator seating that is excessive to needs of city resident games  
10) Restroom renovation beyond sinks, toilets and baby changing areas  

Clearly these soccer fields, and others in the City, require renovations and improvements to meet the needs of the growing soccer community in San Francisco, and in particular the need to have soccer fields available for children.  

There is overwhelming evidence that sports in general are beneficial to children in terms of health, fitness, sportsmanship, leadership, and self-esteem.  

As an ex soccer player and youth coach, I can attest to these many benefits. In my opinion soccer is the best sport overall for developing children, as it has broad appeal, is not gender specific, and is the world’s most popular and exciting sport, whether it be if a player or as a spectator.
The question is whether soccer is best played on artificial turf, or grass?

Soccer is typically a winter sport. While artificial turf may be appropriate for many areas of the US where winter conditions make playing on grass fields difficult or impossible, San Francisco's benign climate lends itself perfectly to use a natural grass surface.

The other issues are as follows:

**MRSA - Mersa or Staph**

**The biggest concern.**

MRSA infections are on the increase. The most rapidly growing staph infection is Community Acquired MRSA or CAMRSA.

- The Center for Disease Control or CDC estimates that MRSA kills more people per year in the US than AIDS.

- The CDC latest figures, from 2001 state that in American hospitals alone, Healthcare-Associated Infections (HAI's) account for an estimated 1.7 million infections and 99,000 associated deaths each year. These figures are 9 years old, and it can be safely assumed that the more recent figures would be alarmingly higher.

  http://www.cdc.gov/ncidod/dhqp/hai.html

Not withstanding the extremely high fatality rate, the costs associated with overcoming the infections in a clinical setting are staggering.


In the course of my profession I was required to monitor the world wide issue of HAI's, and in particular MRSA. I maintained a website blog which over the course of two years there were over 4000 entries following and reporting on the worldwide spread of the potentially deadly bacteria.

Due to the prolific use of antibiotics in the past thirty years or so, this has become a worldwide problem as bacteria have become more and more resistant to antibiotics.

With regards to CA MRSA, this particular infection has been known to occur in many schools, colleges and universitites, in particular affecting students, male or female, who are involved in sports.
Contact sports such as Football, Soccer, Wrestling, Lacrosse, and Gaelic Football all involve skin to skin contact, and present the potential for transmission of the bacteria from one person to another.

The infection can be harbored on equipment, on hard surfaces, clothing, Jacuzzis, towels, razors, footwear, door handles, gymnasium floors and mats, toilet seats, and artificial turf.

Outbreaks of CAMRSA have also been known to occur in prisons or areas where there can potentially be skin to skin contact. The Military have also seen concerning infection numbers.

- A study by the CDC found that athletes who sustained a skin burn from artificial turf were seven times more likely to develop a MRSA infection. Another study published in the Journal of Clinical Microbiology in 2000 found that MRSA survives better on artificial turf than on other surfaces.

- CA MRSA and MRSA are known to be particularly relevant in attacking people with compromised or undeveloped immune systems. Young children and the elderly are at particular risk of serious consequences from acquiring this infection.

- According to a 2007 report by the NFL Players Association, 61 percent of 1,511 players polled had negative reviews of artificial surfaces, with many believing artificial surfaces were more likely to cause injury and shorten players' careers.

  http://www.foxnews.com/story/0,2933,329065,00.html

Please also this article which appeared in Time magazine about the issue

http://www.time.com/time/arts/article/0,8599,1853828,00.html

While the subject of MRSA has been addressed to some degree in the proposal, it seems to me that the potential dangers presented by the use of artificial turf have been minimized and require further research.

- A number of American hospitals have been sued in the past by families of patients who have contracted the bacteria and as a result have either died or have necessitated numerous life saving surgeries due to the extent of the infection.

These suits have been filed stating unsanitary practices or poor medical treatment. In many cases MRSA was not immediately diagnosed, leading to severe consequences.

- As of 2007, California Lawmakers implemented legislation requiring all California hospitals to report all HAI's including CA MRSA. These records should allow insight into infections resulting from artificial turf injuries.
The potential legal ramifications to the city of San Francisco as a result of a serious infection resulting in the death of a player cannot be understated.

To minimize or dismiss this potential serious issue would be a major oversight, and is worthy of further research.

I refer to these links below which will help explain the issue even further

http://sportsinjuries.suite101.com/article.cfm/artificial_field_turf_vs_natural_grass_safety


http://fotp.org/advocacy/artificial-turf

**Injuries**

The proposal from Rec and Park states that one of the key factors they considered in promoting the use of artificial turf over grass was due to injuries sustained by the poor condition of the grass fields due to gopher holes.

- They quote one example of a player breaking an ankle. This begs the question is there statistics available staging the number of injuries incurred due to the poor condition of the field?

- They point to Garfield Square Playground stating that it was formerly known as "The Park where you break your foot". Are there any statistics available on the number of players that have actually broken their foot, or is this purely anecdotal?

Soccer is a contact sport, and it is inevitable that injuries will result from playing it. Most adult players have been injured in one way or another during the course of their careers.

This applies to amateur as well as professional players.

Other sports such as Lacrosse or Gaelic football are also contact sports which will also result in injuries.

While there is no specific evidence to suggest that there is more likelihood of injury by playing on artificial turf, the main cause for concern is rashes or burns acquired by the player having contact with the ground. This raises the MRSA issue.

- It is vital in the case of a potential infection or injury to ensure that the affected area is cleaned and protected as soon as possible.
• Within the proposal, with regards to the bathroom renovation, there has been no provision made for shower stalls. If a player has access to a shower immediately following injury this could severely reduce the chance for infection to set in.

• Currently players, after they leave the field, are reduced to either changing in the toilet or more commonly in the car before they head home to hopefully take a shower. Should there be a delay in showering, this again could result in infection taking hold.

• There is also the question of chemical infection occurring in a wound due to the composition of the turf, which in some cases is known to contain lead, chrome, zinc and possibly others.

   http://www.cdc.gov/nceh/lead/tips/artificialturf.html

Another area where grass is better than artificial turf is in the length of the cleats required to play. Longer cleats used with grass reduce the possibility of a player slipping or twisting due to better stability.

Provisions should be made to improve the bathroom facilities to include showers for both male and female players regardless of which surface they should play on.

Gophers

Gophers live underground in every park or grassy area. In the case of Golden Gate Park, gophers are everywhere.

Any of the gardeners in the Park will state that this is one of their biggest challenges, as they are difficult to exclude from doing significant damage. While this is true of an area such as a golf course, in the case of the Beach Chalet soccer fields, is relatively easier and inexpensive to address.

• As the soccer fields are contained by a fence, by digging a trench 2 to 3 feet deep by 1 foot wide around the outer perimeter of the fence. Narrow gauge wire fencing is then put in to the trench, backfilled, thus providing an underground barrier that the gophers cannot pass through.

• Should the gophers attempt to enter through the fence; a barrier of small gauge wire can be added to the existing fence to provide yet another barrier.

Other Areas of concern

The following components are desired to be improved as listed
Renovating restrooms to replace the toilet stall doors that have been missing for years, adding new mirrors, soap dispensers, modern toilet paper dispensers, hand dryers, sinks and baby changing tables in mens and womens bathrooms.

Adding lockers pose some risk of vandalism, but would not be opposed. Showers will attract homeless park dwellers and require excessive maintenance. Players can bring towels to wipe down, have room to change clothes, and will need to shower when they get home. Given the problems we have in Golden Gate Park, this is a concession players have to live with to play here.

In the UK, soccer is the national game, and hundreds of thousands of players play the game on a regular basis almost all the year around. In every organized soccer game the facilities are available to the players include showers, and in certain cases plunge baths.

In my opinion the bathroom facility would have to be expanded considerably to be able to effectively accommodate the players. This then raises a question of security for valuables, and protection against vandalism which could easily happen.

Building small areas of spectator seating that is in keeping with the naturalistic setting of the west end of Golden Gate Park. **There is no room to implement this additional fixture.**

**Improvements to and expansion of the parking lot by 8 spaces, as proposed.**

The proposal to increase the number of spaces in the soccer field parking lot by 8 spaces will not reduce the traffic congestion on weekends for the current primarily resident use of these fields. Intentionally attracting Bay Area Leagues to play on these fields will increase the number of spectators by many fold.

RPD states that Ocean Beach parking lots will accommodate the need for additional parking. Ocean Beach parking lots are full on sunny weekends year round. In order to accommodate the additional need for parking that will be generated by this proposal to expand field size to professional league competition size spectators would require RPD providing a minimum of 100 additional spaces, if only 25 spectators attended games on the four fields. In actuality, there could easily be 100 spectators that attend games on each of the 4 fields.

The logistics of a soccer tournament are as follows:
11 per side plus 3 substitutes = 14 = 28 players per game. Plus 2 coaches per team plus referees and 2 linesmen = 33 total participants every 1 ½ hours (per game).

Spectators can be expected to be at least 30 per game, and more likely 60 spectators which gives us 93 players x 4 fields = 400 people attending each 90 minutes.

If 5 games are hosted per field on a weekend day, this = 2000 people that will all need to park their cars.
It is difficult enough to park now, and bringing in this volume of people will make it an absolute nightmare. This clearly has not been thought through intelligently.

Changes Character of the West End of Golden Gate Park

Lengthening the fields will necessitate removing the windscreen hedge between the service road and the fields – contrary to the computer model images that City Fields has presented. (Just as City Fields admitted that the computer generated images they provided to represent the amount of light that will be generated by the stadium lights, and how much light would be seen from Sutro Park, was greatly under-represented.

The fields do not need to be expanded, they are perfectly fine as they stand right now and would meet any soccer leagues requirements.

Enlarging (lengthening) the fields is unnecessary and will take away the small walkway of grass around the fields that were fenced off from the public to walk on in the mid 90’s. I walk around these fields on the grass daily. Putting concrete walkways around the artificial turf fields will make this is unattractive for walking for pleasure. The green meadow of these fields is an ideal place to take a quiet walk.

Stadium lighting.

The lights will be seen for miles. This is in conflict with the city’s commitment to reduce nighttime light pollution to protect wildlife. (See environmental impact section) Not to mention our adoption of the Green City Initiative to reduce excess power usage.

Noise

Soccer fans get excited and make noise. It's the same the world over at any level. The noise levels will increase dramatically and spoil the peaceful experience of being in Golden gate Park.

Garbage

The amount of garbage generated by soccer tournaments is bad now. Increases exponentially and the garbage is increased exponentially. The overworked gardeners will now become full-time garbage collectors and the park will suffer greatly as a result.

Safety

Soccer can be a dangerous game for both players and spectators. Rivalries are commonplace, and things can get out of hand very easily result in people getting hurt. This includes nonparticipant passers by and residents
Artificial turf in no way has the character of natural grass. It will change the look of the area and the feel of the area from one of a peaceful meadow when not in play, to one of industrial sports complex.

Traffic

RPD cannot expect us to believe the results of the traffic study they paid for. Current soccer field use on weekends causes excessive traffic congestion on JFK and MLK, between Bernice Way and the Great Highway.

Weekend demand currently creates traffic hazard to pedestrians, bicyclists, skaters and motorists: Traffic backs up on JFK & MLK as cars stop to wait for a parallel parking space to be vacated. Traffic stops while a car waits for a family to load all of their gear into their car and get themselves all aboard, then pull out, which involves waiting for cars passing the stopped car to create a break in the traffic. JFK & MLK are not wide enough to allow cars to safely pass a stopped car. This requires entering into the oncoming lane of traffic, along with skaters and bicyclists that are also passing the car that has stopped to obtain a “soon” to be vacated parking space. Between the time someone walks toward a vehicle to vacate a parking space and the time they actually pull out and into weekend traffic on JFK & MLK, upwards of 5 minutes may elapse. During this time, other cars, bicyclists and skaters are all trying to get around the car waiting for the parking space. Multiply this scenario several times, as several cars stop to gain parking in the distance between Bernice Way and the Great Highway on both JFK & MLK.

I respectfully request that this issue be reevaluated completely with new plans to include a grass surface, no lighting, improved bathroom facilities, improved parking.

This is Golden Gate Park, a world-famous park, one of the world's great parks and it deserves our very careful stewardship. If Mr. McLaren were alive today he would be mortified at some of these suggestions that have been made.

Sincerely

Alan Ogilvie
879 47th Avenue
San Francisco, CA 94121
Attention: C. Olange Planning Permission President,
Linda Avery, Secretary

I have recently received the Draft Environmental Impact Report on Beach Chalet Athletic Fields Renovation. This is an extremely lengthy and detailed report and requires serious and considerable attention.

In view of the length of the document, the need for many technical questions to be raised, and the fact that we are now approaching the Holiday Season I respectfully request that an extension of time be given in order for the report be examined in detail, and sufficient time be allowed for me to raise questions and seek technical advice on this very important matter.
Thank you for your consideration.
Sincerely

Alan M. Ogilvie  
1833 Vera Avenue  
Redwood City, CA 94061  
United States of America  

Tel: 650-481-5397
The Beach Chalet Soccer Field Draft EIR either directly supports, or by key omissions, confirms that the proposed remake must NOT become a reality.

This is not a “renovation” of an existing field but an attempt to remake it into something it was never intended to be – a mega athletic complex:

“Recreation” at a High Cost:
1. The remake of this existing field is not about creating more playing time for kids – it’s about following the money which leads directly to RPD taking advantage of another opportunity to get tax payers to pay again to “renovate” a beloved play space into something that RPD can market to larger leagues to whom they can charge top dollar for the use which ultimately displaces use by smaller local low-stress play groups.
2. Kids don’t need mega athletic complexes that are in operation way into the night to have quality experiences, and leagues don’t need another excuse to make children’s sports more about winning and less about being a kid. RPD needs to take care of what they have and remember that they are supposed to be all about “recreation” and not about making money off tax-paid public property.
3. West Sunset is the proper alternative and an appropriate place for a larger field complex because there are already all the other facilities there that make for family-friendly access to other resources in one location. It will also not compromise the naturalistic environment in western Golden Gate Park.

Bad Aesthetics:
1. Massive light standards towering over the entire region is disgusting and will be equivalent to a deer staring into headlights. This night light pollution is an absolute deal-breaker whose destruction to the tranquility of the area needs no further discussion. This domineering beacon of light will be visible for hundreds of miles out to sea and will dominate a bird’s-eye-view for visitors flying into the Bay Area. The reflection off thick foggy sky will reverberate and be inescapable for many surrounding blocks of homes.
2. The hum of noise from this complex will drown-out the whistle of wind through trees, cooing of bedding birds, and definitely mask the crashing of waves. Makes me cry!
3. A huge complex of any kind, and particularly in conjunction with another proposed project (water treatment plant) not only takes away from other low-impact opportunities such as trails, natural gardens, and passive recreation The effect is to reduce the western end of Golden Gate Park to a high-impact urbanized setting so over-scaled that one’s eye cannot see around it or over it and leads the mind to believe that it is just another paved part of any place anywhere in any city – not the wondrous Golden Gate Park. This is completely contrary of the spirit and intent of the Master Plan. What a shame!

Fake is Messy, Hazardous, and Labor Intensive:
1. After years of watching the effects of crumbling synthetic materials in children’s playgrounds,
the stuff crumbles and *migrates everywhere* — onto adjacent grassy spaces, sandboxes, sidewalks, into clubhouses, into adjacent private backyards.

2. Huge holes rub into the stuff from repeated treading which is the *true tripping hazard*.

3. Fake is harder to maintain because of replacement values: Real grass requires spot replanting, fake means removing huge sheets of the stuff and reworking supporting material underneath. This *labor intensive process* required specialized and expensive workers instead of regular gardeners.

*Chasing away the Other Residents — Wildlife — Soliciting unwanted Replacements:*

1. The quality of human experience in nature will not be the only living creatures adversely affected by this monstrosity. Birds will have an extension of their *feeding grounds removed* — worms in soil and grass, and be distracted from a natural inclination to roost on tree branches that are either now removed or so flooded with light and inundated with noise and car exhaust as to seek other, cleaner, safer, quieter foliage elsewhere.

2. Opportunistic birds will linger seeking crumbs tossed out by humans that cannot now biodegrade into the soil. Defecation from unsuited birds also will not biodegrade resulting in smelly litter onto every surface and requiring *hours of power washing with thousands of gallons of water.*

*Bad Air, Bad Water, Bad Blood:*

1. Water run-off from washing fake grass and from drip of the fog and rain will wash along with it crumbled particles from this material and *end up in the Ocean and clogging drainage systems.*

2. *Fumes from the exhaust* of multiple buses every single day coming from every corner of the Bay Area with teams renting the fields cannot be controlled or mitigated against by any means what-so-ever.

3. *Parking will be a nightmare* because the proposed parking lot will not be sufficient to handle private autos and buses for long hours.

4. *Public transit is not sufficiently close* as to make transit of multiple groups of children and equipment feasible. Private autos will clog side streets and adjacent neighborhoods.

5. *Multiple other events* will be scheduled on these fields because RPD cannot resist the temptation of charging big-bucks for the use of public park facilities. The result will be multiplication of current big event problems from traffic, trash, noise, disturbances to residents, and over-use of public gardening staff who should be maintaining other parks.

Respectfully,
Andrea & Rick O’Leary
830 Teresita Blvd.
SF, CA 94127
From: Dennis O'Rorke [mailto:daororke@aol.com]
Sent: Friday, December 02, 2011 2:46 PM
To: bill wycko@sfgov.org
Cc: Sunsetfog@aol.com; parkladydi1@sbcglobal.net; martythelark@aol.com; zangsf1@gmail.com; sfoceanedge@earthlink.net
Subject: Beach Chalet DEIR

Commissioners,

I oppose the installation of ten sixty foot artificial light towers in the Beach Chalet area. In addition, I am opposed to replacing natural grass with synthetic turf. I do not believe that the impact of this proposed artificial lighting on wildlife and residents is adequately addressed in the DEIR.

I feel that the impact of additional crowds on the adjacent neighborhood is understated. Having friends and relatives living in that area, I constantly hear about the growing impact of large crowds on the daily life of this community, marathons, Bay to Breakers, Surf contests, etc.

Golden Gate Park was intended to be an "Oasis in the City", a refuge from urban cares. Free to all, regardless of economic status. All structures were to be rustic in nature. As Planning Commissioners, this is a plan to stick with.

Thank you for your time and consideration,

Dennis O'Rorke
1360 McAllister Street
San Francisco, CA.
94115
Wetlands and not into toxic material. This project is not only short-sighted; it is selfish in its exclusive views of all animals who like humans require water, migratory food. Most sincerely,

Constance K. Paskey

Dear Sir: RECEIVED 12.7.11

DEC 6 9 2011
CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
ME A

The CIP for conversion to synthetic turf at this specific location does not look deeply at the looming crisis for all Boy communities as ocean rise. If anything these very important locations should be converted into
December 8, 2011

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

RE: Beach Chalet Athletic Fields Renovation
Draft Environmental Impact Report
Planning Department Case No. 2010.0016E
State Clearinghouse No. 2011022005

Dear Mr. Wycko:

The purpose of this letter is to urge the Planning Department staff to seriously consider an alternative in the EIR to the currently proposed plan to completely transform the Beach Chalet Soccer Fields from a low profile set of fields to an intensely modern sports complex with artificial turf and network of lights.

I am a founding member of the Northern California Chapter of the Historic American Landscapes Survey (HALS). Modeled on the Historic American Building Survey (HABS) HALS is a documentation program that was created by the National Park Service in 2000. The purpose of HALS is to document our nation’s cultural landscapes for future generations by preparing measured drawings, written histories and archival photography.¹ Our HALS chapter is charged with making citizens, public agencies and commissions aware of the importance of cultural landscapes and why they are an important part of our heritage.

DEIR Deficiencies
I have reviewed the DEIR and find that it is deficient in several critical aspects. First, the DEIR fails to analyze the impacts of the proposed changes in the context of the entire park. Instead, the impacts analysis focuses exclusively on the western portion of the park. In fact, I was unable to find a single exhibit

¹ These documents are all sent to the Library of Congress and made available online or in printed form to scholars and all researchers.

Chris Cathy Christopher
Pattillo Garrett Kent
444 - 17th Street  Oakland CA 94612
Tel 510.465.1284  Fax 510.465.1256
within the bound portion of the DEIR that shows the entire park. It is essential that the entire park be included in the analysis. Golden Gate Park was designed as a single unit and needs to be consistently viewed in that context. For example, imagine that a museum curator decided it would be a good idea to alter the painting of the Mona Lisa – possibly adding a bright and dazzling ring. Would such a change have a profound affect on the entire painting? I dare say yes. Similarly, by adding artificial turf and 70 new light standards to the Chalet Fields the character of the entire park would be impacted – this needs to be studied in the DEIR.

Your department needs to consider the cumulative impacts of past, current and proposed changes within the entirety of Golden Gate Park. For example, there is little attention given to the proposed Westside Water Treatment Plant. This project will have a major impact on the overall uses and experience of the western end of the park, and, combined with the soccer fields, will turn this end of the park into more of a suburban corporate park than a place to escape the urban environment. Considering cumulative impacts will necessitate expanding every section of the DEIR and making changes to the exhibits.

Second, the proposed mitigations are woefully inadequate. The DEIR clearly acknowledges on page ES-3 that “The proposed project would cause a substantial adverse change in the significance of a historical resource as defined in CEQA ...” On page IV.C-28 the DEIR notes, “After completion of the project, the Beach Chalet Athletic Fields would no longer be a contributor to the Golden Gate Park National Historic District because its integrity would be substantially reduced ....” This is an extremely significant issue. One would expect the DEIR to propose major mitigations to offset such a significant loss, but on page ES-9 the only mitigation proposed is a minor change to the layout and materials for the circulation paths. Serious consideration must be given to defining adequate mitigation measures that fully compensate for the loss of this historic resource.

Third, the DEIR fails to include an analysis of the maintenance costs that compares a new artificial turf field with a newly renovated, state of art, living grass field. This should include replacement costs of the artificial turf after 10 years (the standard warranty length) and the expense to repair vandalism and all other expenses involved in maintaining both types of fields. It should be done over a 20 year period to allow for the cost of artificial turf field replacement. Doing so may very well demonstrate that the anticipated savings is less than what would justify the proposed project.

Golden Gate Park is known world-wide for its naturalistic landscape. Golden Gate Park is an extremely significant, naturalistic landscape. Just a few years ago the city of San Francisco initiated efforts to have it listed on the
National Register of Historic Places – the highest level of recognition that can be achieved by a cultural landscape.

It is interesting to note the current relevance of the design intent of the park as described in the 2004 National Register nomination. On page 41 of section 8 the author notes, "Golden Gate Park was also important for its role in advancing the art of park design. .... Ballfields, courts and playgrounds were considered "urban" intrusions that would conflict with the experience of nature that Olmsted strove to provide. .... these features were skillfully added to Golden Gate Park in a way that preserved the naturalistic features of the landscape. .... providing a natural escape from urban life." The summary statement of the NRHP Registration form cites Golden Gate Park, "as one of the pioneering examples of the large urban park in the United States .... it has regional significance .... as the first naturalistic landscape park in the west." In this light the proposed anti-natural changes to the Beach Chalet Fields is particularly ironic.

It is also noteworthy, on page 44 of the National Register nomination that the author notes, "Residents from all social classes are actively involved in the preservation of the park and protecting it from urban intrusions." It seems this is a never ending endeavor - citizens and their representatives need to be steadfast in holding off the incessant push to urbanize the park.

The park’s National Register designation means that it is important not only locally but also at a national level, and given the number of international visitors that come to Golden Gate Park one could argue that it has international stature. As such the city has a duty to not only protect the park for residents, but also to retain its attraction for visitors. This is a commercially smart action to take. In addition to that, San Francisco needs to protect is as an internationally-known cultural resource. San Franciscans like to weigh in on issues or causes in other countries, but we often neglect to realize the value of what is right here under our noses.

Project Alternatives
Part VI of the DEIR offers a number of alternatives that would reduce the impacts on this resource. Regrettably none by itself offers a viable alternative which would meet most of the Project Objectives.

I strongly encourage you to consider a combination of the alternatives #2, #3 and #4. Alternative #2 identifies an alternate location for new fields and should be thoroughly explored – West Sunset Playground has been suggested as a possible suitable location. From Alternative #3 can be taken the proposal for renovating the existing natural grass fields. And from Alternative #4 can be taken again the idea of no lighting. This combination of renovating a field
outside of Golden Gate Park while renovating the natural grass at the Beach Chalet fields with real grass and no lights would meet the majority of the project objectives, while retaining the essence of the historic fields.

Conclusions
While I understand the need to provide sufficient fields to accommodate the demand, I question the logic of impacting a treasured historic resource to do so. You should question the premise that the Beach Chalet fields should be renovated to the extent that a 200 percent increase in play time is an acceptable idea at this location. The current budget could provide a high tech drainage system, water conserving irrigation system, and modern day stormwater management. Such improvements would preclude the need for artificial turf.

You should direct the Recreation and Parks staff to seek an alternative that represents a compromise between those who demand increased play time and those who wish to retain the historic character of the pastoral landscape envisioned by the park’s original designer – William Hammond Hall. Hall expressed this sentiment,

“a park therefore, ...... should be an agglomeration of hill and dale, meadow, lawn, wood and coppice presenting a series of sylvan and pastoral views, calculated to banish all thought of urban objects.”

The Beach Chalet fields are a valuable cultural resource. I know you will hear from sports advocates and feel pressured to accommodate their demands. But unstructured recreation and enjoyment of nature are also valid needs, and these park uses serve a broader spectrum of people, in terms of age, economic status, and physical ability, than does a limited-use athletic activity. I understand that you need to be responsive to all parties, and I believe that is achievable. Please use your authority to conceive a compromise that will retain the historic integrity of the fields.

Chris Pattillo
Historic Landscape Architect
President, PGAdesigninc
November 15, 2011

Historical Commission
San Francisco Planning Department
1650 Mission Street
San Francisco, CA94103

RE: Beach Chalet Athletic Fields Renovation – Comments on DEIR – Case No. 2010.0016E

Dear Members of the Historical Commission,

I am a founding member of the Northern California Chapter of the Historic American Landscapes Survey (HALS). HALS is a documentation program, modeled on the Historic American Building Survey (HABS), that was created by the National Park Service in 2000. The purpose of HALS is to document our nation’s cultural landscapes for future generations by preparing measured drawings, written histories and archival photography. These documents are all sent to the Library of Congress and made available online or in printed form to scholars and all researchers. Our HALS chapter is also charged with making citizens, public agencies and commissions such as yours aware of the importance of cultural landscapes and why they are an important part of our heritage.

Our chapter became aware of the proposed renovation plans for the athletic fields at the Beach Chalet in 2010 and decided to begin the HALS documentation process. Volunteers have completed a short history, archival photography, and made progress on a measured drawing that depicts the fields as they exist today.

This introduction to the Beach Chalet soccer fields made me aware of the fields as a cultural resource and unique component of Golden Gate Park. While I understand the need to provide sufficient fields to accommodate the demand, I question the logic of impacting a treasured historic resource in doing so. Part VI of the DEIR offers a number of alternatives that would reduce the impacts on this resource. I strongly encourage your commission to seriously consider the alternatives to the proposed project. Identifying an alternative location for these fields should be thoroughly explored – West Sunset Playground has been suggested as a possible suitable location.

Chris Pattillo
Cathy Garrett
Christopher Kent

444 - 17th Street Oakland CA 94612
Tel 510.465.1284 Fax 510.465.1256
Another alternative that would significantly reduce the impacts would be a combination of alternatives 3 and 4 presented in the DEIR – this would provide renovated fields with real turf and no lights. While such an approach does not meet all of the applicant’s desired criteria, it would meet many of the stated objectives while retaining the essence of the historic fields.

Another concern is that the analysis of the cumulative impacts presented in the DEIR focuses on only a small portion of park. It is essential that the entire park be included in this analysis. Your commission needs to consider the cumulative impacts of past, current and proposed changes within Golden Gate Park.

You should question the premise that the Beach Chalet fields should be renovated to the extent that they will be able to accommodate up to 1000 people for day and night games, and that a 200 percent increase in play time is a good idea at this location. The DEIR tells us that one of the four fields is currently unusable at any given time due to maintenance, so by correcting drainage, rodent and other routine problems the parks department could increase field use by 25% while having essentially no impact on the cultural resource.

As members of the Historical Commission I needn’t tell you that the Beach Chalet fields are a valuable cultural resource, but I know you will hear from sports advocates and feel pressured to accommodate their demands. I understand that you need to be responsive to all parties, and I believe that is achievable. Please use your authority to conceive a compromise that will retain the historic integrity of the fields.

Chris Pattillo
Historic Landscape Architect
December 12, 2011

Mr. Bill Wycko, Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103-2479

Subject: Beach Chalet Athletic Fields Renovation

Comments on the Draft EIR
Planning Department Case #2010.0016E
State Clearinghouse #2011022005

Mr. Wycko:

I am writing in support of the Compromise Alternative put forth by the public during the Planning Commission hearing on December 1, 2011. This would include renovating all fields with natural grass. We need to protect the natural green open spaces that this city has, and that should be our focus.

One major problem with artificial turf is that most types are extremely toxic. While the draft EIR does lay out guidelines for acceptable levels of Lead, Chromium, and Zinc, it needs to do more. The levels in the draft EIR are written in mg/L and the equivalent of ppm (parts per million) should be included because lead levels are required to be under 50 ppm, per the consent judgment by then Attorney General Gerry Brown in 2009. Also, there are other toxic materials in artificial turf besides Lead, Chromium, and Zinc so a more complete list should be included.

Setting out standards for artificial turf is not the same as choosing an actual artificial turf product. Without actual product information, comparisons cannot be made. It is imperative that an artificial turf product (or a few possible products) be chosen before the environmental impact of the artificial turf is analyzed so that proper comparisons to natural grass can be made.

Also, if artificial turf is installed, there should be a requirement to have it tested periodically to make sure that it meets the requirements set forth in the draft EIR.

Also, the artificial turf manufacturers need to guarantee that they will uninstall their product at the end of its life and recycle it. Artificial turf is much like interior carpet, and many interior carpets are now being recycled. If this is not a requirement, these projects will generate tons of landfill waste. San Francisco has a goal of no landfill waste by the year 2030. It is simply irresponsible for us to allow these projects to be exempt from this goal.
While the draft EIR does give a natural grass alternative, it does not compare natural grass with artificial turf. This comparison must take all relevant items into account, including, but not limited to the following issues:

--installation, maintenance, and replacement
--toxicity
--water use and drainage
--temperature
--incorporation (or destruction) of the existing park’s environment (grass, soil, trees, animals, insects, birds, etc.)
--uses (such as types of sports and other events)
--accessibility to everyone, including wheelchair users and parents with strollers
--carbon footprint

There are several existing case studies and actual data from recently installed fields that can be analyzed.

I would like to request that you notify me of all progress made on this project. This would include (but not be limited to) notifying me of all meetings and sending me all meeting notes and all other documentation. (You can send me information via e-mail. My e-mail address is below.)

Thank you very much for your work on this issue.

Sincerely,

Edward P. Pertcheck
L.E.E.D. Accredited Professional
83 Scotia Avenue
San Francisco, CA 94124
(415) 336-1593
ependercheck@yahoo.com

cc: Dan Mauer, Project Manager
    Recreation and Parks Department
    McLaren Lodge and Annex
    501 Stanyan Street
    San Francisco, CA 94117
Mark Buell, President
Recreation and Park Commission
McLaren Lodge and Annex
501 Stanyan Street
San Francisco, CA 94117

Mayor Ed Lee
City Hall, Room 200
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102
From: Charles Pfister [mailto:calidris@earthlink.net]
Sent: Monday, December 12, 2011 9:35 AM
To: don.lewis@sfgov.org; bill.wycko@sfgov.org
Cc: sfoceanedge@earthlink.net
Subject: The Draft EIR for the Beach Chalet Athletic Fields

Mr. Wycko,

I live in the Outer Sunset. I am greatly in favor of the Compromise Alternative. I cannot say that I have carefully reviewed the DEIR. However, I looked at two sections, Off Site Alternatives and Aesthetics, and found them to be terribly biased for the full project. Given the sensitive nature of the site and the apparent conflict with the Master Plan, it would be appropriate to assume the precautionary principle in assessing impacts. For example, at night the lighting could have a much greater visual impact that depicted, if there were low-hanging clouds from a marine layer. The assumption is apparently made in Aesthetics that because there are already various illuminations in the night-time environment, some additional lighting would not be significant. In fact, the size and character of the lighting of the athletic fields would change my perception of the character of the interface of the Park and the Ocean and that part of the Park generally. The DEIR clearly is wrong on Aesthetics because many people in fact are disturbed by the impacts of the project and oppose the full proposed project. The DEIR should mention that the Aesthetic impacts would be very significant for a large proportion visitors to the Park.

I suspect that citizen groups that have pointed out significant flaws with the DEIR have made an accurate analysis. Please carefully address their concerns.

In following this issue over the past years in the media, I have been disturbed by the degree with which the Park & Rec Department seems to be influenced by and willing to cooperate with powerful lobby groups. There was no real reason to specifically push for this large-scale project, except that a well-funded and politically connected group of people wanted it. There are plenty of alternatives. The DEIR seems to be just a boilerplate of the carefully crafted arguments of this lobbying group and simply ignores or gives little consideration to the many arguments against the project.

Finally, I would like to see some specific data on the degree of illumination that could occur on Ocean Beach near the Park under various atmospheric conditions. If there is any additional illumination on the Beach, it could affect the Beach as habitat for wildlife, as, for example, many shorebirds on the beach, including the Western Snowy Plover, are night-time feeders and could be affected by any change in illumination.

Sincerely,
Charles Pfister
San Francisco, CA 94116
Miriam Pinchuk
1336 Willard Street, Apt. E
San Francisco, CA 94117

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

RE: Draft Environmental Impact Report on renovation of the Beach Chalet Athletic Fields
Planning Department Case No. 2010.0016E
State Clearinghouse No. 2011022005

Dear Mr Wycko,

I am submitting these comments in response to the Draft Environmental Impact Report for
the renovation of the Beach Chalet Athletic Fields.

Of most concern to me is the lack of peer-reviewed scientific and medical data on the
health and environmental impacts of artificial turf that uses tire-crumb infill. I have worked
as a medical editor for more than 10 years, editing research papers and medical
information. (My clients include the BMJ [British Medical Journal] and the World Health
Organization.) This is why I have several concerns about the data presented in the
Draft EIR.

The data presented seem to have been chosen selectively rather than representatively.
There is no indication of why the studies included in the report were chosen instead of
other, more recent studies; there is no indication of the criteria used to select studies for
inclusion; and there is no indication why literature searches were not done to update the
references cited in the reports included in the Draft EIR. This raises several questions that
need thorough answers.

- **Who selected the studies cited in the draft EIR?** What are this person’s
  qualifications for selecting relevant studies and assessing their findings?

- **Does this person have any conflicts of interest that would influence the studies
  that s/he selected or the interpretation of their results?** (For example, what is his
or her view on the proposed project and could this have influenced the decision about which studies were included?)

- **Was this person asked about conflicts of interest? If not, why not?**

It is common for most medical and scientific journals to ask authors to declare any conflicts of interest that they may have or any interests that may be perceived as biasing their judgment. *JAMA* (the *Journal of the American Medical Association*) sums up conflicts of interest this way:

"A conflict of interest may exist when an author (or the author's institution or employer) has financial or personal relationships or affiliations that could influence (or bias) the author's decisions, work, or manuscript. All authors are required to complete and submit the ICMJE Form for Disclosure of Potential Conflicts of Interest. In this form, authors will disclose all potential conflicts of interest, including relevant financial interests, activities, relationships, and affiliations..., including

Any potential conflicts of interest 'involving the work under consideration for publication' (during the time involving the work, from initial conception and planning to present),

Any 'relevant financial activities outside the submitted work' (over the 3 years prior to submission), and

Any 'other relationships or activities that readers could perceive to have influenced, or that give the appearance of potentially influencing' what is written in the submitted work (based on all relationships that were present during the 3 years prior to submission).

Authors are expected to provide detailed information about all relevant financial interests, activities, and relationships within the past 3 years as stipulated in the ... Form ... including, but not limited to, employment, affiliation, grants or funding, consultancies, honoraria or payment, speakers' bureaus, stock ownership or options, expert testimony, royalties, donation of medical equipment, or patents planned, pending, or issued...."

Additionally, the *BMJ* (the *British Medical Journal*) asks authors

"to disclose four types of information. Firstly, their associations with commercial entities that provided support for the work reported in the submitted manuscript (the time frame for disclosure in this section of the form is the lifespan of the work being reported). Secondly, their associations with commercial entities that could be viewed as having an interest in the general area of the submitted manuscript (the time frame for disclosure in this section is the 36 months before submission of the manuscript). Thirdly, any similar financial associations

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1 Instructions for authors: conflicts of interest and financial disclosures. *JAMA* [http://jama.ama-assn.org/site/misc/ifora.xhtml#ConflictsofInterestandFinancialDisclosures, accessed December 4, 2011].
involving their spouse or their children under 18 years of age. Fourthly, non-financial associations that may be relevant to the submitted manuscript.\textsuperscript{2}

Clearly, it is important that the people who selected and reviewed the studies that were included in the Draft EIR have appropriate skills and knowledge; they should also be asked to declare any conflicts of interest to ensure that the public benefits from a complete and unbiased report.

- **What specific criteria were used to select studies for inclusion?** Only a handful of studies are cited, yet in a 15-minute search on a publicly accessible database of peer-reviewed biomedical research (PubMed, part of the National Library of Medicine at the National Institutes of Health)\textsuperscript{3} I found far more studies than were included in the Draft EIR. I was able to identify numerous scientifically valid studies on hazards associated with artificial turf, on MRSA and artificial turf, and studies on injuries that compared artificial turf with grass playing fields. The two most recent studies evaluating the possible toxicity of artificial turf were published in 2011. Neither of these studies was included in the Draft EIR. I have appended to this letter a selection of the most recent studies that I identified (there are too many to provide all of them); although it is only a selection, it serves to show how much valid data were overlooked by the Draft EIR. Please include these studies as part of my comments. I would like to know why studies such as these were not included in the Draft EIR. And I would like to know why no databases of scientific and medical literature were searched.

- **Why were the studies included not limited to those that had been peer-reviewed?** Peer-review is the “gold standard” in scientific publishing: research is reviewed by those who are specialists in an area to determine the validity of the data collected, the methods used to collect the data, the statistics used to analyze the data, and the conclusions drawn. Peer-review is also used to weed out conflicts of interest that may have affected the results of a study.


\textsuperscript{3} Medline, which is the largest component of PubMed, selects journals for inclusion in its database using a number of criteria including *Quality of editorial work*: The journal should demonstrate features that contribute to the objectivity, credibility, and quality of its contents. These features may include information about the methods of selecting articles, especially on the explicit process of external peer review; statements indicating adherence to ethical guidelines: evidence that authors have disclosed financial conflicts of interest; timely correction of errata; explicit responsible rejections as appropriate; and opportunity for comments and dissenting opinion.... “Complete guidelines are available at http://www.nlm.nih.gov/pubs/factsheets/jset.html.
One of the primary reviews cited by the Draft EIR is the 2008 report by the San Francisco Recreation and Parks Department’s Synthetic Playfields Task Force. The Draft EIR states that “…the Task Force report includes a complete listing of all literature reviewed” (section IV, page H-6). However, the 2008 task force seems not to have reviewed any scientifically valid data for the sections on Material Composition: Overall Chemical Composition and Flammability Issues and Material Composition: Ingestion – Inhalation of Turf Product Materials. Appendix B – the master list of studies consulted by the task force – cites only non-peer reviewed communications with manufacturers of artificial turf, studies performed for the artificial-turf industry, non-reviewed reports commissioned by the SF Department of the Environment, and a couple of other questionable reports that were neither published nor peer-reviewed. Additionally, the “Ecosystem study group” did not even prepare a formal written summary.

In light of the lack of scientifically valid evidence used to compile the 2008 report, and the clear conflicts of interest present in some of the “data,” I would ask that mention of the 2008 report and any of its conclusions be removed from all sections of the Draft EIR, and that the Draft EIR does not rely on any findings from the 2008 report.

- Why wasn’t a search done to update the references in the reports cited in the Draft EIR? In addition to the 2008 task-force report, section IV, subsection H, of the Draft EIR reviews studies from 2007 (the Integrated Waste Management Board Study), 2009 (the Office of Environmental Health Hazard Assessment Study) and 2010 (California Department of Resources Recycling and Recovery Study). The latest date for any study included in these reports is 2009; thus the research cited by the Draft EIR is not up-to-date. All of these studies were commissioned, and none seems to have been peer-reviewed. (This is in contrast to the studies conducted in Connecticut that are cited in the Draft EIR; all were peer-reviewed by an independent agency.) The Draft EIR cites no studies from 2011, and also neglected to include relevant, independent research conducted on playing fields in San Francisco.⁴

While I realize that as Commissioner Borden stated, the Commission will never have all the evidence it needs to make any decision, surely it is the responsibility of the Planning Department and the Commission to assess all of the current, relevant literature regardless of whether the findings are conclusive. At least then the public would know that an evidence-based decision had been made rather than one that relied on evidence selected to support foregone conclusions.

The low standards used in preparing the 2008 task-force report and the fact that it was included in the Draft EIR despite its obvious shortcomings, seem a clear warning that much of the other data presented about risks to health and the environment should be subject to scrutiny by an independent expert.

I ask that, given the dearth of appropriate, scientifically valid, and current data presented in the Draft EIR, an unbiased, independent expert – that is, someone without any interest in the outcome of the project – who has knowledge of scientific method and research, conducts a thorough review and evaluation of the relevant medical and scientific literature before any conclusions are drawn about the hazards of artificial turf – either to the the environment or to health – and its ability to reduce injuries. This person must declare all actual and potential conflicts of interest before undertaking these tasks. Additionally, if reports that are not readily accessible to the public are cited, then they should be included in the Draft EIR for the public to review. I realize that not all of the data favor my position on the artificial-turf fields, but as an interested citizen I would rather that the evidence be assessed fairly and without bias.

I further ask that only scientifically valid, reliable studies that have been peer-reviewed or published in peer-reviewed journals be included in the EIR, especially in Section IV, subsection H, for without valid studies, the report cannot draw valid conclusions.

Thank you for considering my comments.

Sincerely,
Miriam Pinchuk

5 In some areas the findings are conclusive. Contrary to the arguments put forward by City Fields and their supporters, the evidence on injury is clear: there is no difference in the number of injuries sustained on grass playing fields compared with artificial-turf fields; there is no difference in terms of the number of minor injuries or in the number of severe injuries. The only difference is in terms of the types of injuries.
Artificial-turf playing fields: contents of metals, PAHs, PCBs, PCDDs and PCDFs, inhalation exposure to PAHs and related preliminary risk assessment.


Source

Department of Environment and Primary Prevention, Istituto Superiore di Sanità, Viale Regina Elena 299, 00161 Rome, Italy.

Abstract

The artificial-turf granulates made from recycled rubber waste are of health concern due to the possible exposure of users to dangerous substances present in the rubber, and especially to PAHs. In this work, we determined the contents of PAHs, metals, non-dioxin-like PCBs (NDL-PCBs), PCDDs and PCDFs in granulates, and PAH concentrations in air during the use of the field. The purposes were to identify some potential chemical risks and to roughly assess the risk associated with inhalation exposure to PAHs. Rubber granulates were collected from 13 Italian fields and analysed for 25 metals and nine PAHs. One further granulate was analysed for NDL-PCBs, PCDDs, PCDFs and 13 PAHs. Air samples were collected on filter at two fields, using respectively a high volume static sampler close to the athletes and personal samplers worn by the athletes, and at background locations outside the fields. In the absence of specific quality standards, we evaluated the measured contents with respect to the Italian standards for soils to be reclaimed as green areas. Zn concentrations (1 to 19 g/kg) and BaP concentrations (0.02 to 11 mg/kg) in granulates largely exceeded the pertinent standards, up to two orders of magnitude. No association between the origin of the recycled rubber and the contents of PAHs and metals was observed. The sums of NDL-PCBs and WHO-TE PCDDs+PCDFs were, respectively, 0.18 and 0.67×10(-5) mg/kg. The increased BaP concentrations in air, due to the use of the field, varied approximately from <0.01 to 0.4 ng/m(3), the latter referring to worst-case conditions as to the release of particle-bound PAHs. Based on the 0.4 ng/m(3) concentration, an excess lifetime cancer risk of 1×10(-6) was calculated for an intense 30-year activity.

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PMID:
21907387

[PubMed - in process]
Benzothiazole toxicity assessment in support of synthetic turf field human health risk assessment.

Ginsberg G, Toal B, Kurland T.

Source

Connecticut Dept of Public Health, Hartford, Connecticut 06106, USA. gary.ginsberg@ct.gov

Abstract

Synthetic turf fields cushioned with crumb rubber may be a source of chemical exposure to those playing on the fields. Benzothiazole (BZT) may volatilize from crumb rubber and result in inhalation exposure. Benzothiazole has been the primary rubber-related chemical found in synthetic turf studies. However, risks associated with BZT have not been thoroughly assessed, primarily because of gaps in the database. This assessment provides toxicity information for a human health risk assessment involving BZT detected at five fields in Connecticut. BZT exerts acute toxicity and is a respiratory irritant and dermal sensitizer. In a genetic toxicity assay BZT was positive in Salmonella in the presence of metabolic activation. BZT metabolism involves ring-opening and formation of aromatic hydroxylamines, metabolites with mutagenic and carcinogenic potential. A structural analogue 2-mercaptobenzothiazole (2-MBZT) was more widely tested and so is used as a surrogate for some endpoints. 2-MBZT is a rodent carcinogen with rubber industry data supporting an association with human bladder cancer. The following BZT toxicity values were derived: (1) acute air target of 110 µg/m(3) based upon a BZT RD(50) study in mice relative to results for formaldehyde; (2) a chronic noncancer target of 18 µg/m(3) based upon the no-observed-adverse-effect level (NOAEL) in a subchronic dietary study in rats, dose route extrapolation, and uncertainty factors that combine to 1000; (3) a cancer unit risk of 1.8E-07/µg-m(3) based upon a published oral slope factor for 2-MBZT and dose-route extrapolation. While there are numerous uncertainties in the BZT toxicology database, this assessment enables BZT to be quantitatively assessed in risk assessments involving synthetic turf fields. However, this is only a screening-level assessment, and research that better defines BZT potency is needed.

PMID:
21797770

[PubMed - indexed for MEDLINE]
Human health risk assessment of synthetic turf fields based upon investigation of five fields in Connecticut.


Source

Connecticut Dept of Public Health, Hartford, Connecticut 06106, USA. gary.ginsberg@ct.gov

Abstract

Questions have been raised regarding possible exposures when playing sports on synthetic turf fields cushioned with crumb rubber. Rubber is a complex mixture with some components possessing toxic and carcinogenic properties. Exposure is possible via inhalation, given that chemicals emitted from rubber might end up in the breathing zone of players and these players have high ventilation rates. Previous studies provide useful data but are limited with respect to the variety of fields and scenarios evaluated. The State of Connecticut investigated emissions associated with four outdoor and one indoor synthetic turf field under summer conditions. On-field and background locations were sampled using a variety of stationary and personal samplers. More than 20 chemicals of potential concern (COPC) were found to be above background and possibly field-related on both indoor and outdoor fields. These COPC were entered into separate risk assessments (1) for outdoor and indoor fields and (2) for children and adults. Exposure concentrations were prorated for time spent away from the fields and inhalation rates were adjusted for play activity and for children's greater ventilation than adults. Cancer and noncancer risk levels were at or below de minimis levels of concern. The scenario with the highest exposure was children playing on the indoor field. The acute hazard index (HI) for this scenario approached unity, suggesting a potential concern, although there was great uncertainty with this estimate. The main contributor was benzothiazole, a rubber-related semivolatile organic chemical (SVOC) that was 14-fold higher indoors than outdoors. Based upon these findings, outdoor and indoor synthetic turf fields are not associated with elevated adverse health risks. However, it would be prudent for building operators to provide adequate ventilation to prevent a buildup of rubber-related volatile organic chemicals (VOC) and SVOC at indoor fields. The current results are generally consistent with the findings from studies conducted by New York City, New York State, the U.S. Environmental Protection Agency (EPA), and Norway, which tested different kinds of fields and under a variety of weather conditions.

PMID:
21797769

[PubMed - indexed for MEDLINE]
Characterization of substances released from crumb rubber material used on artificial turf fields.

Li X, Berger W, Musante C, Mattina MI.

Source

The Connecticut Agricultural Experiment Station, 123 Huntington Street, New Haven, CT 06511, USA.

Erratum in


Abstract

Crumb rubber material (CRM) used as infill on artificial turf fields can be the source of a variety of substances released to the environment and to living organisms in the vicinity of the CRM. To assess potential risks of major volatilized and leached substances derived from CRM, methods were developed to identify organic compounds and elements, either in the vapor phase and/or the leachate from CRM. A qualitative method based on solid phase micro-extraction (SPME) coupled with gas chromatography/mass spectrometry (GC-MS) was developed to identify the major volatile and semi-volatile organic compounds out-gassing from CRM samples under defined laboratory conditions. Direct vapor phase injection into the GC-MS was applied for the quantitative analysis. Ten organic compounds were identified in the vapor phase by the SPME method. Volatile benzothiazole (BT) was detected at the highest level in all commercial CRM samples, in the range 8.2-69 ng g(-1) CRM. Other volatile PAHs and antioxidants were quantified in the vapor phase as well. A decrease of volatile compounds was noted in the headspace over CRM samples from 2-years-old fields when compared with the virgin CRM used at installation. An outdoor experiment under natural weathering conditions showed a significant reduction of out-gassing organic compounds from the CRM in the first 14 d; thereafter, values remained consistent up to 70 d of observation. Zinc was the most abundant element in the acidified leachate (220-13000 microg g(-1)), while leachable BT was detected at relatively low amounts.

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PMID: 20435333

[PubMed - indexed for MEDLINE] [FULL-TEXT ARTICLE]
Toxicological assessment of coated versus uncoated rubber granulates obtained from used tires for use in sport facilities.


Source

IBB/Center for Chemical and Biological Engineering, Instituto Superior Técnico, and Chemical Engineering Department, Instituto Superior de Engenharia de Lisboa, Lisboa, Portugal.
jgomes@deq.isel.ipl.pt

Abstract

Reuse of tire crumb in sport facilities is currently a very cost-effective waste management measure. Considering that incorporation of the waste materials in artificial turf would be facilitated if the rubber materials were already colored green, coatings were specifically developed for this purpose. This paper presents an experimental toxicological and environmental assessment aimed at comparing the obtained emissions to the environment in terms of polycyclic aromatic hydrocarbons (PAHs), heavy metals, and ecotoxicity for coated and noncoated rubber granulates. This study is a comprehensive evaluation of the major potential critical factors related with the release of all of these classes of pollutants because previous studies were not systematically performed. It was concluded that between the two types of coatings tested, one is particularly effective in reducing emissions to the environment, simultaneously meeting the requirements of adherence and color stability.

PMID:
20565000
[PubMed - indexed for MEDLINE]
Metals contained and leached from rubber granulates used in synthetic turf areas.

Bocca B, Forte G, Petrucci F, Costantini S, Izzo P.

Source

Department of Environment and Primary Prevention, Istituto Superiore di Sanità, Viale Regina Elena 299, 00161 Rome, Italy. beatrice.bocca@iss.it

Abstract

The aim of this study was to quantify metals contained in and leached from different types of rubber granulates used in synthetic turf areas. To investigate the total content of metals, ca 0.5 g of material was added with HNO(3), HF and HClO(4) and microwave digested with power increasing from 250 W to 600 W. Leachates were prepared by extraction of about 5.0 g of material at room temperature for 24 h in an acidic environment (pH 5). Leaching with deionized water was also performed for comparison. Aluminium, As, Ba, Be, Cd, Co, Cr, Cu, Hg, Fe, Li, Mg, Mn, Mo, Ni, Pb, Rb, Sb, Se, Sn, Sr, Ti, V, W and Zn were quantified by high-resolution inductively coupled plasma mass spectrometry (HR-ICP-MS) and ICP optical emission spectrometry (ICP-OES). Results indicated that the developed method was accurate and precise for the multi-element characterization of rubber granulates and leachates. The total amount and the amount leached during the acidic test varied from metal to metal and from granulate to granulate. The highest median values were found for Zn (10,229 mg/kg), Al (755 mg/kg), Mg (456 mg/kg), Fe (305 mg/kg), followed by Pb, Ba, Co, Cu and Sr. The other elements were present at few units of mg/kg. The highest leaching was observed for Zn (2300 microg/l) and Mg (2500 microg/l), followed by Fe, Sr, Al, Mn and Ba. Little As, Cd, Co, Cr, Cu, Li, Mo, Ni, Pb, Rb, Sb and V leached, and Be, Hg, Se, Sn, Tl and W were below quantification limits. Data obtained were compared with the maximum tolerable amounts reported for similar materials, and only the concentration of Zn (total and leached) exceeded the expected values.

PMID:
19155051
[PubMed - indexed for MEDLINE]
Characterization and potential environmental risks of leachate from shredded rubber mulches.

Kanematsu M, Hayashi A, Denison MS, Young TM.

Source

Department of Civil and Environmental Engineering, University of California-Davis, CA 95616, United States.

Abstract

In order to determine whether shredded rubber mulches (RM) pose water quality risks when used in stormwater best management practices (BMPs) such as bioretention basins, batch leaching tests were conducted to identify and quantify constituents in leachates from RM such as metals, nutrients, total organic carbon (TOC), and aryl hydrocarbon receptor (AhR) activity (determined by the chemically activated luciferase gene expression (CALUX) bioassay) at varied temperature and initial pH values. The results indicate that aqueous extracts of RM contain high concentrations of zinc (Zn) compared with wood mulches (WM), and its concentration increased at lower pH and higher temperature. Although methanol extracts of RM displayed high AhR activity, none of the aqueous extracts of RM had significant activity. Hence, while unknown constituents that have significant AhR activity are present in RM, they appear to be not measurably extracted by water under environmental conditions relevant for stormwater (5<pH<9, 10<T<40 degrees C). Our results suggest that organic constituents in water extracts of RM which have AhR activity may not be of significant concern while leaching of Zn from RM appears to be a potentially larger water quality issue for RM.

PMID: 19450864
[PubMed - indexed for MEDLINE]
PMCID: PMC2735888
Hazardous chemicals in synthetic turf materials and their bioaccessibility in digestive fluids.

Zhang JJ, Han IK, Zhang L, Crain W.

Source

School of Public Health, University of Medicine and Dentistry of New Jersey, 683 Hoes Lane West, Piscataway, New Jersey 08854, USA. jjzhang@ehs.rutgers.edu

Abstract

Many synthetic turf fields consist of not only artificial grass but also rubber granules that are used as infill. The public concerns about toxic chemicals possibly contained in either artificial (polyethylene) grass fibers or rubber granules have been escalating but are based on very limited information available to date. The aim of this research was to obtain data that will help assess potential health risks associated with chemical exposure. In this small-scale study, we collected seven samples of rubber granules and one sample of artificial grass fiber from synthetic turf fields at different ages of the fields. We analyzed these samples to determine the contents (maximum concentrations) of polycyclic aromatic hydrocarbons (PAHs) and several metals (Zn, Cr, As, Cd, and Pb). We also analyzed these samples to determine their bioaccessible fractions of PAHs and metals in synthetic digestive fluids including saliva, gastric fluid, and intestinal fluid through a laboratory simulation technique. Our findings include: (1) rubber granules often, especially when the synthetic turf fields were newer, contained PAHs at levels above health-based soil standards. The levels of PAHs generally appear to decline as the field ages. However, the decay trend may be complicated by adding new rubber granules to compensate for the loss of the material. (2) PAHs contained in rubber granules had zero or near-zero bioaccessibility in the synthetic digestive fluids. (3) The zinc contents were found to far exceed the soil limit. (4) Except one sample with a moderate lead content of 53 p.p.m., the other samples had relatively low concentrations of lead (3.12-5.76 p.p.m.), according to soil standards. However, 24.7-44.2% of the lead in the rubber granules was bioaccessible in the synthetic gastric fluid. (5) The artificial grass fiber sample showed a chromium content of 3.93 p.p.m., and 34.6% and 54.0% bioaccessibility of lead in the synthetic gastric and intestinal fluids, respectively.

PMID:
18728695

[PubMed - indexed for MEDLINE]
A review of football injuries on third and fourth generation artificial turfs compared with natural turf.

Williams S, Hume PA, Kara S.

Source

Sports Performance Research Institute New Zealand, School of Sport and Recreation, Auckland, New Zealand.

Abstract

Football codes (rugby union, soccer, American football) train and play matches on natural and artificial turfs. A review of injuries on different turfs was needed to inform practitioners and sporting bodies on turf-related injury mechanisms and risk factors. Therefore, the aim of this review was to compare the incidence, nature and mechanisms of injuries sustained on newer generation artificial turfs and natural turfs. Electronic databases were searched using the keywords 'artificial turf', 'natural turf', 'grass' and 'inj*'. Delimitation of 120 articles sourced to those addressing injuries in football codes and those using third and fourth generation artificial turfs or natural turfs resulted in 11 experimental papers. These 11 papers provided 20 cohorts that could be assessed using magnitude-based inferences for injury incidence rate ratio calculations pertaining to differences between surfaces. Analysis showed that 16 of the 20 cohorts showed trivial effects for overall incidence rate ratios between surfaces. There was increased risk of ankle injury playing on artificial turf in eight cohorts, with incidence rate ratios from 0.7 to 5.2. Evidence concerning risk of knee injuries on the two surfaces was inconsistent, with incidence rate ratios from 0.4 to 2.8. Two cohorts showed beneficial inferences over the 90% likelihood value for effects of artificial surface on muscle injuries for soccer players; however, there were also two harmful, four unclear and five trivial inferences across the three football codes. Inferences relating to injury severity were inconsistent, with the exception that artificial turf was very likely to have harmful effects for minor injuries in rugby union training and severe injuries in young female soccer players. No clear differences between surfaces were evident in relation to training versus match injuries. Potential mechanisms for differing injury patterns on artificial turf compared with natural turf include increased peak torque and rotational stiffness properties of shoe-surface interfaces, decreased impact attenuation properties of surfaces, differing foot loading patterns and detrimental physiological responses. Changing between surfaces may be a precursor for injury in soccer. In conclusion, studies have provided strong evidence for comparable rates of injury between new generation artificial turfs and natural turfs. An exception is the likely increased risk of ankle injury on third and fourth generation artificial turfs. Therefore, ankle injury prevention strategies must be a priority for athletes who play on artificial turf regularly. Clarification of effects of artificial surfaces on muscle and knee injuries are required given inconsistencies in incidence rate ratios depending on the football code, athlete, gender or match versus training.

PMID: 21985213  [PubMed - in process]
**Comparison of the incidence, nature and cause of injuries sustained on dirt field and artificial turf field by amateur football players.**

Kordi R, Hemmati F, Heidarian H, Ziaee V.

**Source**

The Sports Medicine Research Centre, Tehran University of Medical Sciences, Tehran, Iran. ramin_kordi@tums.ac.ir.

**Abstract**

**BACKGROUND:** Data on the incidence, nature, severity and cause of match football injuries sustained on dirt field are scarce. The objectives of this study was to compare the incidence, nature, severity and cause of match injuries sustained on dirt field and artificial turf field by amateur male football players.

**METHODS:** A prospective two-cohort design was employed. Participants were 252 male football players (mean age 27 years, range 18-43) in 14 teams who participated in a local championship carried on a dirt field and 216 male football players (mean age 28 years, range 17-40) in 12 teams who participated in a local championship carried on a artificial turf field in the same zone of the city. Injury definitions and recording procedures were compliant with the international consensus statement for epidemiological studies of injuries in football.

**RESULTS:** The overall incidence of match injuries for men was 36.9 injuries/1000 player hours on dirt field and 19.5 on artificial turf (incidence rate ratio 1.88; 95% CI 1.19-3.05). Most common injured part on dirt field was ankle (26.7%) and on artificial turf was knee (24.3%). The most common injury type in the dirt field was skin injuries (abrasion and laceration) and in the artificial turf was sprain and ligament injury followed by haematoma/contusion/bruise. Most injuries were acute (artificial turf 89%, dirt field 91%) and resulted from player-to-player contact (artificial turf 59.2%, dirt field 51.4%). Most injuries were slight and minimal in dirt field cohort but in artificial turf cohort the most injuries were mild.

**CONCLUSIONS:** There were differences in the incidence and type of football match injuries sustained on dirt field and artificial turf.

The effect of playing surface on injury rate: a review of the current literature.

Dragoo JL, Braun HJ.

Source

Department of Orthopaedic Surgery, Stanford University, Palo Alto, California, USA.

Abstract

Synthetic playing surfaces are widely used for field and court sports. Artificial turf surfaces are commonly used as an alternative to natural grass, while outdoor surfaces like clay and acrylic are also prevalent. The effect of these synthetic surfaces on injury rates has not been clearly established. The available literature is largely limited to football and soccer data and the majority of studies are short-term. Confounding variables such as climate, player position and footwear, as well as varying definitions of injury, also make it difficult to draw firm conclusions about the general effect of artificial playing surfaces on injury rates. Many peer-reviewed studies cite a higher overall rate of injury on first- and second-generation artificial turf surfaces compared with natural grass. Despite differences in injury type, the rate of injury on third-generation and natural grass surfaces appears to be comparable. It also appears that clay is significantly safer than either grass or hard court tennis surfaces, but this is a conclusion drawn with limited data. Further research investigating overall injury trends as well as sport-specific data is needed to draw more definitive conclusions regarding the effect of artificial playing surfaces on injury rates.

PMID: 20942512

[PubMed - indexed for MEDLINE]
Playing field issues in sports medicine.

Wright JM, Webner D.

Source

Crozer-Keystone Health System, Springfield, PA 19064, USA. jmwright76@gmail.com

Abstract

The use of artificial turf on playing fields has increased in popularity. Advances in technology have allowed for the development of turf that closely mimics the properties of natural grass. Overall injury incidence does not differ between the two surfaces, but unique injury patterns are apparent between the two surfaces. Differences in shoe-surface interface, in-shoe foot loading patterns, and impact attenuation may provide insight into the different injury patterns. Player perceptions of artificial turf vary and may be related to different physiological demands between the two surfaces. Artificial turf has been implicated in skin infections, but concerns about other health consequences related to the synthetic materials have not been proven yet. Understanding the differences between artificial turf and natural grass will help physicians, athletic trainers, and coaches better care for and train their athletes.

PMID:

20463494

[PubMed - indexed for MEDLINE]

Aoki H, Kohno T, Fujiya H, Kato H, Yatabe K, Morikawa T, Seki J.

Source
Department of Orthopaedic Surgery, St. Marianna University School of Medicine, 2-16-1, Sugao, Miyamae-ku, Kawasaki, Kanagawa 216-8511, Japan. h2aoki@marianna-u.ac.jp

Abstract

OBJECTIVE: To investigate the incidence of acute injuries and soccer-related chronic pain from long-term training and during matches in adolescent players using natural grass turfs (NT) and artificial turfs (AT).

DESIGN: Case-controlled prospective study.

SETTING: Institutional-level Fédération Internationale de Football Association Medical Centre of Excellence.

PARTICIPANTS: Youth soccer players (12-17 years of age) from 6 teams, with a predominant tendency to train on either NT or AT, were included. Of 332 players enrolled in this study, 301 remained to completion.

INTERVENTIONS: Medically diagnosed acute injuries and chronic pain were recorded daily by team health care staff throughout 2005, and reports were provided monthly to the authors.

ASSESSMENT OF RISK FACTORS: Noninvasive prospective study.

INDEPENDENT VARIABLES: Age and turf type.

MAIN OUTCOME MEASURES: Acute injuries per 1000 player hours on each surface and chronic complaints per 1000 player hours were evaluated according to frequency of surface used ≥ or = 80% of the time. Incidence rate ratio (IRR) of acute injuries and chronic complaints during play on NT and AT was calculated.

RESULTS: There was no significant difference in the incidence of acute injuries between the 2 surfaces during training and competition. However, the AT group showed a significantly higher incidence of low back pain during training (IRR, 1.62; 95% confidence interval, 1.06-2.48). Early adolescence and prolonged training hours were factors associated with an increased incidence of chronic pain in the AT group.

CONCLUSION: Adolescent players routinely training on AT for prolonged periods should be carefully monitored, even on AT conforming to new standards.

PMID: 20051727
[PubMed - indexed for MEDLINE]

**Comprehensive evaluation of player-surface interaction on artificial soccer turf.**

Müller C, Sterzing T, Lange J, Milani TL.

**Source**

Department of Human Locomotion, Institute of Sport Science, Chemnitz University of Technology, Chemnitz, Germany. clemens.mueller@hsw.tu-chemnitz.de

**Abstract**

The purpose of this study was to evaluate the traction characteristics of four different stud configurations on Fédération Internationale de Football Association (FIFA) 2-Star, third-generation artificial soccer turf. The investigated stud configurations were hard ground design, firm ground design, soft ground design, and an experimental prototype. The concept of this study combines performance, perception, biomechanical, and mechanical testing procedures. Twenty-five soccer players took part in the different testing procedures. Variables of this study were: running times, subjective rankings/ratings, ground reaction forces, and mechanical traction properties. Statistical discrimination between the four stud configurations was shown for performance, perception, and biomechanical testing (p < 0.05). Unsuit stud configurations for playing on artificial turf are characterized by less plain distributed and pronounced studs.

**PMID:**

21162364

[PubMed - indexed for MEDLINE]
Injury risk on artificial turf and grass in youth tournament football.

Soligard T, Bahr R, Andersen TE.

Source

Oslo Sports Trauma Research Center, Norwegian School of Sport Sciences, Oslo, Norway.

Abstract

The aim of this prospective cohort study was to investigate the risk of acute injuries among youth male and female footballers playing on third-generation artificial turf compared with grass. Over 60,000 players 13-19 years of age were followed in four consecutive Norway Cup tournaments from 2005 to 2008. Injuries were recorded prospectively by the team coaches throughout each tournament. The overall incidence of injuries was 39.2 (SD: 0.8) per 1000 match hours; 34.2 (SD: 2.4) on artificial turf and 39.7 (SD: 0.8) on grass. After adjusting for the potential confounders age and gender, there was no difference in the overall risk of injury [odds ratio (OR): 0.93 (0.77-1.12), P=0.44] or in the risk of time loss injury [OR: 1.05 (0.68-1.61), P=0.82] between artificial turf and grass. However, there was a lower risk of ankle injuries [OR: 0.59 (0.40-0.88), P=0.008], and a higher risk of back and spine [OR: 1.92 (1.10-3.36), P=0.021] and shoulder and collarbone injuries [OR: 2.32 (1.01-5.31), P=0.049], on artificial turf compared with on grass. In conclusion, there was no difference in the overall risk of acute injury in youth footballers playing on third-generation artificial turf compared with grass.

PMID:

20738822

[PubMed - as supplied by publisher]
Turf toe: soft tissue and osteocartilaginous injury to the first metatarsophalangeal joint.

Coughlin MJ, Kemp TJ, Hirose CB.

Source

Clinic at Saint Alphonsus, Boise, ID 83706, USA. footmd@aol.com

Abstract

The use of artificial turf in the United States has created a dramatic increase in first metatarsophalangeal joint dorsiflexion injuries. Turf toe has been reported to occur in athletes who participate in sporting activities. An injury to the plantar capsular ligamentous complex can result in acute and chronic pain, resulting in time lost from sports participation for a short- or long-term period. Classification of this injury is based on clinical findings and imaging studies, including plain radiographs and magnetic resonance imaging. The early recognition of this injury is crucial to successful treatment. Nonoperative treatment may often suffice for incomplete injuries; however, surgery may be warranted for a complete plantar plate disruption or injury to one or both sesamoids. In the high-performance or elite athlete, a turf toe or severe dorsiflexion injury can be disabling, and can threaten an athlete's career if not treated properly.

PMID:

20424406

[PubMed - indexed for MEDLINE]
Risk of injury on third-generation artificial turf in Norwegian professional football.

Bjørneboe J, Bahr R, Andersen TE.

Source

Department of Sports Medicine, Oslo Sports Trauma Research Center, Norwegian School of Sport Sciences, PO Box 4014 Ullevaal Stadion, 0806 Oslo, Norway. john.bjorneboe@nih.no

Abstract

BACKGROUND: Artificial turf is used extensively in both recreational and elite football in areas with difficult climatic conditions.

OBJECTIVE: To compare the risk for acute injuries between natural grass (NG) and third-generation artificial turf (3GAT) in male professional football. study design: Prospective cohort study.

METHODS: All injuries sustained by players with a first-team contract were recorded by the medical staff of each club, from the 2004 throughout the 2007 season. An injury was registered if the player was unable to take fully part in football activity or match play.

RESULTS: A total of 668 match injuries, 526 on grass and 142 on artificial turf, were recorded. The overall acute match injury incidence was 17.1 (95% CI 15.8 to 18.4) per 1000 match hours; 17.0 (95% CI 15.6 to 18.5) on grass and 17.6 (95% CI 14.7 to 20.5) on artificial turf. Correspondingly, the incidence for training injuries was 1.8 (95% CI 1.6 to 2.0); 1.8 (95% CI 1.5 to 2.0) on grass and 1.9 (95% CI 1.5 to 2.2) on artificial turf respectively. No significant difference was observed in injury location, type or severity between turf types.

CONCLUSION: No significant differences were detected in injury rate or pattern between 3GAT and NG in Norwegian male professional football.

PMID: 20820058 [PubMed - indexed for MEDLINE]
Comparison of injuries sustained on artificial turf and grass by male and female elite football players.

Ekstrand J, Hägglund M, Fuller CW.

Source

Department of Medical and Health Sciences, Linköping University, Linköping, Sweden Centre for Sports Medicine, University of Nottingham, Nottingham, UK.

Abstract

The objective of this study was to compare incidences and patterns of injury for female and male elite teams when playing football on artificial turf and grass. Twenty teams (15 male, 5 female) playing home matches on third-generation artificial turf were followed prospectively; their injury risk when playing on artificial turf pitches was compared with the risk when playing on grass. Individual exposure, injuries (time loss) and injury severity were recorded by the team medical staff. In total, 2105 injuries were recorded during 246,000 h of exposure to football. Seventy-one percent of the injuries were traumatic and 29% overuse injuries. There were no significant differences in the nature of overuse injuries recorded on artificial turf and grass for either men or women. The incidence (injuries/1000 player-hours) of acute (traumatic) injuries did not differ significantly between artificial turf and grass, for men (match 22.4 v 21.7; RR 1.0 (95% CI 0.9-1.2); training 3.5 v 3.5; RR 1.0 (0.8-1.2)) or women [match 14.9 v 12.5; RR 1.2 (0.8-1.8); training 2.9 v 2.8; RR 1.0 (0.6-1.7)]. During matches, men were less likely to sustain a quadriceps strain (P=0.031) and more likely to sustain an ankle sprain (P=0.040) on artificial turf.

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Risk of injury on artificial turf and natural grass in young female football players.

Steffen K, Andersen TE, Bahr R.

Source

Oslo Sports Trauma Research Center, Department of Sports Medicine, Norwegian School of Sport Sciences, Oslo, Norway. kathrin.steffen@nih.no

Abstract

BACKGROUND: Artificial turf is becoming increasingly popular, although the risk of injury on newer generations of turf is unknown.

AIM: To investigate the risk of injury on artificial turf compared with natural grass among young female football players.

STUDY DESIGN: Prospective cohort study.

METHODS: 2020 players from 109 teams (mean (SD) 15.4 (0.8) years) participated in the study during the 2005 football season. Time-loss injuries and exposure data on different types of turf were recorded over an eight-month period.

RESULTS: 421 (21%) players sustained 526 injuries, leading to an injury incidence of 3.7/1000 playing hours (95% CI 3.4 to 4.0). The incidence of acute injuries on artificial turf and grass did not differ significantly with respect to match injuries (rate ratio (RR) 1.0, 95% CI 0.8 to 1.3; p = 0.72) or training injuries (RR 1.0, 95% CI 0.6 to 1.5, p = 0.93). In matches, the incidence of serious injuries was significantly higher on artificial turf (RR 2.0, 95% CI 1.3 to 3.2; p = 0.03). Ankle sprain was the most common type of injury (34% of all acute injuries), and there was a trend towards more ankle sprains on artificial turf than on grass (RR 1.5, 95% CI 1.0 to 2.2; p = 0.06).

CONCLUSION: In the present study among young female football players, the overall risk of acute injuries was similar between artificial turf and natural grass.
A comparison of artificial turf.

Naunheim R, Parrott H, Standeven J.

Source

Departments of Emergency Medicine, Washington University, St. Louis, Missouri, USA. naunheir@msnotes.wustl.edu

Abstract

BACKGROUND: In an attempt to decrease injuries, newer forms of artificial turf have been marketed. The purpose of this study was to determine whether a new shredded rubber-based turf improves impact attenuation.

METHODS: An instrumented computerized impact recording device (IRD, Techmark, Lansing, MI) was dropped 20 times from a height of 48 inches onto five types of turf used by a professional football team.

RESULTS: Duncan's multiple range test shows that the new rubber-based field and the older foam field are not significantly different. There were significant differences, however, between sites on the shredded rubber-based field.

CONCLUSION: The change from a foam-based system to a shredded rubber-based system had no effect on impact attenuation overall. However, areas in the shredded rubber-based field were significantly compacted, causing some sites to be much harder than the foam-based surface it replaced.

PMID: 15625466
Yope Posthumus  
<yope@comcast.net>  
12/12/2011 03:22 PM

Re:

Public Comment on the Draft Environmental Impact Report  
Beach Chalet Athletic Fields Renovation  
Planning Department Case No. 2010.0016E  
State Clearinghouse No. 2011044005

Dear Mr. Wycko:

The DEIR states that the potential loss of the Beach Chalet Athletic Fields (or about 0.7% of the total) as a contributor to the Golden Gate Park National Historic District would not constitute a significant impact to the District as a historical resource. I suggest that this 0.7% is significantly higher if weighted for the prominent location of the Fields.

The Beach Chalet Athletic Fields are part of the defining western edge of Golden Gate Park across from the Pacific Ocean. They, along with the historic Windmills and Beach Chalet, constitute the major landmarks that represent the grand entrance to the Park from the west. The other recreational areas as one proceeds west - the Polo Fields, the golf course, the archery field, the Bercut Equitation field and the 45th Avenue Playground are all natural turf with no lights. The western end also contains many lakes and meadows. The introduction of a sports complex with artificial turf and stadium lights is out of character - aesthetically, historically and culturally - with the rest of the western portion of the Park. The sight of the 60-foot-tall galvanized steel light poles would be intrusive during the day. The lighting will be very intrusive on the extended neighborhood, as well as the beach area.

Please include an alternative in the DEIR that restores the Beach Chalet Soccer fields with natural grass and no lights. This alternative, combined with the off-site alternative in the DEIR, would keep the western edge of the Park "sylvan" and "pastoral" and provide more hours of play for youth soccer.

Sincerely,
Johannes Posthumus  
636 46th Avenue  
San Francisco, CA 94121
Bill Wycko  
Environmental Review Officer  
SF Planning Department  
Dear Bill,

Please take the time to go out to Crocker Amazon on a weekday night after 7 pm and see the the amount of physical activity on all 5 fields. Soccer, Lacrosse, Flag Football, Ultimate Frisbee, Pop Warner Football, Joggers, Walkers, Mothers pushing strollers, Families Strolling, Skateboarding. This amount of activity did not exist at the old Crocker. I know because I'll be 56 years old next week and I first started playing at Crocker when I was 7 years old. I grew up in Vis Valley. I've been coaching or playing at Crocker for almost 50 years.

These fields are keeping people ALIVE!!!

We the people of San Francisco who want to run, move and play desperately need a Crocker on the westside of town.

Please give us a new Beach Chalet with lights.

Please.

Thank You

Toby

Toby Rappolt  
Sunset Soccer Supply  
Apparel and Equipment Resource  
www.sunsetsoccer.com  
3401 Irving St. @ 35th Ave.  
San Francisco, CA  
94122-1313  
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Soccer Futuro
Team Travel to Brazil and Argentina
www.soccerfuturo.com
tel 1-866-285-4441

San Francisco Vikings Soccer Club
http://www.sfvsc.org/
Jmaie Ray
879 47th Ave.
San Francisco, CA 94121

Attention: Bill Wycko:

December 12 2011

Beach Chalet Athletic Fields Renovation 2009 Proposal

I appreciate that a draft environmental impact report was created by the San Francisco planning department in order to evaluate this extremely important issue. This report has led to further concerns that I and many of my neighbors have about this project.

It is requested that the Planning Department not approve this proposed project, as it would create significant negative impacts to the character of the west end of Golden Gate Park, degrade the park use experience of the 200,000 residents of the Sunset and Richmond district and other residents and tourists that enjoy the quiet naturalistic setting of the west end of the park, and will have significant adverse effects on the environment and our resident and migratory wildlife.

Specifically, it is requested that the Planning Department not approve the following components of this proposed project:

Installation of artificial turf
Installation of stadium lighting (150,000 kw of night lighting)
Field size enlargement
Barbeque area
Children’s play area
Concrete perimeter around fields
Lighting fixtures around field and pathways
Raised fencing height
Spectator seating that is excessive to needs of city resident games
10) Restroom renovation beyond sinks, toilets and baby changing areas

Clearly these soccer fields, and others in the City, require renovations and improvements to meet the needs of the growing soccer community in San Francisco, and in particular the need to have soccer fields available for children.

There is overwhelming evidence that sports in general are beneficial to children in terms of health, fitness, sportsmanship, leadership, and self-esteem.

As an ex soccer player and youth coach, I can attest to these many benefits. In my opinion soccer is the best sport overall for developing children, as it has broad appeal, is not gender specific, and is the world’s most popular and exciting sport, whether it be if a player or as a spectator.
The question is whether soccer is best played on artificial turf, or grass?

Soccer is typically a winter sport. While artificial turf may be appropriate for many areas of the US where winter conditions make playing on grass fields difficult or impossible, San Francisco's benign climate lends itself perfectly to use a natural grass surface.

The other issues are as follows:

**MRSA - Mersa or Staph**

**The biggest concern.**

MRSA infections are on the increase. The most rapidly growing staph infection is Community Acquired MRSA or CAMRSA.

- The Center for Disease Control or CDC estimates that MRSA kills more people per year in the US than AIDS.

- The CDC latest figures, from 2001 state that in American hospitals alone, Healthcare-Associated Infections (HAI's) account for an estimated 1.7 million infections and 99,000 associated deaths each year. These figures are 9 years old, and it can be safely assumed that the more recent figures would be alarmingly higher.

  http://www.cdc.gov/ncidod/dhqp/hai.html

Notwithstanding the extremely high fatality rate, the costs associated with overcoming the infections in a clinical setting are staggering.


In the course of my profession I was required to monitor the world wide issue of HAI's, and in particular MRSA. I maintained a website blog which over the course of two years there were over 4000 entries following and reporting on the worldwide spread of the potentially deadly bacteria.

Due to the prolific use of antibiotics in the past thirty years or so, this has become a worldwide problem as bacteria have become more and more resistant to antibiotics.

With regards to CA MRSA, this particular infection has been known to occur in many schools, colleges and universities, in particular affecting students, male or female, who are involved in sports.
Contact sports such as Football, Soccer, Wrestling, Lacrosse, and Gaelic Football all involve skin to skin contact, and present the potential for transmission of the bacteria from one person to another.

The infection can be harbored on equipment, on hard surfaces, clothing, Jacuzzis, towels, razors, footwear, door handles, gymnasium floors and mats, toilet seats, and artificial turf.

Outbreaks of CAMRSA have also been known to occur in prisons or areas where there can potentially be skin to skin contact. The Military have also seen concerning infection numbers.

- A study by the CDC found that athletes who sustained a skin burn from artificial turf were seven times more likely to develop a MRSA infection. Another study published in the Journal of Clinical Microbiology in 2000 found that MRSA survives better on artificial turf than on other surfaces.

- CA MRSA and MRSA are known to be particularly relevant in attacking people with compromised or undeveloped immune systems. Young children and the elderly are at particular risk of serious consequences from acquiring this infection.

- According to a 2007 report by the NFL Players Association, 61 percent of 1,511 players polled had negative reviews of artificial surfaces, with many believing artificial surfaces were more likely to cause injury and shorten players' careers.

  http://www.foxnews.com/story/0,2933,329065,00.html

Please also this article which appeared in Time magazine about the issue

  http://www.time.com/time/arts/article/0,8599,1853828,00.html

While the subject of MRSA has been addressed to some degree in the proposal, it seems to me that the potential dangers presented by the use of artificial turf have been minimized and require further research.

- A number of American hospitals have been sued in the past by families of patients who have contracted the bacteria and as a result have either died or have necessitated numerous live saving surgeries due to the extent of the infection.

These suits have been filed stating unsanitary practices or poor medical treatment. In many cases MRSA was not immediately diagnosed, leading to severe consequences.

- As of 2007, California Lawmakers implemented legislation requiring all California hospitals to report all HAI's including CA MRSA. These records should allow insight into infections resulting from artificial turf injuries.
The potential legal ramifications to the city of San Francisco as a result of a serious infection resulting in the death of a player cannot be understated.

To minimize or dismiss this potential serious issue would be a major oversight, and is worthy of further research.

I refer to these links below which will help explain the issue even further:

http://sportsinjuries.suite101.com/article.cfm/artificial_field_turf_vs_natural_grass_safety


http://fotp.org/advocacy/artificial-turf

**Injuries**

The proposal from Rec and Park states that one of the key factors they considered in promoting the use of artificial turf over grass was due to injuries sustained by the poor condition of the grass fields due to gopher holes.

- They quote one example of a player breaking an ankle. This begs the question is there statistics available staging the number of injuries incurred due to the poor condition of the field?

- They point to Garfield Square Playground stating that it was formerly known as "The Park where you break your foot". Are there any statistics available on the number of players that have actually broken their foot, or is this purely anecdotal?

Soccer is a contact sport, and it is inevitable that injuries will result from playing it. Most adult players have been injured in one way or another during the course of their careers.

This applies to amateur as well as professional players.

Other sports such as Lacrosse or Gaelic football are also contact sports which will also result in injuries.

While there is no specific evidence to suggest that there is more likelihood of injury by playing on artificial turf, the main cause for concern is rashes or burns acquired by the player having contact with the ground. This raises the MRSA issue.

- It is vital in the case of a potential infection or injury to ensure that the affected area is cleaned and protected as soon as possible.
• Within the proposal, with regards to the bathroom renovation, there has been no provision made for shower stalls. If a player has access to a shower immediately following injury this could severely reduce the chance for infection to set in.

• Currently players, after they leave the field, are reduced to either changing in the toilet or more commonly in the car before they head home to hopefully take a shower. Should there be a delay in showering, this again could result in infection taking hold.

• There is also the question of chemical infection occurring in a wound due to the composition of the turf, which in some cases is known to contain lead, chrome, zinc and possibly others.

http://www.cdc.gov/nceh/lead/tips/artificialturf.html

Another area where grass is better than artificial turf is in the length of the cleats required to play. Longer cleats used with grass reduce the possibility of a player slipping or twisting due to better stability.

Provisions should be made to improve the bathroom facilities to include showers for both male and female players regardless of which surface they should play on.

**Gophers**

Gophers live underground in every park or grassy area. In the case of Golden Gate Park, gophers are everywhere.

Any of the gardeners in the Park will state that this is one of their biggest challenges, as they are difficult to exclude from doing significant damage. While this is true of an area such as a golf course, in the case of the Beach Chalet soccer fields, is relatively easier and inexpensive to address.

• As the soccer fields are contained by a fence, by digging a trench 2 to 3 feet deep by 1 foot wide around the outer perimeter of the fence. Narrow gauge wire fencing is then put in to the trench, backfilled, thus providing an underground barrier that the gophers cannot pass through.

• Should the gophers attempt to enter through the fence; a barrier of small gauge wire can be added to the existing fence to provide yet another barrier.

**Other Areas of concern**

The following components are desired to be improved as listed

COM-670
Renovating restrooms to replace the toilet stall doors that have been missing for years, adding new mirrors, soap dispensers, modern toilet paper dispensers, hand dryers, sinks and baby changing tables in mens and womens bathrooms.

Adding lockers pose some risk of vandalism, but would not be opposed. Showers will attract homeless park dwellers and require excessive maintenance. Players can bring towels to wipe down, have room to change clothes, and will need to shower when they get home. Given the problems we have in Golden Gate Park, this is a concession players have to live with to play here.

In the UK, soccer is the national game, and hundreds of thousands of players play the game on a regular basis almost all the year around. In every organized soccer game the facilities are available to the players include showers, and in certain cases plunge baths.

In my opinion the bathroom facility would have to be expanded considerably to be able to effectively accommodate the players. This then raises a question of security for valuables, and protection against vandalism which could easily happen.

Building small areas of spectator seating that is in keeping with the naturalistic setting of the west end of Golden Gate Park. **There is no room to implement this additional fixture.**

**Improvements to and expansion of the parking lot by 8 spaces, as proposed.**

The proposal to increase the number of spaces in the soccer field parking lot by 8 spaces will not reduce the traffic congestion on weekends for the current primarily resident use of these fields. Intentionally attracting Bay Area Leagues to play on these fields will increase the number of spectators by many fold.

RPD states that Ocean Beach parking lots will accommodate the need for additional parking. Ocean Beach parking lots are full on sunny weekends year round. In order to accommodate the additional need for parking that will be generated by this proposal to expand field size to professional league competition size spectators would require RPD providing a minimum of 100 additional spaces, if only 25 spectators attended games on the four fields. In actuality, there could easily be 100 spectators that attend games on each of the 4 fields.

The logistics of a soccer tournament are as follows:

- 11 per side plus 3 substitutes = 14 = 28 players per game. Plus 2 coaches per team plus referees and 2 linesmen. = 33 total participants every 1½ hours (per game).
- Spectators can be expected to be at least 30 per game, and more likely 60 spectators which gives us 93 players x 4 fields = 400 people attending each 90 minutes.

If 5 games are hosted per field on a weekend day, this = 2000 people that will all need to park their cars.
It is difficult enough to park now, and bringing in this volume of people will make it an absolute nightmare. This clearly has not been thought through intelligently.

**Changes Character of the West End of Golden Gate Park**

Lengthening the fields will necessitate removing the windscreen hedge between the service road and the fields – contrary to the computer model images that City Fields has presented. (Just as City Fields admitted that the computer generated images they provided to represent the amount of light that will be generated by the stadium lights, and how much light would be seen from Sutro Park, was greatly under-represented.

The fields do not need to be expanded, they are perfectly fine as they stand right now and would meet any soccer leagues requirements.

Enlarging (lengthening) the fields is unnecessary and will take away the small walkway of grass around the fields that were fenced off from the public to walk on in the mid 90’s. I walk around these fields on the grass daily. Putting concrete walkways around the artificial turf fields will make this are unattractive for walking for pleasure. The green meadow of these fields is an ideal place to take a quiet walk.

**Stadium lighting.**

The lights will be seen for miles. This is in conflict with the city’s commitment to reduce nighttime light pollution to protect wildlife. (See environmental impact section) Not to mention our adoption of the Green City Initiative to reduce excess power usage.

**Noise**

Soccer fans get excited and make noise. It's the same the world over at any level. The noise levels will increase dramatically and spoil the peaceful experience of being in Golden gate Park.

**Garbage**

The amount of garbage generated by soccer tournaments is bad now. Increases exponentially and the garbage is increased exponentially. The overworked gardeners will now become full-time garbage collectors and the park will suffer greatly as a result.

**Safety**

Soccer can be a dangerous game for both players and spectators. Rivalries are commonplace, and things can get out of hand very easily result in people getting hurt. This includes nonparticipant passers by and residents.
Artificial turf in no way has the character of natural grass. It will change the look of the area and the feel of the area from one of a peaceful meadow when not in play, to one of industrial sports complex.

Traffic

RPD cannot expect us to believe the results of the traffic study they paid for. Current soccer field use on weekends causes excessive traffic congestion on JFK and MLK, between Bernice Way and the Great Highway.

Weekend demand currently creates traffic hazard to pedestrians, bicyclists, skaters and motorists: Traffic backs up on JFK & MLK as cars stop to wait for a parallel parking space to be vacated. Traffic stops while a car waits for a family to load all of their gear into their car and get themselves all aboard, then pull out, which involves waiting for cars passing the stopped car to create a break in the traffic. JFK & MLK are not wide enough to allow cars to safely pass a stopped car. This requires entering into the oncoming lane of traffic, along with skaters and bicyclists that are also passing the car that has stopped to obtain a “soon” to be vacated parking space. Between the time someone walks toward a vehicle to vacate a parking space and the time they actually pull out and into weekend traffic on JFK & MLK, upwards of 5 minutes may elapse. During this time, other cars, bicyclists and skaters are all trying to get around the car waiting for the parking space. Multiply this scenario several times, as several cars stop to gain parking in the distance between Bernice Way and the Great Highway on both JFK & MLK.

I respectfully request that this issue be reevaluated completely with new plans to include a grass surface, no lighting, improved bathroom facilities, improved parking.

This is Golden Gate Park, a world-famous park, one of the world's great parks and it deserves our very careful stewardship. If Mr. McLaren were alive today he would be mortified at some of these suggestions that have been made

Sincerely

Jamie Ray
879 47th Avenue
San Francisco, CA 94121
It is requested that the Planning Department not approve this proposed project. It would create significant negative impacts to the character of the west end of Golden Gate Park, degrade the park, negatively impact the quality of the park for park visitors who seek respite in nature, and have significant negative impacts on the environment and wildlife that also utilize the park. This will particularly affect the 200,000 residents of the Sunset and Richmond district that call Golden Gate Park our neighborhood park. All park users will be impacted by this unnecessary project.

We will hear sports fans not bird songs. Vuvuzelas, not the wind in the trees. This will increase already problematic traffic congestion on weekends in the west end of the park, create excessive garbage strewn about, light up the night sky when we walk at night, cause safety concerns when fans leave the park after night games, amongst other concerns. The issue of increasing daytime playtime on these fields can be addressed without adding night games, installing artificial (toxic) turf, and other proposed infrastructure. problem that could be resolved in a common sense way.

Specifically, I request that the Planning Department not approve the following components of this proposed project:

1) Installation of artificial turf
2) Installation of stadium lighting (150,000 kw of night lighting)
3) Field size enlargement
4) Barbeque area
5) Children’s play area
6) Concrete perimeter around fields
7) Lighting fixtures around field and pathways
8) Raised fencing height
9) Spectator seating that is excessive to needs of city resident games
10) Restroom renovation beyond sinks, toilets, changing room areas and baby changing areas.

The following components are not opposed

1) Renovating restrooms to replace the toilet stall doors that have been missing for years, adding new mirrors, soap dispenses, modern toilet paper dispensers, hand dryers, sinks and baby changing tables in mens and women’s bathrooms. Adding lockers pose some risk of vandalism, but would not be opposed. Showers will attract homeless
park dwellers and require excessive maintenance. Players can bring towels to wipe down, have room to change clothes, and will need to shower when they get home. Given the problems we have in Golden Gate Park, this is a concession players have to live with to play here.

2) Building small areas of spectator seating that is in keeping with the naturalistic setting of the west end of Golden Gate Park.

3) Improvements to and expansion of the parking lot by 8 spaces, as proposed.

4) Improving the maintenance of the fields in increase play days.

Jamie Ray
879 47th Avenue
San Francisco, CA 94121
Project “Need” - Debating the “Need” / Premise for this Proposed Project.

The stated need for this (excessively costly, intrusive and destructive) proposed project is to increase access to the Beach Chalet Soccer Fields, or more generally, resident access to playing fields.

The problem, according to RPD, is that one of the four fields is always being “rested” and that they sometimes have to close all the fields for “rain days” due to poor drainage.

The Beach Chalet Soccer Fields (BCSF) are under-utilized most weekdays. Our rainy season is comparatively short and mild. Weekend demand at present, does exceed the BCSF capacity some of the year.

The question is, can rainy season closures/drainage issues be addressed in an environmentally sound and neighbor friendly way? Can we reduce field “resting” to increase access to the fields on weekends when most teams play matches? Could we do this by hiring an actual turf specialist to maintain the fields and increase drainage issues for more winter use?

Or is the answer to spend $45 M, of which $20 M is tax payer bond funds that were approved to improve neighborhood parks throughout the city that are in desperate need of repairs - and build a sports complex?

RPD defers millions of dollars of needed capital improvement / maintenance projects in our parks every year. Children’s playgrounds are dilapidated and more are needed. Does this project really reflect the intent of the voters when they voted to approve these funds? Does this serve the park, park visitors, neighbors, the environment and wildlife?

And, is this project legal without a vote by residents? Our City Charter says, that enlarging or building any structure in Golden Gate Park requires a public vote. We’ve not voted to approve this!

RPD and City Fields believe the answer to the field resting and drainage issue is to build a sports complex which is in violation of the city charter, in violation of the Master Plan of Golden Gate Park, in violation of the expressed wishes of all non-soccer playing residents that have spoken during
public meetings, and in violation of our environmental policies that require us to use the most environmentally sound principles in all purchases and projects.

Not a single non-soccer playing member of the public has spoken in favor of this proposed project. Hundreds, if not thousands of people have vociferously stated their opposition to this proposed project.

Another option, far cheaper, more ecologically sound, and in keeping with the majority of park users who are not soccer players, is to address the turf problems by increasing drainage, and hiring a turf specialist that can keep all four fields available to the public on weekends. This is my preferred choice.

These fields have been inadequately maintained and thus not as available for public use as they could be.

RPD has claimed that they can’t afford to hire an athletic turf specialist to maintain these fields. Instead a gardener, without the highly specialized skills needed to maintain athletic fields to maximum capacity usage has been maintaining these fields in such a lackluster manner as to cause his work habits to be common knowledge amongst neighbors who don’t even have access to these fields.

If RPD can’t afford to pay someone with the skill needed to maintain the grass turf fields, is it reasonable to expect that funds will suddenly be available to provide the equally specialized maintenance of artificial turf and the entire proposed sports complex? Including maintaining shower rooms, and other facilities?

Or are the fields going to be privatized, with the Fisher brothers’ City Fields providing the funding for maintenance and operation? If so, the public hasn’t been told.

Proper care of these fields, including regular aeration to reduce compaction would reduce field closures due to rain and reduce the extent to which fields are currently “rested.” The Beach Chalet Soccer Fields rest on sand, beneath the sod’s (compacted) loam layer. Sand provides excellent drainage. If necessary, perforated drainage tubing could be installed under the turf to carry away excess water on heavy rain days, at minor cost. England plays
on grass throughout their heavily rainy winters as do many world class countries. Why can’t we? “The city that knows how.”

The answer is not a $45M capital improvement project, with maintenance to be added to the millions of dollars of deferred maintenance project repairs $20M of tax payer funds should be spent on increasing the quality of life for parks and park visitors across our city.

We should pay a turf specialist to improve drainage and overall field conditions to keep them available on weekends when demand exceeds current use capacity.

The majority of the components of this proposed project are unrelated to, and go far beyond addressing the stated need for residents to have increased access to the Beach Chalet / Golden Gate Park soccer fields on weekends and rainy days.

The majority of the components of this proposed project would adversely effect majority of residents who are park visitors and enjoy the relaxing naturalistic setting of the west end of the park, but particularly the 200,000 residents of the Sunset and Richmond district, for whom Golden Gate Park is our neighborhood park.

Golden Gate Park is becoming ever less hospitable for resident use as a neighborhood park, as it becomes ever more used as an event venue for marathons, concerts and the like.

This project would change the character of the park and negatively effect the environment and resident and migratory wildlife.

The west end of Golden Gate Park provides, and will hopefully continue to provide a place to get away from the noise and lights of the city and enjoy the quiet of nature. Bird songs, the wind in the trees… not blinding stadium lights and vuvuzelas.

If we need to further increase access for playing fields, we should partner with local schools so that our children can play their weekend games in their neighborhoods. Potentially walking or riding a bike to their games, rather than having to be driven to the westernmost edge of the city, hunting for
ages for a parking space, and adding to the car congestion in the park. Many school fields, parking lots and bleachers are un-used on weekends. Cities throughout the country utilize school fields for children’s weekend games. Why can’t we?

RPD claimed to have started a pilot program with schools to encourage athletics and fitness amongst their students. What happened to this program? City Fields (Fisher bothers) clearly want the focus to stay on building their sports complex, not viable alternatives.

Enlarging the size of the fields is an example of a component of this project that has nothing to do with the stated need— to increase access to the fields. Lengthening these fields will make it harder for our youth to play on these fields. They already struggle to play a full game on the existing full size fields.

This project is also proposed to decrease maintenance costs, but in fact creates an excessively maintenance-intensive infrastructure for which the city has no funds to maintain.

RPD’s Dan Mauer has stated that the existing fields are in less than ideal condition because RPD can’t afford to hire a gardener with the necessary knowledge and skill necessary to competently maintain athletic turf. He’s also said that artificial turf will reduce maintenance personel costs. However, artificial turf manufacturers and sales websites clearly state that artificial turf will not require less maintenance than natural turf. They both require a high degree of care. Artificial turf requires sweeping, “steam” cleaning for removal of bacteria such as MRSA, tear repairing, etc. Artificial turf cannot have sodas or other drinks spilled on it, and is flammable. Bacteria that harbors in artificial turf could cost the city plenty if someone becomes hospitalized for an infection and sues the city. Injuries are also known to increase on artificial turf. (see safety section)
In addition to significant maintenance of the artificial turf and replacement cost necessary in 6-8 years depending on use, this proposed project will add or increase the following maintenance (cost) needs:

- Daily (several times a day) cleaning of the showers, changing rooms and bathrooms. Currently gardeners are required to clean the soccer field and all other park bathrooms. Union efforts to protest that these maintenance duties are not part of their hired job description failed. This increased maintenance will decrease the quality of the park, as gardeners will spend even less time taking care of the park’s vegetation. Park gardener staffing is at a historic low.
- Increased garbage pickup will be required. After games, the amount of garbage strewn around is unbelievable. Currently, park gardeners spend an average of 1/3 of their time picking up garbage, not planting or maintaining the plants that make our parks beautiful.
- Increased garbage collection service will be needed. The garbage can located at the archery field was recently removed to cut the cost of garbage collection service.
- Increased fixture maintenance – lighting fixtures along paths, stadium lights, bathroom fixtures fixed or replaced as damaged, replacing toilet paper, fixing clogged showers and toilets, etc.
- Increased structure maintenance and graffiti control on structures.
- Increased maintenance of the parking lot, pathways, BBQ area, children’s play area, etc. The children’s play area nearby sorely needs maintenance attention.

Revenue garnered from increasing play from 3 fields to 4 on weekends and some rainy days, and adding night games, cannot possibly meet the increased maintenance costs that this project will create.

It’s unlikely that fees will cover the monthly cost of 150,000 watts of lighting each night until 10pm.

The last area of Need that the project sponsor has stated is the need to reduce water usage.

This is a non-issue from an environmental standpoint when compared to the environmental impacts of the proposed project.
Currently the water used to water the turf comes from a well. Excess water filters through the sand to the aquifer below. No pesticides or herbicides are used, according to RPD’s IPM department director (Ralph Montana). He states that golf courses, athletic fields and parks lawns are maintained without herbicides or pesticides, using only compost teas. CO2 is absorbed by natural grass. CO2 is not absorbed by artificial turf. CO2 is generated by the electricity needed to power 150,000 watts of lighting each night, when demand for night games is questionable at best. The benefits of grass in removing greenhouse gasses, emitting oxygen, providing a cool safe playing surface outweighs the water that is used for the benefit of providing athletic fields for the public.

The alternative proposed by RPD and City Fields is to lay down several tons of toxic car tire crumb, above the freshwater aquifer that serves as emergency water in case of a severe earthquake. These toxins will percolate down to this aquifer when it rains.

Neither the lighting or artificial turf are keeping with our Green City Initiative, the Precautionary Principle or our IPM policies. Water use is a minor issue in comparison.

The PUC intends to sell water to RPD for the soccer fields at a cost that far exceeds the current use of well water. This is an issue that should be addressed. Turf does not require Reverse Osmosis water! Well water has worked fine and should continue to be used.

Jamie Ray
879 47th Avenue
San Francisco, CA 94121
Hi Bill,

I wanted to ask a question about our city charter and the legality of building in Golden Gate Park without a public vote? (Attached below)

RPD told me when I enquired about utilizing 1/2 acre of the 4 acre parcel behind the soccer fields (that had been used for green waste composting) to build a small wildlife hospital and nature education center, that it would require a public vote.

I'm the director of San Francisco's only wildlife rehabilitation program for injured sick, oiled and orphaned wildlife. We'd hoped to use Prop 84 bond funds that were designated for new nature education centers to build a small wildlife hospital and state of the art nature education center that would allow the public to watch and learn about resident and migratory wildlife (and how we can all protect the environment) - utilizing streaming video of the patients as they progress through the rehabilitation process - onto large screens in the nature center.

Our proposal to RPD's capital improvement department also included a proposal to offer simple local organic food as well. I've recently heard that RPD has taken this suggestion for the old millwright house and adopted it.

This same property is now slated for a 40,000 square foot water treatment plant (MOU between RPD and PUC signed in Feb. 2010... without a public vote.

Shouldn't the water treatment plant and the soccer field expansion and complex of structures require a vote?

Could you please clarify why the soccer field complex project is not going to a citywide vote? Also, Prop A bond funds do not look like they apply for use on this project, as I believe RPD intends.

Lastly, I found a document in my files relating to the effects of artificial night lights on wildlife, should you choose to include this in environmental impact comments, due today.

Thank You, Bill.
1) Climate characteristics vary from one year to the next; it is not uncommon to experience cool summers, dry springs, and slow falls. A season’s photoperiod is the only consistent factor in the natural environment.

Therefore, many species of plants and animals rely on the length of the day to indicate the proper season for mating, molting, and other life cycle activities.

This photoperiodic sensitivity is often so acute that many species can detect discrepancies in natural light as short as one minute.

Reproduction cycles are most often disrupted when artificial light at night interferes with species’ natural detection systems.

Trees have been known to bud prematurely; some flowers cease blooming.

Artificial light also can cause animals such as squirrels and robins to mate out of season. Changes in plant and animal reproductive activity can create difficulty in finding food and increase chances of starvation.

2) Artificial light at night contributes to lack of food (starvation) by interfering with predator/prey relationships. For instance, moths and other night-flying insects are attracted to lights. This involuntary phototaxis leads to their easy capture. Their incessant gravitation toward artificial points of light not only makes them vulnerable as prey and subjects them to increased predation but disrupts the normal nocturnal patterns of predator species by creating an artificial feed concentration around points of light.

For some species of predators, such as bats, this disruption means a change in the concentration and location of their feed, which can lead to imbalances in predator/prey ratio. For species repelled by light, feed becomes scarcer and difficult to procure, as many insects swarm around lights, leaving fewer to be caught as they fly free. The decreasing amount of available food due to night lighting can effect the survival of these species. Most species of bats endemic to California are federally listed.

Hundreds of terrestrial bird species migrate under cover of night.
Skyscrapers and other night lighted pose collision / disorientation hazards.

During the 1960s, it is estimated that over a million birds a year were killed in collisions with lighted television towers in the United States. Since that time, the number and height of communication towers has increased exponentially.

The West End of Golden Gate Park is located on the Pacific Migratory Flyway. This area hosts an amazing diversity of resident and migratory wildlife and should not be degraded with nighttime flood lighting.

Our Green City Initiative and signing onto the precautionary principle which requires us to take the least environmentally damaging approach and to choose the one less invasive to the environment. It requires that we consider the biological effects on wildlife from the actions we take, and the policies we create.

The only beneficiaries of this intrusive and objectionable element are the Bay Area adult leagues that the city hopes will pay enough to cover the cost of replacing the artificial turf they play on.

Natural grass, properly maintained and drained is the environmentally sound solution to increase local playtime on the fields.

Jamie Ray
San Francisco Wildlife Rehabilitation
(415) 221-3498 (Direct)
Jamie_Ray@comcast.net
City Charter

SEC. 4.113. RECREATION AND PARK COMMISSION.
The Recreation and Park Commission shall consist of seven members appointed by the Mayor, pursuant to Section 3.100, for four-year terms. Members may be removed by the Mayor only pursuant to Section 15.105. Pursuant to the policies and directives set by the Commission and under the direction and supervision of the General Manager, the Recreation and Park Department shall manage and direct all parks, playgrounds, recreation centers and all other recreation facilities, avenues and grounds under the Commission’s control or placed under its jurisdiction thereafter, unless otherwise specifically provided in this Charter.
The Department shall promote and foster a program providing for organized public recreation of the highest standard.
The Department shall issue permits for the use of all property under the Commission's control, pursuant to the policies established by the Commission.
As directed by the Commission, the Department shall administer the Park, Recreation and Open Space Fund pursuant to Section 16.107 of this Charter.

The Department shall have the power to construct new parks, playgrounds, recreation centers, recreation facilities, squares and grounds, and to erect and maintain buildings and structures on parks, playgrounds, square, avenues and grounds, except as follows:
1. No building or structure, except for nurseries, equipment storage facilities and comfort stations, shall be erected, enlarged or expanded in Golden Gate Park or Union Square Park unless such action has been approved by a vote of two-thirds of the Board of Supervisors;
2. No park land may be sold or leased for non-recreational purposes, nor shall any structure on park property be built, maintained or used for non-recreational purposes, unless approved by a vote of the electors. However, with permission of the Commission and approval by the Board of Supervisors, subsurface space under any public park, square or playground may be used for the operation of a public automobile parking station under the authority of the Department of Parking and Traffic,
provided that the Commission determines that such a use would not be, in any material respect or degree, detrimental to the original purpose for which a park, square or playground was dedicated or in contravention of the conditions of any grant under which a park, square or playground might have been received. The revenues derived from any such use, less the expenses incurred by the Department of Parking and Traffic in operating these facilities, shall be credited to Recreation and Park Department funds. 3. The Commission shall have the power to lease or rent any stadium or recreation field under its jurisdiction for athletic contests, exhibitions and other special events and may permit the lessee to charge an admission fee. (Amended March 2000)
The Way It Is Now: The City operates and maintains hundreds of parks, playgrounds, recreation facilities, open spaces, and other properties throughout San Francisco. In 2000, the voters approved a $110 million general obligation bond to address the deterioration of some of these parks and recreation facilities due to age and overuse. The City has spent these funds repairing and improving safety at numerous neighborhood parks, but an independent review has shown that many parks and facilities remain outdated and still pose seismic and safety risks.

Most of the City's parks and open spaces are operated and maintained by the Recreation and Park Commission or the Port Commission.

In March 2007, the City adopted a 10-year Capital Plan that addresses the safety and seismic needs of City-owned buildings and property in San Francisco. The Capital Plan recommends the use and timing of general obligation bonds, the first of which is a parks and recreation facilities bond.

The City uses property tax revenues to pay principal and interest on general obligation bonds.

The proposal: Proposition A is a Bond Measure that would authorize the City to borrow $185 million by issuing general obligation bonds for the construction, reconstruction or improvement of park and recreation facilities located in San Francisco. Bond funds would be allocated as follows:

- $117.4 million for the following neighborhood parks: Chinese Recreation Center, Mission Playground, Palena Recreation Center, Cayuga Playground, McCoppin Square, Sunset Playground, Fulton Playground, Mission Dolores Park, Cabrillo Playground, Glen Canyon Park, Lafayette Park, and Raymond Kimbell Playground;
- $33.5 million for potential projects at some or all of the following waterfront parks: Pier 43 Bay Trail Link, Brannan Street Wharf Park, Bayfront Park at Mission Bay, Pier 70 Crane Cove Park, Warm Water Cove Park, Islais Creek Shoreline Parks, Heron's Head Park entrance, the Blue-Greenway Trail, and all Blue-Greenway projects;
- $11.4 million for park restrooms;
- $8.5 million for park athletic fields;
- $5 million for park nature trails;
- $5 million for a Community Opportunity Fund to finance the completion of community-nominated recreation and park projects; and
- $4 million for park forestry.

The Recreation and Park Commission or the Port Commission, the Board of Supervisors and the Mayor must approve expenditures of bond proceeds to finance these projects.

Proposition A follows the requirement under the City's Administrative Code that one-tenth of one percent (0.1%) of the proceeds of a bond measure be provided to the Citizen's General Obligation Bond Oversight Committee to oversee this bond's expenditures. This committee would be required to review annually and report on
the management of this bond program. In addition, the measure would require the City to maintain a website describing the bond program, progress achieved to date, and projections of future program activities.

Proposition A would require an increase in the property tax to pay for the bonds and would permit landlords to pass-through 50 percent of the resulting property tax increase to tenants.

URGENT NEED IN OUR PARKS

Proposition A is the first step in San Francisco's ten year capital plan to repair and rebuild the City's aging and broken physical structures, starting with heavily-used neighborhood parks. An independent analysis identified more than $1.7 billion in structural work needed in our parks.

This bond will fix our neighborhood parks where basic safety, cleanliness and accessibility are threatened. From Dolores Park to Sunset Playground, from Chinese Recreation Center to Palega Playground, we can protect the quality of parks across the City.

The bond will:

• Replace dangerous and broken playground equipment
• Repair or replace park restrooms
• Retrofit recreation centers and waterfront open space to make them earthquake safe
• Plant trees in parks throughout San Francisco
• Replace deteriorating athletic fields
• Restore nature trails in parks
• Create a blue-greenway of parks along the waterfront
• Provide matching grants for community-initiated, small-scale repairs

NO INCREASE IN THE PROPERTY TAX RATE

Clean and safe neighborhood parks Bonds, 2008
by the Ballot Simplification Committee
digest

notice to Voters:
the “Controller’s statement” and “How ‘a’ got on the Ballot” information on this measure appear on the opposite (facing) page.
A Clean and safe neighborhood parks Bonds, 2008
Controller's statement on “a”
On October 23, 2007 the Board of Supervisors voted 10 to 0 to place Proposition A on the ballot. The Supervisors voted as follows:
Yes: Supervisors Alioto-Pier, Ammiano, Chu, Daly, Duffy, Esbergd, Maxwell, Mirkarimi, Peskin and Sandoval.
excused: Supervisor McGoldrick.

How “a” got on the Ballot
City Controller Edward Harrington has issued the following statement on the fiscal impact of Proposition A:
Should the proposed $185 million in bonds be authorized and sold under current assumptions, the approximate costs will be as follows:
• In fiscal year 2007-2008, following issuance of the first series of bonds, and the year with the lowest tax rate, the estimated annual costs of debt service would be $900,000 and result in a property tax rate of $.0007 per $100 ($0.69 per $100,000) of assessed valuation.
• In fiscal year 2011-2012, following issuance of the last series of bonds, and the year with the highest tax rate, the estimated annual costs of debt service would be $16.4 million and result in a property tax rate of $0.0112 per $100 ($1.15 per $100,000) of assessed valuation.
• The best estimate of the average tax rate for these bonds from fiscal year 2007-2008 through 2029-2030 is $0.0077 per $100 ($7.71 per $100,000) of assessed valuation.
• Based on these estimates, the highest estimated annual property tax cost for the owner of a home with an assessed value of $400,000 would be approximately $43.83.
• Landlords would be allowed to pass through 50% of the annual property tax cost of the proposed bond to tenants as permitted in the City Administrative Code. Based on these estimates, the highest estimated annual cost for a tenant in a unit with an assessed value of $140,000 would be approximately $7,800.

These estimates are based on projections only, which are not binding upon the City. Projections and estimates may vary due to the timing of bond sales, the amount of bonds sold at each sale, and actual assessed valuation over the term of repayment of the bonds. Hence, the actual tax rate and the years in which such rates are applicable may vary from those estimated above. The City's current debt management policy is to issue new general obligation bonds only as old ones are retired, keeping the property tax impact from general obligation bonds approximately the same over time.

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URGENT NEED IN OUR PARKS

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The bond will:
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• Plant trees in parks throughout San Francisco
• Replace deteriorating athletic fields
• Restore nature trails in parks
• Create a blue-greenway of parks along the waterfront
• Provide matching grants for community-initiated, small-scale repairs

NO INCREASE IN THE PROPERTY TAX RATE
Under current City policy, these parks bonds will only be issued after old bonds are repaid. As a result, there will be no increase in the property tax rate used to repay these bonds.

STRICT ACCOUNTABILITY FOR PROGRESS AND SPENDING
To ensure that funds are properly spent, a citizen's bond oversight committee will track spending through independent audits; they are authorized to stop the sale of bonds if necessary. Major projects have already been identified and assigned budgets. Progress will be monitored through monthly reports at the Recreation and Parks and Port Commissions.

Unanimously passed at the Board of Supervisors.

Vote YES on Proposition A.

Mayor Gavin Newsom
Board President Supervisor Aaron Peskin
Supervisor Michela Alioto-Pier
Supervisor Tom Ammiano
Supervisor Carmen Chu
Supervisor Chris Daly
Supervisor Bevan Dufty
Supervisor Sean Elsbernd
Supervisor Sophie Maxwell
Supervisor Jake McGoldrick
Supervisor Ross Mirkarimi
Supervisor Gerardo Sandoval

reButtal to proponent’s argument In favor of proposItIon a

A Clean and safe neighborhood
parks Bonds, 2008
proponent’s argument In favor of proposition a

This disclaimer applies to the proponent's argument on this page. The Board of Supervisors authorized the submission of the follow-
ing argument. As of the date of the publication of this Voter Information Pamphlet, the following Supervisors endorse the measure:
Supervisors Alioto-Pier, Ammiano, Chu, Daly, Dufty, Elsbernd, Maxwell, McGoldrick, Mirkarimi, Peskin and Sandoval.

no rebuttal to proponent's argument in favor of proposition a was submitted.

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A

Clean and safe neighborhood parks Bonds, 2008

no opponent's argument against proposition a was submitted
no rebuttal to opponent's argument against proposition a was submitted

paid arguments in favor of proposition a

Yes on Prop A For the Health of Our City
Parks play an important role in maintaining our physical and mental health. Active recreation on our City's athletic fields helps keep our bodies in shape and fights obesity in our children. Hiking in our City's parks provides physical activity and relief from the pressures of urban living. A walk through our parks' woodlands, wildflowers, grasslands and wetlands lets us experience the tran-
quil and calming beauty of nature without leaving San Francisco. Unfortunately, our parks are older and worse for the wear. They need help to get back in shape. Prop. A restores San Francisco parks so we can get the exercise we need to stay healthy and the time in nature we need to stay sharp and at peace.

Yes on Prop. A.

*Sierra Club*

*San Francisco Tomorrow*

*Nature In The City*

The true source of funds for the printing fee of this argument is San Francisco Tomorrow.

Business, labor, tenants and homeowners agree – VOTE YES on A.

Your YES vote on A will extend critically important park and recreation center repairs and improvements to every city neighborhood.

Twelve projects from Cabrillo Playground in District One to Cayuga Playground in District Eleven, dozens of new park restrooms, renovated athletic fields, a unique neighborhood grants program, trail and forest maintenance and new parks along the waterfront – all with NO INCREASE IN THE PROPERTY TAX RATE!

The city's ten year capital plan provides for new bonds to be issued as old bonds are paid-off, which, along with normal growth in values, means no increase in tax rates.

Restore our parks and open up the waterfront to the public – vote YES on A.

*San Francisco Chamber of Commerce*

The true source of funds for the printing fee of this argument is the San Francisco Chamber of Commerce.

PAR supports Proposition A because it combines sound planning and sound financing to achieve safe and clean neighborhood parks across San Francisco. Recreation Centers receive seismic upgrades to make them earthquake safe; broken and dangerous playground equipment will be repaired and replaced; restrooms will be renovated and rebuilt; trees and trails will be planted and restored.

On February 5th, please join PAR in voting YES on Proposition A.

*Planning Association for the Richmond – PAR*

The true source of funds for the printing fee of this argument is the Planning Association for the Richmond.

Prop. A Protects Open Space in the City

San Francisco is home to an amazing diversity of plants, ani-
mals and geological features that have evolved and thrived in our open space parks. Prop. A will protect open space and restore the hiking trails that allow us access to these beautiful open spaces. It will help keep these parks healthy and enjoyable for years to come.

Jake Sigg, Chair
Conservation Committee
California Native Plant Society
Yerba Buena Chapter
The true source of funds for the printing fee of this argument is Jake Sigg.

YES ON PROP. A – Keep Improving our Parks
The Neighborhood Parks Council supports Prop. A because it provides an Opportunity Fund for all neighborhoods to access for small park projects, it provides new funds for trees and trails, and it fixes many playgrounds, toilets, recreation centers, and parks that are falling apart. Every neighborhood in San Francisco deserves high quality parks and park programs. Prop. A will get us one step closer to this goal.

Please join us in Voting YES on Prop. A.

Neighborhood Parks Council
The true source of funds for the printing fee of this argument is the Neighborhood Parks Council.

Clean and safe neighborhood parks Bonds, 2008

A

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Paid arguments in favor of proposition a
The San Francisco Democratic Party endorses and strongly supports Proposition A on the February 5th ballot and urges a YES vote.

This bond is necessary to ensure the safety and cleanliness of neighborhood parks for families and children: to make recreation centers earthquake safe, repair and replace broken playground equipment and lighting, fix park bathrooms, stabilize waterfront sea walls, expand disabled access to public facilities, protect and preserve trails and open space, and plant new trees.

The bond is subject to an annual independent audit with strict oversight by a citizens committee. Under the City's policy of selling new bonds only when old ones are repaid, we can fix our parks, but keep our taxes the same.

This bond is necessary and fair. YES ON A.

San Francisco Democratic Party
The true source of funds for the printing fee of this argument is the San Francisco Parks Trust.

YES on A – Support Our Neighborhood Parks
Proposition A will preserve and restore San Francisco's neighborhood parks. These are the parks we use every day for soccer and softball, for casual strolls and long distance runs, for pushing children in swings and watching birds in their nests. Our neighborhood parks serve as our collective backyards and provide needed respite from city living.

And they need our help.

Prop. A will fix up the parks and recreation centers with the most need, improve earthquake safety at high-risk recreation centers, repair broken playground equipment, fix broken lights, plant trees and rebuild walkways. Prop. A will fix these facilities and grounds while maintaining current tax rates.

Love Your Parks – Vote Yes on Prop. A

San Francisco Parks Trust
The true source of funds for the printing fee of this argument is the San Francisco Parks Trust.

San Francisco public schools depend on the resources and support of City parks and recreation facilities. This bond will rebuild recreation centers to make them earthquake safe and structurally sound; it reconditions pitted and overused athletic fields on which public school teams practice and compete. With limited funds available for public schools, this bond stretches the dollars by rebuilding neighborhood parks and facilities badly needed by the city's school children.
On February 5th, vote Yes on A
San Francisco School Alliance
The true source of funds for the printing fee of this argument is the
San Francisco School Alliance.
YES on Proposition A—Renovate our Parks and Playgrounds
Neighborhood parks improve our health, strengthen our community, provide places for our kids to play, and make our city a
better places to live and work. Proposition A will restore and
repair our parks and create clean safe places for our children.
YES on Proposition A—Green our city by Planting Trees
within our Parks
Trees help the environment by reducing air and water pollution,
and they also cool the city. Many of the trees now in our parks are
old, or diseased, and will likely die in the next few years. Prop. A
will let the city identify those parks where the need is greatest, and
plant new trees for our families to enjoy.
YES on Proposition A—Improve Access to our natural areas by
Fixing Hiking Trails
Many of the hiking trails in our parks are falling apart - victims
of heavy use and erosion. Prop. A will provide a way to repair
these trails so we can all enjoy them.
Please join us in repairing and preserving San Francisco's parks
and natural areas.
Vote YES on Proposition A
Trust for Public Land
The true source of funds for the printing fee of this argument is the
Trust for Public Land.

Clean and safe neighborhood

parks Bonds, 2008 A

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Paid arguments in favor of proposition A

Yes on Proposition A
Proposition A is "family friendly" and important to school children. For many City kids, neighborhood parks are their backyards. This bond repairs broken playground equipment, replaces damaged restrooms, installs safety lighting and rebuilds recreation centers to be earth-quake safe.
San Francisco desperately needs more athletic fields. Sports make all the difference in keeping kids engaged, in school, away from gangs and out of trouble. We need the sports fields this bond will provide.
The bond will plant trees and restore paths in natural areas, giving those kids who rarely leave the City a non-urban experience. Schools and parks are natural partners where kids are concerned.
Please vote YES.
Mark Sanchez, President – Board of Education*
Hydra Mendoza, Board of Education*
Eric Mar, Board of Education*
*For identification purposes only
The true source of funds for the printing fee of this argument is the San Francisco Parks Trust.
Prop. A – Restore Our Parks!
Prop. A means more trees, more plants and better park landscapes. Valuable staff time wasted patching together broken equipment will instead be devoted to maintaining the plants and landscapes that make our parks beautiful. Improved irrigation means athletic fields will be properly watered and ready for play. The department's forestry program will plant a new generation of trees in our parks to replace our many aging trees and restore trails so more people can access and enjoy the City's open space.
Give your neighborhood park gardener a hand.
Vote YES on Prop. A.
Laborer's, Local 261
The true source of funds for the printing fee of this argument is Laborers 261.
San Francisco urgently needs the greening effect of planting more trees in parks. Many of the nearly 100,000 trees currently in our parks were planted shortly after World War II and have a life expectancy of 30 or 40 years. Some are diseased and infested. Proposition A commits $4 million dollars to a long term effort to replace dying trees and add new ones. Not a moment too soon.
YES ON MORE TREES IN THE CITY.
YES ON A.

*Friends of the Urban Forest*

The true source of funds for the printing fee of this argument is Friends of the Urban Forest.

Over the past decade, green space in neighborhood parks have not received the attention it needs. Proposition A will restore trails in parks with natural areas and open space. It will increase the number of trees planted in city parks and it will upgrade and install irrigation systems so that the work that is done will be maintained.

Join us in supporting great neighborhood parks.

**YES ON A**

*Local 261’s City Committee*

The true source of funds for the printing fee of this argument is Laborers Local 261 City Committee.

The contributor to the true source recipient committee is Laborers Local 261 City Committee from membership dues.

Yes on A – Repair Parks Throughout the Community

Prop. A will rebuild neglected parks and recreation centers that are falling into disrepair. Chinese Recreation Center, Sunset Playground and Recreation Center, Palega Playground and Recreation Center, and Fulton Playground and Recreation Center will all receive seismic work to improve earthquake safety and renovate them into modern facilities that can better serve the thousands of residents who use them regularly.

Many communities have waited a long time for these repairs. Let’s make sure they happen.

**Clean and safe neighborhood parks Bonds, 2008**
paid arguments in favor of proposition a

YES on A

Chinese American Citizens' Alliance
The true source of funds for the printing fee of this argument is the Chinese American Citizens' Alliance.

Preserve Open Space Along the Bay
YES ON A
San Francisco's waterfront must be cherished and protected. Prop. A achieves these goals by turning difficult-to-access open space along the bayshore into a string of parks stretching to the City's southern edge. These green spaces are critical pieces of San Francisco's remarkable ecology and one of them, Heron's Head Park, is a vibrant wetland serving as an important haven for migratory birds.
San Francisco's unique environment provides habitats for wildlife like quail, coyotes and numerous species of birds, as well as wetlands that foster healthy bay and marine life.

San Francisco League of Conservation Voters
The true source of funds for the printing fee of this argument is the San Francisco League of Conservation Voters.

Yes on A – Smart Planning for Our Parks
Successful parks and open space are essential for a vibrant city.
Prop. A will rebuild and replace aging and unsafe structures in our neighborhood parks without increasing our tax rate.
As the first bond from our City's 10-year capital plan, Prop. A is a sound investment. Its tough accountability measures ensure that the bond program stays on budget and allows the public to track individual park projects through a city website. The measure also funds independent audits for a citizen's bond oversight committee that can stop the sale of bonds if necessary.
Funding park repairs on both Rec Park and Port property addresses the pressing needs for open space citywide in our neighborhoods and in new public spaces along the San Francisco Bay. Prop. A couples good public policy with responsible financing.
Vote Yes on Prop. A

SPUR
San Francisco Planning and Urban Research Association
www.spur.org
The true source of funds for the printing fee of this argument is the SPUR Voter Education Fund. The three largest contributors to the true source recipient committee are: 1. The San Francisco Planning and Urban Research Association, 2. Jean Fraser, 3. David Hartley.

Clean and safe neighborhood

parks Bonds, 2008 A

arguments printed on this page are the opinion of the authors and have not been checked for accuracy by any official agency.
arguments are printed as submitted. spelling and grammatical errors have not been corrected.

pald arguMents agaInst proposItIon a
Prop A is a jobs program disguised as a parks bond. San Francisco already has more public employees per capita than any other American city. For 50 years, the Parks Dept. managed to maintain and improve our parks using operating funds. In 2000 we gave them $110 million in new property taxes for improvements – did they spend it wisely? No. Remember the news stories, caught on tape, about park employees stealing plants and materials for their homes? They all still work for the City, and now they want $185 million more. The Parks Dept. needs new management, not new tax money. Don't believe the promises of the bond campaign – they won't deliver because there is no accountability.
Vote NO on Prop A.
San Francisco Taxpayers Union
The true source of funds for the printing fee of this argument is the San Francisco Taxpayers Union.

Clean and safe neighborhood
Looking for the legal text?

The full legal text of all ballot measures has been moved to the back of the book. The text starts on page 87.

This Measure requires 50%+1 affirmative Votes to pass.
Arguments For And Against this measure immediately follow this page. The full text begins on page 89. Some of the words used in the ballot digest are explained on page 61.
Features and Benefits of Natural Grass Sports Fields

To be fair, anyone strongly in favor of synthetic sports floors should consider the attributes of natural grass with the same enthusiasm. Honesty, most people take for granted all the great things grass plants do.

Features of natural grass sports fields:

0. **Environmentally friendly.** 2,500 square feet of living, growing grass plants release enough oxygen for a family of four for a year. Grass absorbs carbon dioxide, helping to reduce global warming.

0. **Microorganism utopia.** Grass and the topsoil are home to zillions of beneficial organisms that break down and recycle organic and inorganic products that fall into the grass.

0. **Aquifer recharger.** The area inside a typical high school football/track complex is about 2 acres. Over 2 million gallons of water from rain will fall on this area if it
rain 40 inches a year. Grass will filter the water as it flows into the groundwater.

0. **Cooler surface.** Grass provides a cooler place to play than bare dirt, cement, asphalt or artificial turf. This occurs because the photosynthetic process in the leaves intercepts sunlight, utilizing the sun's energy to make plant sugars instead of warming the dirt or other surface. Plants evaporate water as part of the process, which also cools the air.

0. **Clean surface.** Grass roots, thatch and leaves provide a good, clean surface to run and play on.

0. **Better appearance.** The visual appearance and smell of grass are pleasing to people.

0. **Fewer health risks.** Years of study have shown no risks to playing on natural turf when fertilizers and pesticides are properly applied. No such proof exists from long-term exposure to elements in artificial turf, such as crumb rubber infill.

**Benefits of natural grass sports fields:**

0. **Recycles.** Because grass has microorganisms, it is an excellent recycling center. Tree leaves, chewing gum, hard candy, peanut shells, vomit, urine, soda pop, spilled food, sports drinks, sunflower seed hulls, bird or animal manure, and bits of paper do not have to be picked up off a natural grass field, unlike on a artificial sports field, which saves on labor costs. Human diseases like MRSA that are transferred from a player to the grass are naturally disinfected. Grass fields do not need disinfecting.

0. **Self-repairs.** Natural grass fields repair themselves. All sports fields sustain wear and damage when used. Living natural grass fields have the ability to repair and regenerate themselves. Man-made surfaces do not repair themselves. Natural grass fields can last two to three times longer than artificial fields.

0. **Provides traction.** Grass gives good traction, but not great traction. Good traction means when players collide, the turf gives way, not human joints. Great traction is bad, because joints can break before a player's foot slides on artificial turf.

0. **Costs less to remove.** End-of-life disposal costs are a small fraction of what it costs to remove and dispose of artificial turf.
Please include as DEIR comment. Thanks.

Thanks,
Don Lewis
Environmental Planner
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103
ph: (415) 575-9095  fax: (415) 558-6409

----- Forwarded by Don Lewis/CTYPLN/SFGOV on 12/14/2011 02:13 PM -----
Has this report been already included in the DEIR?
(downward facing is better than out. Blue green better than yellow red. RPD
suggests to utilize these features plus a timer to turn off at 10 pm.
However, these measures only slightly mitigate negative impact to birds,
particularly migratory birds on the Pacific Flyway)

New Bird-Safe Building Design

The American Bird Conservancy (ABC) announced the availability of a new,
national publication, American Bird Conservancy's Bird-Friendly Building
Designs, part of a national-level program to reduce the massive and growing
number of bird deaths resulting from building collisions in the US. The
58-page publication contains over 110 photographs and 10 illustrations and
focuses on both the causes of collisions and the solutions, with a
comprehensive appendix on the biological science behind the issue. The
publication addresses building design, bird movements, and habitat and
landscaping, which can help or exacerbate the collision problem. Full
publication available in PDF format at:

Artificial light is increasingly recognized as a negative factor

for humans as well as wildlife.

Birds evolved complex, complementary systems for orientation
and vision long before humans developed artificial light. We
still have much more to learn, especially the differences between species,
but recent science has begun to clarify how artificial light poses a threat
to birds, especially nocturnal migrants. These birds use a magnetic
sense which is dependent on dim light from the blue-green end of the
spectrum.

Research has shown that different wavelengths cause different behaviors,
with yellow and red light preventing orientation. Different intensities of
light
also produce different reactions. Despite the complexity of this issue,
there is one
simple way to reduce mortality: turn lights off.

Rich and Longcore (2006) have gathered comprehensive reviews
of the impact of "ecological light pollution" on vertebrates, insects, and
even plants.

For birds especially, light can be a significant and deadly hazard.

Beacon Effect and Urban Glow

Light at night, especially during bad weather, creates con-
ditions that are particularly hazardous for night-migrating
birds. Typically flying at altitudes over 500 feet, migrants
often descend to lower altitudes during inclement weather,
where they may encounter artificial light from buildings.
Water vapor in very humid air, fog, or mist refracts light,
forming an illuminated halo around light sources.

There is clear evidence that birds are attracted to light, and
once close to the source, are unable to break away (Rich and
Longcore, 2006; Poot et al., 2008; Gauthreaux and Belser,
2006). How does this become a hazard to birds? When birds
encounter beams of light, especially in inclement weather,
they tend to circle in the illuminated zone, appearing dis-oriented and unwilling or unable to leave. This has been documented recently at the 9/11 Memorial in Lights, where lights must be turned off briefly when large numbers of birds become caught in the beams.

Significant mortality of migrating birds has been reported at oil platforms in the North Sea and the Gulf of Mexico. Van de Laar (2007) tested the impact on birds of lighting on an off-shore platform. When lights were switched on, birds were immediately attracted to the platform in significant numbers. Birds dispersed when lights were switched off.

Once trapped, birds may collide with structures or each other, or fall to the ground from exhaustion, where they are at risk from predators.

While mass mortalities at very tall illuminated structures (such as skyscrapers) during inclement weather have received the most attention, mortality has also been associated with ground-level lighting during clear weather.

Light color also plays a role, with blue and green light much safer than white or red light. Once birds land in lighted areas, they are at risk from colliding with nearby structures as they forage for food by day.

In addition to killing birds, overly-lit buildings waste electricity, and increase greenhouse gas emissions and air pollution levels. Poorly designed or improperly installed outdoor fixtures add over one billion dollars to electrical costs in the United States every year, according to the International Dark Skies Association. Recent studies estimate that over two thirds of the world's population can no longer see the Milky Way, just one of the nighttime wonders that connect people with nature. Together, the ecological, financial, and cultural impacts of excessive building lighting are compelling reasons to reduce and refine light usage.

Overly-lit buildings waste electricity and increase greenhouse gas emissions and air pollution levels, as well as posing a threat to birds.

Reducing exterior building and site lighting has proven effective at reducing mortality of night migrants. At the same time, these measures reduce building energy costs and decrease air and light pollution. Efficient design of lighting systems plus operational strategies to reduce light "trespass" or "spill light" from buildings while maximizing useful light are both important strategies. In addition, an increasing body of evidence shows that red lights and white light (which contains red wavelengths) particularly attract and confuse birds, while green and blue light have far less impact.

Light pollution is largely a result of inefficient exterior lighting, and improving lighting design usually produces savings greater than the cost of changes. For example, globe fixtures permit little control of light, which shines in all directions, resulting in a loss of as much as 50% of energy, as well as poor illumination. Cut-off shields can reduce lighting loss and permit use of lower powered bulbs.
Most “vanity lighting” is unnecessary. However, when it is used, building features should be highlighted using down-lighting rather than up-lighting. Where light is needed for safety and security, reducing the amount of light trespass outside of the needed areas can help by eliminating shadows. Spotlights and searchlights should not be used during bird migration.

Communities that have implemented programs to reduce light pollution have not found an increase in crime. Using automatic controls, including timers, photo-sensors, and infrared and motion detectors is far more effective than reliance on employees turning off lights. These devices generally pay for themselves in energy savings in less than a year. Workspace lighting should be installed where needed, rather than lighting large areas. In areas where indoor lights will be on at night, minimize perimeter lighting and/or draw shades after dark. Switching to daytime building cleaning is a simple way to reduce lighting while also reducing costs.

(Note pers.JR: spotlights, regardless of timers, should not be used, particularly on the Pacific Flyway)

Across the United States and Canada, “Lights Out” programs at the municipal and state level encourage building owners and occupants to turn out lights visible from outside during spring and fall migration. The first of these, Lights Out Chicago, was started in 1995, followed by Toronto in 1997. There are over twenty programs as of mid-2011. The programs themselves are diverse. Some are directed by environmental groups, others by government departments, and still others by partnerships of organizations. Participation in some, such as Houston’s, is voluntary. Minnesota mandates turning off lights in state-owned and -leased buildings, while Michigan’s governor proclaims Lights Out dates annually. Many jurisdictions have a monitoring component or work with local rehabilitators. Monitoring programs can provide important information in addition to quantifying collision levels and documenting solutions. Toronto, for example, determined that if short buildings emit more light, they can be more dangerous to birds than tall building emitting less light.

Ideally, Lights Out programs would be in effect year round, saving birds and energy costs and reducing emissions of greenhouse gases. ABC stands ready to help develop new programs and to support and expand existing programs. Shielded lights, such as those shown above, cut down on light pollution and are much safer for birds. Photo: Susan Harder .pdf

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The Planning Department will have reduced services available the last week of December 2011. In addition to the regular observed legal holiday on Monday, December 26, 2011, most Planning Department offices will be closed on December 27, 28, 29, & 30. On these dates, only the Planning Information Center (PIC), located on the 1st floor of 1660 Mission Street, will be open normal business hours as follows:

Tuesday, December 27, 2011: 8:00 AM to 5:00 PM
Wednesday, December 28, 2011: 8:00 AM to 5:00 PM
Thursday, December 29, 2011: 8:00 AM to 5:00 PM
Friday, December 30, 2011: 8:00 AM to 5:00 PM
Please note that the PIC will have reduced staffing on these days. The PIC phone number is (415) 558–6377. The Planning Department will resume full services on January 3, 2012.

========
Dear Mr. Lewis,

If a soccer stadium is desirable in San Francisco, a location must be found where a natural green environment does not exist, a location where 60 ft. tall stadium lights and greatly increased traffic would not diminish the enjoyment of the park and of ocean beach. San Francisco, being a city with very little environmentally needed green areas, it is shocking that there is a proposal to eliminate 7 acres of it's beautiful green and beneficial Golden Gate Park. I would appreciate receiving a copy of the report. Thank you.

Sincerely, Patricia Reid
Dear Mr. Wycko and Honorable Supervisors:

I am a resident of San Francisco, parent of a youth athlete, frequent user of Golden Gate Park and Ocean Beach and former San Francisco Little League parent coach, and I am writing to express my strong opposition to the proposal to cover the natural grass Beach Chalet Soccer Fields in Golden Gate Park with artificial turf and install stadium lighting. Rather, I believe if the proponents of this project really want to do what is best for the City, its residents, and the legacy of Golden Gate Park, the Beach Chalet Fields should be rehabilitated with real turf and no lights like the Polo Fields recently were, and the artificial turf project should be implemented at the West Sunset Playground fields.

I have read the DEIR and am astounded that the artificial turf project is even being realistically entertained given the fact that "The proposed project would have the following significant unavoidable impacts: The proposed project would cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5, including those resources listed in Article 10 or Article 11 of the San Francisco Planning Code."

Golden Gate Park is not just a local, but a national treasure. Millions of people visit it every day, residents and tourists alike. Millions of volunteer hours and millions of donor dollars have been spent in the efforts to renovate and maintain the nearby windmills to restore the historic beauty and quality of Golden Gate Park, and now proponents want to cover acres of nearby grass—just hundreds of yards away from the windmills on one side and Ocean Beach on the other—with artificial turf and stadium lighting? Absurd.

Environmentally, removal of 9 acres of natural grass will destroy necessary habitat to birds, butterflies and other wildlife, and no mitigation is proposed.
This boggles the mind in light of the ongoing efforts of the National Park Service to convert the Golden Gate National Recreation Area into a more protected National Park in which human and domestic animal use will be highly restricted in the adjacent Ocean Beach and Fort Funston areas. Installation of ten 60' towers with stadium lighting that will remain on until 10:00 pm every night is completely contrary with not only the historic and wild nature of the West End of Golden Gate Park, but of Ocean Beach and the GGNRA. Artificial lighting has been shown to draw birds off course during migration.

There is no recycling of the artificial turf plastic and tire crumb rubber, and in 8-10 years 400 tons of debris will go to the landfill. In addition, from what I can tell by going to Crocker Amazon, I would be surprised if highly used artificial turf fields get the 10 year lifespan described in the DEIR. The Crocker fields are already showing substantial wear, and during every soccer season my son’s shoes are filled with tire crumb bits after every soccer game or practice at Kimball and Crocker. We know fish and birds are dying from eating plastic pellet “nurdles” (http://www.sfgate.com/cgi-bin/article.cgi?f=/c/a/2011/10/29/MNF91LNMLB.DTL), why wouldn’t wildlife that lives or migrates through GG Park also knowingly or unwittingly consume tire crumbs, to their certain detriment?

It is much less expensive and more environmentally sustainable for the City to restore the natural grass fields, and those fields can be maintained beautifully as has been shown by the newly refurbished Polo Fields. One can’t play on them in the pouring rain or on a cold night, but is that such a bad thing?

In addition, I did not see anything in the DEIR about the relative impact on the park and surrounding neighborhood of thousands of additional people who will use the Beach Chalet soccer fields until 10 p.m. every night during times when the west end of the park or the Great Highway are closed for special events. Special events dramatically affect the west end of GG Park almost every weekend from May through October. A few events that cause virtually every road (and sometime foot access) to be closed in the west end of the park include music festivals Hardly Strictly Bluegrass and Outside Lands and road races and walks such as AIDS Walk, Nike Women’s Marathon, San Francisco Marathon and Bay to Breakers.

Project Alternative Number 2, renovating the West Sunset Fields with artificial turf, is a much better plan. There will be no adverse and significant negative historical impact. The neighborhood already has street lighting, and Saint Ignatius school is nearby which also has athletic lighting in place. In addition to SI, Sunset Elementary and Giannini Middle School are nearby and their students could benefit from the use of turf fields. The West Sunset playground has already been renovated, so the costs of creating the proposed adjacent play/recreation area would be unnecessary. While the long-term safety of tire crumb use is still debated, West Sunset Fields are not located in an environmentally sensitive area.

In addition, and importantly, the use of artificial turf fields at West Sunset rather than GG Park would involve not only the creation of more turf soccer fields, but also turf baseball fields. If you are unfamiliar with the rush on registration for SF Little League’s 2012 Spring season, suffice it to say that the demand is so great for baseball in San Francisco that all of the under-12 divisions were fully registered and closed within seven hours of registration opening. While I am not a proponent of playing through inclement weather (having just stood through my son’s soccer game at Crocker in the pouring rain and upper 40 degree temperatures myself a few weeks ago) I always feel it is unfortunate that after a Spring rainstorm, when the sun comes out and the kids are chomping at the bit to play baseball or soccer, fields can remain closed for 24 or more hours after the last drop has fallen because of standing water and field saturation.

West Sunset is less than 2 miles from the Beach Chalet, is not in an historically protected park, is not in an environmentally sensitive area, and would provide additional access not only to after-school and adult sports teams from all over San Francisco, but school kids from three immediately adjacent schools.
I urge you to reject the proposal to cover the Beach Chalet soccer fields with artificial turf and install stadium lighting, and to accept the alternative proposals that the Beach Chalet fields be rehabilitated with natural grass and artificial turf be installed at the West Sunset fields.

Thank you for consideration of this email.

Renee Richards
666 42nd Avenue
San Francisco, CA 94121
Environmental Review Officer:

Your EIR Report concerning the GG PARK Soccer Fields project is an inch thick and contains enough data, evidence, photos, and legal matter to dizzy us regular SF citizens, no matter how deeply interested we might be in the fate of our beloved Park.

So I wonder if you would consider trying the following experiment that might, just might, clear the air a bit? Please try to forget your position in the SF City Government for a few moments and approach the following questions simply as the rational grown-up I am sure you are. Or, at least try and imagine how other rational grown-ups who are not in the SF City Government might ask the following questions after reading your work:

1. How can killing more than eleven acres of open grassland and woods in a semi-wild setting with a plastic blanket and concrete, especially in an area directly in the flyway of thousands of migratory birds and used by them as a resting place be “less than significant” (IV.F-36) as regards wildlife? How can you be so supremely certain that if the 1500 watt halide lights aren’t pointing upward they won’t disorient birds? You quote “one controlled experiment” (IVF-28) research to justify this conclusion. Sorry, but in the science classes I attended, one experiment is only the beginning of research.
Also, an open field surrounded by trees is a “hot-spot” for wildlife. The open field invites grazing and pecking and burrowing, and the trees invite the predators who feed upon the others. The existing soccer field is “hot.” Ask anyone who has walked there at night and watched a Great Horned Owl drop from a branch to snatch a rodent off the ground. Or in the daylight watched a mass of migratory birds feeding off the insects and snails in the grasses. Would this work with plastic?

2. How can 6 or 10 60-foot 1500 watt spot-lights shining until 10 PM every night of the year in this critical bird area be seriously contemplated in a city whose own government initiated a Lights Out Policy that attracted praise from the Governor and Federal Congresspeople, and has inspired cities all over the world to emulate it?

3. Do the “light and glare” (IV.B-12) from cars and residences compare to that produced by 6 to 10 60-foot-high 1500 watt halide spotlights?

4. And speaking of those 60-foot-high spotlights (the average single-family house in San Francisco, by the way, is approximately 25 feet above the sidwalk), how can an examining body come to the conclusion the lights “would not have an adverse effect on a scenic vista, etc.” (IV.B-18) when there is no indication in your pages of anyone in the surrounding neighborhoods being asked their opinion of the
proposed lights, nor the proposed project in general. You call this an Environmental Impact Report, yet overlook the most vital segment of the environment there is in a city - the people who live there. The people who own property there.

5. And while we're on the subject of the people who live in the environs of the West End, did you canvass the neighborhoods to ask our fellow citizens how they feel about the vastly increased traffic that would surely flow down their streets to and from the proposed parking lots?

6. If we go by the sanguine prophecies of the renovation's proponents, those parking lots will never accommodate the vast hordes of soccer-players and their fans who would flock to the plastic-coated fields from all over the City and way beyond it. But they'll have to park somewhere. Surely not on the streets. A visit to the Outer Richmond and Sunset neighborhoods, especially at night, will present the Environmental Impact observer with a solid wall of the parked cars of residents. Here the rational civilian would ask. But that means the overflow cars from the lots will have to park along the Park roads, doesn’t it? And how will the public feel about that? Especially in the West End, that is supposed to give urban dwellers a whiff of the countryside when they need it (See the Master Plan IV,B-14)?
7. Now, that term "public" raises another question. The Report describes the way "the public" will be able to more safely recreate on artificial grass than on the real McCoy, and the way "the public" will be able to in fact, recreate until 10:00 PM every night of the year beneath those 60-foot-high floodlights. When you say "the public," do you mean baseball players? No. These fields would not be designed for baseball. You mean, basketball players? No. Same reason. Football? No. Track sports like broad-jumping? Pole-vaulting? No, again. How about picnicking? No. Not allowed, probably. And anyway, a little simple research turns up much evidence that plastic grass is uncomfortable to sit on, gets hot in the sun, is a breeding ground for bacteria (since there no bacteria-eaters present) and smells funny besides. So, asks the rational person, What segment of the public, besides soccer-players, a sliver of the general population, will be able to use the proposed synthetic fields? Then, further asks the rational person, Is there no moral problem with spending a ton of dough on a project on public land that will serve a small, exclusive percent of "the public?" Could it be more than one percent? It would seem that if you really want to engage "the public," you would get this Proposal into the next City-wide Referendum. Then you, and all of us, will really find out what the public thinks of Rec/Park's scheme.

Respectfully,
Dan Richman
November 28, 2011

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

Dear Mr. Wycko:  

I'm writing to ask you to OPPOSE two current proposals for the western end of Golden Gate Park;  

1. Renovation of Beach Chalet Soccer Fields with artificial turf and stadium lights  

2. Westside Recycled Water Treatment Plant  

As a resident of the Sunset District, I am a frequent user of Golden Gate Park and Ocean Beach. I am OPPOSED to the proposed changes would impact the local area and detract from everyone's enjoyment of our parkland.  

First and foremost: These projects are short term misuse of natural beauty of Golden Gate Park and San Francisco's general funds - we will be borrowing against our environment, land, property, and throwing good money (from the General funds and other resources) after bad, all of which belongs to future San Franciscans - See a link to the SPUR report below  

In addition:  

These projects will result in the loss of trees and other wildlife habitat, in increased traffic.  

The soccer project turns what should be a meadow available to all into a single-use area.  

This is not fair to everyone else out here who would like to use the park for hiking, picnicking, and enjoying nature.  

The lighting will detract from the beauty of Ocean Beach.  

The lighting will, because of the extreme bright lighting, most importantly, take away the night sky and our ability to see the stars at night.  

There must be more of a natural link between the park and the beach.
DIANE M. RIVERA – con’t.

The beach should not be marred with this very urban soccer complex proposal. The Water Treatment Plant is an enormous industrial building that does not belong in Golden Gate Park. It should be located elsewhere as the property will erode away over time and need to be moved just as we face the same problem at the end of Sloat Blvd at Ocean beach today.

San Francisco is becoming increasingly more dense. Golden Gate Park is a treasure for all SF residents, and it is ALL of OUR responsibility to preserve this precious open space for everyone’s enjoyment and for the enjoyment of future generations of San Franciscans.

Below find a link to the SPUR.org publication regarding OUR ocean beach:

http://spur.org/publications/library/article/future-ocean-beach

Here is an excerpt from SPUR’s findings:

"Planning for uncertainty on a dynamic coastline we know that sea levels are rising due to melting polar ice and thermal expansion of the oceans. The State of California projects sea-level rise of 16 inches by 2050 and 55 inches by 2100. The frequency and severity of storms are also likely to increase, and local policymakers have no choice but to adapt. Climate-change adaptation consists of policy and design responses to the negative effects of climate change that have already been "locked in," regardless of how we address carbon emissions going forward. Adaptation will be required in many arenas, from water supply to bio-diversity to extreme heat events, but few are as vivid and pressing as sea-level rise.

At Ocean Beach, this means that the sort of erosion episodes that took place in 1997 and 2010 will happen more frequently. As the shoreline recedes, critical wastewater infrastructure along Ocean Beach will face increasing pressure and will need to be protected, reconfigured or abandoned. Natural habitat and recreational amenities are threatened as well. Although we have a pretty clear picture of what will happen as sea levels rise, there is a great deal of uncertainty about its timing and extent.

Ocean Beach is the city's first real test in responding to the effects of climate change. The proximity of critical public infrastructure to the coast throws the challenges into high relief. Where should we hold the coastline? What is the economic value of a beach? A dune system? A threatened bird species? When and how will private property be exposed to coastal hazards?

There are also significant limitations in the available data about the effects of sea-level rise. Existing studies paint a general picture of likely impacts but do not account for local factors like coastal armoring and topography, which will shape coastal processes."
Thank you for your consideration.

"Unless someone like you cares... a whole, awful lot, nothing is going to get better. It's Not!"
-Dr. Seuss

respectfully submitted,

Diane Rivera
Native Sunset District Resident

CC: Board of Supervisors
    SF Ocean Edge

Subject Matter:

A project is proposed that will change forever the western edge of Golden Gate Park. It is the Beach Chalet artificial turf/60 foot stadium lights soccer complex.

⇒ No artificial turf at Beach Chalet playing fields in Golden Gate Park
⇒ No night sports lighting at Beach Chalet playing fields
⇒ Renovate the fields with real, living grass
⇒ Spend the rest of the money to fix up other parks and playing fields in San Francisco.

KIDS DESERVE REAL GRASS TO PLAY ON, and EVERYONE DESERVES A REAL PARK EXPERIENCE IN GOLDEN GATE PARK.

STOP THE DESTRUCTION OF PARKLAND AT BEACH CHALET FIELDS IN THE WESTERN END OF GOLDEN GATE PARK:

X 7 - acres of artificial turf is proposed to replace a grass playing field!
X 10 banks of 60 foot tall stadium lights will be lighted to 10:00 p.m. every night of the year!
X A $9 to $12 Million project that could be done for much less money!
X Loss of wildlife habitat in an area designated as the most wild and wooded in the Golden Gate Park Master Plan
Dear Bill,

I am writing in support of the Beach Chalet Field Renovation project. It is important for families with children to have access to all weather fields for team sports and the outdoor enjoyment of all. As a team parent for the San Francisco Riptide Lacrosse Club, I know first hand what it is like to have to notify a whole team when practices or games have to be cancelled at the last minute due to field closures caused by inclement weather. Having fields that can be used no matter the weather makes a huge difference in my ability as a mom to schedule my time and that of my son. Hundreds of families and children would benefit from these field upgrades.

Thank you for taking the time to consider my opinion.

Sincerely,
Rosemary Robinson
33 Ashbury Terrace
Mr. Bill Wycko, Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

December 9, 2011

Re. BEACH CHALET ATHLETIC FIELDS RENOVATION - Draft Environmental Impact Report

Dear Mr. Wycko,

The DEIR does not properly address the very serious issue of the increase in traffic that will result if the proposed renovation goes ahead. We are already at maximum load in that part of the Park during the soccer season. The site can not support more than the current set-up of 3 playing fields in use at any one time.

TABLE ES-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES: Impact TR-1 states, “The proposed project would not have a substantial significant operational impact on levels of service at local intersections.” This is obviously not correct just on the face of it. What is the basis for this assessment?

On a summer weekend, when the Park is most visited, there is already a heavy load of traffic from people going to Ocean Beach, the Beach Chalet and Park Chalet, The Queen Wilhelmina Tulip Garden and Windmill, Golden Gate Park Golf Course, the Archery Fields, and just visiting the western end of the Park. The increase in traffic that will occur if four fields are in use will result in noise, air pollution and congestion beyond the Park’s ability to absorb it.

I live within a quarter mile of the site and this is what I have personally witnessed:

- There is not enough parking for the Athletic Fields, as it is, when the three
fields currently available are all in use. The parking lot at the Athletic Fields can't accommodate all the vehicles and the overflow parks up both sides of JFK Drive and 47th Avenue in the Park, as well as the parking lots at Ocean Beach. An additional 20 parking spaces, as proposed, will not be sufficient to meet the demand for parking at the Athletic Fields if a fourth field is added and the hours of play extended to 10 pm every night.

- The parking lot for the Beach Chalet and Park Chalet is not large enough to meet the demand for parking at peak times. Customers who can't find parking in the restaurant lot park at the Ocean Beach parking lot or on JFK Drive. They will have to compete with the overflow from the vehicles that can't find parking at the Athletic Fields.
- There is not enough parking at the Golden Gate Park Golf Course to meet the demand on a weekend, and the parking overflows into the Park.
- The archery fields are very popular all year round. 47th Ave in the Park is already often parked up and can't accommodate the extra vehicles that are looking for parking during soccer matches.

If the RPD proposed renovation goes through there will be a massive traffic jam every weekend in front of the Queen Wilhelmina Tulip Garden and Windmill. What about the weddings that take place there? People pay the City to reserve the Tulip Garden for their ceremony, but there will be no parking for the guests.

The Park can not sustain or support the addition of a fourth playing field and extended hours of play. The quality of the Park experience will be diminished for both residents and visitors due to traffic congestion and lack of parking.

Recently, a lot of money was spent to provide ADA access to the walkway along the seawall at Ocean Beach. Ramps were installed adjacent to the staircases. If the parking lot at Ocean Beach is full it will limit access to the wheelchair ramps and limit access to Ocean Beach generally. The RPD proposed renovation of the Athletic Fields may be in conflict with the Ocean Beach Master Plan if access to parking at Ocean Beach is reduced. This needs to be evaluated more fully in the EIR.

The DEIR does not properly address the above concerns and dismisses them as not significant or substantial. They are significant and substantial. This needs to be rectified in the final Report. The DEIR should be an informational document; it reads more like a sales pitch by RPD.

I oppose the proposal to renovate the Beach Chalet Athletic Fields with artificial turf and stadium lights. I support the Compromise Alternative put forth by the public during the Planning Commission hearing of December 1st, 2011. The Compromise Alternative is to renovate the Beach Chalet fields with natural grass
and no lighting and to renovate the West Sunset Playground to provide more hours of play for youth soccer. I request that the Planning Department focus on this alternative and work to find a solution that protects Golden Gate Park's parkland.

Thank you for your consideration of the above. Please let me know that you have received this communication.

Sincerely yours,

David Romano
759 La Playa Street, #1
San Francisco CA 94121
415 221-5809
Dear Mr. Wycko:

I am writing to express my concern regarding the proposed artificial turf soccer stadium planned for the western edge of Golden Gate Park.

I disagree with the DRAFT EIR that states: (the project) "would not result in a substantial change in the character of the vicinity. Therefore, impacts related to land use were determined to be less than significant." On the contrary, this project poses numerous threats to the character of our neighborhood and the peace and tranquility associated with the Beach Chalet area, including the current grass soccer fields and nearby trails.

Of specific concern are 1) traffic congestion in the area; 2) controlling crowds; 3) use of the park after closed hours; 4) light pollution to residences in the area; and 5) impacts on wildlife.

You can count on me and my neighbors to be a the public hearing to voice our opposition to this project. For those of us privileged to call Golden Gate Park part of our neighborhood, we are grateful to the hard work and stewardship of Parks & Rec. However, on this particular project, we believe the negative impacts of this proposal far outweigh the benefits.

Thank You.

Mark Gelade
608 44th Avenue
San Francisco, CA 94121
LEIDA SCHOGGEN
897 NOE STREET
San Francisco, CA 94114

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

Dear Mr. Wycko,

I am opposed to the installation of artificial turf at the Chalet fields. In this time of global warming, the loss of species, the distancing of our children from nature, and significant budgetary problems it is irresponsible and heartless to replace natural grass with artificial turf.

While there are conflicting opinions about the financial burdens of artificial versus real turf, about the dangers to the users of the artificial turf, about the costs of installation and maintenance of artificial turf and other issues, there is no conflict about the value of real grass and trees to birds and other animals which populate our parks. There is so little green space in urban areas that can be used by animals and people that can serve to help keep global warming at bay that helps filter and absorb large amounts of water. It makes no sense to disturb a living part of the park to replace it with plastic.

I am also opposed to putting up banks of lights at the fields. Light pollution is a problem for all of us. To put these lights up in what is now a natural part of the park, destroying the natural rhythms of the day and night, beaming light onto a part of Ocean Beach at night is offensive. There are few places where one can escape the constant presence of artificial light in the city. I don’t think that one more of them should be destroyed by large banks of light.

Let there be more nature in the park, not less.

Sincerely,

Leida Schoggen
December 11, 2011

Mr. Bill Wycko
Mr. Don Lewis
Environmental Review Officers
Major Environmental Analysis Unit
San Francisco Planning Dept.
1650 Mission Street, Suite 400
San Francisco, CA 94103

Re: Beach Chalet Athletic Fields Draft Environmental Impact Report,
Cases No. 2010.0016E and State Clearinghouse No. 2011022005

Gentlemen:

I am writing to you as a concerned San Franciscan, Richmond District resident and PAR Board Member. In what little time I have been given to review the above-referenced draft Environmental Impact Report (DEIR), I have the following comments on the adequacy and accuracy of the document.

Request for Additional Time

1. Although additional time was denied for reviewing the DEIR at the Planning Commission hearing on December 1st, I believe that the public must be given more time to review this massive DEIR. The DEIR was published on October 26, 2011 giving the public only 45 days to review it. This is insufficient time to review a document of this size (369 pages) and complexity. There are many charts, including analysis that in some cases would take a chemist to understand their accuracy and efficacy. Also some of the charts are nonsensical. I take particular exception to the chart on Intersection Level of Service (LOS) Weekday PM Peak-Hour and Saturday Peak-Hour Existing, Existing Plus Project, and 2035 Cumulative Conditions on page IV-D-9 of the DEIR. CEQA states in section 15140 that:
The text of draft EIRs should normally be less than 150 pages and for proposals of unusual scope or complexity should normally be less than 300 pages.

CEQA further states in Section 15141:

EIRs shall be written in plain language and may use appropriate graphics so that decision makers and the public can rapidly understand the documents.

The DEIR is inadequate under both of these CEQA sections and fails to satisfy CEQA requirements regarding sufficient timing for public review and comment.

**Synthetic Turf**

2. The synthetic turf that is proposed for the soccer fields would have a planned life of only ten years (DEIR page ES-1). There is inadequate information provided on the potential environmental impacts the contaminants in that proposed turf may have on the quality of the water in the aquifer underneath it. The Task Force formed to investigate the synthetic turf concurred, encouraging further exploration.

3. Furthermore, the potential for pollutants from storm-water runoff should only increase the disuse of synthetic turf. Findings of iron, manganese, chromium, lead, zinc and other chemical components that are known carcinogens should in and of itself ask us why we would even consider using this material and how in good conscience we could or would allow our children to ever play on it. The DEIR is inadequate in this instance as it does not adhere to San Francisco Environmental Code Section 201, Goals which states:

The purpose of this Chapter is to reduce negative impacts to human health and the environment through the development of specifications for City purchases that:

1. Reduce occupational health hazards for City staff as well as reduce exposure of City residents and visitors to potentially toxic chemicals by purchasing products for use in City operations that do not harm human health or the environment;

2. Reduce San Francisco's contribution to global climate change by purchasing products that lead to a reduction in greenhouse gas emissions from Commodities;

3. Improve the air quality for San Francisco residents and visitors by purchasing vehicles and motorized equipment that minimize emissions of air pollutants;

4. Protect the quality of San Francisco's ground and surface waters by eliminating the use of chemicals known to contaminate local water resources through toxicity, bioaccumulation
or persistence; and

5. Preserve resources locally and globally through purchasing practices that include:

   (i) Maximizing water and energy efficiency and favoring renewable energy sources;

   (ii) Maximizing post consumer recycled content and readily recyclable or compostable materials;

   (iii) Favoring long-term use through product durability, repairability, and refuse; and

   (iv) Considering life cycle economics of a product that includes manufacture, transportation, use and disposal.

4. The DEIR is also deficient in that it does not sufficiently address hazards of synthetic turf to humans, most importantly, children. The main review cited by the DEIR is a 2008 report by the San Francisco Recreation and Park Department’s Task Force set up to review synthetic turf. Their data is flawed as it was taken by data written for the artificial turf industry. This is a conflict of interest. An independent, impartial experts must be hired to undertake a proper analysis of all health risks associated with artificial turf.

5. In addition, the Precautionary Principle states: “Based on the best available science, the Precautionary Principle requires the selection of the alternative that presents the least potential threat to human health and the City's natural systems...” Simply put, the Precautionary Principle means "Safety First." More precisely, it stands for the proposition that when an activity raises threats of harm to human health or the environment, precautionary measures should be taken even if some cause and effect relationships are not fully established scientifically. In this context the proponent of an activity, rather than the public, should bear the burden of proof.

6. The DEIR is deficient in that it has not reviewed the synthetic turf with the Precautionary Principle in mind. This must be considered. The hazardous impacts of the proposed project are clearly significant and cannot be mitigated. There is simply too much threat to human health and/or the environment. And, in accordance with the Precautionary Principle, when there is too much threat, it is best not to proceed. Tire crumb contains many compounds, including toxic metals, volatile organic carbons, phthalates, carbon black, allergens, and endocrine disrupters that are carcinogenic or otherwise
toxic. These toxins appear in water runoff, leachate and in the air. Rubber tire crumb gets attached to clothing, shoes, and skin and is tracked into homes.

7. Replacement of an 80,000 square foot field would produce approximately 400 tons of debris that would use up valuable landfill space and would result in considerable disposal costs (DEIR page IV.II-9). There are currently no standards for recycling of this synthetic turf material as verified with the California Environmental Protection Agency.

This is in complete contradiction to CCSF Ordinance 53-07 - Use of Recycled Materials as there is currently nothing that can be recycled from 400 tons of synthetic turf materials and it would need to use up precious landfill. San Francisco is known for being a green leader and many city leaders around the Country have looked to us for some of the innovative laws that we have passed -- such as the ban on plastic bags in the City. This has resulted in a 50% drop in plastic bag litter on the streets since the ban took effect. How can we go so far backwards? The DEIR must address this issue.

8. The DEIR has not addressed the dangers and serious injuries caused by synthetic turf vs. natural turf and this must be included. A study by a third party, unbiased team of qualified orthopedic surgeons, or the like is necessary to gain a complete understanding of the comparison. The study must also address the ACL injuries that are much more common on synthetic turf as compared to natural grass turf.

9. The General Plan of the City and County of San Francisco, Environmental Protection Policy 1.4 states: "Assure that all new development meets strict environmental quality standards and recognizes human needs. 1) In reviewing all proposed development for probable environmental impact, careful attention should be paid to upholding high environmental quality standards. Granted that growth provides new economic and social opportunities, uncontrolled growth can also seriously aggravate environmental deterioration. Development projects, therefore, should not disrupt natural or ecological balance, degrade the visual character of natural areas, or otherwise conflict with the objectives and policies of the General Plan."

The DEIR does not address this Environmental Protection Policy of the General Plan of the City and County of San Francisco.
Possible Other Uses

10. The permanent lighting that is being proposed, the stadium seating being installed and the other proposals to enhance the soccer fields implies but does not ensure that the only activities that would be permitted on those fields would be soccer and other related sporting events, since recent experience demonstrates the likelihood there may be other activities (e.g., concerts, etc.) with very different potential environmental impacts. Therefore, I believe it is necessary that the scope of the DEIR be expanded to include those distinctly different potential impacts and the alternatives that should be considered for them.

Traffic, Increased Playing Hours

11. The DEIR proposes to increase playing field hours by 9,582 hours per year for a total of 14,320 playing hours per year. This is a 200% increase per year over the current playing field hours. The DEIR’s study regarding the increased level of traffic to areas affected by the increased use in the park is insufficient. The DEIR now only provides an assumption given to them by the SFRPD for athletic fields similar to an athletic field EIR dated July 2010 and they provide a chart that indicates the increased level by cars that will be traveling into the Park that is unrealistic to believe. Although the project will increase the level of play by 200 percent this chart suggests that the traffic increase will be unchanged on many streets, decrease on others and only change by .1 percent on many (DEIR p. IV.D-9.) A proper study must be conducted that shows the increased number of cars that will be traveling into the Park. A comprehensive Transportation Demand Management Plan addressing these issues must be included in the DEIR before the project begins that is in plain language so that the public can quickly understand the document (CEQA Section 15140).

12. Not only does the increased traffic into the Park require further in-depth study, it is directly in conflict with the Master Plan of Golden Gate Park which states: Among the goals of the policies are the following: minimize the impact of motor vehicles on the park experience. (Golden Gate Park Master Plan, page 5-2).
13. The Master Plan of Golden Gate Park further states in Policy M - Traffic Generators (page 3-15):

Major traffic generators, within Golden Gate Park or adjacent to the park, preparing development or improvement plans or staging major activities shall be required to prepare a transportation analysis or environmental evaluation detailing possible transportation impacts to Golden Gate Park. Where appropriate, such development plans, improvement programs, or activities should provide a transportation management system that will prevent additional motor vehicle congestion, user conflicts, and all-day parking by non-recreational users within Golden Gate Park and encourage alternative modes of transportation. [Emphasis added.]

Habitat - Flora and Fauna and Endangered Species

14. The study and analysis in the DEIR regarding the habitat of the protected and non-protected birds, endangered species, other species, etc. that would be displaced because of the proposed project is inadequate. It is not productive to suggest that the birds, raptors and special-status bats protected under the California Fish and Game Code will move to another portion of the Park simply due to the fact that there are 200 similar acres of habitat for them. [DEIR page IV F-23.] It is also inconsistent with Objective 8 of the Master Plan of San Francisco.

Objective 8 of the Master Plan Flora and Fauna. Ensure the Protection of Plant and Animal Life states:

A totally manufactured environment without plants and animals would be sterile. That bit of nature, which still remains in San Francisco, is a precious asset. The ecological balance of wildlife and plant communities should be protected against further encroachments.

POLICY 8.1
Cooperate with and otherwise support the California Department of Fish and Game and its animal protection programs.

The California Department of Fish and Game has overall authority to protect animals in San Francisco. The Municipal Code reinforces this control in protecting animals in public areas. The City should foster greater public awareness of these laws.
POLICY 8.2
Protect the habitats of known plant and animal species that require a relatively natural environment.

Golden Gate Park, a product of years of planning and design, provides to a certain extent the natural environment needed by wildlife and plant communities. The natural areas of Golden Gate Park should remain as they are, and any move to convert them into areas for more active recreation should be discouraged.

Other parks and undeveloped areas in San Francisco remain relatively undisturbed and provide a variety of environments for flora and fauna: beaches, sand dunes, wooded areas, open fields, grassy hills, and lakes. All these areas should be protected. The Presidio, not subject to local jurisdiction, should, nevertheless, be urged to protect animal and plant habitats within its boundaries.

POLICY 8.3
Protect rare and endangered species.

A number of native plant and animal species are designated as rare or endangered. Interested individuals and groups, together with knowledgeable public agencies such as the Recreation and Park Department and the California Academy of Sciences.

15. This is also contrary to the Master Plan of Golden Gate Park which states in Policy C, Wildlife and Habitat at page 3-10 and 11 that:

Golden Gate Park provides important habitat for wildlife within San Francisco. Habitat values should be preserved and enhanced throughout the park. Designate and manage areas or zones within the park that are identified as having high natural resource values.

1. Manage, protect, and enhance the park's landscape for wildlife habitat and other natural values. Managing the landscape for these values should include preserving and enhancing food sources, nesting sites, and roosting sites thinning and providing openings in the forest canopy, and maintaining understory vegetation....

3. Preserve selected dead and aging trees for habitat value....
5. Designate areas within the park that have special resources or habitat values as natural resource areas. Natural resource areas should be managed to preserve and enhance the natural resource values. Control park uses in and near natural resource areas to preserve natural values.

16. The project is located within the Pacific Flyway and in close proximity to the Pacific Ocean and shoreline. The DEIR admits that the migratory corridors in the vicinity of the Beach Chalet Athletic Fields are unknown. It is however, known that nighttime lighting has the potential to interfere with migratory corridors and can impede the use of wildlife nursery sites. Increase in ambient noise levels are problematic as it can interfere with avian reproduction as well as deter the use by special-status bats. [DEIR Pages IV.F-26, 27.] As the Beach Chalet Soccer Fields are located within an Urban Bird Refuge as defined by the City’s Bird-Safe Guidelines, further study is warranted.

Alternative Locations

17. The Selected CEQA Alternatives were not adequately investigated and should be further explored. Alternative 2, the West Sunset Playground, was summarily dismissed although it meets most if not all the goals of the project and it would provide a safe, optimal recreational facility and amenities for athletes, spectators, park users, and result in facility compliance with current ADA requirements. Additionally, the playground is not considered a potential historic resource. However, under no circumstances should synthetic turf be used at this location or any location. The failing objections are minimal and pie in the sky requirements such as increasing the size of the parking lot. CEQA Code Section 15125.6 clearly states:

(b) Purpose. Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. [Emphasis added.]
18. Additions of the synthetic turf, the 100 foot stadium lighting and the stadium seating collectively result in an irreversible impact under CEQA and the Beach Chalet Athletic Fields would no longer be a contributor to the Golden Gate Park National Historic District. The DEIR considers this to be an acceptable loss of 10.9 acres of our 1,017 acres of parkland. No contributor to the whole of the Golden Gate National Historic District should ever be removed from the resources of the District. Traveling down this road is very dangerous and should be avoided at all costs. (DEIR p. IV C-28, Exemption from Environmental Review p. 2).

Finally, I would like to receive a hard copy any and all future material that is produced regarding this matter.

Thank you for your consideration.

Sincerely,

Cheryl Schultz

"The value of a park consists of its being a park, and not a catch-all for almost anything which misguided people may wish upon it."

William Hammond Hall

Encyclopedia of San Francisco, Golden Gate Park

cc: John Rahaim
The proposals to install lights and artificial grass at the Beach Chalet Soccer fields violates your master plan. It is a horrible president to install artificial grass and it takes away important habitat for animals. This is a thoroughly bad idea. As a user if GGP I urge you strongly to reconsider this faulty idea that violates the long standing spirit of GGP and denigrates the park's standards. Thanks for listening and considering.

Richard Schwartz

--

Richard Schwartz
From: Diana Scott <dmscott01@yahoo.com>
To: bill.wycko@sfgov.org
cc: don.lewis@sfgov.org, Carmen Chu <carmen.chu@sfgov.org>

Date: Monday, December 12, 2011 07:13PM
Subject: Re: BEACH CHALET ATHLETIC FIELDS RENOVATION Draft Environmental Impact Report, Planning Department Case No. 2010.0016E State Clearinghouse No. 2011022005

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

Dear Mr. Wycko:

I have been sick, and not able to contact you more timely on the DEIR for the Beach Chalet Athletic Fields Renovation, yet want to express my support for the Compromise Alternative put forth at the Planning Commission hearing Dec. 1.

This solution minimizes negative environmental impacts -- including toxic run-off, and disturbance of wild-life as well as neighbors residing near the park, saves energy, and keeps Golden Gate Park close to its mission of serving as a natural urban refuge.

Additionally, dedicated use of parkland for one segment of the population -- athletic teams -- is unnecessarily exclusive of other non-athletic uses and constituents; the Compromise Alternative sets up a more inclusive balance among these.

Whether or not part of the official record, I hope you give due consideration to these concerns which I share with many other neighborhood residents.

Sincerely,

Diana Scott, resident
Outer Sunset
----- Forwarded Message -----  
From: SF Active <gsherman@sactive.org>  
To: qwrt4@sbcglobal.net  
Sent: Thur, November 18, 2011 7:36:38 PM  
Subject: Fw: Is The City Fields Foundation Trying To "Get Away With Murder"?

dateline Thursday November 17th, 2011

Is the City Fields Foundation trying to get away with murder?, asked District 1 resident Janet Broward.

On Wednesday the San Francisco Historic Preservation Commission met to discuss the Beach Chalet Athletic Field conversion which entails replacing the Golden Gate Park grass playfields with 9 acres of synthetic turf. About the quarter of million pulverized tires will be scattered, said speaker Kiley Watts. The chemicals and metals from the tires’ carbon black particles and dust can enter and compromise the human body in a variety of toxic ways.

But such sentiments were quickly drowned out by a parade of City Field Foundation supporters who had created an overflow at the proceedings. It turns out that the Playfields Initiative lobbyists had done an email blast that arranged for transportation and presentation coaching to anyone who would show up and support their cause at the meeting.

After the Planning Department’s Don Lewis gave an introduction, the Commission limited the public comment to one minute per person, due to the overflow. This is the kind of tactic that the City Fields lobbyists have been using for years, said Mark Albright, a political observer. (Before a recent mayoral debate, Playfields Initiative representatives bought dinner for anybody who showed up and signed their petition). A one minute limit prevents any thoughtful or technical discourse. Also by coaching others in advance, the lobbyists don’t have to speak on the record and give false information, noted Albright.
The coaching was in evidence by the repeated invoking by the City Field Foundation supporters and league representatives that, artificial fields were safer than grass, that the City Fields Playfields Initiative was creating more playfields, mixed in with emotional anecdotes of gopher holes. "All lies," said Janet Broward. "I used to be a City Fields supporter. The facts are that artificial fields are not safer at all. Study after study has shown that. And no matter what they say, City Fields Foundation does not want to create more playfields. They are in the business of turning existing city playfields into artificial sports complexes. And don't get me started on how easy gophers are to keep out."

The City Fields Foundation, Playfields Initiative is the brain child of billionaires John, Robert, and William Fisher. According to an agreement with the City their corporation, Pisces, Inc., gets to choose who gets awarded millions of dollars in construction contracts, (i.e. Musco lighting, FieldTurf synthetic fields), while the city of San Francisco provides them with free land.

In attendance at the Commission Meeting was City Field's team of high-powered lobbyists; Alex Clemens (political insider and founder of Barbary Coast Consulting), Susan Hirsch, (City Fields Foundation director and founder of Susan Hirsch Associates), Patrick Hannan (City Fields Foundation director of communications), Allie Herson (Barbary Coast Consulting), along with Dawn Kamalanathan, (Rec and Parks Beach Chalet EIR project sponsor).

A San Francisco RPD employee who wished to remain anonymous speculated that, "This, (the Beach Chalet Field conversion) may not be their end all goal at all. While everyone is being distracted by the Beach Chalet EIR, the Rec and Parks Commission has green lit two other projects.. (The Mission Playground in the Mission District and the Minnie and Lovie Playfield, a $7 million / 10 acre project in the Oceanview neighborhood). And depending on how the Planning Departments' EIR is written it could be smooth sailing for them going forward on their other projects., (including the 9 acre West Sunset grass Playfield in the Sunset which is listed in the Draft Beach Chalet EIR as an alternative).

Mr. Albright took note that, "What was unusual about the Historic Preservation Commission members was their seeming unwillingness to be bullied. Despite the fact that some of the commissioners had met with lobbyists before the meeting there was a noticeable lack of the usual kowtowing I have seen with other commissions.. John Fisher, (City Fields Foundation Trustee and President of Pisces Inc.), was not reachable for comment."
We may see the Dream Team in action again soon. On December 1st the San Francisco Planning Commission will be hearing the issue.

contributing correspondent Gail Sherman
Environmental Review Officer
Mr. Wycko
S.F. Planning Department
1650 Mission St. Ste.400
San Francisco, CA 94103

Re: Beach Chalet Athletic Field Renovation

I am totally opposed to this, as are so many other residents of San Francisco, for all of the reasons you have heard. I am in agreement with all of the reasons Jason Jungreis outlined in his letter to you.

Please consider the Compromise Alternative.

If this project goes forward with artificial turf, etc., I sincerely believe that it is all about money, unfortunately.

Sincerely,

Mary Lynn Shimek
562 48th Avenue
San Francisco, CA 94121-2427

Mary Lynn Shimek
November 16, 2011

City and County of San Francisco
Historic Preservation Commission
San Francisco Planning Department

Subject: Beach Chalet Athletic Fields Renovation - SUPPORT
Re: Draft Environmental Impact Report - October 2011
Planning Department Case No. 2010.0016E
State Clearinghouse No. 2011022005

To Whom it may concern:

I am writing in support of the installation of artificial turf athletic fields and field lights at Beach Chalet in Golden Gate Park in San Francisco, CA.

I see no rational basis whatever to deny the children and adults of San Francisco the increased recreational opportunities that a new complex of electrically lighted artificial turf fields at Beach Chalet will provide.

The Environmental Impact Report fails to mention that not building the subject artificial sports field complex will result in more children who do not participate in organized athletics which will cause more crime, more health problems and shorter life spans in the general population.

The Mission Youth Soccer League was founded because an entire street gang tried to beat me to death with baseball bats in front of my home in the Mission District back in 1991.

Due to the efforts of thousands of volunteers and with the assistance and cooperation of the San Francisco Recreation and Parks Department, there are about 3,000 more children participating in organized sports in San Francisco today than there were 20 years ago. About 1,400 of those children live in the Mission District. For many of these children, soccer is their only alternative to a life of crime.

For disadvantaged youth, a soccer team is sort of like a legal street gang. Soccer team membership provides many Mission District youth with a support system that emphasizes clean living, team work the value of education* while shielding them from the attraction of street gang membership.

*(Passing grades in school are a prerequisite for participation.)

Increasing the number of sports fields in San Francisco is critical to the health of the community.

Yours truly,

Andrew Solow
Hello Mr. Wycko and Mr. Lewis,

Can one of you guys please confirm receipt?
Also, can one of you give me a call regarding my question about light pole height? See end of forwarded message.

Thanks, Andy Solow - Cell 415-722-3047

From: Andrew Solow (Earthlink) [mailto:alsolow@earthlink.net]
Sent: Thursday, December 01, 2011 10:56 PM
To: 'bill.wycko@sfgov.org'; 'don.lewis@sfgov.org'; 'c_olague@yahoo.com'; 'rm@well.com';
'wordweaver21@aol.com'; 'plangsf@gmail.com'; 'mooreurban@aol.com'; 'hs.commish@yahoo.com';
'rodney@waxmuseum.com'
Cc: 'Linda.Avery@sfgov.org'; 'Patrick Hannan'; 'Phil Ginsburg'; 'Mark Bethel'; 'Cary Jones'; Chris Duderstadt (cdmd@sfpix.com)
Subject: BEACH CHALET ATHLETIC FIELDS RENOVATION - Draft EIR SUPPORT!!! Item 15. 2010.0016E December 1, 2011

SAN FRANCISCO PLANNING COMMISSION
Commission Chambers - Room 400
City Hall, 1 Dr. Carlton B. Goodlett Place

President: Christina R. Olague
Vice-President: Ron Miguel
Commissioners: Michael J. Antonini; Gwyneth Borden;
Rodney Fong; Kathrin Moore; Hisashi Sugaya

Commission Secretary: Linda D. Avery

Staff: Don Lewis (415) 575-9095
don.lewis@sfgov.org
Bill Wyko (415) 575-9048
bill.wycko@sfgov.org
Subject: Item 15. 2010.0016E
Re: SUPPORT

Honorable Commissioners and Staff,

I am writing in support of the draft EIR for the proposed Beach Chalet Athletic Fields Renovation and in support of the proposed field renovation itself.

I believe that the proposed Beach Chalet renovation and project alternatives are thoroughly analyzed in the DEIR.
I support the plan to renovate the Beach Chalet Athletic Fields by replacement of natural grass with leach field drainage, artificial turf and field lights. And, I ask that you move this excellent project forward without delay.

As noted by one of the Planning Commissioners at this evening's meeting, the Beach Chalet Soccer Fields have been present at the western end of Golden Gate Park for about 75 years. Further, the Golden Gate Park Master Plan specifically describes the Beach Chalet fields as "Soccer Fields" and includes provisions for improving and expanding those fields to provide additional recreational opportunities for the residents of San Francisco.

I also utterly reject the NIMBY alternative of building the Beach Chalet Soccer Field complex in another location.
If there is another location in San Francisco where a soccer field complex could be built, we need to build a soccer complex at that location IN ADDITION to renovating Beach Chalet with artificial turf and field lights, NOT instead.

As you are all aware, Golden Gate Park is man-made, not natural. If we really want to make Golden Gate Park a "natural area", we should turn off all irrigation, let all of the trees and shrubs die, and let sand dunes reclaim the entire park.

I have personally visited Beach Chalet hundreds of times since I moved to San Francisco in 1983. And, the Beach Chalet fields have always been in extremely poor and dangerous condition. The Beach Chalet soccer fields were built on top of a sandy swamp that doesn't drain. It's been a lake or a mud bog four months out of every year since it was built.
Even with the addition of a leach field drainage system, because of the shortage of athletic fields in San Francisco, there is no natural grass that I am aware of that can possibly survive the amount of use that the Beach Chalet Athletic Fields get, even without field lights.

The proposed undertaking is to build new Beach Chalet fields that can provide increased playing time, not more natural grass fields full of gofer holes, pot holes and ruts that are impossible to maintain unless they are fenced and closed 4 months a year. {FYI: It's hard to kill gofers without poison or lethal traps.}

The only question I have about the proposed Beach Chalet Renovation project is exactly how tall the field light poles have to be to properly illuminate the new artificial field complex. Shorter would be better if an adequate amount of illumination can still be achieved.

If they have not already done so, I request that the City Fields Foundation provide technical comparison of the efficiency (and cost) of 60', 45' and 32' light poles to light Beach Chalet including the proposed locations for the different height light poles, the type of light fixtures to be used on the different size light poles, and some estimate of the amount of spill over and reflected light for the different height light poles and fixtures (light pole heights are approximate). Again, if it has not already been done, perhaps a field lighting contractor could provide the requested lighting comparison.

At the recent HPC meeting regarding the Beach Chalet Field Renovation project, one of the speakers alleged that an artificial soccer complex with field lights was recently constructed in an avian flyway somewhere in Marin County with 32' light poles. Has anyone verified the veracity of this rumor yet???

Yours truly,

Andrew Solow
Past President and Co-Founder
Mission Youth Soccer League, Inc. (MYSL)
San Francisco, CA  94131
Cell 415-722-3047
Hello Mr. Wycko,

My name is Christopher Soulard. I own and occupy a home in the Outer Sunset District. My brother and I frequent Golden Gate Park and enjoy the natural landscaping that the park employs. I enjoy the quiet that the Outer Sunset provides, a refuge of sorts from the hustle of downtown. I particularly enjoy the windmills near the edge of the park: I actually proposed to my wife there. I am writing to oppose the construction of a sports complex at the edge of Golden Gate park in this vicinity because a sports complex in this location does not fit into the aesthetic of this area. I see a clear disconnect when comparing what is there now versus what will be constructed: lush, varied vegetation versus homogeneous turf, windmills versus flood lights. San Francisco has a history of being unique, this eye-sore screams cookie cutter. Please reconsider your proposal and place the complex somewhere else in the urban jungle rather than within one of the few peaceful sanctuaries in the city limits.

Thank you,
Christopher Soulard

--

Chris Soulard
chris.soulard@gmail.com
Dear Bill,

My son, Kyle Splittgerber, plays in a soccer league that uses the Crocker Soccer Fields. Many of his fellow soccer players and other citizens of San Francisco have voiced objections to the proposed rubber crumb infill system proposed for the Beach Chalet project. Please view the attached photo.

A new artificial turf system has recently been introduced by A-Turf (www.aturf.com). The Titan SS system is the only system designed specifically for sand infill. Using Envirofill, (www.usgreentech.com), a round silica coated with rubber and Microban, the sand infill can be recycled into the artificial turf. The Titan SS turf carries an industry leading 12 year warranty. The Envirofill is guaranteed for 16 years. The disadvantages of migration, smell, heat, high maintenance, limited warranty and the need to dispose are eliminated.

As a soccer coach for 25 years, I have seen soccer teams play on a wide variety of surfaces. I believe that including the A-Turf system in the Environmental Review would add the most advanced and environmentally sound alternative available.

Sincerely,

Buzz Splittgerber  
Fly Out.jpg
Rubber Crumb Migration ("Fly-Out")
Mr. Bill Wycko  
Environmental Review Officer  
San Fransisco Planning Department  
1650 Mission Street, Suite 400  
San Fransisco, CA 94103  

Subject: Expert comments on the Draft Environmental Impact Report for the Beach Chalet Athletic fields renovation  

Dear Mr Bill Wycko,  

With this letter I present you my professional expert view on the Draft Environmental Report for the Beach Chalet Athletic fields for which I have been retained by Katherine Howard, a member of the Steering Committee for SF Ocean Edge.  

As a professional light pollution expert in the Netherlands I regularly review and draft “lighting sections” in Environmental Impact Assessments for new planned industrial areas and greenhouses. Based on this expertise I wrote comments on the description of the lighting plan and the impact analysis in the Draft Environmental Impact Report for the Beach Chalet Athletic fields renovation.  

In the attachment you will find these comments, together with my professional resume to show my expertise in this field.  

I express my trust that you will take these comments into consideration and I am always prepared to answer any question you still may have.  

Yours sincerely,  

Henk Spoelstra  
Lumineux Consult  

---  

1 SF Ocean Edge. Address 1243 42nd Avenue, San Francisco, CA 94122. www.sfoceanedge.org
INTRODUCTION

The comments in this document focus on the planned lighting plan and the analysis of the night time impact of this lighting from the sport field as described in the Draft Environmental Report for the Beach Chalet Athletic Fields Renovation (October 2011).

First a general view and comments on the elaboration of these aspects in the DEIR are given. Then reasoning and recommendation are given how to improve the light impact analysis for the DEIR. In a final section specific comments are given on a number of relevant statements in the DEIR.

GENERAL COMMENTS ON THE LIGHTING IMPACT ANALYSIS IN THE DEIR

LACK OF LIGHTING PLAN CALCULATION

One of the striking aspects in the DEIR is that there is no lighting plan calculation at all of the illumination on the sport field, the parking lot and walkways. Only some numerical values are given in the text and some reference to the Crocker Amazon site for the types of lights to be used.

For a proper evaluation of the lighting plan in the DEIR the results of these calculations should have been presented as an absolute minimum, with the planned number and type of fixtures. Without this it is impossible to judge if the proper illuminances are applied during operation. Also the extent of illuminated area's on and around the sport field (including the walkways and parking lot) cannot be judged in a sensible way.

INSUFFICIENT LIGHTING IMPACT ANALYSIS

The impact of lighting onto the surroundings, such as light nuisance, sky glow and indirect illuminances due to the back scattered light from the atmosphere is only described qualitatively and not quantitatively.

The fact that the lighting impact under cloud cover conditions and fog is about 10 to 20 times more severe than during clear sky conditions has been heavily neglected in the DEIR.

The DEIR lacks any estimate or calculation of the increased overhead night sky brightness and sky glow above the horizon at some distance(s) during cloud cover and fog conditions.
Due to this it's impossible to judge the impact on the surroundings and the expected sky brightness and sky glow in a objective way.

**MARGINAL PHOTOGRAPHIC REPRESENTATION**

Although some attempts have been made to give a representation of the night time view of the illuminated sport field in the DEIR, these kind of representations can be misleading.

It takes great effort to match the proper and true brightness of the planned illuminated sport field into an existing photo. The Crocker Amazon Playing Field has been inserted into the photo (on page IV.B-32). However the DEIR states that the Beach Chalet Athletic Sport Field has 32% brighter lights. Therefore it is doubtful that this aspect has been properly corrected for. Also, EIR asserts that the Beach Chalet Athletic Sport Field will be equipped with fully shielded fixtures. This is questionable since the lights of each individual lamppost are visible in the photo, which is taken well above the plane of the sport field.

In general matching photo's in Adobe Photoshop is insufficient without the proper scaling of the known luminances of the objects and in the original photo's. The DEIR is inconclusive on this aspect.

**NECESSARY LIGHTING PLAN CALCULATIONS AND LIGHTING IMPACT ANALYSIS**

For a proper assessment of the applied and quantified illuminances at the sport field and the expected light impact on the surroundings in a quantitative way the following two subjects should be elaborated and quantified in far more detail in the DEIR:

1. Lighting plan calculation
2. Lighting impact analysis

The next two sections describe the requirements that these two subjects must meet.

**1. REQUIREMENTS LIGHTING PLAN CALCULATION**

The lighting plan calculation should cover:

- the illuminance (foot-candles) of the sport field, the parking lot and the walkways and the area's just outside the sport field, parking lot and walkways (e.g. by presenting foot-candle contours)
- the light nuisance at various points around the sport field (e.g. at the residential areas, in the easterly park direction, at the beach and so on) by calculation of:
  o brightness (candela) from the fixtures
  o vertical illuminances

These calculations should be done with the proper photometric and geometric data (including the shielding and pointing direction of the sport field fixtures) together with the exact number of fixtures to be installed. This includes the fixtures at the walkways and parking lot (and if applicable any other lighting at or around the sport field buildings).

In order to put the light nuisance into perspective and for comparison the brightness (candela) and vertical illuminances should be compared within common brightness levels/illuminances of e.g. certain familiar lamps at a certain distance, the sun, the moon or even a candle.

2. REQUIREMENTS LIGHTING IMPACT ANALYSIS

The lighting impact analysis should be based on the calculation of the scattering of light originating from the sport field and that is reflected back by the atmosphere. This gives rise to sky glow and illuminates the surroundings further away from the sport field. Especially under fog conditions the illumination levels rise substantially.

The lighting impact analysis should be performed with an appropriate light pollution model, which takes into account scattering of gas molecules (Rayleigh scattering), water droplets and aerosols (Mie scattering) at the maximum eye visibility wavelength of 555 nm.

The lighting impact analysis should present sky brightness values for an observer at certain preselected critical points and looking towards the sport field (e.g. from a point at the beach, residential areas and at a point in easterly direction of the park). The sky brightness values should be calculated for different viewing angles above the horizon.

The illumination levels in the park well outside the sport field, which could influence nocturnal animals and can be of nuisance in the residential areas facing the park should be calculated at some distances from the sport field. Ideally a contour plot for an area within 250 m around the sport field would be included in the final EIR.

Also these results should be placed in perspective to compare them with appropriate “reference values” for sky brightness and with moonlight illuminances levels (e.g. half and full moon).
For these calculations the following data is needed:
- all input data used in the lighting plan (under 1):
- the position, geometric and photometric data of all fixtures
- the reflectivity of the ground surface at and around the sport field (grass, artificial turf, parking lot, walkways)
- a choice for which meteorological conditions the calculations should be performed. My recommendation is to perform modeling for an “average” fog condition, during low cloud cover and clear sky. For this the following meteorological parameters are needed (most can be probably obtained through the MET-office at the San Fransisco International Airport):
  - visibility during fog conditions
  - average cloud base during non-fog conditions
  - annual frequency of cloud cover

COMMENTS ON THE VARIOUS STATEMENTS IN THE DEIR

In this section comments are given on selected and relevant statements in the DEIR. First the statement is quoted and then the comment given.

Brightness

EIR page IVb-34:

Owing to the differences in height between the light poles at the Crocker Amazon (80 feet above ground level) and the proposed light poles at Beach Chalet (60 feet above ground level), spots on the Beach Chalet fields would be approximately 32 percent brighter than their corresponding areas on Crocker Amazon. However, at the lower height, the Beach Chalet lighting would likely be obscured by nearby trees or buildings.

Comment: This is a questionable statement. Only with a proper lighting calculation plan this can be quantified if the lights will be obscured or not.

Here two aspects are involved. One is the view of the lamps themselves (although they are capped, you can see the lamps from certain points). The second is the view of the playing field. This is only partly shielded by trees and buildings (only the edges), depending on the viewing point. The proposed view in Figure IV.B-10 on page IV.B-32 indicates that the playing field will be seen at certain angles. The image also indicates that direct light from the fixtures will been seen as the viewing angle is downwards. If this is really the case then the fixtures will emit light above the horizontal and thus contribute to the sky glow. This also can cause light nuisance for the residential areas around the sport field.

Another point in the statement is that the light poles are lower and the lights “would be approximately 32 percent brighter”. In principle then the amount of light on the
sport field is 32% too high. With a proper light calculation plan this can be calculated more precisely and probably reducing the amount of lamps.

View under foggy conditions

EIR IV.B-34: Based on the evening views comparative photographic study conducted for the proposed project, it appears that, although the project site would likely appear substantially brighter as compared with existing conditions or other illuminated areas in the vicinity, the proposed lighting is unlikely to spill over the site’s boundaries substantially enough to adversely affect the surrounding neighborhoods. Also, the spillover would not affect the amount of light of the night sky, as the sky appears similar above the athletic field lights as above other areas with no athletic field lights. Specifically, under foggy conditions, the lighting would be more diffused and would likely be more visible higher up in the sky and from vantage points further away. Other existing light sources, such as street lighting and residential and commercial building lighting, also result in light diffusion and this project would contribute to the existing general “glow” that can occur during foggy conditions.

Comment: These are questionable and qualitative statements. During foggy conditions the whole sporting field will be like a glowing bright cloud and the surroundings will be brightly lit up to a factor 10 to 20 times brighter than under clear sky conditions.

During cloudy conditions the clouds over the sport field will be very bright and shed the reflected light back to the surroundings. The sky will be 10 to 20 times brighter than under clear sky conditions.

So during a number of these occasions the proposed lighting is likely to spill over the site’s boundaries substantially enough and will affect the surrounding neighborhood (so complete opposite of the statement in the EIR).

Lighting plan - Times of lighting

EIR page II-15: All lighting would be controlled by an online automated control system, which would turn lights on at sunset and turn all the lights off upon field closure at 10:00 p.m. daily. In addition to the field light standards, the project includes 47 approximately 15-foot-tall pedestrian pathway light standards and 13 approximately 18-foot-tall parking lot light standards. These also would be controlled by an online automated control system.

EIR IVB-30: All lighting would be controlled by an online automated control system, which would turn off all the lights at 10:00 p.m. in addition to the field light standards, the project
includes 47 approximately 15-foot-tall pedestrian pathway light standards and 13 approximately 18-foot-tall parking lot light standards, which would also be controlled by an online automated control system.

IV.B-36: After facility closure at 10 p.m., most of the lights would be turned off, with parking lot, pathway and security lighting left on for a short period of time after 10 p.m. to allow for safe exit of site users. However, no lights would be left on overnight. Therefore, no spillover of artificial lighting would occur, and this impact would be less than significant.

Comments: There is some ambiguity in these statements and it seems not to be mandatory. How long after 10 p.m. will be the walkway and parking lot lighting be switched off? Experience at sport fields show that lights are often left on with no one on the field. This causes energy waste and unnecessary light pollution and should be avoided. A more strict regulation to switch off the lights as soon as people have left the field is recommended here.

Lighting plan – Error in the DEIR

EIR page IVb-33:

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

Comments: This is an obvious error in the EIR. A lamp that emits 134 lumens equals a light bulb of about 10 Watt. There will be 1500 Watt lamps installed. This value should be 134 klumens (134000 lumens) to be correct.

Lighting plan – Spill over

EIR page IV.B-36:

Factors that affect the impact of lighting are numerous and include the brightness of surrounding lighting, such as residential lights and moonlight, and the “bounce” of the field lights off the surrounding structures, the ground, and particles of water in the air (i.e., fog). Thus, the impact of additional artificial lighting on light spillover can depend on such things as the reflectivity and wetness of the synthetic turf, fog conditions, and the phase of the moon. (1) However, even under conservative conditions, the spillover of the lighting would not be expected to travel so far as to adversely and substantially affect the closest neighborhoods, which are located approximately 800 feet from the project site. The distance from the project site and the site’s screening by the surrounding vegetation (2) would virtually eliminate any spillover lighting that
could otherwise enter people's homes. Although only evening (dusk) conditions are illustrated in the visual simulations, this determination would also hold true for nighttime conditions, which, for the purposes of the proposed project, are the hours between total sundown and facility closure. A lighting study prepared for the proposed project by Musco Lighting\textsuperscript{7} illustrates that within a very short distance of the project site's boundaries (approximately 150 feet), (3) light measurements at heights of approximately 60, 70, 80, 90, and 100 feet above ground level would drop to zero, due to the shielding and focusing of the lights.

Comments: (1) Light always travels in a straight line and will be seen at the closest neighborhoods. However the light intensity decreases with increasing distances. There are no quantitative data in the EIR from lighting calculations to judge the amount of light intensity seen by an observer at some distance. This is a real missing issue in the whole EIR and it needs to be remedied in the final EIR.

(2) Due to trees light from the lamps and reflected light from the field can be obscured. However it cannot be judged if this is valid for all houses at the border of the park. Nevertheless residents will see the sky glow above the sport field.

(3) This statement is very weak, no data presented; only a statement is given. Secondly there is a huge difference in how this is measured. Has the horizontal illuminance been measured (the light that falls on a horizontal surface), or has the vertical illuminance been measured (the light that falls on a vertical surface and this is what enters people's home)? Finally, it is very important to quantify "spillover". These calculations for horizontal and vertical illuminances need to be made in order to be able to make a valid judgment about the amount of light entering people's home or that is seen by an observer.

(3a) "would drop to zero". This phrase is almost always encountered in EIRs and permits and is wrongly used to show that there is no light impact. In general people use illuminance meters to measure this. It very strongly depends on the quality of light meter. The majority of the light meters used cannot measure accurately below about 0.05 fc (0.5 lux), although the resolution on the display can be 0.001 fc (0.01 lux). A value of 0.025 fc (0.25 lux) is the amount of light received under a full moon high in the sky. Stating that "it drops to zero" is technically and scientifically wrong. It should (shall) be stated that the light level is less than a certain value (e.g. < 0.05 fc).

(4) The definition of "spillover" is lacking in the EIR.
Lighting plan – Design

EIR IV.B-34: Based on the evening views comparative photographic study conducted for the proposed project, it appears that, although the project site would likely appear substantially brighter as compared with existing conditions or other illuminated areas in the vicinity, the proposed lighting is unlikely to spill over the site’s boundaries substantially enough to adversely affect the surrounding neighborhoods. Also, the spillover would not affect the amount of light of the night sky, as the sky appears similar above the athletic field lights as above other areas with no athletic field lights. While these assumptions may change during particularly foggy weather conditions, they would not be expected to change so much that lighting at the fields would substantially affect views of the project site from the surrounding public vantage points. Specifically, under foggy conditions, the lighting would be more diffused and would likely be more visible higher up in the sky and from vantage points further away. Other existing light sources, such as street lighting and residential and commercial building lighting, also result in light diffusion and this project would contribute to the existing general “glow” that can occur during foggy conditions. The proposed project would not result in direct light and glare in people’s homes and field lighting would be turned off by 10:00 p.m. Based on the discussion above, this impact would be less than significant.

Comments: As stated earlier the big omission in the EIR is a decent lighting plan calculation. Only the illuminance values for the sport fields are given and a type of luminaire in the text, without a light plan calculation with illuminances contours as a result.

The following is missing in the DEIR:
- what is the illuminance of the walkways?
- calculation of how far the light reaches to the edges of the park (e.g. fc-contours).
- calculation of the vertical illuminance at the edges of the park (important to estimate the amount of light entering people’s home.)
- calculation of the visibility/brightness of the lamps of the sport field for an observer at various distances. Although they are shielded to some extent, there is no quantitative data and they will shed light to the surroundings.
- calculation of the increased night sky brightness in the Park and the surroundings during clear nights, under cloudy conditions and during fog.

Lighting plan – Type of lamps

EIR II-15: Each light fixture, or assembly, would consist of ten 1,500-watt metal halide lamps. During regulation play and practices (the majority of the time), seven of the ten lamps would be turned on.
Comments: Spectra of metal halide lamps have a substantial blue color component. This blue light component attracts insects and disrupts also the animal and human circadian clock (it breaks down melatonin). This negative aspect is not mentioned in the DEIR.

These lamps are widely used as they have a good color rendering, but with this negative impact. The alternative is high pressure sodium lamps (which are more energy efficient as well), but give an orange-whitish light.
Professional Resume

- relevant to light pollution modeling, measurements and consultancy

Name: H. Spoelstra
Date of birth: February 7, 1953
Nationality: Dutch

Education
HAVO B (High School) with Mathematics, Physics and Chemistry
Bachelor of Science in Chemistry
Degree 1970
Degree 1974

Work history (related to light pollution modeling, measurements and consultancy)

At Lumineux Consult
2011-present Consultant for light pollution modeling, measurements and advice on light pollution issues (e.g. Environmental Impact Assessments).

At KEMA
2005-2010 Consultant and account manager for issues regarding light pollution including modeling, measurements, drafting reviews in Environmental Impact Assessments.

Please refer to the end of this Resume for the total work history.

Experience in light pollution modeling, measurements and consultancy

Year: Projects

2011-2013 Research on the impact and reach of light emitted by cities, industrial areas and highways to the surroundings using night time measurement campaigns of the night sky brightness in the Netherlands (by order of RIVM).

2011 Review of a light pollution impact report for the light emission of a Residue Derived Fuel Plant close the Waddenzeed (a protected part of the North Sea).
Development of a software screening tool for light pollution impact from cities, industrial areas and highways onto the surroundings, for the organization of the twelve Dutch provinces (IPO), in cooperation with DGMR and Sotto le Stelle.

Measurements and preparation of a light pollution map for the city of Amsterdam.

Monitoring of light pollution during a full year for the Dutch National Institute for Public Health (RIVM).

Drafting of a light pollution impact and prevention section in an EIA (Environmental Impact Assessment) for an underground storage for natural gas in the Netherlands.

Calculations of the light impact for a number of different greenhouses in the Netherlands and reviewing the light pollution impact and prevention sections in Environmental Impact Assessments of Greenhouses.

**YEAR**

**PRESENTATIONS**

2011
“The first light pollution map for the city of Amsterdam”
at the 11th Dark Sky Symposium in Osnabruck (October 6, 2011).

2011
“IPO-light calculation model for light pollution”
at the 11th Dark Sky Symposium in Osnabruck (October 7, 2011)
duo presentation with Marian van Asten from the province of Utrecht.

2011
“Developments of light pollution impact and research in the Netherlands”
Annual member meeting of the “Prevention Light Nuisance” Organization in Antwerp-Belgium (April 2, 2011).

2008
“Modeling of light pollution: understanding the light propagation in the atmosphere, the influence of the degree of urbanization and weather conditions”.

2007
“Light pollution and limit values artificial light”.

2008
“Weather and light pollution”
Meeting March, 13,-2008 of the Knowledge Network Public Lighting (GWW).
Presenting a course component "light nuisance" as part of a lighting application course.

YEAR | PUBLICATIONS
---|---
2009 | Report Darkness Quality
"Skybeamers - Visibility and ranging at the night sky" (only in Dutch). April 2009.
2009 | "Light nomogram" at the "Dark Skies Awareness" website (February 2009). http://www.darkskiesawareness.org/nomogram.php

Please refer to the website www.lumineux-consult.com and click “References” at the top of the entry page for web links to the various projects.
Work history (short total overview)

**At Lumineux Consult** ([www.lumineux-consult.com](http://www.lumineux-consult.com))

2011-present  **Consultant** for:
- Light pollution modeling, measurements and advice on light pollution issues (e.g. Environmental Impact Assessments);
- CO₂ and NO₃ monitoring and trading;
- Statistical consultancy on sampling techniques and uncertainty calculations for monitoring and data handling systems.

**Auditor** of national emission measuring teams for the Dutch Accreditation Council.

**At KEMA** ([www.kema.com](http://www.kema.com))

2005-2010  **Consultant** for:
- Issues regarding light pollution including modeling, measurements, drafting reviews and Environmental Impact Assessments;
- CO₂ and NO₃ monitoring and trading;
- Statistical consultancy on sampling techniques and uncertainty calculations for monitoring and data handling systems.

2003-2005  **Product group manager** of the emission monitoring team and calibration laboratory at KEMA.

1986-2001  **Senior specialist and consultant** in the field of emission monitoring.
**Auditor** of compliance to Environmental Guidelines of five power plants for the World Bank.

**Coordinator** for round robin tests for international emission monitoring teams.

**Trainer** in statistical courses and emission monitoring teams.

**Writer** of standards for the CEN.

**At TNO** ([www.tno.nl](http://www.tno.nl))

2001-2003  **Project leader** in the field of air quality monitoring.

**At Geosens B.V.** (non-existent anymore)

1982-1986  **Head Atmospheric Research and coordinator** of measuring flights with aircraft on air quality monitoring in the Netherlands and Germany.

**At Shell Research Laboratories Amsterdam** (Shell Global Solutions International [www.shell.com](http://www.shell.com))

1981-1982  **Researcher** on pilot scale installations on safety aspects of LPG and LNG calamities.

**At ECN (Energy Research Foundation** [www.ecn.nl](http://www.ecn.nl))

1974-1982  **Researcher** on pilot scale photochemistry for air pollution and modeling.
Planning Commission - Patrick Hannan from City Fields Foundation has been instrumental in changing how athletic fields are being build throughout the City. Though artificial turfs have been asset with regards to less immediate and short-term costs to DPR. Matter of fact, it will cost the people of SF to maintain these turf fields. For instance, the Mission Street and 16th fields are no longer safe to play on; the materials has torn beyond repair, the tires and other materials are forming dune like piles and DPR cannot pay for its maintenance. At Crocker Amazon, the fields are being used beyond their intended use. The DPR has immensely increased the fields usage starting @ 6:00 am for many sports and up to 10:00 pm. The department that issues permits does not care about keeping the environment safe and rather, are asking for high fees to play on said areas.

If the Beach Chalet fields are going to be built, then (a) have DRP and City Fields Foundation provide adequate long-term maintenance service as long as either party is in existence; (b) DPR permitting service has to eliminate unaffiliated programs or programs that can be played off of turf fields, such as frisbee or touch football (i.e. Crocker Amazon has a grass football field which is not utilized on weekends or weekdays except during pee-wee football scrimmages); (c) develop long-term planning for adequately studying the long-term effects and costs for having turf fields; and (d) have City Fields replace the 16th and other dilapidated fields.

Thank you
We are writing to urge you to expedite the renovation of the Beach Chalet playing fields for the children of San Francisco.

Kevin Starr
Sheila Starr
From: tumble weed [mailto:beachcomber18@gmail.com]
Sent: Sunday, December 11, 2011 8:51 PM
To: bill.wycko@sfgov.org; sfoceanedge@earthlink.net
Subject: Proposed changes to soccer field behind Beach Chalet

I am a frequent visitor to Ocean Beach and a human being who *knows* that nature and humans aren't two separate categories. I oppose the proposed artificial turf mega-soccer field.

I realize that the current conditions are hazardous due to gopher holes. This problem can be addressed through increased maintenance.

What can't be addressed is the disturbance to the habitat and light cycles to such wild animals as birds, bats, etc. There are so many things wrong with this, from the hazardous waste disposal problems it will create in 7 - 10 years to the prospect of children playing in ground up tires. And children being taught by example that natural fields are too dangerous to play in (!); that they need a formal regulation field in order to play childhood games.

In short, please keep the field natural. For the wildlife, for the children, for the civic, non-commercially driven future most San Franciscans want.

Thank you,
lyn stein
From: Kathleen M. Stern <kathleen.m.stern@comcast.net>
To: bill.wycko@sfgov.org

Date: Sunday, December 11, 2011 03:33PM
Subject: BEACH CHALET ATHLETIC FIELDS RENOVATION - Draft Environmental Impact Report

Re:

Public Comment on the Draft Environmental Impact Report
Beach Chalet Athletic Fields Renovation
Planning Department Case No. 2010.0016E
State Clearinghouse No. 2011044005

Dear Mr. Wycko:

The DEIR states that the proposed Beach Chalet Soccer Fields Renovation Project has a "significant and unavoidable impact on historic resources". However, the two on-site alternatives in the DEIR - Grass Turf with Reduced Lights and Synthetic Turf without Lights - do nothing to mitigate the significant and unavoidable impact. They are both in conflict with the Golden Gate Master Plan which says that the western edge of the park should remain "sylvan" and "pastoral".

The DEIR treats project adverse impacts as if they are limited to an isolated site. In doing so, it tends to ignore the damage done to one's entire experience of the western end of the park. There is a conflict between the philosophy of restoring the Murphy windmill and the philosophy of putting in a sports complex with artificial turf and stadium lights. The windmill restoration was completed in October, 2011. Please include an alternative in the DEIR that restores the Beach Chalet Soccer fields with natural grass and no lights. This alternative, combined with the off-site alternative in the DEIR, would keep the western edge of the Park "sylvan" and "pastoral" and provide more hours of play for youth soccer.

Sincerely,

Kathleen Stern
636 46th Avenue
San Francisco, CA 94121
Dear Planning Commission:

I am writing to express my support for the Beach Chalet Fields Renovation. I think it is an extremely important project for the benefit of San Francisco's kids and families. There is a lack of soccer fields, not to mention safe ones, in the city. Anyone who has visited the fields at Crocker-Amazon, or any of the other turfed fields in San Francisco, can attest to their superiority over most of the city's grass fields.

Recreation is a basic need for San Francisco children and families. The renovation of the Beach Chalet fields is a good step toward helping us provide the necessary infrastructure for fulfilling this need.

Thank you for considering my opinion.

Joel Streicker

cell: 415-627-7817
joelstreicker@gmail.com
I am writing to let you know that I am 100% in support of the Beach Chalet Athletic Fields Renovation Project. It’s imperative that this project be approved and completed as quickly as possible. One need spend only five minutes at Crocker Amazon to witness first-hand the positive impact of this type of project in a city that is woefully under-resourced with usable and safe athletic fields.

The Environmental Impact Analysis and Report has been over 1.5 years in the making. The Report makes it abundantly clear that this project should move forward and there are no environmental reasons to delay.

Please push forward quickly and make Beach Chalet Athletic Fields Renovation a reality for the people of San Francisco.

Thank you.

David Thompson
920 Diamond Street
San Francisco, CA 94114
(415) 824-8563
December 5, 2011
1556 Great Hwy, apt 101
San Francisco, CA 94122

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

Dear Mr. Wycko:

At the scoping session, and later in writing, I described a specific concern regarding crumb rubber. I do not see that concern addressed in this draft so I will repeat it:

"The EIR must document how much crumb rubber migrates to areas surrounding artificial turf fields currently in use, then estimate the amount that will migrate into areas surrounding this project. Using this figure, the EIR must calculate how much crumb rubber will accumulate in park soil over time, and how that accumulation will affect flora and fauna. Will animals directly consume the rubber? What are the potential effects as these compounds are
broken down and absorbed into the ecosystem?"
The DEIR does discuss the presence of carcinogens in crumb rubber and the problem of leachate. But that problem is different than the accumulation in the soil of solid crumbs full of toxic compounds and their long-term effects on the ecosystem.

Sincerely,
Gene Thompson
(415) 564-0706
December 8, 2011

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

Subject: BEACH CHALET ATHLETIC FIELDS RENOVATION
Draft Environmental Impact Report
Planning Department Case No. 2010.0016E
State Clearinghouse No. 2011022005

Dear Mr. Wycko:

I write today to express my deep opposition to the proposed renovation plan to the Beach Chalet Soccer Fields. I believe that this renovation project is abusive and disrespectful to the Park Master Plan and also to the legions of residents who find recreation, solace and sanctuary in the wild western end of Golden Gate Park. I for one have been enjoying the wildlife and wild spaces of that area for some thirty years.

In my opinion, this misguided plan has come as far as it has because of the influence of an organized special interest group that also enjoys an ongoing direct rapport with the Dept of Recreation and Parks. It's only natural; the two are in an existing relationship. However the Dept of Recreation and Parks is not considering the vast numbers of other recreational users of this area who are neither organized nor have an ongoing relationship with the Dept. They are the unnoticed and uncounted ones and although their numbers are great, their voice is faint.

The recreational use of the western end of the park by urban dwellers seeking an hour or two of natural scenery, a chance to watch a red shouldered hawk hunt for gophers in the fenced-in grass soccer fields, an encounter with a raven or a red fox, or just a stroll along the old railroad trail that runs along the soccer fields is in my opinion tremendous and greatly under estimated apparently by the Dept of Rec and Parks and most certainly by the Draft EIR.

The Draft EIR virtually dismisses the potential impact on the wild and natural ambiance of the area. I would like to ask that a more impartial study be done to address the impact on the aesthetics of this area, a study that would evaluate the recreational value of all of the uncounted individuals who enjoy the area; children who do not play on athletic teams, seniors, bird watchers, amateur photographers, just about anyone seeking a few moments of calm and respite. Considering the real impact of these drastic renovations on the park's wildlife should be a key concern of the study.

In reviewing the Draft EIR, I feel compelled to state that it does not appear be an objective evaluation. In my opinion it appears to be an attempt to go through the motions of an EIR without doing the subject justice. For instance, they state that the impact on the old railway trail will be minimal because one cannot see the soccer fields from most of the trail when in fact anyone who walks that trail knows that the fields are visible for virtually the entire length of the trail.
There are many other glaring problems with the DEIR that you are no doubt hearing about. Why are 30-foot *Myoporum* trees dismissed as only shrubs? Why is the dual impact of the soccer field renovation and the water treatment plant not being addressed in the DEIR? What will the cumulative effect be on the wildlife? I find it heartbreaking that our city and our appointed commissioners of the Dept of Recreation and Parks are not taking into consideration, the wildlife that lives in the park and their value to the citizens of San Francisco.

As I mentioned, I have been finding joy and recreation in the park, especially the west end area for thirty years. I have spent countless hours there bicycling along the old railroad trail, stopping to watch the hawks and the ravens, enjoying the various species of birds that migrate through or winter in the park like the Allen’s hummingbirds. I often go there in the late afternoon just to catch a glimpse of a red fox, the introduced species that has taken up residence in the park and now apparently only survives there on the western edge of it. This year I frequented the park even more than I normally might as I got caught up in watching a pair of Great Horned Owls that produced a small crop of owlets this spring. Watching them grow, thrive, learning to fly and hunt was enchanting and became as addictive as a daytime soap opera might be. I shudder to think how 60-foot banks of high-wattage lighting would have impacted their evening hunting forays.

I fear that all of these animals will be adversely affected by the planned soccer field renovations. There is little doubt that night lights, plastic turf and elimination of habitat will at the very least, not be good for them. And it is not just the creatures that live there now, it is the loss of future wildlife there as well. Habitat destruction has a long term impact. When it’s gone, it’s gone.

Soccer recreation is a wonderful asset to offer our children, there is no argument with that. But let’s do it in a way that is sustainable for the park’s wildlife and other recreational users.

I would like to strongly suggest that the city and the Dept of Recreation and Parks look seriously at the **Compromise Alternative** put forth by the public during the Planning Commission hearing of December 1st, 2011. The Compromise Alternative is to renovate the Beach Chalet fields with natural grass and no lighting and to renovate the West Sunset Playground to provide more hours of play for youth soccer. I request that the Planning Department focus on this alternative and work to find a solution that protects Golden Gate Park’s parkland.

I thank you for your ear and I do sincerely appreciate the opportunity to voice my opinion. It breaks my heart to think of the irreversible impact that the Soccer Field Renovation project will have on such a sacred and unique part of San Francisco. Please, let’s not let this happen on our watch.

Respectfully,

Joyce Warriner
32 Dorland St.
San Francisco, CA 94110
Bill Wycko  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103  

December 7, 2011  

Dear Mr. Wycko,  

I couldn’t think of a better day than my birthday to express how much the City Fields program to improve our City’s recreational fields and playgrounds mean to me and how important they are to the vitality of the City. I have raised three children in San Francisco - playing on JCC Rec and competitive select soccer teams, attending high school and playing on various fields around the City, and attending many tournaments. The Beach Chalet was always one of our favorite locations to play, except it was horrible having to watch your children through a cyclone fence because the field conditions wouldn’t support people parents watching their kids play, or even worse, arriving and finding out that games were cancelled because rain had fallen the day before. Improving the Beach Chalet Fields is EXTREMELY important for the City, its families, its young people, and its citizens. Please do not delay in passing this.  

I believe that all San Francisco kids deserve safe, accessible and world-class parks and athletic fields. I wholeheartedly support the proposed renovation at Beach Chalet soccer fields and encourage you to continue supporting the Playfields Initiative partnership between the City Fields Foundation and San Francisco Recreation and Parks Department. The DEIR is a well-researched document and this project has been thoroughly analyzed.  

The DEIR shows that installing synthetic turf and lights is the only option that can provide more than 9,500 hours of new play time to the Beach Chalet soccer fields, essentially resolving San Francisco’s deficit of athletic fields for youth during the busy after-school hours.  

I urge the Planning Commission, the Mayor, the Board of Supervisors, and the entire City family to support this partnership so that every child in our city has a place to play and enjoy the wonder of sport.  

Sincerely,  

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

Dear Mr. Wycko:

The SF Recreation and Parks Dept. is proposing to replace 9 acres of open, naturally growing grass in Golden Gate Park with synthetic turf and to install ten 60 foot tall stadium lights that will illuminate the western end of Golden Gate Park for the first time. This project will remove important wildlife habitat, increase disturbances to neighbors and wildlife, and violate the Golden Gate Park Master Plan.

The project calls for removal of 9 acres of natural grass which provides habitat to birds, butterflies and other wildlife and there is no mitigation proposed. The report states that birds and other wildlife can go to other places. There are no other places in San Francisco. The few grassy fields in San Francisco are already established territories for hawks and other wildlife.

The project calls for the installation of 10-60' towers with stadium lighting that will remain on until 10:00pm every night. Artificial lighting has been shown to draw birds off course during migration and disturbs birds from feeding and resting. This site is within the Pacific Flyway, in Golden Gate Park and 1000 feet from Ocean Beach. See the studies conducted by Rich and Longcore and others at http://www.urbanwildlands.org/ and http://www.prbo.org/cms/index.php?mid=276#lights
The Golden Gate National Recreation Area (GGNRA) is calling for the protection of nearby Lands End as a dark skies site where visitors can enjoy observing the constellations. The GGNRA has a planned event called Explore the Night Sky on December 3 at 6:00pm. The GGNRA’s website and their 20 year Master Plan calls for keeping Lands End as one of the places where visitors can enjoy the night skies. Their website states that “the National Park Service is dedicated to protecting natural lightscapes where it can and the construction of the new visitor facility at the site reflects that awareness.” See http://www.parksconservancy.org/calendar/lands-end-explore-the-night.html  Stadium lighting that will be on until 10:00pm will put an end to these activities.

The lighting will negatively impact nesting birds and other species that depend on the area surrounding the current natural grass soccer fields as habitat. See http://www.cell.com/current-biology/retrieve/pii/S0960982210010183  Brightly lit plastic grass covered with crumbled tires does not provide habitat for anything. Why is there no mitigation for the people and wildlife that are negatively impacted by this proposed project?

There is no recycling of the artificial turf plastic and tire crumb rubber, in 8-10 years 400 tons of debris will go to the landfill.  Since 2008 the San Francisco Department of the Environment has called for reducing waste that is sent to landfill.  See the link to Stop Trashing the Climate on the Department of the Environment’s website at http://www.stoptrashingtheclimate.org/  Why does the project not include recycling?

It is much less expensive and more environmentally sustainable for the City to restore the natural grass fields. Sustainability is a commitment to social, economic and environmental factors that promote long-term survival, a capacity to endure and a sustained quality of life. Most important, it means to think about the impact our actions have on the environment, on the economy and on future generations. Why is natural grass which sequesters carbon dioxide not recommended when the installation of the artificial turf is the equivalent of putting asphalt in 9 acres of Golden Gate Park?

There are ways to manage the gophers on natural grass fields as indicated in this recent article about golf courses in San Francisco. The golf courses are also managed by San Francisco Recreation and Parks Department staff. See http://www.sfgate.com/cgi-bin/article.cgi?f=/c/a/2011/11/29/DDDK1M3JCA.DTL.  Why isn’t this successful program of gopher management recommended?

This is a onetime gift to the City.  When the artificial turf fields need to be replaced in 8-10 years where will the millions of dollars come from?

Thank you,

Noreen Weeden
493 Vermont Street
San Francisco, CA 94107
Noreen@naturetrip.com
Linda D. Avery-Herbert
Director of Commission Affairs
SAN FRANCISCO PLANNING COMMISSION &
SAN FRANCISCO HISTORIC PRESERVATION COMMISSION
1650 MISSION STREET – SUITE 400
SAN FRANCISCO, CA 94103-2414
TEL: 415.558.6407 – FAX: 415.558.6409
WEBSITE: www.sfgov.org/planning

----- Forwarded by Linda Avery/CTYPLN/SFGOV on 11/16/2011 06:32 PM -----

Lorraine Woodruff -Long
<lorraine@sfpal.org>
11/16/2011 11:50 AM

To awmartinez@earthlink.net,
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marlena byrne@sfgov.org

Subject Support for Beach Chalet Field Renovation

Dear Commissioners,

As a seventh generation San Franciscan, a mom of two San Francisco kids, and the Executive Director of San Francisco Police Activities League (PAL), I am writing to urge your support of the Beach Chalet Athletic field rehabilitation project in Golden Gate park. Please approve this project to ensure that Golden Gate Park continue to evolve as a place that provides healthy activity for children and families.

The photograph above is of my Great-Grandmother and Grandfather and their baby daughter in Golden Gate Park in 1913. Fortunately, in 1913, our city leaders already dedicated the Children's Playground as an innovative space to play for our city's children and families. Since this photograph was taken, a multitude of projects have moved forward to similarly benefit families and children. These include, but are certainly not limited to, the California Academy of Science (1916), Steinhart Aquarium (1916) Kezar Stadium (1924), the Beach Chalet (1925) and Stowe Boat House (1946). Had Golden Gate Park been frozen at any point in time, our park would not be as rich or as used as it is today. My own kids, now eight
generation San Franciscans, benefit because the City has been dynamic in addressing evolving and changing needs.

Each spring, PAL provides soccer to more than 2300 San Francisco youth through the dedication of hundreds of adult volunteers. Because of limited amount of recreational fields in our urban area, we turn away hundreds of kids from all over the city every single year. This project will help us serve more kids in San Francisco. With childhood obesity at crisis levels and funding for P.E. slashed in our schools, expanding field access by 300-400% through this renovation, will help thousands of San Francisco kids. Golden Gate Park has been, and must continue to be, a place that both preserves the best and evolves for future generations. Please approve the renovation of the Beach Chalet fields as proposed by the San Francisco Recreation and Park Department through the City Fields Foundation.

Sincerely,

Lorraine Woodruff-Long
Executive Director, SF PAL
(& San Francisco parent of two)

San Francisco Police Activities League
350 Amber Drive, San Francisco, CA 94131
Direct: 415-401-4669 * Main: 415.401.4668* Fax: 415-401-4670
www.sfpal.org
I have reviewed the DEIR for the Beach Chalet Athletic Fields project and believe that the document does not adequately address the environmental impacts of the proposed project on the Golden Gate Park. CEQA Article 20 - Definitions, Section 15360. Environment states:

"'Environment' means the physical conditions which exist within the area which will be affected by a proposed project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historical or aesthetic significance. The area involved shall be the area in which significant effects would occur either directly or indirectly as a result of the project. The 'environment' includes both natural and man-made conditions. Note: Authority cited: Section 21083, Public Resources Code; Reference: Section 21060.5, Public Resources Code."

The DEIR has failed to provide a complete analysis of the project's impacts on the environment as defined by Section 15360, and therefore, the DEIR has failed to propose appropriate mitigations to the project's effects. The following impacts on the physical conditions were not adequately addressed:

1) The DEIR did not study the project effects of wind and shadow on the existing soccer area. This means that the loss of the existing windbreak provided by healthy, mature trees and shrubs that will be removed was not evaluated. The windbreak provides protection from gusts directly off the ocean that negatively affect recreational play, the integrity of the forest, and wildlife habitat. Also, the presence of shadow in the area is a requirement for some wildlife. Loss of shadow was not evaluated. Mitigation measures that could have been considered include retaining the maximum number of trees and shrubs by reducing the number of the optional amenities that require the removal of trees and shrubs.

2) The DEIR did not do long term modeling of the project effects on flora and fauna in the soccer area. The comments only included "construction related impacts" of the project, not the environmental consequences over time of the existence of the proposed project or any of the alternatives. What happens to the environment if the raptors leave? What happens to all of the wildlife in the western end of the park if lights are installed? What happens if lots of little trees are used to replace tall established trees and shrubs - will they even survive in the area with the extensive tree removal proposed for both the soccer project and the water treatment plant? Before an irreversible act of removing healthy trees is considered, the full consequences must be known and appropriate project modifications proposed as mitigation.

3) The cumulative environmental impacts of both the soccer and the water treatment projects together on the western end of the park were inadequately studied with comments about the
potential for harm noted only during construction. Long-term impacts are noted for hydrology and water quality, without any mention of the long-term biological effects. These two projects together create a potential devastation of this wild area, both occurring in the same geographic area and possibly at around the same time. The aggregate physical impacts are not described and therefore cannot be mitigated.

4) The mitigations for tree removal are simplistic and unrealistic, and not likely to ensure any mitigation to the potential harm of the loss of healthy mature trees. What is meant by “removed trees shall be replaced at a ratio of 1 inch for 1 inch of the diameter at breast height of the removed tree?” Does this mean one 20 inch diameter tree can be replaced by 20 each 1 inch diameter trees? The requirements for tree replacement must be specific and realistic to accomplish the functional tasks of the removed trees.

5) The definition of “trees” and “shrubs” is not in the glossary. This is critical, since only trees will be replaced 1:1 not the shrubs, which can be as tall and as important to the environment as any tree. Both are habitat for wildlife and support the livability of the west end of the park for all flora and fauna. The DEIR is inconsistent in its references to “trees and shrubs”. On page IV.C-22, the report states that “replacement of significant trees and shrubs in kind and at a 1:1 ratio would be consistent with the guidance provided in the Standards.” Yet page IV.F-33 only references trees for replacement. Which is correct?

A NEW ALTERNATIVE FOR EIR EVALUATION

The faulty DEIR analysis did not produce alternatives that would better protect GGP while meeting the project goals. The DEIR did not reference the fact that the proposed water treatment plant is being located on the site where the fifth soccer field was proposed in the GGP master plan. A soccer field is much more consistent with the purpose of GGP, than is a water treatment plant that can be located elsewhere and is specifically mentioned in the master plan as something to be removed. The DEIR should consider this site as part of a new alternative that has all Beach Chalet soccer fields as natural grass, and incorporates a fifth field of natural grass to facilitate more play time while other fields rest. This new alternative should have no lights on any of the five soccer fields. If night soccer play with lights and/or use of synthetic turf is needed. a second site should be developed at West Sunset Playground as an adjunct to the five Beach Chalet fields. This combination of alternatives will meet the stated goals.

The DEIR states that the Off-Site Alternative “would have construction-related impacts similar to or greater than the proposed project because the fields are more proximate to sensitive receptors such as schools and residences...”. This implies that a project’s impact on people (the sensitive receptors) has greater importance in the DEIR consideration of the alternative than the project’s impact on the non-human environment. Is there a hierarchy of impact significance between all the elements reviewed in the DEIR, with some elements more worthy than others? If so, I am unaware of this grading system. If not, remove the reference to “sensitive receptors” causing “greater” impacts, because this statement will unfairly mislead the decision makers as to what the DEIR is saying.

I hope you will revise the DEIR to incorporate additional studies, definition of terms, and a new alternative that will both preserve the integrity and wilderness of the Beach Chalet area while fostering soccer play with high quality natural grass fields and West Sunset field enhancements.
December 12, 2011

TO: Mr. Bill Wycko, Environmental Review Officer

FROM: Nancy Wuerfel

RE: Comments on DEIR for Beach Chalet Athletic Fields Renovation Project 2010.0016E

Attached is an article in the December edition of the Sunset Beacon. Please include this in the comments for the DEIR for the Beach Chalet Athletic Fields. The article is written about the Planning Commission's hearing for the DEIR held on 12/1/11 at City Hall.

You will see that proponents of the proposed soccer complex do not care about protecting the environment in Golden Gate Park. It is just vacant land available for development.

Ms. Hirsch from the sponsor City Fields Foundation is quoted as saying there is "practically no impact" to the environment, though clearly the DEIR shows there are many impacts on the park. One soccer coach is quoted as saying "there's been enough EIRs for all the schools in the area (with artificial turf)" - as if the environmental issues are all the same for every site.

These sentiments demonstrate their passion for more soccer fields, but without respect for the location of this project inside of our nationally registered historic place. Like any beneficiary of a proposed project, they want to see it built as they desire. It is up to you in the Planning Department to uphold the CEQA law that protects the environment, and to require a thorough analysis of all the project impacts on it, so that alternatives or mitigations can be properly considered. The comments sent to you asking for more review must be enacted.

The current DEIR has not adequately evaluated all the impacts to the Golden Gate Park or the surrounding neighborhoods. Please provide the additional analysis requested of the EIR by those who have taken the time to read the DEIR and find it incomplete.

Enc.
Battle Over Turf, Lights at Park Athletic Fields

By Ed Moy

The proposed Beach Chalet Athletic Field Renovation Project in Golden Gate Park sparked some heated debate during a SF Planning Commission meeting on Dec. 1.

More than 100 people turned out for a public hearing on the Beach Chalet Athletic Fields’ Draft Environmental Impact Report (DEIR), forcing the overflowing crowd into a separate room to watch the event on closed-circuit television.

Included among the crowd were representatives from SF Ocean Edge and the Golden Gate Park Preservation Alliance, whose members were wearing “Save Golden Gate Park” buttons. The groups are opposed to the plan.

Also addressing the task force were speakers from the City Fields Foundation, Audubon Society, Sierra Club, SF Beautiful and other local organizations.

Susan Hirsch, the director of the non-profit City Fields Foundation (CFF), which is overseeing the project and others in the City where natural grass is being replaced with synthetic turf, said there is “practically no impact” to the environment.

But Hirsch’s opinion did not deter local residents and “Save Golden Gate Park” supporters from speaking out against the project during the public comment period.

Opponents to the project questioned its environmental impact on the Park due to the proposed installation of synthetic turf and field lights, which they felt would adversely affect plant and animal life in the Park and the surrounding neighborhoods.

According to Patrick Hanan, director of communications, planning and programs for CFF, the proposed athletic fields renovation will cost upwards of $12-$13 million, with construction being completed in early 2014, pending approval of the final design by the SF Recreation and Park Department (RDP) and the Planning Commission.

Hanan said the project’s EIR

Continued on page 2

Golden Gate Park Athletic Fields

Continued from page 1

will go to RPD for consideration of approval in the summer of 2012, followed by further redesigns, contract bids and final approval from the Planning Commission before any construction could begin.

Katherine Howard, a member of the steering committee for SF Ocean Edge, a group that has been actively raising awareness about the project, said the DEIR had several flaws and that the City has not done enough outreach in the neighborhood to inform residents.

“Our goal is to have the Planning Department seriously consider what we call a compromise alternative,” Howard said. “These are alternatives that are in the report, but they’re divided up into different sections. They (include) renovating the West Sunset Field with a better playing surface, possibly with stadium lighting, and renovating the Beach Chalet fields with real grass, good drainage and a state-of-the-art irrigation system, but without the stadium lighting.”

Soccer coach Richard Cross, who has coached at the Golden Gate Park athletic fields for more than 20 years, said he supports the renovation project because there is no possibility that a grass surface can be adequately maintained for the number of players who want to use it. Rain often keeps grass fields closed for extended periods of time.

Cross added that putting in artificial turf will allow for more than 9,500 hours of playing time on the field per year, which would result in nearly $350,000 in usage fees collected by RPD, money that could be spent on hiring more personnel to maintain park facilities.

“ monetary isn’t the EIR. There’s been enough EIRs for all the various schools in the area,” said Cross, who pointed out that many of the high schools and colleges have already installed artificial turf fields. “The EIR issue is not something that I feel is valid and I think that the report is adequate to be processed.

During public comment, neighborhood resident Gene Thompson also raised the topic of “crumb rubber” from car tires, which is used in the manufacturing of synthetic turf, and its potential impact on the environment.

Thompson recalled having spoken with a parent who described to him how their children often tracked the crumb rubber bits in their cleats all the way to the floor of their home after playing on synthetic turf.

After doing some research, Thompson found an EPA list of compounds contained in car tires. The list included potentially toxic chemicals such as acetone, arsenic, lead, mercury and benzene.

“The EIR must calculate how much crumb rubber will accumulate in park soil over time, and how much that accumulation will affect flora and fauna,” Thompson said. “Will animals directly consume the rubber? What are the effects as these compounds are broken down and absorbed into the ecosystem?”

However, studies by the California Environmental Protection Agency to assess the potential for ingestion exposure to the chemicals in crumb rubber by children playing on synthetic turf have concluded “health risks to children from the ingestion of crumb rubber are low.”

To view a copy of the DEIR, go to the website at www.sfplanning.org. Written comments can be sent to: Environmental Review Officer, SF Planning Department, 1650 Mission St., Ste. 400, S.F., CA 94103.
Dear Mr. Wycko,

My name is John Zwolinski. I live with my wife and two young sons in our home a block from the Murphy Windmill.

I'm bemused that some people are able to look at the Beach Chalet Soccer Fields in their current state and discern "sylvan meadows" or a "wildlife sanctuary," while all I am able to make out are dilapidated, dirty, and dangerous playing fields. After more than two years going 'round and 'round with opponents of the project, I strongly suspect we'll never get all concerned on the same page as to what Beach Chalet Soccer fields are at the moment, never mind what they could be or should be in the future.

However, I do know this: The very vocal, very well-organized minority who oppose the proposed Cityfields renovation, no doubt confident that it would kill the project, demanded an exhaustive, comprehensive, time-consuming and expensive EIR. And, they got it. Yet now that the report has ended up green-lighting the project, they are clamoring that it wasn’t exhaustive enough, wasn’t comprehensive enough, and wasn’t time-consuming enough. They probably feel it wasn’t expensive enough, either. They insist that we all take a deep breath and go back to their drawing board.

Enough is enough. When we began this conversation a couple of years ago, my sons were four and six, and just beginning to play soccer. They are now six and eight, and during soccer season, we drive all over the City to play on whatever fields are available. Sometimes, no fields are, and the kids don’t play, while fields right here in our neighborhood are fenced off and paddle-locked shut. Opponents of the renovation seem to have all the time in the world to block, stall and hinder the gift of a much needed renovation, while savoring their perception that an area of GGP that has been playing fields for nearly a century is somehow actually a nature preserve, and not a
neglected corner of an urban park currently more utilized by cruisers and criminals than wildlife or families. We supporters of the proposed renovation, we soccer moms and dads, we immediate neighbors of that sketchy corner of the Park, cannot be so patient or sanguine: Will my boys be eight and ten before the fields are fit to play on and the surrounding woods safe to walk in? Ten and twelve? Eighteen and twenty?

I therefore very enthusiastically urge you to expedite the Beach Chalet Renovation Project. We have the demanded EIR, and the results assure us that we may now proceed with improvements that will be positive for the Park, positive for the neighboring community, and positive for San Francisco.

Most Sincerely,

John Zwolinski
1296 La Playa
APPENDIX PH
Public Hearing Transcripts

This appendix contains the complete transcripts of the public hearing on the Draft EIR held before the San Francisco Planning Commission on December 1, 2011. Copies of all written comments received on the Draft EIR, including comments submitted either by letter, fax, or email, are included in a separate appendix, Appendix COM.

The public hearing transcripts are coded the same way as the written comments. Comments are grouped under one of three categories: public agencies, non-governmental organization, or individuals. However, the public transcript presents all oral comments chronologically, in the order in which they were presented at the public hearing. Table COM-1 lists all of the commenters who presented oral comments at the public hearing alphabetically by commenter, and indicates the corresponding comment code prefix for each commenter.
BEFORE THE SAN FRANCISCO PLANNING COMMISSION

REGULAR MEETING

ITEM NO. 15 - 2010.0016E

BEACH CHALET ATHLETIC FIELDS RENOVATION

PUBLIC HEARING ON THE

DRAFT ENVIRONMENTAL IMPACT REPORT

5:00 P.M.

December 1, 2011

Commission Chambers - Room 400
City Hall, 1 Dr. Carlton B. Goodlett Place
San Francisco, California

REPORTED BY:  DEBORAH FUQUA, CSR #12948
APPEARANCES

SAN FRANCISCO PLANNING COMMISSION:

CHRISTINA OLAGUE, President
RON MIGUEL, Vice President
LINDA AVERY, Commission Secretary

COMMISSIONERS:

KATHERIN MOORE
HISASHI SUGAYA
RODNEY FONG
GWYNETH BORDEN

STAFF:

DON LEWIS, EIR Coordinator
SARAH JONES, Planning Department

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SECRETARY AVERY: Good afternoon. The Planning Commission is back in session. Before we get started, if I could just make a couple of announcements.

First, turn off your cell phones or any electronic devices that may sound off during these proceedings -- your Kindle, your iPad, your Nook whatever.

Second, because the room is crowded, we do have overflow in Room 416. If you have a friend over there, whatever, they will be allowed to come in and speak.

And because it's crowded, it's very difficult if a secondary discussion goes on while we're in session. So if you feel the need to engage in conversation with your neighbor or someone across the room, please go outside and do that as it is extremely disruptive to the process.

And with that, I'm just going to call roll again, since we've had a long recess, so everyone will know that we have a full Commission today.

Commissioner Moore?

COMMISSIONER MOORE: Here.
SECRETARY AVERY: Commissioner Sugaya?
COMMISSIONER SUGAYA: Here.
SECRETARY AVERY: Commissioner Fong?
COMMISSIONER FONG: Here.
SECRETARY AVERY: Commissioner Antonini?
COMMISSIONER ANTONINI: Present.
SECRETARY AVERY: Commissioner Olague?
PRESIDENT OLAGUE: Here.
SECRETARY AVERY: Commissioner Miguel?
COMMISSIONER MIGUEL: Here.
SECRETARY AVERY: Commissioner Borden?
COMMISSIONER BORDEN: Here.
SECRETARY AVERY: Thank you, Commissioners.

The item before you at this time is Item No. 15, Case No. 2010.0016E, the Beach Chalet Athletic Fields Renovation.

This is a public hearing on the Draft Environmental Impact Report. It is not a public hearing on the project itself.

PRESIDENT OLAGUE: Okay. We'll hear from staff briefly, and then we did -- I did commit publicly last time the subject came up to allow everyone at least three minutes. So there are so many people here, so I just wanted to ask, of course, to please limit your comments to the environmental impact report.
And, also, if you feel like you can say what you need to say in less than three minutes, then, of course, that's always appreciated. And always know that you do have the ability to hand in your written comments.

Another thing is we are going to have reasonable accommodations. So I think somehow the cards might have gotten a little bit confused up here. So all elderly and people with other types of disabilities would be allowed to go first; then we'll hear from people with children so they can get home because we might be here kind of late and then everyone else after that.

So I just wanted to make -- we received those requests, and I think it's reasonable to accommodate folks in that way.

So that being said, we'll hear briefly from our department, and then we'll open up for public comment.

SECRETARY AVERY: Before our department starts, let me just make -- there was a request from a gentleman who stated he had a balance problem. I have put a chair at the front, at the lower microphone for that use and for anyone else who might have a balance problem and would need to to use a lower microphone.
Thank you.

DON LEWIS: Good evening, President Olague and Commissioners. I'm Don Lewis, Planning Department Staff and the EIR coordinator for the Beach Chalet Athletic Fields project.

Joining me tonight is Sarah Jones, Senior Environmental Planner, Alisa Moore from ESA, environmental consultant, and Rec Park park staff is also here.

The item before you is a review and comment on the Draft EIR for the Beach Chalet Athletic Fields renovation. I'd like to summarize for you the Draft EIR findings.

The Draft EIR found that the proposed project will result in significant and unavoidable impact on historic resources. The Draft EIR found that the impacts to biological resources and hazardous building materials could be mitigated to a less than significant level.

The Draft EIR found that impacts to land use, aesthetics, transportation, recreation, hydrology and water quality, hazards, and air quality effects would result in less than significant levels.

The Draft EIR provided alternatives that would reduce the project's significant and unavoidable impact.
on historic resources to less than significant levels.

The Historic Preservation Commission held a public hearing on November 16th to prepare comments on the Draft EIR. On the whole they agreed that the impact would be significant and favored alternatives. A letter summarizing the Commission's comments will be submitted on the Draft EIR.

The Draft EIR was published on November 26th, and the public review period closes on December 12th. For those of you who are interested in commenting on the Draft EIR in writing, they may submit their comments to the environmental review officer at 1650 Mission Street, Suite 400, San Francisco by 5:00 p.m. on December 12th.

For members of the public who are at this hearing tonight, please state your name for the record and address comments to the adequacy and completeness of the EIR. Comments will be transcribed and responded to in writing in the comments and responses document which will respond to all verbal and written comments received and make revisions to the Draft EIR as appropriate.

When the C and R document is complete, the Planning Department will provide copies to those who have made comments on the Draft EIR. We will then
return the Commission, likely in the summer of 2012, to request that this Commission certify the EIR. If the EIR is certified, the Recreation and Park Commission may consider approval of this project.

This concludes my presentation. I'd like to turn this over to Sarah Jones.

SARAH JONES: Good afternoon, Commissioners, Sarah Jones from the Planning Department. I just wanted to state briefly that I believe you've seen requests for an extension of the comment period. Bill Wycko, the ERO has considered these requests. He doesn't feel that this EIR is particularly unusually complicated or that there are other unusual circumstances surrounding this project.

The CEQA guidelines spell out the comment periods. A 45-day comment period is considered an adequate comment period for projects that are circulated to State agencies. And it says that under no circumstances should a comment period exceed 60 days unless there are really unusual issues at stake. So I wanted to convey that information.

Thank you.

PRESIDENT OLAGUE: At this time, I'd like to open it up for public comment. And again, I was handed a special file, so I'm going to read through this.